



Keighley Town Council

Risk Assessment Policy

APPENDICES

- Appendix A Corporate Risk Assessment
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KEIGHLEY TOWN COUNCIL RISK MANAGEMENT AND RISK ASSESSMENT POLICY 2020-21

Keighley Town Council is committed to identifying and managing risks, using the following procedures, and to ensuring that risks are maintained at an acceptable level. Any action that is felt necessary will be taken by Keighley Town Council.

The Clerk and Finance & Audit and Policy & Governance Committee's will review risks on a regular basis, including any newly identified risks, and will report back to the full town council. The review will include identification of any unacceptable levels of risk.

The Local Council's Government and Accountability Guidance highlight the following observations regarding risk management.

- Risk management is not just about financial management; it is about setting objectives and achieving them in order to deliver high quality public services.
- The new approach places emphasis on local councils strengthening their own corporate governance arrangements, improving their stewardship of public funds and providing assurance to taxpayers. It makes the point that Members are ultimately responsible for risk management because risk threatens the achievement of policy objectives. Members should, therefore
- Take steps to identify key risks facing the Council
- Evaluate the potential consequences to the Council if an event identified as a risk takes place
- Decide upon appropriate measures to avoid, reduce or control the risk or its consequences
- To identify the risks facing a Council, the Guidance recommends beginning by grouping the three main types of decisions that have to be taken
- Areas where there may be scope to use insurance to help manage risk (Section A)
- Areas where there may be scope to work with others to help manage risk (Section B)
- Areas where there may be need for self-managed risk (Section C)

APPENDIX A

Keighley Town Council
Risk assessment rating criteria

LIKELIHOOD	Highly probable 76-99%	4				
	Probable 51-75%	3				
	Possible 26-50%	2				
	Unlikely 1-25%	1				
			1	2	3	4
			Minor	Moderate	Serious	Major
			SEVERITY			
FINANCIAL IMPACT and/or REPUTATIONAL IMPACT and/or HEALTH & SAFETY IMPACT			Loss of up to £1000	Loss of up to £10,000	Loss of up to £50,000	Loss of over £50,000
			Minimal / localised damage to reputation	Damage to reputation within the town	Damage to reputation within the region.	National damage to reputation; intervention by Government
			No health and safety impact	Minor injury, possibly requiring treatment by health care professional	Serious injuries	Fatality or life-changing injuries

Keighley Town Council

Risk appetite and approaches to managing risk

LIKELIHOOD	Highly probable 76-99%	4		TREAT (take action to reduce risk exposure by introducing measures / controls)		TERMINATE (ie stop the activity that generates the risk)
	Probable 51-75%	3				
	Possible 26-50%	2				
	Unlikely 1-25%	1	TOLERATE (an informed view reached that the risk is accepted)			TRANSFER (usually via insurance or other contractual arrangement)
			1	2	3	4
			Minor	Moderate	Serious	Major
SEVERITY						

Risks rated as **GREEN** are within the risk appetite of the Council. It is unlikely that further additional measures are required to control these risks. These risks may be *tolerated* by the Council.

Risks rated as **AMBER** are within the risk appetite of the Council, however further additional measures may be needed to *treat* (i.e. control) the risks and so reduce exposure OR to consider risk *transfer* e.g. via insurance, franchising or other contractual arrangement. The Council must be periodically advised of amber risks and the action planned and/or taken to control them.

Risks rated as **RED** go beyond the risk appetite of the Council. Immediate action is required to bring the risk within the Council's risk appetite or, if this is not possible or desired, to *terminate* the activity that creates the risk. The Council must be immediately advised of red risks and regularly updated on the action planned and taken to control them until they are within the risk appetite of the Council. *Any action taken must be in accordance with the Council's Standing Orders and Financial Regulations.*

Keighley Town Council
CORPORATE RISK ASSESSMENT, December 2020

SECTION A Areas where there may be scope to use insurance to manage risk

	Severity	Likelihood	Risk rating	Controls in place	Additional controls required	Timeframe	Responsible officer
Protection of physical assets, e.g. Buildings, furniture. vehicles and equipment	1	2		<p>All physical assets are insured with Came & Company via Axa Insurance Policy Number: RGBDX6962034. The current policy was signed in June 2020 and a premium agreed for a 3-year period.</p> <p>Council Vehicle has comprehensive insurance policy with Came & Company Policy Number: AGRI/103849/2021. Renewed in February 2021.</p>	Insurance cover is reviewed on an annual basis to ensure it reflects the Town Council's needs	Annual	TC/ RFO
Risk of damage to third party property or individuals as the result of the council providing services or amenities to the public	2	2		<p>Keighley Town Council has public liability insurance of £10,000,000 for any one event products liability insurance of £10,000,000 of any one period of insurance. Policy Number RGBDX6962034</p> <p>Additional Risk Assessments for specific events and strands of work are in place. For example, event risk assessments.</p>		Annual	TC/ ATC/ CDO
Risk of damage or injury to staff	3	1		Keighley Town Council has Employers Liability insurance of £10,000,000 Policy Number: RGBDX6962034		Annual	TC

