

TODMORDEN TOWN COUNCIL

Corporate Risk Register

Updated March 2026

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1. Purpose of this Register

This Corporate Risk Register sets out the principal strategic, operational, financial, legal, reputational and governance risks facing Todmorden Town Council.

The Register identifies:

- the nature and scope of each risk.
- the inherent (gross) level of risk before controls are applied.
- the existing controls and mitigation measures currently in place.
- the residual risk following those controls; and
- the target risk level the Council is seeking to achieve.

Each risk is assigned an owner and is assessed using agreed impact and likelihood scoring, enabling Members and officers to understand both the severity of risks and the effectiveness of existing controls.

The Corporate Risk Register is a live management document and is reviewed regularly by officers and reported to Members to support effective governance, informed decision-making, and compliance with good practice, including the Joint Panel on Accountability and Governance (JPAG) guidance.

2. Notable Changes to the Corporate Risk Register Since last review

Since the last review, the Corporate Risk Register has been significantly updated in both format and content.

The Register was previously presented as an Excel spreadsheet, which was difficult to read and interpret and required printing at A3 size for committee papers. The Register has now been reformatted into a narrative Word document to improve accessibility, readability and understanding, and to allow clearer explanation of risks, controls and risk tolerance. The underlying scoring methodology has been retained.

A review of the content has also been undertaken to ensure the Register accurately reflects the Council's current operating environment.

Risks previously relating specifically to Covid-19 have been reviewed and retired. The controls introduced during the pandemic (including remote working, digital access and governance continuity arrangements) are now embedded within business-as-usual operations and are reflected within existing risks, in particular Risks 12 (Stress / Long-Term Illness), 14 (Political Change), 18 (Operational Pressures and Staffing Capacity) and 23 (Business Continuity and Emergency Resilience).

The Register has been updated to reflect the Council's ownership and operation of new assets at Centre Vale Park, namely the Bandstand and Pavilion. Risks arising from these assets have been integrated across relevant operational, financial, governance and health and safety risks rather than treated in isolation. In addition, new risks have been introduced to address project handover and commissioning, facilities management, CCTV deployment, access control, **and** safeguarding, where appropriate.

These changes are intended to ensure that the Corporate Risk Register remains a live, relevant and proportionate management tool, supporting effective governance, informed decision-making and ongoing risk awareness.

3. Risk Register Assessment Matrix

a) How risks are scored

Each risk in this Register is assessed using two simple questions:

- Impact: If this risk occurred, how serious would the consequences be?
- Likelihood: How likely is it that this risk will occur?

Both impact and likelihood are scored on a scale of 1 to 5.

The two scores are then multiplied together to give an overall risk score.

$$\text{Risk score} = \text{Impact} \times \text{Likelihood}$$

This allows risks to be assessed consistently and compared in a transparent way.

Impact scores (how serious?)




Score	Meaning
1	Minimal impact – little disruption
2	Minor impact – short-term inconvenience
3	Moderate impact – noticeable disruption or cost
4	Major impact – significant disruption, financial or reputational damage
5	Severe impact – serious harm, major financial loss, legal or reputational consequences

Likelihood scores (how likely?)

Score	Meaning
1	Very unlikely
2	Unlikely
3	Possible
4	Likely
5	Very likely

b) What the risk scores mean

The resulting score places the risk into one of three broad categories:

Risk score	Category	Meaning
15–25	 High	Significant risk requiring active management
8–14	 Medium	Known and managed risk requiring monitoring
1–7	 Low	Acceptable risk managed through routine controls

It is normal and appropriate for a well-run Council to have a number of medium (amber) risks. A register showing only low risks would not be considered realistic.
























































































c) Inherent, Residual and Target risk

For each risk, three scores are shown:

- Inherent risk – the level of risk before controls are applied.
- Residual risk – the level of risk after existing controls
- Target risk – the level of risk the Council aims to achieve through further action, where appropriate

Not all risks can or should be reduced to “low”. Some risks are accepted at a medium level where further reduction would be disproportionate.

4. Summary of Corporate Risks & Risk Ratings - March 2026

No.	Category	Risk	Inherent Risk	Residual Risk	Target Risk
1	Legal	Public injured in buildings or on Council facilities	 9	 6	 4
2	Legal	Hazardous substances	 16	 8	 4
3	Financial	Vandalism	 12	 6	 4
4	Financial	Slump in sector / economy	 15	 9	 4
5	Financial	Lack of resources	 20	 6	 4
6	Financial	Theft / Misappropriation	 9	 6	 4
7	Reputational	Poor image / reputation	 12	 9	 3
8	Financial	Budget management	 16	 6	 4
9	Physical	Fire	 15	 12	 8
10	Contractual	Contractor failure	 15	 9	 6
11	Human Resources	Loss of key staff	 16	 12	 9
12	Human Resources	Stress / long-term illness	 16	 9	 6
13	Technological	IT failure	 12	 6	 6
14	Political	Political change	 9	 6	 3
15	Financial	Financial pressures	 20	 12	 9
16	Legal	Legislative change	 15	 9	 6
17	Financial	Fraud	 16	 6	 4
18	Human Resources	Operational pressures & staffing capacity	 25	 9	 6
19	Health & Safety	Events risk	 16	 9	 6
20	Legal / Reputational / Financial	Data protection & GDPR	 16	 12	 6
21	Legal / Reputational / Financial	Operational management of core & enabling functions	 20	 15	 8
22	Legal / Reputational / Financial	Financial risk management	 16	 12	 8
23	Legal / Reputational / Financial	Business continuity – loss of access to offices (flooding)	 16	 12	 9
24	Legal / Reputational / Financial	Sponsor role – Town Deal CV Park project handover	 15	 12	 6
25	Legal / Reputational / Financial	Ownership & ongoing availability of Wheels Park	 16	 12	 8
26	Legal / Reputational / Financial	Deployment and Use of CCTV at Bandstand and Pavilion	 16	 12	 6
27	Legal / Reputational / Financial	Facilities Management – Safe and Compliant Operation of Council Buildings	 16	 12	 6
28	Legal / Reputational / Financial	Safeguarding of Vulnerable People	 15	 10	 8
29	Legal / Reputational / Financial	Control of Access and Key Management for Council Facilities	 16	 12	 6

5. Risk Register

Risk 1: Public Injured in Buildings or on Council Facilities

Category:	Legal	Risk Owner:	Town Clerk
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Risk Description / Scope:

The public, staff or Councillors are injured as a result of activity or non-action of the Council, including the delivery of events and the use of Council buildings or facilities, including Lobb Mill, Patmos Gardens, Vale Land, the Pavilion, the Bandstand and Wheelspark.

