

Compliance Board - Risk Register. To be reviewed at each meeting

Key:

Impact	5	Catastrophic	5	10	15	20	25
	4	Major	4	8	12	16	20
	3	Moderate	3	6	9	12	15
	2	Minor	2	4	6	8	10
	1	Negligible	1	2	3	4	5
Score		Rare	Unlikely	Possible	Likely	Very Likely	
		1	2	3	4	5	
Likelihood							

Context: This Risk Register is concerned with the delivery of the action plan constructed in response to Pennington report. It does not consider any risks within the report as Penningtons have addressed these, within their report and have prioritised the recommended actions accordingly.

REF	RISK OWNER	RISK DESCRIPTION	POTENTIAL	EXISTING MITIGATING CONTROLS	RISK RATING			PROPOSED FURTHER MITIGATION	RISK RATING		
					LIKELIHOOD	IMPACT	OVERALL RISK RATING		LIKELIHOOD	IMPACT	OVERALL RISK RATING
1	Board	Action plan is not accurate	Significant harm to tenants/leaseholders and buildings. Reputational damage, Prosecution	Penningtons are highly qualified with a strong reputation in this field	1	1		Consideration to be given to engage an external auditor, independent from Pennington, near to completion of project	1	1	
2	Board	Failure to deliver the plan	Significant harm to tenants/leaseholders and buildings. Reputational damage, further sanctions by the regulator and potential for prosecution in the event of failures	New plan and therefore there are no existing controls	4	5		Plan contains milestones and target dates Board reports directly and on a monthly basis to the Asset Compliance Audit & Scrutiny Committee Additional resources have been recruited and training provided to SLT , Cabinet and Asset Compliance	1	3	

3	Board	Progress to deliver the plan is slower than anticipated	Significant harm to tenants/leaseholders and buildings. Reputational damage, Prosecution	New plan and therefore there are no existing controls	4	5		Plan contains milestones and target dates Board reports directly and on a monthly basis to the Asset Compliance Audit & Scrutiny Committee Additional resources are being recruited	1	3	
4	Board	Improvement is not appropriately targeted to the highest priority first.	Significant harm to tenants/leaseholders and buildings. Reputational damage, Prosecution	Penningtons report has prioritised its recommendations	3	3		Action plan has been prioritised. Fire, Gas and Lift safety identified as critical areas for action first. Action plan to be cross checked with Penningtons report. Regular progress reports	1	1	
5	Board	Incidents are not reported to management	Inadequate management response Board unable to fulfil its obligations. Reputational damage	New plan and therefore there are no existing controls	4	5		Incident reporting mechanisms to be established and reported to the Board.	1	3	
6	Board	Unknown performance against all of the compliance areas	Inadequate management response Board unable to fulfil its obligations. Reputational damage	New plan and therefore there are no existing controls	5	4		Needs visibility of performance and progress - a dashboard. The dashboard needs to be visible to appropriate officers and board members	1	1	
7	Board	Data is incorrect and cannot be relied upon	Inadequate management response Board unable to fulfil its obligations. Reputational damage	New plan and therefore there are no existing controls	3	5		A data validation exercise is recommended by Penningtons and is contained within the action plan	1	1	
8	Board	Operational capacity insufficient to enable the Board to effectively function and deliver the action plan	Inadequate management response Board unable to fulfil its obligations. Reputational damage	New plan and therefore there are no existing controls	4	4		Gaps in resources are being identified and are in the process of being recruited to. A Project Management team is being put in place	2	2	

9	Board	The Board is not competent to provide required leadership.	There are a number of variables that can impact the company adversely	An external independent sector specialist has been invited to sit on the board and has accepted	3	4		Penningtons training booked for board members 29.11.23	1	1	
10	Board	Senior officers and those responsible for compliance or other health and safety work are not trained or competent.	Inadequate management response Board unable to fulfil its obligations. Reputational damage	New plan and therefore there are no existing controls	3	4		Penningtons training booked for 29.11.23. Appropriate senior level IOSH H&S training for senior staff to be progressed. Development of Competence matrix included in action plan	2	3	
11	Board	Training is not provided to new members or refresher training for existing Members as regualtions and best practise develops.	Inadequate Member understanding impacting on scrutiny and decision making process	New plan and therefore there are no existing controls	3	4		Need for regular training identified in risk register	2	3	
12	Board	Cabinet are not competent to provide the appropriate governance	Inadequate management response Board unable to fulfil its obligations. Reputational damage	New plan and therefore there are no existing controls	3	4		Penningtons training booked for 29.11.23	2	2	
13	Board	Lack of/poor communications between the levels, within the levels and internally/externally	Significant harm to tenants/leaseholders and buildings. Reputational damage, Prosecution	New plan and therefore there are no existing controls	3	3		Regular and frequent reporting to Cabinet and to the Asset Compliance Audit & Scrutiny Committee Standing item on SLT and Managers Forum meetings Communications plan in place for Tenant and leaseholder communications All relevant information on the web and updated following each Board meeting.	1	1	
14	Board	The risks associated with the Penningtons report and actions plan are not captured, the captured risks are not complete.	Significant harm to tenants/leaseholders and buildings. Reputational damage, Prosecution	New plan and therefore there are no existing controls	5	4		A risk register in place reviewed and updated as a standing board item. Significant business risk separated and given a high priority over other risks. Penningtons are asked to review the risk register . Consider engaging an external auditor, independent from Pennington, near to	1	1	

15	Board	Poor communication with Tenants and Leaseholders	Reputational damage	New plan and therefore there are no existing controls	4	4		Letter to T&L setting out position sent on 8.11.23 Communications plan to be drafted and approved by the Board. Updates provided to T&L provided following each Board meeting Full information disclosed to tenants on the website for transparency	3	3	
16	Board	Reputational Damage or loss of confidence including community concerns	Reputational damage. Overwhelming numbers of enquiries. Significant press interest Known tenants of concern introduce additional noise into the system	Existing reputation and good relationship with tenants and leaseholders	4	4		Communications plan Member and MP briefings and communications Briefing and preparation for key staff and housing teams	3	3	
17	Board	Key staff leaving or being absent for a period of time	Significant harm to tenants/leaseholders and buildings. Reputational damage, Prosecution	Ability to bring in agency or additional staff as necessary although delays still occur Employee Assistance programme	3	3		Additional resourcing requirements to be put in place. Chris and Darren to speak with key staff to provide reassurance Heads of Service to hold team meetings to provide reassurance Project team to have regular communications and reassurance Regular and frequent check-ins with key staff to assess wellbeing Deputies and buddying system to be put in place	2	2	

18	Board	Financial impact of compliance and fire safety works on the Housing Revenue Account	Significant detrimental impact of HRA which may impact of finite resource and ability to meet other statutory obligations relating to the housing stock	Regular financial monitoring and careful procurement and cost control whilst meeting all compliance obligations	4	4		Compliance Team, Fire Safety Group and Compliance Board to have overview of costs including through monthly financial monitoring with relevant Finance accountancy team	3	3	
19	Board	Increased risk of no win no fee claims	Increased costs in damages, legal fees, surveyors and administrators to handle claims. Reputational damage.	New plan and therefore there are no existing controls	4	4		Within the tenant and leaseholder communication plan, develop approaches to guide tenants to contact the Council if they have concerns with their property.	3	3	