BLACK SLUICE
INTERNAL DRAINAGE BOARD

Audit & Risk Committee Meeting

Wednesday 26th April 2017 at 2pm

Station Road, Swineshead, Lincolnshire PE20 3PW

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Internal Drainage Board

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Our Ref: IW/DPW/B10_1 Your Ref: Date: 13th April 2017

To the Chairman and Members of the Audit & Risk Committee

Notice is hereby given that a Meeting of the Audit & Risk Committee will be held at the Offices of the Board on Wednesday, 26th April 2017 at 2pm at which your attendance is requested.

Chief Executive

AGENDA

1. Apologies for absence
2. Declarations of Interest
3. To receive and if correct sign the Minutes of the Audit & Risk Committee Meeting held on the 28th September 2016 **(pages 1 - 15)**
4. Matters arising
5. To receive the Annual Internal Audit report 2016/17 **(pages 16 - 24)**
6. To receive a Report on ADA Policies in Comparison to the Boards **(pages 25 & 26)**
   (a) To review the new Anti-Bribery Policy **(page 27)**
   (b) To review the new Electronic Information and Communication Systems Policy **(pages 28 - 34)**
7. To review the following Board policies:

(a)	Members Code of Conduct	**(pages 35 - 42)**
(b)	Risk Management Strategy	**(pages 43 - 67)**
	(i) Risk Analysis 1.5 & 1.6 Operating Boards Machinery	**(pages 68 - 70)**
	(ii) Risk Analysis 8.5 Cyber Security Report	**(pages 71 - 77)**
(c)	Delegation of Authority	**(pages 78 - 81)**
(d)	Whistleblowing Policy	**(pages 82 - 87)**
(e)	Rechargeable Commercial Works	**(page 88)**
(f)	Rechargeable Public Sector Cooperation Agreement	**(page 89)**

8. To review the Period 11 Board's Management Accounts **(pages 90 - 92)**
9. To receive the Risk Register **(page 93)**
10. To review the Board's Catalogue of Policies **(page 94)**
11. Any other business

BLACK SLUICE INTERNAL DRAINAGE BOARD

MINUTES

of the proceedings of a meeting of the Audit & Risk Committee

held at the offices of the Board on
28th September 2016 at 1pm

Members

Chairman - * Cllr M Brookes

* Mr W Ash	* Mr V A Barker
* Cllr R Austin	* Mr R Leggott
* Cllr B Russell	* Mr N J Scott

* Member Present

In attendance: Mr I Warsap (Chief Executive)
Mr D Withnall (Finance Manager)
Mr J Cooke (Towergate Insurance) attended for Agenda Item 5

The Chairman welcomed members to the meeting thanking them for agreeing to an earlier start. He outlined the programme for the meeting stating that Mr John Cooke from Towergate Insurance will be attending at 2pm.

1003 APOLOGIES FOR ABSENCE - Agenda Item 1

There were no apologies.

1004 DECLARATION OF INTEREST - Agenda Item 2

There were no declarations of interest.

1005 MINUTES OF THE AUDIT & RISK COMMITTEE MEETING – Agenda Item 3

Minutes of the last meeting held on the 27th April 2016, copies of which had been circulated, were considered and it was agreed that they should be signed as a true record.

1006 MATTERS ARISING - Agenda Item 4

(a) Risk Management Strategy - Minute 929(a)

Mr V Barker asked if the BSIDB workmen had been invited to the Black Sluice pumping station. The Chief Executive answered that so far there has only been one event and they did not receive an invite. He added that it had been genuinely overlooked by the Environment Agency and confirmed that they will be invited to the next one.

(b) The 9 Metre Byelaw Policy - Minute 935

The Chairman suggested that the following policies would be better reviewed by the Bridges and Culverts Committee who have the expertise and are formulating other policies that these were dependent upon.

B2 Standard conditions for relaxing byelaw No 10 (the 9 metre byelaw)
C2 Standard conditions of structures in watercourses
C3 Policy on Culverting
C4 Specifications for works in a Board maintained watercourse
C5 Guidance on piping or filling in watercourses (or other works in or near a watercourse)
C6 Specifications for works in a privately maintained watercourse

The Committee unanimously agreed to the Chairman's proposal.

The Chief Executive presented the 9 metre byelaw policy in the agenda papers along with the standard conditions for relaxing a byelaw policy which go out together.

He highlighted changes to section 6.8 "Electricity Poles Lighting Columns etc." by adding this note "(to ensure the correct safe working distance, the minimum clearance distance from ground level may increase depending on the voltage of the wire)" he stated that this is a typical addition and there are no specific measurements or conditions, just additional information. He added that this has been amended by himself and other Officers and asked the Members to review and highlight any observations, then once approved the new policy is to be implemented and presented to the Board.

Cllr R Austin asked, as electricity lines near works must be a major hazard does this have any impact on the insurance? The Chief Executive answered that currently the insurance covers damage to or relating to electricity poles or any other apparatus. He stated that this is clearly one of the purposes of this byelaw moving forward even though historically there are cables above ground within 9 metres but in the future this document will control the application process. If we do have a relaxation of the 9 metre byelaw it is clearly documented and identified on the Boards GIS mapping system so we are aware of those cables in closer proximity to Board maintained watercourses. He added now the correct procedure will be implemented going forward, recorded and documented but clearly for any unconsented works in the past we will still have issues. He clarified that regarding insurance we will be adequately covered if we had such a strike.

Cllr B Russell added that from the insurers point of view we are covered by employer's liability if there is any damage or injury to an employee involved in such acts.

Mr V Barker stated that the members understand the wording used in these policies but somebody could look at them and refer to three or four different words relating to distance in terms of tow, brink, centre and bank being in one place plus 9 metres from the tow, 9 metres from the centre, 9 metres from the brink and they are all different things. He asked could the words be standardised.

The Chief Executive answered by saying that he understands where Mr Barker was coming from in layman's terms but it would be very difficult to standardise i.e. an underground pipe to say 9 metres from the brink of the pipe that should be edge of the pipe. The purpose of this wording is in relation to the relaxation of the 9 metre byelaw and he is sure if anyone had difficulty in understanding they would need to have negotiations with one of the Officers to understand, particularly on the three cross sections diagrams, where we are showing the different types of embanked watercourses, open watercourse, or a piped culvert because there are different points of reference and people think a drain is a drain, but they are different. He acknowledged but felt the Officers would be able to address these issues prior to the application being completed and submitted.

Mr R Leggott stated he agrees in the main with the policy on relaxing the byelaw but perhaps a few items need defining a bit better, he detailed the following;

No 5 Guidelines – he looked at the list and felt it is missing cesspits and digestion units; the Chief Executive answered in global terms this consent is for anything within 9 metres we don't have to list or document all. The Chairman agreed that it is a good point as it is something which is placed into the ground. Cllr B Russell added that if you start listing specific things once you miss something out you can come into problems so a generic term would be better looked for.

No 5.1 last line - "distance from the drain as the existing building", he recommended adding "existing building on that property" because someone will look at one nearby and say that's different and if they can do it, I can do it. The Chief Executive stated that the relaxation is pertaining to that property and it will be amended.

No 5.3(b) – he noted if we are looking for give and take because we can give on one side and take a bit the other with a little bit of encouragement in some cases but what happens if both sides are actively applying for something at the same time? The Chief Executive answered that each application is looked at within its own merits, should two applications come in at the same time that would be brought to Committee for a decision.

Standard Conditions No 3 – states "the Board accepts no liability for any structural damage" but thinks "structural" should be removed – Members agreed.

The Chief Executive concluded the most significant change is on the cross section turning this into a true 9 metre byelaw whereas before the last culverted watercourse used to be 4.5 metres from the centre pipe. We have changed to 9 metres with no difference to whether it is a watercourse with or without embankments, they are all now culverted watercourses, people can still apply to have a relaxation but we are now going with the standard 9 metres.

The Chief Executive concluded by saying for member's information, most of the IDBs throughout the country go to 9 metres; and recently an engineer from Mid Level IDB implemented a 21 metre byelaw consent.

Mr N Scott referred to the Standard Conditions No 6 where it talks as if you are committing yourself to indemnifying the Board but does not actually say that. By putting in an indemnity the applicant will indemnify the Board if any damages were to be caused is quite an easy language to prove in law and to make your claim

against. If you have an indemnity from the applicant, you know if they are going to put a building or a pole or a fence whatever it is and cause some damage or slippage or issues if they have indemnified you for damages then that is quite a simple recourse to follow. The Chief Executive clarified this point so we can implement it on the consenting application. Mr Scott clarified if you say "the applicant will indemnify the board for any loss or damage caused". The Chairman agreed that this should be incorporated – all agreed.

Mr N Scott asked if a lawyer reads through these policies or do we produce them ourselves? The Chief Executive answered historically they have been produced with ADA in the back ground and they have probably gone to lawyers but we know we have got to the point that these have been looked at several times, whether we should consider these being looked at by a legal expert. He added that is for this Committee to agree the way forward and find the budget. The members agreed that it is important that people are able to interpret these policies. Cllr B Russell added he would not want to involve a lawyer and that using generalisation of wording and as part of this review, this Committee has picked up wording as part of the Boards examination, the descriptive terms associated with drainage boards are well known because as an IDB we know more of what we are doing.

The Chairman asked the Committee to recommend the 9 metre byelaw policy to the Board – all agreed.

1007 TO RECEIVE A REPORT ON INSURANCE RENEWAL - Agenda Item 5

The Chairman asked members to have a discussion on the insurance renewal before Mr John Cooke joined the meeting.

Cllr B Russell asked a question regarding page 22 the Combined Policy surface structures – this is something we should look at very carefully, the Insurance company is not saying that you must do it, they are saying that it might be prudent but the increase in premium seems excessive. The Finance Manager stated that the NFU (previous insurers) gave the Board a quote to cover 5 months' insurance to the end of our term which equated to an annual premium increase of £25,000 for the sub structures to be included and increase the building value. He added this current renewal has included sub structures with an increase of £4,700 actually compared to NFU quote for £25,000, this quote is more where we should be and based on the additional value and additional cost because these are actual rebuild costs for an extra £28 million of cover £4,700 is not unreasonable.

Cllr B Russell stated he had an unfortunate impression of NFU, in his past history they are very good and very expensive. The Chief Executive added that full loss insurance is on the two pumping stations alongside the main sea line defence, Wyberton and Kirton Fen whereby an extreme tidal surge could wash the banks away around them and arguably just fall over but for the other 32 pumping stations the sub structure are all-encompassing below ground level the Board is not covered for and if they are going to be knocked down, vandalised, tidal surge, whatever realistically the nuts and bolts of it will remain. We asked NFU to give a quote because this Committee and others had requested one but it actually scared us away from it.

Cllr B Russell concluded they would not wish to give cover for either subsidence or ground movement but basically you should know and have information on that but you are not talking about trees growing close.

The Chief Executive agreed with the Finance Manager that £4,700 for the additional sub structure cover is a good deal. The Chairman added that after consultation with the Finance Manager and the Chief Executive he came to the same conclusion.

Cllr B Russell asked is it an all risk cover? The Chief Executive answered it would be a question to ask Mr Cooke today.

The Chief Executive reported over the last year the Officers have tried to build up a relationship with John Cooke in the same way we had the relationship with Phil Ingleby (NFU) as we did not know a lot about Towergate Insurance. He explained he had spoken to other IDBs in the County asking who their insurers were and they introduced the company Towergate, subsequently the Officers found out that Towergate cater for 30 to 40 other IDBs in the Country. They have the expertise and the Officers have been quite encouraged by Mr J Cooke's level of expertise within the IDB industry.

Mr N Scott asked who is the insurer on the combined policy? The Finance Manager answered the combined policy is with Allianz, the motor fleet is with Equity Red Star and the indemnity for directors and officers was still left with NFU as it overran by a year at renewal date, after the renewal date was moved from April to September. This Finance Manager concluded that this policy has ended now and at this renewal Towergate will pick that up.

Cllr B Russell stated that within the industry it used to be that 2.5% was added for site clearance and 5% of the sum insured for underground damage, damage to drains pipes and foundations so you would usually add 7.5% onto your sum insured, the premium for this renewal quotation seems even less than that percentage.

Mr N Scott asked have we been with Towergate for one year or is Towergate quoting to get the business from NFU? The Chief Executive answered we are currently approaching the end of the first year with Towergate Insurance. Mr Ash pointed out that the price we are paying at the moment is less than we paid the NFU in 2014. The Finance Manager stated that this is last year's quote and John Cooke will be bringing this year's renewal terms with him today.

Mr Barker expressed that the £4,700 seems a very good quote for the underground structures. He suggested that the Board could consider looking at the larger pump houses and then look at the single and double pump houses separately. The Chief Executive reminded the members that Jacksons Engineers had carried out a study on all of the Boards pumping stations, if there were to be rebuilt tomorrow how would they be rebuilt. Jacksons Engineers had produced an excellent report detailing the cost and method of rebuilding all the Boards pumping stations, these valuations were used by Towergate in supplying the quotation, in theory if the Board were claiming on a rebuild it would be on the new configuration of pumping station with the sub structure in whatever format.

Mr N Scott asked if that was where the £27 million comes from as it seems a funny number for an insurance company to come to; the Chief Executive and the Finance Manager stated that they have provided those figures to Towergate. Mr N Scott read from Towergates' quotation regarding the upper and lower structures this is an issue it should be defined correctly. The Chief Executive answered that they have tried to define it, there is a ground level and this pertains to everything below it and part of the motor and some of it is above ground, it could be awfully complex if there was to be a claim.

Mr Scott asked what is underground? The Chief Executive answered that the substantial amounts of rebuild costs associated are with costs below ground level, being amounts of reinforced concrete and the flumes. The Chief Executive added that including the entire pumping station will remove any of the contentious issues if we ever make a claim because we will be fully covered.

Mr John Cooke arrived at the meeting and was invited by the Chairman to go ahead with his item.

Insurance Law Reform Act 2016

Mr J Cooke stated that for issues that are not already insured but other issues that were pertinent for general consideration at the beginning of the document he had put the Insurance Law Reform Act 2016 on page 21. This legislation which came into effect in Summer 2016 regarding declarations of the full facts and information provided to insurers which need to be made on the insurances, there are changes to the law in respect of warranties and conditions which apply to insurance policies. In affect there has been a trade-off that much more information goes to the insurers at the start and in return for that they ease off with the requirements, conditions and the circumstances under which they can turn down insurance claims. He believes in some ways its quite a good piece of legislation for policy holders in other ways it puts a little bit more responsibility both on the Board and Towergate to make sure we have all the necessary information produced and provided for insurers, all in all it is positive for policy holders.

Insurance of the underground structures under the buildings cover

Mr Cooke stated that one of the main concerns identified is the exclusion of the substructures at pumping stations and that he believed that underground structures should be included. If they are not included and there was damage to both under and over ground structure, what is the over ground structure going to be built on in the event there is substantial damage for whatever reason.

The Chief Executive enquired as to the claims history relevant to other IDBs below ground claims at pumping station; Mr Cooke answered he has had two in 25 years, one was impact damage from a piece of machinery which took a big chunk out of the corner which weakened the building leading it to be reconstructed, the other had been subsidence to an underground structure that was able to be repaired relatively cheaply but if the whole lot was to subside you cannot rebuild the surface structure until the underground structure has been resolved.

The Chief Executive asked if subsidence would be included in a policy incorporating the substructures? Mr Cooke confirmed that subsidence is included and also earth quake is covered.

Cllr Russell asked is there any difficulty where we have a structure that has a ground level but also a sub-basement level, or chamber? how do you define which is above ground and which is underground? Mr Cooke answered that yes it can be tricky on some of the buildings. The Chief Executive explained that his terminology of above ground level is the floor level in relation to threshold level of the door as you step into the pumping station very similar to external ground levels.

Mr Cooke said that it frequently is and all the machinery below the ground would be covered because it is part of the machines moving parts.

Mr Scott asked at what stage are you at the moment, you have gone to market and you have quotes here for us today; Mr Cooke answered that it is the number from the existing insurers which is Allianz; he added that we do an exercise each year because we look after so many IDBs we do an overall exercise to use the buying power for an overall trade, as the insurers know the trade they appreciate the risk of the trade and they buy into the benefits of the way that an IDB works and is governed. Mr Scott asked is this Board in the drainage board package, Mr Cooke stated correct and added that he has just started the one for 2017. Mr Scott asked which insurers do you go to; Mr Cooke stated all of the main insurers and some of the not so main insurers, they are all financially secure insurers, it's the main 10 to 20 insurers and for various risks we go to Lloyds and other London markets as they are more specific and specialist in the type of insurance that they deal with. At the moment this one is Allianz the main combined policy is with Allianz, the engineering cover is with Allianz and the motor is with Equity Red Star. Mr Scott asked if he had viewed the previous NFU policy; Mr Cooke answered at different times yes; Mr Scott asked in terms of like for like; Mr Cooke replied some of it is like for like and some is better because some of it is specialist for drainage boards so that it's as good as anything out there. Mr Scott asked do you have 30 IDBs; Mr Cooke answered no, more than 30 he stated he looks after 47.

Cllr Russell asked if you are insuring IDBs in a group to the market is the main risk being taken by a panel of insurers or one individual insurer? Mr Cooke answered at the moment it is one individual insurer; Cllr Russell added it must be getting to the point where you would be looking at having two companies involved in a proportional? Mr Cooke answered at the present time we are in discussion with AXA on another individual board which is a tester to see how they perform with that board. At the moment we have all of the boards with Allianz and we do an annual revamp and broker the whole thing. We go to the major insurers with all of the policy information for all of the boards; Cllr Russell asked is that on the basis of a package for all boards? Mr Cooke answered yes. Cllr Russell asked does that gives you a lot of buying power in the market. Mr Cooke answered yes it does in one way but in another way it also provides for considerable protection for individual boards which might suffer losses or significant losses at different times because it dissipates into the overall size of the premiums. If a board has a particularly bad year one year then an insurer will only look at it to a certain extent because it is only one particular board, if the Board was on its own if it has a bad claims year one year it could end up with premiums increasing considerably.

The Chairman acknowledged that the Committee has asked all the questions regarding this item and if anyone thinks of anything more then we will come back to Mr Cooke.

Terrorism Risks

Mr Cooke then stated that the next item is straight forward. It is a quotation for terrorism which is a fairly straight forward as he has not had any claims for terrorism for IDBs. The Committee did not believe that the risk was substantial enough to consider insuring.

Fidelity Guarantee

Mr Scott asked who is initiating the increase in cover? Mr Cooke answered it is to make sure we are protected to the correct extent.

Mr Scott asked if the fidelity cover is just for the employees defrauding and Mr Cooke answered it included Board members and employees.

Management Liability Insurance

Mr Cooke had looked to see if it would be advantageous to increase the limit of indemnity on the management liability insurance from £2 to £3 million. As it happens the cost of increasing to £3 million with an alternative insurer is cheaper than the £2 million option that the Board presently have.

The Finance Manager asked if this is something which is ongoing because we don't want to be looking at increasing that now if we suddenly get a hike in 12 months' time. Mr Cooke agreed there is little point in that, the cover is the standard rates for the insurer and also includes some employment law protection as well

Mr Barker asked about claims from all industries, is £3 million sufficient? Mr Cooke stated that in his view the £3 million is more than most people have.

