Risk Management Cabinet Member for Finance & Commissioning 1 February 2024 Date: Agenda Item: 7 Contact Officer: **Andrew Wood** Tel Number: 01543 308030 Audit Email: andrew.wood@lichfielddc.gov.uk **Committee Key Decision?** No

1. Executive Summary

Full Council

1.1 To provide the Committee with their routine risk management update.

2. Recommendations

2.1 That Members note the risk management update and receive assurance on actions taking place to manage the Council's most significant risks.

Background

Local Ward

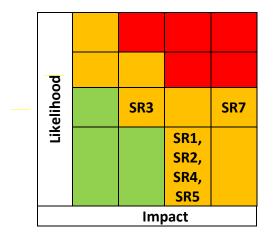
Members

- 3.1 The purpose of risk management is to effectively manage potential opportunities and threats to the Council achieving its objectives. The Risk Management Policy was reviewed at this committee's meeting in 28th November 2023. Part of the Audit & Member Standards Committee's terms of reference is 'to monitor the effectiveness of the Council's risk management arrangements, including the actions taken to manage risks and to receive regular reports on risk management'. This report supports the Committee in achieving this objective.
- 3.2 The Council operates a 'three lines of defence' model in terms of risk management, this allows for a consistency of approach when designing our risk framework and controls. The model is set up in the following format;
 - The first line of defence (functions that own and manage risks) is formed by managers and staff who
 are responsible for identifying and managing risks as part of their accountability for achieving
 objectives.
 - The second line of defence (functions that oversee or who specialise in compliance of the management of risk) provides, policies, frameworks, tools, techniques and support to enable risk and compliance to be managed in the first line. This is conducted by monitoring to judge how effectively they are doing it, and helps ensure consistency of definitions and measurement of risk.
 - The third line of defence (functions that provide independent assurance) is provided by internal audit. Internal Audit's main role is to ensure that the first two lines of defence are operating effectively and advise how they can improve.
- 3.3 The strategic risk register is produced by assessing the risk factors that could potentially impact on the Council's ability to deliver its strategic plan. This assessment ensures that there are the right measures in place to control the potential risks to our business objectives. Risks are assessed based on their likelihood of occurrence and their potential impact. Each of these are rated on a scale of 1 (Low), 2 (Medium), 3 (Significant) and 4 (High). By multiplying the two scores together, each risk receives a score.

- 3.4 The Strategic Risk Register was considered by Leadership Team on 24th January 2024 and subsequently reported to this committee and is detailed at **Appendix 1.** Following LT it was agreed that the Audit Manager Shared Services would consider updates to the risk register, together with the 'horizon scanned' risks, since the November report the following updates in summary have occurred;
 - **SR1** inclusion of provisional settlement for 2024/25 and subsequent outcome of settlement in February 2024. Inclusion of Planning Appeal costs without a current Local Plan.
 - **SR2** reference made to Staffordshire Resilience Forum. Update to wording of 2nd line of defence to include 'quarterly' reporting to LT.
 - **SR3** inclusion of wording in respect of utilisation of the LATCo to provide greater resilience and flexibility in respect of resourcing.
 - **SR4** GDPR follow up audit with substantial assurance.
 - **SR5** reference made to new Strategic Plan May 2024. Mitigating control added in respect of Car Parking Strategy to encourage the viability of the City Centre.
 - **SR7** Resilience provided by the move from copper to fibre (anti-surge/back up and servers). Inclusion of an action relating to Draft IT Strategy for development February 2024
 - **Horizon Scanned risks** additional wording in respect of organisational commitments which are highlighted in yellow in **Appendix 1**.
 - **Elections capacity** relating to lack of dedicated Elections Team.
 - **GDPR** risks were identified in respect of this area in respect of 'Limited Assurance' review. Internal Audit have followed up on this review and will be reporting to management at the conclusion of the review. This has now been assessed as being 'Substantial Assurance'. However, GDPR and potential data breaches are an ongoing risk which management needs to ensure is addressed.
 - Climate Change this continues to be a high profile area of risk in respect of addressing the public and political aspirations in this area. Internal Audit previously reviewed Climate Change and ongoing work is required to ensure implementation of recommendations.
 - Local/Strategic Plan costing of planning challenges and appeals with associated budget pressures.
 - Impact of Section 114 notices in the locality of Lichfield in terms of service demands and risks to the services provided e.g., Payroll and Car Parking.
 - Charging for Food Waste continuing review and update for potential costs for the disposal of food waste.
 - **DWP Searchlight** changes in Memorandum of Understanding from DWP which is currently being challenged as previously the implication was that now non-compliant activity was allowed previously.

