

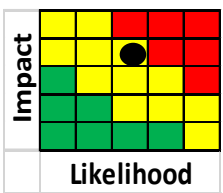
# **Housing Services Risk Register**

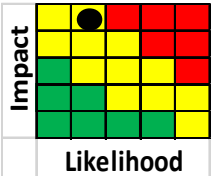
**July 17<sup>th</sup> 2019**

Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Action(s)	Officer	Resource	Due Date	Residual Risk Rating
1. Inadequate staffing resources	<ul style="list-style-type: none"> <li>Inability to recruit/retain staff</li> <li>Uncompetitive salaries and terms &amp; conditions</li> <li>Poor working environment</li> <li>Poor management of staff</li> <li>Increasing sickness levels</li> <li>Heavy workloads</li> <li>Low morale</li> <li>Inadequate training</li> </ul>	<ul style="list-style-type: none"> <li>Failure to meet statutory/regulatory obligations</li> <li>Inability to provide services at normal levels</li> <li>Pressure on remaining staff leading to deterioration in staff morale</li> <li>Complaints/Legal action/strike action</li> <li>Additional costs to employ temporary staff</li> <li>Reputational damage</li> </ul>	<ul style="list-style-type: none"> <li>Terms &amp; conditions review</li> <li>The Service Area Crisis Plan has been updated to ensure sufficient plans are in place to maintain service in the event of significant loss of staff or systems</li> <li>Delay in the VARF process</li> <li>Mobile (home) working practices in place</li> <li>Potential to apply a market supplement</li> </ul>	1.1 Identify posts where recruitment/retention issues and consider new job evaluation, Revaluation of lifeline completed. Monitoring homeless & HA officers delay in VARF Housing management review required.	HMT	Staff time	March 2020	<p>Impact</p> <p>Likelihood</p>
				1.2 Investigate the opportunity for implementing further mobile working arrangements so that we have a more flexible workforce and working arrangements.	HMT	Staff time – Income and Tenancy teams to trial mobile offer	March 2020	
				1.3 Ensure all appraisals and PDPs have been completed.	HMT	Staff time	Annual Action	
				1.4 Ensure that home workers are adequately managed.	HMT	Staff time	Ongoing	
				1.5 Review Service Area Crisis Plan.	HMT	Staff time	Ongoing	
				1.6 Finalise the overall structure for the housing management team.	HMT	Staff Time	Dec 2019	

Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Action(s)	Officer	Resource	Due Date	Residual Risk Rating
2. Insufficient financial resources to sustain the services (HRA and General Fund)	<ul style="list-style-type: none"> <li>Unexpected cuts in sources of finance</li> <li>Major uninsured or uninsurable incident</li> <li>Poor budget management</li> <li>Increasing costs</li> <li>Significant variances in the assumptions that underpin the Business Plan</li> <li>High value void levy</li> <li>Mandatory rent reduction 2016 – 2020</li> <li>Changes to government regulations and legislation</li> <li>Increase in the rent not being collected due to 53 weeks Mondays in the financial year</li> </ul>	<ul style="list-style-type: none"> <li>Reduction in staffing levels</li> <li>Low morale among staff</li> <li>Inability to deliver services</li> <li>Increased complaints</li> <li>Reputational damage</li> <li>Reduction in Services</li> <li>Reduction in the delivery of new homes</li> <li>Rent more difficult to collect.</li> </ul>	<ul style="list-style-type: none"> <li>Regular budget monitoring and early warning systems for any unexpected major expense or drop in income.</li> <li>Early contact with insurance Officer.</li> <li>Regular review of business plan performance and environmental budgets which is reported to Finance and Audit Scrutiny Committee bi-annually</li> <li>Business Plan is updated annually and reported to Executive for approval</li> <li>All significant decisions are evaluated and impact on the business plan is considered</li> <li>Business Plan has its own risk register which is annually reviewed along with the Business Plan.</li> <li>Keep abreast of policy developments and changes in Government.</li> <li>Any change in the law would affect all stock-owning councils and in this case we would have collective bargaining power.</li> </ul>	2.1 To review HRA business plan and ensure sufficient resources to meet plans.	Lisa Barker	Staff time	Aug 2019	<p>Impact</p> <p>Likelihood</p>
				2.2 To consider service charges and disaggregation from basic rent	Caroline Russell	Staff time	March 2020	
				2.3 Developing a marketing plan for Lifeline	James Baker	Staff time	Dec 2019	
				2.4 Consider bringing in additional income to support Housing Services: - Housing Company - Attract Government funding - Applying for charitable funding.			Ongoing Awaiting Resource	
				2.5 Reviewing the staffing structure to determine requirements	Lisa Barker	Staff Time	March 2020	

Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Action(s)	Officer	Resource	Due Date	Residual Risk Rating
3. Failure to: Respond to new legislation; Comply with new/existing legislation; take into account legal implications of decisions.	<ul style="list-style-type: none"> <li>Lack of adequate training or failure to comply with policies &amp; procedures</li> <li>Lack of appropriate performance management</li> <li>Low staff morale</li> <li>Inadequate supervision and management procedures</li> <li>Fraud &amp; corruption by staff, contractors or tenants (e.g. tampering with electric supply/meter)</li> <li>Staff shortages</li> </ul>	<ul style="list-style-type: none"> <li>Failure to deliver statutory and contractual obligations</li> <li>Deterioration in service delivery</li> <li>Increase in number of complaints/ negligence/liability/ claims resulting in financial cost and/or reputational damage to Council</li> <li>Poor service performance against SAP measures</li> <li>Deterioration in staff morale</li> <li>Not legally compliant</li> <li>Breach of Data Protection Act</li> </ul>	<ul style="list-style-type: none"> <li>Effective supervision and management controls in place including; one to ones, team meetings, appraisals, training, recruitment &amp; selection, capability</li> <li>Corporate audit programme in place and service specific management audits in place</li> <li>E Learning system in place and promotion of corporate policies, including; Anti-Fraud &amp; Corruption Strategy, Bribery Act, Internal Audit guidance notes, Whistleblowing Policy, Money Laundering Policy, Employee Code of Conduct</li> <li>Compliance with Code of Financial Practice &amp; authorisation limits supported by system based controls</li> <li>Separation of duties and declarations of interests</li> <li>Effective budgetary control</li> <li>Electronic devices have integrated security systems so that systems cannot be accessed if they are stolen</li> </ul>	3.1 Complete a review of all policies to ensure that they are up to date, relevant and compliant and put in place a programme for updating and reviewing on a regular basis.	Caroline Russell	Staff time	March 2020	<p>Impact</p> <p>Likelihood</p>
				3.2 Assess the need for specific procedures to back up policies and prepare these as necessary.	Caroline Russell	Staff time	March 2020	
				3.3 Monitor proposed and new legislation and case law and introduce/amend procedures as necessary.	Caroline Russell	Staff time	Ongoing	
				3.4 Sign up to legal update- is this toolkit??	Caroline Russell	Staff Time	September 2019	
				3.5 Ensure all work is recordable on management system/s and explore telephone call recording	Caroline Russell	Staff time	November 2019	
				3.6 To produce a toolkit on housing management procedures for income collection and sustaining tenancies service areas	Caroline Russell	Staff time	March 2020	

Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Action(s)	Officer	Resource	Due Date	Residual Risk Rating
4. Loss of IT	<ul style="list-style-type: none"> <li>Failure of WDC system or support, Power failure, System problems, including hacking/ cyber security threats &amp; cyber crime</li> <li>Major incident at Riverside House</li> </ul>	<ul style="list-style-type: none"> <li>Failure to meet statutory obligations</li> <li>Inability to provide services at normal levels which could include an effect upon home working</li> <li>Incorrect data on systems after a system failure</li> <li>Pressure on staff leading to deterioration in staff morale</li> <li>Legal action</li> <li>Reputational damage</li> </ul>	<ul style="list-style-type: none"> <li>The Service Area Crisis Plan has been updated to ensure sufficient plans are in place to maintain service in the event of significant loss of staff or systems</li> <li>Hard copy database of lifeline customers is maintained</li> <li>Financial System reconciliation</li> <li>Hard copy of Housing Management customers to be created</li> </ul>	4.1 Review Service Area Crisis Plan 6 monthly.	HMT	Staff time	July 2019	
				4.2 Review Business Continuity Plan.				
				4.3 Waiting List backup to be reviewed.	Elaine Wallace	Staff time	March 2020	
				4.4 Explore how Lifeline Services can maintain tenant and property lists in case of IT outage to ensure we can identify venerable tenants and leaseholder	James Baker	Staff time	Nov 2019	

Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Action(s)	Officer	Resource	Due Date	Residual Risk Rating
5. Accidents /health and safety of staff and contractors	<ul style="list-style-type: none"> <li>Lone working</li> <li>Potential violent customers</li> <li>Hazardous premises</li> <li>Bad weather</li> <li>Heavy workloads</li> <li>Tiredness</li> <li>Driving</li> <li>Inadequate / faulty equipment</li> </ul>	<ul style="list-style-type: none"> <li>Death or ill health</li> <li>Increase in sickness absence</li> <li>Loss of confidence</li> <li>Deterioration in staff morale</li> <li>Increase in compensation claims from staff</li> <li>Reputational damage</li> <li>Impact on service delivery</li> </ul>	<ul style="list-style-type: none"> <li>Operate Staff Alert List- corporate review of lone working</li> <li>Partnership links with MAPPA, Police and Social Services</li> <li>Issue of mobile phones to staff working out of the office</li> <li>Bespoke assessment of safe working practices where required</li> <li>Joint Consultative Group</li> <li>Accident/incident reporting and investigation</li> <li>DSE assessments</li> <li>WDC Health &amp; Safety Advisor has reviewed the operation of the Tunstall Lone Worker system on our recommendation &amp; reliability has improved as a result</li> <li>Corporate health &amp; safety policy&amp; risk assessments</li> <li>Adequate equipment inc. PPE</li> <li>COSSH, safe systems at work and permits to work compliance</li> <li>ICE list maintained</li> </ul>	5.1 All managers to carry out lone worker risk assessments for their lone worker roles – implement corporate review.	HMT	Staff time	Ongoing	
				5.2 Implement the Internal Audit findings on lone worker monitoring arrangements.  Staff Alert List – A back up ripple stone report schedule to capture data to be run monthly and stored at control.	Ian Carden; Sue Sweeney	Staff time	Ongoing  September 2019	
				5.3 Managers to check and take a copy of: - Driving Licence - Insurance - MOT	HMT	Staff time	Annual exercise	

Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Action(s)	Officer	Resource	Due Date	Residual Risk Rating
6. Failure of contractor to deliver effective service	<ul style="list-style-type: none"> <li>Lack of appropriate performance &amp; contract management</li> <li>Inadequate procurement</li> <li>Contractor dissatisfaction with client</li> </ul>	<ul style="list-style-type: none"> <li>Increase in number of complaints / compensation / negligence / liability claims</li> <li>Damage to buildings</li> <li>Failure to deliver statutory and contractual obligations</li> <li>Deterioration in service delivery</li> <li>Poor service performance against Service Area Plan measures</li> <li>Deterioration in staff morale</li> </ul>	<ul style="list-style-type: none"> <li>Effective procurement and contract management procedures in place including regular contractor meetings</li> <li>Regular meetings with procurement team</li> <li>Regular meetings with contractors</li> <li>Cleaning contract transfer to Kingdom is completed, novated and no bond in place</li> <li>To attend the HEART management board</li> </ul>	6.1 Monitor performance of Kingdom contract	HMT	Staff time	Ongoing	<p>Impact</p> <p>Likelihood</p>
				6.2 Implement the actions from the recent internal audit of Kingdom contract has been completed.	HMT	Staff time	Ongoing	
				6.3 Grounds maintenance contract to be reviewed and monitored - Removing rubbish - Grounds - Monitoring ongoing	HMT	Staff time	June 2020	
				6.4 to have regular contact with Assets	HMT	Staff Time	Ongoing	
				6.5 Review all contracts and insurance on a regular basis	HMT	Staff time	Ongoing	
				6.6 Attendance at quarterly HEART management board	HMT	Staff time	Quarterly	

Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Action(s)	Officer	Resource	Due Date	Residual Risk Rating
7. Risk of fire in blocks of flats	<ul style="list-style-type: none"> <li>Fire in a communal area of a block of flats or individual flat which spreads to other parts of the building</li> <li>General acts or omissions by anyone</li> <li>Accidental or deliberate ignition of a fuel</li> <li>Electrical fault</li> <li>Gas explosion</li> </ul>	<ul style="list-style-type: none"> <li>Loss of confidence and reputational damage</li> <li>Improvement notices</li> <li>Prohibition notices</li> <li>Fines, compensation and imprisonment</li> <li>Ill health and/or death</li> <li>Damage to property</li> <li>Effect on staff</li> <li>Need to rehouse occupiers</li> </ul>	<ul style="list-style-type: none"> <li>Compliant services testing programmes (gas, electric, biomass, fire detection and firefighting equipment)</li> <li>Fire risk assessment programmes</li> <li>Ensure that recommendations in FRAs are completed</li> <li>Procedure for the inspection and removal of stored items from communal areas</li> <li>Procedure for leaseholder fire doors</li> <li>Compliance Register in place</li> <li>Work with Warwickshire Fire and Rescue Service</li> <li>Completion of programme of inspection/visits to all high rise tenants/leaseholders</li> <li>Compliant service testing programs, checks carried out weekly and quarterly and any follow up works carried out in a timely manner</li> </ul>	7.1 Implement actions as a result of assessments fire risk assessments with Accessnet.	Caroline Russell	Staff time	Ongoing	
				7.2 Maintain daily inspection of communal areas in high rise.	Caroline Russell	Staff time	Ongoing	
				7.3 Complete all safety improvement work to 9 high rise blocks.	Caroline Russell	Staff time	March 2020	
				7.4 complete fire safety work programme for sheltered.	Caroline Russell	Staff time	March 2020	
				7.5 Start fire programme for low rise.	Caroline Russell	Staff time	March 2020	
				7.6 Complete/review fire safety in temporary accommodation.	Elaine Wallace	Staff time	March 2020	



Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Action(s)	Officer	Resource	Due Date	Residual Risk Rating
8. Deterioration of external areas – paths, greens, trees	<ul style="list-style-type: none"> <li>Failure to maintain areas</li> <li>Lack of awareness of ownership</li> <li>Vandalism</li> <li>Fly tipping</li> </ul>	<ul style="list-style-type: none"> <li>Injury to members of the public</li> <li>Damage to buildings including subsidence due to trees</li> <li>Damage to vehicles</li> <li>Complaints / legal action / Compensation claims</li> </ul>	<ul style="list-style-type: none"> <li>All staff who regularly visit estates to inspect for problems</li> <li>Ensure Tenancy Officer / Neighbourhood Officer visits include communal areas</li> </ul>	8.1 Review the role of the NHO team and integrate into their role.	Sue Sweeney	Staff time	March 2020	<p>Impact</p> <p>Likelihood</p>
				8.2 Implement action plan from tree audit inspection	Sue Sweeney	Environmental budget	March 2020	
				8.3 Audit of paths- undertaken by Assets	Sue Sweeney	Staff time	December 2020	
				8.4 High-rise environment audit / redesign – external works	Sue Sweeney	Staff time	March 2020	

Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Action(s)	Officer	Resource	Due Date	Residual Risk Rating														
9. Significant non-payment of rent leading to high rent arrears.	<ul style="list-style-type: none"> <li>Ongoing welfare reform (including Universal Credit)</li> <li>Ongoing economic uncertainty</li> <li>Housing related support budget cuts to floating support as a result of ongoing austerity measures.</li> <li>Tenants withholding rent</li> <li>additional risk for increase in rent not being collected due to there being 53 Mondays. For those tenants that claim UC this causes issue as the DWP will only account for a 52-week year when calculating the claimants monthly housing costs element.</li> </ul>	<ul style="list-style-type: none"> <li>Reduced rental income</li> <li>Reduced services</li> <li>Business plan revisions</li> <li>Negative publicity &amp; criticism from members</li> <li>Reputational damage</li> </ul>	<ul style="list-style-type: none"> <li>Clear and effective rent arrears recovery procedures</li> <li>Financial inclusion strategy</li> <li>Financial inclusion initiatives</li> <li>Additional staff resources</li> <li>Vulnerable groups identified and offered support</li> <li>Staff training</li> <li>Increase tenant awareness</li> <li>Closer working with other departments – especially Health and Community Protection</li> <li>Ensure money advice services in the district are fit for purpose</li> <li>Work in partnership with other Registered Providers to deliver local and national financially inclusive initiatives</li> <li>Financial risk assessments for new tenants</li> <li>Raise opportunities of financial inclusion initiatives within other council departments</li> <li>Work with partners to explore the benefits of collaborative working such as The Breathing Space</li> </ul>	9.1 Increase uptake of tenants paying by direct debit	Caroline Russell	Staff time	Ongoing	<table border="1"> <tr> <td rowspan="2">Impact</td> <td>High</td> <td>Medium</td> <td>Low</td> </tr> <tr> <td>High</td> <td>Medium</td> <td>Low</td> </tr> <tr> <td rowspan="2">Likelihood</td> <td>High</td> <td>Medium</td> <td>Low</td> </tr> <tr> <td>High</td> <td>Medium</td> <td>Low</td> </tr> </table>	Impact	High	Medium	Low	High	Medium	Low	Likelihood	High	Medium	Low	High	Medium	Low
				Impact	High	Medium	Low															
					High	Medium	Low															
				Likelihood	High	Medium	Low															
High	Medium	Low																				
9.2 Financial Inclusion Action Plan to be reviewed	Caroline Russell	Staff time	Sept 2019																			
9.3 To consider customer insight	Caroline Russell	Staff time	March 2020																			
9.4 To consider Moby soft Rent Sense	Caroline Russell	Staff time	March 2020																			

Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Action(s)	Officer	Resource	Due Date	Residual Risk Rating														
10. Failure to adequately manage residential leases	<ul style="list-style-type: none"> <li>Lack of staff awareness of leasehold rights and responsibilities</li> <li>Lack of leaseholder awareness of responsibilities</li> <li>Different lease agreements in place on different properties.</li> <li>Some leaseholders responsible for buildings insurance</li> </ul>	<ul style="list-style-type: none"> <li>Increased complaints potentially escalating to legal action.</li> <li>Inability to fully recover costs through service charges.</li> <li>Damage to adjoining council properties</li> </ul>	<ul style="list-style-type: none"> <li>Current management arrangements.</li> </ul>	10.1 Work with relevant tenants and leaseholders on block-specific issues.	HMT	Staff time	Ongoing	<table border="1"> <tr> <td rowspan="2" style="writing-mode: vertical-rl; transform: rotate(180deg);">Impact</td> <td style="background-color: yellow;"> </td> <td style="background-color: yellow;"> </td> <td style="background-color: red;"> </td> <td style="background-color: red;"> </td> </tr> <tr> <td style="background-color: green;"> </td> <td style="background-color: yellow;"> </td> <td style="background-color: yellow;"> </td> <td style="background-color: red;"> </td> </tr> <tr> <td colspan="5" style="text-align: center;">Likelihood</td> </tr> </table>	Impact									Likelihood				
Impact																						
Likelihood																						

Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Action(s)	Officer	Resource	Due Date	Residual Risk Rating
11. Increasing levels of homelessness	<ul style="list-style-type: none"> <li>Buoyant housing market pushing house prices out of reach of local people</li> <li>Recession causing increasing evictions</li> <li>Homeless Reduction Act</li> </ul>	<ul style="list-style-type: none"> <li>Increased workloads and pressure on staff</li> <li>Pressure on temporary accommodation leading to increased bed and breakfast use</li> <li>Pressure on budgets</li> <li>Reputational damage</li> <li>Complaints</li> <li>Increased rough sleeping</li> </ul>	<ul style="list-style-type: none"> <li>Current management and monitoring arrangements</li> <li>Exec approval for up to 5 units of leased accommodation</li> <li>Purchase of Beauchamp House</li> <li>Opening of twenty-two bedspace Direct Access Hostel at William Wallsgrove House</li> </ul>	<p>11.1 Review the homelessness strategy and develop an action plan</p> <p>11.2 To considered service provision with housing review</p>	<p>Elaine Wallace</p> <p>Lisa Barker</p>	<p>Staff time</p> <p>Staff time</p>	<p>March 2020</p> <p>March 2020</p>	<p>Impact</p> <p>Likelihood</p>

Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Action(s)	Officer	Resource	Due Date	Residual Risk Rating
12. Reputational risk due to Inability to meet the need for housing across the district	<ul style="list-style-type: none"> <li>Worsening housing crisis</li> <li>Lack &amp; cost of land availability</li> <li>Inadequate appraisal of full range of options</li> <li>Poor partnership arrangements with registered providers &amp; developers</li> <li>Ineffective S.106 procedure</li> <li>Poor housing market assessment data</li> <li>Not effectively using/spending commuted sums or other resources</li> </ul>	<ul style="list-style-type: none"> <li>Not meeting the housing need</li> <li>Increase in numbers on the waiting list</li> <li>Increase in homelessness &amp; demand for temporary accommodation</li> <li>Damage to RP partnerships</li> <li>Criticism from politicians &amp; the regulator</li> <li>Loss of opportunity to get government funding</li> <li>Instructed to house somebody by courts</li> </ul>	<ul style="list-style-type: none"> <li>The Housing &amp; Homelessness Strategy has an action plan to address the strategic objective</li> <li>Housing Revenue Account Business Plan directs available resources towards building new affordable homes</li> <li>The council is exploring the potential to develop a Council Economic Development and Housing Company and other strategic opportunities to increase the delivery of affordable homes</li> <li>Build partnerships with Housing Associations e.g. W2</li> <li>Strategic market assessment</li> <li>Affordable Housing Supplementary Planning Document in place to ensure developments deliver a suitable amount of affordable housing</li> <li>Committed sums policy in place and regular monitoring of funds</li> <li>Bring forward plan for building affordable homes</li> </ul>	12.1 Commission new housing market information	Vacant	Staff time Cost of £3000	March 2020	<p>Impact</p> <p>Likelihood</p>
				12.2 Consider the potential for a Housing Company	Lisa Barker	Staff time	March 2020	
				12.3 To deliver the framework for the delivery of affordable housing	Ken Bruno	Staff time	March 2020	