

HTS (Property Environment) Ltd Strategic Risk Register

Likelihood	Almost Certain	5	11	16	20	24	28
	Likely	4	7	12	17	21	24
	Moderate	3	4	8	13	18	22
	Unlikely	2	2	5	9	14	19
	Rare	1	1	3	6	10	15
Risk Rate Matrix		1	2	3	4	5	
	Insignificant	Minor	Medium	Major	Catastrophic		
		Impact					

Appendix A

Objective	Risk Name	Risk	Background	Likelihood	Impact	Risk Owner	Inherent Risk Score			Controls already in place	Residual Risk Score			Foreseeable Risk Score			Additional actions to mitigate risk (4Ts)	Target Date
							Likelihood	Impact	Score		Likelihood	Impact	Score	Likelihood	Impact	Score		
Financial Performance	SR01 - Financial Sustainability	If a sustainable budget is not secured, then HTS will lack financial resilience	HTS has been set up as a LATC, wholly owned by HDC with a five year contract in place. ASC budgets were set with JVCo baseline 2015/2016 and need to be managed going forward to maintain financial sustainability of the company.	Job priorities may impact on KPI achievement, management of client expectations, efficiencies, management of employee sickness, maintenance and replacement of assets, payscales alignment	Pension, failure of KPIs, penalties from HDC, external market wage rates pressures, service delivery	Alex Morris, Finance Director	3	4	18	change notice, job variation meetings, budget monitoring, Joint Performance meetings, JPRM, Management Account meetings, quarterly reviews, cash flow, VCR meetings, auditing of accounts, forward planning on replacement of assets (5 year plan)	2	4	14	2	4	14	callsys interface with orchard to manage job ticket priorities. Interfaces occur at when job is raised, complete and invoiced.	Annual review
Business Growth	SR02 - Business Sustainability	If the business does not develop and grow, then it will stagnate and ultimately fail	HTS needs to grow business beyond its existing HDC contract in order to develop and survive and meet employee and shareholder expectations for future opportunities	Perception of environmental performance by HDC versus contracted performance, KPI measurement and analysis, delayed capital works, failure to award additional capital works, ability to secure third party works and deliver at profit, capacity to deliver third party services	reputation, bottom line, morale, negative employee culture, productivity and service delivery, business growth, loss of key employees, inability to win new third party contracts, loss of existing third party contracts	Neil Rowland, Commercial Director	4	4	21	Joint Performance Meetings, JPRM, quarterly reviews, balanced scorecard reviews, KPI reviews, weekly performance and productivity reviews, vehicle tracking monitoring, opportunities register, joint board/member meetings, tenant and leaseholder engagement, accreditations	3	4	18	2	4	14	opportunities register, GIS mapping and route optimisation, innovations, marketing materials and presentations and case studies of efficiencies already achieved	Annual review
Operational Performance	SR03 - Operational Delivery	If HTS fails to deliver services on a consistent satisfactory basis, then the business may receive negative perception leading to failure to maintain and extend contracts	Inheritance of an ageing workforce may result in loss of local knowledge and expertise when they leave. HTS requires to resource existing and future employees along with external supplychain to ensure continuous satisfactory delivery of services and third party contracts	Government legislation changes, statutory regulations changes, KPI measurement and analysis, capacity to deliver third party services, resourcing against peaks and troughs and specialist trades, client expectations, perception vs actual performance, budget and seasonal variations, ageing workforce, incentivisation for employees	reputation, bottom line, employee opportunities, morale, negative employee culture, productivity and service delivery, business growth, loss of key employees, KPI penalties	Steve Ward, Operations Director	2	4	14	Joint Performance Meetings, JPRM, quarterly reviews, balanced scorecard reviews, KPI reviews, weekly performance and productivity reviews, vehicle tracking monitoring, change notices, tenant and leaseholder engagement, accreditations, ASC meetings, subcontractor and agency budget monitoring, efficient processes investment, Business Continuity Plan	2	4	14	2	4	14	compliance software, additional employee training, succession planning, continual training and development, apprenticeships, work experience employees, payscales reviews and alignment	Annual Review
