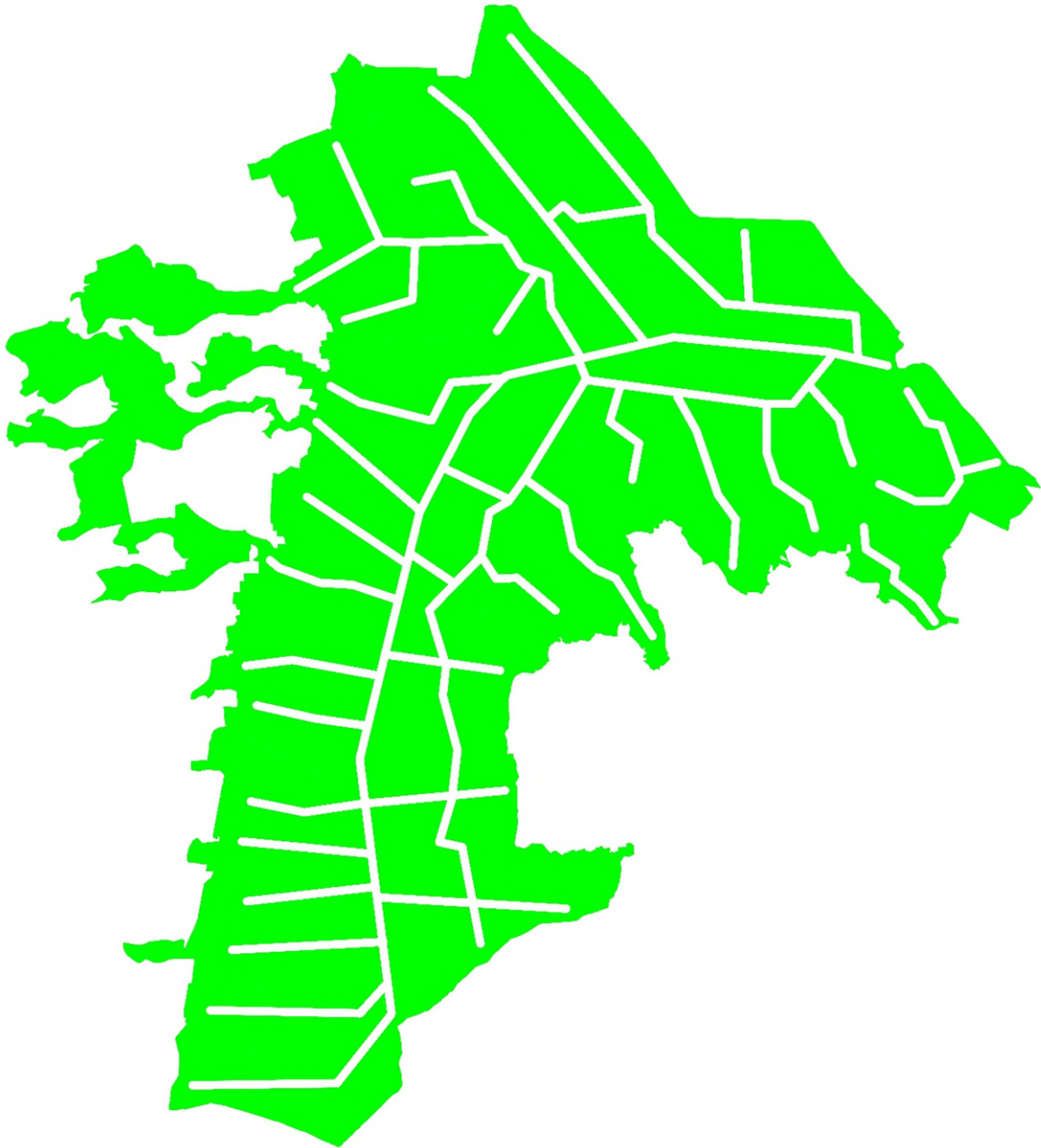


BLACK SLUICE

INTERNAL DRAINAGE BOARD

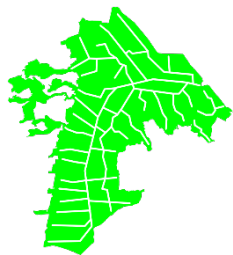


Audit & Risk Committee Meeting

Tuesday, 28th October 2025 at 2pm

Station Road, Swineshead, Lincolnshire PE20 3PW

Intentionally Blank



Black Sluice Internal Drainage Board

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Our Ref: DW/JP/B10

Date: 21st October 2025

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, 28th October 2025 at 2pm at which your attendance is requested.

Chief Executive

A G E N D A

1. Recording the meeting.
2. 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 15th April 2025 **(pages 1 - 15)**
5. Matters arising.
6. To receive the Annual Return including External Auditors Opinion for 2024/25 **(pages 16-21)**
7. To review the following policies:
 - (a) Policy No.03: Financial Regulations **(pages 22- 26)**
 - (b) Policy No.15: Employees Code of Conduct **(pages 27-30)**
 - (c) Policy No.16: Fraud and Corruption **(pages 31-34)**
 - (d) Policy No.20: Officers Car Loans & Electric Car Scheme **(pages 35-37)**
 - (e) Policy No.30: Pension Discretion LPF 2014 **(pages 38-42)**
 - (f) Policy No.42: Near Miss Reporting **(pages 43-44)**
8. To receive the Catalogue of Board Policies with recommended approval dates **(page 45)**
9. To review the Risk Register **(page 46)**
10. 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
15th April 2025 at 2pm

Members

Chairperson - * Mr M Leggott

* Mr T Ashton	* Mr V Barker
* Mr M Mowbray	Cllr Z Lane
Cllr M Geaney	Cllr S Welberry

* Member Present

In attendance: Mr D Withnall (Chief Executive)
Mrs A Chamberlain (Finance & Admin Director)
Mr C Harris (Internal Auditor - Lighthouse Consultancy)
Mr J Burton (NFU)
Mr P Ingleby (NFU)

2460 Recording the Meeting - Agenda Item 1

Members were informed that the meeting would be recorded.

2461 Apologies for absence - Agenda Item 2

Apologies for absence were received from Cllr M Geaney and Cllr Z Lane. The Chairperson welcomed Mr C Harris, Mr J Burton and Mr P Ingleby to the meeting.

2462 Declarations of Interest - Agenda Item 3

No declarations of interest were received.

2463 Review the Audit & Risk Terms of Reference - Agenda Item 4

Mr V Barker questioned if the one additional member within the membership should be an Executive Committee member? The Chairperson noted that it was left open to provide more option for Board Members to join the committee.

All AGREED to recommend the Audit & Risk Committee's Terms of Reference to the Board for approval.

2464 Minutes of the last meeting - Agenda Item 5

Minutes of the last meeting held on 29th October 2024, copies of which had been circulated, were considered and it was AGREED that they should be signed as a true record.

2465 Confidential Minutes of the last meeting

Confidential Minutes of the last meeting held on 29th October 2024, copies of which had been circulated, were considered and it was AGREED that they should be signed as a true record.

2466 Matters arising - Agenda Item 6

(a) Policy No. 01: Risk Management Strategy - Risk of breach in cyber security - Minute 2388(e)

It was noted that the Board has now changed from Barclaycard to Elavon, who now conduct the same testing for trying to get into the Board's systems, which has all come back clear.

(b) Policy No. 01: Risk Management Strategy – Risk of Loss of Rating Records – Minute 2388(f)

It was confirmed that the new Drainage Rate System is now up and running.

(c) Risk Register - Minute 2394

Risk 1.1(b) – Fluvial flooding from failure of overtopping of defences and Risk 1.1(c) Flooding from failure of IDB pumping stations or excess rainfall

The Chief Executive confirmed that the Environment Agency (EA) have now completed the bank repairs at Dunsby and Quadring. It being noted that there has been some discrepancy over the levels at Dunsby, with the Board negotiating a level of 2.95, with the EA not willing to increase the level as then the next low point would flood, and they could be deemed negligent.

Regarding the four pumping stations with water running around them during high water levels, the work was put out to independent tender, with a quotation received for less than £1.5million. This compares to the quote received through the government framework (SCAPE) of over £7million. It has been fed back to both the EA and local MP about the difference in quotes from independent tender verses the government framework. The Chief Executive also confirmed that funding has been achieved for this work (up to £3million).

2467 To review the insurance arrangements - Agenda Item 7

Mr J Burton and Mr P Ingleby gave the following presentation around the principles of what the Board currently has insured and the elements that the Board doesn't currently have covered.

Vehicle Cover

- Motor Fleet Policy – Comprehensive coverage for business vehicles such as light goods vehicles, Unimog, pick up trucks and trailers with comprehensive cover.
- Commercial Vehicle Policy – Tailored insurance for special vehicles like forklifts, teleporters, excavators, etc., with liability for underground pipes and cables comprehensive cover.

Vehicle cover - what is not currently insured:

- No claims discount - this is not currently protected (based on individual vehicles). By protecting the no claims discount, the discount applied would be retained, even if there was a claim. After two claims, the no claims discount would be reduced (with the protection). The Chief Executive felt it was an insurance on an insurance.
- Loss of use - Mr P Ingleby explained that if a vehicle was being fixed through an insurance claim and that vehicle was needed immediately, then, currently, the Board would have to hire a replacement at the cost of the Board. This could be covered through the loss of use cover. The Chief Executive explained that this has been previously explored in relation to the Unimog, but it proved to be cost prohibitive.

Business Property - Full all-risks coverage for commercial premises Including subsidence (except Pumping Stations). Contents, renewables and stock.

- Business interruption is also covered (e.g., in the event of the offices burning down, the insurance would provide alternative premises to work from). The current business interruption period covered is twelve months and £500,000, Mr J Burton questioned if that is long enough to be able to get back to the original position (suggesting probably not with a site clearance phase, new plans to be produced, the construction phase etc., the availability of builders etc.)? The committee felt it would be beneficial for the NFU to provide quotes for 18 months and 24 months.
- Pumping Stations unforeseen breakdowns - Mr J Burton explained that pumping stations are insured for all the 'traditional' elements such as fire, malicious damage etc. but is not currently covered for the impacts of a sudden and unforeseen breakdown. Mr M Mowbray noted that the least that would require doing would be running a mobile pump instead. Mr P Ingleby confirmed that the increased cost of working (the mobile pump) would be covered, but the cost of the repair itself would still be the Board's.

Mr V Barker questioned how Swineshead Pumping Station would fit into this? The Chief Executive noted that because Swineshead's issues are known about, it wouldn't be covered.

The Chairperson questioned if all elements of increased cost would be covered, or whether some things wouldn't be included? The Chief Executive gave the example of Swineshead Pumping Station, explaining that, if the Board didn't know about its issues, and it collapsed (old, built on metal frame that has corroded), what would be covered? Mr J Burton

noted that subsidence is excluded on pumping stations, likewise, wear and tear is also excluded. The Chairperson gave an example of the failure of a gearbox, Mr P Ingleby confirmed that he couldn't see why that wouldn't be covered.

The Chief Executive noted that, given the unique way the Board is funded, if there was work that needed to be done on a pumping station it would likely be funded through Defra (Grant in Aid).