Professional Indemnity Insurance

Mr Cooke then stated that hand in hand with the management liability is professional indemnity insurance, which has previously been with AIG, and gives protection largely against errors and omissions involved in planning consents and the like. The policy which has run for most drainage boards goes considerably beyond that and Mr Cooke's recommendation to go with this alternative policy because it does give wider protection. He said not to say drainage boards have large professional exposures because by and large they don't but there are certain exposures which arise in other areas which would be advantageous to insure against. In addition to that the limited indemnity in the policy at the moment is £1 million. With work being undertaken for the PSCA that requires a £2 million limit therefore the limit will have to be increased to £2 million, if undertaking work under the terms of the PSCA. The Chief Executive added that the Board is still in the process of challenging this as the purpose of the PSCA is to work under instruction not to offer any design to the work. Mr Cooke added that he does not see any PSCA risk whatsoever in the works the boards carry out under this Environment Agency contract. The Chief Executive stated that it is currently being reviewed by Ian Russell, in theory should we have an increase premium for such cost then the Board in turn should be recharging the EA for that premium.

Mr Cooke stated that in the event of any contractors having given you advice but then maybe wind the company up and cancels their insurance, the Board could be left without that support therefore it's important to have professional indemnity cover at the outset. Cllr Russell stated that is a good point and other Members agreed. Mr Cooke stated that this policy is a safety net in most instances.

Deception and Crime Insurance

Mr Cooke moved onto the newest style of insurance cover. Members will all be aware from newspaper reports of people who suffer from fraud & deception and lose money from bank accounts, conmen wheedle their way into your confidence and extract information from you that enables them to defraud you of money. For example, somebody in Russia/Poland sends out a fishing email that snags into one of your emails, replicates it and sends an email back into the office to say that a customer you deal with has changed their bank account details and could you please pay into this account instead of the original account. The number of victims who automatically alter their records so that monies are sent to the new fraudulent email address is quite alarming. The number of theft and burglary claims these days now are relatively minor but the number of these types of instances that are starting to appear is a definite increasing trend. Mr Cooke asked the Committee if they wished to investigate cover for this or are the current protections within the Board sufficient to withstand it. The Finance Manager answered that he believed the checks and training already in place is sufficient moving forward and certainly the exposure will be limited for excessive amounts the details would be checked. The Chief Executive added that cover will not stop the fraud happening obviously just protection for if it does. Mr Ash asked what the premium cost of this would be; Mr Cooke answered that it varies depending on the number of records but should not be a great deal. It does vary quite a lot taking into account the systems in place and the volume of electronic transactions and the amounts of the Boards electronic footprints throughout the market. The insurers look at that because it gives the initial indication as to the general exposures, there is also the secondary exposures to protection and processes within the office.

The Chairman asked Mr Cooke to clarify the cost of this policy to better inform the Members. Mr Cooke answered yes he would prepare a quotation. The Chief Executive expanded and asked if this policy was purely for cash transactions and also is there an excess payment; Mr Cooke answered that there could be an excess with this type of policy. The main client policies, Robson Alliance do one, where they are just a "crime policy" and it picks up burglary, theft, assault, deception and also a whole range of things. It could in the future become a class of insurance in its own, as it is robbery crime deception across the board.

Cyber Liability – cover for consideration

The Finance Manager asked does the deception include by means of cyber; Mr Cooke answered yes, there are some cyber policies around which include crime and that is where it starts to get a bit confusing. The Finance Manager clarified that the most common one at the moment is they find out the Chief Executive is away and send an email "before I went on holiday I forgot to process this payment can you do it today, immediately" alarm bells would ring in the case of this Board as it comes to the Finance Manager to authorise. Mr Scott added that if deception and crime covers cyber perhaps just look at one of those; Mr Cooke answered that for a group client policy which covers both cyber and crime there are other insurers that will cover cyber plus consequence crime arising as a result, the question is what they class as cyber and what they class as subsequent crime to cyber. The two can be different between a lot of insurers so you can get a little bit of crime cover and with other insurers you can get quite a lot of crime added in.

The Finance Manager answered that Cyber Liability cover has been considered and rejected before and we have introduced additional active support with our IT consultants as well as the enhanced systems and the unified threat management suite. The Finance Manager has attended cyber security briefings and is going to implement a training programme to the staff to cover things like what they should and should not click on email attachments. He will be attending a demo regarding a new system which prevents files from being encrypted and if it is a reasonable price it will be an advantage to get it sooner rather than later.

The Chairman asked that if this policy is a combined deception and crime insurance then it could be an interesting one. The Chairman then asked could Mr Cooke obtain a quote for review by the Members. Mr Cooke then added that the other side of the cyber protection is the data protection area, which provides an indemnity of actions against the Board in an event of unfortunate release of data or theft of data of any sort. There are new rules of how you should notify people who have been affected by it. The cost of that can bring in another important strand to a cyber-type of cover in addition to all the protections against viruses and other sorts of malware. The Finance Manager clarified by asking Mr Cooke whether these policies can be added after renewal, so that members are not required to make a decision for this renewal; Mr Cooke answered yes they can be added later.

Mr Cooke clarified that insurance cover for these types of things are worth considering now and in the future. Cllr Russell agreed it is worthwhile asking for a quotation.

The Chairman thanked Mr Cooke stating it had been very useful for this Committee to have him at the meeting and asked Members if there were any further questions.

Mr Scott asked what is the brokerage and is it moving or changing, is it a different rate for different policies; Mr Cooke answered that a couple of policies don't pay anything and the remainder of the polices pay a certain amount. Mr Scott asked what is that? Mr Cooke answered that he could work it out and then let the Committee know a specific figure.

Mr Cooke responded that it had been a worthwhile exercise and not enough IDBs did it. He left the meeting.

The Members had the general consensus that Mr Cooke had approached the subject well and answered all questions with a good knowledge in his responses.

Following further discussion, the Committee agreed to recommend to the Board that:

1. The underground structures of the pumping stations should be included in the insurance policy for the indicated premium of £4,714;

2. Terrorism insurance should not be taken out at a premium of £4,129;

3. The Fidelity Guarantee limit should be increased from £600,000 to £1,000,000;

4. Management Liability cover should be increased from £2,000,000 to £3,000,000 and include £1,000,000 Employment Law Protection with a reduction in premium;

5. Professional Indemnity insurance cover should be increased from £1,000,000 to £2,000,000 with a reduction in last year's Towergate premiums;

6. The Board should request a quote for the Deception and Crime insurance including cyber insurance.

Mr Leggott asked if the Board had another quotation? The Finance Manager answered no not this year as the Board negotiated a three-year agreement which gives a discount, assuming the renewal premium is not above the inflation rate which Mr Cooke has assured the Finance Manager it will not be, then we will continue to deal with Towergate for the next two years. Cllr Russell added that it is a good deal and agreed you get a better deal with a long term agreement.

1008 TO RECEIVE THE ANNUAL RETURN FOR THE YEAR ENDING 31 MARCH 2016 INCLUDING EXTERNAL AUDITORS OPINION - Agenda Item 6

The Finance Manager presented the completed Annual Return drawing attention to page 29 the External Auditors Report.

The Chairman remarked that it is excellent that we are in this position. Mr V Barker asked if the pension funds go to the Council and does it use SERCO? The Finance Manager responded that this is not affecting the Board, the pension fund is a Lincolnshire County Council local government pension scheme and administered by West Yorkshire Pension Fund so SERCO is not involved.

The Chairman concluded that the Members should congratulate the Finance Manager, Chief Executive and everyone involved – well done all agreed.

1009 TO RECEIVE THE AUDIT STRATEGY AND PLAN FOR 2016/17 - Agenda Item 7

The Finance Manager stated that Mr Gowing has reduced his internal audit time to 3.5 days and this is made up of testing transactions, feedback and comparing the Board with other IDBs. He asked the Committee if they would like to identify any areas for the Internal Auditor to look into and stated that this strategy was agreed at the meeting held on 27th April 2016.

The Chairman stated that it is as agreed, after a discussion with the Committee without Officers present, and has been acted on. The Chief Executive added that other IDBs have more number of days and it is unlikely that it will be reduced any lower than 3.5 days. Cllr B Russell highlighted that it was good that the auditor is only coming for half a day for systems review which must indicate that he is fairly comfortable and if you have a system that is right he just checks the system is being managed properly.

The Chairman asked the Finance Manager does this need to go to the Board with this Committees recommendation. The Finance Manager responded that as it did not go in June then it will need to go in November. The Committee agreed to recommended the Audit Strategy & Plan for 2016/17 to the Board.

1010 TO REVIEW THE POLICY FOR THE CONTROL OF RAGWORT - Agenda Item 8(a)

The Chief Executive stated that there are four policies for review, any amendments are highlighted in red and words lined through if deleted.

The Chief Executive explained that the "Weeds Act 1959" is to be deleted and the "Ragwort Control Act 2003" added.

Cllr B Russell asked how much of a problem is ragwort for the Board. The Chief Executive explained that it is not a problem for the Board but it does grow on banks. He reminded members that the Board does not own banks. He had reviewed the control methods on the internet, as pulling the ragwort can disperse its root, but we mechanically flail or hand cut only in areas that we cannot get the mechanical flail into. He explained that the pressure is on livestock banks and land adjacent to these banks. He also indicated that the EA are receiving a particularly large amount of criticism this year with regards to ragwort and they do own the banks. They tender out banks for livestock whether there is ragwort control involved through that tenancy is another matter. However, they are receiving criticism of ragwort along footpaths and bridle paths alongside banks which is for them to resolve with the tenant but it continues to be an expanding problem. Cllr Austin added that it has been a good ragwort year this year.

Mr V Barker stated that the problem is the arisings, because whilst it's growing it is bitter and livestock leave it alone but as soon as it's mown i.e. into hay or whatever it's sweet and that's the problem. He believed that the Boards operators ought to be aware of placing arisings into a grass field as a danger point.

The Chairman enquired presumably the operatives are aware of this? The Chief Executive answered yes as well as other more significant invasive species yes they are aware and also reminded at the pre-cutting brief every year.

Mr Ash asked whether if the operators see ragwort would they continue and mow the bank and is it up to the landowner to remove the arisings. He then asked is it the Boards responsibility to inform the landowner? The Chief Executive responded that as good practice if we came across a lot of ragwort on the brink of the bank growing into a field we would notify the landowner.

The Committee RESOLVED to recommend that the Policy for Control of Ragwort should be approved at the next Board meeting.

1011 TO RECEIVE THE POLICY ON TILE DRAINS DISCHARGING INTO BOARDS MAINTAINED WATERCOURSES - Agenda Item 8(b)

The Chief Executive presented the Tile Drains discharging into Boards maintained watercourses policy and stated that on this policy and others we are particularly trying to change the meaning with a word. The previous wording was policy on tile drains discharging into board watercourses which gives a lot of the concept to the layman that the Board own the watercourses that we maintain, in fact we don't own many of these watercourses at all. Changing the description by putting in the word "maintained" to read that they are "Board maintained watercourses" will make more emphasis. He added that we receive a lot of phone calls asking us "to get rats out of your banks" and we have to inform them that they are not our banks.

Mr Ash asked why the word tile? Although it is a regularly used word from the old concept of quarry clay pipes. Mr Scott said that when he read this he thought that as most of his are plastic that this perhaps should be changed to land drain?

The Chief Executive acknowledged that this is the purpose of putting these policies to committees. The Committee agreed that "tile drains" should be replaced with "land drains".

The Committee RESOLVED to recommend that the Policy on Land Drain discharging into Board maintained watercourses should be approved at the next Board Meeting.

1012 TO RECEIVE THE POLICY FOR CONTROL OF RABBITS, RATS & OTHER RODENTS IN BOARDS MAINTAINED WATERCOURSES - Agenda Item 8(c)

The Chief Executive stated that again the change is adding the word "maintained watercourses". The amendments to the Policy for Control of Rabbits, Rats & Other Rodents in Board maintained watercourses, and other amendments shown in red.

Mr Ash asked if badgers could be included in that policy? The Chairman answered no.

Cllr B Russell asked under the methods of control operations (c) is the problem only in the watercourse or is it associated with an adjoining site. The Chief Executive answered that historically we have gassed rats when we were allowed to but we have realised that gassing rats in the bank does not remove the problem. Many rats are in an adjoining building we therefore have had to investigate with the landowner just where the cause of the problem is coming from.

The Committee RESOLVED with the above amendments to recommend that the policy be approved at the next Board Meeting.

1013 TO RECEIVE THE GIFTS & HOSPITALITY POLICY - Agenda Item 8(d)

The Chief Executive stated that in section 6 the description has been expanded to include "relevant conferences, courses, equipment/plant inspections, suppliers or services" more in line with modern day working.

The Committee RESOLVED to recommend that the Gifts & Hospitality Policy should be approved at the next Board Meeting.

1014 TO REVIEW THE BOARD'S ANNUAL ACCOUNTS - Agenda Item 9

The Finance Manager stated that it is part of this Committees terms of reference to review the annual audited statement and the management accounts once a year, these are alternated and are included, the annual governance statement on page 46 has been reviewed in detail at the previous meeting because of the new guidance rules.

The Chairman asked the Committee members if there were any questions, the Committee reviewed and had no further questions.

1015 TO REVIEW THE BOARD'S CATALOGUE OF POLICIES - Agenda Item 10

The Chairman presented the catalogue of policies stating some have already been reviewed. The Finance Manager stated that from the 1st April 2016 it was expected that there would be a new ADA "White Book" which is the terms and conditions of service we share with other Lincolnshire ADA IDBs.

Due to the delay in the pay agreement it has not been issued and one of the big changes is that the grievance, disciplinary, capability and communication policies are all going to be completely removed from the White Book or placed in the annex, as ADA have been advised by a solicitor that they should not form part of the terms of conditions of service. This also applies to maternity pay, paternity pay and statutory sick pay all these elements will be dealt with under statutory law. The current sick pay terms are a lot better so will stay. This will mean that those policies may need to be reviewed. The solicitor actually said that the policies need to be simplified because when we have had to use them over the last 5/6 years, the solicitor thinks the disciplinary and capability procedures are over burdening and putting obstacles and extra actions in that they are not required. Once the White Book has been published then the Officers will look to see whether we adopt the policies as they are in the annexes or if the Officers bring new policies to this Committee.

The Finance Manager stated that the IT & Communications policy is outdated back from when the internet was first discovered, is based on dial up speeds and suchlike. He explained that this policy will need to be reviewed and others dependant on how they are integrated into the White Book.

The Chairman clarified to Members that we are looking at what policies are to be reviewed at the next meeting.

The Chief Executive confirmed that should these policies be required that they are brought to this Committee for review. The Finance Manager stated that if required these four policies will be brought to the meeting in April 2017. Also the Lone Worker Policy and the two rechargeable policies will be brought forward for review which were not due until April 2019. The Chairman added that in his opinion the Lone Worker Policy did need to be reviewed sooner rather than later. He explained that the contracts for lone worker devices is up for renewal at the end of 2017 so either April or September.

The Chairman then clarified that the Lone Worker Policy plus the additional possible four other policies should be reviewed at the meeting in April 2017, the Committee agreed. Mr Ash asked if the Lone Worker Policy should be reviewed more frequently say annually. The Chairman and Members agreed it would probably be best to review it annually.

1016 TO REVIEW THE RISK REGISTER - Agenda Item 11

The Chairman then presented the next item, a review of the risk register. The Finance Manager stated that the Committee reviewed this register at the April meeting in detail and then reminded the Committee of the items which are highlighted with a score of 4 or above. The Chairman added that nothing has changed since April 2016 and accepted the register as recorded.

1017 ANY OTHER BUSINES - Agenda Item 12

(a) Cyber Training

Mr Barker pointed out that the Finance Manager had referred to cyber training and asked if Board Members should have some training or something to make the Members more aware of what is happening. Mr Barker added that he would pay for the training.

The Finance Manager answered that he will probably be giving the training and if the Chief Executive is happy then you would be welcome to come along at no cost.

The Chairman clarified that when the Finance Manager is giving training to members of staff we could invite Board Members along. Cllr Russell then asked if there were routes in from Board Members systems perhaps equipment; the Finance Manager answered no.

The Chairman added that sitting on the local Councils, Councillors are being reminded of it all the time. Mr Leggott agreed that if Members could be invited to cyber training that would be very beneficial.

(b) Boston Barrier

The Chief Executive stated that the Boston Barrier Transport Work Act is currently in place and all the documentation is available. He added that he has reason to believe that it will be challenged and therefore go to enquiry which arguably is what the Environment Agency want because they will define the programme route. In theory every question that could be asked is inside the documents with drawings available. These are available for any member to take and review.

There being no further business the meeting ended at 3:15pm.

GOWING INTERNAL AUDIT SERVICES LTD

ANNUAL INTERNAL AUDIT REPORT

Black Sluice Internal Drainage Board April 2017

INTERNAL AUDIT REPORT

1 EXECUTIVE SUMMARY

1.1 I have completed the 2016/17 internal audit of the Black Sluice Internal Drainage Board in accordance with Governance and Accountability for Smaller Authorities in England (2016) Practitioners Guide.

1.2 The statutory basis for internal audit in local authorities in England (which includes Drainage boards) is a specific requirement in the Accounts and Audit regulations which requires that the organisation must maintain an adequate and effective system of internal audit of its accounting records and of its system of internal control.

1.3 The internal audit service is an assurance function that provides an independent and objective opinion to the organisation on the control environment by evaluating its effectiveness in achieving the organisation's objectives. It objectively examines, evaluates and reports on the adequacy of the control environment as a contribution to the proper economic, efficient and effective use of resources.

1.4 This audit included an implementation review of previous audit recommendations, review of any system changes, sample testing of 2016/17 transactions and provision of best practice advice gained through my audit of other IDBs. An audit of the Bourne Fen Farm Trust Fund has also been completed.

1.5 The main findings were:-

- well maintained and accurate financial records and transactions
- there is no anti-bribery policy
- the Bourne Fen Farm Trust Fund recorded income of £13,543 for the year ended 31 March 2016 which covers the rates payable and administration costs. The entries in the revenue account and balance sheet provided were supported by appropriate evidence.
- a governance concern was reported in 2015/16 and for this year there are two more concerns:-

  1) the 2016/7 pay award proposed by the Lincs ADA Pay and Conditions panel was 1% and an additional discretionary one-off payment of 0.4%. Most IDBs, including this Board, paid the discretionary 0.4% which is above the government public pay sector pay cap, although the Finance Manager believes this does not apply to IDBs and is seeking clarification. Although there was discussion at Executive and Board meetings about the pay award during 2016/7 there was no formal report or approval to pay this. It was also noted in one meeting (minute 982 (c)) that only one Lincolnshire Board rejected the 0.4%. This is incorrect as four of the Boards I audit rejected the 0.4%.

