NHS 24 - AMBER - CORPORATE RISK REGISTER (Correct as at 19/04/2022)

BOARD MEETING - 28 APRIL 2022

Case Ref	Receipt Date		Secondary Governance Committee	Description	Significant Impact	Executive Risk Owner	Strategy Type	Mitigating Action	Prev Score (AxB)	Score	Target Score (AxB)	Target Date
RPND/0 37063	24/10/2019	Planning & Performance	Committee Committee Committee	There is a risk that the NHS 24 would not be able to sustain a safe and effective response to significant additional pressure/demand on services due to current system and resourcing capacity limitations.	Potential delay in patient care due increased waiting times at peak periods. Impact on performance targets Additional pressure on staff.	Director of Service Delivery	Reduce	Mitigating Actions - Ongoing Clinical recruitment pipeline and recruitment plan in place to meet developing organisational and clinical supervision needs. (Ongoing). Ongoing Controls Application of the Corporate escalation framework that outlines triggers and actions required to support a sustained corporate response. This is supported and implemented through command and control arrangements within MT and Executive Escalation Group (Ongoing control) SMT work to review NHS 24 priorities and resource required to provide a sustainable plan to support Service Delivery during the winter period (Ongoing) Close liaison (weekly) with Scottish Government and key stakeholders through safe space meetings, sponsor meetings, RUC and COV D pathway meetings to discuss current performance, horizon scanning and opportunities for improvement. (Ongoing Control) Overview by NHS 24 MT/SMT to ensure cross directorate approach to provide organisational support. (Ongoing Control) Increased utilisation of remote clinical supervision and remote management (Ongoing Control) Weekly recruitment and training overview meetings to monitor and manage process (Ongoing Control) Mitigating Actions Complete Estate Strategy that meets recruitment/resource requirements through expansion of sites in the West and East of Scotland (Complete). 24/7 Technical on-call support to ensure any system issues are resolved quickly (Complete). Developed Management Team to support expanding workforce and services (Complete) Corporate escalation process to support frontline services, in line with ongoing review of organisational priorities and resource allocation/deployment (Complete) Technical assurance on system stability, flexibility and performance (Complete) Planning and communication for COP 26 (Complete)	16	16	4	01/07/2022
RPND/0 43987	24/03/2022	Planning & Performance Committee		There is a risk that when the goes out of support	NHS 24 will lose all support from relation to incident resolution, troubleshooting This could result in WFM application becoming a security vulnerability. If a catastrophic incident on this application occurred NHS 24's ability to create staff schedules and manage resource would be severely impacted.	Chief Information Officer	Reduce	1. Session with (inc Service Delivery) to discuss potential recommendations - Target completion April 2022 2. DTAG has this as the number 1 agenda item for a Joseph Looking at potential short term service wrap 3. Looking at potential short term service wrap 4. Full procurement exercise will be carried out in relation to either extension or replace 5. There is no development on planned - Target completion dependant on upgrade or replacement. (What do we currently pay Support, Maintenance & Licences) Completion of these will reduce likelihood and consequence by 3- Risk becomes 1	NEW	16	1	31/05/2022
RPND/0 43863	09/03/2022	Clinical Governance Committee	Planning & Performance Committee	There is a risk that, following the decommissioning of the COV D pathway, primary care is unable to meet the needs of the public which increases call demand to NHS 24's 111 service in the out of hours period.	Poor patient journey Negative impact on reputation	Director of Service Delivery	Reduce	Robust and Consistent National Communications in place (Ongoing) Changes made to IVR to support the changes in the pathway however a conscious effort to minimise change should the pathway be amended again at short notice (Ongoing) Ongoing daily intra-day level analysis of call arrival patterns and volumes to help quickly identify any changes to demand and/or volume (Ongoing Control) Continued use of NHS Inform to help direct callers to the appropriate service (Ongoing Control)	NEW	16	8	30/09/2022
