

Wilton Town Council Risk management policy

A policy setting out how the Council will identify, assess, address and review risks



Legal context

Wilton Town Council has adopted this risk management policy in accordance with guidance set out in *Governance and Accountability for Local Councils - a Practitioners' Guide (England)* issued by the Joint Practitioners Advisory Group (JPAG) and also to give effect to the Health and Safety at Work Act 1974.

The purpose of this policy

Compliance with this policy ensures that the Council assesses and addresses the risks associated with its activities. This policy aims to identify the steps needed to avoid or address risks and to provide increased confidence in the Council's corporate governance arrangements.

10 November, 2018

1. Background

- 1.1. Risk is an uncertain event or condition that, if it occurs, will have an effect on the achievement of Wilton Town Council's objectives. Risk management is the process whereby the Council methodically address the risks associated with what it does and the services it provides. The focus of risk management is to identify what can go wrong and take proportionate steps to avoid this or successfully manage the consequences. Good risk management allows stakeholders to have increased confidence in the authority's corporate governance arrangements and its ability to deliver its priorities.
- 1.2. Risk management is not just about financial management; it is about protecting the achievement of objectives set by the Council to deliver high quality public services. The failure to manage risks effectively can be expensive in terms of litigation and reputation, and can impact on the ability to achieve desired outcomes. The authority generally and members individually are responsible for risk management.
- 1.3. Risk management is an ongoing activity that comprises four elements:
 - a) identifying risks;
 - b) assessing risks;
 - c) addressing risks; and
 - d) reviewing and reporting.

2. Identifying risks

2.1. In order to manage risk, the Council needs to know what risks it faces. Identifying risks is therefore

the first step in the risk management process.

- 2.2. The Council will identify the key risks to achieving successfully its priorities and service objectives, in the following categories:
 - a) financial loss of money;
 - b) security fraud, theft, embezzlement;
 - c) property damage to property;
 - d) legal breaking the law or being sued;
 - e) IT failure of IT systems or misuse; and
 - f) reputational actions taken could harm the authority's public reputation.

3. Assessing risks

- 3.1. Having identified potential risks, the Council assesses the likelihood of it happening and the impact it would have, using JPAGs recommended assessment process. This allows the Council to identify low, medium and high risks when considering measures it should take.
- 3.2. Wilton Town Council's risk assessment matrix:

$\left\{ \right\}$		~	Highly likely (3)	Medium (3)	High (6)	Very high (9)
	Likelihood		Possible (2)	Low (2)	Medium (4)	High (6)
			Unlikely (1)	Very low (1)	Low (2)	Medium (3)
				Negligible (1)	Moderate (2)	Severe (3)
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4. Assessing risks

4.1. Risk is unavoidable, and every organisation needs to take action to manage risk in a way which it can justify to a level which is tolerable. The response to risk, which is initiated within the Council, is called 'internal control' and may involve one or more of the following standard responses:

	For risks that are containable; where the possible controls cannot be justified (e.g.					
Tolerate	they would be disproportionate) and where risks are unavoidable e.g. terrorism.					
Treat	Imposing controls so that the organisation can continue to operate; or introducing					
Treat	measures to deal with the risk.					
Transfer	Buying in a service from a specialist external body or taking out insurance. Some					
Transfer	risks cannot be transferred, especially reputational risk.					
Torreinato	Avoiding or cancelling activities where no response can bring the risk to an					
Terminate	acceptable level.					

- 4.2. The Council will uses insurance to help manage risk include the following:
 - a) The protection of physical assets owned by the authority buildings, furniture, equipment, etc. (loss or damage).
 - b) The risk of damage to third party property or individuals as a consequence of the authority providing services or amenities to the public (public liability).
 - c) The 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).
 - d) Loss of cash through theft or dishonesty (fidelity guarantee).
 - e) Legal liability as a consequence of asset ownership (public liability).
- 4.3. The limited staff resources available to the Council means that it works with specialist external bodies to help manage risk include the following:
 - a) Security and maintenance for vulnerable buildings, amenities or equipment.
 - b) The provision of services being carried out under agency/partnership agreements with principal authorities.
 - c) Banking arrangements, including borrowing or lending.
 - d) Ad hoc provision of amenities/ facilities for events to local community groups.
 - e) Markets management.
 - f) Vehicle or equipment lease or hire.
 - g) Trading units (leisure centres, playing fields, burial grounds, etc.).
 - h) Professional services (planning, architects, accountancy, design, etc.).

