



**Resources and Public Realm
Scrutiny Committee**
4 September 2024

**Report from the Chair of i4B
Holdings Ltd and First Wave
Housing Ltd**

**Lead Cabinet Member - Cabinet
Member for Regeneration, Planning
& Growth
(Councillor Shama Tatler)**

Delivery of Affordable Housing by i4B Holdings Ltd and First Wave Housing Ltd

Wards Affected:	All
Key or Non-Key Decision:	Not Applicable
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
List of Appendices:	Four Appendix 1: i4B 2023/24 Key Tasks Summary Appendix 2: i4B 2024/25 Key Tasks (Q1 update) Appendix 3: FWH 2023/24 Key Tasks Summary Appendix 4: FWH 2024/25 Key Tasks (Q1 update)
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Alice Lester Corporate Director, Neighbourhoods & Regeneration Tel: 020 8937 6441 Email: Alice.Lester@brent.gov.uk

1.0 Purpose of the Report

- 1.1. This is a report providing an update on i4B Holdings Ltd (i4B) and First Wave Housing Ltd.'s (FWH) operational, financial, and strategic performance. This will include providing an update on the delivery of the policy objectives of providing good quality affordable housing and reducing the use of temporary accommodation.
- 1.2. The report has been produced to assist the Committee in seeking to understand and assess whether i4B and FWH have made effective investment decisions for the Council in achieving key strategic priorities.

2.0 Recommendation(s)

- 2.1 That the Resources & Public Realm Scrutiny Committee note the report and provide feedback as to whether the companies are making effective decisions to help the Council achieve key strategic priorities.

3.0 Context and Background Information

3.1 i4B

- 3.1.1 i4B the Council's wholly owned local authority company, was set up in 2016 with the purpose of acquiring, letting, and managing a portfolio of affordable, good quality private rented sector (PRS) properties. Properties would be let to homeless families at Local Housing Allowance (LHA) levels. This would enable the Council to either prevent or discharge its homelessness duty and therefore reduce temporary accommodation (TA) costs.
- 3.1.2 The Company has a Board of Directors that meet on a monthly basis to discuss company performance. The Board of the Company is chaired by independent voting Director Andrew Hudson. The other directors of the Company are:
- Independent board member Akintoye Durowoju;
 - Councillor Saqib Butt;
 - Dr Melanie Smith, the Director of Public Health; and
 - Peter Gadsdon, the Corporate Director of Partnerships, Housing and Resident Services.
- 3.1.3 The Company has a Service Level Agreement (SLA) with Brent Council to provide a range of services to support the Company's operations, including:
- Corporate and Financial services;
 - Property purchasing and refurbishment;
 - Housing management.
- 3.1.4 The SLA enables the Company to operate with minimal staff and to benefit from economies of scale in its operating costs. Across the Council, there are a number of Council officers involved in the end-to-end processes of the Company, from the property negotiation and purchase to the property refurbishment, tenancy nominations and lettings, and the subsequent management of the property once it is let.
- 3.1.5 To ensure that operational performance meets the targets set out in the SLAs, i4B have implemented a comprehensive monitoring framework. The Board receives a bi-monthly performance report accompanied by a monthly scorecard that details both month-to-date and year-to-date performance against targets, allowing for close oversight. Additionally, the companies' officers hold monthly SLA meetings with the council and Mears to address any areas of concern or underperformance. To further reinforce this, i4B officers conduct fortnightly conveyancing and voids meetings, weekly panel meetings with property buyers and a separate fortnightly meeting with Housing Companies Operational Manager. These regular meetings provide

opportunities to discuss specific cases or challenges and maintain high standards of service delivery.

3.1.6 In addition to this, i4B has a contract with external managing agent Mears for the management of its 75 properties in the Home Counties. As with the Brent SLA, this includes all aspects of housing and property management including rent collection, repairs, void refurbishment works, etc.

3.2 FWH

3.2.1 First Wave Housing Limited ('FWH'), formerly Brent Housing Partnership ('BHP') is a local authority owned company of the London Borough of Brent and is limited by guarantee. The Company is a registered provider of social housing. It was established in 2002 to manage the property portfolio previously owned by Brent's (now dissolved) arm's length management organisation ("ALMO"), Brent Housing Partnership.

