



**GARRION PEOPLE'S HOUSING CO-OPERATIVE LTD (CHARITY)
& FORGEWOOD HOUSING CO-OPERATIVE LTD (CHARITY)**

RISK MANAGEMENT POLICY

**AS WITH ALL OF THE CO-OPERATIVE'S POLICIES, THIS GUIDE, IN FULL AND IN PART,
IS AVAILABLE IN SUMMARY, ON TAPE, IN BRAILLE,
AND IN TRANSLATION INTO MOST OTHER LANGUAGES –**

**PLEASE ASK A MEMBER OF STAFF IF YOU WOULD LIKE
A VERSION IN A DIFFERENT FORMAT**

POLICY IMPLEMENTATION CHECKLIST	
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1. INTRODUCTION

The Co-operative has a moral and statutory duty of care to its tenants, customers, employees and assets. We will meet this duty by ensuring that risk management plays an integral part in the management of the Co-operative at a strategic and operational level.

The purpose of this policy is to ensure that appropriate policies and procedures are in place to minimise risks faced by the Co-operative. Potential risks are inherent in all aspects of the Co-operative and are identified under the appropriate sections of this policy

The Co-operative will apply a risk management cycle to identify, analyse, control and monitor the strategic and operational risks it faces. This policy document sets out how this will be done. The Co-operative's senior staff and internal auditors will be responsible for ensuring that the cycle is applied and for checking actions are implemented.

We aim to treat risk management as an integral part of our work and will report on any significant risks in reports to Committee and in any policies we adopt. We will also examine risk when undertaking any new areas of work or expanding our current activities.

2. OTHER RELEVANT POLICIES & PRACTICES

Key policies and practices dealing with some major hazards and risk are detailed below:

Health & Safety Manual – external audit by ACS every 3 years
Disaster Recovery Plan – updated annually
Comprehensive Insurance of buildings & office – renewed annually
Independent Internal audit- annually
Business Plan -updated annually
Treasury Management Policy

3. THE CATEGORIES OF RISK TO BE MANAGED

The Co-operative will take steps to identify and manage strategic and operational hazards and the associated risks, as identified in the EVH Developing and Implementing an Effective Risk Management Strategy: A Guide for RSLs, under the following headings: -

Strategic: Political, Economic, social-demographic, technological, legislative and environmental. Latest Pestle analysis

4. WHEN RISK ASSESSMENTS WILL BE UNDERTAKEN

Risk management will build on the Co-operative's existing management arrangements. Strategic risk assessments will take place as a part of the annual review of the internal management plan and prior to making any decisions about significant changes in strategic policy (e.g. relating to growth, diversification, and investment).

5. ROLES AND RESPONSIBILITIES

The roles and responsibilities of the Co-operative are set out below: -

Management Committee

Has overall responsibility for the development, implementation, and review of the risk management strategy and to oversee the effective management of risk by managers of the Co-operative.

The Director

To ensure that the risk management strategy is implemented on a day-to-day basis and that risk is managed effectively across the Co-operative and to develop and maintain the strategic risk schedules for discussion at the Away Day.

Depute Director/Housing Manager

To manage risk effectively in their particular service areas (e.g. housing management, maintenance, finance etc.)

Employees

To manage risk effectively in their job and follow any Co-operative's policies and procedures which have been developed to minimise the risk to the Co-operative e.g. Health and Safety.

Support Services

Would include contractors and support providers such as finance consultant, Solicitors, IT support, technical support etc. to support the Co-operative in the effective development, implementation and review of the risk management strategy.

Internal Auditors

To ensure that the risk management cycle is being rigorously applied and that risks are being effectively managed as a result.

6. RISK FINANCING

Risk financing is an important element of risk management. The Finance Consultant will liaise with operational staff to determine an appropriate balance between losses that are to be financed through external insurance cover, and losses to be met directly from our own resources (self insurance). This will be considered by the Director and the Management Committee prior to final agreement. The approach selected will be influenced by:

- Co-operative's limited capacity to meet the direct cost of exceptional and significant value risks
- The limited previous loss experience
- The commercial rates offered by the insurance market.
- Level of insurance excess

Due to the size and scale of the organisation the Co-operative currently insures for significant losses.