5. Reviewing and reporting

- 5.1. Having identified likely risks, the Council records this in the Wilton Town Council Risk Register (Appendix 1). This register is kept under review by the Responsible Financial Officer and is reported to the Finance and General Purposes Committee.
- 5.2. The Council seeks advice and guidance on risk management from its insurers JPAG, the National Association of Local Councils, the Society of Local Council Clerks and other training providers. The Council provides training for its staff through the CiLCA qualifications and additional specialist training where appropriate.



Wilton Town Council

Risk Register

Draft 31 February 2019



Categories of risk

- **1.** Financial loss of money, fraud, theft, embezzlement
- 2. Property damage to property
- **3.** Legal breaking the law or being sued
- 4. IT failure of IT systems or misuse
- **5.** Reputational actions harm the council's public reputation

Reviewed by	Town Clerk	Draft Document prepared by Clerk 10.02.19							
		Target circulated date: Friday 15 th March 2019							
		Submitted to A&P Committee:							
	Submitted to F&GP Committee								
Approval required by	Council	Target: 3 rd April 2019							
Approved and adopted	Council	ТВС							
· · · · ·									
Next Review Date: September 2019									



1. Financial

Risk	Resp	Description	Impact	Likelihood	Impact	Risk rating	Mitigation
<u>no.</u> 1.1	F&GP	Precept not sufficient for intended purpose	The council has insufficient income for the forthcoming year	score 1	2	2	Budgeting process is robust – budget working group reports to the principal committees and the committees report to Council in January. Budgeting is now fully undertaken using RIALTAS software and broken down by committee. Variations and spend is monitored in real time. Revisions can be made throughout the year to bring in additional funds from reserves and other external sources – such as s106 projects. Projected spend is now monitored as part of the devolved budgeting arrangements to the committees. Actions required: NONE
1.2	F&GP	Loss of cash through theft or dishonesty (fidelity guarantee)	The council loses income and assets	1	2	2	No cash now kept in the Office. 90% of transactions online. All payments subject to approval by two elected members of the Council. All cheques to be signed by two elected members. No credit or debit card in the possession of staff. Insurance cover maintained. Actions required: NONE
1.3	F&GP	The council does not identify its risks	Financial, criminal or reputational loss.	1	2	2	Annual review of risk undertaken by F&GP Committee and Council and larger scale activities such as the Christmas Lights event have a separate risk assessment carried out and reviewed by the Clerk. Actions required: NONE
1.4	F&GP	The council is not insured adequately	Financial, criminal or reputational loss.	1	3	3	F&GP Committee reviews insurance policy annually to ensure adequate cover is maintained. RFO works with the broker annually to confirm adequate cover. Axa is one of the top ten companies on a policy arranged through Came and Company a specialist provider of local council insurance.
1.5	F&GP	Failure to correctly award contract for services or the purchase of capital equipment.	The council does not award contracts correctly resulting in financial or reputational loss to the council.	2	2	4	Standing Orders will be reviewed in May 2019 Financial Regulations will be reviewed in May 2019 Actions required: NONE
1.6	F&GP	The council does not act legally and exceeds its powers.	The council risks financial and reputational loss.	1	3	3	Clerk training for CILCA to ensure high standard of competency; Assistant Clerk completing ILCA. Section 137 expenditure reported separately within the budget. Actions required: Chair of F&GP Committee to undertake monthly review of receipts and payments, the cashbook and bank reconciliations.

