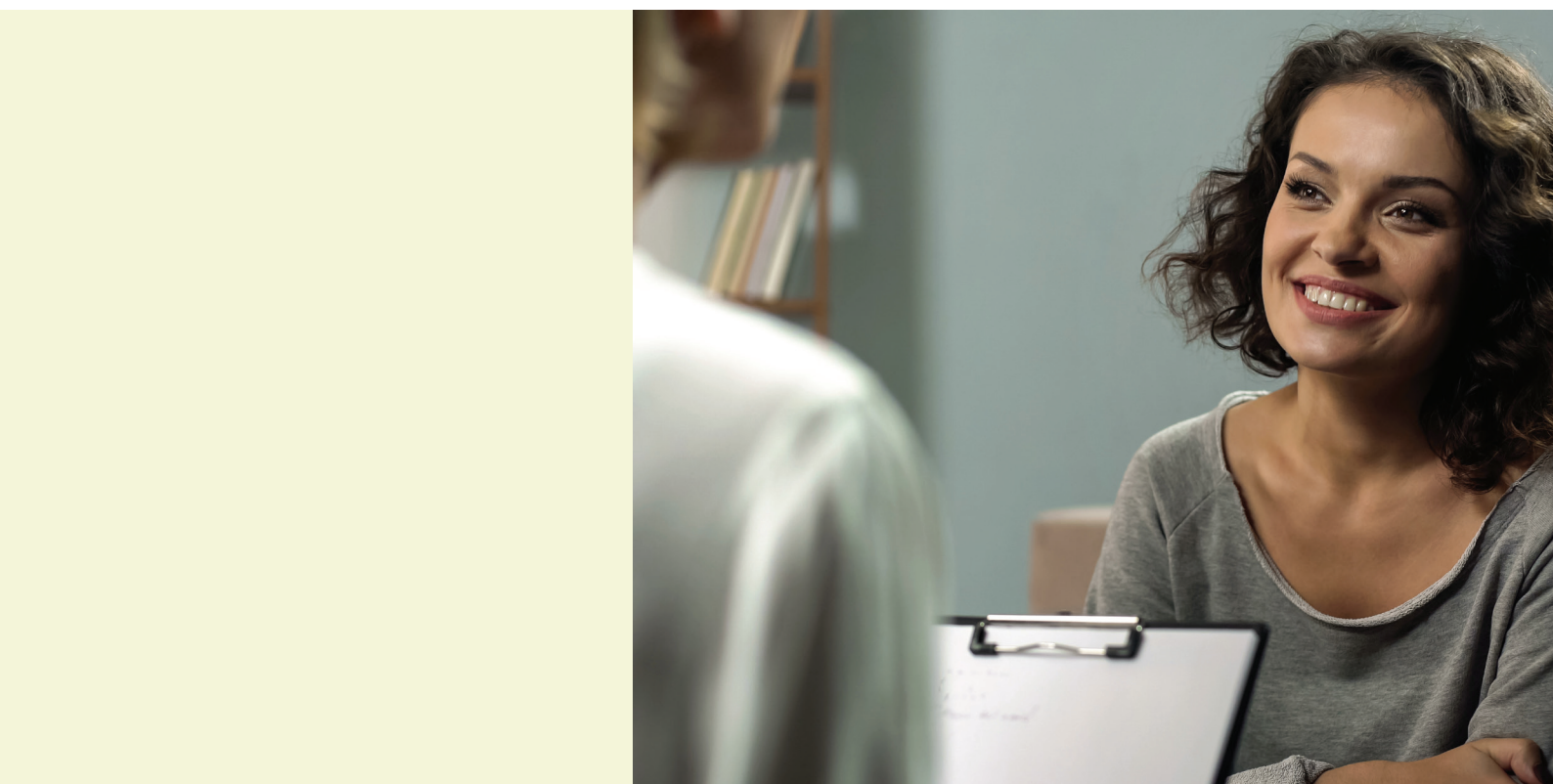


# Business Plan 2021-2022

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Advice, support and housing  
for a better tomorrow

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## SECTION 1

# Introduction

## Introduction from the Chief Executive and Chair

Any organisation is constantly having to adapt, plan and change in order to meet the challenges of life. The current COVID-19 Pandemic and the restructuring of Local Government in Northamptonshire are two such events that have caused Accommodation Concern to re-evaluate and re-plan our activities in a changing environment. We are proud of the way Accommodation Concern staff have adapted and adopted COVID safe working practices in the past year to meet the needs of our service users.

