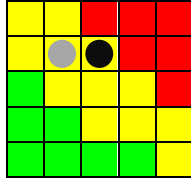
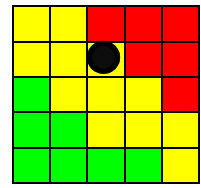


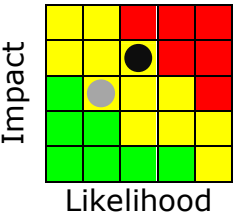
Housing Services Risk Register

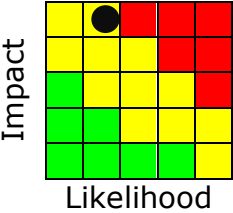
- Current assessment
- Previous assessment (where different)

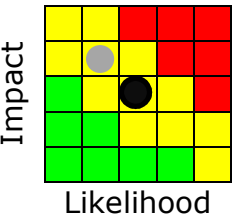
Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Officer	Action(s)	Resource	Due Date	Residual Risk Rating
1. Inadequate staffing resources	Inability to recruit/retain staff	Failure to meet statutory/regulatory obligations	Terms & conditions review	HMT	1.1 To identify posts where recruitment/retention issues and consider new job evaluation. Revaluation of lifeline completed. Monitoring homeless & HA officers. Housing management review required.	Staff Time	September 2018	<p>Impact</p> <p>Likelihood</p>
	Uncompetitive salaries, terms and conditions	Inability to provide services at normal levels	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		1.2 Investigate the opportunity for implementing further mobile working arrangements so that we have a more flexible workforce and working arrangements	Staff time	September 2018	
	Poor working environment	Pressure on remaining staff leading to deterioration in staff morale	Mobile (home) working practices in place		1.3 Ensure all appraisals and PDPs have been completed		Annual action	
	Poor management of staff	Complaints/Legal action/strike action	Potential to apply a market supplement		1.4 Ensure that home workers are adequately managed.	Staff time	Ongoing	
	Increasing sickness levels	Additional costs to employ temporary staff			1.5 Review Service Area Crisis Plan	Staff time	March 2018	
	Heavy workloads	Reputational damage			1.6 Comensura provided with details of agencies with housing staff		Complete	
	Low morale				1.7 Finalise the overall structure for the housing management team		April 2018	
	Inadequate training				1.8 Recruiting to posts affected by secondments to management team		September 2018	

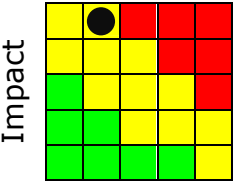
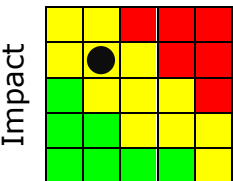
Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Officer	Action(s)	Resource	Due Date	Residual Risk Rating
1. Inadequate staffing resources					1.9 Finalising the Asset Management team structure 1.10 Recruiting to posts released by the Asset Management team structure.	Staff time	June 2018 December 2018	
2. Insufficient financial resources to sustain the services (HRA and General Fund)	<p>Unexpected cuts in sources of finance</p> <p>Major uninsured or uninsurable incident</p> <p>Poor budget management</p> <p>Increasing costs</p> <p>Significant variances in the assumptions that underpin the Business Plan</p> <p>High value void levy</p> <p>Mandatory rent reduction 2016 – 2020</p> <p>Changes to government regulations and legislation</p> <p>Rent more difficult to collect</p>	<p>Reduction in staffing levels</p> <p>Low morale among staff</p> <p>Inability to deliver services</p> <p>Increased complaints</p> <p>Reputational damage</p> <p>Reduction in Services</p> <p>Reduction in the delivery of new homes</p> <p>Inability to make capital repayments</p>	<p>Regular budget monitoring and early warning systems for any unexpected major expense or drop in income.</p> <p>Early contact with insurance Officer.</p> <p>Regular review of business plan performance which is reported to Finance and Audit Scrutiny Committee bi-annually</p> <p>Business Plan is updated annually and reported to Executive for approval</p> <p>All significant decisions are evaluated and impact on the business plan is considered</p> <p>Business Plan has its own risk register which is annually reviewed along with the Business Plan.</p> <p>Keep abreast of policy developments and changes in Government.</p> <p>Any change in the law would affect all stock-owning councils and in this case we would have collective bargaining power.</p>	HMT	<p>2.1 To review HRA business plan and ensure sufficient resources to meet plans</p> <p>2.2 To consider service charges and disaggregation from basic rent</p> <p>2.3 Developing a marketing plan for Lifeline</p> <p>2.4 Consider ways of bringing in additional income to support Housing Services:</p> <ul style="list-style-type: none"> - Housing Company - Attractive Government funding - Applying for charitable funding. <p>2.5 Reviewing the staffing structure to determine requirements</p>	<p>Staff time</p> <p>Staff time</p>	<p>March 2019</p> <p>March 2019</p> <p>June 2018</p> <p>June 2018</p> <p>September 2018</p>	<p>Impact</p>  <p>Likelihood</p>

