

BLACK SLUICE

INTERNAL DRAINAGE BOARD



Audit & Risk Committee Meeting

Tuesday 25th April 2023 at 2pm

Station Road, Swineshead, Lincolnshire PE20 3PW



Black Sluice Internal Drainage Board

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Our Ref: IW/DPW/B10_1

Your Ref:

Date: 18th April 2023

To the Chairperson 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 Tuesday, 25th April 2023 at 2pm at which your attendance is requested.

Chief Executive

A G E N D A

1. Recording the meeting.
2. Welcome guests and apologies for absence.
3. Declarations of interest.
4. To receive and, if correct, sign the Minutes of the Audit & Risk Committee Meeting held on the 25th October 2022 **(pages 1 - 6)**
5. Matters arising.
6. To review the current insurance arrangements with representatives from the NFU **(pages 7 - 16)**
 - (a) To consider the provision of using tractors to run pumping stations in the event of an emergency and how this is insured
7. A presentation from the Internal Auditor, Mr C Harris, and to receive the following:
 - (a) Internal Audit Report 2022/23 **(pages 17 - 26)**
 - (b) Audit Programme 2023/24 **(pages 27 - 29)**
8. To review the following Board policies:
 - (a) Policy Statement Water Level & Flood Risk Management (Policy A) **(pages 30 - 37)**
 - (b) Policy No. 01: Risk Management Strategy **(pages 38 - 59)**
 - (c) Policy No. 03: Financial Regulations **(pages 60 - 64)**
 - (d) Policy No. 04: Procurement **(pages 65 - 73)**
 - (e) Policy No. 23: H&S Policy for Display Screen Equipment **(pages 74 - 84)**
 - (f) Policy No. 25: Lone Worker **(pages 85 & 86)**
 - (g) Policy No. 32: Data Protection **(pages 87 - 95)**
9. To review the following proposed new policies:
 - (a) Health & Wellbeing **(pages 96 - 99)**
 - (b) Sickness absence management **(pages 100 - 109)**
10. To receive the Risk Register **(page 110)**
11. To review the Board's Catalogue of Policies **(page 111)**
12. 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
25th October 2022 at 2pm

Members

Chairperson - * Mr M Brookes

Mr W Ash	* Mr V Barker
* Mr M Leggott	* Mr J Fowler
* Cllr R Austin	* Cllr S Walsh

* Member Present

In attendance: Mr I Warsap (Chief Executive)
Mr D Withnall (Finance Manager)

2041 Recording the Meeting - Agenda Item 1

Members were informed that the meeting would be recorded.

2042 Apologies for absence - Agenda Item 2

Apologies for absence were received from Mr W Ash.

2043 Declarations of Interest - Agenda Item 3

No declarations of interest were received.

2044 Terms of Reference - Agenda Item 4

The Finance Manager noted that the only proposed change is the terminology that is being added into all terms of reference, to acknowledge that the meetings are public.

Cllr S Walsh questioned if the wording should restrict the public to those only within the Board's catchment. It was confirmed that they are public meetings and anybody, irrespective of residing within the Board's catchment or not, could attend.

The Committee RESOLVED to recommend that the Audit & Risk Committee Terms of Reference be approved at the next Board meeting.

2045 Minutes of the last meeting - Agenda Item 5

Minutes of the last meeting held on 12th April 2022, copies of which had been circulated, were considered and it was AGREED that they should be signed as a true record.

2046 Confidential Minutes of the last meeting - Agenda Item 6

Confidential Minutes of the last meeting held on 12th April 2022, copies of which had been circulated, were considered and it was AGREED that they should be signed as a true record.

2047 Notes relating to the insurance renewal for 30 September 2022 - Agenda Item 7

Notes relating to the insurance renewal (30 September 2022) from the informal meeting held on 14th September 2022 were noted as received.

The committee were reminded that due to the death of Her Majesty Queen Elizabeth II, the planned Audit & Risk Committee meeting to review the insurance renewal could not go ahead. However, all were invited to make comments and / or observations through email, before the decision was made.

The Finance Manager outlined the following to the committee:

From the three received quotes, it was evidently clear which was most competitive – that being the NFU. Once the decision had been made to insure with the NFU, three options, as below, were considered:

- As per the cover currently in place, without any cover for pumping stations, the pumping plant or contents of pumping stations.
- As per the cover currently in place with the surface buildings of pumping stations, pumping plant and contents of pumping stations included, but not the pumping station substructures.
- As per the cover currently in place with pumping stations fully covered including substructures.

It was concluded that for the additional premium, to fully insure pumping stations including substructures, it was good value for money and offered the Board security and assurance. It was therefore concluded to fully insure, with pumping stations including substructures.

The Finance Manager also noted the current benefit of 8.5% discount due to the Board already holding NFU membership. After the first year, the Board would receive another 8.5% discount (mutual bonus), which going forward, would increase by 1% each year. Based on this, it was concluded to insure with the NFU for a five-year period in order to gain these discounts, however it doesn't mean the Board are locked into it.

Next, the group accident insurance was noted, the Finance Manager explaining that the Board had this cover under the impression that it covered the Board Members for works inspections etc.. However, during the review it has come to light that the Board Members are covered by employer's liability as voluntary employees of the Board, which has no age limit. Therefore, there was no benefit for Board Members with the group accident insurance. This cover was then reviewed in terms of benefit to employees, the NFU cover level for death is £60,000 and £100 per week for total disablement. However, through the pension scheme for death in service, three times the employee's salary would be received, and the Board also pay 6 months full sick pay and 6 months half sick pay and so it was felt that, in light of this, there was no benefit in continuing with the group accident insurance. It was also noted that NFU would pay £10,000 accidental death payment.

It was further noted that the ride on lawn mower has been added to be covered for road traffic as it works within a metre of roads.

Mr V Barker questioned the level employees are covered for in relation to accident and death? It was confirmed that employers' liability insurance covers up to £15 million.

Mr J Fowler thanked the Finance Manager for his work on obtaining and reviewing the insurance quotes, noting that The Risk Factor are way above the other two quotes, suggesting that they perhaps don't understand the business of the Board and whether the Finance Manager would consider not using them for a quote in the future. The Finance Manager noted that The Risk Factor provided a competitive quote for the Witham and Humber Board's, however, it was noted that they have recently lost a pumping station and so their claim on their insurance may have affected the quote received.

The Chairperson, and committee, thanked the Finance Manager for his work.

The NFU membership was noted, it being explained that it has to be held in an individual name, the committee felt, that in future, it should be in the name of the Finance Manager.

The Chairperson added that, going forward, it would be best practice to review this early on, meaning the Spring meeting and asked whether the committee would be interested in the insurance representative attending that meeting to go through the review? The committee AGREED this would be beneficial.

2048 Matters arising - Agenda Item 8

(a) Risk Management Strategy (Risk 1.1(b) – Fluvial flooding from failure or overtopping of defences) – Minute 1964(a)

Mr V Barker noted that he has had a Rural Payments Agency (RPA) inspection in which they wanted to know where the Environment Agency's hand-off levels were, and so he disappointingly informed them that these levels are at Black Sluice Pumping Station (Boston); around 20km away.

2049 To receive the Annual Return including External Auditor's Opinion for 2021/2022 - Agenda Item 9

The Annual Return including External Auditor's opinion was presented, it being noted that there were no matters to report from the external audit.

The Chairperson, and committee, expressed their congratulations and noted well done to all the team.

2050 To review the following Board's policies - Agenda Item 10

The Finance Manager explained that these are policies that have been identified for review and any changes have been made in red, points to note highlighted in yellow and any additional notes made in green.

(a) Policy No. 4: Procurement Policy

The Chief Executive drew the committee's attention to the proposed new paragraph regarding the SCAPE Access Agreement for the Public Sector, explaining that it is proposed to add this to allow the Board to place orders through this framework, noting that the Black Sluice Catchment Modelling Study involves a company called Stantec who operate through this SCAPE agreement.

The Chairperson felt that framework agreements such as these are a positive thing and allow for contracts to be placed quickly.

Cllr S Walsh added that if it makes it simpler, to add it within the policy.

Cllr R Austin questioned if there is anything controversial within it? The Chief Executive confirmed there isn't.

The Committee RESOLVED to recommend that the Procurement Policy (No. 04) be approved at the next Board meeting.

(b) Policy No. 30: Local Government Pension Scheme Discretions Statement Scheme Employers

The Finance Manager explained that the pension provider produces a guide template for this policy and the changes shown in red reflect the changes of wording being suggested by them, there is no change to the content or meaning, it is just a change of wording to try and make it clearer. The Finance Manager also reminded the committee that they suggest it is reviewed annually but is has been agreed that the Board will review every three years.

The Finance Manager further noted that the recommended (non-mandatory) LGPS 2013 & 2014 discretions has previously not been included in the policy, due to them being non-mandatory and not wanting to add confusion to the policy, but they have been included in red in the policy presented to allow the committee to review. All AGREED to remove the 'Recommended (non-mandatory) LGPS 2013 & 2014 discretions' section of the policy.

The Committee RESOLVED to recommend that the Local Government Pension Scheme Discretions Statement Scheme Employers (No. 30) be approved at the next Board meeting, with the above amendment.

(c) Policy No. 48: Substance and Alcohol Misuse (Draft new policy)

The Chairperson informed the committee that this is a draft new policy.

The Chief Executive noted that it has been identified that there are some policies which other IDBs have, which this Board doesn't and so these policies are starting to be produced and brought to the committee for review.

The Chief Executive referred to the paragraph highlighted in yellow, regarding the testing of employees for substances and alcohol. The Chief Executive stated that testing would be done on a voluntary basis from the employee and therefore questioned whether it is worth having it within the policy if the employee could refuse to be tested anyway, the Chief Executive noting that, in his opinion, it should be included to show that it could be asked of the employee.

Further noting that if the committee wanted to keep the testing element within the policy, it would have to be presented to the union.

The Chairperson felt that if it can't be enforced, then what is the point in it being included in the policy.

Mr V Barker referred to the 'White Book' (ADA Lincolnshire Branch Wages and Salaries and Conditions of Service) and questioned whether further detailed policies are required if it is included within that? It was confirmed that there is very little in the White Book regarding this.

Cllr S Walsh gave a 'real-life' example scenario he experienced during his career in General Practice, in which an employee was accused of taking drugs. The HR company advised that testing is voluntary, but that declining testing could be seen as an admission of guilt. Cllr S Walsh added that testing can be done through a urine sample, blood sample or hair follicle – if using urine samples, it has to have been consumed within the last 48 hours to show up. Cllr S Walsh also noted the cost associated. Further adding that, in his opinion, it should be included to protect the safety of all employees.

Mr M Leggott gave the example of an employee going out drinking all weekend and then coming into work on the Monday morning, questioning if the Board supply employees with do-it-yourself breathalysers for them to check they are within the limit? The Chief Executive noted that he has asked the operations management team what they would do if they believed somebody had attended work under the influence, to which they responded that they would be withdrawn from work / taken home on full pay and then further discussion would have to take place. Also noting that the majority of the workforce have to drive to get to the depot or their machine.

It was noted that within the construction industry, it is common practice for random testing to take place. The Chief Executive acknowledged that the Board is not a construction company, but that the workforce is operating large and powerful machinery.

Mr M Leggott felt that from a health and safety perspective, he can't see why the union would not be agreeable to the testing element, as it is a matter of safeguarding their members.

The Finance Manager noted that the union will likely want to know the detail behind the proposed testing, i.e., by whom, who will be subject to testing etc.

Cllr S Walsh felt it would only be invoked where there was an identified concern, or thereafter. The Finance Manager added that the Board do also have provision to send employees for a medical.

Mr M Leggott agreed, adding that random testing could become costly and also alienate employees to a certain extent.

The Chairperson suggested that the committee can't make a decision on this until a conversation with the union has taken place.

Cllr R Austin noted the advantage of having a small number of employees and therefore the managers know and have close working relationships with employees.

Mr J Fowler added that the union are likely to be discussing this with various other organisations on a regular basis, also noting that it is only echoing the law of public land.

All AGREED for the Board's Officers to discuss the proposed policy and element of testing employees for substances and alcohol with the union and the response to be reported back to the Board meeting in November.

It was noted that the paragraph included in red was background information for the committee only and will not form part of the policy.

The Committee RESOLVED to recommend that the Substance and Alcohol Misuse policy (No. 48) be approved at the next Board meeting, excluding the paragraph regarding testing, to be reviewed, by the Board, with the response from the union.

2051 To receive the catalogue of Board Policies with recommended approval dates – Agenda Item 11

The Committee AGREED that the Catalogue of Board Policies be adopted.

2052 To review the Risk Register - Agenda Item 12

It was noted that the only risk with a score of 6 is Risk 1.8 - Loss of senior staff, which relates to the current circumstances of the Chief Executive.

The committee AGREED that the Risk Register be accepted.

There being no further business the meeting closed at 14:46.

AUDIT & RISK COMMITTEE INSURANCE DISCUSSION



Report prepared by

J.D. Burton & P.J Ingleby
Partners
Ingleby, Cross, Burton, Powell & Thorpe

Renewal date: 30th September, 2023



BUSINESS DESCRIPTION

The business description covered within all policies underwritten by NFU Mutual is Land Drainage Authority and Contractors, Land Owners, Property Owners, Civil Engineers, Ecological and Environmental Managers, Electricity Generation -Solar PV and Lessors of Land for Mobile Phone Mast.

MOTOR FLEET AND COMMERCIAL VEHICLES

INTRODUCTION

1. Cover is provided under a Motor Fleet Policy for Light Goods Vehicles, Unimog, Pick Up Trucks and trailers.

Comprehensive cover is provided on all vehicles under the Motor Fleet, subject to a £250 Fleet excess in respect of Accidental Damage, £100 for Fire and Theft including Windscreens at £50 via NFU Mutual approved company.

Cover is operative on an any driver over 25 basis with no restrictions on those entitled to drive, provided they hold a valid driving licence for the Motor Fleet.

2. A separate Commercial Vehicle policy covers your special type vehicles such as Forklifts, Teleporters, Excavators etc. Liability is extended for damage to underground pipes and cables on the Excavators and Twigas.

Comprehensive cover is provided on all vehicles under the Commercial Vehicle policy, subject to a £300 excess in respect of Accidental Damage, £100 for Theft, £0 for Fire including Windscreens at £50 via NFU Mutual approved company.

Cover is operative on an Any Driver basis with no restrictions on those entitled to drive, provided they hold a valid driving licence for the Commercial Vehicle Policy.

3. Use of the vehicles extends to include Social, Domestic and Pleasure purposes including commuting to one's normal place of work as well as use in connection with your business as detailed in the Motor Fleet Policy and Commercial Vehicle Policy. Should you wish to use your vehicles for any other activity, please contact us beforehand so that we may amend cover appropriately to provide the necessary protection.

SELF INSURANCE OR DISCUSSION TOPICS FOR MOTOR

Loss of Use

Payment of a daily selected benefit amount following damage to your vehicle by an insured event which renders the vehicle inoperative whilst the repairs are carried out, or a replaced, and a replacement needs to be hired in. Cover currently does exist for a small courtesy vehicle (Not a direct replacement for your vehicle) in the event of damage to insured Cars and Light Goods Vehicles. This is available under the motor fleet but not under the commercial vehicle policy.



Loss of Hiring Charges

Payment for continuing hiring charges should hired vehicles be damaged whilst in your possession and not available for further hire until repaired or replaced.

Road Rescue

Road Rescue is automatically provided for private cars under our fleet insurance providing cover for an hours roadside repair and recovery to safe storage within 20 miles. It is possible to extend this to a full recovery service and also to include light goods vehicles should you wish.

Protected No Claims Discount

Your commercial vehicles have full 60% no claims discount which is not protected. An additional 15% premium would be chargeable per vehicle to provide the protection. This is not available on the motor fleet policy.

BUSINESS PROPERTY

Property & Business Interruption

1. Cover is on a Commercial All Risks basis, including Subsidence apart from on the Pumping Stations where no Subsidence cover is present.

Total declared value for all buildings including pumping stations: £60,947,707

Total contents inc general contents, machinery, solar panels, plant, computers. tools: £772,715

Total stock and goods held in trust: £35,000

- Excesses vary across the different locations focussing primarily on storm and flood which varies from £2,500 to £5,000 at the pumping stations. However, where the claim may relate to windstorm the excess is lowered to £350 by endorsement.
- Assets that are stored in the open are covered for theft with an excess of £500.
- Excess for Subsidence is £1,000
- Renewables (Solar Panels) excess is £500
- £350 for all other claims

2. **Additional Cost of Working and Loss of Income**
Cover additional cost of working for your business if your activities are impacted by an insured event up to 12 months for a sum insured of £500,000 and Loss of Rental Income up to sum insured of £7,366 on Hessle Drive.
3. **Money & Malicious Attack**
Your money is protected against loss or theft at your premises and whilst you take it to the bank. If you or your employees aged 16 to 70 are assaulted whilst working, it will provide a range of lump sums and weekly benefits for death or disability.



SELF INSURANCE OR DISCUSSION TOPICS FOR PROPERTY

Machinery and/or Computer Breakdown & Resultant Business Interruption

The Accidental Damage peril specifically excludes claims arising from Mechanical Breakdown, however cover for certain types of plant and machinery, and computers, can be included to provide cover in respect of sudden and unforeseen breakdown as well as any subsequent business interruption costs.

Terrorism

Cover in respect of property and business interruption losses arising from an act of terrorism are currently excluded from the current policy cover.

Business Interruption Terminal Ends

The standard cover provided by the policy provides for loss of income arising from damage to the land based premises of the utility provider, by an insured peril. An optional extension is available to provide for loss of income arising from the accidental failure of the public supply of electricity gas water or telecommunications at the terminal point of the supply undertaking's service feed to your premises.

Cover excludes failure of the supply lasting less than 4 consecutive hours or 24 hours for telecommunications, as well as any deliberate act of the supply undertaking.

GOODS IN TRANSIT

To cover loss or damage to your own goods while in transit in your vehicle or trailer up to £5,000. Number of vehicles 6.

Excess is £250.

LIABILITY

Employers Liability

A standard £10m Indemnity Limit is provided via NFU Mutual and a further £5m is purchased via Great Lakes Insurance total £15m.

Public and Products Liability

A £5m Indemnity Limit is provided in respect of Public and Products Liability via NFU Mutual and a further £5m is purchased via Great Lakes Insurance total £10m. For Public Liability your limit is the maximum amount for any one claim, whilst for Products Liability your limit applies to the total amount of claims in any one period of insurance.