3.2.2 FWH currently owns 216 street properties and one commercial unit. The street properties are categorised as follows:

- 166 Settled Homes - These properties were purchased with a grant providing the tenants with protected rights including the right to buy their home. These acquisitions took place in the early 2010s under FWH's former name, Brent Housing Partnership and a previous approach to acquisitions. Settled Homes are a form of long-term temporary accommodation. They are let on assured shorthold tenancies at the lower of the LHA rate and the affordable rent (80% of market rent). When business plan surpluses are sufficient, properties will be converted, on an incremental basis, to affordable rents on assured tenancies.
- 45 Market Rented - When market rented properties become void, they are let at LHA levels to households through a nomination agreement between the Council and FWH. This helps assist the Council's homelessness reduction agenda.
- 5 General Needs - These tenancies are Assured Shorthold Tenancy Agreements with rents protected at social rent levels, which are below 50% of market rent. FWH has five new build social rented houses.

3.2.3 The Company has the same Board of Directors as i4B which meets monthly.

3.2.4 Like i4B, FWH has a Service Level Agreement (SLA) with the Council to support the Company's operations. Under the SLA, the Council provides corporate services such as governance, financial, and legal services. The Council's Housing Management Service (HMS) provides FWH with services to support the Company's landlord function such as housing management, repairs, and void management.

4.0 Performance against Overall Aims/Purpose

4.1 i4B has increased the amount of affordable housing tenures in Brent and the Home Counties.

4.2 As of July 2024, 446 properties have been purchased to be let at affordable rates. Economic conditions meant the company had to pause acquisitions in 2022 but was able to recommence purchases in June 2023 and acquired 16 properties in that year. The Company has a financial model that guides all acquisitions, including strict criteria to ensure that loan repayments can be met in a timely manner. This ensures that property purchases are viable, and the Company is able to meet future financial commitments. The financial model is regularly reviewed to ensure its appropriateness and therefore the Company's ongoing financial viability. Properties have been refurbished to a high standard.

4.3 Table One provides a breakdown of i4B's portfolio.

Table One – i4B portfolio as of July 2024

	1 Bed	2 Bed	3 Bed	4 Bed+	Total
Purchased Properties	61	191	141	53	446

4.4 i4B has housed and discharged the Council's housing duty to 473 families and 1075 children. The majority of these families were previously housed in stage one TA. The number of families housed is higher than i4B's PRS portfolio due to a number of families moving on to other accommodation, with new families moving in.

Table Two – Breakdown of families accommodated by i4B as of July 2024

Previous Accommodation	No. of Families	No. of Children
Direct to i4B	116	216
Women's Refuge	2	15
TA Stage One – B&B	316	724
TA Stage Two - Leased	39	120
Total	473	1075

4.5 i4B has been housing Council homelessness nominees since 2016. Although the number of households on the waiting list has increased substantially between 2016 and 2024, the figures would be significantly higher without the company's involvement.

4.6 At the end of July 2024, there were 1884 Brent households in temporary accommodation; this figure includes 3194 children. Without the 415 households currently occupying i4B properties, the number of households in temporary accommodation would be significantly higher. Not all of i4B's properties are currently occupied, due to a combination of recently acquired

and vacated properties being in refurbishment or ready to be re-let, at which point more families will be able to come off the waiting list.

- 4.7 Based on the current highest cost B&B providers, a net cost avoidance of £88k each week has been achieved by moving the 355 households from Temporary Accommodation into i4B units. This assumes that there is a nil cost or surplus to the i4B units as rents received are used to pay any loan repayments and refurbishment costs. Any surplus rents are used to invest into new supply.

Provider Name	Room Size	Highest Nightly Rate (£)	Households moved from TA to i4B units	Gross weekly cost incurred by council if those households were still in TA	South Brent BRMA Jan 2011 LHA - 10% * Households	Net cost avoidance per week
LHG	Single	55	53	£20,405.00	£12,402.00	£8,003.00
National Housing Group	Double	65	151	£68,705.00	£46,206.00	£22,499.00
Buckingham Hotel	Triple	100	106	£74,200.00	£42,930.00	£31,270.00
	Quad	150	45	£47,250.00	£20,700.00	£26,550.00
						£88,322.00

- 4.8 i4B also owns a 153-unit block, which is let to public sector key workers; Lexington has now been operational for three years and is fully occupied with a small amount of turnover due to re-lets. This provides sub-market rent homes to a mix of staff from Brent and other local authorities, NHS, schools and emergency services, who are able to remain there as long as they satisfy the eligibility criteria. Rental rates are capped at 65% of market rent, although current rents are closer to 50% of market rent.