38259	09/04/2020	Staff Governance Committee	Clinical Governance Committee	There is a risk that if NHS 24 experiences low levels of staff attendance over a prolonged period of time, this will negatively impact its ability to deliver clinical services and develop new and improved ways of working.	Prolonged waits to access services resulting in poor patient experience and reputational damage. Impacts negatively on staff morale, retention and wellbeing.	Director of Workforce	Reduce	Implementation of Attendance Improvement Plan (regular updates on progress being monitored by Staff Governance Committee). Action plan is being reviewed and updated for 2022/73. Key actions: 1. Wellbeing Managers are taking a proactive approach to new isolation guidance which will maximise attendance availability. (Ongoing - March 22) 2. Increased Formal Attendance Meetings to support line managers in managing attendance of their staff, signalling expectations to staff of the importance to attend work. 3. Communications Plan in place to promote a positive culture and help staff to understand implications of high levels of non-attendance at work (Complete-Implementation ongoing March 2022) - Review of communications for 2022/23 – TO BE NCLUDED N PLAN 4. Health & Wellbeing initiatives for staff to support by providing positive working environment, occupational health services and one to one support (Ongoing control). 5. Workplace Adjustment Policy in partnership with Business Disability Forum progressing recommendations (March 2022) 6. Phase 2 of Shift Review would align managers with teams to provide a more supportive and team working environment (Ongoing - 31 July 2022) 7. Continued promotion of LFT and PCR testing and vaccination programme with 90% of staff double vaccinated. 8. Ongoing Audit to be undertaken by Internal Audit of Attendance Management Processes (Ongoing - 31 March 2022) Mitigating Actions - Complete 1. Health & Wellbeing Strategy and Framework in place. (Complete) - Plan under review for 2022/23 2. Improved sickness absence reporting suite with improved access for managers (Complete). 3. Attendance at training and/or completion of el-earning modules by managers is monitored and a fortnightly report is published to show compliance and progress (Complete). Further plan of support and learning to be put in place for line managers, currently being developed with Wellbeing Team Managers. 4. Levelling sessions now in place and running on a regular basis to ensure auditing short and long	16	16	8	31/03/2023
RPND/0 43659	18/02/2022		Planning & Performance Committee		higher referral rate to Emergency Departments rather than improved direct	Director of Service Delivery	Reduce	Promoted by NHS 24's Head of Dentistry at the Scottish Government Directors of Dentistry meeting, as an opportunity to continue the SEDS service to deliver and support sustainable, safe clinical triage for whole system resilience (Ongoing). A paper is being produced for Scottish Government Sponsor team in pursuit of recurring funding for this service when COVID funding ceases (Ongoing - tbc). Extension to current GDP contracts funded via Advance Clinical Support and RUC budget (Ongoing control). Ongoing regular 1-2-1 meetings with Health Board Out of Hours Dental Services and clinical leads to align and support demand management with local capacity challenges (Ongoing Control)	NEW	12	4	31/08/2022
RPND/0 44024	29/03/2022		Audit & Risk Committee	There is a risk when the Service Delivery staffing requirement is known, there will be a gap between the current workforce and the actual number required and that gap will be unaffordable	NHS 24 do not have the budget to employ the full requirement of staff Benefits of shift review not utilised.	Director of Service Delivery		Development of Outline Business Case/Options Paper (April 2022) Phased implementation plan of preferred option in place (Ongoing) Early engagement with finance team (Ongoing)	NEW	12	4	30/06/2022

PND/0 (6	04/07/2021	Staff Governance Committee	Clinical Governance Committee	There is a risk that the benefits of the initial phase of the shift review are not fully realised without the successful deployment of the next phase (managers/dentists/pharmacists).	Challenging performance and workforce planning which negatively impacts ability to provide a sustainable service. Limits ability of NHS 24 to deliver desired outcomes from strategic delivery plan. Increased cultural issues associated with lack of teaming approach on front-line.	Director of Service Delivery	Reduce	Mitigating actions and controls Ongoing Engagement Sessions with staff are currently ongoing (Ongoing in line with Communications Strategy) Robust modelling in place to establish requirements, focusing on operational and managerial roles. (Ongoing Control) Project documentation developed for Stages 1(Managers) and 2 (Dentists/Pharmacists) including PID (Development Ongoing – target date for Stage 1 31 July 2022, target date for Stage 2 tbc) Mitigating Actions Complete Staff Engagement / Communications Strategy in place (Complete). Re-establishment of Shift Review Working Group with appropriate representation. (Complete – meeting weekly) Establish a Shift Review Governance Group (Complete – meeting fortnightly) Robust review and assessment of performance/Management Information data to ensure full understanding of organisational requirements (Complete). Shift Review Survey (Complete) External Focus Groups (Complete)	12	12	4	31/07/2022
