



Fakenham Town Council

Fakenham Connect, Oak Street, Fakenham, Norfolk. NR21 9DY

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Town Clerk: Linda Jennings

RISK MANAGEMENT POLICY

**A copy of this Guide is kept in the Town Council Offices
at the Connect Building**

Good governance, accountability and transparency are essential to local councils. Those who are responsible for the conduct of public business and for spending public money must ensure that everything is conducted in accordance with the law and proper practices. As with all management systems the risk management policy should be monitored and reviewed to ensure that all risks are identified, controls are implemented and that they remain effective.

The Audit Commission Act 1998 and the Accounts and Audit Regulations issued from time to time under the Act, set out how we should act when accounting for public funds. This includes an annual review of the effectiveness of the system of internal control and also a formal financial risk assessment. This is part of the Annual Return, as identified in Section 2 part 5 of the Statement of Assurance, which is made to the External Auditor and will be inspected by the independent Internal Auditor. The Policy is intended as a working document for the Internal Auditor, Councillors and Town Council employees, and will assist elected members in their approval of the Statement of Assurance.

Risk Management helps achieve the objectives of the organisation to manage risks effectively and to deliver high quality public services. Risk management is ultimately the responsibility of all members, and those risks should be identified, consequences evaluated and decisions made to include appropriate measures to avoid, reduce and control the risks and consequences. Councillors have a duty to make themselves familiar with the requirements contained in the Audit Regulations, as they are legally responsible as the elected members.

Source: *Governance and Accountability in Local Councils in England and Wales*

Dated 6th April 2021

Updated and Ratified at Full Council; 20th April 2021

1 IDENTIFYING THE AREAS OF ACTIVITIES UNDER OUR MANAGEMENT

Council Offices, Connect Building, Oak Street, Fakenham

The Council is a tenant in this building, which is owned and managed by NNDC. One of our main functions is to organise meetings for our members and the public, and deal with matters arising from those meetings. We also have financial responsibility and a managerial responsibility - managing allotments, cemeteries and open space areas, arranging site visits. We also report problems on behalf of the public for services provided by other tiers of government

Queen's Road Cemetery and Chapel

A town centre Cemetery, where burials can still take place, in the Garden Plot. The Cemetery is open at all times except when necessary to prevent misuse.

St Peter's Garden

We maintain this garden, near to the Parish Church. Interment of ashes still takes place here in a restricted area managed by the Parish Church, not the Council.

Creake Road Cemetery

An out-of-town site, with archway entrance, brick storage buildings and wall to either side of the entrance. This is the site currently used for burials. The site is open at all times. We arrange matters concerning burial plots and memorials as well as the maintenance of the site. Maintenance of the site is arranged through a contractor. Funeral Directors prepare burial plots and reinstate areas after burial.

Peckover Cemetery

Town Centre Cemetery with wall surrounds and mature evergreen oak trees, adjacent to the Aldiss Superstore. The site is available for future Quaker burials.

Allotment sites

- (1) Rudham Stile Lane (some plots available).
- (2) Greenway Lane (some plots available).
- (3) Grove Lane (some plots available).

Playing Fields

- (1) Hayes Lane. Wooden play equipment is sited on a large area of open space; there is also play and fitness equipment. The entrance is from Hayes Lane.
- (2) Whitelands. Play Equipment on a large grassed area.
- (3) Millennium Park. Has play equipment, including a cable rider and skate park. There is a large area of grassland and a landscaped garden area (Managed by the Town Council as the Trustees of the Fakenham Recreation Ground Charity).
- (4) Trap Lane Field (for sports), Pavilion, Depot and Storage Container.

Other Open Spaces sites

- 1 Railway Cutting
- 2 Trap Lane Field
- 3 Goggs' Mill Picnic Area

Goggs' Meadow, Edmondson's Acres and Bacon's Piece are now leased to the Hawk & Owl Trust.