- 4.9 Similarly to i4B, FWH brings a greater diversity and flexibility to the delivery of the Council's housing objectives. As a Registered Provider, FWH has the opportunity to access grant funding through the Greater London Authority and remains available for such opportunities, e.g. if the new government makes further or new forms of grant funding available. In addition, as the Company is not restrained by rent caps within the Council's Housing Revenue Account, it has the ability to charge a variety of rental products as outlined in 3.2.2; this allows the company to set higher rents for certain properties and tenants who can afford these, which strengthens the business, allows the company to do more for other tenants and fosters greater confidence in future investments.

5.0 Progress against the Companies' 2023/24 Business Plans

- 5.1 The Appendices to this report show the key objectives and tasks within the i4B and FWH annual business plans for 2023-24 and 2024-25. These provide detailed updates on the progress of tasks within the previous financial year, and in this financial year so far. The companies' four strategic objectives are:

- Providing a consistently good housing service
- Delivering safe and sustainable homes
- Running a viable business

- Increasing the supply of affordable housing in the borough

5.2 More detail on progress against each strategic priority will be provided in the section below.

6.0 Strategic Priorities for 2024/25

6.1 The 2024/25 Business Plans for i4B and FWH are now in operation. To accompany the appendices, this section provides a detailed update on progress of business plan tasks throughout 2023-24 and in 2024-25 so far.

6.2 Operational performance is generally stable with the main focus for performance improvements being void turnaround times and rent collection. As noted, the majority of housing management is carried out by Brent Council's Housing Service via the SLA or by Mears, while the Board of i4B have a responsibility to monitor and drive good performance and do so on an ongoing basis including via monthly performance reports.

6.3 Providing a consistently good housing service

6.3.1 This objective relates to improving tenant satisfaction, ensuring tenants are able to afford their rent and sustain their tenancies, and overall providing an effective and consistent housing service.

6.3.2 During 2023/24, new tenant satisfaction measures were implemented some transactional feedback from tenants was received. While the initial results were in line with Council benchmarks, they fell short of the levels we would have liked to achieve. The companies are actively working to improve these outcomes with regular monitoring and collaborative work with the Quality Assurance and Standards Manager to implement an improvement plan that focuses on making tangible changes to enhance tenant experiences. One of the key initiatives is the development of more robust complaints reporting to better identify recurring themes and areas for improvement, with the company specific reporting set to begin in October 2024.

6.3.3 The Housing Companies Tenant Services Managers are also increasing their contact with tenants through more frequent phone communications, as well as conducting home and estate visits. These efforts will build stronger relationships with tenants and ensure that any concerns are promptly addressed.

6.3.4 Additionally, i4B are in the process of re-tendering the Home Counties contract, with a focus on refining the contract specifications and management arrangements. These improvements are intended to enhance the quality and efficiency of the services provided, ensuring that our housing operations consistently meet the needs and expectations of our tenants.

6.4 Delivering safe and sustainable homes

- 6.4.1 This objective involves ensuring that homes are of a good quality, safe, legally compliant, and environmentally sustainable.
- 6.4.2 During 2022-23, i4B and FWH commissioned an audit of its health and safety compliance arrangements, managed primarily through its Service Level Agreement with Brent Housing Service. The audit identified potential risks to health and safety compliance including a lack of detailed oversight, and in response, a monitoring tracker was created to track all compliance elements for all street properties and blocks. Brent's Housing Management Service (HMS) have adopted the True Compliance system for long-term monitoring and reporting of compliance across all areas.
- 6.4.3 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.
- 6.4.4 In response to the Building Safety Act 2022, i4B have prepared a comprehensive building safety case for Lexington; a higher risk building over 7 storeys. This ensures that we are fully compliant with the new regulations, reflecting our commitment to tenant safety. Health and safety compliance across the portfolios remains strong.
- 6.4.5 Furthermore, the companies are developing an asset management strategy. A significant focus of this strategy is on 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.

