## Cheltenham Borough Council – Strategic Housing Risk Register – September 2025

Ref	Most recent assessment date	Risk Details	Risk Manager	Current assessment	Change from Last Assessment	Risk Action	Current Control Details	Review Date
CH1	01/07/2025	Housing Revenue Account - If the housing revenue account becomes unviable then this may result in the council being unable to fund service delivery, investment in existing homes and the delivery of new housing.	Gemma Bell	Impact - 5 Probability – 4 Risk score - 20	Increased	Reduce	<ul> <li>Setting deliverable savings targets through the 2025/26 budget setting process</li> <li>Ensure 30 year HRA financial model is in place and is reviewed and updated by regular stress testing.</li> <li>Explore arrangements to re-finance the existing temporary debt taken by the HRA</li> <li>Ongoing action regarding the turnaround of void properties to maximise the rental income generated from the existing stock</li> <li>Develop a strategy for the rationalisation of high value, listed stock or stock which has significant development value to generate capital funding to replace borrowing</li> </ul>	30/09/2025
CH2	27/06/2025	Property Compliance - If there is ineffective management of property compliance then this will result in regulator intervention and reputational damage.	Claire Hughes; Paul Jones	Impact - 4 Probability - 4 Risk score - 16	No change	Reduce	<ul> <li>Effective oversight of property compliance performance by senior officers, Cabinet and Housing cabinet committee.</li> <li>Robust delivery model for each of the big 6 property compliance areas + damp, mould, and condensation.</li> <li>Ensure delivery meets property compliance policy.</li> <li>Development of systems to evidence delivery through consistent data and record keeping.</li> <li>Assurance processes to ensure delivery meets legal requirements and compliance monitoring group - two independent assurance attend (housing quality network and Pennington's for 6 months)</li> <li>External expertise engaged to develop a detailed compliance strategy, review all policies and support with process mapping of procedures</li> <li>Full data validation exercised commissioned to ensure data accuracy</li> <li>Compliance scorecard and performance framework being developed</li> </ul>	30/09/2025
CH4	27/06/2025	Housing Properties Health & Safety - If we do not manage health and safety management of our housing properties, then we may be putting tenant at risk of serious injury or death.	Claire Hughes; Paul Jones	Impact - 5 Probability - 3 Risk score - 15	No change	Reduce	<ul> <li>Clear health &amp; safety procedures in place with evidence these are followed.</li> <li>Regular independent assurance that health and safety is being management effectively.</li> <li>Effective oversight of health and safety performance by senior officers, Cabinet and Housing Cabinet committee.</li> </ul>	30/09/2025
СН6	14/07/2025	Housing Regulatory & Legal Requirements - If we fail to meet regulatory and legal requirements, specifically the Regulator for Social Housing consumer standards and the Housing Ombudsman Complaints Handling Code then this may result in intervention and reputational damage.	Claire Hughes	Impact - 4 Probability - 3 Risk score - 12	No change	Reduce	<ul> <li>Self-referral made to regulator – no regulatory judgment issued.</li> <li>Effective oversight of regulatory performance by senior officers, Cabinet and Housing cabinet committee.</li> <li>Delivery of Improvement Plan</li> <li>External expertise in place to support compliance with the standards including mock inspection.</li> <li>Annual self-assessment of compliance with the Complaints Handling Code (published to tenants and HO.</li> </ul>	30/09/2025

