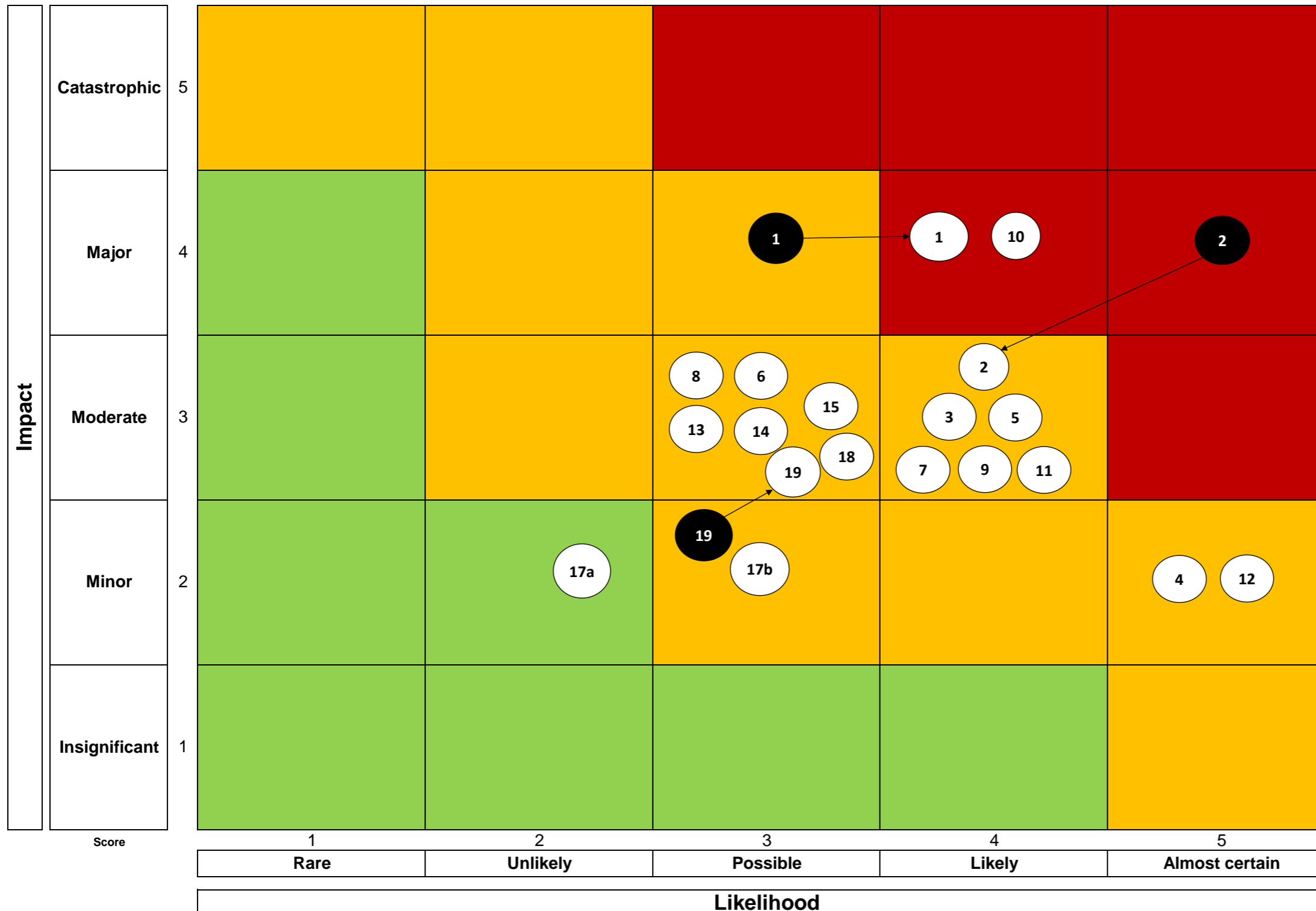
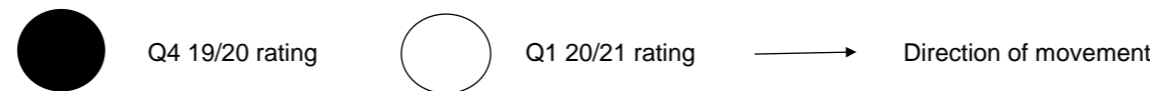