The 2017/8 pay award includes a second "one-off" discretionary 0.4%. Indications are that at least seven out of the twelve Boards I audit will not be paying this as they believe it breaches the Government pay cap and the previous award was a one-off payment; and

2) whistleblowing matters were reported to myself and investigated fully in accordance with the policy. Recommendations were made, agreed with management and reported to the Chairman of the Board and Chairman of the Audit and Risk Committee. It is good to report the recommendations have been implemented. However, the matter was reported verbally to the Executive by the Chairman of the Board and instead of being just for notification a discussion on the issues occurred. Some of the information provided / discussed was inaccurate. There was further discussion at the subsequent Board meeting. This is not in accordance with the whistleblowing policy and could be seen as detracting from the integrity of the policy and could deter future reports. The Board agreed that the policy should be reviewed. The current policy is in line with the ADA Whistleblowing model and all other IDBs and public sector bodies. Any change would be in conflict with this.

A detailed control test programme and results is available upon request.

1.6 Recommendations have been proposed, discussed and agreed with the Chief Executive and Finance Manager. A management action plan is in Section 3.

1.7 An interim audit should be undertaken to ensure continued implementation of good controls.

1.8 It is my opinion that, in respect of the areas covered by this report I can provide **adequate assurance** on the system of controls. There are no issues with the financial systems and controls but governance is a concern.

1.9 I would like to place on record my thanks for the co-operation and assistance given by all staff during this audit.

David Gowing
Gowing Internal Audit Services Ltd.
April 2017

EVALUATION CRITERIA

Substantial Assurance	There is a sound system of control designed to achieve the system objectives and the controls are being consistently applied.
Adequate Assurance	While there is a basically sound system, there are weaknesses that put a minority of the system objectives at risk and/or there is evidence that the level of non-compliance with some of the controls may put a minority of the system objectives at risk.
Limited Assurance	Weaknesses in the system of controls are such as to put most or all of the system objectives at risk and/or the level of non-compliance puts most or all of the system objectives at risk.
No Assurance	Control is poor, leaving the system open to significant error or abuse and/or significant non-compliance with basic controls.

2 FINDINGS

2.1 The annual return for boards with annual income or expenditure under £6.5million requires internal audit to provide certification on the following ten key control objectives. Any comment or issue on an objective is noted below otherwise the objective can be considered to be fully met:-

a) Appropriate books of account have been properly kept throughout the year.

b) Financial Regulations have been met, payments were supported by invoices, expenditure was approved and VAT was appropriately accounted for.

c) The Board assessed the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these.

d) The annual rating requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.

e) Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for.

f) Petty cash payments were properly supported by receipts, expenditure was approved and VAT appropriately accounted for.

g) Salaries to employees and allowances to Board members were paid in accordance with Board approvals and PAYE and NI requirements were properly applied.

h) Asset and investment registers were complete and accurate and properly maintained.

i) Periodic and year-end bank reconciliations were properly carried out.

j) Accounting statements prepared during the year were prepared on the correct accounting basis (receipts and payments /income and expenditure), agreed to the cash book, were supported by an adequate audit trail from underlying records, and where appropriate debtors and creditors were properly recorded.

3 MANAGEMENT ACTION PLAN

This action plan has been fully discussed and agreed with management.

The priority is based on the following;-

Critical
A control failure that is critical to the organisation's aims and objectives.
This will require immediate action by management.

High
A significant control weakness which is a significant risk to the service or organisation and is likely to lead to material loss or significant public criticism. This will require immediate action by management.

Medium
A control that undermines the effectiveness of internal control and may lead to some loss or some public criticism but does not represent a significant risk to the organisation. This will require prompt action by management.

Low
This might be important to the service but does not represent a significant risk for the service or organisation. This will require action by management but not necessarily immediate.

Recommendation	Priority	Management Comments	Responsibility for implementation and date
Agree and introduce an Anti-bribery policy	M	We believed that this was covered in Policy No.16 Fraud and Corruption Policy. ***Corruption*** *can be defined as – "the offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person".* And further in No.34 Gifts and Hospitality Policy. *Employees and members should treat with extreme caution any offer of a gift in excess of £25, favour or hospitality that is made to them personally. The person or organisation making the offer may be doing or seeking to do business with the Board or may be applying to the Board for some decision to be taken in his favour or someone with whom he is connected.* For the avoidance of doubt a new policy will be presented to the April 2017 Audit and Risk Committee for review with adoption by the Board at the June 2017 meeting. This will be in line with the ADA template policy.	Finance Manager June 2017 Board Meeting

When the 2017/8 pay award is reported to Executive / Board for a decision ensure that the additional 0.4% is recorded as a one-off discretionary payment in addition to the 1% even though it was a one-off for 2016/7. It should also be reported that it breaches the Government public sector pay cap. To ensure there is no conflict of interest there should be no officer recommendation in this report.	H	Confirmation on whether IDB's are constrained by the Public Sector Pay Policy was sought from HM Treasury and in the letter received they stated that; *The Government does not control pay in local government and devolved administrations.* Based on this guidance the Board has no reason not to pay to the discretionary 0.4% pay award as recommended by the Lincolnshire Branch of the Association of Drainage Boards. It is being proposed by the Pay and Conditions Committee to undergo a full Job Evaluation exercise at each Board to bring pay levels into line with industry to facilitate recruitment and retention, which is currently of concern to the Board. The Internal Auditor has been provided with a copy of this letter although disputes the interpretation. Further clarification has been sought from HM Treasury.	Finance Manager - June 2017 Board meeting.

		Internal Auditor Comment: Whilst the HM Treasury state they do no not control pay the Government clearly set a 1% pay cap to 2017/18 and all public sector bodies including Local Government have kept to this. IDBs are a public sector body and a majority of IDBs I audit have indicated they will not be paying this second "one-off" payment. However, they will be undertaking a job evaluation exercise.	
Consider a governance awareness training session for Members and staff.	M	This will be considered at the Executive Committee meeting	Board Chairman – Exec May 2017
Ensure the integrity of the Whistleblowing policy is maintained	H	This policy is due to be reviewed at the April 2017 Audit & Risk Committee meeting with adoption by the Board at the June 2017 meeting. It has been suggested that is it brought in line with the ADA template policy.	Finance Manager – June 2017 Board meeting.

BLACK SLUICE INTERNAL DRAINAGE BOARD

AUDIT & RISK COMMITTEE MEETING - 26th APRIL 2017

AGENDA ITEM No 6

REPORT ON ADA POLICIES IN COMPARISON TO THE BOARDS

Given the recent inference from David Gowing that our Whistle-blowing policy would not be in accordance with the ADA template and we were missing an Anti Bribery Policy. I have now concluded a review and comparison of all the Boards and ADA template policies and my findings are detailed below;

1. **Whistle-blowing Policy** – Our policy states that if the report relates to the Chief Executive then it should be made to the "Internal Auditor", this was discussed at the Executive and Board with the Executive Members agreeing they would be open to being contacted. The ADA template policy states the "Internal Auditor or Chairman of the Board". With the agreement of the Chairman I am therefore proposing that we match the ADA policy.

2. **Anti Bribery Policy** – Agree this was missing in this format but covered by the Gifts & Hospitality and Fraud & Corruption Policies. A new policy is presented at agenda item 6(a).

3. **Standing Orders** – The only difference refers to 'declaration of interests' during meetings. Ours is more stringent stating they should withdraw from the meeting where the ADA template states the Chairman decides what part, if any, the member can take part in. Normal review cycle.

4. **Members Code of Conduct** – There were significant sections missing compared to the ADA template and I have therefore amended in line with the ADA template presented at agenda item 7(a).

5. **Gifts and Hospitality** – Our policy is more stringent stating a financial limit of £25 instead of using the ambiguous wording "significant". Normal review cycle.

6. **Publication Scheme Guide** – Minor differences but presented in a different order. Normal review cycle.

7. **Employee's Code of Conduct** – Minor differences. Normal review cycle.

8. **Complaints Procedure** – ADA template states complaints must be in writing where ours does not specify. Normal review cycle.

9. **Anti-Fraud & Corruption** – The template still refers to the Audit Commission that no longer exists. It also refers to senior Board Members where we state Executive Committee Members. Normal review cycle.

10. **Risk Management Strategy** – As I wrote our Risk Management Strategy from scratch this is clearly my document although some small insignificant changes have been made. It is to be reviewed at agenda item 7(b).

Cyber Security and the Operating of Boards Machinery reports are at agenda item 7(b)(i) and 7(b)(ii) respectively.

11. **Critical Incident Policy** – This does not resemble anything we currently have although the themes are covered in our Emergency Plan. It may be that this could be more comprehensively covered in the next review of the Emergency plan to make sure everything is covered.

12. **Financial Regulations Guidance** – A template is not provided by ADA just three examples of good practice. I have no concerns with our Financial Regulations or any related policies. Normal Review Cycle.

13. **Delegation of Authority** – Our delegation of responsibility is comprehensive and covers duties of committee's as well as individuals. ADA have a template Division of Responsibilities between Chair and Chief Executive which is even more detailed and in our case would need to include the Finance Manager as the Responsible Financial Officer. Presented at agenda item 7(c).

14. **Electronic Information and Communications Systems policy** – This used to be included in the "White Book" but was very dated and did not reflect modern ways of working. We do need a policy but it may have to remain as it was in the White book until the September Audit & Risk Committee meeting due to timescales.

There is a lot of information there but I am happy that other than those identified for the April Audit & Risk Committee meeting we only have very minor insignificant differences to the ADA templates or we are more stringent.

Black Sluice Internal Drainage Board
Policy No: 19
Policy: Anti-Bribery

Review	Audit & Risk Committee on 26th April 2017
Board Approved	
Reviewed	Within 5 years

INTRODUCTION

The Bribery Act 2010 came into force on 1st July 2011 and is intended to modernise the law on bribery. Bribery can be defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

This Policy is intended to supplement the Group's Fraud and Corruption Policy.

POLICY

The Board:

- Take a zero tolerance approach to bribery. **Offering or accepting a bribe is not acceptable in any circumstances.**
- Are committed to acting professionally, fairly, ethically and with integrity in all business dealings and relationships.
- Are committed to implementing and enforcing effective systems to counter bribery.

The Board Prohibit: **The offering, giving or acceptance of any bribe, whether cash or other inducement, to any person or company by any individual employee, agent or other person or body acting on the Boards' behalf in order to gain any commercial, contractual or regulatory advantage in a way that is unethical or in order to gain any personal advantage, for the individual or anyone connected with the individual.**

Black Sluice Internal Drainage Board

Policy No: 43

Policy: Electronic Information and Communication Systems

Review	Audit & Risk Committee on 26th April 2017
Board Approved	
Reviewed	Within 5 years

INTRODUCTION

The Board's electronic communications systems and equipment are intended to promote effective communication and working practices within the Board, and are critical to the success of our business. This policy outlines the standards which the Board requires users of these systems to observe, the circumstances in which the Board will monitor use of these systems and the action we will take in respect of breaches of these standards. The sections below deal mainly with the use (and misuse) of computer equipment, e-mail, internet connection, telephones, and voicemail, but this policy applies equally to use of fax machines, copiers, scanners, CCTV, and electronic key fobs and cards. Workers are expected to have regard to this policy at all times to protect its electronic communications systems from unauthorised access and harm.

Breach of this policy may be dealt with under the disciplinary procedure and, in serious cases, may be treated as gross misconduct leading to summary dismissal.

POLICY

1. LEGISLATIVE FRAMEWORK

The use by workers and monitoring by us of our electronic communications systems is likely to involve the processing of personal data and is therefore regulated by the Data Protection Act 1998 together with the Employment Practices Data Protection Code, issued by the Information Commissioner. We are also required to comply with the Regulation of Investigatory Powers Act 2016, the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 and the principles of the European Convention on Human Rights incorporated into United Kingdom law by the Human Rights Act 1998.

2. PERSONNEL RESPONSIBLE FOR IMPLEMENTATION OF POLICY

2.1 The Board has overall responsibility for this policy. Responsibility for monitoring and reviewing the operation of the policy and any recommendations for change to minimise risks to our operations also lies with the Finance Manager. The Finance Manager will deal with requests for permission or assistance under any provisions of this policy, subject to their primary and priority tasks of maintaining our core systems, and may specify certain standards of equipment or procedures to ensure security and compatibility.

2.2 Managers have a specific responsibility to operate within the boundaries of this policy, to facilitate its operation by ensuring that workers understand the standards of behaviour expected of them and to identify and act upon behaviour falling below these standards.

2.3 All workers are responsible for the success of this policy and should ensure that they take the time to read and understand it, and to disclose any misuse of the Board´s electronic communications systems of which they become aware to the Chief Executive. Questions regarding the content or application of this policy should also be directed to the Finance Manager.

3. WHO IS COVERED BY THE POLICY

This policy covers all individuals at all levels and grades, including senior managers, officers, directors, employees, contractors, trainees, homeworkers, part-time and fixed-term employees, and agency staff (collectively known as workers in this policy), and also third parties who have access to the Board's electronic communication systems.

4. EQUIPMENT SECURITY AND PASSWORDS

4.1 Workers are responsible for the security of the equipment allocated to or used by them, and must not allow it to be used by anyone other than in accordance with this policy. If given access to the e-mail system or to the internet, workers are responsible for the security of their terminals and, if leaving a terminal unattended or on leaving the office, should ensure that they lock the computer to prevent unauthorised users accessing the system in their absence. Workers without authorisation should only be allowed to use terminals under supervision. Desktop PCs and cabling for telephones or computer equipment should not be moved or tampered with without first consulting the Finance Manager.

4.2 Passwords are unique to each user and must be changed regularly to ensure confidentiality. Passwords must be kept confidential and must not be made available to anyone else unless authorised by the Finance Manager. For the avoidance of doubt, on the termination of employment (for any reason) workers must provide details of their passwords to the Board.

4.3 Workers who have been issued with a laptop, tablet or mobile phone must ensure that it is kept secure at all times, especially when travelling. Passwords or biometrics must be used to secure access to data kept on such equipment to ensure that confidential data is protected in the event that the machine is lost or stolen. Workers should also observe basic safety rules when using such equipment, such as not using or displaying it obviously in isolated or dangerous areas. Workers should not use equipment on public transport or in other public areas where documents can be read by third parties.

5. SYSTEMS AND DATA SECURITY

5.1 Workers should not delete, destroy or modify existing systems, programs, information or data which could have the effect of harming our business or exposing it to risk.

5.2 Workers should not download or install software from external sources without authorisation from the Finance Manager. This includes programs, instant messaging programs, screensavers, photos, video clips and music files. Files and data should always be virus-checked before they are downloaded. If in doubt, workers should seek advice from the Finance Manager.

5.3 No device or equipment should be attached to our systems without the prior approval of the Finance Manager. This includes any USB flash drive, MP3 or similar device, PDA or telephone. It also includes use of the USB port, infra-red connection port or any other port.

5.4 We monitor all e-mails passing through our system for viruses. Workers should exercise caution when opening e-mails from unknown external sources or where, for any reason, an e-mail appears suspicious (for example, if its name ends in .exe or .zip). The Finance Manager should be informed immediately if a suspected virus is received. We reserve the right to block access to attachments to e-mails for the purpose of effective use of the system and for compliance with this policy. We also reserve the right not to transmit any e-mail message.

5.5 Workers should not attempt to gain access to restricted areas of the network, or to any password-protected information, unless specifically authorised.

5.6 Workers using laptops or wi-fi enabled equipment must be particularly vigilant about its use outside the office and take any precautions required by the Finance Manager from time to time against importing viruses or compromising the security of the system. The system contains information which is confidential to the Board's business and/or which is subject to data protection legislation. Such information must be treated with extreme care.

6. E-MAIL ETIQUETTE AND CONTENT

6.1 E-mail is a vital business tool but an informal means of communication and should be used with great care and discipline. Workers should always consider if e-mail is the appropriate medium for a particular communication. Messages sent on the e-mail system should be written as professionally as a letter. Messages should be concise and directed only to relevant individuals.

6.2 Workers should ensure that they access their e-mails at least once every working day, stay in touch by remote access when travelling and use an out of office response when away from the office for more than a day. Workers should not expect colleagues to read or reply to e-mails sent or received out of office working hours.

6.3 Workers should not send abusive, obscene, discriminatory, racist, harassing, derogatory or defamatory messages. If such messages are received, they should not be forwarded and should be reported to the Finance Manager. If a recipient asks you to stop sending them personal messages, then always stop immediately. Where appropriate, the sender of the e-mail should be referred to this policy and asked to stop sending such material. If you feel that you have been harassed or bullied, or are offended by material sent to you by a colleague via e-mail, you should inform the Finance Manager who will usually seek to resolve the matter informally.

6.4 Workers should take care with the content of e-mail messages, as incorrect or improper statements can give rise to personal or Board liability in the same way as the contents of letters or faxes. For example, in connection with claims of discrimination, harassment, defamation, breach of confidentiality or breach of contract. Workers should assume that e-mail messages may be read by others and not include in them anything which would offend or embarrass any reader, or themselves, if it found its way into the public domain. The Board's standard disclaimer should always be used.

6.5 E-mail messages may be disclosed in legal proceedings in the same way as paper documents. Deletion from a user´s inbox or archives does not mean that an e-mail is obliterated and all e-mail messages should be treated as potentially retrievable, either from the main server or using specialist software.

6.6 In general, workers should not:

(a) send or forward private e-mails at work which they would not want a third party to read;

(b) send or forward chain mail, junk mail, cartoons, jokes or gossip either within or outside the Board;

(c) contribute to system congestion by sending trivial messages or unnecessarily copying or forwarding e-mails to those who do not have a real need to receive them;

(d) sell or advertise using the systems or broadcast messages about lost property, sponsorship or charitable appeals;

(e) agree to terms, enter into contractual commitments or make representations by e-mail unless appropriate authority has been obtained. A name typed at the end of an e-mail is a signature in the same way as a name written in ink at the end of a letter;

(f) download or e-mail text, music and other content on the internet subject to copyright protection, unless it is clear that the owner of such works allows this;

(g) send messages from another worker's computer or under an assumed name unless specifically authorised;

(h) send confidential messages via e-mail or the internet, or by other means of external communication which are known not to be secure.

6.7 Workers who receive an e-mail which has been wrongly delivered should return it to the sender of the message. If the e-mail contains confidential information or inappropriate material (as described above) it should not be disclosed or used in any way.

7. USE OF THE WEB

7.1 When a website is visited, devices such as cookies, tags or web beacons may be employed to enable the site owner to identify and monitor visitors. If the website is of a kind described in paragraph 8.2, such a marker could be a source of embarrassment to the Board, especially if a worker has accessed, downloaded, stored or forwarded inappropriate material from the website. Workers may even be committing a criminal offence if, for example, the material is pornographic in nature (see section on Inappropriate Use of Equipment and Systems at paragraph 10).

7.2 Workers should not therefore access from the Board's system any web page or any files (whether documents, images or other) downloaded from the web which, on the widest meaning of those terms, could be regarded as illegal, offensive, in bad taste or immoral. While content may be legal in the UK, it may be in sufficient bad taste to fall within this prohibition. As a general rule, if any person within the Board (whether intended to view the page or not) might be offended by the contents of a page, or if the fact that the Board's software has accessed the page or file might be a source of embarrassment if made public, then viewing it will be a breach of this policy.

7.3 Workers should not under any circumstances use our systems to participate in any internet chat room, post messages on any internet message board or set up or log text or information on a blog, even in their own time.

7.4 Remember also that text, music and other content on the internet are copyright works. Workers should not download or e-mail such content to others unless certain that the owner of such works allows this.

