



# **Risk Management Policy**

**Clear governance.  
Strong practice.  
Safe services.**



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## **1. Purpose**

D2 PropCo Ltd provides accommodation and property services to people and families experiencing homelessness, including vulnerable adults, care experienced young people and unaccompanied asylum seeking children (UASC). D2 also deliver repairs and maintenance services, meaning our staff and contractors work directly in residents' homes and communities.

Working with vulnerable people, managing property assets and holding sensitive personal information creates a complex risk environment. Effective risk management is essential to ensuring safe, lawful and high quality service delivery. This policy sets out D2's strategic approach to identifying, assessing and managing organisational risk and applies to:

- All employees, directors and volunteers
- Contractors, agents and suppliers acting on behalf of D2
- All services, properties and operational activities
- All information, data and systems used by D2

This policy provides a structured approach for D2 to manage risk proactively, proportionately and transparently, supporting safe decision making, strong governance excellence in service delivery and sustainable organisational growth.

## **2. Legislation & Regulatory Framework**

D2 operates within a complex and evolving legal, regulatory and contractual environment. As a "provider of choice" for Councils and other partners, we must demonstrate that our governance, systems and decision making processes are robust, lawful and defensible. Effective risk management is central to meeting our statutory duties, contractual obligations and ethical responsibilities.

This policy provides the overarching framework that ensures D2 anticipates legal requirements, responds to regulatory change, and maintains the highest standards of compliance across safeguarding, health and safety, data protection, workforce governance and property management. It ensures that risk is not managed in isolation but embedded across all areas of organisational activity.

Risk management is a core requirement of good governance and is essential to meeting our legal, regulatory and contractual responsibilities. D2 operates within a wide legal and regulatory environment.



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This policy supports compliance with:

- Health and Safety at Work Act 1974
- Housing related statutory and contractual duties
- Data protection legislation
- Equality Act 2010
- Human Rights Act 1998
- Safeguarding legislation for adults and children
- Employment law and workforce standards
- Contractual obligations with local authorities and partners

### **3. Risk Management Principles**

D2's approach to risk is grounded in our values and our commitment to delivering safe, high quality services to people experiencing homelessness. We recognise that risk cannot be eliminated, but it can be understood, controlled and used to inform better decision making.

Our principles ensure that risk management is not a reactive process but a proactive, organisation wide discipline that supports safety, accountability and continuous improvement. These principles guide how we think, act and make decisions, from Board level strategy to frontline practice.

Our approach to risk is managed consistently and transparently across all services, properties and partnerships and is guided by the following principles:

- **Safety first** - safeguarding and health & safety risks are never compromised.
- **Proportionality** - risks are assessed and managed in a balanced, evidence based way.
- **Transparency** - risks, decisions and rationales are clearly recorded and communicated.
- **Early identification** - risks are identified and escalated before they become incidents.
- **Learning culture** - we use learning from incidents, complaints and audits to improve.
- **Trauma aware practice** - risk decisions consider the impact of trauma and vulnerability.
- **Data protection** - personal information is handled lawfully, securely and respectfully.
- **Workforce integrity** - staff and contractors act safely, professionally and in line with D2 values
- **Alignment with growth** - ambition is balanced with capacity, capability and safe service delivery.
- **Continuous improvement** - risk management evolves as the organisation grows.



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## **4. Organisational Risk Categories**

D2 faces a broad range of risks due to the nature of our work, the vulnerabilities of the people we support, and the responsibilities we hold as an employer and service provider. To manage these effectively, we group risks into high level categories that reflect the organisation's core functions and statutory duties.

These categories provide a clear structure for our risk registers, assurance processes and Board reporting. They ensure that risks are identified early, assessed consistently and managed in a way that protects residents, staff, contractors and the organisation as a whole. D2 manages risk across several high level domains:

### **4.1 Safeguarding**

Risks relating to harm, abuse, neglect or exploitation of residents, staff or visitors.

### **4.2 Health & Safety**

Risks relating to physical safety, property conditions, repairs, inspections and safe working environments.

### **4.3 Data Protection & Information Governance**

Risks relating to the handling, storage, sharing and security of personal and sensitive information.

### **4.4 Workforce & HR Governance**

Risks relating to safer recruitment, conduct, supervision, capability, wellbeing and contractor workforce standards.

### **4.5 Operational Delivery**

Risks relating to service quality, consistency, capacity, performance and resident experience.

### **4.6 Property Safety & Compliance**

Risks relating to statutory compliance, repairs, maintenance and asset management.

### **4.7 Financial**

Risks relating to financial sustainability, budgeting, fraud, value for money and contractual performance.

### **4.8 Strategic & Growth**

Risks relating to organisational expansion, new business, capacity, capability and alignment of ambition with safe and sensible decision making.

### **4.9 Reputational**

Risks that may impact trust, credibility or confidence in D2 from residents, partners or commissioners.

### **4.10 Contractual & Regulatory Compliance**

Risks relating to meeting legal duties, contract requirements and regulatory expectations.

### **4.11 Business Continuity & Resilience**

Risks relating to disruption, emergencies, system failures or events that impact service delivery.



