



# **Governance & Risk Management**

## **Policy and Register**

### **Diss Town Council**

Adopted by Full Council on 13/03/2023

Resolution No: FC/

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Clerk and CEO are inter-changeable titles, as are Deputy Clerk and COO.

## **Governance & Risk Management Policy**

### **1. Purpose of a Risk Management Policy**

- 1.1 Diss Town Council recognises that it has a responsibility to manage the risks, both internal and external, and is therefore committed to the implementation of a risk management strategy to protect the Council from unavoidable losses.
- 1.2 This Policy places a responsibility on all Members and Officers to have regard for risk in performing their duties. Its purpose is to enable the Council to manage its risks through anticipation and control. This should in turn lead to conscious choices as to the most appropriate method of dealing with each risk, be it elimination, reduction, transfer or acceptance.
- 1.3 Risk management will strengthen the ability of the Council to achieve its objectives and enhance the value of services provided whilst safeguarding public resources.
- 1.4 This Policy provides assurances to members and officers on the adequacy of arrangements for the conduct of business and the use of resources. Implementation of the policy leads to greater risk awareness and improved control, which should mean fewer incidents and control failures.
- 1.5 There is a requirement under the Accounts and Audit Regulations 2015 s3(c) that local Councils must ensure they have a sound system of internal control which includes effective arrangements for the management of risk. Risks and their control will be identified and collated in a Risk Register which will be managed by the RFO.

### **2. The Principles of Risk Management**

#### **2.1 Risk Management Policy Statement**

The Audit Commission (2001) defined “risk” as an event or action which will adversely affect an organisation’s ability to achieve its objectives, project plans and processes and to successfully execute its strategies. Therefore “risk management” is the process by which risks are identified, evaluated and controlled.

The Council recognises that it has a responsibility to manage risks effectively in order to protect its employees, assets, liabilities and community against potential losses, to minimise uncertainty in achieving its aims and objectives and to maximise the opportunities to achieve its vision.

Whilst it is acknowledged that risk cannot be totally eliminated it is accepted that much can be done to reduce the extent of injury, damage and financial loss. Therefore, The Council is committed to identifying, reducing or eliminating the risks to both people and the environments.

The Clerk will ensure that the Council have insurance in such amounts and in respect of such perils as will protect against significant losses, where insurance is required by law or contract and in other circumstances where risks are insurable, and premiums cost-effective.

The Council will seek to embed effective risk management into its culture, processes and structure to ensure that opportunities are maximised; it will seek to encourage managers to identify, assess and manage risks, and learn to accept the right risks.

### 3. Risk Management?

3.1 Risks can be classified into various types, but it is important to recognise that for all categories direct financial losses may have less impact than the indirect costs such as disruption of normal working. The examples below are not exhaustive:

- a) Strategic Risk - long-term adverse impacts from poor decision-making or poor implementation. Risks damage to the reputation of the Council, loss of public confidence, in a worst-case scenario a Judicial Review or Report in the Public Interest.
- b) Compliance Risk - failure to comply with legislation or laid down procedures or the lack of documentation to prove compliance. Risks exposure to prosecution, Judicial Review, employment tribunals, additional audit investigation, inability to enforce contracts.
- c) Financial Risk - fraud and corruption, waste, excess demand for services, bad debts. Risk of additional audit investigation, public objection to accounts, reduced service delivery, increased Council tax levels/impact on Council reserves, increased Council borrowing.
- d) Operating Risk - failure to deliver services or maintain buildings/property effectively, malfunctioning equipment, hazards to service users, the general public or staff, damage to property. Risk of insurance claims, higher insurance premiums, lengthy recovery processes, increased Council tax levels/impact on Council reserves, increased Council borrowing.

3.2 These risks can be broken down further into specific areas which could impact on the achievements of the Council's long-term objectives and day-to-day delivery of services:

- a) Political - Those associated with the failure to deliver either local, regional or national policy.
- b) Financial – Those affecting the ability of the Council to meet its financial commitments; failure of major projects; internal and external audit requirements; failure to prioritise and allocate resources effectively; poor contract management; new ideas overload; poor internal controls leading to fraud/mismanagement
- c) Social – Those relating to the effects of changes in demographic, residential, or socio-economic trends on the Council's ability to deliver its corporate priorities.
- d) Technological – Those associated with the capacity of the Council to deal with the pace/scale of technological change, or its ability to use technology to address changing demands.