Mr V Barker added that due to the Board's maintenance regime, he didn't believe the extra insurance cover to be necessary.

Mr T Ashton added that, for the majority of cases, it is likely that the Board are aware that something isn't right before the breakdown or issue occurs.

- Terrorism – Pumping stations are also not currently insured against acts of terrorism. The Chief Executive noted that this has been discussed before, but that it was felt a low risk in this area. The Chairperson noted that it is probably the telematics that are more at risk than the pumping stations. Mr T Ashton agreed that the risk is very low, noting that the Board's own ratepayers don't always understand what and where the Board are, let alone others.

Liability & Specialist Insurance Lines

- Employers Liability - £15million cover
- Public and Products Liability - £15million cover
- Environmental Liability

Legal & Management Protection

- Legal expenses
- Directors and Officers
- Employment Practices
- Fraud - currently limited to fraud by deception of employees only, third party fraud is not covered (physical or financial theft), i.e., employees colluding with third parties in this way.

Mr V Barker gave the only relevant example he could think of; whereby sometimes excavators have a second basket on site with them, that can then be stolen, whether seen by chance or notified by an employee.

The Chief Executive gave the example of an employee letting a third party into the offices to steal all the equipment – would that equipment be covered? Mr P Ingleby noted that he would have to check.

Mr P Ingleby gave one of the most common examples, impersonation fraud, e.g., bank details being changed on an invoice or sending emails pretending to be a colleague. The Board's robust processes were noted to prevent such incidents.

Specialist Services

- Engineering inspection
- Professional indemnity

Credit – currently not covered are there any bad debts? The Chief Executive noted that, generally, most debt is recoverable by the Board.

Accident & Illness – The Chief Executive noted that the Board did used to have this cover, but that it was stopped due to it being seen as not necessary as the Board pay six months full pay and six months half pay for sickness absence.

Mr V Barker gave an example of an employee contracting something such as Weil's Disease and then later dying from it – questioning how that would be covered? It was confirmed that the employee would have cover under the employer's liability insurance if it was proved that there was negligence from the employer (Board). If it was not proven negligent, then the Board would be paying for the employee to be off sick and not at work.

The Accident & Illness cover would compensate the Board for the sick pay. The Chief Executive noted that he believes the employee is well protected (Board's sick pay and pension), the cost would be with the Board for paying the employee whilst not working and covering the employee while not working.

Business Travel – The Chief Executive noted that for the limited travel the Board do, a bespoke policy would be taken out ad hoc if required.

Cyber – Mr P Ingleby explained that there are three packages available as below:

- Breach Bundle
- Impact Bundle
- Complete Bundle

Mr P Ingleby explained that the first bundle includes cover for the consequences of what the Board may do towards a third party. The complete bundle covers the Board's systems also. The impact bundle excludes any outsource providers. Mr P Ingleby noted that the complete bundle, in his opinion, is the recommended coverage package.

Mr P Ingleby explained that with a cyber liability policy, the customer choses the amount covered, therefore the cost is dependent on this. Mr P Ingleby continued that in a lot of cyber-attack cases, there is a lot of expense with the forensic cyber investigation element which requires specialists, sometimes even lawyers, which can be costly, on top of the cost associated with keeping the Board operating and re-instating any lost data. Mr P Ingleby added that around 8% of claims, the insurer will pay the ransom and that fraudsters know this, with them often sitting in systems for months before making themselves known.

The Chairperson noted a recent cyber-attack (ransom group based in Russia) at a neighbouring IDB, who requested a six-figure ransom sum. After negotiation, a reduced ransom sum was paid through the insurers. All the ratepayer data was lost and down-time of 2-3weeks. He believed their insurance was c£2,500 premium for £5million cover. Mr P Ingleby noted that these groups

will match the ransom sum to the company's ability to pay it, adding that it is a relatively simple process to get a quote, but that he won't know the premium until he knows how much cover is required.

Mr V Barker questioned if there is a danger of paying the ransom and then being targeted again? It was noted that these groups are about reputation, and they know if they returned to the same companies, they wouldn't get paid the ransom.

The Chief Executive noted that the Board had an attack several years ago but was spotted and stopped before they were a third of the way through the server. They had got in through an employee clicking on links sent via email, noting that it is people that are the weakest link and hence the Board now having robust processes in place, including multi-factor authentication. The Chief Executive further noted that the Board are subject to 500-1000 attacks a week, that are stopped through the Board's systems. Adding that it is ever changing, and those targeting are very clever people.

Mr M Mowbray noted that if the Board are already preventing that many attacks a week, is the insurance required? The Chief Executive noted that the insurance is not necessarily about those systems in place but is about the support and specialists it offers if the Board were subject to attack and how the Board would resolve it if they did not have the cover.

All AGREED for the NFU to provide quotes for this, to be presented to the Executive Committee and Board, at the following levels of cover: £200,000, £500,000, £1million, £2million.

The committee thanked Mr P Ingleby and Mr J Burton for their attendance, who then left the meeting.

2468 To receive a report from the Internal Auditor - Agenda Item 8

(a) Internal Audit Report for 2024/25

Mr C Harris, the Internal Auditor, gave the following update, starting by thanking the Chief Executive and Finance and Admin Director for making all the documents required for the audit readily available. The Internal Auditor highlighted that the Board were awarded 'Substantial Assurance' with no recommendations.

The Internal Auditor noted that he conversed with the Chief Executive about the Board's reserves, noting that he is happy that the Board's reserves are in a good position but the importance of it being reviewed annually and ensuring that any reserves used can be replenished in the following year.

There being no questions raised, the Board Officer's left the meeting to allow for discussion between the committee and Internal Auditor.

(b) Audit programme for 2025/26

The Internal Auditor presented the audit programme for 2025/26, noting that it follows the criteria required for the Annual Governance and Accountability Return (AGAR), and does sufficient testing to establish that the controls measures are working well, looking at things from a systems point of view.

The Internal Auditor highlighted that there is nothing within the programme on cyber security, this could be added, at a premium. Further adding that he believes the cyber insurance would be a prudent and sensible investment.

The Internal Auditor added that he can be contacted at any time, noting there is no extra charges.

The Chief Executive noted that there was discussion during the awarding of the tender for the auditing contract around the succession for Mr C Harris. The Internal Auditor noted it is intended to bring somebody on to train up for IDB auditing. The Internal Auditor noted that he won't likely still be working for the full term of the contract but will hopefully be for another two – three years yet.

Mr V Barker referenced double signatures being required, on things such as cheques, noting that he had heard of wrongful cheques being accepted by the bank (i.e., no double signature or unauthorised signatories). It was noted that it is now an electronic process and that the Board very rarely deal with cheques for expenditure. It being further added that the only expenditure that can be done without dual authorisation is the Director's credit cards (max. £5,000) and petty cash.

The Internal Auditor noted that he is happy to be contacted any time, by any Board Members, about potential areas to be added into the programme.

The Chairperson thanked the Internal Auditor, who stayed for the remainder of the meeting.

2469 To review the following Board's policies - Agenda Item 9

(a) Policy No. 1: Risk Management Strategy

The Chairperson presented the Risk Management Strategy, with discussion as follows.

1.1(a) Coastal flooding from failure of overtopping of defences

Mr V Barker questioned if the likelihood of the risk being 'low' should be higher than this due to global warming and rising sea levels. Adding that the Board need to consider outside of the Board's catchment area as well.

The Chief Executive referred the committee to the matrix and the three likelihood levels, suggesting that because of the Boston Barrier and only 8km of frontage, that the likelihood level of 'low' is suitable.

Mr T Ashton added that he believes this is something that will need to be considered over time, but due to it being reviewed annually, was of the opinion that, it is currently at the correct risk level of 'low'.

1.1(b) Fluvial flooding from failure or overtopping of defences

The Chief Executive noted that he believes there is still more work to be done to make the Board more resilient before this can be reduced. Highlighting that it states Dunsby bank has been repaired to 3.06m – this is actually 2.95m following remedial works by the contractor.

The pumping stations with water seepage during high water levels have now been successful in achieving funding, so once this work is complete, the committee can consider reducing this risk. The Chief Executive added that it is the Board leading and driving these works, as opposed to the Environment Agency (EA).

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

The Chief Executive explained that the structural issues at the pumping stations are noted within this risk, and that the EA six-year programme has been reduced to a five-year programme and have awarded the Board £6.3million funding to be spent in the next twelve months to fund some of this work.

1.1(d) Flooding from sewers or riparian watercourses

The Chief Executive noted that riparian watercourses, with landowner responsibility, is one of the elements that can take up Board Officer's time but is essential to make sure the whole system works efficiently.

1.2 Risk of loss of reputation or being found negligent due to Emergency Actions

The Chief Executive explained that this is a proposed new risk in light that there is currently an ongoing court case regarding the claimant seeking to recover costs from the Board for flooding of land (no property flooded) because of the Board making the decision to switch the pumping station (Heckington) to emergency levels (as per the Board's Emergency Response Plan). If successful, this will set a precedence and the Board will not be able to switch to emergency pumping, therefore, having to continue to pump into the South Forty Foot Drain, increasing risk of overtopping and breach. This has been mentioned to the EA Area Director and the EA have offered legal assistance if it goes to trial. This would be in addition to the Board's Barrister (through insurance). Mr W Ash questioned if the claimant has a Barrister? The Chief Executive didn't believe so. All AGREED to the addition of this risk.

1.3 Risk of loss of electrical supply

It was noted that some of the pumping stations electric transformers are being raised, the Board doing what they can to mitigate risk.

Mr V Barker questioned if there was no electric supply to the offices, what measures are in place? The Chief Executive confirmed that the Board don't have a generator that could run it, it also being felt that other IDBs wouldn't have one the size that would be required to be able to borrow. The Chief Executive did note that there are uninterrupted power supplies on the telemetry, if the remote control of pumping stations was lost completely, the workforce would operate them manually. The Chief Executive added that the Board have previously looked into purchasing a generator, and battery storage for the solar panels, but has not been progressed further than that. Mr V Barker questioned the typical daily consumption of the office? The Chief Executive responded that there is a system being installed which will analyse the electricity usage. Mr V Barker noted his initial concern around what would be done if the office was without power for a long period. The Chief Executive confirmed, that as long as it wasn't a wide outage, everything that can be done in the office can be done from home.

The Chairperson referred to the dual drive gearbox facility within pumping stations, questioning if the Board still have a list of tractor owners that could be called upon to power the pumping stations. It was confirmed that this contact list forms part of the Emergency Response Plan.

1.4 Risk of failure of Board's Pumping Stations

The Chief Executive noted that this was previously titled 'Risk of pumps failing to operate' and has proposed to change it to the above for it to be wider ranging and include for possibilities such as structural failure.

The Chief Executive questioned whether the committee think the likelihood should be increased from 'low' given the current circumstances around Swineshead Pumping Station? All AGREED to increase the potential likelihood of risk from low to medium.

1.5 Risk of Board Watercourses being unable to convey water

The Chief Executive highlighted to the committee that the Board has just spent £897,000 on slip repairs (through IDB Recovery Fund) and so the Board is now in a good position in relation to slips.

