

25th January 2018

Notice is hereby given that there will be a Meeting of the **GOVERNANCE AND AUDIT COMMITTEE** held in the **NEW MILLENNIUM CHAMBER, MANOR HOUSE, CHURCH STREET, LITTLEHAMPTON** on **TUESDAY 6 FEBRUARY 2018** at **6.30PM**

Committee: Cllrs Northeast (Chair), C Blanchard-Cooper, Purchase, Squires and Warren QVRM

PETER HERBERT
Town Clerk

AGENDA

2017/2018

1. **EVACUATION PROCEDURES**

2. **FILMING OF COUNCIL MEETINGS, USE OF SOCIAL MEDIA AND MOBILE PHONES**

During this meeting the public are allowed to film the Town Council and Committee meetings and officers only from the front of the public gallery, providing it does not disrupt the meeting. Any items in the Exempt Part of an agenda cannot be filmed. If another member of the public objects to being recorded, the person(s) filming must stop doing so until that member of the public has finished speaking. The use of social media is permitted but Members and the public are requested to switch their mobile devices to silent for the duration of the meeting.

3. **APOLOGIES**

4. **DECLARATIONS OF INTEREST**

Members and Officers are reminded to make any declaration of disclosable pecuniary or personal and/or prejudicial interests that they may have in relation to items on this Agenda.

You should declare your interest by stating:

- (a) the item you have the interest in
- (b) whether it is a disclosable pecuniary interest, whereupon you will be taking no part in the discussions on that matter, or
- (c)
 - (i) whether it is a personal interest and the nature of the interest
 - (ii) whether it is also a prejudicial interest
 - (iii) If it is a prejudicial interest, whether you will be exercising your right to speak under PUBLIC FORUM

It is recorded in the register of interests that:

- Mr Purchase is a Member of Arun District Council and West Sussex County Council

- Mr Warren QVRM is a Member of Arun District Council
- Mr Northeast is a Member of Arun District Council

These interests only need to be declared at the meeting if there is an agenda item to which they relate.

5. **MINUTES**

To confirm the Minutes of the meeting held on 11th July 2017, circulated herewith (pages 3 – 5).

6. **PUBLIC FORUM**

Members of the public are invited to ask questions or raise issues which are relevant and are the concern of this committee. A period of 15 minutes is allocated for this purpose. If possible, notice of intention to address the Committee should be given to the Clerk by noon of the day of the meeting.

7. **CHAIR'S REPORT AND URGENT ITEMS**

8. **OFFICER'S REPORTS**

8.1 **Standing Orders and Financial Regulations Review**

Having undertaken a review of these documents, the Town Clerk and the Deputy Town Clerk and Responsible Financial Officer believe no changes are required. Members are therefore invited to read their copies in advance of the meeting and identify any issues for discussion.

8.2 **Annual Governance Review** – Report attached (pages 6 – 24).

8.3 **Internal Audit Report 2017/18** – Report attached (pages 25 – 31).

8.4 **Annual Review of Internal Controls** – Report attached (pages 32 – 37).

8.5 **Annual Review of Corporate Risk Register** – attached (pages 38 – 117).

The Committee is asked to consider and comment upon the updated Risk Registers and recommend them to the Policy and Finance Committee for approval (report attached).

8.6 **Complaints and Compliments Review 2017** – Report attached (pages 118 – 123).

8.7 **Draft Committee Work Plan** – attached for approval (page 124).

There is one major change to the Work Plan requiring approval. Following the successful implementation Electronic Communications procedures for the dispatch of meeting agendas to Members in June 2015, it is proposed that the Work Plan be updated with provision for this to be reviewed after local elections have been held.

9. **POLICY REVIEW**

Having undertaken a review of the following Policy documents, the Town Clerk and the Deputy Town Clerk and Responsible Financial Officer believe no significant changes are required. Where minor changes have been made these are highlighted on the attached policy documents. Members are therefore invited to read the policies in advance of the meeting and identify any issues for discussion.

9.1 **Anti-Fraud and Corruption Policy** – attached (pages 125 – 126).

9.2 **Whistle Blowing Policy** – attached (pages 127 – 133).

10. **MASTERPLAN – NORTH LITTLEHAMPTON**

11. **EXEMPT BUSINESS**

It is RECOMMENDED that:

The public and accredited representatives of the press be excluded from the Meeting under Section 100 Local Government Act 1972 due to the confidential nature of the business to be conducted.



MINUTES of a meeting of the GOVERNANCE AND AUDIT COMMITTEE held in the MILLENNIUM CHAMBER, MANOR HOUSE, CHURCH STREET, LITTLEHAMPTON on TUESDAY 11 JULY 2017 at 6.30PM

Present: Cllrs Northeast (Chair), Squires and Warren QVRM

2017/2018

1. EVACUATION PROCEDURES

The evacuation procedures were noted.

2. FILMING OF COUNCIL MEETINGS, USE OF SOCIAL MEDIA AND MOBILE PHONES

The procedures were noted.

3. APOLOGIES

There were apologies from Councillors Buckland and Purchase.

4. DECLARATION OF INTEREST

Members and Officers were reminded to make any declarations of disclosable pecuniary or personal and/or prejudicial interests that they might have in relation to items on the Agenda. There were none.

5. MINUTES

5.1 Regarding Minute 18.6, Annual Review of the Corporate Risk Register, the Deputy Town Clerk reported that a schedule of service area audits had been agreed with Councillor Warren QVRM and that the reviews were underway. The outcome would inform the annual review of the Register that was due in February 2018.

5.2 The Minutes of the meeting held on 7th February 2017 (previously circulated) were confirmed as a true record and signed by the Chair.

6. PUBLIC FORUM

There were no members of the public present.

7. CHAIR'S REPORT AND URGENT ITEMS

There were none.

8. OFFICER'S REPORTS

8.1 Internal Audit Update

8.1.1 The Responsible Financial Officer (RFO) presented a report (previously circulated) which set out details of the final Internal Audit Report for the financial year 2016/17. The report had been compiled following interim visits

by the Internal Auditor which took place in November 2016 and May 2017. Whilst there were no issues arising warranting formal comment, the Internal Auditor had made three recommendations, two of which related to supplementary information for the Annual Return and one suggesting that consideration be given to moving to an electronic payment system. The Chair congratulated the RFO and her team on the positive report.

8.1.2 The RFO explained the action that had been taken regarding the recommendations relating to additional information required to support the Annual Return. Regarding the recommendation relating to electronic payments, she explained that the workplan for 2017-18 was focussed on updating policies and procedures and bedding in changes to the financial software package. The Council also still had a large quantity of cheque paper that had been bought and needed to be used. It was therefore recommended that research into electronic payments systems was carried out during 2018-19.

8.1.3 The Committee proceeded to discuss the implications of implementing an electronic payments system in more detail and it was noted that payment systems and verification methods varied from bank to bank. Overserving that the Council was bound by the two-member signature rule, it was judged that if an electronic payments system was introduced, there would be a need for additional procedures and training for staff and Members. It was also suggested that online and card payments be investigated as part of this research and that enquiries be made with the Local Association and other authorities of a similar size to understand what was involved. The financial implications associated with implementing a new electronic payments system were not yet known. It was however considered that this would be beneficial in terms of efficiency for the Council and improving customer service. It was therefore **RESOLVED** that:

- 1. The RFO explores options relating to electronic payment systems in 2018-19.**
- 2. The contents of the final Internal Audit Report 2016/17 and the action taken in respect the Internal Auditor's recommendations be noted.**

8.2 Scheme of Delegation to Officers

8.2.1 The Committee had before it a report which included a revised Scheme of Delegation to Officers (previously circulated). The Town Clerk and Deputy Town Clerk had carried out a review of the current document, last updated in March 2016. The Scheme had been revised to reflect the changes to the staff structure over the past year. The main changes included bringing the titles of the Heads of Service posts into line with the current staff structure, namely:

- The Deputy Town Clerk and Responsible Financial Officer in place of the Finance and Resources Manager
- The Communications Manager and the Events Manager in place of the Events and Publicity Manager as appropriate (Section 3)
- Updates reflecting the delegation of powers between the Town Clerk and Deputy Town Clerk regarding their roles as the "Proper Officer" and Responsible Financial Officer respectively (Sections 4 and 5)

8.2.2 The Committee proceeded to review the delegations in the context of the current staff structure and the principles of delegation as defined in Section 1.4 of the Scheme. The Deputy Town Clerk and Committee Assistant provided clarity on several points and it was observed that the delegation relating to Ward Budgets had been removed following the decision of the Council some time ago. It was noted that the reinstatement of Ward Budgets was a matter for the Community Resources Committee to consider in the first instance. Where there was no provision for deputising or consultation specified, it was considered practical that it should be clearly stated as "none" in the Scheme. Reflecting on the changes to the Quality Council Scheme and the interview processes, it was thought sensible that this be updated with Council's recommended by the National Association. The Committee was otherwise satisfied with the revisions and it was **RESOLVED** that:

Subject to the amendments set out in Minute 8.2.2, the revised Scheme of Delegation be endorsed for recommendation to Full Council on 12th October 2017.

8.3 Code of Members' Conduct and Code of Corporate Governance Review
The Town Clerk and Deputy Town Clerk had undertaken a comprehensive review of these documents and no changes were proposed. Members were therefore invited to endorse the current documents. It was noted that the Code of Members' Conduct was last updated in Autumn 2014 to provide clarity for both the public and Members regarding participation in meetings where Members made Declarations of Disclosable Pecuniary Interests. It was also noted that the Code of Corporate Governance was based on guidance issued by the Chartered Institute of Public Finance (CIPFA) and Society of Local Authority Chief Executives (SOLACE). Members were satisfied that both documents were robust and up to date and it was **RESOLVED** that:

No further action be taken.

9. MASTERPLAN – NORTH LITTLEHAMPTON

There was nothing further to report.

10. EXEMPT BUSINESS

There was none.

The meeting closed at 7.17pm

CHAIR

LITTLEHAMPTON TOWN COUNCIL

Non- Confidential

Committee: Governance and Audit

Date: 6th February 2018

Report by: The Town Clerk

Subject: Annual Governance Review

1. Summary

The purpose of this report is to update Members on changes to the Local Assessment Procedure for dealing with Code of Conduct complaints that has been approved by Arun District Council and to report the impact if any, on the Town Council's governance arrangements.

2. Recommendations

The Committee is RECOMMENDED to:

- 1) Note the changes to the Local Assessment Procedure for dealing with Code of Conduct complaints by Arun District Council.
- 2) In noting these changes, to endorse the Town Clerk's initial response and consider any further comments from Members.
- 3) Endorse the recommendation from the Town Clerk that no changes are required to the Town Council's Governance arrangements in respect of the Members Code of Conduct and Declarations of Interests.

3. Background and Update

- 3.1 The Town Council's current Code of Conduct was adopted on 28th June 2012 following the implementation of The Localism Act 2011 (The Act). Since that time The Code and the documents that underpin it, the Members Declarations of Interests Form and Dispensation Scheme have been reviewed annually to ensure they keep pace with legislative and regulatory changes. Following a wide-ranging review of The Code by this Committee in September 2014, it was updated further on 9th October 2014.
- 3.2 The Act states that "a relevant authority" must promote and maintain high standards of conduct by members and co-opted members of the authority".

Councils fulfil this duty by adopting a Code of Conduct, the content of which must be consistent with the seven Nolan Principles of behaviour in public life and include provisions regarding the registration and disclosure of members “pecuniary interests” and “interests other than pecuniary interests”.

- 3.3 The provisions of The Act also require the Monitoring Officer of the relevant principal authority to establish and maintain a register of interests for members and co-opted members of the authorities within its area which must also be available for public inspection. Arun District Council is the principal authority for Littlehampton and will deal with Code of Conduct complaints under their Local Assessment Procedure.
- 3.4 On 8 November 2017 The District Council wrote to all authorities in its area to advise that the Local Assessment Procedure for dealing with Code of Conduct complaints had been revised (Appendix A attached to this report). The key changes related to the assessment procedure which has been refined by them with the aim of speeding up the investigation of complaints. This was implemented with immediate effect and all authorities have been sent details of the new arrangements. Having reviewed the revised procedure, the Town Clerk has forwarded initial comments to the Monitoring Officer to which she has responded (see Appendix B attached to this report). Members are asked to consider any further comments they may wish to make.
- 3.5 As part of their review the District Council also adopted a new Code of Conduct which, as the principal authority for the area they would like to see adopted as a standard across the District. This re-drafted Code does not alter the principles of the Code, nor the expectations of general conduct that the majority of councils, including the Town Council, have already signed up to.
- 3.6 The Town Clerk and Democratic Services Manager have examined the District Council’s revised Code in more detail whilst it provides more specific direction and guidance to support Councillors in completing their Register of Interests, making declarations at meetings and dispensations, these provisions already form part of the Town Council’s existing Code.
- 3.7 Whilst it is acknowledged that in terms of the Local Assessment Procedure, it would be desirable to have all councils in the area signed up to the same principles and guidance, it not considered necessary to make any changes to the Town Council’s Code of Conduct in this respect.

4. Financial Implications

There are none arising from this report.

Peter Herbert

Town Clerk

LOCAL ASSESSMENT PROCEDURE

Adopted by Arun District Council – 8 November 2017

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1 BACKGROUND

- 1.1 Under Section 28 of the Localism Act 2011, the Council must have in place “arrangements” under which allegations that an Elected or co-opted Councillor of the authority or of a Town or Parish Council within the authority’s area (herein after referred to as the ‘Subject Member’) has failed to comply with the authority’s Code of Conduct can be investigated and decisions made on such allegations.
- 1.2 These arrangements provide for the Council to appoint at least one Independent Person¹ whose views must be sought by the Council before it takes a decision on whether an allegation should be investigated, and whose views can be sought by the Council at any other stage, or by the Subject Member against whom an allegation has been made.
- 1.3 The Council has adopted a Code of Conduct for Councillors, which is published on the Council’s website and is available for inspection on request from the Council’s office (see below).
- 1.4 Each Town and Parish Council is also required to adopt a Code of Conduct. If you wish to inspect a Town or Parish Council’s Code of Conduct, it should be available on their website, or you can make enquiries of their Town or Parish Clerk.
- 1.5 All Parish councils within the Arun District, and Arundel Town Council, have signed up to Arun District Council’s Code of Conduct. Bognor Regis and Littlehampton Town Councils have developed their own Code of Conduct.

2 HOW TO MAKE A COMPLAINT

- 2.1 If you wish to make a complaint against a Councillor, please complete the online complaint form which can be found on our website (<http://www.arun.gov.uk/complaints-against-councillors>) or write to:

The Monitoring Officer
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Or by email to monitoring.officer@arun.gov.uk

- 2.2 The Monitoring Officer is a senior officer of the Council who has statutory responsibility for maintaining the register of Councillors’ interests and who is responsible for administering the system for complaints of Councillor misconduct.

¹ The Independent Person is a person who has applied for the post and is appointed by Councillors of the Council. The definition of an Independent Person can be found in Section 28 of the Localism Act 2011.

- 2.3 Please provide your name and address and contact details so that we can acknowledge receipt of your complaint and keep you informed of progress. Anonymous complaints will not be accepted.
- 2.4 As a matter of fairness and natural justice, the Subject Member will usually be told who has complained about them and receive details of the complaint. However, the Monitoring Officer may withhold your identity if he/she can be satisfied that there are reasonable grounds for doing so, e.g. belief that the complainant or any witness to the complaint may be at risk of physical harm or intimidation, or that their employment may be jeopardised if their identity is disclosed.

3 WILL MY COMPLAINT BE INVESTIGATED?

- 3.1 The Code of Conduct applies to Councillors whilst they are acting in their official capacity as a Councillor, or give the impression that they are acting in this capacity. The Code does not apply when they are acting in their capacity as a private individual.
- 3.2 If the Monitoring Officer is of the view that your complaint does not fundamentally relate to a code of conduct matter, then he/she will decline to progress it further under this procedure. For example, it is generally considered that complaints relating to the consideration of planning applications will not be dealt with under this procedure if there is an alternative legal remedy. You will be advised if this is the case.
- 3.3 Complaints which identify criminal conduct or breach of other regulations by any person, will be referred by the Monitoring Officer to West Sussex Police for consideration, in accordance with an agreed protocol (still to be confirmed), or any other regulatory agency.
- 3.4 If the Subject Member is no longer a Councillor, or resigns/is removed from office at any point during the investigation, the Monitoring Officer has the power to withdraw the complaint and take no further action. A record of the complaint will be kept on file in the event that the Subject Member returns to office in the future and a subsequent complaint is lodged against them.
- 3.5 In appropriate cases, the Monitoring Officer may seek to resolve the complaint informally, without the need for a formal investigation. Such informal resolution may involve the Councillor accepting that his/her conduct was unacceptable and offering an apology, or other remedial action. Where a reasonable proposal for local resolution is proposed, but you are not willing to accept that offer, the Monitoring Officer will take account of this in deciding whether your complaint merits formal investigation.
- 3.6 If your complaint relates to a Parish Councillor, the Monitoring Officer will seek the views of the Town/Parish Clerk about the complaint. Their view will be recorded in the investigation report and taken into account when a decision on whether to investigate is made.

4 WHEN WILL A COMPLAINT NOT BE ACCEPTED?

- 4.1 The resources involved in carrying out a formal investigation can be considerable and must be balanced by the severity of the complaint and the sanctions available to the Assessment Panel (see Appendix 2), should a breach of the code be found.
- 4.2 The Monitoring Officer has the discretion not to proceed with complaints, including those:-
- a) Containing no or insufficient evidence to demonstrate a breach of the Code;
 - b) Where there are alternative, more appropriate, remedies that should be explored first;
 - c) Where you and the Subject Member have agreed a local resolution e.g. a written or verbal apology, mediation;
 - d) Where the complaint is by one Councillor against another, a greater allowance for robust political debate (but not personal abuse or “unparliamentary” language) may be given;
 - e) That are malicious, politically motivated, or ‘tit for tat’;
 - f) Where an investigation would not be in the public interest or the matter would not warrant any sanction (see Appendix 2);
 - g) Where a substantially similar complaint has previously been considered and no new material evidence has been submitted;
 - h) Relating to allegations concerning a Councillor’s private life;
 - i) Relating to conduct in the distant past (over six months before);
 - j) Relating to dissatisfaction with a Council (or Parish Council) decision; and
 - k) About someone who is no longer a member of the Council (or relevant Parish Council) or who is seriously ill (see 3.4 above)

5 HOW IS THE INVESTIGATION CONDUCTED? – INITIAL ASSESSMENT - STAGE 1

- 5.1 On the basis that your complaint is accepted, the Monitoring Officer will acknowledge receipt of your complaint within 5 working days, confirm that it will be investigated and will keep you informed as the complaint investigation progresses.
- 5.2 The Monitoring Officer will appoint an Investigating Officer (IO), who may be another senior officer of the same authority, an Officer of another authority, or an external investigator.
- 5.3 The IO will decide whether or not they need to meet with you to further clarify the detail of your complaint, and/or for you to explain your understanding of events. There may also be a discussion about what supporting documents may need to be provided and who else the IO may need to interview.
- 5.4 The IO will write to the Councillor against whom the complaint has been made, providing them with a copy of the complaint (unless the right to anonymity has been agreed – see 2.4 above) and ask them to provide their explanation of the event(s), to suggest what other supporting documents may be required and who else the IO may wish to interview. If your complaint relates to a Town or Parish Councillor, the IO will also advise the Town/Parish Clerk.

- 5.5 At the end of the investigation, the IO will produce a draft report and provide copies for both you and the Subject Member to respond to within 14 days.
- 5.6 Both you and the Subject Member will be given the opportunity to comment on the draft report, and indicate agreement (or otherwise) with the content.
- 5.7 The IO will then send a copy of the report – having taken account of any comments from you and/or the Subject Member – to the Monitoring Officer for reviewing.
- 5.8 The Monitoring Officer will consult with an Independent Person to decide whether to:-
 - a) Take no action if there is clear evidence that there has been no breach of the Code of Conduct
 - b) Resolve the matter informally by asking the Subject Member to:-
 - i. take part in mediation with you in order to settle the complaint, providing both parties are willing to do so, and/or
 - ii. send a written apology to you, which is acceptable to the Monitoring Officer and the Chairman of the Standards Committee; and/or
 - iii. attend training, and/or
 - iv. correct an entry in the Register of Interests or correct a declaration made; OR
 - c) Progress to Stage 2 where the complaint is considered by the Assessment Panel

6 ASSESSMENT PANEL HEARING – STAGE 2 (If the Monitoring Officer and Independent Person support the complaint going forward)

- 6.1 The Assessment Panel will consist of 3 members of the Council's Standards Committee, plus an Independent Person.
- 6.2 The Monitoring Officer will also attend to present the report from the IO.
- 6.3 The Hearing will be called within a maximum period of 4 months from receipt of the complaint and the Panel will be selected from available Members of the Standards Committee. Councillors representing the ward where you live will not be permitted to sit on the Panel, nor will any Councillor who has any connection with the Subject Member.
- 6.4 Panel Members will be provided with copies of the original complaint, the IO report, any additional information or comments provided by you and/or the Subject Member, or statements from witnesses to the event.
- 6.5 Unless it is not practical, reasonable or is not likely to assist the Assessment Panel in its consideration of the Complaint, the Panel will follow the process outlined in Appendix 1.

- 6.6 Following the hearing and an agreed outcome being reached, the Panel shall prepare and sign a written decision for the Monitoring Officer to send to:
- the Subject Member
 - you
 - all Independent Persons (via a report to Standards Committee)
 - all District Councillors (via a report to Standards Committee)
 - all members of the Council's Senior Management Team (when the decision notice is published) where the complaint is about an Arun District Councillor
 - the Clerk and Chairman of the Town/Parish Council at the same time that the report is presented to the Standards Committee where the complaint is about a Town or Parish Councillor.
- 6.7 Separately, the Panel may provide the Monitoring Officer with any lessons to be learnt from the Complaint and any actions the Panel wish to suggest the Council to consider.
- 6.8 The Monitoring Officer shall publish the decision on the Council's website and that decision shall remain on the website for up to a period of 12 months unless the Standards Committee has requested a longer timeframe.
- 6.9 The Monitoring Officer shall place a report before the next meeting of the Standards Committee, for the Committee to ask questions about the decision of the Panel and discuss:
- any lessons learnt identified by the Panel
 - any actions the Panel has suggested the Council consider

and make any recommendations it feels are appropriate for Full Council to consider.

In order to avoid unnecessary printing of paper, generally the report will only include a summary of the Panel's decision and Councillors are requested to bring the full copy of the decision they have been sent, with them to the meeting of the Standards Committee and Full Council.

