

	REPORT TO CABINET TO BE HELD ON 16 JUNE 2015	
	Key Decision	NO
Corporate Priority Aim 3 – Creating Healthy and Vibrant Communities	Forward Plan Ref No	PPH7
	Cabinet Portfolio Holder	Cllr B Chatt Cabinet Member for Public Health and Housing

REPORT OF: DIRECTOR OF SERVICE DELIVERY 15/148

WARDS AFFECTED: ALL

**SUBJECT: SELECTIVE LICENSING OF PRIVATE RENTED
ACCOMMODATION**

RECOMMENDATION (S):

Cabinet is recommended to:

- 1) Note changes being introduced by Government regarding the criteria that Local Authorities must consider in order to introduce Selective Licensing of private rented accommodation.
- 2) Note that officers will be looking again at the business case for Selective Licensing in parts of the Borough that have high levels of private rented accommodation and that experience poor housing conditions, high levels of deprivation and persistent problems with crime and anti-social behaviour and will report back to Cabinet on completion of this exercise.

REASON FOR RECOMMENDATION

To ensure that the Council is taking forward alternative preventative strategies to properly regulate private rented accommodation in order to complement and support its wider strategy to regenerate the Borough.

HIGHLIGHTED RISKS:

None at this time. This report seeks approval to work up a business case for further consideration and does not commit the Council to any course of action.

1. INTRODUCTION

- 1.1 This report provides Cabinet with an overview of the provisions within the Housing Act 2004 that allow Local Authorities to introduce Selective Licensing of private rented accommodation. The report seeks agreement to look at the business case for Selective Licensing in pockets of the Borough that have high levels of private rented accommodation, poor housing conditions and that suffer from high levels of deprivation and crime and anti-social behaviour.
- 1.2 Cabinet has previously considered this issue in July 2012 (report ref 12/340). At that time, whilst a scheme for the Additional Licensing of Houses of Multiple Occupation was agreed by Cabinet for parts of the Castle, North Bay and Ramshill Wards, Selective Licensing was not taken forward. It was however agreed that officers would keep this issue under review as part of the Council's Housing Strategy.
- 1.3 In March 2015 the Housing Minister, Brandon Lewis wrote to all Local Authorities to outline some key changes to the regulations regarding Selective Licensing. These changes have key implications as they both broaden the range of issues that Councils should take into account when considering Selective Licensing and also restrict the number of properties that can be licensed without Secretary of State approval. These changes are highlighted within the report.

2. CORPORATE AIMS/PRIORITIES AND THE COMMUNITY PLAN

- 2.1 Contributes to Aim 3 of the Council's Corporate Plan, 'Creating Healthy and Vibrant Communities'.

3. BACKGROUND AND ISSUES

- 3.1 The Housing Act 2004 allows Local Authorities to introduce Selective Licensing of private rented accommodation. Local Authorities have been able to designate their entire district, or an area within a district, subject to the proposed area meeting one or more of the following conditions:
 - The area is one which is experiencing (or is likely to experience) low housing demand and the local housing authority is satisfied that 'designating' an area will, when combined with other measures, lead to improved social and economic conditions in the area.
 - The area is experiencing a "significant and persistent" problem caused by anti-social behaviour and that some or all private landlords in that area are not taking appropriate action to tackle this. Moreover, the designation in combination with other measures would lead to a reduction in or elimination of the problem.

- 3.2 Before making a decision to designate an area for Selective Licensing an Authority must consider whether there are alternative means of addressing the issues, for example, through the introduction of a voluntary accreditation scheme for landlords. It must also ensure that any proposed licensing scheme fits with its overall housing strategy and policies on homelessness and empty dwellings.
- 3.3 Authorities have discretion to set the precise conditions of the licence. These can include conditions relating to the use and occupation of the house, and measures to deal with anti-social behaviour of the actual tenants or those visiting the property. They also typically include conditions around the provision of basic amenities and basic standards regarding the physical condition of property.
- 3.4 There are also certain mandatory conditions which must be included in a licence. For example, licensees are required to:
- Present gas safety certificates annually to the Council
 - Keep electrical appliances and furniture in a safe condition;
 - Keep smoke alarms in proper working order;
 - Give tenants a written statement of the terms of occupation; and
 - Demand references from prospective tenants.
- 3.5 In deciding whether or not to grant a licence the Authority must consider whether the landlord (or the managing agent) is a 'fit and proper' person. This means the Authority must have regard to any previous convictions relating to violence, sexual offences, drugs or fraud; whether the proposed licence holder has contravened any laws relating to housing or landlord and tenant issues; and whether the person has been found guilty of unlawful discrimination practices.
- 3.6 As is the case with the granting of licences for HMOs, if the Authority determines that the landlord is not 'fit and proper', it can refuse to grant a licence. The Local Authority can also withdraw a licence after issue if the licensee is no longer considered a 'fit and proper' person.
- 3.7 If an Authority believes that a landlord has breached licence conditions they can issue a fine of up to £5,000 for each offence. Operating a property without a licence in a designated area can attract a fine of up to £20,000. In addition the act allows Authorities to step in and take over the management of property where conditions are being breached. These powers complement existing enforcement measures used by authorities such as the use of Improvement and Prohibition Notices.

