



**Cabinet**  
9 March 2026

**Report from the Chair of First Wave Housing Ltd**

**Lead Member – Cabinet Member for Housing  
(Councillor Fleur Donnelly-Jackson)**

**First Wave Housing Business Plan 2026/27**

<b>Wards Affected:</b>	All
<b>Key or Non-Key Decision:</b>	Key Decision
<b>Open or Part/Fully Exempt:</b> (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Part exempt – Appendix 1a (including Annexes 1-3) the Financial Appendix to the Business Plan, is exempt as it contains the following category of exempt information as specified in Paragraph 3, Schedule 12A of the Local Government Act 1972, namely: “Information relating to the financial or business affairs of any particular person (including the authority holding that information)”
<b>List of Appendices:</b>	<p>Four</p> <p>Appendix 1: FWH 2026/27 Company Business Plan</p> <p>Appendix 1(a): (Exempt)FWH Financial Business Plan Summary (including Annexes 1-3)</p> <p>Appendix 2: FWH Risk Register</p> <p>Appendix 3: FWH Progress on 2025-26 Business Plan Priorities</p> <p>Appendix 4: FWH 2026/27 Service Level Agreement</p> <p>Appendix 4(a): FWH 2026-27 Service Level Agreement Schedule</p>
<b>Background Papers:</b>	None
<b>Contact Officer(s):</b> (Name, Title, Contact Details)	<p>Natoyah Vincent, Strategy and Delivery Manager <a href="mailto:Natoyah.Vincent@brent.gov.uk">Natoyah.Vincent@brent.gov.uk</a></p> <p>Jon Cartwright, Head of Change and Customer Insight Tel: 020 8937 1742 <a href="mailto:Jonathan.Cartwright@brent.gov.uk">Jonathan.Cartwright@brent.gov.uk</a></p>

## **1.0 Executive Summary**

1.1 This report provides Cabinet with a final draft of the First Wave Housing Ltd (FWH) 2026/27 Business Plan and revised Service Level Agreement with Brent Council. Cabinet is asked to approve the Business Plan and Service Level Agreement on behalf of the Council as Guarantor of First Wave Housing.

## **2.0 Recommendation(s)**

2.1 Cabinet approves the 2026-27 First Wave Housing Ltd Business Plan and financial model as Guarantor of the Company.

2.2 Cabinet approves the 2026-27 Service Level Agreement between First Wave Housing Ltd and the Council, and

2.3 Cabinet agrees to delegate authority for the Corporate Director of Finance and Resources to agree the terms for the enforcement of key performance indicators in relevant SLAs to allow the FWH Board to implement.

## **3.0 Detail**

### **3.1 Cabinet Member Foreword**

3.1.1 This business plan sets out FWH's strategy for the coming financial year, furthering the company's work to increase the supply of good quality affordable housing, reducing homelessness in the borough and alleviating the use of costly Temporary Accommodation. This supports the Brent Borough Plan 2023-2027 strategic priority of 'Prosperity and Stability in Brent: Safe, Secure and Decent Housing'.

### **3.2 Background**

3.2.1 FWH is a housing company wholly owned by the London Borough of Brent. FWH is limited by guarantee. FWH manages a total of 216 properties. Of these properties, 166 are settled homes, 45 are market rented and 5 are general needs. The annual rent figure is £3,713.360.

3.2.2 As a registered provider of social housing, FWH is required to produce an annual business plan.

3.2.3 This report provides a final draft version of FWH's Business Plan for 2026/27. The draft plan was presented to the FWH Board on the 22<sup>nd</sup> January 2026, the Company Guarantor on the 6<sup>th</sup> February 2026, senior officers on 11<sup>th</sup> February 2026 and senior officers and members on 18<sup>th</sup> February 2026. Feedback from these meetings has been incorporated into this final draft.

## **4.0 Update on Operational Performance**

4.1 Table One below provides a summary of operational performance at December 2025. FWH has not purchased any new properties, therefore performance is based on housing management. FWH's overall performance is reasonable, although void times continue to be an issue and repairs performance is below target. The Company continues to provide a good housing service to residents and rent collection performance is strong.

