

Risk Number	Risk	Business plan assumption	Risk Owner	Risk Type	Pre-mitigation Likelihood (out of 5)	Pre-mitigation Impact (out of 5)	Pre-mitigation Risk Score (out of 25)	Comparison to last report	Mitigation	Post-mitigation Likelihood (out of 5)	Post-mitigation Impact (out of 5)	Post-mitigation Risk Score (out of 25)	Comparison to last report	Risk Status	Comment
4	Business plan rent collection rates are not achieved and bad debt exceeding business plan assumptions. Introduction of universal credit adversely affects rent collection	The business plan assumes a rent collection rate of 98.5% of rent due and 2% bad debt The potential consequences of this risk materialising is the company's income is insufficient to cover its expenditure.	i4B	Financial	4	3	12		Still live issue. However, following, weekly monitoring of rent reports, serving breach of contract notices, and a workshop to formulate an income collection action plan rent collection has improved for 7 consecutive months. It is now 93.01% May 2019. The company is seeking to diversify its products to introduce new customers with different household income profiles than exiting PRS customers. The introduction of new products and some new build properties with higher yields may mitigate a slightly lower rent collection rate. The 2019/20 Business Plan states that rent collection should achieve 95% for the first year and 98% thereafter. The quintain block has an additional risk that the letting period will be lengthened to ensure the brand is maintained and potential customers can be vetted. Properties on schemes should be phased.					Open - Live issue	11/06/18: Risk has materialised into a live issue 14/02/2019: Mitigation amended.
5	Void periods exceed business plan	The business plan assumes 1.5% void loss. The business provides an additional allowance of 90 days for refurbishment following the purchase of a property. The potential consequences of this risk materialising is the company has fewer properties able to receive rent and therefore income would reduce whilst expenditure potentially increases. Additional costs such as council tax costs to the company increase during void periods.	i4B	Financial & achieving operational objectives	2	3	6		i4B has built the requirement to cooperate to ensure void periods are minimised into the contracts with housing management and void contractors. i4B has weekly meetings with the council's housing needs team who are responsible for nominating tenants. i4B is working with the council to ensure purchases are in line with the council's customer profile and sustainable tenancy requirements. i4B will review the nominations agreement at client/company meetings. i4B could approach the shareholder to dispose of properties in locations consistently failing to attract customers. All future properties will be purchased in Brent where there will be high demand.	1	3	3		Open	14/02/19: Mitigation amended. 2019/20 Business Plan outlines plans to purchase more properties in Brent where there is higher demand.
8.1	There is a risk that i4B is deemed to have failed a statutory H&S obligations as a landlord	The SLA places a requirement on the Council to deliver this function, but is unable to transfer the risk of non-compliance with legislation e.g. H&S, gas safety etc. Failure to comply H&S requirements increase the opportunity for hazards including the causing of death. The ultimate penalty for failure to abide by statutory H&S requirements is imprisonment of the Chair of the Board.	i4B	Financial & Reputational	1	5	5		Contracts cover compliance requirements including gas servicing. Only suitably qualified people will be employed to deliver works. Monthly monitoring and KPI reports include some key aspects including gas, complaints and customer satisfaction. BHM Property Services are implementing a new Asset register which will improve ability to monitor / plan compliance activities.	1	5	5		Open	
8.2	There is a risk that i4B is deemed to have failed a statutory requirement in it's corporate role	The company must comply with regulatory and best practice requirements around it's own management and governance such as annual accounts, returns to companies house, and other regulatory bodies such as the Housing Ombudsman. The consequences of other statutory failures may be fines and/or reputational damage to i4B.	i4B	Financial & Reputational	1	5	5		The Board is putting in place suitable policies and procedures in place to ensure regulatory compliance, e.g. escalation policy, schemes of delegation, risk management, internal audit arrangements. Support for company governance is included within the companies' core SLA with the Council.	1	5	5		Open	

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9	The business plan does not diversify its products	The current business plan is primarily based on a Private Rented Sector (PRS) landlord model with permission to provide some market rent. The potential consequences of this risk materialising is the company may find its income and rent collection rate is more vulnerable to impacts of legislation including changes in housing benefit changes.	i4B	Financial & achieving operational objectives	1	2	2		i4B continues to seek to diversify its product range to provide resilience to changes in the rental market. However, the inherent risk within the business plan has been minimised by the 3% increase in LHA rates. The financial plan relating to 300 units does not make any growth assumptions. As the current business is a going concern over 30 years the risks relating to diversification are less critical. Risks such as LHA rates and inflation have been identified elsewhere in the 2019/20 business plan.	1	1	1		Open	14/02/2019: Mitigation amended. In January 2019, financial modelling concluded that the current business is a going concern over 30 years. Hence, risk less critical.