CORPORATE RISK REGISTER
Q1 June 2020



- Risks**
1. Failure to deliver a balanced budget.
 2. Insufficient clarity around Member and Officer roles.
 3. Inadequate succession planning and staff retention.
 4. Inability to meet and manage the demands of homelessness.
 5. Failure to manager or failure to deliver or expose new risks as a result of poor project management practice.
 6. Legal obligations under GDPR are breached.
 7. Plans for improving the economic prosperity and regeneration of Northampton are not delivered.
 8. NBC fails to manage its partnerships (LGSS, NPH, NLT).
 9. Major or large scale incident causes business interruption.
 10. Impropriety or improper business activities leading to fraud or malpractice.
 11. Decisions made at Council or Cabinet level are not robust to withstand legal challenge..
 12. Inability og IT to service future requirements due to cyber attack.
 13. Non-compliance with Fire and Health & Safety legislation.
 14. Safeguarding arrangements are not adequate to protect vulnerable adults and children.
 15. Failure to deliver enough new housing.
 16. REMOVED: LGR risk - To be included in LGR project risk register.
 - 17a. Impact of Brexit on NBC services.
 - 17b. Impact of Brexit on Northampton economy.
 18. NEW RISK: Climate change.
 19. NEW RISK: Loss of LGSS services



CORPORATE RISK REGISTER
Q1 June 2020

No	Risk Description	Risk Causes	Risk Consequences	Inherent Risk Rating	Key Measures in Place to Manage The Risk (Key Controls)	Current Risk Rating		Further Action & Implementation Date	Target Risk Rating	Risk Owner	Update & date
						Q4 19/20	Q1 20/21				
1	Failure to deliver a balanced budget 20/21 – 23/24	<ul style="list-style-type: none"> • Council unable to deliver sufficient savings to balance budget • Major projects don't deliver planned benefits • Complacency in the organisation • Increased organisational change and complexity • Changes in govt. funding particularly NNDR and NHB including late Government Financial Settlement due to change in Prime minister/Cabinet • Complex challenges of addressing both the controllable and uncontrollable pressures and events that can act on both income and expenditure • Challenges of working with partnership or arms- length organisations where there is a loss of direct management control . Covid19 - income loss and uncontrollable costs 	<ul style="list-style-type: none"> • Inability to set a legal budget • Depleted Reserves • Need to realise capital receipts • Inability to deliver services to meet customer need/demand and expectations of the Council - Budget overspend not containable within normal reserves 	16	<ul style="list-style-type: none"> • Review reserves strategically • Robust monitoring of budgets by services and taking early remedial action where issues identified. • Management Board action to limit spending where appropriate and communicate to staff on spending restrictions • Bi-monthly financial reporting to Cabinet • Monthly financial reporting to the Management Board • Finance Away Days for Boards and HoS • Bi-monthly meetings between LGSS Contract Managers and the S151 officer. Improved management reporting and KPI's. • Cabinet/CMB awayday held 3rd October and 7th November 2019. • Draft balanced budget to Cabinet 23/12/19 • Public consultation to 31/1/20 - CMB monitoring budgets monthly and updating Cabinet on Covid specific risks 	12	16	<ul style="list-style-type: none"> • Change in Government funding restricts District & Borough council tax increase to 1.99%, previously increase limit was 2.99% - Actively pursuing all Government Grant opportunities - Considering what costs can be reduced from normal services and what options may go forward to Cabinet to consider 	4	CFO (S151)	Updated June 2020