We are conscious however that the year ahead will bring further and different challenges as our communities emerge from lockdown and tackle the economic impact arising from the past year. It is therefore important for us as staff and trustees to plan and prepare as much as possible so we can act responsibly and quickly in a changing landscape. Our planning is reflected in this Business Plan which acknowledges the demands which we are facing, but also looks forward with enthusiasm to the opportunities available. As ever, we are motivated to make a positive difference in the lives of our service users and local communities by providing “Advice, support and housing for a better tomorrow”. We believe this Business Plan will chart the course for Accommodation Concern to provide the valuable services in the community we care so passionately about.



Jo Moore, Chief Executive



Phillip Staves, Chair



## SECTION 2

# Executive Summary

Accommodation Concern has an existing 5-year strategy from 2019-2024 which guides and informs the development of the charity.

### 5 main charity priorities identified in the 5-year strategy produced in 2019

- 1 AC lead on professional permanent 24/7 homelessness centre with resources (including launderette, storage and PO box address) and Outreach Team
- 2 AC as an ethical landlord with adult and youth supported accommodation
- 3 AC provide activities and courses: Art, Music, English and Maths
- 4 AC as robust cross sector partner
- 5 AC as a community educator of root causes and collective impact solutions to rough sleeping

The Trustees recognised that notwithstanding the continuing value and relevance of the 5-year strategy, 2020 had brought significant developments which the charity should recognise in its business plan for 2021-2022. Most notably of course was the impact of COVID-19 on the needs of the local population and the development of appropriate methods of service delivery to meet those needs. Changes in Local Authority structures from 2021 are also very significant locally in affecting the commissioning landscape in Northamptonshire. The Charity quickly identified its 5 main priorities through the period of COVID-19 community restrictions and recognised the adjustment to the period following the pandemic required careful consideration.

### Our 5 COVID priorities

- 1 Keeping the residents in our 4 properties who would otherwise be homeless, safe, supported and well during self-isolation.
- 2 Supporting 17 rough sleepers into accommodation; keeping them safe and connected, and ensuring they have access to all of the professional support they need.
- 3 Moving our drop-in housing and benefits advice service to telephone or video calls.
- 4 Working with local agencies to ensure delivery of our weekly food parcels to the most vulnerable and at-risk clients.
- 5 Caring for and supporting our staff team, so they stay well, engaged and positive during a period when they are having to self-isolate and work from home.

This updated Business Plan contains Trustee analysis of the changing situation and Accommodation Concern's position within the new environment to inform a focussed and relevant action plan for 2021-2023. There is also an overview of the financial position. The Trustees' conclusions were that notwithstanding the challenges of the changing environment, Accommodation Concern should be aware of the potential opportunities arising given the charity's agile response to all that 2020 had brought. The Trustees have determined 5 new key priorities for the next two years so that the charity can remain focussed on its Core Values whilst responding to new initiatives.

These priorities form the base of the action plan at **Appendix 1**.

An analysis of risks and mitigations to support the Board manage the charity effectively and responsibility is included at **Appendix 2**.



## SECTION 3

# About Accommodation Concern

Accommodation Concern prevents and alleviates poverty, need, hardship and distress, by delivering advice, support and preventative services designed to end homelessness, build independence and resilience and improve well-being and life chances. All services are free, at the point of delivery, and open to anyone from 16 years of age. Accommodation Concern is the only independent, dedicated anti-poverty and homelessness prevention charity, based in Kettering. Our advice is free and impartial. Our advice services hold the Advice Quality Standard in Housing, Debt and Welfare Benefits.

Accommodation Concern was established in 1987, evolving from the shared vision of local day centres, clergy, and Councilors of all political persuasions. The vision was for a single organisation to work with local people affected by homelessness or in a precarious housing position. By 1992 the organisation had grown and a charity was formed. In 2012, although still a charity (charity number 1146257) we formed a Company Limited by Guarantee (CLG 07945758) to support our work.

The charity aims to assist disadvantaged and vulnerable community members especially rough sleepers, homeless and those on the edge of homelessness. As such the charity is at the forefront of social action towards safe, stable and ultimately independent accommodation within the area.

The charity offers a wide range of needs led free services which are mainly accessed by adults, although there are an increasing number of younger members of the community who are rough sleepers, homeless, sofa-surfing, in temporary accommodation or living in poverty. Positive outcomes and impact achieved includes enabling access to: increasing distribution of nourishment/food and hygiene resources; alongside improving independent learning especially transferable life skills

We know that prompt and accurate advice can help clients to make informed choices and can often help prevent the trauma, emotional, physical and financial cost of homelessness. We all work hard to support clients to meet their basic needs and realise their potential. People can rely on us for support, advice, life skills training and practical assistance.

