

**EXTENDING THE SHARED HOME IMPROVEMENT AGENCY
SERVICE (CAMBS HIA)**



BUSINESS CASE

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Owner: Cambs HIA Board

Client: HIA partnership (Cambridge City, S Cambridge shire & Huntingdonshire plus East Cambridgeshire councils)

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** S = SIGN-OFF, R = REVIEW, I = Information*

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1. Introduction

Cambridgeshire Home Improvement Agency (Cambs HIA) was set up as a shared service in 2012. The agency works with older people and others who need support to adapt and repair their homes. The main client group are people who own or privately rent their homes.

This Business Case sets out:

- The background to the establishment of the HIA and the needs and purposes of this proposal
- The case for extending the existing shared service for a further three year period
- Considerations of financial impact, service quality and a risk assessment associated with expanding the shared service to include East Cambridgeshire alongside Cambridge City, Huntingdonshire and South Cambridgeshire.

2. Background to Cambs HIA

Legislative and Strategic Context

The HIA service enables the partner councils to meet statutory duties under the Housing Grants, Construction and Regeneration Act 1996 to award Disabled Facilities Grants (DFG) assisting vulnerable people carry out essential adaptations subject to qualifying conditions. The HIA service also assists people to maintain, repair and improve their homes to make them safe and suitable. Discretionary Repairs Assistance Grants or loans help owner occupiers and private tenants with repairing responsibility to carry out essential repairs to their homes. Huntingdonshire DC is ending discretionary repairs assistance loan funding in 2015/16).

The service contributes to the delivery of the Council's Housing Strategy and the local response to major national policy shifts to more closely integrate health, social care and housing services in the Care Act 2014 and Cambridgeshire's Better Care Fund priorities. This includes the Cambridgeshire HWB Strategy, Cambridgeshire Older Persons Strategy and Cambridgeshire Social Care outcomes.

In Cambridgeshire, the number of older people is forecast to rise steadily until at least 2021. Older people are in good health but the number of frail older people is increasing especially people aged 85 or over. The Cambridgeshire JSNA (Joint Strategic Needs Assessment) Summary Report 2014/15 reports that nearly 17,000 people over 65 years (16.8%) are likely to be frail. In cambridgehire in 2011/12 there were 2,650 emergency admissions for injury due to falls in the over 65's (7.7% of admissions). The number of people of all ages living with a disability is expected to increase including children, adults with a physical disability, learning disability, visual impairment, hearing impairment or a disability on the autistic spectrum.

Establishment of the shared service

The shared service is currently operating as a partnership between Cambridge City Council, South Cambridgeshire DC and Huntingdonshire DC and was established in

2012. It is known collectively as Cambs HIA. The reasons for setting up the shared service were:

- To achieve cost savings and delivery of value for money
- To improve the resilience of the service
- To provide a platform for improving the overall service
- To provide a platform for extending the service in the future.

The shared service was required by the County Council Supporting People team who wanted to reduce and rationalise the number of contracts they managed. Whilst Fenland DC and East Cambridgeshire DC had their own DFG arrangements in place at the time of the shared service being established it was agreed that both councils should consider joining Cambs HIA at a future point.

Bringing three different teams into one was a huge challenge but all of the early settling in problems and adjustments have now been made or will be taken forward as part of the Cambs HIA Business Plan. This includes, work to take account of key legislative changes due to the Care Act 2014 and new Construction and Design Management Regulations 2015 . The focus for 2015/16 is on re-procuring a new comprehensive list of approved contractors and ongoing work as part of reviewing the internal Cambs HIA workflows. Both of these changes will help improve the key performance indicator monitoring the length of time it takes from referral to completion for the under £10k jobs.

Current Service Operation

Cambs HIA has a draft 3 year Business Plan (2015 to 2019), with the mission to:

“To support disabled and vulnerable people of all ages to improve their living conditions and quality of life by enabling them to remain living independently and safely in their home.”