Restrictions in cover for both of the above

- Restrictions on cover include depth work exceeding 5 metres from the surface for the making of sewers or other excavations.
- Tunnelling except during construction or replacement of water carrying pipework, pile driving except temporary trench sheeting, dam construction including work within or behind dams unless the said dam is one of YOUR pumping stations or sluices or constructed of temporary sheeting, the construction and maintenance of reservoirs and lakes other than reservoirs and lakes up to a maximum of 20,000m³ or the construction of other water courses other than drainage channels.
- The construction alteration or repair of towers, steeples, chimneys, shafts except inspection manhole shafts to a maximum depth of 3m and access shafts to lower sumps within pumping stations, blast furnaces, viaducts or docks.
- The construction, alteration or repair of bridges or tunnels unless formed during construction or replacement of water carrying pipework / structures or the alteration or repair of low load bearing bridges up to a maximum 20m length, 4 m wide and 3.5 height above water level.
- Height work to 15 metres above the floor.

Environmental Liability

Businesses can cause environmental damage despite the best of intentions. If your business is legally liable, the potential cost of putting right the damage is expensive and environmental issues need to be resolved quickly and sensitively to avoid reputation damage.

A £1m indemnity limit is provided in respect of Environmental Liability via AIG with a £10,000 excess for covered operations described as Watercourse vegetation clearance, silt clearance, and water level management control within your catchment area.

The insurer will, subject to the Ts & Cs pay all unexpected and unintended losses you are legally obligated to pay as a result of claims or legal proceedings arising from

- Clean Up costs. Reasonable and necessary expenses for the investigation, removal, remediation including but not limited to associated monitoring, or disposal of soil, surface water, groundwater or other contamination:
1: to the extent required by Environmental Laws; or
2: that have been actually incurred by any governmental or statutory body or agency, or by a Third Party.
- Bodily Injury. Physical injury, sickness, disease, mental anguish or emotional distress sustained by any third party, including death resulting therefrom.
- Property Damage. Physical injury to or destruction of tangible property including the resulting loss of use thereof; or loss of use of tangible property that has not been physically injured or destroyed.
- Biodiversity Damage. Actual physical injury or destruction of water, land or protected species or natural habitats.
- Nuisance Claims. Claims that arise with respect to statutory, public or common law nuisance.

caused by Pollution conditions resulting from covered operations as defined above.

In addition, the insurer agrees to pay

- Defence costs
- Mitigation expense



Arising from any of the 5 bullet points above.

Exclusions are noted as:

- Pollution conditions not related to covered operations within the business description.
- Intentional Non-Compliance
- Products
- Contractual Liability
- Fines and Penalties
- Employer Liability
- War and Terrorism
- Radioactivity
- Professional Services
- Asbestos
- Insured vs Insured
- Sanctions

SELF INSURANCE OR DISCUSSION TOPICS FOR LIABILITY

Drones

Should you use your own drones for business purposes, including the viewing of your own land then specialist aviation insurance will need to be put in place as cover for their use is specifically excluded from standard commercial insurance policies.

LEGAL EXPENSES

Legal Expenses

With new and constant changes in legislation affecting your business, Legal Expenses insurance provides cover for legal costs in pursuing or defending incidents arising from :

- Employment disputes and compensation awards.
- Legal Defence
- Contract disputes over £250
- Property Protection and bodily injury
- Tax Protection

In connection with your business up to a maximum £250,000 for legal costs.

Access to a number of dedicated helpline services is also included.



ENGINEERING INSPECTION

Engineering Inspection

Inspection service of plant as required and the issue of reports to comply with statutory requirements.

Indemnity in respect of legal liability under a hiring agreement for loss of or damage to Plant and Machinery and continuing hiring charges is endorsed on the policy to include up to a maximum of £15,000 during the period of insurance.

MANAGEMENT LIABILITY

Directors and Officers

Legal liability for directors, officers and senior managerial staff against claims arising from their actions and decisions in their official capacities.

An indemnity limit of £3m in respect of management liability and corporate liability per single claim.

A £nil excess applies.

Employment Practices Liability

Provides cover for a wide range of actual or alleged employment practices violations, such as harassment, unfair dismissal and discrimination.

A limit of £1m applies per single claim.

A £2,500 excess applies.

Fraud

Provides cover for all monetary losses incurred by you as a result of dishonest act being any dishonest or fraudulent act by an employee with the intention of obtaining improper financial gain.

A limit of £250,000 applies per single claim.

A £2,500 excess applies.

Exclusions include Absolute professional services exclusion. This states that the insurer will not be liable under this policy for you carrying out, or failing to carry out, professional services. Cyber acts or incidents are also not covered by this policy.



PROFESSIONAL INDEMNITY

Also known as “Errors and Omissions” Insurance. A Professional Indemnity policy provides cover to protect policyholders in respect of claims against them relating to breaches of professional duty. The nature of professional duty and therefore coverage varies from business to business. Cover is provided on a “claims made” basis.

A £2m limit on an aggregate basis is covered within this policy inclusive of costs.

A £5,000 excess applies.

Exclusions that apply are that this policy will not provide cover for a claim arising from the provision of, or failure to provide legal advice of any kind by or on behalf of you. Cyber acts or incidents are also not covered by this policy.

SELF INSURANCE

MISCELLANEOUS

Crime

Can arise from both Employee dishonesty or third party dishonesty and crime losses can be significant, as they can go undetected for a number of years.

There is a general acknowledgement that crime is becoming more sophisticated and the damage is not just the impact on profit and cash flow but also on the reputation of a business which may impact on acquisition plans and investment in the business. The investigation costs associated with crime can also be significant.

Credit

Covers bad debts due to the insolvency or non-payment of insured customers.

Personal Accident & Illness

Protection against the financial impact of death or disability following an accident or illness.

Business Travel

Protection for insured persons and their possessions whilst undertaking business travel on behalf of their employer.

CYBER LIABILITY

Cyber Liability Insurance is designed to help you manage and control the impact of a cyber attack if your first line of defence is breached.



It is a blend of insurance protection and risk management tools, providing access to a range of independent experts.

Cyber Liability can provide the following support :-

Breach Response

- Immediate intervention by a breach coach to support the business in the initial hours after an attack is suspected
- Engagement of forensic experts to establish what has been affected, how it can be contained and subsequently repaired
- Legal and PR response teams to contain reputational damage
- Cover for costs of notifying data subjects who may be affected
- Preparation for any subsequent investigation, together with cover for any insurable fines or penalties
- Cover for any defence costs or damages arising from situations such as : -
 - breach of personal or corporate data
 - theft of data containing hardware
 - negligent act or error by an employee
 - virus contamination of third-party data

Business Interruption

Loss of income and additional expenses incurred as a result of the suspension or degradation of the company's machinery or computer system caused by a security failure.

Business Interruption - Outsource Service Provider

Loss of income and additional expenses incurred as a result of the suspension or degradation of the service provided by the outsource service provider caused by an unintentional and unplanned failure of the outsource service providers computer system including the inability to access own company data caused by the outsource service provider failure.

Digital Media

Damages and defence costs resulting from a claim made by a third party arising from publication or broadcast of digitised content on your website or social media outlets or a breach of third-party intellectual property.

Cyber Extortion

Ransom payments to third parties incurred in terminating a threat to release or destroy data, introduce malware or corrupt your computer system.

Cyber Crime

Protects insured for liabilities, loss of profits and reputational damage relating to breach of confidential data and / or a system intrusion such as virus or denial of service attack.

A 24/7 helpline is provided to give the customer access to legal and forensics specialists.

Can also cover

- network interruption
- extortion
- digital media
- telephone hacking
- computer crime





Internal Audit

FINAL

Black Sluice Internal Drainage Board

Assurance Review of Annual Governance and Accountability Return

2022/23

February 2023

Executive Summary

OVERALL ASSESSMENT



ASSURANCE OVER KEY STRATEGIC RISK / OBJECTIVE

The audit covers all areas required by the Annual Governance and Accountability Return (AGAR) and includes, where appropriate, the key risks for a drainage board.

SCOPE

The purpose of the review was to undertake sufficient audit work to be able to sign off the Annual Governance and Accountability Return for Internal Audit.

KEY STRATEGIC FINDINGS

-  Black Sluice Internal Drainage Board has good systems in place and the governance, risk and control framework is working well.
-  Black Sluice Internal Drainage Board use the "Opera" suite of software to manage their accounts which supports accurate accounting and good record keeping.

GOOD PRACTICE IDENTIFIED

-  The Black Sluice IDB has a very informative website which is easy to navigate, well populated with useful and key information.
-  The Black Sluice IDB has excellent governance, risk, and control procedures in place with appropriate reporting to the Board and Committees.

ACTION POINTS

Urgent	Important	Routine	Operational
0	0	0	1

Assurance - Key Findings and Management Action Plan (MAP)

Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
No recommendations raised.							

PRIORITY GRADINGS

1 **URGENT** Fundamental control issue on which action should be taken immediately.

2 **IMPORTANT** Control issue on which action should be taken at the earliest opportunity.

3 **ROUTINE** Control issue on which action should be taken.

Operational - Effectiveness Matter (OEM) Action Plan

Ref	Risk Area	Finding	Suggested Action	Management Comments
2	Delivery	<p>Reserves are regularly reviewed, however there is some discrepancy between the Board minutes of the 8th February 2022 which states:</p> <ul style="list-style-type: none"> • "Maintain the general reserve above 20% of expenditure, and • Increase the general reserve to 30% over the ten year period, to allow for uninsured pumping station risks. <p>The new Financial Regulation which states:</p> <ul style="list-style-type: none"> • "to maintain the Board's general reserves above the target of 30% of annual expenditure (agreed by the Board on 23rd November 2021). <p>The Board need to regularise this situation so that the Board approval and Financial Regulations state the same for Reserves.</p>	<p>The Board to agree the wording and approve this for Financial Regulations with regard to the Reserves policy.</p>	<p>On 14 February 2023 a full meeting of the Board agreed that the new policy for reserves will be as follows;</p> <ul style="list-style-type: none"> • Maintain the General Reserve at between three and twelve months of net revenue expenditure. (as per JPAG Practitioners Guide) • Aim to be able to fund a minimum of two consecutive "Wet" years of Electricity from the General Reserve. • With the General Reserve at the target level aim for a balanced budget. <p>This will be the exact wording included in the minutes and will be included within the Financial Regulations Policy to be reviewed by the Audit and Risk Committee on 25 April 2023.</p>

ADVISORY NOTE

Operational Effectiveness Matters need to be considered as part of management review of procedures.

Findings



Directed Risk:

Failure to properly direct the service to ensure compliance with the requirements of the organisation.

Ref	Expected Key Risk Mitigation	Effectiveness of arrangements	Cross Reference to MAP	Cross Reference to OEM
GF	Governance Framework There is a documented process instruction which accords with the relevant regulatory guidance, Financial Instructions and Scheme of Delegation.	In place	-	-
RM	Risk Mitigation The documented process aligns with the mitigating arrangements set out in the corporate risk register.	In place	-	-
C	Compliance Compliance with statutory, regulatory and policy requirements is demonstrated, with action taken in cases of identified non-compliance.	In place	-	-

Other Findings

- All the Board's policies and procedures are on their website. These are all appropriate and adequate for a drainage board. The website itself is easy to navigate. A number of the Board's policies were reviewed and found to be in order. Risk Management Strategy; Financial Regulations (to note the 30% of expenditure reserves policy); Members Code of Conduct; H&S policies; Gifts and Hospitality; Near Miss Reporting Policy; Substance and Alcohol Misuse Policy. The review periods for each Policy was noted which were all within the agreed term.
- All Board agendas and minutes (none confidential) are on the Boards website. The following were reviewed and found to be comprehensive and informative: The minutes of the following Board meetings: 8th February 2022 and 14th June 2022 and the unapproved minutes on the 22nd November 2022 (awaiting approval at the 14th February 2023 meeting).
- A selection of Committee agendas/minutes were reviewed as follows: Audit and Risk Committee (12th April 2022) minutes; Executive Committee (17th January 2023) agenda (proposed rate increase for 2023/24 of 27.96%). These were all in order.
- The Risk Management Strategy and Policy was approved on 14th June 2022 and is reviewed annually.

Other Findings

The risk register and the controls are comprehensive documents that are regularly reviewed by the Audit and Risk Committee. The officers and Committee Members are engaged in reviewing the risks/controls in the register and in assessing their importance at each committee meeting.

Near misses reporting is an important part of good risk management. It was noted that five near misses had been reported to the Board at its November 2022 meeting:

Date	Description of Near Miss	Reason/Action
15/07/2022	Unimog loose wheel after changing.	Faulty torque wrench/New wrench calibrated periodically.
22/07/2022	Twiga machine slipped towards drain.	Too close to bank top/toolbox talk to all drivers.
23/07/2022	Skirth drain Aebi wheel dropped into hole bank top.	Not visible from cab/walk over survey prior.
16/09/2022	Twiga top half of door glass smashed.	Wind blew door from hand/don't open top half of door from ground in high winds.
25/10/2022	Stone from flail mowing broke parked car windscreen.	Front flap (long grass) on flail raised/ensure all guards are lowered in urban areas.

The Board use the Association of Drainage Authorities (ADA) key objectives as their overarching objectives that support the operation and direction of the Black Sluice IDB.

"Opera" is the main accounting package for the IDB. Opera is part of a suite of software solutions provided by Pegasus a software developer. Opera is a recognised suite of accounting software widely used by small to medium sized organisations.

Management accounts are submitted to every Board meeting to inform Members of the current financial state of the IDB with year-to-date figures. Drainage Rates and Special Levies are also reported on a regular basis to each Board meeting to include collection details.

The Purchase Order system was reviewed, and it was confirmed that where appropriate to use the Purchase Order system, goods received had been confirmed and invoices had been matched back to the purchase order. The approval process was in accordance with Financial Regulations/Procurement policy.

A sense check was undertaken on all payments made for the months of February 2022 through to and including October 2022. All payments made were appropriate to a drainage board. Many payments are repeated each month to cover regular ongoing commitments. All payments are referred to the Board who are able to query any of those payments. The Finance and Operations Manager sign to confirm that each months payments are in order.

At the Board meeting on 8th February 2022 a 4.18% increase in the rate was approved. Rates for 2022/23 would therefore be (Sub district No. 1 (6.86p) and Sub-District No. 2 (13.71p)). These sums would provide a rate income estimated to be £1,139,520.36 for the year.

For the rating system as at 24th January 2023, six unpaid accounts had been summonsed for collection. These debts totalled £2,541.84. Five of these debts were with the bailiffs for collection and was being dealt with by the solicitor for the deceased.

Debt collection procedures for rates follow a predetermined timeline which confirms that demands are posted on time and follow up procedures are in place to enable all sums due to be collected or correctly accounted for.

Other Findings

-  Debt collection for general debtors are chased on a regular basis. At the time of the audit (1 February 2023) there were three large debtors that had been outstanding for more than three months:
 - 1) Balfour Beatty - £4,250
 - 2) RTW Group Ltd - £23,240.08
 - 3) Seagate Homes (UK) Ltd - £17,861.68.

Seagrave homes has now been paid. Balfour Beatty is still outstanding and further recover proceedings are likely. RTW Group the work has not yet started so recovery proceedings are on hold.
-  A small number of write offs were made During the year. One write off was for £2,519.72 (rates for Glasshouses that were removed). The Board approved this write off at its meeting on 22nd November 2022.
-  The Board still operate a small petty cash imprest. The latest entries were for December 2022. The petty cash balance stood at £243.96. Although there had been little petty cash movement in year the 2022 transaction receipts and vouchers were reviewed and found to be in order.
-  The payroll for December 2022 was reviewed and found to be in order. Payroll is a well-controlled and cyclical process only requiring adjustment for new starters or leavers or when a pay increase is required. The system was working well and in order.
-  The whole payroll for December 2022 including expenses was reviewed and found to be in order. In addition, national insurance and income tax deductions had been correctly made and these had been paid over to HMRC.
-  Pension deductions and payment to the Lincolnshire County Council (LCC) pension fund were reviewed for the month of December 2022. These were in order and the sums involved were paid over to LCC.
-  The asset register is updated annually at the end of the financial year. The register at the end of March 2022 was reviewed and found to be in order. The register is well maintained.
-  As this was a remote audit no assets were verified at this time.
-  Accounting Statements are undertaken and these reconcile to the cash book.
-  Data feeding into the Accounting Statements was confirmed to be correct.



Delivery Risk:

Failure to deliver the service in an effective manner which meets the requirements of the organisation.

Ref	Expected Key Risk Mitigation	Effectiveness of arrangements	Cross Reference to MAP	Cross Reference to OEM
PM	Performance Monitoring There are agreed KPIs for the process which align with the business plan requirements and are independently monitored, with corrective action taken in a timely manner.	In place	-	1
S	Sustainability The impact on the organisation's sustainability agenda has been considered.	In place	-	-
R	Resilience Good practice to respond to business interruption events and to enhance the economic, effective and efficient delivery is adopted.	In place	-	-

Other Findings

- Management accounts, including budget data, are reported regularly to Members and the Board. The Board papers for the year were reviewed and it was confirmed that appropriate financial and budget data was presented to every Board meeting.
- The Board maintain a 10-year forecast which enable future increases in both the penny rate and precept to be calculated and for such bodies as the precepting authorities to be consulted well in advance of any increases being made. The Executive Committee were looking to approve the budget for 2023/24 with a 27.96% rate increase.
- The majority of income is received via a bank transfer. Cash is normally retained and used as petty cash. Cheques are banked at the local Post Office as and when received. There had been little activity regarding cash and cheques. The recording and banking of income was working well.
- The various (Call account, Drawings account, 35 Day account, Reserves account) bank and credit card reconciliations were examined and found to be in order and in balance as at 6th January 2023.
- The Board is operating within its approved budget for the 2022/23 financial year.
- Good practice is adopted by the Board to respond to business interruption events and to enhance the economic, effective and efficient delivery of its services.

Scope and Limitations of the Review

1. The definition of the type of review, the limitations and the responsibilities of management in regard to this review are set out in the Annual Plan. As set out in the Audit Charter, substantive testing is only carried out where this has been agreed with management and unless explicitly shown in the scope no such work has been performed.

Disclaimer

2. The matters raised in this report are only those that came to the attention of the auditor during the course of the review, and are not necessarily a comprehensive statement of all the weaknesses that exist or all the improvements that might be made. This report has been prepared solely for management's use and must not be recited or referred to in whole or in part to third parties without our prior written consent. No responsibility to any third party is accepted as the report has not been prepared, and is not intended, for any other purpose. TIAA neither owes nor accepts any duty of care to any other party who may receive this report and specifically disclaims any liability for loss, damage or expense of whatsoever nature, which is caused by their reliance on our report.

