



# Risk Management Policy for Coltishall Parish Council

This policy was agreed on 12<sup>th</sup> July 2021

Next review due July 2022

Signature \_\_\_\_\_ Chairman \_\_\_\_\_ Parish Clerk

## About the Council

Coltishall Parish Council is a small parish council as defined by the Local Audit and Accountability Act 2014. The Council has varying activities and functions and is currently insured through BHIB Insurance Brokers. The Insurance Policy is held with Aviva Insurance Ltd for a term of 1 year and is due for renewal 5<sup>th</sup> October 2021.

The contact details for the insurance broker is: BHIB Tel: 0330 024 0606 Email: [enquiries@bhibinsurance.co.uk](mailto:enquiries@bhibinsurance.co.uk)

The Clerk retains the insurance file and deals with matters relating to risk and insurance. This is detailed in the Clerk's Job Description and supported by 'Governance and Accountability 2016'. The Council supports the Clerk in this role by providing training opportunities and undertaking risk assessments of the parish assets. The Council agrees the Risk Management Policy which is reviewed every year.

The Council documents relevant to this assessment are: Financial Regulations, Standing Orders, Code of Conduct and Asset Register.

RFO = Responsible Financial Officer (usually the Parish Clerk)

## Main Actions in relation to risk management

- The Asset Register is updated during the course of the year by the Clerk.
- Risk assessments (Health and Safety) are written and updated.
- Copies of risk assessments are retained.
- Sites are inspected at least annually and records are retained.
- Play Areas are inspected weekly and an annual inspection must be carried out by an external qualified inspector. All inspections must be retained for at least 22 years.
- The Council reviews the Insurance Policy prior to renewal.
- Financial Risk Assessments are carried out by the Clerk / Responsible Financial Officer, as required.
- Documentation is kept safely and securely.
- The Council reviews its systems of Internal Control at least quarterly.

<b>Aim: 1.</b> To ensure compliance with the law, Council's Financial Regulations and Code of Conduct.		
<b>Risk</b>	<b>Method used to minimise risk</b>	<b>Person(s) responsible</b>
1. Lack of knowledge of regulations and codes.	Ensure that the Council has access to copies of relative Acts as required and councillors receive their own copies of the Code of Conduct, Standing Orders and Financial Regulations. All new councillors required to attend new councillor training and refresher courses as needed	Chairman/Clerk
2. Absence of Standing Orders.	Ensure that Standing Orders and Financial Regulations are produced, understood by councillors, and reviewed every four years or as circumstances demand	Chairman/Clerk
3. Actions by the PC outside its powers laid down by law.	As at 1 but ensure that powers are highlighted or extracted into effective summary.	Chairman/Clerk
4. Lack of adherence to regulations and procedures.	Reference to appropriate regulations as required.	Chairman/Clerk
5. Items purchased without proper tendering procedures, resulting in accusations of commercial favouritism or poor value.	Ensure that all councillors are aware of regulations re estimates and full tender procedures (see Financial Regulations).	Clerk/RFO
6. Payments made without prior approval and adequate control.	Ensure all payments are approved in Council meetings and recorded in minutes. Keep cash and cheque payments to a minimum and avoid if possible. Change to a banking system which ensures online payments/transfers/standing orders can not be independently made and require approval from at least one other party who is not responsible for internal control.	Clerk/RFO/All Councillors/Internal Auditor

7. Lack of control of signatories to cheques and bank account	Keep authorised signatories to a minimum consistent with practicalities.	Clerk/RFO/Internal Auditor
8. VAT not properly accounted for, resulting in over-claims and large demands from Customs & Excise	Ensure appropriate publications held and that Clerk has good knowledge of regulations	Clerk/RFO/Internal Auditor

**Aim: 2.** To identify and regularly review the Council's priorities.

<b>Risk</b>	<b>Method used to minimise risk</b>	<b>Person(s) responsible</b>
1. Lack of knowledge of how to set objectives, set priorities, and identify risks to their achievement.	All councillors to be made aware of need for objectives and identification of risk. Attend training sessions if practicable.	Clerk/Chairman
2. Lack of risk assessment	All councillors to be made aware of need for objectives and identification of risk. Attend training sessions if practicable.	Clerk/Chairman

**Aim: 3.** To influence other council authorities and Government organisations to consider the views of our parishioners.