3.3 It would also include the consequences of internal failures on the Council's ability to deliver its objectives.

- a) Legal – The ability of the Council to keep up to date with changes in legislation and ensuring compliance to avoid breaches in legislation).
- b) Partnership/contractual – Those associated with the failure of partners/contractors to deliver services to an agreed cost and specification and similarly failure of the Council to deliver services to an agreed cost and specification; compliance with procurement policies (internal/external); ensuring open and fair competition.
- c) Human Resources – Those associated with the professional competence of staff; lack of training and development; over reliance on key personnel; ineffective project management; recruitment and selection issues; inadequate personnel policies
- d) Organisational – Those associated with the review of services and delivering continuous improvement.
- e) Health & Safety/Physical – Those related to fire, safety, accident prevention and health & safety which pose a risk to both staff and the public.
- f) Reputational – Those associated with the changing needs of customers and the electorate; ensuring appropriate consultation; avoiding bad public and media relations.

3.4 Not all these risks are insurable and for some the premiums may not be cost-effective. The emphasis should always be on eliminating or reducing risk before costly steps to transfer risk to another party are considered.

3.5 Risk is not restricted to potential threats but can be connected with opportunities. Good risk management can facilitate proactive, rather than merely defensive, responses. Measures to manage adverse risks are likely to help with managing positive ones.

#### 4. The Risk Management Process

- 4.1 Implementing this Policy involves identifying, analysing/prioritising, managing and monitoring risks, which should be controlled in the form of a Risk register.
- 4.2 Risk Identification – Identifying and understanding the hazards and risks facing the Council is crucial if informed decisions are to be made about policies or service delivery methods. The risks associated with these decisions can then be effectively managed. All risks identified will be recorded in the Council's Risk Register.
- 4.3 Risk Analysis – Once risks have been identified they need to be systematically and accurately assessed. Analysis should make full use of any available data on the potential frequency of events and their consequences. If a risk is seen to be unacceptable, then steps need to be taken to control it or respond to it.
- 4.4 The scores for impact and likelihood are multiplied. Risks scoring 4 and above will be subject to detailed consideration and preparation of a contingency/action plan to appropriately control the risk.
- 4.5 Risk Control – the process of taking action to minimise the likelihood of the risk event occurring and/or reducing the severity of the consequences should it occur. Typically, risk control requires the identification and implementation of revised

operating procedures, but in exceptional cases more drastic action will be required to reduce the risk to an acceptable level.

Options for control include:

- Elimination – the circumstances from which the risk arises are ceased so that the risk no longer exists.
- Reduction – loss control measures are implemented to reduce the impact/likelihood of the risk occurring.
- Transfer – the financial impact is passed to others e.g., by revising contractual terms.
- Sharing the risk with another party.
- Insuring against some or all of the risk to mitigate financial impact; and
- Acceptance – documenting a conscious decision after assessment of areas where the Council accepts or tolerates risk.

- 4.7 Risk Monitoring – The risk management process does not finish with putting any risk control procedures in place. Their effectiveness in controlling risk must be monitored and reviewed.
- 4.8 The information generated from applying the risk management process will help to ensure that risks can be avoided or minimised in the future. It will also inform judgements on the nature and extent of insurance cover and the balance to be reached between self-insurance and external protection.

## 5. **Implementation**

- 5.1 Initial Identification of Risks will be by officers compiling a list of the risks in their areas of responsibility.
- 5.2 The Council will annually reassess its objectives and any threats to achieving them. The Council will build risk management procedures into the way that it operates.
- 5.3 Officers developing projects or recommending service changes will ensure that risks are identified and the measures to eliminate or control risks are documented in agenda reports to be considered by the Council and/or its committees.
- 5.4 The Council is entering into an increasing number of partnerships with organisations from the public, private, voluntary and community sectors. Some of these organisations may not have the same sensitivities to the risks that the Council sees as important. Part of the process of setting up future partnerships will be to ensure that all relevant risks are identified and that appropriate control mechanisms are built into the management arrangements for the partnership.

## 6. **Roles and Responsibilities**

- 6.1 It is important that risk management becomes embedded into the everyday culture of the Council. The roles and responsibilities set out below are designed to ensure that risk is managed effectively across the Council, and responsibility for risk is allocated appropriately. Those who know the risks to a particular service should be responsible for it. The process must be policy driven but must also involve staff throughout the organisation.