8. PERSONAL USE OF SYSTEMS

8.1 The Board permits the incidental use of its internet, e-mail and telephone systems to send personal e-mail, browse the web and make personal telephone calls subject to certain conditions set out below. Our policy on personal use is a privilege and not a right. The policy is dependent upon it not being abused or overused and we reserve the right to withdraw our permission or amend the scope of this policy at any time.

8.2 The following conditions must be met for personal use to continue:

(a) use must be minimal and take place substantially out of normal working hours (that is, during a worker´s usual lunch hour, before 7 am or after 5:15 pm);

(b) use must not interfere with business or office commitments;

(c) use must not commit the Board to any marginal costs; and

(d) use must comply with the Board's policies and procedures.

8.3 Workers should be aware that any personal use of the systems may also be monitored (see paragraph 9) and, where breaches of this policy are found, action may be taken

under the disciplinary procedure (Paragraph 10). The Board reserves the right to restrict or prevent access to certain telephone numbers or internet sites if it considers that personal use is excessive.

9. MONITORING OF USE OF SYSTEMS

9.1 The Board's systems provide the capability to monitor telephone, email voicemail, web and other communications traffic. Monitoring will only be carried out to the extent permitted or required by law and as necessary and justifiable for business purposes.

9.2 The Board reserves the right to monitor and keep records of use of the Board's IT system and email and internet access for a number of reasons relevant to its business including but not limited to:

(a) ensuring compliance with this policy;

(b) training and monitoring standards of service;

(c) ascertaining whether internal or external communications are relevant to the Board's business;

(d) preventing, investigating or detecting unauthorised use of the Board's IT system or criminal activities; and

(e) maintaining the effective operation of the Board's IT system.

9.3 The Board has a legitimate interest in protecting its business reputation and communication systems, limiting its exposure to legal liability and ensuring that workers conduct themselves and perform their work to the level expected of them.

10. INAPPROPRIATE USE OF EQUIPMENT AND SYSTEMS

10.1 Access is granted to the web, telephones and to other electronic systems, for legitimate business purposes only. Incidental personal use is permissible provided it is in full compliance with the Board´s rules, policies and procedures. See paragraph 8 on Personal Use of Systems.

10.2 Misuse or abuse of our telephone or e-mail system or inappropriate use of the internet in breach of this policy will be dealt with in accordance with our disciplinary procedure. Misuse of the internet can, in certain circumstances, constitute a criminal offence. In particular, misuse of the e-mail system or inappropriate use of the internet by viewing, accessing, transmitting or downloading any of the following material, or using any of the following facilities, will amount to gross misconduct (this list is not exhaustive):

(a) pornographic material (that is, writings, pictures, films, video clips of a sexually explicit nature); or

(b) offensive, obscene, or criminal material or material which is liable to cause embarrassment to the Board or to its clients; or

(c) a false and defamatory statement about any person or organisation; or

(d) material which is discriminatory, offensive, derogatory or may cause embarrassment to others; or

(e) confidential information about the Board and any of its staff or clients; or

(f) any other statement which is likely to create any liability (whether criminal or civil, and whether for you or the Board; or

(g) material in breach of copyright; or

(h) online gambling; or

(i) chain letters.

Any such action will be treated very seriously and is likely to result in summary dismissal. Where evidence of misuse is found we may undertake a more detailed investigation in accordance with our disciplinary procedure, involving the examination and disclosure of monitoring records to those nominated to undertake the investigation and any witnesses or managers involved in the disciplinary procedure. If necessary, such information may be handed to the police in connection with a criminal investigation.

11. MONITORING OF POLICY

11.1 This policy reflects the law and the Board's practice as at 1st April 2017. The Chief Executive, in conjunction with the Board, shall be responsible for reviewing this policy from a legislative and operational perspective at least 5 yearly.

11.2 Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting the Chief Executive.

BLACK SLUICE INTERNAL DRAINAGE BOARD

Policy No 17

MEMBERS CODE OF CONDUCT

Review	Audit & Risk Committee on 26th April 2017
Board Approved	
Reviewed	Within 5 years

Part 1

General Provisions

1. INTRODUCTION

1. This Code applies to **you** as a member of an Internal Drainage Board.
2. You should read this Code together with the general principles prescribed by the Board (see Annexure to this Code).
3. It is your responsibility to comply with the provisions of this Code.
4. In this Code "meeting" means any meeting of:
   (a) the Internal Drainage Board;
   (b) any of the Internal Drainage Board's committees or sub-committees, joint committees or joint sub-committees;

   "member" includes an elected, co-opted or appointed member.

2. Scope

1. Subject to sub-paragraphs (2) to (5), you must comply with this Code whenever you:
   (a) conduct the business of your Internal Drainage Board (which, in this Code, includes the business of the office to which you are elected or appointed); or
   (b) act, claim to act or give the impression you are acting as a representative of your Internal Drainage Board, and references to your official capacity are construed accordingly.
2. Subject to sub-paragraphs (3) and (4), this Code does not have effect in relation to your conduct other than where it is in your official capacity.
3. In addition to having effect in relation to conduct in your official capacity, paragraphs 3(2)(c), 3(5) and 3(5a) also have effect, at any other time, where that conduct constitutes a criminal offence for which you have been convicted.
4. Conduct to which this Code applies (whether that is conduct in your official capacity or conduct mentioned in sub-paragraph 3) includes a criminal offence for which you are convicted (including an offence you committed before the date you took office, but for which you are convicted after that date).
5. Where you act as a representative of your Internal Drainage Board:
   (a) on another relevant Internal Drainage Board, you must, when acting for that other Internal Drainage Board, comply with that other Internal Drainage Board's code of conduct; or
   (b) on any other body, you must, when acting for that other body, comply with your Internal Drainage Board's code of conduct, except and insofar as it conflicts with any other lawful obligations to which that other body may be subject.

3. Key Principles of Public Life

The general principles governing your conduct are set out below:

1. **Selflessness**
   Members should serve only the public interest and should never improperly confer an advantage or disadvantage on any person.

2. **Honesty and Integrity**
Members should not place themselves in situations where their honesty and integrity may be questioned, should not behave improperly and should on all occasions avoid the appearance of such behaviour.

3. **Objectivity**
Members should make decisions on merit, including when making appointments, awarding contracts, or recommending individuals for rewards or benefits.

4. **Accountability**
Members should be accountable to the public for their actions and the manner in which they carry out their responsibilities, and should co-operate fully and honestly with any scrutiny appropriate to their particular office.

5. **Openness**
Members should be as open as possible about their actions and those of their Internal Drainage Board, and should be prepared to give reasons for those actions.

6. **Personal Judgement**
Members may take account of the views of others, including their political groups, but should reach their own conclusions on the issues before them and act in accordance with those conclusions.

7. **Respect for Others**
Members should promote equality by not discriminating unlawfully against any person, and by treating people with respect, regardless of their race, age, religion, gender, sexual orientation or disability. They should respect the impartiality and integrity of the Internal Drainage Board's statutory officers, and its other employees.

8. **Duty to Uphold the Law**
Members should uphold the law and, on all occasions, act in accordance with the trust that the public is entitled to place in them.

9. **Stewardship**
Members should do whatever they are able to do to ensure that their authorities use their resources prudently and in accordance with the law.

10. **Leadership**
Members should promote and support these principles by leadership, and by example, and should act in a way that secures or preserves public confidence.

4. General obligations

1. You must treat others with respect.
2. You must not:
   (a) do anything which may cause your Internal Drainage Board to breach any of the equality enactments (as defined in section 33 of the Equality Act 2006(1);
   (b) bully any person;
   (c) intimidate or attempt to intimidate any person who is or is likely to be:
      (i) a complainant,
      (ii) a witness, or
      (iii) involved in the administration of any investigation or proceedings, in relation to an allegation that a member (including yourself) has failed to comply with his or her Internal Drainage Board's code of conduct; or
   (d) do anything which compromises or is likely to compromise the impartiality of those who work for, or on behalf of, your Internal Drainage Board.
   (e) Ask or encourage members or employees of your Internal Drainage Board to act in any way which would conflict with their own Code of Conduct.
3. You must not:
   (a) disclose information given to you in confidence by anyone, or information acquired by you which you believe, or ought reasonably to be aware, is of a confidential nature, except where:
      (i) you have the consent of a person authorised to give it;
      (ii) you are required by law to do so;

(iii) the disclosure is made to a third party for the purpose of obtaining professional advice provided that the third party agrees not to disclose the information to any other person; or

(iv) the disclosure is:

- reasonable and in the public interest; and
- made in good faith and in compliance with the reasonable requirements of the Internal Drainage Board; or

(b) prevent another person from gaining access to information to which that person is entitled by law.

4. You must not conduct yourself in a manner which could reasonably be regarded as bringing your office or Internal Drainage Board into disrepute.

5. You may engage in political activity but should, at all times, remain conscious of your responsibilities as an Internal Drainage Board Member and exercise proper discretion.

6. You:

(a) must not use or attempt to use your position as a member improperly to confer on or secure for yourself or any other person, an advantage or disadvantage; and

(b) must, when using or authorising the use by others of the resources of your Internal Drainage Board:

(i) act in accordance with your Internal Drainage Board's reasonable requirements; and

(ii) ensure that such resources are not used improperly for political purposes (including party political purposes).

5. Use of Public Funds

1. You have a duty to ensure the safeguarding of public funds and the proper custody of assets which have been publicly funded.

2. You must carry out your fiduciary obligations responsibly – that is, take appropriate measures to ensure that the body uses resources efficiently, economically and effectively, avoiding waste and extravagance.

3. **Allowances**

You must comply with the rules set by the Internal Drainage Board regarding remuneration, allowances and expenses. It is your responsibility to ensure compliance with all relevant HM Revenue and Customs requirements concerning payments, including expenses.

4. **Gifts & Hospitality**

(a) You must not accept any gifts or hospitality which might, or might reasonably appear to, compromise your personal judgement or integrity or place you under an improper obligation.

(b) You must never canvass or seek gifts or hospitality.

(c) You must comply with the rules set by the board on the acceptance of gifts and hospitality. You should inform the Chief Executive of any offer of gifts or hospitality and ensure that, where a gift or hospitality is accepted, this is recorded in the register in line the the rules set by the Board.

(d) You are responsible for your decisions on the acceptance of gifts or hospitality and for ensuring that any gifts or hospitality accepted can stand up to public scrutiny and do not bring the public body into disrepute.

5. **Responsibilities**

(a) You should play a full and active role in the work of the Internal Drainage Board. You should fulfil your duties and responsibilities responsibly and, at all times, act in good faith and in the best interests of the Board.

(b) You should deal with the public and their affairs fairly, efficiently, promptly, effectively and sensitively, to the best of your ability. You must not act in a way that unjustifiably favours or discriminates against particular individuals or interests.

(c) You must comply with any statutory or administrative requirements relating to your post.

(d) You should respect the principle of collective decision making and corporate responsibility. This means that, once the Board has made a decision, you should support that decision.

(e) You must not use, or attempt to use, the opportunity of public service to promote your personal interests or those of any connected person, firm, business or other organisation.

(f) You should act in the interest of the board as a whole and not as a representative or delegate of the body by whom you are appointed. You must not use your position as a Board member except for the benefit of the Board.

(g) As a Board Member you have duties and responsibilities analogous to those of directors of companies, who owe a fiduciary duty to the company and must exercise independent judgement.

(h) If a bare majority of the Board, with due cause, consider that you have not acted within this Code of Conduct for Members you should consider resigning as a Member of the Board forthwith.

Part 2

Interests

6. Personal interests

1. You must ensure that no conflict arises, or could reasonably be perceived to arise, between your public duties and your personal interests – financial or otherwise.

2. You must comply with the rules of the Board on handling conflicts of interests set out in paragraphs 10 & 11.

3. You must remove yourself from the discussion or determination of matters in which you have a financial interest. In matters in which you have a non financial interest, you should not participate in the discussion or determination of a matter where the interest might suggest a danger of bias.

4. When considering what non financial interests should be declared, you should ask yourself whether a member of the public, acting reasonably, would consider that the interest in question might influence your words, actions or decisions.

5. It is your responsibility to ensure that you are familiar with the Boards rules on handling conflicts of interests, that you comply with these rules and that your entry in the Boards register of members interests is accurate and up to date.

6. You have a personal interest in any business of your Internal Drainage Board where either:

(a) it relates to or is likely to affect;

(i) anybody of which you are a member or in a position of general control or management and to which you are appointed or nominated by your Internal Drainage Board;

(ii) anybody:

- exercising functions of a public nature;
- directed to charitable purposes; or
- one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union),

of which you are a member or in a position of general control or management;

(iii) any employment or business carried on by you;

(iv) any person or body who employs or has appointed you;

(v) any person or body, other than a relevant Internal Drainage Board, who has made a payment to you in respect of your election or any expenses incurred by you in carrying out your duties;

(vi) any person or body who has a place of business or land in your Internal Drainage Board's area, and in whom you have a beneficial interest in a class of securities of that person or body that exceeds the nominal value of £25,000 or one hundredth of the total issued share capital (whichever is the lower);

(vii) any contract for goods, services or works made between your Internal Drainage Board and you or a firm in which you are a partner, a company of which you are a remunerated director, or a person or body of the description specified in paragraph (vi);

(viii) the interests of any person from whom you have received a gift or hospitality with an estimated value of at least £25;

(ix) any land in your Internal Drainage Board's area in which you have a beneficial interest;

(x) any land where the landlord is your Internal Drainage Board and you are, or a firm in which you are a partner, a company of which you are a remunerated director, or a person or body of the description specified in paragraph (vi) is, the tenant;

(xi) any land in the Internal Drainage Board's area for which you have a licence (alone or jointly with others) to occupy for 28 days or longer; or

(b) a decision in relation to that business might reasonably be regarded as affecting your well-being or financial position or the well-being or financial position of a relevant person to a greater extent than the majority of:

(i) other council tax payers, ratepayers or inhabitants of the electoral division affected by the decision;

7. In sub-paragraph 6 (6b), a relevant person is

(a) a member of your family or any person with whom you have a close association; or

(b) any person or body who employs or has appointed such persons, any firm in which they are a partner, or any company of which they are directors;

(c) any person or body in whom such persons have a beneficial interest in a class of securities exceeding the nominal value of £25,000; or

(d) any body of a type described in sub-paragraph 6(6a)(i) or (ii) above.

7. Disclosure of personal interests

1. Subject to paragraph (6) Personal Interests above, where you have a personal interest in any business of your Internal Drainage Board and you attend a meeting of your Internal Drainage Board at which the business is considered, you must disclose to that meeting the existence and nature of that interest at the commencement of that consideration, or when the interest becomes apparent.
2. Where you have a personal interest in any business of your Internal Drainage Board which relates to or is likely to affect a person described in paragraph 6(6a)(i) or 6(6a)(ii), you need only disclose to the meeting the existence and nature of that interest when you address the meeting on that business.
3. Where you have a personal interest in any business of the Internal Drainage Board of the type mentioned in paragraph 6(6a)(viii), you need not disclose the nature or existence of that interest to the meeting if the interest was registered more than three years before the date of the meeting.
4. Sub-paragraph 1 above only applies where you are aware or ought reasonably to be aware of the existence of the personal interest.
5. Where you have a personal interest but, by virtue of paragraph 9, sensitive information relating to it is not registered in your Internal Drainage Board's register of members' interests, you must indicate to the meeting that you have a personal interest, but need not disclose the sensitive information to the meeting.

8. Prejudicial interest generally

1. Subject to sub-paragraph 2 below, where you have a personal interest in any business of your Internal Drainage Board you also have a prejudicial interest in that business where the interest is one which a member of the public with knowledge of the relevant facts would reasonably regard as so significant that it is likely to prejudice your judgement of the public interest.
2. You do not have a prejudicial interest in any business of the Internal Drainage Board where that business:

(a) does not affect your financial position or the financial position of a person or body described in paragraph 4;

(b) does not relate to the determining of any approval, consent, licence, permission or registration in relation to you or any person or body described in paragraph 4; or

(c) relates to the functions of your Internal Drainage Board in respect of—

(i) an allowance, payment or indemnity given to members;

(ii) any ceremonial honour given to members; and

(iii) setting drainage rates or a special levy under the Land Drainage Act 1991.

9. Effect of prejudicial interests on participation of debate

1. Prejudicial interest shall be treated as set out in the Board's Standing Orders, Order of debate:

'Members must declare where they have an interest in a matter to be discussed, the Chairman then deciding what if any part the member can take in any ensuing discussion and whether the member can vote'

Part 3

Registration of Members' Interests

10. Registration of members' interests

1. Subject to paragraph 6, you must, within 28 days of:

(a) this Code being adopted by or applied to your Internal Drainage Board; or

(b) your election or appointment to office (where that is later),

register in your Internal Drainage Board's register of members' interests details of your personal interests where they fall within a category mentioned in paragraph 6(6)(a), by providing written notification to your Internal Drainage Board's Chief Executive.

2. Subject to paragraph 6, you must, within 28 days of becoming aware of any new personal interest or change to any personal interest registered under paragraph 1 above, register details of that new personal interest or change by providing written notification to your Internal Drainage Board's Chief Executive.

11. Sensitive information

1. Where you consider that the information relating to any of your personal interests is sensitive information, and your Internal Drainage Board's Chief Executive agrees, you need not include that information when registering that interest, or, as the case may be, a change to that interest under paragraph 6.

2. You must, within 28 days of becoming aware of any change of circumstances which means that information excluded under paragraph 1 above, is no longer sensitive information, notify your Internal Drainage Board's Chief Executive asking that the information be included in your Internal Drainage Board's register of members' interests.

3. In this Code, "sensitive information" means information whose availability for inspection by the public creates, or is likely to create, a serious risk that you or a person who lives with you may be subjected to violence or intimidation.

Black Sluice Internal Drainage Board

REGISTER OF MEMBERS' INTERESTS

I.....(full name in block capitals)
A member of the Black Sluice Internal Drainage Board, give notice that I have set out below under the appropriate headings my interests which are required to be declared, and I have put "none" where I have no such interests under any heading.
For Insurance purposes it is a requirement to disclose your date of birth: **DOB: ...../...../.....**

PART ONE – FINANCIAL INTERESTS

1. EMPLOYMENT, BUSINESS TRADE OR PROFESSION

a) Description, job trade or business carried on by me

.....

b) Name of Employer

.....

c) Name of any firm in which I am a partner

.....

d) Name of any company in which I am a remunerated Director

.....

2. SPONSORSHIP
Name of any person or body who has made a payment to me in respect of my election, or any expenses incurred by me in carrying out any duties.

.....

.....

3. INTEREST IN COMPANIES OR SECURITIES
Name of any corporate body with a business or land in the Board's area and in which I have a beneficial interest in a class of securities of that body which exceeds the nominal value of £25,000 or 1/100th of the total issued share capital of that body.

.....

.....

4. CONTRACTS WITH THE BOARD
Description of all contracts for goods or services made with the Board and either myself or an individual or with a company of which I am a director or partner or in which I have an interest as described in 3) above.

.....

.....

5 LAND OR BUILDINGS IN THE BOARD'S AREA

Address or other description (sufficient to identify the location) of any property in which I have a beneficial interest as owner, lessee or tenant in the Board's area.

.....

.....