			<p>Staff handbooks are reviewed by the councils HR Advisor to ensure the policies are up to date.</p> <p>Council has a £4,000 staff training budget to support any employee training needs</p>		
Business Interruption	3	1	<p>I.T system in place which includes a secure independent cloud-based server.</p> <p>Insurance Policy includes Business Interruption cover.</p>	Annual	RFO
Loss of cash through dishonesty or theft	3	2	<p>The Council has Officer Liability cover of up to £500,000. The insurance policy includes employee dishonesty cover up to a maximum of £680,000.</p> <p>Annually reviewed Financial Regulations are in place and cover the payment of invoices.</p> <p>Standard Operating Procedures are in place for the processing and paying of invoices. Invoices are checked by Administration Officer, approved by the relevant budget holder and doubled checked by RFO who processes the payments.</p> <p>Invoices are paid online via the councils online banking facilities. Payments require two officer approval before the payment is confirmed.</p>	Annual	TC/ RFO
Key Member of staff being unavailable	2	2	<p>Annual budget includes £5,000 for the provision of temporary staff to cover absences if required.</p> <p>Council insurance policy includes Key Person cover up to £250 per week or £2,500 per</p>	Annual	TC

			insurance period. Standard Operating procedures (SoP's) in place for key areas of work. SoP's are stored on the council's server and accessible to all staff members.			
Requirements met under employment law and HMRC regulations	1	2	The Council contracts its payroll Bradford MBDC. Bradford MBDC makes Inland Revenues calculations and deals with the Yorkshire Pension Scheme.			
Risk Assessments – fire, legionella etc in the Civic Centre Risk of fire, injury to staff, residents, councillors and visitors.	3	1	Health & Safety advisors carry out an annual inspection of the Civic Centre along with reviewing all relevant risk assessments. All maintenance contracts are listed on the contracts register. Register includes, contract start date, end date and a review date. Integrated Access system with the fire, intruder, and access system into the Civic Centre. Providing protection for staff, tenants, councillors and visitors.		Annual	C&I

	Severity	Likelihood	Risk rating	Controls in place	Additional controls required	Timeframe	Responsible officer
Damage to or loss or theft of assets	3	1		<p>All valuable assets (except community assets) locked securely at Civic Centre. Insurance in place for contents and all council assets.</p> <p>The Civic Centre covered by an intruder alarm linked to a 24 hour a day monitoring service. Named keyholders identified and contact details are provided to the monitoring service.</p> <p>Access to the building is either by an access fob or by intercom. Staff confirm who is at the door before remotely opening the door.</p> <p>On second floor a new internal door has been fitted to separate the council's offices from public areas. Door is only accessible with a door fob.</p> <p>CBMDC holds title to the Civic Regalia and a loan agreement is in place. The Town Council is responsible for the insurance of civic regalia The Mayor and Officers ensure its safe stewardship whilst in the care of KTC. There is a Building security in place for the Civic Centre.</p> <p>Civic Regalia included on Insurance Policy Number: RGBDX6962034</p>		Annual	TC

SECTION B areas where there may be scoped to work with others who manage risk:							
Allotments	1	1		<p>Regular inspections are carried out by the Allotment Officer. A risk assessment is held for the allotments and communicated to allotment holders and is publicly available via the Council's website.</p> <p>Number of plot inspections forms part of the Councils KPI's. Current target is to inspect 60 plots per quarter.</p> <p>The Council also adopts an annual Allotment Policy which is reviewed on a yearly basis.</p>	Review Allotment Policy	May-21	AO
Town Hall Square & Church Green	2	2		<p>Regular inspections are carried out by the Allotment Officer.</p> <p>Annual maintenance regime in place and undertaken by a third-party contractor.</p> <p>A risk assessment is held by the council and sight of the contractor's risk assessment, insurance and method statements are to be obtained. Town square railings are listed on the Town Council Asset Register.</p> <p>New lease agreements currently under negotiation with Bradford MDC as landowners.</p>	Contract up for review in September 2021	May-21	C&I
Banking Services	3	1		<p>Multiple signatories required to make any payments. These are changed on yearly basis following the election of a new Mayor.</p> <p>Council utilises online banking. Payments are</p>			