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2	<p>Projects may be instigated outside normal process where there is a lack of clarity around Member and Officer roles.</p> <p>Reputational damage may occur should promises to the public by Members not be realised.</p>	<ul style="list-style-type: none"> Members and Senior Officers roles (formulating and administrating policy respectively) are not always clear The culture does not resonantly promote a separation of the respective roles and duties of members and officers Officers feel inhibited in giving full, objective, professional and technical advice to Members in charged political atmospheres Officers in their role seek to frustrate the strategic choices, policy and direction-setting of Members Weak management of Members by leadership in the past 	<ul style="list-style-type: none"> Significant decision-making with significant outcomes and impacts is not robust and is not properly administered or processed by the organisation The intended outcomes and objectives of decisions are not achieved or are achieved in sub-optimal terms Maladministration occurs The control environment is weakened and controls could be bypassed Potential for reputational damage and loss of public and stakeholder confidence Regulatory criticism Legal challenge may be made and increased costs incurred 	20	<ul style="list-style-type: none"> Council Constitution (incl. the Member-Officer Protocol) Cabinet reporting system Scheme of Delegation Contract Procedure Rules EPB set up to aid interface between Members and Officers. Weekly meeting with CMB and Cabinet to discuss general updates and any potential issues/gaps in information communicated. Review of EPB terms of reference (Sept 2018) Independent review by BDO as the internal auditors. Political skills training took place 17th October. 	20	12	<ul style="list-style-type: none"> Implementation of Member-Officer Protocol audit recommendations following BDO review (by Mar 20) Provision of training on Member-Officer Protocol (by April 20) Corporate training to Officers plus briefings to all staff to reiterate the standards to be enforced (by April 20) Member protocol agreed by standards committee and member officer working group, last meeting 29th June 2020. Agreed to obtain member approval at Full Council on 20th July 2020. 	12	Borough Secretary	Updated June 2020

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3	Inadequate succession planning, capacity and retention leading to service disruptions/non delivery	<ul style="list-style-type: none"> Salaries not competitive with LAs outside the local catchment area Reputation of the Council is not positive Perception of organisational instability Continual cost cutting Drift in staff morale Differing levels of engagement within the organisation Historic failure and disconnect of leadership to engage with staff Impact of unitary causing uncertainty Lack of HR strategic profile in the organisation Extension to Unitary launch 2020 to 2021 	<ul style="list-style-type: none"> Inability to recruit to roles (particularly key roles) Inability to retain staff (particularly key talent staff) Depressed staff morale Increased staffing costs due to agency/interim costs Staff leaving (particularly key staff) take their organisational knowledge out of the organisation when they leave No succession planning is possible particularly around specialist and qualified posts Reduced organisational effectiveness and performance Lack of organisational resilience 	20	<ul style="list-style-type: none"> Recruitment process changed eg. to advertise more widely, use of dynamic job ads and increase use of specialised agencies to find permanent staff or fixed term applicants Benefit of council pension scheme headlined to attract staff Performance appraisal rewards highly effective staff Family friendly policies, eg maternity and paternity leave Generous holiday allowance Subsidised car-parking Guildhall location Flexible working hours Inflation pay rises provided Further CMB/Cabinet review Jan/Feb 2020 - priorities and implication of unitary 	12	12	<ul style="list-style-type: none"> Review of staff Terms and Conditions (ongoing) Review of performance appraisal process (ongoing) A number of initiatives in wellbeing and communication being considered for deployment (On-going) Roll-out of Leadership Development Programme (On-going) Promote unitary as an opportunity for development CMB is considering all options to reduce the risk and any impact, CMB is being informed by views from MTUCM Uncertainty around Unitary may increase risk. Regular reporting on use of interims and spend to CMB CMB through OD & HR identifying risks and mitigations Learning and Development strategy including succession planning in draft, due to be finalised Spring 2020 	9	CFO (S151)	Reviewed June 2020
4	Inability to meet and manage the demands of homelessness in the Borough	<ul style="list-style-type: none"> Significant increases in the numbers of people who are homeless Significant increases in the number of people in temporary accommodation (TA) Welfare reform, eg. extension of the benefit cap reducing affordability of housing Households loss of private rented accommodation Difficulty in accessing private rented accommodation Shortage of social rented housing Homelessness Reduction Act increasing use of TA 	<ul style="list-style-type: none"> Increased demand leads to significantly greater costs for the Council Follow-on significant budgetary overspend occurs Pressure of financial impact of overspend of c£1.5m More homelessness applications Increased statutory duty to rehouse Increases of numbers of people in BB and TA accommodation 	16	<ul style="list-style-type: none"> Rigorous budget monitoring in place Regular financial reporting to Management Board, Portfolio-Holder & Cabinet Budget increases 19/20 for service provision and improved staffing levels. 3/4/19 - Cabinet approved a 14 point action plan for reducing the use and cost of TA Further mitigate cost <ul style="list-style-type: none"> Strategy for procuring cheap accommodation Slow demand Fortnightly meetings of multi-disciplinary TA Action Plan Implementation Group Restructure of Housing & options team Consultation completed August 2019. Restructure focussed on increasing management capacity, homelessness prevention and more effective management of homelessness and TA Recruitment of additional posts completed 	10	10	<p>The acquisition of Beaumont House and Riverside House are now complete and work will soon be underway to convert these two redundant office blocks into a total of 120 apartments.</p> <p>Requested Cabinet to authorise the purchase of 130 homes and six houses in multiple occupation, through the Housing Revenue Account, in order to reduce the use and cost of temporary accommodation and increase the supply of supported housing available to people who are sleeping rough.</p> <p>More use of private sector properties through Social Lettings Agency's-Leasing Scheme.</p>	10	Head of Housing	Updated July 2020

