

WICKHAM MARKET PARISH COUNCIL:

FINANCIAL RISK ASSESSMENT



Risk assessment is a general and systematic examination of financial, people, environmental and community responsibility management factors. This table has been produced to ensure that our Parish Council has identified and assessed the risks it faces in each of these four areas and then satisfied itself that adequate steps have been taken to manage and minimise the key risks. In order to help prioritise risk management effort, the risks have been categorised into three levels: high (H), medium (M) and low (L).

Subject	Risk(s) Identified	Risk Level H/M/L	Eliminate, Reduce, Transfer, Share, Insure, Accept	Management of Risk Eliminate, Reduce, Transfer, Share, Insure, Accept	Staff/Member Action & Frequency
FINANCIAL RISKS					
Precept	1. Not submitted	L	R & A	Full PC Minutes – RFO to follow up if confirmation email or receipt is not forth coming from East Suffolk Council. If no form is submitted, the previous year’s precept requested will be rolled over	RFO to follow up and ascertain dates for payments.
	2. Not paid by District Council	L	A	Budget and precept prepared and agreed at full Council meeting. General Reserves held by Parish Council agreed to be in the region of 6 months’ worth of contracted expenditure. The RFO confirms receipt at the next full Council meeting.	RFO Confirms Receipt
	3. Adequacy of precept	L	R & A	<p>In the first instance, East Suffolk Council (ESC) advises the Parish Council (PC) of the Council Tax base rate, which is effectively the amount of money that every £1 of Council Tax raises from all property taxation for allocation to parish purposes in any one year though the PC.</p> <p>To determine the amount of precept required by the PC annually, the Clerk prepares an annual budget. To draft this budget, the Clerk evaluates past and current expenditure, future projects requiring investment or expenditure, current bank balances and debtors and creditors. The Clerk then determines from this data the amount of precept required from ESC. A full budget review is undertaken by the Finance & General Purpose Committee in December and the PC formally resolves the precept at its January Council Meeting. The Clerk, as the PC’s Responsible Finance Officer, then submits a formal, written request for the precept to ESC.</p> <p>The PC is advised every April of the annual precept figure which is then transferred by BACS payment in two parts into the PC’s current bank account. Confirmation of receipt is on the April and September bank reconciliations reported to the May and September full council meetings</p> <p>To mitigate this risk, the PC have set up a reserve of 50% of the precept to enable committed services to continue.</p>	<p>Continue to monitor</p> <p>After mitigation, risk is tolerable.</p>

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	4. Changed or reinforced precept requirements	L	A	If the Government or any of its agents were to change the rules under which precepts are set or calculated, we must assume this would require an act of Parliament or local government legislation which would afford the PC sufficient time to mitigate any change.		
Other Income	5. Income recorded	L	A	All income is recorded in the cashbook once received. Majority of income is in the form of direct transfer into the Council's accounts	RFO to action.	
	6. Reporting of income	L	A	Income received is reported at the next full Parish Council Meeting	Chair verify	
	7. From Allotments	L	A	An allotment register is maintained showing the cost of each plot and the tenancy details. All tenanted plots are billed in September each year. Most payments are made electronically. A full reconciliation between the allotment register and the bank account is made each December once payments have been received. A further reconciliation is made at 31 March to verify any tenancies that have been agreed after the bills were sent out.		
	8. From Markets	L	A	A register of regular and casual traders is kept. Casual traders for the bigger markets must pay by bank transfer ahead of the event. Regular traders are billed monthly and pay either directly to the bank or by cheque. Markets income is reported to the full council at bimonthly meetings.		
	9. From Cemetery	L	A	Burial Register updated daily for grave allocations. Check of burial register to invoices to undertakers. Check of memorial fees work dockets to invoicing.	Member to verify	
	10. Cash handling and banking	M	R & A	Cash handling is avoided, but where necessary – appropriate controls are in place. When received, cheques (and cash if applicable) are promptly banked via the Post Office cheque/cash receipt system. A card reader is used to minimise cash handling further. Total cash now handled is expected to be less than £200 per year. Receipts are checked to bank statements. Regular bank reconciliations	Annual review of documented controls Member to verify reconciliations taking place	
	11. Grants Received Claims procedure	L	A	Clerk/RFO to check applications, confirmation of acceptance, reporting to the full council meetings	Diary	
	12. Receipt of grant when due	L	A	Clerk/RFO to check confirmation of acceptance and receipt of funds, reporting to the full council meetings	Diary	
	Financial and general business	13. Overspending or failure to maintain adequate	M	A	The PC maintains a financial reserve equivalent to 50% of its current precept and that it will seek to protect these reserves through judicious management of expenditure and low-risk fund raising. Financial controls are in place to ensure expenditure does not exceed budget without appropriate authorisation. Financial Regulations 3.1 which is reviewed	Existing procedures are deemed adequate. After mitigation, risk is tolerable.