Effectiveness of arrangements

3. The definitions of the effectiveness of arrangements are set out below. These are based solely upon the audit work performed, assume business as usual, and do not necessarily cover management override or exceptional circumstances.

In place	The control arrangements in place mitigate the risk from arising.
Partially in place	The control arrangements in place only partially mitigate the risk from arising.
Not in place	The control arrangements in place do not effectively mitigate the risk from arising.

Assurance Assessment

4. The definitions of the assurance assessments are:

Substantial Assurance	There is a robust system of internal controls operating effectively to ensure that risks are managed and process objectives achieved.
Reasonable Assurance	The system of internal controls is generally adequate and operating effectively but some improvements are required to ensure that risks are managed and process objectives achieved.
Limited Assurance	The system of internal controls is generally inadequate or not operating effectively and significant improvements are required to ensure that risks are managed and process objectives achieved.
No Assurance	There is a fundamental breakdown or absence of core internal controls requiring immediate action.

Acknowledgement

5. We would like to thank staff for their co-operation and assistance during the course of our work.

Release of Report

6. The table below sets out the history of this report.

Stage	Issued	Response Received
Audit Planning Memorandum:	23 rd January 2023	23 rd January 2023
Draft Report:	15 th February 2023	15 th February 2023
Final Report:	17 th February 2023	

AUDIT PLANNING MEMORANDUM

Appendix B

Client:	Black Sluice IDB		
Review:	Annual Governance and Accountability Return		
Type of Review:	Assurance	Audit Lead:	Chris Harris

Outline scope (per Annual Plan):			
Detailed scope will consider:	<p>Directed</p> <p>Governance Framework: There is a documented process instruction which accords with the relevant regulatory guidance, Financial Instructions and Scheme of Delegation.</p> <p>Risk Mitigation: The documented process aligns with the mitigating arrangements set out in the corporate risk register.</p> <p>Compliance: Compliance with statutory, regulatory and policy requirements is demonstrated, with action taken in cases of identified non-compliance.</p>	<p>Delivery</p> <p>Performance monitoring: There are agreed KPIs for the process which align with the business plan requirements and are independently monitored, with corrective action taken in a timely manner.</p> <p>Sustainability: The impact on the organisation's sustainability agenda has been considered.</p> <p>Resilience: Good practice to respond to business interruption events and to enhance the economic, effective and efficient delivery is adopted.</p>	
Requested additions to scope:	(if required then please provide brief detail)		
Exclusions from scope:	None		

Planned Start Date:	30/01/2023	Exit Meeting Date:	07/02/2023	Exit Meeting to be held with:	Daniel Withnall
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SELF ASSESSMENT RESPONSE

Matters over the previous 12 months relating to activity to be reviewed	Y/N (if Y then please provide brief details separately)
Has there been any reduction in the effectiveness of the internal controls due to staff absences through sickness and/or vacancies etc?	
Have there been any breakdowns in the internal controls resulting in disciplinary action or similar?	
Have there been any significant changes to the process?	
Are there any particular matters/periods of time you would like the review to consider?	

BLACK SLUICE INTERNAL DRAINAGE BOARD

AUDIT & RISK COMMITTEE - 25 APRIL 2023

AGENDA ITEM 07(b)

Internal Drainage Boards – Remote auditing audit programme

2023/24 Internal Audit Arrangements

The main content of the internal audit is to check, examine and review governance, risk, control and the financial systems which we have found can be successfully undertaken remotely. TIAA along with any of our competitors now carry out its business of internal audit almost exclusively remotely and adequate auditing has been proven to work successfully. This also now fits in with our Environmental policy and for ourselves to become net zero by 2030. One of our main CO2 issues has been the high mileage of our vehicles in getting to client's offices. Remote (home) working has now to a very large degree eliminated this issue. I will, however, still visit clients' offices as required and will for any Board or Committee attend these in person.

As I am requesting a remote audit again for 2023/24, to enable a satisfactory outcome I will require the following data/documents to be emailed to me at the time of the audit. The audit programme of work for 2023/24 will be consistent with previous years to enable me to sign off the AGAR statement for internal audit.

I am, however, always open to requests from either management or Board Members should they be of the opinion that matters relating to audit, but outside of the AGAR requirements, could benefit from an independent review. Within reason these would always be accommodated with the annual fee.

Strategic Risks

Governance

- 1) Review Constitution, Standing Orders, Financial Regulations, Award of Contracts and other procedures (I will obtain this data from your website)
- 2) Review Board agendas and minutes for the year (I will require the latest three meetings data – agendas and minutes please. Also include the latest meeting agenda)
- 3) Review any Committee agendas and minutes for the year (I will require the latest three meetings data – agendas and minutes please. Also include the latest meeting agenda)
- 4) The drainage board has published information on its website to comply with the Transparency Code for smaller authorities (I will obtain this data from your website)
- 5) The drainage board for the previous year correctly provided for the period for the exercise of public rights as required by the Accounts and Audit Regulations (I will obtain this data from your website, and from sight of your Board minutes approving the dates set)
- 6) The drainage board has complied with the publication requirements as stated by the Accounts and Audit Regulations 2015 (Please provide evidence that these have been complied with)

Risk Management

- 1) Review risk management policy and procedures (These should be on the website, but please provide if not)
- 2) Review risk register (If not on the website please provide)
- 3) Review process and procedures for how risk is managed on a day by day basis (A brief note on this please)

- 4) Review key objectives for the IDB and the risks associated with achieving these objectives (This should flow from the risk register)
- 5) Review the controls in place to mitigate these risks and see how effective they are. (These should be contained within the risk register. I may select a sample for review to confirm working as expected)

Operational Risks

Accounting Records

- 1) Review the accounting records for the IDB
- 2) Are these up to date and in balance (A current trial balance please and a copy of the profit and loss account and balance sheet at the time of the audit)

Expenditure

- 1) Review accounts payable (creditors) (An aged creditors list please)
- 2) Test a sample of payments made to verify they have been correctly paid. Check if possible the receipt of the goods. Check accuracy, procedures (purchase order system) and approval process – was this in accordance with Financial Regulations. (I will select my sample from the expenditure items reported to the Board meetings) (Copies of the supporting documents for the sample selected will be required)
- 3) Check treatment of VAT (included above)

Budget

- 1) Review the budgetary arrangements. (This should be available in the Board papers)
- 2) Review the precept of rates (Please provide the Board agenda and minute approving the penny rate for 23/24 if not already provided above)
- 3) Review how the budget is monitored (These should be included in the Board papers above)
- 4) Review reserves and the policy for these (Please provide latest reserves position and 5/10 year forecast that shows how general reserves are expected year on year in the future)

Income

- 1) Review accounts receivable (debtors) (An aged debtors list please – both general and rates)
- 2) Review debt collection procedures (Please confirm debt collection arrangements and dates)
- 3) Review any write off arrangements (Please provide details of any write offs – approval/procedures)
- 4) Review recording and banking of income (Please confirm banking arrangements particularly cash or cheque)
- 5) Test a sample of payments received to verify they have been correctly dealt with. Check accuracy and procedures – was this in accordance with Financial Regulations. (Please provide a list of debts raised in the year and I will select a sample for a more detailed review)
- 6) Check treatment of VAT (included above)

Petty Cash (if appropriate)

- 1) Check the Petty Cash arrangements where held
- 2) Verify Petty cash is in balance, test a sample of transactions for relevance and accuracy and that a valid receipt is present. (Please provide a short note on petty cash and confirm VAT has been correctly treated)
- 3) Check treatment of VAT (included above)

Payroll

- 1) Review the payroll system
- 2) Test a sample of employees for accuracy of pay and treatment of variations including Tax and NI. (Please provide a summary of payments made to staff which includes all deductions both employee and employer)
- 3) Verify PAYE and NI requirements have been met (Please confirm and evidence that PAYE, NI and pension payments have been made to HMIC and LCC)

Asset Register

- 1) Verify the asset register is complete and up to date. (Please provide a copy of the asset register)
- 2) Verify where possible the asset and investment exists (I will not be confirming that any asset exists for this audit!!)

Bank

- 1) Verify and confirm bank reconciliations have been regularly undertaken. (Please provide a latest bank reconciliation)
- 2) Confirm end of year bank reconciliation (Year end follow up audit)

Accounting Statements

- 1) Verify accounting statements have been undertaken and reconciled to the cash book. (Please confirm and year end follow up audit)
- 2) Review and verify the audit trail of sums feeding into the accounting statements. (Year end follow up audit)

Black Sluice Internal Drainage Board

Policy No: A

Policy Statement on Water Level and Flood Risk Management

Review Dates:

Original Issue	30 th May 2018
Board Approved	

1 INTRODUCTION

Purpose

- 1.1 This policy statement has been prepared by Black Sluice Internal Drainage Board (the Board) to provide a public statement of the Board's approach to its management of flood risk and water levels within the Black Sluice Internal Drainage District (the District). The Board is constituted by order of Parliament operating under the terms of the Land Drainage Act 1991 and is designated as a flood risk and coastal erosion 'Risk Management Authority' (RMA) under the Flood & Water Management Act 2010.
- 1.2 The Board serves the local community by managing water levels in ordinary watercourses and other water infrastructure within the District to mitigate against the risks from flooding and drought. In delivering its functions the Board will meet its environmental obligations and commitments and seek opportunities to enhance the environment. The Board recognises its responsibility for good governance, local accountability and financial security, achieving value for money from all its activities. As an independent public body the Board is committed to the pursuit of economy, efficiency and effectiveness.

Background

- 1.3 The Department for Environment Food and Rural Affairs (Defra) has policy responsibility for flood and coastal erosion risk management in England. The Environment Agency is responsible for taking a strategic overview of the management of all sources of flooding and coastal erosion. Lead Local Flood Authorities (unitary authorities or county councils) are responsible for developing, maintaining and applying a strategy for local flood risk management in their areas. Delivery is the responsibility of a number of flood risk and coastal erosion 'Risk Management Authorities' (RMA), which includes the Black Sluice IDB.
- 1.4 This Policy Statement sets out the Board's approach to meeting the national policy aims and objectives in this area, as stated in the National flood and coastal erosion risk management strategy for England 2020 (the National Strategy); the statement will be revised to reflect future revisions of the National Strategy. It summarises what plans the Board has in place to manage water levels and reduce flood risk, whilst protecting and enhancing the environment, and ensuring good governance and local accountability. Copies of this Policy Statement are available from the Board's office at: Station Road, Swineshead, Boston, Lincolnshire PE20 3PW. Digital copies can be downloaded from the Board's website (www.blacksluiceidb.gov.uk).

2 GOVERNANCE AND LOCAL ACCOUNTABILITY

- 2.1 The Board will ensure that its policies and procedures enable effective representation of and accountability to drainage ratepayers and the occupiers of non-agricultural land within the District, including triennial elections in line with the requirements of the Land Drainage Act 1991, and timely engagement with charging authorities to fill vacancies in seats allocated to appointed members.
- 2.2 Board members must take decisions objectively in the best interests of the Board and uphold the ethical standards expected of public officeholders. Board members must adhere to the Board's Members Code of Conduct, including the seven principles of public life (Nolan Principles). The Board will make sure that there is suitable training in place for board members and staff, including on financial and environmental matters as appropriate.
- 2.3 Board members must declare financial and other interests relevant to their function with the Board. Board members will recuse themselves as appropriate where conflicts of interest may occur in relation to procurement, contract management and decision making.

3 DELIVERING THE NATIONAL STRATEGY'S POLICY AIM AND OBJECTIVES

Aim

- 3.1 The overall aim of the National Strategy is to ensure the risk of flooding and coastal erosion is properly managed by using the full range of options in a co-ordinated way. The Strategy states that communities, individuals, voluntary groups and private and public sector organisations will work together to manage the risk to people and their property; facilitate decision-making and action at the appropriate level; and achieve environmental, social and economic benefits, consistent with the principles of sustainable development.

Objectives

- 3.2 The Strategy sets out five objectives in pursuance of the overall aim as follows:
- (a) understand the risks of flooding and coastal erosion, working together to put in place long-term sustainable plans to manage these risks and making sure that other plans take account of them;
 - (b) to avoid inappropriate development in areas of flood and coastal erosion risk and being careful to manage land elsewhere to avoid increasing risks;
 - (c) build, maintain and improve flood and coastal erosion management infrastructure and systems to reduce the likelihood of harm to people and damage to the economy, environment and society as well as achieving wider environmental benefits;

- (d) increase public awareness of the risk that remains and engaging with people at risk to encourage them to take action to manage the risks that they face and to make their property more resilient; and
- (e) improving the detection, forecasting and issue of warnings of flooding, co-ordinating a rapid response to flood emergencies and promoting faster recovery from flooding.

3.3 The Board supports the national aim and objectives for the management of flood risk and water levels and the Board’s policy and approach will be consistent with them.

4 FLOOD RISK AND WATER LEVEL MANAGEMENT IN THE BOARD’S DISTRICT

4.1 The District has been determined to derive benefit, or avoid danger, as a result of drainage operations. As such the whole of the District is at some risk from flooding, but that risk is managed wherever it is practically, environmentally and financially viable¹.

4.2 The Board makes decisions regarding flood risk within the District taking into account the following:

- (a) assets in place considering design standard and life;
- (b) Environment Agency and Lead Local Flood Authority flood risk strategies, plans and maps; and
- (c) other information such as the history of flooding and land use impacts.

4.3 The following outlines the key details of the District:

Total area of the Black Sluice IDB Drainage District	47,220 ha
Catchment area draining to and including the District	67,293 ha
Total area of the District	47,220 ha
Area of Agricultural Land	43,886 ha
Area of other (non-agricultural) land	3,334 ha
Site of Designated Environmental Interest:	
Horbling SSSI	15 ha
The Wash SSSI & Ramsar	42 ha

¹ It should be noted that the Land Drainage Act 1991 provides the Board with statutory powers to carry out works of maintenance and improvement for land drainage and flood defence purposes, rather than imposing a duty on the Board to carry out such works.

4.4 Assets for which the Board has operational responsibility:

Watercourses (maintained)	755 km
Raised Embankments	4 km
Pumping Stations	34 (63 pumps)

4.5 Assets within or adjacent to the District that are maintained by the Environment Agency:

Main Rivers	169.5 km
Raised embankments / flood walls	7.9 km (Sea Defences) 172.2 km (River Flood Defences)
Pumping Stations	2

5 BUILDING, MAINTAINING AND IMPROVING FLOOD AND COSTAL EROSION RISK MANAGEMENT SYSTEMS

- 5.1 Through the operation, maintenance and improvement of watercourses and other water control assets within the District, the Board seeks to achieve a general standard of water level management that enables the drainage and irrigation of agricultural land, reduces flood risk to developed areas, and sustains environmental features throughout the District.
- 5.2 The Board monitors and reviews the condition of its watercourses and other assets, particularly those designated as critical, over-spilling from which could affect people and property. Consistent with the resultant needs established, a routine maintenance programme is in place to ensure that the condition of the assets is commensurate with the standards required. The programme is reviewed periodically by the Board to ensure it is delivering the appropriate condition.
- 5.3 Where standards are not at the desired level, improvement works will be sought where they are considered to be practical and financially viable by the Board. Where improvement works meet the criteria set by Defra, financial support will be sought from the **National Flood and Coastal Erosion Risk Management (FCERM) Strategy for England**. Where appropriate works will be undertaken in partnership with other Risk Management Authorities and take opportunities to work with natural processes.
- 5.4 Work for and by the Board will be carried out in accordance with best practice and to deliver best value for money taking due regard of local flood risk management requirements and strategies, opportunities for partnership working, environmental obligations and guidance available from Defra, the Environment Agency and other organisations.

- 5.5 The Board's powers to carry out water level and flood risk management works are permissive (i.e. the Board is not obliged to carry out works) and their resources are limited. The Board's policy is therefore to designate what the Board considers to be the most important watercourses in the District as "District Drains" and prioritise their resources to the appropriate maintenance and, where necessary, improvement of such channels and associated structures. The watercourses and structures so designated will change over time as necessary but the current designated watercourses and structures are shown on the plan attached to this Statement.
- 5.6 Other watercourses usually are the responsibility of other bodies or the adjoining owners. The Board will only take action in respect of these latter watercourses where resources are available and where it is in all the circumstances appropriate for the Board to become involved, bearing in mind the powers available to other persons or bodies.
- 5.7 The Board has a supervisory duty, under section 1(2)(d) of the Land Drainage Act 1991 over all matters relating to the drainage of land in their District and will, under this duty where appropriate advise others regarding the undertaking of works when it is not appropriate for the Board to exercise its own powers.
- 5.8 The Board will also seek to ensure, where possible, that assets managed by other Risk Management Authorities, which also reduce flood risk to the District, are maintained at a satisfactory standard and may enter into a Public Sector Co-operation Agreement with another Risk Management Authority to achieve better value for money when carrying out work to reduce flood risk.

6 REGULATION OF ACTIVITIES – AVOIDING INAPPROPRIATE DEVELOPMENT AND LAND MANAGEMENT

- 6.1 The Board will take appropriate steps to help riparian owners understand their responsibilities for maintenance, byelaw compliance and environmental regulations.
- 6.2 The Board will regulate as necessary, using available legislative powers and byelaws, the activity of others to ensure their actions within, alongside, and otherwise impacting its drainage system do not increase flood risk, prevent the efficient working of drainage systems, or adversely impact the environment.
- 6.3 The potential impact on flood risk from future development, both within the District and the wider catchment draining into the District, is fully recognised by the Board. The Board will take an active role in the assessment of local plans, major development and, individual (planning) applications, to prevent inappropriate development and land use to ensure that flood risk is not increased. This will include, where appropriate, providing pre-application advice and checking of flood risk assessments.

- 6.4 Where appropriate the Board will seek contributions from developers to cover the cost of both immediate and longer term works necessary to mitigate against any resultant increase in flood risk. ~~Such contributions will be recorded in accordance with the National Planning Policy Framework and associated technical guidance.~~
- 6.5 The Board will where appropriate designate structures or features affecting flood risk using section 30 of the Flood and Water Management Act 2010.

7 **COMMUNICATION AND TRANSPARENCY**

- 7.1 The Board will publicise the local risks from flooding, the reasons for managing water levels within the District and articulate the efforts being undertaken by the Board to manage water levels and flood risk as well as the steps the local community and land managers can take to assist in its management.
- 7.2 The Board will be open and transparent in its actions and decisions. The Board will comply with the requirements set out in the relevant Local Government transparency code.
- 7.3 The Board will provide an overview of the objectives and costs of its water level management operations by publishing on its website:
- (a) A record of the watercourses it periodically maintains;
 - (b) A statement of the types of general maintenance activities it routinely undertakes and why;
 - (c) Its Annual Report to Defra (IDB1 Form); and
 - (d) Approved Board minutes and papers.
- 7.4 The Board will seek views and respond to enquiries from the local general public in this regard and work with local partners to build a culture within which watercourses are seen as vital to managing flood risk, and enhancing habitat and amenity. Every effort will be made to dissuade abuse of watercourses.
- 7.5 The Board invites any comments regarding the condition of its system, which could assist with the management of water levels.