Cambs HIA works with people of all ages, who may be living with complex conditions or are terminally ill. It also works with people living in housing conditions in need of maintenance, repair or improvement and also offers a wide range of information and have an extensive network of contacts about useful services. Cambs HIA work on individual, bespoke projects; mainly with people who own or privately rent their homes.

Adaptations to housing association homes in Huntingdonshire are generally carried out via Cambs HIA, who also carry out a small number of projects for housing associations in the rest of our area. Cambs HIA is not involved in works to council owned homes in Cambridge City and South Cambridgeshire as these are carried out directly by the relevant local authority.

Details of the current service are summarised in CHIA leaflets “Disabled Facilities Grants. How Cambs Home Improvement Agency can help you”, “ Grants and Loans for Home Adaptions and Repairs” and “Helping you adapt your home without grant funding”.

3. Proposal to admit East Cambridgeshire DC

Strategic Drivers

Extending the partnership is supported by key funding partners who make a significant funding contribution. This also fits closely with the national drive towards a more integrated and jointly funded operation. In addition the Cambridgeshire local authorities are increasingly exploring shared service provision across a wide range of services.

Service Delivery Drivers

The key drivers are:

- Develop a service delivery model to meet increased need in a cost effective way
- Develop the inter-agency response to urgent cases (such as, hospital discharge and terminal illness), complex needs and people in poor housing.
- Improve HIA resilience and the case for wider funding support to enable CHIA to operate into the medium to longer term
- Deliver a more robust and effective organisational structure
- Develop the quality and scope of the HIA service including other partners for specialist advice (for example, we have joined a pilot project with Foundations - the National body for Home Improvement Agency & Handyperson services- with Step Change to refer people for financial advice). See the CHIA Business Plan, Appendix A, for further details.

4. Objectives: the shared vision

The purpose of the CHIA is to provide a timely and efficient service to enable people with disabilities to live a good quality of life in their homes.

The purpose of the shared service is to achieve this overarching objective in a cost efficient and sustainable way that meets the needs of the all the partner councils.

5. Scope : the boundaries of the project

Outside the scope of this business plan are:

- Grant validation service; this is a statutory function retained by each local authority partners and will be reviewed separately.
- Handyperson service; this is outside the scope of Cambs HIA activities and is part of county-wide tendering proposal.

6. Service quality and delivery considerations.

A summary of Cambs HIA current performance is attached at Appendix B.

The core performance indicator, the time taken from referral to completion for cases under £10k is 37 weeks. National comparison data is no longer available but a snapshot review of other local authorities in Wales, Lancashire and Suffolk show that

average delivery times range between 35 and 96 weeks averaging at around 52 weeks.

Further service improvements are being sought including the establishment of a new comprehensive contractor framework (in accordance with EU regulatory requirements) which will help reduce the overall time taken to deliver the works required, set benchmark standards of performance and improve consistency in the quality of the work undertaken.

A brief summary of the pros and cons of alternative delivery options is set out in a table in Appendix B.

7. Sharing cost and financial benefits: cost benefit analysis

Financial impact of ECDC joining Cambs HIA

Based on current year data, the table below demonstrates that if East Cambs become a partner this will facilitate a restructure that would result in an improved financial position.

BUDGET SUMMARIES 2015/16.

Scenario	Income total £	Expend Total £	(Surplus)/ Deficit £
CHIA -3 partners	543,930	534,910	(9,020)
CHIA – 4 partners on joining	688,000	679,036	(8,964)
CHIA – 4 partners with restructure	688,000	661,676	(26,324)

The figures in the table are based on the following assumptions:

- Local authority DFG and Repairs Assistance capital funding will continue at or close to current levels
- County Council Social Services and Health revenue funding will continue
- Private fee income and grants from other sources continue at 15/16 levels including ECDC
- ECDC capital programme would be around £628k per year
- The budget for 2016/17 will be subject to drafting and approval in accordance with the City council's budget setting process starting in September 2015/16

8. Project Organisation: How the project will be delivered

The existing Cambs HIA Board will continue to provide strategic oversight and performance management and will pay particular attention to the implementation issues relating to the addition of East Cambridgeshire. An East Cambridgeshire officer will join this Board.

