



Strategic Risk Update

September 2024

Contents

- 1. Risk Evaluation Matrix**
(Page 2)
- 2. Strategic Risk Heat Map**
(Page 3)
- 3. Strategic Risk Dashboard**
(Pages 4)
- 4. Strategic Risk Plans – *detailed information and action plans***
(Pages 5-32)

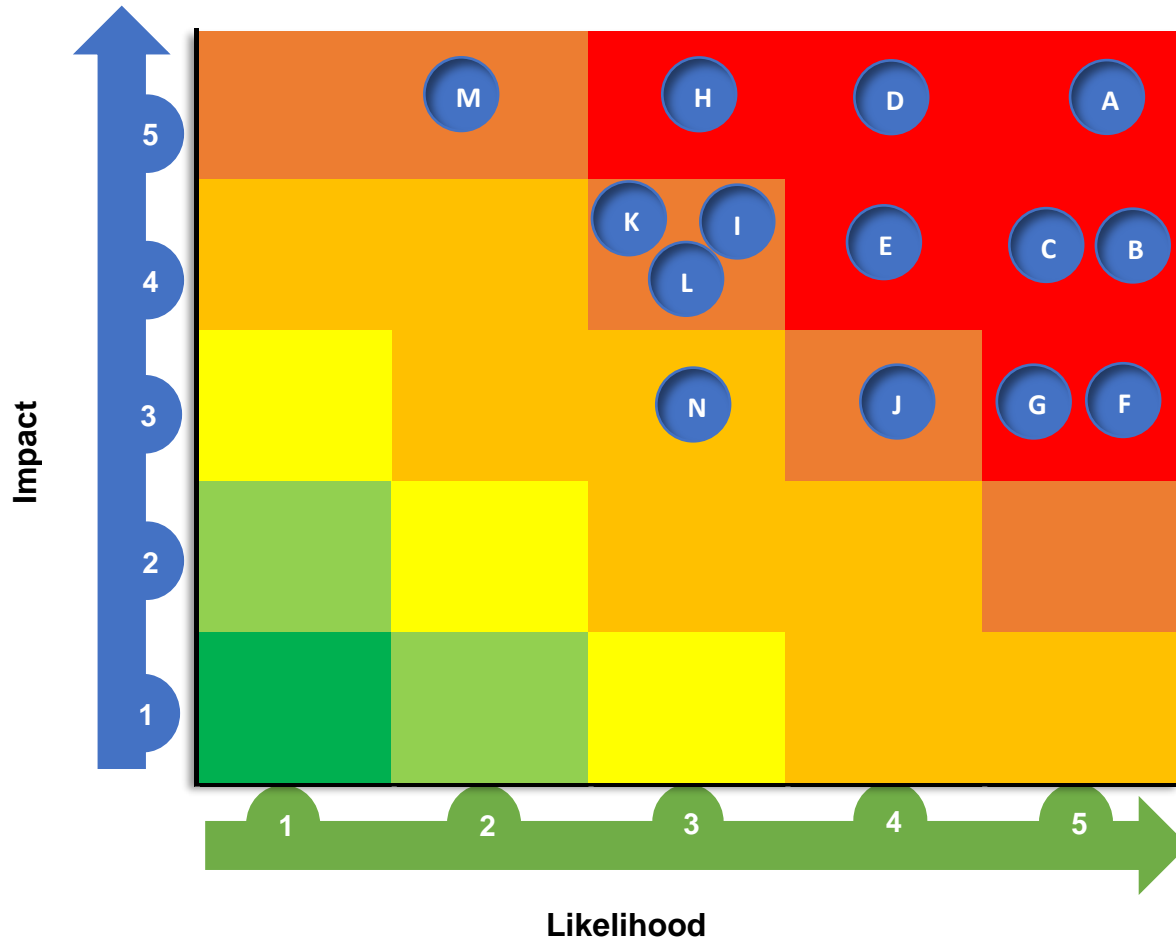
1. Risk Evaluation Matrix

The following impact and likelihood criteria are used to evaluate and articulate the Council's Strategic Risks.

| Risk Impact Matrix | | | | |
|--------------------|--|--|---|---|
| Impact | Financial | Service Delivery | Health and Wellbeing | Reputation |
| 5 | <i>Major Financial loss (above £2m)</i> | <i>Major disruption to a number of critical services</i> | <i>Multiple deaths / serious life-changing injuries / extreme safeguarding concerns.</i> | <i>Long term damage – e.g. adverse national publicity.</i> |
| 4 | <i>Significant Financial loss (above £1m)</i> | <i>Major disruption to a critical service.</i> | <i>Multiple casualties with life changing injuries / significant safeguarding concerns.</i> | <i>Medium to long term damage – e.g. adverse local publicity.</i> |
| 3 | <i>Moderate Financial Loss (less than £1m)</i> | <i>Moderate disruption to a critical service</i> | <i>Moderate risk of injury / noticeable safeguarding risks.</i> | <i>Medium term damage</i> |
| 2 | <i>Small Financial loss (less than £500k)</i> | <i>Moderate disruption to an important service.</i> | <i>Low level injuries / safeguarding risks.</i> | <i>Short term damage</i> |
| 1 | <i>Minor financial loss (less than £100k)</i> | <i>Brief disruption to important service</i> | <i>No immediate impacts to health or wellbeing</i> | <i>Some damage to specific functions</i> |













| Risk Likelihood Matrix | | |
|------------------------|--------------------|---|
| 5 | Very Likely | <i>This event is expected to occur in most circumstances.</i> |
| 4 | Likely | <i>There is a strong possibility this event will occur.</i> |
| 3 | Possible | <i>This event might occur at some point and/or there is history of occurrence of this risk at this and/or other Councils.</i> |
| 2 | Unlikely | <i>Not expected, but there's a slight possibility it may occur at some point.</i> |
| 1 | Rare | <i>Highly unlikely, but it may occur in exceptional circumstances. It could happen, but probably never will.</i> |