10	The cost to deliver i4B services exceeds business plan assumptions	There are a number of key assumptions built into the business plan and the setting of the Net Yield %. These cost assumptions include: housing management services; repair and maintenance; insurance; contracts and service level agreements; major refurbishment programmes; and debt finance arrangements. As the business grows, cost assumptions may change and new costs may be encountered. For example, Housing Management for 153 Key worker properties may be at a premium. The potential consequences of this risk materialising is the company's expenditure cannot be met by its income.	i4B	Financial	3	3	9		A review of business plan assumptions will take place bi-annually and will be reported to the Board. Should additional costs be noted, options will be considered to reduce cost through contract management renegotiation, eliminating the cost where the minimal property standard can be amended. It would be possible to reduce the volume of units purchased but seek higher gross yield margins on each property. The company is seeking to introduce additional products with higher yields to blend the overall yield, for example some new build partnerships and some shared ownership. Through growth i4B may be able to spread certain costs between more properties and negotiate better prices from providers. There may also be an opportunity to deliver savings through closer alignment to First Wave housing, ultimately combining corporate and other services to create efficiencies. Company budget and spend is reported and monitored at monthly Board meetings to ensure the Company is operating within budget. For the 153 key worker properties, housing management costs will be built into the purchase price. Economies of scale for repairs and housing management should be achieved as the business grows.	2	3	6		Open	14/02/2019: Business Plan assumption and mitigation amended to reflect ambition to purchase 153 key workers units.
11	Interest rates increase impacting on new loans taken out by the Company	30 year loan facility for up to £103.5m at a fixed interest rate of 2.87%. Short term working capital loan facility for up to £3.5m at a fixed interest rate of 3%.	i4B	Financial	4	1	4		The current facilities are for fixed terms and fixed interest rates therefore i4B is not currently exposed to any interest rate risk. i4B will seek to arrange future loan facilities on the same terms whilst interest rates remain low. Should base rates significantly change, i4B will review and revise its growth and financing strategy appropriately having taken the necessary professional advice.	4	1	4		Open	30/05/2018: Risk wording changed to clarify this risk relates to new loans
13	LHA rates fall below business plan assumptions	The business plan assumes LHA rates will be frozen until 2021 and then increase at 1% per annum. The business plan assumes 600 LHA rates and 150 intermediate rents. The potential consequences of this risk materialising is the company's income will be less than its anticipated expenditure.	i4B	Financial	2	4	8		The 3% increase in LHA rates from 2018 and 2019 is well ahead of business plan assumptions, and all other factors being equal, would remain so for several years. The company is seeking to diversify its products to introduce new customers with different household income profiles than exiting PRS / LHA customers. The introduction of new products and some new build properties with higher yields may mitigate any future reductions in LHA rates. Ultimately, properties that could not achieve the expected yield because of the LHA cap / inability to let out under different terms, could be sold to release capital, especially over the medium- and long-term when asset appreciation should create surplus capital.	1	3	3		Open	14/02/2019: Mitigation amended to reflect 2019/20 LHA increases. Risk impact and likelihood reduced.