4.2 FWH has achieved full health and safety compliance in the relevant areas, except for a few outstanding electrical safety certificates. The legal process to gain access to carry out continues to be followed for each outstanding certificate; however, it is not possible to force entry to properties that refuse access, as is the case with gas certificates.

Table One – Key Performance Indicators

Indicator	Target	Performance at January 2025 (YTD)	Performance at December 2025 (YTD)	Trend
Minor void re-let times	35 days	243 days	154 days	↑
Major void re-let times	72 days	246 days	171 days	↑
Rent collection	98.50%	92.9%	93.75%	↑
Emergency repairs completed within 24 hours	100%	100%	100%	↔
Urgent repairs completed within 7 days	95%	99%	99%	↔
Routine repairs completed within 28 days	95%	89%	90%	↑

*\*Data does not include void properties*

## 5.0 Progress in Implementing 2025/26 Business Plan

5.1 In March 2025, the 2025/26 FWH Business Plan was approved. The plan outlined the following as the Company's medium- to long-term objectives:

- Delivering safe and sustainable homes
- Increasing the supply of affordable housing in the borough
- Running a viable business
- Providing a consistently good housing service

5.2 The following summarises each of the priorities and reports on progress against these.

### 5.3 Delivering safe and sustainable homes

5.3.1. FWH manages its health and safety compliance arrangements through its Service Level Agreement with Brent Housing Service. Brent's Housing Management Service (HMS) use the True Compliance system for long-term monitoring and reporting of compliance across all areas. FWH will continue to monitor health and safety compliance with bi-annual reporting to the Board.

5.3.2. The Housing Companies are focussed on ensuring that our housing stock not only meets current safety standards but also aligns with future sustainability goals. Addressing disrepair is a key priority, and we have taken proactive measures to identify and rectify potential issues early on. This approach is critical in safeguarding the health and wellbeing of our tenants.

5.3.3. Furthermore, FWH have developed an asset management strategy. A significant focus of this strategy is improving the energy performance of our housing stock, with the goal of bringing all properties up to a minimum EPC C rating, to achieve the government's 2030 target. This initiative is essential for both maintaining the value and quality of assets and supporting broader sustainability objectives and is expected to bring health and financial benefits to tenants.

### 5.4 Increasing the supply of affordable housing in the borough

5.4.1. FWH is one of several funding and delivery routes the Council has to increase the amount of affordable housing in the borough. FWH remains available as an RP to support the Council's affordable housing aspirations.

### 5.5 Running a Viable Business

5.5.1. The FWH Business Plan monitors and assures the ongoing financial viability of the Company. The key operational issue for FWH continues to be high void times.

5.5.2 Although void performance remains outside target, the reduction in major void turnaround time indicates performance is on the correct trajectory. A sustained and collective effort will be required to clear any legacy voids and bring overall void times closer to target. Officers are confident that positive change is underway and the Board will continue to monitor progress closely.

5.5.3 Another key concern for FWH is value for money. A value for money strategy for FWH was approved by the Board in October 2024 and will continue to be implemented during the 2026-27 financial year.

### 5.6 Providing a consistently good housing service

5.6.1. FWH is committed to improving tenant satisfaction. Unfortunately, the latest results are currently below the London 4th quartile, which is a significant concern. This performance does not meet the expected standards and highlights the urgent need for improvement in this area. To address these issues, FWH is implementing an improvement plan in collaboration with the Quality Assurance and Standards Manager. This plan focuses on making tangible changes to enhance tenant experiences. Regular monitoring and collaborative efforts are key components of this strategy.

## **6.0 2026/27 Business Plan**

6.1 Appendix 1 contains a final draft of the Company's 2026/27 Business Plan. Cabinet is asked to approve the business plan.