The core work associated with the integration of the day to day management operation will be overseen by the current manager of the Cambs HIA.

ICT support will be provided by Huntingdonshire DC and legal and HR support will come from Cambridge City as the lead authority. The proposed expansion of Cambs HIA is running in parallel with the establishment of shared services for ICT and legal services. This therefore needs to be coordinated with the teams involved and an appropriate link with the Shared Services Board is being considered, in consultation with the City Transformation Office

South Cambridgeshire DC will address the issues relating to accommodation.

9. Critical Success factors: Deliverables, milestones and outputs

- Inclusion of East Cambridgeshire to be completed by the beginning of April 2016 or as soon as possible after this date
- Inclusion East Cambridgeshire to be achieved with no drop in the performance of the existing Cambs HIA service during transition
- Inclusion of East Cambridgeshire to be achieved without any additional cost to the current Cambs HIA partners and at a controlled cost for East Cambridgeshire
- Overall financial profile to be improved after the first year of operation as a result of East Cambridgeshire joining the shared service
- Continuing improvement to service delivery including the time taken from referral to completion
- Improved service resilience

10. Stakeholder analysis: Interested parties and the impact on the Council's priorities

Stakeholder	Key considerations
Cambridge City Council	Require an efficient cost effective service to address the needs of people with disabilities and maintain a good quality of life in their homes. District councils have statutory responsibility meeting the DFG targets.
Huntingdonshire District Council	Service needs to be efficient at processing significant value of grants but also needs to provide a quality personal service. District councils have statutory responsibility meeting the DFG targets.
South Cambridgeshire District Council	Service needs to provide a swift delivery of adaptations in the most optimum time to meet peoples immediate needs whilst acknowledging that the available grant spend needs to be spread every through

	the year. District councils have statutory responsibility meeting the DFG targets.
East Cambridgeshire District Council	Require an efficient cost effective service to address the needs of people with disabilities and maintain a good quality of life in their homes. District councils have statutory responsibility meeting the DFG targets.
Cambridgeshire County Council	Require an efficient cost effective service to address the needs of people with disabilities and maintain a good quality of life in their homes. This is particularly important in helping to minimise the cost of social care interventions required. The County are the holders of the DFG from the DoH.
Cambridgeshire CCG	Require an efficient cost effective service to address the needs of people with disabilities and maintain a good quality of life in their homes. This is particularly important in helping to minimise the cost of health care interventions required and to maximise prevention strategies such as falls prevention.
DoH	Provide DFG funding to meet the needs of people with disabilities.
Customers	Require a good quality and well administered service to help provide them with the advice and adaptations they need to maintain a good quality of life in their homes. Some customers have serious conditions and some have a terminal diagnosis, The swift delivery of adaptations is therefore critical to these customers.

11. Communications Strategy and plan

There are three key elements of the communications strategy:

Staff – specific communications are required with staff particularly those at East Cambridgeshire to ensure the smooth transition to an expanded shared service. Some of the communication timeframes such as those associated with TUPE have statutory limits to be advised by HR.

Elected Members – once a decision has been taken Members will need to be kept up to date on the progress of the shared service implementation and the outcomes of the extended shared service after the first year of operation.

Customers and referral agencies – once a decision has been taken the key referral agencies such as the Occupational Therapy Service need to be informed of the changes taking place. Promotional literature also needs to be revised particularly for those customers in East Cambridgeshire.

A detailed communications strategy will be drawn up as part of the implementation process scheduled to start in September.

