

RISK ASSESSMENT AND MANAGEMENT REVIEW February 2022

RISK RATING	Severity	Column1	Column2
Likelihood	1	2	3
1	1	2	3
2	2	4	6
3	3	6	9

Area	Risk	LEVEL BEFORE likelihood	LEVEL BEFORE severity	OVERALL RATING	Action to reduce risk to as low as reasonably practicable	LEVEL AFTER likelihood	LEVEL AFTER severity	OVERALL RATING2	2022 updates
Assets	Accidental damage to physical assets - cost of repair and replacement	2	3	6	Building and contents insurance reviewed annually. Value increased annually by inflation. 28/04/14: Council reviewed and approved decision not to insure play equipment. Building insurance values reviewed by qualified surveyor 2016. Subscription Rooms was added 28/3/2019 and a building valuation was completed to establish rebuilding cost as required by insurance company.	1	2	2	RECOMMEND: update insurance valuations on Lansdown Hall and Thanet House
Assets	Insecurity of buildings, equipment etc.	3	2	6	Office and depot alarmed. Equipment kept secure when on site. Business continuity plan adopted 2015. 2021 Intruder alarm at Thanet House connected to monitoring system to provide additional protection when unoccupied.	1	2	2	UPDATE: Intruder alarm system at Thanet House extended to include upper floors. Security company contracted as keyholders for depot and office to provide call out service for alarm activations.
Assets	Inadequate maintenance of buildings	2	2	4	Thanet House re-surveyed in 2011. Urgent work done. Further works carried out in 2013-14; Budget provision made for regular maintenance. Lansdown Hall (under management of working group) closely monitored and repairs carried out as necessary. Sheds,shelters inspected at least annually. Records of maintenance kept on file. Survey of Thanet House commissioned January 2016.	1	1	1	UPDATE: Some maintenance work planned at Thanet House February 2022 - decorating, repairs to fittings in flats.
Assets	Property rights	1	3	3	Dispute with neighbour regarding access for maintenance and license for services at Thanet House potential impact on value and saleability of property. Court action not required.	1	2	2	
Assets	Inadequate maintenance of boundary walls	3	3	9	Walls surveyed in 2017. Significant works required. Tenders for works going out 2018 and Public Works Loan sought to enable work to go ahead. Main works completed and register of walls set up.	1	1	1	UPDATE: Parliament Street wall to be progressed 2022. Rebuild redesigned to minimise disturbance to burial ground.
Assets	Asset transfers	3	3	9	Potential for acquisition of additional financial and legal liabilities in connection with the transfer of assets from other councils. Depending on the type of asset suitable and appropriate advice and reports sought from, for example: structural engineers, health and safety and HR advisors, solicitors, accountants and insurers.	1	2	2	UPDATE: Transfer of the Leazes in progress 2022. Surveys of walls completed and high risk areas excluded from transfer. Solicitor appointed to advice on transfer terms.
Assets	Tenants	3	2	6	Risk of financial failure of tenants of community buildings (Lansdown Hall and the Subscription Rooms) resulting in early termination of leases, reputational risk to Council, and impact on staff capacity. There could be a need to take urgent possession of the properties and ensure their safety and security, which would have cost implications.	3	2	6	UPDATE: COVID-19 continues to place significant financial pressure on community organisations that were impacted by enforced closures and continued impact on sales. Government support many not be enough to keep them solvent. Mitigation: Council staff continuing to maintain close contact with tenants.
Assets	NEW masonry issues at Subscription Rooms	3	3	9	Falling masonry presents significant risk of harm to the public. Structural engineer contracted to provide report and advise on safety measures. High risk areas fenced off with appropriate signage. Specialist construction lawyer appointed to investigate liability for repairs.	1	3	3	UPDATE: Council agreed to fund repairs in the absence of a viable case for legal action. Fencing remains in place.
Data protection	Breach of data protection legislation. (New GDPR legislation May 2018)	3	2	6	Potential fines for breaches of data protection legislation. Deputy Clerk attended training. GDPR policies adopted.	1	2	2	
Finance	Banking failure	1	3	3	Current account banking with Lloyds TSB; Deposit moved to Nationwide after advice. Additional account opened 2016 with PSDF.	1	2	2	UPDATE: interest rates remain very low as a result of the economic downturn arising from the coronavirus pandemic.
Finance	Consequential loss	2	3	6	Insurance cover to provide new working space. Important records in fireproof safe. Minutes from 1990 to 1999 forwarded to County Records. Minutes from 1999 to 2003 have been copied to disc. Back-up system for documents from 2003 to date. Minutes converted to pdf at the end of each year. Business continuity plan adopted 2015	1	3	3	ACTION: Business continuity plan to be reviewed. - outstanding. ACTION: take out Cyber Insurance cover - outstanding
Finance	Loss of cash (fidelity insurance)	1	2	2	Cover at £250,000 reviewed annually. Increased to £1m 2017	1	1	1	
Finance	Dishonesty or errors in financial procedures	1	3	3	Authorisation of payments separated from execution. Purchase Order system. Two cllr signatures on cheques. Transaction limit on debit card use. Quarterly Cllr review of procedures. Independent internal auditor appointed annually. Electronic payments and suitable policies and procedures put in place 2020.	1	2	2	RECOMMEND: make sure internal checks are brought up to date urgently. Limited contact because of COVID-19
Finance	Lack of compliance with Customs and Excise	2	2	4	Included in computer accounting package. Advice of specialised accountant available when needed.	1	1	1	

