

Ref number	Risk name	Risk description	Lead risk owner	Cause/s	Potential impact/consequences	Existing control measures in place	Current risk likelihood	Current risk impact	Current risk score	Treatment (4Ts)	Planned action / future mitigation	Target risk likelihood	Target risk impact	Target risk score
SHDCHRA01	Business continuity	Risk around business continuity and recovery in the event of a major incident or event	AD: Regulatory	The Council has a central role to play in the response to a major incident or event in the community and the subsequent recovery phase. The risk of flooding, both coastal and inland is increasingly recognised as one of the most significant and 'likely' events that the Council will need to help with recovery. There are also internal incident and events which could impact on the Council's operations directly (e.g. cyber-attack, IT infrastructure failure, building fire).	In the immediate response phase to an emergency in the District, the "Blue Light" services will take the lead with the Council taking the lead role in the subsequent recovery phase. There could be significant impact on service delivery and potentially Council finances.	The establishment of the S&ELCP has increased the resilience and capability of the 3 partner councils. Resources can be more easily shared across the sub-regions and procedures and policies are being joined up to make our response to and recovery from an incident more efficient and effective. A strategic group meets regularly, including representation from PSPS, with minutes and actions reported to LT Governance for awareness. Staff across the S&ELCP are regularly trained at both Silver and Gold command in order to take a full part in a Lincolnshire-wide emergency response and support our partners in the sub region. All three councils are members of the Lincolnshire Resilience Forum, enabling access to expertise held by LCC whilst retaining staff, resources and expertise in each sovereign council within an EP&BC structure across the Partnership. Senior staff within the Councils are involved in training exercises delivered by the LRF. Regular 'live' training exercises are coordinated at County level to maximise preparedness in each council and across the sub region. Each authority has an Emergency Plan & Business Continuity Plan in place in order that service delivery can be prioritised and maintained at such times. A joint emergency and business continuity plan was approved in 2021 for ELDC and BBC to improve resilience and capability with plans for a more joined up approach across the sub region with the advent of the S&ELCP. Public Sector Partnership Services (PSPS) and Magna Vitae have Business Continuity Plans in place.	3	3	Medium (9)	Tolerate	Continued partnership working with the Lincolnshire Resilience Forum (LRF)	3	3	Medium (9)
SHDCHRA02	Health and Safety	Risk of failure to comply with Health and Safety requirements	AD: Regulatory	The Council has a clear responsibility to both staff and recipients of services under Health and Safety legislation and needs to effectively manage its responsibilities.	There can be consequences to the organisation's finances and reputation relating to non-compliance of health and safety requirements. There is also the risk of harm to individuals.	The establishment of the S&ELCP has increased the resilience and capability of the 3 partner councils. Resources can be more easily shared across the sub-region and procedures and policies are being joined up to provide a more efficient and effective approach towards H&S compliance. The partner Councils receive specialist Health and Safety advice from Public Sector Partnership Services who support the Partnership Health and Safety Governance Group (chaired by the Assistant Director – Regulatory) and the Staff Health and Safety Forum. Both operate under agreed terms of reference and feed into the LT – Governance. LT Governance receive minutes and recommendations for approval from the Governance Group and the staff Forum. Policies and procedures are agreed at the Governance Group and referred to LT Governance for information. Health and Safety is included within Internal Audit's annual audit plan. The audit undertaken in 2021 demonstrated a substantial level of assurance.	2	3	Medium (6)	Tolerate	Continued monitoring and reporting	2	3	Medium (6)
SHDCHRA03	Risk oversight	Risk oversight reduced as part of the South and East Lincolnshire Councils partnership. Overseeing the risks including a regular review of the profile and acceptance of the mitigations of the service may be reduced due to a shared SLT	AD: Housing	Shared SLT	Risk not monitored appropriately as expected by the Regulator	Work with PFH and Section 151 taking place to mitigate. Transformation programme established to fully review landlord operations, oversee by a Transformation Board made up of representatives from across the partnership. The Board is chaired by the PFH for Strategic and Operational Housing and sponsored by Director for Communities. Near misses from a health and safety and compliance with the consumer standards perspective reported to Deputy Chief Exec. HRA Governance Arrangements adopted by Cabinet.	2	3	Medium (9)	Tolerate	Continued monitoring and reporting	2	3	Medium (9)
SHDCHRA04	Management of health and safety	Insufficient arrangements in place to monitor and manage compliance.	AD: Housing	Compliance function does not have arrangements in place for effective planning, organisation, control, monitoring and review of measures to protect people	Death or injury to staff, tenants or contractors; reputation; litigation and charges of corporate manslaughter	Service specific H&S procedures. Training for staff in key areas; standing items on team meeting agendas. Programme in place for gas, electric, asbestos, legionella, and fire safety. Decent Homes programme in place. Programme for stock condition surveys. Dedicated resource in place to manage compliance from Jan 24. Random audit checks to delivered. Housing Repairs and Compliance Manager formally appointed as Health & Safety Lead for the HRA. Summers Immen appointed as Principal Designer. Monthly updates provided to RSH	2	4	(Medium) 8	Tolerate	Continued monitoring and reporting	2	4	(Medium) 8