7 DECISION

7.1 The Panel can reach a finding of:

- (i) no breach of the Code of Conduct
- (ii) the Complaint relates to an offence under Section 34 Localism Act 2011 [Offences] and the Panel will refer the Complaint and all evidence the Council is aware of to the Police. Such offences arise from failure, without reasonable excuse, to disclose a Pecuniary Interest or participation in the debate and/or votes on a matter in which the Subject Member has a Pecuniary Interest and has not been granted a dispensation.
- (iii) a breach of the Code of Conduct that Arun District Council, or the relevant Town or Parish Council, is responsible for dealing with

- (iv) to take no action on the Complaint because, even though a breach of the Code of Conduct has occurred, the Panel is of the view that it would not serve the public interest to pursue the consideration of the Complaint
 - (v) to take no action on the Complaint because, the Subject Member is no longer a Councillor or co-opted Councillor of the Local Authority and the Panel is of the view that it would not serve the public interest to pursue the consideration of the Complaint (if the Councillor has resigned during the course of the investigation, the complaint would have been rejected at the initial assessment stage)
- 7.2 The Panel shall specify the period that its decision shall remain on Arun District Council's website, which shall be no longer than 12 months, unless the Standards Committee has carried out a further review and requested a longer timeframe.
- 7.3 Where the Panel is dealing with a Complaint against a Parish or Town Councillor or co-opted Councillor, and reaches a finding that the Subject Member has breached the Code of Conduct adopted by the Parish or Town Council, the Panel shall write to the Chairman and Clerk of that Parish or Town Council and inform them of its finding and request that the Parish or Town Council considers what action to take in relation to the Subject Member.
- 7.4 In order to assist the Parish or Town Council, the Panel may identify what action it would have taken had the Subject Member been an Arun District Councillor in breach of Arun District Council's Code of Conduct.
- 7.5 It is noted that, although Arun District Council is the 'relevant authority' and it may have regard to the Subject Member's failure when deciding what action to take, in practical terms Arun District Council cannot enforce that such action is taken and therefore it is for the Parish or Town Council to make a decision about what action to take and how to achieve compliance.
- 7.6 Arun District Council suggests to the Parish or Town Councils within its district that those Councils seek individual undertakings from each of their Councillors; that the Councillor agrees to abide by their responsibilities under the Localism Act 2011, the Parish or Town Council Code of Conduct and to comply with any consequential request made to the Member by the Parish or Town Council.

8 RIGHT OF REVIEW

- 8.1 If either you or the Subject Member considers the decision of the Panel was not fair, or proportionate, they can appeal by asking for a Review within 20 working days from the date of the covering letter sent to them with the Decision Notice, stating why they consider the Assessment Panel decision was not fair or proportionate.
- 8.2 The request must be in writing to the Monitoring Officer.

- 8.3 The Monitoring Officer will check the reasons given in the request for the Review and if those reasons are not clear the Monitoring Officer will contact the party requesting the Review and ask for clarification.
- 8.4 The Review will be referred to the Standards Committee for a decision via a report presented by the Monitoring Officer.
- 8.5 There are no further rights of appeal within the Council's Local Assessment Procedure.

9 PUBLICATION OF DECISION

- 9.1 As soon as reasonably practicable after the Panel have reached a decision, the Monitoring Officer will prepare a formal decision notice (in consultation with the Chairman of the Standards Committee) and send a copy to you, the Subject Member, and any Town or Parish Council concerned.
- 9.2 The Monitoring Officer will make the decision notice available for public inspection and report the decision to the next appropriate Standards Committee meeting.

APPENDIX 1 – ASSESSMENT PANEL HEARING PROCEDURES

Introductory Stage

1. Quorum of the Panel is three Elected Members, plus an Independent Person.
2. Hearings of the Panel will be held in closed session.
3. The Panel will elect a Chairman, who will be an Elected Member.
4. The Chairman will invite all attendees to introduce themselves.
5. The Chairman will explain the purpose of the Hearing and why it has been called.
6. The Monitoring Officer will outline the case and explain why they believe that the Subject Member has breached, or failed to follow, the Code of Conduct.

Assessment Stage 1 – the complainant

7. The Monitoring Officer will call the complainant, any other witnesses, and Investigating Officer into the hearing.
8. The Chairman will introduce those present and summarise the complaint and the process followed thus far, and the procedure for the Panel Hearing.
9. The complainant will explain why they feel that the Subject Member has breached/failed to follow the Code of Conduct.
10. The Panel Members may ask questions of the Monitoring Officer, Investigating Officer, complainant and any other witnesses.
11. The complainant and Monitoring Officer will be asked to give closing remarks.
12. The complainant and any other witnesses will leave the hearing to allow the Panel to continue their assessment.

Assessment Stage 2 – the Subject Member

13. The Monitoring Officer will call the Subject Member, any other witnesses, and the Investigatory Officer into the hearing.
14. The Chairman will introduce those present and summarise the complaint and the process followed thus far, and the procedure for the Panel Hearing.
15. The Subject Member will explain why they feel they have not breached/failed to follow the Code of Conduct.
16. The Monitoring Officer and Panel Members may ask questions of the Investigating Officer, Subject Member and their witnesses.

17. The Subject Member and Monitoring Officer will be asked to give closing remarks.
18. The Subject Member and any other witnesses will leave the hearing to allow the Panel to continue their assessment.

Decision Stage

19. The Independent Person will be invited to make comments.
20. The Panel will strive to reach a decision at that time, but may need further time to deliberate or seek further information.
21. If the Panel are able to conclude their deliberations on the day, the Chairman will call separately the complainant and then the Subject Member back into the room and announce the decision of the Panel.
22. If the Panel need further time to deliberate, they will agree a deadline and advise the complainant and the Subject Member of the decision in writing.
23. If the Panel decide that no breach has taken place, the hearing will close.
24. If the Panel decide that a breach has taken place, the Subject Member will be invited to comment on any mitigating circumstances.
25. The Monitoring Officer may comment on appropriate/suitable sanction.
26. The Independent Person will be invited to give further comment.
27. The Panel Members will consider an appropriate sanction.
28. The Chairman will advise separately the complainant and the Subject Member of the chosen sanction.
29. Panel Hearing closes.

Notes:-

- The Chairman has discretion to revise this procedure at a Hearing
- The Panel may proceed with the Hearing in the absence of the Subject Member and the complainant where no satisfactory explanation for their absence has been provided
- The Panel may adjourn the Hearing at any time

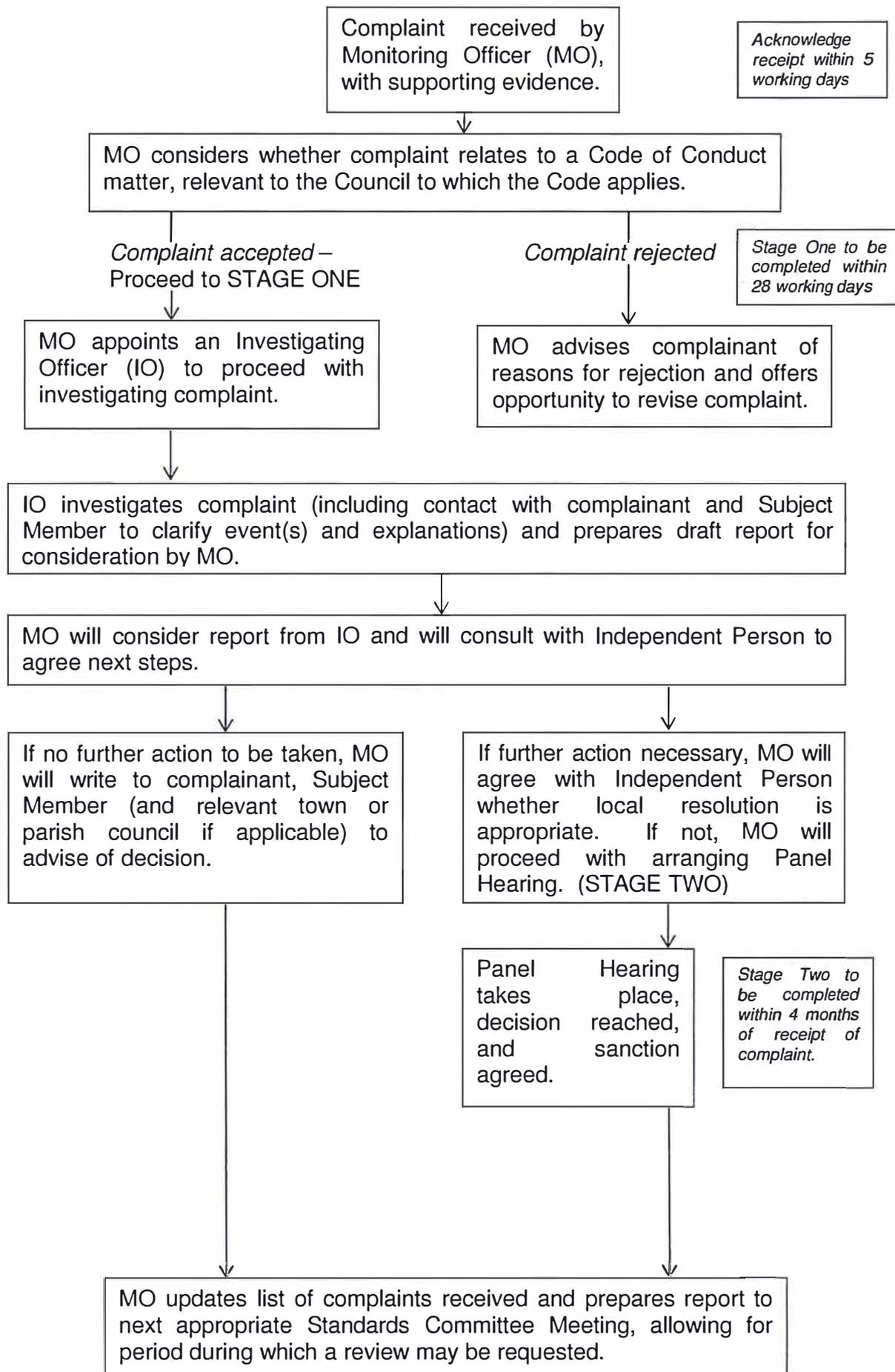
APPENDIX 2 – AVAILABLE SANCTIONS

The Panel may choose one or more of the following sanctions (or make recommendation of a sanction to the Town or Parish Council that the Subject Member represents):-

1. Censure or reprimand the Subject Member
2. Publish the findings in respect of the Subject Member's conduct
3. Report the findings to Council for information
4. Recommend to the Subject Member's Group Leader that he/she be removed from any or all Committees or Sub-Committees of the Council
5. Instruct the Monitoring Officer to arrange training for the Subject Member
6. Remove the Subject Member from all outside appointments to which he/she has been appointed or nominated by the Council
7. Withdraw facilities provided to the Subject Member, such as computer, website and/or email and internet access for an agreed period
8. Exclude the Subject Member from the Council's offices or other premises for an agreed period
9. Restrict the Subject Member's access to the Council's Officers for an agreed period
10. Recommend suitable training, mediation/conciliation be given
11. Accept a written apology from the Subject Member
12. Remind the Subject Member of the undertaking signed at the point of their election, in relation to the Members Code of Conduct (to comply with the Localism Act 2011)
13. Remind the Subject Member of the need to declare their pecuniary interests via the Register of Interests form – to be updated at regular intervals when requested or when circumstances alter – and at the beginning of any committee meeting where that interest relates to an Agenda item

The Panel has no power to suspend or disqualify the Subject Member.

APPENDIX 3 - PROCEDURE FLOWCHART



From: Liz Futcher [<mailto:Liz.Futcher@arun.gov.uk>]
Sent: 14 November 2017 16:36
To: Peter Herbert <pherbert@littlehampton-tc.gov.uk>
Cc: Juliet Harris <jharris@littlehampton-tc.gov.uk>; Cllr. Paul English <cllr.paul.english@arun.gov.uk>; Shirley Zeman <Shirley.Zeman@arun.gov.uk>
Subject: RE: Revised Members Code of Conduct - response please by 5 January 2018

Dear Peter

Thank you for your comments which I will aim to respond to in turn.

Firstly, I note your concern about a lack of consultation with Parishes in advance of producing the new Code and Local Assessment Procedure. Unfortunately this is due to timing and the wish of the Standards Committee that the new arrangements were introduced as soon as possible as this has been an outstanding request to my predecessor. In particular, the Committee has been concerned for some time about the length of time that an investigation took through the former Local Assessment Procedure and wanted to see this changed before the end of this year, which is the remit I have been working to.

Secondly, responding to your specific comments. The new Code and Local Assessment Procedure have been based on best practice that I identified through research and training. They took on board feedback from the Standards Committee on their review of these examples. Responding in turn,

- Code of Conduct
 - I note that that you feel there may be no benefit to LTC changing the Code - the Standards Committee are keen to see a common Code across Arun for the benefit of residents, however, as you say that will be for your Members to decide upon
- Local Assessment Procedure
 - Para 3.4 - Retaining complaints on file – this relates to where a councillor resigns post a complaint being made or during an investigation, not all complaints which will be kept in line with our document retention schedule for a maximum of 6 years. The Committee supported the best practice we had identified to include this, based on an example they were aware of within Arun. However, I note your concerns on this and it is one of the areas we can consider in the review planned after a year of operation.
 - Para 3.6 - The proposal to consult with the Town/Parish Council during the investigation is based on the best practice we viewed. From my review of Arun's existing procedure, this tended to be an action that the Investigatory Officer already took, hence why we included. We would of course be sensitive to any issues this caused a Parish Clerk or its councillors and we would consider cases individually where it would be inappropriate to take this action or to make public information provided from the investigation
 - Para 1.5 - The Local Assessment Procedure is based on a sign up to the Code of Conduct by all Arun's parishes, as requested by the Standards Committee. If not all sign up, then para 1.5 would be updated to reflect the arrangements that each Parish puts in place after the current review exercise is completed

- Training – many of the requirements of the new Code of Conduct are based on the former Code, and what Members included in their register of interests. The difference is that they are more explicit and the Code has been written to take the councillor through each step both in completing their register and then declaring interests at meetings. I am happy to come and speak to a Parish Council meeting, however, at this stage we had not envisaged the need for specific training based on how the Code has been written and that in my role I can be contacted for individual advice where a question is raised which is not covered by the wording of the Code and its appendices

I look forward to hearing back from you in the new year on the outcome of discussions by your Parish.

Best wishes

Liz

[Liz Futcher](#) | Group Head of Council Advice and Monitoring Officer, [Arun District Council](#) | Location: Second Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF
Internal: 37610 | External: +44 (0) 1903 737610 | E-mail: liz.futcher@arun.gov.uk

Visit Arun's web site at www.arun.gov.uk



Save the environment - think before you print.

From: Peter Herbert [<mailto:pherbert@littlehampton-tc.gov.uk>]

Sent: 14 November 2017 11:05

To: Liz Futcher

Cc: Juliet Harris

Subject: RE: Revised Members Code of Conduct - response please by 5 January 2018

Hi Liz

Thank you for this and it is good that ADC are now up to speed on this.

I do have to say that I am disappointed that Parishes were not consulted on this, prior to ADC adopting it.

We will take it to our February Governance and Audit Committee and then, if necessary to Council in March.

My initial comments would be that: -

- I am not sure that there is any benefit to LTC in changing our Code, but that is up to members.
- I am concerned about the legality of retaining complaints on file indefinitely in case a future complaint is lodged against that member if they return to office (para.3.4 refers)

- I am greatly concerned about para. 3.6, which has been included without any consultation with Clerks and ignores the problems that such a course of action could create in some parishes.
- I am concerned that the way that this has been drafted strongly implies that all parishes will have adopted this, notwithstanding para.1.5. This has already been adopted by ADC. How does it stand if we are content to remain as we are? I am not sure why the parishes have been included in ADC's Code. No parish, that I am aware of, has signed up to this new Code.
- How are you envisaging, in your role as our MO, rolling out training to parish members. This needs to be in place from the commencement of the Code.

I hope these comments are helpful and will come back to you next year when we have looked at this at Committee.

Best wishes

From: Liz Fitcher [<mailto:Liz.Fitcher@arun.gov.uk>]

Sent: 10 November 2017 08:55

To: Aldingbourne Parish Council <aldingbourneparishcouncil@gmail.com>; Aldwick Parish Council <clerk@aldwickparishcouncil.gov.uk>; Angmering Parish Council <admin@angmering-pc.gov.uk>; Arundel Town Council <admin@arundeltowncouncil.gov.uk>; Barnham Parish Council <barnhamparish@hotmail.co.uk>; Bersted Parish Council <clerk@bersted-pc.gov.uk>; Bognor Regis Town Council <Bognortc@bognorregis.gov.uk>; Burpham Parish Council <paul@pchallen.co.uk>; Clapham Parish Council <claphamclerk@gmail.com>; Clymping Parish Council <clympingpc@gmail.com>; East Preston Parish Council <epparishcouncil@btconnect.com>; Eastergate Parish Council <g.sleet@btinternet.com>; Felpham Parish Council <clerk@felphampc.gov.uk>; Ferring Parish Council <ferring-pc@btconnect.com>; Findon Parish Council <findonparishcouncil@gmail.com>; Ford Parish Council <fordparishcouncil@hotmail.com>; Kingston Parish Council <kingstonpc@tesco.net>; LTC <LTC@littlehampton-tc.gov.uk>; Lyminster & Crossbush Parish Council <paul.burzio@btinternet.com>; Middleton Parish Council <mospc@btconnect.com>; Pagham Parish Council <paghampc@gmail.com>; Patching Parish Council <patchingpc@gmail.com>; Poling Parish Meeting <bryan.curtis@hotmail.co.uk>; Rustington Parish Council <caroleward@rustingtonpc.org>; Slindon Parish Council <clerk@slindonparishcouncil.gov.uk>; Walberton Parish Council <clerk@walbertonpc.org.uk>; Warningcamp Parish Meeting <archie.naughton@gmail.com>; Yapton Parish Council <clerk@yaptonpc.gov.uk>

Cc: Cllr. Paul English <cldr.paul.english@arun.gov.uk>; Nigel Lynn <Nigel.Lynn@arun.gov.uk>; Shirley Zeman <Shirley.Zeman@arun.gov.uk>; Louise Greene <Louise.Greene@arun.gov.uk>

Subject: Revised Members Code of Conduct - response please by 5 January 2018

Dear Clerk

You may be aware that Arun District Council adopted a new Code of Conduct on 8 November 2017. This re-drafted Code does not alter the principles of the Code, nor the expectations of general conduct that the majority of your councils have already signed up to. What has changed is the addition of specific direction and guidance to support Councillors in completing their Register of Interests and making declarations at meetings. It sets out the requirements for:

- i. disclosable pecuniary interests;

- ii. personal interests;
- iii. prejudicial interests; and
- iv. sensitive interests.

It also covers exempt categories and the criminal sanctions that apply for failure to disclose a pecuniary interest.

I know that all of your councils, with the exception of Bognor Regis and Littlehampton, adopted the previous Code following its approval in June 2012. I am therefore writing to seek your support to adopting this re-drafted Code so that all of the parish and town councils within the Arun District will have signed up to the same principles and guidance.

The benefits of this are firstly to the residents of the District. It will make it simpler to offer advice and explain expectations about the conduct of Councillors whether this be at meetings or out in the local community. Secondly, it will aid the work of the Standards Committee by all local assessments being based on a single Code of Conduct that all Councillors in Arun would have signed up to.

I attach a copy of the new Code for you to consider and discuss with your Councillors. If adopted, then your councillors would all be required to sign up to the new Code and to update their Register of Interests within 28 days of the Code being adopted. We would provide template forms to support this.

I very much hope I can rely on your support in encouraging the adoption of the new Code of Conduct by your council. Please can you keep Liz Futcher updated on the decision of your parish council. A response by 5 January 2018 would be appreciated.

Whilst writing, I also wanted to draw your attention to the revised Local Assessment Procedure for dealing with Code of Conduct complaints that has been developed by the Standards Committee and was approved by Arun District Council on 8 November 2017. This has introduced a two stage review process with the aim of speeding up the response times to investigate complaints; whilst recognising that not all cases will need to proceed to full assessment. This will be implemented with immediate effect and again I would ask your support in making your Councillors aware of the new arrangements.

If you need any further help or have any questions on the new Code or Local Assessment Procedure, please do not hesitate to contact Liz Futcher, the Group Head of Council Advice & Monitoring Officer or myself on:

Liz Futcher

Email liz.futcher@arun.gov.uk

Tel 01903 737610

Councillor Paul English

Email cllr.paul.english@arun.gov.uk

LITTLEHAMPTON TOWN COUNCIL

Non- Confidential

Committee: Governance and Audit

Date: 6th February 2018

Report by: The Town Clerk

Subject: Internal Audit Report 2017/18

1. Summary

- 1.1 Attached, as Appendix 1 is the first Internal Audit Report for Littlehampton Town Council for the financial year 2017/18. The audit was conducted by Town Council's independent Internal Auditor, Mulberry & Co.
- 1.2 One of the functions of Internal Audit is to give assurance to Members of the Council that the systems, financial and otherwise, are following best practice, operating correctly, compliant with all laws and regulations and can be relied upon.

2. Recommendations

The Committee is RECOMMENDED to

- (1) note the interim Internal Audit report for the year ending 31st March 2018.

3. Background

- 3.1 The Internal Auditor makes 2 visits per year. This is the first report for 2017/18. The areas that were audited were

- Review of the Financial Regulations & Standing orders
- Review of the Risk Assessments
- Review of the Budgeting process
- Proper Bookkeeping

Items to be brought to the Committees attention are:

3.2 Financial Regulations

- 3.2.1 The auditor identified two minor recommendations, as follows:

1. The Council's ICT support contract is due for retender. It was originally let in 2014, and I recommend that competitive quotes be obtained every three years for a contract of this nature.

2. The Council is intending to move to internet banking for the start of the 2018/19 financial year. It is important that the financial regulations relating to processing of payments are reviewed prior to this to ensure they are fit for purpose.

- 3.2.2 The ICT support contract will go out to tender in 2018. The Council's Procurement Policy will be reviewed in light of this recommendation.
- 3.2.3 It was agreed by this committee on 11th July 2017 to carry out research into electronic payment systems during 2018-19. The auditor's recommendation will feed into that research.
- 3.3 Risk Management and Insurance
- 3.3.1 The auditor viewed the Council's insurance policy and observed that the money cover is set at £1million, which appears too low given the Council's year end cash balance of £2.7million. *I have suggested that the RFO should contact the insurer to see if increased cover is necessary.*
- 3.3.2 The RFO is due to meet with the insurance provider regarding the cover required and will complete a risk assessment.
- 3.3.3 The auditor noted that the Council has a well-established process for backing up computer data, with backups held at remote location. *It is recommended that these backups be tested on at least an annual basis, to ensure all essential data/systems can be restarted if required.*
- 3.3.4 The RFO will arrange for a backup test following completion of the new server installation.