2. Strategic Risk Heat Map



- A. Lack of supply of affordable accommodation
- B. Cost of Living Crisis
- C. Increase in Dedicated Schools Grant High Needs Block Deficit
- D. Risk to Community Cohesion
- E. Climate Emergency (Adapting to climate risks)
- F. Climate Emergency (Reaching carbon neutrality)
- G. Cyber Attacks
- H. Financial Resilience and Sustainability
- I. Risk of a serious child protection incident or wider safeguarding concern involving children and young people
- J. Recruitment and Retention
- K. Emergency Preparedness, Response and Recovery
- L. Safeguarding Incident- Adults
- M. Non-compliance with Statutory Housing Duties
- N. Contract Management

3. Strategic Risks - Overview

| Ref | Risk Title | Risk Score | Previous | Trend | Target Score | Gap to target score |
|-----|---|--------------------------|--------------------------|---|------------------------|---------------------|
| A. | Lack of Supply of Affordable Accommodation | 25 (I:5 L:5) | 20 (I:5 L:4) |  | 10 (I:5 L:2) | +15 |
| B. | Cost of Living Crisis | 20 (I:4 L:5) | 20 (I:4 L:5) |  | 15 (I:3 L:5) | +5 |
| C. | Increase in Dedicated Schools Grant High Needs Block Deficit | 20 (I:4 L:5) | 20 (I:4 L:5) |  | 16 (I:4 L:4) | +4 |
| D. | Risk to Community Cohesion | 20 (I:5 L:4) | <i>n/a – new risk</i> | | 15 (I:5 L:3) | +5 |
| E. | Climate Emergency (Adapting to climate risks) | 16 (I:4 L:4) | 16 (I:4 L:4) |  | 16 (I:4 L:4) | = |
| F. | Climate Emergency (Reaching carbon neutrality) | 15 (I:3 L:5) | 15 (I:3 L:5) |  | 15 (I:3 L:5) | = |
| G. | Cyber Attacks | 15 (I:3 L:5) | 16 (I:4 L:4) |  | 12 (I:3 L:4) | +3 |
| H. | Financial Resilience and Sustainability | 15 (I:5 L:3) | 10 (I:5 L:2) |  | 5 (I:5 L:1) | +10 |
| I. | Risk of a serious child protection incident or wider safeguarding concern involving children and young people | 12 (I:4 x L:3) | 12 (I:4 x L:3) |  | 12 (I:4 L:3) | = |
| J. | Recruitment and Retention | 12 (I:3 x L:4) | 12 (I:3 x L:4) |  | 6 (I:3 L:2) | +6 |
| K. | Emergency Preparedness, Response and Recovery | 12 (I:4 x L:3) | <i>n/a – new risk</i> | | 9 (I:3 L:3) | +3 |
| L. | Safeguarding Incident- Adults | 12 (I:4 x L:3) | 10 (I:5 x L:2) |  | 8 (I:4 L:2) | +4 |
| M. | Non-compliance with Statutory Housing Duties | 10 (I:5 x L:2) | 10 (I:5 x L:2) |  | 5 (I:5 L:1) | +5 |
| N. | Contract Management | 9 (I:3 x L:3) | 9 (I:3 x L:3) |  | 9 (I:3 L:3) | = |

A. Lack of supply of affordable accommodation

Due to the limited supply of affordable accommodation in the Private Rented Sector (PRS), settled Temporary Accommodation and Social Housing, there is a risk of insufficient supply to meet the demand from homeless households and the need to place greater reliance on the emergency nightly paid temporary accommodation. This may impact on the wellbeing and quality of life for residents and place an increased financial burden on the Council through high costs of the accommodation and a subsidy loss from Government.


Sponsor: Corporate Director Partnerships, Housing and Resident Services

Risk Update

The Housing Needs Service has seen a 33% increase in demand from families and single people who are either threatened with homelessness, or homeless from 2021/22 (3,282 singles + 2,669 families = 5,498 total applications) to 2023/24 (4,141 singles + 3,159 families = 7,300 total applications). There have been 1,599 applications received in Quarter 1 of 24/25 (785 singles + 1, 599 families). If demand continues at the same rate, the service will receive a total of 6,396 applications in 2024/25 (3,140 singles + 3,256 families), an average of 122 applications per week. Whilst this will be an overall reduction in demand compared to last year, it should be noted that the decrease in demand is from single homeless applicants as opposed to families, where the forecast is a 3% increase from last year. This is significant because it is far more expensive to accommodate a homeless family than a single homeless person.

Affordability issues are driving this high demand, rising rents and the contraction of accommodation available in the Private Rented Sector (PRS), as owners of PRS accommodation are evicting their tenants and exiting the market. Figures released by the Office for National Statistics (ONS) for the period to June 2024 show that since June 2023 there has been a 33.9% increase in private rents in the borough. The use of PRS properties is essential to help meet demand from homeless households, as there is an insufficient supply of social housing. The contraction of supply, coupled with increase in rents has resulted in the service not being able to secure a sufficient supply of affordable PRS accommodation at the Local Housing Allowance (LHA) rate to meet demand. As the thresholds to trigger the statutory duty to provide accommodation are low, the service has a duty to secure interim emergency accommodation for most homeless families with dependent children. Due to the lack of supply of affordable PRS accommodation to move these families on to, the interim emergency accommodation has become silted up with over 1,000 homeless households. This is the most expensive form of TA, as the TA subsidy is capped at 90% of the one-bedroom 2011 LHA rate, which is typically £30 p/n. If a family occupy more than one room, the income is still capped at 90% of the 2011 one bedroom rate.