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## 5. Risk Appetite

Risk appetite defines the level and type of risk D2 is willing to accept in pursuit of its objectives. It provides clarity for decision makers, supports consistent judgement, and ensures that ambition is balanced with safety, capacity and organisational resilience.

As an ambitious and growing organisation, D2 recognises that some level of risk is inherent in innovation, service development and expansion. However, we also recognise that certain risks require a highly cautious approach. Our risk appetite reflects these distinctions and ensures that growth is pursued responsibly, sustainably and in line with our values.

D2's risk appetite reflects our commitment to safety, quality and sustainable growth:

- **Safeguarding and Health & Safety** - zero tolerance for unmanaged or avoidable risk.
- **Data Protection** - very low appetite for breaches or weak information governance.
- **Workforce & HR Governance** - low appetite for conduct, capability or culture related risk.
- **Operational Delivery** - low to moderate appetite where risks are understood and controlled.
- **Financial** - low appetite for financial instability or unsustainable commitments.
- **Strategic & Growth** - moderate appetite for growth where expansion is aligned with capacity, governance and safe service delivery.
- **Innovation** - moderate appetite where innovation improves outcomes and is well managed.

## 6. Risk Identification, Assessment and Escalation

Effective risk management relies on timely identification, accurate assessment and clear escalation routes. D2 uses structured processes to ensure that risks are recognised early, understood in context and responded to proportionately.

This section sets out the high level expectations for how risks are recorded, assessed and escalated across the organisation. It ensures that staff, managers and leaders understand their responsibilities, that risks are not overlooked or minimised, and that the Board receives the assurance it needs to fulfil its governance role. These processes support a culture of openness, learning and continuous improvement.



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D2 uses a structured approach to identifying and managing risk ensures a clear line of sight from frontline practice to Board assurance:

- Risks are recorded in organisational and service level risk registers.
- Risks are assessed using a consistent scoring framework.
- High level risks are escalated to the Senior Management Team and Board.
- New business proposals include risk assessments aligned with this policy.
- Learning from incidents, complaints, audits and resident feedback informs risk controls.
- Risk assessments are updated when circumstances, services or legislation change.

## **7. Roles and Responsibilities**

Risk management is everyone's responsibility, but there are specific responsibilities for the Board, Managing Director, Senior Management Team, managers, staff and contractors. While the Board sets the strategic direction and risk appetite for the D2, effective risk control depends on clear accountability at every level of the organisation.

Identifying specific responsibilities for risk management at all levels of the organisation ensures that everyone understands their role in identifying, reporting and managing risk, and that ensures risk management is embedded in day to day practice, as well as strategic oversight. Clear roles and responsibilities support consistency, transparency and organisational resilience.

### **Board of Directors**

- Sets risk appetite and oversees organisational risk.
- Reviews risk registers, assurance reports and emerging themes.
- Ensures risk management is resourced and embedded across D2.

### **Managing Director**

- Provides strategic leadership for risk management.
- Ensures systems, processes and controls are in place.

### **Senior Management Team**

- Implements this policy and monitors operational risk.
- Ensures risk assessments, audits and quality checks are completed.
- Escalates significant risks to the Board.

### **Managers**

- Identify, record and manage risks within their services.
- Ensure staff understand and follow risk related policies and procedures.



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#### All Staff

- Follow policies, procedures and safe working practices.
- Report risks, incidents and concerns promptly.

#### Contractors and Partners

- Must comply with D2's risk expectations and report concerns immediately.

### **8. Monitoring, Data and Continuous Improvement**

Monitoring risk is essential to understanding how well controls are working, identifying emerging issues and ensuring that learning is embedded across the organisation. D2 uses data, feedback and assurance processes to track trends, evaluate performance and strengthen our approach to risk over time.

This section sets out how D2 monitors risk across services, properties and workforce activity. It ensures that risk management is dynamic rather than static, and that the organisation continually adapts to changes in demand, legislation, service delivery and organisational growth. Monitoring supports accountability, transparency and evidence based decision making. D2 monitors:

- Risk register trends and themes
- Incident and accident data
- Complaints and feedback
- Workforce issues and HR indicators
- Data protection breaches and near misses
- Contractual and compliance performance
- The impact of organisational growth on service quality and safety

### **9. Governance and Accountability**

Strong governance is the foundation of effective risk management. The Board holds ultimate responsibility for ensuring that D2 operates safely, lawfully and in line with its values. This requires clear oversight, reliable assurance and a culture where risks are openly discussed and addressed.

- The Board has overall responsibility for risk management at D2 PropCo
- The Senior Management Team is responsible for implementing this policy and ensuring compliance
- Managers are responsible for embedding risk management in day to day operations
- All staff, contractors and partners must comply with this policy and report risks promptly.



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## 10. Review

This policy will be reviewed annually or sooner if legislation, regulation or organisational needs change.

## 11. Policy Approval & Version Control

<b>Policy Owner:</b>	Managing Director
<b>Approval:</b>	Board
<b>Date:</b>	09/04/2026
<b>Tier:</b>	1 – Core Governance Policy
<b>Review Cycle:</b>	Annual

# Lets Talk

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