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						Q4 19/20	Q1 20/21				
5	<p>Failure to manage, deliver or expose new risks as result of poor project management practice.</p> <p>Reputational damage possible.</p>	<ul style="list-style-type: none"> Lack of a clearly-defined project management governance structure Lack of written procedures and related compliance as a source of assurance Inadequate checks and balances Inadequate project documentation maintained - business cases in particular 	<ul style="list-style-type: none"> Wrong decisions made on an unviable business case Continual review of projects – stopping unviable projects Reputation Financial costs Pressure on resources Pay back on investment funds if not delivering 	16	<ul style="list-style-type: none"> Gateway reviews conducted and reported to CMB for approval More robust governance processes (as per above risk on governance) Completion of Project Management Framework document Highlight reports reported monthly to CMB Project Managers are made accountable for reporting issues and risks to the Head of Economy, Assets and Culture Review of project management documentation to simplify and make it easier for reporting purposes (April 2019). 	12	12	<ul style="list-style-type: none"> Continue to develop and install more robust governance processes (Ongoing) 	4	Economic Growth & Regeneration Manager	Reviewed June 2020
6	<p>Legal obligations under the Data Protection Act 1998 (and also the superseding GDPR EU Regulations in 2018) are breached and there is inappropriate access and/or disclosure, corruption or loss of data</p>	<ul style="list-style-type: none"> Not implementing the new EU data protection legislation Lack of staff knowledge of policy and procedure Ineffective implementation of GDPR Regulation requirements Lack of an implementation plan for GDPR 	<ul style="list-style-type: none"> Data breaches Prosecution Fines Lack of confidence and public trust Reputational issues Member criticism 	20	<ul style="list-style-type: none"> Data sweeps Data governance Staff awareness Campaigns/refresher online training Data Protection Policy update May 2018 Follow up actions and lessons learnt communication to all staff through newsletters/all staff emails GDPR implementation plan in place Inclusion within re-launched corporate induction BDO Internal Audit review (June 2019) 	9	9	<ul style="list-style-type: none"> Continue with training on GDPR refresher courses for officers and members (ongoing) e-learning module available to all staff review and update of all policies and procedures (ongoing) Establish procedures and schedules to ensure clearance of stored documentation by December 2020 Data audits (ongoing) 	3	Governance & Risk Manager	Updated June 2020

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						Q4 19/20	Q1 20/21				
7	There are no clear plans for improving the economic prosperity and regeneration of Northampton.	<ul style="list-style-type: none"> Lack of skilled resource and vision Lack of local knowledge LGR creates political uncertainties No cohesive decision making in relation to regeneration strategy for Northampton between Officers and Members. 	<ul style="list-style-type: none"> Investors not investing in the town or pulling out of partnership arrangements Jeopardising current and future regeneration and growth projects Damage to Northampton as a place of choice 	16	<ul style="list-style-type: none"> Lessons-learned reviews being held Improved reporting through to CMB and EPB Plans being developed in terms of QA and process and service capability in structure Town Centre Masterplan developed by 'Northampton Forward' and adopted by The Council in October 2019. Development of growth team Delivery of Northampton Economic Growth Strategy (May 2020) Submission of business cases to enable Regeneration (FHSF, LGF etc) 	8	8	<ul style="list-style-type: none"> Feasibility of other project to help improve economic prosperity Further development of growth team 	2	Economic Growth & Regeneration Manager	Updated June 2020
8	NBC fails to manage its contractual partnerships with: <ul style="list-style-type: none"> LGSS NPH Veolia 	<ul style="list-style-type: none"> Loss of direct management control over activities Poor governance Lack of contract monitoring at officer level Lack of quality control Performance monitoring information is not developed Poor contract specification and understanding LGSS Services and structure review by owners 	<ul style="list-style-type: none"> Services not delivered to quality, time and cost Failure in fulfilling legal responsibilities Hindering the achievement of the councils objectives Negative impact to customers and stakeholders reputational risk to NBC Drop in services from LGSS 	12	<ul style="list-style-type: none"> Taking remedial action where required e.g. HR and Payroll coming back in-house Quarterly reports and meetings 	9	9	<ul style="list-style-type: none"> robust contract monitoring and quality control Continual review of LGSS contract Holistic/virtual team of contract managers to share good practice Internal audit report confirms adequate processes Regular discussions with LGSS MD/NCC S151/MK S151 	8	CFO (S151)	Reviewed June 2020