There is no indication that market conditions in the PRS are improving or that there will be an increase in supply during 2024/25. The Council's house building development programme has also been impacted by an increase in interest rates, resulting in higher construction costs – meaning that building the genuinely affordable homes needed to help meet demand is increasingly challenging. There is also a worrying trend of an influx of large homeless families as a result of family reunion cases from former asylum seekers applying for their family to join them in the UK where they are immediately homeless as they do not have suitable accommodation.

| Risk Scores | I | L | T | Trend |
|-----------------|----------|----------|-----------|---|
| <i>Previous</i> | 4 | 5 | 20 |  |
| CURRENT | 5 | 5 | 25 | |
| <i>Target</i> | 5 | 2 | 10 | |

Key Controls / Mitigating Actions

- A Housing Needs group, chaired by the Director Housing Needs and Support, is in place to monitor the Council's use of emergency accommodation.
- Homelessness services focused on prevention to decrease demand.
- Continued membership of Capital Letters to access a new acquisition scheme through Home Safe Housing (HSH).
- Use of PRS accommodation.
- I4B created to increase supply of affordable PRS accommodation.
- Two purpose built emergency TA schemes delivered, and a third being developed.
- Use of the Local Authority Housing Fund (LAHF) to acquire 42 street properties to rehouse families currently living in temporary accommodation

A. Lack of supply of affordable accommodation - Action Plan

| Ref | Action | Target Date | Responsible Officer | Status |
|--------------------------------------|--|----------------|--|--------------|
| Follow-up of Previous Actions | | | | |
| 1. | To continue delivering the New Council Homes Programme to increase supply of affordable homes. | March 2025 | Senior Development Manager | In progress |
| 2. | To continue to acquire street properties through i4B. | March 2025 | Strategy and Delivery Manager | In Progress |
| 3. | To ensure completion of a new temporary accommodation scheme that would provide an additional 130 units of temporary accommodation. | September 2028 | Project Manager Finance and Resources | In Progress. |
| 4. | To continue to work with Private Sector property owners to procure affordable accommodation. | March 2025 | Service Manager Accommodation Services | In Progress |
| 5. | Continued emphasis on the prevention of homelessness and promote the Find Your Home scheme to encourage households who are threatened with homelessness to source their own PRS accommodation. | March 2025 | Service Manager Housing Options | In Progress |
| 6. | To bring empty properties on the South Kilburn Regeneration scheme back into use as TA. | September 2024 | Director Inclusive Regeneration and Employment | In Progress |
| 7. | To continue membership of Capital Letters to access affordable PRS accommodation through the Home Safe Housing (HSH) scheme. | March 2025 | Director Housing Needs and Support | In Progress |
| New / Proposed Actions | | | | |
| 1. | New Communications Campaign to manage expectations | September 2024 | Head of Communications | In Progress |
| 2. | New scheme to help large families resettle in cheaper areas of the UK | March 2025 | Director Housing Needs and Support | In Progress |

B. Cost of Living Crisis

The cost-of-living crisis caused by the war in Ukraine, Covid-19, Brexit and high rates of inflation impacts on Brent residents resulting in more families and households falling into hardship, leading to increased levels of service demand on the Council and additional pressure on front-line services.

Sponsor: Corporate Director Partnerships, Housing and Resident Services

Risk Update

The cost-of-living crisis has continued to have an impact on the residents of Brent and the Council is committed to doing what it can to support those in greatest need - with a focus on a model which provides residents with the tools and support to improve their situation in the longer term. The cost of everyday essentials, such as food, is still high and fuel prices are set to increase as a result of the change to the energy price cap. Increasing rent costs and a lack of supply of private rented accommodation are driving increasing homelessness and high interest rates are also having an impact. The impact on Brent, with its higher than average unemployment levels and lower wages for those in employment, is particularly severe. The increase in homelessness is also causing budgetary pressure for the Council. Service demand continues to rise with pressures on adults' and children's social care. Pressure on the homelessness service has also increased considerably, with a 23 percent increase in the number of homelessness applications – up from 6,000 to more than 7,300 – over the past three years. Each week, an average of 140 households are becoming homeless. The future of the government Household Support Fund has been uncertain and is due to end on 30 September 2024. We are likely to hear an announcement from Government to extend HSF from September 2024. The amount of Brent's funding is unknown at this stage.

The support services we have in place, including food and fuel support and the Resident Support Fund (RSF) are continuing to be well used. The RSF has supported 4213 customers in 2023/24. Since 1 April 2024 to 28 August 2024-1544 RSF applications have been awarded £920,406. A further 316 customers have been supported through digital support. Support has been provided for household bills, Council Tax, food, fuel, digital equipment and emergency funds. The Government's Household Support Fund has been used to provide support with the cost of food and fuel. During 2024/25 HSF grant of £2.8m has been provided by the Government to be utilised by 30 September 2024. £1.2m of this has been used for RSF with the other funds allocated to provide free school meals during school holidays, as well as to support other vulnerable groups directly and via VCS partners.

| Risk Scores | I | L | T | Trend |
|-----------------|----------|----------|-----------|---|
| <i>Previous</i> | 4 | 5 | 20 | |
| CURRENT | 4 | 5 | 20 |  |
| <i>Target</i> | 3 | 5 | 15 | |

Key Controls / Mitigating Actions

- The Brent RSF has been in place since August 2020. A new model for the RSF moving from crisis support to longer term, more sustainable solutions has been in place since April 2024.
- A range of support has been put in place including a food and fuel poverty toolkit, the Brent Well and Warm scheme and warm spaces.
- As part of the Cost-of-Living Outcome Based review, a number of interventions were tested including a community shop and kitchen based support scheme, a crisis response fund, and additional debt and immigration advice provision. This work has been evaluated and fed into the development of a new approach to Resident Support which has been agreed for three years.

