

CORPORATE RISK REGISTER

LIKELIHOOD	A Very High			3 5	14
	B High			15 16 17	1 7
	C Medium			4 6 10 12 13 18	
	D Low / Very Low				
		4 Insignificant	3 Minor	2 Moderate	1 Major
	IMPACT				

RISK NO.	RISK SCORE	DESCRIPTION
1	B1	Local Plan
3	A2	Welfare Reform
4	C2	Finance Resilience
5	A2	Economic Development
6	C2	Data/Information
7	B1	Business Continuity
10	C2	Housing Capital Finance
12	C2	Waste Management
13	C2	Cyber Security
14	A1	Delays in issuing Planning Permission
15	B2	Climate Emergency
16	B2	Accommodation project
17	B2	Travel plan
18	C2	Qualis

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Risk No 1 Local Plan	<p>Vulnerability: Without an adopted Local Plan and with the introduction of the Housing Delivery Test from November 2018, the Council's ability to deliver housing at the required rate will lead to the presumption in favour of sustainable development being applied and the requirement to prepare an action plan.</p> <p>Consequence: Without an adopted plan setting the Council's housing requirement at 518 the measurement used will be the 2014 household projection figures/standard method for assessment with an annual requirement of 923 homes. This will result in vulnerability to planning appeal decisions and potential development in the Green Belt as the presumption in favour of sustainable development will apply.</p>	<p>The failure to deliver at the required threshold set out in the NPPF of 95% of the housing requirement over the previous three years triggers a requirement for the Council to prepare an action plan in line with national planning guidance to assess the causes of under delivery and identify actions to increase delivery. Although there are transitional arrangements with lower thresholds for November 2018 and 2019, the delay in submitting the Local Plan as a result of the Judicial Review and Natural England's requirement not to issue planning decisions until a mitigation strategy is in place for Epping Forest SAC, is likely to have ongoing consequences for delivery. There is now further delay as a result of Natural England's objections to the Habitat Regulations Assessment, which has led to the Inspector's advice that further work is required to inform the mitigation strategy, which is now underway.</p>	VERY HIGH	MAJOR	A1	<p>1) Local Plan Submission Version 2017 agreed by Council on 14 December 2017 and published between 18 December 2017 and 29 January 2018. Following the JR the plan was submitted for examination in September 2018 and hearings have now taken place between February and June 2019. The Inspector's advice issued on 2 August 2019 requires the Council to undertake further work to support the Local Plan, which is now underway.</p> <p>2) Revised Local Development Scheme (LDS) adopted by Local Plans Cabinet Committee 22 November 2018 following submission of plan for independent examination.</p> <p>3) Systematic approach to Duty to Co-operate, engaging public bodies including Natural England and the Conservators.</p> <p>4) Consultants in place to support project management, resource planning, Sustainability Assessment, transport modelling, master planning.</p> <p>5) Regular reports at officer and Member level through the Cooperation for Sustainable Development Group.</p>	HIGH	MAJOR	B1	<p>1) Programme of work to agree the Main Modifications is in preparation for agreement with the Local Plan Inspector.</p> <p>2) Review progress against new key milestones.</p> <p>3) Important that key decisions do not precede Duty to Co-operate i.e. "fait accompli".</p> <p>4) Ongoing review of strategy and Service Structure salaries by senior planners and Leadership Team. Scrutiny Function to be undertaken by Stronger Place Select Committee.</p>	Planning Services Director	1) Regular programme meetings to monitor progress – initially weekly but then monthly