All changes have been highlighted on the Strategic Risk Register at Appendix 1.

3.5 The Council's 6 strategic risks (SR6 was approved for removal by the Committee) as at September 2023 the risk profile of strategic risks of the Council is shown below. It is noted that the scoring and review of each strategic risk is continuing, however no changes in the risk profile were made between September and December 2023:



The overall aim to reduce the current scores by the use of mitigating control and robust management processes, progress has been made since the last Audit & Member Standards Committee meeting and strategic risks will continue to be reported quarterly.

- **SR1:** Pressures on the availability of finance may mean the Council is not able to deliver the key priorities of the strategic plan.
- **SR2:** Resilience of teams to effectively respond to a further serious disruption to services.
- **SR3**: Capacity and capability to deliver / adapt the new strategic plan to emerging landscape.
- **SR4:** Failure to meet governance and / or statutory obligations e.g. breach of the law.
- SR5: Failure to adequately respond to the wider socio-economic environment over which the Council may have little control, but which may impact on the growth and prosperity of the local area.
- SR7: Threat to the Council's ICT systems of a cyber-attack.
- 3.6 Work to review of the effectiveness of our sub strategic (service / operational) and project risk has now been completed. In summary:
 - The 3 lines of assurance approach (as used in the Strategic Risk Register) has now been adopted for sub-strategic risks (i.e. service level risks).
 - Quarterly update meetings have been scheduled with Leadership Team and Audit Manager (Shared Service).
 - There is no longer a requirement to record and manage risks below service level (services or teams are, however, at liberty to do so if it meets their business requirement).
 - Project risks continue to be managed in accordance with accepted project methodology (i.e. PRINCE2).
 - At this stage, no sub strategic risks need to be escalated to the strategic risk register

Alternative Options	There are no alternative options.
Consultation	Leadership Team receive monthly updates on Strategic Risk Register

Financial Implications	Risk management processes consider value for money at all times of the process. Failure to manage risks could lead to the Council being faced with costs that could impact on its ability to achieve its objectives.
Approved by Section 151 Officer	Approved.
Legal Implications	None identified.
Approved by Monitoring Officer	Approved.
Contribution to the Delivery of the Strategic Plan	Sound risk management ensures that risks affecting the delivery of the strategic plan are identified and managed.
Equality, Diversity and Human Rights Implications	Sound risk management ensuring a consistent and robust approach all equality, diversity and human rights issues and their implications to the Council.
EIA logged by Equalities	EIA logged by Equalities
Crime & Safety Issues	None.
Data Assessment	None.
Environmental Impact (including Climate Change and Biodiversity).	Risk arising from climate change and the green agenda are considered by management and Leadership Team.
GDPR/Privacy Impact Assessment	Risks associated with non-compliance with GDPR are included within SR4: Failure to meet governance and / or statutory obligations e.g., breach of law (e.g., Health & Safety, GDPR, procurement, Safeguarding).

	Risk Description & Risk Owner	Original Score (RYG)	How We Manage It	Current Score (RYG)
Α	Failure to manage known risks and opportunities proactively. Leadership Team	Likelihood: Green Impact: Red Severity: Red	Strategic risks are closely monitored by the Audit & Member Standards Committee, Cabinet Member and Leadership Team. Reports to Audit & Member Standards Committee provide assurance that active steps are being taken to control risks.	Likelihood: Green Impact: Yellow Severity: Green

Background documents	Risk Management Policy – updated and approved by Audit & Member Standards Committee 20 July 2023.
Relevant web links	