Mr V Barker noted the increase in failed culverts, as a result of increased flows, and his specific concern about those culverts that are the responsibility of Lincolnshire County Council Highways which are then not repaired. The Chief Executive confirmed that if it was preventing the conveyance of water, then the Board would remove it. The Chairperson added that litter can also cause culvert blockages, suggesting that culverts need clearing as the Board conducts maintenance of the watercourses.

The Chairperson noted the addition of '*programme of desilting to be developed prioritised following surveying*', questioning why this hasn't been done before now? The Chief Executive confirmed that the Site Engineer is now able to do this surveying work, whereas previously there was nobody employed to do such work, meaning it was therefore previously done on a 10-year rotating programme.

1.6 Risk of operating machinery to maintain watercourses

The Chairperson noted that he attends the Health and Safety Committee meetings as the Board representative and that they are thorough and useful meetings.

1.7 Risk of claims from third parties for damage to property or injury

Mr V Barker is pleased that the operators work the machines in a manner that doesn't cause frequent accidents.

1.8 Risk of third parties damage to Board maintained assets

The Chairperson noted that the Board have been lucky and not really experienced vandalism.

1.9 Risk of unplanned loss of senior staff

The Chief Executive noted that the current note within 'further work' about contingencies for senior roles could now be removed following the succession of the current Chief Executive and new Director roles. It being noted that all three Directors are trained to operate the Emergency Response Plan and have both operational and administrative knowledge between them.

All AGREED to remove the further work around contingencies and reduce the likelihood of risk to low.

1.10 Insufficient finance to carry out works

The Chief Executive noted the additional financial pressures on the Board in relation to increased electricity costs, the wet weather etc., noting that this has been offset recently by the IDB Recovery Fund, although there are structural works going forward to consider. The Chief Executive felt the Board are in a positive position, with a £12-£14million capital programme of works for 2025/26 (Grant in Aid funding).

The Chairperson was of the opinion that IDBs were lucky to get such funding and that, going forward, it is likely that government funds will be cut back, adding that, in his opinion, the risk level should remain at 6.

Mr T Ashton agreed to leave it at risk level 6 and review again next year.

1.11 Reduction in staff performance

The Chairperson noted that employees seem motivated and are good at their jobs.

1.12 Insufficient staff resources

The Chief Executive noted that he believes the elevated risk is offset by those employed in specialist roles i.e., Environment Officer and Project Manager.

2. To conserve and enhance the environment wherever practicable and possible to ensure there is no net loss of biodiversity - The Chief Executive noted the proposed change in title from 'practical' to 'practicable', which is the legal terminology.

2.1 Risk of prosecution for not adhering to environmental legislation

The Chairperson noted that the Environment Officer will help to offset this risk.

3.3 Risk of critical incident loss of office

It was noted that this was discussed within the insurance review earlier in the meeting, adding that the NFU representatives mentioned that the Board had £500,000 interruption cover over twelve months, whereas this is stated at £100,000. The Chief Executive to confirm with the NFU and amend as required.

5.3 Risk of fraud by senior officers

Mr V Barker felt this could be reduced to risk level 1. The committee reviewed the matrix, with the potential impact of risk at low being up to £20,000, the committee AGREED to reduce the potential impact to low.

5.4 Risk of inadequacy of internal checks

Mr V Barker felt this could be reduced. The Chief Executive disagreed because of the amount of impersonation fraud etc. and despite the Board's systems, the risk remains.

5.5 Fraudulent use of credit cards

The Chairperson suggested that the likelihood of risk could be reduced to low, all AGREED.

6.2 Risk of not complying with all employment regulations and laws

The Chief Executive highlighted that this relates to employment tribunals, which would likely be more than £20,000 if found to be in the employee's favour.

7.1 Risk of collecting insufficient income to fund expenditure

Mr V Barker noted his concern that risk level 1 is not high enough, giving an example of a period of high electricity costs indenting into the reserves. The Internal Auditor felt that the Board's general reserves are in a good position and would be satisfied in leaving it at risk level 1, reviewing annually based on the expenditure that year.

7.2 IDB abolished or taken over

The Chief Executive questioned whether the progression of unitary authorities and mayoral elections should be mentioned within this risk. The Chairperson noted that it could potentially affect the quality of Board Members.

Mr T Ashton explained that devolution doesn't pose a threat to the Board, with ongoing discussion around the Mayor having a greater role in the flood risk water management priorities in Greater Lincolnshire, but that shouldn't affect the work of the Board. Mr T Ashton felt the greater risk to the Board is, if, and when, Lincolnshire moves to unitary councils, there will be no guarantee around who will be appointed to the Board. There will be 180-200 councillors covering Greater Lincolnshire and so those councillors will have a lot more IDBs to cover, potentially affecting calibre and attendance. The other element to consider is that if the councillors had the majority in relation to voting on the Board, they could steer the vote in a certain direction, for example, in relation to budget setting and increases in the penny rate. It is expected that the new councils will be formed in 2027-2028. The Chief Executive also noted the risk of where the special levy will go, if a unitary authority, rather than the current four councils within the Board's catchment. The Chief Executive didn't feel there was an increased risk of abolishment or being taken over, explaining that the Lead Local Flood Authority will be unitary (surface water), the Environment Agency are also a supervising body (fluvial) and there will be a new mayoral authority with some responsibility for water management, which is currently unknown. All AGREED to add under 'further work' – 'Monitoring developments with unitary devolution and establishment of the mayoral authority'.

8.3 Risk of loss of internet connections

The Chief Executive noted that the reference to 'recent limitations on the network due to low upload speeds' can now be removed.

8.5 Risk of breach in cyber security

In light of the discussion with NFU insurance regarding cyber security, the Chairperson questioned if the committee are happy with a risk level of 2? After reviewing the criteria of the matrix and considering the number of attempted penetrations into the system per week, the committee AGREED to increase potential impact to high and the potential likelihood to medium.

8.6 Risk of network security breach

The Chief Executive explained that in order to get into the network, somebody would require a username and password and their mobile phone. Mr V Barker felt that the risk level was appropriate in light of all the measures in place. Although the measures reduce the likelihood, it was felt the impact could be high. It was confirmed that this risk relates more to data breaches than cyber security, with the Internal Auditor adding that data protection fines can be quite large. All AGREED to increase the impact to high.

8.7 Risk of virus being introduced to the network

The Chief Executive felt that this risk has become more aligned with risk 8.5 and could therefore be merged together to become one risk. All AGREED.

8.8 Risk of loss of accounting records

The Chief Executive noted that HBP (IT Consultants) provide the accounting software, so could easily be retrieved through their systems, therefore meaning the impact could be reduced to low. All AGREED to reduce the potential impact to low.

8.9 Risk of loss of rating records

The Chief Executive noted that there are three back ups of this systems at three locations. The risk of not being able to collect the drainage rate income, or a delay in the collection of drainage rates was noted, with the Chairperson suggesting that the impact could be high. All AGREED to increase the impact to high.

The Committee RESOLVED to recommend that the Risk Management Strategy (No. 01) be approved at the next Board meeting.

(b) Policy No. 33: Smoking

The policy was presented, noting the minimal proposed changes. The Chairperson noted the reference to 'matches and match boxes' suggesting that the majority would use lighters rather than matches.

The Committee RESOLVED to recommend that the Smoking policy (No. 33) be approved at the next Board meeting.

(c) Policy No. 35: Fire Management Plan

Mr V Barker noted that he has been unable to let himself out of the lift on more than one occasion. The Chief Executive suggested the addition of 'Do not use lift in the event of an emergency' to paragraph 2.5 – Evacuation procedures for disabled persons.

The Chief Executive highlighted the proposed change to paragraph 2.7, noting that a sweep of the building would be done as leaving. Further noting that, due to GDPR, an electronic visitors' book is being considered, which would enable logging in to retrieve a list of who is in the building on any device.

It was confirmed that the fire alarm is tested quarterly at random.

The Committee RESOLVED to recommend that the Fire Management Plan (No. 35) be approved at the next Board meeting.

(d) Policy No. 39: Wearing of seatbelts in Board vehicles

The Chief Executive highlighted the proposed addition of HSE approved guidance into the policy, explaining that this has been added due to it being raised by employees at the Health & Safety Committee meetings that they don't believe they should wear seatbelts whilst working adjacent to water. The Chief Executive disagrees and believes they should wear their seatbelts near water, noting the risk of banging their head and becoming unconscious because of not wearing it, for example. Therefore, Regulation 25 and 26 of the HSE Approved Code of Practice and Guidance has been included in the policy, which confirms they should be wearing the seatbelt when near water. The Chairperson agreed with the Chief Executive in that the guidance of the HSE should be adopted, noting that the employees concern was around not being able to get the seatbelt off to get out due to pressure it would be under, it being suggested that the employees are issued with a tool to be able to cut the seatbelt.

Mr V Barker referenced 4x4 trucks working alongside watercourses, noting that if the vehicle were to enter the watercourse, it is likely that the electric systems would be immobilised, it therefore being beneficial to have the windows open so that there would be an escape route.

It was noted that a device can be purchased which will cut the seatbelt and smash the window. All employees to be issued with one, it being added into the policy 'Window breaker seatbelt cutter device to be kept within reach in all vehicles operating near watercourses'.

The Committee RESOLVED to recommend that the Wearing of Seatbelts in Board Vehicles (Policy No. 39) be approved at the next Board meeting.

(e) New Policy: Maternity

The Chief Executive noted that the occupational maternity pay has been approved by the Executive Committee.

The Committee RESOLVED to recommend that the Maternity Policy be adopted at the next Board meeting.

2470 To review the Board's' Cyber Security measures - Agenda Item 10

The Chief Executive noted that this report details the current measures in place in relation to cyber security.

2471 To review the Risk Register - Agenda Item 11

The committee AGREED that the Risk Register be accepted (with the changes to be made as per the Risk Management Strategy).

2472 To receive the Catalogue of Board Policies with recommended approval dates – Agenda Item 12

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

2473 Any Other Business - Agenda Item 13

(a) Thanks to the Chief Executive

Mr V Barker thanked the Chief Executive for his initiative and lead, with regard to the accounts and achieving substantial assurance in the internal audit but especially in relation to computer systems and measures to prevent cyber security threats.

(b) Thanks to Internal Auditor

The Chairperson thanked the Internal Auditor for his attendance and for his input throughout the meeting.

There being no further business the meeting closed at 16:45.