Street Lights

Street Lights (365) owned and maintained in the town. Our Contractor is K & M Street Lighting Services. We report faulty lights, vandalism and impact damage to K & M Street Lighting Services.

Finance to check invoices annually against the latest Certificate to verify and ensure monthly charges are correct where necessary. The Certificate will be requested from UK Power Networks where any changes are made to the street lighting.

Market Management

Managing the Market. We manage stallholders' sites and collect market tolls. The Market cleaning is managed by the Traders who are now paying by Cheque or Direct Debit.

Market Tolls

Local organisations can apply to the Market Tolls for funding for new projects, social activities, and other events. Cllrs. decide whether the criteria have been met, before awarding grants.

Provide and maintain street furniture

The Town Council has benches in various locations in the town. These are inspected and repaired regularly. The Council has been gifted a concrete seat which is on Goggs' Picnic Area. It also maintains the Edward VII Coronation Lamp, the Fakenham Town Sign, the War Memorial Bus Shelters, Heritage Trail maps tables and plaques and the Library Triangle equipment.

Street Collecting Licences (Delegated task from NNDC)

2 ABOUT THE PERSONNEL INVOLVED

Town Clerk, Deputy Town Clerk and 1.5 outdoor staff members are employed and there is also the contracted finance team. The Clerk/Deputy Town Clerk collects the Market Tolls from the Thursday Charter Market. The Town Council Office is open from 10am to 2pm Monday to Friday to deal with queries from the public. Risk assessments have been carried out for activities undertaken in the office. (Refer Appendices). Risk assessments have been carried out for work undertaken by outside staff members also Councillors and the general public when attending the Council offices. (refer appendices).

3 DETAIL OF ACTIVITIES UNDERTAKEN

Council Offices, Connect Centre, Oak Street Fakenham

The main Connect Centre office is open to the public from 9.00am until 2.00pm Monday, Tuesday and Thursday, 10am to 5pm Wednesday and 9am to 4.30pm Friday. The front desk is closed from 12.30pm–1.30pm for lunch. The front desk staff may occasionally direct visitors to the Town Council office. The door to the Town Council office is open to the public from 10.00am to 2pm Monday to Friday. To enable staff to have dedicated administration time, Councillor enquiries or visits to the Office should also be kept within Office open hours' time frame. Enquiries outside 10am to 2pm should be made by email to which Office staff will respond as soon as they are able.

IN THE EVENT OF AN EMERGENCY SITUATION OR SPECIAL CIRCUMSTANCES

OFFICE MANAGEMENT

The Town Council office may be closed or have restricted opening hours. Staff cover at the Connect office may be limited to essential visits only with personnel working remotely where this is recommended. During such periods, information would be posted to notice boards and the web site and a dedicated message left on the answer-phone advising callers how to proceed with their enquiry. Answer-phone messages would be accessed and managed from a remote phone.

FINANCE MANAGEMENT

With the appropriate equipment – lap top, compatible IT and RBS system live set up, measures may also be taken for essential accounting processes and financial management to be serviced remotely, or in an alternative room within Connect.

On a temporary basis, the attendance of finance personnel at the office may also be relocated to Friday afternoons when the sharing of staff office space and equipment is avoided. The exchange of information between office and finance personnel regarding accounts related matters is addressed by phone or email.

Routine direct debit/standing order payments identified from bank statements are set up and authorised remotely by signatories when necessary. For other expenditure, invoices are scanned to signatories for authorisation and on-line payment by BACS.

In the event of any circumstances when no staff are available – a key is kept in the safe to which the Chairman and Deputy Chairman have access.

Daily cleaning services are provided by NNDC and the cost of this is included in the service charge. Outside of the public hours the door into the Town Council office is locked. Outside of office staff working time the door into the store cupboard is also locked. In the store cupboard there is a locked metal fire-proof storage cabinet, containing Minute Books and Burial Books and a storage cupboard situated in the Marriage/Committee Room is also locked, the Councils' chairs, tables, pictures and other memorabilia are stored in here, under an agreement made with Fakenham Connect in 2000.

