West Dunbartonshire Council EU- Exit Assurance Action Plan – January 2021

<u>Background:</u> The themes of Issues/Risks identified below are based on the updated UK and Scottish Planning assumptions (September 2020). On the 31st December, the Transition Period concluding EU Law jurisdiction in the UK and access to the EU Single Market ended. The new relationship is now will be defined by the EU-UK Trade and Cooperation Agreement (TCA).

The undernoted risks were identified and mitigating action was put in place to minimise any disruption. The Civil Contingencies Officer reached out to the contributing officers at the beginning of January (2021) to determine if there were any initial or future concerns as a result of the UKs departure from the EU. At this time, the risks and mitigating actions remain unchanged. The document will remain live and will be regularly reviewed and updated, if required.

<u>Contributing Officers</u> – Jen Watt, Civil Contingencies Officer; Martin Keeley, Environmental Health Manager; Stella Kinloch, Section Head Transactional Services; Derek McLean, Procurement Business Partner; Cameron Taylor, WDLT Health and Safety Co-ordinator; Stephen Brooks, Working4U Manager; Kenny Lang, Joint Services Fleet and Waste Manager; Lynda Dinnie, Facilities Manager; Alison McBride, Strategic People and Change Manager, Patricia Kerr ICT Manager and Michael McGuinness, Economic Development Manager.

	Border Disruption	– Martin Keeley and Stella Kinloch – January 2021
Broad Risk	Action	Comments
Congestion at sea	 Funding case to 	WDC EH Manager is linked in through the Scottish Food Enforcement Liaison Committee to
ports & airports	Scottish Government	work with groups looking at EU Exit implications. While the position is being led nationally, by
through delayed	has been submitted	DEFRA. The risk-based system developed by the Scottish Food Enforcement Liaison
processes with	through COSLA for LA	Committee has been accepted for use on a UK basis. WDC EH Manager is linked to the
potential impacts to:	Environmental Health	various groups involved (including APHA, Scottish Government, Food Standards Scotland
- Ports / Airports	resources nationally to	and Food Authorities (Local Authorities) and Port Health Working Groups (Imports and
- Warehouse	support the delivery of	Exports).
distribution	services related to hub	
centres	export sites and imports	Scottish Government is aware of potential bottlenecks in the delivery of the system, with Local
- Motorway / Trunk	through Border Control	Authorities potentially having to resource hubs for delivery of the system. Food Standards
Road network	Posts and in-land check	Scotland has recruited temporary staff to assist with delivery at hubs. This is being monitored.
- Rail Network	points. Resource	
	allocation will depend	Through a change in the EH undergraduate education system, funded training (placement) for
	on the need to engage	trainee Environmental Health Officers is now available to LAs.

	Border Disruption	n – Martin Keeley and Stella Kinloch – January 2021
Broad Risk	Action	Comments
	in food import controls and / or enhanced	
	export certification work to support the Scottish	The likelihood of WDC becoming a port authority for food is unknown . The demand for an establishment of an export hub(s) in WDC also unknown . This is still the case.
	food sector. Food	establishment of an export hub(s) in WDC also unknown . This is still the case.
	Standards Scotland are assisting with resource	Information on DPEs and BIPs related to the EU are given here along with a Brexit reference. https://ec.europa.eu/food/safety/official_controls/legislation/imports/animal_en
	for export hub delivery and LA mutual aid	https://ec.europa.eu/food/safety/official_controls/legislation/imports/non-animal_en https://ec.europa.eu/food/animals/vet-border-control/bip_en
	provision is a	
	consideration	Network Rail have produced a Risk Management Document, saved along with other EU Exit materials; providing reassurance that measures will be taken to ensure network operation.
	- Requirement to directly deliver controls or the	
	requirement to assist other food authorities in	
	these matters	
	(Regional / National Hubs for food export	
	certification or port	
	health controls for food import)	
	- Signposting of Scottish Government EU Exit	
	website providing	
	information on passports / personal	
	travel	
	https://www.gov.scot/br	

	Border Disruption – Martin Keeley and Stella Kinloch – January 2021			
Broad Risk	Action	Comments		
	exit/			
Return of UK	 Consider remit and 	Existing arrangements for the impact areas are in place and could cope with the numbers		
Nationals, currently in	membership of	returning to local area.		
residence within other	previous multi-			
EU countries.	disciplinary Syrian	At this time, there is no indication that this poses a risk to WDC.		
	Refugee working group			
	 as risks are similar. 			