Annual Governance and Accountability Return 2024/25 Form 3

To be completed by Local Councils, Internal Drainage Boards and other Smaller Authorities*:

- where the higher of gross income or gross expenditure exceeded £25,000 but did not exceed £6.5 million; or
- where the higher of gross income or gross expenditure was £25,000 or less but that:
 - are unable to certify themselves as exempt (fee payable); or
 - have requested a limited assurance review (fee payable)

Guidance notes on completing Form 3 of the Annual Governance and Accountability Return 2024/25

1. Every smaller authority in England that either received gross income or incurred gross expenditure exceeding £25,000 must complete Form 3 of the Annual Governance and Accountability Return at the end of each financial year in accordance with *Proper Practices*.
2. The Annual Governance and Accountability Return is made up of three parts, pages 3 to 6:
 - The Annual internal Audit Report must be completed by the authority's internal auditor.
 - **Sections 1 and 2** must be completed and approved by the authority.
 - **Section 3** is completed by the external auditor and will be returned to the authority.
3. The authority must approve Section 1, Annual Governance Statement, before approving Section 2, Accounting Statements, and both must be approved and published on the authority website/webpage before 1 July 2025.
4. An authority with either gross income or gross expenditure exceeding £25,000 or an authority with neither income nor expenditure exceeding £25,000, but which is unable to certify itself as exempt, or is requesting a limited assurance review, must return to the external auditor by email or post (not both) no later than 30 June 2025. Reminder letters will incur a charge of £40 +VAT:
 - the Annual Governance and Accountability Return Sections 1 and 2, together with
 - a bank reconciliation as at 31 March 2025
 - an explanation of any significant year on year variances in the accounting statements
 - notification of the commencement date of the period for the exercise of public rights
 - Annual Internal Audit Report 2024/25

Unless requested, do not send any additional documents to your external auditor. Your external auditor will ask for any additional documents needed.

Once the external auditor has completed the limited assurance review and is able to give an opinion, the Annual Governance and Accountability Section 1, Section 2 and Section 3 — External Auditor Report and Certificate will be returned to the authority by email or post.

Publication Requirements

Under the Accounts and Audit Regulations 2015, authorities must publish the following information on the authority website/webpage:

Before 1 July 2025 authorities must publish:

- Notice of the period for the exercise of public rights and a declaration that the accounting statements are as yet unaudited;
- **Section 1 -Annual Governance Statement 2024/25**, approved and signed, page 4
- **Section 2 -Accounting Statements 2024/25**, approved and signed, page 5

Not later than 30 September 2025 authorities must publish:

- Notice of conclusion of audit
- **Section 3 - External Auditor Report and Certificate**
- **Sections 1 and 2 of AGAR** including any amendments as a result of the limited assurance review. It is recommended as best practice, to avoid any potential confusion by local electors and interested parties, that you also publish the Annual Internal Audit Report, page 3.

The Annual Governance and Accountability Return constitutes the annual return referred to in the Accounts and Audit Regulations 2015. Throughout, the words 'external auditor' have the same meaning as the words 'local auditor' in the Accounts and Audit Regulations 2015.

**for a complete list of bodies that may be smaller authorities refer to schedule 2 to the Local Audit and Accountability Act 2014.*

Annual Governance and Accountability Return 2024/25 Form 3
Local Councils, Internal Drainage Boards and other Smaller Authorities*

Guidance notes on completing Form 3 of the Annual Governance and Accountability Return (AGAR) 2024/25

- The authority must comply with *Proper Practices* in completing Sections 1 and 2 of this AGAR. *Proper Practices* are found in the *Practitioners' Guide** which is updated from time to time and contains everything needed to prepare successfully for the financial year-end and the subsequent work by the external auditor.
- Make sure that the AGAR is complete (no highlighted boxes left empty) and is properly signed and dated. Any amendments must be approved by the authority and properly initialled.
- The authority should receive and note the Annual Internal Audit Report before approving the Annual Governance Statement and the accounts.
- Use the checklist provided below to review the AGAR for completeness before returning it to the external auditor by email or post (not both) no later than 30 June 2025.
- The Annual Governance Statement (Section 1) must be approved on the same day or before the Accounting Statements (Section 2) and evidenced by the agenda or minute references.
- The Responsible Financial Officer (RFO) must certify the accounts (Section 2) before they are presented to the authority for approval. The authority must in this order; consider, approve and sign the accounts.
- The RFO is required to commence the public rights period as soon as practical after the date of the AGAR approval.
- You must inform your external auditor about any change of Clerk, Responsible Financial Officer or Chair, and provide relevant authority owned generic email addresses and telephone numbers.
- Make sure that the copy of the bank reconciliation to be sent to your external auditor with the AGAR covers all the bank accounts. If the authority holds any short-term investments, note their value on the bank reconciliation. The external auditor must be able to agree the bank reconciliation to Box 8 on the accounting statements (Section 2, page 5). An explanation must be provided of any difference between Box 7 and Box 8. More help on bank reconciliation is available in the *Practitioners' Guide*."
- Explain fully significant variances in the accounting statements on page 5. Do not just send a copy of the detailed accounting records instead of this explanation. The external auditor wants to know that you understand the reasons for all variances. Include complete numerical and narrative analysis to support the full variance.
- If the bank reconciliation is incomplete or variances not fully explained then additional costs may be incurred.
- Make sure that the accounting statements add up and that the balance carried forward from the previous year (Box 7 of 2024) equals the balance brought forward in the current year (Box 1 of 2025).
- The Responsible Financial Officer (RFO), on behalf of the authority, must set the commencement date for the exercise of public rights of 30 consecutive working days which must include the first ten working days of July.
- The authority must publish on the authority website/webpage the information required by Regulation 15 (2), Accounts and Audit Regulations 2015, including the period for the exercise of public rights and the name and address of the external auditor before 1 July 2025.

Completion checklist — No' answers mean you may not have met requirements		Yes	No
All sections	Have all highlighted boxes have been completed?		
	Has all additional information requested, including the dates set for the period for the exercise of public rights, been provided for the external auditor?		
Internal Audit	Have all highlighted boxes been completed by the internal auditor and explanations provided?		
Section 1	For any statement to which the response is 'no', has an explanation been published?		
Section 2	Has the Responsible Financial Officer signed the accounting statements before presentation to the authority for approval?		
	Has the authority's approval of the accounting statements been confirmed by the signature of the Chair of the approval meeting?		
	Has an explanation of significant variations been published where required?		
	Has the bank reconciliation as at 31 March 2025 been reconciled to Box 8?		
	Has an explanation of any difference between Box 7 and Box 8 been provided?		
Sections 1 and 2	Trust funds — have all disclosures been made if the authority as a body corporate is a sole managing trustee? NB: do not send trust accounting statements unless requested.		

Governance and Accountability for Smaller Authorities in England — a Practitioners' Guide to Proper Practices. can be downloaded from www.nalc.gov.uk or from www.ada.org.uk

E C E L I V E L

Annual Internal Audit Report 2024/25

Black Sluice Internal Drainage Board

www.blacksluiceidb.gov.uk

During the financial year ended 31 March 2025, this authority's internal auditor acting independently and on the basis of an assessment of risk, carried out a selective assessment of compliance with the relevant procedures and controls in operation and obtained appropriate evidence from the authority.

The internal audit for 2024/25 has been carried out in accordance with this authority's needs and planned coverage. On the basis of the findings in the areas examined, the internal audit conclusions are summarised in this table. Set out below are the objectives of internal control and alongside are the internal audit conclusions on whether, in all significant respects, the control objectives were being achieved throughout the financial year to a standard adequate to meet the needs of this authority.

Internal control objective	Yes	No	Not covered
A. Appropriate accounting records have been properly kept throughout the financial year.	1		
B. This authority complied with its financial regulations, payments were supported by invoices, all expenditure was approved and VAT was appropriately accounted for.			
C. This authority assessed the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these.	1		
D. The precept or rates requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.	1		
E. Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for.	1		
F. Petty cash payments were properly supported by receipts, all petty cash expenditure was approved and VAT appropriately accounted for.			
G. Salaries to employees and allowances to members were paid in accordance with this authority's approvals, and PAYE and NI requirements were properly applied.	1		
H. Asset and investments registers were complete and accurate and properly maintained.			
I. Periodic bank account reconciliations were properly carried out during the year.	1		
J. Accounting statements prepared during the year were prepared on the correct accounting basis (receipts and payments or income and expenditure), agreed to the cash book, supported by an adequate audit trail from underlying records and where appropriate debtors and creditors were properly recorded.	1		
K. If the authority certified itself as exempt from a limited assurance review in 2023/24, it met the exemption criteria and correctly declared itself exempt. <i>(If the authority had a limited assurance review of its 2023/24 AGAR tick "not covered")</i>			1
L. The authority published the required information on a website/webpage up to date at the time of the internal audit in accordance with the relevant legislation.	1		
M. In the year covered by this AGAR, the authority correctly provided for a period for the exercise of public rights as required by the Accounts and Audit Regulations <i>(during the 2024-25 AGAR period, were public rights in relation to the 2023-24 AGAR evidenced by a notice on the website and/or authority approved minutes confirming the dates set)</i>			
N. The authority has complied with the publication requirements for 2023/24 AGAR <i>(see AGAR Page 1 Guidance Notes)</i> .	1		

—O— (For local councils only)

Trust funds (including charitable) — The council met its responsibilities as a trustee.

Yes No Not applicable

For any other risk areas identified by this authority adequate controls existed (list any other risk areas on separate sheets if needed).

Date(s) internal audit undertaken

Name of person who carried out the internal audit

28/01/2025

30/01/2025

31/01/2025

Christopher R Harris

Signature of person who
carried out the internal audit



Date

22/05/2025

*If the response is 'no' please state the implications and action being taken to address any weakness in control identified (add separate sheets if needed).

**Note: If the response is 'not covered' please state when the most recent internal audit work was done in this area and when it is next planned; or, if coverage is not required, the annual internal audit report must explain why not (add separate sheets if needed).

Section 1 — Annual Governance Statement 2024/25

We acknowledge as the members of:

Black Sluice Internal Drainage Board

our responsibility for ensuring that there is a sound system of internal control, including arrangements for the preparation of the Accounting Statements. We confirm, to the best of our knowledge and belief, with respect to the Accounting Statements for the year ended 31 March 2025, that:

	Agreed		Yes' means that this authority:
	Yes	No	
1. We have put in place arrangements for effective financial management during the year, and for the preparation of the accounting statements.	I		<i>prepared its accounting statements in accordance with the Accounts and Audit Regulations.</i>
2. We maintained an adequate system of internal control including measures designed to prevent and detect fraud and corruption and reviewed its effectiveness.	/		<i>made proper arrangements and accepted responsibility for safeguarding the public money and resources in its charge.</i>
3. We took all reasonable steps to assure ourselves that there are no matters of actual or potential non-compliance with laws, regulations and Proper Practices that could have a significant financial effect on the ability of this authority to conduct its business or manage its finances.			<i>has only done what it has the legal power to do and has complied with Proper Practices in doing so.</i>
4. We provided proper opportunity during the year for the exercise of electors' rights in accordance with the requirements of the Accounts and Audit Regulations.	I		<i>during the year gave all persons interested the opportunity to inspect and ask questions about this authority's accounts.</i>
5. We carried out an assessment of the risks facing this authority and took appropriate steps to manage those risks, including the introduction of internal controls and/or external insurance cover where required.	✓		<i>considered and documented the financial and other risks it faces and dealt with them properly.</i>
6. We maintained throughout the year an adequate and effective system of internal audit of the accounting records and control systems.	1		<i>arranged for a competent person, independent of the financial controls and procedures, to give an objective view on whether internal controls meet the needs of this smaller authority.</i>
7. We took appropriate action on all matters raised in reports from intomo, and oxtomal audit.	✓		<i>responded to matters brought to its attention by internal and oxtomal audit.</i>
8. We considered whether any litigation, liabilities or commitments, events or transactions, occurring either during or after the year-end, have a financial impact on this authority and, where appropriate, have included them in the accounting statements.	1		<i>disclosed everything it should have about its business activity during the year including events taking place after the year end if relevant.</i>
9. (For local councils only) Trust funds including charitable. In our capacity as the sole managing trustee we discharged our accountability responsibilities for the fund(s)/assets, including financial reporting and, if required, independent examination or audit.	Yes	No	N/A
			/