6.5 Running a viable business

- 6.5.1 This objective relates to improving the operational and financial performance of the companies in order to remain financially viable and thus continue to bring benefits to the Council.
- 6.5.2 The key operational issue for i4B and FWH is high void times. Efforts to manage and reduce voids have faced several challenges. One issue is the difficulty in letting Mears properties to accepted Brent homeless applicants, who often prefer to remain within the borough rather than relocating to the Home Counties. Additionally, delays caused by third-party freeholders in completing necessary repairs have further impacted our turnaround times for voids. As set out in the sections on operational performance, a number of improvement actions and projects are in place, which will be brought together in a deep-dive session led by the Board to identify further opportunities for reducing void times and rent loss.

6.5.3 An internal audit of the financial controls and billing arrangements for the Companies was carried out in May 2024. Several areas for improvement were identified and recommendations have been implemented:

- Lack of oversight of legal disrepair claims – there was inadequate communication regarding disrepair claims, leading to situations where the companies were unaware of claims until they are resolved. To improve oversight, officers working for the companies have worked with the Council’s Legal section to introduce a monthly performance report in addition to the quarterly report that is already in place. This new report provides a comprehensive overview of open and recently closed cases, including progress and costs.
- Oversight and inspection of void works – following the audit, direct billing between the companies and Wates has been introduced to improve financial monitoring and forecasting. Additionally, an action log has been introduced into the bi-weekly i4B/FWH voids meetings, detailing owners and target resolution dates for any follow up actions set.
- Council tax billing processes – following improvements recommended in the audit the companies have worked with the Council Tax team to develop a clear and effective process for reviewing and paying council tax liabilities. This process has been formalised in a procedure document to ensure consistency and clarity.
- Lack of policies and procedures – there was previously no comprehensive documentation outlining the billing and management processes for legal disrepair, council tax, or void repair work outside of the SLA between the Council and the companies. The companies’ management team has drafted and circulated process notes that clearly outline the roles, responsibilities, and arrangements for managing and monitoring new voids, council tax, and disrepair cases.

6.5.4 During 2023/24, the Board approved a value for money strategy for i4B and FWH, with focus on improving performance levels, efficiencies and outcomes for tenants and other stakeholders in the following key areas.

- Voids performance
- Income recovery and arrears management
- Asset management and energy efficiency
- Housing management costs
- Tax efficiency
- Value for money for tenants

6.5.5 Improvement plans and actions in these areas are closely monitored by the Board through dedicated quarterly reports.

6.6 *Increasing the supply of affordable housing in the borough*

- 6.6.1 The primary aim of the Housing Companies is to improve the Council's affordable housing offer through the acquisition and letting of properties in Brent and neighbouring boroughs.
- 6.6.2 First Wave Housing and i4B have a common acquisition and development strategy, under which opportunities are progressed through either company in the way that is most beneficial to the overall Council housing strategy. For example, i4B carries out the companies' ongoing street property acquisition programme. As a Registered Provider, FWH is eligible for certain grant opportunities not available to i4B.
- 6.6.3 For 2024/25, i4B has a street property acquisition target of 25; as of July 2024, i4B have purchased 14 street properties with a further 17 in conveyancing. i4B are also in the final stages of purchasing a new build development of nine units in Brent, which, once handed over, will be available for immediate letting. This will put the company ahead of its target for the year and will also use the majority of current loan finance available to the companies.
- 6.6.4 While FWH has not recently taken forward any Section 106 or grant opportunities, the Company is working with the Council on the potential leasing of 118 units at the Fulton Road new-build development in Wembley Park at London Living Rent.
- 6.6.5 The companies are in discussion with Council staff about the future of the acquisition programme and the scope for further loan funding: these discussions are partially dependent on upcoming grant announcements from the government. The Board is committed to playing a full part in increasing housing supply in the borough through the most appropriate routes, so as to continue to reduce the use of insecure and costly Temporary Accommodation for homeless families.

7.0 Future of the Companies

- 7.1 The impact of i4B and FWH on the Council's housing challenges has been significant and positive. Without the existence of the Housing Companies, the waiting lists for housing would be considerably higher, and the strain on the Council's resources even more severe.
- 7.2 i4B has a continued commitment to acquiring street properties in order to house homeless families, reducing both the waiting list and the Council's reliance on expensive temporary accommodation, providing a more sustainable and cost-effective solution to the housing crisis within the borough.
- 7.3 The recent change in government may bring new opportunities for funding or grants. The Companies are prepared to explore any such opportunities to further enhance our capacity to support the Council's objectives. By remaining adaptive and maintaining our focus on strategic acquisitions, we aim to continue making a meaningful contribution to the reduction of homelessness and the provision of affordable housing within Brent.