6 CORPORATE TENANCIES

Address or other description (sufficient to identify the location) of any land where the Board is the landlord and the tenant is a firm which I am a partner, remunerated director or which fall within the description of (3) above

.....

.....

7 LICENCES TO OCCUPY LAND OR BUILDINGS

Address or other description (sufficient to identify the location) of any land, buildings or property in which I have a licence (alone or jointly), a beneficial interest as owner, lessee or tenant in the Board's area.

.....

.....

PART TWO – OTHER INTERESTS

List of any membership of or position of general control of management in any:

i) Body to which I have been appointed or nominated by the Board as its representative:

Name.....

ii) Public Authority or body exercising functions of a public nature:

Name.....

iii) Company, industrial and provident society, charity, or body directed to charitable purposes:

Name.....

iv) Body whose principle purpose include the influence of public opinion or policy:

Name.....

v) Trade Union or professional association:

Name.....

I hereby declare that the above interests are a true and fair record. I am aware that I must within 28 days of becoming aware of any changes to the interests specified in parts one and two above, provide written notification to the Board of that change. I also declare that as a Member of the Black Sluice Internal Drainage Board, I have read, accept and will abide by the Board's Members Code of Conduct.

Signed .....

Dated.....

Black Sluice
Internal Drainage Board

Risk Management Strategy

Risk Management Policy

Risk Analysis

Updated	26th April 2017
Board Approved	
Due for Review	

Contents

Appendices

Risk Management Strategy

1. Purpose, Aims and Objectives

1.1 The purpose of the Boards Risk Management Strategy is to effectively manage potential opportunities and threats to the Board achieving its objectives. See attached Risk Management Policy Statement, Appendix A.

1.2 The Boards Risk Management Strategy has the following aims and objectives;

- Integration of Risk Management into the culture of the Board
- Raising awareness of the need for Risk Management by all those connected with the delivery of services (including partners)
- Enabling the Board to anticipate and respond to changing social, environmental and legislative conditions
- Minimisation of injury, damage, loss and inconvenience to staff, members of the public, service users, assets etc. arising from or connected with the delivery of the Board services
- Introduction of a robust framework and procedures for identification, analysis, assessment and management of risk, and the reporting and recording of events, based on best practice
- Minimisation of the cost of risk

1.3 To achieve these aims and objectives, the following strategy is proposed;

- Establish clear accountabilities, roles and reporting lines for all employees
- Acquire and develop the necessary skills and expertise
- Provide for risk assessment in all decision making processes of the Board
- Develop a resource allocation framework to allocate (target) resources for risk management
- Develop procedures and guidelines for use across the Board
- Develop arrangements to measure performance of Risk Management activities against the aims and objectives
- To make all partners and service providers aware of the Boards' expectations on risk, both generally as set out in its Risk Management Policy and where necessary in particular areas of the Boards' operations.

1.4 The Black Sluice Internal Drainage Board has adopted the following definition of Risk:

'Risk is the threat that an event or action will adversely affect the organisation's ability to achieve its objectives and to successfully execute its strategies'.

2. Accountabilities, Roles and Reporting Lines

2.1 A framework has been implemented that has addressed the following issues:

- The different types of risk – Strategic and Operational
- Where it should be managed
- Roles and accountabilities for all staff.
- The need to drive the policy throughout the Board
- Prompt reporting of accidents, losses, changes etc.

2.2 In many cases, risk management follows existing service management arrangements.

2.3 Strategic risk is best managed by the Board.

2.4 The Board's Chief Executive will be responsible for the Boards overall risk management strategy, and will report directly to the Board.

2.5 The Board's Chief Executive will be responsible for the Boards overall Health and Safety policy and will report to the Board.

2.6 It is envisaged that the development of a risk management strategy will encourage ownership of risk and will allow for easier monitoring and reporting on remedial actions / controls.

3. Skills and Expertise

3.1 Having established roles and responsibilities for risk management, the Board must ensure that it has the skills and expertise necessary. It will achieve this by providing Risk Management Training for Employees and Board Members, where appropriate providing awareness courses that address the individual needs of both the manual workforce and office staff.

3.2 Training will focus on best practice in risk management, and awareness will also focus on specific risks in areas such as the following:

- Partnership working
- Project management
- Operation of Board vehicles and equipment
- Manual labour tasks e.g. Health and Safety issues

4. Embedding Risk Management

Risk management is an important part of the service planning process. This will enable both strategic and operational risk, as well as the accumulation of risks from a number of areas to be properly considered. Over time the Board aims to be able to demonstrate that there is a fully embedded process.

This strategy and the information contained within the appendices provides a framework to be used by all levels of staff and Members in the implementation of risk management as an integral part of good management.

5. Risks and the Decision Making Process

5.1 Risk needs to be addressed at the point at which decisions are being taken. Where Members and Officers are asked to make decisions they should be advised of the risks associated with recommendations being made. The training described in the preceding section will enable this to happen.

5.2 The Board will need to demonstrate that it took reasonable steps to consider the risks involved in a decision.

5.3 There needs to be a balance struck between efficiency of the decision making process and the need to address risk. Risk assessment is seen to be particularly valuable in options appraisal. All significant decision reports to the Board (including new and amended policies and strategies) should include an assessment of risk to demonstrate that risks (both threats and opportunities) have been addressed.

5.4 This process does not guarantee that decisions will always be right but it will demonstrate that the risks have been considered and the evidence will support this.

5. Supporting Innovation and Improvement

6.1 Managers have been made aware that there are a number of tools that can be used to help identify potential risks:

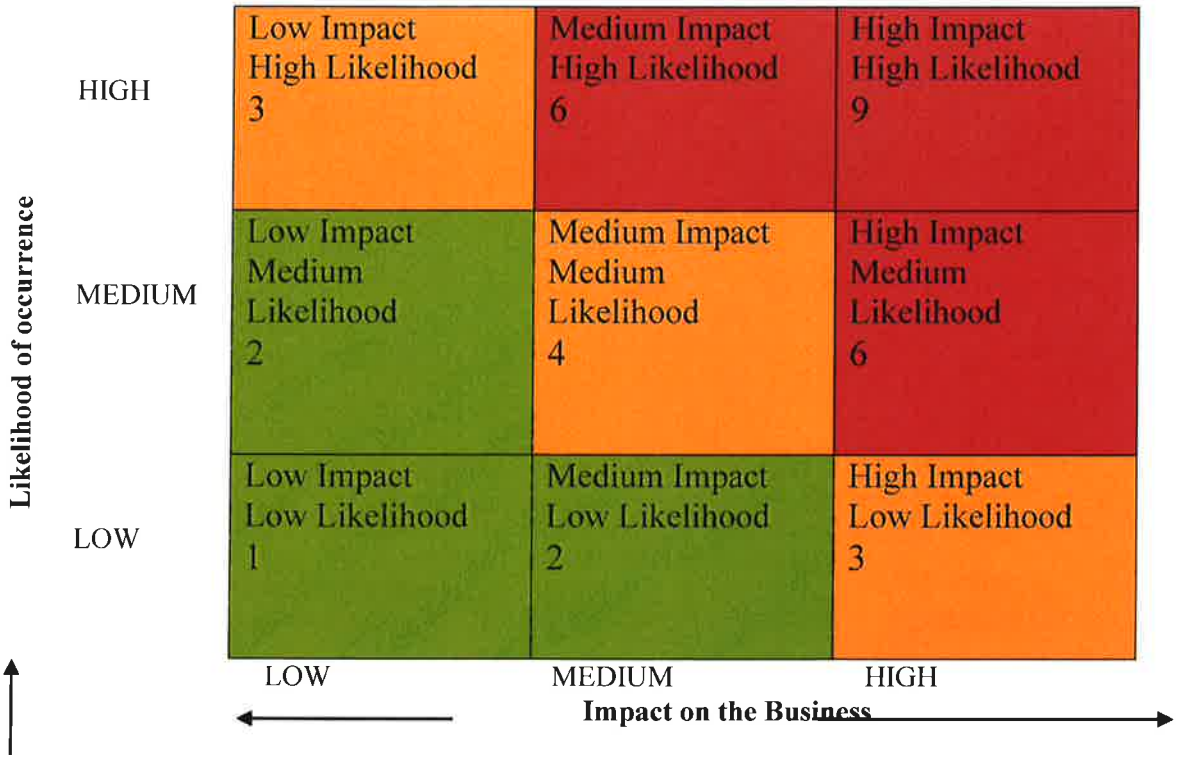
- Workshops.
- Scenario planning.
- Analysing past claims and other losses.
- Analysing past corporate incidents/failures.
- Health & safety inspections.
- Induction training.
- Performance Review & Development interviews.
- Staff and customer feedback.

6.2 Having identified areas of potential risk, they must be analysed by:

- An assessment of impact.
- An assessment of likelihood.

This is to be done by recording the results using the risk matrix below:

RISK ASSESSMENT MATRIX



The high, medium and low categories for impact and likelihood are defined as follows:

IMPACT

- *High* – will have a catastrophic effect on the operation/service delivery. May result in major financial loss (over £100,000). Major service disruption (+ 5 days) or impact on the public. Death of an individual or several people. Complete failure of project or extreme delay (over 2 months). Many individual personal details compromised/revealed. Adverse publicity in national press.

- *Medium* – will have a noticeable effect on the operation/service delivery. May result in significant financial loss (over £25,000). Will cause a degree of disruption (2 – 5 days) or impact on the public. Severe injury to an individual or several people. Adverse effect on project/significant slippage. Some individual personal details compromised/revealed. Adverse publicity in local press.

- *Low* – where the consequences will not be severe and any associated losses and or financial implications will be low (up to £10,000). Negligible effect on service delivery (1 day). Minor injury or discomfort to an individual or several people. Isolated individual personal detail compromised/revealed. NB A number of low incidents may have a significant cumulative effect and require attention.

LIKELIHOOD

High	Very likely to happen	Matrix score 3
Medium	Likely to happen infrequently and difficult to predict	Matrix score 2
Low	Most unlikely to happen	Matrix score 1

7. Risk Control

7.1 Using the risk matrix produces a risk rating score that will enable risks to be prioritised using one or more of the "four T's"

Tolerate	Score <= 2	Accept the risk
Treat	Score 3 to 5	If possible take cost effective in-house actions to reduce the risk.
Transfer	Score 6 to 8	Let someone else take the risk (eg by Insurance or passing responsibility for the risk to a contractor).
Terminate	Score 9	Agree that the risk is too high and do not proceed with the project or activity.

7.2 Risk assessment and risk matrices provide a powerful and easy to use tool for the identification, assessment and control of business risk. It enables managers to consider the whole range of categories of risk affecting a business activity. The technique can assist in the prioritisation of risks and decisions on allocation of resources. Decisions can then be made concerning the adequacy of existing control measures and the need for further action. It can be directed at the business activity as a whole or on individual departments/sections/functions or indeed projects.

8. Supporting Innovation and Improvement

8.1 Risk Management will be incorporated into the business planning process for the Board with a risk assessment of all business aims being undertaken as part of the annual Estimates process.

8.2 The Board's internal auditor will have a role in reviewing the effectiveness of control measures that have been put in place to ensure that risk management measures are working.

Appendix A

RISK MANAGEMENT STRATEGY STATEMENT

The Board believes that risk is a feature of all businesses. Some risks will always exist and can never be eliminated: they therefore need to be appropriately managed.

The Board recognises that it has a responsibility to manage hazards and risks and supports a structured and focused approach to managing them by approval each year of a Risk Management Strategy.

In this way the Board will improve its ability to achieve its strategic objectives and enhance the value of services it provides to the community.

The Boards Risk Management objectives are to:

- Embed risk management into the culture and operations of the Board
- Adopt a systematic approach to risk management as an integral part of service planning and performance management
- Manage risk in accordance with best practice
- Anticipate and respond to changing social, environmental and legislative requirements
- Ensure all employees have clear responsibility for both the ownership and cost of risk and the tools to effectively reduce / control it

These objectives will be achieved by:

- Establishing clear roles, responsibilities and reporting lines within the organisation for risk management
- Incorporating risk management in the Board's decision making and operational management processes
- Reinforcing the importance of effective risk management through training
- Incorporating risk management considerations into Service / Business Planning, Project Management, Partnerships & Procurement Processes
- Monitoring risk management arrangements on a regular basis

The benefits of Risk Management include:

- Safer environment for all
- Improved public relations and reputation for the organisation
- Improved efficiency within the organisation
- Protect employees and others from harm
- Reduction in probability / size of uninsured or uninsurable losses
- Competitive Insurance Premiums (as insurers recognise the Board as being a "low risk")
- Maximise efficient use of available resources.

Appendix B

RISK MANAGEMENT POLICY DOCUMENT

In all types of undertaking, there is the potential for events and consequences that may either be opportunities for benefit or threats to success. Internal Drainage Boards are no different and risk management is increasingly recognised as being central to their strategic management. It is a process whereby Internal Drainage Boards methodically address the risks associated with what they do and the services which they provide. The focus of good risk management is to identify what can go wrong and take steps to avoid this or successfully manage the consequences.

Risk management is not just about financial management; it is about achieving the objectives of the organisation to deliver high quality public services.

The failure to manage risks effectively can be expensive in terms of litigation and reputation, the ability to achieve desired targets, and, eventually, the level of the drainage rates.

Internal Drainage Boards need to keep under review and, if need be, strengthen their own corporate governance arrangements, thereby improving their stewardship of public funds and providing positive and continuing assurance to ratepayers. The Board already looks at risk as part of their day to day activities but there is now a need to look at, adapt, improve where necessary and document existing processes.

The proposal to carry out future capital and maintenance works on the current Environment Agency pumping stations and main rivers within the catchment will introduce increased risks to the Board.

The Board's existing risk management plans and policies will be applied to the works programmes with a special emphasis on Policy No. 41, Public Sector Co-Operation Agreement Policy "The signed agreement must be returned and orders provided prior to the commencement of any works".

Members are ultimately responsible for risk management because risks threaten the achievement of policy objectives. As a minimum, the members should, at least once each year:

a) take steps to identify and update key risks facing the Board;
b) evaluate the potential consequences to the Board if an event identified as a risk takes place; and
c) decide upon appropriate measures to avoid, reduce or control the risk or its consequences.

This Risk Management Policy document is designed to be a living document which will be continually updated when new risks are identified or when existing risks change.

The assessment of potential impact will be classified as high, medium or low. At the same time it will assess how likely a risk is to occur and this will enable the Board to decide which risks it should pay most attention to when considering what measures to take to manage the risks.

After identifying and evaluating risks the responsible officer will need to decide upon appropriate measures to take in order to avoid, reduce or control the risks or their consequence.

RISK ANALYSIS

1. TO PROVIDE AND MAINTAIN STANDARDS OF NEEDS BASED SUSTAINABLE FLOOD PROTECTION

1.1 Risk of Being Unable to Prevent Flooding to Property or land

The Board's main objective is to provide satisfactory water level management within the Board's area.

Flooding could occur in the following ways:

- From failure of coastal defences which are maintained by EA
- From EA Watercourses
- From IDB watercourses
- From riparian watercourses
- From sewers maintained by other authorities
- From surface water

(a) Coastal or Fluvial flooding from failure or overtopping of defences

Consequence: Land and Properties could be subjected to flooding and IDB Pumping Stations could be required to deal with Substantial additional flows

How risk is managed: Board works with lead local flood authority
Pumping Stations Additional Resilience

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
HIGH	LOW	3

(b) Flooding from failure of IDB pumping stations or excess rainfall

Consequence: Land and Properties could be subjected to flooding and IDB Pumping Stations could be required to deal with Substantial additional flows

How risk is managed: Board works with lead local flood authority
PTO gear boxes and generator connections.

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
HIGH	LOW	3

(c) Flooding from Sewers or riparian watercourses

Consequence: Small areas of land and maybe some properties could be subjected to flooding

How risk is managed: Board works with lead local flood authority

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

1.2 Risk of Loss of Electrical Supply

The Board relies on electrical power for all pumping stations. Loss of supply could be encountered for a number of reasons in the future.

Consequence: Pumping stations would fail to operate

Office and Depot would be unable to function

Telemetry system fails to operate

How risk is managed: Dual drive gearboxes installed at pumping stations to enable pumps to be operated by a tractor

Large pumping stations have generator connections but the Board would have to hire in generators which may be in short supply

UPS system fitted to telemetry computer and Main server

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
HIGH	LOW	3

1.3 Risk of Pumps failing to operate

Consequence: High water levels and possible flooding

Extra expenditure on pumping station maintenance

How risk is managed: Pumping engineer checks at regular intervals

Refurbishment of plant has been carried out

Continued investment planned for pumping stations over next Ten years

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
HIGH	LOW	3

1.4 Risk of Watercourses being unable to convey water

Consequence:	High water levels and possible flooding
	Extra expenditure on drain maintenance
How risk is managed:	Asset conditions are shown on a database
	All watercourses are cleared of weed growth once each year
	All watercourses are desilted on a regular basis
	Board regularly check and clear out culverts
Further work:	Continue to review asset conditions in asset database

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	**LOW**	**2**

1.5 Risk of Operating machinery to maintain watercourses

The Board operates excavators and tractor mounted machines to remove weed growth and silt from watercourses. There are risks in operating this machinery.

Risk:	Hitting overhead electrical services
	Hitting underground electrical services
	Machines falling into watercourse
	Parts of machine hitting people or other vehicles
Consequence:	Damage to Third parties
	Damage to vehicles
	Injury to staff
How risk is managed:	Machinery is regularly serviced
	Machinery is checked twice each year by a qualified engineer
	Health and Safety Policy, reported annually to the Board
	Health and Safety Consultant employed
	All drivers are suitably trained
	All drivers are provided with the required safety equipment
	All machinery is insured by the Board

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	**LOW**	**4**

1.6 Risk of Claims from Third Parties for damage to property or injury

Risk:	The Board could cause damage to property or injury due to their actions Hitting overhead/underground electrical services Machines falling into watercourses
Consequence:	Damage to Third parties Damage to vehicles Injury to staff Loss of income Extra work for staff
How risk is managed:	The Board has adequate insurance The Board train staff to undertake works safely Risk assessments are carried out

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	**MEDIUM**	**4**

1.7 Risk of Loss of Senior Staff

Consequence:	Inability to operate efficiently
How risk is managed:	Hire in temporary staff from Agencies or other local Drainage Boards Formalised arrangements to share staff from other drainage boards

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	**LOW**	**2**

1.8 Insufficient Finance to Carry Out Works

Consequence: Watercourses not maintained in satisfactory condition
Pumping Stations more at risk of failure
Increased risk of poor drainage and flooding

How risk is managed: Ten year budget to ensure adequate funding

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

1.9 Reduction in Staff Performance

Consequence: Reduced standards of maintenance

How risk is managed: Appraisal system
Management systems

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

1.10 Insufficient Staff Resources

Consequence: Reduced standards of maintenance
Reduced value for money

How risk is managed: Review by senior management
Reports to Executive Committee

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

2. TO CONSERVE AND ENHANCE THE ENVIRONMENT WHEREVER PRACTICAL AND POSSIBLE TO ENSURE THERE IS NO NET LOSS OF BIODIVERSITY

2.1 Risk of Prosecution for not Adhering to Environmental Legislation

The Board have responsibilities to promote nature conservation and the environment

Consequence: Prosecution for damage to habitat

Injury or death of fish, birds or mammals

How risk is managed: Board employs an environmental consultant for reports and advice

Workforce are trained in environmental matters

Working within the restraints of the Board's Biodiversity Action Plan

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

2.2 Non Delivery of Objectives

Consequence: Biodiversity Action Plan not complied with

How risk is managed: Projects included in capital plan

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
LOW	MEDIUM	2

3. TO PROVIDE A 24 HOUR/365 DAY EMERGENCY RESPONSE FOR THE COMMUNITY

3.1 Emergency Plan Inadequate or not up to date

Consequence: Difficulties in emergency situation

How risk is managed: Regular review of plan

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
LOW	LOW	1

3.2 Insufficient Resources

Consequence: Inability to provide adequate response

How risk is managed: Shared resources with neighbouring Boards

Use local farmer/landowner resources

Review resources available

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

3.3 Risk of Critical Incident Loss of Office

Consequence: Risk of an incident preventing the use of anything at the offices

How risk is managed: Insurance for Additional Cost of Working

Look into establishing alternative arrangements

Possibility of Witham Fourth Offices

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
HIGH	LOW	3

4. TO PROVIDE A SAFE AND FULFILLING WORKING ENVIRONMENT FOR STAFF

4.1 Risk of Injury to Staff and Subsequent Claims and Losses

Consequence:
- Injury to staff
- Claims for losses
- Senior staff liable under Corporate Manslaughter Legislation

How risk is managed:
- Health and Safety Policy, reported annually to the Board
- Health and Safety Consultant employed
- Staff are trained for the duties that they are required to perform
- Risk assessments are carried out for all activities
- The Board has suitable insurance cover against all risks

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	**LOW**	**2**

4.2 Risk of not complying with Health & Safety Legislation

If Health & Safety legislation is not complied with there is a risk of work being stopped and officers being prosecuted.