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	reserves			ahead of the monthly payment run authorisation. Adequacy of the precept is managed through bimonthly budget reviews	
Salaries or deductions incorrect	14. Wrong Salary Paid	L	A	A system of payslips has been implemented to verify (PAYE system in place). Council to verify salary scale and agreed pay-rate with reference to contract and salary scales provided by National Association of Local Councils. Payslips are provided to the payment authorisers before payment is made.	Chair to verify
	15. Wrong Hours Paid	L	A	All employees are on fixed hours contracts. Any additional hours require agreement from the full council which is minuted in the confidential minutes	Chair to verify
	16. PAYE administered wrongly	L	A	PAYE administered on HM Revenue & Customs agreed pay-codes using HMRC Basic PAYE tools software. A full reconciliation of HMRC payments is provide to the payment authorisers quarterly ahead of the HMRC payment being made	Tax Codes verified by HM Revenue & Customs
	17. Pensions administered wrongly	L	A	Pension rates deducted and paid in accordance with the details provided by NEST who operate the Pension Scheme. Monthly returns submitted to NEST. Payment made by direct debit.	Rates verified by NEST on an annual basis
Payments risks	18. Goods Supplied	L	A	System in place to check delivery /service. Full audit trail followed.	Approval check
	19. Invoice incorrectly calculated	L	A	Automatic check arithmetic at receipt of invoice by the cash book Check against orders raised – if applicable	Approval check
Payment Procedures	20. – Cheques	L	A	Two signatories required with cheque stubs and invoice both to be initialled. Payments are not normally made by cheque	
	21. Direct Debit 22. Standing Orders	L	A	Review of payments made under Direct Debit & Standing Order at Annual Meeting and noted at each meeting.	Members verify
	23. Credit Card	L	A	WMPC does not hold a credit card	
Electronic Payments	24. Incorrect payment or electronic amount made	L	A	All electronic payments are set up with the bank in accordance with the payment schedule signed by two bank signatories. A bank signatory then checks each payment back up (invoice, payslip etc) before approving the payment.	
	25. No monitor on	L	A	All payments are reported to bimonthly full council meetings together with the bank	

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	actual electronic payment			reconciliation.	
	26. Payments made without council approval	L	A	Most payments are made within the Chair and Clerk's delegated authority and the Chair approves the payment schedule before payments is made. Where a payment requires committee or full council approval, the authority is recorded against the payment details in the cash book and payments report.	
Election Costs	27. Invoice at agreed rate	L	A	RFO to check once invoice received. Reserve fund set up prior to an election year to cover costs of a Parish Poll. This risk is higher in an election year. There are few, predictable measures which could be adopted to minimise risk of having a series of contested elections. A reserve in the accounts should be budgeted for and maintained to cover unexpectedly high costs and red-ringed in the PC's reserve bank account.	Existing procedures are deemed adequate. After mitigation actions, the risk is tolerable.
Banking	28. Inadequate checks on receipts, payments and balances	L	A	The PC maintains two bank accounts. All payments are made using Electronic Payments or Direct Debits drawn on the Community Account and must be authorised by two signatories in line with the current mandate. Reserves are kept within the Business Rate Tracker account and may be transferred back to the Community Account to meet high levels of expenditure. Long Term Reserves are invested with CCLA at a higher return. The CCLA account required two signatures. The Clerk prepares bimonthly bank reconciliations for all accounts when the relevant statements are received to ensure all receipts, payments and transfers are properly recorded and any variations are reported immediately. All accounts are independently audited each year.	Existing procedures are deemed adequate. Clerk will review the bank mandate at each annual meeting or following any change to the membership of the PC. Risk is tolerable.
Financial controls	29. Inadequate processes or checks	L	A	Any financial obligation must be agreed and clearly minuted before any commitment is entered into as the precept is public money. All payments are be notified, approved and clearly minuted by members at regular PC meetings. All payments are fully and independently audited each year.	Existing procedures are deemed adequate. Risk is tolerable.
Financial Records	30. Knowledge of Statute	L	A	Council has appointed a qualified Clerk to manage the Council's financial affairs. Noted that the post-holder is also a qualified accountant	Diary
	31. Inadequate records	L	A	RFO/clerk check regularly and internal audit review The PC follows Financial Regulations and best practice laid out in the Governance and Accountability for Local Councils - a Practitioners' Guide (England) issued by the Joint Practitioners Advisory Group (JPAG). In addition to this, an internal control report is prepared by a councillor to ensure controls are actually being followed. Records are reviewed annually by an independent internal auditor. A copy of the financial	The financial regulations are reviewed annually to ensure they are adequate and are compatible with any changes proposed or required by statutory bodies.