15	The pipeline of properties is slower than the SLA target	The SLA has a target of 13 weeks for properties to be purchased from approval at the PRS panel. The programme assumes 300 properties purchased by April 2020 and 360 by April 2021. The potential impact of this risk is on i4B's cash-flow; the company pays for the loan facility when it is not being used although this charge increases once funds are drawn down, and rental income is its only source of funding.	i4B	Financial & achieving operational objectives	5	3	15		It was agreed at the June 2018 Board meeting that this risk had materialised into a live issue. The following steps are being taken to manage this issue: i4B intends to offset properties that cannot be achieved through open market purchase by working with the Council and developers to deliver new build properties / block purchase properties. Revisions have been proposed to the SLA target for conveyancing.					Open - Live issue	11/06/18: Risk has materialised into a live issue 14/02/2019: Targets revised with 2019/20 business plan. The Company is set to meet those targets. 10/06/19 Discussions progressing on potential purchases.

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16	Property price inflation reduces average yield and increases average purchase prices	The programme assumes 300 properties purchased by April 2020 and 360 by April 2021. The potential consequences of this risk materialising is the acquisition programme would slow down, reducing the realisation of benefits to the council. However, the company would also be weaker with fewer properties as some fixed costs would be spread between fewer properties. The company's loan facility would continue to incur costs to the company.	i4B	Financial & achieving operational objectives	2	3	6		Difficult to mitigate as limited control of market conditions; continue to monitor closely, and diversify activity as required. However, i4Bs business operates on 300 properties at 1.22% net yield. All new build properties will be expected to achieve between 1.3% and 1.7% net yield. i4B are not obliged to purchase any new build unit under its target new build yield (which should be circa 1.22%)	2	3	6		Open	14/02/2019: Mitigation amended.
17	Due to affordability the demand for the location of properties purchased varies from the business plan	The business plan assumes that: phase 1 – 220 properties purchased in Brent & Greater London, 80 in the Home Counties; phase 2 – up to 60 properties purchased in Brent. If demand for the properties in Brent reduces i4B may have to purchase more Home Counties properties. Properties in Brent have performed better in financially and have been easier to manage.	i4B	Financial & achieving operational objectives	3	3	9		These risks are managed through the yield and ensuring demand is high. The business plan anticipates all new homes will be in Brent and therefore the more challenging out of Brent properties in terms of housing management and rent collection are already purchased and managed within the current risk levels. The scale of growth should act to reduce further the risks associated with out of borough lets.	1	2	2		Open	14/02/2019: Mitigation amended. i4B will not purchase any more Home Counties properties.
18	The refurbishment period exceeds SLA target	The SLA has a target of 70 days for the first 100, 64 days for the 2nd 100 and 56 days for the 3rd 100 units. The potential consequences of this risk materialising is properties are unable to be let and remain void for longer than envisaged. The loan cost will not be met by rental income which will mean cash flow requirements increase and expenditure such as council tax liabilities increase.	i4B	Financial & achieving operational objectives	2	4	8		The Board monitor refurbishment KPIs at their monthly Board meeting. Weekly meetings take place at the operational level between i4B and the council's refurbishment service. Quotes for works are provided to i4B prior to properties being purchased. i4B could encourage the council through the SLA to introduce additional refurbishment teams or processes. The programme of purchases could be slowed to keep pace with refurbishment capacity. Early issues with the Refurbishment process have been addressed and now performance is within the KPI	2	4	8		Open	11/01/2019: Risk likelihood increased from 1 to 2. Although current refurbishment performance is within business plan assumptions, performance is likely to deteriorate. This is due to the reduced pipeline of refurbishment work making it harder for the contractor to mobilise their supply chain.