7. ALLOCATING RESOURCES TO RISK MANAGEMENT

The Housing Co-operative is fully committed to resourcing the effective management of risk. Resources will be required for three inter-related purposes:

- To raise awareness of risk management
- To pay for insurance and deal with any retained risks
- To implement risk control actions

The required resource contributions will be identified through the Co-operative's operational planning and budgeting process, following completion of the strategic and operational risk assessment exercises. The required resources will be clearly set out in the Co-operative's budget papers.

8. Cycle for Strategy & Schedules Evaluation

The risk management action plan (attached) will be reviewed annually to assess progress against targets for:

- Reducing the frequency of damaging events occurring
- Reducing the severity of the consequences

9. Developing Strategic and Operational Risk Management Action Plans

An annual review of issues in the Co-operative's operating environment likely to impact on the level of strategic risk faced by the organisation given in the PESTLE analysis in appendix 1, this will be updated annually. To assist Committee and staff consider risk the PESTLE will be considered in the conjunction with an assessment of the organisations internal strengths and weaknesses and external opportunities and threats

Taking into account the PESTLE and SWOT analyses, strategic and operational risk assessments will be developed to seek to identify what hazards may be posed for the Co-operative (i.e. something that may cause injury, damage or loss) and to ascertain the possible risks that these might pose (i.e. the probability that they will occur and with what severity). Both risks and hazards are apportioned a frequency and severity weighting (from 1 to 3) and are multiplied, the out coming factor suggests the likely level of those risks damaging the Co-operative.

Assessment of strategic risks is detailed in appendix 3 and draft risk management strategy in appendix 4. These assessments were based on the strategic risks associated with a business as usual strategy.

Each year at the Away Day the Committee will make judgements about the hazards and risks which need to be taken into account when deciding upon the long term goals and objectives of the Co-operative.

11.0 Using the Risk Schedules

The risk schedules will be used to decide on and record the appropriate course of action to manage the risk.

11.1 Risk Control – take action to minimise them likelihood of the risk event occurring and/ or reducing the severity of the consequences should it occur. There are 3 options for controlling operational risk:

Option1 – Avoidance

Risk avoidance involves the RSL opting not to undertake a current or proposed activity because it has been identified as too risky e.g. in current economic climate set aside the Co-operative's aspiration to develop new houses until grant levels financial position improves.

Option 2 – Reduction

Risk reduction is dependent on implementing projects or procedures that will minimise the likelihood of an event occurring or limit the consequences should it occur. These actions will fall into 2 categories:

Pre-loss reduction actions aimed at reducing the likelihood of a damaging event occurring (e.g. installing roller shutters on office windows and doors and CCTV to deter theft or arson to the office building.)

Post-loss reduction- actions aimed at reducing the consequences of the damaging event should it occur.

Option 3 – Transfer

Risk Transfer involves transferring liability for the consequences of an event to another body e.g. to external insurance provider for the cost of the cover and any excesses.

The cost/benefit considerations and professional judgements are taken on the whether to control the risk or accept and retain the risk.

11.2 Risk Monitoring

The Co-op will monitor and review:

The implementation of agreed control actions
The effectiveness of the action in controlling the risk
How the risk has changed over time

Risks identified as high 7 or above will be assessed on a more regular basis than lower rated risks. The overall aim of this policy is to integrate risk management into the day to day activities of all staff. Committee members will review the implementation of risk management at least annually.