8 **WORKING TOGETHER**

- 8.1 The Board will co-operate and share information with other relevant authorities in the exercise of their flood and coastal erosion risk management functions. The Board will contribute to strategies, plans and consultations relevant to its catchment and functions.

- 8.2 The Board will assist the Environment Agency wherever possible in its provision of adequate and cost effective flood warning systems, and assist Risk Management Authorities where necessary during flood emergencies. The Board will participate as necessary in exercises to develop and test emergency response procedures.
- 8.3 The Board has provided the Environment Agency and other local Risk Management Authorities with information on the major flood defence assets for which the Board is responsible.
- 8.4 The Board will seek to work with all relevant local organisations, in carrying out its flood and coastal erosion risk management functions and environmental obligations.

9 ENVIRONMENTAL MEASURES

- 9.1 The Board has nature conservation duties under the Land Drainage Act 1991, the Wildlife and Countryside Act 1981, the Protection of Badgers Act 1992, the Countryside and Rights of Way Act 2000, the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003, the Eels (England and Wales) Regulations 2009, the Flood and Water Management Act 2010, the Natural Environment and Rural Communities Act 2006, Salmon and Freshwater Fisheries Act 1975, and as a competent authority under the Conservation of Habitats and Species Regulations 2017. The Board will fulfil these in a positive way.
- 9.2 Much of the Board's watercourse maintenance work constitutes vegetation control and de-silting and is often a vital and routine requirement. Whilst inevitably some short or long term impacts may arise, this management is often essential to maintain the distinct assemblage of aquatic habitat and species present in the district. Such work will be carried out in a way that manages the potential risks to the environment. The Board has access to environmental expertise from their Conservation Consultant, and have a Biodiversity Action Plan, developed according to ADA and Natural England guidelines, which indicates the way in which their functions can be carried out in a way appropriate to the environment and how the environment can be enhanced. The Board maintain only a small proportion of the total watercourse length in the District, the significant majority being the responsibility of the adjoining land owners or of other bodies.
- 9.3 When carrying out work, be it maintenance or improvement, and consistent with the need to maintain satisfactory flood protection standards, we will aim to:
- (a) Avoid any unnecessary or long term damage to agricultural interests and to natural habitats and species;
 - (b) Carry out the monitoring of any gains and losses of biodiversity and report annually to the Environment Agency; and

(c) Take appropriate opportunities to achieve multiple environmental outcomes and work with natural processes, wherever possible, including the enhancement of habitats and water bodies within the District.

9.4 The District is situated within numerous sites of national biological or geological interest including:

9.5 Horbling SSSI, The Wash SSSI and The Wash Ramsar.

9.6 The Board has one Water Level Management Plan.

9.7 The Board will play its full role in sustaining the Water Level Management Plans prepared for SSSIs to maintain, or bring sites into, favourable condition, in conjunction with Natural England and other interested parties and review the plans in accordance with guidance.

10 APPROVAL AND REVIEW OF THIS POLICY STATEMENT

10.1 This **policy statement** was adopted by the Board on **13 June 2023**.

10.2 Black Sluice IDB will review and update this Policy Statement as and when changes to policies are made and notwithstanding within a period not extending beyond five years.

Black Sluice Internal Drainage Board

Risk Management Strategy

Risk Management Policy

Risk Analysis

Updated	25 April 2023
Board Approved	
Due for Review	Annually

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- A – Risk Management Strategy Statement
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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.

6. 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

Likelihood of occurrence ↑ HIGH MEDIUM LOW ↓	HIGH	Low Impact High Likelihood 3	Medium Impact High Likelihood 6	High Impact High Likelihood 9
	MEDIUM	Low Impact Medium Likelihood 2	Medium Impact Medium Likelihood 4	High Impact Medium Likelihood 6
	LOW	Low Impact Low Likelihood 1	Medium Impact Low Likelihood 2	High Impact Low Likelihood 3
		LOW	MEDIUM	HIGH
		← Impact on the Business →		

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 (between £20,000 and £100,000). 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 £20,000). 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.

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.

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 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 flooding from failure or overtopping of defences

Consequence: Land and Properties could be subjected to flooding (EA Risk) and IDB Pumping Stations could be required to deal with substantial additional flows

How risk is managed: Board works with lead local flood authority, Environment Agency and the Wash Frontage Group.

Future Work: Lobbying of government representative

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

(b) 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 Partnership working with EA including PSCA Agreement with EA to **remotely implement emergency profile levels as per the emergency plan, if levels reach 2.7m ODN at Black Hole Drove PS.** EA Management Plan on the operation of the sluice and nav lock at Black Sluice Pumping Station included as an appendix to the Emergency Response Plan.

Future Work: To engage with the Lower Witham Flood Resilience Project.

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

(c) 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
Comprehensive programme of maintenance works
PTO gear boxes and generator connections.

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

(d) 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
The Board has permissive powers for the supervision of drainage in the Board's catchment and in the extended catchment on behalf of Lincolnshire County Council under PSCA.

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, Main server and Phone System

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 is continuously programmed
Continued investment planned for pumping stations

Further Work: ~~In 2021 it was decided not to insure Pumping Stations Buildings or Plant as the cost was prohibitive and not considered value for money. This will be reviewed during 2022.~~

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

1.4 Risk of Board Watercourses being Unable to Convey Water

Consequence: High water levels and possible flooding from over topping
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 plant & 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	2

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
 Damage to Third parties
 Damage to plant & vehicles

Consequence: Injury to staff
~~Loss of income~~ Uninsured costs
 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	LOW	2

1.7 Risk of Third Parties damage to Board maintained assets

Risk: Damage to Board Maintained Assets
 Damage to Board Owned Assets

Consequence: Assets not performing as they are designed to.

How risk is managed: Managed Assets – Board Byelaws
 Owned Assets - Insurance

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

1.8 Risk of Unplanned Loss of Senior Staff

Consequence: Inability to operate efficiently

How risk is managed: Should staff from the Emergency response Team not be available during a prolonged event cover should be implemented as per the emergency response plan
 Hire in temporary staff from Agencies or other local Drainage Boards
 Formalised arrangements to share staff from other drainage boards

Further Work: Contingencies for Senior roles to be considered further.
~~Work ongoing to develop a more resilient structure to coincide with the retirement of the current CEO.~~

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

1.9 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
Significant unexpected costs to respond to incidents or extended periods of wet weather.
Excessive Electricity Costs

How risk is managed: Ten year budget to ensure adequate funding
~~The Board maintains reserves at a level sufficient to respond to incidents and extended periods of wet weather.~~
Reserves to be increased to a level that would allow electricity bills to be paid in wet conditions experienced for two consecutive years. Financial Regulations updated.
Ongoing continuous liaison with Precept paying Councils

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
HIGH	MEDIUM	6

1.10 Reduction in Staff Performance

Consequence: Reduced standards of maintenance

How risk is managed: Ongoing continuous supervision, advice, training, line management motivation and appraisal.
Management systems

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

1.11 Insufficient Staff Resources

Consequence: Reduced standards of maintenance
Reduced value for money

How risk is managed: Review by senior management
Reports to Executive Committee
Terms of Employment regularly reviewed to remain competitive

Further Work: **Work ongoing to develop a more resilient structure to coincide with the retirement of the current CEO.**

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
Environmental clean-up liability Insurance (£1m)
Environmental Impairment Liability Insurance

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	LOW	1

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 (Staff and Equipment)

Consequence: Inability to provide adequate response
Unable to recruit sufficient workforce

How risk is managed: Shared resources with neighbouring Boards
Use local farmer/landowner resources
Review resources available
Review remuneration considering local circumstances

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/business interruption (£100k over a 12 Months period)
Remote Backups to HBP servers kept for 365 days
Well-practiced procedures for working from home by all office based staff if required. Invested in technology to enable.

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
Employers Liability Insurance (£15m)
Personal Accident Insurance (£60k & £100pw)

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
Insurance for Manslaughter Costs and Safety Legislation costs (£1m each)

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
Insurance (£500 out of safe overnight to £5,000 during business hours)
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 & Managed Funds

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 an individual organisation as per the Investment Policy
Maximum of £500,000 invested in a managed fund.
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/approve 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
MEDIUM	LOW	2

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
 Additional independent checks carried out with supplier to avoid "Mandate fraud"

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

5.5 Fraudulent use of Credit Cards

Consequence: Loss of money

How risk is managed: The Board has insurance up to £1,000 per card (Card limits £5k, £5k & £2,500)
 Card expenditure is reconciled monthly and certified by both CEO & FM

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

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

6.1 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: Insurance (£3m Legal Liability Cover)
 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 (£1m Employment Practices Cover)
 Advice from consultants and solicitors and the industry
 The Board employs a Qualified HR Adviser

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
Comprehensive Annual Budgets and ten year estimates produced
Ongoing continuous liaison with Precept paying Councils
Reserves to be increased to a level that would allow electricity bills to be paid in wet conditions experienced for two consecutive years. Financial Regulations updated.

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
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
Upgraded the Telemetry Systems including the ability for remote operation.

Further Work: Continue to maintain trained staff to monitor telemetry
Work ongoing to

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
14 VOIP phones (All with soft phones on computers and mobiles)
2 Analog lines on site
UPS (Battery Backup) on Communications Cabinet
~~4G Assure on both Broadband lines if landlines fail~~

Further Work: ~~Mobile Broadband contract maintained with WiFi router.~~
To be tested as whether it will support Phone calls.

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
~~4G Assure on both Broadband lines if landlines fail~~
Mobile Broadband contract maintained with WiFi router.

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 including disaster recovery
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 Breach 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
Staff Training (All staff have completed classroom and online training provided by our IT consultants and Sophos as a minimum)

Unified Threat Management system installed and subscription maintained
 All information taken off site digitally is encrypted and password protected
 Remote Backups to HBP servers kept for 365 days. Monthly backups taken and removed from site.
 Introduction of Electronic Information and Communication Systems Policy (was part of the 'White Book' previously)
 Dual Authentication system for any access to the Board's Network or Microsoft Cloud systems

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

8.6 Risk of Network Security Breach

Consequence: Unauthorised access to the Network and information stored on the network
 How risk is managed: Unified Threat Management installed and subscription maintained
 Dual Authentication system for any access to the Board's Network or Microsoft Cloud systems

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, desktop computers and laptops and managed centrally
 Hard Firewall installed to prevent unauthorised person introducing virus
 Emails filtered off site by Message Defence and Office 365 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: Insurance for Business interruption £100k for up to 12 months
Computer systems are regularly reviewed by trained staff and external IT consultants
Volume Shadow software copies back up every six hours
Remote Backups to HBP servers kept for 365 days

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: Insurance for Business interruption £100k for up to 12 months
Volume Shadow software copies back up every six hours
Computer systems are regularly reviewed by trained staff and by external IT consultants
Remote Backups to HBP servers kept for 365 days

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

Black Sluice Internal Drainage Board

Policy No: 3

Financial Regulations Policy

Review Dates:

Original Issue	16 th January 2013
Board Approved	

1. INTRODUCTION

- 1.1 The Accounts and Audit Regulations 2015 and the financial provisions of the Land Drainage Act 1991, place a responsibility on Drainage Boards to ensure that the financial management of Boards is adequate and effective.
- 1.2 Financial Regulations set out the framework of the rules for the proper financial administration of the Board and the responsibility of those charged with carrying out duties with financial implications.

2. RESPONSIBILITY FOR FINANCIAL CONTROL

- 2.1 The Finance Manager is appointed by the Board as the Responsible Financial Officer as required by the Local Government Act 1972, Section 151.
- 2.2 The Finance Manager shall be responsible to the Board for overall financial control of the Board's financial affairs and the continuous provision of financial management information.
- 2.3 The Finance Manager shall be responsible for maintaining the integrity of the accounting, financial administration and financial control systems of the Board.

3. ANNUAL ESTIMATES AND BUDGETS

- 3.1 The Chief Executive and the Finance Manager shall, each financial year, prepare estimates of income and expenditure for the ensuing financial year, using the best information available. Such estimates will be presented to the Executive Committee in January to allow recommendations to be put to the Board before 15th February on the level of the penny rate and council special levies.
- 3.2 The Chief Executive and the Finance Manager shall also each year produce a ten year projection to estimate levels of balances, so that the penny rate can be set at appropriate levels.
- 3.3 The Board meeting in February will set and Seal the Rate for the ensuing financial year.
- 3.4 The Board shall be kept informed by the Finance Manager of the overall financial position of the Boards finances through monthly management accounts, quarterly forecasts and other reports as necessary.

4. PAYMENTS OF ACCOUNTS / ORDERS

- 4.1 All requests for goods and services shall be issued on official order forms authorised as set down in the procurement policy.
- 4.2 All invoices, claims and accounts shall be authorised by the Finance Manager or **Chief Executive** before payment ensuring that the payment is legal and within the power of the drainage board.
- 4.3 Payments will be made twice each month, by faster payment, processed by the second and last Friday in each period.
- 4.4 Direct Debit payment may be set up for regular monthly payments, either fixed or variable
- 4.5 The Finance Manager shall prepare a monthly schedule of payments that have been made.
- 4.6 All Schedules of payments are to be reported to the next available Board meeting.

5. INCOME

- 5.1 Procedures for the collection of all income due to the Board shall be under the control of the Finance Manager.
 - a) Invoices are to be raised promptly.
 - b) Statements to be sent on a monthly basis following the month the invoice was sent. (Copy invoices also to be sent if deemed required).
 - c) Any debtors outstanding over three months are to be reported to the Executive Committee.
- 5.2 Payment received on behalf of the Board by cheque will be paid into the Board's bank account on a regular basis and at least within a week. Payments received in cash may be transferred to the petty cash float if required otherwise paid into the Board's bank account without delay. Payments may also be taken by debit or credit card, in person, by phone or on the Board's website or paid directly into the Board's bank account by the Debtor.
- 5.3 All payments received by which ever method shall be recorded in the collection and deposit book.
- 5.4 The Finance Manager shall have responsibility to ensure that all monies received are correctly recorded in the Board's accounting records and the correct amount of VAT is added to income accounts where applicable.
- 5.5 The Finance Manager shall keep the Board regularly informed on the level of drainage rates collected by inclusion of a report in the monthly reports sent to the Executive Committee and at each Board meeting.
- 5.6 An official receipt showing date of receipt, amount received, type of remittance and reason for payment will be issued for all cash payments and for cheque payments on request.

- 5.7 Keys to the safe and cash boxes shall only be available to designated officers. Any lost keys must be immediately reported to the Chief Executive and Finance Manager.

6. INSURANCE

- 6.1 The Finance Manager, in consultation with responsible Officers initiates all appropriate insurance cover and negotiates all claims in consultation with relevant Officers.
- 6.2 All policies and covers are to be reviewed on an annual basis.
- 6.3 The Finance Manager shall inform the Insurer in a manner and at intervals requested by the Insurer, of all asset changes and cover required.
- 6.4 Officers shall promptly notify the Finance Manager of any loss, liability or damage or any event likely to lead to a claim on any Board policy.

7. STOCK AND ASSETS

- 7.1 The Finance Manager shall receive a weekly stock list from the Operations Manager detailing issues, receipts and balances of stock items.
- 7.2 The Finance Manager will arrange a physical stock take at least twice a year with one coinciding with the financial year end on the 31st March.
- 7.3 The Operations Manager shall ensure proper and safe custody of all stock.
- 7.4 The Finance Manager shall keep an asset register. This shall record all assets above £5,000 in value. The Finance Manager will carry out at least an annual physical check of assets.
- 7.5 Obsolete Equipment will, on the agreement of the Finance Manager and Chief Executive, be offered to the primary user at the best trade in rate achievable plus one pound and then to other staff via sealed bid. If not purchased by staff then, if appropriate and suitable, it can be traded in or sold by any other means for the benefit of the Board.

8. PAYMENT TO EMPLOYEES

- 8.1 The Finance Manager shall keep a record of all employees to show details of the appointment, grade and payments in respect of each employee of the Board.
- 8.2 The Finance Manager shall be responsible for the payment of all, salaries, wages and other emoluments to all employees.
- 8.3 The Finance Manager shall be responsible for keeping and maintaining all records for the proper administration of PAYE, NI and Superannuation.
- 8.4 All authorised officers shall notify the Chief Executive and Finance Manager immediately of all matters affecting payments including resignations, suspensions, absences from duty and changes in remuneration.

- 8.5 Variations to the salary of the Chief Executive or Finance Manager shall be authorised by the Executive Committee and Chairperson of the Board.
- 8.6 Any discretionary payments to employee's over the Overtime limit will be authorised by the Chairperson of the Board.

9. TREASURY MANAGEMENT / BANKING ARRANGEMENTS

- 9.1 The Finance Manager shall include in the monthly management accounts details on all investments which will be distributed to the Executive Committee.
- 9.2 The Board has a limit of funds that may be deposited, in a fixed term investment, with any institution which is £300,000.
- 9.3 The Board only places deposits with financial institutions which are regulated by the Financial Conduct Authority.
- 9.4 Bank transactions and instructions must be authorised by two approved officers.
- 9.5 In relation to 9.4 above, the approved officers are: Chief Executive, Finance Manager, Finance Supervisor and Operations Manager.
- 9.6 The Chief Executive and Finance Manager may hold a Business Chargecard, with a monthly limit of £5,000 for payment of expenses and Internet orders. The Operations Manager may hold a business Chargecard, with a monthly limit of £2,500. Statements are to be certified by the Finance Manager every month. Chief Executive to certify the Finance Manager's statement. It is the bearers responsibility to ensure the cards are kept safe and only used in accordance with the Board's Procurement Policy. Under no circumstances are the cards to be used to withdraw cash.
- 9.7 Small payments may be made by petty cash under the control of the Finance Supervisor. All petty cash claims are to be recorded on a voucher supported by a receipt and authorised by the Finance Manager or Chief Executive. The maximum amount of petty cash that may be held is £500. The Finance Manager is to certify the analysis every month.
- 9.8 Bank accounts must be in the name of Black Sluice IDB.

10. RESERVES

- 10.1 General Reserve - When producing budgets and estimates the long term aim of the Board is;
- ~~a) to maintain the Board's general reserves above the target of 30% of annual expenditure (agreed by the Board on 23 November 2021);~~
- ~~b) to achieve a balanced budget in the long term reporting period.~~
- **Maintain** - Maintain the General Reserve at between three and twelve months of net revenue expenditure. (As per JPAG Practitioners Guide)
 - **Aim** - Aim to be able to fund a minimum of two consecutive "Wet" years of Electricity from the General Reserve.
 - **Budget** - With the General Reserve at the target level aim for a balanced budget.