Finance	Inadequate budgeting pre-precept	2	2	4	Budget setting process approved in advance by Council each year; Finance Committee scrutiny of draft budget followed by final approval at Council. Precept derived from this.	1	1	1	
Finance	Unauthorised borrowing	1	2	2	Previous through PWLB. All loans require authorisation of Council	1	1	1	
Finance	Lack of proper independent internal audit	1	2	2	Annual appointment approved by Council.	1	1	1	
Finance	Loss of accounting records	1	3	3	Off site automatic back-up.	1	2	2	
Finance	Inadequate Standing Orders and Financial Regulations	1	1	1	Regular review by F&P Committee .Financial Regulations reviewed at Council April 2021 to reflect changes to model document.	1	1	1	
Finance	Inadequate monitoring of expenditure	2	3	6	Monthly accounts prepared; reviewed at F&P meetings.	1	2	2	
Finance	Payments not legally compliant	1	2	2	Clerk advises. NALC helpline available	1	1	1	
Finance	Improper use of grants and S137	1	2	2	Clerk advises. NALC helpline available. Power of Competence from 10th Sept 2012. GPC renewed annually.	1	1	1	
Finance	Improper management of investment	1	2	2	Clerk and Financial Administrator decide on amount and maturity of Lloyds TSB Treasury Deposits according to cash requirements. Strategy revised in November 2008 in response to banking crisis. Rolling investment account at NWBS. Authority to transfer funds in an emergency given to Clerk in consultation with specific councillors. Updated investment strategy adopted at Council May 2018. Current investments regularly reported to F&P Committee.	1	1	1	
Finance	Impact of economic downturns on investments	1	3	3	Risk to Council's investment capital of negative interest rates. Clerk to review investments monthly and move funds if necessary in line with Investment Strategy. In 2021 CCLA reported potential for negative interest rates in the wake of the COVID-19 pandemic.	1	2	2	UPDATE: interest rates remain very low but did not slip into negative values.
Finance	Access to Council funds for emergency expenditure	1	3	3	Debit cards issued to Clerk, Deputy Clerk, Green Spaces Manager and Assistant Clerk, with varying expenditure limits to support emergency payments to protect council assets or services, in accordance with Financial Regulations. 2021 agreed to add Community Development Officer.	1	1	1	
Liability	Damage/injury to third party, property or individuals	3	3	9	Retained Health and Safety consultants, fulfilling 'competent person' role. Regular review of risk assessments. H&S review at meeting for all staff annually. Inspection records (trees, play areas, memorials) kept. Christmas light strain and electrical testing annually. Damage/danger reporting protocol for groundstaff. Accident reporting protocol for all staff. RoSPA safety inspections and risk assessments for play areas. Public liability insurance to include volunteers. H&S Working Group established 2016. 2020 Panic alarm installed at Thanet House to enable front of house staff to summon police in an emergency.	2	3	6	
Liability	Compensation to employees	1	3	3	Employer's liability insurance in place.	1	1	1	
Liability	Lack of compliance with employment law	2	2	4	Retained HR consultants and legal support in place.	2	1	2	
Liability	Lack of compliance with HMRC	1	2	2	HMR advice checked through website. Independent internal auditor checks. Advice from NALC accountant when needed	1	1	1	
Liability	Failure to ensure safety of staff and visitors	1	3	3	Fire notices; exits clearly signed; fire risk assessments at recommended intervals; evacuation procedure agreed; fire drills; detection and fire-fighting equipment reviewed annually; other risk assessments under regular review	1	1	1	UPDATE: Fire risk assessment for Thanet House, including flats updated 2021.
Liability	Failure to ensure safety of depot and Ground Staff	2	3	6	H&S risk assessments; Fire risk assessment; Protective clothing. Appropriate equipment and training.	1	2	2	
Legal	Acting outside legal powers	2	3	6	Clerk and Deputy Clerk attends regular training/updates and advices. Advice available from NALC via membership of GAPTC; and SLCC.	1	2	2	
Legal	Inadequate reporting through minutes	1	1	1	Draft minutes produced within two weeks. Circulated to members, media and posted on the website. Approved at next meeting.	1	1	1	
Legal	Inadequate document control	1	2	2	Minutes up to 1999 to be forwarded to County Records. From 1999 to 2003 to be digitally recorded and then originals forwarded to County Records. From 2003 to date to be backed up and stored off site. Deeds and other documents, including burial records, are held in the fireproof safe.	1	1	1	Action: deposit historic burial records with Gloucestershire Archives - outstanding
Legal	Inadequate protection of data	2	3	6	Correspondence filed under 'parishioners'. Burial records updated regularly. Complaints about any matters in complaints file on computer in date order, accessible for purpose of follow up by staff only. Electoral Roll and other names and addresses securely stored with authorised access only. Privacy statement on website. GDPR policies adopted 2018.	1	2	2	
Councillor Propriety	Code of Conduct violations	1	2	2	SDC model Code of Conduct adopted 10/09/12; Copies supplied to all councillors; DPs notified to SDC and available on STC website; declaration of interests is standing item on every agenda. Revised Code of Conduct adopted 2015 and reviewed in 2018. Updated process for handing complaints adopted October 2018 in response to Ledbury case.	1	1	1	