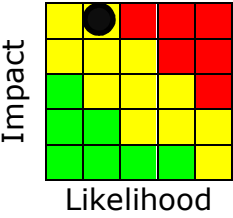
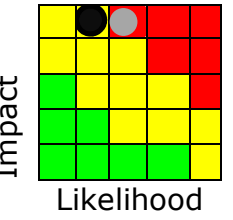
Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Officer	Action(s)	Resource	Due Date	Residual Risk Rating
<p>3. Failure to: Respond to new legislation; Comply with new/existing legislation; take into account legal implications of decisions.</p>	<p>Lack of adequate training or failure to comply with policies & procedures</p> <p>Lack of appropriate performance management</p> <p>Low staff morale</p> <p>Inadequate supervision and management procedures</p> <p>Fraud & corruption by staff, contractors or tenants (e.g. tampering with electric supply/meter)</p> <p>Staff shortages</p>	<p>Failure to deliver statutory and contractual obligations</p> <p>Deterioration in service delivery</p> <p>Increase in number of complaints/compensation/negligence/liability/claims resulting in financial cost and/or reputational damage to Council</p> <p>Poor service performance against PAP&SAP measures</p> <p>Deterioration in staff morale</p> <p>Not legally compliant</p> <p>Breach of Data Protection Act</p>	<p>Effective supervision and management controls in place including; one to ones, team meetings, appraisals, training, recruitment & selection, capability etc.</p> <p>Corporate audit programme in place and service specific management audits in place</p> <p>Elearning system in place and promotion of corporate policies, including; Anti-Fraud & Corruption Strategy, Bribery Act, Internal Audit guidance notes, Whistleblowing Policy, Money Laundering Policy, Employee Code of Conduct</p> <p>Compliance with Code of Financial Practice & authorisation limits supported by system based controls</p> <p>Separation of duties and declarations of interests</p> <p>Effective budgetary control</p> <p>Electronic devices have integrated security systems so that systems cannot be accessed if they are stolen</p>	<p>HMT</p>	<p>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.</p> <p>3.2 Assess the need for specific procedures to back up policies and prepare these as necessary.</p> <p>3.3 Monitor proposed and new legislation and case law and introduce/amend procedures as necessary.</p> <p>3.4 Legal to be asked to advise officers of legislative change</p>	<p>Staff time</p> <p>Staff time</p> <p>Staff time</p>	<p>March 2019</p> <p>To follow the above.</p> <p>Ongoing</p> <p>June 2018</p>	<p>Impact</p>  <p>Likelihood</p>

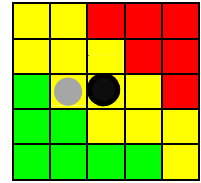
Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Officer	Action(s)	Resource	Due Date	Residual Risk Rating
4. Loss of IT	<p>Failure of WDC system or support, Power failure, System problems, including hacking/ cyber security threats & cyber crime</p> <p>Major incident at Riverside House</p>	<p>Failure to meet statutory obligations</p> <p>Inability to provide services at normal levels which could include an effect upon home working</p> <p>Pressure on staff leading to deterioration in staff morale</p> <p>Legal action</p> <p>Reputational damage</p>	<p>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</p> <p>Hard copy database of lifeline customers is maintained</p> <p>Hard copy of Housing Management customers to be created</p>	HMT	<p>4.1 Update Service Area Crisis Plan</p> <p>4.2 Hard copy of Housing Management customers to be created</p>	<p>Staff Time</p> <p>Staff Time</p>	<p>March 2018</p> <p>Monthly</p>	 <p>Impact</p> <p>Likelihood</p>