6.2 Councillors – risk management is seen as a key part of the councillors' stewardship role and there is an expectation that they should lead and monitor the approach adopted. This will include:

- Review and approval of the Risk Management Policy.
- Analysis of key risks in reports on major projects, ensuring that all future projects and services undertaken are adequately risk managed.
- Annual review of Internal Controls; and
- Assessment of risks whilst setting the budget, including ensuring sufficient resources to tackle specific issues.

6.3 Senior Officers will act as the risk champions for their areas of specialty, assisting with identifying all risks within their remit and the compilation of the Risk Register. They will manage risk effectively in their service areas or projects and report how threats and risks have been managed to the Town Clerk/CEO. This includes identifying, analysing, prioritising, monitoring and reporting on service risks and any control actions taken.

Specific duties relating to individual officers are detailed below:-

6.4 Town Clerk/CEO – will act as the Lead Officer on Risk Management, overseeing the implementation of the detail of the Risk Management Policy and will:

- provide advice as to the legality of policy and service delivery choices.
- provide advice on the implications of potential service actions for the Council's corporate aims and objectives.
- update the Council on the implications of new or revised legislation.
- assist in handling any litigation claims.
- provide advice on any human resource issues relating to strategic policy options or the risks associated with operational decisions and assist in handling cases of work-related illness or injury.
- advise on any health and safety implications of the chosen or proposed arrangements for service delivery; and
- report progress to Council via the Executive Committee.

6.5 Responsible Finance Officer – as the Council's Section 151 Officer, will:

- work with the Town Clerk/CEO to assess and implement the Council's insurance requirements.
- assess the financial implications of strategic policy options.
- provide assistance and advice on budgetary planning and control.
- ensure that the Financial Information System allows effective budgetary control.
- inform investment decisions made by the Council.

6.6 Deputy Town Clerk/COO will:

- ensure that Risk Management is an integral part of any service review process.
- ensure that recommendations for risk control are detailed in service review reports.
- assist in developing and monitoring Performance Indicators for Risk Management.

6.7 Employees – will undertake their job within risk management guidelines ensuring that the skills and knowledge passed on to them are used effectively. All employees will

maintain an awareness of the impact and costs of risks and how to feed data into the formal process. They will work to control risks or threats within their jobs, monitor progress and report on job related risks to their Line Manager.

6.8 Internal Auditor – provides an important scrutiny role carrying out audits to provide independent assurance to the Executive Committee that the necessary risk management systems are in place and all significant business risks are being managed effectively.

- a) The Internal Auditor assists the Council in identifying both its financial and operational risks and seeks to assist the Council in developing and implementing proper arrangements to manage them, including adequate and effective systems of internal control to reduce or eliminate the likelihood of errors or fraud.
- b) The Internal Audit Report, and any recommendations contained within it, will help to shape the Council's system of Internal Control.

6.9 Training – Where appropriate risk management training will be provided to Councillors, senior officers and key staff to ensure that both Councillors and staff have the skills necessary to identify, evaluate and control the risks associated with the services they provide.

## 7. **Reporting on Progress**

The Town Clerk/CEO will present an annual report to the Executive Committee detailing progress on risk management over the year and providing a summary of the Risk Register as part of the review of internal controls.

## Governance & Management Risk Register

Risk Score					
Impact	5	10	15	20	25
	4	8	12	16	20
	3	6	9	12	15
	2	4	6	8	10
	1	2	3	4	5
	1	2	3	4	5
likelihood					

### OBJECTIVES:

- 1) To identify the management risks relevant to Diss Town Council
- 2) Estimate the significance of the risks.
- 3) Assess the likelihood of their occurrence.
- 4) Establish actions to address those risks.

### METHOD:

The impact that the risk presents is measured on a scale of 1-5 in terms of risk to quality of service, financial impact, safety implications, and delay in services. This shows the severity of the risk and its significance.

The likelihood of a risk is measured on a scale of 1-5, where 1 is very rare, 2 is once a year, 3 is more than once a year but less than once a month, 4 is once a month or more and 5 is daily or weekly. This shows how often there is an opportunity for the risk to occur.