Inherent/Fundamental Risk (E) (before controls)

Impact:	3	Likelihood:	3	Risk Score:	9
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How the Risk is Managed at Present (F)

TTC are tenants of the office and responsibility for statutory building checks falls to the Landlord (Calderdale MBC). Fire evacuation processes are in place. TTC conducts risk assessments and implements relevant Health & Safety policies for activities undertaken within the office. Council-owned land and buildings are regularly maintained, risk assessments are in place and reviewed regularly, site and building users are made aware of risks. Contractors are required to carry out their own risk assessments before carrying out work on site.

Residual/Remaining Risk (G)

Impact:	3	Likelihood:	2	Risk Score:	6
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
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Why have you drawn this conclusion?	Claims records and a Grounds Maintenance contract provide assurance that sites are maintained to an appropriate standard. Service users report damage or hazards, enabling timely remedial action to be taken. Formal inspections will be introduced (quarterly) to strengthen existing arrangements.
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What Controls are to be Implemented (K)

Inclusion of all inspections within a database to ensure checks are carried out when due.

Date for Completion (L):	Delayed, but quarterly checks to commence July 2026
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Target Risk (M)

Impact:	2	Likelihood:	2	Risk Score:	4
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Risk 2: Hazardous Substances

Category: Legal

Risk Owner: Town Clerk

Risk Description / Scope:

Exposure of staff, contractors, volunteers or members of the public to hazardous substances through the use, storage or handling of cleaning products, grounds maintenance materials or other substances used in Council premises or facilities. This includes the Council office (where the Council is a tenant) and Council-managed facilities, including the Pavilion at Centre Vale Park.

Inherent/Fundamental Risk (E) (before controls)

Impact:	4	Likelihood:	4	Risk Score:	16
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How the Risk is Managed at Present (F)

Todmorden Town Council is a tenant. Statutory COSHH responsibilities for the building sit with the Landlord (Calderdale MBC), and COSHH assessments for the premises are therefore undertaken by CMBC. TTC ensures staff awareness of hazardous substances and safe working practices through induction, risk assessments and compliance with Health and Safety policies. For Council-managed facilities (e.g. the Pavilion), TTC controls the procurement, storage and use of cleaning products. All products are supplied with appropriate COSHH safety data sheets and are stored in a locked cupboard with controlled access. Products are selected to minimise risk wherever possible. Grounds maintenance activities involving sprays or chemicals are outsourced to competent contractors, who retain responsibility for COSHH compliance for their activities.

Residual/Remaining Risk (G)

Impact:	4	Likelihood:	2	Risk Score:	8
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
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Why have you drawn this conclusion?	COSHH responsibilities are clearly defined between the landlord and TTC. TTC-controlled substances are limited, appropriately assessed, supported by COSHH data sheets and securely stored, with staff awareness and competent contractors further reducing exposure risk.
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What Controls are to be Implemented (K)

Maintain record of COSHH data sheets for TTC-procured cleaning products. Periodic review of substances. Refresh staff awareness as part of H&S reviews.

Date for Completion (L):	ongoing
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Target Risk (M)

Impact:	4	Likelihood:	1	Risk Score:	4
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Risk 3: Vandalism

Category: Financial

Risk Owner: Town Clerk

Risk Description / Scope:

Vandalism & Graffiti affecting Council Assets / Buildings.

Inherent/Fundamental Risk (E) (before controls)

Impact:	3	Likelihood:	4	Risk Score:	12
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How the Risk is Managed at Present (F)

External grounds maintenance contractor to bring any issues to our attention.

Residual/Remaining Risk (G)

Impact:	2	Likelihood:	3	Risk Score:	6
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
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Why have you drawn this conclusion?	The social causes of vandalism are such that this cannot be controlled wholly within the Council. No recent history of vandalism to our specific sites.
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What Controls are to be Implemented (K)

Reporting of damage via service users ensures remedial action taken.

Date for Completion (L):	ongoing
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Target Risk (M)

Impact:	2	Likelihood:	2	Risk Score:	4
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Risk 4: Slump in sector/economy

Category:	Financial	Risk Owner:	Town Clerk
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Risk Description / Scope:			
Recession. Income decline. Lack of growth.			
Inherent/Fundamental Risk (E) (before controls)			
Impact:	5	Likelihood:	3
Risk Score:			15

How the Risk is Managed at Present (F)			
The Council manages this risk through prudent financial planning, efficiency savings, service prioritisation and the maintenance of adequate financial reserves. TTC has low reliance on earned income, with the precept remaining the primary funding source. The Bandstand and Pavilion are nearing completion and will provide opportunities for limited income generation through public hire, contributing to income diversification once operational.			
Residual/Remaining Risk (G)			
Impact:	3	Likelihood:	3
Risk Score:			9

Tolerance Level of Risk (H)	
Level of Risk Acceptable? (Y/N)	Yes
Why have you drawn this conclusion?	The level of risk is considered acceptable. TTC has low reliance on earned income, with the precept remaining the primary funding source. The completion of the Bandstand and Pavilion will provide opportunities for limited income generation through public hire, which may contribute to income diversification. Income from these sources is expected to be modest and uncertain and is not relied upon for core service delivery.

What Controls are to be Implemented (K)			
Implement hire arrangements for the Bandstand and Pavilion and monitor usage and income to inform service planning and assess their contribution to income diversification.			
Date for Completion (L):	ongoing		
Target Risk (M)			
Impact:	2	Likelihood:	2
Risk Score:			4

Risk 5: Lack of Resources

Category:	Financial	Risk Owner:	Town Clerk
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Risk Description / Scope:

Insufficient staff capacity, office accommodation, equipment or financial resources to deliver the Council's statutory duties and agreed priorities effectively.

Inherent/Fundamental Risk (E) (before controls)

Impact:	5	Likelihood:	4	Risk Score:	20
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How the Risk is Managed at Present (F)

The Council manages this risk through prioritisation and a clear focus on key areas of service delivery. Efficiency savings, service planning and effective leadership and management are used to align resources with agreed priorities. Recruitment procedures and, where necessary, staff restructuring are used to respond to changes in workload. The Council also maintains increased levels of financial reserves to provide resilience.

Residual/Remaining Risk (G)

Impact:	3	Likelihood:	2	Risk Score:	6
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
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Why have you drawn this conclusion?	The build-up of financial reserves provides a buffer to meet contingency costs should resource pressures increase. Ongoing service planning and prioritisation enable the Council to manage within available resources.
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What Controls are to be Implemented (K)

Workload and service delivery will continue to be monitored to identify emerging capacity pressures. Where appropriate, this will inform decisions on the externalisation of services or other resource adjustments.

Date for Completion (L):	Ongoing
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Target Risk (M)

Impact:	2	Likelihood:	2	Risk Score:	4
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Risk 6: Theft/Misappropriation

Category: Financial

Risk Owner: Town Clerk

Risk Description / Scope:

Burglary, theft or misappropriation of Council assets, cash, equipment or records, including risks arising from Council offices, staff activity and Council-managed facilities, including the Bandstand and Pavilion.