- 3.8 As with the HMO licensing regime, landlords must pay a charge for a licence issued under a Selective Licensing scheme. Authorities can set the level of the fee, the intention is that the rate should be 'transparent' and should cover the actual cost of the scheme's administration. Fees are typically in the region of £1000 for a block of multi-occupied homes and £600 for a single property. The licence lasts for 5 years.
- 3.9 Fees cannot be used by the Local Authority as a method of generating additional revenue or be used to help offset the cost of core funded activity. Fee income can only be used to pay for the actual cost of the schemes administration. Fee income cannot be used to cover the cost of enforcement activity.
- 4.0 Some properties are exempt from licensing, these include HMOs already licensed under a mandatory or additional licensing scheme and property owned and managed by Registered Providers (housing associations).
- 4.1 Typically Local Authorities offer discounts to landlords who own lots of properties. Discounts are also generally offered to landlords who are 'accredited' by the Council.
- 4.2 Licensing designation lasts for 5 years, the theory being that within this period the regime will help uplift standards of management within the area. Schemes should be kept under review and would require further designation if an extension period was required.
- 4.3 Initially Local Authorities were required to apply to the Secretary of State in order have an area designated for Selective Licensing, however in 2010 a general consent order was introduced that allowed Local Authorities to make their own designations (subject to certain criteria being met) without Secretary of State approval.
- 4.4 On 11 March 2015 the Housing Minister, Brandon Lewis, wrote to all local authorities in England to advise that, from 1 April, *"local authorities will have to seek confirmation from the Secretary of State for any selective licensing scheme which would cover more than 20% of their geographical area or would affect more than 20% of privately rented homes in the local authority area."*
- 4.5 In addition to amendments to the General Approval the Government intends to expand the criteria for selective licensing to cover areas experiencing *"poor property conditions, large amounts of inward migration, a high level of deprivation or high levels of crime."*

5.0 ASSESSMENT

5.1 A large number of Local Authorities have introduced Selective Licensing schemes as part of their wider strategies to regenerate and uplift areas. For example, Selective Licensing has been introduced in parts of Blackpool see:

<https://www.blackpool.gov.uk/Business/Licensing-and-permits/Housing-licences/Selective-licensing/South-Beach-selective-licensing.aspx>

5.2 A variety of studies have been undertaken to evaluate the impact of Selective Licensing schemes including an *Evaluation of the impact of HMO and Selective Licensing*. Building Research Establishment 2010

5.3 Key findings from that evaluation were that:

- Larger than average increases in house prices occur in areas where a Selective Licensing scheme operates
- It helps to safeguard investment in regeneration by dissuading the purchase of property by short term investors with little interest in providing decent homes for people in the local community.
- There are indications that standards of management improve and that landlords are compelled to 'raise their game'.
- It helps to control anti-social behaviour. Landlords are compelled to provide written tenancy agreements together with tenant referencing and vetting.
- Licensing works best when effective joint working arrangements within Councils and between agencies are in place.
- Schemes are most effective where detailed property inspections are undertaken before awarding a licence and where the enforcement of standards is dealt with robustly.
- There is little evidence from the research that licensing simply displaces problems into neighbouring areas.

5.4 However not all the findings from the evaluation were positive. The researchers also noted that:

- Some of the Councils studied had seriously underestimated the level of resources required to run effective schemes. Schemes were not fully self-financing and much more resource intensive than originally envisaged. To be effective licensing requires the Authority to provide a number of linked services like landlord advice and accreditation to ensure that the overall approach provides the right balance between sanctions and incentives.
- Licensing amongst landlords is highly unpopular. Landlords typically are critical of the consultation process and often cynical and suspicious as to the real motives for licensing.

