



RISK REGISTER (March 2022)

“The greatest risk facing a local authority is not being able to deliver the activity or services expected of the council” (Governance and Accountability – A Practitioner’s Guide)

Risk is the threat that an event or action will adversely affect an organisation’s ability to achieve its objectives and to successfully execute its strategies. Risk management is the process by which risks are identified, evaluated and controlled. It is a key element of the framework of governance together with community focus structures and processes, standards of conduct and service delivery arrangements.

Risk Policy Statement

Minchinhampton Parish Council (MPC) recognises that it has a responsibility to manage risks effectively in order to protect its Councillors, employees, assets, liabilities and the community against potential losses; to minimise uncertainty in achieving its goals and objectives and to maximise its opportunities. The Parish Council is aware that some risks can never be fully eliminated and has tried to ensure it has a strategy that provides a structured, systematic and focussed approach to managing risk. It is also aware that its staff and members may have limited knowledge and expertise in some areas, so professional support will be sought for specialist areas of responsibility.

Approach to Risk Management

MPC’s approach to risk management is to identify and manage risks in the most cost-effective manner within overall resources available. Each risk identified by the Council is recorded in the risk assessment document. The impact is assessed, and control measures the Council feel to be appropriate are put in place, together with the frequency with which each risk should be reviewed.

Responsibility for Risk Management

MPC recognises that responsibility for effective risk management rests with all members of the Council. The co-operation and commitment of all members of the Council and staff are required to ensure that council resources are not wasted as a result of uncontrolled risk. This policy therefore applies to all Councillors, employees, contractors or others who may be carrying out operations for and on behalf of the Council, and those who may be affected by their work.

This Risk Register will be reviewed annually by the Finance Committee.

1. FINANCE

Subject	Risk(s) Identified	H/M/L	Management/Control of Risk	Review/Assess/Revise
Annual Return	<ul style="list-style-type: none"> ▪ Not submitted within time limit ▪ Not published in compliance with regulations 	L L	<p>Year-end accounts are submitted to the Internal Auditor then approved by Council.</p> <p>Annual Return is completed in accordance with the regulations and sent to the External Auditor within the time limit.</p> <p>Dates for the deadline are stated by the external auditor.</p>	Existing procedure adequate.
Bank and Banking	<ul style="list-style-type: none"> ▪ Inadequate checks ▪ Bank mistakes ▪ Bank charges ▪ FSCS limits exceeded ▪ Internet hacking 	L L L L M	<p>MPC have Financial Regulations that set out the requirements for banking, cheques and reconciliation of accounts.</p> <p>The RFO reconciles the accounts monthly when the bank statement is received. Any errors would be communicated to the bank and Chairman immediately. Two signatures are required for every cheque issued.</p> <p>FSCS (Financial Services Compensation Scheme) covers deposits to £85k; if funds held over this amount, accounts will be reviewed, and money moved accordingly.</p> <p>Internet Banking procedure to be established when Council starts to use it for payments, requiring dual authorisation for every transaction.</p> <p>Antivirus software on Clerk's, RFO's and every signatory's computer to be kept updated.</p>	<p>Existing procedure adequate.</p> <p>FRs reviewed annually.</p> <p>Bank signatories reviewed annually and with personnel change.</p> <p>Bank statements and reconciliation checked monthly.</p> <p>New Internet Banking policy to be written and agreed.</p>
Best Value Accountability	<ul style="list-style-type: none"> ▪ Work awarded incorrectly ▪ Overspend on services 	L L	<p>As per Financial Regulations, best practice would be to seek whenever possible at least 3 quotations for work over £100.00.</p> <p>For major contract services, formal competitive tenders will be sought.</p> <p>If problem is encountered with a contract the Clerk would investigate, check quote/tender, research problem and report to Council.</p>	<p>Existing procedure adequate.</p> <p>Review Financial Regulations regularly.</p>
Rentals Receivable	<ul style="list-style-type: none"> ▪ Tenants not paying on time ▪ Changed to contract not accepted 	L L	<p>Vestry Cottage and Vosper Field all rented out with legally binding contracts reviewed at the correct time.</p> <p>Vestry Room contract being drawn up at time of writing.</p>	Existing procedure adequate.
Councillor allowances/ expenses	<ul style="list-style-type: none"> ▪ Councillors over (or under) paid 	L	<p>No allowances are allocated to Councillors. The Chairman has a limited 'discretionary fund'.</p> <p>Any expenses are currently claimed by presenting the relevant receipt to the Clerk for approval/payment in the same manner as other payments.</p>	Existing procedure adequate.