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9	Major or large scale incident (accident, natural hazard, riot or act of terrorism) business interruption affecting the council resources and its ability to deliver services and risk to safety of staff and loss of staff	<ul style="list-style-type: none"> Accident, natural hazard, riot or act of terrorism or other business interruption 	<ul style="list-style-type: none"> Lack of business continuity Council not able to deliver front-line services Council failing to meet statutory responsibilities Risk of safety to staff and loss of staff Customer needs not being met 	20	<ul style="list-style-type: none"> Updated business continuity strategy and business continuity plans partially in place with some services remaining outstanding Refreshed Critical Incident Plan Emergency Planning Work-streams facilitated by Emergency Planning lead including town centre evacuation procedures Establishment of Gold and Silver duty rota Review of high-rise buildings in the borough post-Grenfell On-going improvements identified and implemented as a result of participation in national and local exercises eg Cygnus (flu-pandemic) and Jerboa (flooding) exercises Involved in London Bridge preparedness Incident room manual reviewed and updated October 2019 Request for further nominees for EP roles circulated September 2019 Further training for emergency planning volunteers organised for October 2019 London Bridge Protocol updated October 2019 London bridge exercise 17th December 2019 Continuing improvements to BC and Emergency Planning procedures to be implemented post operations e.g. 2018 	12	12	<ul style="list-style-type: none"> Continuing work to ensure all services at the Council put in place a business continuity strategy and plan (On-going) Following the Covid-19 pandemic and emergency response Business Continuity plan format to be simplified SCG and TCG established and continue to respond to the Covid-19 pandemic Separate risk registers established for SCG and TCG Covid-19 response Clarify arrangements for business continuity responsibility for key partner organisations (On-Going) Identification and risk assessments of reception centres (On-going) 	9	CEO	Updated June 2020
10	Impropriety or improper business activities leading to fraudulent activity or malpractice	<ul style="list-style-type: none"> LGSS services returning - HR and Payroll - shifting accountabilities Lack of robust governance, procedure or process Lack of robust internal controls Inadequate reviews by internal audit on financial controls No assurance from LGSS on effectiveness of controls 	<ul style="list-style-type: none"> Avoidable financial loss Criminal prosecution Civil litigation Fines Lack of confidence from staff or public Reputational damage Member criticism 	15	<ul style="list-style-type: none"> Counter-fraud strategy in place NBC Fraud policy in place Section 151 controls Review of policy and procedure Review of LGSS Finance SLA and process Whistleblowing Policy approved by Council New suite of KPI's developed NBC fraud policy updated October 2019 	16	16	<ul style="list-style-type: none"> Quarterly balance sheet reviews of financial controls within LGSS Continued assurance of controls through bi-monthly contract management meetings with LGSS Targetted use of internal audit (BDO) in risk areas/services 	10	Governance & Risk Manager	Reviewed June 2020