			made online, removing the use of cheques for majority of payments. Payments require approval before being made from the online account.			
Professional services and contractors	1	2	<p>Requirement for quotations is contained within financial regulations.</p> <p>Council approved Procurement policy specifies the requirements subject to the expected cost of the work.</p> <p>Council maintains a contract register which details start date, end date and a review date for all contracts held.</p>			
Salaries paid to Bradford MBDC 6 months in arrears	3	1	<p>Bradford MBDC pays salaries direct to staff members on a monthly basis.</p> <p>Monthly salary reports provided from BMDC.</p>			
Computer back up. Loss of records	1	3	<p>All council files email systems are protected via an encrypted server.</p> <p>Council has an annual contract with Cosurica for the maintenance of its entire I.T systems. Contract extended until February 2022.</p>	Staff need to attend Disaster Recovery workshop provided by Cosurica as part of their contract.	Oct-21	TC
Events Reputational Damage Lack of Funding Injury to staff, members of public, etc Weather causing cancellation	2	1	Each Event managed by the Town Council has its own Event Plan and Risk Assessment. Any outside suppliers are required to provide copies of Public Liability insurance, Food Hygiene (if applicable), risk assessment and method statements if appropriate. First aid is provided if			AEO

			<p>the event risk assessment deems it appropriate.</p> <p>Council has appointed an Administration & Events Officer who has the day to day responsibility for event preparation, and event management under the direct supervision of the Town Clerk.</p> <p>Annual event plan agreed by Events & Leisure Committee.</p>			
Grit Bins	2	2	<p>Town Council owns 88 grit bins. Sites are assessed against a set criteria. Grit is filled by the Town Council contractor they twice a year.</p> <p>Grit Bin policy approved by council and reviewed every 12 months.</p> <p>Council completed an audit of grit bins in October 2020.</p>			

	Severity	Likelihood	Risk rating	Controls in place	Additional controls required	Timeframe	Responsible officer
SECTION C Areas where there may be a need to self-manage risk							
Project Delivery	1	1		<p>The Town Council undertakes a number of projects which rely on Councillor Input. Regular reports are made to the Community Development Committee which oversee the work. The committee manages its approved budget within Financial Regulations.</p> <p>Terms of Reference for Community Development Committee agreed by Council and included in the Council's Scheme of Delegation.</p> <p>The Council has adopted a 3 year Town Plan 2020-2023 which identifies key aims and objectives the council wishes to achieve during those 3 years.</p>			ATC/ CDO
Keeping proper financial records in accordance with statutory regulations	1	3		Financial records are kept in accordance with statutory requirements, which are the responsibility of Keighley Town Council and are reported as part of the audit process.			RFO
Complying with restrictions on borrowing	1	2		The Council has one longstanding loan via the PWLB until 01.09.2060. The annual repayment amount is factored into the annual budget process to ensure commitments are met.			

	Severity	Likelihood	Risk rating	Controls in place	Additional controls required	Timeframe	Responsible officer
All requirements met under Employment law	2	2		<p>Salary forecasts are undertaken as part of the budget setting process.</p> <p>The Council receives Employment Advice from a specialist HR firm, Ellis Whittam, contract was renewed for a further 3 years commencing in May 2021.</p> <p>Contracts and Employee handbook reviewed in May 2020.</p> <p>Council approved Appraisal system in place. Appraisals are undertaken in September each year.</p>			
Adequacy of precept	1	2		<p>There is a rigorous process for the setting of the budget.</p> <p>The Council has an Investment Strategy to ensure any investments carry the appropriate level of risk for the council.</p> <p>Budget Working Group process followed as part of the 2021/22 budget process.</p>	Develop a Reserves Strategy	June 2021	TC
Proper use of funds awarded to community groups	2	2		<p>The Council currently has General Power of Competence and a grant awarding policy. Receipts/invoices are requested as part of the grant completion documentation.</p>	.		