4. Conclusion and Opinion

- 4.1 The systems and internal procedures at Littlehampton Town Council are very well established, regulated and followed. The RFO ensures the Council follows best practice regulations and has over time adapted and changed the internal procedures as regulations and technologies have changed to maintain compliance.
- 4.2 It is clear the Council takes policies and procedures very seriously and the systems and procedures in place are fit for purpose.

Peter Herbert
Town Clerk



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Registered Auditors
& Chartered Tax Advisors

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w www.mulberryandco.co.uk

Our Ref: MARK/LIT003

Mr P Herbert
Littlehampton Town Council
Manor House
Church Street
Littlehampton
West Sussex
BN17 5EW

15th November 2017

Dear Peter

**Re: Littlehampton Town Council
Internal Audit Year Ended 31st March 2018**

Following completion of our interim internal audit we enclose our report for your kind attention and presentation to the Council. The audit was conducted in accordance with current practices and guidelines and testing was risk based. Whilst we have not tested all transactions, our samples have where appropriate covered the entire year to date. Where appropriate recommendations for future action are shown in bold text.

Interim Audit – Summary Findings

At the interim visit we reviewed and performed tests on the following areas:

- Review of the Financial Regulations & Standing Orders
- Review of the Risk Assessments
- Review of the Budgeting Process
- Proper Bookkeeping

It is our opinion that the systems and internal procedures at Littlehampton Town Council are very well established, regulated and followed. The Responsible Finance Officer (RFO) ensures the Council follows best practice regulations and has over time adapted and changed the internal procedures as regulations and technologies have changed to maintain compliance.

It is clear the Council takes policies and procedures very seriously and I am pleased to report that overall the systems and procedures you have in place are fit for purpose. I have identified a small number of recommendations for consideration by the Council. These are set out at Appendix A.

The results of my interim audit can be seen below. I have set out the results of my testing against each of the control objectives set out in the internal audit section of the annual return.

A. Books of Account

The Council continues to use RBS an industry specific accounting package. I have tested the brought forward balances against the audited prior year annual return and can confirm these have been brought forward correctly.

The RBS system is used daily to report and record the financial transactions of the Council, it is used to make bookings for hires, allotments, and fixed asset register recording. A review of the cashbook shows that all data fields are being entered, the hard copy reports are easy to read and logically filed. I therefore make no recommendation to change in this system.

The council also uses Sage 50 payroll, this is automatically updated for changes in legislation and the primary user has been given appropriate training.

I have confirmed that the Council's VAT returns are up to date, with the most recent claim for the 3 months to 30 September 2017 submitted to HMRC. I checked that balances in the return could be agreed to schedules produced by the accounting system.

The Council has loaded the signed accounts and audit certificate for the 2016-17 financial year to its website, as required by regulations. I also confirmed that both internal and external audit reports for 2016-17 were taken to a meeting of the Full Council and the review of these reports properly noted in minutes.

I have no recommendations in this area.

B. Financial Regulations & Payments

The Council's financial regulations and standing orders were last taken to Council in February 2017. These are currently under review, and will be reviewed at Governance and Audit Committee in February 2018, with Full Council approval due in March 2018. **I have reminded the RFO that these documents need to be reviewed at Full Council by the end of the financial year.**

I have confirmed by sample testing that the Council has a clear process to ensure all members sign acceptance of office forms. Forms were in place for all Councillors selected, and were signed and dated by the councillor and the Town Clerk.

Council is given authority to spend via the annual budget process. The Council has a strong procedure in place to ensure that all expenditure is authorised in line with financial regulations. I selected a sample of transactions from the ledger and I was able to confirm that:

- Where appropriate, authorised order forms were in place
- Transactions could be agreed back to invoice
- Payment approval slip was on file, authorised by appropriate officers, with evidence of councillor sign off
- Payment approved at a meeting of the Council
- VAT accounted for appropriately.

I can confirm that the Council is compliant with the 2015 Transparency Code. Information is disclosed in the "Littlehampton Town Council Finance" section of the website, and regular information on payments, fixed assets, grants and staffing is loaded to the website.

I have two minor recommendations

- 1. The Council's ICT support contract is due for retender. It was originally let in 2014, and I recommend that competitive quotes should be obtained every three years for a contract of this nature**
- 2. The Council is intending to move to internet banking for the start of the 2018-19 financial year. It is important that the financial regulations relating to processing of payments are reviewed prior to this to ensure they are fit for purpose.**

C. Risk Management & Insurance

The Council has a risk strategy in place and monitors and reviews risk on an ongoing basis. The RFO has confirmed that this will be formally reviewed at the February Governance and Audit Committee with Full Council sign off at the March 2018 meeting. I will review the approved risk assessment at my year end visit.

The Council is in year one of a 3 year deal with Zurich insurance. I have viewed the insurance policy and can confirm it is valid until September 2018. Money cover is set at £1million. This appears too low, given the Council's year end cash balance of £2.7 million. **I have suggested that the RFO should contact the insurer to see if increased cover is necessary.** Buildings cover appears adequate and there is evidence that this was reviewed when the policy was renewed.

The Council has a well-established process for backing up computer data, with backups held at remote locations. **It is recommended that these backups are tested on at least an annual basis, to ensure all essential data / systems can be restarted if required.**

D. Budget, Precept & Reserves

The council is the process of preparing the budgets for 2018/19. It is anticipated that the budget will pass through the committee cycle by the end of December, with Full Council approval of the budget and precept due in January 2018. All precepting authority deadlines will therefore be met.

I have confirmed that regular budget monitoring reports are issued to committees in line with financial regulations.

Current projections suggest that the Council will hold reserves as follows at 31.3.18:

Reserve	Projected balance 31.3.18
Capital Receipts Reserve	£1.575m
Earmarked Reserves	£0.753m
General Fund	£0.175m
Total	£2.503m

General fund reserve is £175K, which represents around 2 months' expenditure. There are specific earmarked reserves in place to cover revenue expenditure on areas such as vehicle and building maintenance / elections and legal expenses. Levels of reserves therefore appear adequate.

The Council is correctly holding land sales receipts in a separate reserve until suitable capital schemes are identified. I have no recommendations in this area.

E. Income

I carried out a small sample test of non precept income. For all items sampled I was able to agree credit in the cashbook back to an appropriate voucher (grant notification / invoice for car parking).

Precept will be tested at year end.

F. Petty Cash

The Council holds £250 in petty cash. All expenditure is recorded on a spreadsheet, and is counted periodically, depending on activity levels. . Cash count is reconciled to the spreadsheet at each count. Detailed receipts are

kept to support transactions, and the finance team review records periodically to ensure that expenditure incurred using petty cash is reasonable.

G. Payroll

The Council processes the payroll in house using Sage 50 payroll. The RFO inputs all payroll changes and expense claims each month. The payroll is processed and a telepay document is produced and faxed to the bank –payments are made electronically to staff.

I tested the August 2017 payroll in detail. I was able to confirm the payroll posted to the general ledger back to the telepay document that had been authorised by the clerk and by the RFO. I then agreed pay for two officers back to payslips, Rates of pay were checked. The Council has satisfactory controls over payroll.

H. Assets and Investments

The Council has a fixed asset register in place, this is entirely adequate for a council of this size. Detailed testing of fixed assets will be carried out at year end.

I. Bank Reconciliations

Reconciliations for all bank accounts are carried out regularly and in accordance with regulations. This is clearly evidenced in the Council's bank reconciliation file. The September 2017 bank reconciliation was tested in detail. I confirmed the following.

- The face of the bank statements and the bank reconciliations had been signed off by the reviewing councillor
- All balances on the bank reconciliation were agreed back to bank statements / cashbooks
- Cashbook /bank statement differences were explained by schedules of unpresented cheques / lodgments. Testing of these items to subsequent clearance through the bank account confirmed these adjusting items to be genuine.
- Bank reconciliations were reported to a meeting of the Council, and this review was minuted.

I have no recommendations in this area.

J. Year end accounts

Will be tested at year end

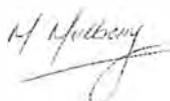
K. Trusteeship

No trusts.

Should you have any queries please do not hesitate to contact me.

Kind regards

Yours sincerely



Mark Mulberry

Appendix 1 Points Forward – Action Plan

Matter Arising	Recommendation	Council Response
The Council's ICT support contract is due for retender.	It was originally let in 2014, and I recommend that competitive quotes should be obtained every three years for a contract of this nature	
The Council is intending to move to internet banking for the start of the 2018-19 financial year.	It is important that the financial regulations relating to processing of payments are reviewed prior to this to ensure they are fit for purpose.	
Money cover is set at £1million. This appears too low, given the Council's cash balance of £2.7 million	I have suggested that the RFO should contact the insurer to see increased cover is necessary	
The Council has a well-established process for backing up computer data, with back ups held at remote locations	It is recommended that these backups are tested on at least an annual basis, to ensure all essential data / systems can be restarted if required.	

LITTLEHAMPTON TOWN COUNCIL

Non-Confidential

Committee: Governance and Audit

Date: 6th February 2018

Report by: The Town Clerk

Subject: Annual Review of Internal Controls

1. Summary

- 1.1 Attached as Appendix 1 to this report is a list of the Councils' Internal Controls for the Committee's consideration and approval.

2. Recommendation

The Committee is RECOMMENDED

- (1) to review, comment upon and approve the Councils Internal Control system.
- (2) To Recommend to Council that Statements 2,5,6 and 7 of the Annual Governance Statement have been complied with.

3. Background

- 3.1 Local Councils are responsible for putting in place proper arrangements for the governance of their affairs and the stewardship of their resources. Part of good governance is the annual review of the Town Councils Internal Controls including measures designed to prevent and detect fraud and corruption.
- 3.2 Part of this process is performed by the Internal Auditor who performs tests to check the effectiveness of the Internal Controls.

Annual Governance Statement

Councils are expected to make a number of representations and assertions in eight statements of assurance, which together comprise the Annual Governance Statement, about the accountability of the Council. The following statements appertain to this report. This Committees review of the Internal Controls gives Council the assurance required to approve the Annual Governance Statement in June.

Statement	Explanatory note
2. 'We maintained an adequate system of internal control, including measures designed to prevent and detect fraud and corruption and reviewed its effectiveness.'	This statement covers the Council's responsibility to ensure that its affairs are managed in accordance with proper standards of financial conduct and arrangements exist to prevent and detect fraud and corruption. The Council also asserts that it has tested those arrangements at least once in the year to make sure they are working in an adequate and effective way.
5. 'We carried out an assessment of the risks facing the Council and took appropriate steps to manage those risks, including the introduction of internal controls and/or external insurance cover where required.' 6. 'We maintained throughout the year an adequate and effective system of Internal Audit of the Council's accounting records and control systems.' 7. 'We have taken appropriate action on all matters raised in reports from internal and external audit.'	These representations cover the Council's responsibility to develop, implement and regularly monitor the effectiveness of systems of internal control covering: <ul style="list-style-type: none">• the overall control environment, including internal audit;• the identification, evaluation and management of operational and financial risks;• budgetary control and monitoring arrangements; and• the documentation and application of control procedures.

LITTLEHAMPTON TOWN COUNCIL	
INTERNAL CONTROLS	
INTERNAL CONTROL	RESPONSIBILITY
<u>Minutes</u>	
CHECK QUORUM PRESENT FOR EACH FULL COUNCIL MEETING	CLERK TO MEETING
CHECK MINUTES PROPERLY SIGNED	CLERK TO MEETING
PAGES IN MINUTE BOOKS SEQUENTIALLY NUMBERED	CLERK TO MEETING
<u>Assets & Investments</u>	
<u>1. Assets</u>	
REGISTER OF ALL COUNCIL ASSETS	RFO
ASSET REGISTER AS PER FINAL ACCOUNTS & ANNUAL RETURN	RFO
<u>2. Investments</u>	
CHAIR P & F TO CHECK MONTHLY WITH BANK RECONCILIATION	CHAIR OF P & F
<u>Income</u>	
<u>1. Cash</u>	
CASH BANKED FREQUENTLY AT LEAST TWICE PER WEEK	RFO/FA
<u>2. Credit Income</u>	
CHECK BOOKINGS MATCH INVOICING	RFO/FA
<u>3. Credit Control</u>	
CHECK DEBTOR BALANCES MONTHLY- FA & RFO	RFO/FA
RFO TO REVIEW METHOD OF CHASING DEBTS- MONTHLY	RFO/FA
<u>4. Bad Debts</u>	
REVIEW REASONS FOR NON PAYMENTS	RFO
CHECK ALL REASONABLE STEPS TAKEN TO COLLECT DEBTS	RFO
P & F AUTHORITY OBTAINED FOR BAD DEBTS WRITTEN OFF	TC/RFO

INTERNAL CONTROL	RESPONSIBILITY
<u>Cash & Bank</u>	
<u>1. Receipt of Money</u>	
CASH REMOVED FROM TILL TO SAFE OVER NIGHT	RECEPTIONIST/ MUSEUM
LOCKED TILL	RECEPTIONIST/ MUSEUM
2 FIRE PROOF SAFES	TC/RFO
ALL CASH KEPT IN LOCKED SAFE OR TILL	RFO
ALL CASH RECONCILED TO ACCOUNTS	RFO
<u>2. Bank Reconciliation</u>	
PERFORMED AT LEAST ON A MONTHLY BASIS AND ALL BANK ACCOUNTS AGREED	RFO/FA
RFO CHECK & ENSURE NO PAYMENTS OR RECEIPTS ARE BEING C/F FOR A NO. OF MONTHS	RFO
CHAIR OF P&F TO CHECK & SIGN MONTHLY WITH CORRESPONDING BANK STATEMENTS	RFO/ CHAIR P & F
REVIEW CHEQUES OUTSTANDING FOR OVER 6 MONTHS AND ENSURE WRITTEN OFF	RFO

INTERNAL CONTROL	RESPONSIBILITY
Payments	
<u>1. Payments</u>	
PURCHASE ORDERS RAISED FOR ALL PURCHASES	STAFF/ RFO/FA
PURCHASE ORDER BOOKS KEPT SECURELY AND SIGNED OUT TO SPECIFIC STAFF MEMBERS	RFO/FA
PURCHASE ORDERS AUTHORISED BY LIMITED OFFICERS	COUNCIL/ STANDING ORDERS
RFO AUTHORIZES ALL INVOICE PAYMENTS (TC/ATC IN ABSENCE)	RFO
ORDER & AUTHORISE FOR PAYMENT ON INVOICE SEPARATE OFFICERS	RFO/FA
RFO NOT TO SIGN ORDERS UNLESS NO OTHER AUTHORISED MEMBER OF STAFF AVAILABLE- IF SO TC OR ATC TO AUTHORISE PAYMENT	RFO
ORDERS & DELIVERY NOTES CHECKED AGAINST INVOICE AND ATTACHED TO BACK	RFO/FA
CONTROL COPY OF ORDER KEPT IN SEPARATE FILE	FA
2/5 AUTHORISED COUNCILLOR SIGNATORIES	STANDING ORDERS
PAYMENT SCHEDULE PRESENTED WITH CHEQUES TO TC & AUTHORISED COUNCILLOR SIGNATORIES	FA
PAYMENT SCHEDULE SIGNED BY TC & AUTHORISED SIGNATORIES	RFO/FA
SECURITY OF CHEQUES - STORED IN LOCKED CUPBOARD	RFO/FA
CHEQUES REVIEWED & INITIALLED BY TOWN CLERK	TC/RFO/FA
<u>2. Petty Cash</u>	
EXAMINE PETTY CASH EXPENSES AND CHECK BALANCES	RFO
CHECK VAT IS APPROPRIATELY CLAIMED ON PETTY CASH RECEIPTS	RFO
CHECK SYSTEM IN PLACE RATHER THAN AD HOC REIMBURSEMENT	RFO
HOLD £10 OF PETTY CASH IN SEPARATE TIN FOR REFRESHMENT PURCHASES ACCESSED BY TC/ATC/RFO/FA/PA TO TC	RFO
CHECK FREQUENCY OF RECONCILIATION	RFO
CHECK APPROVAL OF RECEIPTS & REIMBURSEMENTS	RFO
<u>3. Credit Card payments</u>	
CARD KEPT IN SAFE	RFO
MAX £350 WITHOUT COUNCILLOR APPROVAL	STANDING ORDERS
TC TO SIGN PURCHASE ORDER	TC/FA
RFO TO SIGN CC FORM	RFO
COUNCILLORS TO SIGN STATEMENT	RFO/FA

INTERNAL CONTROL	RESPONSIBILITY
<u>Payroll</u>	
PREPARE CONTRACTS OF EMPLOYMENT FOR ALL STAFF	RFO/ PA to TC
CHECK REFERENCES FOR NEW STAFF	RFO/ PA to TC
CHECK GROSS PAY FOR EACH EMPLOYEE IS AT CORRECT RATE	RFO
CHECK SICK LEAVE/PAY AGAINST REPORTING MECHANISM & TIMESHEETS	RFO/ PA to TC
CHECK ANNUAL LEAVE/PAY AGAINST REPORTING LEAVE CARDS & TIMESHEETS	RFO/ PA to TC
CHECK ANY STATUTORY SICK PAY OR MATERNITY PAY DEDUCTIONS	RFO
TC APPROVAL FOR NEW STARTERS	TC/RFO
PROMPT REMOVAL OF LEAVERS- FROM PAYROLL SYSTEM	RFO
TC TO COUNTERSIGN TELEPAY AND LIST OF PAYMENT MADE	TC/RFO
INTERNAL AUDIT TO AUDIT ANNUALLY	RFO
LINE MANAGER AUTHORISES ALL OVERTIME & MILEAGE COUNTERSIGNED BY TC	TC/RFO/LINE MANAGERS
<u>Supplier Invoices</u>	
CHECK PURCHASE ORDERS & DELIVERY NOTES MATCH INVOICES	FA
CHECK PURCHASE ORDERS AUTHORISATION	FA
CHECK UNMATCHED PURCHASE ORDERS	FA
CHECK EXPENDITURE CODING- CORRECT BUDGET HEAD & COST CENTRE	RFO
CHECK AUTHORISATION FOR PAYMENT OF INVOICE	FA
ENSURE SUPPLIER STATEMENTS CHECKED AGAINST PURCHASE INVOICE RECORDS	FA
CHECK ANY OLD CREDITORS & ASCERTAIN WHY STILL UNPAID	RFO
<u>General</u>	
CHECK TRIAL BALANCE MONTHLY	RFO
AT LEAST TWICE EACH FINANCIAL- CHECK ACTUAL EXPENDITURE AGAINST ESTIMATES & INVESTIGATE ANY OVERSPENDS	RFO
FIN. ASSISTANT TO PREPARE FIGURES RFO TO CHECK & SUBMIT VAT RETURN	RFO/FA
CHECK REGULAR REPORTING OF EXPENDITURE AND VARIANCES FROM BUDGET	RFO
MONTHLY CHECKING OF ALL TRANSACTIONS FOR CORRECT CODING	RFO

LITTLEHAMPTON TOWN COUNCIL

Non-Confidential

Committee: Governance and Audit

Date: 6th February 2018

Report by: The Town Clerk

Subject: Annual Review of Corporate Risk Register

1. Summary

- 1.1 For the Committee's consideration and approval, attached as Appendices 1 and 2 to this report are the Councils' Corporate Risk Management Strategy and Procedure. The Strategy and Procedure are also included to aid the Committee's understanding of the Risk Management Process.
- 1.2 For the Committee's consideration and approval, attached as Appendix 3 and 4 are the Council's Corporate Risk Register and the Risk Register relating to the Councils Strategic policies.

2. Recommendation

The Committee is RECOMMENDED to:

- (1) Review, comment upon and approve the Councils Corporate Risk Management Strategy and Procedure.
- (2) Consider and comment upon the updated Risk Registers, and, if satisfied recommend them to Full Council for approval.

3. Background

- 3.1 Local Councils are responsible for putting in place proper arrangements for the governance of their affairs and the stewardship of their resources. Part of good governance is the annual review of the Town Councils Corporate Risk Assessment.
- 3.2 Risk management is the process whereby Councils methodically address the risks associated with what they do and the services which they provide. Identifying things that could go wrong and taking proportionate steps to avoid this or manage the consequences.
- 3.3 Members are ultimately responsible for risk management because risk threatens the achievement of policy objectives. The Governance & Accountability in Local Councils therefore recommends that once per year Members should
 - Take steps to identify and update their record of key risks facing the Council

- Evaluate the potential consequences for the Council if an event is identified as a risk, takes place
 - Decide upon appropriate measures to avoid, reduce or control the risk or its consequences, and
 - Record any conclusion or decisions reached.
- 3.4 The Councils' Corporate Risk Management Strategy and Procedure are attached as Appendix 1 and 2. These have been reviewed and approved by the Town Clerk and DTC & RFO and no amendments have been made.
- 3.5 Members are asked to review, comment upon and approve the Councils' Corporate Risk Management Strategy and Procedure.
- 3.6 The Councils' Risk Registers are attached as Appendix 3 and 4. Appendix 4 shows the risks of not achieving the Council's Strategic Policies. The risks have been reviewed and updated by the Council's Senior Officers and approved by the Town Clerk and DTC & RFO.
- 3.7 Attention is drawn to three key areas of change: Project 82 is now Youth Services and has been revised to reflect the agreement with Arun Community Church; General Data Protection Regulation has been added as a new risk area with a rating to reflect the control measures that need to be put into place by 25th May 2018; a new risk area for events (called Entertainment and the Arts) has been added.
- 3.8 Members are asked to consider and comment upon the updated Risk Registers, and, if satisfied recommend them to Full Council for approval.

4. Annual Governance Statement

- 4.1 Councils are expected to make a number of representations and assertions in eight statements of assurance, which together comprise the Annual Governance Statement, about the accountability of the Council. The following statements appertain to this report. This Committees review of the Risk registers gives Council the assurance required to approve the Annual Governance Statement in June.

Statement	Explanatory note
<p>5. 'We carried out an assessment of the risks facing this smaller authority and took appropriate steps to manage those risks, including the introduction of internal controls and/or external insurance cover where required.'</p> <p>6. 'We maintained throughout the year an adequate and effective system of Internal Audit of the</p>	<p>These representations cover the Council's responsibility to develop, implement and regularly monitor the effectiveness of systems of internal control covering:</p> <ul style="list-style-type: none"> • the overall control environment, including internal audit; • the identification, evaluation and management of operational and financial risks; • budgetary control and monitoring arrangements; and

Statement	Explanatory note
Council's accounting records and control systems.'	<ul style="list-style-type: none">• the documentation and application of control procedures.