Strategic	Risk & Owner	Original	Mitigating Controls	Current	Target	Actions	3 Lines of Assurance
Plan Link		Score		Score	Score	Responsibility / Timescale	
A good	SR1 Pressures on the	16	Prudent estimates for	3	3	Update of the Medium	1 st Line:
council,	availability of finance may	(L4xI4)	Business Rates and New	(L3xI1)	(L3xl1)	Term Financial	Approved Medium Term
developing	mean the Council is not able		Homes Bonus based on			Strategy	Financial Strategy including
prosperity,	to deliver the key priorities		modelling provided by			Responsibility:	the Capital Strategy covering 5
shaping	of the strategic plan.		Local Government			Assistant Director	years plus a 25 year capital
place,	The risk is influenced by:		Finance experts.			Finance &	investment model.
enabling	 Government spending 		 Risk assessed minimum 			Commissioning will	A longer term financial plan
people	plans.		level of reserves set at			commence in July	covering a 25 year horizon for
	 The national and local 		£1.9m.			2023 and approved	revenue budgets.
	economic climate, C Tax		 Routine budget 			February 2024	Approved Treasury
	referendum limit, grant		monitoring reported to				Management Strategy.
	funding implications,		Leadership Team, Cabinet			 Outcome of Final 	Production of monthly budget
	changes to business		and Overview and			Local Government	reports to Managers.
	rates and social housing		Scrutiny Committee.			Financial Settlement –	Procurement Strategy
	rents.		 Requirements of the new 			<mark>single year in</mark>	2 nd Line:
	Local Government		CIPFA Financial			February 2024.	Leadership team review of 3,
	Finance Reform		Management Code,				6, 8 and 12 month reports to
	including New Homes		information contained in				Cabinet and Overview and
	Bonus, Business Rates		the CIPFA Resilience				Scrutiny Committee.
	and the Fair Funding		Index and benchmarking				Mid-year and outturn
	Review.		reports from LG Futures.				Treasury Management reports
	Other Government		 Confirmation and 				to Audit and Member
	Policy announcements		Implementation of				Standards Committee.
	impacting on Local		financial settlement for				Initial assessment of LDC's
	Government.		2023/24 and Provisional				level of compliance with the
	Funding of Council's		Settlement for 2024/25.				FM Code to Audit and
	headline priorities and		Balanced budget for next				Member Standards
	the shortfall of funding.		2 years.				Committee 12/11/2020.



Strategic Plan Link	Risk & Owner	Original Score	Mitigating Controls	Current Score	Target Score	Actions Responsibility / Timescale	3 Lines of Assurance
	 Inflationary pressures on procurement of services, cost of living/fuel/construction and replacement fleet 						CIPFA Resilience Index with comparative information to nearest statistical neighbours and all District Councils.
	vehicles.						3 rd Line:
	 Reduced Planning income and the costs of potential Planning Appeals. 						 External Audit – going concern test and sign off of financial statements 2021/22. Unqualified VFM assessment. Internal Audits of Accountancy and Budgetary
	Owner: Assistant Director - Finance & Commissioning (Section 151)						Control 2018/19 -substantial assurance, Capital Strategy 2020/21 – reasonable assurance, Capital Accounting 2020/21 – substantial
							assurance, Income Management 20/21 – reasonable assurance, Procurement 22/23
							substantial assurance
							LGA Corporate Peer Challenge
							 Draft External Audit Annual Audit Report for 2021/22 and 2022/23



	Risk & Owner		Mitigating Controls	Current	Target	Actions	3 Lines of Assurance
Plan Link		Score		Score	Score		
Strategic Plan Link A good council, developing prosperity, shaping place, enabling people	Risk & Owner SR2 Resilience of teams to effectively respond to a further serious disruption to services (e.g. multiple layer disruption arising from flooding and other disruptive events). New people into organisation. Potential for power disruptions. Affects to service delivery and office systems. New SRF with added commitment/required capacity.	Original Score 12 (L3xl4)	 Mitigating Controls Mutual aid assistance Local Resilience Forum (LRF). Tested business continuity arrangements in place including office power generation. Strong links with the Staffordshire CCU, Risk Action Working Group and wider LRF. Active workshop on BCP to LT. Actively engaged in ongoing Local Resilience Forum response and recovery work streams. Strategic and tactical flood planning work across LRF, to assist in our response and the multi-agency response to 	Current Score 3 (L1xl3)	Target Score 3 (L1xi3)	Actions Responsibility / Timescale Tasks completing and move away from initial Pandemic response, move to Being a Better Council.	1st Line: Day to day business continuity plans in place. Regular BCP testing (generator) Training programme. 2nd Line: Quarterly Report to Leadership Team. CCU test of arrangements feedback. Response and learning from recent incident at Ridware House. Report on recovery plan Overview & Scrutiny (O&S). Approval of Climate Change Strategy. 3rd Line: Internal Audit of business continuity 2019/20 —
	Owner: Leadership Team		such events. This includes identifying 'at risk' areas in the District and specific actions required.				reasonable assurance, ICT – remote working 20/21 – reasonable assurance.
			actions required.				 Flash Covid-19 Risk Assurance Business Continuity, Emergency Planning and