Creake Road, Queen's Road Cemetery and Chapel and Peckover Cemetery

Funeral Directors prepare the Graves. Graves are prepared only after confirmation from the office that this is possible i.e. in terms of time and location of the plot. Memorials are inspected every five years and are recorded. Creake Road Cemetery is open at all times; Queen's Road Cemetery is open at all times and Peckover cemetery is locked. There are Rules and Regulations in both the Creake and Queen's Road cemeteries concerning burials and interments, memorials and general use of the site. The Rules and Regulations are posted on a notice board in the cemetery. Funeral Directors and Memorial Masons are informed of the Rules and Regulations. The Rules and Regulations are reviewed annually.

Allotment sites

- (1) Rudham Stile Lane (some plots available)
- (2) Greenway Lane (some plots available)
- (3) Grove Lane Site (some plots available)

Rents are reviewed annually and rent increases are notified to the tenants 12 months in advance. Rents are due on 11th October annually (Michaelmas)

Office staff manage the sites. Rudham Stile Lane has two Tenant Representatives, Greenway Lane and Grove Lane sites have one. Tenancy agreements are signed and Tenants are given a copy of the Rules. Council staff carry out regular inspections of the sites.

Playing Fields

- (1) Hayes Lane - Trim Trail, outdoor gym equipment and play equipment on a large area of open space.

- (2) Whitelands. Infant swings, Twin Forest Tower, See-Saw and a Slide with a public path through the site.
- (3) Millennium Park - Includes play equipment, skate park, a cable rider and outdoor gym equipment. (Charity managed by the Town Council and Councillors are Trustees)
- (4) Trap Lane Pavilion, Depot, and storage container.

Town Council staff inspect each site weekly, and there is a formal RoSPA inspection each year. Problems are reported to the Town Clerk who organises repairs and replacements as required. Weekly Inspection sheets are maintained and a log of repairs kept.

Other Open Spaces sites

Goggs' Mill Picnic Area
Railway cutting
Trap Lane Field
Aldiss Park

Inspection of these areas is limited to that provided by the maintenance contractor before cutting of the site. A tender document is prepared every third year for the contract grass cutting of all the above areas (except the Railway Cutting).

Litter picking on all of the Council's land is undertaken by the Council's own maintenance staff.

Provide and maintain street furniture

The Town Council has benches in various locations in the town. These are inspected and repaired regularly. The Council has been gifted a concrete seat which is on Goggs' Picnic Area. It also maintains the Edward VII Coronation Lamp, the Town Sign, the War Memorial, the Bus Shelters, Heritage Trail map tables and plaques and the Library Triangle furniture.

Street Lights

Street Lights owned and maintained in the town.

Reports of faulty lights are given to the Contractor K & M Street Lighting Services. The Contractor is advised that only reports of faulty lights made by the office are to be repaired. A tender document is prepared every third year for the maintenance contract of the lights. K & M Street Lighting Services undertakes an annual inspection of each light.

The unmetered Supply Certificate from UK Power Network should be checked by Finance team against electricity invoices to confirm estimated usage charges are correct when any changes occur.

Market Management

Since 1 January 2011, the Charter Market Stallholders take their waste away. The Groundsman checks for any litter at the end of the day. No cash payments are permitted. All rents now paid via direct banking.

Street Collecting Licences

(Delegated task from NNDC)

No financial support is offered for undertaking this task.

4. SEVERE WEATHER POLICY

1. Introduction

1.1 This policy defines the way in which the Town Council approaches severe weather conditions.

2. General Statement

2.1 Severe weather is defined as extreme high winds, flooding, heavy snow and icy conditions, or heat waves. The policy applies to Town Council owned or managed land, individual landowners are responsible for dealing with their own property and Norfolk County Council are responsible for highways, pavements, schools etc.