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Risk No 3 Welfare Reform	<p>Vulnerability: The government has pledged to make substantial savings from the overall welfare bill. This will require a major reform of the welfare system which is likely to have serious impacts on the Council and the community. This includes Universal Credit, changes to Council Tax and other benefits and direct payments to tenants.</p> <p>Consequence:</p> <ul style="list-style-type: none"> • Tenants no longer able to afford current/new tenancies. • Increase in evictions and homelessness • Increased costs of temporary accommodation • Unable to secure similar level of income due to payment defaults • Increase in rent and Council Tax arrears • Public dissatisfaction • Criticism of the Council for not mitigating the effects for residents. 	Welfare reform changes have a detrimental effect on the Council and community.	VERY HIGH	MAJOR	A1	<p>Cross-service and sector working group established to access impacts of the introduction of Universal Credit and to produce an action plan to mitigate the effects.</p> <p>Working group has been created to meet on a regular basis.</p>	VERY HIGH	MODERATE	A2	Action Plan to be developed by the end of 2019/20 by baselining the effects of Universal Credit for implementation in 2020/21.	Customer Services Director	Monthly

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Risk No 4 Finance Resilience	<p>Vulnerability:</p> <p>Local Authorities are increasingly dependent on locally generated income and from 2020/21 onwards there is little information on future funding. Until the Fair Funding Review is completed it remains difficult to forecast revenue streams for future years. The Fair Funding review will look at how business rate income is distributed amongst authorities, but it is unlikely this authority will see any increase in real terms unless additional responsibilities are passed on as a result. There are a large number of rating appeals received where the outcome is uncertain. With the increasing possibility of a no deal Brexit, a number of income sources could be adversely affected. The Council is heavily reliant on income from commercial rentals and it is possible that businesses will find trading conditions more challenging and insolvency may become more common. This of course also affects business rates. The medium-term financial strategy requires substantial net CSB reductions over three years.</p> <p>The risk is the Council will not deliver to budget and either:</p> <ul style="list-style-type: none"> will overspend or under-recover income (from Qualis) or will underspend and become over risk adverse by holding developments and capital schemes. 	<p>Unable to secure required level of income due to reduced demand for services, changes in legislation, changes in economic conditions or adverse change in funding mechanisms.</p> <p>The Budget is due to be set by Council in February 2020. It highlights a much larger investment and transformation plan than normal, almost entirely funded from new receipts from Qualis (other receipts including growth in council tax base are small). The financial strength of the Council (despite significant reserve balances) is purposefully designed to become more reliant on income from Qualis (alongside fee, charges and rental income).</p> <p>Receipts from NNDR and Council Tax become less significant in setting the economic and fiscal future of the Council.</p>	HIGH	MAJOR	B1	<p>Monitoring of expenditure, key income streams and NDR tax base. Savings opportunities pursued through service reviews and corporate restructure.</p> <p>Qualis income equal and opposite to new development costs, planned that as income comes in from Qualis, development proposals go ahead</p> <p>Majority of Qualis income secured by loans and recharges the date of which they happen is determined by EFDC.</p> <p>Usable reserves over targets sets and additional balances due to be added this year.</p> <p>improved business partner assistance and intervention in budget control issues</p>	MEDIUM	MODERATE	C2	<p>Update Medium Term Financial Strategy as announcements are made on changes to central funding and welfare. Continue to pursue opportunities to reduce net spending. Develop the use of KPI's to understand areas with potential growth/income.</p>	Director - Business Services	Regular programme meetings to monitor progress – initially weekly but then monthly

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	Consequence: Council unable to meet budget requirements Staffing and service level reductions Increase Council Tax Increase in charges Greater use of reserves if required net savings not achieved. Higher level of saving required in subsequent years. Poor value for money and slower and more cautious approach to service improvement and sustainable development											

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Risk No 5 Economic Development	<p>Vulnerability:</p> <p>Economic development and employment is very important, particularly in the current economic climate. The Council needs to be able to provide opportunities for economic development and employment (especially youth employment) in the District.</p> <p>Consequence:</p> <ul style="list-style-type: none"> • Unable to secure sufficient opportunities • Local area and people lose out • Insufficient inward investment • Impact on economic vitality of area • Loss of revenue 	Risk that Council performs relatively poorly compared to other authorities.	VERY HIGH	MAJOR	A1	<p>Economic Development Plan (Nurturing Growth) was drafted and presented to Economic Development Board and subsequently to Cabinet Cttee for approval. Cabinet requested further consultation with stakeholders, and this was carried out through October & November, culminating in a consultation event on November 13th. A report is currently being written which will be presented to Cabinet in February, to seek approval for development of an Action Plan and related resource requirements.</p> <p>Too early to determine effectiveness.</p>	VERY HIGH	MODERATE	A2	<p>Stakeholder consultation event took place in November'19</p> <p>Report to Cabinet March 2020, with recommendation to resource a Delivery Plan linked to the O&S Local High Streets Task & Finish Review</p> <p>Subject to Cabinet agreement, Economic Dev Implementation Plan to be developed as from April/May 2020</p>	Community and Partnerships Service Director	Monthly