Disruption to Se	Disruption to Service – Martin Keeley, Derek McLean, Cameron Taylor, Stephen Brooks, Kenny Lang and Lynda Dinnie – January 2021			
Broad Risk	WD Impact	Action	Comments	
Reduction, delay or stoppage in supply of medicines and medical supplies.			Please see bespoke HSCP Action Plan.	
Reduction, delay or stoppage in movement, holding of animals and supply of veterinary medicines / supplies	-Concerns with regards to livestock welfare and disposal	Continued engagement with APHA and DEFRA	APHA and DEFRA look after the animal movements and it is under vet control for medicines etc. for farm animals. This continues to be monitored.	
Reduction, delay or stoppage in supplies of other consumables	 Impacts on capital or infrastructure projects, e.g. new school at Renton Impacts on other services provided 	Services to consider supply and projects in line with significant assurance work carried out by Procurement. Supply, etc, which is continually monitored.	Considerable work carried out by Scotland Excel to provide assurances. The Corporate Procurement Unit (CPU) sent out a supplier / provider questionnaire however, of the suppliers / providers that did respond, those responses were generic. The CPU also sent out questionnaires to the Council's service areas to ascertain contingency plans should a supplier / provider not meet the specification / delivery due to Brexit.	
	through other	Continued engagement with	REG and Legal to check on existing and future contracts in terms of where	

Disruption to S	Disruption to Service – Martin Keeley, Derek McLean, Cameron Taylor, Stephen Brooks, Kenny Lang and Lynda Dinnie – January 2021			
Broad Risk	WD Impact	Action	Comments	
	nations, e.g. software	Facilities Manager re school and care home provisions.	the risk lies.	
	 Impact to Chemicals (Leisure Trust) Impact to construction industry due to import of raw material and construction products 	Refer to Broad Risk: Certain types of fresh food may decrease /prices of certain foods many increase Check on existing and future contracts in terms of where the risk lies. (service led) Continued engagement with supply chain for critical contracts to ensure early visibility of import issues	THE CPU will continue to monitor the supply chain and liaise with suppliers to ensure minimal disruption. Scottish Water / UK Water Suppliers have provided written assurance that their supply will be maintained. Hydrochloric acid is one of the main components of PAC. It has been advised that Scottish Water will be prioritised if shortages become critical. WD Leisure has now discontinued its CO2 contract and solely uses sodium	
	- Polyaluminium Chloride (PAC) – supplier: Brenntag UK	WD Leisure continuing to monitor	bisulphate for pH control. No disruption to supply is anticipated.	
	-Calcium Hypochlorite (HTH) – supplier: Brenntag UK	WD Leisure continuing to monitor		
	-Carbon Dioxide – supplier: Air Products UK	WD Leisure continuing to monitor		
Impact upon low income groups as a	- Potential welfare requirements	Engagement with Working 4U/Communities Teams to	Risk of additional costs due to welfare needs of the public. This continues to be a risk. Due to the current restrictions and lockdowns, we have not yet seen	

Disruption to Se	ervice – Martin Keeley, D	erek McLean, Cameron Taylor,	Stephen Brooks, Kenny Lang and Lynda Dinnie – January 2021
Broad Risk	WD Impact	Action	Comments
result of lack of supply of foods or price	(including Welfare Fund) enhanced	gauge how foodbanks may be affected / can be linked in with	the true impact of EU Exit. Once businesses reopen then we will begin to see what sectors have been adversely affected. This may result in business
increase of fuel, food,	- Potential impacts		closing down, resulting in job loses which in turn puts pressure on WDC to
etc	upon foodbank/food	Consideration on messaging	respond and provide welfare.
	provision capacity	with regards to the type of	
		supplies foodbanks need	WDC has continued provide funding to support two local foodbank charities. The food banks have built strong a relationship with the Council. As such, this will enable regular monitoring of potential impacts or shortages and allow concerns to be raised using appropriate and recognised channels.
		Consider the level of social	
		welfare funding available	Regular campaigns to encourage donations to West Dunbartonshire
		against potential need (W4U -	Community Foodbanks is ongoing. Activity on the Intranet to encourage
		include consideration of fuel poverty)	officers to donate and highlighting thanks for those who have donated to keep the project relevant.
			Foodbooks continue to have sufficient stock cumplies and manay to
		Continued engagement with	Foodbanks continue to have sufficient stock supplies and money to purchase stock if it was to run low. They have highlighted that their social
		local food banks	media campaigns have typically led to upsurge in donations, which continues to be the case. The group has contact with the Communities Team with regards community budgeting grants.
			Working 4U liaise with local organisations (foodbanks and third sector
			organisations) providing access to low cost cafes and support for 'food on a budget' for people with limited resources. However, restrictions introduced as a result of Covid-19 has reduced the number of community-based cafes and
			lunch clubs. The aim is to work with key organisations to develop an action plan that will
			include action to:
			 Raise awareness of the need for services;
			promote availability of food and services;