12. Risks and Issues

Appendix C sets out the key risks associated with the proposal to accept East Cambridgeshire into Cambs HIA.

13. Assumptions and constraints

The existing Cambs HIA shared service has been developed over the last three years. It is assumed that the extension of the service to include the East Cambridgeshire area will be based on the existing Cambs HIA service delivery model with adjustments as needed.

All the councils are operating in a context of increasing financial pressures and the development of the shared service is intended to offer financial efficiencies for all parties.

14. How the service will be managed

The existing shared service already has a management structure that can be easily extended to cover the management of the extra staff from East Cambridgeshire.

The Cambs HIA Board will be extended to include an East Cambridgeshire representative. Future governance arrangements will be reviewed to ensure that there is consistency with the developing model for other shared services in Cambridgeshire.

15. Implementation

Implementation Project costs.

Staff time will be required to contribute to delivery of the project plan. This has been reported to the City Business Transformation Unit including further capacity to support the co-ordination of this project if it is approved.

Key aspects of this work will be undertaken by Cambridge City as the lead authority for the project including:

- Legal services lead to draft and finalise the extended shared service legal agreement following instructions agreed by the CHIA Board

- HR services: including due diligence and TUPE transfer arrangements
- ICT set up and data transfer liaising with Hunts DC ICT service

The set up costs of up to £18,786 will be met by East Cambs District Council (ECDC). See appendix 2. This includes ICT equipment at the ECDC satellite office and at SCDC, plus office facilities and equipment for the extended operation (some of these costs can be reduced depending on ECDC decisions). Liability for costs related to staff who do not transfer to Cambs HIA are not included in this figure and would also be the responsibility of ECDC.

Contract Arrangements

Subject to Member approval from all partners, a new legal shared service agreement will be entered into for a three year period from April 2016-March 2019, by all partner councils.

Implementation issues

- Maintain and develop customer service in East Cambs based on and as part of the CHIA model
- Service delivery in East Cambs becomes the responsibility of Cambs HIA. Experience from the set-up of CHIA will be used to plan implementation carefully, manage the change and seek to minimise or avoid negative impacts of change on users of the service and staff
- The East Cambs staff team will transfer (under TUPE regulations) to the City Council (as lead partner). The proposal is to transfer the team (currently a maximum of 3 people) and restructure within 6 months.
- Recruitment to fill essential staff capacity gaps will be undertaken e.g. surveyor for technical services
- The current case records will be incorporated into the CHIA wholly electronic case recording and file management systems.
- ICT hardware and software from HDC will be supplied and used by the transferring staff and the East Cambs Grant Validation Officers
- A satellite CHIA office will operate at East Cambs District council (at nil cost to CHIA). CHIA has developed flexible working with staff operating in various locations including home working.
- East Cambs will become a partner member, join the CHIA Management Board and contribute to the planning, oversight and delivery of CHIA.
- East Cambs will have ongoing costs related to ICT technical support and software costs for Grant Validation Officers

Implementation Timescale

A number of key strands will need to be timetabled once a decision has been made. These include:

- ICT arrangements
- HR matters including staff TUPE
- Drafting of legal agreement
- Accommodation

It is envisaged that the bulk of this activity can be completed before a go live date of 1st April 2016. However, whilst this is convenient for accounting purposes, if more time is needed then a later start date can be agreed.

16. Conclusion

There has been an overall cost saving achieved by sharing this service. In addition the 2014/15 outturn figures show a modest surplus achieved during the year allowing necessary service improvements e.g. IT upgrades and procurement activity to be funded without recourse to the partner authorities budgets.

The service has greater resilience with the larger team able to deal with holiday and sickness absences more comfortably than the previous smaller teams could do.

The shared service has been effective in engaging contractually with other agencies particularly Occupational Therapy service and this has helped improved the flow of referrals. A shared service remains the preference for County Council and the health care bodies.