PND/0 2 970	22/03/2022	Staff Governance Committee	Planning & Performance Committee	There is a risk that non frontline staff are anxious and do not have a clear sense of belonging due to the current uncertainty in relation to a potential return to the office/hybrid working model following a long period of predominately homeworking.	Low morale, decreased productivity. Increased attrition/sickness absence Ability to recruit impacted by offerings from other organisations for remote working/based anywhere in Scotland/UK. Negative impact on work life balance	Director of Workforce	Reduce	Mitigating Actions Ongoing Once for Scotland national flexible working location in development (Sept 2022) Digital desk booking system being procured (June 2022) Ongoing Controls Support from line manager, EAP, Occ Health (Ongoing Control) Wellbeing Group and Strategy in place (Ongoing Control) Wellbeing resources on intranet (Ongoing Control) Support from line manager, EAP, Occ Health (Ongoing Control) Mitigating Actions - Complete Agile working group and policies in place (Complete Feb 22) Dedicated intranet page for agile working (Complete Feb 22) Survey to all staff (anonymised) to determine preferences for return in terms of no of days, location, seating (Completed March 22)	NEW	12	8	30/12/2022
 PND/0 1	18/02/2022	Clinical Governance Committee	Planning & Performance Committee	public health consequences, there is consequential increased complexity of presenting symptoms to	Increased service demand and clinical complexity leads to increase in average handling time in SEDS service. This in turn, impacts on volumes of subsequent referral to Board Out of Hours Dental Service where resource has remained static despite significantly increased demand over the past 2 years.	Director of Service Delivery	Reduce	Ongoing integration of general dentist practitioners to expand expertise during COV D pandemic to support more clinically complex and high risk presentations using video consulting has increased safety of patients (Ongoing - timescale tbc).	NEW	12	3	31/08/2022
PND/0 (08/07/2021	Staff Governance Committee	Planning & Performance Committee	There is a risk that the rapid growth of NHS 24's front facing operational function outpaces the growth in corporate service functions which are required to support it.	Corporate functions which support operational delivery become overwhelmed and error rates increase. Corporate staff become demotivated and sickness absence increases Corporate staff are not able to keep pace with demand for essential management training of managers and staffs confidence in our leaders is diminished as a result No capacity within corporate service functions to expand and build skillset toward omnicompetence to ensure resilience in their service delivery	Director of Workforce		Mitigation - Ongoing 1. Establishment Control process and panel approved by EMT in February 22. Group to meet by end of March 2022. 2. Workforce Directorate review of structures (Ongoing - 31 Mar 22) 3. Director level portfolio function review (Ongoing - 31 August 2022) 4. Development of future workforce plan by the Strategic Workforce Planning Group to provide clarification of organisational requirements ensuring right people with the right skills are in the right place at the right time (Ongoing - 31 August 2022) 5. Development of an operational workforce planning group – established Nov 21 with a 6 month work plan (Ongoing - May 2022, now extended to June 2022.) 6. Established the group however stood down at present to allow focus by Service Delivery on festive/winter. 7. Extension of temporary resources with Workforce to support two key areas of risk which now equates to 7 Agency / Fixed Term staff to support volume recruitment and attendance management (Ongoing – June 22) Mitigation - Complete 1. Strategic Workforce Planning Group established and meets bi monthly; monitoring will uncover gaps (Complete) 2. UK Benchmarking of OD, Leadership & Learning to understand best practice and to identify staff to customer ratios (Complete - scheduled for publication 30 Sept 21) 3. Finance agreed budget availability for resource to support (temp/agency/perm) (Complete). 4. Bid submitted to Scottish Government to support resourcing (Submission date 03/09/2021). 5. ICT Restructure (Complete - 31 December 2021) 6. Interim Agile working policy approved Dec 21 to empower employees to work agilely, where appropriate in the context of business needs (Complete). 7. Skills and competency mapping across organisation to understand the gaps (Complete)	12	12	6	30/09/2022