		L	Expenses are monitored to ensure the budget is not exceeded and expenditure reported monthly to the Council. MPC expects to introduce a Council Debit/Credit card when it moves fully to online banking	MPC Debit/Credit Card policy to be introduced at same time.
Election Costs	<ul style="list-style-type: none"> ▪ Unexpected election cost ▪ Impact to other reserves which could prevent other activities from happening 	L	Sufficient monies are budgeted to be available should the need arise.	Reviewed in annual budget.
Financial Records	<ul style="list-style-type: none"> ▪ Inadequate records ▪ Financial irregularities 	L	MPC Financial Regulations set out requirements. The Clerk and Deputy Clerk receive training to ensure knowledge is up to date. The accounts system includes reconciliations and ability to pull reports (on EDGE) for sense-checking, to reduce arithmetic and system errors. The Internal Auditor checks all records as required. Review of receipts and payments is provided monthly to the full Council.	Existing procedure adequate. Review the Financial Regulations when necessary.
Grants payable	<ul style="list-style-type: none"> ▪ No power to pay or authorisation of Council to pay 	L	MPC has a Grant Funding Policy that sets out the requirements. All such expenditure goes through MPC required process of approval and is minuted. Any grants awarded have the terms and conditions satisfied before money is released.	Existing procedure adequate.
Grants receivable	<ul style="list-style-type: none"> ▪ Incorrect amount received or paid in 	L	Grants would be received/checked as being due by Clerk. All receipts would be reported to the Council and recorded in the minutes.	Existing procedure adequate.
Invoices	<ul style="list-style-type: none"> ▪ Goods not supplied but billed ▪ Incorrect invoicing ▪ Errors in authorisation ▪ Unpaid invoices 	L L L L	The Council' Financial Regulations set out the requirements. Invoices are only submitted for approval once the Clerk has inspected the goods/services received. Cheques are then presented to signatories with the relevant invoice. All invoices are initialled by 2 signatories. Schedule of payments is produced for approval at each Council meeting and minuted accordingly.	Existing procedure adequate. Review Financial Regulations when necessary.
Legal Powers	<ul style="list-style-type: none"> ▪ Illegal or unlawful activity or payments 	L	All activity and payments within the powers of MPC to be resolved and minuted at full Parish Council meetings or delegated committees.	All activities and payments minuted.

Precept	<ul style="list-style-type: none"> • Adequacy of precept • Requirements not submitted to Stroud District Council (SDC) • Amount not received from SDC 	L L L	The Council commences the review of the precept requirements annually in September/October when the Finance Committee consider a first draft on known income and expenditure. The presented budget will include actual position and projected position to year end and estimated figures for the next financial year. A first overall draft is then considered with a further Finance Committee meeting to agree amounts set for specific budget headings for the following year. Final budget figures to be formally agreed at December full Council meeting; precept request is then sent to SDC for collection through Council Tax. This request is submitted by the Clerk in writing. The Clerk informs the Council when the precept is received.	Existing procedure adequate.
Reporting and Auditing	<ul style="list-style-type: none"> • Information and communication • Compliance 	L L	Budget monitoring statement and bank balances to date produced each month for full Council for information. A full list of receipts, transfers (where relevant) and cheques to be signed is provided at the meeting and the full detail balanced against the bank statement/reconciliation and checked by a Councillor monthly. All changes to budget at Finance Committee or full Council are supported by a minuted resolution	Existing communication procedures adequate. Councillor to be appointed to check financial records for fidelity compliance.
Salaries and Associated Costs	<ul style="list-style-type: none"> • Salary paid incorrectly • Wrong deductions of NI or Tax • Unpaid NI and Tax contributions to HMRC • Pension • Expenses paid correctly 	L L L L L	MPC authorises the appointment of all employees through a recruitment process. Staff have contracts of employment and job descriptions. Salaries are according to NALC national pay scales. Payroll (and thus deductions of NI, tax and pension contributions) are completed externally by PATA. Amount due to HMRC is advised to Clerk who then sends the cheque at the correct time of the month. Clerk/Deputy Clerk's expenses accompanied by appropriate receipts and checked by Chairman as required.	Existing procedures adequate.
Changes to Contracts of Employment	<ul style="list-style-type: none"> • Council fails to review contracts when there is a change in relevant legislation • Risk of financial and reputational loss 	L L	All staff contracts to be reviewed annually by the Clerk and delegated Staffing Committee. SLCC and GAPTC are used for employment and legislation advice as required. All staff will have an Annual Review where performance, salary review etc can be discussed and recorded on a formal basis.	Existing procedures adequate.

VAT	<ul style="list-style-type: none"> Failure to reclaim 	L	Financial Regulations set out the requirements. MPC is not VAT registered and submits a return once a year, at year end. Clerk/RFO adopts a system to diarise reminders. Reclaims are reconciled with cash book.	Existing procedure adequate.
Community Infrastructure Levy	<ul style="list-style-type: none"> Failure to monitor CIL income Failure to spend by the given deadline Failure to spend CIL money on allowed projects 	L L	CIL income and spending reported through Finance Committee; tracker now in place to record what CIL is received and when it needs to be spent by, along with understanding of what it can be spent on/put towards.	Existing procedure adequate.

