

Risk Register

Private Sector Housing Enforcement Policy

01 June 2026

				Gross			Current			Target			Control/Mitigation Description	Control Date Due	Progress on Control/Mitigation	Action Owner
Ref	Description	Consequence	Name of Risk Owner	P	I	Score	P	I	Score	P	I	Score				
1	Without a clear standalone enforcement policy reflecting current legislation, enforcement decisions are vulnerable to legal challenge. Some RRA 2025 provisions remain legally uncertain pending tribunal and case law development.	Enforcement actions prolonged or unsuccessful. Increased legal costs and reputational damage.	Courtney Bennett	5	3	15	3	2	6	3	2	6	Standalone policy adopted, drafted from ACEHO model and reviewed by Legal Services. Director-level authorisation built in for policy updates. Officer training prior to implementation. Case law monitored and policy updated accordingly.	ongoing	70%	Courtney Bennett
2	The new policy is applied inconsistently across the service	Enforcement decisions challenged or overturned	Courtney Bennett	4	3	12	3	2	6	3	2	6	Officer training prior to implementation. Final penalty and prosecution decisions approved at Area Manager level or above. Consistency exercises at team meetings.	ongoing	50%	Courtney Bennett
3	Enforcement activity impacts disproportionately on groups with protected characteristics	Legal challenge on equalities grounds. Enforcement decisions overturned. Reputational damage.	Courtney Bennett	4	3	12	3	2	6	3	2	6	Monitoring and scrutiny of enforcement action to identify impacts.	ongoing	80%	Courtney Bennett

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