

#### Appendix 4: Lettings Policy Review 2017 Risk register

Proposal	Description and consequences	Risk rating	Action counter measure	Risk owner
<b>Tenant transfer policy</b>	Increased complexity in lettings policy	High	Review communications to tenants and housing applicants Implement once new CBL website is launched. Website will have clear labelling of quotas	Leeds Homes Housing Leeds
	Insufficient demand from tenants	High	Properties clearly advertised as preference to tenants, but shortlisting to revert to non-tenant groups in event of insufficient demand	Leeds Homes Housing Leeds
	Increase in number of voids	High	Ensure tenancy checks are completed to reduce void costs and times where possible (ie properties should be in good condition / allow back to back re-lets) Some transfers will be from joint tenants who leave other tenant in situ, so not all transfers will free up a property	Area Housing Management Housing Leeds
	Increased voids may affect calculation for Higher Value Homes as levy is calculated on actual voids	Very high	Monitor no. voids released through transfer quota. Awaiting further guidance from DCLG on High Value Homes	Housing Leeds
	People in housing need and protected groups miss out on lettings	High	Breakdown within the transfer quota to 50-50 between waiting time and housing need Overall the proportion of lettings to people in housing need will increase	Lettings and Tenancy Management Housing Leeds
	Discrimination claims from non-tenants as happened in Ealing case	High	Review issues in Ealing case, ensure policy is clear and monitored to pick up on issues, action plan from EIA	Lettings and Tenancy Management Housing Leeds
<b>Tenancy record / home visits</b>	Increase in void time pending checks being arranged and completed	High	Where possible use previous Annual Home Visit (AHV) outcome for council tenants, prioritise which allocations decisions require a home visit, use desktop assessments to rate risks	Lettings and Tenancy Management Area Housing Management Housing Leeds
	Resources required to complete home visits	High	As above, use AHV outcomes and prioritise visits	Lettings and Tenancy Management Area Housing Management Housing Leeds

	Complaints of younger people moving in if age restrictions replaced by visits	High	Communication with tenants Swift tenancy enforcement where appropriate Prioritise blocks where little demand at current age and based on block profile information	Lettings and Tenancy Management Area Housing Management Housing Leeds
<b>Pre tenancy training</b>	Resources required to deliver training programme	High	Full evaluation of pre tenancy training Prioritise training for 16 and 17 year olds, people with failed tenancy and people who have not held a tenancy before	Lettings and Tenancy Management Area Housing Management Housing Leeds
	Risk that void time increases while customers wait to complete training	High	Identify people at point of registration on housing register / priority assessment	Housing Support Housing Leeds
	Discrimination claims from customers who are unable to attend / complete	High	Ensure pre-tenancy training programme looks at potential equality issues and action plan from EIA	Lettings and Tenancy Management Area Housing Management Housing Leeds
<b>Children at height</b>	Risk of challenge from tenants where blocks are redesignated	High	Evidence base has been used to select blocks for children at height Local consultation / communication with tenants	Area Housing Management Housing Leeds
	Risk of challenge from other applicants waiting for rehousing if families living at height with children are rehoused ahead of them	High	Ensure policy is clear Monitor outcomes	Lettings and Tenancy Management Housing Leeds
	Expectations of families with children at height that can move out quickly – will depend on availability of alternative housing	High	Clear communication / information on likely waiting times	Lettings and Tenancy Management Area Housing Management Housing Leeds
	Resource implications for Housing Leeds and to tenants of supporting tenants move	Medium	Needs to be built in to business plan / monitored	Area Housing Management Housing Leeds

<b>Good neighbour</b>	Risk of challenge that we 'vet to let'	High	Retain / use only in areas where it can be justified and agreed with Community Safety and West Yorkshire Police	Lettings and Tenancy Management Area Housing Management Housing Leeds
<b>Local connection</b>	Potential for challenge on equality grounds	High	Ensure use of local connection is justified based on ward profiling information, review procedures to include guidance to lettings staff on potential exemptions, eg where enforcing strict definition would result in hardship	Lettings and Tenancy Management Area Housing Management Housing Leeds
<b>Age restrictions</b>	Reduces risk of challenge from customers under 40 years old, but may have complaints from existing tenants	High	Decisions to be based on profiling information and move to risk-based assessments is linked to management and investment models, consultation with tenants and residents on changes to individual blocks	Lettings and Tenancy Management Area Housing Management Housing Leeds
<b>Affordability checks</b>	Potential to bypass applicants who cannot afford full rent	Medium	Base decisions on individual income and expenditure assessment Apply for Discretionary Housing Payment / refer to support re budgeting etc Investigate alternative solutions eg shared tenancies etc	Lettings and Tenancy Management Area Housing Management Housing Leeds
<b>Civica changes</b>	National Insurance numbers and email addresses	Medium	Will help prevent application fraud, and enable customers to register for the online system but may exclude certain groups, provision to allow people to register and bid using alternative methods.	Leeds Homes Housing Leeds
	Stricter Qualification criteria decision triggers could impact unfairly on certain customer groups	High	Assessment will consider the applicant's individual circumstances at the time the arrears accrued or when the unacceptable behaviour took place and at the time the housing application is made	Lettings and Tenancy Management Area Housing Management Housing Leeds
	Creation of Band D would mean some customers are placed in lower band reducing their chances of being rehoused	High	Risk of increase in numbers registering for housing who have no assessed housing need, aren't eligible for council homes, have no connection to Leeds, or who own their own home. Will create new Band D. Communications with these groups to advise of impact and how long they are likely to wait for rehousing.	Lettings and Tenancy Management Housing Leeds
	Advertising of 'fast track' properties may be unfair	Medium	Alternative is risk of increased void times and empty properties, all fast track properties will already have been	Leeds Homes Housing Leeds

	to people who are unable to access Leeds Homes		through at least one advertising cycle. Previously we operated 'first come first served' which was suspended due to ICT limitations	
	Some customers not able to access system to place bids, or bid on properties that don't match their requirements.	Medium	Support / alternatives for customers who can't access the system. The new system will warn customers of inappropriate bids and have the option to automate bids on suitable matching homes.	Leeds Homes Housing Leeds
	Band D properties and date of registration	High	For allocations through Leeds Homes Band D cases would only be shortlisted after customers in Bands A to C. Will not affect customers in assessed housing need, or those with a connection to Leeds.	Lettings and Tenancy Management Area Housing Management Housing Leeds
	Matching and bypasses	High	Proactive matching for adapted properties Customers seeing real time position on shortlists and info on why they have been bypassed – will not include feedback where bypass relates to sensitive risk information.	Housing Support & Area Housing Management Housing Leeds
	Making offers	High	Verification of original documentation for example on identity, current housing circumstances and housing need will be done prior to offer	Area Housing Management Housing Leeds