***Please provide explanations to the external auditor on a separate sheet for each 'No' response and describe how the authority will address the weaknesses identified. These sheets must be published with the Annual Governance Statement.**

This Annual Governance Statement was approved at a meeting of the authority on:

24/06/2025

and recorded as minute reference:

2 5 0 3

Signed by the Chair and Clerk of the meeting where approval was

Chair

Clerk

[Signature]
DECLARATION REQUIRED
DUB

www.blacksluiceidb.gov.uk

Black Sluice Audit & Risk Committee
Agenda Item 6

Section 2 — Accounting Statements 2024/25 for

Black Sluice Internal Drainage Board

	31 March 2024 £	Year ending 31 March 2025 £	Notes and guidance <i>Please round all figures to nearest £1. Do not leave any boxes blank and report £0 or Nil balances. All figures must agree to underlying financial records.</i>
1. Balances brought forward	1,741,746	1,645,695	Total balances and reserves at the beginning of the year as recorded in the financial records. Value must agree to Box 7 of previous year.
2. (+) Precept or Rates and Levies	2,982,916	3,216,349	Total amount of precept (or for iDBs rates and levies) received or receivable in the year. Exclude any grants received.
3. (+) Total other receipts	1,103,881	5,071,387	Total income or receipts as recorded in the cashbook less the precept or rates/levies received (line 2). Include any grants received.
4. (-) Staff costs	1,446,300	1,508,007	Total expenditure or payments made to and on behalf of all employees. Include gross salaries and wages, employers NI contributions, employers pension contributions, gratuities and severance payments.
5. (-) Loan interest/capital repayments	0	0	Total expenditure or payments of capital and interest made during the year on the authority's borrowings (if any).
6. (-) All other payments	2,736,548	3,937,623	Total expenditure or payments as recorded in the cash-book less staff costs (line 4) and loan interest/capital repayments (line 5).
7. (=) Balances carried forward	1,645,695	4,487,801	Total balances and reserves at the end of the year. Must equal (1+2+3) - (4+5+6).
8. Total value of cash and short term investments	2,175,328	5,140,702	The sum of all current and deposit bank accounts, cash holdings and short term investments held as at 31 March — To agree with bank reconciliation.
9. Total fixed assets plus long term investments and assets	6,741,237	6,845,668	The value of all the property the authority owns — it is made up of all its fixed assets and long term investments as at 31 March.
10. Total borrowings	0	0	The outstanding capital balance as at 31 March of all loans from third parties (including PWLB).

For Local Councils Only	Yes	No	N/A	
11a. Disclosure note re Trust funds (including charitable)				The Council, as a body corporate, acts as sole trustee and is responsible for managing Trust funds or assets.
11b. Disclosure note re Trust funds (including charitable)				The figures in the accounting statements above exclude any Trust transactions.

I certify that for the year ended 31 March 2025 the Accounting Statements in this Annual Governance and Accountability Return have been prepared on either a receipts and payments or income and expenditure basis following the guidance in Governance and Accountability for Smaller Authorities — a Practitioners' Guide to Proper Practices and present fairly the financial position of this authority.

Signed by Responsible Financial Officer before being presented to the authority for approval



Date

20/05/2025

I confirm that these Accounting Statements were approved by this authority on this date:

24/06/2025

as recorded in minute reference:

Signed by Chair of the meeting where the Accounting Statements were approved



Section 3 — External Auditor's Report and Certificate 2024/25

In respect of

Black Sluice Internal Drainage Board - DB0010

1 Respective responsibilities of the auditor and the authority

Our responsibility as auditors to complete a limited assurance review is set out by the National Audit Office (NAO). A limited assurance review is not a full statutory audit, it does not constitute an audit carried out in accordance with International Standards on Auditing (UK & Ireland) and hence it does not provide the same level of assurance that such an audit would. The UK Government has determined that a lower level of assurance than that provided by a full statutory audit is appropriate for those local public bodies with the lowest levels of spending.

Under a limited assurance review, the auditor is responsible for reviewing Sections 1 and 2 of the Annual Governance and Accountability Return in accordance with NAO Auditor Guidance Note 02 (AGN 02) as issued by the NAO on behalf of the Comptroller and Auditor General. AGN 02 is available from the NAO website — <https://www.nao.org.uk/code-audit-practice/guidance-and-information-for-auditors/>

This authority is responsible for ensuring that its financial management is adequate and effective and that it has a sound system of internal control. The authority prepares an Annual Governance and Accountability Return in accordance with *Proper Practices* which:

- summarises the accounting records for the year ended 31 March 2025; and
- confirms and provides assurance on those matters that are relevant to our duties and responsibilities as external auditors.

2 External auditor's limited assurance opinion 2024/25

On the basis of our review of Sections 1 and 2 of the Annual Governance and Accountability Return (AGAR), in our opinion the information in Sections 1 and 2 of the AGAR is in accordance with Proper Practices and no other matters have come to our attention giving cause for concern that relevant legislation and regulatory requirements have not been met.

Other matters not affecting our opinion which we draw to the attention of the authority:

None

3 External auditor certificate 2024/25

We certify that we have completed our review of Sections 1 and 2 of the Annual Governance and Accountability Return, and discharged our responsibilities under the Local Audit and Accountability Act 2014, for the year ended 31 March 2025.

External Auditor Name

PKF LITTLEJOHN LLP

External Auditor Signature



Date

22/09/2025

Black Sluice Internal Drainage Board

Policy No: 3

Financial Regulations Policy

Review Dates:

Original Issue	16 th January 2013
Board Approved	19 th November 2024

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 Chief Executive is appointed by the Board as the Responsible Financial Officer as required by the Local Government Act 1972, Section 151.
- 2.2 The Chief Executive 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 Chief Executive 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 Directors 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 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 Chief Executive 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 one of the Directors or the 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 and Admin Director 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 Chief Executive.
 - 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, volume permitting, these may be paid in using the Bankline App. 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 analysed by the Finance and Admin Director and then recorded ~~in the collection and deposit book~~ either in the drainage rate system or direct to Opera, the Board's computerised accounting system.
- 5.4 The Finance and Admin Director 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 Chief Executive 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 The Chief Executive can approve the write-off of Drainage Rates up to a value of £250.

- 5.7 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.
- 5.8 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 Projects Director.

6. INSURANCE

- 6.1 The Chief Executive and Directors, in consultation with responsible Officers initiate 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 Chief Executive or any of the Directors 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 Chief Executive 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 and Admin Director shall receive a weekly stock list from the Operations Supervisor detailing issues, receipts and balances of stock items.
- 7.2 The Finance and Admin Director 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 Maintenance Director shall ensure proper and safe custody of all stock.
- 7.4 The Finance and Admin Director shall keep an asset register. This shall record all assets above £5,000 in value. The Finance and Admin Director will carry out at least an annual physical check of assets.
- 7.5 Obsolete Equipment will, on the agreement of the Chief Executive and Capital Projects Director, 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 and Admin Director 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 and Admin Director shall be responsible for the payment of all, salaries, wages and other emoluments to all employees.
- 8.3 The Finance and Admin Director 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 and Admin Director 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 shall be authorised by the Executive Committee and Chairperson of the Board.
- 8.6 Any discretionary payments to employees over the Overtime limit will be authorised by the Chairperson of the Board.

9. TREASURY MANAGEMENT / BANKING ARRANGEMENTS

- 9.1 The Chief Executive 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 In accordance with Para 4 of the Investment Strategy; The Board resolved to invest £500,000 with Brewin Dolphin, an investment broker, at their risk level of “3” at the meeting of the Board on 30 May 2018. **This was amended to risk level “5” at the Executive Committee meeting on 16 September 2025 to maximise the potential of the investment.**
- 9.4 The Board only places deposits with financial institutions which are regulated by the Financial Conduct Authority.
- 9.5 Bank transactions and instructions must be authorised by two approved officers.
- 9.6 In relation to 9.4 above, the approved officers are: Chief Executive, Projects Director, Finance and Admin Director and Maintenance Director.
- 9.7 The Chief Executive and Capital Projects Director may hold a Business Chargecard, with a monthly limit of £5,000 for payment of expenses and Internet orders. The Maintenance Director and Finance & Admin Director may hold a business Chargecard, with a monthly limit of £2,500. Statements are to be certified by the Chief Executive every month. Projects Director to certify the Chief Executive’s statement. It is the bearer’s 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.
- 9.8 Small payments may be made by petty cash under the control of the Finance and Admin Director. All petty cash claims are to be recorded on a voucher supported by a receipt and authorised by the Finance and Admin Director or Chief Executive. The maximum amount of petty cash that may be held is £500. The Finance and Admin Director is to certify the analysis every month.
- 9.9 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;
- 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 Chief Executive 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 and Admin Director to inform the Chief Executive, Chairperson of the Board, and the Board's Auditor without delay.

BLACK SLUICE INTERNAL DRAINAGE BOARD

Policy No 15

EMPLOYEES CODE OF CONDUCT

1. INTRODUCTION

The Board's Code of Conduct is set out below. It covers the main standards of behaviour the Board requires from employees and includes the Board Rules, which employees need to follow.

The Board's Rules and the examples of misconduct are not exhaustive. All employees are under a duty to comply with the standards of behaviour and performance required by the Board and to behave in a reasonable manner at all times.

A breach of the Board's Rules may result in disciplinary action. A single instance of gross misconduct may result in dismissal without notice.

2. BOARD RULES

2.1 Attendance and Timekeeping

Employees are required to:

- a) comply with the rules relating to notification and certification of sickness as set out in the ADA Lincolnshire White Book;
- b) arrive at work promptly, ready to start work at their contracted starting times;
- c) remain at work until their contracted finishing times.

Employees must obtain management authorisation if for any reason they wish to arrive later or leave earlier than their agreed normal start and finish times.

The Board reserves the right not to pay employees in respect of working time lost because of poor timekeeping.

Persistent poor timekeeping may result in disciplinary action.

2.2 Standards and Conduct

Employees are required to:

- a) behave in a way that does not constitute unlawful discrimination;
- b) comply with all reasonable management instructions;
- c) comply with the Board's operating policies and procedures;
- d) co-operate fully with their colleagues and with management;

- e) maintain satisfactory standards of performance at work;
- f) ensure that any queries received from the media are referred immediately to the CHIEF EXECUTIVE. Employees must not attempt to deal with queries themselves;
- g) ensure the maintenance of acceptable standards of politeness;
- h) take all necessary steps to safeguard the Board's public image and preserve positive relationships with:
 - i) Local Authorities
 - ii) Members of the public
 - iii) Other associates
 - iv) Other Boards
 - v) Ratepayers of the District

2.3 Flexibility

Employees may be required:

- a) from time to time to undertake duties outside their normal job remit;
- b) from time to time to work at locations other than their normal place of work;
- c) to work additional hours at short notice, in accordance with the needs of the Board.

