Agenda Item No. 5

THE VALE OF GLAMORGAN COUNCIL

CABINET: 7TH SEPTEMBER, 2023

REFERENCE FROM GOVERNANCE AND AUDIT COMMITTEE: 17TH JULY, 2023

"221 CORPORATE RISK REGISTER QUARTER 4 UPDATE (CX) –

The report, presented by the Director of Corporate Resources, provided Members with an overview of the Corporate Risk Register for Quarter 4 (April 2022 – March 2023).

The Corporate Risk Summary Report (Annex A) provided an overview of all the corporate risks in the Register in terms of their inherent score, effectiveness of control score and residual score and provided an outline of the direction of travel for both current and forecast. It also provided a brief analysis of the emerging risk issues associated with risks on the Register.

It was reported that there were 17 corporate risks on the Register. During the Quarter 4 period, 6 risks had scored high, 3 risks medium-high, 7 risks medium and the remaining 1 risk scored a medium-low. There had been some movement in risk statuses during the fourth quarter of the year. The high-risk status (risk score of 12) of Project Zero risk reflected the challenging circumstances that the Council was currently operating in. By contrast the Brexit risk had decreased to a medium status (risk score of 6).

In terms of forecast direction of travel, it was anticipated that the Information Security, Financial Fragility, Market Fragility, Workforce, Project Zero, Demand Management and Service Capacity would continue to escalate over time. It was also anticipated that the legislative change and local government reform, integrated health and social care and Brexit risks would continue to diminish over time. The remaining risks on the Register were forecasted to remain static.

Councillor M. Hooper raised a series of questions, the first related to the direction of travel and the impact of budgetary pressures. Councillor Hooper also referred to Project Zero which had a very high-risk status and he queried as to whether the status should be revised to catastrophic given the challenges associated with the project. In addition, Councillor Hooper referred to the cost-of-living crisis and inflationary pressures and whether the static risk was still appropriate. Finally, Councillor Hooper asked whether the Brexit risk was reflective of current issues as most areas would be covered under other risks within the Register.

In reply, the Director of Corporate Resources advised in regard to financial fragility, the Council was forecasting an increase in risk over time, and it had been recognised that the 2023/24 budget setting process would be extremely challenging and a report on that would be presented to the next Cabinet meeting. The forthcoming year's budget would be challenging because of such things as escalating costs of supplies and the increased complexity of people presenting for Council services. As the setting of the Welsh Government's budget in December would be closer, the Council would have a better idea of the financial challenges upcoming. With regard to Project Zero, Councillor Hooper was correct in that the next level up on the risk framework would be catastrophic and at present it was considered that the risk was very high, which in some ways would be offset by the effectiveness of the controls in place for a wide range of activities. Therefore, the inherent nature of the risk would need to change as would the Council's ability to affect control in order for the status to change to catastrophic. Regarding the cost-of-living crisis, there had been a lot of discussion at the Insight Board and Strategic Leadership Team where it was considered that the current status was correct. However, it had been recognised that the winter period would be challenging for residents so that risk would be kept under close scrutiny. In terms of Brexit, the Director stated that the Committee had previously suggested that the impacts would be articulated throughout the rest of the Register but the Brexit risk had remained because there were some legacy issues. For example, there were still some trading arrangements that needed to be finalised and that was still impacting on the Council but the majority of impacts had been covered and so it may well be time to remove Brexit from the Risk Register which was something that the Governance and Audit Committee could recommend to Cabinet.

Mr. N. Ireland (Vice-Chair and Lay Member) asked for clarification regarding the effectiveness of controls scoring mechanism. Mr. Ireland commented on the Brexit risk, and he stated that he agreed that the majority of issues would be probably covered elsewhere. Mr. Ireland also referred to Project Zero and the current risk score and he asked at what point would a review conclude that the objectives of Project Zero were unachievable. In reply, the Director of Corporate Resources stated that in terms of the effectiveness of controls score, it was a notional calculation that was made by looking at the ability of the controls to influence both the impact and the likelihood scores. With regard to the Project Zero risk, the Director stated that that would be influenced by the Council's data return to be submitted to Welsh Government over the next couple of months and as part of that analysis, Welsh Government would be able to understand some of the scale and national challenges being faced. Therefore, the Council would be able to better understand the areas of activity that it needed to look at, so that would be the next major driver of a review of the overall risk rating.