 PND/0 (02/07/2021	Planning & Performance Committee		Digital Services Resilience: There is a risk to the availability and integrity of the digital services provided by NHS 24 such as NHSInform, Care Information Scotland, Breathing Space etc.	this risk could result in the web services being unavailable for a significant period of time or for the information provided through these sites being inaccurate. The impact of this risk could result in: 1) Adverse publicity and reputational damage to NHS 24 from any extended downtime for these services 2) Patient safety by following incorrect advice on altered Self Help Guides		Reduce	The actions detailed below will mitigate the risk reducing the Consequence by 2 and the Likelihood by 1. 1)Consider migration of web site to alternate supplier : 2) Schedule monthly vulnerability assessment	12	12	4	30/06/2022
PND/0 2 278	29/09/2021	Planning & Performance Committee	Audit & Risk Committee			Chief Information Officer	Eliminate	1. Engage with BT for a support model process for initial period of 12months until we have agreed future state 2022 (L) 2. Identity which activities can be undertaken by NHS 24	16	12	1	30/06/2022

3 RPND/0 43988	24/03/2022	Planning & Performance Committee		BT do not	If NHS 24 Telephony Infrastructure Team	Chief Information Officer	Reduce	Agree a support model and SLA's with BT - Target completion April 2022 (L) for BT to support - Target completion May 2022 (L) Handover of knowledge from NHS 24 voice specialists to BT - Target completion date May 2022 (C) Completion of these will reduce likelihood by 3 and consequence by 1- Risk becomes 2	NEW	12	2	31/06/2022
4 RPND/0 43861	09/03/2022	Staff Governance Committee	Clinical Governance Committee	There is a risk that NHS 24 does not make progress quickly enough, as pandemic measures are stood down, in relation to improving completion rates of statutory/mandatory training and the reintroduction of structured CPD opportunities.	Knowledge/skills gap created impacts role performance, potentially impacting patient safety. Staff wellbeing is impacted as feeling vulnerable, due to not having right tools/skills to undertake role competently. Staff who do not feel they are being developed personally are more likely to leave, impacting our attrition rates. Reputational damage if staff not trained to a certain standard.	Director of Workforce	Reduce	Mitigating Actions - Ongoing 2. Conduct an organisational review of training structures and content. (SEPT 22) 3. Explore most effective structures for administering and delivering training. (NOV 22) 4. Devise an easily accessible Prospectus. (NOV 22) 5. Devise approach to aligning CPD protected learning time to new approach to training (including mandatory) and CPD. (NOV 22) 6. Review and refresh Corporate Induction. (NOV 22) 7. Publish Training Calendar. (DEC 22) Mitigating Actions - Complete 1. Formation of a Training Project Team and a Training Project plan. (COMPLETE)	NEW	12	8	30/12/2022
15 RPND/0 39878	29/12/2020	Clinical Governance Committee	Planning & Performance Committee	There is a risk that NHS 24's Public Protection Team are unable to maintain and discharge all public protection responsibilities due to current resources not meeting demand and the expected further increase in demand following the expansion of frontline services.	Not all the necessary and relevant information available at NHS 24 will be shared with the agencies/partners potentially putting vulnerable children and adults at risk. Reputational risk should NHS 24 be unable to discharge all public protection duties. NHS 24 at the moment is viewed by partner agencies as an organisation that delivers against their core requirement and adds real value to the wider Public Protection whole system approach	Director of Nursing & Care	Reduce	Public Protection Team have prioritised existing resources on referral management (3.0 WTE Band 7 Nurses) / 2.8 WTE Band 4 Administrators (Complete) Public Protection Processes have been reviewed to ensure maximum efficiency (complete) Additional hours sanctioned to give surge capacity (complete) Business case for additional resources objectively reflecting the additional demand in train for tabling at EMT (30/07/2021) Daily review and assessment of workload (Ongoing Control) Nurse resource supporting administration processes (Ongoing Control) Ongoing review across organisation to identify any available resource for a short term period (Ongoing Control) Recruitment of additional resource (Ongoing - 31 June 2022)	9	12	3	29/07/2022