Demand for support from Brent Hubs remains high. Neurodiversity amongst Hub Customers is more and more prevalent making difficult presented needs in practice even more complex to resolve. Most common needs which residents present with at the Hubs are form filling such as RSF applications (24%), food and fuel aid enquiries (15%), housing and homelessness (14%), Council Tax (12%), welfare benefits (10%), and other presented needs (25%), such as, housing benefit; debt and money enquiries; employment, general support, immigration etc. VCS services are also seeing high demand. Brent Hubs is also seeing that low confidence is significant barrier hindering the progression of many Hub Customers, so as a response, the Hubs are developing a Creative Health programme with Partners that will support residents to build confidence and raise their aspirations. A new approach to resident support was agreed by Cabinet in February 2024. The new Resident Support Fund came into effect from 1 April and the enhanced Community Wellbeing service will go live in New Millenium Day Centre will launch in autumn 2024. Building on the successful pilot at Bridge Park Leisure Centre, this service will provide a programme of holistic support to residents and families who are in need, alongside access to good and other essentials.

- A Financial Inclusion Dashboard has been developed which draws together data from across various datasets, including council tax support and benefits. This is used to identify residents who may need targeted supports (i.e. in arrears). It also provides a strategic oversight for senior management.

B. Cost of Living Crisis - Action Plan

| Ref | Action | Target Date | Responsible Officer | Status |
|--------------------------------------|---|---------------|---|-------------|
| Follow-up of Previous Actions | | | | |
| 1. | To agree a future model for Resident Support, based on evaluation from prototyping activity, which will move from a focus on crisis support (based on Government grant funding) to a model which provides residents with the tools and support to improve their situation in the longer term. | February 2024 | Head of Change and Customer Insight | Completed |
| 2. | To implement the new approach. | November 2024 | Head of Change and Customer Insight | In progress |
| New / Proposed Actions | | | | |
| 1. | To consider and agree how to best utilise any extension of the Government's Household Support Fund | October 2024 | Head of Customer Services and Assessments | In progress |
| 2. | To develop and embed employment and skills initiatives as part of the Resident Support Model | March 2025 | Head of Change and Customer Insight | In progress |

C. Increase in Dedicated Schools Grant High Needs Block Deficit

There is a risk that the current deficit will continue to rise due to an increase in the number of children needing Education and Health Care Plans (EHCP). This could have an adverse impact on the Council’s legal obligation to meet the educational needs of pupils who require special educational support. There is also likely to be an adverse impact on the ability to meet the DfE’s requirement to produce a balanced DSG budget.

Sponsor: Corporate Director Children and Young People

Risk Update

The DSG has carried a deficit balance since 2019/20 and the cumulative balance carried forward from 2023/24 was £13.2m. With the current in year DSG forecast deficit of £0.4m, this will increase the overall deficit to £13.6m. To help manage pressures against the High Needs Block of the DSG, Schools Forum have agreed on an annual basis a 0.5% transfer from the Schools Block i.e., £1.3m in 2024/25.

The monitoring of the DSG is reported on a quarterly basis via the finance forecast reports taken to Cabinet and Schools’ Forum. The HNB Management Plan includes a range of measures to reduce the deficit, including tighter financial management controls to ensure full cost recovery from other local authorities that place pupils in Brent special schools, reducing demand for EHCPs and building more local capacity to reduce the need for children to be educated out of borough. In addition, the Council is participating in the Department for Education Delivering Better Value in SEND support programme (DBV), that commenced in autumn 2022 and is aimed at supporting local authorities with substantial deficit issues to reform their high needs systems. The DfE has provided Brent with £1m grant funding to pilot and implement system changes aimed at realising efficiencies.

As a result of these initiatives, the cost avoided equated to £2m in 2023/24 and is forecast to be £2.2m for 2024/25. The actions in the Management Plan and the 0.5% block transfer have reduced the HNB in-year deficit from a potential £2.5m deficit to the current forecast deficit position of £0.3m. However, cost avoidance continues to be required over the next 3 years, despite anticipated increases in HNB funding of 3% in 2025/26 and 3% thereafter.

The current Management Plan assumes a slowdown in the growth of EHCPs from 16% to 7% in response to the range of targeted actions as described above. The forecast reduction in spend based on the mitigating actions and cost avoidance actions in the Management Plan and the DBV plan, which have been quantified, will realise a reduction in spend of circa £11m by 2026/27. However, a reduction in the HNB funding in future years would have an impact on the reduction against the cumulative deficit if demand for EHCPs continues to grow.

There is limited opportunity to recover the historical deficit, due to systemic issues related to the national implementation of the Children and Family Act in 2015 that affect most local authorities in England. The regulations that are in place to carry forward a deficit balance against the DSG were due to end in 2022/23. However, this statutory override has been extended for another three years until 2025/26.

| Risk Scores | I | L | T | Trend |
|-----------------|----------|----------|-----------|---|
| <i>Previous</i> | 4 | 5 | 20 | |
| CURRENT | 4 | 5 | 20 |  |
| <i>Target</i> | 4 | 4 | 16 | |

Key Controls / Mitigating Actions

- Bi-Monthly task group led by Corporate Directors of CYP and Finance.
- Delivery of the DSG Management Plan to address cost pressures.
- Brent’s participation in the government Delivering Better Value (DBV) programme.