Culture	SR04 - Employee Engagement	If HTS fail to engage it workforce, then there are consequences to delivery and success of the business	An engaged and happy workforce is a productive and effective workforce 'Proudly Serving Harlow' reflecting the HTS brand.	morale, incentivisation and engagement of workforce, training budgets and resource, quality of external candidates, salary packages, pension/pay flexibility, terms and Conditions of employment	VFM review in year 3, morale, lack of workforce engagement, reduced productivity, accidents, poor attendance, reputation, employee expectations	John Philips, Managing Director	3	4	18	Quarterly employee engagement, monthly union meetings, quarterly staff newsletters, balanced scorecard, staff award scheme, staff discount cards, PPRs, vehicle tracking monitoring, IT investment, asset investment, succession planning, training plans, 1-2-1s and Team meetings, Living Wage employer	3	4	18	2	4	14	employee satisfaction surveys, incentivisation schemes, employee conference and awards, succession plan, flexible working and retirement, future pay reviews, equal pay	Annual Review
Compliance	SR05 - Information Governance and Data Compliance	If HTS does not adopt holistic and robust response to data information and governance, then it may be unable to demonstrate statutory compliance.	An Information Governance Framework is required to ensure information is dealt with efficiently, effectively and in compliance with statutory provisions and regulations. The General Data Protection Regulations (GDPR) applies from 25 May 2018, replacing the Data Protection Act 1998, imposing a much tougher data protection regulatory framework. Also on the horizon is Electronic Data Protection Regulation (EDPR)	GDPR requirement to notify breaches within 72 hours. Changes to Subject Access Requests (SARS). It is necessary to evidence compliance in all areas of GDPR. There are changes to the way consent is obtained and individual's rights over data held about them.	Breach and non-compliance carries risk of enforcement action and increased financial penalties from the Information Commissioners Office (ICO). Reputation would suffer.	Tim Page, HR Manager	4	4	21	Data Protection & Security Policy in place. Privacy Impact Assessments in place (HTS format). Breach log in place (HTS format) and incidents reviewed & closed out. DPO in place and formally appointed. Deputy DPO identified internally. Full training carried out for key staff and toolbox talks provided for all staff. Data cleanup actioned. Variation to Services Agreement to align it for GDPR compliance has been signed and sealed. Actions from Z7001 gap analysis mostly closed out.	3	3	13	3	3	13	Cyber security policy reviewed but requires further review in January 2019. Carry out DPO training which has been identified. Ongoing employee awareness and training required along with poster campaign. Continue discussions and work to align Privacy Impact Assessments and Breach log with Harlow Council format.	Monthly Review

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Operational Performance	COMMERCIAL, PROCUREMENT & PERFORMANCE DEPARTMENT (Performance)	Contract Performance	If we fail to manage our operations, then we may not achieve the required success rate on contracted major and minor KPIs	HTS (P&E) Ltd must manage and report contractual KPI's and statutory compliance to HDC to provide assurance on performance of the contract.	Failure to gather, report or meet the KPI's. Reliance on single individual across areas to compile the reporting information.	Damages Incurred, loss of revenue, reputational damage and loss of contract with Harlow Council. In addition initiation of improvement plans would be required to bring performance back to required standard.	Neil Rowland	4	4	21	Gather the information from various service areas and produces reports internally on a monthly basis and externally on a quarterly basis. Reports provided to the performance manager who undertakes an audit, forwards to contracts manager for sign off. Reports also shared in operational meeting with Harlow Council, at JPRM (senior management level), HTS Board, and shareholder sub-committee. Reports are discussed in monthly meetings with exception of HTS Board and Shareholder sub committee which is on a quarterly basis. Once reports are agreed, they are released to HDC for quarterly reporting.	2	4	14	2	4	14	Upskilling to ensure more than one employee has knowledge of areas such as KPI audit	Monthly
Operational Performance	COMMERCIAL, PROCUREMENT & PERFORMANCE DEPARTMENT (Performance)	Transparency	If we do not report performance or report incorrectly, then we will not be able to validate HTS performance to external parties.	HTS has an obligation to demonstrate transparency and provides reports to do this (e.g. volume drivers, measurements and 'right first time').	Failure to gather data, provide reports or audit of information	Incorrect reporting. Inability to provide transparency and validation. Challenge from residents and leaseholders and reputational damage.	Neil Rowland	4	3	17	Communication, courses, trackers, case studies	2	2	5	2	2	5	Upskilling to ensure more than one employee has knowledge to gather and report on performance	Monthly