11. AUDIT AND ACCOUNTS

- 11.1 The Finance Manager shall arrange for an internal audit of the accounting, financial management and other operations of the Board. This will be undertaken by a suitably qualified and experienced internal auditor and be undertaken in accordance with the Governance & Accountability for Smaller Authorities in England code of audit practice.
- 11.2 The Internal Auditor shall produce an annual report to the Executive Committee and the Audit & Risk Committee that assures them that the Board has a sound system of internal control which;
- 11.2.1 Facilitates the effective exercise of its function and the achievement of its aims and objectives
- 11.2.2 Ensures that the financial and operation management of the authority is effective and
- 11.2.3 Includes effective arrangements for the management of risk.
- 11.3 Any qualified or adverse internal or external audit reports or opinions will be reported to the next available Board meeting.
- 11.4 The Annual Financial Statements shall be approved by the Board before the 30th June each year.

12. IRREGULARITIES / FRAUD

- 12.1 In any case where irregularity is suspected in connection with financial or accounting transactions, it shall be the duty of the Finance Manager to inform the Chief Executive, Chairperson of the Board, and the Board's Auditor without delay.

Black Sluice Internal Drainage Board

Policy No: 4

Procurement Policy

Review Dates:

A&R Reviewed	25 April 2023
Board Approved	

1 INTRODUCTION

The Board approve an annual budget in February for all expenditure by the Board. Items of expenditure are discussed and approved by the Executive Committee, the Works Committees and the Board.

There has been a culture of the Board approving major items of expenditure which brings with it value for money.

2 THE PROCUREMENT PROCESS

Whatever the cost of an item or service that the Board purchases the following process is followed through to payment of that item: -

- 2.1 A Board order form must always be completed for any purchase made by the Board, except for purchases made using the internet or for items purchased by the Woldmarsh Group.
- 2.2 The following people are authorised to be issued with order books:
 - (a) Chief Executive
 - (b) Finance Manager
 - (c) Operations Manager
 - (d) Works Manager
 - (e) Pump Engineer
 - (f) Works Supervisor
 - (g) Fitter
 - (h) Unimog Driver
 - (i) Admin Office (under supervision of Finance Supervisor)
- 2.3 The order form should be filled out at the time of order and signed by the person who is organising the order and countersigned as required.
- 2.4 The Management Team is the Chief Executive, Finance Manager, Operations Manager and Works Manager.
- 2.5 The order is given to the supplier with, where possible, the agreed price of the item or service.
- 2.6 The green copy of the order form is given to the Finance Assistant. If additional quotations for the goods have been obtained then these should be noted on this copy.

- 2.7 When a delivery note is obtained this should be given to the Finance Assistant.
- 2.8 When the Finance Assistant receives an invoice for the goods they are to attach the order and the delivery note to this.
- 2.9 The invoice is approved by the Finance Manager before payment is made.
- 2.10 A report is made to every Board Meeting of the invoices paid by the Board.

3 BASIS OF PROCUREMENT POLICY

3.1 The policy sets out guidelines for procurement for four bands of expenditure:-

- Greater than **£20,000**
- Between £2,000 and **£20,000**
- Between £500 and £2,000
- Below £500

3.2 The Policy for Delegation of Authority gives the following authorities:

- (a) Executive Committee to approve any item of expenditure up to a value of £40,000.
- (b) The Chief Executive or Finance Manager to approve expenditure up to a value of £10,000 which is included in annual estimates and regular budgeted expenditure (e.g. electricity) in excess of £10,000.

4 PROCUREMENT POLICY

4.1 **Items with a value greater than £20,000**

These items will typically be:

- Large items of plant
 - Machinery and electrical equipment for pumping stations
 - Substantial repair contracts
 - Large contracts
 - Insurance policies
 - Large amounts of pipes, steel piles and other materials for stock
- (a) These items will be included in the annual budgeted expenditure and through this method the expenditure will be approved by the Board.
 - (b) Three quotations should be obtained and the lowest bona fide quotation should be accepted, should less than three quotations be obtained or other than the lowest is to be accepted, then the matter should be referred to the Executive Committee, by email in the first instance and later confirmed in a meeting of the committee.
 - (c) In the case of an emergency where it is not possible to obtain alternative quotations the Chairperson or the Vice Chairperson of the Board shall authorise the purchase.

4.2 Items between £2,000 and £20,000

These items will typically be:

- Items of new plant
 - Large repairs to plant
 - Repairs to equipment at pumping stations
 - Purchase of pipes, steel sheet piles and other construction equipment for stock.
 - Items of office equipment
 - Consultancy services
 - Contracts for maintenance works
 - Monthly payments to electricity companies.
- (a) Quotations will be obtained for items of new plant, office equipment, consultancy services and contracts for maintenance works. These will be approved by the Executive Committee before procurement, unless these have been approved within the annual budgets when the Finance Manager or Chief Executive will approve the expenditure.
- (b) Repairs of plant and pumping station equipment need to be progressed without delay and will normally be carried out by contractors or suppliers who regularly carry out work for the Board. The Finance Manager or Chief Executive shall approve this expenditure and this will be reported to the Executive Committee as part of the monthly Accounts Analysis sent to members by Email.
- (c) Regular purchases of equipment, materials and services agreed in a scheme of work or for maintenance operations will be approved by the Operations Manager or Works Manager, within the constraints of the budgets set and agreed by the Board/Executive Committee. Where possible, three quotations are to be obtained and the best value will be chosen.
- (d) Some monthly utility payments, particularly electricity bills, will be included in this category. These payments will be approved by the Finance Manager and Chief Executive. Best value for money is achieved by using a broker to negotiate annual, 2 year or 3 year contracts with the electricity supply companies.

4.3 Items between £500 and £2,000

These items will typically be:

- Purchase of small items of plant
 - Hire of plant and machinery
 - Repairs to plant and machinery
 - Purchase of spare parts for machinery
 - Material for construction materials.
 - Computers and office equipment
- (a) Where possible three quotations are to be obtained and authorisation to issue the order is to be sought from a member of the management team before signing an order for this level of procurement within the constraints of the budgets set and agreed by the Board/Executive Committee.

- (b) The Pump Engineer shall after obtaining three quotations, where possible, have the authorisation to sign an order for this level of procurement when associated with pumping station equipment within the constraints of the budgets set and agreed by the Board/Executive Committee.

4.4 Items below £500

These items or services are typically spare parts for machinery, office materials and other similar goods.

If possible, value for money will be achieved by obtaining at least one other quotation or by comparing the price with previous purchases of similar goods or services. It is accepted that small incidental purchases will be purchased from the most appropriate local supplier and this is to be noted on the carbon copies of the order.

5 ITEMS PURCHASED BY CREDIT CARD

- 5.1 Credit cards have been issued to the Chief Executive, Finance Manager and Operations Manager for use in purchasing goods and services for the Board.
- 5.2 Payments made by credit card will be reviewed by the management team on a receipt of the card statements. Receipts for all payments are to be reconciled to the statements and no one officer should review their own expenditure.
- 5.3 These purchases will be subject to the same guidelines as normal purchases, whenever possible.

6 ITEMS PURCHASED BY WOLDMARSH GROUP

- 6.1 The Board has become a member of the Woldmarsh Buying Group which works on behalf of its members to procure goods and services at preferential prices.
- 6.2 If goods or services are required a member of staff, authorised in para 2.2 above to be issued an order book, will contact Woldmarsh who will procure the items on behalf of the Board within the authorised limits for the individual. An official Board order form will be completed as above to include the agreed prices and the analysis for the accounts.
- 6.3 As soon as Woldmarsh have completed an order to the suppliers a confirmation of the order is sent to the Operations Manager, Finance Manager and Chief Executive Officer for review and oversight.
- 6.4 Woldmarsh submit an invoice for payment once per month for all of the goods and services purchased for the Board, analysis of this invoice is to be reported to the Board at each meeting.

7 SCAPE ACCESS AGREEMENT FOR THE PUBLIC SECTOR

- 7.1 The Board has signed up to a Scape Access Agreement. The Agreement sets out the rules which govern how the authority may use the framework and details the responsibilities undertaken by Scape and the authority. Full details of an Access Agreement can be found at Appendix 1 (Scape Access Agreement for the Public Sector Compliance and Guidance Note).

8 SUMMARY

- 8.1 The above policy is not exhaustive and is written as a guide to the appropriate level of authorisation for the level of procurement required.
- 8.2 Members of staff should always liaise with members of the management team to ensure that procurement of materials and services give satisfactory value for money.
- 8.3 Staff should look for every opportunity to make bulk purchases with other authorities to achieve additional value for money.
- 8.4 Consideration is always to be given in relation to maintaining expenditure within budgets. If budgets have been, or are likely to be, exceeded for a particular scheme or general maintenance then the authorisation of the Chief Executive Officer or the Finance Manager is to be sought before the order is placed.



ACCESS AGREEMENT

FOR THE PUBLIC SECTOR

COMPLIANCE AND GUIDANCE NOTE



INTRODUCTION

Public sector bodies (such as local authorities, central government departments, NHS trusts, schools and other educational establishments which are majority public funded) must comply with public procurement rules when they enter into contracts for supplies, works or services. The overall rules post Brexit for England, Wales and Northern Ireland are currently set out in the Public Contracts Regulations 2015; in Scotland, the Public Contracts (Scotland) Regulations 2015.

The rules mean that to discharge their transparency obligations, public sector bodies (contracting authorities) must advertise on the UK Government's "Find a Tender Service" (FTS) when they want to contract with a provider for works, goods or services and the value of that contract is above a specified value. There are strict procedures with which contracting authorities must comply when choosing a provider.

However, the rules do allow for a contracting authority to go through a procurement process to choose one or more providers to provide supplies, works or services on a framework. In other words, the procurement process is not to choose a provider for a specific project: It is to choose providers with the required levels of experience, quality and financial standards and who provide the best value (in terms of how they meet the specifications that will be required for projects under the framework and price).

When the contracting authority needs a provider for a specific project of a type covered by the framework, it can choose a provider on that framework for the project without having to carry out a full procurement process. It can call off the works/services required under the Framework Agreement.

The rules also provide that a contracting authority can act as a central purchasing body by entering into Framework Agreements which can be used by other contracting authorities.

Scape has procured and entered into a number of Framework Agreements. Contracting authorities are able, in principle, to use Scape's Framework Agreements to call off works/services from the framework providers.

Each Framework Agreement (which is entered into by Scape and the framework provider) sets out the rules for operating the relevant framework, as between Scape and the framework provider.

The framework provider enters into an individual project agreement with each contracting authority which wants to engage that provider to carry out works/services on a specific project. There is a "model" format of the delivery agreement set out in each Framework Agreement.

WHAT IS AN ACCESS AGREEMENT?

An Access Agreement is entered into by Scape and each contracting authority wanting to use a Scape framework. The Agreement sets out the rules which govern how the authority may use the framework and details the responsibilities undertaken by Scape and the authority.

WHAT DOES THE ACCESS AGREEMENT INVOLVE?

In summary, the Access Agreement sets out:

- The procedure the client must use if it wants to call off services under a Framework Agreement;
- What information Scape will provide to the client;
- The reporting information the client must provide to Scape if it calls off services under a Framework Agreement;
- How the Scape fee charged to the framework provider works;
- Warranties from each party;
- Limits on each party's liability;
- Confidentiality obligations;

The term of the Access Agreement and how it can be terminated by either party;

Various standard provisions (e.g. the governing law of the agreement, the way in which the parties communicate with each other).



WHY DO YOU NEED TO SIGN AN ACCESS AGREEMENT?

Once signed, the Access Agreement enables access to any of Scape's frameworks and you will receive detailed information about the frameworks and how to use them. The Access Agreement only needs to be signed once on behalf of an organisation and it carries no cost.

There is no commitment or obligation to use Scape's Frameworks once an Access Agreement has been signed. Signing an Access Agreement does not prohibit you from procuring a contract through any other route.

WHAT HAPPENS NEXT?

A representative from Scape, or the delivery partner (framework provider) you have selected, will contact you to discuss your requirements. They will provide you with information regarding the framework and processes, Project Request Form, Project Order Form and Delivery Agreement, together with supporting information about the NEC contracts, which are incorporated into Delivery Agreements.

[For the public sector | Access Agreement guidance note](#)

FREQUENTLY ASKED QUESTIONS

WHO DELIVERS SCAPE FRAMEWORKS?

Frameworks are available in all areas of England, Scotland, Wales and Northern Ireland. They are all delivered by our delivery partner(s) who are experts in their field and have been awarded their Framework Agreement following a competitive tender. Our delivery partner(s) form strong regional teams to focus on local delivery from within the community.

Learn more about our frameworks: www.scape.co.uk/for-the-public-sector **WHO**

DO WE WORK FOR?

Frameworks are available to every kind of public body. If you are a local authority, school, academy, college, university, blue light service, NHS organisation, armed force or substantially funded by the public purse, you can benefit with Scape.

WHY USE SCAPE?

For over a decade, we have developed and managed highly successful frameworks. By bringing together the strongest delivery teams, Scape achieves measurable time, cost, quality and community benefits on every project. We have shaped an environment of collaboration and innovation, directly supporting our clients' need to achieve the highest possible standards.



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Vat Registration No. 877 9484 43

Black Sluice Internal Drainage Board

Policy No: 23

Display Screen Equipment Policy

Review Dates:

Original Issue	9 th April 2014
Board Approved	

1 INTRODUCTION

- 1.1 The Health and Safety (Display Screen Equipment) Regulations 1992 apply to workers who use DSE daily, for an hour or more at a time. We describe these workers as 'DSE users'. The regulations don't apply to workers who use DSE infrequently or only use it for a short time.
- 1.2 Incorrect use of DSE or poorly designed workstations or work environments can lead to pain in necks, shoulders, backs, arms, wrists and hands as well as fatigue and eye strain. The causes may not always be obvious.
- 1.3 The purpose of this policy, is to state who is responsible and what they must do in order to minimise any possible health and safety risks to users which are associated with display screen equipment work.

2 MANAGER RESPONSIBILITIES

- 2.1 You must ensure that for all users, for which you have responsibility, a Health and Safety Executive DSE workstation assessment is carried out and a record kept in the 'Display Screen Equipment' section of the Health and Safety files. In practice this means that there will be a completed HSE workstation assessment form for each DSE user.
- 2.2 DSE Workstation Assessments should be carried out in conjunction with the user so as to provide training.
- 2.3 You must progress reasonable requests from users for any items identified as a result of carrying out the DSE workstation assessment and, which will significantly reduce any ill effects associated with DSE work.
- 2.4 DSE users should have an eye and eyesight test every two years and you must arrange for this to be undertaken and the costs of the eye and eyesight test reimbursed.
- 2.5 The Board will contribute a maximum contribution of £200 in any 2 year period to those prescribed normal corrective appliances to undertake DSE work.

3 DSE USER RESPONSIBILITIES

- 3.1 You must co-operate with your manager and assist them in carrying out the DSE workstation assessment detailed above.
- 3.2 You must notify your manager if you become aware of any ill effects associated with your DSE work so that the DSE workstation assessment may be reviewed.

Appendix A – DSE Assessment

Display screen equipment (DSE) workstation checklist



This is a web-friendly version of *Display screen equipment (DSE) workstation checklist* published 05/13

Workstation location and number (if applicable):

User:

Checklist completed by:

Assessment checked by:

Any further action needed: **Yes/No**

Follow-up action completed on:

The following checklist can be used to help you complete a risk assessment and comply with the Schedule to the Health and Safety (Display Screen Equipment) Regulations 1992 as amended by the Health and Safety (Miscellaneous Amendments) Regulations 2002.

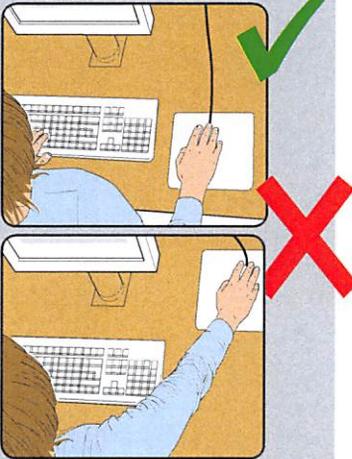
The questions and 'Things to consider' in the checklist cover the requirements of the Schedule. If you can answer 'Yes' in the second column against all the questions, having taken account of the 'Things to consider', you are complying. You will not be able to address some of the questions and 'Things to consider', eg on reflections on the screen, or the user's comfort, until the workstation has been installed. These will be covered in the risk assessment you do once the workstation is installed.

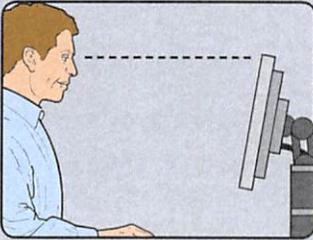
Work through the checklist, ticking either the 'Yes' or 'No' column against each risk factor:

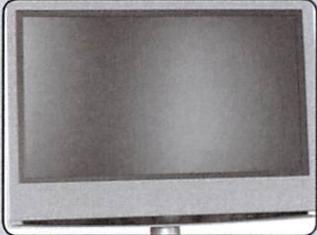
- 'Yes' answers require no further action.
- 'No' answers will require investigation and/or remedial action by the workstation assessor. They should record their decisions in the 'Action to take' column. Assessors should check later that actions have been taken and have resolved the problem.

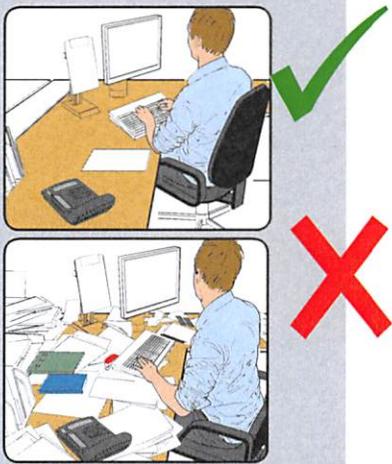
Remember, the checklist only covers the workstation and work environment. You also need to make sure that risks from other aspects of the work are avoided, eg by giving users health and safety training, and providing for breaks or changes of activity. For more advice on these see *Working with display screen equipment (DSE): A brief guide*.

