



Fakenham Town Council

Fakenham Connect
Oak Street
Fakenham
Norfolk
NR21 9DY
Tel: 01328 853653

e-mail: info@fakenhamtowncouncil.gov.uk
website: fakenhamtowncouncil.gov.uk

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.

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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, 27th September 2023

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 by Norfolk County Council, leased, and managed by NNDC. One of Fakenham Town Council's (FTC) main functions is to organise meetings for its members and the public, and deal with matters arising from those meetings. FTC also has financial, managerial and administrative responsibilities - managing allotments, cemeteries and open space areas, arranging site visits. FTC also reports 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 Churchyard and Memorial Garden

FTC maintains these areas. Interment of ashes still takes place in the restricted memorial garden 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. FTC arranges 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, Keep Fit equipment and a skate park. There is a large area of grassland and a landscaped

garden area. The park is managed by the Town Council as Trustee of the Fakenham Recreation Ground Charity.

- (4) Trap Lane Field (an open sports area with free public access), a Pavilion, Depot and Storage Container.

Other Open Spaces sites

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

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

Street Lights

Street Lights (**359**) in the town, are owned and maintained by FTC through contracted services. Faulty lights, vandalism and impact damage is reported to K & M Street Lighting Services. The contractor provides Street Lighting stock amendments to UK Power Networks who have oversight of lights system and records.

FTC annually requests confirmation of any stock changes.

Certification is provided by UKPN and passed to the utilities provider to enable adjustments to billing data for the subsequent year.

Electricity invoices then checked by Finance to verify monthly charges.

Market Management

Managing the Market. The Town Clerk supervises the market and stallholders' sites. The Market cleaning is managed by the Traders and rents are now paid by bank transfer or standing order.

Market Tolls

Local organisations can apply to the Market Tolls for funding for new community projects, social activities, and other events. Grant applications are assessed and considered by Councillors at a Development and Market meeting before grants are awarded.

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

A delegated task from NNDC for the purpose of managing charity/ community fund raising activities in the town centre.

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

FINANCE MANAGEMENT

With the appropriate equipment – laptop, 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.

In line with Credit Control policy, a regular payments' run occurs twice monthly. Payments by direct debit/standing order are identified from bank statements. Other expenditure payments are processed by BACS. Invoices for all payments are scanned, payments set up on-line requiring authorization by two signatories, excluding anyone involved in the procurement process.

Daily cleaning services are provided by NNDC and the cost of this is included in the service charge. Outside of the public hours 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. A further storage cupboard situated in the Marriage/Committee Room is also locked. The Councils' chairs, tables, pictures and other memorabilia are stored there, 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 except when necessary to prevent misuse 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 and take responsibility for communicating these to clients. 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 (After old Michaelmas day)

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, managed by the Town Council as Trustees of FRGC.
- (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 managed by the groundsmen and Town Clerk. 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 the Council's land is undertaken by the Council's own grounds 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

A delegated task from NNDC for the purpose of managing charity/ community fund raising activities in the town centre.

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

4.2 The groundsmen 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 groundsmen 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 Vice 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 groundsmen 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.
- Hayes Lane Playing Field
- Whitelands Park

- St Peters Churchyard and Memorial Garden
- 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 groundsmen. 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@hibaffinities.co.uk

The policy renewal date is 1 January

Policy Number: LCO01802

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.
- Insurers recommend that buildings should have a professional valuation once every three 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 Council's groundsmen.
- Portable electrical equipment is tested every year.
- The Council reviews 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 / cemeteries /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 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 by office staff, with the street lighting inventory and the Council's original damages report to the contractor.
- The Town Clerk and the groundsmen undertake annual inspections of street furniture and cemeteries.
- Grave digging is arranged by the 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 undertake 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 and its chargeable services are very limited. The main source of income is the precept. Charter Market rents which fluctuate and are not guaranteed provide funding for Market Tolls community grants. 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 and covers:
- Loss of Cash in transit or on the premises at the Connect Centre
- Loss or theft of miscellaneous cash receipts.
- Loss or theft of stamps and stationery

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 to cover:
- Personal accident for employees, councillors and contracted staff.
- Auditors and finance related personnel who may be working on the premises occasionally.

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
- Triennial review of insurance providers
- 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 external specialists, professional accountancy, legal and digital services.
- 6.2** The Town Council will also take the advice of independent specialists, 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 and/or temporary staff arrangements.
- 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 contracts should clarify policy in respect of liabilities where equipment repair or replacement may be necessary following a service intervention.
- Buyer Beware warnings should be clarified on each occasion before commissioned works proceed.

Internal 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 an internal and external auditor.

- The exercise of Council's legal powers and functions are recorded in meeting minutes resolutions.
- 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.
- Financial Risk Assessment 8 references further control measures.

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 LGA 1972 s151 and the Code of Audit Practice (updated April 2020).
- Monthly finance reports and bank reconciliations are circulated and 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
- Financial Risk Assessments 6 & 7 refer
- 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 Annual Budget (by January)
- Regular quarterly budget versus actuals reporting to Finance Committee and Full Council
- Proper, timely and accurate reporting of council business in the minutes to include full details on all items of expenditure.
- Cost control reports in respect of ad hoc projects for review by Finance Committee and Full Council.
- 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:

- The complaints policy, reviewed annually.
- The enquiries procedure advises acknowledgements 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 the processing and monitoring of grants or loans, and reports to the Town Council.
- Meeting consultation invitation deadlines or responding to the contrary.
- Back up system for information in the event of theft or fire at the Connect Centre.
- 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@bhibaffinities.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 practice from officers and members.
- The Council is the Data Controller
- The Clerk and Deputy Clerk are the Data Processors
- Council maintains contact details of professional Data Protection Officers, available when needed.
- An information audit is reviewed annually.
- Oversight is 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.
- Recorded 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 applications are considered by Council through formal application process in accordance with the Charter Market Deed of Trust or prevailing S137 legislation.
- Details of the above are recorded in the minutes of the meeting.
- 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.

Revisions ratified by Full Council 27th September 2023