Inherent/Fundamental Risk (E) (before controls)

Impact:	3	Likelihood:	3	Risk Score:	9
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How the Risk is Managed at Present (F)

The Council manages this risk through a combination of physical security measures and robust financial controls. These include CCTV coverage, security lighting, secure entry systems, intruder alarms, and secure lockable storage. Council-managed facilities, including the Bandstand and Pavilion, are covered by CCTV monitored by an external contrac. Insurance arrangements are in place, including fidelity insurance. An inventory of assets is maintained. Staff training and awareness, together with strong financial and internal controls, reduce the risk of misappropriation or fraud.

Residual/Remaining Risk (G)

Impact:	2	Likelihood:	3	Risk Score:	6
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N) Yes

Why have you drawn this conclusion? The Council offices are located within the Town Hall in a prominent location and are fully alarmed. Robust internal financial controls are in place, supported by external accountant oversight of any financial irregularity. Fidelity Insurance cover of £2,000,000 is in place. Council-managed facilities (e.g. Bandstand, Pavilion) will be subject to appropriate physical security measures, including CCTV monitoring.

What Controls are to be Implemented (K)

Operational responsibilities and security arrangements will be reviewed following any change in service delivery, the commissioning of new facilities, or in response to any incident, to ensure controls remain proportionate and effective.

Date for Completion (L): Ongoing

Target Risk (M)

Impact:	2	Likelihood:	2	Risk Score:	4
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Risk 7: Poor Image/Reputation

Category:	Customer	Risk Owner:	Town Clerk
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Risk Description / Scope:

Loss of reputation resulting in a decline in the profile of Council services, poor public perception, reduced confidence in decision-making, or reputational damage arising from poor service delivery or damage to Council-owned land and assets.

Inherent/Fundamental Risk (E) (before controls)

Impact:	4	Likelihood:	3	Risk Score:	12
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How the Risk is Managed at Present (F)

The Council manages this risk through effective leadership, clear governance arrangements and regular communication between the Town Clerk and Members. Service delivery is monitored to ensure agreed standards are maintained, and issues are addressed promptly when identified. The Council maintains open dialogue with stakeholders and the community, supported by clear decision-making, transparency and appropriate use of communications channels. Council assets and facilities are actively managed to protect their condition and public perception, with operational responsibilities reviewed as services evolve.

Residual/Remaining Risk (G)

Impact:	3	Likelihood:	3	Risk Score:	9
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
Why have you drawn this conclusion?	The Council operates as a small organisation with close Member and officer engagement, enabling timely identification and resolution of issues. Regular dialogue between the Town Clerk and Members supports consistent messaging, proportionate decision-making and effective oversight of service delivery.

What Controls are to be Implemented (K)

Operational responsibilities and service delivery arrangements will be reviewed following any significant change in service delivery, incident or public concern, to ensure reputational risks are identified early and managed appropriately.

Date for Completion (L):	Ongoing
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Target Risk (M)

Impact:	3	Likelihood:	1	Risk Score:	3
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Risk 8: Budget Management

Category:	Financial	Risk Owner:	Town Clerk
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Risk Description / Scope:

Insufficient financial resources or ineffective financial management leading to an inability to deliver agreed services, including risks arising from poor financial records, inadequate controls over expenditure or commitments, and weak financial oversight.

Inherent/Fundamental Risk (E) (before controls)

Impact:	4	Likelihood:	4	Risk Score:	16
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How the Risk is Managed at Present (F)

The Council manages this risk through regular financial monitoring and strong governance arrangements. Monthly budget monitoring reports are produced, showing expenditure and commitments against approved budgets. The Rialtas financial management system is used to control budgets and record financial transactions. A Scheme of Delegation is in place to define financial authority and decision-making responsibilities. Robust year-end procedures are followed, supported by an external accountant to ensure accurate financial close-down and compliance with statutory requirements.

Residual/Remaining Risk (G)

Impact:	3	Likelihood:	2	Risk Score:	6
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
Why have you drawn this conclusion?	Regular budget monitoring is reported to Full Council, supported by schedules of payments and ongoing financial oversight. The outcomes of both internal and external audit provide independent assurance that financial controls are operating effectively.

What Controls are to be Implemented (K)

Cashflow and reserves will be reconciled monthly to provide Members with a clear understanding of the Council's ongoing financial position and capacity. A Reserves Policy is in place including the creation and use of Earmarked Reserves, to strengthen financial planning and improve visibility of emerging financial pressures. An annual review of financial effectiveness will be undertaken and reported to Full Council, with outcomes formally minuted.

Date for Completion (L):	Ongoing
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Target Risk (M)

Impact:	2	Likelihood:	2	Risk Score:	4
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Risk 9: Fire**Category:** Physical**Risk Owner:** Town Clerk**Risk Description / Scope:**

Outbreak of fire resulting in injury or loss of life, damage to buildings or assets, disruption to Council operations or services, and associated legal, financial or reputational consequences. This includes the Council office accommodation and, once operational control transfers, Council-managed buildings and facilities.

Inherent/Fundamental Risk (E) (before controls)

Impact:	5	Likelihood:	3	Risk Score:	15
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How the Risk is Managed at Present (F)

The Council office is located within the Town Hall. As landlord, Calderdale MBC is responsible for statutory fire safety compliance, including electrical safety checks and the completion of the Fire Risk Assessment (FRA). Within the Council office, appropriate fire safety arrangements are in place, including smoke alarms, fire-fighting equipment, nominated fire wardens, fire drills and a smoke-free policy.

Residual/Remaining Risk (G)

Impact:	4	Likelihood:	3	Risk Score:	12
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
Why have you drawn this conclusion?	Fire safety arrangements for the Council office are supported by landlord-managed Fire Risk Assessments, established fire safety procedures and insurance cover. These arrangements provide appropriate assurance while the Council operates solely from landlord-managed premises.

What Controls are to be Implemented (K)

Once operational control transfers, building-specific fire safety arrangements will be established for Council-managed buildings and facilities, including the Bandstand and Pavilion, as appropriate to their use. This will include completion and review of Fire Risk Assessments, installation and maintenance of fire safety equipment, staff awareness and procedures, and ongoing review following any change in use or occupancy.

Date for Completion (L): Ongoing**Target Risk (M)**

Impact:	4	Likelihood:	2	Risk Score:	8
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Risk 10: Contractor Failure

Category: Contractual **Risk Owner:** Town Clerk

Risk Description / Scope:

Failure of contractors to deliver works or services to the required standard or timescale, resulting in unfinished works, delays to delivery, disruption to services, or additional cost to the Council.

Inherent/Fundamental Risk (E) (before controls)

Impact:	3	Likelihood:	5	Risk Score:	15
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How the Risk is Managed at Present (F)

The Council manages this risk through robust procurement, contractor selection and contract management arrangements. Contractors are appointed following appropriate due diligence to assess competence, capacity and experience, with clear specifications, timescales and performance requirements set out within contracts. Performance is monitored to ensure delivery and to identify and address any issues at an early stage.