Broad Risk	WD Impact	Action	Comments
Fuel Supply Disruption Increased unemployment as a result of economic disruption	- Potential requests for Council Resources - Potential impact on Council reserves - Greater number of people in receipt of benefits with additional knock-on demand for support services. Including welfare/debt advice, employability	Roads / Transportation to consider ensuring Council reserves are at optimal levels and processes in the event of requests from partner agencies Working 4U will work with strategic partners to ensure information about access to services is widely available Continued review of services to ensure increasing areas of demand are addressed	 maintain/increase supplies of food and donations to the organisations (from individuals, local business, public and third sector organisations; Support access to additional funds for the provision of food. Covid-19 Food insecurity Group was established to address emergency food demands. This infrastructure will remain intact for the near future and will be used to extend support to those affected by the impact of EU Exit/Covid 19. As part of planning for a no deal, the UK and Scottish Government assumptions suggested there would not be an impact on fuel levels, etc. A Trade and Cooperation Deal has been agreed therefore, there are no immediate concerns. However, we will continue to monitor. Working 4U will coordinate efforts of service providers through joint working with strategic partners in: The West Dunbartonshire Information and Advice Partnership The local strategic employability group
Certain types of fresh food may decrease	support and discretionary welfare payments - Potential additional costs for	Short term: Consider earmarking additional	WDC 20-21 budget for supply of food to Education and HSCP is set. Risk of additional costs.
/prices of certain foods many increase	services/that purchase/supply foods to increase by	resource, or consider use of prudential reserve if required	The risk of cost increases arising from EU-Exit has been advised to Council in the budget preparation reports since October 2018. The budget report
	up to 20% due to	Long term: Consider building	advises that any price variations will be reported and that it is expected that

Broad Risk	WD Impact	Action	Comments
	tariff changes,	in additional costs into the long	the Council would manage such price variations should they arise through
	sterling depreciation	term finance strategy based on	ongoing budgetary control and, if necessary, use of free reserves. This will
	and boarder disruption	evidence post- EU Exit	continue to be monitored. We have not yet seen any arising costs.
	- Impacts on food		Facilities Management maintain a very limited stock of tinned and dried food
	provision at schools,		that is maintained year round, in case of single premise emergencies – while
	care homes, etc		this is not EU Exit specific, it could be utilised in the event of a localised issue being experienced.
			In line with Scottish Government and CoSLA advice, there is no intention to stock pile beyond this contingency as storage capacity as freezer space
			prohibits this. In addition, nursery and school meals are produced in line with national legislation which details nutrient requirements. Most meals are therefore produced using fresh fruit, vegetables and other produce which has an extremely limited shelf-life and is not suitable for stock-piling.
			In addition, considerable work has been undertaken by Scotland Excel to engage with suppliers in an effort to ensure a robust supply chain where at all possible.
			If we started to see local shortages catering managers and cooks have their own procurement cards, which they presently use to purchase provisions via Scot Exel Suppliers however, the cards can also be used elsewhere if necessary.

Information & Data Sharing – Stella Kinloch January 2021			
Broad Risk WDC Impact(s) Action Comments			
Disrupt in flow of	- Delay in PVGs,	Seek information / assurance /	Scottish Government Update in relation to PVGs is as follows:

	Information & Data Sharing – Stella Kinloch January 2021			
Broad Risk	WDC Impact(s)	Action	Comments	
personal data due to legal requirements affecting law enforcement / intelligence sharing between UK & EU	significant impact on teaching & care staff - SSSC registration requirements	guidance from Scottish Government	"Disclosure Scotland currently uses arrangements under the Directive and Council Decision to request information from 12 Member States for nationals of those Member States to work in childcare positions in Scotland. If the UK should leave, the EU without a deal then the arrangements will end. In the short-term, recruiting organisations will have to make use of certificates of good conduct provided by the individual. Disclosure Scotland is not involved in that process. PVG disclosure requests will rely on information held in UK records only, and will be handled in line with the 14-day service level target".	