<b>Risk</b>	<b>Method used to minimise risk</b>	<b>Person(s) responsible</b>
1. Lack of effective lines of communication with other organisations.	Note all communication lines which are essential or beneficial and make information available to all councillors. Establish contacts by name and where possible face-to-face.	All councillors/Clerk
2. Lack of effective lines of communication with parishioners.	Take every opportunity to publicise role of Parish Council. Utilise parish magazines etc. Effective use of Notice Boards and "flyers". Use key issues to raise profile of PC and to test parishioners' views. Add social events to occasional meetings. Create Annual PC report and put to parishioners for comment.	All councillors/Clerk
3. Lack of preparation on subjects requiring influence.	Ensure that all councillors are aware of need for careful research and are guided as to where to obtain relevant information on issues under discussion.	All councillors/Clerk
4. Lack of confidence by Parish Councillors.	As at 1 above. Experienced councillors to assist newcomers to establish essential contacts. Delegate responsibility for specific contacts to individual councillors.	All councillors/Clerk

<b>Aim: 4.</b> To ensure that all councillors are aware of their responsibilities, and possible liabilities and to provide adequate insurance cover for all possible risks.		
<b>Risk</b>	<b>Method used to minimise risk</b>	<b>Person(s) responsible</b>
1. Lack of knowledge of possible culpability of councillors.	Refer to Standing Orders and provide familiarisation with those where greatest risk occurs.	Clerk/Councillors
2. Lack of education of councillors regarding culpability.	As at 1 above. Attend any training courses available, including induction/new councillor training.	Clerk/Councillors
3. Inadequate insurance cover taken out – property, personal liability, employer’s liability and public liability.	Review risk assessment by including on agenda of PC meetings on an annual basis.	RFO/Clerk

<b>Aim: 5.</b> To keep appropriate books of account accurately and up-to-date throughout the financial year.		
<b>Risk</b>	<b>Method used to minimise risk</b>	<b>Person(s) responsible</b>
1. Lack of knowledge of accounting requirements	Ensure all councillors are familiar with current financial regulations and include them in Standing Orders/Financial Regulations. Regularly review Standing Orders and Financial Regulations.	Chairman/Clerk
2. Lack of commitment to accounting requirements	As at 1 above. RFO to produce financial reports quarterly. Internal audit reports to be made available to all councillors and any recommendations to be acted upon promptly.	Chairman/Clerk
3. Bank charges unnecessarily incurred.	RFO to carry out regular inspection of books of account. Internal audit checks to be undertaken periodically during the current financial year.	Clerk/RFO/ Internal Audit Control Officer
4. Inaccuracies in recording amounts, totals in books of account and bank reconciliations	RFO to ensure books of account are formatted in such a way that internal controls are included and activated. Quarterly internal checks to be carried out and an internal audit annually	Clerk/RFO/ Internal Audit Control Officer/ Internal Auditor
5. Inaccuracies and interest losses caused by account transfers.	Keep number of accounts to a minimum; ensure that any large credit balances are deposited in an interest-bearing account.	Clerk/RFO

6. The most beneficial interest terms not being employed	Ensure that favourable interest rate is obtained in deposit accounts and review against alternatives but bearing in mind the risks in changing accounts.	Clerk/RFO with Councillors
7. Inadequate control of cash receipts and payments. Loss of cash through theft or dishonesty.	Avoid cash payments and receipts if possible. Where cash payments and receipts are unavoidable use a properly controlled petty cash account with a set maximum balance.	Clerk/RFO
8. Books of account not kept up to date/ invoices not posted promptly	Regular checks by RFO, Internal Audit Control Officer and Internal Auditor. Financial reports quarterly.	Clerk/RFO
9. Internal controls not in place or not operated	As at 8.	Clerk/RFO
10. Payments missed or delayed due to inadequate filing of invoices	As at 8.	Clerk/RFO
11. Clerk taken ill or leaves without replacement.	Appoint a councillor as RFO to be familiar with all aspects of financial matters or appoint another Clerk on temporary basis until situation resolved. Ensure PC has sufficient funds in reserve to pay for a locum clerk if the Clerk is absent for a significant period.	Clerk/RFO