Strategic	Risk & Owner	Original	Mitigating Controls	Current	Target	Actions	3 Lines of Assurance
_	Misk & Owner	_			_		3 Lines of Assurance
Plan Link		Score	 Provision of Foodbank presence, Warm Spaces etc. Business Continuity planning. New SRF 	Score	Score	Responsibility / Timescale	Recovery 20/21 substantial assurance 3 rd Line: Internal Audits of Accountancy and Budgetary Control 2018/19 -substantial assurance, Capital Strategy 2020/21 – reasonable assurance, Capital Accounting 2020/21 – substantial assurance, Income Management 20/21 – reasonable assurance, Procurement 22/23 substantial assurance
							 External Audit – going concern test and sign off of financial statements 2020/21. Unqualified VFM assessment.
A good	SR3: Capacity and capability	6	Regular review of	4	4	Implementation of	1 st Line:
council,	to deliver / adapt the new	(L2xI3)	progress against delivery	(L2xI2)	(L2xI2)	Being a Better	Day to day business / service
developing	strategic plan to emerging		plan outcomes and			Council.	planning, financial planning
prosperity,	landscape.		prioritisation process			 Management 	and performance
shaping			agreed between			oversight and robust	management.
place,	Senior Leadership Team		Leadership Team and			project management	Completion of OKRs.
	changes.		Cabinet.			requirements for	2 nd Line:



Strategic	Risk & Owner	Original	Mitigating Controls	Current	Target	Actions	3 Lines of Assurance
Plan Link		Score		Score	Score	Responsibility / Timescale	
enabling people	Strategic level roles and active recruitment. Owner: Leadership Team		 Robust project management. Communications to all staff. Recruitment activity. OKR completion leading to identifying training and development needs. Monitoring resource demands. Mental health / wellbeing systems in place. Upcoming Community Power Strategy to increase capacity to deliver. New Strategic Plan to 2050. Utilisation of LATCo to provide greater resilience and flexibility for resourcing. 			delivery of Better Council.	 Delivery Plan reported 6 monthly to Cabinet and shared with Overview & Scrutiny. Quarterly updates to LT on Belonging and Wellbeing Strategy. 3rd Line: Internal Audits of People Strategy and Workforce Development 2019/20 – reasonable assurance, Performance Management 19/20 – substantial assurance. Inclusion in Audit Plan for reviews against delivery of themes. LGA Corporate Peer Challenge follow up
A good	SR4: Failure to meet	9	Regularly reviewed	3	3		1 st Line:
council	governance and / or	(L3xI3)	constitution, policies and	(L1xI3)	(L1xl3)		Day to day processes and
	statutory obligations e.g.		procedures.				Local Code of Governance



Strategic	Risk & Owner	Original	Mitigating Controls	Current	Target	Actions	3 Lines of Assurance
Plan Link		Score		Score	Score	Responsibility / Timescale	
Plan Link	breach of the law (e.g. Health & Safety, GDPR, procurement, Safeguarding), lack of openness / transparency in decision making, breach of the constitution. This could lead to fines as well as reputational damage. Subsidy Control Framework and self-assessment risks subject to challenge. Arrangements in process of being developed, requirement to build in operation and awareness training. Risk of failure to retain documentation in a manner to allow both storage and retrieval. Owner: Chief Operating Officer	Score	 Training and awareness for all staff and members. Effective Overview and Scrutiny and Audit & Member Standards Committee oversight. Codes of Conduct. Internal audit. Dedicated Monitoring Officer Roles of Section 151 Officer and Monitoring Officer. Shared legal services. Procurement Team. Governance Team with additional capacity being recruited. Internal Appointed DPO. Review of document storage and filing systems. Electronic retention of documentation. Sealed documents held in fire proof room. Education and 	Score	Score	Responsibility / Timescale	 Forward plans/committee work plans/ delivery plan and service planning. Use of Mod Gov and publication scheme. 2nd Line: Annual reports to Audit and Member Standards Committee. Regular reports to leadership team. Transparency data publication. Completed review of document storage. Procurement Team in place and operating. Internal DPO in place 3rd Line: RIPA, ICO and Ombudsman reports/returns. External audit of Annual Governance Statement as part of the financial statements. 2019/20 – adequate assurance, GDPR follow up 2019/20 & 2022/23 – limited
			development of Service				assurance and follow up