2. MANAGEMENT

Subject	Risk(s) Identified	H/M/L	Management/Control of Risk	Review/Assess/Revise
Business Continuity	<ul style="list-style-type: none"> Risk of Council not being able to continue its business due to unexpected circumstances 	M	<p>The Council's everyday working files are held on computer network which can also be accessed by Clerk and Deputy Clerk from home. Necessary paper records are retained in accordance with MPC's retention policy as well as on the website.</p> <p>The Finance Chairman has copies of all access passwords.</p> <p>In the event of the Clerk/Deputy Clerk being long-term indisposed, a locum will be arranged.</p> <p>When legislation permits, MPC is set up to use 'Zoom' for video meetings</p>	Review procedures annually.
Council records - electronic	<p>Loss through:</p> <ul style="list-style-type: none"> Theft or fire Damage, corruption or loss of laptop 	L L	<p>MPC electronic records are stored on a password protected council owned computer at the office. The system is backed up onto an external hard drive by the Clerk on a regular basis.</p> <p>Deputy Clerk has new laptop which allows access to MPC drives from home via VPN. Laptop not kept in office overnight.</p> <p>System security outsourced to Softlink.</p>	Existing procedures adequate.

Council records - paper	Loss through: <ul style="list-style-type: none"> theft fire damage 	L L L	MPC is focussing on moving toward paperless office other than in circumstances where legal requirement means we must keep hard copies of documents. Necessary paper records are retained in accordance with MPC's retention policy as well as on the website. Historic files have been transferred to public archives.	Existing procedures adequate.
Data Protection GDPR	<ul style="list-style-type: none"> Policy provision Non-compliance with GDPR 	L L	Data Protection requirements stated in Council's Standing Orders. Ensure employees and Councillors receive training and are aware of their responsibilities. Annual register of Information Commissioner's Office maintained.	Existing procedure adequate. Provide training where appropriate.
Employees	<ul style="list-style-type: none"> Loss of key personnel Fraud by staff Unlawful action taken by staff Breach of Health and Safety 	M L L M	Proactive management to ensure employees are well motivated and respected. Contingency arrangements and reserves in place to provide adequate cover in the event of employee absence. Policies in place to address staff grievances and annual appraisals taking place. Employees made aware of their responsibilities for H&S; MPC H&S policy and training provided as required. Clerk and Deputy Clerk provided with relevant training reference books. Access to assistance and legal advice required to undertake roles. Regular contact with the Chairman. All activity and payments within the powers of MPC to be resolved and minuted at full Parish Council meetings.	Existing procedure adequate. Chairman to maintain regular contact with all employees. Monitor working condition safety requirements and insurance regularly.
Freedom of Information Act	<ul style="list-style-type: none"> Failure to recognise requests and/or comply adequately 	L	Provide support to Clerk in provision of information if FOI request received.	Monitor and report any impact of request made under FOI Act.
Insurance	<ul style="list-style-type: none"> Inadequate cover Expensive policy Lack of compliance Fidelity guarantee compromised 	L L L L	An annual review of level of cover, MPC requirements going forward and the insurance arrangements in place is undertaken and put to full Council before policy renewal. Ensure Asset Register is up to date. Ensure compliance measures are in place. Ensure fidelity checks are in place.	Existing procedure adequate.
Legal Powers	<ul style="list-style-type: none"> Illegal or unlawful activity or payments 	L	All activity and payments within the powers of MPC to be resolved and minuted at full Parish Council meetings.	All activities and payments minuted.
Meeting Location	<ul style="list-style-type: none"> Inadequate Breach of H&S 	M L	Full MPC meetings currently held at external venue (Baptist Church Hall) as with Covid, The Trap House is considered too small since Covid for all Councillors, employees and public. Toilets are down spiral staircase (of listed building) so access not ideal.	Existing location inadequate; permanent suitable external venue sought.