Peter Herbert
Town Clerk

Littlehampton Town Council

Corporate Risk Management Strategy

1. Introduction

Corporate Risk Management (CRM) is defined as the threat that an event or action will adversely affect the Council's ability to achieve its objectives or to successfully execute its strategies. Risk management is about an organisation's ability to consider and manage risks to help it deliver its goals.

CRM is a corporate and systematic process evaluating and addressing the impact of risks in a cost effective way and ensuring that all decision makers have the appropriate skills to identify and assess the potential for risks to arise and direct action as appropriate, all in a timely manner.

The definition recognises that risk is ever present and is not in itself a negative factor. The consideration of whether an event or action will present a substantive risk is the key. CRM can inform the decision-making process and stimulate and generate development of new opportunities, and ensure that where opportunities do arise they are responded to appropriately.

"If a council doesn't have effective risk management then it doesn't have effective management. That is because risk management is about making the right decisions and about achieving objectives once those decisions have been made. In short, risk management can ensure best value is achieved" – SOLACE (Society of Local Authority Chief Executives).

A risk is anything that could prevent the achievement of The Council's objectives. However failure to act upon opportunities which present themselves could also prevent the successful or timely achievement of The Council's objectives. Hence CRM is about managing opportunities (by maximising these) and risks (by minimising these), in a formal, transparent and effective manner such that it adds value to the Council.

The Council is aware that some risks will always exist and will never be eliminated. It acknowledges that it has a responsibility to manage hazards and risks and supports a structured and focused approach to managing them by approval of the following risk management strategy. In this way the Council will better achieve its corporate objectives and enhance the value of services it provides to the community.

2. Objectives of Risk Management

The objective of CRM is the identification, evaluation, control and review of threats and opportunities to all activities of the Council which can affect the achievement of its aims and objectives at all levels.

CRM enhances the likelihood of achieving successful outcomes whilst reducing the probability of failure and the uncertainty of achieving aims and objectives.

CRM is often incorrectly viewed as a burden on employees. However, when applied correctly, risk management assists employees and services, and hence the Council, to achieve stated objectives, whilst protecting staff, assets and resources against risk.

Littlehampton Town Council's CRM objectives are to:

- Identify, evaluate and manage the opportunities and risks to which the Authority is exposed, at all levels
- Enable effective delivery of services to local people and to minimise the risk of significant service failures
- Integrate risk management into the culture of the council
- Ensure appropriate risk taking is encouraged
- Anticipate and respond to changing social, environmental and legislative needs as well as changes in the internal environment
- Manage risk in accordance with best practice
- Minimise injury, damage and losses
- Raise awareness of the need for risk management by all those connected with the council's delivery of services
- Enable better, more informed decision making at all levels within the Council
- Embed risk management into day to day management and working arrangements
- Protect physical assets, promote employee and public safety and maximise resources
- Learn from risk failures to improve the systems of internal control and risk management
- Promote good corporate governance and therefore contribute to the annual assurance statement incorporating the statement on internal control.

It is the responsibility of all Members and employees to have regard for risk management whilst carrying out their duties. Unchecked risks can result in a drain on resources that could better be directed to front line service provision and to meeting the Council's objectives.

This strategy enables risks and opportunities to be identified, evaluated, controlled, monitored and reported. The process applies equally to both strategic and operational risks and is integrated into the business planning process.

The objectives will be achieved by:

- Establishing clear roles, responsibilities and reporting lines within the Council for risk management
- Maintaining a strategic risk register
- Ensuring that risk management is explicitly considered in all decision making by requiring inclusion in all formal decision reports identifying the risks

associated with the action proposed and the arrangement being put in place to manage these risks.

- Reinforcing the importance of effective risk management as part of the everyday work of employees by offering training
- Carrying out regular risk assessments and monitoring arrangements on an on-going basis.

Littlehampton Town Council

Corporate Risk Management Procedure

1. IDENTIFYING THE RISK

Main Risk categories

- People
- Delivery of Services
- Reputation and Democratic Representation
- Financial
- Statutory/legal
- Fixed Assets
- IT and data
- General Public

Risks or barriers to achieving Corporate Objectives should be identified. Strategic risks to which the Council is exposed should be recorded in the Corporate Risk Register. Appendix 1 lists the different types of risk.

Risks are identified through:

Cause	- Identifying the hazards
Effect	- Identifying the possible consequences of the cause
Impact Rating	- Anticipating the significance of the risk

2. EVALUATING THE RISK

The Impact Rating based on the Health and Safety Executive's approach is as follows: Also see Appendix 2.

Likelihood

High For example - is a daily activity, is out of Town Council control or there is a history of events.

Medium

Low For example – is a rare event or the hazard is secure with little to no danger.

Impact

High For example - will cause death, cause financial loss over £10,000, break the law, is fraudulent or would cease Town Council functions

Medium

Low For example - the dangers are low or it would have little to no effect on Council services.

Potential areas of risk which have been identified are then analysed using the Risk Matrix below to give an assessment of the likelihood of a risk materialising and the impact it would have on the Council. The action for each Risk should be prioritised according to the Risk Value, as follows:

RISK MATRIX

	High	3	3	6	9
Impact	Medium	2	2	4	6
	Low	1	1	2	3
			1 Low	2 Medium	3 High
			Likelihood		

The Risk Value is calculated by multiplying the Impact score by the Likelihood score. Both Impact and Likelihood should be calculated based on the existing controls already in place.

The Risk Matrix should be used to score each identified risk. Firstly the Likelihood of the risk materialising and then the Impact a particular risk could have on the Council is recorded. This is why the risks identified should be specific.

The evaluation results are recorded in the Risk Register. Any risk that scores 4 (red) or more will be highlighted for an action plan. The Risk Register will be kept up to date by the RFO who will need to be informed if any amendments to the initial assessment are required. The Risk Register will be reviewed annually, or when an event occurs that might change the risk status.

3. MITIGATION OF RISK

The next step is to then consider what controls are in place to mitigate the risk. A risk can be mitigated in two ways: one is to reduce the likelihood of it occurring, the other is to reduce the impact to the Council should the risk materialise. In other words what controls are there in place to reduce both the likelihood of a risk materialising and the impact should it do so?

An important point to note is that only controls which actually exist should be considered. If controls are not in place (for example it is planned to have these controls at a future date), then they cannot be considered as mitigating the risk. Controls which will be in place in the future should be considered as an action point in the Risk Register.

Record the current controls in the risk register.

4. DEALING WITH RISK

Following evaluation there are five main control options to manage the risk:

- **Accept the Risk** – in some instances, low-scoring risks may be considered to be acceptable. The risk should be monitored and re-evaluated either annually or when an event occurs which alters the risk.
- **Manage the Risk** – Some form of prevention or control is necessary either to existing controls or by creating a new control. The control should reduce the impact or likelihood, and include timescales for the control to be in place.
- **Transfer the Risk** – to provide financial recompense/support, such as insurance, in the event of loss.
- **Modify the Risk** – Change the activity from which the risk has been identified.
- **Eliminate the Risk** – Withdraw from the activity. This measure would be considered if it was felt that the risk was too great or that the financial cost of mitigating controls was too high.

If the residual risk (risk after implementing the control measure) score is higher than acceptable, further action needs to be identified to manage the risk to reduce the score.

5. MONITORING AND EVALUATING RISK

Risk analysis should be an on-going process, not a one off annual exercise. It should be carried out at regular intervals as identified appropriate for each service as part of the risk assessment. The ultimate aim is that the process becomes an integral part of service delivery.

The Town Clerk is responsible for ensuring the Corporate Risk Management Strategy is carried out and the Corporate Risk Register is kept up to date.

Types of Risk

Strategic Risks	Operational Risks
Those which can affect the medium to long term goals and objectives of the Council.	Those which staff can encounter in their daily work.
Political – failure to deliver local or central government policy, or meet the administration's manifesto commitments.	Professional – associated with the particular nature of each profession
Economic – affecting the ability of the Council to meet its financial commitments. These include budgetary pressures, failure to obtain adequate insurance cover, failure to take account of external economic changes (eg interest rates, inflation), and the consequences of investment decisions or the loss of an investment opportunity	Financial – associated with financial planning and control and the adequacy of insurance cover.
Social – effects of changes in demographic, residential or socio-economic trends on the Council's ability to deliver its objectives.	Legal – possible breaches of legislation eg age discrimination legislation.
Technological – capacity of the Council to deal with the pace/scale of technological change, or its ability to address changing demands. May also include the consequences of internal technological failures on the Council's ability to deliver its objectives.	Physical – related to fire, security, accident prevention and H&S.
Legislative – associated with current or potential changes in National or European Law.	Contractual – failure of contractors to deliver services or products to agreed costs or specification.
Environmental – consequences of progressing the Council's strategic objectives (e.g. in terms of energy efficiency, pollution, recycling, landfill, emissions etc.)	Technological – relating to reliance on operational equipment e.g. IT systems or products to the agreed cost and specification.
Competitive – affecting the competitiveness of services in terms of cost or quality and ability to deliver Value for Money.	Environmental - relating to pollution, noise or energy efficiency of ongoing service operation.
Customer/Citizen – failure to meet current and changing needs and expectations of customers and citizens.	
People - recruitment/retention of qualified staff, succession planning, over reliance on key officers or inability to implement change. Also, lack of clarity over roles and responsibilities.	
Information - Those associated with the security, accuracy, timeliness of any information held or given by the organisation.	
Reputation – adverse publicity in the media.	

Source: Chance or Choice? Risk Management in Local Government - SOLACE

RISK RANKING**STEP ONE – IMPACT (ACTUAL OR POTENTIAL)**

To establish correct 'Descriptor' look in the table below in the four 'Impact' columns for the wording that best describes the event you are reporting. Note: If there are two or more descriptions that fit the event, then use the highest scoring Descriptor.

DESCRIPTOR (SCORE)	Impact on Individual	Scope of impact in terms of volume of people	Impact on the organisation	Financial Impact (estimated cost to reduce risk)
HIGH (3)	Death; Unexpected Death Suspected Homicide Suicide Permanent Injury (Loss of function); (emotional, psychological or physical), ill health or Damage AWOL/Missing Part.	Greater than 50 people	National/ International adverse publicity Temporary/ Extended Service closure Litigation potential greater than £500,000 Increased level of care for greater than 15 days	Greater than £10,000 (can be resolved at Member level)
MEDIUM (2)	Semi-permanent Injury (Likely to be resolved within one year); (emotional, psychological or physical), ill health or Damage	Greater than 3 people but less than 50 people affected	Local adverse publicity Litigation potential greater than £50,000 Increased level of care less than 15 days but greater than 5 days	Less than £10,000 but greater than £1,000 (can be resolved at Town Clerk level)
LOW (1)	No permanent injury (Probably be resolved in one month); (emotional, psychological or physical), ill health or Damage No identifiable Injury; (emotional, psychological or physical), Damage or ill health.	Less than 3 people affected	Litigation potential less than £50,000 Increased level of care less than 5 days No disruption to service	Less than £1,000 (can be resolved at Line Manager level)

STEP TWO – LIKELIHOOD OF RECURRENCE

Likelihood Rating is a matter of personal judgment. You must estimate what is reasonably going to happen by using the table below as a guide.

LIKELIHOOD	DESCRIPTOR	SCORE
HIGH	This type of event will happen again, (and frequently)	3
MEDIUM	This type of event may happen again, (50/50 chance of happening again)	2
LOW	This type of event is unlikely to happen again (remote chance)	1



LCRS 5. Risks report Allotments

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Powers to provide allotments

Requirement = To ensure that the council is fully protected against

Aim = Annual insurance review.

Scoring note:
Low = 1,
Medium = 2
and High = 3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
467	Administration/ Legal	Provision of inadequate insurance cover	Carry out an annual review of Employers/Public Liability insurance to ensure that all appropriate risks are covered.	Annually	Low	Low	1	
469	Administration/ Legal	Inaccurate/out of date Allotment Register	Maintain proper register ensuring all amendments promptly recorded. Ensure agreement completed and signed by all parties prior to occupation.	Annually	Low	Low	1	
501	Environmental	Loss of / Damage to water supply	Ensure that system is in place to report and rectify all faults	Annually	Low	Low	1	
446	Environmental	Vermin	Define responsibility for standards of hygiene/cleanliness etc. of site. Enforce conditions of tenancy Agreement. Contract to Environmental Health to carry out periodic physical inspection and take remedial action.	Annually	Low	Low	1	
448	Environmental	Vandalism	A Team to Carry site inspection at least once a week. Review Security. Maintain liaison with law enforcement agencies. A team to respond promptly to any complaints of vandalism.	As and When	Medium	Low	2	
214	Environmental	Untidy Plots	Define responsibility in Agreement & enforce requirements Carry out regular site visits, officers accompanied by 1 elected Member. Notify Allotment holder of problem & serve notice where necessary. Liaise where appropriate with co-opted members of Allotments Working Group.	Monthly	Medium	Low	2	
215	Environmental	Risk from ploholders inappropriately dumping rubbish on site	Enforce controls in tenancy agreement. Make arrangements for removal and recharge if possible. Regular inspections with Members and LALGA rep. A Team monitor when on site. Weekly site inspection.	Monthly	Medium	Low	2	
449	Financial	Failure to collect rents and charges	Maintain proper records of income received and banked. Enforce provisions of tenancy agreements. Maintain allotment register. Follow defined procedure for outstanding debt. Reconciliation of allotment & accounts software.	Quarterly	Low	Low	1	



LCRS 5. Risks report Allotments

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Powers to provide allotments

Requirement = To ensure that rent income is subject to regular review.

Aim =

Scoring note:
Low = 1,
Medium = 2
and High = 3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
447	Financial	Failure to review rents and charges	Review allotment rents and charges annually as an integral part of the annual budget process.	Annually	Low	Low	1	
212	Physical	Public Injury as a result of contractor or Amenity Team	Ensure that contract requires provision of appropriate insurance cover and inspect insurance documentation to confirm compliance.	As and when	Low	Low	1	
445	Physical	Personal injury	Ensure that any conditions that might lead to personal injury are minimised and properly controlled. Carry out periodical examination of allotment environment. Ensure appropriate training of staff to use equipment.	Annually	Low	Medium	2	
310	Physical	Unoccupied Plots/loss of income	Maintenance of waiting list with details on website, contact details on allotment notice boards and regular reports in local free press, if required.	Monthly	Low	Medium	2	
60	Physical	Security	Ensure that responsibility of allotment holders is clearly defined in tenancy agreement and that they have a clear method of reporting incidents.	Annually	Low	Low	1	
59	Physical	Maintenance of Council owned vehicles and equipment	Ensure that vehicles and equipment is properly maintained through regular inspection/servicing. Ensure that proper maintenance records are complete and up to date. Ensure that responsibility is defined and any training requirement is complete. Ensure vehicles are taxed and MOTed.	Annually	Low	Medium	2	

Completed by:

Date:

Position:

No of risks scored

14

Average score:

1.4



LCRS 5. Risks report Bye Laws

Littlehampton Town Council Assessment for year 2018 To 2019

Your Duty = Power to make bye-laws in regard to

Requirement = Need to maintain a comprehensive register of all byelaws

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
105	Physical	Failure to maintain register. Failure to enforce.	Ensure that the byelaw is regularly reviewed. Ensure enforcement authorities are aware of byelaw and liaise with them where issues arise.	Annually	Low	Medium	2	

Completed by:

Date:

Position:

No of risks scored

1

Average score:

2.0



LCRS 5. Risks report Clocks

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to provide public clocks

Requirement = To ensure that all risks are adequately covered

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
r02	Administration/ Legal	Provision of adequate insurance cover	Ensure that all risks are reviewed annually. Ensure that appropriate insurance cover is in place.	Annually	Low	Low	1	
r16	Financial	Inadequate budget Provision	Ensure that anticipated costs are adequately provided for in Budgetary process. Council approval for any unexpected expense to be met from reserves/virement.	Annually	Low	Low	1	
r08	Physical	Security of Clock	Ensure appropriate arrangements in place.	Annually	Low	Low	1	
r09	Physical	Maintenance of Clock	Ensure that contractor has any necessary insurance cover. Ensure appropriate maintenance is carried out. Maintain proper records of work done.	Annually	Low	Low	1	

Completed by:

Date:

Position:

No of risks scored

4

Average score:

1.0



LCRS 5. Risks report Code of Conduct

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Duty to adopt a code of conduct

Requirement =

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
336	Administration/ Legal	Failure to maintain /Update Register of Interests/Gifts	Ensure all Council members are aware of their statutory responsibilities. Maintain appropriate registers.	Annually	Low	Medium	2	

Completed by:

Date:

Position:

No of risks scored

1

Average score:

2.0



LCRS 5. Risks report Community Centres

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to provide and equip buildings for use of clubs having
Requirement = To provide effective control of facility bookings etc.

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
131	Administration/ Legal	Maintenance of diary of events/usage	Define responsibility for maintenance of diary. Completed booking/application a pre-requisite to facility hire. All applications to be cross referenced to account/receipt number and filed.	Annually	Low	Medium	2	
136	Administration/ Legal	Failure to obtain all necessary licences, music, weddings, etc	Define responsibility for obtaining licences. Maintain adequate records of licence application, renewal etc.	Annually	Low	Medium	2	
138	Environmental	Cleaning	Define responsibility for cleanliness/hygiene of premises. Keep a maintenance log/cleaning regime and arrange for periodical checks.	Monthly	Low	Medium	2	
140	Environmental	Vandalism	Review security and monitor all areas on a regular basis. Maintain liaison with local enforcement agencies. Instigate legal action against perpetrators where appropriate	Annually	Low	Medium	2	
141	Environmental	Pollution, ie. noise, litter etc.	Ensure that adequate controls/conditions are included in booking application form. Ensure that all users are aware of conditions attached to use of premises. Define policy for dealing with offenders.	Annually	Low	Medium	2	
132	Financial	Inadequate budget provision	Ensure that anticipated costs are adequately provided for in Budgetary process. Council approval to be sought for any unexpected expense to be met from reserves/virement.	Annually	Low	Medium	2	
127	Financial	Failure to review charges	Review all charges annually as an integral part of the budget process.	Annually	Low	Medium	2	
128	Financial	Failure to collect income	Define responsibility for collection of income. Maintain an effective receipting system and bank promptly. Maintain proper records of income received and banked. Enforce provisions of user agreements. Reconciliation and unpaid invoices chased monthly. Regular financial report to Council.	Quarterly	Low	Medium	2	



LCRS 5. Risks report Community Centres

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to provide and equip buildings for use of clubs having
Requirement = To maintain a high standard of security.

Aim =

Scoring note:
Low = 1,
Medium = 2
and High = 3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
16	Physical	Security of buildings	Allocate responsibility for security/control of premises. Define policy and provide for security. Staff employed or contract with service provider in place. Appropriate staff training complete. Detailed schedules/records maintained. Liaison with local enforcement agencies maintained.	Annually	Low	Medium	2	
143	Physical	Security of Hazardous Substances + D73	Define responsibility for use and control & provide for any necessary training and appropriate clothing. Ensure that any necessary licences, certificates for use have been obtained & that security is sound. Ensure that any disposals are properly dealt with. Maintain proper records.	Annually	Low	Medium	2	
0	Physical	Maintenance of buildings	Define responsibility for maintenance. Maintain detailed records of work scheduled and completed. Carry out regular inspections of all buildings. Ensure that proper contractual arrangements are in place for specialist/other services.	Monthly	Low	Low	1	
144	Physical	Maintenance of equipment	Ensure that equipment is properly maintained through regular inspection/servicing & keep the proper maintenance records. Ensure that responsibility is defined and any training requirement is complete. Ensure that proper contractual arrangements are in place for specialist/other services. Arrange adequate insurance cover.	Annually	Low	Medium	2	
137	Physical	Security of equipment	Ensure that responsibility of users is clearly defined in hire/user agreement. Allocate responsibility for security/control. Maintain records of loss or damaged equipment. Maintain asset and equipment register.	Annually	Low	Medium	2	



LCRS 5. Risks report Community Centres

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to provide and equip buildings for use of clubs having
Requirement = To ensure that any conditions that might lead to personal
Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
13	Physical	Personal injury	<p>Ensure that all staff have appropriate training and adhere to approved working practices.</p> <p>Ensure that the correct, properly maintained equipment is available as appropriate.</p> <p>Ensure that any risks to the public are minimised and eliminated wherever possible.</p> <p>Maintain records of staff training.</p> <p>Maintain records of any injuries.</p> <p>Define responsibility in job descriptions etc.</p>	Annually	Low	Medium	2	
11	Physical	Fire	<p>Ensure Health/Safety testing complete.</p> <p>Ensure appropriate staff training.</p> <p>Provide for strict security/control of combustible materials held by Council.</p> <p>Provide appropriate extinguishers etc.</p> <p>Ensure appropriate signage in place.</p> <p>Ensure appropriate regulations/controls in hire documentation.</p> <p>Annual Fire risk assessment</p>	Quarterly	Low	Low	1	

Completed by:

Date:

Position:

No of risks scored

15

Average score:

1.9



LCRS 5. Risks report Computing

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to facilitate discharge of any function

Requirement = Maintain security of computer

Aim =

Scoring note:
Low = 1,
Medium = 2
and High = 3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
11	Physical	Loss/damage arising from unauthorised use.	Restrict access through use of controlled passwords. Maintain physical security of computer and site.	Annually	Low	Low	1	
11	Physical	Loss arising from theft/misappropriation	Allocate responsibility for security of equipment. Maintain high security of site and equipment. Take particular care in respect of laptops/peripherals.	Annually	Low	Medium	2	
165	Technical	Crash of IT System - loss of all records - loss of Broadband	Daily backup of data onto two forms of appropriate medium. Regular backup of data onto a third appropriate medium. Ensure that equipment is properly maintained. Restrict access to authorised users. Ensure that only approved software is used. Maintain effective anti virus software. Use reputable provider for Broadband.	Monthly	Low	Medium	2	

Completed by:

Date:

Position:

No of risks scored

3

Average score:

1.7



LCRS 5. Risks report Council Meetings

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty =

Requirement = To meet all statutory requirements and maintain effective

Aim = To meet all statutory requirements

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
453	Administration/ Legal	Failure to provide appropriate access	Ensure that access is available to all. Have regard to provisions for Disablement & Disability. Set aside specific area for Press & Public.	Annually	Low	Low	1	
453	Administration/ Legal	Failure to meet statutory duty	Ensure that all members are notified of meeting by way of summons and agenda. Ensure that all public notices are posted as prescribed. Ensure meeting quorate and maintain attendance records. Complete minutes of proceedings. Arrange signing by Chair and maintain file.		Low	Low	1	
454	Physical	Security Failure	Define policy for security of staff, members, premises and equipment. Allocate responsibility for security/control and implementation. Maintain liaison with local enforcement agencies.	Annually	Low	Low	1	
455	Physical	Personal Injury	Ensure that appropriate regulations/controls are in place to minimise the risk of injury to officers, members & public. Ensure that defined standards are being maintained. Ensure that, where necessary, appropriate notices are in place. Ensure that the Council has appropriate insurance cover.	Annually	Low	Low	1	

Completed by:

Date:

Position:

No of risks scored

4

Average score:

1.0



LCRS 5. Risks report

Council Property and Documents

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Duty to disclose documents and to adopt publication scheme

Requirement =

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Category	Description	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value (> 3)	Your action required
10	Financial	Incorrect/ non recording of Assets	Up to date asset Register, maintained by RFO. Internal Audit.	As and when	Low	Low	1	
11	Financial	Injury to members of the public	Regular maintenance and Inspection		Low	Low	1	
311	Financial	Legal Liability as a result of Asset Ownership	Ensure that adequate Public Liability Insurance is in place.	Annually	Low	Low	1	
312	Physical	Loss / Damage to Civic Regalia	Maintain and update a Register of Assets. Ensure that the Council has adequate insurance against damage and theft. Ensure that proper security/storage is in place. Ensure that users are aware of their responsibility when regalia is in their care. Ensure that Civic Regalia in suitably maintained and cleaned. Ensure that the Civic Regalia is collected and returned under secure conditions	Monthly	Low	Low	1	
313	Physical	Loss of assets	Allocate responsibility for and maintain effective security of all assets. Maintain an Asset Register. Ensure property deeds are maintained in an appropriate and safe environment and move towards registering all land at land registry. Ensure that adequate and appropriate insurance cover is held.	Annually	Low	Medium	2	
111	Professional	Failure to effectively process documents	Allocate responsibility for maintenance of effective control of documentation. Define procedure for recording document's receipt, circulation, response, handling & filing.	Daily	Low	Medium	2	

Completed by:

Date:

Position:

No of risks scored

6

Average score:

1.3



LCRS 5. Risks report Data Protection

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Duty of Notification and Duty to Disclose (subject access)

Requirement =

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
	Administration/ Legal	Breach of Confidentiality	Arrange Registration under the Data Protection Act. Formalise Procedure for dealing with Confidential Data. Train all staff on Data Protection Legislation.	Daily	Low	Low	1	

Completed by:

Date:

Position:

No of risks scored

1

Average score:

1.0



LCRS 5. Risks report Employment of Staff

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Duty to Appoint

Requirement = To ensure that the council fulfills it's responsibilities.