3. Responsibilities

3.1 Town Clerk

The Town Clerk must identify and prioritise where action is required and allocate the Council's resources as effectively as possible.

3.2 Councillors

Councillors must ensure sufficient resources are allocated to deal with severe weather conditions. They must recognise that employees may have difficulties in travelling to and from work and the effect on their starting and finishing times.

4. Procedure

4.1 The Groundsman will deal with the physical issues arising from severe weather and will be adequately trained to undertake remedial actions required.

4.2 The Groundsman and The Clerk will review if it is safe to cut down any small trees and branches in high winds, otherwise a Contractor will be sought. The Groundsman will spread grit on footpaths around the Town as required and will also grit the Market Place especially if Market Day will be affected.

The public can clear snow and ice from pavements. It is unlikely they will be sued or held responsible if someone is injured on a path or pavement if it has been cleared carefully.

How to clear snow and ice

To clear snow and ice:

- do it early in the day - it's easier to move fresh, loose snow
- don't use water - it might refreeze and turn to black ice
- use salt if possible - it will melt the ice or snow and stop it from refreezing overnight (but don't use the salt from salting bins as this is used to keep roads clear)
- ash and sand can be used if there is not enough salt - it will provide grip underfoot
- pay extra attention when clearing steps and steep pathways - using more salt may help

4.3 Staff who live in Fakenham and can walk safely to work will ensure that the Town Council office is open for business. The hours of work may have to be reviewed depending on the severity of the weather conditions.

4.4 Those staff unable to attend work must take the time off as either annual leave or as unpaid leave. If possible they can work from home.

4.5 Town Councillors may be asked to assist staff at the office or depot depending on the severity of the weather.

4.6 Staff may be required to work out of hours depending on the severity of the weather to ensure services are maintained.

5. Actions

5.1 Town Clerk

The Town Clerk will identify and undertake the following actions, including out of hours:

Assess the risk regarding severe weather and the impact this will have by obtaining information from the Meteorological Office, The Environment Agency and Norfolk County Council's website. The Chairman or Deputy Chairman will assist the Town Clerk with assessing the risk of severe weather.

5.2 High winds – winds above force 9 are defined as high winds.

5.2.1 Flooding – flood warnings will be monitored. The Environment Agency may be contacted to advise the Town Council.

5.2.2 Snow and ice – weather warnings will be monitored.

5.3 Inform Councillors and staff of the current situation regarding the severe weather. Ensure the Town Council office remains open if possible. If staff cannot travel to work, Councillors will be asked to make themselves available to assist with continuity of services.

5.3.3 In the absence of the Clerk or Deputy Clerk a key will be kept in a key safe to which the Chairman and Vice Chairman will have access.

- 5.4** The Council will endeavour to keep the website continually updated if the appropriate staff are able to attend work during normal office hours Monday – Friday.
- 5.5** The Grounds-men will be asked to undertake the following activities depending on weather conditions and associated risks:
- a) High winds – following periods of high wind, the following sites will be visually inspected for damage:
 - Goggs Mill.
 - Peckover Cemetery, Creake Road and Queens Road Cemeteries.
 - Aldiss Park.
 - Millennium Park.
 - Railway Cutting
 - Trap Lane Field, Depot and Pavilion.
 - Greenway Lane, Grove Lane, Rudham Stile Lane Allotment sites.
 - b) Flooding – during and following periods of flooding any damage will be reported and any debris removed.
 - c) Heavy snow and ice – gritting will take place as detailed in 4.2. The stock of grit/salt held by the Town Council will be checked annually in September by the Groundsman. Any additional supplies will be ordered by the Clerk.
 - d) Heat Waves – work patterns and tasks may be altered to avoid outside work during heatwaves. This is for staff safety.
 - e) Equipment, signs, personal protective equipment and materials will be checked at least every six months, prior to use, after severe weather and in preparation for it.
 - f) In extreme weather conditions where transport is difficult or dangerous it may not be possible to treat/inspect Town Council owned land as staff may have difficulty in reaching some sites
 - g) Town Council staff will endeavour to pass on reports about severe weather problems outside of the scope of this Policy to the appropriate body, i.e. North Norfolk District Council and Norfolk County Council.