Financial Performance	COMMERCIAL, PROCUREMENT & PERFORMANCE DEPARTMENT (Purchasing)	Purchase of Goods	If we are unable to provide value for money goods, then it will affect the cost of services and underlying profits. This will impact on the performance as the KPI's may not be met (timescales to complete works)	Reducing expensive stocks of goods in warehouse creates financial operating efficiencies. HTS strives to purchase value for money goods with efficient delivery.	Reliance on a single supplier (contractual obligation), Just in time process which replace stores - this does reduce cost but adds complexity. Some materials may have volatile costs.	Increased costs of working (including increased cost of goods) delays in works completion, failure to meet KPI's, identification of alternative suppliers within a reasonable time frame. Inefficiency of labour displacement.	Steve Ward	3	4	18	Alternative suppliers, PFH - procurement for Housing (benchmark suppliers and provide fixed costs). Labour force could operate in another area - multi trade work force. Internally procurement team (2 purchasing partners)	2	2	5	2	2	5	On Going development of work force. Relief event if there was a national shortage (part of contract)	Monthly
Culture	FINANCE & BUSINESS SUPPORT DEPARTMENT (Business Support/Governance)	Complaints Handling	If customer complaints are not dealt with properly, then opportunities to improve working practices and processes may be missed	Customer complaints need to be managed efficiently within timescales and learning points addressed.	Efficiencies in dealing with the complaints and in the right manner. How the investigation is handled. How identified learning is fed back to the business.	Reputational damage, adverse reputational risk, financial risk (compensation), resources for escalation of complaints. Failure to meet legislative requirements and contract failure.	Neil Rowland	3	3	13	Set timescales, escalation process for each stage, monthly meeting with performance manager looking at trends. Complaints officer from HDC reviews performance. Audit by HDC of responses (Simon Piper) - decision may be changed upon review. Reviewed as per first risk. Learning points and following trends fed back into business via departmental managers as per reports issued for improvements - managers then provide further training/tool box talk etc to team. Post works inspections by both parties (aim up to 10%). Disiplinary action	2	2	5	2	2	5	Additional Training (tool box talks) Disiplinary action. Achieve Customer Service Excellence Accreditation.	Monthly
Compliance	FINANCE & BUSINESS SUPPORT DEPARTMENT (Business Support/Governance)	Statutory Compliance	If statutory compliance testing requirements are not met, then the Council's tenants may be at risk.	Compliance testing must be carried out within statutory timeframes	Compliance communications also need to be sent out accurately and on a timely basis. Timely issue of letters in advance of the works.	Reputational damage, adverse reputational risk, financial risk (compensation), escalation of complaints. Failure to meet legislative requirements and contract failure. Risk of injury/death/explosion sustained to residents. Prosection by HSE	Steve Ward	4	5	24	10 Month cycle, strict no access procedure and court proceedings issued to take action within 45 days. IT system that provides reporting process and sub contractors if required (if sickness of internal staff). Provided in monthly reporting. If gas appliance is fitted externally - turn off gas supply from mains, take photos	1	5	15	1	5	15		Monthly
Financial Performance	FINANCE & BUSINESS SUPPORT DEPARTMENT (Finance)	Cash Flow	If HTS does not manage cash flow adequately, then it will be unable to meet its financial obligations	It is imporant to properly manage cash flow to avoid extended cash shortages and ensure the business can meet its financial obligations	Management of cash flow - financial planning, unable to meet financial liabilities	Unable to pay suppliers and staff, failure of supply chain, staff morale, failure of business	Alex Morris	4	4	21	Financial planning system in place, financial monitoring, across service discussions (monthly management meetings) 2 director sign off on all payments. Building a reserve. Costs from contractor paid month in advance before liabilities are paid. Sage System in place.	2	3	9	2	3	9	Building a reserve and Financial monitoring	Monthly

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Financial Performance	FINANCE & BUSINESS SUPPORT DEPARTMENT (Finance)	Budget Monitoring	If financial performance is not regularly monitored, then HTS may overspend its budget	It is necessary to monitor and control variances between budgeted amounts and actual financial performance to determine how well HTS is meeting its goals and controlling costs	Lack of budget control or contract monitoring. Cost of materials.	Budget overspend, reduced profits, failure of business	Alex Morris	4	4	21	VCR Process, monthly management meetings, procurement when orders are placed with sub contractors in comparison to internal staff, productivity of the operatives, purchasing deals of materials	2	3	9	2	3	9		Monthly