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
364	Administration/ Legal	Failure to comply with Law	Employment Issue contracts of employment to all employees. Awareness of new legislation. Subscribe to appropriate organisations for regular updates and Training.	As and When	Low	Medium	2	
357	Professional	Attacks on Personnel	Ensure that an effective security sytem is in operation. Ensure appropriate insurance cover held. Ensure other workers in building are aware of staff working alone. Ensure staff have telephone access at all times during their work. Instruct out of office hours staff to refuse admittance to the Council Offices to people unknown to them.	Monthly	Low	Medium	2	
358	Professional	Loss of key staff	Ensure procedures for covering key functions are documented.	Annually	Low	Medium	2	
362	Professional	Lack of Training	Determine a policy for training. Arrange annual review. Regular Staff Appraisals to highlight any training needs. Take advantage of any localised training through local associations, SLCC etc. Encourage staff to network with other Clerks in the area. Maintain appropriate training records.	Annually	Low	Low	1	
363	Professional	Lack of Employee motivation/efficiency	Ensure that each employee has job description. Arrange regular staff appraisals. Maintain appropriate staff records. Defined training policy in operation.	Annually	Low	Medium	2	
38	Professional	Inability to retain and recruit staff	Review salary and staff structures regularly. Regular Staff Appraisals. Complete exit questionnaire.	Annually	Low	Medium	2	

Completed by:

Date:

Position:

No of risks scored

6

Average score:

1.8



LCRS 5. Risks report Entertainment and the arts

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Provision of entertainment and support of the arts

Requirement = To plan events to ensure succesful and safe delivery

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
11	Administration/ Legal	Inadequate Event Planning	Event management Plan created for each event. Risk Assessment completed for each event. High risk events liaise with Safety Advisory Group.	As and when	Low	High	3	
112	Administration/ Legal	Absence of key staff	Define responsibility for staff control. Ensure that proper arrangements are in place to meet service requirements. Have arrangements in place for emergency cover.	Annually	Low	Medium	2	
382	Administration/ Legal	Provision of inadequate insurance cover	Carry out annual review of insurance to ensure appropriate cover in place. Ensure that any contractual insurance requirements are met. Examine cover held by service providers.	As and When	Low	High	3	
139	Administration/ Legal	Lack of staff training	Determine Council policy for training. Ensure that all staff receive appropriate training where necessary. Maintain records of training provided.	Annually	Low	Medium	2	
429	Environmental	Vandalism	Maintain efficient and effective security. Maintain liaison with local enforcement agencies. Take action as appropriate against offenders.	As and When	Low	Medium	2	
169	Environmental	Noise pollution	Where appropriate set conditions in hire documentation. Carry out regular site inspections. Maintain record of any complaints received and instigate prompt action where appropriate. Liaise with local enforcement agencies. Include in event management plans.	As and when	Low	Medium	2	
11	Environmental	Mass Crowd Misbehaviour	Event Management Plan created for each event. Risk Assessment completed for each event. High risk events liaise with Safety Advisory Group. Direct liaison with police.	As and when	Low	Medium	2	



LCRS 5. Risks report

Entertainment and the arts

Littlehampton Town Council

Assessment for year 2018 To 2019

Your Duty = Provision of entertainment and support of the arts

Requirement = To maximize income due to the council

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
166	Financial	Failure to collect rents and charges for event stallholders	Define responsibility for collection of income. Ensure that all income due to the Council and received is properly recorded. Make provision for prompt banking. Issue tickets and receipts for all income received. Follow defined procedure for reminders in respect of unpaid accounts. Take appropriate recovery action where necessary. Arrange appropriate internal audit testing. Council approval required for write-off on any irrecoverable debts.	As and When	Low	Medium	2	
167	Financial	Failure to review rents and charges	Review all charges annually	Annually	Low	Medium	2	
165	Financial	Failure to deliver the events planned	Ensure that the resource requirements are detailed in the budget process and approved by committee. Use reputable/experienced/quality contractors who can deliver to brief and help with back up provision.	As and When	Low	High	3	
171	Financial	Contractual arrangements with service providers- films, artistes etc.	Ensure that a signed contract is in place as pre requisite of service provision. Check/enforce contract conditions in interest of Council.	As and when	Low	High	3	
19	Fire	Fire	Ensure Health/Safety testing complete. Follow Fire Safety Risk Assessment Guide for open air event and venues issued by HM Gov. Ensure appropriate staff training. Provide appropriate extinguishers etc. Ensure appropriate signage in place. Examine service providers documentation. Ensure appropriate regulations/controls in hire documentation. Examine service providers documentation. Ensure emergency evacuation plans in place.	As and When	Low	High	3	



LCRS 5. Risks report Entertainment and the arts

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Provision of entertainment and support of the arts

Requirement = To minimize loss through theft/misappropriation

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
173	Physical	Loss of equipment	Define policy for security of premises and equipment. Determine responsibility for security/control of equipment. Ensure effective security arrangements in place. Maintain asset register.	Annually	Low	Medium	2	
170	Physical	Terrorism	Event Management Plan created for each event. Risk Assessment completed for each event. High risk events liaise with Safety Advisory Group. Direct liaison with police.	As and when	Low	High	3	
170	Physical	Faulty Equipment	Determine responsibility for use and control. Check equipment before each use. Arrange contract maintenance for specialist equipment. Provide for any necessary staff training. Provide for appropriate protective clothing. Ensure that any necessary licences, certificates for use have been obtained. Ensure that security is sound. Ensure that any disposals are properly dealt with. Maintain proper records.	As and When	Low	High	3	

Completed by:

Date:

Position:

No of risks scored

15

Average score:

2.5



LCRS 5. Risks report Financial Management

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Duty to ensure responsibility for financial affairs

Requirement = To minimise the risk of loss due to

Aim = None

Scoring note:
Low = 1,
Medium = 2
and High = 3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
302	Administration/ Legal	Failure to comply with HMRC Regulations on Tax	Maintenance of comprehensive records of all calculations of income tax, national insurance deducted from pay. Regular returns to HMRC; prepared by the RFO; checked by the Town Clerk. Arrange prompt payment of all sums due.	Quarterly	Low	Medium	2	
11	Administration/ Legal	Failure to maintain record of Council assets.	Define responsibility for maintenance of asset register. Ensure that all acquisitions/disposals are accurately and promptly recorded. Carry out periodical inventory checks.	Annually	Low	Medium	2	
303	Administration/ Legal	Failure to comply with HMRC Regulations on VAT	Ensure that value added tax is properly administered. Refer to guidance in HMRC Notice 749. Seek further guidance from HMRC where necessary. Ensure that all input tax and output tax is properly recorded Complete and submit VAT claims promptly and on a regular basis. Reconcile claims to cashbook.	Quarterly	Low	Medium	2	
11	Administration/ Legal	Incurring expenditure without proper legal authority	Record in minutes under which expenditure is being approved. Budgetary process. Cheque signatories 2 Members	Annually	Low	Medium	2	
11	Financial	Payment made to non existent supplier	Segregation of duties. POs raised by officers and authorised by senior officer. Invoices processed by Finance Assistant. Authorised by RFO. PO/Invoice and cheques given to 2 Members to sign. TC initials cheques. Procurement Procedures. Financial Regs.		Low	Low	1	
11	Financial	Loss of income through poor banking arrangements including borrowing and lending	Annual Investment Strategy approved by Council annually. Qualified RFO.	Annually	Low	Low	1	



LCRS 5. Risks report Financial Management

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Duty to ensure responsibility for financial affairs

Requirement = To minimise the risk of loss due to

Aim =

Scoring note:
Low = 1,
Medium = 2
and High = 3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
311	Financial	Failure to keep proper financial records	<p>Define responsibility through appointment of qualified RFO.</p> <p>Ensure appropriate Standing Orders and Financial Regulations in place that are subject to periodic review.</p> <p>Monthly Bank reconciliation Reviewed by Chair of P & F.</p> <p>Implement effective independent Internal Audit.</p> <p>Introduce periodical checks by Chairman/other appointed Members.</p> <p>Arrange for quarterly financial reports to Committee/Council</p>	Monthly	Low	Medium	2	
304	Financial	Failure to ensure proper use of funds under specific powers under section 137 of LG Act 1972	<p>Ensure that all expenditure under section 137 is separately recorded in the cashbook.</p> <p>Ensure that total expenditure does not exceed the statutory limitation for the Council.</p> <p>Ensure that all grant applications are complete and fully supported prior to submission to committee/Council</p> <p>Ensure that all approvals are properly recorded in Council minutes.</p> <p>Ensure that no alternative statutory authority is available.</p>	Annually	Low	Medium	2	
347	Financial	Poor Financial Management	<p>Determine responsibility for the management of the financial affairs of the Council.</p> <p>Maintain and review Standing Orders/Financial regulations.</p> <p>Maintain an effective budgetary control/financial reporting system.</p> <p>Maintain an effective Internal Audit.</p>	Annually	Low	Medium	2	
305	Financial	Risk to third party as a consequence of providing a service	<p>Ensure that appropriate insurance cover/policy is in force.</p>	Annually	Low	Medium	2	



LCRS 5. Risks report Financial Management

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Duty to ensure responsibility for financial affairs

Requirement = To ensure that effective financial controls are in place

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
306	Financial	Loss of money through theft/misappropriation	Determine responsibility for cash at all sources. Ensure that receipts are issued for all cash income. Ensure that secure arrangements are in place for all monies held pending banking. Ensure that proper arrangements are in place for prompt recording and banking of all cash received. Ensure regular bank reconciliation. Arrange regular reports to Council. Ensure that Council holds adequate fidelity guarantee insurance.	Monthly	Low	Low	1	
01	Financial	Failure to maintain an effective payments system	Determine responsibility for control of expenditure. All payments to be supported by an invoice/voucher. All detail to be checked and payment entered into a cashbook. All payments to be approved by 2 Councillors who are cheque signatories. All cheques to be signed by at least two authorised Members. All expenditure to be the subject of sound budgetary control.	Monthly	Low	Medium	2	
309	Financial	Failure to set a Precept within sound budgeting arrangements	Determine responsibility of Clerk/Committee/Council. Ensure that presentation to Committee & Council follows an agreed timetable. Ensure that Precept is set as a result of a full report detailing requirements for forthcoming year for all heads of income and expenditure. Review all charges made by the Council. Review adequacy of all balances and reserves. Ensure that effective budget monitoring is in place throughout the year.	Monthly	Low	Medium	2	
01	Financial - Payroll	Hours claimed incorrectly on timesheets	Employee & Line Manager sign, RFO checks, TC authorises all timesheets		Low	Low	1	



LCRS 5. Risks report Financial Management

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Duty to ensure responsibility for financial affairs

Requirement = To minimise the risk of loss due to

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
11	Financial - Payroll	Fictitious /duplicate staff on payroll	RFO runs payroll. TC signs new employee forms, timesheets and sage printout of all staff paid. TC signs telepay form. Internal Audit checks bi-annually		Low	Low	1	

Completed by:

Date:

Position:

No of risks scored

15

Average score:

1.7



LCRS 5. Risks report General Data Protection Regulation

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Duty to comply with data protection principles

Requirement = Duty to demonstrate compliance with data protection

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Description	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
11	Administration/Legal	Breach of data protection and/or confidentiality	Daily	Medium	High	6	Yes
		Policy and Procedure for Data Protection and data retention Staff trained in data protection. Registered with ICO.					

Completed by:

Date:

Position:

No of risks scored

1

Average score:

6.0



LCRS 5. Risks report Gifts

Littlehampton Town Council Assessment for year 2018 To 2019

Your Duty = Power to accept

Requirement = To protect interest of Council and Members

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
453	Administration/ Legal	Bribery - Failure to notify/record gifts	Ensure that all staff/members are aware of responsibilities. Maintain gift register.	Annually	Low	Medium	2	

Completed by:

Date:

Position:

No of risks scored

1

Average score:

2.0



LCRS 5. Risks report Investments

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to participate in schemes of collective investment

Requirement = To maintain proper records.

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
206	Administration/ Legal	Maintenance of Investment Register	RFO responsible for maintenance of investment register. Maintain effective Internal Audit.	Annually	Low	Low	1	
198	Financial	Inappropriate investment	Define policy and responsibility for investment of Council funds. Annual Investment Policy review.	Annually	Low	High	3	
199	Financial	Failure to review interest rates etc.	Determine policy and responsibility for investment of Council funds. Carry out regular review to ensure maximum return is achieved.	Annually	Low	Medium	2	
177	Financial	Financial Loss i.e. theft	Determine policy/responsibility for investment. Ensure that type of investment is subject to Council approval. Ensure that transactions where appropriate are subject to counter signatures of Clerk/authorised Council Members. Arrange for regular financial/monitoring report to Council. Only allow transfers between Council Accounts	Annually	Low	Medium	2	

Completed by:

Date:

Position:

No of risks scored

4

Average score:

2.0



LCRS 5. Risks report Land

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to acquire by agreement, to appropriate, to dispose of
Requirement = To ensure that all assets of the council are properly recorded.

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
25	Administration/ Legal	Maintenance of Asset Register	RFO responsible for maintenance of an asset register.	Annually	Low	Low	1	
20	Environmental	Fly tipping	Define policy/responsibility for site control/security. Carry out periodical site inspection. Provide proper facilities for control and removal of waste. Liaise with police/other authority where necessary.	Annually	Low	Low	1	
21	Environmental	Maintenance of land including grass cutting	Define responsibility for maintenance and ensure that a planned programme is in place. Maintain adequate records of inspection to ensure that maintenance has been properly carried out.	Annually	Low	Low	1	
22	Environmental	Vandalism	Review security and monitor all areas on a regular basis. CCTV to be installed where appropriate Maintain liaison with law enforcement agencies.	Annually	Low	Low	1	
23	Financial	Inadequate budget provision	Ensure that all anticipated income/costs are provided for in Budgetary process.	Annually	Low	Low	1	
239	Physical	Public/Personal Injury	Ensure that all staff have appropriate training and adhere to approved working practices. Ensure that the correct, properly maintained tools/equipment are available as appropriate. Ensure that all appropriate disclaimer notices, warning signs etc. are in place. Ensure that any risks to the public are minimised or eliminated wherever possible. Maintain records of training. Maintain records of any injuries. Define responsibility in job descriptions etc. Ensure that the Council holds adequate insurance cover.	Annually	Low	Low	1	

Completed by:

Date:

Position:

No of risks scored

6

Average score:

1.0



LCRS 5. Risks report

Meetings of the Council

Littlehampton Town Council

Assessment for year 2018 To 2019

Your Duty = Duty to meet

Requirement = All Meetings open to everyone

Aim = Standing Orders on Conduct

Scoring note:
Low = 1,
Medium = 2
and High = 3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
30	Administration/ Legal	Failure to respond to the elector's wish to exercise his/her rights	Ensure members and staff are aware of Electors' Rights. Follow procedures for dealing with enquiries. Increase awareness of accessibility of the Council to the public. Monitor that responses have been made within agreed deadlines.	Annually	Medium	Low	2	
36	Administration/ Legal	Failure to comply with new Regulations/Legislation	Ensure relevant new legislation is reported to Council. Ensure that proper training policy is in place. Continue in membership of appropriate local/national associations. Continue to subscribe to appropriate publications. Encourage staff networking.	Monthly	Low	High	3	
37	Administration/ Legal	Failure to record Council business in Minutes	Ensure proper, timely and accurate recording of Council business in the minutes. Ensure that all minutes are signed. Maintain security of master copy.	Quarterly	Low	High	3	
40	Administration/ Legal	Failure to comply with Disability and Discrimination & Equalities Acts	Ensure that all conditions of the Act as they affect service provision are met. Allocate responsibility to ensure that standards/ongoing requirements are met. Carry out periodical review of service on new services/events/equipment etc.	Annually	Low	High	3	
355	Administration/ Legal	Failure to meet statutory duty on meetings	All notices are posted in the prescribed places 3 clear days prior to any meeting, All Councillors are notified of Meetings by way of a summons and agenda, Minutes of all meetings are taken and kept. Maintain attendance records.	Monthly	Low	Medium	2	

Completed by:

Date:

Position:

No of risks scored

5

Average score:

2.6



LCRS 5. Risks report Museum

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty =
Requirement =
Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
11	Administration/ Legal	Failure to Risk Assess	Ensure procedural risk assessments are carried out for individual events. Ensure risk assessments are kept on file. Review file annually.	As and when	Low	Low	1	
11	Environmental	Temperature & Humidity Controls	Data loggers in store rooms & cases Regular recordings of humidity & temperature readings	Weekly	Low	Medium	2	
11	Financial	Budget overspend	Annual budget in place. Monthly review of budget totals to keep up to date.	Annually	Low	Medium	2	
11	Financial	Inadequate Insurance cover - Art	10 year review of full art collection undertaken. New accessions added to rolling register.	Annually	Low	Low	1	
11	Financial	Inadequately trained staff	Museum staff training reviewed annually. Specialist training sought through the MA/SMG for both staff & volunteers.	Annually	Low	Medium	2	
11	Financial	Insufficient funds to manage the Museum	Set Annual Budget and approve by committee. Monthly budget printouts to monitor totals Regular review of individual budget totals by Curator	Annually	Low	Medium	2	
11	Financial	Inappropriate budget codes/headings	Review annually to ensure budget headings remain relevant	Annually	Low	Low	1	
11	Financial	Stock losses	Annual stock checks. Curator has responsibility for checks. Record of all stock purchases/sales kept	Annually	Low	Low	1	
11	Financial	Vandalism	CCTV system to be monitored daily. Annual check ups by installation company. Staff to be trained in use of CCTV system. Security procedure in place.	Annually	Low	Medium	2	
11	Financial	Theft	Security procedure in place for contacting local police. Procedure in place for contacting the 'Art Fund Risk Register' if necessary. Salvage plan in place..	Annually	Low	Medium	2	



LCRS 5. Risks report Museum

Littlehampton Town Council Assessment for year 2018 To 2019

Your Duty =
Requirement =
Aim =

Scoring note:
Low = 1,
Medium = 2
and High = 3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
11	Financial	Inappropriate Funding Applications	Curator responsible for dealing with grant applications. Ensure any conditions are adhered to. Carry out regular monitoring & review. Applications checked by ACT	As and when	Low	Low	1	
12	Financial	Museum ineligible for external funding	Museum to maintain eligibility for funding by maintaining accreditation. Museum continues to run as a free enterprise for the public. Staff training in this area reviewed annually.	Annually	Low	Low	1	
13	Physical	Non DBS checked staff	DBS checks undertaken & monitored.	Annually	Low	Medium	2	
14	Physical	Data Protection issues	Ensure all consent forms for events & outreach are kept on file for only as long as needed. Shred all irrelevant personal data records for the public.	As and when	Low	Medium	2	
15	Physical	Natural disasters - flooding, fire	Emergency Plan in place. Risk Assessments completed for all storage/gallery spaces. Salvage inventory kept on file. Salvage kit available at 2 sites: Museum & A Team Premises. Contacts database maintained for salvage.	Annually	Low	High	3	
16	Physical	Lack of staff cover for events	Manage staff leave effectively. Procedure in place in case of event cancellation.	As and when	Low	Medium	2	
17	Physical	Security of Collection	Curator has responsibility for all items. Maintenance of CCTV records for Galleries. Daily staff checks of store rooms. Ensure locking up procedure in place. Ensure adequate insurance cover.	Annually	Low	Medium	2	
18	Physical	Concurrent sick leave	Procedures in place for functioning of museum. Contact procedure in place for contacting volunteers/managing diary of Curator. Saturday closure procedure in place.	Annually	Low	Low	1	
19	Physical	Inadequate Staff Provision	Manage staff leave effectively to ensure coverage. Monitor training needs to cover personnel gaps. Train volunteers for certain tasks. Annually review staff provision.	Annually	Low	Low	1	



LCRS 5. Risks report Museum

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty =

Requirement =

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
11	Physical	Lack of Volunteer supervision	Curator to ensure staff are present with volunteers most of the time and only left alone if thought appropriate. Contacts available in place in case of cancellation of volunteer's hours necessary.	As and when	Low	Low	1	
11	Physical	Storage problems	Ensure stock ordered does not exceed storage capacity. Have an overflow storage area in place.	Annually	Low	Low	1	
11	Physical	Loss of Museum MODES database	Keep external backups of information stored on database in the cloud. Hard copy backups in museum safe.	Annually	Low	Medium	2	
11	Physical	Maintenance of equipment	Curator has responsibility for use & control. Arrange maintenance contract for specialist equipment. Provide for any necessary equipment. Ensure that security is in place.	Annually	Low	Low	1	
11	Professional	Unqualified/trained staff	Annual review of training needs. Training programme in place.	Annually	Low	Low	1	

Completed by:

Date:

Position:

No of risks scored

24

Average score:

1.5



LCRS 5. Risks report Newsletters

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to provide from 'free resource'

Requirement = To minimize associated risk

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
251	Administration/ Legal	Defamation	Ensure that all input is subject to careful check. Arrange for professional examination of any sensitive material. Ensure that adequate insurance cover is held.	Quarterly	Low	Low	1	
307	Administration/ Legal	Failure to meet minimum requirement for quality status	Editorial Board to ensure input requirements are met.	Quarterly	Low	Low	1	
01	Administration/ Legal	Failure to meet statutory obligation re non - political content	Editorial Board and Town Clerk to ensure that content of newsletter is carefully tested to ensure that statutory requirement is met.	Quarterly	Low	Medium	2	
01	Environmental	Failure to deliver and litter	Determine policy for distribution. Prepare written conditions for service providers. Test distribution arrangements. Take appropriate action against offenders.	Quarterly	Low	Low	1	
01	Financial	Inadequate budget provision	Ensure that service requirements are included in budgetary process.	Annually	Low	Low	1	
01	Physical	Non production of newsletter	Determine responsibility and ensure that all publication deadlines are met. Ensure that all agreements with service providers are in place. Monitor performance to ensure that contract conditions/obligations are met. Enforce contract conditions. Review conditions periodically.	Quarterly	Low	Low	1	

Completed by:

Date:

Position:

No of risks scored

6

Average score:

1.2



LCRS 5. Risks report Open spaces

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to acquire land and maintain

Requirement = To minimise risk arising from anti-social behaviour.