C. Increase in Dedicated Schools Grant High Needs Block Deficit - Action Plan

| Ref | Action | Target Date | Responsible Officer | Status |
|--------------------------------------|--|----------------|--|-------------|
| Follow-up of Previous Actions | | | | |
| 1. | <p>Establish more SEND provision in the borough as part of the School Place Planning Strategy Refresh, including developing new Additionally Resourced Provisions in the academic years 2023/2024- 2024/25. This will reduce the need for young people to be placed in schools in other boroughs and in high-cost non-maintained independent special schools.</p> <p><i>Update September 2024: A new Secondary Special School has been established and will move to new buildings in September 2025. A capital programme to establish Additionally Resourced Provisions in mainstream schools is in the construction phase. These will reduce pressure on out of borough placements.</i></p> | February 2024 | Head of Inclusion/ Head of Capital Programmes | In progress |
| 2. | <p>As part of the DBV programme the council has been awarded £1m non-recurrent grant to pump prime a change programme in Brent over the 2023/24 and 2024/25 financial years. The programme of activity includes piloting an early targeted intervention programme for children under 7; a new quality assurance team; a review of banding costs and new commissioning approaches. The programme is overseen by the Corporate Director of Children and Young People and Corporate Director of Resources.</p> <p><i>Update September 2024: Pilot projects are in the implementation phase. A new approach to cost banding will be subject to consultation in the autumn term 2024.</i></p> | September 2025 | Head of Inclusion | In progress |
| 3. | <p>The introduction of the SEN Support service with the expectation to manage demand, as part of the Graduated Response Programme; improved quality EHCP assessment; and person centred planning and SMART annual reviews. Therefore, young people will be provided with earlier support, thereby reducing the need for an EHCP to trigger additional support. £0.5m has been approved by the Schools Forum for SEN Support.</p> <p><i>Update September 2024: This work is ongoing and SEN support activity is integral to the DBV programme.</i></p> | September 2025 | Head of Inclusion | In progress |
| New / Proposed Actions | | | | |
| 1. | Developing further proposals to expand local SEND provision in the borough to reduce the need for young people to be placed in schools in other boroughs and in high-cost non-maintained independent special schools. | September 2025 | Head of Inclusion/ Neil Martin, Head of Capital Programmes | In progress |
| 2. | Implement recommended approaches from DBV pilots to reduce demand for EHCPs and ensure appropriate support is provided (e.g. targeted support for children under 7, implement banding review, SMART annual reviews that reflect changing levels of support in line with young people's progress). | September 2025 | Head of Inclusion | In progress |
| 3. | Continued Central Government lobbying for appropriate funding | September 2025 | Corporate Director, CYP | In progress |

D. Risk to Community Cohesion

The potential of a breakdown of community cohesion in Brent poses significant risks, including increased social tensions, reduced trust among residents, and potential conflicts and violence. This breakdown could lead to a lack of cooperation and understanding among community members, impacting the overall well-being and safety of the area. It may create an environment conducive to extremism.

Sponsor: Corporate Director Partnerships, Housing and Resident Services

Risk Update

Brent had a higher rate of population growth than London and England from 2011 to 2021 Census. It also became more diverse over this period with smaller groups “Any other ethnic group seeing” 145% increase, followed by Arab (+57%). The three largest ethnic groups are Indian (19.5%), Other White (15.9%), and White British (15.2%). This rich diversity of the population brings opportunities for cohesion and unity, but it is not immune to the risks of community tension and conflict. With such a diverse community, we recognise that global events can have a local impact, creating tensions amongst otherwise communities that coexist peacefully. We are therefore mindful of tensions escalating and the possibility of violence disorder in Brent. Unchecked tensions can result in a breakdown in community cohesion and provide permissive environment for prejudice and extremism to thrive and escalate into terrorism.

The aftermath of the Israel-Hamas conflict since October 2023 has led to an increase in hate crimes, notably anti-Semitism and Islamophobia, reflecting heightened tensions within local communities. Protests by Palestine supporters and potential counter-protests by the Jewish community seen in September 2024 near Brent Civic centre was peaceful but such protests could serve as flashpoints for escalating tensions if not effectively managed.

The UK national threat level for Terrorism remains substantial and Brent experience complex risks and challenges. Brent has received targeted Home Office funding to respond to the risks of radicalisation and was recognised as a priority borough by the Ministry of Housing, Communities & Local Government (MHCLG) for community cohesion. Persistent threats from extremist groups and the potential for reduced Prevent funding beyond March 2025 are major concerns, threatening the sustainability of initiatives aimed at preventing radicalisation, community safety and cohesion.

Recent far-right riots nationally and the conviction of a Brent based far-right supporter for terrorist offenses highlights Brent’s susceptibility to this threat. Muslim communities and Community sector partners have expressed significant fear following recent far-right riots, with local multi-faith forums and community engagement indicating a critical need for supportive interventions.

| Risk Scores | I | L | T | Trend |
|-----------------|----------|----------|-----------|----------|
| <i>Previous</i> | - | - | - | n/a – |
| CURRENT | 5 | 4 | 20 | new risk |
| <i>Target</i> | 5 | 3 | 15 | |

Key Controls / Mitigating Actions

- Ensure effective delivery of preventing radicalisation and counter - terrorism work, oversee by the multi – agency - Prevent Oversight Board, chaired at CMT level.
- Advocate for continued and increased funding to ensure the sustainability of crucial initiatives, reflecting Brent’s community cohesion risks.
- Broaden and strengthen the scope of community engagement into effective partnership arrangements to maintain community safety, with a particular focus on tackling extremism, prejudice hate crime and promoting cohesion. Optimising upon the support from Community Leaders, Key Organisations, Police, Multi-faith Forum’s and Schools.
- Continuously assess the impact of current initiatives and remain flexible to adapt strategies based on real-time community feedback and emerging challenges.

Action Plan

| Ref | Action | Target Date | Responsible Officer | Status |
|--------------------------------------|---|-------------|---|-------------|
| <i>New / Proposed Actions</i> | | | | |
| 1. | Advocate and bid to secure MHCLG community cohesion funding to enhance capacity for community engagement and build community network to identify and respond to challenges facing community cohesion. | March 2025 | Community Engagement and Social Infrastructure Manager / Prevent Strategy Manager | In progress |
| 2. | Strengthen multi faith forum and other community network to effectively respond to community tensions and build community resilience by providing tactical, coordination and funding support. | Ongoing | Community Engagement and Social Infrastructure Manager | In progress |

E. Climate Emergency (Adapting to climate risks)

There is a risk that Brent’s infrastructure, public health, and natural environment will be adversely affected by the physical effects of climate change and the consequences of extreme weather at a local level. These impacts will exacerbate existing pressures on public health and wellbeing, infrastructure and housing, the economy, local services and the natural environment; and are likely to be most acutely felt by Brent’s most vulnerable residents.