Appendix 1 PESTLE

Political	Economic	Social	Technological	Legal	Economic
BREXIT Scottish Government Elections 2016- volume of legislation impacts on housing- more mandatory tasks set by legislation e.g. SSHC, SPSO, NASSO	BREXIT Credit Crunch – economic recession, pressure on builders, owners, tenants likely long term public spending cuts, upward pressure on taxation	BREXIT West of Scotland higher levels of limiting long term illness than rest of UK and is a major area of funding and project delivery- people living longer	BREXIT Building Regulations and Climate change Act	BREXIT New housing legislation due Climate Change legislation	Ability to fund public services severely affected by reductions in government funding
Post referendum impact of Smith commission and tension between UK and Scottish Govt	Banking and financial markets hesitant to lend without recovering margins on previous loans	Increasing numbers of household formation & Demand for social housing remains high	Increased internet and mobile phone use	2014 Housing (Scotland) Act broader homeless duties – meeting challenge difficult as demand increases	View that there should be a balance between people meeting some of their own costs and state support- to help protect essential services for those who need it most
Conservative Government fiscal policy Key legislation impact on RSL is Welfare Reform Approach to Pensions- auto enrolment impact on costs	Pressure on pension schemes- high cost of maintaining or existing FS pension for employers- impact on strength of the Co- op's balance sheet	Population living longer more complex needs – possible more demand for adaptations	Need to be greener, more sustainable solutions- carbon emissions reductions targets	Changing role SHR RSL's not their role to support failing RSL's set industry standards for governance & Management to protect tenants and other customers interests	Focus on RSL operating efficiencies do more for less- pressure to find other ways of working – possibility of pressure on smaller landlords to merge with larger RSL's if unable to secure continuous improvement
Welfare Reforms- bedroom tax real cut in tenants benefits, UC and to receive rents direct – threat to revenue streams and increase costs of collecting rents- impact on solvency	Housing a vital part of the economy- stimulate economic growth via construction	Deprivation likely to grow, squeeze on budgets of those on lowest incomes Home ownership more difficult to achieve due to lending criteria	Housing Stock – impact of EESH	New standards e.g. carbon emissions without funding to support the policy	Importance of delivering well for tenants. Value for money agenda
HAG subsidy increase but not to previous levels impacting on ability to develop	Uncertainty over inflation rate increase in the near future	Local incomes fall			Pressures on HA costs VFM
	Operating efficiencies				Significant increase in employer

					pension contributions.
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Appendix 2: SWOT

<p>Strengths</p> <ul style="list-style-type: none"> ■ Community Based- tenant controlled and tenants have easy access to staff and services ■ High levels of customer satisfaction – see customer satisfaction survey results ■ High levels of demand & Quality of the stock – meet current SHQS ■ Experienced dedicated staff & low staff turn over, staff in-depth local knowledge ■ Investment Plans for current stock ■ Committee- good attendance, mixed aged, and local knowledge ■ Committee- commitment to training and good governance ■ Property Security & Safe area to live ■ Lower than average rents ■ Excellent repairs service – excellent response time and flexibility to listen to tenants ■ Location & demand for stock & low turnover ■ AFTAR project to maximise tenants incomes and help deal with welfare reform ■ Need to promote all the good things about the Co-op and area to talk the area up ■ General community support and growing involvement in the Co- operative – small responsive to tenants needs ■ Caretaking service ■ General financial headroom- low levels of debt and borrowings on assets co-op owns ■ Partnership working ■ Performance on rent arrears recovery 	<p>Weaknesses</p> <ul style="list-style-type: none"> ■ High management costs ■ Impact of welfare reforms – bedroom tax and Universal Credit where rent paid direct to tenant- significant impact on revenue streams as approx. High level of tenants on HB- cost of collecting rents likely to increase ■ Lower than average rents concern if rent pass onto DWP - if only allow inflationary increases on whatever the rent is when case passes to them ■ Size of stock. Conditions need to be right to grow- overheads spread over fewer units in management than most other RSL's ■ New housing options advice requirement – potential impact on staff time. ■ Unwillingness amongst some tenants to report problems to police /other agencies and Co-op ■ Heavy demands on committee members in relation to training and development. ■ Low response rates to newsletter articles asking tenants for feedback ■ Cost of funding the FS pensions deficit and on-going increasing cost pressure of pensions
<p>Opportunities</p> <ul style="list-style-type: none"> ■ Improve services to ensure members value co-op and demonstrate offer value for money ■ SHR new approach working towards demonstrating compliance ■ Build on success of tenants survey and publicise results of the survey regularly ■ Continue to develop customer focused culture ■ Partnership working – look for opportunities that have a positive impact on our tenants and community by working with other local community organisations ■ Offer Grants/ activities to stimulate tenant interest in the Co-op ■ Community involvement through projects ■ Employment and training opportunities for local people promoted by Co-op ■ Explore any opportunities to share service or diversify into related areas which support core business arise or result in cost savings without affecting quality of service ■ Partnership working with local communities and local authorities and others ■ Making best use of existing resources – continually checking and refining ■ More competitive procurement of repairs contracts due to economic downturn 	<p>Threats</p> <ul style="list-style-type: none"> ■ Takeover/Merger- not a threat if finances and governance remain sound and commitment of committee and tenants to remain independent ■ Takeover/Merger- the threat may arise if impact of welfare reform on revenue affects Co-op's viability and drain on existing staff resources ■ Social Housing Charter (SHC) and ensuring we comply with all new standards ■ Upward Pressure on Rents – to deliver repairs investment needed ■ Lack of take up of home content insurance by tenants ■ Changes to government policy on carbon emissions and energy efficiency ■ Committee numbers ■ New legislation – putting new demands and possibly costs onto the Co-op to deliver core services