5 RISK IDENTIFICATION

The current Insurance Provider is:

BHIB Leicester, AGM House, 3 Barton Close, Grove Park, Enderby, Leicester, LE19 1SJ

Tel: 0330 013 0036

e-mail: enquiries@bhibaffinities.co.uk

The policy renewal date is 1 January 2022

Policy Number: LC/FAKE/28119-6Y9U

The Insurance Policy is reviewed annually. There is a public liability cover of £5 million. The National Association of Local Councils recommends this amount. There is also Employer's Liability, Fidelity Guarantee and vehicle insurance. Employers Liability certificates are displayed and retained in the cupboard

5.1 Protection of Physical Assets owned by the Council (refer Assets Register)

5.1.1 Material Damage:

Most of the Property and Furniture identified in the Assets Register is insured.

Gates and Walls identified in the Assets Register are insured against impact/vandalism only

Office Contents – all risks

Street Lights are insured

Internal Controls:

- Valuations of the above items are detailed in the Fixed Assets Register. This is increased each year and is index linked within the Insurance Policy.
- Our Insurers recommend that buildings should have a professional valuation once every five years.
- The Town Clerk updates the Insurance Policy as the year progresses and checks this against the revised Policy, which is received near the renewal date (January).
- Grounds maintenance is carried out by an appointed contractor and the Town Council's Groundsmen.
- Portable electrical equipment is tested every year.
- The Town Council is asked to review its insurance policy each year to ensure all items are included in the policy.

Insurance cover for risk is the most common approach to certain types of inherent risks; refer to the Fixed Asset Register.

5.2 Risk of Damage to a Third Party or individuals as a consequence of the Council providing services or amenities to the public. (Refer Appendices)

The above are identified as: Street lights / cemetery /bus shelters / benches / notice-boards /equipment on open spaces/charter market, Heritage Trail map tables and plaques and Library Triangle furniture.

Internal Controls:

- Annual inspection of all streetlights by the approved Contractor. This is currently K & M Street Lighting Services Ltd Tel 01480 395806. Reporting of street lighting problems is undertaken by Town Council Staff. A light is either the responsibility of the Town Council, Norfolk County Council,

North Norfolk District Council, or in some cases Victory Housing. Specific details are requested from people reporting faulty lights, and passed to the contractor. Most repairs fall within the maintenance contract terms covered by the monthly contract payment. Invoices presented by the contractor for additional non-routine repairs or replacements are verified with the street lighting inventory and the Council's original damages report to the contractor.

- The Town Clerk and the Town Council's outside staff members undertake annual inspections of street furniture and Cemeteries.
- Grave digging is arranged by Funeral Directors, who undertake risk assessments. Grave digging must be authorised by the Town Council, in the plot allocated. Installation of Memorials must be undertaken by authorised masons on the allocated plot.
- The Town Council operates the cemetery with a comprehensive list of rules and regulations, which are updated regularly. They are issued to all local Funeral Directors and Memorial Masons.
- Council staff undertakes a weekly inspection of the Playing Fields, play equipment and Open Space areas.

5.3 Risk of consequential loss of income or the need to provide essential services following critical damage, loss or non-performance by a third party (consequential loss).

The sources of income to the Council are limited, as its chargeable services are very limited. Its main source of income is the precept. Essential services are provided by other tiers of government.