Operational Performance	OPERATIONS DEPARTMENT (Repairs and Maintenance)	Workforce skills	If we do not have a workforce with the correct skillsets, then we may not be able to meet contract requirements	HTS Workforce needs to have appropriate training, knowledge and skills to undertake work safely and to a high standard.	Lack of training, sickness absence, age profile, recruitment issues, demand led business. Union action. Pay conditions. Quality of work. Demand of work	Unable to provide services within timescales, reputational damage, no service, poor service, failure to meet KPI's, complaints, damage/injury caused by workforce and increased damage due to delays in works. Increased costs, due to obtaining agency workers to backfill, liability insurance claims. Increased incidents and accidents including motor accidents. Union demands/strikes. Performance monitoring issues (KPIs). Work performance issues. Demand for work force (increase/decrease)	Steve Ward	4	4	21	Sickness absence policy, recruitment policy, occ health policy, access to agencies, training programme, health days. Senior Management Team Meetings	4	3	17	4	3	17	Apprenticeships, work placements, up skilling, multi skilling, internal promotions	Monthly
Operational Performance	OPERATIONS DEPARTMENT (Repairs and Maintenance)	Repairs System	If the repairs system is not reliable, then repairs and maintenance work will not be managed efficiently	Efficient repairs and maintenance workflow relies on reliable and accessible logging and reporting of jobs including completion of work together with an auditable trail. HTS relies on an external system provider for its repairs and maintenance system.	Size of provider, reliability of system/system owners, cloud hosted system, reliance on single internal employee, interface between orchard and callsys (both systems to be updated). No notification of right to buy/change of tenancy to update system and send comms to correct tenant (E.g. Gas checks)	Disruption to service, inefficient management of jobs, communication issues	Steve Ward	3	4	18	Callsys (Housing management system) provides auditable trail and interfaces with orchard and used to pay sub contractors and ordering materials through it (job costs are tracked)	3	3	13	3	3	13	Review supplier	Annual
Operational Performance	HR, PAYROLL AND COMMUNICATIONS DEPARTMENT	Workforce Management	If HTS fail to properly manage its employees, then service delivery could be jeopardised	Active management of communications and policies by HR is required to ensure an engaged workforce	New department (inexperience of the team), current policies and procedures in line with statutory requirements, communication issues, culture.	Tribunals, stress, grievance, disciplinarys, increased sickness, resource planning, poor service delivery, budgetary control (agency), increased costs, industrial relations, employee relations, reputational damage	Tim Page	4	3	17	Robust policies and procedures, balance score card, in house management (monitoring and reporting), JPRM Reports, SMT meetings, union meetings/JNCC (joint negotiation committee), staff briefings, training, tool box talks, 1-2-1's, open door policy, newsletters	3	2	8	3	2	8	Workshops, sickness absence management, enforcement of policies, education of line management to provide confidence and ownership and support of senior management, staff engagement.	Monthly
Operational Performance	HR, PAYROLL AND COMMUNICATIONS DEPARTMENT	Payroll Processing	If payroll is not processed correctly, then staff may suffer due to incorrect or late payments	Correct processing of employee payroll and associated information in a timely manner to meet deadlines. Providing correct annual returns to revenue and customs and to Essex Pension Fund.	Collection of data, new department (inexperience of the team), inhouse payroll, internal and external agencies, IT system (Sage), reliance on individuals, human error, timescales (pay schedule).	Staff not being paid, stress, incorrect amounts being paid, hardship, wrong FPS, disengaged workforce, poor performance, industrial action.	Tim Page	3	3	13	Back up of system (Sage), set cut of date each month to give adequate time for data input, forms and policies in place for recruitment and changes, director sign off (authorised signatory), monthly checks and balances (edit checks), post payroll resolution deadlines, advanced payments and adjustments	2	2	5	2	2	5	Formal training of staff, succession planning, multiskilling, remote access if required, back up off site	Monthly