**Aim: 6.** To ensure that payments made from council funds and the use of assets, represent value for money, are adequately managed, and comply generally with the wishes of the parishioners.

<b>Risk</b>	<b>Method used to minimise risk</b>	<b>Person(s) responsible</b>
1. Lack of knowledge of wishes of parishioners	Ensure they are consulted on all major financial issues.	Councillors/ Clerk/RFO
2. Use of funds not giving value for money	Effective budget planning processes and creation of annual plan after consultation process. Creation of outline 2-3 year plan.	Councillors/ Clerk/RFO
3. Use of funds not in accordance with the wishes of the parishioners.	Undertake regular consultations.	Councillors/ Clerk/RFO
4. Charges for use of facilities inadequate (e.g. allotments and CAST)	Effective financial management by RFO plus regular reviews.	Clerk/RFO

**Aim: 7.** To ensure that the annual precept requirement results from an adequate budgetary process; progress against the budget is regularly monitored; and reserves are appropriate.

<b>Risk</b>	<b>Method used to minimise risk</b>	<b>Person(s) responsible</b>
1. Lack of knowledge of budgetary process, and Council regulations	Include regulations in Standing Orders issued to all councillors. Delegate responsibility for managing budgetary process.	Clerk/RFO
2. Lack of commitment to budgetary process	As at 1 above. Involve all councillors in budgetary process	Clerk/RFO
3. Inadequate consideration of requirements for annual precept.	Place item on agenda early in Autumn to remind councillors of budget process and actions required. Delegate responsibility for managing budgetary process. Start consideration of calculation at least two months prior to submission date. Create annual and 2-3 year plans to assist in process.	Clerk/RFO
4. Calculation not in accordance with Council regulations	Checks to be carried out regularly.	Clerk/RFO/ Internal Auditor
5. Inadequate internal controls with regard to monitoring expenditure	Checks to be carried out regularly. Financial and budget progress reports given quarterly	Clerk/RFO/ Internal Auditor
6. Reserves inappropriate	Checks to be carried out regularly. Financial and budget progress reports given quarterly	Clerk/RFO/ Internal Auditor

<b>Aim: 8.</b> To explore all possible sources of income, and to ensure that expected income is fully received		
<b>Risk</b>	<b>Method used to minimise risk</b>	<b>Person(s) responsible</b>
1. Lack of knowledge of possible sources of income e.g. grants	Seek advice, as appropriate, on grants available	Clerk/RFO
2. Lack of commitment to pursue possible sources of income	Seek advice, as appropriate, on grants available	Clerk/Councillors
3. Receipts not banked or not banked promptly	Regular checks carried out. Internal Audit checks	Control Officer/ Internal Auditor
4. Debts not pursued promptly	As at 3.	As above
5. VAT claims not made promptly or made incorrectly	Ensure RFO keeps up-to-date with regulations. Regular checks carried out	As above

<b>Aim: 9.</b> To ensure that salaries paid to employees and amounts paid to contractors are paid in accordance with council regulations, and adequately monitored.		
<b>Risk</b>	<b>Method used to minimise risk</b>	<b>Person(s) responsible</b>
1. Inappropriate rate of pay to employees.	Ensure employee regulations are available and understood by Clerk. Internal audit checks	Clerk/RFO/ Councillors/ Internal Audit Control Officer/ Internal Auditor
2. Tax and NI arrangements not in accordance with regulations	As at 1.	As above
3. Amounts paid to contractors not in accordance with contract and inadequately monitored.	Internal audit checks. Councillor to monitor contract work carried out, as appropriate	As above