SHDCHRA05	Management of health and safety of DLO	Inadequate arrangements in place to meet the HSE requirements as a DLO employer	AD: Housing	Service does not have arrangements in place for effective planning, organisation, control, monitoring and review of measures to protect people	Death or injury to staff, tenants or contractors; reputation; litigation and charges of corporate manslaughter	Service specific H&S procedures; Qualified and certified employees; adequate insurance; programme for insuring training remains valid; self-audits. Programmed inspections of equipment and daily use inspections carried out by operators, which highlight any equipment deficiencies or damage, supply chain in place to replace equipment as necessary, larger items are hired to avoid replacement and service costs RA's, COSHH and SSOW in place and updated in line with H&S best practice, digital copies held in office and hard copies held by each tradesman. Regular training and tool box talks held in reference to H&S issues, compliance and the use of equipment.	1	5	Medium (5)	Tolerate	Continued monitoring and reporting	1	5	Medium (5)

SHDCHRA06	Data	Inaccurate or incomplete data	AD: Housing	Data integrity issues; staff competency issues	Can lead to erroneous conclusions and subsequently misguided decisions.	NEC Training for officers provided, IT skills audit. Data validation for TSM perception surveys carried out by external consultant and methodology explained. Sewerage Treatment Works stock condition data verified externally. Statutory testing such as gas and electricity goes through quality assurance process before data is agreed. Annual training programme of all staff reviewed to ensure understand obligations. Management checks on data. Updates to HLB. Data Strategy and KPI suite established setting out data collection and reporting process. Stock condition programme in place to ensure data on components surveyed and updated into NEC on a regular basis (minimum 5 yearly)	1	3	low (3)	Tolerate	Continued monitoring and reporting	1	3	low(3)
SHDCHRA07	Listening to tenants	Failure to listen and respond to the tenant voice	AD: Housing	Lack of training and awareness on the requirements and benefits to listen to tenants; culture that does not appreciate tenants; Not delivering/listening to the expectations of the tenants; Not learning from complaints; appreciation that it may take time to build relationships with tenants.	Failure to meet the consumer regulations; Failure to meet tenant expectations; No tenant engagement board; Increase in complaints; Reputational damage; Complaint Handling Failure Order (from Housing Ombudsman)	The Housing Transformation Programme action plans includes tenant engagement and involvement as a key priority. Member and officer briefings around Consumer Standards and risk of not meeting these. Transformation Programme established and tenant voice theme in Mandate and Strategy, adopted by Members. Member and staff training, work with HRA to review the manner and culture towards tenants. Tenant engagement Lead Officer appointed and Tenant Engagement Strategy adopted by Cabinet. Tenant Forum launched. 26/27 budget includes two additional engagement posts. Constitution updated to recognise Tenant Panel. Tenants form Aids and Adaptations Panel.	2	2	Low (4)	Tolerate	Recruit to tenant panel - Feb 26	2	2	Low (4)
SHDCHRA08	Tenant engagement resource	Lack of appropriate resources in place to facilitate tenant engagement	AD: Housing	Lack of budget for tenant engagement including resource, no designated lead for engagement; lack of planning for engagement; tenants stop engaging; unable to assist tenants that wish to implement tenant-led activities to influence and scrutinise the service	Failure to meet the consumer regulations; Failure to meet tenant expectations; No tenant engagement board; Increase in complaints; Reputational damage	The Housing Transformation Programme action plans includes tenant engagement and involvement as a key priority. Member and officer briefings around Consumer Standards and risk of not meeting these. Transformation Programme established and tenant voice theme in Mandate and Strategy, adopted by Members. Tenant Engagement Lead on establishment as a permanent role. 26/27 budget includes two additional engagement posts. Constitution updated to recognise Tenant Panel.	3	3	Medium (9)	Treat	Council to adopt additional posts in Feb 26	2	3	Medium (6)
SHDCHRA09	Qualification requirements	Management Team not qualified to the prescribed standards of the Regulator	AD: Housing	Lack of budget to fund training, availability of time invest in training, new requirement with detail still to be revealed. Reluctance to complete qualifications	Failure to meet the consumer standards; reputational damage; impact on the service as time focused studying; impact on retention of managers	AD-Housing, Repairs and Compliance Manager, Head of Housing Investment and Director Communities all have qualifications.	2	2	Low (4)	Treat	Housing Services Manager and Tenant Engagement Lead to enroll for studies during 2026. (Deadline is 2029)	2	2	Low (4)
SHDCHRA10	HRA business plan	HRA not having an agreed strategy on how to implement all of the matters identified for improvement, growth, BAU and transformation	AD: Housing	Lack of HRA business plan narrative - Significant and unknown variances in the assumptions that underpin the HRA Business Plan	Change in areas of focused expenditure	Monthly budget meetings and forecasts reviewed. Designated Finance Business Partner. Regular reporting in place with s151 and Members. Stock condition surveys programme. Savills awarded contract to draft business plan and work well underway with latest stock data and budget being used as part of modelling. Programme of works approved by s151. Due for adoption as part of budget setting for 26/27	2	3	Medium (9)	Treat	Business plan and Asset Management Strategy to be adopted 28/1/26	1	1	Low(1)
SHDCHRA11	Failure to meet Regulatory Consumer Standards	Failure to adapt the service to meet the new regulatory standards	AD: Housing	Lack of tenant engagement options; lack of governance arrangements; decisions not informed by data; poor record keeping; poor complaint handling; Lack of staff support; lack of Member and Senior Leadership oversight and/or understanding; service not resourced enough to deliver requirements; unplanned inspection	Fail inspection by the regulator; reputational damage; financial penalties	Housing Transformation Programme established, Member and officer briefings, performance data published to Portfolio Holder on a monthly basis. Action plan logging requirements and transformation board established to track progress. Senior Leaders briefed on changes and risk. Continued service improvement is being tracked by the Housing Transformation Board which will support a decreasing risk level. C2 grading issued by RSH July 25, monthly meetings held, working towards C1	2	2	Low (4).	Tolerate	Working towards C1, anticipated summer 2026	2	2	Low (4).