Monday to Friday the charity provides Kettering town centre with its Advice Centre staffed by 8 staff and supported by a team of volunteers. In the last few years its supported accommodation offer has grown to 4 houses, supporting 13 residents and 6 Rough Sleeper initiative funded properties for entrenched rough sleepers wanting to move into long term accommodation with intensive support.

The Chief Executive and 8 trustees (with an adviser) manage the strategic direction of the Charity through a Board and sub-committee structure (HR, Finance and Governance). The Charity exists to provide "Advice, support and housing for a better tomorrow"



## SECTION 4

# Operating Environment

The trustees undertook an analysis of the environment Accommodation Concern are operating in 2021. COVID-19 had a significant impact in different ways. Different sources of funding have become available and at shorter notice. The Government's commitment to reduce rough sleeping during the pandemic resulted in tenancy offers for many AC clients who have managed to maintain these tenancies with AC support. However, economic hardship for disadvantaged people has been exacerbated by the pandemic and the anticipated growth in unemployment is likely to continue this trend. COVID-19 has also affected methods of service delivery to ensure services are delivered in a COVID secure way such as moving the 'Drop in' advice service to a phone-based or appointment led service. As the vaccination programme continues and community restrictions are relaxed, the charity will need to determine and monitor the most effective and safe ways of working in the new environment.

Changes in local authority structures in Northamptonshire that came into effect in April 2021 will mean ongoing changes in commissioning structures. It also opens up the possibilities for Accommodation Concern to extend its influence as a trusted provider and deliver services across a wider geographical region of the county. The Trustees carefully considered the potential benefits and risks of geographical expansion.

The Trustees reviewed and agreed the core purpose of the charity and its values remain the same.

	Theme	Action	Quality Assurance/ Measure
<b>A</b>	Accommodation & Tenancy Support	Supported Accommodation Provision Helping people who have lost their home Helping people to maintain their tenancies House Safety Housing Led models	Number of residents supported through properties Learning outcomes achieved Housing First/Led principles
<b>B</b>	Housing, Debt & Benefit Advice Centre	Housing Benefits Debt Budgeting Form filling support	AQS Accreditation FCA compliance
<b>C</b>	Referrals	Substance Misuse Mental Health GP Social Services	
<b>D</b>	Resources	Food Bank Access to grants Volunteering opportunities	

Values

- 1 Honest
- 2 Realistic expectations shared
- 3 Empowering
- 4 Inclusive
- 5 Accessible
- 6 Transparent
- 7 Respectful
- 8 Listening
- 9 Reputable
- 10 Team
- 11 Confidential
- 12 Person centred
- 13 Ethical
- 14 Accountable

The trustees utilised **PESTLE** and **SWOT** exercises (key points summarised below) to consider the wider operating environment;

Pestle

Political

North Northamptonshire: there will be new relationships to form as they move from 4 Sovereign Borough Housing Directors to 1 Unitary Housing lead

There will be a need for AC to nurture new and build on existing relationships, to ensure the profile and knowledge of AC services and achievements are known

AC will need to be nimble as there could be shifts in policy post COVID and in new Local Authority arrangements

AC may need to react quickly to changes in funding arrangements, possibly including intensive housing management changes

Economic

There were a number of new grants available during COVID-19 and potentially there may be more to support the recovery

Furlough ending will bring more debt and a requirement for advice and support

There could be potential for government cutting funding in response to national debt

Social

Potential for huge amounts of deprivation coming out of COVID restrictions

Knock on effect to mental health, alcohol, substance abuse

May affect all areas of community; we are starting to see professional people asking for support

Do we know enough about the possible social impacts / can we plan in advance for the services that will draw the biggest demands?

Who are the priority groups, will this apply to the wider area with the unitary change?

There is probably a higher (or different) level of deprivation across Corby, Kettering and Wellingborough than East Northamptonshire

AC need to collate all the knowledge we have and define priority areas to inform future income generation strategy

Technological

There are restrictions as some client groups do not have access to the internet and often phones

Often on PAYG phones. Digital access for the services users must remain a consideration

As a staff group there has been good investment around hardware and software internally. The IT we have in place allows for remote working; the infrastructure is in place

Legal

Requirement to keep up to date on HR; the board has the right skill sets

COVID secure legal requirements; impacts health and safety – Croner support in place

Advice – staff need to remain up to date on legal changes (e.g. eviction); CMA for debt advice (debt relief orders)

Would be useful to have a trustee with a legal background

Environmental

AC are the only agency providing housing advice and debt advice

... but there are other service providers doing similar things such as foodbanks, day centres and supported accommodation

Do we have an opportunity to take a lead? Would the council be looking for a lead agency? We need to work closely with other agencies to create partnerships

SWOT

By way of further analysis, the Trustees also undertook a SWOT assessment.