Consequence:
- Fines and serious delays in work programme

How risk is managed:
- A health and safety consultant is employed to advise on policy, monitor legislation and to check Health & Safety risk assessments
- Board Health & Safety policy is developed under their guidance
- Regular training of all staff

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
HIGH	**LOW**	**3**

5. TO MAINTAIN FINANCIAL RECORDS THAT ARE CORRECT AND COMPLY WITH ALL RECOMMENDED ACCOUNTING PRACTICE

5.1 Risk of Loss of Cash

Very little cash collected at office

Consequence: Loss of income

How risk is managed: Money placed in safe and banked as soon as possible

The Board has adequate insurance
A maximum of £500 petty cash is held

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
LOW	LOW	1

5.2 Risk of Loss of Money invested in Building Societies & Banks

Consequence: Loss of income

How risk is managed: Money is placed with known Building Societies and banks on the FCA Register

A maximum of £300,000 is invested in each organisation as per the Investment Policy

The Executive Committee of the Board reviews the investments on a regular basis

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

5.3 Risk of Fraud by Senior Officers

Consequence: Loss of money

How risk is managed: Two Officers always have to sign each mandate for a transaction

All purchase ledger transactions are reviewed by the Board

The Board has adequate insurance

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
LOW	LOW	1

5.4 Risk of Inadequacy of Internal Checks

Consequence: Risk of incorrect payments being made

How risk is managed: All items resulting in payments being made by the Board are checked before being processed

All Payments made through the Board's Bank Accounts are authorised by two authorised signatories as per the Financial Regulations

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	**LOW**	**2**

6. TO ENSURE THAT ALL ACTIONS TAKEN BY THE BOARD COMPLY WITH ALL CURRENT UK AND EU LEGISLATION

5.1 Risks to Board Members

There are 21 Board Members who make decisions on the operation of the Board

Risk: Board Members make decisions that involve the Board in extra expense

Consequence: Liability of Board Members

How risk is managed: The Board has adequate insurance

Qualified and experienced staff advise the Board

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
LOW	**LOW**	**1**

6.2 Risk of not complying with all Employment Regulations and Laws

There is a risk that the Board may not comply with all regulations and laws.

Consequence: Claims against the Board

How risk is managed: Insurance

Advice from consultants and solicitors and the industry

Finance Manager has regular training in employment law

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	**LOW**	**2**

7. A COST EFFICIENT IDB THAT PROVIDES VALUE FOR MONEY SERVICE

7.1 Risk of Collecting insufficient Income to Fund Expenditure

Consequence: Inability to pay staff and creditors

Inability to maintain drains and pumping stations in a satisfactory condition

How risk is managed: Monthly finance reports sent to Members of Executive Committee

Reports to Board Meetings

Cash flow forecasting by Finance Manager

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
LOW	**LOW**	**1**

7.2 IDB abolished or taken over

Consequence: Loss of direction from local members

How risk is managed: Association of Drainage Authorities lobbies on behalf of IDB's

Regular dialogue with local MP's

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
LOW	**LOW**	**1**

8. INFORMATION TECHNOLOGY & COMMUNICATIONS

8.1 Risk of Loss of Telemetry

Consequence: If the telemetry fails then it will be more difficult to manage the pumping stations

How risk is managed:
- Continual review of hardware and software
- Back up computers
- Pump Engineer's experience
- Workmen already assigned to pumping stations can be sent to check on conditions
- High Capacity UPS (Battery Backup) in place in case of power cut

Further Work: Continue to maintain trained staff to monitor telemetry

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	**LOW**	**2**

8.2 Risk of Loss of Telephone Communications

Consequence: Inability to communicate decisions

How risk is managed:
- All staff have mobile telephones
- 16 VOIP & 3 Analog lines on site
- UPS (Battery Backup) on Communications Cabinet

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
LOW	**LOW**	**1**

8.3 Risk of Loss of Internet Connections

Consequence: Unable to remotely connect to office and Telemetry resulting in Employee having to be on site in an event

Unable to make bank payments

Unable to access information on internet

How risk is managed: Two Fibre Broadband internet lines into office

Mobile Wifi Broadband

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

8.4 Risk of Network Failure

Consequence: All computers and information inaccessible

How risk is managed: Proactive IT Maintenance Contract with external consultants

4 hour response for server or Network failure

Staff with limited training and remote support

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
HIGH	LOW	3

8.5 Risk of Breech in Cyber Security

Consequence:	All computers and information inaccessible Risk of Data Protection Breach Security of Information (Keylogger)
How risk is managed:	Proactive IT Maintenance Contract with external consultants 4 hour response for server or Network failure Staff with limited training and remote support
Further Work	Staff Training Unified Threat Management system installed and subscription maintained All information taken off site digitally is encrypted and password protected Introduction of Electronic Information and Communication Systems Policy (was part of the 'White Book' previously)

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	**MEDIUM**	**4**

8.6 Risk of Network Security Breech

Consequence:	Unauthorised access to the Network and information stored on the network
How risk is managed:	Unified Threat Management installed and subscription maintained Review of Network Security by IT consultants carried out

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	**LOW**	**2**

8.7 Risk of Virus being introduced to Network

Consequence:	Malicious damage to hardware and information by various types of virus
How risk is managed:	Sophos Antivirus installed on all servers and desktop computers and managed centrally
	Hard Firewall installed to prevent unauthorised person introducing virus
	Emails filtered off site by Message Defence and by UTM to reduce likelihood of malicious attachments

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	**LOW**	**2**

8.8 Risk of Loss of Accounting Records

All of the Board's records are retained on the main server in the communications room

Consequence:	Inability to pay staff
	Inability to pay creditors
	Difficulty in finalising accounts
How risk is managed:	Records backed up each day
	Insurance for loss of business
	Computer systems are regularly reviewed by trained staff and external IT consultants
	Volume Shadow software copies back up every six hours
	Encrypted Back up tape is taken off site out of office hours
Further work:	Cloud backups being investigated.

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	**LOW**	**2**

8.9 Risk of Loss of Rating Records

All of the Board's records are retained on the main server in the communications room

Consequence:	Inability to check who has paid rates
	Loss of income
	Loss of records of occupiers of land
How risk is managed:	Records backed up each day
	Insurance for loss of business
	Volume Shadow software copies back up every six hours
	Computer systems are regularly reviewed by trained staff and by external IT consultants
	Encrypted Back up tape is taken off site out of office hours
Further work:	Cloud backups being investigated.

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	**LOW**	**2**

BLACK SLUICE INTERNAL DRAINAGE BOARD

AUDIT & RISK COMMITTEE MEETING - 26th APRIL 2017

AGENDA ITEM No 7(b)(ii)

OPERATING BOARDS MACHINERY

1. Introduction

The Board's Risk Register now identifies the risk in operating Boards machinery as an Amber with a score of 4. In 2016 there were 2 accidents involving Boards machinery. The first involving the recovery of a wheeled flailmowing machine. The second involving a tracked excavator. Both machines overturned into the watercourse. The operator of the excavator sustaining injuries, requiring time off work. Both machines were successfully recovered. The extent of the accident damage to the wheeled machine resulting in an insurance claim for repair. The damage to the excavator once recovered, was repaired 'in house' by the Board following an inspection by an engineer from the machine suppliers. Following this the daily procedure for operating Boards machinery was reviewed.

2. Risks

There are 4 main risk types:

i) Site conditions
ii) Maintenance
iii) Site Hazards
iv) Training
v) Operator error

2.1 Site Conditions

From the last operation of the machine on site, conditions can change adversely affecting the operation of the machine. Such conditions usually relate to change in weather, rain, snow, ice, fog and reduced visibility.

2.2 Maintenance

Failure of any part of the machine due to incorrect maintenance and daily walk round checks

2.3 Site Hazards

These can range from overhead or underground electric/BT cables, other underground utilities and also pipe duct crossings within the machines working area

2.4 Training

A requirement to operate machinery correctly and safely.

2.5 Operator Error

This is something that can happen to the most experienced operators. This was the cause of the accident with the Board's excavator over turning into the watercourse.

3. Current Risk Management

The daily procedure for operating Boards machinery, was recapped in a toolbox talk delivered to all machine operators.

i) Daily walk round check of machine prior to commencement of work, identify and report all faults.
ii) Routine daily maintenance check, identify and report all faults
iii) Site conditions, have they changed since machine last operated overnight, weekend or 3-day period if 9-day weekend. Rain, snow, ice, visibility etc.
iv) Are you a new operator on the machine since the last shift?
v) Has it been parked correctly and securely?
vi) Do you know if the machine is safe to move?
vii) While travelling the machine to the working site always allow a sufficient margin from any hazard. If it is close proximity to a drain bank top do not travel directly on top of the bank. If ground conditions are wet or icy an increased safe working distance from the drain bank top will be required.
viii) While operating Board Plant constantly check the position of the machine in relation to the top of bank. During flailmowing operations, the machine can become too close to the top of the bank, ground conditions will increase the risk of this, as is the case with operations of tracked machinery.
ix) During Board Plant Operations Your full concentration is important at all times. Paying attention to your surroundings, and being aware of any hazards, following the safe systems of work provided to you to enable operations in and around these hazards.
x) Make sure that you are always looking in the direction in which you are travelling. Do not be distracted by looking at plans, maps, mobile phone or any other source of distraction that prevents you from looking in your direction of travel. To do so, no matter how slowly the machinery you are operating is travelling, you are putting yourself in danger and anyone in or around the working area of the machine you are operating.
xi) If it is a requirement to look at something else other than the direction of travel. Stop and switch off the machine, apply the parking brake, only when you have completed this task should you recommence operation of the machine.

If whilst operating Board Plant, there is anything that you are unsure of contact your Supervisor.

4. Future Options

Following discussions with Irelands Farm Machinery, the agents for the Twiga SPV 2, about recognised training for these machines. Spearhead, the UK Franchisee, are able to offer the provision of newly developed bespoke training for all operators of these flailmowing machines, by an accredited Llantra trainer. Initial training day organised for 4 operatives on 03/05/17 at an estimated cost of £400.00 per person.

Training for existing workforce operatives, to gain experience and training required to operate 360 excavators. Costs and availability of suitable courses to be investigated

5. Conclusion and recommendations

Operation of Boards machinery is constantly being reviewed to achieve best practice and promote the Boards Safe Systems of Work.

Only operators that are trained, confident and competent should and do operate any machinery.

Approved training is now available for all Boards machinery, and it is recommended that refresher training is carried out according to the specifics for each piece of machinery operated.

P N Nicholson
Operations Manager

BLACK SLUICE INTERNAL DRAINAGE BOARD

AUDIT & RISK COMMITTEE MEETING - 26th APRIL 2017

AGENDA ITEM No 7(b)(ii)

CYBER SECURITY

1. Introduction

The Board's Risk Register identifies the risk of a breach in Cyber security as an Amber with a score of 4 and as such it is regularly reviewed. In March 2015 the Board's server was discovered to be infected by a Crptolocker virus which was encrypting all the data on the Server. This was discovered early and the spread of the virus limited until the virus could be halted and removed from the system by our IT consultants. Following this the system security was reviewed and a more comprehensive "United Threat Management" system was installed. Due to the backup regime and early discovery no work was lost only the limited time restoring the data to the server.

2. Risks

There are 4 main types of risk in relation to Cyber security although these break down into many parts with some shown at the annex to this report;

i) Data Breach
ii) Viruses
iii) Hacking
iv) Employee Error

2.1 Data Breach

As a public body we are subject to mandatory registration with the Information Commissioners Officers (ICO) and whilst Data Protection is important for all organisations public bodies have increased responsibilities.

2.2 Viruses

Viruses can be downloaded on to the Board's network in a variety of ways but the majority of them will be identified and quarantined by either the Anti-virus software or the Unified Threat Management System using on-access scanning. This does slow the system down but it has been considered that when looking at striking a balance between speed and safety we are about where we should be. It is still possible that an employee could download a virus disguised at a file and override the UTM.

2.3 Hacking

You may think "who would want to hack into a Drainage Board?" but unfortunately some hackers will hack in to organisations just to show that they can. Once they are in to the system they can also have more malicious intentions such as stealing data or installing key loggers on to computers and stealing bank details as examples.

2.4 Employee Error

This is the most common risk in relation to Cyber Security with even the most savvy of computer users being caught out.

This was the cause of the Crypto Locker infestation in March 2015 when an employee opened what they thought was an application for a position that we were advertising at the time. Whilst this is an example of how it could be sent as an email attachment it could also be a spurious website or a link in an email that when you click the link it installs something in the back ground and you may not be aware of it until it is too late.

3. Current Risk Management

This isn't the first time this subject is being considered and we have a number of procedures and safe guards in place to try and minimise the risk.

i) We have a Proactive Maintenance Contract with HBP Systems Ltd which includes;
   (a) Premium quality support from a Microsoft Gold Partner
   (b) 1 hour guaranteed response on all calls
   (c) 8 hour fix target time on all calls
   (d) All system critical calls actioned within 15 minutes and escalated to a director
   (e) Unlimited phone, email, remote and on-site support
   (f) Loan equipment and unlimited parts provided where required
   (g) Proactive support services to cover maintenance, repairs and updates
   (h) 24/7 remote monitoring to identify issues early
   (i) Dedicated client account manager to help plan your IT strategy
   (j) Half day per Quarter Proactive essential maintenance

ii) Sophos Unified Threat management system;
   (a) Network Protection – including Hard Firewall
   (b) Web Protection
   (c) Email Protection – No longer used as changed to Office 365
   (d) Wireless Protection
   (e) Virtual Private Network for working away from office

iii) Sophos Antivirus client installed on every machine and monitored centrally

iv) Message Defence subscription filters emails off site for Spam which could contain spurious links and attachments

v) Daily backup regime that includes the disk being taken offsite out of office hours.

vi) All information removed from Office has 128 bit encryption

vii) Electronic Information and Communications System Policy

viii) Staff with limited external training

ix) Regular updates from HBP Systems promulgated to all users.

4. Future Options

4.1 Intercept X, Sandstorm and advanced anti-virus proposal

HBP Systems Ltd have produced a proposal that would include a number of different elements;

i) changing our premise based Sophos antivirus to the cloud version with an upgrade to the advanced subscription. This would provide a more advanced and easily managed Anti-virus to all our computers and servers.

ii) Intercept X – Sophos Intercept X is designed to stop attackers before they have a chance to throw their first punch. Rather than examining hundreds of millions of known malware samples, Intercept instead focuses on the relatively small collection of techniques used to spread malware. Sophos Intercept X features CryptoGuard, which prevents the malicious spontaneous encryption of data by ransomware—even trusted files or processes that have been hijacked. And once ransomware gets intercepted, CryptoGuard reverts your files back to their safe states.

iii) Subscribe to Sandstorm on the Sophos UTM - Sophos Sandstorm is an Advanced Persistent Threat and zero-day malware defence solution that complements the Sophos UTM. Sophos Sandstorm blocks evasive threats like ransomware, disguised as executables, PDFs, and Microsoft Office documents sending them to a cloud-sandbox to be detonated and observed in a safe environment. Threat intelligence is fed into the base Sophos solution and the file blocked or permitted. The process takes just a couple of minutes with minimal impact for the user. And Sophos Sandstorm gives you detailed threat reports for every incident so you know exactly what's going on.

This upgrade and additional layers of defence, as you would expect, do not come cheap. The initial purchase, installation and subscription would be **£7074** which would include a 3 year subscription to Sophos Antivirus Advanced, Intercept X and Sandstorm. This would be funded from the IT budget at **£2358** per year. The current Sophos Antivirus cost £1770 for 3 years, £590 pa.

4.2 Insurance

As part of our Risk Management Strategy the option of "Let someone else take the risk" (e.g. By insurance or passing the responsibility for the risk to a contractor) is identified and as such we have requested quotations of our current insurance Broker as detailed below.

Cyber Policy

Limit of Indemnity: £1,000,000 any one claim and in the aggregate in any one period of insurance

Policy Deductible: £1,000 each and every claim

Including:

- Cyber Covers
- Data Liability, including Regulatory Liability in respect of breach of Privacy Legislation
- Your own Network Security

- Remediation Costs incl own Network Restitution following breach, and extortion costs
- Business Interruption
- Automatically including your External Services and Operators noted in the wording

Premium Quoted **£1830.68** inclusive of premium tax

Crime Policy

Limit of Indemnity: £500,000 any one claim and in the aggregate in any one period of insurance

Policy Excess: £7,500 every claim, except first claim in any one period where the excess is only £1,000.

Including:

- Identity Fraud
- Mitigation Costs
- Telecommunications Fraud
- Money and Securities

Premium Quoted **£1512.50** inclusive of insurance tax.

4.3 Staff Training

Given that the greatest vulnerability in Cyber Security is the human element a continuous process of staff training needs to be developed and whilst regular updates and reminders are useful a structure training course should have a greater impact.

HBP Systems Ltd have offered to attend the offices to deliver a day course at a cost of £1300 and they are in the process of developing a course.

Other options include

- Local Colleges
- Lincolnshire Chamber of Commerce that offer Jargon-free sessions
- In house training sessions.

5. Conclusions and Recommendations

Cyber Security is a subject that is ever evolving and is not going to go away. The current systems that the Board has in place are constantly reviewed and this report is part of that process.

The greatest vulnerability to the Board's IT infrastructure is the human error element in downloading/introducing a malicious file that could either disrupt our systems by encrypting data or worse stealing personal and commercially sensitive data.