Residual/Remaining Risk (G)

Impact:	3	Likelihood:	3	Risk Score:	9
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N) Yes

Why have you drawn this conclusion? The Council's procurement and contract management arrangements provide assurance that contractors are appropriately assessed, appointed and monitored. These controls reduce the likelihood and impact of contractor failure to an acceptable level.

What Controls are to be Implemented (K)

Where new or additional contractors are appointed, appropriate pre-contract checks will be undertaken, including Constructionline and/or CHAS accreditation where applicable. Contractor performance will continue to be monitored throughout the contract period.

Date for Completion (L): Ongoing

Target Risk (M)

Impact:	3	Likelihood:	2	Risk Score:	6
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Risk 11: Loss of Key Staff**Category:** Human Resources**Risk Owner:** Town Clerk**Risk Description / Scope:**

Loss of key or skilled staff through resignation, retirement or long-term absence, resulting in a loss of organisational knowledge, reduced capacity or disruption to service delivery.

Inherent/Fundamental Risk (E) (before controls)

Impact:	4	Likelihood:	4	Risk Score:	16
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How the Risk is Managed at Present (F)

The Council manages this risk through on-the-job shadowing, staff appraisal and training to support skills development and knowledge sharing. Opportunities are provided for staff to broaden their experience, reducing reliance on single individuals for critical functions.

Residual/Remaining Risk (G)

Impact:	3	Likelihood:	4	Risk Score:	12
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
Why have you drawn this conclusion?	The current workforce profile does not indicate an immediate risk of retirement-related turnover. Existing arrangements for training, appraisal and knowledge sharing help to mitigate the impact of any staff changes.

What Controls are to be Implemented (K)

Workloads and delivery of outputs will be monitored to identify capacity or resilience issues. Continued mentoring and skills development will be used to strengthen succession planning and reduce reliance on key individuals.

Date for Completion (L): Ongoing**Target Risk (M)**

Impact:	3	Likelihood:	3	Risk Score:	9
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Risk 12: Stress/Long Term Illness

Category: Human Resources

Risk Owner: Town Clerk

Risk Description / Scope:

Stress or long-term illness arising from excessive workloads, tight deadlines, unreasonable expectations, or a lack of awareness of staffing resource implications when additional demands are placed on staff, leading to reduced capacity or disruption to service delivery.

Inherent/Fundamental Risk (E) (before controls)

Impact:	4	Likelihood:	4	Risk Score:	16
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How the Risk is Managed at Present (F)

The Council manages this risk through active workload management and staff support arrangements. This includes monitoring absence, prioritising work programmes, effective delegation and workload distribution, and the use of stress risk assessments where appropriate. Supportive measures are in place, including access to stress counselling and therapeutic return-to-work arrangements following periods of absence. Line management arrangements allow flexibility to respond to emerging pressures within a small team environment.

Residual/Remaining Risk (G)

Impact:	3	Likelihood:	3	Risk Score:	9
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
Why have you drawn this conclusion?	The Council operates with sufficient flexibility to adjust workloads and priorities as required. Current sickness levels are low, and existing monitoring and support arrangements, including regular staff well-being meetings, provide appropriate assurance that stress-related risks are identified and managed.

What Controls are to be Implemented (K)

Attendance and wellbeing will continue to be monitored to identify emerging trends or concerns, enabling timely intervention and adjustment of workloads where necessary.

Date for Completion (L): Ongoing

Target Risk (M)

Impact:	3	Likelihood:	2	Risk Score:	6
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Risk 13: IT Failure

Category: Technological

Risk Owner: Town Clerk

Risk Description / Scope:

Failure or disruption of IT systems, including infrastructure, communications, email, website and content management, financial systems, asset registers and desktop applications, resulting in loss of data, reduced operational effectiveness or interruption to Council business.

Inherent/Fundamental Risk (E) (before controls)

Impact:	4	Likelihood:	3	Risk Score:	12
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How the Risk is Managed at Present (F)

The Council manages this risk through the use of specialist external IT providers. Core IT systems are provided and supported by Cloudy IT, who specialise in IT services for parish and town councils. Systems are delivered through a Microsoft Office 365 environment, supporting secure access to email, documents and applications. The Council operates from the Town Hall and has its own dedicated broadband connection, separate from the building owner's infrastructure, improving resilience and reliability of connectivity.

Residual/Remaining Risk (G)

Impact:	3	Likelihood:	2	Risk Score:	6
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N) Yes

Why have you drawn this conclusion? IT systems are professionally managed and supported, with incidents infrequent and generally limited in impact. Dedicated broadband connectivity and specialist external support provide appropriate assurance that IT risks are managed and operational disruption can be minimised.

What Controls are to be Implemented (K)

Ongoing review of IT arrangements and system performance will be undertaken with the Council's IT provider to ensure continued resilience, security and suitability as operational requirements evolve.

Date for Completion (L): Ongoing

Target Risk (M)

Impact:	3	Likelihood:	2	Risk Score:	6
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Risk 14: Political Change

Category: Political **Risk Owner:** Town Clerk

Risk Description / Scope:

Political change resulting in shifts to policy direction, priorities or funding arrangements that impact on the Council's services, work programme or resource allocation.

Inherent/Fundamental Risk (E) (before controls)

Impact:	3	Likelihood:	3	Risk Score:	9
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How the Risk is Managed at Present (F)

The Council manages this risk through ongoing monitoring and service planning, ensuring that activities and resources are aligned with the priorities set by Members. Officer advice supports Members in understanding the operational and resource implications of policy decisions, enabling timely adjustment of delivery where required.

Residual/Remaining Risk (G)

Impact:	3	Likelihood:	2	Risk Score:	6
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
Why have you drawn this conclusion?	At Town Council level, the scope of services and statutory responsibilities is limited, reducing exposure to wider policy or funding changes. Close working between Members and officers enables priorities to be reviewed and realigned without significant disruption to service delivery.

What Controls are to be Implemented (K)

Workloads and delivery of outputs will continue to be monitored to ensure alignment with changing Member priorities. Where appropriate, consideration will be given to joint working or collaboration with other authorities if political direction supports such an approach.

Date for Completion (L): Ongoing

Target Risk (M)

Impact:	3	Likelihood:	1	Risk Score:	3
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Risk 15: Financial Pressures

Category:	Financial	Risk Owner:	Town Clerk
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Risk Description / Scope:

Financial pressures arising from reliance on precept income, inflationary cost increases (including energy and rates), the withdrawal of external grant funding, and uncertainty around the net financial impact of Council-owned assets, potentially affecting the Council's ability to sustain service delivery and maintain financial resilience.