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				regulations is published on the Council website.	Risk is tolerable.
	32. Changed financial regulation	L	A	Changes to requirements are published in the Annual Accountability for Local Councils - a Practitioners' Guide (England) issued by the Smaller Authorities' Proper Practices Panel (SAPPP). Such changes are managed by the RFO and audited by independent internal auditors	
	33. Loss of records	L	A	Office 365 for business is used with 1TB of cloud storage. Personal records kept securely within locked filing cabinet - not for public records.	RFO
	34. Access to bank records	L	A	Controls are set for access to the Council's bank accounts and ability to access records. Internet Banking controls in form of Internet Banking Policy covers the functioning of the operation of internet banking. RFO to create payment with two signatories to authorise.	RFO
	35. Internet Banking	L	A	Council operated accounts and access to online bank statements by the RFO. Internet access limited by passwords – renewed on an annual basis	RFO
	36. Transfer between accounts held by Council	L	A	The RFO manages the bank accounts through internal transfers to maximise interest	RFO & Member
VAT	37. Maintain records and claim refunds within set time limits	L	A	Under current HMRC legislation, the PC is able to reclaim all VAT paid on goods and services at the relevant rate. The Clerk calculates the VAT paid by analysing all invoices using the PC's accounting model and retains all VAT receipts with PC records for HMRC inspection. The Clerk makes VAT refund claims to HMRC annually in order to recover the tax paid and all claims against invoices are fully and independently audited each year.	Existing procedure are deemed adequate. Risk is tolerable.
	38. VAT analysis	M	A	VAT is reported separately on management reports	RFO verify
	39. Charged on purchases	L	A	VAT percentage is automatically checked by the cash book model	RFO verify
	40. Claimed within time limits	M	A	Agree returns submitted	RFO verify
Reserves - General	41. Adequacy	L	A	Analysis of General and Earmarked Reserves reviewed by Finance and General Purpose Committee with recommendations submitted to full Council. Budget prepared during November and December and approved by full Council in January. Budget process allows comparison's with previous, current and future years.	RFO opinion. 3 year plan
Reserves – Earmarked	42. Adequacy	L	A	Consider at Budget and review of final accounts WMPC have a series of earmarked reserves which are be assessed against the projects or risks they are intended to support or mitigate.	RFO opinion

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				Level of reserves to be considered at Budget setting by the finance and General Purpose Committee prior to year end.	
	43. Maintenance	L	A	Known reserves ring-fenced and referenced.	Member
	44. Movement	L	A	Movement between reserves – ring-fenced and general - into/from revenue budget to be by resolution of full Council.	Member
Investment	45. Loss of invested funds	L	A	Council to only invest in financial institutions that can demonstrate security and liquidity. Council will ensure that all investments are in accordance with its investment policy having regard to such guidance as the Secretary of State may issue. Council approval is required prior to investment.	
Annual return	46. Unidentified Earmarked or Contingent liability	L	A	Review minutes – none currently identified	RFO/member view
	47. Incomplete and/or not submitted within required time limits	L	A	The annual return is completed by the Clerk, approved and signed by the PC and then submitted to the Internal Auditor for completion and signature. Once checked and approved the annual return is sent onto the External Auditor within the required time limit. A diary of all the deadlines is kept by the Clerk and the Clerk reinforces these deadlines with both auditors.	Existing procedures are deemed adequate. Risk is tolerable.
CIL Reporting	48. CIL spend/income	L	A	Council to ensure understanding of the restrictions and time limits for receipt of income and expenditure.	Full Council following Officer verification RFO / Chair
	49. Annual CIL Report	L	A	CIL report to be submitted for the period under review. Annual Audit report of income and expenditure to be completed	
	50. Submission of Report	L	A	Annual Audit report to be submitted to District Council & publish on website.	RFO
	51. Review of timescales	L	A	Council to ensure that CIL monies received is allocated within 5 years of receipt	RFO / Council
	52. Earmark Reserves	L	A	Council to correctly identify unallocated CIL monies received in reserves	RFO / Council
Legal Powers	53. Illegal activity or payment	M	A	Educate Council as to their legal powers. WMPC currently hold the General Power of Competence	Diary
	54. PC affairs	L	A	The Clerk holds the CiLCA qualification and regularly reviews the correct processes for	