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
0	Environmental	Vandalism	Maintain liaison with local enforcement agencies.	Monthly	Low	Low	1	
326	Environmental	Pollution	Carry out regular site inspections. Maintain record of any complaints received and instigate prompt action where appropriate. Liaise with local enforcement agencies.	Daily	Low	Low	1	
333	Environmental	Fly tipping	Carry out regular week day site inspections. Ensure any hazardous substances are properly dealt with. Maintain liaison with local enforcement agencies. Enforce regulations/byelaws as appropriate.	Daily	Low	Low	1	
424	Environmental	Vandalism	Take reasonable action to maintain security of sites. Arrange for regular site visits. Maintain liaison with local enforcement agencies. Define policy for dealing with offenders.	Daily	Medium	Low	2	
0	Financial	Inadequate budget provision	Ensure that service income/expenditure is detailed in budgetary process.	Annually	Low	Low	1	
411	Physical	Personal injury	Ensure that appropriate regulations/controls are in place to minimise the risk of injury to all facility users. Arrange regular site inspection to ensure that defined standards are being maintained. Ensure that, where necessary, appropriate signage is in place. Maintain detailed records. Ensure appropriate insurance cover in place.	Annually	Low	Low	1	

Completed by:

Date:

Position:

No of risks scored

6

Average score:

1.2



LCRS 5. Risks report

Planning & Development Control

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Rights of consultation

Requirement =

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Category	Description	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
0	Administration/ Legal	Devolved planning- Making Decisions contrary to ADC Officers recommendations	Appropriate and regular Councillor training. Regular Consultation with ADC Officers. Appropriate Insurance cover.	As and when	Low	High	3	
202	Environmental	Failure to comply within consultation deadline	Ensure adequate number of Planning & Transportation Committee meetings are arranged. Where necessary liaise with the Planning Authority for possible extension.	Annually	Low	Low	1	

Completed by:

Date:

Position:

No of risks scored

2

Average score:

2.0



LCRS 5. Risks report Play Areas

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to provide

Requirement = To maintain a register of complaints/injuries and action taken

Aim = Complete complaint etc. register as required

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
1)	Administration/ Legal	Inadequate maintenance of records	To ensure that proper records of all complaints/injuries are maintained.	Annually	Low	Low	1	
2)	Financial	Inadequate budget provision	Ensure that service requirements are detailed in annual budget process.	Annually	Low	Low	1	
3)	Financial	Inadequate insurance cover	To include all relevant risks on the Council's insurance policy	Annually	Low	Low	1	
4)	Physical	Personal Injury	ADC monthly inspection of play areas, equipment & surfaces. Annual inspection and report by suitably qualified professional. Ensure that inspection timetable is adhered to and inspection log completed. LTC Visual inspection daily M-F, detailed maintenance inspection monthly. Maintain records of all inspections/maintenance.	Daily	Low	Low	1	

Completed by:

Date:

Position:

No of risks scored

4

Average score:

1.0



LCRS 5. Risks report Provision of Office Accommodation

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to provide

Requirement = To ensure proper financial provision.

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Category	Aim	Contact	Review timing	Likelihood of occurrence	Impact on Council	Risk Value (> 3)	Your action required
329	Financial	Inadequate budget provision	Ensure requirements included in annual budget process.	Annually	Low	Medium	2	
329	Physical	Poor Office Conditions	Arrange periodical inspection of office. Report any adverse conditions to Council/Committee as appropriate. Arrange regular repair/maintenance program.	Quarterly	Low	Low	1	
330	Physical	Fire	Ensure Health & Safety testing complete. Ensure appropriate staff training. Provide for strict security/control of combustible materials held by Council. Provide appropriate fire extinguishers etc and maintain at least annually. Ensure appropriate signage is in place. Ensure appropriate regulations/controls in hire documentation.	Annually	Low	Low	1	
330	Physical	Blocking/restricting fire evacuation routes	Ensure staff are aware of the need to maintain clear the fire exits. Caretakers to check on a daily basis	As and when	Low	Medium	2	
330	Physical	Poor/Faulty Office Furniture	Arrange periodical inspection of office furniture and fittings. Where appropriate arrange repair or replace.	Quarterly	Low	Low	1	
330	Technical	Defective Electrical Equipment/Machinery	Ensure maintenance agreement/contract in place where appropriate. Allocate responsibility for local repair/maintenance. Arrange regular inspection to ensure that any statutory obligations are met. E.g.PAT testing, 5 year electric test. Maintain appropriate records.	Monthly	Low	Low	1	

Completed by:

Date:

Position:

No of risks Scored

6

Average score:

1.3



LCRS 5. Risks report

Provision of Website/Internet Access

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to provide from 'free resource'

Requirement = To ensure proper financial provision

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Category	Description	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
11	Financial	Inadequate budget provision	Ensure service requirement included in annual budgetary process.	Annually	Low	Low	1	
148	Technical	Failure of Website/Internet Providers	Ensure a backup copy of data is maintained. Liaise with provider to ensure early reinstatement of	Weekly	Low	Low	1	

Completed by:

Date:

Position:

No of risks scored

2

Average score:

1.0



LCRS 5. Risks report

Public buildings and Village hall

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to provide buildings for offices and for public meetings

Requirement = To meet all statutory requirements for service provision

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Category	Aim	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value (> 3)	Your action required (> 3)
444	Administration/ Legal	Failure to obtain necessary licences	Determine responsibility for obtaining licences, maintain adequate records of applications, renewals etc.	Annually	Low	Low	1	
100	Administration/ Legal	Failure to complete user agreements	Determine responsibility for dealing with user applications. Completed agreement to be a pre-requisite of facility hire. Arrange periodical review of conditions of use etc.	Annually	Low	Low	1	
266	Environmental	Noise etc pollution	In lease where appropriate set conditions in hire documentation. Carry out regular site inspections. Maintain record of any complaints received and instigate prompt action where appropriate. Liaise with local enforcement agencies.	Annually	Low	Medium	2	
139	Financial	Failure to collect income	Determine responsibility for collection of income. Ensure that all income due to the Council and received is properly recorded. Arrange for prompt banking of all income. Follow defined procedure for reminders in respect of unpaid accounts. Take appropriate recovery action where necessary. Arrange appropriate internal audit testing. Council approval required for write-off on any bad debts.	Annually	Low	Medium	2	
267	Financial	Inadequate budget provision	Ensure that service/facility requirements are detailed in Budget process.	Annually	Low	High	3	
272	Financial	Failure to set/review charges	Ensure that all charges are reviewed annually as an integral part of the budgetary process.	Annually	Low	Medium	2	
271	Physical	Hazardous substances	Define responsibility for use and control. Provide for any necessary training. Provide for appropriate protective clothing. Ensure that any necessary licences, certificates for use have been obtained. Ensure that security is sound. Ensure that any disposals are properly dealt with. Maintain proper records.	Annually	Low	Medium	2	



LCRS 5. Risks report

Public buildings and Village hall

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to provide buildings for offices and for public meetings

Requirement = To minimize the risk of loss/damage arising from vandalism

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Category	Description	Review timing	Likelihood of occurrence	Impact on Council	Risk Value (> 3)	Your action required
269	Physical	Vandalism Ensure tenants maintain efficient and effective security. Maintain liaison with local enforcement agencies. Take action as appropriate against offenders.	Annually	Medium	Low	2	
267	Physical	Fire Ensure Health/Safety testing complete. Ensure appropriate staff training. Provide for strict security/control of combustible materials held by Council. Provide appropriate extinguishers etc. Ensure appropriate signage in place. Ensure appropriate regulations/controls in hire documentation.	Quarterly	Low	High	3	
268	Physical	Theft Determine responsibility for security with hirers. Ensure that security of all plant, equipment and premises is recognised as a priority. Provide for required staff training. Maintain register of assets. Maintain liaison with local enforcement agencies.	Annually	Low	Low	1	
265	Physical	Maintenance of buildings Define responsibility for maintenance. Carry out regular inspections of all buildings. Ensure that where appropriate proper contractual arrangements are in place. Arrange staff training where required. Maintain detailed records of all work scheduled/completed.	Annually	Low	Medium	2	
262	Physical	Security of premises and contents Define policy for security of premises and equipment. Allocate responsibility for security/control of equipment. Maintain asset register.	Annually	Low	Low	1	

Completed by:

Date:

Position:

No of risks scored

12	Average score:	1.8
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LCRS 5. Risks report Public Conveniences

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to provide

Requirement =

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
277	Administration/ Legal	No Service level agreement with Principal Authority	Ensure that all service level agreements are fully completed and operational. Monitor performance to ensure conditions met. Review conditions periodically.	Annually	Low	Low	1	
270	Financial	Inadequate budget provision	Ensure that service requirements are included in annual budget process.	Annually	Low	Low	1	
295	Financial	Failure to achieve desired standard of cleaning/hygiene	Arun District Council responsibility, but reflects on Council.	Daily	Medium	Low	2	

Completed by:

Date:

Position:

No of risks scored

3

Average score:

1.3



LCRS 5. Risks report Seats

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty =
Requirement = To safeguard against fire risk.
Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Your action required (> 3)
#	Physical	Fire	Ensure Health/Safety testing complete. Ensure appropriate staff training Provide for strict security/control of combustible materials held by council. Provide appropriate extinguishers etc. Ensure appropriate signage in place. Ensure appropriate regulations/controls adhered to.	Annually			
@	Physical	Injury or damage arising from use.	Carry out regular inspection of public seating & maintain records. Have necessary arrangements in place for repair/renewal. Ensure that appropriate insurance cover is held.	Annually			
ii	Technical	Provision of inadequate public seating	Ensure that all applicants wishing to provide public seating are provided with a copy of the council policy. Inspect all seats prior to acceptance to ensure required standards are met.	Annually			

Completed by:

Date:

Position:

No of risks scored:

0

Average score:



LCRS 5. Risks report Shelters & Seats

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to provide

Requirement =

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
0	Administration/ Legal	Inadequate budgetary provision	Ensure anticipated costs are provided for in budget setting process		Low	Low	1	
0	Administration/ Legal	Provision of inadequate standard of seating.	Determine Council policy for acceptance/provision of seating. Including where appropriate guidance on nominated/preferred suppliers. Arrange secure installation. Liaise with County re licenses	Annually	Low	Low	1	
0	Environmental	Vandalism	Maintain liaison with enforcement agencies. Determine policy for dealing with offenders.	Annually	Low	Low	1	
0	Technical	Inadequate maintenance of shelters and seats	Determine responsibility for maintenance of property. Arrange regular inspection and cleaning. Arrange repairs and maintenance as per programme or as required. Have arrangement in place to remove/replace dangerous equipment. Maintain records of repairs and maintenance.	Annually	Low	Low	1	

Completed by:

Date:

Position:

No of risks scored

4

Average score:

1.0



LCRS 5. Risks report Social media

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty =
Requirement = To Minimise Risk to Council and Public
Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
ii	Administration/ Legal	Non compliance with Data Protection Act	When posting or storing personal information on social media sites ensure permission is obtained and that the 8 principles of data protection have been followed.	Annually	Low	Low	1	
ii	Administration/ Legal	Lack of motivation for mangement of social media sites	Recognise risks associated with poor site maintenance and development - lack of users- lack of feedback - user dissatisfaction waste of resources. Arrange for regular review of content by more than one person not involved with keeping sites up to date. P & F and Members will have a monitoring role.	Annually	Low	Medium	2	
ii	Administration/ Legal	Placing Information on Social media that may put people at risk.	Ensure that all involved are aware of the risks involved when publishing information regarding individuals or groups of individuals. Implement a policy to follow best practice guidelines to protect those involved.	Annually	Low	Low	1	
ii	Administration/ Legal	Dependence upon an individual	Ensure that a minimum of 2 people have the necessary ability to undertake all input and monitoring of social media and are up to date with current practice. Provide training where necessary to minimise risk	Annually	Medium	Low	2	
ii	Technical	Inadequate control of Social media sites	Issue a set of written guidelines controlling social media sites	Annually	Low	Medium	2	

Completed by:

Date:

Position:

No of risks scored

5

Average score:

1.6



LCRS 5. Risks report Street/Footway Lighting

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to provide

Requirement = To ensure proper agreements in place

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
258	Administration/ Legal	Failure of Service level agreements with WSCC	Ensure that all service level agreements are fully completed and operational. Monitor performance to ensure PFI's conditions met. Review conditions periodically.	Annually	Low	Low	1	
265	Environmental	Vandalism	Maintain efficient and effective security. Maintain liaison with local enforcement agencies. Take action as appropriate against offenders.	Annually	Low	Low	1	
293	Environmental	Fly posting	Policy on fly posting as per street scene agreement. Maintain liaison with enforcement agencies. Take action as appropriate against offenders.	Annually	Medium	Low	2	
295	Environmental	Failure to provide lighting	Monitor Service Level Agreement with WSCC on a regular basis. Report any faulty lights as soon as possible. Monitor service arrangements/PFI with WSCC & their contractor on regular basis.	Annually	Medium	Low	2	
299	Financial	Inadequate budget provision	Ensure that service/facility requirements are detailed in budget process.	Annually	Low	Low	1	
287	Physical	Maintenance	Define responsibility for maintenance. Ensure contractual arrangements in place for renewal/repair WSCC to maintain detailed records of all work scheduled/completed.	Annually	Low	Low	1	

Completed by:

Date:

Position:

No of risks scored

6

Average score:

1.3



LCRS 5. Risks report Tourism

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to contribute to organisations encouraging tourism

Requirement =

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
0	Administration/ Legal	Not achieving required amount of Initiatives	CRC meetings.	Annually	Low	Medium	2	
0	Financial	Failure to deliver tourism objectives	Regular meetings of Community Resources Committee, who make Tourism decisions. Supervision meetings monitor progress & issues	Annually	Medium	Low	2	
205	Physical	Inadequate budget provision	Ensure that service requirement is included in annual budget process.	Annually	Low	Medium	2	

Completed by:

Date:

Position:

No of risks scored

3

Average score:

2.0



LCRS 5. Risks report Village Signs

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to erect (with Highway Authority approval)

Requirement =

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
01	Administration/ Legal	Failure to obtain necessary approval	Determine responsibility for administration. Ensure that appropriate applications are submitted to Highway Authority.	As and when	Low	Low	1	
02	Financial	Inadequate budget provision	Ensure service requirement included in annual budget.	Annually	Low	Medium	2	
03	Physical	Inadequate maintenance	Determine responsibility for maintenance. Arrange periodic inspection. Arrange for repairs/maintenance as required.	As and When	Low	Low	1	
206	Physical	Vandalism	Carry out regular inspection of signs. Maintain liaison with local enforcement agencies. Take action as appropriate against offenders.	Annually	Low	Low	1	

Completed by:

Date:

Position:

No of risks scored

4

Average score:

1.3



LCRS 5. Risks report War Memorials

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty = Power to maintain, repair, protect and adapt war memorials

Requirement =

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
4	Physical	Inadequate maintenance	Define responsibility for maintenance. Carry out regular inspections of memorials. Maintain detailed records of all work scheduled/completed	Annually	Low	Low	1	
208	Physical	Vandalism	Maintain security. Maintain liaison with local enforcement agencies. Take action as appropriate against offenders.	Annually	Low	Medium	2	
469	Physical	Inadequate budget provision	Review service provision within annual budget process.	Annually	Low	Medium	2	
Completed by: _____ Date: _____ Position: _____				No of risks scored	3	Average score:	1.7	



LCRS 5. Risks report Web Sites

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty =

Requirement = To ensure that the council is protected from charges of

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
11	Administration/ Legal	Risk arising from use of unlicensed software	The Council must ensure that only properly licensed software is used and must maintain records of all software used to build and manage the site.	Annually	Low	Low	1	
6	Administration/ Legal	The placing of information on site that may put people at risk	Ensure that all involved are aware of the risks involved when publishing information regarding individuals or groups of individuals. Formulate and implement a policy that follows best practice guidelines to protect those involved.	Annually	Low	Low	1	
11	Administration/ Legal	Non conformance with the Data Protection Act	Where posting information to web site, or storing personal information, ensure that permission is in place and the eight principles of data protection have been followed: The data must be; fairly and lawfully processed; processed for limited purposes; adequate, relevant and not excessive; accurate; not kept longer than necessary; processed in accordance with the data subject's rights; secure; and not transferred to countries without adequate protection.	As and when	Low	Low	1	
11	Administration/ Legal	Lack of motivation for continued management of website	Recognise risks associated with poor site maintenance and development - lack of users - lack of feed back - user dissatisfaction - waste of resources. Ensure that proper recognition is given to site manager. Arrange for regular review of site content, and development . P&F have close monitoring Role as do Members.	Quarterly	Medium	Low	2	
11	Administration/ Legal	Availability of Software tools to build and manage site	Anti virus software, image management software and a word processor. Software tools supplied by Arun District Council and Tan Westlake for Visit Littlehampton Website	As and when	Low	Low	1	
11	Administration/ Legal	Dependence upon an individual	Ensure that a minimum of two people have the necessary ability to undertake all website activity and are up to date with current site status. Provide training where necessary to minimise risk.	Annually	Medium	Low	2	



LCRS 5. Risks report Web Sites

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty =

Requirement = To ensure that council has full control of website

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
ii	Administration/ Legal	Ownership and Control of Universal Resource Locator (URL)	Ensure that the Town Clerk to the Council is listed as registrant of the website. Ensure that hosting charges and domain renewal charges are met by Council. Ensure that details are held of the web address, account name, user name and password to manage the web address.	Annually	Low	Low	1	
157	Administration/ Legal	Innapropriate content	Ensure that all general design is specifically approved by Council & Events & Publicity Manager, who regularly reviews whole site.	Weekly	Low	Low	1	
ii	Administration/ Legal	Confusion arising from links to external websites	Ensure that adequate control is in place and that website makes clear Council privacy policy that it is not responsible for the privacy practices or the content of external Web sites.	Annually	Low	Low	1	
ii	Administration/ Legal	Compromise of copyright by inclusion of website links or frames	If website contains links to other sites ensure permission of destination website is prerequisite where appropriate - most are public authorities etc.	Annually	Low	Low	1	
ii	Administration/ Legal	Non compliance with Freedom of Information Act	Ensure that legal requirements are met in full. Ensure that ALL information, as declared in the Council Model Publication Scheme (MPS), is available via the Town Clerk and alternatively via the web site.	Annually	Low	Low	1	
ii	Technical	Inadequate control of web site	Issue a set of written guidelines controlling site content.	Annually	Low	Low	1	
ii	Technical	Risk arising from poor design/appearance of web site	Ensure that design is undertaken by suitably qualified and experienced operators. (ADC & Tann Westlake) Get details of and view previously developed sites. Set standards for site design and ensure that Council is provided with full details prior to implementation.	As and when	Low	Low	1	



LCRS 5. Risks report Web Sites

Littlehampton Town Council Assessment for year 2018 To 2019

Your Duty =

Requirement = To minimise risk.