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Risk No 6 Data / Information	Vulnerability: The authority handles a large amount of personal and business data. Either through hacking or carelessness, security of the data could be compromised. Consequence: <ul style="list-style-type: none"> Breach of the 2018 Data Protection Act (DPA) and the General Data Protection Regulations leading to significant fines or/and intervention by the Information Commissioner's Office (ICO) Increased costs and legal implications Reputation damaged and loss of public confidence 	Risk of data held by the Council ends up in inappropriate hands. System loss. Generally effective to date, with no significant lapses since the introduction of the 2018 DPA	HIGH	MAJOR	B1	<p>Significant work was undertaken by the Council to ensure it was compliant in time for the introduction of the GDPR in May 2018. This included review of policy and procedures, staff and Member training and awareness, completing an information asset register/register of processing activities and reviewing security of data arrangements.</p> <p>The Council continues to have a designated Data Protection Officer in post and a system of data breach and subject access request monitoring in place.</p> <p>A recent audit on data retention and disposals has been completed which identified a number of actions. The actions will be reviewed and monitored through the Information Governance Group</p>	MEDIUM	MODERATE	C2	The introduction of the Corporate Information Governance Group will review current arrangements and ensure these are strengthened where required.	Service Director – Business Services (SIRO)	Quarterly

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Risk No 7 Business Continuity	<p>Vulnerability:</p> <p>The Council is required to develop and implement robust Business Continuity Plans in line with the requirements of the Civil Contingencies Act.</p> <p>Following the re-organisation and negative outcomes from Internal Audit's review plans need to be updated and changes in responsibilities confirmed.</p> <p>Consequence:</p> <ul style="list-style-type: none"> Services disrupted / Loss of service Possible loss of income Staff absence Hardship for some of the community Council criticised for not responding effectively 	<p>An Internal Audit of Business Continuity arrangements identified a number of weaknesses which are being addressed through the BC project.</p> <p>An external consultant has been engaged to develop the strategy and provide coaching to staff to develop plans. This has largely been completed and an exercise to test was undertaken in Feb 2020.</p>	VERY HIGH	MAJOR	A1	<p>Improvement of current business continuity (BC) management arrangement is currently in progress.</p> <p>Impact of coronavirus needs considering</p>	HIGH	MAJOR	B1	<p>Complete the business continuity project plan and thereafter embed business continuity within the Council, to include periodic tests and exercises</p>	Commercial and Regulatory Services Director	Quarterly

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Risk No 10 Housing Capital Finance	<p>Vulnerability:</p> <p>If the Council is unable to spend right to buy receipts in set timescale on qualifying capital schemes, we will have to pay the money to the Government along with interest at a penalty rate.</p> <p>Changes to legislation which reduce income to the HRA.</p> <p>Consequence:</p> <ul style="list-style-type: none"> • Loss of capital resources • Revenues cost of penalty interest • Loss of rental income • Delays in provision of new social housing • Increase in housing waiting list • Current 30-year business plan may become unsustainable. 	<p>Risk schemes are delayed by either the planning process or unanticipated site problems.</p> <p>Imposition of further restrictions on rent levels.</p>	HIGH	MODERATE	B2	<p>1) Position being monitored by the House Building Cabinet Committee and a number of contingency options are available including purchasing homes or land on the open market or purchasing from S106 developments. A Consultant has been engaged to work to utilise the receipts before the deadline of the end financial year.</p> <p>2) The Council belongs to the Association of Retained Council Housing which lobbies on such issues.</p> <p>3) Limited effectiveness to date.</p>	MEDIUM	MODERATE	C2	<p>1) Loss of right to buy receipts is minimised.</p> <p>2) Impact of Policy changes is minimised as far as possible.</p>	Service Manager Housing Management and Home Ownership	1) Monthly