2.4 Confidentiality

Employees are required to keep confidential, both during their employment and at any time after its termination, all information gained in the course of their employment about the Board's business, members, colleagues or ratepayers, except as required by law or in the proper course of their duties.

Employees are not permitted to engage in any activity outside their employment with the Board, which could reasonably be interpreted, as competing with the Board, **without the express permission of the Chief Executive.**

2.5 Work Clothing and Personal Protective Equipment

Employees are required to:

- a) wear the appropriate clothing for the role in which they are employed;
- b) wear or use any personal protective equipment as instructed by and supplied by the Board.

2.6 Health and Safety

2.6.1 General

Employees are required to:

- a) report all accidents, however small, as soon as possible ~~to the Health and~~

- ~~Safety Officer~~; in accordance with the Board's H&S policy Para 3.8
- b) ~~Record all near misses in accordance with the Board's Near Miss Reporting Policy.~~
 - c) observe the Board's health and safety procedures;
 - d) ensure that safety equipment and clothing are always used in accordance with the Board's health and safety procedures;
- e) ensure lone-worker devices are used at all times in accordance with instructions and training provided.
- f) gain an understanding of the Board's health and safety procedures.
- g) ~~Immediately raise concerns with your immediate line manager if you have any Health and Safety concerns.~~

2.6.2 On Site Rules

Employees working on site are required to:

- a) follow any site-specific rules;
- b) wear any required Personal Protective equipment on site at all times.

2.6.3 Smoking & Vaping

In order to comply with the Law and Board policies, Employees **must not** smoke or vape or allow any non-employees to smoke or vape;

- a) in any of the Board's Buildings
- b) in any of the Board's vehicles
- c) anywhere on site or outside on the Board's premises where it would cause:
 - i) an unpleasant environment for non-smokers
 - ii) offence to others
 - iii) the harmful effects of second hand smoke to be experienced by others
 - iv) anywhere it would cause a fire risk

The designated smoking area for the offices and depot at Swineshead is located at the front of the building in the smoking shelter.

2.7 Property and Equipment

Employees must not without permission of the Chief Executive:

- a) Use the Board's telephone, ~~fax~~, postal or other services for any reason except on authorised Board's business.
- b) remove Board or site property or equipment from Board or site premises unless for use on authorised Board business

On termination of their employment employees must return **all** Board property, such as keys, laptops, mobile telephones, vehicles, documents or any other items belonging to the Board. This list is not exhaustive.

Where an employee damages property belonging to the Board, either through misuse or carelessness, the Board reserves the right to make a deduction

from the employee's pay in respect of the damaged property.

2.8 Personal Property

Personal possessions on Board premises are the sole responsibility of employees who should ensure that their personal possessions are kept in a safe place at all times.

2.9 Environment

In order to provide a cost-effective service, employees are requested:

- a) handle all materials with care;
- b) switch off equipment when it is not in use;
- c) to use the Board's equipment, materials and services wisely;
- d) to try to reduce wastage and the subsequent impact on the environment ensuring that they close windows, avoid using unnecessary lighting or heating or leaving taps running.

2.10 Changes in Personal Details

To ensure the prompt payment of monies due to you and ensure the Board is able to contact you or another designated person in case of an emergency, employee must notify the Board as soon as possible of any change of:

- a) name
- b) address
- c) marital status
- d) next of kin
- e) telephone number
- f) bank account (*which effects where monies due to you from the Board are received*)

2.11 Gross Misconduct

Examples of behaviour which the Board treats as misconduct can be found In the Lincolnshire Branch of ADA's Wages, Salaries and conditions of Service booklet provided to all employees.

Board Approved ~~25-November-2020~~

Black Sluice Internal Drainage Board

Policy No 16

Fraud and Corruption Policy

1. INTRODUCTION

One of the basic principles of public sector organisations is the proper use of public funds. It is therefore important that all those working in the public sector are aware of the risk of wrongdoing and the means of enforcing the rules against it. The aim of this document is to set out a policy and response plan for the organisation for suspected or detected irregularities.

2. POLICY

The Board is committed to a culture of honesty, openness and fairness. It is therefore also committed to the elimination of any fraud and corruption and to the rigorous investigation of any such cases and the punishment of those involved.

The Board actively encourages anyone having reasonable suspicion of irregularities to report them. It is also the policy of the Board that no employee should suffer as a result of reporting reasonably held suspicions.

The Board will always seek to recover fully all losses from those responsible in proven cases of fraud or corruption including all costs incurred in the pursuit of action against them.

3. DEFINITIONS

The Fraud Act 2006 introduced an offence of Fraud and Section 1 of this Act states the following;

Fraud

(1) A person is guilty of fraud if he is in breach of any of the sections listed in subsection (2) (which provide for different ways of committing the offence).

(2) The sections are—

(a) section 2 (fraud by false representation),

(b) section 3 (fraud by failing to disclose information), and

(c) section 4 (fraud by abuse of position).

(3) A person who is guilty of fraud is liable—

(a) on summary conviction, to imprisonment for a term not exceeding 12 months or to a fine not exceeding the statutory maximum (or to both);

(b) on conviction on indictment, to imprisonment for a term not exceeding 10 years or to a fine (or to both).

(4) Subsection (3)(a) applies in relation to Northern Ireland as if the reference to 12 months were a reference to 6 months.

Fraud can be defined as – “the intentional distortion of financial statements or other records by persons internal or external to the authority which is carried out to conceal the misappropriation of assets or otherwise for gain”.

Corruption can be defined as – “the offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person”.

4. DISCOVERY OF FINANCIAL IRREGULARITIES

Financial irregularities can come to light in a number of ways. They are usually discovered as a result of:

- Manual & Craft employees or Office Staff becoming aware of or suspecting that management controls are not being complied with;
- Routine work, or Audit testing;
- Information (tip-off) from a third party, internal or external to the organisation.

Any allegation, but particularly an anonymous one, should be treated with caution and discretion, because what appears to be suspicious circumstances may have a reasonable explanation. There is also a risk that some reports may be malicious.

Under no circumstances should information about any suspected irregularity, be passed to a third party or to the media without the **express authority** of the Chief Executive or Internal Auditor.

5. RESPONSIBILITY OF EMPLOYEES

Employees who are aware of, or suspect that a financial irregularity is taking place, or has taken place, have a duty to report their suspicions, since by doing nothing they may be implicating themselves.

Employees who may feel uncomfortable referring suspicions to line managers are encouraged to contact an Executive Committee Board Member or the Internal Auditor. If these reporting lines are unacceptable to an employee, an alternative is available in the Board's Whistle Blowing Policy.

If an employee suspects that a financial irregularity of any type has occurred or is in progress, they should immediately inform their line manager. The only exception to this rule is where the employee suspects that the *line manager* might be involved in the irregularity. In that event, the employee should advise the Chief Executive, Internal Auditor or an Executive Committee Board Member.

Employees must not attempt to investigate suspected irregularities themselves, or discuss their suspicions other than with more senior managers in accordance with the guidance above.

Examples of the types of financial irregularity that might be suspected are: -

Theft or abuse of Board property or funds

Deception or falsification of records (e.g. fraudulent time or expense claims)

6. RESPONSIBILITIES OF MANAGERS

It is Management's responsibility to maintain system controls to ensure that the Board's resources are properly applied in the manner, on the activities and within the limits approved. This includes responsibility for the prevention and detection of fraud and other irregularities.

Where a manager receives a report from an employee or other party of a suspected financial irregularity, they should immediately inform the Chief Executive, who in turn will notify the duly appointed Internal Auditor.

Line Managers should not themselves attempt to undertake any detailed investigation of the possible irregularity and should not discuss their suspicions or those reported to them, other than with the Chief Executive and the Internal Auditor.

In cases of suspected irregularities, it is often necessary to suspend a suspect from duty. Before an employee is suspended, advice should be sought from the Chief Executive. The purpose of suspension is to prevent any suggestion of a suspect having the opportunity to continue with the act complained of, falsify or destroy records, influence witnesses, etc. Suspension is not a punishment nor does it imply any fault or guilt on the part of the employee concerned.

7. RESPONSE PLAN

Upon receiving a report of suspected financial irregularity, the Internal Auditor will launch an investigation and a record will be made in the Board's Fraud Log. The Log will record all reported suspicions including those dismissed as unsubstantiated, minor or otherwise not investigated. It will also contain details of actions taken and conclusions reached. Significant matters will be reported to the Board and the Chairman will be updated on the situation.

The Internal Auditor will confer with the Chief Executive to agree the action plan to be adopted in the light of the particular circumstances.

When a prima facie case of fraud or corruption has been established, the Internal Auditor and Chief Executive will inform the Chairman and consultation with the Police will take place as soon as possible.

Depending upon Police advice, the case will be reviewed by the above officers and the Chairman who will decide if it should be referred officially to the Police for investigation. If it is decided to do so the Chief Executive will authorise the official complaint.

Following the official report to the Police, any further investigations by the Internal Auditor that are considered necessary will be planned and executed in close co-operation with the Police, with the Chief Executive and Chairman of the Board being kept informed.

8. INVOLVING THE POLICE

Internal Auditors and Chief Executives may be reluctant to involve the Police in the belief that: -

- They are only interested if the alleged criminal offence is greater than a specific monetary value
- They will not be interested because of the potential complexity of the issues involved which render little chance of a successful prosecution
- The organisation prefers to deal with such incidents internally, avoid publicity but implementing dismissal and recovery through civil action
- The Police will want hard evidence before they will pursue investigations, but when it is provided they advise that the rules of evidence have not been complied with.

Protracted internal investigations often unnecessarily delay involving the Police, thereby diminishing the value of co-operation with them. However properly organised investigations, conducted by individuals with an inside working knowledge of the organisation, will be of great assistance to any subsequent Police enquiry, and management should follow the above procedure and liaise with the Police as soon as the issues are identified.

Telephone Contacts:

Chief Executive: 01205 821440

Internal Auditor: **Lighthouse Consulting**
Steve.forsyth@lhucuk.com
07535711436

Revised ~~14 October 2020~~

Board Approved ~~25 November 2020~~

Black Sluice Internal Drainage Board

Policy No 20

Officers Car Loan Policy & Electric Car Scheme

1. INTRODUCTION

Employees of the Board who are paid an Essential Car User Allowance and have in their terms of employment the requirement that they should provide a car to use for their employment can request a loan for the purchase of a suitable vehicle.

2. POLICY

Any **employee** can apply for a loan after one month's employment by the Board.

The loan shall be limited to 90% of the cost of the vehicle.

Simple interest shall be paid at a minimum of 1% or 1% above the Bank of England Base Rate, whichever is the greatest when the loan is taken out, and be fixed for the term of the loan.

The maximum term of the loan should be four years.

The loan shall be repaid by deductions from the Officers pay each month.