Councillor Propriety	Acceptance of improper gifts and hospitality	1	2	2	Register for hospitality/gifts established. Model policy adopted. Registration of interests standing item on every council meeting agenda.	1	1	1	
Other	Infectious disease (e.g. coronavirus)	1	3	3	Follow NHS advice and provide necessary supplies, e.g. hand sanitiser if required. Systems are in place so that staff are able to work at home where feasible.	1	2	2	UPDATE: COVID-19 risk assessment regularly reviewed in accordance with latest guidance.
Other	Absence of Clerk	2	2	4	Deputy Clerk to undertake role with support of Councillors. Deputy Clerk employed April 2017. 2020 Key Personnel cover added to insurance policy to cover Town Clerk. Capital Sum £100,000 Weekly Sum £500 for up to 10 weeks and £100 per week thereafter. Accident and Assault Cover	1	1	1	
Other	Absence of Green Spaces Manager	2	2	4	Short term (4-6 weeks): A member of the team can 'act up'. Long-term: cover can be provided on contract or using agency staff.	1	1	1	
Other	NEW Staf resources	2	3	6	Staff shortages arising from inability to recruit to fill vacancies. Mismatch between volume of work and staff availability. Both have potential to impact on ability and capacity to keep on top of risk areas.	1	2	2	UPDATE: Strategy and Action plan review in progress, prioritising project work and reducing workload pressure. Additional staffing budgets approved for 2022-23.
Other	This document becomes out of date	1	2	2	Review annually at Council or in response to any significant changes, for example the acquisition of new assets or taking on new services.	1	1	1	ACTION Review at F&P 14/2/2022, and recommend to Council 7/3/2022

Review dates

28/04/2014
02/03/2015
01/02/2016
30/01/2017
07/02/2018
18/03/2019
16/03/2020
22/03/2021
14/02/2022