7.4 As well as increasing supply, the focus of the Company Boards is on driving consistently good performance in areas where issues have been identified, particularly on void times and tenant satisfaction for both companies as well as rent collection for i4B.

8.0 Financial Considerations

8.1 As at end of March 2023/24 the total loan owed by i4B and FWH to Brent Council was £220.2m, split between i4B, £185.9m and FWH £34.3m. The loans are all secured against the properties acquired for the 2 subsidiaries and are below market interest rates.

8.2 The loan terms have been structured not to exceed the terms of loans Brent contracts from the Public Works Loan Board (PWLb). As of 31st March 2024, both i4B and FWH had met loan repayment commitments to date and are on track to meet future repayment obligations.

8.3 Brent Council has made provision for a further loan facility of £40m in its 2024/25 Capital Strategy and Budget report to finance additional acquisitions by i4B. Draw down of the facility by i4B will be subject to i4B finding viable properties that align with the Council's housing priorities. Also, the terms of the loan will be set at the time of draw down to reflect latest economic indicators in order not to put i4B or the Council in a financially disadvantaged position.

8.4 i4B Financial Update

The current year to date financial forecast as at 31st July 2024 for i4B is as follows:

<u>i4B 24/25 July Forecast</u>	Budget Full Year (£'000)	Forecast Full Year (£'000)	Variance Full Year (£'000)
Income	11,021	10,475	(546)
Expenditure	(3,743)	(3,743)	0
Financing	(5,292)	(5,292)	0
Profit (Loss) before tax, revaluations and depreciation	1,986	1,440	(546)

8.5 Income

8.5.1 Forecast Gross Rental Income for the full year is calculated, based on the estimated collection rate (95.1% of budgeted income).

8.6 Void Rent Loss

8.6.1 Forecast void loss has been calculated at £443k for the year based on Brent housing data only for the first 4 months. Data on void loss for Mears managed

properties was unavailable at the time of publication. The forecast will be updated once data becomes available.

8.7 Operating Costs

8.7.1 Forecast spends on operating costs are based on budget and will be updated once data becomes available. Certain areas of expenditure such as Leasehold Service Charges and Property Maintenance Costs show a surplus earlier in the year with billing picking up later in the year. Financing costs related to interest payments are fixed.

8.8 The i4B Holdings Ltd 30 Year business plan approved earlier this year projected an overall profit before tax for the last year in the model (2053/54) of £8.999m

8.9 FWH Financial Update

The current Year to date financial forecast as at 31st July 2024 for FWH is as follows:

<u>FWH 24/25</u> <u>July Forecast</u>	July 24 Actual (£'000)	Budget t YTD (£'000)	Budget Full Year (£'000)	Forecast Full Year (£'000)	Variance Full Year (£'000)
Income	1,173	1,174	3,430	3,430	0
Expenditure	(502)	(614)	(2,667)	(2,667)	0
Financing	0	0	(685)	(685)	0
Profit (Loss) before tax, revaluations and depreciation	671	560	78	78	0

8.10 Income

8.10.1 Gross Rental Income is understated by £3k, due to new tenancy rental income charged higher in the 2024/25 Budget.

8.11 Void Rent Loss

8.11.1 Void loss currently showing favourable surplus of £2k, due to average void loss at 3% over the first 4 months. The budget for the year has assumed a void loss of 4%. However, the commercial unit owned by FWH currently remains void.

8.12 Operating Costs

8.12.1 Overall Operating Cost showing a favourable surplus of £112k, however, when broken down by individual costs:

- 8.12.2 Leasehold Service Charges are showing a surplus; this is due to the timing of billing, as this can be variable throughout the year with an increase in billing near to year end.
- 8.12.3 Property Maintenance Costs are also showing a surplus, for the same reasons cited for the above. However compensation costs as of July are over budget, which could contribute to a possible overspend on the allocated budget for the year.
- 8.12.4 FWH accounts as at the 31st July 2024 show a Profit before tax of £111k. However, this is only for expenditure captured to July 2024. Billing for expenditure is variable throughout the year with billing picking up near to year end, which aligning within budget should enable us to achieve the budgeted profit of £77k.
- 8.12.5 The FWH 30 Year business plan approved earlier this year projected an overall profit before tax for the last year in the model (2053/54) of £1.022m.