Aim =

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
11	Technical	Failure to meet needs/expectations of visitors to site	Arun District Council design & develop LTC site. Tann Westlake design & develop Visit Littlehampton Site. Maintain a record of all views, comments, complaints received. Carry out a regular review of the web site, with third parties where appropriate and initiate agreed changes/improvements where necessary. Maintain dialogue with site visitors where appropriate through 'contact us' sections on Websites.	Annually	Low	Low	1	

Completed by:

Date:

Position:

No of risks scored

14

Average score:

1.1



LCRS 5. Risks report Youth Service Provision

Littlehampton Town Council
Assessment for year 2018 To 2019

Your Duty =
Requirement =
Aim = To be committed to the ongoing provision of services to

Scoring note:
Low = 1,
Medium =2
and High =3

Ref	Risk	Hazard	Control	Review timing	Likelihood of occurrence	Impact on Council	Risk Value	Your action required (> 3)
ii	Administration/ Legal	Failure of Arun Community Church to deliver contract	Arun Church to provide monthly written report including performance metrics. The quality of the Service and the effectiveness of the activities run as part of the Service by Arun Church will also be monitored jointly by Arun Church and the Town Council through regular bi-monthly meetings and an annual review meeting. Arun Church agrees to attend at least one Town Council committee meeting per annum to report on the Service and budget if required. Arun Church will demonstrate through reporting the benefit of the Service to local young people.		Low	Medium	2	
ii	Financial	Inadequate budget provision	Ensure anticipated costs are provided for in budgetary process. CRC to approve any unexpected expense.		Low	Low	1	
ii	Financial	Loss of assets	Arun Church shall supply an inventory of equipment and assets held at the end of each financial year.		Medium	Low	2	

Completed by:

Date:

Position:

No of risks scored

3

Average score:

1.7

STRATEGIC POLICIES & RISK (2018/19)

EXTERNAL SERVICES

1. Allotments

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
To meet, where practical and reasonable, demand from the community for allotments.	Failure to meet the Duty on local councils.	2/1	1/1	<ul style="list-style-type: none"> • Development land availability • Effective management of waiting list 	ATC/TC
To work closely with the Littlehampton Allotments & Leisure Gardens Association (LALGA) to ensure that the needs and views of the plot holders are considered.	Council will be less well informed when making decisions and lose its ability to communicate on a regular basis with plot holders.	2/1	1/1	<ul style="list-style-type: none"> • LALGA • CRC • Allotments Working Group (AWG) • Allotment inspections in partnership with LALGA 	ATC
To review rents for allotment plots annually and to notify plot holders at least 12 months in advance of any increase.	Budgetary/ loss of income.	2/1	1/1	<ul style="list-style-type: none"> • Committee/ AWG Meetings • Allotment software • Trained administration • Comparison with other Parishes/Allotment providers 	ATC
To work with plot holders to promote “green” initiatives and practices.	Reputation meeting Council objectives.	1/1	1/1	<ul style="list-style-type: none"> • AWG/LALGA 	ATC

To keep the allotment sites neat and tidy, ensuring that open areas and unlet plots are kept in good order.	Lack of take up of allotment sites as not attractive or good for growing and impact on neighbouring plots. Tenants complain to LTC	2/1	1/1	<ul style="list-style-type: none"> • Amenity Team management • Monthly Site visits/inspections • Reporting Structure 	DTC/ATC
To seek new provision for additional allotments as a result of new housing developments.	Failure to meet the Duty on local councils.	2/1	1/1	<ul style="list-style-type: none"> • Development land availability • Working with District on new developments 	TC
To only let plots to residents of Littlehampton. Existing Plots let to non-residents to be continued until the agreement ends.	Availability for residents will be reduced	1/1	1/1	<ul style="list-style-type: none"> • Postcode check on applications • Maintain clear promotional information 	ATC

2. Parks, Gardens, Roundabouts & Street Scene

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
To maintain Rosemead Park, Town Centre Roundabouts, the War Memorial and all other Town Council owned or maintained open spaces as valuable community resources.	Without regular maintenance, the sites could quickly become unsafe and unattractive, leading to possible litigation and longer term major expenditure.	2/1	2/1	<ul style="list-style-type: none"> • Reporting system • Playground monitoring • Daily checks & monitoring sheets to generate job tickets • Rolling schedule of work • Monitor contract for planting 	ATC/DTC

To provide an attractive environment in and around the town for both visitors and residents.	Complaints from residents and reduction of visitor numbers.	2/1	2/1	<ul style="list-style-type: none"> • Reporting system • District/County Liaison • Street Scene Enhancement Scheme • Monitor contract for planting 	ATC/DTC
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3. Street Lighting

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
<p>To ensure the good maintenance of the Town Council's street lighting.</p> <p>Wherever possible to pass responsibility for LTC Street Lights to WSCC, relevant residents' associations or private landlords</p>	<p>Crime or risk of accident in unlit areas</p> <p>none</p>	1/1	1/1	<ul style="list-style-type: none"> • Reporting/ Recording system • County Liaison/ • PFI Scheme • A Team 	TC

4. Community

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
<u>Regeneration</u>					
To support and promote a vibrant and prosperous Town.	Degeneration and devaluation of the town and its assets.	3/1	2/1	<ul style="list-style-type: none"> Working with all key stakeholders Adequate budgetary provision. 	TC/CM
To work in partnership with public, private and voluntary sector bodies to attract investment to the Town.	As above, but also not understanding or being aware of relevant issues.	3/1	2/1	<ul style="list-style-type: none"> Working with all key stakeholders 	TC/ATC/CM
To exhort the principal authorities to prioritise the need to support and encourage the retail offer in the town centre to ensure its continuing health and the long-term future of the town.	As above	3/1	1/1	<ul style="list-style-type: none"> Adequate budgetary provision. Close liaison with County & District Liaison with Voluntary Action Arun & Chichester Liaison with Police & Town Traders 	TC/CM
Assist residents to form community Groups & Residents' Associations	none				

<p><u>Community Safety</u></p> <p>To work with the Police and other relevant agencies to make Littlehampton a safer place.</p>	<p>Increased crime and anti-social behaviour and Town Council not being seen to be addressing key public concern.</p>	2/1	2/1	<ul style="list-style-type: none"> • Liaison meetings • Reports to Committee • Youth Provision 	TC/ATC/CM
<p>To facilitate access to the Police for all of the Community.</p>	none				
<p><u>Grants and Community Organisations</u></p>					
<p>To prioritise, within the budget, funding for local community groups, either through Service Funding Agreements or through general community grants.</p>	<p>The collapse of the local voluntary sector and subsequent impact on demands on local council and principal authority budgets.</p>	3/1	2/1	<ul style="list-style-type: none"> • Committee • ATC, role with Community Groups 	ATC
<p>In doing this the Town Council will:-</p> <ul style="list-style-type: none"> • Assist local organisations to achieve their respective aims and objectives where these benefit the Town and the local community. • 'Pump-prime' initiatives to enable schemes to emerge, whilst not committing to long 	<p>Budget limitations mean that the impact level of the LTC funding is reduced and voluntary services cannot continue.</p>	2/1	1/1	<ul style="list-style-type: none"> • Committee • ATC, role with Community Groups • Events Forum • Sports Forum 	ATC/EM

<p>term revenue support.</p> <ul style="list-style-type: none"> • Assist community groups to attract funding from local and national organisations to benefit local residents. • Identify, on occasions, specific needs and apply resources to meet them. • Provide Service Funding Agreements where appropriate, to assist with sustainable service provision. • Restrict eligibility so that any organisation can only receive one grant per calendar year. (Other than for SPACE Grants) 	<p>Lack of facilities for community groups and local people</p>	<p>2/1</p>	<p>2/1</p>	<ul style="list-style-type: none"> • Committee • ATC • District liaison • Town facilities study • Liaison with local developers • Public pressure 	<p>TC/ATC/MP</p>
<p><u>Community Centres</u></p> <p>To provide a high-quality community facility in the town centre.</p> <p>To provide, as part of the North Littlehampton development, a high-quality community centre as a focal point of that development.</p>					

5. Press & Publicity

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
To provide quality information through a range of media, including the website; press releases; notice boards and the Progress Newsletter; including Social media such as Facebook.	Inadequate consultation and an uninformed public.	3/1	2/1	<ul style="list-style-type: none"> P&F Public feedback 	TC/CM
To actively promote all of the Councils assets to maximise use and income.	Rates charged may not be competitive	1/1	1/1	<ul style="list-style-type: none"> Seeking all opportunities or appropriate sponsorship/partnerships 	CM

6. Museum

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
To provide a high-quality Museum facility to promote and preserve Littlehampton's cultural heritage.	Lack of local cultural heritage on public display Loss of visitor attraction Loss of art exhibition facility	2/1	1/1	<ul style="list-style-type: none"> Committee Public feedback County liaison Littlehampton History Society Qualified Curator Accreditation Littlehampton Heritage Group 	ATC

7. Arts, Sports & Events

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
<p><u>Community Arts</u> To deliver an innovative programme of community art activities to help local people to express their creativity, imagination and self-expression through all art media, provide a showcase opportunity for local artists and enable local people to develop their artistic skills through signposting and support.</p>	<p>Cultural offer of Littlehampton would be limited Artists may seek opportunities in other Towns, reducing the cultural offer for residents and visitors</p>	2/1	1/1	<ul style="list-style-type: none"> • Committee reports • ATC • Creation and delivery of a diverse program of events • Museum Arts & Exhibition programme • Inclusion in Event Programme of Town • Littlehampton Organisation of Community Arts • Small Arts Grants • Service Funding Agreements 	ATC/EM
<p><u>Community Sport</u> To support the development of a programme of sporting, recreational and physical activities to enable local people to experience new sports and activities and to keep fit and healthy. These programmes will be both universally accessible</p>	<p>People with limited access to sporting opportunity could be further marginalised. Reductions in healthy lifestyles</p>	2/1	1/1	<ul style="list-style-type: none"> • Sports Forum • Committee reports • Service level agreements with local sports clubs • ATC support with local groups • General & Sports Excellence grants • Arun Youth Project 	TC/EM ATC

<p>and targeted at specific communities</p> <p><u>Community Events</u> The Town Council will facilitate, sponsor, support and provide a timetable of community events both universal and targeted to celebrate Littlehampton and the different special interests and social groups of the community.</p>	<p>Lack of opportunity to showcase the diversity of the Town and for the community to participation in local events.</p>	<p>2/1</p>	<p>2/1</p>	<ul style="list-style-type: none"> • Public feedback • Committee reports • ATC liaison with groups • Significant events budget • Extensive events programme • Annual Town Show • Public feedback 	<p>TC/ EM</p>
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8. Tourism

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
To work with relevant authorities, local tourist attractions and related businesses to promote tourism.	Reduced income for the town Lack of profile for Littlehampton as a visitor destination Degeneration of the town	3/1	1/1	<ul style="list-style-type: none"> • Committee reports • Local liaison • Working with ADC • Advertising • Tourism initiatives • Visit LA Website 	TC/EM/CM

9. Public Conveniences

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
To retain and improve the Town's public conveniences	Lack of facilities for local people and visitors. Reduction in Tourism (No longer within the direct control of LTC from April 2015)	3/1	1/1	<ul style="list-style-type: none"> • Monitoring District proposals 	TC/DTC

10. Planning & Transportation

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
<p><u>Planning Applications</u> To deal efficiently and openly with planning applications when being considered as part of the District and County Councils consultations.</p>	The local voice not being heard and considered when planning applications are decided by District or County.	3/1	2/1	<ul style="list-style-type: none"> • Committee • Committee Training- keeping updated • Regular liaison with ADC 	ATC/MP
To seek high standards of planning design and build, retaining the high quality of the conservation areas and significant buildings in Littlehampton.	An unattractive and badly-planned Town.	2/1	1/1	<ul style="list-style-type: none"> • Working with planning authority on Local Plan • Community Liaison Group • Civic Society • Committee • Neighbourhood Plan • Community asset registration • Littlehampton Heritage Group 	TC/ATC/MP
To deliver, where possible and in conjunction with the community, the key objectives of the Littlehampton Neighbourhood Development Plan.	Loss of reputation for leadership. Possible loss of community ownership for new developments	2/1	1/1	<ul style="list-style-type: none"> • Regular oversight of Neighbourhood Plan by Planning & Transportation Committee 	TC/ATC/MP

<p><u>Strategic Planning</u> To ensure that the Town Council is involved in the development of major planning initiatives so that the voice of the town is heard and that local people are given the opportunity to be consulted and involved at an early stage.</p>	<p>The local voice not being heard and considered when major planning applications are decided by District or County. Lack of Community involvement.</p>	2/1	1/1	<ul style="list-style-type: none"> • Public consultation and Forums • Committee • Liaison with District and County 	TC/ATC/MP
<p><u>Transportation</u> To promote sustainable transport networks and cycle routes.</p>	<p>Accessibility to key facilities reduced. Congestion; environmental damage and impact on tourism</p>	2/1	1/1	<ul style="list-style-type: none"> • Working with County & District on S.106 agreements 	ATC/MP
<p>To press for improved traffic management in the Town.</p>	<p>As above + impact on local economy</p>	2/1	1/1	<ul style="list-style-type: none"> • JEAAC • Liaison with County 	ATC
<p>To support the need for a Town Bus, addressing severance issues from the North of the Town and to provide access to key services and facilities.</p>	<p>As above + loss of North – South connectivity adding to severance issues in North of Town.</p>	3/1	2/1	<ul style="list-style-type: none"> • Budget financing • Liaison with developers and principal authorities • Committee monitoring. • Public consultation 	TC/ATC/MP/CM
<p>To align services with new developments with the Town, through the use of S106 agreements.</p>	<p>none</p>				

11. Youth Services

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
<p>To be committed to the ongoing provision of services to support the development of children and young people.</p> <p>To offer a range of targeted and universal services offering constructive activities, information and support for 8-25 year olds at a number of venues throughout the Town, enabling them to develop the knowledge, attitudes and skills they need to become competent, caring and contributing adults.</p>	<p>Loss of facilities for young people in Littlehampton</p>	3/1	2/1	<ul style="list-style-type: none"> • Committee • Liaison with Youth Service and voluntary sector • Budgetary provision • Review of Service • Monitoring Contract • SPACE Grants • Events Programme 	ATC/EM
<p>Partnerships will be pursued to extend these services and develop new ones which support the development of the wider community including provision in North Littlehampton.</p>	<p>As above and financial impact on LTC</p>	2/1	1/1	<ul style="list-style-type: none"> • Committee reports • County Liaison • Community Liaison 	TC/ATC

<p>To replace Project 82 with a modern youth facility, working, where possible, with voluntary, public and private sector partners.</p>	<p>Increased maintenance costs at Project 82 and fall off attendance due to a rundown facility.</p>	<p>2/1</p>	<p>1/1</p>	<ul style="list-style-type: none"> • Committee reports • County Liaison • Community Liaison 	<p>TC/ATC</p>
<p>To support and work with local youth organisations to provide as wide a range of youth provisions as possible.</p>	<p>Loss of cohesive approach to the provision of youth facilities, leading to increased costs and duplication</p>			<ul style="list-style-type: none"> • Community Liaison 	<p>ATC</p>

INTERNAL SERVICES

1. Property

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
<p>Manor House To maintain the Manor House in line with its civic importance within the town, its listed building status and its location within a conservation area.</p> <p>To provide a high-quality Community Centre on the Manor House site, when funding permits. (Subject to a decision on the helm as set out in Council priorities.)</p>	<p>Reputation Loss of Civic Asset Future budgetary implications if left to deteriorate.</p> <p>Loss of key facility in the town centre. Loss of Income for the Town Council</p>	<p>2/1</p> <p>2/1</p>	<p>2/1</p> <p>1/1</p>	<ul style="list-style-type: none"> • Committee reporting • Sufficient Budgetary provision • Programmed maintenance • Oversight by Property & Personnel Committee of building plans, proposals and community centre strategy. 	<p>TC/DTC/MP</p> <p>TC</p>

2. Property Maintenance

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
To make responsible provision to secure and maintain Town Council capital assets to a high standard that complies with legislation for public buildings including Health & Safety requirements.	<p>Reputation Future budgetary implications if left to deteriorate Health & safety of staff and public Closure of public rooms & museum Loss of income from room hire</p>	2/1	2/1	<ul style="list-style-type: none"> • Committee reports • H&S Policy • Building maintenance planning • Sufficient Budgetary provision 	TC/DTC

3. Finance

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
To prepare financial statements in accordance with applicable laws & regulations, which are currently found in Governance & Accountability in Local Councils (England)- A practitioner's guide.	Adverse Auditor's certificate	3/1	2/1	<ul style="list-style-type: none"> Qualified RFO CPD Committee Internal & external Auditors 	RFO
To ensure that the financial statements present fairly the financial position of the Council.	Adverse Auditor's certificate	3/1	2/1	<ul style="list-style-type: none"> As above 	RFO
To keep proper accounting records ensuring that all financial resources and fixed assets are managed efficiently, effectively and equitably.	Adverse Auditor's certificate Reputation in Community. Loss of assets. Improper use of funds.	3/1	2/1	<ul style="list-style-type: none"> As above Budget Reports to Committee Robust budget setting and monitoring 	RFO
To manage prudently the Town Council's treasury balances.	Financial loss- future budgetary impact	3/1	2/1	<ul style="list-style-type: none"> Committee Annual review of Investment Strategy 	RFO

4. HR/Training

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
To ensure that comprehensive employment policies and procedures are in place.	Litigation Employment Tribunal Injury to staff Retention of staff	3/1	2/1	<ul style="list-style-type: none"> Regular reviews & Update of HR Policies Staff Training/ induction/ Appraisals 	DTC

5. Democratic Representation/ Corporate Management

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
To provide a transparent and high quality structure for effective decision making.	Democratic deficit Poor decision making process	3/1	3/1	<ul style="list-style-type: none"> Council Management Clear reports 	TC/DSM
The Town Council will always take a position representing the best interests of the town and the Council,		3/1	1/1	<ul style="list-style-type: none"> Council/ Committee Access for public to Council/Committees 	TC/DSM
To work to achieve the devolution of services, where service improvements can be made, whilst not disadvantaging local residents and avoiding double taxation.		2/1	2/1	<ul style="list-style-type: none"> Council Working with District/ County 	TC/DSM

SECTION 4 GENERAL AND MISCELLANEOUS

1. Local Businesses

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
The Town Council will encourage the use of local business in all of its services.	Businesses may not wish to engage with LTC. Closure of businesses	3/1	1/1	<ul style="list-style-type: none"> • Representation on trader's partnership • Utilising local contractors where possible • Sponsorship opportunities 	TC/CM/EM/DTC

2. Littlehampton Harbour

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
To recognise the historical and practical importance of the Town developing a leisure-based harbour and other financially-robust river-related industry.	Town Council support vital to regeneration of harbour/ riverside.	2/1	1/1	<ul style="list-style-type: none"> • Committee • Liaison with District /County Councils and harbour Board 	TC/ATC

3. General Health and Wellbeing Policy

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
To work with the relevant agencies to support and improve health provision in the Town & secure additional & high quality medical facilities.	Insufficient budget available to deliver schemes. Growing populations health needs remain unmet or poorly serviced	2/2	1/1	<ul style="list-style-type: none"> Public consultation Liaison with District /County Councils and Health Authority 	TC

4. Coastal Defences

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
To work closely with the relevant bodies to pursue adequate provision for Coastal Defences and Flood Management to protect the Town from flooding.	Town Council is important lobbyist – flooding key issue for Littlehampton residents and businesses.	2/1	1/1	<ul style="list-style-type: none"> Liaison with District & County Civic Society/ Littlehampton Flood Action group Flood action & resilience plans. 	TC

5. Equality and Diversity and Disability

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
To maintain an Equality and Diversity Policy, which will regularly be reviewed.	Litigation Reputation Inaccessible services	3/1	3/1	<ul style="list-style-type: none"> • Committee • Staff training • Equality & Diversity Policy made known to staff, Councillors & on website • Compliance with law 	TC/DTC
To ensure that all Town Council amenities and services comply with Disability Discrimination legislation.	Litigation Lack of access to all	3/1	1/1		

6. Health and Safety

POLICY	IDENTIFIED RISK	SR	OR	CONTROLS	NOMINATED PERSON
		I/L	I/L		
To have a Health and Safety Policy and Accident Reporting Procedure. The Policy and reporting procedure shall be regularly updated.	Litigation Staff Injury Unreported accidents and injuries	3/1	3/1	<ul style="list-style-type: none"> • Committee • Management • Staff training/ Induction • Regularly reviewed & updated H & S Policy • Regularly reviewed accident books 	TC
	New risks not identified or existing risks not updated, resulting in Litigation, Staff Injury and unreported accidents and injury				TC

Key

		NOMINATED PERSON		RISK SCORE
SR	Strategic Risk	TC	TOWN CLERK	1 = Low
OR	Operational risk	DTC & RFO	DEPUTY TOWN CLERK & RESPONSIBLE FINANCIAL OFFICER	2 = Medium
I/L	Impact/Likelihood	ATC	ASSISTANT TOWN CLERK	3 = High
		EM	EVENTS MANAGER	
		MP&DSM	MAJOR PROJECTS & DEMOCRATIC SERVICES MANAGER	
		CM	COMMUNICATIONS MANAGER	

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Peter Herbert
Town Clerk
Date

.....
Laura Chrysostomou
Deputy Town Clerk & Responsible Financial Officer
Date

SR=Strategic Risk; OR=Operational Risk; I/L=Impact/Likelihood; TC=Town Clerk; DTC/RFO=Deputy Town Clerk & Responsible Financial Officer; ATC=Assistant Town Clerk; EM=Events Manager; CM=Communications Manager; MP&DSM= Major Projects & Democratic Services Manager;

LITTLEHAMPTON TOWN COUNCIL

Non- Confidential

Committee: Governance and Audit

Date: 6th February 2018

Report by: The Town Clerk

Subject: Complaints and Compliments Review 2017

1. Summary & Background

- 1.1 The Town Council places a high value on the information that these records provide as a means of gauging service levels and performance standards. Following an extensive review of the Town Council's procedure for handling complaints in February 2016, the procedure and system for recording and analysing this information was updated.
- 1.2 An annual report of the complaints and compliments, including a description of the matter and how it was resolved is presented to this Committee in accordance with its delegated oversight of Performance and Standards. The information for the period January to December 2017 is attached to this report (Appendices A and B) for review.

2. Recommendations

The Committee is RECOMMENDED to:

To consider and note the summary of complaints and compliments in 2017.