- Landlords, tenants and residents are very critical of authorities who were not carrying out full inspections as part of the licensing process as this meant that sub-standard properties were still being allowed to operate in some areas.
- 5.5 The Council has previously considered the pros and cons of Selective Licensing. In July 2012 Cabinet considered report 12/340. That report looked at the case for both Selective Licensing and the Additional Licensing of HMOs within the Borough. The case for Selective Licensing was considered for a number of Super Output Areas (SOAs) that experienced higher than average concentrations of private rented accommodation. These included parts of the Castle, North Bay, Ramshill and Whitby West Cliff Wards.
- 5.6 At that time a scheme for the Additional Licensing of HMOs was agreed by Cabinet for parts of the Castle, North Bay and Ramshill Wards, however. Selective Licensing was not taken forward. This was because that whilst it was clear that parts of the Castle and North Bay wards do indeed experience higher than average levels of crime and anti-social behaviour (based on index of multiple deprivation rankings and local crime/ASB statistics), overall these areas did not quite fit with the wider criteria for designation (e.g. market failure/low demand housing). This made the case and justification for a scheme less valid and the threat of challenge against any potential designation more likely. In addition, at that time resourcing and partnership working to support any such scheme would have been more problematic because emerging new partnership arrangements (via the multi-agency arrangements with the Police and Fire Service) were in their infancy. Also at that time the HMO licensing issue was very much the priority. As such licensing was not recommended, however officers did agree to keep the case for it under review as part of the Councils overall housing strategy.
- 5.7 The announcement regarding changes to the criteria for designation and the inclusion of deprivation, poor housing conditions and migration levels does however re-open the potential case for Selective Licensing in some parts of the Borough.
- 5.8 Information collated from the 2011 Census, the Index of Multiple Deprivation (IMD) and the Councils own records regarding enforcement interventions does appear to show a correlation between high levels of private rented accommodation, migration, deprivation, poor housing conditions and levels of crime and anti-social behaviour within the Borough.
- 5.9 The areas within the Borough with by far the highest concentrations of privately rented accommodation are the urban Scarborough wards of Castle, North Bay and Ramshill. The IMD splits these wards into Super Output Areas (SOAs) and ranks them in terms of levels of deprivation. The SOAs within these Wards with the highest levels of rented accommodation are **North Bay: 006D, Castle: 0010A & 006B** and **Ramshill: 0010B and 0010D**. A map outlining the boundaries of these SOAs can be found in **Appendix A**.

6.0 A table showing key data regarding these areas can be found in **Appendix B**. Census and IMD data shows that:

- The population within these areas is growing at a much faster rate than the rest of the Borough. Overall the population within these areas increased by 17.8% between 2001 and 2011. This rate of increase is significantly higher than the rest of the Borough over the same period (2.4%) and for the rest of the country (7.9%). The population within Castle: 006B and North Bay: 006D increased by over 25% over the 10 year period.
- Much of this increase is due to inward migration from non-British migrant workers and BME groups. From 2011, the overall population within these five SOAs increased by 1255, of which 969 class themselves as coming from White non-British or other BME groups. This accounts for 77% of the population increase in the area.
- The level of private rented accommodation within these areas is significantly higher than the Borough or national average. For example 57.6% of all accommodation within North Bay 006D is privately rented, 61.3% and 50.5% in the Castle SOAs 0010A and 006B is privately rented. This compares to a Borough average of around 19.5%.
- Over a ten year period between the 2001 census and the 2011 census there was a marked growth in the overall level of private rented accommodation within these areas.
- These areas continue to rank poorly in terms of their overall levels of deprivation. The IMD ranking for these areas shows that North Bay: 006D, is amongst the bottom 3% of all SOAs nationally, Castle: 006B the bottom 2%, Castle 0010A the bottom 12%. The Ramshill SOAs 0010B and 0010D fall into the bottom 15% and 25% respectively.
- The North Bay and Castle SOAs also rank poorly in terms of crime rankings. North Bay 006D falls within the bottom 12% nationally, Castle :006B and 0010A the bottom 4% and 12% respectively (it is important to note that these figures for 0010A are of course affected by the night time economy).
- The Ramshill SOAs do however experience less crime overall, with 0010B falling within the bottom 40% and 0010D the bottom 35%.