I recommend a two phased approach in implementing options 1 and 3. Option one would minimise the opportunity to download the malicious files and option 3 would make everyone aware of the potential vulnerabilities and assist in identifying files that may get through the net.

For option 2 to be a credible solution I believe we would have to prove that we have done everything we can to mitigate the risk anyhow so we may as well just do it?

1. Trojan. Trojan is one of the most complicated threats among all. Most of the popular banking threats come from the Trojan family such as Zeus and SpyEye. It has the ability to hide itself from antivirus detection and steal important banking data to compromise your bank account. If the Trojan is really powerful, it can take over your entire security system as well. As a result, a Trojan can cause many types of damage starting from your own computer to your online account.

2. Virus. Looking at the technology 10 years back, Virus is something really popular. It is a malicious program where it replicates itself and aim to only destroy a computer. The ultimate goal of a virus is to ensure that the victim's computer will never be able to operate properly or even at all. It is not so popular today because Malware today is designed to earn money over destruction. As a result, Virus is only available for people who want to use it for some sort of revenge purpose.

3. Worms. One of the most harmless threats where it is program designed only to spread. It does not alter your system to cause you to have a nightmare with your computer, but it can spread from one computer to another computer within a network or even the internet. The computer security risk here is, it will use up your computer hard disk space due to the replication and took up most of your bandwidth due to the spread.

4. Spyware. Is a Malware which is designed to spy on the victim's computer. If you are infected with it, probably your daily activity or certain activity will be spied by the spyware and it will find itself a way to contact the host of this malware. Mostly, the use of this spyware is to know what your daily activity is so that the attacker can make use of your information. Such as if you browse on sex toys for a week every day, the attacker will try to come out with a sex toy scam to cheat on your money.

5. Scareware. Scareware is something that plant into your system and immediately inform you that you have hundreds of infections which you don't have. The idea here is to trick you into purchasing a bogus anti-malware where it claims to remove those threats. It is all about cheating your money but the approach is a little different here because it scares you so that you will buy.

6. Keylogger. Something that keeps a record of every keystroke you made on your keyboard. Keylogger is a very powerful threat to steal people's login credential such as username and password. It is also usually a sub-function of a powerful Trojan.

7. Adware. Is a form of threat where your computer will start popping out a lot of advertisement. It can be from non-adult materials to adult materials because any ads will make the host some money. It is not really harmful threat but can be pretty annoying.

8. Backdoor. Backdoor is not really a Malware, but it is a form of method where once a system is vulnerable to this method, attacker will be able to bypass all the regular authentication service. It is usually installed before any virus or Trojan infection because having a backdoor installed will ease the transfer effort of those threats.

9. Wabbits. Is another a self-replicating threat but it does not work like a Virus or Worms. It does not harm your system like a Virus and it does not replicate via your LAN network like a Worms. An example of Wabbit's attack is the fork bomb, a form of DDoS attack.

10. Exploit. Exploit is a form of software which is programmed specifically to attack certain vulnerability. For instance, if your web browser is vulnerable to some out-dated vulnerable flash plugin, an exploit will work only on your web browser and plugin.

The way to avoid hitting into exploit is to always patch your stuff because software patches are there to fix vulnerabilities.

11. Botnet. Botnet is something which is installed by a BotMaster to take control of all the computer bots via the Botnet infection. It mostly infects through drive-by downloads or even Trojan infection. The result of this threat is the victim's computer, which is the bot will be used for a large scale attack like DDoS.

12. Dialer. This threat is no longer popular today but looking at the technology 10 years back or more where we still access the internet using a dial-up modem, it is quite a popular threat. What it does is it will make use of your internet modem to dial international numbers which are pretty costly. Today, this type of threat is more popular on Android because it can make use of the phone call to send SMS to premium numbers.

13. Dropper. Looking at the name, a Dropper is designed to drop into a computer and install something useful to the attacker such as Malware or Backdoor. There are two types of Dropper where one is to immediately drop and install to avoid Antivirus detection. Another type of Dropper is it will only drop a small file where this small file will auto trigger a download process to download the Malware.

14. Fake AV. Fake Antivirus threat is a very popular threat among Mac user about 10 months ago. Due to the reason that Mac user seldom faces a virus infection, scaring them with message which tells them that their computer is infected with virus is pretty useful where it results them into purchasing a bogus antivirus which does nothing.

15. Phishing. A fake website which is designed to look almost like the actual website is a form of phishing attack. The idea of this attack is to trick the user into entering their username and password into the fake login form which serves the purpose of stealing the identity of the victim. Every form sent out from the phishing site will not go to the actual server, but the attacker controlled server.

16. Cookies. Cookies is not really a Malware. It is just something used by most websites to store something into your computer. It is here because it has the ability to store things into your computer and track your activities within the site. If you really don't like the existence of cookies, you can choose to reject using cookies for some of the sites which you do not know.

17. Bluesnarfing. Bluesnarfing is all about having an unauthorized access to a specific mobile phones, laptop, or PDA via Bluetooth connection. By having such unauthorized access, personal stuff such as photos, calender, contacts and SMS will all be revealed and probably even stolen.

18. Bluejacking. Bluejacking is also uses the Bluetooth technology but it is not as serious as Bluesnarfing. What it does is it will connect to your Bluetooth device and send some message to another Bluetooth device. It is not something damaging to your privacy or device system compared to the Bluesnarfing threat.

19. DDoS. One of the most famous thing done by Anonymous, which is to send millions of traffic to a single server to cause the system to down with certain security feature disable so that they can do their data stealing. This kind of trick which is to send a lot of traffic to a machine is known as Distributed Denial of Service, also known as DDoS.

20. Boot Sector Virus. It is a virus that places its own codes into computer DOS boot sector or also known as the Master Boot Record. It will only start if there it is injected during the boot up period where the damage is high but difficult to infect. All the victim need to do if they realize there is a boot sector virus is to remove all the bootable drive so that this particular virus will not be able to boot.

21. Browser Hijackers. A browser hijacker uses the Trojan Malware to take control of the victim's web browsing session. It is extremely dangerous especially when the victim is trying to send some money via online banking because that is the best time for the hijacker to alter the destination of the bank account and even amount.

22. Chain Letters. When I was small, I got tricked with chain letters written by my friend. But chain letters does not stop at that era. It brings to adult life as well where people like to send chain letter such as Facebook account delete letter. It usually says if you don't forward that particular message or email to 20 people or more, your account will be deleted and people really believe that.

23. Virus Document. Virus today can be spread through document file as well especially PDF documents. Last time, people will only advice you not to simply execute an EXE file but in today's world with today's technology, document file should also be avoided. It is best if you use an online virus scanner to scan first before opening any single file which you feel it is suspicious.

24. Mousetrapping. I am not too sure whether you had encountered a Mousetrapping Malware before where what it does is it will trap your web browser to a particular website only. If you try to type another website, it will automatically redirect you back. If you try clicking forward/backward of the navigation button, it will also redirect you back. If you try to close your browser and re-open it, it will set the homepage to that website and you can never get out of this threat unless you remove it.

25. Obfuscated Spam. To be really honest, obfuscated Spam is a spam mail. It is obfuscated in the way that it does not look like any spamming message so that it can trick the potential victim into clicking it. Spam mail today looks very genuine and if you are not careful, you might just fall for what they are offering.

26. Pharming. Pharming works more or less like phishing but it is a little tricky here. There are two types of pharming where one of it is DNS poisoning where your DNS is being compromised and all your traffic will be redirected to the attacker's DNS. The other type of pharming is to edit your HOST file where even if you typed www.google.com on your web browser, it will still redirect you to another site. One thing similar is that both are equally dangerous.

27. Crimeware. Crimeware is a form of Malware where it takes control of your computer to commit a computer crime. Instead of the hacker himself committing the crime, it plants a Trojan or whatever the Malware is called to order you to commit a crime instead. This will make the hacker himself clean from whatever crime that he had done.

28. SQL Injection. SQL injection does not infect the end users directly. It is more towards infecting a website which is vulnerable to this attack. What it does is it will gain unauthorized access to the database and the attacker can retrieve all the valuable information stored in the database.

Black Sluice Internal Drainage Board

Policy No: 10

Delegation of Authority Policy

Review Dates:

Reviewed	Audit & Risk Committee 26th April 2017
Board Approved	

DELEGATION OF AUTHORITY TO COMMITTEES

Executive Committee

1. Approve salary levels for members of staff.
2. Recruitment of Senior Officers.
3. Set levels of rents for Board's property and land.
4. Approve awards of large contracts following tender or quotation submission.
5. Approve orders for plant expenditure in excess of £10,000 within annual budget estimate.
6. Approve any changes to the investment portfolio of the Bourne Fen Farm Account.
7. Any formal consent which requires determination before the next Board Meeting which officers cannot approve.
8. Approve any item of expenditure up to a value of £25,000.

Minutes of all actions taken by the Executive Committee should be presented to the following meeting of the Board

Works Committees

1. Any formal consent which requires determination before the next Board Meeting which officers cannot approve.
2. Approve any individual works or scheme up to a value of £25,000.

Minutes of all actions taken by the Works Committees should be presented to the following meeting of the Board.

Bridges & Culverts Committee

1. Determine applications for the renewal of Bridges and Culverts and the level of any contribution required from the ratepayer

Minutes of all actions taken by the Bridges & Culverts Committee should be presented to the following meeting of the Board.

Environment Committee

1. Approve expenditure of the Environmental budgets to the level set in the annual budgets.

Minutes of all actions taken by the Environment Committee should be presented to the following meeting of the Board.

Audit & Risk Committee

1. To investigate any activity within its responsibilities
2. To seek any information that it requires from any Officer or employee of the Board and all employees are directed to cooperate with any request made by the Committee
3. To obtain outside legal or independent professional advice, and secure the attendance of outsiders with relevant experience and expertise if it consider this necessary

Minutes of all actions taken by the Audit & Risk Committee should be presented to the following meeting of the Board.

Nominations Committee

1. Prepare nominations for approval of the Board in the Board meeting following an election and any vacancies mid-term.

Minutes of all actions taken by the Nominations Committee should be presented to the following meeting of the Board.

DELEGATION OF AUTHORITY TO BOARD MEMBERS AND OFFICERS

Chairman of the Board

1. Sign agreements on behalf of the Board.
2. Negotiate purchases and sales on behalf of the Board.
3. Approve expenditure and arrangements for inspections, meetings, visits and other similar items.
4. Setting the agenda, type and tone of the Board discussions and chairing Board meetings, to promote effective decision making and constructive debate;
5. Providing leadership to the Board;
6. Taking responsibility for the Board's composition and development;
7. Ensuring proper information is made available to the Board;
8. Planning and conducting Board meetings effectively;
9. Getting all Board members involved in the Board's work;
10. Promoting effective relationships and open communication, both inside and outside the Boardroom, between the non-executive Board members and the Executive Committee;
11. Overseeing the induction and development of Board members;
12. Ensuring the Board focuses on its key tasks;
13. Engaging the Board in assessing and improving its performance;
14. Ensuring effective implementation of Board decisions;
15. Establishing a close relationship of trust with the Chief Executive and Finance Manager, providing support and advice, while respecting executive responsibility;
16. Representing the Board and presenting the Board's aims and policies to the outside world;

17. Understanding the views of ratepayers, contributing councils and key stakeholders and ensuring that effective lines of communication exist with the board;
18. Ensuring that the Board engages effectively with the community they represent;
19. Ensuring Board compliance with legislative and Governance requirements;
20. Reviewing value for money and setting benchmark targets.

Chairmen of Works Committees

1. Approve minor works.
2. Approve consents for relaxing Bye-Laws:
    - Relaxation to 4.5 metres from the centre line when a watercourse is piped.
    - Relaxation to 6.0 metres if a clear strip of land is left clear adjacent to the watercourse for the sole use of the Board.
    - Relaxation to allow bushes to be planted 4.5 metres and trees 6.0 metres from the brink of a small or medium sized drain.

Chief Executive

1. Day to day operation of the Board.
2. Recruitment of staff and workforce.
3. Approve expenditure up to a value of £10,000 on maintenance of plant and items which are included in annual estimates and regular budgeted expenditure (e.g. Electricity) in excess of £10,000.
4. Sign Board cheques and instructions to the bank with the Finance Manager, with the Operations Manager and/or the Finance Supervisor substituting if required.
5. Sign agreements and consents on behalf of the Board as set out in the Board's policies.
6. Delivering the operational performance of the IDB, as dictated by the Board's overall strategy;
7. Formulating and successfully implementing Board policy;
8. Developing strategic operating plans that reflect the longer term corporate objectives and priorities established by the Board;
9. Maintaining an ongoing dialogue with the Chairman of the Board;
10. Ensuring that the operating objectives and standards of performance are not only understood but owned by the management and other employees;
11. Providing leadership to the management and employees;
12. Assuming full accountability to the Board for all IDB operations;
13. Building and maintaining an effective executive management;
14. Deriving and delivering improved value for money.
15. Closely monitoring the operating and financial results against plans and budgets;
16. Taking remedial action where necessary and informing the Board of significant changes;
17. Representing the IDB at meetings with major ratepayers contributing councils, professional associations and key stakeholders;
18. Advising the Board on changes in legislation or regulations that affect the operation of the Board;
19. Arranging for the review and audit of the IDB processes and procedures.

Finance Manager

1. Responsible Financial Officer.
2. Approve the write-off of Drainage Rates up to a value of £250.
3. Approve the investment of Board funds in accordance with the Board's Financial Regulations.
4. Approve expenditure up to a value of £10,000 on maintenance of plant and items which are included in annual estimates and regular budgeted expenditure (e.g. Electricity) in excess of £10,000.
5. Sign Board cheques and instructions to the bank with the Chief Executive, with the Operations Manager and/or the Finance Supervisor substituting if required.
6. Ensuring that adequate operational planning and financial control systems are in place;
7. Closely monitoring the operating and financial results against plans and budgets;
8. Taking remedial action where necessary and informing the Board of significant changes;
9. Representing the IDB at meetings with major ratepayers contributing councils, professional associations and key stakeholders;
10. Advising the Board on changes in legislation or regulations that affect the operation of the Board;
11. Arranging for the review and audit of the IDB processes and procedures.

Black Sluice Internal Drainage Board

Policy No 18

Whistleblowing Confidential Reporting Code

Review	Audit & Risk Committee on 26th April 2017
Board Approved	
Reviewed	Within 5 years

1. POLICY AIM

The aim of this policy is to maintain a working environment where people, whether they are employees of the Board, suppliers, contractors, members or private individuals co-opted on to committees of the Board are able to raise concerns where they think there is misconduct or malpractice, and to know that their concerns will be taken seriously and investigated. The policy is intended to give confidence to employees to whistleblow and, as such, it incorporates statutory provision for protection under the Public Interest Disclosure Act 1998. Members of the public may also have concerns. That is why we have produced this whistle-blowing policy not only to help our staff but we have published this document on our website to enable the public to also contact us with their concerns.

2. OUR COMMITMENT

The Board attaches high priority to ethical standards and probity and is committed to taking appropriate action where misconduct or malpractice is identified. We are committed to being open, honest and accountable.

The Board will protect both former and current staff from being penalised for raising concerns about misconduct or malpractice provided that allegations are made in good faith and without mischievous or malicious intent.

The following are affected by this policy:

- All former and current employees including part time, agency, temporary staff and Board Members
- Private individuals co-opted on to committees of the Board
- Suppliers and those providing services under a contract whether working for the Board on Board premises or their own premises.

3. INTRODUCTION

Employees are often the first to realise that there may be something seriously wrong within the Board. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Board. They may also fear harassment or victimisation. In line with the policy statement we encourage employees and others that we work with, who have serious concerns about any aspect of the Board's work, to come forward and voice those concerns. It is recognised that most cases will be confidential. We wish to make it clear that they can do so without fear of victimisation, subsequent discrimination or disadvantage.

This 'Whistleblowing – Confidential Reporting Code' aims to encourage and make it possible for employees to raise serious concerns within the Board rather than overlooking a problem or 'blowing the whistle' outside the Board.

4. AIM AND SCOPE OF THE POLICY

This policy aims to:

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

There are existing procedures in place which make it possible for staff to lodge a grievance relating to their own employment. This policy is intended to cover major concerns that fall outside the scope of other policies and procedures. These concerns include:

- conduct which is an offence or a breach of law
- disclosures related to miscarriages of justice
- health and safety risks, including risks to the public as well as other employees
- damage to the environment
- the unauthorised use of public funds
- the Board's Constitution (including Standing Orders or Other Regulations etc) not being observed or are being breached by members and/or officers
- possible fraud and corruption
- sexual or physical abuse of clients
- other unethical conduct
- information relating to any of the above being deliberately concealed or attempts being made to conceal the same.

This means that any serious concerns anyone has about any aspect of service provision or the conduct of officers or members of the Board or others acting on behalf of the Board can be reported under this policy. This may be about something that:

- makes anyone feel uncomfortable in terms of known standards, their experience or the standards they believe the Board subscribes to
- is against Financial Regulations, Board Procedure Rules, and so on
- falls below established standards of practice
- amounts to improper conduct.

What is not covered?
This policy cannot be used to deal with serious or sensitive matters that are covered by other procedures.

Such procedures include the following:

- Staff complaints about their employment. These complaints are dealt with through our Grievance Procedure
- Customers' complaints about our services. These complaints are dealt with through our Complaints Procedure
- Allegations against members. Those wishing to whistleblow on members should do so directly to the Internal Auditor or the Chief Executive.

5. SAFEGUARDS

The Board is committed to good practice and high standards and wants to be supportive of employees. It is recognised that the decision to report a concern can be a difficult one to make. If what is being reported is true, there should be nothing to fear because the person reporting will be doing their duty to the employer and those for whom they are providing a service. The Board will not tolerate any harassment or victimization (including informal pressures) and will take suitable action to protect anyone when a concern is raised in good faith.

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

6. CONFIDENTIALITY

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

7. ANONYMOUS ALLEGATIONS

This policy encourages anyone to put their name to an allegation whenever possible.

Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Board. In exercising this discretion, the factors to be taken into account would include:

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

8. UNTRUE ALLEGATIONS

If an allegation is made in good faith, but it is not confirmed by the investigation, no action will be taken against the person concerned. If, however, they make an allegation frivolously, maliciously, vexatiously or for personal gain, disciplinary action may be taken against them where appropriate.

9. HOW TO RAISE A CONCERN

If the person works for the Board, they should normally raise their concerns with their line manger. This depends however on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.

For example, if they believe that management is involved they should approach the Chief Executive, or if he is absent or the complaint relates to him, the Internal Auditor or Board Chairman.

Concerns may be raised verbally or in writing. Anyone who wishes to make a written report is invited to use the following format:

- the background and history of the concern (giving relevant dates)
- the reason why they are particularly concerned about the situation.

The earlier the concern is expressed the easier it is to take action. Although no one is expected to prove beyond doubt the truth of an allegation, they will need to demonstrate to the person being contacted that there are reasonable grounds for their concern. Advice and guidance on how to pursue matters of concern may be obtained from:

- The Chief Executive
- The Internal Auditor

It may be appropriate to consider discussing a concern with a colleague first and it may be easier to raise the matter if there are two (or more) of you who have had the same experience or concerns. Anyone may also invite their trade union, professional association representative or a friend to be present during any meetings or interviews in connection with the concerns they have raised. Unions and professional associations may also raise matters of concern on behalf of their members employed by the Board. If anyone prefers not to raise their concern through their line manager, they may report it direct to the Internal Auditor.