No.	Risk	Details of Impact	Likelihood	Impact	Rating	Control Action	Review Frequency	Responsible Person(s)
1	Lack of forward planning and budgetary controls	➤ Lack of direction and prioritisation	1	4	4	24 mth strategy plan 3-year financial plan Clear and annually reviewed Financial Regulations	Annually by October	Town Clerk, Responsible Finance Officer; Council (RFO)
2	Poor reporting to Council	➤ Poor quality decision making ➤ Council becomes ill informed	2	3	6	Timely and accurate financial reporting Clear instructions to staff Regular project reports	Quarterly When required	Town Clerk, and RFO
3	Loss of key staff	➤ Failure in budgetary controls ➤ Correspondence backlog ➤ Loss of working hours ➤ Diversion of key staff from priority work	3	4	12	Succession Planning for Clerk & RFO Clear office procedures Clear budgetary procedures Good recruitment procedures and utilise recruitment agency where necessary. Open communication with both Town Council and staff Internal Auditor/Finance Assistant to cover end of year return if RFO unavailable	Annually	Council Leader; Town Clerk

4	Poor document control	<ul style="list-style-type: none"> <li>➤ Information not passed on in a timely manner</li> <li>➤ Deadlines missed</li> <li>➤ Lack of achievement</li> </ul>	3	1	3	<p>Clear Standing Orders Clear Job Descriptions Monitoring of staff progress Sound filing systems Use of fireproof cabinet where required Document Retention Policy</p>	Annually	Town Clerk, Dep TC, RFO
5	Non-Compliance with law, in particular: *Health and Safety *Equalities *Data Protection *Human Rights *Disability Discrimination	<ul style="list-style-type: none"> <li>➤ Fines and Penalties from regulation bodies</li> <li>➤ Employee action for negligence or grievance</li> <li>➤ Loss of reputation</li> </ul>	2	5	10	<p>Clear Policies and procedures Regular review of law Updated employment contracts Training programme for staff including induction procedure. Use of ACAS and other bodies to keep up to date. Use of Council appointed Human Resources advisor</p>	Bi-annual  Annually	Town Clerk and Line Managers
6	Ensuring all business activities are within legal power	<ul style="list-style-type: none"> <li>➤ Illegal expenditure</li> <li>➤ Poor public image</li> </ul>	2	3	6	<p>Recording the precise power under which unusual expenditure is being approved Officer training to keep up to date with legislation</p>	As required	Town Clerk, and RFO

7	Council lacks relevant skills and commitment	<ul style="list-style-type: none"> <li>➤ Higher cost to professional advice</li> <li>➤ Council fails to achieve its purpose</li> <li>➤ Decision making by-passes Council</li> <li>➤ Poor value for money</li> </ul>	1	4	4	<p>Clear co-option procedure</p> <p>Mandatory training for Councillors</p> <p>Close review of attendance</p> <p>Encourage good relationships between Officers and Councillors</p>	Annually Every meeting	Town Clerk; Council
8	Council becomes dominated by one or two individuals, or cliques form	<ul style="list-style-type: none"> <li>➤ Conflicts of interest</li> <li>➤ Pursuit of personal agendas</li> <li>➤ Decisions made outside Council</li> </ul>	2	3	6	<p>Clear Standing Orders regarding conduct of meetings and Conflict of Interests</p> <p>Training for Councillors</p> <p>Ensure all councillors are aware of the NOLAN principles and governance</p>	Annually	Council Leader
9	Sudden loss of councillors	<ul style="list-style-type: none"> <li>➤ Unable to make decisions if inquorate</li> <li>➤ Delay to decision making process</li> </ul>	2	4	8	<p>Ensure meetings are quorate</p> <p>Standing Orders would apply if not quorate and no business to be transacted</p> <p>Council by-election / co-option process would commence</p> <p>District Council informed if Council unable to transact business until by-election held</p>		Town Clerk Council Leader