6.1 Not surprisingly, data collated from the Council's own housing enforcement records shows that it is these areas that require the highest level of intervention to tackle complaints about poor housing conditions or poor management standards from landlords. For example between 2013/15 the Council responded to complaints in respect of 109 different privately rented properties (or multi-occupied properties) within the North Bay SOA 006D. Interventions were similarly high for the Castle and Ramshill areas.

6.2 Most typically these interventions related to complaints regarding excess cold and damp, a lack of adequate heating and insulation, poor management standards, poor maintenance of the communal areas, a lack of fire safety provisions and general disrepair issues.

- 6.3 There would appear to be a correlation between levels of private sector housing, housing conditions and levels of deprivation. High concentrations of economically inactive people living in a relatively small area contribute toward the overall spiral of deprivation. Within the Castle Ward for example, 31.6% of the working age population was in receipt of income related benefits compared to 16.6% across the whole Borough and 14.7% nationally (NOMIS, Official Labour Market Statistics). This concentration of economically inactive people in this area is likely to be supported by high concentrations of relatively cheap and accessible private rented accommodation. The private rented sector provides a 'surrogate' form of affordable housing for people who would otherwise struggle to access the housing market.
- 6.4 The figures highlighted within this report are very much a desk top appraisal to demonstrate the potential need for Selective Licensing. The business case to consider this issue in more detail will look at similar indices for the whole Borough and draw from a wider range of sources. In addition if a scheme for the North Bay, Castle and Ramshill areas was to be recommended then the boundaries for such a designation are likely to be more sophisticated and where possible try and look at street level data. It is also important to note that if all five SOAs highlighted within this report were included within a Selective Licensing area then this would push the total number of homes over the 20% threshold requiring Secretary of State approval. A more refined approach to designating potential area boundaries would probably be needed.
- 6.5 Within the areas highlighted the scale of deprivation, crime and anti-social behaviour and poor housing conditions does appear to demonstrate that there is a potential case to introduce a scheme for Selective Licensing as part of a wider strategy to support improvement. Indeed the levels of deprivation and poor housing conditions within these areas should not be underestimated and are very much at odds with the Council's wider aspirations for the economic regeneration of Borough. Selective Licensing along with a robust and co-ordinated approach to enforcement could be a very effective way of improving conditions, encouraging inward investment and driving up standards.
- 6.6 Selective Licensing would require landlords and their agents to be better equipped to deal with the management of properties and the enforcement of tenancy conditions. The scheme could place much more emphasis on the adoption of a proactive, partnership approach between landlords and statutory agencies to effectively tackle anti-social behaviour. It is interesting to note for example that Blackpool Council use fee income to pay for an anti-social behaviour co-ordinator to work with landlords to tackle problem tenants.
- 6.7 Such as scheme could also enable issues to be dealt with in a more planned and preventative way, providing an opportunity for a proactive approach that will reduce the potential for landlord and tenant conflict by pre-empting problems such as disrepair before they escalate and require other forms of Council intervention. This shift to a more proactive and preventative approach cannot be achieved through the use of existing responsive enforcement powers or through the use of discretionary and voluntary accreditation schemes.

- 6.8 The existing schemes to license HMOs, whilst very important, only covers a small proportion of the total number of private sector dwellings. Within the Castle, North Bay and Ramshill areas only 89 HMOs in total are required to operate with a license out of over 2500 private rented dwellings in total.
- 6.9 The introduction of such a scheme could not however be undertaken lightly. There are some significant potential implications for the Council. These implications are covered briefly within this report and would be covered in some detail as part of the business case.
- 7.0 The biggest implication of any such scheme is resourcing. The Council does not have the capacity to effectively introduce a scheme without additional resources. Any effective scheme would require a programme of inspection as part of the licensing application process along with an on-going programme of routine inspections throughout the licence period. Services such as landlord support and advice would need to be bolstered. Additional staff would therefore be required, the cost for which would need to be met via fee income. The number of additional staff required and the level of fee income levied would of course vary and depend on the scale and scope of any future scheme.
- 7.1 It is important to stress that if a scheme was to be introduced in a meaningful way and if it was to meet its intended goal of improving housing conditions and management standards, then it would certainly result in increased levels of enforcement activity in the short term. The cost of any additional enforcement activity cannot be paid for via fee income and would need to be met using existing resources.
- 7.2 The staffing and capacity implications of a scheme shall therefore be carefully considered as part of the business case however it is worth noting from the outset that the successful introduction of such a scheme is likely to require some changes to the roles of responsibilities of some staff along with potential structural changes within and between different enforcement functions of the Council (housing, planning, environmental protection, waste management and community safety). At the very least common and shared goals would be required between staff and teams to ensure its successful operation. The effective operation of such a scheme and an increase in civil and criminal enforcement activity, such as prosecutions would inevitably have implications for the Council's legal services team, creating additional workload, the implications of which would need to be carefully considered.
- 7.3 Key to the effectiveness of any such proposal would be the need for close and integrated partnership working between the Council and the Police and the Fire and Rescue Service. Cabinet will recall that in June 2013 Cabinet considered report 13/205. That report gave approval for the creation of a co-located, multi-agency team to work in partnership to help uplift the Castle and North Bay areas. A key focus of that team is to shift resources away from responding to problems as they arise to dealing with issues in a planned and proactive way, using a joint problem solving approach. One of the key aims of