1.7	F&GP	Activity does not match information reported.	The council does not know of activity undertaken and risks financial loss. An unauthorised activity takes place.	1	2	2	Schedule of payments submitted to F&GP for approval All online payments require 2 councillors to authorise before payment. Cheques authorised by two councillors. Password protection for internet and telephone banking. Oversight of income and expenditure from payment schedule to cashbook and bank statements undertaken by both Chair of F&GP and Internal Auditor. Processing of orders and authorisation of invoices separated between the Clerk and Assistant Clerk Actions required: NONE
1.8	F&GP	Contracts are not reviewed annually.	The council does not achieve value for money or works are not carried out correctly.	1	2	2	WC cleaning contract under review. Grounds maintenance contract to be discussed as part of the WC asset transfer process. Utility contracts to be reviewed May 2019 – possibility of transferring to a green energy provider. Actions required: NONE
1.9	F&GP	Failure to adhere to codes of practice for procurement and investment	Financial loss to the council.	1	2	2	Covered by Standing Orders and Financial Regulations; Professional advice sought on larger projects. Actions required: NONE
1.10	F&GP	Failure to regularly reconcile bank accounts.	The council is unaware of its financial position. Financial loss to the council.	1	2	4	Monthly reconciliation undertaken by Clerk and Assistant Clerk using RIALTAS software and online banking services. Bank reconciliations reported to F&GP Committee. Annual review by Internal Auditor.
1.11	F&GP	The council does not scrutinise income or expenditure.	The council is unaware of its financial position. Financial loss to the council. Risk of reputational loss.	1	3	3	Monthly expenditure schedule reported to F&GP Committee and signed by the Chair following approval. Regular budget monitoring reports submitted to committees and council giving real time information about spend and income. Oversight of income and expenditure from payment schedule to cashbook and bank statements undertaken by both Chair of F&GP and Internal Auditor. Processing of orders and authorisation of invoices separated between the Clerk and Assistant Clerk Actions required: NONE

1.12	F&GP	Salaries and contributions are not paid correctly.	The councils risks reputational and financial loss	1	2	2	Salaries of staff are paid by the Clerk Salaries reported to budget working group – including increases approved by JNC. Pension calculations checked annually. All items checked by Internal Auditor. Meetings arranged to facilitate achievement of HMRC and pension scheme deadlines.
							Actions required: Council to investigate the cost of an external payroll service to create a clear separation between staff and payroll duties.
1.13	F&GP	The council fails to review contracts of employment for all staff and does not take account of any changes in relevant legislation.	The council risks financial and reputational loss.	1	2	2	NALC model contracts used for Clerk and Deputy Clerk, agreed in 2018 Actions required: annual review by staffing committee.
1.14	F&GP	Council does not charge or claim back appropriate VAT	The council risks financial loss.	1	2	2	Financial regulations set out requirements. VAT returns submitted online quarterly by the Clerk. Internal Auditor checks Annually. RIALTAS business solutions will be providing and update to their software and training to ensure compliance with HMRC changes regarding online filing. Actions required: Financial Regulations to be updated in May 2019
1.15	F&GP	The council fails to make required submissions to HMRC and/or Wiltshire Pension Fund.	The council risks being fined.	1	2	2	HMRC records are prepared through HMRC Basic Pay Tools Online payment of Wiltshire LGPS reported to F&GP Committee. Clerk has powers to authorise payments and report retrospectively to F&GP in appropriate situations Actions required: NONE
1.16	F&GP	The council does not monitor its budgets adequately.	The council is unaware of its income or expenditure against targets set. Financial loss to the council.	1	2	2	Regular budget monitoring statements & projections prepared by RFO and presented to Committees. From April 2019 this includes real-time projected spend to enable likely areas of overspend or underspend to be identified and addressed. Actions required: NONE
1.17	F&GP	The council does not monitor income – grants (eg S106), CIL or loans correctly.	Financial loss to the council.	1	2	2	PWLB payments monitored by F&GP committee. S106 income is reported as part of the project review – such as the tennis courts works. Income is included in the budget and monitored by committee. Actions required: NONE
1.18	F&GP	Minutes of meetings are not properly kept	The council risks reputational damage. Risk of illegality of decisions.	1	2	2	Actions required: Minute books to be reviewed and kept updated in the Council Chamber.