If you are a member of the public you should contact the Internal Auditor director, in his absence, the Chief Executive.

Telephone Contacts

Chief Executive 01205 821440

Internal Auditor - David Gowing 01525 861964

10. HOW THE BOARD WILL RESPOND

The Board will respond to any concerns. Do not forget that testing out concerns is not the same as either accepting or rejecting them. Where appropriate, the matters raised may:

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

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

The overriding principle which the Board will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures (for example fraud or discrimination issues) will normally be referred for consideration under those procedures. Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is carried out.

Within ten working days of a concern being raised, a line manager, the Chief Executive or the Internal Auditor, depending upon who has been approached, will write:

- advising that the concern has been received
- advising how we propose to deal with the matter
- giving an estimate of how long it will take to provide a final response
- advising whether any initial enquiries have been made
- supplying information on staff support mechanisms where appropriate
- advising whether further investigations will take place and, if not, why not.

The amount of contact between the officers considering the issues and the person raising them will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, the Board will get further information from them.

The Board will take steps to minimise any difficulties which may be experienced as a result of raising a concern. For instance, if it is necessary to give evidence in criminal or disciplinary proceedings, the Board will arrange for advice about the procedure.

The Board accepts that individuals need to be confident that the matter has been properly addressed. Therefore, subject to legal constraints, we will tell them the outcome of any investigation.

11. THE RESPONSIBLE OFFICER

The Chief Executive has overall responsibility for the maintenance and operation of this policy. In the absence of the Chief Executive the Internal Auditor will act on his behalf. They maintain a record of concerns raised and the outcomes (but in a form which does not endanger anyone's confidentiality) and will report as necessary to the Board.

12. HOW THE MATTER CAN BE TAKEN FURTHER

This policy is intended to provide anyone with an avenue within the Board to raise concerns. If internal advice is required before starting action, you may talk to:

- an immediate line manager, the Internal Auditor or the Chief Executive
- the local union branch.

The Board hopes everyone will be satisfied with any action taken. If they are not, and they feel it is right to take the matter outside the Board, the following are possible contact points:

- appointed external auditor

- UNISON Whistleblowers hotline 0800 0 857 857
- the local Citizens Advice Bureau
- relevant professional bodies or regulatory organisations
- a relevant voluntary organisation
- the police
- the independent charity Public Concern at Work. Their lawyers can give free confidential advice at any stage about how to raise a concern about serious malpractice at work. The charity's contact details are:
  020 7404 6609
  whistle@pcaw.co.uk (enquiries) helpline@pcaw.co.uk (helpline)
  Public Concern at Work, CAN Mezzanine, 7-14 Great Dover Street, London SE1 4YR

If the matter is taken outside the Board, please make sure that you do not disclose confidential information. Check with the Chief Executive or Internal Auditor about that.

13. WHISTLEBLOWING DO'S AND DON'TS

Do

- keep calm
- think about the risks and outcomes before you act
- remember you are a witness, not a complainant
- phone Public Concern at Work for advice on 020 7404 6604

Don't

- forget there may be an innocent or good explanation
- become a private detective
- use whistleblowing procedures to pursue a personal grievance
- expect thanks.

The policy will be reviewed again in 2020 subject to any interim changes in legislation or reorganisation of the staff structure.

Black Sluice Internal Drainage Board
Policy No: 40
Commercial Works Policy

Review Dates:

Original Issue	9th April 2014
Review	Audit & Risk Committee 26th April 2017
Board Approved	

INTRODUCTION

Following a request, the Board will offer quotations to complete relevant works within their normal scope of works on a commercial recharge basis.

Quotations will be offered using the following options:

1. Rechargeable day works
2. Schedule of rates
3. Fixed price/lump sum (all risk)

POLICY

A Commercial quotation will be prepared and presented for acceptance following a review of the current operational works programme. If there is scope for the commercial works to be completed without affecting the programme a quotation may be offered.

A quotation within the options above will be prepared using the current year's job costing rechargeable spreadsheets for labour, plant, stock and other cost items in line with the specific request. The job costing spreadsheet will have an annual review of labour and plant rates by the Finance Manager and a quarterly review of stock rates by the Operations Manager, other cost items will be included at market rates.

Where a fixed price/lump sum is requested the works will be assessed against a programme of events with the relevant resources identified and included, all event risks should be included. A second officer opinion will be sourced and the quotation and programme assessed with any adjustments agreed.

A 5% addition will apply to all quotations to assist in the overhead recovery.

Commercial Works quotations will be forwarded to the clients in letter format for acceptance.

Any works with a value greater than £1,000 must not commence prior to the receipt of a pre-payment or an official order. Any order over £40,000 must be referred to the Board or Committee of the Board before being accepted.

A unique rechargeable cost centre will be raised for each Commercial works.

Works will be invoiced to include for VAT within the month of completion for fixed price/lump sum works or the following month following the full evaluation of allocated costs for day works.

Black Sluice Internal Drainage Board

Policy No: 41

Public Sector Co-Operation Agreement Policy

Review Dates:

Original Issue	9th April 2014
Board Approved	
Due for Review	Audit & Risk Committee 26th April 2017

INTRODUCTION

Following a request the Board will investigate the opportunity of entering into a Public Sector Co-Operation Agreement (PSCA) with other Authorities. To complete relevant works within their normal scope of works on a commercial recharge basis.

PSCA will be agreed using the following options based around the flood risk management functions of the parties made pursuant to section 13 of the Flood and Water Management Act 2010.

1. Rechargeable day works
2. Schedule of rates
3. Fixed price/lump sum (all risk)

POLICY

A PSCA will be prepared and presented for acceptance following a review of the current operational works programme. If there is scope for the PSCA works to be completed without affecting the programme an agreement may be entered into.

Quotations within the options above will be prepared using the current year's job costing rechargeable spreadsheets for labour, plant, stock and other cost items in line with the specific request. The job costing spreadsheet will have an annual review of labour and plant rates by the Finance Manager and a quarterly review of stock rates by the Operations Manager, other cost items will be included at market rates.

Where a fixed price/lump sum is requested the works will be assessed against a programme of events with the relevant resources identified and included, all event risks should be included. A second officer opinion will be sourced and the quotation and programme assessed with any adjustments agreed.

A 5% addition will apply to all quotations to assist in the overhead recover.

PSCA will be forwarded to the clients in letter format for acceptance.

The signed agreement must be returned and orders provided prior to the commencement of any works.

A unique rechargeable cost centre will be raised for each PSCA.

Works will be invoiced to include for VAT at the end of every month following the full evaluation of allocated costs for day works.

Black Sluice Internal Drainage Board

Project Summary

2016/17

Period 11 - February 2017

	Period Current Year			Year To Date					Last Year	
Description	Actual	Budget	Variance	Actual	Budget	Variance	Forecast	Variance	Actual YTD	Variance to Current Year
Rates & Levies	308	306	2	2,050,099	2,052,295	(2,196)	2,050,037	62	2,021,241	28,858
Interest & Grants	402	417	(15)	126,641	4,587	122,054	5,710	120,931	5,672	120,969
Other Income	750	654	96	17,221	16,930	291	12,971	4,250	26,435	(9,214)
Rechargeable Profit	59,516	0	(59,516)	68,240	0	68,240	0	68,240	53,564	14,676
Solar Panel Income	134	683	(549)	14,511	14,209	302	16,836	(2,325)	1,558	12,953
Total Income	**61,110**	**2,060**	**(59,982)**	**2,276,711**	**2,088,021**	**188,690**	**2,085,554**	**191,157**	**2,108,469**	**168,242**
Schemes	20,835	20,000	(835)	111,145	90,000	(21,145)	117,529	6,384	94,805	(16,341)
Pumping Station Schemes	240	0	(240)	63,000	125,000	62,000	134,800	71,800	56,006	(6,994)
Pumping Station Maintenance	14,510	(54,238)	(76,404)	176,904	315,246	38,734	318,453	41,941	178,553	(14,910)
Electricity	7,656	80,607	80,607	99,607					83,049	0
Drain Maintenance	50,949	46,121	(4,828)	687,278	653,482	(33,796)	664,207	(23,071)	540,907	(146,371)
Environmental Schemes	1,678	1,479	(199)	12,943	22,503	9,560	18,367	5,424	12,404	(539)
Administration & Establishment	44,164	40,914	(3,250)	426,864	436,829	9,965	428,592	1,728	423,757	(3,107)
EA Precept	0	0	0	276,552	276,552	0	276,552	0	276,552	0
Solar Panel Expenses	0	0	0	(1,018)	3,193	4,211	1,569	2,587	103,686	104,703
Total Expenditure	**140,033**	**134,883**	**(5,150)**	**1,853,276**	**1,922,805**	**69,529**	**1,960,069**	**106,793**	**1,769,718**	**(83,558)**
Surplus / (Deficit)	**(78,923)**	**(132,823)**	**53,900**	**423,435**	**165,216**	**258,219**	**125,485**	**297,950**	**338,751**	**84,684**
Movement on reserves										
Development Reserve	0	0	0	(39,096)	0	39,096	0	39,096	0	39,096
Plant Reserve	(7,914)	(8,314)	(400)	(126,747)	(114,898)	11,849	0	126,747	(146,243)	(19,497)
Wages oncost Reserve	(2,426)	0	2,426	(6,876)	0	6,876	0	6,876	42,148	49,024
Surplus / (Deficit)	**(68,582)**	**(124,509)**	**51,874**	**596,154**	**280,114**	**200,399**	**125,485**	**125,232**	**442,845**	**16,061**

Black Sluice Internal Drainage Board
Income & Expenditure Summary
2016/17
Period 11 - February 2017

	2016/17	2015/16	Variance
Drainage Rates	1,051,045	1,033,001	18,044
Special Levies	999,053	988,240	10,813
Recoverable	202,112	223,641	(21,529)
Misc Income	184,947	34,123	150,824
Solar Panel Income	14,511	1,558	12,953
	2,451,668	2,280,562	171,106
Employment Costs	959,576	899,528	(60,048)
Property	145,862	191,975	46,112
General Expenses	158,448	184,722	26,274
Materials / Stock	41,935	95,388	53,453
Motor & Plant	137,489	150,502	13,013
Miscellaneous	414,790	838,343	423,553
Recharges	(372,493)	(905,531)	(533,038)
Plant	369,907	382,789	12,882
Total Expenditure	1,855,515	1,837,717	(17,798)
Net Surplus / (Deficit)	**596,154**	**442,845**	**153,308**

Black Sluice Internal Drainage Board
Balance Sheet at Period End
2016/17
Period 11 - February 2017

	2016/17		2015/16	
	£	£	£	£
Operational Land & Buildings Cost	739,350		737,739	
Pumping Stations Cost	3,861,354		3,861,354	
Non-operational Property Cost	130,000		90,000	
Vehicles, Plant & Machinery Cost	804,415		620,280	
Fixed Assets		5,535,119		5,309,373
Stock	23,933		7,774	
Debtors Cont	95,883		86,721	
VAT	56,966		41,357	
Grants Debtor	(3,498)		(36,402)	
Car Loans	14,080		6,057	
Prepayments	31,284		30,459	
Draw Acc	(14,111)		(6,335)	
Call Acc	610,000		310,083	
Petty Cash	501		236	
Rechargeable Work in Progress	7,747		379	
Natwest Government Procurement (	(873)		(389)	
Reserve Account	658,999		922,760	
Total Current Assets		1,480,912		1,362,700
Trade Creditors	(19,179)		(4,334)	
PAYE & NI Control Account	(17,169)		(13,983)	
Superannuation Contrl Account	(14,548)		(14,280)	
Union Subs Control Account	(99)		(124)	
AVC Control Account	0		(50)	
Accruals	(24,000)		(32,282)	
Suspense	0		0	
Total Liabilities		(74,995)		(65,053)
Pension Liability		(2,973,000)		(3,264,000)
		3,968,036		**3,343,020**
Capital Outlay	5,216,031		5,080,536	
Pension Reserve	(2,973,000)		(3,264,000)	
Total Capital		2,243,031		1,816,536
General Reserve	880,038		669,501	
Development Reserve	91,845		168,936	
Plant Reserve	148,322		196,875	
Wage On-Cost Reserve	8,647		48,327	
Surplus/Deficit in Period	596,154		442,845	
Total Reserves		1,725,005		1,526,484
		3,968,036	**0**	**3,343,020**

Cash & Bank Balances

Drawings Account	(14,111)		
Call Account	10,000	610,000	
Natwest Reserve Account @ 0.01%	658,999		
Petty Cash	501		
Chargecard	(873)		
Co-op Community Account 12 Month @ 1.125	300,000		
Monmouthshire BS @ 0.60%	300,000	30 Day Notice	
	1,254,517		

BLACK SLUICE INTERNAL DRAINAGE BOARD
RISK REGISTER

Objectives	Ref	Risk	Potential Impact of Risk	Potential Likelihood of Risk	Risk Score	Gaps in control	Action Plan
To provide and maintain standards of sound needs based sustainable flood protection.	1.1	Being unable to prevent flooding to property or land	High	Low	3		
	1.2	Loss of Electricity Supply	High	Low	3		
	1.3	Pumps failing to operate	High	Low	3		Maintenance
	1.4	Watercourses being unable to convey water	Medium	Low	2		Maintenance
	1.5	In operating machinery to maintain watercourses	Medium	Low	4		Training
	1.6	Claims from third parties for damage to property or injury	Medium	Medium	4		
	1.7	Loss of senior staff	Medium	Low	2		
	1.8	Insufficient finance to carry out works	Medium	Low	2		
	1.9	Reduction in staff performance	Medium	Low	2		
	1.10	Insufficient staff resources	Medium	Low	2		Review
To conserve and enhance the environment wherever practical and possible to ensure there is no net loss of biodiversity.	2.1	Prosecution for not adhering to environmental legislation	Medium	Low	2		BAP
	2.2	Non delivery of objectives	Low	Medium	2		BAP
To provide a 24 hour/365 day emergency response for the community	3.1	Emergency Plan inadequate or not up to date	Low	Low	1		Review
	3.2	Insufficient resources	Medium	Low	2		Review
	3.3	Critical Incident loss of office	High	Low	3	None	
To provide a safe and fulfilling working environment for staff.	4.1	Injury to staff and subsequent claims and losses	Medium	Low	2		Training
	4.2	Not complying with Health and Safety legislation	High	Low	3		Consultant
To maintain financial records that are correct and comply with all recommended accounting practice.	5.1	Loss of cash	Low	Low	1	None	
	5.2	Loss of money invested in building societies and banks	Medium	Low	2	None	
	5.3	Fraud by senior officers	Low	Low	1	None	
	5.4	Risk of Inadequacy of Internal Checks	Medium	Low	2		
To ensure that all actions taken by the Board comply with all current UK and EU legislation	6.1	Board members in making decisions	Low	Low	1		
	6.2	Not complying with all employment regulations and laws	Medium	Low	2		
A cost efficient IDB that provides a Value for Money service.	7.1	Not collecting sufficient income to fund expenditure	Low	Low	1		Accounts
	7.2	IDB abolished or taken over	Low	Low	1		
Information Technology and Communications	8.1	Loss of telemetry	Medium	Low	2		Maintenance
	8.2	Loss of telephone Communications	Low	Low	1		
	8.3	Loss of Internet Connection	Medium	Low	2		
	8.4	Network Failure	High	Low	3		
	8.5	Cyber Attack	Medium	Medium	4		
	8.6	Network Security Breech	Medium	Low	2		
	8.7	Virus on Network	Medium	Low	2		
	8.8	Loss of accounting records	Medium	Low	2	None	
	8.9	Loss of rating records	Medium	Low	2	None	

updated 26th April 2017

CATALOGUE OF BOARD POLICIES

			Reviewed on									To be Reviewed							
			Jan 12	Sep 12	Jan 13	Oct 13	Apr 14	Dec 14	Apr 15	Sep 15	Apr 16	Sep 16	Apr 17	Sep 17	Apr 18	Sep 18	Apr 19	Sep 19	Apr 20	Sep 20
	Management Accounts								✓		✓		✓		✓		✓		✓	
	Annual Accounts									✓		✓		✓		✓		✓		✓
1	Risk Management Strategy	Annual			✓		✓		✓		✓		✓		✓		✓		✓	
2	Risk Register	Annual	To be reviewed at every Board and A&R meeting																	
3	Financial Regulations	3 years			✓			✓			✓							✓		
4	Procurement Policy	5 years			✓			✓			✓							✓		
5	Investment Strategy	5 years	✓						✓										✓	
6	Insurance Arrangements	Annual				✓						✓				✓				
7	Black Sluice IDB H&S Booklet	Annual																		
8	Relaxation of Board Byelaw No 10 (the 9m byelaw)	5 years	✓									✓								
9	Structures Replacement	Annual	To be reviewed annually by Culverts & Bridges Committee																	
10	Delegation of Authority	5 years			✓			✓					✓					✓		
11	Biodiversity Action Plan	5 years	To be reviewed annually by Environment Committee																	
12	Standing Orders		No review required																	
13	Emergency Flood Response Plan (Control Document)	5 years				✓	✓										✓			
14	Complaints Procedure	5 years		✓				✓										✓		
15	Employees Code of Conduct	5 years		✓						✓										✓
16	Fraud and Corruption	5 years			✓					✓										✓
17	Members Code of Conduct	5 years		✓						✓										✓
18	Whistle Blowing Confidential Reporting Code	5 years		✓						✓										✓
19	Anti Bribery	5 years																		
20	Officers Car Loan	5 years		✓						✓										✓
21	H&S Control & Management of Asbestos	5 years							✓										✓	
22	H&S Control of Noise at Work	5 years							✓										✓	
23	H&S Policy for Display Screen Equipment	5 years					✓										✓			
24	H&S First Aid and Accident Recording	5 years							✓										✓	
25	Lone Worker	Annual					✓						✓				✓			
26	H&S Young Persons Safety at Work policy	5 years																		
27	Control of Ragwort	5 years				✓						✓				✓				
28	Land Drains discharging into Board Maintained Watercours	5 years				✓						✓				✓				
29	Control of Rabbits, Rats & other Rodents	5 years				✓						✓				✓				
30	Pension Discretion LPF 2014	5 years				✓	✓										✓			
31	Publication Scheme	5 years			✓						✓									
32	Data Protection	5 years			✓						✓									
33	Smoking Policy	5 years						✓										✓		
34	Gift and Hospitality	5 years				✓						✓				✓				
35	Fire Management Plan	5 years						✓	✓										✓	
36	H&S Manual Handling Operations	5 years						✓										✓		
37	H&S Managing Stress in the Workplace	5 years						✓										✓		
38	H&S Vibration at Work policy	5 years						✓										✓		
39	H&S Wearing of seat belts in Boards vehicles	5 years						✓										✓		
40	Commercial Works	5 years					✓	✓					✓							
41	Public Sector Co-operation Agreement	5 years					✓						✓							
42	Near Miss Reporting	5 years								✓							✓			✓
43	Electronic Information and Communication Systems	5 years																		