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Culture	HR, PAYROLL AND COMMUNICATIONS DEPARTMENT	Communications	If HTS does not adequately communicate with stakeholders, the business may suffer through poor perception of HTS.	HTS should keep its workforce and other stakeholders within the Council and externally informed and engaged through positive and pro-active communications	Misinformation, communications, new department, plaudits and complaints, social media (twitter, linked in), website, political change	Disengaged work force, poor performance, unclear messages, bad publicity, providing incorrect information, reputation, employee assumptions, information overload, peoples (internal and external) perceptions, culture, politics (internal and external)	Tim Page	4	4	21	JPRM, Newsletters, staff briefings, notice boards, emails, texts, award ceremony, SSC, tenant and leaseholder engagement meetings and forums, on site visits, web development, toolbox talks, open door policy, portfolio 1-2-1 sessions, CSR, donations, satisfaction surveys to members of the public, Disability confident employer, living wage employer, accreditation advertising.	3	4	18	3	4	18	Satisfaction surveys to be communicated by email/text for more engagement, new website, SMB and SMT from Harlow Council and HTS to communicate the same message.	Monthly
Compliance	SAFETY, HEALTH, ENVIRONMENTAL & COMPLIANCE DEPARTMENT	Safe Working	If HTS does not have adequate safety processes, then employees and the general public may be at risk	HTS should have robust safe working procedures to prevent incidents occurring and defined emergency arrangements in place if something goes wrong (accidents, gas leak, environmental impact or BC)	Works involving members of the public, agency workers, subcontractors, staff, using equipment, trades and services (can include hot works), materials and plant.	Accidents and Incidents, RIDDORS, RTA's, environmental spillage, enforcing authority (HSE, EA, Police, Fire, Environmental Health investigations), reputational, bad publicity, loss of work, staff morale, loss of staff	Stella Dunlop	4	5	24	Management system, all staff training, regular updates, new starter inductions, toolbox talks, audits (internal and external), weekly and monthly inspections, policies and procedures, accreditations, ISO, gas safe, NICEIC, monitoring and reporting, SMT meetings, monthly SHEC meetings, communication controls mentioned above, risk assessments, sub contractor approval and monitoring (i.e. subcontractors are constructionline approved)	3	3	13	3	3	13	Updating and monitoring the systems and also reviewing and changing the systems as required.	Monthly
Compliance	SAFETY, HEALTH, ENVIRONMENTAL & COMPLIANCE DEPARTMENT	Depot working environment	If a safe working environment is not established at the depot, then incidents and accidents could occur.	HTS must manage the depot and use of the building to provide a secure and safe working environment.	Lifts, gas, electrical, water, fire, hazardous materials, security, plant and equipment, vehicle movement, air conditioning, ventilation, welfare, working environment, lone workers. Three depots are Mead Park, Wych Elm and Staple Tye.	Accidents and Incidents, RIDDORS, RTA's, environmental spillage, enforcing authority (HSE, EA, Police, Fire, Environmental Health investigations), reputational, bad publicity, loss of work, staff morale, loss of staff, staff safety, BC	Penny Phillips	3	4	18	Premises register, log shows due dates, onsite security, SHEC management system, reporting process, regular inspections and audits, lone worker out of hours system at Mead Park. Adequate insurance cover in place across all lines of business.	2	3	8	2	3	8	BC plan to be tested and rolled out	Monthly
Compliance	SAFETY, HEALTH, ENVIRONMENTAL & COMPLIANCE DEPARTMENT	Hazardous Substances Handling	If chemicals, substances and asbestos is not handled safely, then employees and the general public may be at risk	When handling hazardous substances it is necessary to ensure that spills and hazards to staff and members of the public are prevented	Working on properties, asbestos removal, asbestos testing, use of chemicals and materials, clearance of properties and dumped rubbish including hazardous waste.	contamination, exposure, incidents and accidents, industrial disease, enforcing authority, BC, reputation and fines, prosecution, bad publicity, endangerment of the public and staff.	Stella Dunlop	4	4	21	SHEC Assessments, policies and precures, SHEC management system, asbestos register, client information, correct equipment, PPE, training, toolbox talks, approved contractors to test and remove asbestos (2 separate companies used).	2	3	9	2	3	9	Ensure client system is regularly updated, working more closely with the client undertaking joint inspections.	Monthly
Operational Performance	OPERATIONS DEPARTMENT (Environment/Cleansing)	Plant and Equipment Replacement	If we fail to maintain and invest in plant and equipment, then we will be unable to deliver frontline services effectively	HTS now lease 7 sweepers to carry out existing service. These need to be maintained, serviced and replaced at end of 5 year lifespan	lack of maintenance , failure of lease company to attend and repair breakdowns in timely fashion, unexpected accidents and mechanical incidents, poor road infrastructure	will lead to breakdowns and downtime. Failure of KPIs, financial penalties, bad publicity, increased costs, road defects lead to damage to vehicles. Restrictions or Loss of Operator licence	Mick Jenkins	4	4	21	Regular maintenance as per manufacturers guidelines, contract with vehicle supplier for maintenance. Spare vehicles supplied by vehicle supplier if vehicle is down for a long period. Driver awareness training, tracking system to monitor driving habits, regular monitoring, driver 'ownership', brushes held in stock to reeduce downtime.	2	3	8	2	3	8	monitor performance and downtime of vehicles as they get older	Monthly