Sponsor: Corporate Director Partnerships, Housing and


Resident Services

Risk Update

Brent developed its Adaptation and Resilience Plan as part of the 2021-22 Delivery Plan, with a final version published in June 2022. We are currently one of only three boroughs in London who have a published plan of this kind. This document was approached as a form of risk register and examined the specific risks facing Brent from a rapidly changing and more unpredictable climate. The document sets out how the frequency and severity of extreme weather events in the future will depend on the amount of greenhouse gases the world emits, and the resulting increase in global warming. Experts believe that we currently have an opportunity to stop or reverse some of these risks, however many of these changes are now inevitable. Even in a ‘low emission’ scenario where global warming is limited to 2°C, we will still all need to prepare for hotter, drier summers and warmer, wetter winters. Brent, along with the rest of London, faces unique risks due to climate change.

The city’s dense population, urban built environment and lack of green space puts it at increased exposure to surface water flooding, extreme heat and drought in particular. Many homes in London are not resilient to extreme weather, with poorly ventilated buildings and flats at greater risk of overheating. London is also already water stressed, and population growth will put further pressures on public water supply. We have already seen this play out a local level through a number of instances of major flooding affecting 16 roads in recent years; and the Church End & Roundwood area being identified as one of Britain’s hottest neighbourhoods during the 2022 heatwave which saw Britain’s hottest day ever recorded.

The task for the council is to ensure that it is both proactively preparing for these risks and reactively dealing with emergencies caused by extreme weather. The current adaptation and resilience plan is being reviewed and updated in autumn 2024 under the 2024-2026 Climate Programme. The risks remain that implementing the recommended actions are depending on funding, and funding for adaptation work is also severely limited at the scope and scale required. It is also dependent on capacity and acting at pace to keep up with the level of extreme weather that is now inevitable in coming years, and reaching out to vulnerable residents in a coordinated way across relevant council teams and services to ensure that they are aware and prepared to keep themselves safe and well wherever possible in advance of an extreme weather event occurring.

| Risk Scores | I | L | T | Trend |
|-----------------|----------|----------|-----------|---|
| <i>Previous</i> | 4 | 4 | 16 | |
| CURRENT | 4 | 4 | 16 |  |
| <i>Target</i> | 4 | 4 | 16 | |

Key Controls /Mitigating Actions

- The council has an existing Climate Adaptation and Resilience Plan which will be reviewed and updated in autumn 2024 with a focused action plan.
- The council has existing emergency planning/public health/ communications protocols for different levels of extreme weather.
- The council has included adaptation elements for developers to consider as part of the Environment and Sustainable Development Supplementary Planning Document.

Climate Emergency (Adapting to climate risks) - Action Plan

| Ref | Action | Target Date | Responsible Officer | Status |
|--------------------------------------|--|---------------|---|--|
| Follow-up of Previous Actions | | | | |
| 1. | To review the June 2022 edition of the Climate Adaptation and Resilience Plan, starting with organising an adaptation workshop with key stakeholders | February 2024 | Head of Environment Strategy and Climate Action | Completed |
| 2. | To update and re-publish the June 2022 edition of Brent's existing Climate Adaptation and Resilience Plan | Autumn 2024 | Head of Environment Strategy and Climate Action | In Progress |
| 3. | To mainstream the recommended actions within the Adaptation and Resilience Plan into the next borough-wide Climate Emergency Delivery Plan 2024-26 | Autumn 2024 | Head of Environment Strategy and Climate Action | Completed |
| 4. | To develop a set of adaptation tools for boroughs within the West London Climate Emergency Group (discussions are being held on whether the adopt the London Councils draft toolkit rather than devising a sub-regional toolkit) | December 2024 | Head of Environment Strategy and Climate Action | In Progress |
| 5. | To continue to feed into the Green and Resilient Spaces workstream being led by LB Southwark and RBKC at a pan-London level. | Ongoing | Head of Environment Strategy and Climate Action | In Progress |
| 6. | To develop and formalise an Adaptation internal workstream of key officers that meet to discuss risks/actions on a semi-regular basis. | January 2025 | Head of Environment Strategy and Climate Action | Not Yet Commenced – This will be initiated once the plan had been updated |

F. Climate Emergency (Reaching carbon neutrality)

There is a significant risk that carbon neutrality as a borough will not be achieved by either 2030 or 2050, due to a severe lack of funding, resources, and the level of widespread behaviour change required to meet the scale of the challenge. This would have an adverse impact on the local community through greater risk of adverse impacts of climate change such as increased flooding, heatwaves and drought, and would mean that the co-benefits of tackling climate change (such as warmer homes, cleaner air, a healthier population, greener spaces, and a thriving local green economy) will not have been fully realised. **Sponsor: Corporate Director Partnerships, Housing and Resident Services**


Risk Update

The council unanimously declared a climate and ecological emergency in 2019 and pledged to do all in our gift to reach carbon neutrality by 2030. Demonstrating progress in reducing local authority emissions is a hugely difficult for all councils, and in practice, councils are only able to directly influence a small proportion of emissions within their local area.

The UK government produces an annual breakdown of carbon dioxide emissions by Local Authority area as a subset of its annual inventory of greenhouse gas emissions. The most recent dataset available is from the 2022 calendar year and outlines that there were 910 kilotons of carbon dioxide emitted within the Brent boundary (39% from homes; 26% from transport; 35% from non-domestic properties). Indirect consumption emissions which arise the consumption habits of Brent's residents are estimated to be 3-5 times higher than this. Whilst Brent's carbon emissions have reduced by around 42% against since 2005, achieving carbon neutrality by 2030 remains extremely challenging, requiring a massive upscaling in nationally funded infrastructure programmes as well as concerted action and behaviour change from all sectors and individuals across society.

The council commissioned a carbon scenarios study in 2019 which estimated that the cumulative capital investment required for Brent to reduce carbon emissions at the scale required would cost £3.1bn. The current funding landscape for climate initiatives is severely limited, and whilst the council has been successful in obtaining over £12m in external grant funding since 2020, this is clearly below the level of investment and resources that are required for a genuine and transformative net zero transition.