6.2 The 2026/27 Business Plan outlines the Company's strategic priorities for the year. Priorities for 2026/27 are set out within the framework of the medium to long-term objectives of Brent's Housing Companies. These objectives are:

- Providing a consistently good housing service.
- Delivering safe and sustainable homes.
- Running a viable business; and
- Increasing the supply of affordable housing in the borough

### **6.3 Providing a Consistently Good Housing Service**

6.3.1. This objective relates to improving tenant satisfaction and ensuring tenants are able to afford their rent and sustain their tenancies. In order to provide an effective and consistent housing service, FWH will continue to review responses to the Regulator's tenant satisfaction measures, seek to improve its oversight of complaints handling, and continue to actively engage with its tenants on financial inclusion and affordability. The 2026-27 strategic priorities for this objective are:

- Priority 1: Prioritise tenant voice
- Priority 2: Improve income collection performance

### **6.4 Delivering Safe and Sustainable Homes**

6.4.1. This objective involves ensuring that FWH's homes are of a good quality, safe, legally compliant, and environmentally sustainable. In 2026-27, the Company's focus will be on further embedding improved practices in the areas of compliance, disrepair and asset management & energy efficiency. This will include meeting all requirements of the Building Safety Act and carrying out additional work on modelling & planning for future property management and decarbonisation works. The 2026-27 strategic priorities that relate to this objective are:

- Priority 3: Implement asset management & decarbonisation strategy
- Priority 4: Maintain health and safety compliance

## 6.5 Running a Viable Business

6.5.1. This objective relates to improving the operational and financial performance of FWH in order to remain financially viable and thus continue to bring benefits to the Council. The Company's focus for 2026-27 will be on reducing costs and strengthening financial performance, with a particular focus on voids performance and financial controls with a focus on benchmarking against the council and similar sized organisations with an aim of getting performance in line with the upper quartile. The 2026-27 strategic priorities that relate to this objective are:

- Priority 5: Continue to drive improvements around voids performance
- Priority 6: Improve rent collection
- Priority 7: Explore financial contributions

## 6.6 Increasing the Supply of Affordable Housing in the Borough

6.6.1. As a registered provider (RP), FWH remains available for any opportunities that supports the Council's affordable housing targets. Given its status as an RP, FWH is able to act in ways the Council cannot, for example letting properties at market and affordable rates, and accessing certain grants. The Company's focus will be to continue identifying and appraising block acquisitions, new build purchases and engage the Council on the future of the company through the implementation of housing programmes such as GLA grant schemes. The strategic priorities for this objective in 2026-27 are:

- Priority 8: Identify and appraise potential acquisitions
- Priority 9: Pilot the provision of Supported Exempt Accommodation (SEA)
- Priority 10: Continue to seek the best strategy to ease Council pressures and deliver unique opportunities

## 7.0 **2026-27 Service Level Agreement**

7.1 FWH has worked with service area leads to review and update its Service Level Agreement (SLA) with the Council for the provision of services including operational and financial support, legal and internal audit services, and all housing management services. Following feedback from the Guarantor, FWH will explore introducing financial penalties for underperformance against agreed KPI's. The detailed arrangements are currently being developed by the Board, Legal, and relevant SLA leads, with the intention of implementing the new provisions by Q2 of 2026/27.

7.2 The schedule is contained in Appendix 4. This outlines the services provided to FWH, service standards, and management costs. The SLA will run throughout 2026/27 and will be reviewed again for 2027/28. All costs and service standards have been agreed between the relevant Council heads of service and FWH.

7.3 Cabinet is asked to approve the updated SLA and to agree delegated authority for the Corporate Director of Finance and Resources to agree the terms for enforcing key performance indicators within the relevant SLAs, enabling the i4B/FWH Board to implement the changes.

## **8.0 Stakeholder and ward member consultation and engagement**

8.1 N/A

## **9.0 Financial Considerations**

9.1 The detailed financial implications are set out in the business plan. These include the key assumptions used.

9.2 Over the year, inflation has risen from 1.7% in 2024 to 3.8% in September 2025 which impacts costs and income. Rental increase caps are at the standard policy of CPI + 1% at September 2025 and the LHA rate has remained the same as 2025/26 as there has been no increase agreed by the government.