Operational Performance	OPERATIONS DEPARTMENT (Environment/Parks & Landscapes)	Landscapes Works	If landscape works are not carried out to correct locations, required timescales and specification and in a safe and considerate manner then HTS is at risk of claims for potential damages to HDC for failure of KPI's and personal insurance claims from third parties	HTS is required to carry out landscaping works to the requirements of the Output Specification and KPI's. Current mapping information is crude and inefficient, carried over to HTS from the encumbent contractor.	Out of date manual maps held by HTS. Manual maps not always taken out on site by operatives. Reliance on key personnel for local landscape area knowledge. Accidental damage to property from flying stones or debris due to the use of rotary cutting machinery such as flails, tractors and mowers working close to vehicles and the public.	HTS operatives may potentially carry out works to areas not owned by HDC causing damage to third party property leading to reputational damage. Claims for accidental damage to third party assets or personal injury due to type of machinery used.	Mick Jenkins	4	3	17	Maps are held on phones as PDF's when required. Changes in areas are captured via Change Notices and volume drivers with HDC. Agency workers closely monitored by supervisors. Performance measured and reviewed quarterly at JPRM and SSC.SHEC Management System, safe working procedures, staff training including LANTRA where required, re new starter inductions, toolbox talks, audits (internal and external), weekly and monthly inspections, policies and procedures.	4	2	12	4	2	12	Report produced by HDC at April 2018 JPRM detailing pilot programme to map street gullies and plan to update existing data. Update sent to JPRM in October 2018 detailing positive results of initial 3 month trial. Follow through with recommendations made by HDC to update online mapping of landscape areas.	Monthly

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Operational Performance	OPERATIONS DEPARTMENT (Environment/Transport)	Vehicles and Plant Servicing	If we fail to provide adequate maintenance and repair to our vehicles and plant or replace, then we will not be able to deliver contracted services	The HTS fleet needs to be properly maintained and vehicles regularly replaced to ensure continuation of contracted service delivery	no plan to replace old vehicles, lack of funds to replace and/or maintain fleet, lack of qualified mechanics	mot failures, increased maintenance costs and hire costs, service delivery issues, failure of KPI, downtime of operatives, more breakdowns and accidents due to mechanical faults	Mick Jenkins	4	4	21	Apprenticeship scheme, planned maintenance, regular inspections, audit trail of inspections, monitoring of vehicle accidents, MOT pre-inspections, planned replacements	2	2	5	3	3	13	Agree method of leasing or purchasing new vehicles and available funding (report to HTS Board to be ratified) and implement	Monthly
Operational Performance	OPERATIONS DEPARTMENT (Environment/Cleansing)	Operatives and driving	If operatives do not take care, then there may be more accidents leading to damage or injury	If operatives are not skilled or become complacent or lose concentration whilst driving, it will lead to greater levels of accidents and damage	lack of qualified drivers, age of workforce, skills, inability to replace workforce	service delivery, higher than average amounts of minor damage, increased downtime, reduced productivity, failure of KPIs, increased costs	Mick Jenkins	4	3	18	Driver training and awareness, toolbox talks, regular monitoring of driving styles and habits, succession planning	2	2	5	2	2	5	driver incentives, drug and alcohol testing for drivers	Monthly
Compliance	OPERATIONS DEPARTMENT (Environment/Waste Transfer Station)	Environmental Impact	If we do not manage environment and waste transfer station adequately, then we may have waste escaping the boundaries	HTS collects waste and transports it to Mead Park depot for waste transfer and further treatment and disposal. The operation needs to be handled with care and within licencing (EA) guidelines.	loss of waste management licence, repeated failures of terms and conditions of licence	loss of EA licence, fines, reputation, environmental impact, increased costs due to having to use external waste disposal facilities, unable to segregate and recycle waste	Mick Jenkins	4	4	21	qualified staff, regular audits, waste management plan regular review/update, regular EA visits, toolbox talks, environmental updates, site inductions for users	2	4	14	2	4	14	keep up to date with legislation, ensure up to date competency certification, review as part of SHEC.	Monthly