9.0 Legal Considerations

- 9.1 i4B and FWH are two local authority housing companies established for the distinct purposes set out at paras 3.1 and 7.1 respectively. Constraints on Housing Revenue Account (“HRA”) borrowing since the Local Government and Housing Act 1989 (largely removed following the abolition of the HRA borrowing cap since 30th October 2018) resulted in local authorities such as Brent Council moving to housing provision outside of the HRA, often using wholly owned companies such as those referred to in this report. The two companies share the same medium- to long-term objectives and Board membership, and they do not directly employ staff, so any work is carried out by Brent staff or contracted organisations.
- 9.2 Part 4 of the Constitution describes the membership and terms of reference for the Council committees and sub-committees including the Resources and Public Realm Scrutiny Committee.
- 9.3 The Council is empowered to establish local housing companies under “incidental” powers within Section 111 of the Local Government Act 1972 2 (LGA 1972) to do anything which is calculated to facilitate, or is conducive or incidental to, the discharge of any of its’ functions. This incidental power must however be exercised in conjunction with a main housing function vested in local authorities under the Local Government Act 1972 in pursuit of housing duties conferred on them under the Housing Act 1996.
- 9.4 A wider legal power (the General Power of Competence (GPC)) is provided to local authorities within section 1 of the Localism Act 2011 to enable them, amongst other things, to establish companies to help them fulfil their legal functions and duties. The General Power of Competence allows local authorities to “do anything that individuals generally may do.” This allows for a more novel approach, to be taken, including the establishment of local

authority housing companies such as those referred to in this Report, to help the Council carry out service delivery for one of its' functions ("Service Delivery Company") or to trade in commercial activities ("Trading Company") *subject to limits* set out in sections 3 and 4 of the Localism Act 2011.

- 9.5 Since the purpose of the two local authority companies described in this report is non-trading and service delivery-focused, and whilst the rents referred to in this Report remain at social or affordable rent levels, the two companies established by the Council are Service Delivery Companies and may provide the housing services that are described in this Report using the General Power of Competence, subject to the restrictions in Section 3 of the Localism Act 2011.
- 9.6 Section 3 prevents a Service Delivery Company from charging for a non-commercial service using the General Power, or its' use of the General Power where there is an overlapping power already in existence, to provide that non-commercial service. NB Section 3 does not prevent the charging by a Service Delivery Company of social rents or affordable rents. The charging of anything that resembles a market rent or commercial rent by a service delivery company would however be prevented under Section 3.
- 9.7 If the Council proposes to change the purpose of the Companies to those of a Trading Company and to charge commercial rents for the purposes of income generation at any time, then the restrictions and conditions in section 4 of the Localism Act 2011 will need to be observed.
- 9.8 Brent Legal, through its residential Property team, carries out the legal and conveyancing work on behalf of i4B and FWH and regular meetings are held between the legal team and i4B/FWH to ensure the timely acquisition of the properties.
- 9.9 Brent Legal, through its Contracts team, also provides support on any loan arrangements or transactional arrangements between the Council and i4B and prepares all the necessary loan, security, and other contractual documentation.
- 9.10 Brent Legal, through its Housing and Civil Litigation team, provides support on legal disrepair claims for i4B and FWH on properties based in the Borough of Brent. It also responds to related legal claims, and deals with possession claims on the grounds of breach of agreement, namely arrears and or anti-social behaviour.
- 9.11 Following the internal audit the Chief Lawyer for Housing and Civil litigation will be attending regular meetings between legal and i4B/FWH along with the provision of monthly and quarterly reports on disrepair cases.

10.0 Climate Considerations

- 10.1 In line with re-confirmed government targets, the companies are aiming at an Energy Performance Certificate rating of C across the stock. To meet this

target will be costly and resource-intensive, so to facilitate and plan for this the companies are in the process of developing an asset management strategy for Board approval. The companies have a good understanding of the energy performance of their stock, and the strategy will include plans to access grant schemes such as the Social Housing Decarbonisation Fund, work with the Council on the retrofit of blocks, and engage other freeholders to ensure that improvement works are carried out to communal and external areas of blocks where required.

11.0 Equity, Diversity & Inclusion (EDI) Considerations

11.1 The Housing Companies do not collect information on the protected characteristics of their tenants. All tenants are Council homeless nominees.

Report sign off:

Peter Gadsdon

Director of i4B Holdings Ltd