3. Legal

Risk	Resp	Description	Impact	Likelihood	Impact	Risk	Response
no.				score	score	rating	
3.1	F&GP	Legal liability as a consequence of asset ownership (public liability)	The council has to contest legal cases that may lead to financial or reputation loss.	1	3	3	 The Council maintains appropriate insurance cover with Axa insurance. This is a specialist local government insurance policy covering: Property Damage Business Interruption Money and Personal Accident Assault Group Personal Accident Employers Liability (covering staff and volunteers) Public and Products Liability Officers Liability (Officials Indemnity) Council Legal Liability and Legal Expenses (including Employee Dishonesty) Actions required: Review insurance cover for artworks and archival materials.
3.2	F&GP	The risk of damage to third party or individuals as a consequence of the council providing services or amenities to the public (public liability)	An insurance claim may be made against the council	2	2	4	All amenities and public open spaces, managed by the Parish Council are insured with Axa for public liability up to a maximum of £10 million. Risks are assessed on an annual basis. And facilities are monitored weekly by the Council's principal contractor, IdVerde. In 2019, the Council made a successful insurance claim relating to damage to the St Mary's Churchyard wall. Actions required: NONE
3.3	F&GP	Legal liability as a consequence of an event (public liability)	The council has to contest legal cases that may lead to financial or reputation loss.	2	2	4	A risk assessment is carried out for each event and shared with key personnel. An event owner is assigned. All third parties booked for events are asked to supply their own risk assessment and a copy of their PLI. Actions required: Develop a new risk assessment template for public events.
3.4	F&GP	Failure of professional services employed by the council.	The council may use unqualified or insufficiently qualified professionals leading to loss.	1	2	2	Staff are supported to obtain professional qualifications through CiLCA. The council will use properly accredited professionals who appear on approved contractor lists from SLCC or NALC; or have sought recommendation, proposals and quotes from 3 providers for any advice. Advice service from both SLCC and WALC (subset of NALC) regularly used as first port of call for advice. Professionals should have in place professional indemnity insurance.

3.5	F&GP	Loss of Clerk/RFO	The Council may be unable to undertake all	1	4	4	The council is insured for loss of key personnel for up to a maximum of £2.5k. A locum clerk may be available through contact with SLCC or NALC. The
			duties and				Assistant Clerk has been trained on key aspects of the role in the event that
			responsibilities in a way				the Clerk was unavailable and is undertaking the CiLCA qualification (starting
			that is complaint with				with iLCA). The Clerk's inbox and IT files are accessible by the Assistant Clerk.
			current legislation				
							Actions required: Additional training for AC and increased insurance cover to
							provide additional resources in the event of the loss of the Clerk.

4. IT

Risk	Resp	Description	Impact	Likelihood	Impact	Risk	Response
no.				score	score	rating	
4.1	F&GP	Business continuity	Loss of Parish Office would restrict access to documentation	2	2	4	All files are electronically stored and accessible in the cloud. Copies of recent leases are held by the Council's Solicitors. A hard copy of Minutes is maintained as well as copies of approved minutes on the parish website (separate to the Office 365 cloud copy). Actions required: IT Security and data back-up policy to be reviewed.
4.2	F&GP	The council risks losing files and data	The council is unable to carry out its business and regulatory requirements.	2	2	4	 All files are stored in the Office365 system which is cloud hosted. Actions required: IT Security and data back-up policy to be reviewed. IT security audit to be commissioned
4.3	F&GP	Unrestricted access to council data	Council data is accessible to non-council staff	2	2	4	Passwords are in place to access computers, datafiles, and finance systems. Actions required: A data protection policy is required to cover the management, retention, transfer and disposal of data.
4.4	F&GP	Accessing Electoral Roll data	An offence may occur if data is not used correctly	1	3	3	The data is password protected and can only be accessed with the authority of the Clerk. Actions required: NONE



5. Reputational

Risk	Resp	Description	Impact	Likelihood	Impact	Risk	Response
no.				score	score	rating	
5.1	F&GP	The council does not respond to enquiries from the public	The council risks reputational damage.	2	2	4	Telephone enquiries dealt with at the time and recorded if considered important. E-mail and other mail dealt with and filed. Important communications shared with all members of the Council. Actions required: NONE
5.2	F&GP	The council fails to handle documents correctly.	The council risks reputational damage.	1	2	2	Policies are now in place in line with GDPR legislation. These cover the management, retention, transfer and disposal of data. All staff are briefed on their responsibilities in accordance with these policies Actions required: NONE
5.3	F&GP	Members are unaware of the Council's policy regarding declarations of interests and the receiving of gifts and hospitality	The council risks reputational damage.	1	3	3	Recording and monitoring members' interests, gifts and hospitality received undertaken by Clerk. Code of conduct, Standing Orders and Financial Regulations are all reviewed annually by Council. New Councillors joining part way through a year/term are all issued with a copy of these key policies. Gifts and/or hospitality of £25 or over should be recorded in a register kept by the Clerk as required by the Code of Conduct Actions required: NONE
5.4	F&GP	Members (or employees) do not behave to the standards expected	The council risks reputational damage.	2	3	6	Revised code of conduct for Members re-adopted May 2018 Actions required: NONE