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Risk No 12 Waste Management	<p>Vulnerability: Inability of the Council's partnering contractor, Biffa Municipal Limited to secure profitable outlets for recycling materials processed through the Material Recycling Facility (MRF) could result in diminishing income.</p> <p>Consequence:</p> <ul style="list-style-type: none"> Reputational damage to the Council if recycling materials is sent to landfill. Additional costs to the Council if Biffa cannot sell materials. Additional costs under pain/gain share mechanism in the contract if the income from recycling continues to drop or worst case becomes a cost. 	There has been significant drop in income from the sale of recycling materials especially paper, caused primarily by the Chinese government decision to ban import of MRF paper. This has resulted in saturation in the commodity markets.	HIGH	MODERATE	B2	<p>Financial settlement has been agreed with Biffa to improve the quality of recycling output from Biffa's processing plant.</p> <p>Due to volatility of sale prices of recycling materials the contractual arrangement of Recycling Index Unit Rate (RIUR), agreed at the anniversary of the contract, is to be continued to be monitored closely.</p>	MEDIUM	MODERATE	C2	To continue to monitor the costs and market fluctuations.	Contracts and Technical Services Director	Monthly

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Risk No 13 Cyber Security	<p>Vulnerability: The Authority handles a large amount of personal and business data. Either through hacking or carelessness, security of the data could be compromised.</p> <p>Consequence:</p> <ul style="list-style-type: none"> • Loss of system access and/or data • Unable to provide Council services • Increased costs • Reputation damaged • Ransomware payment 	Risk of data held by the Council ends up in inappropriate hands. System loss. However, no loss of data. Systems have remained protected from cyber-attack.	VERY HIGH	MAJOR	A1	<p>Security Officer is continually monitoring situation and potential risks. Most systems have in built controls to prevent unauthorised access.</p> <p>Controls in systems have been strengthened in response to specific occurrences.</p> <p>Data is backed up daily with forty days retained. Three backups are also stored off site.</p> <p>Staff training.</p> <p>Disaster recovery solution being implemented by 'Modern Network'. By 31 March, can recover data within 7 mins in real time.</p> <p>Disaster recovery plan to be produced, project managed with ICT. Leading to no need for back up</p>	MEDIUM	MODERATE	C2	<p>Continued funding for robust perimeter protection system.</p> <p>Continued investment in training to ensure that staff recognises potential cyber threats. Ensure that there is "buy in" by both user and management as cyber security is not just the responsibility of IT.</p> <p>Further develop ICT Recovery Plan.</p>	Business Services Director	Quarterly

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Risk No 14 Delays in issuing Planning Permission	Vulnerability: Delays in issuing Planning Permission for development due to objections by Natural England regarding the impact of development on air quality in Epping Forest SAC. Consequence: <ul style="list-style-type: none"> Delays in granting Planning Permission in the District and getting an adopted Local Plan in place. Loss of New Homes Bonus Restricted Business Rates tax base growth Reputation damaged 	The Habitats Regulations Assessment (HRA) January 2019 found that the Plan would be likely to have a significant effect upon the Epping Forest Special Area of Conservation (the SAC) in respect of both atmospheric pollution and disturbance from recreation & urbanisation.	VERY HIGH	MAJOR	A1	Regular meetings held with key stakeholders including Natural England to update the HRA and develop a mitigation strategy. Interim mitigation strategy has been agreed by Council in October 2018 to mitigate the impact of recreational pressure on the Forest and Natural England have confirmed it is appropriate. Draft Air Quality Strategy developed but further work required to finalise as a result of additional work to update the HRA following the advice from the Inspector. Mitigation strategy being developed with Natural England. Counsel opinion - Council action is sound	VERY HIGH	MAJOR	A1	Mitigation strategy in place for both recreational pressure and air quality issues. Further report to be taken to Cabinet on 6 January 2020 to update members on the risks associated with the issuing of decisions.	Planning Services Director	Monthly – regular updates are being provided to the inspector