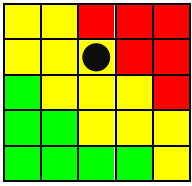
Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Officer	Action(s)	Resource	Due Date	Residual Risk Rating
5. Accidents /health and safety of staff and contractors	Lone working Potential violent customers Hazardous premises Bad weather Heavy workloads Tiredness Driving Inadequate/faulty equipment	Death or ill health Increase in sickness absence Loss of confidence Deterioration in staff morale Increase in compensation claims from staff Reputational damage Impact on service delivery	Operate Staff Alert List Partnership links with MAPPA, Police and Social Services Issue of mobile phones to staff working out of the office Bespoke assessment of safe working practices where required Joint Consultative Group (management and unions) Accident/incident reporting and investigation DSE assessments WDC Health & Safety Advisor has reviewed the operation of the Tunstall Lone Worker system on our recommendation & reliability has improved as a result Corporate health & safety policy& risk assessments Adequate equipment including PPE COSSH, safe systems at work and permits to work compliance ICE list maintained	HMT	5.1 All managers to carry out lone worker risk assessments for their lone worker roles 5.2 Implement the Internal Audit findings on lone worker monitoring arrangements. 5.3 Ice list to be reviewed / updated 5.4 Managers to check and take a copy of - Driving Licence - Insurance / MOT	Staff Time Staff Time Staff Time Staff Time & IT	December 2017 31 st March 2018 Quarterly Annually	 <p>Impact</p> <p>Likelihood</p>

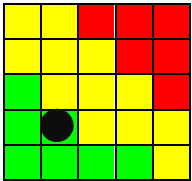
Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Officer	Action(s)	Resource	Due Date	Residual Risk Rating
6. Failure of contractor to deliver effective service	Lack of appropriate performance & contract management Inadequate procurement Contractor dissatisfaction with client	Increase in number of complaints/compensation/negligence/liability/claims Damage to buildings Failure to deliver statutory and contractual obligations Deterioration in service delivery Poor service performance against Service Area Plan measures Deterioration in staff morale	Effective procurement and contract management procedures in place including regular contractor meetings Regular meetings with procurement team Regular meetings with contractors Cleaning contract transfer to Kingdom is completed, novated and bond in place	HMT	6.1 Monitor performance of Kingdom contract 6.2 Implement the actions from the recent internal audit of Kingdom contract 6.3 Grounds maintenance contract to be reviewed and monitored - Removing rubbish - Grounds 6.4 Develop protocol with Asset Management 6.5 Review all contracts on a regular basis	Staff time Staff time	Ongoing September 2018 Ongoing Quarterly / Monthly	 <p>Impact</p> <p>Likelihood</p>

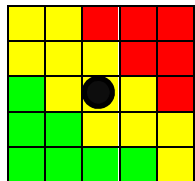
Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Officer	Action(s)	Resource	Due Date	Residual Risk Rating
7. Risk of fire in blocks of flats	Fire in a communal area of a block of flats or individual flat which spreads to other parts of the building General acts or omissions by anyone Accidental or deliberate ignition of a fuel Electrical fault Gas explosion	Loss of confidence and reputational damage Improvement notices Prohibition notices Fines, compensation and imprisonment Ill health and/or death Damage to property Effect on staff Need to rehouse occupiers	Compliant services testing programmes (gas, electric, biomass, fire detection and firefighting equipment) Fire risk assessment programmes Ensure that recommendations in FRAs are completed Procedure for the inspection and removal of stored items from communal areas Procedure for leaseholder fire doors Compliance Register in place Work with Warwickshire Fire and Rescue Service Completion of programme of inspection/visits to all high rise tenants/leaseholders	Simon Brooke	7.1 Update fire risk assessments, implement actions as a result of assessments and high rise project 7.2 Maintain daily inspection of communal areas in high rise 7.3 Agree a programme of renewal for all FRA	Staff time Staff time	November 2018 Ongoing September 2018	
8. Deterioration of external areas – paths, greens, trees	Failure to maintain Lack of awareness of ownership Vandalism Fly tipping	Injury to members of the public Damage to buildings including subsidence due to trees Damage to vehicles Complaints/legal action/Compensation claims	All staff who regularly visit estates to inspect for problems Ensure Tenancy Officer/Neighbourhood Officer visits include communal areas	Sue Sweeney	8.1 Review the role of the NHO team and integrate into their role.	Staff time	September 2018	