5.4 Loss of cash through theft or dishonesty (fidelity guarantee)

Internal Controls:

- There is currently a fidelity guarantee of £250,000, covered by Insurance. This is reviewed annually on advice from the Internal Auditor.
- Loss of Cash in transit or on the premises at the Connect Centre is covered by insurance.
- Loss or theft of miscellaneous cash receipts. (Refer Appendix)
- Loss or theft of stamps and stationery (refer Appendix)

5.5 Legal liability as a consequence of asset ownership (public liability)

Internal Controls:

- Limit of Indemnity £10,000,000. This is reviewed annually and/or upon advice from National Association of Local Councils (NALC) or The Society of Local Council Clerks (SLCC).

5.6 Employers Liability and Personal Accident

The Town Council employs four members of staff, the Town Clerk (full-time), and Deputy Town Clerk (part-time), one full-time outside staff and one part-time outside staff.

Internal Controls:

- Limit of Indemnity £10,000,000. This is reviewed annually and /or upon advice from NALC or the SLCC. Certificates of Employers Liability are retained for 40 years, and the current certificate is displayed.
- There is insurance in place for personal accident to cover employees, councillors and contracted staff.
- The finance team is contracted and may be working on the premises one or two afternoons per week.

5.7 Libel and Slander

Internal Controls:

- Sum Insured £10,000,000. This is reviewed annually and upon advice from NALC or the SLCC
- Ensuring the robustness of insurance providers by reference to NALC and the SLCC
- Annual review of the Policy and its content
- Tri-annual review of Insurance providers (next due December 2022)
- Notification of all potential claims, without delay to the Insurers
- Maintenance of filing systems (ref Insurance) and an annual review of those systems
- Training to members and officers

6 MANAGEMENT OF RISKS THROUGH A THIRD PARTY

RISK IDENTIFICATION

- 6.1** The Town Council will buy in services from specialist external bodies, or professional accountancy, legal and digital services.
- 6.2** The Town Council will also take the advice of specialist external bodies, whether statutory or non-statutory.
- 6.3** The Town Council will issue formal tenders for goods and services in excess of £25,000, obtain three quotations between £25,000 and £5,000 and three estimates between £5,000 and £500. A Procurement Protocol also provides guidance on the standardised process of securing quotations for goods and services.
- 6.4** Service interruption due to long-term absence of the Town Clerk and Deputy Town Clerk. – covered by Insurance.

- 6.5** Service interruption of damages occurring whilst Contractor working on property or equipment on behalf of the Town Council.
Potential risks should be assessed and declared. Both party liabilities should be made clear prior to commencement of works.

Internal Controls:

- Included in Contract Terms agreed, service contractors should clarify their policy in respect of liabilities where equipment repair or replacement may be necessary following a service intervention.
- Any Buyer Beware warning should be evident and clarified on each occasion before commissioned works proceed.

Internals Controls:

- Standing Orders, Financial Regulations and the Procurement Protocol dealing with the award of contracts for services and the purchase of capital equipment, are reviewed every year.
- Regular reports are made to council on the performance of suppliers / contractors.
- There are regular monthly finance reports and quarterly budgetary reports to council, following the monthly Finance sub-committee meeting
- There is an independent internal control management (member of the Finance sub-committee) arrangement for the detection and deterrence of fraud, corruption and to ensure the routine financial maintenance of the council's affairs prescribed by the Audit Regulations. There is also both an internal and external auditor.
- The exercise of Council's legal powers and functions are recorded in meeting minutes
- Tender documents are drawn up when required

7 SELF-MANAGEMENT OF RISKS

RISK IDENTIFICATION

7.1 Ensuring that all requirements are met under Employment Law and Inland Revenue Regulations

Internal Controls:

- Issuing of Contracts of Employment, annual staff appraisals and job description reviews.
- Completion of time sheets
- Maintenance of Personnel files
- Defined channels for addressing concerns for staff, councillors and members of the public. Complaints Policy and Grievance and Disciplinary Policies are in place.

- The council maintains an adequate budgetary provision for the training of staff and councillors.