the team is to improve the physical appearance of the area and the quality of the housing in the area, in particular to encourage effective management of properties, in recognition of the correlation between poor quality housing and wider issues such as deprivation and crime.

- 7.4 This team has now been operational for some months and consists of a partnership between the Council's Community Safety, Environmental Health/Housing staff, the Police, the Fire Service and Yorkshire Coast Homes. An external evaluation of the work of this team is due to be undertaken this summer. However, the approach is already evolving and expanding, with core partners seeing the benefits of the multi-agency approach in dealing with a range of complex and interrelated issues and as an effective way of delivering core services
- 7.5 Since its inception the team has expanded, both in terms of staff and in its coverage of the Borough, with the multi-agency problem solving approach rolled out to Eastfield, Barrowcliff and Whitby, as well as being used successfully to affect the closure order for the Breece Hotel. The entire Safer Neighbourhoods Policing Team for the central area are now co-located with the team, embedding the partnership approach as a normal way of delivering neighbourhood policing services.
- 7.6 Initial discussions with key partners including the Police, Fire and Rescue Service, Public Health, Scarborough and Ryedale Clinical Commissioning Group and Yorkshire Coast Homes regarding the need for and merits of this potential proposal have been positive. The concept of Selective Licensing and the potential benefits it could bring has been endorsed by the Public Service Executive who have given their in principle support to the idea.
- 7.7 Selective Licensing could be a powerful tool to support the physical and economic regeneration of the Borough. However it is not something to be entered into lightly. It is therefore being recommended that a business case is worked up for consideration by Cabinet. This case would consider.
- The case for Selective Licensing (drawing upon a broader range of indices including where possible street level data).
 - The areas that could be covered (e.g. a more refined approach than the SOAs highlighted).
 - The nature of such a scheme (e.g. what it would cover, what the policy would include).
 - The resource implications (including staffing implications).
 - The role with the co-located team in supporting delivery
 - The potential fee structure.
- 7.8 The development of this business case shall coincide with wider work being undertaken to evaluate the impact of the co-located team. Should Cabinet decide to proceed with such a scheme to the next stage, then a detailed process of public consultation would need to be undertaken. The outcomes of which would inform the final decision as to whether to proceed or not and help shape the final design of any potential scheme.

8.0 IMPLICATIONS

8.1 Policy

There are no new policy implications for the Council that arise from this report at this time.

However should the Council decide to introduce a scheme for the Selective Licensing of private rented accommodation at a later date then this would require an agreed policy to be worked up and approved.

Key elements of any potential policy along with an assessment of the pros and cons of such an approach shall be considered as part of the future business case.

8.2 Financial

There are no financial implications for the Council that arise from this report at this time. However should the Council decide to introduce Selective Licensing then this would have some key financial implications for the Council. These implications shall be considered fully as part of the business case.

The costs of administering Selective Licensing would need to be recouped through an administration fee levied to landlords. Fees typically are in the region of £600 per individual property and up to £1000 for a 'block' of properties. Councils typically offer a range of discounts and incentives within any given scheme.

Fee income charged would need to be at a sufficient level to pay for additional staffing costs of administering such a scheme and would of course vary depending on the scale of any proposal.

It is also important to note that costs associated with enforcement activity cannot be recouped through licence fees.

