

# Appendix 8

## Appendix 8: Risk Register

Title	Risk description	Opp/ threat	Cause	Consequence	Date Raised	Owner	Risk Rating						Comments	Controls				
							Gross I	Gross P	Current I	Current P	Residual I	Residual P		Control description	Due date	Status	Progress %	Action Owner
Income generation not as predicted	Applications reduced or increased and not as predicted	O/T	Income is based on predicted numbers from review of Selective licensing - true numbers will not be known until licensing starts	resources not being matched to demand	Jan 2021	Gail Siddall	3	3	3	2	2	2	Build in flexibility in staffing to increase/decrease if scheme income and costs are out of balance	Provide Net zero budget. Budget based on predicted workload on annual basis and ensure resources aligned				
Scheme not approved	Secretary of State must approve the scheme before it can be implemented	T	The Council do not make a compelling enough case for the introduction of selective licensing	Regulation of the sector would continue to be piecemeal and operated on a reactive basis - leaving many occupiers in the private rented sector living in poor housing conditions. Rogue/criminal landlords would be able to continue to operate with limited resources available to tackle poor practices in a fair and consistent manner	Jan 2021	Gail Siddall							City wide schemes have recently been turned down by the Secretary of State	Ensure that the evidence presented to the Secretary of State provides clear evidence of the need for selective licensing to tackle the poor conditions experienced in the private rented sector throughout the city.				
253 legal challenge / judicial review	The decision to introduce a selective licensing scheme could be subject to a legal challenge via a Judicial Review	T	Statutory requirements not met. Insufficient resources provided to fulfil requirements. Insufficient evidence base. Lack of wider consultation	The time table for introducing the scheme would be altered and extra unbudgeted spending would be required to defend the legal challenge.	Nov 2020	Gail Siddall	3	3	3	2	2	2	A number of challenges have been brought against councils introducing property licensing schemes - for various reasons with varying success	External experts have been employed to ensure that consultation exercise has been undertaken widely - all statutory requirements have been met and robust evidence for proving need for scheme provided				
Insufficient evidence base	The consultation project does not provide sufficient evidence to support an approach for the future of the scheme or is undertaken in an unrealistic timeframe.	Opp and Threat	Lack of interest; insufficient marketing, promotion, inaccurate targeting of audience. Affected by COVID-19 pandemic aftermath	The consultation exercise does not ensure all stakeholders in the private rented sector, including those living within the sector, have a voice. This could lead to uneven responses and insufficient evidence of the need for a scheme.	Mar 2020	Gail Siddall	3	3	3	2	2	2		Ensure that statutory consultation period is satisfied and undertaken at an appropriate time. Independent consultation supplier with appropriate skill base and resources used to carry out consultation to reach all stakeholders				
Recommendations not approved	The recommendations of the report are not approved	Threat	Insufficient support from members to proceed with statutory consultation	Scheme will not proceed and problems in private rented sector will continue to be dealt with reactively	Mar 2020	Gail Siddall	3	2	3	2	2	2		Review and implement appropriate consultation project and ensure requirements of legislation fulfilled.				

Legal challenge	A legal challenge to the proposals is put forward as a judicial review	Opp and Threat	Statutory requirements not met. Insufficient resources provided to fulfil requirements. Insufficient evidence base. Lack of wider consultation	Scheme will not proceed until legal challenge resolved	Mar 2020	Gail Siddall	3	3	3	2	2	2		Ensure that statutory requirements for proving the case for selective licensing is robust and are met and that sufficient resources provided to undertake comprehensive consultation.				
Changes to Government Policy	Change in government policy in relation to Selective licensing schemes which require their approval	Threat	The COVID 19 pandemic may reduce the appetite for regulatory activity including the introduction of discretionary licensing schemes	The government may not approve the scheme or require further evidence from the council	January 2021	Gail Siddall	4	3	4	3	4	3	Government policy will be kept under review throughout the consultation period.	If policy is changed officers will review and inform cabinet				
IT system	The number of applications expected in year 1 will require a robust and tested application processing system	Threat	The current system is not designed to cope with a large number of applications. It requires manual transference of data from one system to another.	Applications not processed in timely manner and staff input into processing will be increased leading to further costs. Reputational damage to the scheme will occur if licences are delayed.	January 2021	Gail Siddall/Mic helle Iddon	3	4	3	4	3	4	The Council is implementing a robotic system to improve efficiencies in the applications process -	The robotic processing is being introduced before selective licensing ( if agreed) will be implemented, giving the opportunity to test the system.				
Impact on the housing market	The rollout of selective licensing may have some unintended impacts on the housing market	Threat	Selective licensing will be used to enable the improvement of standards in the PRS. Landlords will need to pay for a licence, and some landlords will need to invest in their properties to comply with minimum statutory standards. The scheme will also drive financial transparency in the sector, which will not be welcomed by all Landlords.	Some landlords may exit the market and others will rely more on professionals to manage their stock. Others may use the scheme as a reason to justify increasing rents which could impact affordability in the housing market.	Jul-20	Gail Siddall/Nerys Parry	4	3	4	2	3	2		Close working between Regulatory Services and Community Safety and Housing Services to ensure impacts on the housing market, tenants and prospective PRS tenants are considered, closely monitored, and responded to throughout the design process, and into implementation (if licensing goes ahead). Consider how selective licensing and the council's PRS access schemes align (such as Homechoice), to ensure homeless families can access the PRS.		Ongoing		Gail Siddall/Nerys Parry