	Demonstrations & Disorder – Local Police Division – January 2021			
Broad Risk	WDC Impact(s)	Action	Comments	
Increase in protests in relation to: EU Exit - Irish / Northern	Increased license requestsLack of Police /	Ensure awareness with relevant Leads / Officers for this.	Police Scotland were planning for the potential increase for demand for public order policing for demonstrations and protests in relation to EU Exit – nothing transpired.	
Irish tension - Economic Instability	Partner resourcing to events		Continued local engagement through West Dunbartonshire & Argyll and Bute Local Resilience Partnership.	

		Workforce – Stella Kinloch/	Jen Watt – January 2021
Broad Risk	WDC Impact(s)	Action	Comments
Loss of staff – both highly skilled and lower skilled / entry level	- Impact on Care for People, Agency workers - Significant concern in Education regarding supply teachers, learning assistants, probationer allocations and officers with language skills -Potential risk if contracts are subcontracted companies employing EU-nationals	Signposting of key information / support in relation to EU Workers within the Council https://www.gov.scot/brexit/ Education is revising processes with regards recruitment to reflect guidance and in relation to engagement with universities on earlier allocation of probationers	EU Nationals have already been identified within the organisation, letters have been issued. Managers have access to a Right to Work report within HR21. A key element will be to offer continued engagement with all affected parties. Noting right to work at point of engagement is the evidence requirement. There is no requirement to insist on Settled Status for any EU employees – identifying those of EU origin maybe seen, as discriminatory therefore no further action is required by WDC. WMS records providing country of origin remain up to date. HR Assistance remains available to all employees who may require assistance with the application process. REG to consult with existing contractors to seek assurance of continued project plans or the contingencies they have in place. WDC HR has identified 31 employees with contractual obligation whose origin is EU or EEA. A full review of all employee roles and impact on each service area has been undertaken and there is a low risk to service delivery, as there are no unique or difficult to fill positions identified, nor one single service impacted significantly should EU nationals return to country of origin. HR Connect Section Head continues to monitor for any change notifications. Low numbers of employees were identified as EU nationals – support to apply for EUSS made available via HR Connect for advice and guidance. Discretionary funds etc are in place however, the citizen or employee will need to make a claim for EUSS as these are safety nets until the person meets the requirements. COSLA has raised concerns regarding the impact of COVID-19 restrictions on people's ability to access support with their EUSS applications this is particularly relevant for vulnerable groups. COSLA has
		9	

	Workforce – Stella Kinloch/Jen Watt – January 2021				
Broad Risk	WDC Impact(s)	Action	Comments		
Access to benefits Consider impact of loss of benefits arising from circumstances where low income groups and vulnerable people may be more affected by removal of EUSS on 30 June 2021.	 In terms of Workforce approx. less than 30 employees require EUSS. Impact to UC maybe the most severe flag with no recourse to public funds. 	Communications via HR Workforce to Managers and Employees direct via online comms. Link to Working 4U to ensure West Dunbartonshire wide comms highlights support and impacts on Benefits where EUSS is not in place by June 2021.	raised concerns with UK Govt and asked that Home Secretary to consider extending the EUSS deadline. The Council will continue to support and offer assistance to aid citizens and employees to complete their status application.		

	Economic Instability – Michael McGuinness – January 2021				
Broad risk	WD Impact(s)	Action	Comments		
Provision of	 Potential impact 	Communications and the web	Governments guidance has been provided regarding the transition phase:		
information to Local	that the local	team need to be ready to	https://www.gov.uk/transition		
businesses	business	respond proactively to any	https://www.prepareforbrexit.scot/		
	community will	messages that the wider	https://www.gov.scot/brexit/		
	seek sources of	Council needs to issue			
	information to	following Brexit. Promotion of	There are also number of online tools to support the Business community as		
	allow them to	good sources of information for	part of the transition from Europe. The Scottish Chamber, FSB, Business		
	adapt, following	local businesses to adapt to	Gateway and Scottish Enterprise provide a range of tools and guidance		
	Brexit and use	the new environment will be	support		
	up limited	provided.	https://www.scottishchambers.org.uk/press-releases/prepare-for-brexit/		
	resources of		https://www.fsb.org.uk/campaign/uktransition.html		
	Business		https://www.bgateway.com/support-to-prepare-your-business-for-brexit		
	Support		https://www.scottish-enterprise.com/support-for-businesses/trading-after-		
	delivering Covid		<u>brexit</u>		
	grants.				
The likelihood of an	- This presents a	Working 4U will work with	See above and page 5/6 relating to Increased unemployment as a result of		