Brent is not alone in this challenge. All local authorities that have declared a climate emergency are facing similar challenges. The vast majority of London Boroughs have set more ambitious net zero targets than the government, and the Mayor of London has also pledged for London to be a net zero city by 2030.

| Risk Scores | I | L | T | Trend |
|-----------------|----------|----------|-----------|---|
| <i>Previous</i> | 3 | 5 | 15 | |
| CURRENT | 3 | 5 | 15 |  |
| <i>Target</i> | 3 | 5 | 15 | |

Key Controls / Mitigating Actions

- The council's climate programme is overseen quarterly by a Corporate Sustainability Board, chaired by the Director of Communities and Partnership.
- Progress with the 2022-24 Climate Programme and proposals for the new 2024-2026 Climate Programme are being considered by Cabinet in October 2024.
- We have recently developed an annual data dashboard which measures progress against 47 indicators linked to the Climate Programme.
- The council is actively linked into Pan-London and sub-regional West London workstreams which are seeking to achieve similar objectives.
- The Brent Environmental Network and its sub-groups is the focal point for driving initiatives and behaviour change within the community.
- The council has recruited a Funding and Bid Writing Manager to continue to monitor the funding landscape

Action Plan – Climate Emergency (Reaching carbon neutrality)

| Ref | Action | Target Date | Responsible Officer | Status |
|--------------------------------------|--|---------------|---|-------------|
| Follow-up of Previous Actions | | | | |
| 1. | To continue to deliver and complete actions within the 2022-24 borough-wide Delivery Plan (55% actions completed/ 40% in progress / 5% inactive/ unlikely to be completed) | December 2024 | Head of Environment Strategy and Climate Action | In Progress |
| 2. | To review and develop plans for South Kilburn and St Raphael's Estate (development-led Green Neighbourhoods) | October 2024 | Head of Environment Strategy and Climate Action | Completed |
| 3. | To undertake a review of effectiveness of our current Green Neighbourhoods programme | Summer 2024 | Head of Environment Strategy and Climate Action | Completed |
| 4. | To develop the new 2024-2026 Climate Programme | October 2024 | Head of Environment Strategy and Climate Action | In Progress |
| New / Proposed Actions | | | | |
| 1. | To implement the 2024-2026 Climate Programme | October 2024 | Head of Environment Strategy and Climate Action | In Progress |

G. Cyber Attacks

There is a heightened threat of Cyber-attacks. If attackers were successful, this would potentially impact all services, to the extent that service provision would be significantly affected in the first instance. Sensitive data may be published online resulting in significant fines from the ICO and reputational damage to the Council.

Sponsor: Corporate Finance and Resources

Risk Update


Several Councils have been subject to Cyber-attacks. The Cabinet Office are advising that there is a heightened security risk level at the current time, and the frequency of occurrences affecting our third-party suppliers or other local government bodies has seen a marked increase.

Shared Technology Services (STS) and strategic partners have deployed technologies and processes to enhance our cyber protection. The protection in place for the Council to prevent an intrusion is considered high. STS and Brent have cyber strategies in place and are in the process of updating those strategies considering the prevailing threats. Considerable investment continues to be made to improve cyber security; we have recently enhanced our monitoring capabilities with the procurement of a third-party service from CrowdStrike for the monitoring of on-premises and cloud-based servers.

However, the level and type of threat continues to evolve, shifting our focus to perimeter monitoring and protection. Learning from recent security exercises have been used to develop new plans to mitigate attacks, enabling Brent to better manage incidents when they arise. Brent will continue to work with strategic partners to combat cyber-security threats.

Brent continues to benchmark its approach and learn from the experiences of others. A recent Cyber 360 review by the LGA included positive feedback about the cyber security culture and governance within the council.

Over the last year, in conjunction with emergency planning teams and business services we have carried out 'table top' exercises to practice our response in the event of a cyber-attack. This has provided valuable learnings, shared across all STS partner councils.

| Risk Scores | I | L | T | Trend |
|-----------------|----------|----------|-----------|---|
| <i>Previous</i> | 4 | 4 | 16 |  |
| CURRENT | 3 | 5 | 15 | |
| <i>Target</i> | 3 | 4 | 12 | |

Key Controls / Mitigating Actions

- Implemented tools to monitoring and detects abnormal activity.
- Security Logging and Endpoint Management.
- Enhanced awareness and training across specialist IT and all Brent users.
- Continuous development and testing of Cyber Playbooks.
- Developing strategic partnership with third party security specialists.
- Investment in an enhanced backup solution.
- Ran 'Table-Top' cyber-attack exercises with business services and emergency planning teams, to practice our coordinated response to any attack.

Action Plan – Cyber Attacks

| Ref | Action | Target Date | Responsible Officer | Status |
|---|--|---------------|------------------------------|---------------------|
| <i>Follow-up of Previous Actions</i> | | | | |
| 1. | We have now implemented a suite of tools (enabled partly by the recent investment in M365 E5 licenses), allowing greater security logging and event management through a centralised alerting platform. | February 2024 | Chief Security Officer | Completed |
| 2. | We are seeking to onboard a third-party Security Operations Centre service to monitor and respond to incidents on our End User Compute estate, this will leverage Brent’s investment in E5 technologies. Procurement for this service is due to start in September 2024 | December 2024 | Chief Security Officer | In Progress |
| 3. | A table-top exercise with the Emergency Planning team for our Cyber Playbooks with executive-level involvement, has been carried out in February 2024 and August 2024. Further exercises are being planned and a quarterly cross-partner council meeting has been scheduled to share experiences and learning. | Ongoing | Managing Director - STS | Completed / ongoing |
| 4. | Enhanced training for IT staff within STS and Brent IT teams on cyber, security and technology. | March 2025 | Cyber and Compliance Manager | In Progress |
| 5. | Carry out independent peer reviews of Tier 1 systems. | March 2025 | Chief Security Officer | In Progress |
| 6. | Test disaster recovery of key line of business systems – this is a continual plan. | Ongoing | Deputy Director Operations | Completed / ongoing |
| 7. | Obtain supply chain cyber security assurance from application vendors. We have assessed the risk levels for each of our key suppliers and will be sending out relevant questionnaires for each to complete. | March 2025 | Cyber and Compliance Manager | In Progress |