Mr. M. Evans, (Lay Member) stated that he supported the removal of Brexit from the Risk Register and he queried whether the Council had been exposed to the recent "Move It" vulnerability. In reply, the Director stated that he would check with his colleagues within information security and would provide an answer to Members via email.

Councillor Hooper referred to comments related to Project Zero and stated that the Council should not shy away from classing the status as catastrophic as the accurate position needed to be reflected. In support of Councillor Hooper, Councillor J. Protheroe commented that the picture around Project Zero for all public sector organisations was challenging, particularly in relation to the reduction of carbon emissions and the risk rating of catastrophic was actually what was happening. In reply, the Director stated that he would be happy to provide feedback directly to the Project Board.

Mr. G. Chapman (Chair and Lay Member) stated that a catastrophic status for Project Zero would not show a sign of weakness and it was important for the Council to reflect the issues at hand. The Chair commented on financial fragility and he referred to Welsh Government legislation regarding social care and children looked after and the impact on private sector providers of residential care placements which should be something that needed to be flagged up within the Register. In reply, the Director stated that he would feed back issues to Social Services, and he was aware that the issues were being considered and progressed with the Transformation Programme within Social Care which was led by the Director of Social Services. There was also a workstream being looked at around capacity planning and plans were in place to develop provision within the care sector for looked after children but a further update on this could be provided on the next Risk Register update.

Subsequently, the Committee

RESOLVED –

(1) T H A T the Quarter 4 position of corporate risks (April 2022 – March 2023) as outlined in the risk Summary Report (Annex A) to the report be noted.

(2) T H A T the comments of the Governance and Audit Committee be referred to Cabinet for endorsement at the meeting when Cabinet will consider a report on the Corporate Risk Register for Quarter 4, the comments of the Governance and Audit Committee being:

- For consideration to be given to the removal of Brexit from the Risk Register given that most impacts are incorporated under other themes and Risks.
- For Cabinet and the Project Zero Board to give regard as to whether Project Zero should be attributed a risk impact status of catastrophic, given the seriousness of meeting challenges associated with implementation. The Council should also not shy away from attributing a catastrophic status.
- For further consideration to be given to the impact on the capacity on Looked After Children residential care placements and new legislation from Welsh Government, particularly in relation to private sector providers and market fragility.

<u>Reason for decisions</u>

(1&2) Having regard to the contents of the report and discussions at the meeting."

Attached as Appendix – Report to Governance and Audit Committee: 17th July, 2023

VALE of GLAMORGAN
BRO MORGANNWG

Agenda Item: 4

Meeting of:	**Governance and Audit Committee**
Date of Meeting:	**Monday, 17 July 2023**
Relevant Scrutiny Committee:	Corporate Performance and Resources
Report Title:	Corporate Risk Register Quarter 4 Update
Purpose of Report:	To update Governance and Audit Committee on the quarter 4 position of Corporate Risks for April 2022-March 2023 contained within the Corporate Risk Register as outlined in the Corporate Risk Summary Report.
Report Owner:	Rob Thomas, Chief Executive
Responsible Officer:	Tom Bowring, Director of Corporate Resources
Elected Member and Officer Consultation:	Consultation has been undertaken with designated Corporate Risk Owners and the Strategic Leadership Team.
Policy Framework:	The proposals are within the Council's Policy Framework.

Executive Summary:

- This report provides members with an overview of the Corporate Risk Register for Quarter 4 (April 2022-March 2023).

Recommendations

1. Note the Quarter 4 position of corporate risks (April 2022-March 2023) outlined in the Risk Summary report (**Annex A**).
2. Refer any other comments to Cabinet for their consideration and endorsement at the meeting when Cabinet will consider a report on the Corporate Risk Register for quarter 4.

Reasons for Recommendations

1. To identify the quarter 4 position of corporate risks across the Council and highlight any emerging issues and actions to be taken as outlined in **Annex A**.
2. To ensure Cabinet receives the comments of the Governance & Audit Committee when considering the quarter 4 risk position.

1. Background

1.1 Corporate Risk is managed via the Corporate Risk Register. To supplement this, a risk analysis in the form of a Corporate Risk Summary Report (Annex A) provides a more concise way of identifying the headline issues and risk considerations. In presenting the information in this way, it enables officers and Members to be able to have a good overview of the status of risks across the Register as well as the emerging issues.