The addition of East Cambridgeshire to the partnership will strengthen the financial position and further increase the overall resilience. East Cambridgeshire will benefit from the scale offered by the existing shared service. The addition of one smaller partner will not be as challenging as setting up the original shared service and the risk of a fall in the efficiency of the service during this transition is small.

Overall whilst improvements can still be made the reasons for retaining the shared service remain strong. Similarly the benefits of incorporating East Cambridgeshire into the partnership outweigh any of the potential risks.

Summary of Cambs HIA performance

Financial

Cambs HIA has a ring fenced budget. Operating costs must be met from fee income, plus grants from the County Council (social care) and Health (Uniting Care Partnership), and contributions from customers towards part of all of the works (if they fail the financial means test). Fee income earning potential currently relies on council's housing grants and loans capital programme.

The outturn figures for 2014/15 (including c/f surplus) are as follows:

AREA	(Profit)/loss share £
City	(6,720)
S Cambs	(5,136)
Hunts	(14,604)
Total	(26,461)

The current capital programme for 2015/16 is as follows:

AREA	£k
City	745
S Cambs	760
Hunts	1,575
Total	3,080

Activity

The table below gives a summary of what Cambs HIA has delivered over the past three years.

Description	2012/13	2012/13 All	2013/14	2013/14 All	2014/15	2014/15 All
All enquiries	CC 195 SC 240 HD 434	869	CC 257 SC 289 HD 481	1027	CC 216 SC 309 HD 437	962
Completed DFG jobs	CC 68 SC 77 HD 189	334	CC 86 SC 75 HD 238	399	CC 64 SC 62 HD 203	329
% private tenure	CC 73 SC 90 HD 54	68%	CC 74 SC 86 HD 57	69%	CC 72 SC 85 HD 57	69%
DFG grant spend (nearest K)	CC 470K SC 507K HD 1,239K	£2,216K	CC 578K SC 663K HD 1,723K	£2,964K	CC 557K SC 641K HD 1,381K	£2,578K
Disc grants complete	CC 25 SC 29 HD 11	65	CC 34 SC 27 HD 18	79	CC 33 SC 23 HD 14	70
Disc grant spend (nearest K)	CC 103K SC 106K HD 54K	£ 263K	CC 81K SC 111K HD 113K	£ 305K	CC 163K SC 60K HD 92K	£ 315K

Overall activity during 2014/15 was as follows:

Description	City	S Cambs	Hunts	All
Enquiries	216	309	437	962
DFG referrals	88	105	277	470
DFG complete	64	62	203	329
Caseload at year end	67	141	176	384
Discretionary grant applications	28	21	16	65
Discretionary grant approvals	28	21	15	64
Discretionary grant completions	33	23	14	70

Overall there are high levels of satisfaction with all aspects of the work provided by the HIA and the contractors. Overall satisfaction shows 97% for Cambridge City, 100% for South Cambridgeshire DC and 89% for Huntingdonshire DC.

The time taken to complete works following a referral is measured as one of the key performance indicators for the HIA for cases <£10K and for those >£10K. For 2014/15 the time taken in weeks is as follows.

Description	City	S Cambs	Hunts	All
Av time referral to completion (weeks) <£10K	35	49	34	37
Av time referral to completion (weeks) >£10K	64	74	69	72

This shows an improvement for South Cambridgeshire since the 2010/11 figures (previously 58 weeks) but a slow down for both Cambridge City and Huntingdonshire DC (previously 22 and 19 weeks respectively). Verification of historical data to ensure comparability and consistency of measurement with current data is not possible. Operationally, the view is that there have been significant improvements in monitoring and delivery. There have also been significant policy shifts including decline in alternative funding sources that require more follow up and detailed analysis of options before adaptations can proceed.