	Risk & Owner		Mitigation Controls	Comment	Toward	Actions	3 Lines of Assurance
Strategic	RISK & Owner	Original	Mitigating Controls	Current	Target		3 Lines of Assurance
Plan Link		Score		Score	Score	Responsibility / Timescale	
			Managers to support				during 23/24 – substantial
			teams with advice and				assurance, Transparency code
			guidance.				follow up Procurement 20/21
			•				limited assurance – follow up.
							Review of GDPR and agreed
							action place reported to
							A&MS Committee for
							2022/23 and 2023/24.
							 External investigations and
							lessons learnt exercises to
							address internal control
							weaknesses.
A good	SR5: Failure to adequately	9	 Financial assistance from 	3	3	 Continued delivery of 	1 st Line:
council,	respond to the wider socio-	(L3xl3)	Government to	(L1xI3)	(L1xl3)	immediate actions to	Day to day delivery of
developing	economic environment over		businesses and the public.			support high street	economic development,
prosperity,	which the Council may have		 Prosperity is a key theme 			economy and business	housing and health and
shaping	little control, but which may		in the new Strategic Plan.			(including visitor	wellbeing strategies.
place,	impact on the growth and		 Staffordshire Leaders 			economy and	Development and inclusion of
	prosperity of the local area.		Board			hospitality sector).	Being a Better Council
			 Staffordshire Chief 			 Further government 	2 nd Line:
	Relating specifically to the		Executives Group			support – the	 Leadership team review of 3,
	effects of the 'cost of living		 Strong partnership 			Welcome back Fund -	6, 8 and 12 month Money
	crisis. This results in an		working e.g. Lichfield			received to extend	Matters reports to Cabinet,
	increase in unemployment,		District Board, Staffs CC,			timescales and assist	Strategic (OS) Committee.
	business closures coupled		Birmingham Chambers.			with the reopening of	Health and Wellbeing Strategy
	with emergence of higher					high streets and	delivery reports.



	Risk & Owner		Mitigating Controls	Current	Torget	Actions	3 Lines of Assurance
Strategic	RISK & Owner	Original	Mitigating Controls	Current	Target		3 Lines of Assurance
Plan Link		Score		Score	Score	Responsibility / Timescale	
	expectation of ongoing		Burntwood Business			support to local	3 rd Line:
	support from the Council.		Community LGA, DCN,			businesses through to	 Internal Audit of Economic
	Increased demand on		 New burdens funding. 			March 2022.	Development Partnership
	Council services such as		 Partnership influences 			Additional spend on a	Arrangements 2017/18 –
	benefits via increased		built into business case			variety of projects	adequate assurance, Tourism
	Universal Credit claims, at		considerations.			currently in process of	2019/20 – reasonable
	the same time that Council		 Continue to develop and 			being identified.	assurance, Housing Benefits –
	suffering reduced income.		improve the business			 Implementation of 	overpayments 2017/18 –
			contact and relationships			Being a Better Council	adequate assurance, Housing
	Including Ukraine families		locally.			– Better Led, Better	Benefits – verification and
	and Refugee dispersal within		 Development of 			Equipped and Better	performance 2016/17 –
	area.		Wellbeing indicators at			Performing.	substantial assurance,
			ward level for both				Housing Benefits and Council
	New Strategic Plan from		activity and response.				Tax Relief 20/21 substantial
	May 2024.		Cost of living issues				assurance
			mitigated and off set by				
	Owner: Leadership Team		Tourism.				
	·		 Ongoing Council Plans 				
			development.				
			Car Parking Strategy to				
			encourage viability of City				
			<mark>Centre.</mark>				