2. Property and facilities

Risk	Resp	Description	Impact	Likelihood	Impact	Risk	Response
no.				score	score	rating	
2.1	F&GP	Parish Office - fire, loss or damage.	The loss or damage to buildings or assets will affect the council's ability to carry out its business. Loss of rental income.	2	3	6	 Insurance updated to represent new value of building since alterations in 2018. Fire alarms regularly checked and maintained. Security system regularly checked and maintained. Actions required: Fire-fighting equipment to be procured. Repair and maintenance schedule to be prepared Combustible materials to be removed.
2.2	F&GP	Parish office – assets	Financial and reputational loss to the Council.	2	3	6	 High value silver items kept in the safe. All other buildings contents insured by Axa Actions required: Asset register and valuation Separate insurance assessment of high value items Archival assessment by WC
2.3	A&P	Castle Meadow Pavilion – fire, loss or damage.	Loss of income from hire fees	2	2	4	 Insurance cover provided by Axa. Fire alarms regularly checked and maintained. Security system regularly checked and maintained. CCTV system installed. Fire alarm system installed. Fire-fighting equipment to be procured. Shutter and door locks. Actions required: CCTV system repaired and maintained. Electrical testing carried out annually. Repair and maintenance schedule to be prepared Hire agreement reviewed to cover risks.
2.4	A&P	Castle Meadow Sports Field - risks to users	Claims for compensation arising from accidents, injuries and physical harm. Reputational risk.	2	3	6	 Public liability indemnity maintained through Axa. Play and gym equipment inspected weekly by grounds maintenance contractor – Idverde. Actions required: Playing fields to be free of dog mess. Ceptic tank - regular maintenance schedule. Electrical testing carried out annually. Information boards and warning signs

2.5	A&P	Cemetery Lodge - fire, loss or damage.	The loss or damage to buildings or assets will affect the council's ability to carry out its business.	2	2	4	Security alarm installed but no fire alarm. Regular weekly inspections by contractors and lead Councillor. Actions required: Arrange fire safety inspection Investigate the installation of a fire alarm system.
2.6	A&P	Cemetery	Claims for compensation arising from accidents, injuries and physical harm. Reputational risk.	1	2	2	Regular weekly inspections by contractors and lead Councillor. Actions required: NONE
2.7	A&P	Council owned play areas: Bulbridge, Minster Street (including tennis courts), Wishford Road. Risk of accidents.	Equipment may become unsafe and cause risk of injury to users. Risk of legal claims for compensation and associated, reputational harm.	2	2	4	All play equipment and associated furniture insured by the Town Council with Axa and inspected weekly by the Council's contractors, Idverde> Maintenance/repair issues are reported to the Clerk. Damaged equipment is removed or fenced off where required. The publicly accessible Defibrillators (Baptist Church, Castle Meadow and Community Centre) are checked monthly by the Assistant Clerk. Tennis courts closed between December and April to avoid risk of frost. Actions required: NONE
2.8	A&P	Council owned play areas: Bulbridge, Minster Street, Wishford Road. Risk of loss or damage.	Equipment may be damaged and have to be removed from use. Potential financial loss to the Council and reputational harm.	3	1	3	All play equipment and associated furniture insured by the Town Council with Axa. All equipment and furniture could be replaced with 21 days. All play equipment is inspected weekly by the Council's contractors, Idverde, and any maintenance/repair issues are reported to the Clerk. Damaged equipment is removed or fenced off where required. The publicly accessible Defibrillators (Baptist Church, Castle Meadow and Community Centre) are checked monthly by the Assistant Clerk. Actions required: NONE
2.9	A&P	Public conveniences – risk of accidents and/or loss/damage	Slips, trips and falls hazards. Risk of legal claims for compensation and associated, reputational harm.	1	3	3	Insured with Axa. Inspected daily by the Council's contractors, Idverde, and any maintenance/repair issues are reported to the Clerk. Any damaged equipment, leaks or blockages are repaired within 14 days of report and the facility may be closed during this period depending on the risk involved. Actions required: Review WC cleaning contract.
2.10	A&P	Old St Mary's Church Yard - risk of accidents and/or loss/damage	Damage to property> Slips, trips and falls hazards. Risk of legal claims for compensation and associated , reputational harm.	2	3	6	Insured with Axa. Inspected weekly by the Council's contractors, Idverde, and any maintenance/repair issues are reported to the Clerk. Frequent damage caused by cars, litter, dog mess and graffiti also reported. Actions required: New dog bin and signs