<p><b>Strengths</b></p> <ul style="list-style-type: none"><li>• Advice given – strength in change of environment</li><li>• Knowledge breadth – debt management etc.</li><li>• Location, accessibility</li><li>• Leadership, experience, team, staffing asset</li><li>• Open door to anyone, can do attitude</li><li>• Knowledgeable, approachable, motivated staff</li><li>• Speed – no red tape – hit the ground running</li><li>• Reputation – strong with partners</li><li>• Passion and determination to go above and beyond</li></ul>	<p><b>Weaknesses</b></p> <ul style="list-style-type: none"><li>• Database needs updating</li><li>• Team stretched on the volume of work</li><li>• Job security – funding is only short term</li><li>• Boundaries – recognizing expertise but knowing when to hand over</li><li>• Unknowns with the unitary etc</li><li>• Funding / Sustainability – financial stability of the charity</li><li>• Profile of AC- public advocates that can support/speaking up for AC</li><li>• Privacy for the CEO – Suitable office space</li><li>• Management Structure support</li><li>• Finance to support core costs</li><li>• Lack of partnership working</li></ul>
<p><b>Opportunities</b></p> <ul style="list-style-type: none"><li>• New paint project</li><li>• Reorganisation of local mental health approach (primary care networks)</li><li>• AC being a social enterprise would fit into the new procurement processes – considering the social value – social value act/social impact</li><li>• Engaging with officers of the new unitary to influence policy direction</li><li>• Private landlords owning houses that could not evict – landlords may want to rent to AC</li></ul>	<p><b>Threats</b></p> <ul style="list-style-type: none"><li>• Unitary – Threat of looking outside of the area</li><li>• Funding opportunities could be decided primarily on price rather than quality</li><li>• A number of new housing providers coming into the area</li><li>• Outreach may be taken in house after 2021</li></ul>





## SECTION 5

# 2021-2023 Priorities

The trustees confirmed their long-term vision for Accommodation Concern including:

- Changing more lives with more success stories
- Being the organisation for breaking the cycle of deprivation and changing lives
- Building sustainability
- Delivering expertise in housing, advice, benefits, debt and supported housing
- Moving into a wider area as an organisation of choice and using a body of expertise to grow (unitary and beyond)
- Recognising staff achievements

Accommodation Concern is still committed to its existing priorities within the Five-Year Strategy but some of those such as holistic client support through individual education and mentoring plans will be a focus primarily for future years. The trustees confirmed the key priorities for 2021 as follows;

### Five Main Priorities

1. Maintain a high-quality housing, benefit and debt advice service
2. Provide high quality supported accommodation housing units
3. Prepare for the local authority changes positioning Accommodation Concern as a lead provider
4. Improve sustainability through diversification of income streams
5. Develop existing service provision in response to changing operational environment

An action plan for 2021 to support achievement of the five main priorities is included at **Appendix 1**



## SECTION 6

# Financial Overview

Accommodation Concern has in recent years gone through a process of significant change in management, services provided and internal structure. As a consequence, the financial outgoings of the charity have been greater than its income and financial deficits have been filed for the past two years. These deficits have been accommodated by pre-existing reserves held within the charity and the Board of Trustees are satisfied that at present sufficient reserves are still held within the charity to meet all financial obligations and continue to operate.

COVID-19 has had a significant impact on both the operations and financial position of the charity during the financial year. Prior to the pandemic the charity had forecasted for a further year of deficit. However, to address this the Board of Trustees had actively identified options to reduce/eliminate this deficit within the forthcoming financing years. COVID's impact on the financial position of the charity has been in two ways.

- Firstly, the pandemic halted our ability to implement some of our planned changes to reduce the deficit and
- Secondly the pandemic gave the charity the ability to access additional financial support which was made available both by way of nationwide support for all businesses and specific funding made available to support charities who were financially impacted by the pandemic

Furthermore, significant costs were saved due to our inability to recruit during lockdown for roles which were vacant for some time and which costs had been included within the original budget. The net financial impact of the pandemic on 2020/21 was that although originally anticipating a deficit we closed the year with a modest surplus.

The Trustees are aware that there is still an underlying deficit within the charity that needs to be addressed. We have revisited previous plans to access new revenue streams and also to increase existing revenue streams, specifically associated to projects providing funding which is self-generated by the charity and does not rely solely on grant income.