6 RPND/0 38901	03/08/2020	Staff Governance Committee	Planning & Performance Committee	There is a risk that gaps in specific skills and capacity across the digital team are impacting the ability to deliver strategic objectives. Risk relates to NHS 24's ability to recruit and retain quality candidates to recruit into specialist roles.	Objectives are not met and service development and improvement is negatively impacted. Quality of work impacted by not having sufficient collaboration input from specific expertise within NHS 24 Delay or non delivery of milestones within change portfolio and/or remobilisation plan. Developments don't deliver in line with user needs causing reputational damage	Chief Information Officer	Reduce	1. As part of Digital team transfer to ICT, revised Digital Front Door Business Case in development - Target completion April 2022 2) Review and reallocation of workloads to reflect prioritisation of work (Complete - initial phase 31 August 2021) COMPLETE / BAU Ongoing controls: 3) Working with other key teams across the organisation to identify pinch points and plan ahead need for resource to input at particular times. COMPLETE / BUA 4) Ongoing controls: Cross Directorate working and planning through SMT to ensure an ongoing shared understanding of organisational priorities. COMPLETE / BAU 5) Ongoing controls: Ongoing PMO recruitment to support Digital delivery projects and programmes. Target completion: Key dependency on Service Development / PMO 6) Full review of workload and available skillsets, roadmap activity underway as part of transferring into ICT.	12	12	4	30/06/2022
7 RPND/0 42971	02/12/2021	Planning & Performance Committee	Audit & Risk Committee	There is a risk that due to the high degree of financial uncertainty at a national level, NHS 24 do not receive the 2022/23 funding settlement (or funding decisions delayed into the new financial year) required to deliver on its strategic objectives.	NHS 24 will not be able to deliver on all its strategic objectives. Strategic planning will be negatively impacted or delayed.	Director of Finance	Reduce	Mitigating Actions - Ongoing Submission of financial plans to Scottish Government (Complete), supported with ongoing dialogue to confirm NHS 24 and Scottish Government's agreement on planning assumptions (Ongoing) Confirmation of breakdown of NHS 24's allocation (Ongoing) Mitigating Actions - Complete Secured recurrent funding in place for mental health (Complete) Mitigating Ongoing Controls SPRA process in place to enable prioritisation for use of funding to ensure balanced budget (Ongoing Control) RMP4 and SPRA as a vehicle for getting commitment for funding of strategic priorities (Ongoing Control) Continued engagement and representation at the appropriate forums to influence/inform decision making in relation to urgent care, mental health, health and social care priorities etc. are (Ongoing Control) Continued monitoring of performance and governance processes in place to evaluate and enable quick decisions if the funding landscape changes (Ongoing Control)	12	12	8	30/06/2022
RPND/0 44131	11/04/2022	Staff Governance Committee	Planning & Performance Committee	There is a risk that without a change to national guidance NHS 24 are unable to effectively manage staff absence related to covid-19.	Negative impact on staff morale, staff retention and wellbeing. Staff absence leads to prolonged wait times to access services resulting in poor patient experience and reputational damage	Director of Workforce	Eliminate	Managers currently managing Covid-19 Special leave in line with the principles of the Attendance Management Policy. (Ongoing control) Long COVID Questionnaire and Guidance in Place to ensure appropriate support in place for staff (Ongoing - tbc). Continue to raise awareness at all appropriate national forums (Ongoing Control)	NEW	12	1	30/06/2022
9 RPND/0 42273	28/09/2021	Planning & Performance Committee	Audit & Risk Committee	There is a risk that services are susceptible to an external	This would result in a significant availability issue to services	Chief Information Officer	Reduce		12	12 ↔	6	31/05/2022
20 RPND/0 41263	07/06/2021	Planning & Performance Committee	Audit & Risk Committee	There is a risk that NHS 24 Corporate devices may be compromised through vulnerabilities in home networks and home devices.	Unmanaged therefore perhaps potentially insecure home devices and network may result in an NHS 24 corporate device being compromised which then allows for malicious content to be introduced to NHS 24 estate. This may compromise the integrity, confidentiality and/ or availability of the information and services resulting in significant impact to service delivery.	Chief Information Officer	Reduce	1) Ensure corporate device is fully patched 2) Ensure that Corporate endpoint firewall is always on 3) Ensure all corporate devices are fully patched	12	12	8	30/06/2022
21 RPND/0 37593	07/01/2020		Audit & Risk Committee	There is a risk that undetected Advanced Persistent Threats may be introduced to NHS 24 environment.	Possibility of significant cyber incident (SEPA)	Chief Information Officer	Reduce	Investigation with BT, NHS Scotland Cyber Security Operations Centre, Risk becomes retained	12	12	8	30/06/2022