Strategic	Risk & Owner	Original	Mitigating Controls	Current	Target	Actions	3 Lines of Assurance
Plan Link	Nisk & Owner	Score		Score	Score	Responsibility / Timescale	3 Ellies of Assarance
A good council	SR7: Threat to the Council's ICT systems of a cyberattack following dramatic increase in remote working which if successful could result in loss of data / loss of access to applications — which may incur fines / reputational damage. Involvement of state players and their use of cyber warfare as part of a strategy to further agendas. Increased number of	4 (L1xl4)	 Use of firewalls and virus protection to manage cyber security, including penetration testing. Strong access level controls (including remote access). Training and regular awareness raising to staff of risks. Digital strategy. PSN compliance checklist. Revision of Service Business Continuity Plans. IT Auditor provision resourced from August 	8 (L2xI4)	4 (L1xI4)	 Review mandatory training requirements. Reminder to staff to complete training and awareness. Re-run Awareness Training/Meta Compliance Completion of PSN Compliance checklist Draft IT Strategy (Feb 2024) 	 1st Line: Day to day operation of ICT Training programme for all staff. Up to date versions of software and implement all IT security patches. Awareness Training/Meta Compliance. Maintenance of PSN Compliance.
	sophisticated 'phishing' attacks with increased time taken to investigate and remediate. Move away from purely email to other platforms such as 'Teams'.		 Adoption of multi-factor authentication. Development of monthly reports from software supplier for follow up of 				 2nd Line: Regular monitoring and reporting on security issues to Leadership Team. External penetration testing. Full Council wide adoption of multi-factor authentication.



Strategic	Risk & Owner	Original	Mitigating Controls	Current	Target	Actions	3 Lines of Assurance
Plan Link		Score		Score	Score	Responsibility / Timescale	
	Failure by staff to complete ICT training and the take up of MFA. Move from copper to fibre (anti-surge/back up and servers). Owner: Chief Executive		staff not completing mandatory ICT training. • Implementation of Knowledge Hub training.				 3rd Line: ICT Audit Procurement to review risk environment. ICT Audit Needs Assessment completed. Review of Microsoft 365 2021/22 IT Remote Access 2021/22 IT Website 2021/22. Increase in the amount of IT Audit days from 20 to 40 for 2022/23. PCI DSS 2023/24



Key to 3 lines of assurance:				
1 st Line	Day to day operations of internal control systems			
2 nd Line	Management oversight and monitoring controls			
3 rd Line	Independent assurance from Internal / external audit and			
	other independent assurance sources (e.g. HSE, BFI)			

Other Horizon Scanning Risks Arising August 2023:

Impact on the organisation arising from the devolution / local recovery white paper which was due in September 2020 and has now been postponed to 2021. Not a strategic risk at present, to include as a horizon scan until more information is known and impact on operations can properly be assessed.

Impact on Council activities via the Government's legislative timeframes and planning activities arising from the Planning Bill detailed in the Queen's Speech.

Elections capacity with no dedicated Elections Team.

To balance the delivery of service specific objectives against the priorities and demands from Members/Cabinet to ensure continued alignment with Strategic Plan.

Impact of withdrawal of government support measures (furlough), Universal Credit and implications for businesses and residents.

pEPR implications around systems for recycling packaging and compensatory affects.

Implications of increase in fuel duties from 1 April 2023

Planning application fees – self funding.

LATCo review of governance arrangements and structures.

Arrangements for legislative changes following Brexit and blanket withdrawal in December 2023.

Insourcing of outsourced arrangements both cost and reputationally to the Council

GDPR

Climate Change

Local Plan/Strategic Plan costing of Planning challenges and cost of appeals with associated budget pressures

Impact of Section 114 notices in the locality of the Council in terms of service demands and risks to services provide e.g., Payroll and Car Parking

Charging for Food Waste

Updates to DWP Searchlight – Memorandum of Understanding nationally to which Council's are unable to comply relating to previously accepted practices.



Appendix 1: Strategic Risk Register – January 2024 Strategic Risk Register – removed risks

	ponsibility / Timescale IT Strategy and 1st Line:	
A good SR6: Failure to innovate and 9 • Refurbishment and 4 1 • IT	IT Strategy and 1 st Line :	
	 ICT hardware replacement programme providing the right equipment for mobe and flexible working. Ongoing monitoring of customer (internal and external) feedback. 2nd Line: Monitoring of Lichfield Connects contact levels, trends and reporting on complaints and compliment to Leadership Team. 3rd Line: Local Government Ombudsman. Flash Covid-19 Risk Assur Staff Wellbeing 20/21 substantial assurance Flash Covid-19 Risk Assur Productivity and Governat 21/22 substantial assurance 	ents rance rance