SHDCHRA12	Failure to self-refer to the regulator	Failure to self-refer to the regulator when a breach has been identified	AD: Housing	A breach in the consumer standards being identified or raised	Contacted by ministers; reputational damage; financial penalties	Housing Transformation Programme covers actions to reduce the greatest risks, PFH regularly updated, members on board, Transformation Board to monitor progress. HRA HLB ToR agreed and updated to include referrals to the responsible person for reporting regulatory breaches. Updated procedure in place to deal with reporting issues to the RSH. Self referrals discussed on a six weekly basis by Housing Landlord Board.	1	3	Low(3)	Tolerate		1	3	Low(3)

SHDCHRA13	Impact of Awaab's law	Unable to deliver strict operating procedures set within legislation.	AD-Housing	Lack of appropriate resources in place to deliver operating procedures proposed. Service not designed around delivering these expectations.	Failure to deliver the new legislation of which may link an increase in successful legal challenge as part of disrepair claims. Potential for non-compliance with consumer standards. Reputational damage.	Phase 1 met - additional resources recruited to, policy updated and transformation project complete. Phase 2 and 3 details unknown - yet to be published by MHCLG.	3	2	Medium (6)	Tolerate	Ongoing review of phases as MHCLG announces detail	2	2	Medium (6)
SHDCRA14	Minimum Energy Efficiency Standards	Unable to meet Minimum Energy Efficiency Standards set within MHCLG consultation/MHCLG target for fuel poverty				Does not have a programme in place to deliver all homes to EPC C by 2030. Warm Homes programme in place until 2028, however 1,000 units remain outside of these programme. Currently a government target (but not legal requirement) to have all social housing at grade C by 2030. MHCLG MEES consultation during Sep 2025 (MHCLG) consults on this becoming a formal requirement and will form part of Decent Homes Standard of which social landlords will be required to meet and will impact regulatory gradings. Business Plan models finances to fund programme to complete all homes by 2030, programme and contract yet to be awarded.	3	3	Medium (9)	Treat	Apply for all available government funding and monitor MHCLG announcements - ongoing	2	2	Medium (6)
SHDCHRA15	HRA business plan2 NEW	Failure to maintain the golden thread between the understanding of stock condition and investment need and what can be financed within the HRA Business Plan.	AD: Housing	Lack of HRA business plan narrative - Significant and unknown variances in the assumptions that underpin the HRA Business Plan	Change in areas of focused expenditure	Monthly budget meetings and forecasts reviewed. Designated Finance Business Partner. Regular reporting in place with S151 and Members. Stock condition surveys programme, data used to model Capital Programme accurately. Savills drafted business plan and will continue to provide support with annual refresh and modelling. Due for adoption as part of budget setting for 26/27.	3	3	Medium (9)	Treat	Business plan and Asset Management Strategy to be adopted 28/1/26. Approach to reviewing model to be established during 26/27	1	3	Low(1)
SHDCRA16	Emergency repairs service (staffing)	Insufficient numbers of repairs operatives on the out-of-hours emergency repairs rota result in emergency repairs not attended within set timescales outside of working hours. Resulting in a breach of Awaabs law. Unable to deliver critical service to tenants.	AD: Housing	Reduction in volunteers willing to be on call (not part of terms and conditions)	Breach of Awaabs law, damage to property due to non-attendance within call-out window, increase in complaints, breach of Safety and Quality standard resulting in non-compliance with RSH standards. Financial penalties, legal action, reputational damage.	Voluntary arrangements with repairs operatives covering the service. SERCO triaging repairs calls. Emergency heating and sewage calls outsourced to contractors. 5 operatives currently on the rota, with 2 required at all times.	3	4	High 12	treat	Attempt to recruit additional volunteers by 25 January (meeting scheduled for w/c 12 Jan). Review standby pay rates for operatives 31/1/26). Contracts for new repairs operatives to be amended to make this a mandatory term of contract (tbc - no vacancies at present). Explore options of outsourcing this arrangement by 28/2/26. If necessary, explore changes to terms and conditions of current repairs operative contracts.	1	1	