This approach is specifically designed to improve the diversity of revenue streams therefore mitigating the risk of over dependence on any one provider/source. To support this objective, we have enrolled a business development manager to drive this ambition forward and ensure that focus is maintained on business growth whilst the charity is also focused on the day-to-day activities of providing its valued services to the community.



Graham Perkins  
Finance Director



## SECTION 7

# Business Plan for Money Advice Centre

### Vision

To develop a sustainable free money advice service in the Kettering & North Northamptonshire area, which will be professionally operated, taking account of all relevant risks. The service is being put in place because Accommodation Concern have identified a need for debt and money advice provision in the local community, particularly with the number of people approaching our housing advice service that have underlying financial concerns that need addressing. Currently we refer to Credit Union and our local Citizens Advice who both report long waiting lists. We are also aware that the current COVID-19 pandemic will result in many more people requiring a service to manage their money.

Our vision is to give non-judgemental, free help and support to people with money problems in the local community, and also to provide money education to try to prevent problems arising or re-occurring in the future.

### Mission

To provide a face-to-face money advice service, which is free of charge, unconditional, and confidential. It will be in affiliation with the national money advice charity, Community Money Advice (CMA).

### Goal

We plan to offer advice and guidance, taking account of individual circumstances, in order to help people to understand their options, and to empower them to make informed decisions, so as to bring improvements to their lives.

### The Service

A team of dedicated paid staff members and volunteers will provide a service open to clients for at least 20 hours per week, offering the following services:

- To run appointments (and a drop-in service) for clients, completely free of charge;
- To provide a relaxed, private consultation environment and a warm welcome;
- To give impartial debt advice based on the individual needs of each client and to include: debt management plans, insolvency solutions, budgeting education, and other approaches as appropriate;
- To act on behalf of the client to negotiate with creditors, courts, insolvency administrators, and other third parties to create a sustainable debt solution plan individually tailored for each client;
- To be available to clients for as many consultations as required, in order to achieve a realistic debt solution plan;
- To work with the client with regard to budget management, to create a long-term money management regime, which the client can maintain

Attracting Clients

We expect that the majority of our clients will come from the local community, and that they will be referred to us by other agencies. We have therefore already made links with Kettering Community Unit (Food bank), Kettering & Corby Citizens Advice, Churches Together in Kettering, Kettering Borough Council, S2S, Mind and Homestart.

We will seek to establish further networking with Social Services, GP practices, and other agencies that could be a source of clients. We see networking with other agencies as an essential strategy for our service’s success.

We will also be undertaking local marketing through holding events, producing leaflets, social media posts and our website, to attract clients directly. We will not be employing lead generators or other professional resources.

Support Routes

As it is essential that the service provides an excellent standard of advice, it is important that routes to advice support are in place for advisers. To address this, the service will be accessing support via:

- 1

The CMA Advice line (for Advisers)
- 2

Our CMA Operations Support Manager
- 3

Information resources, such as the CPAG Debt Advice Handbook and online resources

As members of AdviceUK, we will also have access to their support services. More specific support will be subject to referrals.

Referrals/Signposting

In the event that our service is not in a position to help a client, due to either excessive case load or lack of relevant expertise, we would seek to signpost or refer them on to another agency/necessary service. This may be the local CAB, Step Change, other local money advice centre, Credit Union or a professional service, e.g. an Independent Financial Adviser.

We would follow our Signposting/Referral flowchart, obtain authority and complete the Signposting/Referral Record.

Regarding Individual Voluntary Arrangements (IVA’s, or Trust Deeds in Scotland) these will be referred to Aperture (Grant Thornton Group) via the CMA Advice line. DRO’s (England & Wales only) will be referred to the CMA DRO Intermediary Team, until we have gained sufficient experience for a member of our own team to become a qualified intermediary. Debt Arrangement Schemes (DAS) (Scotland only) will be referred to a DAS administrator until the team has their own qualified staff member. The service will not be taking on business debts beyond simple sole traders, so will refer such cases to the Business Debtline.

Regulation and Quality

The service will be run in accordance within the regulatory and operational requirements of Community Money Advice Ltd, and by extension, the standards defined by the Financial Conduct Authority (FCA), Financial Ombudsman Service (FOS) and the Money Advice Service (MAS), and additionally in Scotland, Holyrood legislation and Money Advice Scotland (MAS). The service’s debt advice process is detailed in the CMA leaflet, ‘CMA CONC Advisers Guide’, and made available to all advisers as a hard copy leaflet.

We have carefully considered the potential risks involved in running a free debt advice service, such as the ability to offer continuing advice, the quality of advice and the service quality from the team. We are

confident that these have been mitigated by our Corporate Risk Assessment, Compliance procedures, our training programme and the support routes available to us.