3. RESPONSIBILITY OF EMPLOYEES

If the **employee** leaves the Board's employment he/she shall repay the entire loan before the final day of that employment.

4. RESPONSIBILITIES OF MANAGERS

The agreement shall be signed by the Chief Executive and reported to the next meeting of the Board Executive Committee.

5. ELECTRIC CAR SALARY SACRIFICE SCHEME SUMMARY

Employees may participate in the Board's Electric Car Salary Sacrifice Scheme, through The Electric Car Scheme, provided they meet eligibility criteria in accordance with HMRC guidelines. This scheme allows employees to lease a brand-new electric vehicle (EV) by sacrificing a portion of their gross salary in exchange for the non-cash benefit of an EV.

Revised ~~14 October 2020~~

Board approved ~~25 November 2020~~

THIS AGREEMENT is made the day of Two Thousand and nine BETWEEN(full name) of(Address) (hereinafter called "the Officer") of the one part and BLACK SLUICE INTERNAL DRAINAGE BOARD (hereinafter called "the Board") of the other part.

WHEREAS:

1. The Officer is employed by the Board.
2. The Board consider that it is essential in the interests of the efficient conduct of the business of the Board that the Officer shall be permitted to use his private motor car in carrying out his official duties.
3. The Board have been requested by the Officer to make an advance to the Officer to enable him to complete the purchase of a motor car.
4. The Board have agreed to advance to the Officer the sum of £.....(numbers) (typed in words) for the said purchase upon the terms and conditions hereinafter contained.

NOW IT IS HEREBY AGREED as follows:-

1. IN consideration of the sum of £..... paid to the Officer by the Board on the (date) (the receipt whereof the Officer hereby acknowledges) the Officer shall repay to the Board the said sum of £..... together with interest thereon at the rate of% fixed on the loan by equal monthly instalments of £..... per month until the whole of the said sum of £..... together with interest thereon as aforesaid has been repaid the first instalment being due on the 1st day of (date).
2. THAT if before the whole of the said sum of £..... and interest has been repaid to the Board by the Officer as aforesaid the Officer shall:-
 - 2.1. Dies; or
 - 2.2. Cease to serve the Board for any reason whatsoever; or
 - 2.3. Fail to observe any term or terms of this deed; or
 - 2.4. Become bankrupt; or make any composition or arrangement with his creditors.
3. IN the event of any balance of the said sum of £..... becoming repayable as provided under Clause 2 thereof the Board shall in addition to exercising all other legal or equitable rights and remedies be entitled to deduct such balance from any sum that may be or become due to the Officer whether by way of salary refund or superannuation contributions or otherwise.

4. THE Board may affect with an Insurance Company a fidelity guarantee bond for the due performance by the Officer of his obligations under this deed and the Officer will repay to the Board the premium required in connection therewith.
5. THE Officer shall keep the Motor Car and all parts thereof in good repair condition and working order (reasonable wear and tear only excepted).
6. EXEMPT when the Motor Car is receiving necessary repairs or over hauls the Officer shall during the continuance of this Agreement utilise the Motor Car in the performance of his official duties as required by the Board.
7. THE Officer shall during the continuance of this Agreement maintain a comprehensive policy of insurance covering the Motor Car with an approved Insurance Company and shall whenever requested so to do by the Board produce such policy of insurance and the last receipt for this premium for inspection.
8. THE Officer shall be solely responsible for the Motor Car and for any accidents or injuries arising to himself or third parties by reason of the user thereof and hereby indemnifies the Board against all proceedings costs and claims demands or liability whatsoever in respect of any claims howsoever arising or through any default in repayment of the loan or through the breach of non-performance of any of the terms of this Agreement.
9. THE Officer may at any time during the subsistence of this Agreement on the last day of any calendar month repay to the Board any balance of the said sum of £..... or part thereof with interest.
10. THE Board shall be entitled to deduct the above mentioned monthly instalments of loan and interest and the fidelity bond premium or any other monies due hereunder from the salary or other monies from time to time due from the Board to the Officer.

SIGNED, SEALED and DELIVERED by

THE said(full name)

In the presence of:

Black Sluice Internal Drainage Board

Policy No: 30

Local Government Pension Scheme Discretions

Statement

Scheme Employers

Review Dates:

Reviewed	
Board Approved	

INTRODUCTION

Under *Regulation 60 (statements of policy about exercise of discretionary functions) of the LGPS Regulations 2013* and *paragraph 2(2) of Schedule 2 of the LGPS Transitional Regulations 2014*, employers are required to make and publish policy statements on how they will exercise **five specific mandatory discretions**.

In addition there are **two further discretions** relevant to employers, which relate to members who left before 1 April 2014. These are under *Regulation 66 of the Local Government Pension Scheme (Administration) Regulations 2008* (in respect of leavers between 1 April 2008 and 31 March 2014) and under *Regulation 106 of the LGPS Regulation 1997* (in respect of leavers between 1 April 1998 and 31 March 2008).

Any policy statements made must not limit, or 'fetter' how an employer uses any of the discretions afforded by the scheme.

The use of any discretion is likely to lead to immediate and potentially continuing increased pension costs for the employer, which could be considerable.

The employer is required to keep its statement under review and make such revisions as are appropriate following a change in its policy. Following any changes in its policy the employer must publish the revised policy and send a copy to the administering authority within one month of the date the policy is revised.

In formulating and revising the policy statements outlined below, the employer must have regard to the extent to which the exercise of its discretionary powers could lead to a serious loss of confidence in the public service.

The discretions listed below are those that require a written policy, however employers have further discretions under the regulations that they may wish to formulate a written policy on.

FURTHER GUIDANCE FROM THE LOCAL GOVERNMENT PENSION SCHEME SECRETARIAT

When formulating any policies Scheme Employers should also take into account information provided by the LGPC Secretariat which can be found [here](#):

SCHEME EMPLOYER DISCRETIONS

Specific discretions under the LGPS Regulations 2013 and the LGPS Transitional Regulations 2014.

Details of the **five discretions** available are as follows:

1. Shared cost Additional Pension Contributions (SCAPC) - Regulation 16 (2)(e) and 16 (4)(d)

Note: Where an active member pays Additional Pension Contributions by regular or lump sum contribution to purchase extra annual pension, an employer can choose to voluntarily contribute towards the cost of purchasing that extra pension through a SCAPC

The employer does not consider contributions towards additional pension contributions to be an essential part of its employment strategy. However, **the employer** will consider applications made under these specific provisions having regard to **the employer's** general policy from time to time, on the employee pay strategy and the particular circumstances surrounding each case.

It is likely that decisions will be made on the merits of each case having particular regard to factors such as:

- **the employer's** ability to meet the cost of granting such a request; and/or
- the member's personal circumstances.

2. Awarding Additional Pension - Regulation 31

*Note: An employer can choose to grant additional pension up to the maximum allowed by the scheme rules provided that the member is active **or** is within 6 months of leaving **for reasons of redundancy or business efficiency or** whose employment was terminated by mutual consent on grounds of business efficiency.*

Employers may wish to use this Regulation as an aid to recruitment, an aid to retention or to compensate or reward an employee who is retiring.

*Employers should also consider provisions of this Regulation, in particular Regulation 31(4), if they decide to exercise their power under **Section 1 (general power of competence) of the Localism Act 2011.***

The employer will consider applications made under this *Regulation* having regard to the particular circumstances surrounding each case. Decisions will be made on the merits of each case having particular regard to the following:

- the member's personal circumstances;
- the interests of **the employer**;
- the additional contributions due to the Fund by **the employer** in respect of the exercise of this discretion;

- any potential benefits or savings to **the employer** arising from the exercise of this discretion;
- other options that are, from time to time, available under **the employer's** severance arrangements;
- the funding position of **the employer** within the Fund;
- the ability of **the employer** to meet the cost of granting such an award.

3. Flexible Retirement - Regulation 30(6)

Note: An employer can decide whether to permit a member who has attained the age of 55 to draw all or part of their retirement benefits (both pension and lump sum) whilst continuing in employment and Fund membership provided that:

- *there has been a reduction in hours, or*
- *a reduction in grade.*

An employer may agree to waive in whole or in part any actuarial reductions that would be required (see below: Regulation 30(8)).

The employer will consider applications made under this Regulation having regard to the particular circumstances surrounding each case. Decisions will be made on the merits of each case having particular regard to:

- the operating requirements of the employing department
- **the employer's** ability to meet the cost of granting such a request
- whether any demonstrable cost saving in excess of potential savings available under any severance arrangements in place **from** time to time can be made
- the member's personal circumstances.
- whether to permit the member to choose to draw all, part or none of the pension benefits they have built up after 1 April 2008.

4. Waiving actuarial reductions - Regulation 30(8)

Note: An employer may agree to waive in whole or in part the actuarial reductions that would be required:

- *all of the reductions in respect of pre 1 April 2014 benefits but only on compassionate grounds (paragraph 2 of Schedule 2 of the LGPS Transitional Regulations 2014);*
- *all or some of the actuarial reduction in respect of post 1 April 2014 on any grounds.*

Where 85 year rule protections exists and the member has full or tapered protection the employer can waive all of the reductions but only on compassionate grounds for the service up to the date the 85 year rule protection ends (31 March 2016 (full) or 31 March .2020 (tapered)).

The employer, will consider applications made under this Regulation having regard to the particular circumstances surrounding each case. Decisions will be made on the merits of each case having particular regard to:

- **the employer's** ability to meet the cost of granting such a request

- whether any demonstrable cost saving in excess of potential savings available under any severance arrangements in place from time to time can be made
- the member's personal circumstances

Applications for the payment of unreduced benefits for service before 1 April 2014 on the grounds of compassion will be granted if:

- in **the employer's** sole opinion, the special extenuating circumstances surrounding the application, along with the supporting evidence provided justify approval and
- **the employer** can meet the cost of granting such a request.

5. Switching on the 85 rule – Schedule 2 - 1(1)(c) of the LGPS Transitional Regulations 2014

Note: An employer can decide whether to “switch on” the 85 year rule to allow members who have protections under old regulations, and who choose to voluntarily draw their benefits on or after age 55 and before age 60 to receive benefits either unreduced or with a smaller reduction to their 85 year rule date. The employer will be responsible for meeting any strain costs relating to benefits being paid before age 60. If the employer does not “switch on” the 85 year rule the member’s benefits will be reduced to age 60 or the date they meet the 85 year rule if later.

The employer, will consider applications made under this Regulation having regard to the particular circumstances surrounding each case. Decisions will be made on the merits of each case having particular regard to:

- **the employer's** ability to meet the cost of granting such a request;
- whether any demonstrable cost saving in excess of potential savings available under any severance arrangements in place from time to time can be made;
- the member's personal circumstances.

Further discretions under the LGPS Regulations 1997 and the LGPS Benefits Regulations 2007

There are also two other discretions for employers but these relate specifically to members who left before 1 April 2014.