Appendix 3 Category	Hazard	Risk	Likely Freq	Seve rity	Score	Control Action	Review Freq
Political	Welfare Reform Act 2012 - Benefits reforms, Bedroom Tax from April 2013, Universal Credit phased in from October 2013- ending direct payments of HB to HHC, Benefit Caps , PIP, regulations being drafted and tested at present	The financial position deteriorates rent arrears increase significantly, tenants' incomes decrease – costs of staff time to collect rents, increased need for advice and support to tenants. Financial viability threatened and Tenants lives become more difficult	3	3	9	Develop strategy to protect Co-op's revenue and assist tenants deal with Welfare Reform GWSF Campaigns AFTAR service Partnership working to try to attract grants for advice services for tenants	Update Strategy Regularly and progress reports on impact to committee
Political	Brexit Changes in government policy to drive down HAG rates and increase % private finance required developing new homes – development of new homes not viable at this time?	If develop then investment in existing homes undermined and overall financial viability of Co-op undermined Less social housing = higher demand	3	3	9	Committee decision to focus resources in existing stock and not to develop new homes	Annual Review to check if grant levels improved
Political	Impact of raising standards for carbon emissions EESH , or cuts in govt spending removal of grants e.g. medical adaptations	Financial position is affected as externally imposed standards rise may have impact of driving up cost/ rents. May benefit customers if houses more fuel efficient as lower running costs	3	2	6	Build relationships all political parties Staff relevant training	Annual
Economic	Economic recession pressure on builders costs, increased cost of borrowing and running businesses and job insecurity	Low interest rates- good for costs	3	2	6	Manage rent increases effectively	Annual
Economic	Pressure on pensions schemes making losses due to poor financial investments performance in the market	The financial position is affected as employer's contributions increase and revaluation due in Sept 2015	3	2	6	Move of all staff to DC scheme though past deficit remains payable	Review summer 2016
Economic	RSL take over	Loss of local control and jobs. Don't know customers or what is important to them.	2	3	6	new continuous monitoring of customer views	Quarterly