Inherent/Fundamental Risk (E) (before controls)

Impact:	5	Likelihood:	4	Risk Score:	20
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How the Risk is Managed at Present (F)

The Council manages this risk through regular budget monitoring, prudent financial planning and the maintenance of appropriate reserves. The withdrawal of grant funding from Calderdale MBC has been addressed through the creation of a specific earmarked reserve, established to manage the transition to a fully precept-funded position. This earmarked reserve is being applied in a planned and time-limited way to smooth budget pressures and moderate precept increases while longer-term costs are absorbed into the base budget. The Council's primary source of income is the precept, providing a stable funding base. Grants awarded by the Council remain discretionary, allowing flexibility should financial pressures increase.

Residual/Remaining Risk (G)

Impact:	4	Likelihood:	3	Risk Score:	12
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
Why have you drawn this conclusion?	The Council retains the ability to raise precept to respond to increasing costs and has discretion over non-statutory service delivery. The planned use of earmarked reserves provides short-to medium-term resilience while longer-term financial pressures are addressed through budget setting and service planning.

What Controls are to be Implemented (K)

Continue planned monitoring and review of the earmarked reserve established to manage the withdrawal of CMBC grant support, recognising its time-limited nature. Closely monitor the financial impact of the Pavilion and Bandstand once operational, including both income from hire and actual running costs, to inform future budgets and medium-term financial planning. Maintain a value-for-money approach across all areas of expenditure, with ongoing review of discretionary spending and service commitments.

Date for Completion (L):	Ongoing
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Target Risk (M)

Impact:	4	Likelihood:	3	Risk Score:	9
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Risk 16: Legislative Change

Category:	Legal	Risk Owner:	Town Clerk
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Risk Description / Scope:

Failure to identify, understand or respond appropriately to changes in legislation or regulatory requirements, resulting in adverse impacts on service delivery, compliance or costs. This includes changes relating to local government finance, rating, energy performance requirements (EPCs/DECs), employment and governance.

Inherent/Fundamental Risk (E) (before controls)

Impact:	5	Likelihood:	3	Risk Score:	15
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How the Risk is Managed at Present (F)

The Council manages this risk through active engagement with professional networks and sector bodies, including local authority associations. Legislative developments are monitored and considered through service planning, supported by impact analysis and engagement in relevant consultations where appropriate. Officer advice is used to inform Members of legislative changes and their implications, enabling timely adjustment of policies, procedures or service delivery.

Residual/Remaining Risk (G)

Impact:	3	Likelihood:	3	Risk Score:	9
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
Why have you drawn this conclusion?	Legislative change is typically subject to consultation and transitional arrangements, providing sufficient lead-in time to assess impacts and adjust service requirements. Ongoing monitoring through professional bodies and networks provides early awareness and reduces the likelihood of non-compliance.

What Controls are to be Implemented (K)

Ongoing monitoring of legislative and regulatory developments will continue through professional bodies, networks and sector guidance, with impacts reviewed and incorporated into service planning as required.

Date for Completion (L):	Ongoing
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Target Risk (M)

Impact:	3	Likelihood:	2	Risk Score:	6
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Risk 17: Fraud**Category:** Financial**Risk Owner:** Town Clerk**Risk Description / Scope:**

Fraud or financial irregularity arising from external parties submitting false claims or invoices, or from internal abuse, resulting in financial loss, reputational damage or governance failure.

Inherent/Fundamental Risk (E) (before controls)

Impact:	4	Likelihood:	4	Risk Score:	16
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How the Risk is Managed at Present (F)

The Council manages this risk through robust financial controls and verification processes. These include due diligence checks, references, management oversight, separation of duties, regular reconciliations, and the requirement for original supporting evidence for all transactions. A gift and hospitality register is maintained to support transparency and ethical conduct. Financial activity is subject to ongoing monitoring, with invoices verified against work carried out and payments made in accordance with agreed procedures.

Residual/Remaining Risk (G)

Impact:	3	Likelihood:	2	Risk Score:	6
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
Why have you drawn this conclusion?	Strong internal controls, close monitoring of financial activity and independent scrutiny provide appropriate assurance. A previous incident of unauthorised access was identified and resolved promptly due to effective monitoring arrangements, demonstrating the effectiveness of existing controls.

What Controls are to be Implemented (K)

Half-yearly internal audit and regular bank reconciliations will continue to be undertaken. Insurance cover is in place and kept under review. Online banking security arrangements will continue to be strengthened in line with best practice.

Date for Completion (L): Ongoing**Target Risk (M)**

Impact:	2	Likelihood:	2	Risk Score:	4
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Risk 18: Operational pressures and risk of insufficient staffing available to complete commitments.

Category:	Human Resources	Risk Owner:	Town Clerk
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Risk Description / Scope:

Operational pressures arising from service commitments or asset ownership being undertaken without sufficient staffing capacity or defined response arrangements. This includes the ability to respond appropriately to incidents occurring outside normal working hours at Council-managed buildings and facilities, potentially impacting service delivery, asset protection, staff wellbeing or organisational resilience.

Inherent/Fundamental Risk (E) (before controls)

Impact:	5	Likelihood:	5	Risk Score:	25
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How the Risk is Managed at Present (F)

The Council manages this risk through due diligence prior to committing to new services or responsibilities, ensuring that staffing, capacity and operational implications are understood. Management checks and officer advice support Members in assessing the resource requirements of proposals before decisions are made.

For Council-managed buildings, security monitoring and first response to intruder alarm and fire alarm will be provided by an external contractor as key holders, who attend, secure the building and report incidents. However, follow-on actions (such as arranging repairs or contractor attendance) will require officer involvement.

Workloads are managed within existing policies, with additional time addressed through Time Off in Lieu (TOIL) or adjustments to priorities. There are currently no contractual on-call or out-of-hours response arrangements in place for staff.

Residual/Remaining Risk (G)

Impact:	3	Likelihood:	3	Risk Score:	9
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
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Why have you drawn this conclusion?	Members recognise the need to consider staffing capacity and operational resilience when taking on additional assets or responsibilities. While immediate security response is in place through external key-holding arrangements, the absence of defined out-of-hours response arrangements presents a manageable but recognised risk requiring further action.
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What Controls are to be Implemented (K)

- Develop and agree appropriate out-of-hours incident response arrangements for Council-managed buildings, proportionate to risk and usage.
- Consider options including external call-out services, managed contractor response, or revised service arrangements, rather than reliance on informal officer availability.

- Ensure any arrangements are clear, documented and consistent with employment policies and staff wellbeing.
- Review arrangements once the Bandstand and Pavilion are operational and incident patterns are understood.

Date for Completion (L): Ongoing / prior to full operational handover where practicable

Target Risk (M)

Impact:	3	Likelihood:	2	Risk Score:	6
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Risk 19: Events Risk

Category: Health & Safety

Risk Owner: Town Clerk

Risk Description / Scope:

Risks arising from the planning, management or facilitation of events, including risks to public safety, reputational damage, legal liability or non-compliance with licensing and health and safety requirements. This includes Council-delivered events and events held at Council-managed facilities where the Council retains responsibility for permissions, oversight or compliance arrangements.