<b>Aim: 10.</b> To ensure that year end accounts are prepared on the correct accounting basis, on time, and supported by an adequate audit trail.		
<b>Risk</b>	<b>Method used to minimise risk</b>	<b>Person(s) responsible</b>
1. Lack of knowledge of Council regulations and procedures.	Refer to Financial Regulations and Standing Orders. Attend training seminars where available.	Clerk/RFO/ Councillors
2. Late or non-submission of annual accounts.	Refer to Audit Plan. Monitor progress against timetable and report to PC meetings.	Clerk/RFO
3. Year-end accounts not prepared, inaccurate, or not in accordance with Council requirements.	Internal Audit checks	Clerk/RFO/ Internal Audit Control Officer/ Internal Auditor
4. Inadequate audit trail from records to final accounts	As at 3 above.	As above

<b>Aim: 11.</b> To identify, value, and maintain all the assets of the Parish Council, and ensure that asset and investment registers are complete, accurate and properly maintained		
<b>Risk</b>	<b>Method used to minimise risk</b>	<b>Person(s) responsible</b>
1. Lack of knowledge of assets of Parish Council.	Ascertain and record all assets for which Parish Council is responsible. Maintain Asset Register.	Clerk/RFO
2. Assets lost or misappropriated	Establish who is responsible for security and maintenance of each asset. A map of the location of fixed assets should be held and regularly updated along with a list of the names of those holding mobile assets.	Clerk/RFO
3. Inadequate or inaccurate valuation of the Council's assets	Arrange for periodic review of valuations and arrange for professional valuation where necessary. Internal audit checks.	Clerk/RFO/ Internal Auditor
4. Asset Register not established or inadequately maintained.	Asset Register regularly checked for accuracy.	Clerk/RFO
5. Damage to third party property or individuals as a result of Council providing services or amenities to the public.	Public liability insurance held (minimum of £10 million) and reviewed annually. Regular checks on assets carried out.	Clerk/RFO/ Councillors



<b>Aim: 12.</b> To comply with appropriate Government legislation regarding disability, racial equality, safeguarding children etc.		
<b>Risk</b>	<b>Method used to minimise risk</b>	<b>Person(s) responsible</b>
1. Lack of knowledge of applicable legislation.	Clerk to know where to go for advice and training. Review liabilities and responsibilities periodically at PC meetings.	Clerk/councillors
2. Failure to comply applicable legislation.	As above.	Clerk/councillors

<b>Aim: 13.</b> To carry out adequate safety checks on all buildings, properties, land and equipment for which the council is responsible.		
<b>Risk</b>	<b>Method used to minimise risk</b>	<b>Person(s) responsible</b>
1. Lack of information on land, buildings and equipment.	Include in Asset Register all assets for which PC is responsible. Ensure that electrical items are PAT tested.	Clerk/Councillors
2. Lack of knowledge of safety requirements.	Ensure that all current legislation is complied with.	Clerk/Councillors
3. Lack of commitment to carrying out safety checks.	As at 2 above. Delegate responsibility for checking properties/equipment/land to individual councillors or working groups. Checks on all areas looked after by the Parish Council will be at least annually.	Clerk/Councillors

<b>Aim: 14. To ensure IT security for Clerk/RFO</b>		
<b>Risk</b>	<b>Method used to minimise risk</b>	<b>Person(s) responsible</b>
1. Inadequate safeguards to prevent viruses and other intrusions damaging Council documents.	Ensure virus protection/firewall in place on Clerk's laptop.	Clerk
2. Loss of data.	Ensure PC data is backed up to cloud and password protected	Clerk/RFO
3. Inappropriate copying/use of data.	Comply with Data Protection Act 1998 and future GDPR Act	Clerk/RFO/ Councillors