	Economic Instability – Michael McGuinness – January 2021				
Broad risk	WD Impact(s)	Action	Comments		
economic crisis has	risk to our	strategic partners to ensure	economic disruption		
increased and will	workforce, our	information about access to			
have major impacts	communities	services is widely available			
on disposable	and local				
incomes and	economy. This	Continued review of services			
employability. The	will affect our	to ensure increasing areas of			
increased likelihood	vulnerable	demand are addressed			
means that an	communities				
economic is now more	and hinder local				
likely to occur	economic				
concurrently with	growth. This				
other risks	clearly presents				
	a challenge for				
	WD due to the				
	already high				
	rates of				
	deprivation and				
	unemployment.				
	There is also a				
	risk that				
	individuals may				
	require				
	additional				
	support as a				
	result of EU Exit				
	putting more				
	pressure on the				
	local authority.				

		Business Continuity – Je	n Watt – January 2021
Broad risk	WD Impact(s)	Action	Comments
Assess impact of EU- Exit on Business Continuity Plans	Potential disruption to services - Food - Medicines - Staff	WDC have undertaken a full review of all Business Continuity Arrangements Continuity Arrangements Continuing to engage with CoSLA and Scottish Government Dialling into COSLA teleconferences Concurrent Risk Workshop for key officers was held on the 17th November via MS Teams	Business Continuity planning remains an operational focus. Any changes will be reflected into the respective Business Continuity Plans. CoSLA requested LAs to complete a questionnaire to provide information relating to resilience structures, additional structures and areas of risk. This was complete and returned to CoSLA. CoSLA reinstated EU Exit calls; the Civil Contingencies Officer regularly dials into these meetings, to discuss any arising issues and requests from Scottish Government and CoSLA. A brief synopsis of the call is circulated to the contributing officers for information and consideration.
Notable risk of disruptive concurrent event (Disruptive Weather, COVID-19, local incident). Covid-19 has not reduced the risk from pandemic influenza, a novel emerging infectious disease and coordinated industrial action.	Many of our officers have worked tirelessly through this pandemic without much leave to date. This may lead to key officers being on leave (as required for wellbeing) as we prepare for the months ahead. Given the likelihood that we will be required to respond to multiple	WDC have produced a suite of Business Continuity Plans and an Essential Service_Key worker List Resilience Structures in place. Strategic and Operational Resilience Groups and Resilience Group.	SRG and ORG discussing allocation of leave, staggering leave for key roles and ensuring business continuity arrangements are robust. The National Coordination Centre (NCC) is live. The purpose of the NCC is to: • Address issues that cannot be managed at a local level that overwhelms local capabilities; • Identify potential trends e.g. shortages • All risk model Daily reports are produced to give an oversight of the most pertinent risks facing Scotland. E.g. Weather, Health Board Capacity, EU Exit, COVID-19.

	Business Continuity – Jen Watt – January 2021			
Broad risk	WD Impact(s)	Action	Comments	
	disruptive events at the			
	same time, this puts			
	significant pressure on			
	our resilience structures			
	and our ability to			
	respond.			

	Other Considerations - Stephen West, Vicky-Jane Hastings and Patricia Kerr – January 2021				
Broad Risk	WDC Impact(s)	Action	Comments		
EU Funds / Grants	- Ongoing projects, planned projects or staffing that are reliant on EU funding, either directly or indirectly through the Scottish Government	Both the UK and Scottish Government have provided written reassurance that ESF will be continued in current form until 2023	Under the UK Withdrawal Agreement Bill, the UK will continue to participate in programmes funded under the current 2014-2020 Multiannual Financial Framework (MFF) until their closure. As described in Articles 137 and 138 of the Agreement. This applies to all ESF,ERDF & ETC projects signed by end of 2020 with funding ending in 2023.		
Impact on the European Structural Fund	- Impact on outstanding allocations of structural funding committed by Managing Authorities under the 2014-2020 programmes	The previous UK treasury Guarantee was no longer required, following the UK Withdrawal Agreement Bill being approved, the previous guidance was withdrawn)	https://www.gov.uk/government/publications/continued-uk-participation-in-eu-programmes/eu-funded-programmes-under-the-withdrawal-agreement https://www.gov.uk/government/publications/new-withdrawal-agreement-and-political-declaration Hilary Pearce Head of European Structural Funds and State Aid Division is fully engaging with other Managing Authority heads across the UK and in relevant UKG departments to ensure her and her team are kept up to date with developments		