Inherent/Fundamental Risk (E) (before controls)

Impact:

4

Likelihood:

4

Risk Score:

16

How the Risk is Managed at Present (F)

The Council currently delivers a limited number of events directly, principally the annual Christmas Lights event. These events are managed in accordance with recognised guidance, including the Event Safety Purple Guide, insurer requirements, and the use of event management and safety plans. The Council has in-house capability to support event safety, including an SIA-licensed Door Supervisor. The Town Clerk is also a Personal Licence Holder and has agreed to support the Council in securing a Premises Licence for the Bandstand to enable its lawful operation. The Bandstand is located within Centre Vale Park, which is owned by Calderdale MBC.

The Council is aware of the proposed requirements arising from Martyn's Law and will continue to monitor developments in the legislation. Appropriate staff awareness and training will be undertaken in line with the scale and nature of events facilitated by the Council.

The Council works with partner organisations and volunteers to support safe event delivery, while retaining appropriate oversight where events are facilitated through Council-managed facilities.

Residual/Remaining Risk (G)

Impact:

3

Likelihood:

3

Risk Score:

9

Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)

Yes

Why have you drawn this conclusion?

The Council limits direct event delivery and applies recognised safety and licensing frameworks to events it delivers or facilitates. Clear roles, use of established guidance, and appropriate professional oversight provide assurance that event-related risks can be managed proportionately.

What Controls are to be Implemented (K)

- Establish and document clear arrangements for events held at the Bandstand, distinguishing between Council-led events and third-party or community-led events.
- Ensure appropriate licensing, permissions and conditions are in place for the operation of the Bandstand, including liaison with Calderdale MBC as landowner where required.
- Put in place clear expectations for event organisers and volunteers, including responsibilities for safety management, stewarding and compliance with agreed conditions.
- Review event management arrangements once the Bandstand is operational to ensure controls remain proportionate and effective.

Date for Completion (L):	Prior to and following commencement of Bandstand operations, then ongoing				
Target Risk (M)					
Impact:	3	Likelihood:	2	Risk Score:	6

Risk 20: Data Protection & GDPR

Category:	Legal/Reputational/Financial	Risk Owner:	Town Clerk
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Risk Description / Scope:

Failure to comply with UK data protection legislation and UK GDPR requirements, including the inappropriate use, loss, or unauthorised disclosure of personal data, resulting in regulatory action, financial penalty, reputational damage or loss of public trust.

Inherent/Fundamental Risk (E) (before controls)

Impact:	4	Likelihood:	4	Risk Score:	16
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How the Risk is Managed at Present (F)

Todmorden Town Council is registered as a Data Controller with the Information Commissioner's Office (ICO). A Data Protection Policy is in place, supported by privacy notices and fair processing information for staff and the public. Data protection requirements are embedded within day-to-day operations, with access to personal data restricted to appropriate purposes and handled in accordance with Council policies. Data protection considerations are taken into account when managing records, communications and information published in the public domain.

Residual/Remaining Risk (G)

Impact:	4	Likelihood:	3	Risk Score:	12
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
Why have you drawn this conclusion?	Appropriate policies and registration arrangements are in place, and there have been no reportable personal data breaches. Ongoing monitoring and compliance activity provide assurance that data protection risks are understood and managed.

What Controls are to be Implemented (K)

- Refresher data protection training for staff and councillors to reinforce awareness and good practice.
- Continued monitoring of legislative and regulatory developments, including post-Brexit guidance, to ensure ongoing compliance.
- Periodic review of data protection policies and privacy information to ensure they remain current and effective.

Date for Completion (L):	Ongoing
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Target Risk (M)

Impact:	3	Likelihood:	2	Risk Score:	6
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Risk 21: Operational Management /Delivery of Enabling Services

Category:	Legal/Reputational/Financial	Risk Owner:	Town Clerk
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Risk Description / Scope:

Failure to sustain effective delivery of the Council's core corporate functions and its enabling role due to loss of staff capacity or knowledge, increasing complexity of activity, or reliance on informal or evolving processes. This risk relates both to:

- core corporate functions, including finance, payroll, governance, statutory administration and council meetings; and
- the Council's enabling role, involving the facilitation, coordination or oversight of services, projects or activities delivered by others.

Inherent/Fundamental Risk (E) (before controls)

Impact:	5	Likelihood:	4	Risk Score:	20
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How the Risk is Managed at Present (F)

Day-to-day delivery of the Council's core functions is effective and supported by staff experience, established systems and documented procedures. Standard Operating Procedures (SOPs) are in place for key administrative processes and are actively used to support continuity, training and handover. The Council's enabling role is discretionary in nature and can be scaled in response to capacity pressures. Delivery is supported by staff knowledge, the use of outsourced providers where appropriate, and practical understanding of systems and processes. SOPs are maintained as working documents and continue to be developed and refined to reflect changes in roles, systems and responsibilities, reducing reliance on individual knowledge over time.

Residual/Remaining Risk (G)

Impact:	5	Likelihood:	3	Risk Score:	15
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
Why have you drawn this conclusion?	Core corporate functions are well understood and supported by documented procedures, providing a stable operational base. The enabling role is discretionary and flexible, allowing activity to be adjusted if required while procedural documentation continues to be strengthened.

What Controls are to be Implemented (K)

- Continue the development, review and maintenance of SOPs covering both core corporate functions and key enabling activities.
- Ensure SOPs clearly distinguish between statutory/core responsibilities and discretionary enabling work.
- Periodically review procedures with relevant staff to ensure they remain current, practical and reflective of how work is carried out.

Date for Completion (L):	Ongoing
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Target Risk (M)

Impact:	4	Likelihood:	2	Risk Score:	8
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Risk 22: Financial Risk Management

Category:	Legal/Reputational/Financial	Risk Owner:	Town Clerk
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Risk Description / Scope:

Risk of financial mismanagement or misuse of resources arising from increased precept income, cash balances or asset ownership, potentially resulting in financial loss, regulatory challenge, reputational damage or loss of public confidence.

Inherent/Fundamental Risk (E) (before controls)

Impact:	4	Likelihood:	4	Risk Score:	16
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How the Risk is Managed at Present (F)

The Council manages this risk through strong financial governance arrangements and internal controls. These include clear financial procedures, separation of duties, regular financial reporting, and the maintenance of appropriate reserves in accordance with policy. Financial information is produced and reported monthly, supported by independent scrutiny from the Council's external accountant. Oversight arrangements ensure that decisions relating to the use of financial resources are transparent, proportionate and subject to Member review.