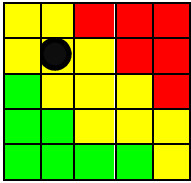
Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Officer	Action(s)	Resource	Due Date	Residual Risk Rating
9. Unable to respond to emergency calls from Lifeline users	IT system failure Communications failure Power failure Loss of Control Centre Corporate recruitment and retention policies adversely affecting 24 hour services Corporate standby policy	Death or ill health Reputational damage Litigation	Business continuity arrangements with Tunstall Corporate SLA with ICT Business resilience reviews in respect of lifeline Continuously review call performance against targets Business continuity plan	James Baker	9.1 Review changes made in 2017 9.2 Review service standards in place			
10. Failure of fire alarm system at sheltered schemes	Systems that are out of date and not repairable	Injury or death Damage to property Lack of confidence and reputation	Compliant service testing programs, checks carried out weekly and quarterly and any follow up works carried out in a timely manner Where there is a technical problem with the system, then it is either repaired urgently, and /or temporary battery alarms are installed If the sensor does send a call to the Lifeline Monitoring Centre, and no staff are at the scheme, then two response officers will be sent to the scheme, and the appropriate emergency services will be summoned Ensure sufficient Lifeline staff on duty to cover such eventualities: staff to be employed to cover standby rota Clear procedures and staff training	James Baker				

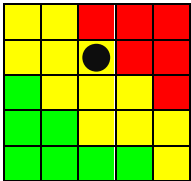
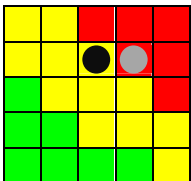
Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Officer	Action(s)	Resource	Due Date	Residual Risk Rating
11. Significant non-payment of rent leading to high rent arrears	<p>Ongoing welfare reform (including Universal Credit)</p> <p>Ongoing economic uncertainty</p> <p>Supporting People budget cuts to floating support as a result of ongoing austerity measures.</p> <p>Pay-to-Stay</p> <p>LHA Caps for social housing</p> <p>Tenants withholding rent</p>	<p>Reduced rental income</p> <p>Increase in homelessness</p> <p>Reduced services</p> <p>Business plan revisions</p> <p>Negative publicity & criticism from members</p> <p>Reputational damage</p>	<p>Clear and effective rent arrears recovery procedures</p> <p>Financial inclusion strategy</p> <p>Financial inclusion initiatives</p> <p>Additional staff resources</p> <p>Vulnerable groups identified and offered support</p> <p>Staff training</p> <p>Increase tenant awareness</p> <p>Closer working with other departments – especially Health and Community Protection</p> <p>Ensure money advice services in the district are fit for purpose</p> <p>Work in partnership with other Registered Providers to deliver local and national financially inclusive initiatives</p> <p>Financial risk assessments for new tenants</p> <p>Raise opportunities of financial inclusion initiatives within other council departments</p> <p>Work with partners to explore the benefits of collaborative working such as The Breathing Space</p>	John Gallagher	<p>11.1 Increase uptake of tenants paying by direct debit</p> <p>11.2 Financial Inclusion Action Plan in place</p> <p>11.3 Arrears action plan to be updated re roll-out of Universal Credit</p>	<p>Staff time</p> <p>Staff time</p> <p>Staff time</p>	Ongoing	<p>Residual Risk Rating</p>  <p>Impact</p> <p>Likelihood</p>

Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Officer	Action(s)	Resource	Due Date	Residual Risk Rating
<p>12. Inadequate management of accommodating dangerous customers in the community-subject to Multi Agency Public Protection Arrangement (MAPPA) level 2 & 3 or Integrated offender management</p>	<p>Lack of adequate policies and procedures</p> <p>Inexperienced staff or staff not knowing triggers & procedures</p> <p>Lack of partnership working and information sharing</p> <p>WDC not being aware that a customer is subject to MAPPA level 2 or PPO level 3</p> <p>WDC Staff not regularly attending MAPPA & PPO meetings</p>	<p>Risk of harm to members of the public and WDC employees</p> <p>Potential impact on community cohesion</p> <p>Negative press coverage</p> <p>Failure to safeguard vulnerable adults</p> <p>Reputational damage</p> <p>Litigation</p> <p>Ineffective partnership working</p>	<p>County-wide protocol for safeguarding vulnerable adults. (Currently working jointly with other housing districts, boroughs and WCC)</p> <p>Involvement with other agencies to manage risk & regular attendance at MAPPA & PPO Meetings</p> <p>MAPPA & PPO flags on ActiveH</p> <p>Staff Alert List database</p> <p>Training on safeguarding adults</p>	<p>HMT</p>	<p>12.1 To develop an internal procedure for accepting and allocating MAPPA and PPO customers, including a risk management plan template</p> <p>12.2 Develop an information sharing protocol for all interested parties</p>	<p>Staff Time</p> <p>Staff Time</p>	<p>December 2018</p> <p>December 2018</p>	<p>Impact</p>  <p>Likelihood</p>

Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Officer	Action(s)	Resource	Due Date	Residual Risk Rating
13. Failure to understand and react to customer/client contributions	<p>Lack of staff support from the service to facilitate involvement</p> <p>Not delivering the expectations of our customers</p> <p>Lack of interest by residents</p>	<p>Failure to meet tenant & leaseholder expectations</p> <p>Failure to meet the HCA Regulatory Standard for Tenant Involvement & Empowerment</p> <p>Negative press coverage</p> <p>Increase in corporate complaints</p> <p>Reduction in satisfaction levels</p> <p>Reputational damage</p>	<p>Housing Advisory Group has three tenants/leasehold representatives.</p> <p>The performance management framework is focussed on customer experience and includes a number of measures of customer satisfaction</p> <p>The publication of localised newsletters which are targeted to specific locations and/or customer base</p> <p>The Service Improvement Team is in place to support the service in developing its tenant contribution structures</p> <p>Programme of Estates Walkabouts are in place which enable residents to directly improve the area in which they live in</p>	<p>HMT</p> <p>SIP</p>	<p>13.1 Review of customer engagement</p> <p>13.2 HMT to consider the outcomes of the STAR survey</p> <p>13.3 Consider customer service training / set out our expectations.</p>	<p>Staff time</p> <p>Staff time</p>	<p>September 2018</p> <p>June 2018</p> <p>March 2019</p>	<p>Impact</p>  <p>Likelihood</p>

Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Officer	Action(s)	Resource	Due Date	Residual Risk Rating
14. Inability to meet the need for housing across the district	<p>Worsening housing crisis</p> <p>Lack & cost of land availability</p> <p>Failure to identify land available for new build</p> <p>Inadequate appraisal of full range of options</p> <p>Legislation changes e.g. Welfare Reform</p> <p>Poor partnership arrangements with registered providers & developers</p> <p>Ineffective S.106 procedure</p> <p>Poor housing market assessment data</p> <p>Inadequate information/ records</p> <p>Not effectively using/spending commuted sums or other resources</p>	<p>Not meeting the housing need</p> <p>Increase in numbers on the waiting list</p> <p>Increase in homelessness & demand for temporary accommodation</p> <p>Reputational damage</p> <p>Damage to RP partnerships</p> <p>Criticism from politicians & the regulator</p> <p>Loss of opportunity to get government funding</p> <p>Policy failure</p>	<p>The Housing & Homelessness Strategy has an action plan to address the strategic objective</p> <p>Housing Revenue Account Business Plan directs available resources towards building new affordable homes</p> <p>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</p> <p>Build partnerships with Housing Associations e.g. W2</p> <p>Strategic market assessment</p> <p>Affordable Housing Supplementary Planning Document in place to ensure developments deliver a suitable amount of affordable housing</p> <p>Committed sums policy in place and regular monitoring of funds</p>	<p>Charlotte Rowan-Lancaster</p> <p>LB</p>	<p>14.1 Commission new housing market information</p> <p>14.2 CMT to consider the potential for a housing company</p> <p>14.3 CMT to consider a framework for the delivery of affordable housing</p>	<p>Staff time Cost approx. £3,000</p> <p>Staff time</p>	<p>April 2018</p> <p>June 2018</p> <p>June 2018</p>	<p>Impact</p>  <p>Likelihood</p>

Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Officer	Action(s)	Resource	Due Date	Residual Risk Rating
<p>15. Failure to meet statutory licensing scheme for homes in multiple occupation (HMO) particularly following the extension of HMO licensing from 1 October 2018.</p>	<p>Inadequate staffing</p> <p>Inadequate systems</p> <p>Not being proactive in visiting and assessing properties</p> <p>Attitude of landlords</p>	<p>Failure to meet statutory requirements</p> <p>Reputational damage</p> <p>Legal challenge</p> <p>Complaints</p>	<p>Programme of relicensing inspections in place</p> <p>Regular performance reporting</p> <p>Maintain adequate staffing levels: Two fixed-term contracts within the team that were due to end have been extended until 31 March 2019 to help with the extension of HMO licensing</p> <p>Continue to publicise & highlight what the Council does to encourage decent management of HMOs</p> <p>HMO Licencing programme kept under review.</p>	<p>Mark Lingard</p>	<p>15.1 Promote awareness amongst landlords of the forthcoming extension of HMO licensing and encourage license applications in advance of 1 October 2018 to help speed up the licensing process.</p>	<p>Staff Time</p>		<p>Impact</p>  <p>Likelihood</p>

Risk Description	Possible Triggers	Possible Consequences	Risk Mitigation/Control	Officer	Action(s)	Resource	Due Date	Residual Risk Rating
16. Failure to adequately manage residential leases	<p>Lack of staff awareness of leasehold rights and responsibilities.</p> <p>Lack of leaseholder awareness of responsibilities</p> <p>Different lease agreements in place on different properties.</p> <p>Some leaseholders responsible for buildings insurance</p>	<p>Increased complaints potentially escalating to legal action.</p> <p>Inability to fully recover costs through service charges.</p> <p>Damage to adjoining council properties</p>	Current management arrangements.	HMT	<p>16.1 Issue a new Leaseholder Handbook.</p> <p>16.2 Review procedures and training needs.</p> <p>16.3 Work with relevant tenants and leaseholders on block-specific issues.</p> <p>16.4 Develop the leaseholder pages of the website based on leaseholder suggestions.</p>	<p>Existing budgets</p> <p>Staff time</p> <p>Staff time</p> <p>Staff time</p>	<p>March 2018</p> <p>March 2018</p> <p>Ongoing</p> <p>March 2018</p>	<p>Impact</p>  <p>Likelihood</p>
17. Increasing levels of homelessness	<p>Buoyant housing market pushing house prices out of reach of local people</p> <p>Recession causing increasing evictions</p> <p>Homeless Reduction Act</p>	<p>Increased workloads and pressure on staff</p> <p>Pressure on temporary accommodation leading to increased bed and breakfast use</p> <p>Pressure on budgets</p> <p>Reputational damage</p> <p>Complaints</p> <p>Increased rough sleeping</p>	<p>Current management and monitoring arrangements</p> <p>Exec approval for up to 5 units of leased accommodation</p> <p>Purchase of Beauchamp House</p> <p>Funding for Packington Place</p>	Elaine Wallace	<p>17.1 Manage the impact of the Homeless Reduction Act.</p> <p>17.2 Review the homelessness strategy and develop an action plan</p>	Staff time	<p>March 2018</p> <p>June 2018</p>	<p>Impact</p>  <p>Likelihood</p>