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Risk No 15 Climate Emergency	Vulnerability: The Council declared a climate emergency and has pledged to do everything within its power to make the Epping Forest District carbon neutral by 2030. The Council has identified a number of initial areas of focus, including: Local Plan site allocations achieving high standards of sustainability; carbon reduction of council owned properties; the promotion of sustainable transport and implementing an air quality strategy. Consequence: <ul style="list-style-type: none"> Reputational damage. 	Failure achieving identified carbon reduction targets/actions.	VERY HIGH	MODERATE	A2	A Climate Change Officer has been proposed. Applications for post has been received; recruit process in place – potential in place by June	HIGH	MODERATE	B2	To consider additional ways to reach the carbon neutral goal, such as a focus on climate within the procurement strategy. Establish lines of communication with neighbouring districts and Essex County Council to work towards common goals.	Chief Executive	Quarterly

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Risk no 16 Accommodation project	Failure of the accommodation project to deliver: <ul style="list-style-type: none"> • New ways of agile working • Better use of Council assets • Financial savings which ultimately impacts on the Council's objectives and delivery of services	Background: The Council has embarked on ambitious plan for the renovation and refurbishment of the civic offices that will involve a decant and repopulation of staff and Members. As well as offering space to external partners. Effects <ul style="list-style-type: none"> • Affecting staff wellbeing leading to a loss of staff and organisational knowledge, which impacts on delivery of Council services • Need to ensure IT resilience that supports agile working practices 	Very high	Major	A1	<ul style="list-style-type: none"> • Monthly meetings of the newly created Accommodation Board, which will oversee the workstream action plans • Dedicated programme manager • Use of specialist for procurement and major works 	High	Moderate	B2	Creation and monitoring of workstream action plans	Sacha Jevans	Monthly

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Risk 17 Travel plan	Failure of the Travel Plan compromises the Council's Accommodation Strategy	<p>If staff are unable/unwilling to work and travel flexibly due to a poorly designed or implemented Travel Plan this could impede the delivery of the Council's Accommodation Strategy.</p> <p>This increases the risk of demotivated staff leading to poor performance and inefficiencies.</p>	High	Major	B1	Staff engagement with the Travel Plan through the survey and key messages delivered through staff communications	High	Moderate	B2	Develop and implement processes to deliver the Travel Plan including understanding the implications of car sharing to and from NWA, and reviewing car parking arrangements	Service Director Contracts and Technical Services	Monthly

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Risk 18 Qualis	The Council is heavily reliant on income from Qualis e.g. margin on loans, shared services and ultimately dividends from 2020/21.	<p>Much of the income from Qualis is relatively risk free but delays in development planning approvals could significantly impact on the timing of income; also for asset purchase and construction finance leading to a loss of Council income in 202/21 meaning developments cannot go ahead.</p> <p>The set-up of the Qualis Management company is underway with an operational date 'go live' of July 2020</p>	VERY HIGH	MAJOR	A1	<p>Oversight through the Group Company Steering Group/ interim Board until the Qualis Board is in place.</p> <p>Annual review of Qualis business cases and Business Plans by Cabinet.</p> <p>Impact of the Qualis annual business case feeds into EFDC's Annual Budget for approval by Cabinet and recommended for approval to Council.</p> <p>Cabinet decision on any loans to Qualis.</p> <p>Quarterly progress reports from Qualis to Cabinet.</p> <p>Section 151 Officer able to exercise the "open book" requirement and report to Cabinet.</p>	MEDIUM	MODERATE	C2	<p>The Section 151 Officer will act on behalf of EFDC as the main conduit with Qualis Group and other Qualis Companies.</p>	Section 151 Officer	March 2020