Residual/Remaining Risk (G)

Impact:	4	Likelihood:	3	Risk Score:	12
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
Why have you drawn this conclusion?	Regular production of financial information, Member oversight and independent external scrutiny significantly reduce the likelihood of misuse of financial resources. Existing governance arrangements provide appropriate assurance that financial risks are identified and managed.

What Controls are to be Implemented (K)

The Council maintains a suite of financial governance documents, including the Financial Risk Register, Asset Risk Register and Internal Controls Document, which together provide a comprehensive framework for financial risk management. These documents are kept under review to ensure continued effectiveness and alignment with good governance practice.

Date for Completion (L):	Ongoing
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Target Risk (M)

Impact:	4	Likelihood:	2	Risk Score:	8
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Risk 23: Business Continuity and Emergency Resilience

Category:	Legal/Reputational/Financial	Risk Owner:	Town Clerk
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Risk Description / Scope:

Risk arising from major disruptive events that prevent normal operation of Council services, including loss of access to office accommodation, widespread public health emergencies, extreme weather, or other incidents affecting staff availability, buildings or systems. This may result in disruption to service delivery, governance, decision-making or statutory functions.

Inherent/Fundamental Risk (E) (before controls)

Impact:	5	Likelihood:	3	Risk Score:	15
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How the Risk is Managed at Present (F)

The Council has embedded business continuity and resilience arrangements that allow core functions to continue during periods of disruption. These include flexible working practices, a modern digital working environment, and the ability for staff to access systems, documents and communications remotely through Office 365. The Council is able to prioritise critical functions and adjust discretionary activity in response to emergency circumstances. Governance arrangements allow decision-making to continue where physical access to the office or normal working patterns are disrupted.

Residual/Remaining Risk (G)

Impact:	4	Likelihood:	2	Risk Score:	8
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
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Why have you drawn this conclusion?	The Council is no longer dependent on physical access to the office to maintain core operations or governance. Lessons learned from previous emergency situations are now embedded within business-as-usual arrangements, providing appropriate resilience to a range of potential disruptive events.
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What Controls are to be Implemented (K)

- Maintain and periodically review business continuity and emergency resilience arrangements.
- Keep under review guidance from relevant authorities during periods of widespread disruption.
- Ensure staff remain aware of flexible working and service prioritisation arrangements during emergencies.
- Ensure appropriate measures are put in place to protect the health and safety of staff and councillors during periods of widespread disruption, in line with relevant public health guidance.
- Such measures may include proportionate adjustments to working arrangements, meeting formats, or workplace controls where required.

Date for Completion (L):	Ongoing
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Target Risk (M)

Impact:	4	Likelihood:	2	Risk Score:	8
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Risk 24: Sponsor Role – Completion and Handover of Town Deal CV Park Projects

Category:	Legal/Reputational/Financial	Risk Owner:	Town Clerk
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Risk Description / Scope:

Risk arising from the Council's role as sponsor for the Town Deal CV Park projects, relating to the successful completion, commissioning and handover of the Bandstand and Pavilion. This includes risks associated with outstanding works, systems installation (e.g. CCTV and Wi-Fi), certification, compliance, and transition from construction to operational use.

Inherent/Fundamental Risk (E) (before controls)

Impact:	5	Likelihood:	3	Risk Score:	15
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How the Risk is Managed at Present (F)

The Council has overseen the delivery of the projects through appointed project and financial management support, including specialist construction phase management. The initial business case and funding compliance stages have been completed, and the projects are now in the final stages of construction and commissioning. Regular reporting arrangements are in place, and professional oversight continues to ensure that outstanding works, system installations and certification requirements are completed prior to handover. The Council intends to obtain confirmation and certification of works and expenditure as part of the close-out process.

Residual/Remaining Risk (G)

Impact:	4	Likelihood:	3	Risk Score:	12
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
Why have you drawn this conclusion?	The projects have progressed beyond the highest-risk stages of feasibility and core construction. Remaining risks relate primarily to completion, commissioning and handover, which are being actively managed through professional oversight, reporting and defined close-out processes.

What Controls are to be Implemented (K)

- Completion and verification of outstanding works, including installation and commissioning of CCTV and Wi-Fi systems.
- Confirmation of compliance, certification and sign-off prior to formal handover.
- Transition of responsibility from project delivery arrangements to operational management, with clear documentation and handover records.

Date for Completion (L):	Within the project handover period
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Target Risk (M)

Impact:	3	Likelihood:	2	Risk Score:	6
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Risk 25: Ownership and Ongoing Availability of Wheels Park

Category:	Legal/Reputational/Financial	Risk Owner:	Town Clerk
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Risk Description / Scope:

Risk arising from the Council's ownership and ongoing operation of the Wheels Park, including potential injury, asset failure, unplanned maintenance costs or reputational impact if the facility is not inspected, maintained or managed appropriately, leading to reduced availability or closure.

Inherent/Fundamental Risk (E) (before controls)

Impact:	4	Likelihood:	4	Risk Score:	16
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How the Risk is Managed at Present (F)

The Wheels Park has been operational for approximately five years with no reported incidents, providing assurance that the facility is robust and well used. During this period, regular inspections have been undertaken by Calderdale MBC, including ROSPA inspections. Day-to-day condition and safety are monitored through routine visual checks and grounds maintenance activity. A new Grounds Maintenance contract will include regular inspections, and maintenance works to support ongoing safe operation of the facility.

Residual/Remaining Risk (G)

Impact:	4	Likelihood:	3	Risk Score:	12
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
Why have you drawn this conclusion?	The facility has demonstrated a strong safety record over several years of operation. Routine inspections, inclusion within a new Grounds Maintenance contract and insurance arrangements provide appropriate assurance that ownership risks are being effectively managed.

What Controls are to be Implemented (K)

- Arrange for annual independent ROSPA inspections following the withdrawal of Calderdale MBC from this role.
- Continue regular inspection and maintenance through the Grounds Maintenance contract to ensure the facility remains safe and fit for purpose.

Date for Completion (L):	Ongoing / aligned to inspection cycles
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Target Risk (M)

Impact:	4	Likelihood:	2	Risk Score:	8
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Risk 26: Deployment and Use of CCTV at Bandstand and Pavilion

Category:	Legal/Reputational/Financial	Risk Owner:	Town Clerk
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Risk Description / Scope:

Risk arising from the deployment, operation and management of CCTV systems at the Bandstand and Pavilion, including risks of non-compliance with data protection legislation, inappropriate use of footage, system failure, reputational damage or public concern regarding surveillance.

Inherent/Fundamental Risk (E) (before controls)

Impact:	4	Likelihood:	4	Risk Score:	16
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How the Risk is Managed at Present (F)

The Council has identified the need for CCTV at the Bandstand and Pavilion as part of its approach to asset protection, public safety and incident response. CCTV systems are being installed as part of the commissioning and handover process. The Council is registered as a Data Controller with the Information Commissioner's Office (ICO) and has Data Protection policies in place. Consideration is given to privacy, proportionality and lawful purpose in the deployment of CCTV. Operational access to CCTV footage will be restricted and managed and arrangements will align with existing information governance and data protection controls.