Refer FRA8

7.2 Ensuring all financial records are kept in accordance with statutory requirements

Internal Controls:

- Standing orders and financial regulations are reviewed every year.
- Control procedures were updated in 2016 at the Governance Review. The Internal Controller (a member of the Finance Sub-Committee carries out independent monthly checks.
- Provision of independent internal audit as required by the Code of Audit Practice (Updated October 2019).
- Monthly bank reconciliations of the Council bank accounts are sent to Councillors, reviewed in council after detailed scrutiny by the Finance sub-committee.
- Insurance Policy is agreed and reviewed by the council

7.3 Ensuring all business activities are within legal powers, ensuring compliance with borrowing restrictions, and ensuring all requirements are met under Customs & Excise.

Internal Controls:

- Standing Orders
- Financial Regulations
- Investment Strategy Policy
- Annual internal and external audit

7.4 Ensuring the adequacy of the annual precept and within sound budgeting arrangements.

Internal Controls:

- Full Council approval of Budget (by January)
- Regular quarterly reporting of budgetary matters to Council
- Proper, timely and accurate reporting of Council business in the minutes to include full details on all items of expenditure.
- Project Receipts and Payments drawn up for special activities to identify overall costs and possible losses for consideration by members. (i.e. project financial risk assessments)
- Annual review of contingency reserves.
- Regular systems review by Internal Controller.

7.5 Ensuring Complaints and Enquiries from the public are adequately addressed.

Internal Controls:

- Defined complaints policy, reviewed annually
- Defined enquiries procedure and where ever possible acknowledgements to enquiries are made within 7 days with full responses within 14 days.

7.6 Proper document control.**Internal controls:**

- Provision and maintenance of indexed filing system
- Maintenance of records as required for audit and insurance purposes
- Maintenance of a minute book, which is properly numbered, paginated and signed with a master copy for safekeeping.
- Monthly update of cemetery books and records, with a master copy for safe keeping
- Procedures for dealing with and monitoring grants or loans, and report to the Town Council. (Grant Application Form)
- Meeting the laid down times for responding to consultation invitation. When this cannot be appropriately done, the date of response will be advised to the issuing body.
- Back up system for information in the event of theft or fire at the Connect Centre (refer Appendix 5)
- Systems and records security covered by Cloud storage
- Cyber security provision -
The current Cyber Insurance Provider is:
BHIB Leicester, AGM House, 3 Barton Close, Grove Park, Enderby, Leicester, LE19 1SJ
Tel: 0330 013 0036
e-mail: enquiries@hibaffinities.co.uk
Renewal date is 1 January annually.
Policy Ref No: 5677549
- A privacy statement is displayed on the website and appropriate correspondence to ensure best practise from Officers and Members.
- The Council is the Data Controller
- The Clerk and Deputy Clerk are the Data Processors
- Council will maintain contact details of professional Data Protection Officers, available when needed.
- An information audit will be reviewed annually.
- Oversight will be managed by Policy & Resources - Data Protection Sub Committee consisting of 3 fully trained members

7.7 Register of Members Interests, and gifts and hospitality in place, complete, accurate and up to date.

Internal Controls:

- Annual Review (May) of Members Interests, maintained in filing system with a copy sent to the Monitoring Officer. Members are asked to keep these up to date.
- Signed Adoption of Code of Conduct for all members, maintained in filing system.
- Recording in the Minutes.
- Separate file maintained for Declarations of Interest: i) by member, and ii) by meeting.

7.8 Ensuring the proper use of funds granted to local community bodies under specific powers, under Section 137 or Market Tolls.**Internal Controls:**

- Grants considered through formal application process
- Detailing the above items in the minutes
- Information required to verify bank account details, the community project and the use of those funds.

The Risk Management Policy was approved and adopted by the Full Council

20th April 2021.

Additional Paragraph 6.5 ratified at Full Council 21st September 2021.