The process of interaction with the client is shown in the Procedure Flowcharts, the Debt Advice Process, and the Complaints Procedure.

Team Experience and Development

Two members of our board of Trustees hold FCA registrations in their own right as independent financial advisors so are aware and are committed to the organisation setting up as a centre. However, they will not be directly involved with the project.

Accommodation Concern’s CEO is an experienced manager with a background in advocacy and third sector working, and has undertaken the relevant training to be able to provide case work supervision.

Our current Senior Housing Advisor has previously undertaken training to Generalist standard but has also undertaken update training to ensure all advice given is current.

All advisers are being trained, as a minimum, to Generalist standard, through CMA’s training programme.

There will be further ongoing training for the team through CMA courses, as well as through the Money Advice Trust’s Wiseradviser courses, and all of the team will be aware of the necessary process and procedure for dealing with clients.

Regular team meetings will be part of future activity, which will include training and continuing personal development, in order to enhance skills in dealing with people. Feedback from such meetings will be sought in due course.

Record-Keeping and Reporting

There is both paper-based, and electronic collection of data. The centre uses the Advice Pro system; which CMA have confirmed is acceptable. This system also provides a reporting facility, which assists the centre, but also enables information to be fed back to the FCA. The record-keeping also enables the monitoring and review of client cases.

Sustainability and Business Development

Sustainability is dependent on the maintenance of the management and advice team, and as such, staffing is subject to succession planning, monitoring, and review on a rolling basis.

Sustainability also has financial concerns at its core, and how these are dealt with. The centre is a project that is part of Accommodation Concern for governance purposes. The finances of the centre, therefore, are included in the accounting process for Accommodation Concern.

The service will be developed in a sustainable manner according to opportunities for team growth, and with a view to maximising the service’s client base within the team’s capacity to provide a full and uncompromised service to all clients as defined in ‘The Service’ (above).

Further Activity

There are activities, which could form part of Accommodation Concern, going forward, (e.g. budgeting courses, financial education, schools work) but these are to be considered further in the future.

Review

This business plan will be reviewed on an annual basis by the management and trustees.



## Appendix 1

Step 1: Risk Identification	Step 2: Risk Assessment		Step 3: Risk Management			Review 21/9/2021	
List of possible Risks	Likelihood H/M/L	Impact H/M/L	Mitigating Actions	What more can be done?	Timescale	Person Responsible	Reviewed level of risk
<b>Financial Risks</b>							
Signatories could spend without legitimate authority	Low	Medium	<ul style="list-style-type: none"> <li>CEO has delegated £3,000 limit</li> <li>Individual payments over this amount and less than £6,000 are to be authorised by the Chairman</li> <li>Individual payments over £6,000 are to be agreed by at least 50% the Board</li> <li>All online payments counter signed</li> <li>Debit card slips scanned to Finance asap after purchase is made</li> </ul>	<ul style="list-style-type: none"> <li>Review financial procedures annually</li> </ul>	By September 2022	CEO Trustees	Low
Petty cash could be stolen/short changes	Low	Medium	<ul style="list-style-type: none"> <li>All staff have their own area petty cash which is reconciled and emptied monthly</li> <li>CEO has master petty cash which is reconciled and sent to finance Trustee every quarter</li> </ul>	<ul style="list-style-type: none"> <li>Review financial procedures annually</li> </ul>	By September 2022	CEO Trustees	Low
Donations/Food/goods could be diverted by staff/volunteers	Low	Medium	<ul style="list-style-type: none"> <li>All donations received are advised to CEO and logged</li> <li>All cash received is given a receipt; copy to manager; cash to locked money box</li> </ul>	<ul style="list-style-type: none"> <li>Review financial procedures annually</li> </ul>	By September 2022	CEO Trustees	Low
Expenses could be fraudulently claimed by staff/volunteers	Low	Medium	<ul style="list-style-type: none"> <li>Expenses claims checked/authorised by Line manager &amp; CEO/Finance Trustee</li> <li>Routes check on google maps</li> <li>Receipt required for purchases</li> </ul>	<ul style="list-style-type: none"> <li>Review financial procedures annually</li> </ul>	By September 2022	CEO Trustees	Low
Banks holding our accounts could become insolvent	Low	High	<ul style="list-style-type: none"> <li>No more than £85,000 in any one bank</li> </ul>	<ul style="list-style-type: none"> <li>Review Regulator advice annually</li> </ul>	By September 2022	CEO Trustees	Low
Contracts/funding ceases	Low	Medium	<ul style="list-style-type: none"> <li>Project management oversight of KPI's being achieved; conditions on funding.</li> <li>Succession planning in plenty of time</li> </ul>	<ul style="list-style-type: none"> <li>6 monthly reviews of contracts</li> <li>Annual reports to funders</li> </ul>	By September 2022	CEO Trustees	Low
Dependency on limited income sources	Medium	High	<ul style="list-style-type: none"> <li>No more than 33% of charity income to be funded by one funder</li> </ul>	<ul style="list-style-type: none"> <li>Finance review at quarterly Trustee meetings</li> </ul>	Quarterly	CEO Trustees	Medium
Poor Pricing for contracts	Medium	High	<ul style="list-style-type: none"> <li>Full cost recovery to be used</li> <li>All proposals double checked by a Trustee before contract signed</li> </ul>	<ul style="list-style-type: none"> <li>Regular budget reports produced to Trustees</li> </ul>	Quarterly	CEO Trustees	Low
Clients fund	Low	Medium	<ul style="list-style-type: none"> <li>Benefits received for clients who don't have a bank account</li> <li>Funds withdrawn same day (if possible) and given to client</li> <li>Receipt signed by client</li> </ul>	<ul style="list-style-type: none"> <li>Set up separate client funds account</li> <li>Support clients to obtain their own bank account</li> </ul>	By September 2022	CEO Trustees	Low