For more information about Cambs HIA See Annual Reports 2012/13, 2013/14 & website www.cambshia.org

Consideration of options

Options	Advantages	Disadvantages
Continue existing shared service partnership without ECDC	<ul style="list-style-type: none"> • Time & capacity to manage further change not required • Focus on current service efficiencies and effectiveness 	<ul style="list-style-type: none"> • Future sustainability more at risk • Less scope to develop organisational structure • Economies of scale reduced • Future funding-revenue from partners & central government capital less certain after 2015/16
Local authorities abandon Cambs HIA and deliver a grant administration service only	<ul style="list-style-type: none"> • Reduce scope of activity • Simplify workload Reduce take up. 	<ul style="list-style-type: none"> • Major reduction in service and support for vulnerable people when need is growing & more complex cases • Increase staff time on enquiries and assistance to self manage the process • Counter to joint working, current strategies and legislation e.g. Care Act
ECDC by join Cambs HIA Partnership	<ul style="list-style-type: none"> • Customer service development and growth opportunities • Improved service continuity & lower risks from staff change • Improve future sustainability & influence due to scale • CHIA experience and opportunity for detailed implementation planning • Ongoing direct Influence on future plans & operations • Staff know each other/local organisation • Removes ongoing revenue funding by ECDC • Fits with national policy shift & trends in other areas for HIAs to operate across a bigger area 	<ul style="list-style-type: none"> • Widening of 'local' focus & concerns about customer service • Further change and new set up costs (after transferring from an independent Agency service into the local authority) • Time and capacity for implementation planning & consultations • Time limited agreement. Influence but not control on future direction. • Economies of scale & other cost saving measures may not be realised until year 2 onwards

<p>Abandon Cambs HIA and tender for HIA service</p>	<ul style="list-style-type: none"> • Wider market testing of providers • Customer service and growth opportunities • Economies of scale may be realised quickly • Fits with national policy shift & trends in other areas for HIAs to operate across a bigger area 	<ul style="list-style-type: none"> • TUPE transfer obligations impact heavily on attractiveness to the market • Loss of wholly local focus • Less able to influence overall organisational strategy & direction • Risk of more fragmentation of the service • Future revenue funding from partners uncertain • Need to test for community benefit as well as VFM
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Appendix C Cambs HIA ECDC Merger - Risk Considerations

June 2015

[Numbers in header rows refer to Notes at the end of the document.]



Ref. [1]	Title and Description of risk	Control measures / sources of assurance in place	Risk score [2, 3]	
			Impact	Likelihood
1	Cambs HIA staffing capacity Lack of capacity in the Cambs HIA staff team <i>leading to delays in effecting the merger with ECDC, resulting in loss of performance in core business, increased delays in case throughput, loss of income</i>	Careful implementation planning and preparation to be put in place Potential to draw on extra resources to help process for a temporary period	Impact Likelihood Total	3 3 9
2	Loss of project team members Loss of key project staff during the implementation period <i>leading to delays in effecting the merger with ECDC, resulting in loss of performance in core business, increased delays in case throughput, loss of income</i>	Extension to the existing Cambs HIA supported by four councils with the potential to fill gaps from across a wide range of staff Newly forming shared service arrangements will provide further support to the implementation phase	Impact Likelihood Total	3 2 6
3	ICT problems Technical problems associated with setting up ICT or data transfer <i>leading to delays in effecting the merger with ECDC, resulting in loss of performance in core business, increased delays in case throughput, loss of income</i>	Preliminary work already undertaken to assess the likelihood of these sort of problems and there are considered unlikely Implementation plan will include time to resolve most ICT snags Core IT system already up And running for existing Cambs HIA	Impact Likelihood Total	3 2 6
4	Increased operational costs Increase in running costs needed to extend the area of operation <i>leading to difficulty in maintaining a balanced budget resulting in extra costs to partners from General Fund</i>	Extra cost will be matched by extra income Economies of scale will be achieved by the inclusion of ECDC ECDC will be meeting all of the initial set up costs Cambs HIA Board oversee financial performance data on a quarterly basis and can make service adjustments if necessary	Impact Likelihood Total	2 2 4
5	Loss of operational focus Merger activity disrupts day to day workflows <i>leading to delays in delivering core services, resulting in loss of performance in core business, increased delays in case throughput, loss of income</i>	Careful implementation planning and preparation to be put in place Core team well established Only three staff subject to TUPE	Impact Likelihood Total	3 3 9