Peter Herbert
Town Clerk

Appendix A

Date	Compliment	Date of Acknowledgment
17.02.17	Trinidad fencing is very good and pleased it has been done	17.02.17
18/05/2017	Good that we now get bus up Arundel Road & stops where you want it to stop, drivers very helpful, he is very happy with the new 15 bus	18/05/2017
17/07/2017	Well done to the A Team for the lovely flowers around	17/07/2017
10/08/2017	Wedding Ceremony- Was a really good experience and on the day we didn't have to do anything but turn up which was lovely. Thank you so much for making the day so good and special	10/08/2017
12/08/2017	Wedding Ceremony - I arrived at the time stated by the Ceremonies Team (20 minutes before the start of ceremony). As I sat at the bottom of the stairs finalising my paperwork, guests were arriving which meant they saw me before I made my entrance which I felt spilit it. They felt the same way too.	12/08/2017
21/08/2017	As a relative newcomer to Littlehampton, may I pass on my praise for the several impressive floral displays which brighten up various spots around the town.	21/08/2017
01/10/2017	Wedding Ceremony - Great people made our day thanks :)	01/10/2017
29/10/2017	Thanks & praise to all involved in organising the Town Show & Family Fun Day	29/10/2017
03/10/2017	Complained on 20/9/17 & wanted to say thanks for dealing with & resolving complaint	03/10/2017

13/10/2017	Just wanted to say thank you for the great event last night. We are very lucky to have such a supportive Town Council who understand the importance of grants & sports awards	03/10/2017
13/06/2017	Just a quick email to say that caretaker has been absolutely brilliant with setting up the room for our use. The building is a perfect venue and once we settled down we will be in touch for next year's series.	13/06/2017
20/10/2017	We would like to thank the surrounding plot holders for making us feel very welcome and wish them all the best for the future and to the council for giving us the opportunity to 'grow our own'. It was a very pleasurable experience.	20/10/2017
19/10/2017	Hello & just to thank you for your help earlier today - I look forward to returning to the offices next week to collect a relocation 'new mover's' pack, thank you,	19/10/2017
16/10/2017	I am writng to congratulate you all for the very professional manner in which you conducted yourselves on Saturday at wedding ceremony. We were suitably impressed with your organisational skills and overall presentation of the venue.	23/10/2017
24/10/2017	Resident: what a great job we are doing looking after the park	24/10/2017
30/11/2017	Excellent all round (Meeting)	30/11/2017
01/12/2017	Great Training Room	01/12/2017
04/12/2017	Thank you for the wonderful Christmas Decorations - even better than last year	04/12/2017
20/12/2017	Thank LTC for removing grafitti so promptly	20/12/2017

Appendix B

Date	Nature of Complaint	Date of Initial Acknowledgment	Date of Response	Complaint Action
12/01/2017	Rosemead playground no access allowed	12/01/2017	12/07/2017	Amenity Team advised resident that resurfacing works were being carried out therefore access was temporarily restricted .
24/01/2017	Worthing Road rats on allotment current plotholder overfeeds chickens	24/01/2017	24/01/2017	Reported to Pest Control at ADC for action.
07/02/2017	Concern raised over coach parked outside Littlehampton Museum due to school trip coming to explore Museum.	07/02/2017	07/02/2017	Museum staff looked into this, it had not been reported by LTC. Informed Complainant who was happy to bring coaches for future school trips.
20/02/2017	Plot Mill Lane overgrown	20/02/2017	20/02/2017	Reported to Assistant Town Clerk and investigated at next inspection
14/03/2017	Plot WR Lots of rats seen in chicken run	14/03/2017	14/03/2017	Reported to Pest Control at ADC for action.
03/04/2017	Plot Mill Lane plastic put down is now disintegrating and blowing everywhere.	03/04/2017		Reported to A Team and resolved
03/04/2017	Complained about foxes squashing new potato mounds. Also reported rats on 202, 203A & 208	03/04/2017	03/04/2017	Reported to Pest Control at ADC for action.
11/04/2017	Complaint regarding the no15 bus service replacing the no12 service	12/04/2017	12/04/2017	E-mail sent acknowledging complaint with explanation of change. Copy also sent to Compass Travel
13/04/2017	Complaint re unsuitable route - Mill Lane and Toddington Lane for No15 bus service	13/04/2017	13/04/2017	E-mail sent acknowledging complaint with explanation. Copy also sent to Compass Travel
18/04/2017	Complaint (2nd Time) foxes unearthing his potatoes and damaging netting	18/04/2017	18/04/2017	Acknowledged complaint and passed to Assistant Town Clerk - recorded on file.
19/04/2017	Complaint that compost at Mill Lane does not mulch down & worried about the content	19/04/2017	19/04/2017	Acknowledged complaint and passed to LAGA for their attention
19/04/2017	Plot Mill Lane plastic put down is now disintegrating and blowing everywhere. Dandelions about to seed etc	19/04/2017	19/04/2017	Acknowledged complaint . A Team inspected and resolved.
21/04/2017	Complaint about foxes	21-Apr-17	21-Apr-17	Acknowledged complaint and passed to Assistant Town Clerk - recorded on file.
24/04/2017	Complaint about ML overgrown & seeding & bath on plot with rubbish in	24/04/2017	24/04/2017	Acknowledged and checked at Inspection in May
24/04/2017	Complaint expressing dissatisfaction with photo of children in army uniform in What's on in L'ton guide	24/04/2017	24/04/2017	Rationale for photo explained and apologised. Discussed the wider themes of Armed Forces Day & supporting Armed Forces Personnel. Noted for future event in publicity.
27/04/2017	Complaint about foxes destroying plants & veg digging 6 holes since weekend	27/04/2017	27/04/2017	Acknowledged complaint and information placed on file.
06/05/2017	Complaint about vehicle congestion on Tideway due to event goes in Mewsbrook Park parking on road.	08/05/2017		Resident thanked for bringing the issue to our attention Info to be used in publicity to encourage visitors to use seafront car parks. Comments also passed to Friends of Mewsbrook Park who also organise events in the park.

08/05/2017	Unhappy with cessation of No 12. Cannot get into do shop now. Angry with the decision. Says we should of considered a reduced bus service if monies not available. It was a well used service	08/05/2017		E-mail sent acknowledging complaint with explanation of bus service funding . Copy also sent to Compass Travel
15/05/2017	Small complaint that the price for the Lifeboat Concert detailed in the Summer edition of Progress was incorrect	15/05/2017		Acknowledged and noted.
15/05/2017	Accidental damage to bean fence was broken & corner post marking boundary broken when plot rotovated by LTC	15/05/2017	15/05/2017	Apologies to plot holder - A Team repaired.
17/05/2017	Water Butt near allotment has been used to wash paint brushes and the water is now all red	17/05/2017	18/05/2017	Taken up with the plot holder in question . LTC satisfied that it wont happen again. Complainant advised.
22/05/2017	Youths reported stealing onions from plots at Worthing Road	22/05/2017	22/05/2017	Thanked for bringing it to our attention. And advised to contact Police
30/05/2017	Reported altercation with persons who climbed over fence from WR Rec, fence down and repairs requested	30/05/2017		A Team to attended and fixed the fence
02/06/2017	Complaining about not being able to get into allotments at Mill Lane due to the queue for the tip	02/06/2017	02/06/2017	Acknowledged complaint - due to Tip times changing. Advised of Cabinet Member's contact details at WSCC if they wished to pursue complaint
02/06/2017	Complaint regarding access to the Mill Lane Allotments due to queuing traffic for the tip. Concerns about access for Ambulances and duty of care the TC have to allotment holders.	02/06/2017	02/06/2017	Acknowledged complaint - due to Tip times changing. Advised of Cabinet Member's contact details at WSCC if they wished to pursue complaint
05/06/2017	Letter asking to stop foxes digging holes on allotment	05/06/2017	06/06/2017	Letter acknowledging complaint and recorded on file
13/06/2017	Door bell not working at Southfields for class	13/06/2017	13/06/2017	Bell tested & found to be working. Phoned customer and asked to contact us again if the bell isn't working.
18/07/2017	Quad bikes & bee complaint	19/07/2017	19/07/2017	Email acknowledgement attaching information leaflet
14/08/2017	Complaint regarding the attitude of a bus driver Number 15 bus Friday 11th August	15/08/2017	15/08/2017	Passed to Compass Bus Company for investigation and apology sent
14/08/2017	Complaint re Number 15 bus route and connections to it ,other matters regarding Kinlev Gate footways.	16/08/2017	16/08/2017	Letter acknowledging complaint sent & recorded on file
21/08/2017	Bought in some potatoes that had been scraped & ruined by foxes, has lost most of potato crop	21/08/2017	21/08/2017	Noted by Assistant Town Clerk
22/08/2017	Complaint re weeds coming from Plot and general neglect of plot	22/0/2017	22/08/2017	Assistant Town Clerk noted and investigated further at next inspection
29/0/2017	Complaint re Litter, young boys drinking alcohol. Bikes scooters and roller bladers on walkway and no signage prohibiting such.	29/08/2017	29/08/2017	Forwarded to Arun District Council for response
11/09/2017	Complaint about Town Show, like a ploughed field, couldn't push wheelchair, couldn't park anywhere, had to abandon entering stuff into Town Show competition.	11/09/2017	11/09/2017	Acknowledged and noted for future events
13/09/2017	It was reported that hedge trimmings were thrown over fence at Trinidad allotments by LTC	13/09/2017	13/09/2017	Matter investigated and A Team removed debris next day
20/09/2017	It was reported that A Team vehicle had caught boards lining a plot at Mill Lane	20/09/2017	21/09/2017	Matter investigated and A Team repaired damage and apologised
29/09/2017	Complained that plot holder is bringing up soil from elsewhere & this will contaminate the land	29/09/2017	29/09/2017	Assistant Town Clerk investigated

11/10/2017	E-mail regarding inconsiderate parking at the end of Stanhope Road	11/10/2017	11/10/2017	Passed to ADC and advised contact WSCC
17/10/2017	Complaint about new bus route outside house	17/10/2017	17/10/2017	Passed to Town Clerk for response. Letter acknowledging complaint and detailed explanation of bus routes and funding
18/10/2017	Had spoken to ADC requesting a dog bin & was told it was LTC & asked if we could contact ADC	18/10/2017	18/10/2017	Town Clerk to contact ADC
25/10/2017	Complained about contractors using gate & why hadn't they made a new entrance up the road	25/10/2017	25/10/2017	Rang to explain arrangements that had been agreed regarding contractors accessing the site.
16/11/2017	Complained about black smoking bonfire	16/11/2017	16/11/2017	Amenity Team investigated and resolved
21/11/2017	Complained about deer eating fennel	21/11/2017	21/11/2017	Reported to Assistant Town Clerk and noted. Being monitored
21/11/2017	Complained that plot was overgrown & not being worked	21/11/2017	21/11/2017	Reported to Amenity Team to check condition at next inspection
24/11/2017	Complaint about the noise from the Stage /lorry parking /all day and into the evening from the Xmas Light Switch on.	27/11/2017	27/11/2017	Letter sent acknowledging complaint and apologising for disruption and failing to inform. Looking into other options in the future

GOVERNANCE AND AUDIT COMMITTEE WORK PLAN 2018/19

Description	* Frequency	Date of last review	Due Date	Date of Next review
Annual Governance Review incorporating: a) Members Code of Conduct b) Register of Members' interests c) Scheme of Dispensation	Annually / dictated by changes to legislation	October 2014	Report this meeting	Feb.2019
Standing Orders	Quadrennially	March 2017 (n/c)	March 2019	Feb. 2019
Scheme of Delegation	Annually	March 2017 (n/c)	July 2018	July 2019
Review Financial Regulations	Every 2/3 years	March 2017 (n/c)	March 2018/19	March 2021/22
Annual Governance Statement	Annually	March 2017	To Council with Annual Return	March 2018
Internal Audit Report	Periodic	July 17	Report to this meeting	July 2018
Review List of Internal Control Systems	Annually	Feb 17	Report to this meeting	Feb 2019
Corporate Strategy and Procedure Risk Register	Annually	Feb 17	Report to this meeting	Feb 2019
Corporate Risk Register (LCRS & Strategic Policies Risk Register)	Every 2/3 years	2015	Report to this meeting	2020/21
Council's Strategic Policies	Annually - Every 2 /3 years as required	Feb 14	Report to this meeting	Feb 2019/20
Council's Aims and Objectives	Annually - Every 2 /3 years as required	March 17	March 2020	
Complaints / Complements Review	Annually	March 2017	Report to this meeting	March 2019
Complaints Policy	Every 2 /3 years as required	March 2016	March 2019	
Electronic Communications	Quadrennially	June 2015	June 2019	

*** unless there is a change to key staff / as a result of legislative or regulatory change.**

Frequency of Meetings:

Tuesday 3rd July 2018, Tuesday 5th February 2019 and Tuesday 2nd July 2019.

LITTLEHAMPTON TOWN COUNCIL

Anti-Fraud & Corruption Policy

1. Introduction

- 1.1 Littlehampton Town Council has a responsibility for the provision of effective and efficient services to clients and stakeholders in a manner that seeks to ensure the best possible protection of the public purse in its delivery arrangements.
- 1.2 The Council is committed to operating an effective anti-fraud policy and strategy that complies with the best practice principles outlined in CIPFA's '[Red Book Code of Practice on Managing the Risk of Fraud and Corruption](#)' and the ALARM Standard 'Managing the Risk of Fraud'.
- 1.3 The Council recognises that failure to implement effective anti-fraud measures can undermine the standards of public service that the Council is attempting to achieve, reduce the level of resources and services available for the residents of Littlehampton and result in catastrophic consequences which reduce public confidence in the Council.

2. Definition

- 2.1 The Fraud Act 2006 provides a formal definition of fraud which, for the purposes of this policy, can be summarised as obtaining money, property or services dishonestly by making a false representation, failing to disclose information or abusing a position of trust.
- 2.2 Corruption is the "offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person".

3. Scope of the Policy

- 3.1 The policy covers any fraud or corrupt activity committed against the Town Council by employees, Members, contractors, suppliers, partners and other external organisations.

4. Policy Statement

- 4.1 The Council has a zero tolerance to all forms of fraud and corruption.
- 4.2 The Council expects high standards of conduct and probity from Members and employees and requires them at all times to act honestly, with integrity and to safeguard the public resources for which they are responsible.

- 4.3 The Council also expects that all individuals and organisations associated with the Council, such as contractors, partners, suppliers and users of council services, will act with integrity and have the same high standards of probity as the Council. The Town Council expects all its partners, in both the private and public sectors, to establish sound and transparent governance arrangements.
- 4.4 The Council will actively seek to deter and prevent fraud and corruption and ensure that the associated risks are identified and managed effectively. Where fraud or corruption is suspected or detected it will be investigated and any proven fraud dealt with in a consistent and proportionate manner. Appropriate sanctions and redress will be vigorously pursued against anyone perpetrating, or seeking to perpetrate fraud or corruption against the Council.
- 4.5 The Council is committed to ensuring the wide circulation of this policy in order that all relevant parties understand the very high standards which the Council is determined to observe in all its business.

5. Implementation

- 5.1 To ensure that this policy is implemented effectively the Council will:
- Identify and include fraud and corruption risks within its risk management framework;
 - Encourage a culture of prevention and deterrence;
 - Ensure that responsibilities are clearly defined and communicated at all levels;
 - Encourage everyone to be vigilant and report any genuine suspicions of fraudulent activity;
 - Develop and maintain cost effective controls to reduce the risk of fraud and corruption;
 - Ensure that sound financial standards are adopted and that financial systems incorporate good controls to reduce the risk of fraud;
 - Work with its partners to strengthen and continuously improve its arrangements to counter fraud and corruption;
 - Ensure that appropriate disciplinary and legal action is taken in all cases;
 - Comply with best practice.
- 5.2 Responsibility for the implementation of this policy lies primarily with the Council's Governance & Audit Committee.

LITTLEHAMPTON TOWN COUNCIL

Whistle Blowing Policy

1. Introduction

- 1.1 Employees are often the first to realise that there may be something seriously wrong within the Council. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Council. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.
- 1.2 The Council is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees, and others that we deal with, who have serious concerns about any aspect of the Council's work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.
- 1.3 The policy document makes it clear that you can do so without fear of victimisation, subsequent discrimination or disadvantage. This Whistle Blowing Policy is intended to encourage and enable employees to raise serious concerns **within** the Council rather than overlooking a problem or 'blowing the whistle' outside.
- 1.4 The Public Interest Disclosure Act 1998 protects employees who raise legitimate concerns about specified matters from being dismissed or from being subjected to detrimental treatment or victimised as a result, provided certain criteria are met.
- 1.5 The Act makes provision about the kinds of disclosure which may be protected and the circumstances in which disclosures are protected. These rules are therefore intended to comply with the Act by encouraging employees to make disclosures about fraud, corruption, misconduct or wrongdoing to the Council, without fear of reprisal, so that problems can be identified, dealt with and resolved quickly.
- 1.6 Employees are protected provided they reveal information of the right type, known as a "qualifying disclosure", and they reveal that information to the right person and in the right way, known as making a "protected disclosure".
- 1.7 The policy applies to all employees and those contractors working for the Council on Council premises, for example, agency staff, builders and drivers. It also covers suppliers and those providing services under a contract with the Council in their own premises.

- 1.8 These procedures are in addition to the Council's complaints procedures and other statutory reporting procedures. Managers are responsible for making service users aware of the existence of these procedures.

2. Aims and Scope of this Policy

- 2.1 This policy aims to:

- encourage staff to feel confident in raising serious concerns and to question and act upon concerns about practice
- provide avenues for staff to raise those concerns and receive feedback on any action taken
- ensure that staff receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied
- reassure staff that they will be protected from possible reprisals or victimisation if they have a reasonable belief that they have made any disclosure in good faith.

2.2 Qualifying Disclosures

Certain kinds of disclosure qualify for protection. These are disclosures of information which are made in good faith and which an employee reasonably believes tend to show one or more of the following relevant failures is either currently happening, took place in the past, or is likely to happen in the future:

- i) A criminal offence.
- ii) The breach of a legal obligation.
- iii) A miscarriage of justice.
- iv) A danger to the health and safety of any individual.
- v) Damage to the environment.
- vi) Deliberate concealment of information tending to show any of the above five matters.

- 2.3 Only disclosures of information that fall within one or more of these six categories qualify for protection under the Public Interest Disclosure Act 1998.

- 2.4 The Council also considers the following to be covered under this policy

- The unauthorised use of public funds
- Possible fraud and corruption
- Sexual or physical abuse
- Other unethical conduct

- 2.5 Thus, any serious concerns that staff have about any aspect of service provision or the conduct of Officers or Members of the Council or others acting on behalf of the Council can be reported under the Whistle Blowing Policy. This may be about something that:

- makes someone feel uncomfortable in terms of known standards, their experience or the standards they believe the Council subscribes to; or
- is against the Council's Standing Orders and Policies; or
- falls below established standards of practice; or

- amounts to improper conduct.

2.6 This policy does **not** replace the Council's Grievance Procedure.

2.7 The employee's belief must be reasonable, but it need not be correct. It might be discovered subsequently that they were, in fact, wrong or mistaken in their belief, but they must be able to show that they held the belief in good faith and that it was a reasonable belief to hold in the circumstances at the time of disclosure. Note that it is not the employee's responsibility to investigate the matter. That is the Council's responsibility.

3. **Protected disclosures**

3.1 For a qualifying disclosure to be a protected disclosure, you need to make it to the right person and in the right way. There are a number of methods by which you can make a protected disclosure, but the Council always encourages all employees to raise any disclosure internally in the first instance. Qualifying disclosures must be made in good faith to be protected, i.e. with honest intent and without malice or an ulterior motive.

3.2 You are protected if you make a qualifying disclosure to either:

- i) the Council, or
- ii) where you reasonably believe that the relevant failure relates solely or mainly to the conduct of a person other than the Council or any other matter for which a person other than the Council has legal responsibility, to that other person.

3.3 You are encouraged to raise any qualifying disclosures that you may have by following the disclosure procedure set out below.

3.4 If your concern relates to a breach of your own contract of employment, you should use the Council's grievance procedure.

3.5 An employee can choose whether to raise a concern about wrongdoing in the workplace as a grievance or separately as a protected disclosure.

4. **Safeguards**

4.1 **Harassment or Victimisation**

4.1.1 The Council is committed to good practice and high standards and wants to be supportive of employees.

4.1.2 The Council recognises that the decision to report a concern can be a difficult one to make. If what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer and those for whom you are providing a service.

4.1.3 The Council will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith.

4.1.4 Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that already affect you.

4.2 Confidentiality

4.2.1 All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness.

4.3 Anonymous Allegations

4.3.1 This policy encourages you to put your name to your allegation whenever possible.

4.3.2 Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Council.

4.3.3 In exercising this discretion the factors to be taken into account would include:

- the seriousness of the issues raised
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

4.4 Untrue Allegations

4.4.1 If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

5. The disclosure procedure

5.1 As a first step, you should raise concerns with your immediate Line Manager or if this is not appropriate the Town Clerk or ~~Finance & Resources Manager~~ the Deputy Town Clerk and Responsible Financial Officer. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.

5.2 Concerns may be raised verbally or in writing. Staff who wish to make a written report are invited to use the following format:

- the background and history of the concern (giving relevant dates);
- the reason why you are particularly concerned about the situation;
- ~~the earlier you express the concern the easier it is to take action.~~

5.3 The earlier you express the concern the easier it is to take action.

5.4 Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.

5.54 You may invite your trade union, professional association representative or a friend to be present during any meetings or interviews in connection with the concerns you have raised.

6. How the Council will respond

6.1 The Council will respond to your concerns. Do not forget that testing out your concerns is not the same as either accepting or rejecting them.

6.2 All disclosures will be treated seriously. The disclosure will be promptly investigated and, as part of the investigatory process, you will be interviewed and asked to provide a written witness statement setting out the nature and details of your disclosure and the basis for it. Confidentiality will be maintained during the investigatory process to the extent that this is practical and appropriate in the circumstances. However, in order to effectively investigate a disclosure, the Council must be able to determine the scope of the investigation and the individuals who should be informed of or interviewed about the disclosure. The Council reserves the right to arrange for another manager to conduct the investigation other than the manager with whom you raised the matter.

6.3 Once the investigation has been completed, you will be informed in writing of the outcome and the Council's conclusions and decision as soon as possible. The Council is committed to taking appropriate action with respect to all qualifying disclosures which are upheld.

6.4 You will not be penalised for raising a disclosure even if it is not upheld, unless the complaint was both untrue and made in bad faith.

6.5 Once the Council's conclusions have been finalised, any necessary action will be taken. This could include either reporting the matter to an appropriate external government department or regulatory agency and/or taking internal disciplinary action against relevant members of staff. If no action is to be taken, the reasons for this will be explained to you.

6.6 Where appropriate, the matters raised may:

- be investigated by management, the Internal Auditor, or through the disciplinary process
- be referred to the police
- be referred to the external auditor
- form the subject of an independent inquiry.

6.7 In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle which

the Council will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures (for example, child protection or discrimination issues) will normally be referred for consideration under those procedures.

- 6.8 Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.
- 6.9 Within ten working days of a concern being raised, the responsible person will write to you:
- acknowledging that the concern has been received
 - indicating how the Council propose to deal with the matter
 - giving an estimate of how long it will take to provide a final response
 - telling you whether any initial enquiries have been made
 - supplying you with information on staff support mechanisms
 - explaining whether further investigations will take place and if not, why not.
- 6.10 The amount of contact between the officers considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, the Council will seek further information from you.
- 6.11 Where any meeting is arranged, off-site if you so wish, you can be accompanied by a union or professional association representative or a friend.
- 6.12 The Council will take steps to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings the Council will arrange for you to receive advice about the procedure.
- 6.13 The Council accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform you of the outcome of any investigation.

7. The Responsible Officer

- 7.1 The Town Clerk has overall responsibility for the maintenance and operation of this policy and will maintain a record of concerns raised and the outcome (but in a form which does not endanger your confidentiality) and will report as necessary to the Council.

8 General principles

- 8.1
- i) Be aware of the importance of eliminating fraud or wrongdoing at work.
 - ii) Report anything that you become aware of that is illegal or unlawful.
 - iii) You will not be victimised, subjected to a detriment or dismissed for raising a protected disclosure under this procedure.