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11	Significant decisions made at Council and Cabinet level are not sufficiently robust leading to ill informed decisions being made.	<ul style="list-style-type: none"> Inadequate governance Inadequate checks and balances 	<ul style="list-style-type: none"> Civil litigation, including judicial review Lack of confidence from staff or public Court cases Ombudsman reviews 	15	<ul style="list-style-type: none"> Additional/Increased cabinet clearance protocols in place Reworked clearance processes EPB Officer/Member interface in operation to ensure greater understanding prior to cabinet/council meetings Cabinet reports cleared by CMB 	12	12	<ul style="list-style-type: none"> Completeness now a higher indicator than recorded date. Recruitment of additional staff members in Democratic Services Q1 2020. Workshop held with Democratic Services Officers, agreed actions include tighter monitoring of clearance process; compliance times reiterated to senior managers and included in their diaries and the creation of a manual- to be completed in August 	10	Borough Secretary	Updated June 2020
12	Inability of IT to service future requirements and or loss of IT due to failure or cyber-attack	<ul style="list-style-type: none"> Poor governance Lack of contract monitoring Lack of quality control Increased external cyber attack numbers and complexity 	<ul style="list-style-type: none"> Services not being delivered to customers Business interruption Inefficient business processes and technology not adequately exploited - increased impact assessment due to Covid, remote working make 	15	<ul style="list-style-type: none"> Review of current LGSS SLA with IT to see what can be improved and remedial action taken IT policies and procedures reviewed and refreshed Review of IT equipment and infrastructure PSN Compliance achieved Lessons-learned review implemented following ransomware attacks in 2016/17 LGS Cyber self assessment completion completed October 2019 Cyber attack exercise 26th July 2019 to test staff and systems with a positive outcome - heightened awareness with Covid and remote working, regular staff updates to highlight risk of phishing/scams 	10	10	<ul style="list-style-type: none"> ICT Governance Meetings (On-going) ICT Client Meetings to assess relationships and risks (On-going) LGA stocktake results action plan implementation and ongoing work - 83% completed as at 31/03/20 heightened awareness and alert by ICT Teams to spot unusual activity and pass on any specific sector warning to service users 	10	CFO (S151)	Updated June 2020

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13	There is non-compliance with fire and Health and Safety legislation.	<ul style="list-style-type: none"> Lack of a clear strategy Processes not followed Audits and inspections not completed in a timely manner Recommendations not escalated or followed up by service areas 	<ul style="list-style-type: none"> Continuing lack of a clear strategy /strategic direction Death or injury to public or staff Criminal prosecution or civil litigation Service stopped Loss of public trust Action by H & S executive or Northants Fire and Rescue Fines to organisation Corporate manslaughter charges Insurance claims Financial loss 	20	<ul style="list-style-type: none"> Corporate Health & Safety Group set up and in place Upskilling of managers in terms of H&S responsibilities Audit & Inspection Framework in place H&S Matrix in place cross-referencing role profiles to required H&S training Review of H&S policies and procedures and refreshed where appropriate Refresher staff comms and training Fire Marshal training completed Implementation of mandatory on-line training courses for all staff Corporate Health Safety and Wellbeing Policy presented to Council and signed off on 9th July 2018. Creation of a H & S Committee Restructure of the H & S delivery and service (2018) Mandatory e-learning modules 	9	9	<ul style="list-style-type: none"> Communication and engagement with staff through information/training sessions (On-going) Continued progress with H & S audits and inspections Active engagement through H & S Committee of management, H & S Officers, staff and TU's. Review of H & S procedures and assurance provided by NPH Work starting to clear off outstanding audit and inspection recommendations (December 2020) 	6	Governance & Risk Manager	Updated June 2020
14	Safeguarding arrangements are not adequate to protect or address concerns of vulnerable adults and children.	<ul style="list-style-type: none"> Staff lack of awareness of procedure or referral route 	<ul style="list-style-type: none"> Children or vulnerable adults harmed or put at risk of harm Criminal prosecution or civil litigation Seriously damaging reputation or NBC 	20	<ul style="list-style-type: none"> Procedures and referral routes reviewed and refreshed where necessary Refreshed procedures and referral routes communicated Designated Officer for Safeguarding as point of contact in place Series of presentations on CSE, including with Members and staff, to build awareness Increased joint working with County Council (Rise Team), other boroughs and districts, including with community safety. licencing and social landlords Scrutiny Review of CSE in the Borough Scrutiny Review gone to Cabinet Established an NBC officer group for tackling CSE. Commenced implementation of recommendations arising from the above Cabinet report (June 2019) Response to scrutiny review (December 2018) Identification of a Safeguarding Champion within each service area (June 2019). 	9	9	<ul style="list-style-type: none"> Implementation of key audit recommendations from Safeguarding audit (December 2019) Development of a programme of e-learning training for staff (January 2020) New staff completing mandatory safeguarding training as part of the induction. BDO audit due August 2020 	9	Head of Housing	Updated July 2020