23	37567	06/01/2020 11/01/2022	Planning & Performance Committee Planning & Performance Committee	Audit & Risk Committee Audit & Risk Committee	There is a risk that malicious software or devices could be used There is a risk that without the successful implementation of appropriate controls,	Malicious software may be used to enumerate or access services and files published on our network This would impact the confidentiality and integrity by allowing NHS 24 information to be removed from the estate.	Chief Information Officer Chief Information Officer		retained The actions detailed below will mitigate by reducing the likelihood of this risk occurring.	12	12	8	30/09/2022
24	RPND/0 37596	07/01/2020	Planning & Performance Committee	Audit & Risk Committee	There is a risk that malware is introduced from the Internet to the NHS 24 estate via web browsing activities from any desktop, laptop or server asset	Possibility of significant cyber incident resulting in reduced ability to deliver 111 services and/or integrity and loss of confidentiality of sensitive data	Chief Information Officer	Reduce	Enable SSL inspection on appropriate categories 5) Deny internet access to assets that do not require it retained	12	12	8	30/06/2022
25	RPND/0 37590	07/01/2020		Audit & Risk Committee		Reduced ability to deliver 111 services. Increased risk of a significant cyber incident.	Chief Information Officer	Reduce		12	12	8	30/06/2022
26	RPND/0 38255	09/04/2020	Staff Governance Committee	Planning & Performance Committee	There is a risk that NHS 24 are unable to fully support all health and wellbeing needs of staff due to pace and scale of change and growth of the organisation.	Staff feel unsupported and sickness absence rates increase as a result. Recruitment and retention of staff negatively impacted. Increased management time spent on sickness absence management, removing from other management responsibilities	Director of Workforce	Reduce	Mitigating Actions - Ongoing 1. Retention Recover Plan (Ongoing - tbc) 2. Implementation of the Wellbeing Strategy, Framework and action plan developed to support staff across a number of areas including: 3. Undertaking a review of Occupational Health Service (March 2022) 4. Promotion of training and resilience (March 2022) - Develop wellbeing communications plan/wellbeing hub on intranet (Complete - actions being progressed March 22). Updated and review actions for 2022/23 as part of Wellbeing Plan. 5. Establishment of measure to assess impact of wellbeing initiatives on workforce (Ongoing - March 2022) - Part of review of Wellbeing Plan for 2022/23 6. promotion of wellbeing initiatives (Ongoing Control) - ongoing as part of 2022/23 Healthy Working Lives Plan and review of Wellbeing Action Plan. 7. Working to embed a healthy working environment that relates to all aspects of our staff's lives (Ongoing Control). Progress being closely monitored by Staff Governance Committee. 8. Review of use of Thrive app to be undertaken at the end of March 2022. Mitigating Actions - Complete 1. Staff wellbeing work stream in place. A group is established to support the management/co-ordination of activity. 2. Outputs feed into the MT/P P (Complete). 3. Staff wellbeing been incorporated into the Health, Safety & Wellbeing Committee (Complete) 4. Launch of new Wellbeing 'Thrive' App (Feb 2022) (Complete)	12	12	6	31/07/2022
27	RPND/0 41505	04/07/2021	Planning & Performance Committee	Clinical Governance Committee	There is a risk that the combined implementation of Connect Programme phase 1c and impacts on delivery of NHS 24 clinical services due to the amount and timing of system 'down time'.	unable to answer calls from the public	Chief Information Officer	Reduce	Fixed Schedule Plan for system changes/downtime in line with resource planning (Minimising downtime max service availability) (Ongoing - Phase 1a and b by December 2021 and Phase c by March 2022) (acknowledging dependency on supplier) Complete / Ongoing controls Review/Health check and Recovery Plan for Connect Programme (Complete). Clear communications plan in place for internal/stakeholder comms. Weekly planning meetings in place (Ongoing) Programme Governance Framework in place with service delivery representation to provide ongoing scrutiny of programme design and delivery (Ongoing control) Weekly joint meeting with ICT Ops/Connect Programme and Service Delivery to review downtime schedule and proposed schedule (In Place) to provide assurance from IT/PMO colleagues in relation to plans/processes in place. Ongoing Testing of user experience prior to implementation of changes incorporated into project plans. (Complete) Implementation (Ongoing control) Increase in frontline staff numbers to counter the reduced performance times (Dec 2021 then pipeline thereafter) NON ICT RISK Completion of these will reduce C by 2 & L by 3 - Risk becomes retained	10	10	5	30/06/2022