

# Risk Management Policy

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| <i>Purpose:</i>                          | To establish DPHA's policy to set out our position on the identification and management of strategic and operational risk.                                    |
| <i>Date:</i>                             | May 2018  |
| <i>Review Date:</i>                      | May 2021  |
| <i>Regulatory Standards:</i>             | Standard 4<br>The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation's purpose. |
| <i>Approved by Management Committee:</i> | 16 May 2018   |

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## **1 INTRODUCTION**

- 1.1 DPHA is registered under the Co-operative and Community Benefit Societies Act 2014, a Scottish Registered Charity and registered with the Financial Conduct Authority (FCA). We are a Registered Social Landlord (RSL) registered with the Scottish Housing Regulator (SHR) since 2000 and in accordance with the Housing (Scotland) Act 2001. Dalmuir Park Housing Association (DPHA) was registered as a social landlord in 1978 and operates in the Clydebank area of West Dunbartonshire. DPHA is also a registered charity with the Office of the Scottish Charities Regulator (OSCR) since 2002. We currently own and manage 689 homes and provide factoring services to 174 owners. This includes 2 sheltered housing complexes and 26 shared ownership homes.
- 1.2 DPHA has charitable status and we employ circa 30 staff, with the majority engaged on our care and support activity.
- 1.3 We are registered with the Care Inspectorate for the provision of support to customers on our 2 sheltered housing complexes and pre and post school support to up to 70 children from our 3 local schools via our Dalmuir Out of School Care Group (DCSCG) project.
- 1.4 DPHA assisted in setting up the Beardmore Trust, a registered charity aimed at attracting funding to promote community development. Whilst DPHA has no formal legal relationship with the Trust, it is closely connected to DPHA and provides a meal service to DPHA's sheltered tenants. We are therefore currently providing management support to address constitutional failings at the Trust to then allow it to make decisions about its future.

## **2 RISK MANAGEMENT STATEMENT**

- 2.1 We promote the integration of risk management in the governance and management of our business. Risk management flows through our business at both strategic and operational levels.
- 2.2 The purpose of this risk management policy is to ensure that we achieve our stated business and strategic planning aims and objectives whilst identifying and managing the challenges and risks which may be encountered.

## **3 REGULATORY EXPECTATIONS**

- 3.1 The Scottish Housing Regulator (SHR) sets clear expectations about the importance of risk management in its Regulatory Standards of Governance and Financial Management. Specific relevant requirements are as follows:

- ***RS 3.2. The governing body fully understands the implications of the treasury management strategy it adopts, ensures this is in the best interests of the RSL and that it understands the associated risks.***
- ***RS 3.3. The RSL has a robust business planning and control framework and effective systems to monitor and accurately report delivery of its plans. Risks to the delivery of financial plans are identified and managed effectively. The RSL considers sufficiently the financial implications of risks to the delivery of plans.***
- ***RS 3.5. The RSL monitors, reports on and complies with any covenants it has agreed with funders. The governing body assesses the risks of these not being complied with and takes appropriate action to mitigate and manage them.***
- ***RS 4.3. The governing body identifies risks that might prevent it from achieving the RSL's purpose and has effective strategies and systems for risk management and mitigation, internal control and audit.***

#### **4 OUR POLICY OBJECTIVES**

- 4.1 Risk is defined as a probability or threat of damage, injury, liability, loss, or any other negative occurrence that is caused by external or internal vulnerabilities and that may be avoided through pre-emptive action.
- 4.2 Risk Management is defined as identification, analysis, assessment, control and avoidance, minimisation or elimination of unacceptable risks. An organisation may use risk assumption, risk avoidance, risk retention, risk transfer, or any other strategy (or combination of strategies) in proper management of future events.
- 4.3 This policy aims to provide a clear and systematic overview of our approach to risk management, covering how we identify risks, assess their likelihood of occurring and their impact on the organisation and, finally, how we then respond to these risks to effectively manage them.
- 4.4 Risk Management is an integral part of our strategic planning and decision-making processes. For new initiatives and projects, risk assessment and management will be used to inform our decision-making process and to ensure that approved projects are delivered successfully.
- 4.5 Risks that could affect our medium to long-term goals are considered strategic risks. Risks that will be encountered in the day-to-day delivery of services are considered operational risks.
- 4.6 We consider the materiality of risk in developing our responses through the statement of our appetite or threshold for risk.

## 5 IMPLEMENTING OUR POLICY OBJECTIVES

### 5.1 Types of Risk

- 5.1.1 Risk permeates all aspects of life; private and public. For the purposes of this policy we are addressing strategic and operational risks. This does not include health and safety type risks which are addressed through various other organisational policies and procedures.
- 5.1.2 The bulk of our risk management activity focuses on strategic risks; those that would prevent us achieving our strategic goals in whole or in part. We also cover operational risks; those that would impact upon our actual delivery mechanisms (e.g. buildings, staff and infrastructure).

### 5.2 Identification

- 5.2.1 We undertake a process of risk identification against our strategic goals and strategic areas of operation. Risks are identified and reviewed by our Management Committee and leadership team on an annual basis, with additions and changes being made throughout the year as required.