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15	Failure to deliver enough new housing to meet targets and needs	<ul style="list-style-type: none"> Local housing market housebuilders not wanting to devalue their product by flooding the market increasing land values Scarcity of experienced trades people and of materials. 	<ul style="list-style-type: none"> Not delivering enough housing to meet local demand Increase in homelessness and demand for temporary housing Failure to meet local targets Failure to meet Housing Delivery Test resulting in increased targets Potential loss of decision making role Inability to resist housing proposals in unsustainable locations 	16	<ul style="list-style-type: none"> Secured Planning Delivery Funding to recruit Housing Delivery Manager to liaise with housebuilders and establish what is delaying delivery Regular monitoring of local and market area delivery Flexible approach to planning applications Investigating investment in infrastructure to open up allocated sites and accelerate delivery Development of a Growth Deal to secure additional resources for affordable housing, infrastructure and capacity, and planning freedoms Promotion of role within Growth Corridor Cabinet approval of £4.2m Dallington relief road September 2018. HRA cap lifted. Limitation now is capacity to deliver and the sites available. 	9	9	<ul style="list-style-type: none"> Re-focus the Housing Delivery project to develop the Strategic Plan evidence base. Issues and options consultation has taken place (Dec 2019) and will be reported in January 2020 Discussing Growth Package with MHCLG as part of Central Area of the OxCam Growth Arc, including infrastructure funding to accelerate existing and future housing and employment opportunities. (Ongoing) 	9	Head of Planning	Refreshed March 2020
16	REMOVED Q3 2018: LGR risk, to be included within the main LGR project risk register										
17a	Impact of Brexit on NBC services.	<ul style="list-style-type: none"> Brexit deal/no deal 	<ul style="list-style-type: none"> Has a direct impact on NBC services directly 	4	<ul style="list-style-type: none"> Monitoring Brexit information Continual CMB checking on services/staffing 2 hour training for all of CMB in Jan/Feb 2019 Brexit lead for NBC identified Creation of a dedicated Brexit Risk Register 	4		<ul style="list-style-type: none"> Regular Government and Regional updates Engagement with MHCLG re Brexit regular calls throughout September/October 2019 Weekly brexit bulletins Engagement with LRF training in September 2019 	4	CMB	See Brexit risk register

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17b	Impact of Brexit on Northampton economy.	<ul style="list-style-type: none"> Brexit deal/no deal Uncertainty of timing of Brexit 	<ul style="list-style-type: none"> Supply chain and people impact on businesses Economic impact drives up benefit claims 	6	<ul style="list-style-type: none"> Monitoring Brexit information Continual CMB checking on services/staffing 2 hour training for all of CMB in Jan/Feb 2019 Brexit lead for NBC identified Creation of a dedicated Brexit Risk Register 	6		<ul style="list-style-type: none"> Regular Government and Regional updates Engagement with MHCLG re Brexit regular calls throughout September/October 2019 Weekly brexit bulletins Engagement with LRF training in September 2019 	6	CMB	See Brexit risk register
18	<p>Climate change: Failure to comply with:</p> <p>a) the Climate Change (2008) Act to reduce carbon omissions below 1990 levels by 2050.</p> <p>b) Making the Borough carbon neutral by 2030</p>	<ul style="list-style-type: none"> Low resources Rapid and large scale changes to operations outside NBC's control 	<ul style="list-style-type: none"> Contributing to the decline in short term changes to the climate 	9	<ul style="list-style-type: none"> Engagement with other local authorities in the quarterly 'Climate Change Strategy Group' Baseline report to Council in January 2020 	9	9	<ul style="list-style-type: none"> Strategic approach and policy to Cabinet Q2 2020 	4	Head of Planning	Refreshed March 2020
19	Loss of LGSS services	<ul style="list-style-type: none"> Collapse of LGSS as an entity LA's are requested to repatriate the services provided by LGSS i.e. finance, insurance, procurement, IT 	<ul style="list-style-type: none"> Impact on ICT Impact on finance/budgets Year end accounts Procurement Staffing challenges 	6	<ul style="list-style-type: none"> Monitor LGSS performance quality/volume Turnover of key LGSS staff 	6	9	<ul style="list-style-type: none"> Regular discussions with LGSS MD/NCC S151/MK S151 Discussions with NCC over delivery of LGSS services under lead authority model 	6	CFO (S151)	Updated June 2020