2. Key Issues for Consideration

2.1 The Corporate Risk Summary Report (**Annex A**) provides an overview of all the corporate risks in the Register in terms of their inherent score, effectiveness of control score and residual score and provides an outline of the direction of travel for both current and forecast. It also provides a brief analysis of the emerging risk issues associated with risks on the Register.

2.1 There are 17 corporate risks on the Register. During the quarter 4 period, 6 risks scored high, 3 risks medium-high, 7 risks medium and the remaining 1 risk scoring a medium-low .

2.2 There has been some movement in risk statuses during the fourth quarter of the year. The high risk status (risk score of 12) of Project Zero risk reflects the challenging circumstances we are currently operating in. By contrast the Brexit risk has decreased to a medium status (risk score of 6).

2.3 In terms of forecast direction of travel, we anticipate that the Information Security, Financial Fragility, Market Fragility, Workforce, Project Zero, Demand Management and Service Capacity will continue to escalate over time.

2.4 We anticipate that the legislative change & local government reform, integrated health and social care and Brexit risks will continue to diminish over time. The remaining risks on the Register are forecast to remain static.

3. How do proposals evidence the Five Ways of Working and contribute to our Well-being Objectives?

3.1 Risk Management is an intrinsic part of corporate governance and integrated business planning which underpins the delivery of the Council's Corporate Plan and its Well-being Outcomes. Our Corporate Plan has been structured around the Well-being of Future Generations (Wales) Act 2015, through the development of four Well-being Outcomes and eight Well-being Objectives. By aligning our Well-being Outcomes in the Corporate Plan with the Well-being Goals of the Act, this will enable us to better evidence our contribution to the Goals.

3.2 Corporate Risks are considered in the context of the Well-being of Future Generations in terms of their potential impact on our ability to deliver /meet the Well-being Goals. The multi-faceted nature of risk means they have the potential to impact on how we deliver our priorities within the Corporate Plan and ultimately impact on our ability to meet/deliver on the Well-being Goals. A failure to identify the different facets of risk and mitigating actions using the five ways of working puts us in a more vulnerable position in terms of our ability to manage the risks and could significantly impact on our ability to evidence our contribution to meeting the Well-being Goals into the longer term. For example, the Welfare Reform risk cuts across five of the seven Well-being Goals in relation to a Prosperous Wales, A Resilient Wales, A Healthier Wales, A More Equal Wales and a Wales of Cohesive Communities with multiple aspects of risk associated with Welfare Reform that have the potential to impact on our ability to contribute to these Goals. For instance, the social impact of welfare reform could impact on tenant's health and their ability to heat their homes, live in good quality housing, and feed themselves which directly impacts on the Healthier Wales and Cohesive Communities Goals. Equally there is the risk that welfare reform could have a detrimental impact on citizen's finances and their ability to sustain tenancies, access employment opportunities and pay bills. Collectively these could have an impact on our ability contribute to developing a Resilient Wales, Prosperous Wales, a More Equal Wales, and Cohesive Wales Goals.

3.3 The five ways of working are also a key consideration in relation to our corporate risks as a key part of managing the risk involves developing a Risk Management Plan that identifies the mitigating actions that have a focus on the long term, prevention, integration, collaboration and involvement.

4. Climate Change and Nature Implications

4.1 Within the Risk Register there is a corporate risk referred to as Project Zero. This corporate risk is defined as the failure to reduce our carbon footprint and mitigate against the impact/effects of climate change. The Project Zero risk identifies a wide range of climate change/nature related risks that are monitored and reviewed every quarter to ensure they reflect any emerging areas of risk/issues. The Project Zero risk has a Risk Management Plan that contains all risk related actions that will be undertaken during the year in order to further mitigate the associated risks and impact on climate change and the nature emergency. These risk actions are aligned to our Service Plans and the Annual Delivery Plan, which in turn are aligned to the Council's climate change programme of work known as 'Project Zero' and the associated climate change challenges as outlined in the Climate Change Challenge Plan. Monitoring risk in this way enables us to not only assess progress being made in relation to risk activity, but to also understand its contribution to the wider Project Zero programme.

4.2 Monitoring the Project Zero risk also provides an opportunity throughout the year for officers to consider any further mitigating actions that will enable us to further minimise the adverse consequences of our activities.