			<p>GPC reaffirmed in November 2020 following the Clerk obtaining the CiLCA qualification.</p> <p>Council adopted a grant policy. A grant SoP has been developed which includes gathering necessary M&E for grants awarded.</p>			
Minutes numbered	1	2	Minutes are numbered and signed by the relevant Chair at the subsequent meeting.			
Electors wishing to exercise their rights of inspection	1	3	Right of inspection is adhered to, according to legislation. The council has a model publication scheme which is available on the council website.			
Register of interests, gifts and hospitality	2	2	<p>The Members interests are held in a locked filing cabinet. A copy is also held by the Monitoring Officer and via the Keighley Town Council website.</p> <p>Council approved a gift and hospitality policy in September 2020. Gifts register will be published annually.</p>	Publish Gift register in May 2021.	May 2021	TC
Regular scrutiny of financial records	1	2	<p>All payments are approved by Finance & Audit Committee.</p> <p>Each month Finance & Audit Committee appoint 2 councillors to undertake spot checks of payments made.</p> <p>Some budgets/expenditure are delegated to committees and the Clerk. Details are contained within the Scheme of Delegation and minutes. All payments are approved by the</p>			

				Finance & Audit Committee on a monthly basis.			
Regular returns of VAT	1	2		The RFO is responsible for the completion and submission of quarterly VAT returns. This process is checked by the Internal Auditor			
System of performance management	2	2		Staff appraisal process adopted by Council. Appraisals are carried out in September each year and are reviewed after 6 months.			
Adoption of Code of Conduct for Councillors and Employees	2	2		Keighley Town Council has a code of conduct for all members which are signed by members at the commencement of their term in office. Staff are governed by their contracts.			
Review of internal controls and their documentation	1	2		Internal controls are in place and reviewed by the Town Clerk, RFO, Policy & Governance committee. SoP's are in place for key areas of work. Such as finance, processing of invoices, processing grants.			
Transaction testing of income and expenditure	1	2		Covered during internal audit process and as part of internal control. 2 Councillors undertake monthly spot checks of the council's finances.			
Council acting with legal powers and according to proper practices	1	1		The Town Clerk holds a CiLCA qualification. As well as undertaking additional training to ensure staff are up to date with latest policy. The Council is a member of YLCA and the Clerk a member of SLCC			
Up to date register of assets	1	2		Reviewed annually. Additional items added to register at time of purchase.			
Annual review of risks and adequacy of the insurance cover	1	2		The Clerk adds items to the insurance as they are purchased. The Policy & Governance committee reviews the insurance and makes			

				recommendations to the full council			
Ensuring robustness of insurance providers	1	2		The insurer for the Council is Came and Company who have experience of local council insurance			
Internal Audit Assurances	1	2		Internal Controls are reviewed as necessary by the RFO and councillors who have responsibility for checking internal controls and internal auditor. Any issues identified are reported to the Finance & Audit committee			
Annual Governance & Accountability Return	1	2		AGAR is approved by Council each year in line with regulations and following the completion of the Internal Audit.			
Internal audit documentation	1	2		Reported to the Finance & Audit following receipt from the Internal Auditor.			
Internal control testing	1	2		Testing of specific internal controls by councillors with responsibility for financial controls and reporting findings to Finance & Audit committee.			
Annual budget	1	1		There are transparent processes to ensure that the budget is effectively drawn up. The draft budget is considered at the December Finance & Audit committee before being approved by Full Council before the end of January			
Arrangements to detect fraud and corruption	1	2		Invoices are subject to scrutiny by the RFO, two councillors check against invoices and sign the schedule of payments at the Finance and Audit Committee meeting, payments are then processed via online banking which requires two officers to approve any payments from the bank account. his information along with the cashbook forms part of the twice-yearly internal audit.			
Monthly bank reconciliations	1	2		Presented to and checked monthly at the monthly Finance and Audit Committee.			
Civic Centre Function Room	2	2		Annual income target set for function room hire.			

Hire Income				The council will implement a Marketing and Communication plan throughout 2021/22 to increase usage of the centre.			
Bar supplies	2	2		The council has an account with ABV Wholesale who supply Beers, Wines, Spirits and Soft Drinks to the Town Council. Stock is only ordered when bookings require the bar.	Develop an SOP covering stock taking pre and post bookings	May 2021	TC
Handling Cash payments	2	2		Staff provided cash float at the start of each event. Staff required to complete the sales sheet detailing a breakdown of cash taken.	The council will install PDQ machines and encourage card/contactless payments. Develop comprehensive guidance for all staff responsible for bar service.	June 2021 June 2021	TC/ RFO TC/ RFO

NOTES

SEVERITY refers to the urgency and importance of the activity
 LIKELIHOOD How likely something is to happen / or not happen

1 is low and 3 is high