19	The nominations process exceeds SLA target.	The business plan assumes 90 days for the refurbishment and lettings process. The potential consequences of this risk materialising is properties are unable to be let and remain void for longer than envisaged. The loan cost will not be met by rental income which will mean cash flow requirements increase and expenditure such as council tax liabilities increase. It is likely that the handover of new build schemes will cause challenges as to the number of suitable customers available immediately.	i4B	Financial & achieving operational objectives	4	3	15		The Board monitor nomination KPIs at their monthly Board meeting. Weekly meetings take place at the operational level between i4B and the council's housing needs service. i4B could work to bespoke some properties through a variation to its refurbishment specification. The programme of purchases could be slowed to keep pace with council demand from customers likely to be requiring emergency accommodation. The 2019/20 Business Plan reduces the amount of hard to let Home Counties properties that will be purchased. All remaining properties will be purchased in Brent. Therefore, lettings performance should improve. For new build schemes the company may need to develop alternative short term letting strategies to prevent voids prior to the first letting. The net yield calculator should also anticipate difficulties. Schemes should be managed to provide a steady stream of properties and avoid too many units being handed over at any one time. New approaches required for nominations and lettings teams.	3	3	6		Open	14/02/2019: Risk likelihood reduced. However, the Company will face the future risk of ensuring that the Wembley Park Block is let in an efficient manner.
21	Company cash flow (capital and revenue) is insufficient to manage expenditure	i4B has commenced a large acquisition and refurbishment programme. The 2019/20 Business Plan outlines plans to increase the Company's portfolio to over 700 units in the next few years. The period between purchase and letting requires significant financial resources. The business plan assumes an average of 90 days for property refurbishment and letting from the point of purchase. i4B's revenue account also requires an element of cash flow support to manage expenditure until it creates a surplus through rent. The potential consequences of this risk materialising is the company becomes insolvent.	i4B	Financial	3	5	15		i4B is monitoring SLA performance to deliver capital works and refurbishments within business plan requirements. i4B is focusing on reducing the amount of time taken during refurbishment and letting to maximise rental income. The Council has approved a cash flow facility of up to £4m and modelling is being undertaken to assess if this will be sufficient to meet i4B working capital requirements. i4B will monitor cash flow requirements at its monthly meetings and with the shareholder at client/company meetings. The Shareholder has increased the cash flow facility to £4 million because Company losses have been forecasted to be higher than originally anticipated.	2	5	10		Open	14/01/2019: Business Plan assumption amended to reflect growth ambitions. Mitigation amended to reflect increased cash flow facility.

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23	There is a risk that the demand increases for the types of properties that are financially less viable for i4B (e.g. large family properties in expensive areas in Brent)	The average property price for PRS phase 1 is £363,333 and the average purchase price for PRS phase 2 is £400,000. 1.1% net yield. Changes in demand could cause conflict between the companies' need to deliver on the Council's objectives, and the financial viability of it's business plan	i4B	Financial	1	4	4		Current demand is spread across lots of different property types, so it has been possible to tweak the mix of properties purchased to maintain average yield (e.g. purchasing increased numbers of 2 beds in Brent, which offer better yields than larger properties). Quarterly meetings have been initiated to monitor future demand and provide an early warning of this risk materialising.	1	4	4		Open	11/06/18: New risk added
24	There is a risk that there is a permanent downward adjustment of house prices		i4B	Financial	2	4	8		Difficult to mitigate as limited control of market conditions; continue to monitor closely.	2	4	8		Open	
26.1	There is a risk of Fraud to the company	Set up of invalid/fictitious suppliers by staff for personal gain. Invalid amendments to supplier bank details to divert payments, either by external parties making fraudulent requests or by staff making amendments for personal gain. Payments to third parties for goods/services not received.	i4B	Fraud	2	3	6		Payments from i4B's account are made through the council's payment system and as such are subject to the Council's policies and procedures. i4B currently only makes payments to the council through the council's payment system. i4B's Scheme of Delegation states that any purchases or contracts of over £50,000 from the Company's funds requires the signatures of at least two of the Company's Directors.	1	3	3		Open	11/01/19: Mitigation amended