2.11	A&P	Outdoor Assets – Bins, Benches, Bus Stops & Signage	Risk of injury (splinters, trip hazard, minor cuts etc)if outdoor assets are not well maintained. Risk of Vandalism or other damage to equipment which in turn could cause injury	1	2	2	Assets are checked throughout the year by the Council's grounds maintenance contractor, IdVerde. Damage caused by weather is routinely inspected, cleaned and/or repaired. Replacement and repairs are undertaken as required. Actions required: NONE
2.12	A&P	Open Space Contract activities – grass cutting, hedge trimming/cutting, managing shrubbery	Risk of injury to both public and contractors if sensible precautions not put in place	1	2	2	All contractors who carry out work for the Parish must have PLI insurance to a minimum of £5m. Contractors approved by Wiltshire Council. Actions required: NONE
2.13	A&P	Water Features – Rivers, ditches and fountain.	Risk of injury or drowning to public if signs are disregarded	1	3	3	Castle Meadow and Minster Street have adjoining rivers and watercourses. The Council is taking steps to minimise risks to users of these facilities. The fountain in Minster Street has been brought back into operation and a separate review of its use is recommended. Actions required: signage required review of fountain safety.
2.14	A&P	Litter Picking	Risk of injury if involved in litter picking – glass or other dangerous item or from a collision with bikes or vehicles.	1	3	3	Parish Warden always wears high vis garment – Volunteers covered by the Councils insurance with Axa. High visibility wear, gloves, pickers and bags (with hoops) to be provided. Safety guidelines to be provided to volunteers and organisers. Children always properly supervised by either parents or group leaders (e.g. Brownies or Cubs) and evidence of Safeguarding required. Actions required: New safety equipment to be purchased (budget provided)
2.15	A&P	Ownership of Trees – the Council is responsible for a large number of trees on its land and open spaces.	Damage caused to or by trees which endangers public safety or causes legal nuisance to others.	2	3	6	Parish Trees are inspected by the Council's grounds maintenance contractors on a weekly basis. Issues are reported to the Clerk and action taken where necessary following inspection by arboriculture contractor. Actions required: Trees should be surveyed and mapped using Pear Technology, regular maintenance programme required.
2.16	A&P	Failure of security for buildings, amenities or equipment – e.g.store at Castle Meadow	Buildings, amenities or equipment may be damaged or stolen preventing use or access.	1	2	2	The Castle Meadow compound is secured and monitored by CCTV. Insured by Axa. Actions required: Improved access locks on main compound. CCTV system serviced.

2.17	A&P	Unauthorised traveller encampment	Damage caused to land or assets due to an unauthorised traveller encampment; costs incurred.	1	3	3	 The following procedure is in place to deal with unauthorised traveller encampments; the Clerk will: notify the Police, issue a code of conduct to persons, supply bin bags and request considerate use of the land ensure staff do not attend a site unaccompanied or without a mobile phone Serve notice to vacate and authorises the Clerk to put Bailiffs on standby if the encampment fails to vacate by the date specified on the notice Financial Regulations (no 4.5) allow for up to £5k of spend to clear the site and a further £1k to clean up the site An annual inspection to be carried out of all sites to assess for vulnerabilities to encampments.
2.18	A&P	Failure to identify work undertaken by contractors or suppliers.	The council does not know of work undertaken by contractors or suppliers or its outcome.	2	2	4	 The Council's grounds maintenance contractor, Idverde, provides a weekly inspection report for the WC and has a monthly meeting with the Clerk and Assistant Clerk to review performance and discuss any issues relating to all matters under the contract. All invoices are submitted to the Council for approval and are subject to scrutiny. Works not undertaken to a satisfactory standard are subject to review by the Clerk and payments may be held until resolved – for example the Christmas Lights 2019. Actions required: Revise the Council's procurement policy to strengthen contract monitoring. Revise official ordering documentation.

Risks reviewed: 14/03/2019