## Appendix 1

Step 1: Risk Identification	Step 2: Risk Assessment		Step 3: Risk Management			Review 21/9/2021	
List of possible Risks	Likelihood H/M/L	Impact H/M/L	Mitigating Actions	What more can be done?	Timescale	Person Responsible	Reviewed level of risk
<b>Operational Risk</b>							
IT failure	Low	High	<ul style="list-style-type: none"> <li>Contract with IT company</li> <li>Off site back up</li> <li>Cloud based systems</li> </ul>	<ul style="list-style-type: none"> <li>Annual review of IT contract</li> </ul>	Annual contract renewal March 2022	CEO	Low
Data breach	Medium	Medium	<ul style="list-style-type: none"> <li>GDPR training for all staff</li> <li>All data stored electronically</li> <li>Password protected data - with regular review/changes</li> <li>Staff to check who sending info to and password protect sensitive items</li> <li>Paper shredded asap once uploaded</li> <li>Any Paper data to be kept in a locked cabinet/drawer. (whilst home working a secure area to be identified)</li> <li>Staff to have lockable bags if required</li> <li>Clear desk policy at night</li> </ul>	<ul style="list-style-type: none"> <li>Annual mandatory staff training to remind of risk (Induction, annual updates)</li> </ul>	By March 2022	CEO	Low
Key/multiple staff are unwell and unable to work	Medium	Medium	<ul style="list-style-type: none"> <li>Ensure all case notes are up to date and uploaded</li> <li>Ensure staff can cover each others roles</li> <li>Ensure access to calendars/diaries to rearrange appointments</li> <li>Make sure master passwords/documents up to date with line manager</li> <li>Staff encouraged to take sick leave if unwell</li> <li>Develop relationship with CAB other agencies that can support if required (temp recruitment agencies as last resort)</li> </ul>	<ul style="list-style-type: none"> <li>Remind staff in supervisions of need to keep diaries/notes up to date</li> <li>Quarterly review of master password log</li> </ul>	Monthly Quarterly	Line manager CEO	Low
Key staff leave the organisation	Low	High	<ul style="list-style-type: none"> <li>Ensure staff are able to cover each others role for leave/sickness cover</li> <li>Processes to recruit swiftly/use agency staff</li> <li>Succession planning in place</li> <li>Handovers required/required to work full notice period</li> </ul>	<ul style="list-style-type: none"> <li>Aware of staff morale/ conditions/emotional resilience</li> </ul>	Ongoing	CEO	Low
Poor staff recruitment/unsuitable/unqualified	Low	High	<ul style="list-style-type: none"> <li>Good quality Induction with regular supervision to identify issues early on regular case work reviews</li> <li>Trustee and Service user on recruitment panels to ensure all aspects considered in safer recruitment process</li> <li>Accurate Job description and Person Spec in place prior to recruitment</li> <li>Robust recruitment policy and procedure in place undertaking relevant checks</li> <li>Solid induction policy and procedure</li> <li>There is a trustee with responsibility and experience for HR</li> </ul>	<ul style="list-style-type: none"> <li>Weekly informal supervisions/1:1's during first few months or if concerns arise</li> </ul>	Weekly as required	Line manager	Low
Unable to open building due to flood/fire/damage/Pandemic	Low	Medium	<ul style="list-style-type: none"> <li>Continuity planning: Agreement to use Open Door Church/Home working</li> <li>All data backed up to the Cloud</li> <li>Remote working set up for all</li> <li>Insurance in place</li> <li>Use of social media to advise clients</li> </ul>	<ul style="list-style-type: none"> <li>Ensure business continuity plan is up to date</li> </ul>	Review 2x per year	CEO	Low