Appendix 3 Category	Hazard	Risk	Likely Freq	Severity	Score	Control Action	Review Freq
Social	Anti-Social Behaviour, increase in complaints and vandalism increase	Repair costs escalate and properties become difficult to let and rent lost. Comply with ombudsman new guidance	1	3	3	ASB controlled	Annual
Social	The size of the management committee decreases due to aging and lack of new 'younger' recruits. Committee members lose interest and don't attend meetings regularly	Committee business is disrupted by being inquorate and / or committee numbers fall below minimum numbers	3	2	6	Regularly review how many meetings and format Compliance with SHR standards. Committee recruitment	Annual
Social	The knowledge and skills base of committee members fails to develop sufficiently or keep abreast of developments and changes and meet SHR expectations	Committee members have insufficient knowledge or understanding to maintain effective control of Co-op's business	2	3	6	Follow through with training plans.	Annually
Social	West of Scotland higher levels of long term illness than rest of UK. Population living longer more complex needs – possible more demand for adaptations or housing support	Possible changes to government funding for adaptations – may pass costs to landlords	2	2	4	Review Allocations policy to maximise effective use of voids with adaptations.	Annually
Technological	Technological advances become increasingly expensive and beyond the means of the Co-op-Increased use of mobile phones internet and social networking sites.	Service levels to tenants fall and staff are restricted in their ability to work effectively.	2	2	4	Develop IT strategy to guide renewals & replacements Use social media site to promote work of co-op and encourage tenant feedback	Annually
Legislative	Need to deliver all aspects of the SHC which affect services and other legislative changes e.g. changes to NOP's	For example Voids standards – NOP's impact on arrears procedure, Housing Options advice	3	3	9	Develop proportionate response to housing options advice	Annually
Legislative	New laws such as Equalities Act	Challenges over employment or other practices	2	2	4	Membership of Evh for guidance & Advice. Customer survey's on-going	Annually
Environmental	Increased frequency of storms, rain and extreme cold weather and snow	Increased direct costs through repairs Need to re- house tenants temporarily	2	2	4	Disaster recovery plan	Annually
Competitive	Drop in demand for rehab flats especially	Business failure due to inability to re-let or bring in revenue	3	3	9	Carry out appropriate investment to voids	Annually

Appendix 4 Risk Strategy - Where the risk assessment has identified a risk score of 7 to 9 the under-noted strategies will be adopted to reduce or control the risk or the effects should it come to pass.

Category	Risk	Strategy
Political	Welfare benefit reforms capping the level of benefit and / ending direct mandating of payments, bedroom tax. The financial position of the Co-op will deteriorate arrears rise and more staff resource needed energy to deal this area of work.	Developed a clear strategy which aims to deal with the impact of welfare reform on the Co-op and our customers. Obtained for AFTAR partnership funding and partnership with the Job centre.
Political	New Regulatory Regime with focus on self assessment, financial management, governance renewals and specialist knowledge on committee may put existing committee members off as moving away from community regeneration and control need to comply with SHC standards	MC to review meeting arrangements annually to ensure they suit majority and maximise attendance. Committee make time to attend training. Section by section response to the SHR requirements. Adopted training and development policy and code of conduct.
Political	Green issues such as carbon emissions and energy efficiency	Adopt a strategy to accommodate the requirements of the EESH
Economic	Efficiencies debate do more for less- pressure to find other ways of working- pressure for mergers and controlling costs VFM	Committee review medium and long term financial needs of organisation at least annually. Implement rent setting policy which considers service levels as well as affordability.
Economic	Pressure on pensions scheme making losses due to poor performance of economy - pressure on overall staffing costs with auto enrolment for all employees and question affordability of DB scheme in longer term for Co-op and staff	Staff now members of SHAPS DC scheme
Social	The size of the management committee decreases and the Co-operative business is affected / disrupted due to poor attendance at meetings or failure to meet regulatory standards on governance	Continue to promote membership of the management committee. Approach any member expressing an interest. Where possible target underrepresented groups. Review governance arrangements -Carry out governance self-assessment with Committee against new housing regulators standards
Social	The knowledge and skills base of committee members and staff fails to develop sufficiently or keep abreast of developments and changes-Committee loses interest/ vitality.	Interesting ways of delivering committee training/briefings out with attendance at Conference. Share training with other RSLs
Social	Service is not valued by tenants leading to tenant dissatisfaction with Co-op	Gain understanding and act on tenant's priorities and needs through continuous monitoring of levels of tenant satisfaction.