26.2	There is a risk of Fraud to the company	Diversion of tenant rent payments by staff. Collusion between tenants and staff to write off rent arrears. Deliberate overpayment of rent by tenants using proceeds of crime and then requesting a refund.	i4B	Fraud	2	3	6		A 'Rent Collection and Arrears Management' policy is being drafted which will outline i4B's approval procedure for rent arrears right-off. This will include both board and shareholder approval. PRS programme manager receives weekly rent reports from housing management providers which detail if any refunds on rent overpayment have been given. To date, no refunds on rent overpayments have been given.	1	3	3		Open	11/01/19: Mitigation amended
26.3	There is a risk of Fraud to the company	Subletting of properties by tenants. Letting of properties by Council or maintenance staff for personal gain during a void period. Collusion between staff/ board members and buyers to dispose of properties at under market value. Undeclared conflicts of interest between staff/board members and buyers.	i4B	Fraud	2	3	6		Property void times will be reported to the board to work to keep void periods low. BHM will prioritise regular visits to higher risk properties. High risk properties will be defined by intelligence from the Council's Audit and Investigation department. The board will be provided with detailed reporting on void checks undertaken by BHM. i4B will develop an Assets Disposal Policy to outline the process for the disposal of Company assets. This will consider the Council's checks and valuations, and will incorporate board and shareholder approval. The policy will be submitted to the shareholder for approval.	1	3	3		Open	New risk added after Fraud Risk Assessment approved at October Board.
26.4	There is a risk of Fraud to the company	Collusion between staff/board members and estate agents in relation to finder fees and commissions. Collusion between staff/board members and vendors to inflate purchase prices and share the additional amount. Staff making payments for fictitious property purchases to themselves. Repairs/maintenance/major works – overcharging or charging for fictitious works.	i4B	Fraud	2	2	4		All properties purchased by i4B receive Delegated Authority approval in accordance with the Company's Scheme of Delegation. This is documented on i4B's Microsoft Dynamics case management system. The criteria for property purchase is pre-set by the Company's net yield calculator. Brent Staff acting on behalf of i4B are governed by the Council's Code of Conduct and their work is regularly assessed through internal management checks and processes. BHM will implement a post inspection regime to ensure that the repair and major works completed comply with what is being paid for. A review will be undertaken into a property when it receives more than 7 repairs in a 12 month period. The average cost per repair per property will be reported regularly to the board. Single repairs over £199 and double repairs over £299 are approved by i4B's programme manager.	1	2	2		Open	New risk added after Fraud Risk Assessment approved at October Board.
26.5	There is a risk of Fraud to the company	Falsification of financial position by i4B to secure additional Council funding. Nepotism in procurement processes, including bribery. Invalid or overly ostentatious expenses, for example for entertainment purposes. Facilitation of income tax avoidance.	i4B	Fraud	2	3	6		Regular Shareholder review meetings take place between i4B and the shareholder. i4B is reviewed twice a year at the Council's Audit and Standards Advisory Committee. Board member expenses are governed by council policy and procedures. All board members are required to declare their interests at monthly board meetings and have signed a Board Code of Conduct.	1	3	3		Open	New risk added after Fraud Risk Assessment approved at October Board.

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26.60	Contractor inflating or falsifying development costs, resulting in i4B's portion of expenditure being increased.	N/A - potential future business activity.	i4B	Fraud					To be reviewed when activity undertaken.						
26.7	Collusion between staff/board members/agents and vendors to inflate purchase prices and share the additional amount. False representation by vendors in relation to land ownership or suitability for development. Organisations misrepresenting their financial viability/performance to make them more attractive as an acquisition.	N/A - potential future business activity.	i4B	Fraud					To be reviewed when activity undertaken.						
27	The Council's build costs increase	The Company plans to purchase 270 properties from the Council. These properties will be higher yielding and improve the financial strength of the Company. If build costs increase for the Council these may be passed on to i4B thus reducing yield.	i4B	Financial	3	4	12		be able to achieve net build targets on average circa 1.5%. i4B are not required to purchase properties which do not fulfil their criteria.	2	3	6		Open	14/02/2019: New risk added.