<b>Aim: 15. To ensure the safety of public at meetings and events organised by the PC.</b>		
<b>Risk</b>	<b>Method used to minimise risk</b>	<b>Person(s) responsible</b>
1. If someone is taken ill	First aider is in attendance at significant events organised by the PC. Use a mobile phone at PC meetings/public meetings in event of emergency to call emergency services.	Clerk/Event Organiser
2. If someone trips or slips	As 1. plus visual checks of furniture/equipment	As above
3. If someone is electrocuted	As 1. plus check wires are secured etc	As above
4. Fire breaks out	Ensure escape routes are free from obstructions and fire exits are clearly marked.	As above
5. General	Ensure that risk assessments are carried out prior to the event, advise insurer of the event, and organise additional insurance cover, if appropriate.	As above

<b>Aim: 16. To ensure Parish Council adheres to Data Protection law</b>		
<b>Risk</b>	<b>Method used to minimise risk</b>	<b>Person(s) responsible</b>
1. PC fails to adhere to data protection rules – complaints received due to a data protection breach or a complaint to the Information Commissioner’s Office.	Data Protection Officer (DPO) appointed.  Clerk and councillors trained in data protection.  Data Protection Working Group set up (with terms of reference) to monitor work of DPO, ensuring the council’s role as Data Protection Controller is carried out correctly.  Data protection policy adopted and information audit regularly reviewed.	Council  Clerk  Council  Clerk and Council

<b>Aim: 17. To ensure that any contractors used by the PC are aware of their own liability</b>		
<b>Risk</b>	<b>Method used to minimise risk</b>	<b>Person(s) responsible</b>
1. Contractor has an accident whilst working for the PC and does not have insurance	Contractor to be given a clear brief of work to be carried and required to have own public liability insurance (and seen prior to work carried out)	Clerk

<b>Aim: 18. To ensure the parish council can operate its business to the best of its ability during the Coronavirus Pandemic whilst protecting as far as possible it’s members, employee and members of the public.</b>		
<b>Risk</b>	<b>Method used to minimise risk</b>	<b>Person(s) responsible</b>
1. Spreading Coronavirus through direct contact.	Parish Council meetings will be held virtually where public can attend and participate. Annual meetings will not be held in 2020. This is agreed in statute under the Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings)	Clerk and Council

	(England and Wales) Regulations 2020 from 4 <sup>th</sup> April 2020 to 6 <sup>th</sup> May 2021. Correspondence to be signed will be sent via post. Agenda and minutes will be posted online.	
2. Possibility of members/clerk being unable to carry out duties if unwell with Coronavirus.	Parish Council have appointed a deputy chair and deputy clerk if chair or clerk are unwell and unable to carry out their duties. Delegated Authority agreed. If quorum can not be met resolutions can be made by Chair/Deputy and one other parish councillor. Effective from 5 <sup>th</sup> May 2020 to 6 <sup>th</sup> May 2021.	Clerk and Council
3. Direct Payment Authorisation Form can not be approved and authorised by two councillors – as agreed in Standing Orders.	Clerk will email/post copies of the invoices for payment to the parish council before the parish meeting to approve. The Direct Payment Authorisation Form will be signed by two councillors when the Parish Council can safely hold meetings in public again.	Clerk and Council
4. Minutes of previous meeting cannot be signed by Chairman	Minutes will be verbally approved at virtual meeting and signed off by Chairman when it is safe for the Parish Council to hold public meetings.	Clerk and Council
5. Playground inspections are not taking place.	The playground is closed to public as directed by the HM Government on 23 <sup>rd</sup> March 2020 to minimise the spread of Coronavirus. A padlock is on the gate and signage displayed informing closure. This also includes the MUGA and Adult Gym Equipment. Inspections will be reinstated when the playground opens.	Clerk and Council
6. Internal financial check had not been carried during the Coronavirus Pandemic.	The internal auditor reviewed the end of year accounts and confirmed proper book keeping. This included reviewing the accounts which would have been checked as part of internal control. Clerk to send copy of internal auditor's report for evidence to the parish council. Training has been approved for a parish councillor to complete internal financial checks in the future.	Clerk and Council