No.	Risk	Details of Impact	Likelihood	Impact	Rating	Control Action	Review Frequency	Responsible Person(s)
10	Failure to register Members' interests, gifts, etc.	<ul style="list-style-type: none"> <li>➤ Member could make inappropriate gains</li> <li>➤ Could affect Council reputation</li> </ul>	1	3	3	<p>Annually record and monitor Members' interests and gifts</p> <p>Officers up to date with Code of Conduct procedures</p> <p>Annual review of Code of Conduct and Dispensation Policy</p> <p>Member training</p>	As required	Town Clerk
11	Lack of maintenance of Council owned property	<ul style="list-style-type: none"> <li>➤ Higher cost of repair</li> <li>➤ Injury to third party leading to claims</li> <li>➤ Damage to property</li> </ul>	2	3	6	<p>Building structural survey</p> <p>Stock condition survey</p> <p>Regular routine maintenance</p> <p>Insurance cover</p> <p>Facilities Management Plan</p>	Ten yearly Annually	Town Clerk Buildings & Facilities Manager
12	Damage or loss to Council owned property by third party or act of God.	<ul style="list-style-type: none"> <li>➤ High cost of repair</li> <li>➤ Loss of assets</li> <li>➤ Disruption to services</li> <li>➤ Damage to public property or person</li> </ul>	2	3	6	<p>Annual review of risk and adequacy of insurance cover</p> <p>Fire Alarm; Improved security</p> <p>Clear monitoring and auditing procedures by staff</p> <p>Maintain Asset Register</p>	Annually	Town Clerk and RFO

						Regular maintenance arrangements for physical assets  Backup IT service  Resilience / Business Continuity Plan <sup>§</sup>		Executive Committee
13	Damage to third party property or individual due to service or amenity provided	<ul style="list-style-type: none"> <li>➤ Claim against Council</li> <li>➤ Increased insurance premium</li> </ul>	2	3	6	Public liability insurance  Comprehensive event planning  Regular checks of facilities  Ensure all amenities/facilities are maintained to appropriate level  Health & Safety and risk assessments	As required	Town Clerk and RFO
14	Fraud, Misconduct or Gross Underperformance	<ul style="list-style-type: none"> <li>➤ Reduction in available funds</li> <li>➤ Loss of reputation</li> </ul>	2	4	8	Clear financial procedures and regulations  Staff / Member/ Internal control policies  Bi-annual internal audits  Adequate insurance cover  Full appraisal system in place to ensure continuous development and improvement	Annually	Town Clerk and RFO

15	Significant change in funding; sudden large expenditure required; excessive under-budgeting	<ul style="list-style-type: none"> <li>➤ Services not provided</li> <li>➤ Lack of confidence in Council</li> <li>➤ Inability to carry out functions</li> <li>➤ Insufficient funds for contingencies or projects</li> </ul>	1	4	4	<p>Robust budgeting process</p> <p>Regular in-year budget progress reports</p> <p>3-year financial plan</p> <p>Council has established adequate reserves</p> <p>Insurance in place to cover major risk</p> <p>Resort to other funding sources or Public Works Loan Board</p> <p>Correct deficit via budget planning over subsequent years</p> <p>Extend forward budget planning over several years</p>	<p>Annually</p> <p>Quarterly</p> <p>Annually</p>	Council / Town Clerk and RFO
16	Inappropriate VAT treatment	<ul style="list-style-type: none"> <li>➤ Penalties from HMRC</li> <li>➤ Excessive exempt VAT expenditure</li> </ul>	3	3	9	<p>Rigorous checks of proposed VAT treatment for all expenditure</p> <p>Measures to minimise business exempt expenditure where appropriate or seek alternatives when necessary (such as option to tax)</p>	<p>Bi-weekly</p> <p>As required</p>	Town Clerk and RFO
17	Non-compliance with restrictions on borrowing / inability of	<ul style="list-style-type: none"> <li>➤ Penalty payments</li> <li>➤ Negative PR</li> </ul>	1	4	4	<p>Include loan repayments in annual budget</p> <p>Clear Financial Regulations</p>	Annually	Town Clerk and RFO

	Council to repay a loan					Careful review of current procedures for borrowing	As required	
18	Failure to use grants received for intended purposes	<ul style="list-style-type: none"> <li>➤ Lack of funds for project for which grant was intended</li> <li>➤ Investigation into the use of funds</li> <li>➤ Repayment of funds</li> </ul>	2	2	4	<p>Ensure funds properly ring fenced</p> <p>Clear financial procedures</p> <p>Clear record in minutes</p>	As required	Town Clerk and RFO
19	Failure for local organisations to use grants given for intended purposes under specific powers or s137	<ul style="list-style-type: none"> <li>➤ Lack of funds for project for which grant was intended</li> <li>➤ Misuse of grant monies</li> </ul>	2	2	4	<p>Follow up on projects with project reporting form</p> <p>Maintain a separate record for s.137 expenditure</p>	Annually	Town Clerk and RFO
20	Not keeping the proper statutory financial records	<ul style="list-style-type: none"> <li>➤ Inadequate financial control</li> </ul>	1	5	5	Regular scrutiny of financial records and proper arrangements for the approval of expenditure	Annually	Town Clerk and RFO
21	Failure to plan for staff absence	<ul style="list-style-type: none"> <li>➤ Inability to pay staff and contractors</li> </ul>	2	4	8	<p>Maintain adequate staff to cover staff absences</p> <p>Monitor leave requests</p> <p>Succession Planning – usually member of Finance staff available.</p>	As required	Town Clerk and RFO