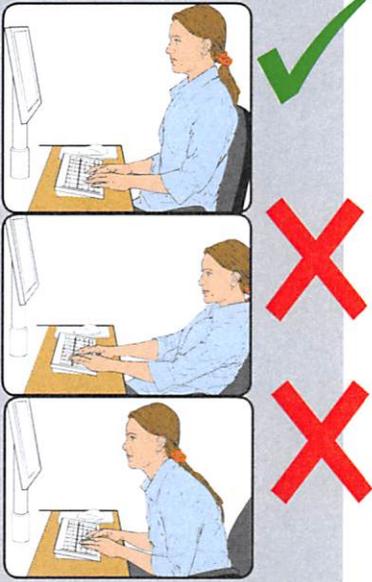
Risk factors	Tick answer		Things to consider	Action to take
	Yes	No		
1 Keyboards				
Is the keyboard separate from the screen?			This is a requirement, unless the task makes it impracticable (eg where there is a need to use a portable).	
Does the keyboard tilt?			Tilt need not be built in	
<p>Is it possible to find a comfortable keying position?</p> 			<p>Try pushing the display screen further back to create more room for the keyboard, hands and wrists.</p> <p>Users of thick, raised keyboards may need a wrist rest.</p>	
Does the user have good keyboard technique?			<p>Training can be used to prevent:</p> <ul style="list-style-type: none"> ■ hands bent up at the wrist; ■ hitting the keys too hard; ■ overstretching the fingers. 	
Are the characters clear and readable?			<p>Keyboards should be kept clean. If characters still can't be read, the keyboard may need modifying or replacing.</p> <p>Use a keyboard with a matt finish to reduce glare and/or reflection.</p>	

Risk factors	Tick answer		Things to consider	Action to take
	Yes	No		
2 Mouse, trackball etc				
Is the device suitable for the tasks it is used for?			If the user is having problems, try a different device. The mouse and trackball are general-purpose devices suitable for many tasks, and available in a variety of shapes and sizes. Alternative devices such as touch screens may be better for some tasks (but can be worse for others).	
Is the device positioned close to the user? 			Most devices are best placed as close as possible, eg right beside the keyboard. Training may be needed to: <ul style="list-style-type: none"> ■ prevent arm overreaching; ■ encourage users not to leave their hand on the device when it is not being used; ■ encourage a relaxed arm and straight wrist. 	
Is there support for the device user's wrist and forearm?			Support can be gained from, for example, the desk surface or arm of a chair. If not, a separate supporting device may help. The user should be able to find a comfortable working position with the device.	
Does the device work smoothly at a speed that suits the user?			See if cleaning is required (eg of mouse ball and rollers). Check the work surface is suitable. A mouse mat may be needed.	
Can the user easily adjust software settings for speed and accuracy of pointer?			Users may need training in how to adjust device settings.	

Risk factors	Tick answer		Things to consider	Action to take
	Yes	No		
3 Display screens				
<p>Are the characters clear and readable?</p> <div style="border: 1px solid blue; border-radius: 10px; padding: 5px; width: fit-content; margin: 5px 0;">Health and safety</div> <div style="border: 1px solid red; border-radius: 10px; padding: 5px; width: fit-content; margin: 5px 0;">Health and safety</div>			<p>Make sure the screen is clean and cleaning materials are available.</p> <p>Check that the text and background colours work well together.</p>	
Is the text size comfortable to read?			Software settings may need adjusting to change text size.	
Is the image stable, ie free of flicker and jitter?			<p>Try using different screen colours to reduce flicker, eg darker background and lighter text.</p> <p>If there are still problems, get the set-up checked, eg by the equipment supplier.</p>	
Is the screen's specification suitable for its intended use?			For example, intensive graphic work or work requiring fine attention to small details may require large display screens.	
Are the brightness and/or contrast adjustable?			Separate adjustment controls are not essential, provided the user can read the screen easily at all times.	
<p>Does the screen swivel and tilt?</p> 			<p>Swivel and tilt need not be built in; you can add a swivel and tilt mechanism.</p> <p>However, you may need to replace the screen if:</p> <ul style="list-style-type: none"> ■ swivel/tilt is absent or unsatisfactory; ■ work is intensive; and/or ■ the user has problems getting the screen to a comfortable position. 	

Risk factors	Tick answer		Things to consider	Action to take
	Yes	No		
<p>Is the screen free from glare and reflections?</p> 			<p>Use a mirror placed in front of the screen to check where reflections are coming from.</p> <p>You might need to move the screen or even the desk and/or shield the screen from the source of the reflections.</p> <p>Screens that use dark characters on a light background are less prone to glare and reflections.</p>	
<p>Are adjustable window coverings provided and in adequate condition?</p>			<p>Check that blinds work. Blinds with vertical slats can be more suitable than horizontal ones.</p> <p>If these measures do not work, consider anti-glare screen filters as a last resort and seek specialist help.</p>	
<h4>4 Software</h4>				
<p>Is the software suitable for the task?</p>			<p>Software should help the user carry out the task, minimise stress and be user-friendly.</p> <p>Check users have had appropriate training in using the software.</p> <p>Software should respond quickly and clearly to user input, with adequate feedback, such as clear help messages.</p>	

Risk factors	Tick answer		Things to consider	Action to take
	Yes	No		
5 Furniture				
<p>Is the work surface large enough for all the necessary equipment, papers etc?</p> 			<p>Create more room by moving printers, reference materials etc elsewhere.</p> <p>If necessary, consider providing new power and telecoms sockets, so equipment can be moved.</p> <p>There should be some scope for flexible rearrangement.</p>	
<p>Can the user comfortably reach all the equipment and papers they need to use?</p>			<p>Rearrange equipment, papers etc to bring frequently used things within easy reach.</p> <p>A document holder may be needed, positioned to minimise uncomfortable head and eye movements.</p>	
<p>Are surfaces free from glare and reflection?</p>			<p>Consider mats or blotters to reduce reflections and glare.</p>	
<p>Is the chair suitable?</p> <p>Is the chair stable?</p> <p>Does the chair have a working:</p> <ul style="list-style-type: none"> ■ seat back height and tilt adjustment? ■ seat height adjustment? ■ castors or glides? 			<p>The chair may need repairing or replacing if the user is uncomfortable, or cannot use the adjustment mechanisms.</p>	

Risk factors	Tick answer		Things to consider	Action to take
	Yes	No		
<p>Is the chair adjusted correctly?</p> 			<p>The user should be able to carry out their work sitting comfortably.</p> <p>Consider training the user in how to adopt suitable postures while working.</p> <p>The arms of chairs can stop the user getting close enough to use the equipment comfortably.</p> <p>Move any obstructions from under the desk.</p>	
<p>Is the small of the back supported by the chair's backrest?</p>			<p>The user should have a straight back, supported by the chair, with relaxed shoulders.</p>	
<p>Are forearms horizontal and eyes at roughly the same height as the top of the DSE?</p>			<p>Adjust the chair height to get the user's arms in the right position, and then adjust the DSE height, if necessary.</p>	
<p>Are feet flat on the floor, without too much pressure from the seat on the backs of the legs?</p>			<p>If not, a footrest may be needed.</p>	

Risk factors	Tick answer		Things to consider	Action to take
	Yes	No		
6 Environment				
Is there enough room to change position and vary movement?			<p>Space is needed to move, stretch and fidget.</p> <p>Consider reorganising the office layout and check for obstructions.</p> <p>Cables should be tidy and not a trip or snag hazard.</p>	
Is the lighting suitable, eg not too bright or too dim to work comfortably?			<p>Users should be able to control light levels, eg by adjusting window blinds or light switches.</p> <p>Consider shading or repositioning light sources or providing local lighting, eg desk lamps (but make sure lights don't cause glare by reflecting off walls or other surfaces).</p>	
Does the air feel comfortable?			<p>DSE and other equipment may dry the air.</p> <p>Circulate fresh air if possible. Plants may help.</p> <p>Consider a humidifier if discomfort is severe.</p>	
Are levels of heat comfortable?			<p>Can heating be better controlled? More ventilation or air conditioning may be required if there is a lot of electronic equipment in the room. Or, can users be moved away from the heat source?</p>	
Are levels of noise comfortable?			<p>Consider moving sources of noise, eg printers, away from the user. If not, consider soundproofing.</p>	

7 Final questions to users...

- Has the checklist covered all the problems they may have working with their DSE?
- Have they experienced any discomfort or other symptoms which they attribute to working with their DSE?
- Has the user been advised of their entitlement to eye and eyesight testing?
- Does the user take regular breaks working away from DSE?

Write down the details of any problems here:

Further information

Working with display screen equipment (DSE): A brief guide Leaflet INDG36(rev4)
HSE books 2013 www.hse.gov.uk/pubns/indg36.htm

For information about health and safety visit <https://books.hse.gov.uk> or <http://www.hse.gov.uk>. You can view HSE guidance online and order priced publications from the website. HSE priced publications are also available from bookshops.

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This guidance is issued by the Health and Safety Executive. Following the guidance is not compulsory, unless specifically stated, and you are free to take other action. But if you do follow the guidance you will normally be doing enough to comply with the law. Health and safety inspectors seek to secure compliance with the law and may refer to this guidance.

Black Sluice Internal Drainage Board

Policy No: 25

Lone Worker Policy

Review Dates:

Original Issue	9 th April 2014
Board Approved	

1 INTRODUCTION

- 1.1 Working alone is not in itself against the law and it will often be safe to do so. However, the law requires employers to consider carefully, and then deal with, any health and safety risks for people working alone.
- 1.2 Employers are responsible for the health, safety and welfare at work of all their workers. They also have responsibility for the health and safety of any contractors or self-employed people doing work for them.
- 1.3 These responsibilities cannot be transferred to any other person, including those people who work alone.
- 1.4 Workers have responsibilities to take reasonable care of themselves and other people affected by their work activities and to co-operate with their employers in meeting their legal obligations.

2 REGULATIONS

- 2.1 The duties placed on employers and employees by the Health and Safety at Work etc Act 1974 and the Management of Health and Safety at Work Regulations 1999 are still applicable to lone workers. Employers have a requirement to identify the hazards presented by the work, the risks involved and the introduction of remedial measures to avoid or reduce the risk.
- 2.2 In accordance with the regulations mentioned above, Risk Assessments will be carried out by a competent person to identify the possible hazards before working alone, for example working below overhead cables, working adjacent to water, working with electricity, working in the open. The risk assessment will take into account foreseeable emergencies such as fire, equipment failure, ice, illness and accidents, as well as more job specific factors.
- 2.3 Persons will only be required to work alone if they are considered fit, healthy and competent to deal with the foreseeable risk and the precautions required for the job.
- 2.4 Management will maintain regular communication with the lone worker. In addition, the employee has the responsibility to keep in regular contact with their supervisor and to not take unnecessary risks in order to complete a job alone, this will be detailed within the risk assessment.

3 BOARD PROVIDED WORKER DEVICES

- 3.1 Any employee lone working will be issued with a mobile telephone that has the Peoplesafe Lone Worker Application (App) installed.
- 3.2 On commencement of work for the day the telephone is to be switched on, GPS location set to on ~~with GPS Trail~~ and the Man Down Function turned on in the Peoplesafe App, ~~the Peoplesafe App will automatically begin to log locations.~~
- 3.3 On commencement of lone working, ~~the user is to log an activity Amber-Alert is to be turned on~~ in the Peoplesafe App and a time the lone working is expected to be completed logged with the monitoring station.
- 3.4 On completion of lone working the ~~previously logged activity Amber-Alert~~ is to be completed. ~~A warning that the timed session is about to end will be received, from there it can be cancelled, or the session extended.~~
- 3.5 ~~If the time on the logged activity runs out, with no further action as outlined in 3.4, an alarm will automatically be triggered.~~

~~If an Amber-Alert is not completed the monitoring station will escalate as follows;~~

- ~~a) Try to contact the employee to check on their welfare~~
- ~~b) If unable to contact escalate the Amber alert to a Red-Alert~~

- 3.6 The monitoring station will try to contact the employee to establish their welfare. If this should be unsuccessful they may activate the phones microphone to try and establish the situation to take appropriate further actions. In all cases the monitoring station will escalate to the Board's Officers in the following order;
 - a) Works Supervisor
 - b) Works & Engineering Manager
 - c) Operations Manager
 - d) Chief Executive
 - e) Finance Manager

~~If a Red-Alert The above course of action is activated by:~~

- ~~a) "Man Down" situation activated by the phones sensors and not cancelled~~
- ~~b) A panic alarm activated by pressing the power button a number of times 5 times (the number of times required to raise an alarm is at the discretion of the user and can be from four to ten times).~~
- ~~c) An escalation Amber-alert as per Para 3.5~~
- ~~d) Clicking the SOS Alarm on the app (requires 3 second press and hold)~~

Black Sluice Internal Drainage Board

Policy No: 32

Data Protection Policy

Review Dates:

Original Issue	16 th January 2013
Board Approved	

1 INTRODUCTION

- 1.1 The **European** General Data Protection Regulations (GDPR) **came** into effect on 25th May 2018 **and is replicated in the Data Protection Act 2018 (DPA)**.
- 1.2 The **DPA** applies to controllers and processors and applies to personal data, meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier, and sensitive personal data.
- 1.3 Sensitive personal data is personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. The only category that applies to Black Sluice IDB is in relation to the collection of Trade Union subscriptions and data relating to health from sick notes and occupational health.

2 LAWFUL BASIS FOR PROCESSING

- 2.1 **There is a** requirement to have a lawful basis in order to process personal data; the DPA places emphasis on being accountable for and transparent about the Board's lawful basis for processing.
- 2.2 The Board now needs to **regularly** review our processing, identify the most appropriate lawful basis, and check that it applies.
- 2.3 The Board, **as a public body**, need to consider the new 'public task' basis first for most of their processing, and **has** more limited scope to rely on consent or legitimate interests.
- 2.4 We can choose a new lawful basis if you find that your old condition for processing is no longer appropriate under the **DPA**, or decide that a different basis is more appropriate. The Board will be in breach of the **DPA** if we do not clearly identify the appropriate lawful basis (or bases, if more than one applies) from the start.

- 2.5 The **DPA brought** in new accountability and transparency requirements. The Board should therefore make sure it clearly documents the lawful basis so that it can demonstrate its compliance in line with **the DPA**.
- 2.6 The Board must now inform people upfront about the lawful basis for processing their personal data. **This is achieved by publishing the privacy notice on our website that can be found at appendix 2 to this policy.**
- 2.7 The lawful bases for processing are set out in **the DPA**. At least one of these must apply whenever **the Board** process personal data:
- (a) **Consent:** the individual has given clear consent for the Board to process their personal data for a specific purpose.
 - (b) **Contract:** the processing is necessary for a contract the Board has have with the individual, or because they have asked the Board to take specific steps before entering into a contract.
 - (c) **Legal obligation:** the processing is necessary for the Board to comply with the law (not including contractual obligations).
 - (d) **Vital interests:** the processing is necessary to protect someone's life.
 - (e) **Public task:** the processing is necessary for the Board to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
 - (f) **Legitimate interests:** the processing is necessary for the Boards legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

A register of data types held and the lawful basis to process this data is shown at Appendix 1.

3 INDIVIDUAL RIGHTS

- 3.1 The DPA provides the following rights for individuals:
- (a) **The right to be informed**
Individuals have the right to be informed about the collection and use of their personal data. This is a key transparency requirement under the **DPA**. The board achieves this by publishing the Privacy Notice at appendix 2.
 - (b) **The right of access**
Individuals have the right to access their personal data and supplementary information. The right of access allows individuals to be aware of and verify the lawfulness of the processing.

- (c) **The right to rectification**
The **DPA** includes a right for individuals to have inaccurate personal data rectified, or completed if it is incomplete. An individual can make a request for rectification verbally or in writing.
- (d) **The right to erasure**
The **DPA** introduces a right for individuals to have personal data erased. The right to erasure is also known as 'the right to be forgotten'. Individuals can make a request for erasure verbally or in writing. The right is not absolute and only applies in certain circumstances. For example, it does not apply for the performance of a task carried out in the public interest or in the exercise of official authority.
- (e) **The right to restrict processing**
Individuals have the right to request the restriction or suppression of their personal data. This is not an absolute right and only applies in certain circumstances. When processing is restricted, we are permitted to store the personal data, but not use it. An individual can make a request for restriction verbally or in writing.
- (f) **The right to data portability**
The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services. It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.
- (g) **The right to object**
Individuals have the right to object to processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling), direct marketing (including profiling) and processing for purposes of scientific/historical research and statistics. Details of how to object are included in our Privacy Notice at appendix 2.
- (h) **Rights in relation to automated decision making and profiling.**
The **DPA** has provisions on: automated individual decision-making (making a decision solely by automated means without any human involvement); and profiling (automated processing of personal data to evaluate certain things about an individual). Profiling can be part of an automated decision-making process. The **DPA** applies to all automated individual decision-making and profiling.

4 ACCOUNTABILITY AND GOVERNANCE

- 4.1 The **DPA** includes provisions that promote accountability and governance. These complement the **DPA**'s transparency requirements. While the principles of accountability and transparency have previously been implicit requirements of data protection law, the **DPA**'s emphasis elevates their significance. We are expected to put into place comprehensive but proportionate governance measures. Good practice tools that the ICO has championed for a long time such as privacy impact assessments and privacy by design are now legally required in certain circumstances.

Ultimately, these measures should minimise the risk of breaches and uphold the protection of personal data. Practically, this is likely to mean more policies and procedures for organisations, although many organisations will already have good governance measures in place.

4.2 **Documentation**

The **DPA** contains explicit provisions about documenting the Board's processing activities. We must maintain records on several things such as processing purposes, data sharing and retention. A register can be found at appendix 1.

The Board may be required to make the records available to the ICO on request. Records must be kept in writing. Records must be kept up to date and reflect our current processing activities.

4.3 **Data protection by design and default**

Under the **DPA**, the Board has a general obligation to implement technical and organisational measures to show that the Board has considered and integrated data protection into the Boards processing activities. Privacy by design has always been an implicit requirement of data protection that the ICO has consistently championed.

4.4 **Data protection impact assessments**

A data protection impact assessment (DPIA) is a process to help the Board identify and minimise the data protection risks of a project. The Board must do a DPIA for certain listed types of processing, or any other processing that is likely to result in a high risk to individuals' interests.

It is also good practice to do a DPIA for any other major project which requires the processing of personal data. To assess the level of risk, the Board must consider both the likelihood and the severity of any impact on individuals. High risk could result from either a high probability of some harm, or a lower possibility of serious harm.

This is not likely to apply to the Board but should be borne in mind.

4.5 **Data Protection Officer**

The **DPA** introduces a duty for the Board to appoint a data protection officer (DPO) as we are a public authority. DPOs assist to monitor internal compliance, inform and advise on data protection obligations, provide advice regarding Data Protection Impact Assessments (DPIAs) and act as a contact point for data subjects and the supervisory authority.