5. Resources and Legal Considerations

Financial

5.1 Managing and reducing risks effectively helps to prevent unnecessary expenditure for the Council, reduces the potential for insurance claims and rising premiums.

Employment

5.2 There are no direct workforce related implications associated with this report. However, there are risks contained within the Register that if not effectively managed has the potential to impact on our staff establishment. By managing these risks effectively, we are in a stronger position to offer better protection to our staff.

Legal (Including Equalities)

5.3 Identifying, managing and reducing any risk effectively mitigates against potential legal challenge.

6. Background Papers

Corporate Risk Management Strategy

Annex A

Qtr4 2022/23- Risk Summary Report Update

Risk Scoring Definitions

Inherent and Residual Risk Scoring

The Inherent Risk defines the risk score in a pre-control environment i.e. what the risk would look like (score) without any controls in place to manage the risk. The Residual Risk can be defined as the subsequent risk score as a consequence of applying controls to mitigate this risk.

Both inherent and residual risks are defined by two variables the Likelihood of the risk occurring and the Possible impact of that risk occurring. The higher the score allocated for the risk the higher the overall risk status. See matrix below:

Possible Impact or Magnitude of Risk					
	Catastrophic	4 *MEDIUM*	8 MEDIUM/HIGH	12 HIGH	16 VERY HIGH
	High	3 *MEDIUM/LOW*	6 *MEDIUM*	9 MEDIUM/HIGH	12 HIGH
	Medium	2 LOW	4 *MEDIUM*	6 *MEDIUM*	8 MEDIUM/HIGH
	Low	1 VERY LOW	2 LOW	3 *MEDIUM/LOW*	4 *MEDIUM*
Low 1-2 Low/Medium 3 Medium 4-6 Medium/High 8-10 High 12-16		**Very Unlikely**	**Possible**	**Probable**	**Almost Certain**
		Likelihood/Probability of Risk Occurring			

Effectiveness of Controls Score

Controls can be scored 0-4 in terms of their effectiveness at controlling risk in terms of likelihood and impact. Zero implies poor control of the risk whereas a four would suggest controls in place are highly effective. This is based on scoring how effective the controls are at reducing a) the likelihood of and b) the impact of the risk. See table below

Score	Effectiveness of control
0	Very Low control of the risk
1	Low control of the risk
2	Medium control of the risk
3	High control of the risk
4	Very high control of the risk

CORPORATE REGISTER SUMMARY

The table below provides a summary of the Corporate Risks broken down by their risk status in terms of their inherent (pre-control) risk score, the control risk score (how effectively the controls are managing the risk) and the residual risk score (post-control score). The table also gives an outline of each risk's direction travel, in terms of whether the risk is escalating or reducing as well as forecasting its future direction of travel.

Risk Ref	Risk	Inherent Risk Score	Effectiveness of Controls score	Residual Risk Score			Direction of Travel	Forecast Direction of Travel
				Likelihood	Impact	Total		
1	Financial Fragility	12 (H)	2 (M/L)	4	3	**12 (H)**	↔	↑
2	Legislative Change and Local Government Reform	12 (H)	2 (M/L)	2	3	**6 (M)**	↔	↓
3	School Reorganisation & Investment	12 (H)	2 (M/L)	3	2	**6 (M)**	↔	↔
4	Waste	12 (H)	2 (M/L)	4	2	**8 (M/H)**	↔	↔
5	Workforce Needs	12 (H)	1 (L)	4	3	**12 (H)**	↔	↑
6	Information Security	12 (H)	4 (M)	3	3	**9 (M/H)**	↑	↑
7	Project Zero	12 (H)	1 (L)	4	3	**12 (H)**	↑	↑
8	Cost of Living	12 (H)	1 (L)	4	3	**12 (H)**	↔	↔
9	Public Buildings Compliance	9 (M/H)	4 (M)	2	2	**4 (M)**	↔	↔
10	Safeguarding	9 (M/H)	4 (M)	2	2	**4 (M)**	↔	↔
11	Integrated Health and Social Care	9 (M/H)	4 (M)	3	2	**6 (M)**	↔	↓
12	Unauthorised Deprivation of Liberty Safeguards	9 (M/H)	6 (M)	1	3	**3 (M/L)**	↔	↔
13	Brexit	12 (H)	2 (M/L)	2	3	**6 (M)**	↓	↓
14	Additional Learning Needs	9 (M/H)	2 (M/L)	3	3	**9 (M/H)**	↔	↔
15	COVID-19	12 (H)	2 (M/L)	2	3	**6 (M)**	↔	↔
16	Market Fragility	12 (H)	1 (L)	4	3	**12 (H)**	↔	↑
17	Demand Management & Service Capacity	12 (H)	1 (L)	4	3	**12 (H)**	↔	↑