Whilst the LGPS Regulations 2013 repeals the LGPS Regulations 1997 and the LGPS Benefits Regulations 2007 (in so far as they had not already been repealed), Regulation 3(1) of the LGPS (Transitional Provisions, Savings and Amendment) Regulations 2014 allows for the LGPS Regulations 1997 and the LGPS Benefits Regulations 2007 to still have effect in so far as they relate to certain member benefits before 1 April 2014. As such, the other discretions still available for certain members only, are as follows:

1. Early Payment of Deferred Pensions for members who left before 1st April 2014 – Regulation 2 of the LGPS (Transitional Provisions, Savings and Amendment) Regulations 2014, Regulation 30(2) and 30(5) of the LGPS Benefits Regulations 2007 & Regulation 31(2) and Regulation 31(5) of the LGPS Regulations 1997

Note: From 14 May 2018, all deferred members may voluntarily elect for early payment of their deferred benefits prior to their Normal Retirement Date. An employer can decide on compassionate grounds whether to waive any actuarial reduction to benefits paid before age 65. An employer can decide whether to ‘switch on’ the 85 year rule where a member has taken voluntarily early payment of deferred benefits from age 55.

The employer, will consider applications made under this Regulation having regard to the particular circumstances surrounding each case. Decisions will be made on the merits of each case having particular regard to:

- **the employer's** ability to meet the cost of granting such a request
- the member's personal circumstances

Applications for the payment of unreduced benefits on the grounds of compassion will be granted if:

- in **the employer's** sole opinion, the special extenuating circumstances surrounding the application, along with the supporting evidence provided justify approval and
- **the employer** can meet the cost of granting such a request.

N.B. Deferred members who left the Scheme before 1 April 2008 can still make application for the early payment of their deferred benefits after age 50 under LGPS rules. However, under HMRC rules such payments would be classed as 'un-authorised' and would be subject to a punitive tax charge.

2. Early Payment of Deferred Pensions for members who left before 1st April 2014 and have ceased to be entitled to a tier 3 ill benefit - Regulation 2 of the LGPS (Transitional Provisions, Savings and Amendment) Regulations 2014, Regulation 30A(3) and 30A(5) of the LGPS Benefits Regulations 2007.

An employer can decide whether to grant early payment to members who have ceased to be entitled to a tier 3 ill health benefit and who are over the age of 55 An employer may on compassionate grounds agree to waive any actuarial reduction to An employer can decide whether to 'switch on' the 85 year rule where voluntary early payment of suspended tier 3 ill health pension is taken.

The employer, will consider applications made under this Regulation having regard to the particular circumstances surrounding each case. Decisions will be made on the merits of each case having particular regard to:

- the employer's ability to meet the cost of granting such a request
- the member's personal circumstances

Applications for the payment of unreduced benefits on the grounds of compassion will be granted if:

- in **the employer's** sole opinion, the special extenuating circumstances surrounding the application, along with the supporting evidence provided justify approval and
- **the employer** can meet the cost of granting such a request.

Black Sluice Internal Drainage Board

Policy No 42

Near Miss Reporting Policy

1. INTRODUCTION

A near miss is an unplanned event that did not result in injury, illness or damage but had the potential to do so. 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 associated with near miss events.

2. RESPONSIBILITIES OF MANAGERS

You must ensure that the work areas, and activities, for which you have responsibility, have an approved Risk Assessment, method statement, safe system of work and COSHH assessment in place, as required, and potential for near miss events has been avoided so far as is reasonably practicable.

You must ensure that all employees report near miss events. Minimal or no reports suggest people are not completing the reports due to a lack of understanding of relevance.

You must ensure reports of near misses are acted upon with further training or an amended task Risk Assessment, method statement, safe system of work and COSHH assessment, as required, to reduce potential future events.

Repeated issues must be acted upon with some urgency in identifying the reason for risk and the method by which it can be removed.

All Near Miss Reports are to be reported and considered by the Health and Safety Committee and the November meeting of the Board, as part of the Annual Health and Safety report.

3. RESPONSIBILITY OF EMPLOYEES

You must adhere to the Risk Assessment method statement, safe system of work and COSHH assessment, as required, for the specific task, using the appropriate equipment.

You must report any near miss events to your line manager using the form provided.

Board Approved ~~25 November 2020~~

Black Sluice Internal Drainage Board

Near Miss and Hazard Alert Report Form

Near Miss is an occurrence that has not resulted in any injury or damage, but easily could have done.

Hazard Alert is notification of unsafe plant, equipment, substances, procedures etc. or unsafe behaviour.

Drainage Board..... Date.....

Location of Near Miss Incident / Hazard.....

Brief description of Near Miss Incident / Hazard and any actions taken

.....
.....
.....

Your idea(s) to eliminate the problem

.....
.....

When was the Near Miss Incident / Hazard first identified?

Date..... Time.....

Reported by.....

Please ensure that your Manager or Supervisor receives this information

Thank you for your support

To be completed by Supervisor or Manager and handed to Office

Corrective Action taken.....

.....

Date of Action Taken..... Name.....

CATALOGUE OF BOARD POLICIES																							
		Review Period / Years	Last review											To be reviewed									
			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	Apr-27	Sep-27	Apr-28	Sep-28	Apr-29	Sep-29	Apr-30
	Management Accounts	3			✓						✓						✓						
	Annual Accounts	3				✓						✓						✓					
A	Policy Statement Water Level & Flood Risk Management	5							✓										✓				
B	BSIDB Byelaws	5				✓										✓							
1	Risk Management Strategy	1	✓		✓		✓		✓		✓		✓		✓		✓		✓		✓		✓
2	Risk Register	N/A	To be reviewed at every Board and A&R meeting																				
3	Financial Regulations	3			✓				✓	✓		✓		✓						✓			
4	Procurement Policy	3				✓		✓	✓	✓						✓						✓	
5	Investment Strategy	5	✓								✓									✓			
6	Insurance Arrangements	3				✓	✓						✓						✓				
7	H&S Policy (50 pages)	3	Not previously reviewed by Board								✓					✓							
7a	Black Sluice IDB H&S Booklet	3	Not previously reviewed by Board									✓				✓							
8	Relaxation of Board Byelaw No 10 (the 9m byelaw)	N/A				✓							To be reviewed by the Strucutres Committee										
9	Structures Replacement	N/A	To be reviewed annually by Structures Committee																				
10	Delegation of Authority	3					✓				✓						✓						
11	Biodiversity Action Plan	N/A	To be reviewed annually by Environment Committee																				
12	Standing Orders	N/A	✓	No review required																			
13	Emergency Flood Response Plan	5	✓			✓					✓										✓		
14	Complaints Procedure	5										✓										✓	
15	Employees Code of Conduct	5		✓										✓									
16	Fraud and Corruption	5		✓										✓									
17	Members Code of Conduct	5					✓										✓						
18	Whistle Blowing Confidential Reporting Code	5					✓										✓						
19	Anti Bribery	5					✓										✓						
20	Officers Car Loan	5		✓										✓									
26	Young Persons Safety at Work policy	5										✓									✓		
27	Control of Ragwort	N/A									✓	To be reviewed by Environment Committee											
28	Land Drains discharging into Board Maintained Watercourse	5									✓										✓		
29	Control of Rabbits, Rats & other Rodents	5									✓										✓		
30	Pension Discretion LPF 2014	3						✓						✓						✓			
31	Publication Scheme	5									✓										✓		
32	Data Protection	5							✓										✓				
33	Smoking Policy	5											✓										✓
34	Gift and Hospitality	5									✓										✓		
35	Fire Management Plan	5	✓										✓										✓
39	Wearing of seat belts in Boards vehicles	5											✓										✓
40	Commercial Works	5										✓										✓	
41	Public Sector Co-operation Agreement	5								✓										✓			
42	Near Miss Reporting	5		✓										✓									
43	Electronic Information and Communication Systems	5					✓			✓										✓			
44	Development Control Charges and Fees Policy	5										✓										✓	
45	Mobile Phones & Devices	5										✓										✓	
46	Crop Loss Compensation	5					✓	(NW &SW)								✓							
48	Substance and Alcohol Misuse	5	New policy Sep 2022						✓									✓					
49	Health and Wellbeing	5	New policy April 2023							✓									✓				
50	Sickness absence management	5	New policy April 2023							✓									✓				
51	Drone Flying	5	New Policy Septemeber 2023								✓									✓			
52	Biosecurity	N/A	To be reviewed by Environment Committee																				

BLACK SLUICE INTERNAL DRAINAGE BOARD
AUDIT & RISK COMMITTEE 28TH OCTOBER 2025
AGENDA ITEM 9

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	Medium	6		
	1.1	(c) Flooding from failure of IDB pumping stations or excess rainfall	High	Medium	6		
	1.1	(d) Flooding from sewers or riparian watercourses	Medium	Low	2		
	1.2	Risk of loss of reputation or being found negligent due to Emergency Action	Medium	Medium	4		
	1.3	Loss of Electrical Supply	High	Low	3		
	1.4	Risk of failure of Board's Pumping Stations	High	Medium	6		Maintenance
	1.5	Board Watercourses being unable to convey water	Medium	Medium	4		Maintenance
	1.6	Operating machinery to maintain watercourses	Medium	Low	2		Training
	1.7	Claims from third parties for damage to property or injury	Medium	Low	2		
	1.8	Third Parties damage to Board maintained assets	Medium	Low	2		
	1.9	Unplanned loss of senior staff	Medium	Medium	4		
	1.10	Insufficient finance to carry out works	High	Medium	6		
	1.11	Reduction in staff performance	Medium	Low	2		
	1.12	Insufficient staff resources	Medium	Low	2		Review
To conserve and enhance the environment wherever practical and possible to ensure there is no net loss of biodiversity.	2.1	Prosecution for not adhering to environmental legislation	Medium	Low	2		BAP
	2.2	Non delivery of objectives	Low	Low	1		BAP
To provide a 24 hour/365 day emergency response for the community	3.1	Emergency Plan inadequate or not up to date	Low	Low	1		Review
	3.2	Insufficient resources (Staff and Equipment)	Medium	Low	2		Review
	3.3	Critical Incident loss of office	High	Low	3	None	
To provide a safe and fulfilling working environment for staff.	4.1	Injury to staff and subsequent claims and losses	Medium	Low	2		Training
	4.2	Not complying with Health and Safety legislation	High	Low	3		Consultant
To maintain financial records that are correct and comply with all recommended accounting practice.	5.1	Loss of cash	Low	Low	1	None	
	5.2	Loss of money invested in building societies, banks and managed funds	High	Low	3	None	
	5.3	Fraud by senior officers	Low	Low	1	None	
	5.4	Inadequacy of Internal Checks	Medium	Low	2		
	5.5	Fraudulent use of credit cards	Low	Low	1		
To ensure that all actions taken by the Board comply with all current UK and EU legislation	6.1	Board Members in making decisions	Low	Low	1		
	6.2	Not complying with all employment regulations and laws	Medium	Low	2		
A cost efficient IDB that provides a Value for Money service.	7.1	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 inc. risk of virus being introduced to network	High	Medium	6		
	8.6	Network Security Breach	High	Low	3		
	8.7	Loss of accounting records	Low	Low	1	None	
	8.8	Loss of rating records	High	Low	3	None	

Updated / Reviewed: 24 June 2025