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	conducted illegally or improperly			the Council based on their own published processes	
Fraud	55. Fraudulent placement of contracts for services or supply of goods	L	I & A	It is the duty of every member of the PC and the Clerk to ensure that the highest standards of public service are attained and that everyone adheres to the strict rules and guidelines set on the procurement and purchase of services. It is also the duty of the PC to ensure it obtains the optimum value-for-money on behalf of its community in the purchase of goods and services from all its funds in the main through competitive and confidential tendering. The PC must also strive to optimise the revenues and surpluses derived from appropriate fund-raising activities. In addition, the requirements of the PC's Fidelity Guarantee Insurance must be adhered to and any breaches, whether suspected or real, must be openly reported without delay. Finally, all payments and expense claims are fully and independently audited each year	All members of the PC and the Clerk are kept fully informed of the rules of public financial governance. The Fidelity Guarantee and its accompanying insurance policy is reviewed annually and covers the precept plus year end reserves. After insuring, the risk is tolerable.
	56. False expense claims or unpermitted payments	L	A	The Clerk checks all expense claims and the payment authorisers also check before making payment	
Insurance	57. Inadequate cover	L	A	A review is undertaken at the time of the annual policy renewal to ensure that the terms of the policy remain acceptable and that all known risks and assets are adequately protected. Insurance cover is reviewed and approved annually in May.	Existing procedures are deemed adequate. Risk is tolerable.
	58. Cost	L	A	Further competitive quotes are obtained if deemed appropriate at renewal	
Assets	59. Loss or damage	L	I	An Asset Register is kept up to date and insurance is held at the appropriate level for all items. Regular checks are made on all assets by members of the Parish Council. Annual Inspection for all assets carried out. An external body contracted in for play area assessments. Council to confirm all assets have up-to-date insurance when compared against the asset register. Review adequacy of Public Liability Insurance	Review annually and inform Insurance Co if necessary. Annual Play Equipment inspections to be carried out.
	60. Risk/damage to third party individuals and their property	L	A	£10,000,000 Public Liability on Insurance Policy covered. Annual Inspections are carried out on all Play Equipment.	

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	61. Poor maintenance of assets	L	A	Independent Annual Inspection When reported, maintenance is carried out in accordance with the Council's Financial Regulations. Council has a revenue budget for asset maintenance as well as an earmarked reserve fund.	Members of Environment & Leisure Committee Members
Personnel RISKS					
Loss of staff members	62. Clerk	M	A	It should be noted that the Clerk has passed state retirement age. The Deputy Clerk does not aspire to become Clerk. To mitigate this, processes are recorded in as much detail as possible. The Staffing and Personnel Committee should consider succession planning.	
	63. Key Personnel	L	A	It is confirmed that the position of Proper Officer / Clerk/Responsible Financial Officer (RFO) is filled by one person.	RFO role to be confirmed on an annual basis through approval of the Standing Orders.
	64. Qualifications	L	A	Currently the role of the above is held by a CiLCA Qualified Clerk who is also a qualified accountant (FCCA)	Council to ensure role holders make use of continual professional development.
	65. Support Personnel	L	A	Council has in place a Deputy Clerk to assist with current administrative workload	Council has included within budget for training for both Clerk and Deputy Clerk
	66. Loss of Key Personnel	L	A	Hours, health, stress, long-term illness, etc – Council has implemented annual working reviews. Council to conduct an annual performance review in line with current contract.	Staffing & Personnel Committee to carry out annual reviews
	67. Work overload	L	A	Council to monitor workload to ensure that all projects undertaken are achievable within current resources.	Clerk/Council
GOVERNANCE RISKS					
Freedom of Information, Data Protection and Human Rights Acts	68. Absence of policies and lack of adherence preventing the community to free access of information	L	A	The PC has a model publication scheme in place and abides by the strict codes set by its Standing Orders to protect individual rights and privacy. The PC encourages all members and the Clerk to receive appropriate training and refresher courses to ensure that the highest standards of legal compliance and governance of personal data are achieved.	Monitor and report any contraventions or potential infringements of each of these important Acts of Parliament which protect individual rights and freedom.