Notes

1. The "Ref." is a unique risk reference, retained by the risk throughout the period of its inclusion in the risk register.
2. Criteria and guidelines for assessing Impact and Likelihood are available on In-Site.
3. The "Total" risk score is obtained by multiplying the Impact score by the Likelihood score.

Impact

- 5 Extreme
- 4 High
- 3 Medium
- 2 Low
- 1 Insignificant

Likelihood

- 5 Almost certain
- 4 Likely
- 3 Possible
- 2 Unlikely
- 1 Rare

Direction of Travel

- ↓ Priority reduced from last review
(give the previous Total score in the brackets)
- Priority equal to last review
- ↑ Priority increased from last review
(give the previous Total score in the brackets)
- new Risk included in the risk register for the first time

Criteria and guidelines for assessing Impact and likelihood

Impact	Giving rise to one or more of the following:								Likelihood	Score
	Service disruption	People	Financial loss (including claim or fine)	Environment	Statutory service/legal obligations	Management	Reputation	Score		
Extreme	Serious disruption to services (loss of services for more than 7 days)	Loss of life	Financial loss over £500k	Major regional / national environmental damage	<ul style="list-style-type: none"> Central government intervention; or Multiple civil or criminal suits 	Could lead to resignation of Leader or Chief Executive	Extensive adverse coverage in national press and/or television	5	<ul style="list-style-type: none"> Is expected to occur in most circumstances (more than 90%), or Could happen in the next year, or More than 90% likely to occur in the next 12 months 	5
High	Major disruption to services (loss of services for up to 7 days)	Extensive multiple injuries	Financial loss between £251k - £500k	Major local environmental damage	<ul style="list-style-type: none"> Strong regulatory sanctions; or Litigation 	Could lead to resignation of Member or Executive Director	Adverse coverage in national press and/or television	4	<ul style="list-style-type: none"> Will probably occur at some time, or in some circumstances (66% - 90%), or Could happen in the next 2 years, or 66% to 90% likely to occur in the next 12 months 	4
Medium	Noticeable disruption to services (loss of services for up to 48 hours)	Serious injury (medical treatment required)	Financial loss between £51k - £250k	Moderate environmental damage	<ul style="list-style-type: none"> Regulatory sanctions, interventions, public interest reports; or Litigation 	Disciplinary / capability procedures invoked	Extensive adverse front page local press coverage	3	<ul style="list-style-type: none"> Fairly likely to occur at some time, or in some circumstances (36% - 65%), or Could happen in the next 3 years, or 36% to 65% likely to occur in the next 12 months 	3
Low	Some disruption to internal services; no impact on customers	Minor injury (first aid)	Financial loss of between £6k - £50k	Minor environmental damage	<ul style="list-style-type: none"> Minor regulatory consequences; or Litigation 	Formal HR procedure invoked	Some local press coverage; or, adverse internal comment	2	<ul style="list-style-type: none"> Is unlikely to occur, but could, at some time (11% - 35%), or Could happen in the next 10 years, or 11% to 35% likely to occur in the next 12 months 	2
Insignificant	Insignificant disruption to internal services; no impact on customers	No injuries	Financial loss of up to £5k	Insignificant environmental damage	<ul style="list-style-type: none"> No regulatory consequences; or Litigation 	Informal HR procedure invoked	No reputational damage	1	<ul style="list-style-type: none"> May only occur in exceptional circumstances (up to 10%), or Unlikely to happen in the next 10 years, or Up to 10% likely to occur in the next 12 months 	1