Other Considerations - Stephen West, Vicky-Jane Hastings and Patricia Kerr – January 2021				
Broad Risk	WDC Impact(s)	Action	Comments	
			The most recent letter providing clarification was issued by Hilary Pearce on the 27 th January 2020: 20200127 - Letter - HP to Lead Partners -	
Other Financial Considerations	-Impact of any fluctuations in the currency rate to expenditureImpact on future economic growth Impact on any regeneration projects and plans	Ensure council services purchasing though currency exchange remain within budget	Revenue spend Our transactions are in UK Sterling Pounds (£) but there may be an increase in the cost due to market fluctuations. WDC are subjected annually to an approx. 3% increase for many ICT systems. The actual increase is built into the budget each year, however due to exchange rate fluctuations there is a lack of certainty and this can lead to an overspend. See comments below re reports to Council on the budget-setting process and approach to managing this financial risk.	
			Capital spend (ICT) Again WDC transactions are in £ and there may be an increase in the cost if the market does fluctuate. For capital projects, WDC approach is to adjust the volumes to remain within budget as device prices change every 6 months on the frameworks anyway. WDC have in the past asked for capital funding approval to be accelerated from future years where we have an urgent requirement and have no budget left. Costs will be monitored and any variations reported through normal budgetary control processes, which highlight reasons for cost increases. This remains valid- Jan 2021 and several suppliers have advised of delivery lead time delays.	
Expenditure	- Impact of increasing inflation – costs to the council (excluding food): e.g. Energy costs; care	Monitor increases in costs of those identified as high risk/ high volume Monitor overall position	Energy bought in advance – short term risk minimal; however could have a longer term impact. The risk of cost increases arising from Brexit has been advised to Council in budget preparation reports since October 2018 and will continue to be	
	agency costs	through budgetary control	advised. The final budget report each year advises that any price variations	

	Other Considerations - Stephen West, Vicky-Jane Hastings and Patricia Kerr – January 2021				
Broad Risk	WDC Impact(s)	Action	Comments		
		process	will be reported and that it was expected that Council would manage such price variations should they arise through ongoing budgetary control and, if		
		SHORT TERM: consider	necessary, use of free reserves.		
		earmarking additional			
		resources at the year-end for			
		the risk; or consider use of			
		prudential reserve if required			
		short term.			
		LONGER TERM: consider			
		building-in additional costs into			
		the long term finance strategy			
		based on evidence post-Brexit			
Funding Support	- Impact to Council of	Monitor ongoing Brexit	Continue to monitor now a deal has been agreed.		
	chancellor revisiting the	discussions and potential			
	budget and affecting	impact on the councils			
	local government	finances & the wider			
	funding settlements	implications of the Scottish			
		economy			
Capital Receipts	- Capital Receipts do	Longer term vision on capital	Capital receipt opportunities are regularly considered at SAMG and PAMG.		
	not materialise or are lower than anticipated	programme for both income and expenditure levels	The Council will continue to monitor the housing market to monitor and react to any impact.		
	lower than antioipated		to any impact.		
		Regular Strategic Asset			
		Management Group updates feeding through to the capital			
		budgetary control report (to			
		both Council and CMT)			
1		,			
1		Capital Disposal Strategy with			
		longer term vision to allow			

	Other Considerations - Stephen West, Vicky-Jane Hastings and Patricia Kerr – January 2021				
Broad Risk	WDC Impact(s)	Action	Comments		
DIOUGINISK	WDO IIIIpaci(3)	movement in the assets due sold and timing of those assets Capital programme being monitored by CMT, Council and Committees on a regular basis Early identification of possible issues to allow action to reduce spend or identify further surplus assets for possible			
		surplus assets for possible disposal to minimise shortfall.			