Residual/Remaining Risk (G)

Impact:	4	Likelihood:	3	Risk Score:	12
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
Why have you drawn this conclusion?	CCTV is being deployed for clear and legitimate purposes, with existing governance arrangements in place to manage data protection and information security risks. With appropriate controls, the residual risk is considered manageable and proportionate.

What Controls are to be Implemented (K)

- Ensure CCTV deployment complies with UK GDPR, the Data Protection Act and ICO guidance, including clear signage and documented purposes.
- Confirm and document access controls, retention periods and procedures for review, storage and disclosure of footage.
- Provide appropriate staff awareness and training in relation to CCTV operation and data protection responsibilities.
- Periodically review the necessity and effectiveness of CCTV arrangements to ensure continued proportionality.

Date for Completion (L):	Prior to and following commissioning of CCTV systems, then ongoing
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Target Risk (M)

Impact:	3	Likelihood:	2	Risk Score:	6
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Risk 27: Facilities Management – Safe and Compliant Operation of Council Buildings

Category:	Legal/Reputational/Financial	Risk Owner:	Town Clerk
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Risk Description / Scope:

Risk arising from failure to adequately manage the ongoing facilities management requirements of Council-owned buildings, the Bandstand and Pavilion. This includes risks associated with statutory compliance, health and safety, and building condition, where failure to carry out appropriate inspections, testing or maintenance by suitably qualified professionals could result in injury, legal non-compliance, unplanned costs or reputational damage.

Inherent/Fundamental Risk (E) (before controls)			
Impact:	4	Likelihood:	4
Risk Score:			16

How the Risk is Managed at Present (F)

The Council recognises that the Bandstand and Pavilion require structured facilities management arrangements once operational. Staff are aware of the need for regular inspections, testing and servicing by appropriately qualified professionals, including (but not limited to) fire safety, legionella control and other statutory or best-practice checks relevant to the use of each building. A Facilities Management plan is in place, supported by relevant policies and procedures, to ensure that responsibilities are understood and that required checks and maintenance are identified, scheduled and recorded. Where specialist knowledge or certification is required, the Council relies on competent external contractors to carry out inspections and works.

Residual/Remaining Risk (G)			
Impact:	4	Likelihood:	3
Risk Score:			12

Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
Why have you drawn this conclusion?	Facilities management risks are recognised and actively planned for. Staff awareness, use of qualified professionals and the existence of an FM plan with supporting policies provide appropriate assurance that compliance and safety requirements can be managed proportionately.

What Controls are to be Implemented (K)

- Maintain and review a Facilities Management plan covering Council buildings, including the Bandstand and Pavilion.
- Ensure statutory and best-practice inspections and servicing are carried out by appropriately qualified professionals and recorded.
- Keep facilities management responsibilities, schedules and supporting policies under regular review to reflect building use and operational experience.

Date for Completion (L):	Prior to and following commissioning of CCTV systems, then ongoing
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Target Risk (M)			
Impact:	3	Likelihood:	2
Risk Score:			6

Risk 28: Safeguarding of Vulnerable People

Category:	Legal/Reputational/Financial	Risk Owner:	Town Clerk
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Risk Description / Scope:

Risk arising from failure to appropriately safeguard vulnerable people (including children and adults at risk) who may come into contact with the Council's activities, facilities, events or services. This includes the risk of harm to individuals, legal non-compliance, reputational damage, or loss of public trust.

Inherent/Fundamental Risk (E) (before controls)

Impact:	5	Likelihood:	3	Risk Score:	15
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How the Risk is Managed at Present (F)

The Council has a Safeguarding Policy in place. All staff hold **enhanced DBS checks**, which are reviewed and updated annually. Safeguarding awareness forms part of staff induction and ongoing professional awareness, ensuring that staff understand how to recognise concerns and how to report them appropriately. Where the Council works alongside partner organisations or volunteers, safeguarding expectations are communicated and responsibility is clearly understood.

Residual/Remaining Risk (G)

Impact:	5	Likelihood:	2	Risk Score:	10
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
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Why have you drawn this conclusion?	Safeguarding risks are recognised and taken seriously. Enhanced DBS checking, a clear safeguarding policy, and staff awareness provide appropriate assurance that risks can be identified early and managed in line with best practice.
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What Controls are to be Implemented (K)

- Maintain and periodically review the Council's Safeguarding Policy to ensure it remains current and effective.
- Continue annual review and renewal of enhanced DBS checks for staff.
- Refresh safeguarding awareness for staff as appropriate, particularly where activities or facilities bring the Council into closer contact with vulnerable people.
- Keep safeguarding arrangements under review as the use of Council facilities and events programme evolves.

Date for Completion (L):	Ongoing
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Target Risk (M)

Impact:	4	Likelihood:	2	Risk Score:	8
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Risk 29: Control of Access and Key Management for Council Facilities

Category:	Legal/Reputational/Financial	Risk Owner:	Town Clerk
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Risk Description / Scope:

Risk arising from the loss of control over access to Council-managed facilities, including the Bandstand and Pavilion, through the issuing, duplication or misuse of keys. This includes risks of unauthorised access, damage, theft, safeguarding concerns, or difficulty establishing responsibility following an incident.

Inherent/Fundamental Risk (E) (before controls)

Impact:	4	Likelihood:	4	Risk Score:	16
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How the Risk is Managed at Present (F)

The Council has taken a controlled approach to key management. Requests for large numbers of physical keys have been refused to limit the risk of uncontrolled duplication and access. Access arrangements are structured to minimise risk:

- Keys to the Bandstand are issued to the Bandstand volunteer group on a controlled basis.
- The Pavilion will operate using a key safe, with access managed for the Bowling group.

The Council is aware of the residual risk that keys could be copied without authorisation once issued and recognises the importance of clear access arrangements and accountability.

Residual/Remaining Risk (G)

Impact:	4	Likelihood:	3	Risk Score:	12
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Tolerance Level of Risk (H)

Level of Risk Acceptable? (Y/N)	Yes
Why have you drawn this conclusion?	The Council has limited the number of keys in circulation and avoided issuing unrestricted access. While some residual risk remains once keys are issued, the approach taken is proportionate and recognises the balance between access and control.

What Controls are to be Implemented (K)

- Maintain a clear record of issued keys and access arrangements for Council facilities.
- Set clear expectations with user groups regarding key use, non-duplication and responsibility.
- Review access arrangements periodically and following any incident or change in facility use.
- Consider alternative access controls (e.g. key safes, controlled access systems) where appropriate to reduce reliance on physical keys.

Date for Completion (L):	Ongoing
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Target Risk (M)

Impact:	3	Likelihood:	2	Risk Score:	6
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