							- New resource added to the improvement programme team     -External expertise has been engaged on policy development, compliance strategy and data validation     - Full review of consumer standards gap analysis is underway     - Inspection readiness evidence bank is being created	
СНЗ	14/07/2025	Stock Condition Data - If there is a failure to maintain accurate, in date stock condition data then this means we are unable to plan spend, evidence investment, demonstrate accurate decent homes data and provide assurance that tenant's homes are safe.	Claire Hughes	Impact - 4 Probability – 3 Risk score - 12	Reduced	Reduce	<ul> <li>Effective oversight of property compliance performance by senior officers, Cabinet and Housing cabinet committee.</li> <li>Maintaining up to date stock condition data.</li> <li>Using data to prioritise property investment and address decency / H&amp;S issues.</li> </ul>	30/09/2025
				Probability			<ul> <li>Effective use of resources</li> <li>Hit 20% stratified sample 21/02/2025</li> <li>30% overall sample 21/03/2025</li> <li>40% of surveys completed as at 29 April 2025.</li> <li>Data analysis has commenced. However, until stock condition surveys have been completed and fully analysed we still cannot fulfil the requirements of the TSM question on decent homes or be assured that we are fully meeting the decent homes standard.</li> <li>Weekly meetings taking place with RAND to ensure that keep up momentum</li> <li>Reviewing staffing structures to ensure stock condition surveys become BAU and programmes on are a rolling cyclical basis</li> </ul>	
CH5	01/07/2025	Tenant Satisfaction - If there is a decline in the quality of services delivered to tenant's, then this may result in reduction in customer satisfaction (evidenced through the TSMs) affecting the quality of life experienced by residents in Cheltenham and leading to referral to the Housing Ombudsman and/or Regulator for Social Housing.	Caroline Walker	Impact - 4 Probability - 3 Risk score - 12	No change	Reduce	<ul> <li>Effective oversight of service delivery performance by senior officers, Cabinet and Housing cabinet committee.</li> <li>Review and monitoring of service standards.</li> <li>Effective tenant voice and listening and acting on tenant feedback.</li> <li>Learning from complaints.</li> <li>Review of national TSM data</li> </ul>	30/09/2025
295	01/07/2025	Compliance with Property Legislation & Regulations - If we are not compliant with relevant legislation / regulations in all operational CBC properties then this may result in accidents resulting in reputational damage, fines and potential corporate manslaughter charges.	Gemma Bell	Impact - 4 Probability - 3 Risk score - 12	No change	Reduce	- Compliance Officer in post - External Advisors being utilised - Increased resource capacity of building surveyors - Planned maintenance work to understand structural risks and plan remedial work - Review of registers & risk assessments - Internal Audit of compliance with assurance opinion and actions for implementation	30/09/2025
216	23/06/2025	Rough Sleeping Accommodation - If there is insufficient emergency accommodation for households to access in times of emergency (e.g. extreme cold weather) or overnight emergency, then there could be injury to the household.	Martin Stacy	Impact - 3 Probability - 4 Risk score - 12	Increased	Reduce	Improving pathways     Additional emergency accommodation provision     Review numbers of rough sleepers on a regular basis	11/11/2025

CH7	14/07/2025	If the management of void properties does not improve then this will lead to increased costs associated with additional use of temporary accommodation, reduced rent collection and failure to comply with the statutory timescales in relation to the use of temporary accommodation	Paul Leo	Impact - 4 Probability - 3 Risk score - 12	No change	Reduce	New contract has been procured     Active monitoring of turn around times     Interim manager in place to provide Additional support and guidance     Increase and in staffing numbers, supporting capacity	30/09/2025
188	25/06/2025	If the number of asylum seekers and refugees and homelessness generally continues to increase in Cheltenham, and there is insufficient accommodation to meet the demand for housing then there will be increased pressures on homelessness and rough sleeping services,	Martin Stacey	Impact - 4 Probability - 4 Risk score - 16  Probability  Probability	New	Reduce	-Ensure any decisions regarding future pledges to use social housing are backed up with clear data on impact on local housing need and can be justified in the context of relatively adequate supply (i.e. where there will be least impact on local need).  -Challenge any proposed increase in provision by the Home Office where there are legitimate concerns regarding the provision of Dispersal Accommodation in that area.  -Keep under review the county-wide Protest Plan, and ensure it is triggered when appropriate.  -Utilise grant funding from the Home Office to support relevant agencies whose resources are impacted on as a result of increased numbers of asylum seekers (CWR, GARAS, nhs, police, Housing Options, Employment & Skills hub, etc.)  -Commission new services for asylum seekers (utilising Home Office grant funding) with a focus on language learning, navigation through health and wellbeing services, community integration, and assistance with claims for asylum  -Continue to maximise the delivery of affordable housing via CBC's housing enabling functions and CBC's housing development team	30/09/2025