Risk overview

Six risks score high, three risks score medium/high, seven risks score medium, and one risk scored medium-low on the Register. During the fourth quarter of the year, there has been some movement in risk statuses in relation to Information Security, Brexit and Project Zero.

Direction of Travel

The majority of risks on the Register have maintained their static position during the period with the exception of CR6: Information Security, CR:7 Project Zero and CR13: Brexit.

Information Security (CR6)

- In April 2023 the NCSC (National Cyber Security Centre), a part of GCHQ, issued an alert to critical national infrastructure (CNI) organisations warning of an emerging threat from state-aligned groups. NCSC warned in the alert that some groups have stated an intent to launch 'destructive and disruptive attacks'. The threat comes particularly from state-aligned groups sympathetic to Russia's invasion of Ukraine, the alert said, and has emerged over the past 18 months.
- As part of an array of ongoing cyber resilience activities, the Vale of Glamorgan Council follows the NCSC threat guidance and avails itself of the NCSC core ACD (Active Cyber Defence) services, including Web Check, Mail Check, PDNS and Early Warning. Given the heightened cyber threat in the UK, the information security risk is revised upwards from the previous quarter, increasing from a score of Medium (6) to a score of Medium-High (9).

CR7 Project Zero

- The Project Zero risk has increased from a risk score of Medium (6) to a score of 12 giving it a high status. The status is reflective of the scale of both organisational and community change needed to reach our net zero goal by 2030. Further work is needed to maintain the momentum of the programme to ensure that we can deliver the Challenge Plan, given its vulnerability to the effects of the finanical fragility risk. At a time when our we are increasingly looking to make financial savings, this has the potential to impact on the viability of some of our ambitious programmes of work. Alongside ringfencing funding from reserves to support delivery of the Project Zero Programme, we are also considering potential sources of funding to ensure the Council is leveraging the funding needed alongside its revenue and capital budgets to deliver the Challenge Plan over the medium to long-term.
- The scale of the challenge to mitigate the carbon emnmissions generated through our suply chain is significant, and the data collected and reported to Welsh Government confirms this. Whilst we are inreseasingly looking to procure more locally, this will remain an area of ongoing challenge given that many of the third parties we contract with are small businesses that may lack the capacity and investment for carbon reduction.

CR13 Brexit

- The risks associated with Brexit still remain reflected in the score of (6) medium). This is reflective of current threat landscape with issues such as supply chain disruption, inflationary prices and staff shortages no longer been driven by Brexit alone and being fed by risks such as the cost of living, the war in Ukraine and the challenging economic and financial climate.

- The risk will continue to remain on the Register to ensure Senior Leadership Team, Cabinet and all Members have oversight of the risk and any future developments.

Forecast Direction of Travel

During the quarter 4 period, the forecast direction of travel statuses are as follows:

Risks forecast to diminish

- The DOT for the **legislative change and local government reform** risk is forecast to reduce. The primary focus of this risk was in the introduction of the Local Government & Elections Act and the majority of these provisions are now enacted, with this risk retaining a 'watching brief' on the way these become embedded. This risk will be reviewed on an on-going basis depending on what legislation the Welsh Government are seeking to introduce.
- The **Integrated Health and Social Care** risk is forecast to continue to maintain its downward trajectory as the focus continues to be on the development and implementation of a new 'Alliance Model.'
- **Brexit:** The direct impacts of Brexit are inextricably linked with the economic landscape in which the council is operating. It is forecast that this risk will continue to reduce in of itself, with residual issues relating directly to Brexit diminishing, whilst others – such as supply chain concerns – are being reflected in other risks on the corporate register, for example in financial fragility and market fragility (social care).