## Appendix 1

Step 1: Risk Identification	Step 2: Risk Assessment		Step 3: Risk Management			Review 21/9/2021	
List of possible Risks	Likelihood H/M/L	Impact H/M/L	Mitigating Actions	What more can be done?	Timescale	Person Responsible	Reviewed level of risk
Regulatory Risk							
Undertaking work that we are not registered to do	Low	High	<ul style="list-style-type: none"><li>Remaining FCA compliant</li><li>All staff aware of limits of advice we can deliver</li></ul>	<ul style="list-style-type: none"><li>Regular case monitoring to ensure we are not delivering advice outside of scope/remit</li></ul>	Review 2x per year	CEO	Low
Undertaking activities that we are not insured to deliver	Low	High	<ul style="list-style-type: none"><li>Risk assessments</li><li>Insurance checked</li><li>Regular staff casework supervision and case audits</li></ul>	<ul style="list-style-type: none"><li>Regular case monitoring to ensure we are not delivering advice outside of scope/remit</li></ul>	Review 2x per year	CEO	Low
Trustees lack skills or commitments	Medium	Medium	<ul style="list-style-type: none"><li>Regular meetings to identify needs</li><li>Encouraged to join staff training</li><li>Encouraged to drop in to the office regularly</li></ul>	<ul style="list-style-type: none"><li>Annual skills audit</li><li>Gap analysis</li><li>Induction process for new trustees</li><li>Targeted recruitment</li></ul>	By end of December 2021 Annual review	CEO Chair of Trustees	Medium
Conflict of Interest	High	Medium	<ul style="list-style-type: none"><li>All aware of Conflict of Interest policy</li><li>First item on all Trustee agendas</li><li>Register of interests completed and maintained</li><li>Staff to also declare any interests. Contract states any other employment needs approval.</li><li>AQS policies and procedures in place to be followed</li></ul>	<ul style="list-style-type: none"><li>Declaration of Interests reviewed annually</li><li>To be included in trustee induction</li><li>Staff appraisals to include a review of potential conflicts and other organisations they are involved with</li></ul>	Every Trustee meeting Staff appraisals	CEO Chair of Trustees	Medium
Safeguarding not managed/ reported correctly	Medium	High	<ul style="list-style-type: none"><li>All staff/volunteers/Trustees to have annual safeguarding training</li></ul>	<ul style="list-style-type: none"><li>Annual review of policy to go to Trustees for approval</li><li>Training log submitted annually to Trustees</li><li>Ongoing supervision</li></ul>	Annual review	CEO Trustees	Medium
Staff/Volunteers/ Trustees speaking to the press on behalf of AC and giving false statements	Low	Medium	<ul style="list-style-type: none"><li>No one to speak to press without agreement from CEO</li><li>Limited access to AC social media accounts</li></ul>	<ul style="list-style-type: none"><li>Nominate press officer role for Trustees</li><li>Update Social media policy</li></ul>	Annual review	CEO Trustees	Low
Changing government/local authority policy/ Unitaries	High	Medium	<ul style="list-style-type: none"><li>Keep up to date on relevant policy changes</li><li>Subscribe to relevant newsletters and news sources</li><li>Networking with other similar organisations to share information</li><li>Working closely with KBC Housing dept</li></ul>	<ul style="list-style-type: none"><li>Follow updates/new releases &amp; Bulletins</li></ul>	Monthly	CEO Trustees	Medium



Accommodation  
Concern

Advice, support and housing  
for a better tomorrow

**By 2024 Accommodation Concern  
will be a leading and sustainable  
housing charity**

## Purpose and values

Prevent and reduce all forms of homelessness and poverty

## Our priorities for 2021-2022

Prevent and reduce all forms of homelessness and poverty

- 1 Maintain a high quality housing, benefit & debt advice service
- 2 Provide high quality supported accommodation housing units
- 3 Prepare for the Local Authority changes in unitary status positioning Accommodation Concern as a lead provider
- 4 Improve sustainability through diversification of income streams
- 5 Develop existing service provision in response to changing operational environment

**We all work hard to support clients to meet their basic  
needs and realise their potential.**

People can rely on us for support, advice, life skills training and practical assistance.





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Advice, support and housing  
for a better tomorrow

## CONTACT

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