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	69. Data Protection	L	A	Council has registered with the ICO as a Data Controller under the Data Protection Legislation. Renewal is on a Direct Debit Mandate.	
	70. General Data Protection Regulations	L	A	Council has carried out a Data Audit and identified the legal basis for processing personal data. Procedures are in place for dealing with Subject Access Requests; Data Breaches – detecting, reporting & investigating and obtaining consent. Privacy Notices updated and are available on the website and in the Parish Council Office. Mandatory where the processing of data poses a high risk to the rights and freedoms of individuals.	
	71. Data Protection Impact Assessments (DPIAs)	L	A	Council will carry out a DPIA when processing is likely to result in a high risk to the rights and freedoms of data subjects and will ensure if data is to be retained there are clear reasons for its retention and the manner in which such data will be destroyed.	
Governance	72. Standing Orders	L	A	Council has formally adopted tailored Standing Orders based on NALC model which are reviewed on an annual basis.	Clerk / Council
	73. Financial Regulations	L	A	Council has formally adopted tailored Financial Regulations based on the NALC model which are reviewed on an annual basis.	
Formal records of business and maintenance of statutory documents	74. Inaccurate or incomplete minutes	L	A	Summons and Agendas of meetings are produced and issued to all councillors within the correct time frame. The minutes of each meeting are then produced by the Clerk and issued in draft to the PC for its review in advance of the following meeting. The minutes are revised if required and approved at the next PC or Committee meeting and signed by the Chairman as a full and accurate record. Signed minutes are maintained by the Clerk and kept in PC records and approved minutes are uploaded onto the PC website for public referral. Agendas are displayed on the PC notice boards within the correct time frame.	Existing procedures are deemed adequate. Risk is tolerable.
Meeting location	75. Adequacy	L	A	The PC meetings are held at Wickham Market Village Hall which provides good meeting facilities for the whole council and opportunities for the community represented to engage in the meetings during each public session held. Meetings are advertised as much as possible in advance to ensure attendance	Existing procedures are deemed adequate.
	76. Health & safety	L	A	The PC considers the facilities are adequate for all who attend from a health & safety view, including the Annual Parish Meeting.	Risk is tolerable.
Members	77. Potential	L	A	This is a standard agenda item at all meetings and all members of the PC are required to	Existing procedures are

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interests	conflicts of interest			formally declare and register any Pecuniary or Non-Pecuniary interests they may have in respect of any matters under discussion at the outset of each meeting. A register of interests stated is continuously maintained and updated both with the Clerk and online.	deemed adequate and individual councillors are to continue to review and advise any changes to the Clerk.
	78. Code of Conduct	L	A	Council has adopted the Local Government Association Model Councillor Code of Conduct 2020	
Official records	79. Loss through theft/fire/damage	M	A	The PC official records and supporting documents are stored at the home of the Clerk or in the Parish office. Some official records are stored within the fireproof safe at the Parish Office. Some are also scanned if appropriate and held electronically	Existing procedures are deemed adequate. Action: Audit and effective maintenance of physical records should be carried out
Council's Records	80. Access to records held on computer	L	A	A paper copy of the access code for entry onto the laptop, which is operated by the Clerk for Council work, is kept in a sealed envelope by the Chair. Access to the envelope containing the access code to be opened in the absence of the Clerk must be by the Chair in the presence of another Councillor. Access to the laptop in these circumstances must be in the presence of two Councillors and a report submitted to the Council detailing the reasons for such access to be submitted at the next available meeting.	Chair & Member
Electronic records	81. Loss through theft/fire/damage or	L	A	The PC's electronic data and records are stored on the Clerk's PC which automatically backs up to a secure encrypted Microsoft 365 for business account. The Chair has a sealed envelope with a list of all required passwords.	Existing procedures are deemed adequate. Risk is tolerable.
	82. corruption/loss of computer data	L	A	It isn't just the records that are a risk here. The loss of IT capability should be assessed such as the total failure of the PC or network availability. As all records are backed up immediately to the cloud, these risks are minimal but should still be recorded. The risk of a computer virus corrupting records should also be explicit here. The mitigation is through training (don't click on uncertain links or open unknown emails!) and also through PC security. The Clerk's PC is regularly updated with all the security packages AVG offer. Computing risk is also increased if software updates are not implemented immediately	
COMMUNITY RESPONSIBILITY RISKS					
Community engagement	83. Inability to address the main concerns	M	A	The PC completed a Neighbourhood Plan. The PC is continually improving its efforts to communicate its own purpose and actions to the community through a Council business Plan, regular committee and topic reports published on the website, accessibility to	Existing procedures have recently been reinforced.