8.3 Legal

The Housing Act 2004 enables Local Authorities to introduce selective licensing in certain circumstances.

Should the Council on consideration of a business case decide to pursue a Selective Licensing scheme then there are various steps that it would need to take including a full and comprehensive consultation and the issuing of a public notice of designation.

8.4 Equalities and Diversity

No implications at this time.

8.5 Staffing Issues

No implications at this time. However the introduction of selective licensing would have some key staffing implications should it be taken forward.

The Council does not have the capacity to take forward such a proposal with existing staffing resources. Additional staff would be required to administer the scheme (the number of officers would of course vary depending on the scale of any proposal). The additional cost associated with extra staff should theoretically be covered via fee income.

It is also very important to note that any effective scheme for selective licensing is likely to generate a significant level of additional enforcement activity for the Council, however the cost of this additional activity cannot be met via fee income.

The staffing/capacity implications of a scheme shall therefore be carefully considered as part of the business case however it is worth noting from the outset that the successful introduction of such a scheme is likely to require some changes to the roles of responsibilities of some staff along with potential structural changes within and between different enforcement teams.

The capacity of the Council's ability to provide corporate legal support will also be considered along with options around the use of 'interim management orders' (which again the Council no-longer has the capacity to take forward given the transfer of its housing management staffing/ infrastructure to Yorkshire Coast Homes.)

In addition any scheme would require strong partnership arrangements with other agencies (the Police and Fire Service) for it to be successful. The working arrangements of the co-located team would need to be embedded into the Council's core operational arrangements.

8.6 **Planning, Environmental, Health and Safety, Sustainability, Crime and Disorder**

No implications at this time, however the need for and potential benefits of selective licensing in terms of its impact of crime and disorder shall be considered as part of the business case.



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Background Papers: None

IF YOU HAVE ANY QUERIES ABOUT THIS REPORT OR WISH TO INSPECT ANY OF THE BACKGROUND PAPERS, PLEASE CONTACT ANDREW ROWE ON 01723 383598 OR E-MAIL andrew.rowe@scarborough.gov.uk

Appendix B

	Households	Number of households living in privately rented property.	IMD Rank (overall)	IMD Rank (crime)	PRS Housing Complaints/Enforcement Interventions (by property) 13/15
North Bay 6d	996	574 (57.6%)	885 (bottom 3%)	3781 (bottom 12%)	109 properties
Castle 6b	928	469 (50.5%)	389 (bottom 2%)	1115 (bottom 4%)	72 properties
Castle 10A	847	519 (61.3%)	2469 (bottom 8%)	3591 (bottom 12%)	70 properties
Ramshill -10B	899	544 (60.5%)	4969 (bottom 15%)	12824 (bottom 40%)	75 properties
Ramshill – 10D	857	477 (55.6%)	7516 (bottom 25%)	10400 (bottom 35%)	71 properties

Note

The IMD Rank Overall is a composite figure from the 2010 English Indices of Deprivation. This looks at 7 indices of deprivation (Income, Employment, Health and Disability, Education Skills and Training, Housing and Other Services, Crime and Living Environment)

More information on IMD rankings can be found at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6871/1871208.pdf

Risk Ref	Date	Risk	Consequences	Mitigation	Current Risk Score	Target Score	Service Unit Manager/ Responsible Officer	Action Plan
1	June 2015	The Council works up a business case for selective licensing that is not subsequently taken forward.	Some waste work	Adoption of the new action plan.	A1	A1	Housing Manager	

Glossary of Terms

Risk	An event which may prevent the Council achieving its objectives
Consequences	The outcome if the risk materialised
Mitigation	The processes and procedures that are in place to reduce the risk
Current Risk Score	The likelihood and impact score with the current mitigation measures in place
Corporate Objectives	An assessment of the Corporate Objectives that are affected by the risk identified.
Target Risk Score	The likelihood and impact score that the Council is aiming to achieve
Service Unit Manager	The Service Unit or Officer responsible for managing the risk
Action Plan	The proposed actions to be implemented in order to reduce the risk to the target score

Risk Scoring

Impact	5					
	4					
	3					
	2					
	1					
		A	B	C	D	E
	Likelihood					

Likelihood:

A = Very Low
 B = Not Likely
 C = Likely
 D = Very Likely
 E = Almost Certain

Impact:

1 = Low
 2 = Minor
 3 = Medium
 4 = Major
 5 = Disaster