9.3 In summary, rental income has increased over the life of the business plan, expenditure has decreased than previously forecasted which has increased revenue surpluses over the life of the plan. The cash position of FWH remains positive throughout the plan with a higher balance than previously forecast.

## **10.0 Legal Considerations**

10.1 FWH is a wholly owned local authority company, controlled by the Council, established in order to support the Council's homelessness agenda, by owning and managing housing stock previously held by Brent Housing Partnership. FWH is a company limited by guarantee.

10.2 The adoption of the proposed Business Plan is a matter reserved to the Council as the sole Guarantor in FWH and the intention is to seek Cabinet approval on 9<sup>h</sup> March 2026. In addition to being a local authority company, FWH is a registered provider subject to regulation by the Social Housing Regulator.

10.3 Local Housing Allowance rates (LHA) apply to private rented sector rather than to the social housing sector. FWH needs to ensure that the levels of "eligible rent" charged by FWH do not fall outside the scope of the statutory Rent Standard set by the Social Housing Regulator, for properties let from April 2020. This is not necessary if the relevant property is exempt from the Rent Standard.

10.4 Wholly-owned local authority companies such as FWH, established and solely owned by a Council Parent, will be regarded as "contracting authorities" in their

own right, for the purposes of the Procurement Act 2023. This means that unless relevant Procurement Act 2023 exemptions apply any services or works that FWH commissions from another organisation will have to be competitively tendered on the open market if the total value is above the relevant Procurement Act 2023 threshold.

- 10.5 The Building Safety Act 2022, sets out a number of provisions which requires FWH as a Landlord to comply with various safety standards to its buildings. In order to comply with the Building Safety Act, FWH has to give consideration to who will act as the Principal Accountable Person (“PAP”). The PAP will have a range of legal duties to ensure buildings are safe from a fire and building safety perspective. These duties cannot be delegated to others, but the PAP may employ a managing agent to carry out some or all of those duties on behalf of the PAP.
- 10.6 As a landlord, FWH is under a statutory obligation to carry out repair works in respect of properties it lets out to its assured tenants. Under section 11 of the Landlord and Tenant Act 1985, it has a duty to keep in repair and proper working order the structure and the exterior of the residential properties it owns as well as certain installations for the supply of water, gas, and electricity.
- 10.7 The Social Housing Regulation Act 2023 lays foundations for changes to how social housing is managed. It includes increased regulation of social landlords and new rules for protecting tenants from serious hazards in their homes. There are a number of provisions to enhance the powers of both tenants and the Regulator of Social Housing.
- 10.8 The effect of the Fire Safety Act 2021 is to require fire risk assessments of buildings with two or more sets of domestic premises to be updated to take account of structure, external walls and doors, if they have not already done so - the Fire Safety Act 2021 amends The Regulatory Reform (Fire Safety) Order 2005 to bring this into effect. Failure to comply with fire safety regulations can lead to enforcement action against FWH by the London Fire Brigade.
- 10.9 The Fire Safety (England) Regulations 2022, which implement most of the Grenfell Tower Inquiry recommendations, requires ‘responsible persons’ of mid and high-rise blocks of flats to provide information to fire and rescue services to “assist them with operational planning and provide additional safety measures”. All multi-occupied residential buildings, residents should now be provided with fire safety instructions and information on fire doors.
- 10.8 FWH housing has properties that are let out on Assured and also Assured Shorthold Tenancies. In relation to Assured Shorthold Tenancies The Renters’ Rights Act, effective from May 1, 2026, abolishes Fixed-term Tenancies and standardises periodic tenancies. Alongside this, it introduces new rules on possession, notice periods, and rent increases.

## **11.0 Equity, Diversity & Inclusion (EDI) Considerations**

11.1 N/A

## **12.0 Climate Change and Environmental Considerations**

12.1 N/A

**13.0 Human Resources/Property Considerations (if appropriate)**

13.1 N/A

**14.0 Communication Considerations**

14.1 N/A

**Report sign off:**

***Rachel Crossley***

Corporate Director of Service Reform and Strategy