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	of the community and address strategic, long-term needs			councillors and staff at the PC office and at the larger markets. The PC also publish a regular news magazine which is distributed to all residents	
Extreme Weather conditions	84. Emergency Plan	M	A	The PC is currently developing an Emergency Plan in conjunction with East Suffolk Council	
Environment and aesthetics	85. Degradation of the local environment	L	A	The PC maintains an active role in planning matters. It also strives to conserve the ecology of the parish to the best of its abilities in conjunction with Government agencies and the NFP sector to maintain a sustainable and balanced community and environment.	Existing procedures are deemed adequate.
Personal Injury	86. Play area, village hall, allotments or other council owned areas	M	A	While these areas are mentioned in the risk assessment, it is important to understand that these risks are insurable. The council should demonstrate through records of regular checks that it was not negligent.	
Maintenance	87. Reduced value of assets or amenities -loss of income or performance	M	A	Annual maintenance inspection	Diary
Wickham Market Cemetery	88. To address risks	M	R, I & A	<ul style="list-style-type: none"> The Cemetery Group and the Environment Group have site meetings and raise issues of maintenance with the Council. Trees are inspected and the appropriate works are carried out accordingly. The contractors are East Suffolk Services, who have all the necessary qualifications to carry out the work. An assessment of the brick built shed (Bier House) was also carried out (this is padlocked for security) along with the seating within the cemetery. These are all to reduce risk of accident to visitors to the cemetery. Undertakers have been issued with safety guidelines and regulations to ensure the safety of visitors. Ground anchors for new memorials are now mandatory within the cemetery to protect visitors. Relatives are asked to remove breakable vases in view of safety concerns issued by the contractors. 	Existing procedures are deemed adequate. After mitigation actions, the risk is tolerable. Additional annual recording of tree safety by a professional would reduce this risk
Bus Shelter	89. To address risks	L	A	The condition of the bus shelter is monitored by the Clerk and other Councillors to protect	Existing procedures are

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& Street Furniture				users from injury as it is so visually prominent. Repairs are organised accordingly. Seating is also monitored by all members, again to protect users, reporting problems to the Clerk.	deemed adequate. Risk is tolerable.
Allotments	90. To address risks	L	A	Allotment tenants are reminded of their obligation with garden chemicals, tools etc. when their rent collection letters are issued each year. Each site has a Site Representative who reports problems to the Clerk, such as leaking taps, vandalism. Allotment plot holders have public liability insurance through the Allotment Association etc.	Existing procedures are deemed adequate. After mitigation actions, the risk is tolerable.
Skate Park & Basketball Court	91. To address risks	L	I & A	The Clerk and members of the Council inspect on a regular basis to detect visible faults. An Annual Inspection is carried out.	Existing procedures are deemed adequate.
Play Areas	92. To address risks	M	I & A	The village hall play area is a matter for the Parish Council. An Annual Inspection is carried out.	Appropriate inspections are carried out annually.
Market	93. General Risks	L	I & A	There is a separate Market Risk Assessment associated with the Temporary Event Notice for the event	
Village Hall	94. To address risks	M	I & A	Wickham Market Village Hall is owned by Wickham Market Parish Council but managed by Wickham Market Village Hall Management Committee (CIO)	Existing procedures are deemed adequate.