### 5.3 Assessment

- 5.3.1 Following the identification process, we then move to an assessment stage. This involves examining the detail behind each risk, identifying the mechanisms to limit or remove the risk and then allocating each risk a score based on likelihood of occurrence and its likely impact on the organisation. Appendix 1 sets out the considerations in allocating a score.
- 5.3.2 When exploring the detail behind each of our identified risks we are looking at the causes and consequences of the risks. This helps us to build a better picture of the risk landscape, identifying commonality in terms of the factors causing the risks, as well as the likely possible consequences of these.
- 5.3.3 We then begin to look at the control measures which are, or can be put in place, to limit or remove the risk. Behind these controls we are building up a list of actions that will need to be delivered in order to make the control fully effective.
- 5.3.4 We are then able to score each of the risks, which is done based on likelihood multiplied by impact. Each of these elements is scored between 1 and 5, providing a risk score between 1 and 25, with 25 being the highest risk. We then consider 3 separate areas during this process as follows:
  - Pre-control measures – this takes the identified risk and allocates a score and risk level based on an assessment of the risk with no controls in place, this is the worst-case scenario.

- Post control measure – this takes the risk and revises the score and risk level after applying controls.
- Status – This updated the risk on the current position to reflect status, planned activity, any changes in the risk with the passage of time.

## 6 MANAGEMENT OF RISK

- 6.1 Ongoing management of our risk register takes place through quarterly reporting to our Audit and Risk Sub Committee and annual review by our Management Committee. The Audit & Risk Sub Committee will scrutinise the risk management processes as well as the risk register itself.
- 6.2 All the controls and actions are detailed within the system and are allocated to officers responsible for them. This allows us to work towards the completion of all actions which, in turn, ensures that controls are active.

## 7 ROLES AND RESPONSIBILITIES

### 7.1 Management Committee

The Management Committee as governing body are responsible for risk overall. The Management Committee delegates responsibility for risk management and assurance to officers and the Audit & Risk Sub Committee respectively. The Management Committee also play an important role in risk identification and assessment through its annual Business Plan process, through each report it considers and through annual review of the Risk Register.

### 7.2 Audit & Risk Sub Committee

The Audit & Risk Sub Committee plays an important role in terms of risk assurance. Their remit includes the examination and scrutiny of the processes that have been put in place to identify, assess and manage risk within DPHA and regular review of the Risk Register.

### **7.3 Management Team**

The Management Team of DPHA are responsible for ongoing risk identification and management. This takes place within annual strategic planning processes, as well as on an ongoing basis throughout the year. Once risks have been identified they are added to the risk register, assessed and managed appropriately. The Lead Officer also has responsibility for monitoring of the risk management process, ensuring that risks are identified, assessed and managed.

## **8 POLICY REVIEW**

This policy will be reviewed on a three-yearly basis unless any changes are required before this.

## RISK ASSESSMENT & SCORING - Appendix 1

| Impact (on the business)         |                |   |
|----------------------------------|----------------|---|
| 5                                | Extreme        | Reputation - Sustained widespread media critical coverage. SHR statutory intervention & potential transfer of assets. |
|                                  |                | Financial Loss more than £1m  |
|                                  |                | Service Delivery - Significant disruption of the whole organisation   |
|                                  |                | Legislative - legislation has significant impact on the whole operation   |
| 4                                | Major          | Reputation - Prolonged National Media Exposure. SHR statutory intervention.   |
|                                  |                | Financial Loss between £250k and £1m  |
|                                  |                | Service Delivery - Significant disruption of large parts of the organisation  |
|                                  |                | Legislative - legislation has significant impact on a key area  |
| 3                                | Moderate       | Reputation - One-off National Media Exposure. SHR engagement - Regulation Plan  |
|                                  |                | Financial Loss between £50k and £250k   |
|                                  |                | Service Delivery - Significant disruption of one part of the organisation   |
|                                  |                | Legislative - legislation has moderate impact on a number of functions.   |
| 2                                | Minor          | Reputation -Prolonged Local Media Exposure. SHR engagement  |
|                                  |                | Financial Loss less than £50k   |
|                                  |                | Service Delivery - Minimal disruption of the whole organisation   |
|                                  |                | Legislative - legislative impact affects small number of procedures.  |
| 1                                | Insignificant  | Reputation - One-off Local Media Exposure.  |
|                                  |                | Financial Loss - Negligible financial impact  |
|                                  |                | Service Delivery - Minimal disruption of one part of the organisation   |
|                                  |                | Legislative - minimal Legislative Implications  |
| Likelihood (of risk manifesting) |                |   |
| 5                                | Almost Certain | The risk is almost certain to occur (greater than 80% chance)   |
| 4                                | Likely         | The risk is more likely to occur than not (between 51% and 80% chance)  |
| 3                                | Possible       | The risk is fairly likely to occur (between 21% and 50% chance)   |
| 2                                | Unlikely       | The risk is unlikely but not impossible to occur (between 6% and 20% chance)  |
| 1                                | Rare           | The risk is unlikely to occur (<5% chance)  |

|        |   |            |    |    |    |    |
|--------|---|------------|----|----|----|----|
| Impact | 5 | 5          | 10 | 15 | 20 | 25 |
|        | 4 | 4          | 8  | 12 | 16 | 20 |
|        | 3 | 3          | 6  | 9  | 12 | 15 |
|        | 2 | 2          | 4  | 6  | 8  | 10 |
|        | 1 | 1          | 2  | 3  | 4  | 5  |
|        |   | 1          | 2  | 3  | 4  | 5  |
|        |   | Likelihood |    |    |    |    |

|  |                           |
|--|---------------------------|
| Risk Score = Business Impact x Likelihood of occurring |                           |
| 15 or more   | Risk Score is High        |
| 8-12   | Risk Score is Significant |
| 4-6  | Risk Score is Moderate    |
| 3 or less  | Risk Score is Low         |