						If not, payments scheduled accordingly  Train Finance Assistant to manage accounts and payroll as a back-up		
22	Failure to register Town Council owned land	➤ Land ownership disputes	1	5	5	Ensure all Town Council owned land is registered with HM Land Registry	As required	Town Clerk and RFO
23	Failure to carry out Cemetery Record Checks	➤ Inaccurate allocation of exclusive rights / burial plots ➤ Loss of potential income ➤ Unnecessary distress to bereaved families	1	5	5	Checks of Cemetery Record by Finance Assistant	Quarterly	Town Clerk/ DepTC
24	Failure to have adequate limits of compensation on investment	➤ Significant financial loss of reserves ➤ Weak financial position	1	4	4	Regular review of current investments.  Investment Strategy review  Diversification of investments	Annually	Town Clerk/ RFO/Executive Committee
25	Misuse of credit card	➤ Financial loss	4	4	16	Appropriate controls on spending	Annually/ Monitored monthly	Town Clerk/

						Robust payment authorisation process  Accounting treatment through P/Ledger		RFO/Executive Committee
26	Risks associated with changing bank / Debtor delays	<ul style="list-style-type: none"> <li>➤ Money paid into the wrong account</li> <li>➤ Unable to maintain cash flow</li> </ul>	1	3	3	<p>To keep current account open to cover the overlap.</p> <p>Inform Debtors immediately</p>	After 6 months	Town Clerk/RFO
27	Disaster impacting on town	<ul style="list-style-type: none"> <li>➤ Loss of life</li> <li>➤ Casualties</li> <li>➤ Fear amongst community</li> <li>➤ Loss of / damage to Council assets or town facilities</li> </ul>	1	5	5	<p>Resilience / Emergency Response Plan</p> <p>Accept instructions from Category 1 responders i.e. Emergency Services, NHS Bodies &amp; higher tier authorities</p> <p>Council to take part in any learning reviews after any disaster</p>	Annually	Council / Town Clerk
28	Council Offices unserviceable (e.g. fire / flood)	<ul style="list-style-type: none"> <li>➤ Services suspended</li> <li>➤ Cost of repair / replacement of equipment</li> <li>➤ Loss of IT facilities</li> </ul>	1	5	5	<p>Business Continuity Plan</p> <p>No life-critical services provided</p> <p>Emergency management team called together to agreed priorities</p> <p>Enact Homeworking Policy</p>	Annually	Council / Town Clerk

						Short-term measured recovery in alternative accommodation to be agreed.  Medium / long-term plan to return to Council Offices  Backup service provided by existing IT supplier		
29	Media misreporting	➤ Incorrect messages being consumed by public ➤ Complaints ➤ Negative PR	3	3	9	Press releases / news items issued where relevant  Develop good relations with media  Follow Communications Policy  Council Leader / Clerk to brief journalists as per Comms policy	As required  4-yearly	Town Clerk / Council Leader / Town Mayor
30	Contractors not supplying agreed services	➤ Incomplete project ➤ Unsatisfactory outcomes ➤ Additional cost / time to complete project ➤ Relationship with contractor	2	4	8	All tasks are controlled by Purchase Order against specification  Review higher cost contracts to ensure they are controlled by defined contract or service level agreement	As required	Town Clerk / RFO
31	Confidential data being disclosed	➤ ICO investigation / fine ➤ Negative PR ➤ Complaints	3	4	12	Confidential data held in accordance with GDPR  Security measures in place and used e.g. safes, shredding, firewall		Town Clerk / Council

						Staff / Member GDPR policy  Nominated Data Protection Officer in place	Annually	
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