The DPO must be independent, an expert in data protection, adequately resourced, and report to the highest management level. A DPO can be an existing employee or externally appointed.

Daniel Withnall MCGI MInstLM FMAAT, Finance Manager and Responsible Financial Officer, is appointed as the Board's Data Protection Officer.

4.6 **Security**

The **DPA** requires personal data to be processed in a manner that ensures its security. This includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage. It requires that appropriate technical or organisational measures are used.

4.7 **Personal data breaches**

The **DPA** introduces a duty on all organisations to report certain types of personal data breach to the relevant supervisory authority. The Board must do this within 72 hours of becoming aware of the breach, where feasible. If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, the Board must also inform those individuals without undue delay.

The Board should ensure it has robust breach detection, investigation and internal reporting procedures in place. This will facilitate decision-making about whether or not you need to notify the relevant supervisory authority and the affected individuals. The Board must also keep a record of any personal data breaches, regardless of whether you are required to notify.

4.8 **Children**

It is not envisaged that the personal details of children will be processed and the DPO should be consulted if this becomes a requirement.

5 **DATA PROTECTION PRINCIPLES**

5.1 Black Sluice Internal Drainage Board fully endorses the eight data protection principles, adhering to them at all times.

These principles are:

- (a) Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met.
- (b) Personal data shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any way incompatible with that purpose or those purposes.
- (c) Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
- (d) Personal data shall be accurate and where necessary, kept up to date.
- (e) Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- (f) Personal data shall be processed in accordance with the rights of data subjects under **DPA**.
- (g) Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

- (h) Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedom of data subjects in relation to the processing of personal data.

5.2 **Black Sluice Internal Drainage Board's commitment to the Data Protection Principles**

Black Sluice Internal Drainage Board will do the following to comply with the principles:

- (a) Observe fully the conditions regarding the fair collection and use of information.
- (b) Meet its legal obligations to specify the purposes for which information is used.
- (c) Collect and process appropriate information and only to the extent that it is required to fulfil operational needs or to comply with any legal requirements.
- (d) Ensure the quality of information used.
- (e) Ensure that information held is erased at the appropriate time.
- (f) Ensure that the rights of individuals about whom we hold information can be exercised fully under **DPA**.
- (g) Take appropriate technical and organisational security measures to safeguard personal information.
- (h) Ensure that personal information is not transferred abroad without suitable safeguards.

5.3 **Black Sluice Internal Drainage Board adheres to its commitment to Data Protection by:**

- (a) Allocation of specific responsibility for data protection to at least one person known as the Data Protection Officer.
- (b) Ensure that employees handling personal information are supervised appropriately.
- (c) Requests for access to an individual's own personal information are dealt with in a timely and courteous manner.
- (d) Record any incidents of breach in data protection policy and keep a register.
- (e) Undertake regular review of management of personal information and update when necessary.

5.4 **Access to personal information**

For information about how to request subject access to personal information please contact: mailbox@blacksluiceidb.gov.uk

Controller			
Name and contact details		Data Protection Officer (if applicable)	
Name	Black Sluice Internal Drainage Board	Name	Daniel Withnall
Address	Station Road, Swineshead, Boston, Lincolnshire. PE20 3PW	Address	Black Sluice IDB, Station Road, Swineshead, Boston, Lincolnshire. PE20 3PW
Email	mailbox@blacksluiceidb.gov.uk	Email	Daniel.Withnall@Blacksluiceidb.gov.uk
Telephone	01205 821440	Telephone	01205 821440

Article 6(1)(a) - Consent	Article 9(2)(a) - Consent
Article 6(1)(b) - Contract	Article 9(2)(b) - employment
Article 6(1)(c) - legal obligation	
Article 6(1)(d) - Vital Interests	
Article 6(1)(e) - Public Task	
Article 6(1)(f) - Legitimate Interests	

Article 30 Record of Processing Activities

Business function	Purpose of processing	Name and contact details of joint controller (if applicable)	Categories of individuals	Categories of personal data	Categories of recipients	General description of technical and organisational security measures (if possible)	Article 6 lawful basis for processing personal data	Article 9 basis for processing special category data
Rating	Rating Records	N/A	Ratepayers	Contact details	Public (Electoral Register)		Article 6(1)(e) - Public Task	
Planning & Consenting	Planning Consultation	Boston Borough Council	Public	Contact Details	District/Borough Council	Encrypted storage and transfer	Article 6(1)(e) - Public Task	
Planning & Consenting	Planning Consultation	South Holland District Council	Public	Contact Details	District/Borough Council	Encrypted storage	Article 6(1)(e) - Public Task	
Planning & Consenting	Planning Consultation	North Kesteven District Council	Public	Contact Details	District/Borough Council	Encrypted storage	Article 6(1)(e) - Public Task	
Planning & Consenting	Planning Consultation	South Kesteven District Council	Public	Contact Details	District/Borough Council	Encrypted storage	Article 6(1)(e) - Public Task	
Planning & Consenting	Planning Consultation	Lincolnshire County Council	Public	Contact Details	County Council	Encrypted storage	Article 6(1)(e) - Public Task	
Planning & Consenting	Consent Application	N/A	Applicant	Contact Details	N/A	Encrypted storage	Article 6(1)(e) - Public Task	
Planning & Consenting	Consent Application in extended Area	Lincolnshire County Council	Applicant	Contact Details	N/A	Encrypted storage	Article 6(1)(e) - Public Task	
Finance	Payroll	N/A	Employees	Contact details	HMRC	Encrypted storage and transfer	Article 6(1)(c) - legal obligation	
Finance	Payroll	N/A	Employees	Bank details	HMRC	Encrypted storage and transfer	Article 6(1)(c) - legal obligation	
Finance	Payroll	N/A	Employees	Pension details	HMRC	Encrypted storage and transfer	Article 6(1)(c) - legal obligation	
Finance	Payroll	N/A	Employees	Tax details	HMRC	Encrypted storage and transfer	Article 6(1)(c) - legal obligation	
Finance	Sales	N/A	Customers	Contact details	N/A	Encrypted storage	Article 6(1)(b) - contract	
Finance	Purchase	N/A	Suppliers	Contact details	N/A	Encrypted storage	Article 6(1)(b) - contract	
Finance	Purchase	N/A	Suppliers	Bank details	N/A	Encrypted storage	Article 6(1)(b) - contract	
Human Resources	Personel file	N/A	Employees	Contact details	N/A	Encrypted storage, access controls	Article 6(1)(b) - contract	
Human Resources	Personel file	N/A	Employees	Pay details	N/A	Encrypted storage, access controls	Article 6(1)(b) - contract	
Human Resources	Personel file	N/A	Employees	Annual leave details	N/A	Encrypted storage, access controls	Article 6(1)(b) - contract	
Human Resources	Personel file	N/A	Employees	Sick leave details	N/A	Encrypted storage, access controls	Article 6(1)(b) - contract	Article 9(2)(b) - employment
Human Resources	Personel file	N/A	Employees	Performance details	N/A	Encrypted storage, access controls	Article 6(1)(b) - contract	
Human Resources	Personel file	N/A	Employees	Driver Declarations	N/A	Encrypted storage, access controls	Article 6(1)(b) - contract	Article 9(2)(b) - employment
Human Resources	Personel file	N/A	Employees	Occupational Health	N/A	Encrypted storage, access controls	Article 6(1)(b) - contract	Article 9(2)(b) - employment
Admin	Board Functions	N/A	Board Members	Contact Details	N/A	Encrypted storage	Article 6(1)(e) - Public Task	
Admin	Board Functions	N/A	Co-Opted Board Members	Contact Details	N/A	Encrypted storage	Article 6(1)(a) - Consent	

	<h1>Black Sluice Internal Drainage Board</h1>	<p>Station Road Swineshead Boston Lincolnshire PE20 3PW</p>
<p>www.blacksluiceidb.gov.uk</p>	<p>mailbox@blacksluiceidb.gov.uk</p>	<p>01205 821440</p>

PRIVACY NOTICE

At Black Sluice Internal Drainage Board, we're committed to protecting and respecting your privacy.

This Notice explains when and why we collect personal information about people, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Notice from time to time so please check occasionally to ensure that you're happy with any changes.

If you have any questions regarding this Notice and our privacy practices you can contact us using the details above.

Who are we?

The Black Sluice Internal Drainage Board is an authority set up to control water levels and reduce the risk of flooding within the Board's area. It operates 34 pumping stations and maintains 500 miles of watercourses within its area and has a policy of undertaking this work with regard to protecting and enhancing the environmental features in these watercourses.

Public Bodies dealing with drainage matters have a long history which stretches back to 1252, but most IDBs today were established by National Government following the passing of the Land Drainage Act 1930. The activities and responsibilities of the Boards are controlled by this and subsequent Land Drainage Acts, and other subordinate legislation.

How do we collect information from you?

In most cases information will be collected from you directly but the Board may, from time to time, use powers included in law to require information of others. The legal basis for obtaining this information will be assured and we will tell you how we obtained your personal information.

What type of information is collected from you?

The personal information we collect might include your name, contact details and details of any land you either own or occupy. If you make a payment to us using a card your card information is not held by us, it is collected by, or transmitted directly to in case of a phone payment, our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions. Cards details are never recorded or stored by Black Sluice IDB.

How is your information used?

We may use your information to:

- (a) Carryout Drainage Board Functions as per the Land Drainage Act 1991.
- (b) Process applications in relation to the Board's Byelaws.
- (c) Process applications on behalf of Lincolnshire County Council, the lead local flood authority, under Section 23 of the Land Drainage Act 1991.
- (d) Carry out our obligations arising from any contracts entered into by you and us.
- (e) Process a job application.

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

Who has access to your information?

We will not sell, rent or share your information with third parties for marketing purposes.

Third Party Service Providers working on our behalf: We may pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties for them to use for their own direct marketing purposes, unless we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

When you are using our secure online payment pages, your payment is processed by a third party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

How you can access and update your information

The accuracy of your information is important to us. If you change email address, or any of the other information we hold is inaccurate or out of date, please contact us using the details above.

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it's treated securely. Any sensitive information is encrypted and protected.

Non-sensitive details (your email address etc.) transmitted normally over the Internet, can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

Review of this Notice

We keep this Notice under regular review. This Notice was last updated in **April 2023**.

Black Sluice Internal Drainage Board

Policy No: 00

Health and Wellbeing

Review Dates:

Reviewed	
Board Approved	

1. INTRODUCTION

The Board has a duty of care requirement to look after the health and safety of employees, including their wellbeing. There are many factors that influence the health and wellbeing of staff. Understanding and overcoming these issues can result in a range of benefits for both individuals and the wider Board. This policy sets out the Board's commitment and arrangements for securing the health and wellbeing of staff.

2. POLICY AIMS & OBJECTIVES

- Provide a working environment that promotes and supports the physical health, mental health, and wellbeing of all employees.
- Raise awareness and provide guidance on issues relating to health and wellbeing.
- Encourage the adoption of a proactive approach to prevent and minimise the risks associated with poor health and wellbeing within the workforce.

3. DEFINITIONS

Health: '...a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity' (World Health Organisation).

Wellbeing: '...a state of being with others, where human needs are met, where one can act meaningfully to pursue one's goals, and where one enjoys a satisfactory quality of life' (Economic and Social Research Council).

4. RELEVANT LEGISLATION

- The Health and Safety at Work Act 1974
- The Management of Health and Safety at Work Regulations 1999
- Equality Act 2010

5. EXPECTATIONS

- Line managers should be open, welcoming, and friendly. They should invite the employee to regular private meetings and ask them to talk openly about any health problems (physical and mental). The line manager should not make presumptions about how the health problem is impacting on the employee personally and professionally.

- Any support required by the employee is likely to be known by the employee themselves. The Board actively encourages employees to be open and honest about their health and wellbeing and to inform their line manager of any issues at an early opportunity, to allow these to be addressed. There is also an expectation on all the Boards' employees to conduct themselves in a helpful and open-minded manner towards colleagues who are experiencing health problems.

6. INDICATORS (MENTAL HEALTH)

To prevent mental health problems escalating, early intervention is important. In many cases, obvious indicators that an employee is suffering from a mental health problem may not be present.

However, early signs may include:

- behavioural, mood or temperament changes, especially when communicating with others
- decrease in productivity and focus
- inability to make decisions and difficulty in problem solving
- showing signs of tiredness or being withdrawn and unable to take part in hobbies in which they usually participate
- reducing intake of food or increasing intake of alcohol, cigarettes etc.

The Board has invested in the provision of Mental Health First Aid courses, for nominated Mental Health First Aiders, designed to be able to better identify potential mental health problems and direct individuals to support.

7. SUPPORT

(a) Mental Health

Mind (a mental health charity) recommends that, where a mental health issue is identified, they should work alongside the employee to create a personal wellness action plan that provides for proactive management of their mental health. This will support ongoing open communication between line managers and employees and will result in mutually agreed steps being established that can be monitored on an ongoing basis.

A wellness action plan should cover:

- actions and measures that can support the employee's mental health
- symptoms and triggers for poor mental health
- the impact mental health problems have, or could have, on the employee's performances
- any workplace support required from their line manager or colleagues
- any positive actions the employee can take when suffering from poor mental health
- a review process to ensure the workplace support is having the required effect.

To ensure the plan meets the employee's requirements, it should be drafted by the employee themselves, with medical support as necessary, and then set in place with their line manager. Any information in the plan, and the plan itself, should be kept confidential and reviewed on an ongoing basis by both the employee and their line manager.

(b) Physical Exercise and Healthy Eating

The Board encourages employees to undertake regular physical activity:

- It's medically proven that people who do regular physical activity have lower risk of coronary heart disease and stroke, type 2 diabetes, bowel cancer, breast cancer in women, early death, osteoarthritis, hip fracture, falls (among older adults), depression and dementia.
- To stay healthy, the UK Chief Medical Officers' Physical Activity Guidelines, on GOV.UK, state that adults should try to be active every day and aim to do at least 150 minutes of physical activity over a week, through a variety of activities.

The Board encourages employees to eat healthily:

- A well-balanced diet provides all the energy needed to keep active throughout the day.
- It can contribute to mental health, for example, increasing levels of concentration and the ability to cope with everyday stresses.
- The Board's office is equipped with food storage and preparation area for lunchtime meals. There is also easy access to cold water.

(c) Workplace Adjustments

The Board has a duty to make reasonable adjustments where an employee has a disability (Equality Act 2010), as a means of enabling the employee to continue to carry out their role and to support any identified disadvantage being removed.

Whilst adjustments are unique to the individual's situation, some examples include:

- Acquiring or modifying equipment – e.g., adapted keyboards or telephone
- Providing training – to use specialist equipment
- Changing location to a more accessible office
- Altering hours of work i.e., to assist with travelling
- Reduced hours
- Providing reasonable adjustment to role responsibilities
- Reasonable adjustments to premises

The employee will be consulted fully on these. Once the adjustments are agreed, they will be reviewed on an ongoing basis to ensure they are having the required effect. The duty to make the adjustments is 'reasonable' so if the suggested adjustment is not viable it will not be made.

8. SOURCES OF EXTENRAL SUPPORT

- NHS Mental Health Services - <https://www.nhs.uk/nhs-services/mental-health-services/>
- Mind - <https://www.mind.org.uk/information-support/guides-to-support-and-services/seeking-help-for-a-mental-health-problem/where-to-start/>
- Campaign against living miserably (Calm) - <https://www.thecalmzone.net/>
- Samaritans - <https://www.samaritans.org/how-we-can-help/contact-samaritan/>
- NHS Exercise Guidelines - <https://www.nhs.uk/live-well/exercise/exercise-guidelines/>
- NHS Eat Well - <https://www.nhs.uk/live-well/eat-well/>

DRAFT

Black Sluice Internal Drainage Board

Policy No: 00

Sickness Absence Management

Review Dates:

Reviewed	
Board Approved	

1. INTRODUCTION

Employees may need to be absent from work, from time to time, due to sickness. This policy provides guidance for employees and their line managers in handling time off from work where the reason for absence is sickness.

2. POLICY AIMS & OBJECTIVES

- Provide a framework to support employees who are unable to work due to illness and assist them back to work as quickly as possible.
- Reduce the impact on other work colleagues when covering for colleagues who are absent.
- Secure the attendance of employees in order to minimise the cost and effects of sickness absence and to maximise operational efficiency in all areas.

3. EXPECTATIONS

- Line Managers are responsible for implementing this policy to ensure objectives are met.
- Line Managers have a structured framework to assist in managing sickness absence, with the aim of supporting employees back to work. This includes conducting return to work interviews after every period of absence, monitoring employee sickness in accordance with sickness triggers (it is the Board's right to adjust these trigger points annually to reflect sickness absence results) and referring staff to Occupational Health (OH) where appropriate.
- Line Managers will implement reasonable adjustments for employees, where applicable and appropriate, to enable/sustain attendance at work.
- Employees will be treated fairly, consistently, and sensitively during times of sickness and will be encouraged to use support mechanisms available to them.
- Employees understand their responsibilities and follow sickness reporting arrangements.
- The procedure aims to support an employee's return to work. Where employees are absent from work for a considerable amount of time they will be guided and supported whilst they are not at work, with the aim of supporting their return to work. All employees will have awareness that following application of policy and procedure, the outcome may be dismissal where a return to work is not practicable.

- Employees who are either underperforming or are no longer able to carry out the duties of their role due to their medical condition(s) will be managed through the Capability Policy and Procedure.

4. LINE MANAGER RESPONSIBILITIES

Line managers are responsible for managing absence issues sensitively and compassionately, ensuring they follow the procedure contained in this policy and associated documents; including:

- Ensuring employee sickness absence is notified to the Human Resource / Administration function to ensure information for the employee is accurate.
- Absences for dental / medical appointments / maternity leave or parental leave should not be recorded as sickness absence.
- Recording and monitoring all activities associated with managing the employee's absences. The record will be used by managers to evidence all support and communication, related to the absence, between the employee and themselves in a chronological order.
- Where absence results from a work-related accident or disease, this will be recorded in line with relevant requirements like RIDDOR and other HSE requirements.

5. EMPLOYEE RESPONSIBILITIES

Employees have a duty under their terms and conditions of employment to adhere to their responsibilities, including:

- Reporting and certification of sickness absence as per the procedure outlined within this policy.
- Employees must ensure medical advice and treatment is received as quickly as possible and are encouraged to follow all recommended medical advice or treatment in order to facilitate a prompt return to work.
- Employees are encouraged to attend any OH appointments, in accordance with their conditions of service. If employees do not attend these appointments or fail to give consent to release any completed OH assessment report, any decisions made regarding their absence from work will be made without the benefit of this information.
- Employees must ensure they are contactable and available to attend absence management meetings and respond in a timely manner to any communications from the Board. This will usually be at the employee's usual place of work, but if a home visit is necessary or more appropriate due to serious ill health or the employee being physically unable to attend work, this can be accommodated.
- Employees must advise their line manager of any changes to contact details occurring during an absence.
- Employees must advise their line manager of any concerns with their job/workplace, which they feel are making them ill or contributing to illness/absence.
- Employees wishing to take time off work who are not sick, must use annual or special leave or other approved leave. All leave of absence must be approved by their line manager. Other types of leave must not be used to avoid sickness absence.