3. ASSETS

Subject	Risk(s) Identified	H/M/L	Management/Control of Risk	Review/Assess/Revise
Maintenance	<ul style="list-style-type: none"> Poor performance of assets or amenities 	M	<p>An Asset Register is kept up to date, and insurance is held at the appropriate level for all items.</p> <p>All assets owned by MPC are regularly reviewed and maintained. All repairs and related expenditure are actioned/authorised in accordance with correct MPC procedures.</p> <p>Regular inspections of playgrounds (and allotments) carried out and annual inspections done by RoSPA.</p> <p>Any defects highlighted actioned accordingly (or where relevant, the landowner advised)</p>	Existing procedure adequate.
Noticeboards/Bus shelters etc	<ul style="list-style-type: none"> Risk/damage/injury to third parties Need for replacement 	L L	<p>MPC has 8 noticeboards sited around the Parish.</p> <p>All locations have approval by relevant parties and insurance cover is in place.</p>	Existing procedure adequate.
Benches	<ul style="list-style-type: none"> Risk/damage/injury to third parties Need for replacement 	M	<p>MPC currently has responsibility for 82 benches on National Trust (NT) land in the Parish.</p> <p>MPC is unable to get a response from NT re repair or replacement of benches and has therefore written to NT to propose handing the responsibility back; response awaited.</p>	Assess and revise in a month.
Vestry Cottage	<ul style="list-style-type: none"> Business tenant does not look after the building 	L	<p>Vestry Cottage is rented out with legally binding Business contract reviewed at the correct time. It is then sublet by the Church. Extensive repairs/maintenance carried out 2021.</p>	Existing procedure adequate.
The Trap House	<ul style="list-style-type: none"> Loss of, or damage to, the Parish office and property will affect the council's ability to carry out its business 	L	<p>The Parish Council owns the building (PWLB loan still being paid off)</p> <p>Security alarm is in place in the building.</p> <p>Key holder policy is in place and all key holders documented whether staff, councillors or contractors.</p> <p>Fire safety systems and equipment in place and reviewed annually.</p>	<p>Existing procedure adequate.</p> <p>Review key holder policy, security and fire safety on an annual basis or when change necessitates.</p>
Allotments	<ul style="list-style-type: none"> Risk of injury to allotment holder Risk of vandalism Risk of fire 	L L L	<p>Use of allotments is at tenants' own risk; they provide all equipment and must maintain their allotment to prevent injury or accidents. Rules reviewed annually.</p>	Existing procedure adequate.

4. LIABILITIES

Subject	Risk(s) Identified	H/M/L	Management/Control of Risk	Review/Assess/Revise
Employer Liability	<ul style="list-style-type: none"> Non-compliance with employment law 	L	<p>Insurance in place.</p> <p>Undertaken adequate training and seek guidance from NALC/SLCC as appropriate.</p> <p>Seek professional support for specialist areas of responsibility.</p>	Existing procedures adequate.
Legal Liability	<ul style="list-style-type: none"> Lack of clarity of legality of activities Inaccurate reporting via minutes Lack of document control 	L L L	<p>Clerk to clarify legal positions on proposal and to seek advice if necessary.</p> <p>Parish Council always receives and approves minutes at monthly meetings.</p> <p>Retention of document policy in place.</p> <p>Seek professional support for specialist areas of responsibility.</p>	Existing procedures adequate.
Legal Powers	<ul style="list-style-type: none"> Illegal activity or payments Working parties taking decisions 	L L	<p>All activity and payments made within the powers of MPC (not ultra vires) and to be resolved and clearly minuted.</p> <p>Ensure working parties understand only the Parish Council can make decisions.</p>	Existing procedures adequate.
Minutes/Agenda/ Notices/Statutory Documents	<ul style="list-style-type: none"> Inaccurate minutes Unlawful actions Public notice not given sufficient notice Missing documents Business not conducted correctly 	L L L L L	<p>Minutes and agenda are produced in the prescribed manner by the Clerk according to legal requirements. Minutes are approved and signed at the following Council meeting. Minutes and agenda are displayed according to legal requirements, on noticeboards and on MPC website.</p> <p>Business conducted at Council meetings is managed by the Chair and advised by the Clerk.</p>	<p>Agenda and minutes regularly posted on MPC website.</p> <p>Members adhere to Code of Conduct.</p>
Public Liability	<ul style="list-style-type: none"> Risk to third party, property or individuals 	L	<p>Insurance is in place.</p> <p>Risk assessments regularly carried out to comply with requirements if necessary.</p>	Existing procedures adequate.

5. COUNCILLOR'S PROPRIETY

Subject	Risk(s) Identified	H/M/L	Management/Control of Risk	Review/Assess/Revise
Members Interest	<ul style="list-style-type: none"> • Conflict of interest not declared • Register of Members Interests 	<p>M</p> <p>M</p>	<p>Councillors are solely responsible for the completion and submission of their Register of Members Interests and that it is a legal requirement; it is not the Council's responsibility.</p> <p>Councillors have a duty to declare any interests at the start of the meeting, reminder is on each agenda.</p> <p>It is not the responsibility of the Clerk to cajole a member with a potential interest to actually declare it; it is the sole responsibility of the member concerned.</p> <p>Register of Members Interest forms to be reviewed regularly by Councillors.</p>	<p>Check understanding of requirements as new councillors are appointed.</p> <p>Members to take responsibility themselves to update the Register.</p>

Approved and adopted by Minchinhampton Parish Council on 28th March 2022; Minute Ref 210/22

Next review date: March 2023