Risks forecast to escalate

- There are six risks on the Register that we forecast will increase over the year, these are: information security, financial fragility, workforce, market fragility, demand management and service capacity, and Project Zero.
- **Information security:** This risk continues to maintain its upward trajectory. Although the Council has invested in its cyber resilience, the threat landscape continues to evolve, so requires ongoing monitoring to review and assess what further mitigations may be required.
- **Financial fragility:** The DOT is increasing following the 2023/24 budget setting round. With inflation continuing to run at significant levels, pay awards being sought, increased complexity and demand within services and the uncertainty over the public finances. Following a significant period of austerity and the pandemic, the ability to balance the budget whilst making savings and not negatively impacting service delivery will be more challenging than ever. This will require more creativity and innovation, alongside difficult decisions.
- The **Workforce risk** is forecast to increase, as it is intrinsically linked to financial and market fragility and demand management issues across the Council and consequently one impacts upon the other. For example, the significant demand being seen across social care and the lack of social care capacity in communities is continuing to compound recruitment challenges of domiciliary care staff. The rising demand for social care services is putting our budgets under additional financial pressure, which in turn impacts on the financial fragility risk.

- The **Market fragility** risk remains managed, and no further providers have experienced serious difficulty in quarter 4, however, this area remains a high risk with potential to escalate due to ongoing rising prices and challenges in recruiting and retaining staff. The Council has advised providers of its proposed fee increases for 2023/24.
- **Demand Management & Service Capacity**: Demand levels in children's services remain challenging. There has been some improvement in quarter 4 with regards to the availability of domiciliary care however the situation remains challenging and waiting times in some cases are long.
- **Project Zero:** The Project Zero Programme Board recently reviewed this risk and there was a thorough review of the content of the corporate risk and in particular the effectiveness of controls. The Project Zero Challenge Plan has brought together and instigated a huge amount of activity across the organisation. The data collected and reported to Welsh Government is indicating the scale of the challenge to meet the net zero commitments with regards the supply chain where the majority of emissions are generated. This has resulted in the residual risk score being retained at a high level, representing the scale of work required.

Risks forecast to remain static

- **Cost of Living:** This risk relates to both the Council and the Vale of Glamorgan communities. The impact on high levels of inflation are recognised in this risk and also within the financial fragility risk, in recognition of the impact that price pressure is having on Council budgets. This has been well documented in the Council's revenue budget for the 2023/24 financial year. The Council recognises the impact of cost of living on the community and a significant amount of work is underway or been undertaken in the year, including providing payments via grant to residents, support for community groups to provide a 'warm welcome' and support for foodbanks. These efforts are making a difference to the community, however, their impact is limited within the context of significant pressure on residents' incomes. This risk has changed over the year, with initial concerns around energy price increases, social isolation issues over the winter and concerns around increasing interest rates. It is therefore forecast that this risk will retain its high risk status.
- **Covid-19:** The specific risks associated with the pandemic have diminished significantly over the last year. The Council retains responsibility for some direct covid related activity, for example in the provision of PPE. However, the risks associated with covid previously considered within this corporate risk are, like Brexit, now presenting in other areas – notably the economic landscape and therefore is reflected within the financial fragility risk on the register.
- **Unauthorised Deprivation of Liberty Safeguards (DoLS):** The medium-low risk status ((risk score of 3) attributed is reflective of a managed risk. However, adhering to DoLS continues to place pressure on Social Services in terms of officer workload/capacity and budgets.
- **Additional Learning Needs (ALN):** The risk retains a medium-high status reflective of the challenges faced in implementing the new duties associated with the Act, in particular, developing sufficient provision to meet demand in growth areas. These relate to children and young people with complex autism, physical and medical difficulties and those experiencing social and emotional health difficulties. This presents an ongoing challenge.
- **Public Building Compliance:** A risk status of medium (risk score of 4) remains in relation to our arrangements for the management of compliance and compliance data for our corporate building stock. Regular compliance updates considered by the Strategic Insight Board, Strategic Leadership Team and Schools Operational Investment Board, ensuring appropriate mitigations are in place.
- The **Waste** risk retains a medium-high status (risk score of 8) which reflects the challenges associated with the roll out of the waste blueprint.

- **School Reorganisation and Investment:** this risk retains a medium status (risk score of 6). The economic uncertainty, Brexit, the ongoing war in Ukraine continue to present challenges that is impacting our ability to deliver some aspects of the Sustainable Communities for Learning Investment Programme.