- Employees may request to take accrued annual leave whilst on long term sickness. Employees are not expected to go away on holiday when absent due to sickness unless this is supported by a GP.
- Employees either at work or absent due to sickness should not undertake activities that could hinder or affect recovery. If it is found that employees are undertaking activities that would prevent recovery, this may be managed under the Disciplinary Policy.
- Employees are responsible for managing their sickness and for taking appropriate action, as determined by any health professional, to minimise any reoccurrence of the sickness.

6. TRIGGER POINTS

The Board operates the below trigger points:

- 4 or more episodes of absence in a rolling 12-month period and/or
- Equivalent of 2 working weeks of absence in a rolling 12-month period and/or
- Absences in a short period warranting immediate action, e.g., 3 episodes or 6 working days in 6 months.
- A pattern of absence causing concern, e.g., regular Friday or Monday absences or absences regularly occurring on a day/week, pre or post annual leave, school holidays, public holidays, pay day.

Only one of the triggers needs to be reached for the line manager to be required to review the employee's sickness records.

The line manager should meet informally with the employee to discuss the fact that an absence trigger has been reached and to discuss necessary actions, such as considering a referral to Occupational Health, implementing any possible reasonable adjustments that may be necessary in relation to disability, or any possible formal disciplinary action. The line manager may establish that there is an underlying medical condition, and it may be that HR advice is sought as to the best course of action to take. Disciplinary procedures may not be necessary or appropriate in those circumstances. A summary of the meeting should be kept for the employee's personnel file and a copy given to the employee.

7. NOTIFICATION & CERTIFICATION

As per the Association of Drainage Authorities Lincolnshire Branch, Wages and Salaries and Conditions of Service 'White Book':

An Employee obliged by illness or accident to be absent from duty must, by their normal start time on the first day of absence, inform the appropriate supervising officer by telephone only, of the nature of the illness or injury, the first day of sickness and the probable duration of the absence. 'Days of absence' are days when the Employee would normally have been at work.

If the absence continues beyond three days the Employee must, by no later than the fourth day, telephone the appropriate supervising officer again and confirm the probable duration of the absence.

To meet the requirements of the Statutory Sick Pay Regulations where the sickness lasts from four to seven days the Employee will complete and sign a sickness absence form on return to work covering the period from the fourth day of the sickness.

(‘Days of sickness’ include normal working days, Saturdays, Sundays, public and extra-statutory holidays, and rest days).

Where the sickness continues beyond seven days the Employee will then submit a doctor’s fit note by no later than the eighth calendar day.

Subsequent doctor’s fit notes must also be submitted by the Employee, covering the whole period of the sickness. The employer may in a particular case require doctor’s fit notes and sickness absence forms to be submitted at more frequent intervals.

Employees are expected to keep their line manager regularly updated with their health and expected date of returning to work.

Employees must continue to send in Fit Notes for the duration of the absence and keep line managers advised of their health and progress towards returning to work. When a Fit Note expires, employees not returning to work must ensure a new Fit Note is sent to their line manager immediately.

If the employee is unable to notify their line manager due to their sickness, then the recorded next of kin is permitted to notify the individual’s line manager of the absence. The employee is required to follow up that contact at the earliest opportunity. It is recognised there may be instances where employees or recorded next of kin are unable to contact line managers personally (e.g., admittance to hospital). In these exceptional circumstances the individual who contacts the line manager will leave a contact name and number.

Failure to follow the certification process outlined above may be considered misconduct and may be dealt with under the Board’s disciplinary process. Sick pay paid by the Board may be withheld during this time, Statutory Sick Pay would be paid as required by law on submission of the SC2 self-certification form for the first seven days (including non-working days) and a fit note for any period after 7 days, even if it was submitted late.

8. PRIVATE CERTIFICATION

An employee may be required by the Board, at any time during their employment, to submit to examination by a registered medical practitioner nominated by the Board. A registered medical practitioner or private fit note may be considered necessary by the Board if there is a history of unusual absences or if the line manager believes the employee may benefit from an intervention by a medical practitioner. The cost of obtaining a private fit note will be reimbursed by the Board. A private fit note may be requested by the Board, regardless of the duration of the actual period of sickness absence.

9. RETURNING TO WORK

In all circumstances, a return to work interview will be arranged by the line manager for the employee.

A fit note may make a recommendation for temporary changes to be made to an employee’s working environment or conditions to facilitate a return to work. The Board may require the employee to meet with a medical practitioner, of the Boards’ choosing, to have the fitness to work arrangements of the employee assessed and confirmed.

Where the fit note contains recommendations for changes to be made to working conditions or practices, the Board will consider those recommendations and try as far as possible to accommodate those changes, where permissible in accordance with the needs of the Board.

Where a fit note is marked as “may be fit for work” by the employee’s General Practitioner (GP), the GP usually sets out the possible alterations or amendments that could be made to the employee’s working practices to facilitate their fitness for work. Examples of the options available are:

- phased return to work
- amended duties
- altered hours
- workplace adaptations

A meeting will be arranged for the employee to meet with their line manager to discuss the arrangements recommended in their fit note and how best the Board can facilitate a return to work.

In the event that adjustments and amendments cannot be made, the employee will not be able to return to work and will need to remain on sickness absence. However, where adjustments and amendments can be facilitated, regular reviews will be undertaken with the employee to confirm that the changes made continue to be adequate. The changes should be temporary and should not be considered permanent changes to the terms and conditions of employment.

10. RETURN TO WORK INTERVIEWS

Return to work discussions will be conducted with employees after every episode of sickness absence. The return to work discussion should be recorded on a form (Return to Work Form), which will be maintained on the individual’s personnel record.

The return to work discussion may include:

- Identify any support mechanisms which will prove beneficial following a return to work. Discuss any issues which may be affecting the employee's ability to attend work.
- Monitor absence levels and where an employee absence(s) reaches the identified trigger points, to manage them accordingly.
- Consider reasonable adjustments for employees (where applicable), including discussing with the employee any advice given on a Fit Note. Managers will ensure they investigate any possible reasonable adjustments and undertake a risk assessment.
- Consider a phased return to work (where appropriate), following long term sickness absence.

11. EXCLUSION FROM BENEFITS IN SICKNESS NOT ARISING OUT OF EMPLOYMENT

As per the Association of Drainage Authorities Lincolnshire Branch, Wages and Salaries and Conditions of Service ‘White Book’:

An Employee suffering from sickness or incapacity due or attributable to:-

- (a) His own negligence or misconduct,*
- (b) An accident not arising out of nor in the course of their employment with the employer, and sustained in circumstances in which they have exposed themselves to undue risk of injury,*

shall not be entitled to any sick pay under this Sick Pay Scheme, except at the discretion of the employer.

12. EXCLUSION FROM BENEFIT WHEN OTHERWISE GAINFULLY OCCUPIED

As per the Association of Drainage Authorities Lincolnshire Branch, Wages and Salaries and Conditions of Service 'White Book':

An Employee who, at any time during any period for which they would otherwise be entitled to a sick pay under paragraph 7 (ADA White Book Section 6), is employed in another gainful occupation other than the occupation to which this Sick Pay Scheme applies, shall not be entitled to payment of sick pay for the period in which they are employed in that other occupation.

13. ACCIDENT - THIRD PARTY CLAIM

As per the Association of Drainage Authorities Lincolnshire Branch, Wages and Salaries and Conditions of Service 'White Book':

An Employee who is absent as a result of an accident shall not be entitled to any sickness allowance if damages may be receivable from a third party in respect of the accident. In this event the employer may, having regard to the circumstances of the case, advance to the Employee a sum not exceeding the sickness allowance provided under this Scheme, subject to the Employee's undertaking to refund to the employer the total amount of such allowance or the proportion of such allowance equivalent to the amount of the damages received. Where, in the opinion of the employer or Employee, the proportion of the advance required to be refunded is inequitable, the amount to be refunded shall be determined by mutual agreement; failure to reach agreement shall be dealt with under the local grievance or disputes procedure. Any period of absence in a case in which a refund of the monies advanced is made in full shall not be recorded for the purposes of this Scheme. Where, however, the refund is made in part only the employer may, at their discretion, decide to what extent, if any, the period of absence may be so recorded.

14. SICK PAY

As per the Association of Drainage Authorities Lincolnshire Branch, Wages and Salaries and Conditions of Service 'White Book':

Employees shall be entitled to receive contractual sick pay. Contractual sick pay is inclusive of any SSP that may be due for the same period. Contractual sick pay will be paid for any period of twenty-four consecutive months in accordance with the following scale:

Period of Continuous Service	Period of sick pay entitlement in Months	
	Full allowance	Half allowance
Less than 4 months	1	0
4 months to 1 year	1	2
=1 to 2 years	2	2
2 to 3 years	3	3
3 to 4 years	4	4
4 years or more	6	6

For the purpose of calculating the period of sick pay entitlement, a month shall be deemed to be 26 days excluding Sundays.

A week's pay for the purposes of calculating contractual sick pay shall include the Employee's basic pay and any compulsory overtime (guaranteed and non-guaranteed overtime) only averaged over a period of the preceding 52 weeks. It shall not include any payments for voluntary overtime, allowances, bonuses or otherwise.

Subject to the provisions of paragraph 5 (ADA White Book Section 6) an Employee who for any period is incapable of work due to an industrial accident or disease arising out of and/or in the course of their employment with their employer, and which is not due to their own negligence or misconduct, shall be entitled to payment of sick pay during that period whether or not they have attained the relevant period of Continuous Service (as defined in ADA White Book Section 1). Any sick pay paid to an Employee in this regard shall not be taken into account for the purposes of sub-paragraph (b) of paragraph 7 (ADA White Book Section 6).

The employee shall give their employer such information as the employer may reasonably require to enable them to determine the sum to be paid to the employee.

15. MEDICAL SUSPENSION

As per the Association of Drainage Authorities Lincolnshire Branch, Wages and Salaries and Conditions of Service 'White Book':

The provisions of this Section shall not have effect in the case of an Employee who is suspended on medical grounds where the terms of Sections 19 to 22 of the Employment Protection (Consolidation) Act 1978 apply.

Having regard to Public Health and the nature of the work, the provisions of this Section (ADA White Book Section 6) shall not apply to an Employee who is required by the employer, or on medical advice, to absent themselves from duty following contact with a case of notifiable disease. Such absence shall be regarded as special leave with pay, provided that it shall be inclusive of any Statutory Sick Pay that is payable during such absence.

16. ACCESS TO MEDICAL RECORDS

The Board may need to request a copy of an employee's medical reports or medical records to assist in the assessment of the employee's medical condition. The employee's consent, in line with requirements under the Access to Medical Reports Act 1988, will be obtained prior to the Board contacting their GP. The employee is entitled to see a copy of the documentation provided. In line with data protection legislation, employees will also be given details on the reason for the examination, what the Board intends to do with the data obtained and the lawful basis for processing the data.

17. LONG TERM SICKNESS

Employees should be aware that the Board is sympathetic towards genuine illnesses and will support employees. However, it is not realistic for the sickness-related absence to continue forever.

The Board will be eager to get the employee back into the workplace as appropriately and effectively as possible, but the employment may need to be reviewed if this cannot be achieved.

There will be full consultation with the employee, together with a medical investigation and consideration of redeployment or alternative employment.

If there is regular or persistent absence due to long term sickness, injuries etc, the situation is unlikely to be able to continue forever. Ultimately, employment may be terminated after full compliance with the Board's termination procedures in these circumstances. See the relevant section in relation to dismissal for more information on this aspect.

The Board will usually require employees who have been absent for one month or more or who are expected to be absent for one month or more, to return some or all of the Board's equipment. This may be requested so that the equipment can be redeployed to other employees.

Should a return to work be possible, the Board may require the employee's current fitness to be determined and confirmed by a medical practitioner, of the Boards' choosing.

18. DISABILITY

The Board has a duty to make reasonable adjustments where an employee has a disability (Equality Act 2010), as a means of enabling the employee to continue to carry out their role and to support any identified disadvantage being removed.

Whilst adjustments are unique to the individual's situation some examples include:

- Acquiring or modifying equipment – e.g. adapted keyboards or telephone
- Providing training – to use specialist equipment
- Changing location to a more accessible office
- Altering hours of work i.e. to assist with travelling
- Reduced hours
- Providing reasonable adjustment to role responsibilities
- Reasonable adjustments to premises

The employee will be consulted fully on these.

The duty to make the adjustments is 'reasonable' so if the suggested adjustment is not viable it will not be made. It may also be the case that no reasonable adjustments are possible to facilitate a return to work. There may be no alternative roles or employment available and if there is no prospect of the employee being able to return to work in the near future, it may be inevitable that a decision to dismiss is the final and only option.

19. DISMISSAL

If long term sickness absence leads to dismissal, the employee will be provided with the reasons for the dismissal in writing. The reasons for dismissal should set out the circumstances that led to the decision to dismiss.

Employees have the right to appeal the decision, to the Chief Executive, setting out the reasons for their appeal as per the Association of Drainage Authorities Lincolnshire Branch, Wages and Salaries and Conditions of Service 'White Book'; *If you wish to appeal you should do so in writing, stating your full grounds of appeal, to the Chief Officer within one week of the date on which you were informed of the decision.*



Black Sluice Internal Drainage Board

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Return to Work

This form must be completed after any period of absence other than holiday.

Name	
Job title	
Date	

First date of absence:		Total days of absence:	
Last date of absence:		Was the correct absence reporting procedure followed?	

What was the possible cause of your sickness absence and is there any action you have you taken to avoid any future occurrence?

How are you now and are you able to carry out normal hours and duties? (E.g., are you on any medication that would make it unsafe to be driving / using machinery?)

What support do you need from the Board – are there any reasonable adjustments you would like us to consider?

Signed (Employer) Date:

Signed (Employee) Date:

**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 (a) Coastal flooding from failure or overtopping of defences	High	Low	3		
	1.1	(b) Fluvial flooding from failure or overtopping of defences	High	Low	3		
	1.1	(c) Flooding from failure of IDB pumping stations or excess rainfall	High	Low	3		
	1.1	(d) Flooding from sewers or riparian watercourses	Medium	Low	2		
	1.2	Loss of Electrical Supply	High	Low	3		
	1.3	Pumps failing to operate	High	Low	3		Maintenance
	1.4	Board Watercourses being unable to convey water	Medium	Low	2		Maintenance
	1.5	Operating machinery to maintain watercourses	Medium	Low	2		Training
	1.6	Claims from third parties for damage to property or injury	Medium	Low	2		
	1.7	Third Parties damage to Board maintained assets	Medium	Low	2		
	1.8	Unplanned loss of senior staff	Medium	Medium	4		
	1.9	Insufficient finance to carry out works	High	Medium	6		
To conserve and enhance the environment wherever practical and possible to ensure there is no net loss of biodiversity.	1.10	Reduction in staff performance	Medium	Low	2		
	1.11	Insufficient staff resources	Medium	Low	2		Review
To provide a 24 hour/365 day emergency response for the community	2.1	Prosecution for not adhering to environmental legislation	Medium	Low	2		BAP
	2.2	Non delivery of objectives	Low	Low	1		BAP
To provide a safe and fulfilling working environment for staff.	3.1	Emergency Plan inadequate or not up to date	Low	Low	1		Review
	3.2	Insufficient resources (Staff and Equipment)	Medium	Low	2		Review
	3.3	Critical Incident loss of office	High	Low	3	None	
To maintain financial records that are correct and comply with all recommended accounting practice.	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 ensure that all actions taken by the Board comply with all current UK and EU legislation	5.1	Loss of cash	Low	Low	1	None	
	5.2	Loss of money invested in building societies, banks and managed funds	Medium	Low	2	None	
	5.3	Fraud by senior officers	Medium	Low	2	None	
	5.4	Inadequacy of Internal Checks	Medium	Low	2		
	5.5	Fraudulent use of credit cards	Low	Medium	2		
A cost efficient IDB that provides a Value for Money service.	6.1	Board Members in making decisions	Low	Low	1		
	6.2	Not complying with all employment regulations and laws	Medium	Low	2		
Information Technology and Communications	7.1	Collecting insufficient 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	Breach in Cyber Security	Medium	Low	2		
	8.6	Network Security Breach	Medium	Low	2		
	8.7	Virus being introduced to Network	Medium	Low	2		
	8.8	Loss of accounting records	Medium	Low	2	None	
	8.9	Loss of rating records	Medium	Low	2	None	

CATALOGUE OF BOARD POLICIES

		A&R Committee Review													To be reviewed								
			Apr 17	Sep 17	Apr 18	Sep 18	Apr 19	Sep 19	Apr 20	Sep 20	Apr 21	Sep 21	Apr 22	Sep 22	Apr 23	Sep 23	Apr-24	Sep-24	Apr-25	Sep-25	Apr-26	Sep-26	
	Management Accounts	3 years	✓		✓						✓						✓						
	Annual Accounts	3 years		✓		✓						✓						✓					
A	Policy Statement Water Level & Flood Risk Management	5 years			✓										✓								
B	BSIDB Byelaws	5 years			✓							✓										✓	
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	3 years			✓			✓						✓	✓						✓		
5	Investment Strategy	5 years							✓											✓			
6	Insurance Arrangements	3 years				✓		✓				✓	✓							✓			
7	Black Stiuce IDB H&S Booklet		Not reviewed by Audit & Risk Committee																				
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	3 years	✓										✓							✓			
11	Biodiversity Action Plan	Annual	To be reviewed annually by Environment Committee																				
12	Standing Orders		No review required										✓	No review required									
13	Emergency Flood Response Plan	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	5 years			✓										✓								
26	H&S Young Persons Safety at Work policy	5 years						✓									✓						
27	Control of Ragwort	5 years				✓										✓							
28	Land Drains discharging into Board Maintained Watercourses	5 years				✓										✓							
29	Control of Rabbits, Rats & other Rodents	5 years				✓										✓							
30	Pension Discretion LPP 2014	3 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	✓											✓									
44	Development Control Charges and Fees Policy	5 years				✓		✓												✓			
45	Mobile Phones & Devices	5 years						✓												✓			
47	COVID-19 Business Continuity Plan	N/A								✓													
48	Substance and Alcohol Misuse	5 years																				✓	