H. Financial Resilience and Sustainability


The budget setting process may not account for emerging unknowns and/or there may be delays in delivering planned savings, which may impact on the Council’s overall financial resilience and sustainability. This may result in the Council not having sufficient resources to fund all of its priorities or needing to find further savings to meet budget gaps. **Sponsor: Corporate Director Finance and Resources**

Risk Update

Since 2010, Brent has delivered total cumulative savings of £210m. In February 2024, Council agreed the budget for 2024/25, which included £8m of savings, with £3.6m to be delivered in 2024/25 and £4.4m in 2025/26. This was in addition to the £4.5m savings agreed in February 2023 for 2024/25, taking the total savings to be delivered in 2024/25 (£8.1m) and 2025/26 (£4.4m) to £12.5m. An update on the budget position and the MTFs was brought to Cabinet in July 2024 and further updates will be provided in the draft budget in November 2024 and the final 2025/26 budget in February 2025. The report also highlighted the significant risks, issues and uncertainties with regards to the Council’s Medium Term Financial Strategy (MTFS) caused by high levels of inflation and interest rates, increased demand for key services, the effects of the cost-of-living crisis and uncertainty in government funding.

The 2024/25 Local Government Finance Settlement was the sixth annual one-year settlement for local government and continued the trend of real terms cuts to funding. At present, there continues to be a high-level of uncertainty over the economic environment and the future funding of local government, which makes long-term financial planning difficult. In July 2024, there was a change of Government, but the new Government have since confirmed in multiple statements and policy papers that the public finances are in a challenging position and that departmental spending cuts will be required in future years. Such cuts to departmental spending are likely to fall disproportionately on unprotected departments like MHCLG and affect the funding available to local authorities to meet the serious issues they are facing. The Government have confirmed that the next spending review will be a multi-year review, covering at least the next three years and that going forwards spending reviews will take place every two years, with at least a three-year funding horizon. It is hoped that this will provide an increased degree of certainty around the level and types of funding to be provided to local government that will make long-term financial planning easier, even as the outlook remains extremely challenging.

In July 2024 Cabinet received the Quarter 1 position for 2024/25, which set out a forecast overspend of £10m due to a rise in homelessness and reduction in the supply of suitable temporary accommodation. Since July, the position has worsened still and is now a £16m pressure. Additionally, a new pressure of £9m has been identified against ‘Supported Exempt Accommodation’. This current forecast overspend represents over 7% of our net budget. This exceeds the level of 5% that the Council decided should be held as generally usable reserve at the time of setting the 2024/25 budget. The introduction of spending controls and the Budget Assurance Panel in 2023 helped to facilitate better grip of the Council’s financial position and stabilise the in-year overspend in 2023/24.

| Risk Scores | I | L | T | Trend |
|-----------------|----------|----------|-----------|---|
| <i>Previous</i> | 5 | 2 | 10 |  |
| CURRENT | 5 | 3 | 15 | |
| <i>Target</i> | 5 | 1 | 5 | |

Key Controls /Mitigating Actions

- The Council monitors the delivery of planned savings, and mitigating actions where relevant, on a quarterly basis and these are reported to CMT and Cabinet
- Each department monitors the delivery of planned savings, and mitigating actions where relevant, at its DMT.
- A Savings Tracker is reported to CMT and Cabinet alongside the quarterly monitoring report.
- Savings proposals are subject to challenge and review prior to inclusion in the budget.
- Review of fees and charges and challenge of income assumptions. Workshops to review growth and savings proposals for realism and deliverability.
- Regular update reports to members on the economic environment and national and local challenges facing the Council.
- Budget Assurance Panel provides oversight and scrutiny of the Council’s financial position, including in-year budget pressures and issues, mitigating actions and the delivery of agreed savings.

This introduced a range of measures including proactive vacancy management, directorate led targeted non-essential spending control including agency and interim spend, alongside department led management action plans reflecting other actions being undertaken. These sensible, proactive and prudent measures are estimated to have led to cost avoidance of c£3m across the Council and are providing more assurance over the Council’s spending decisions. Given the current forecasted overspend, these spending controls will continue throughout 2024/25. However, it is clear that further actions are now necessary, including a new requirement for services to deliver £10m of in-year savings in addition to the £8m of savings already being delivered during 2024/25. Identifying and delivering this level of additional savings will be a significant challenge for the Council’s services during the coming months, but this is considered to be a necessary step to ensure that the Council’s budget can be returned to a sustainable position. Services will now be required to report to CMT monthly on the progress with delivery of the in-year savings. The significance of the financial risks cannot be underestimated, and measures are being taken to ensure that the Council continues to operate in a financially sustainable and resilient way.

- Expenditure controls imposed across the Council.
- Monthly reporting to CMT on in-year savings.

Action Plan – Financial Resilience and Sustainability

| Ref | Action | Target Date | Responsible Officer | Status |
|--------------------------------------|--|--------------------------|----------------------------|-------------|
| Follow-up of Previous Actions | | | | |
| 1. | To continue the ongoing robust budget monitoring regime and framework. | Ongoing | Deputy Director of Finance | In Progress |
| 2. | To continue to support the Budget Assurance Panel in providing oversight and scrutiny of the Council’s financial position, including in-year budget pressures and issues, mitigating actions and the delivery of agreed savings. | Ongoing | Deputy Director of Finance | In Progress |
| 3. | To regularly review the existing expenditure controls and implement new enhanced spending controls where required to return the budget to a sustainable position. | Ongoing | Deputy Director of Finance | In Progress |
| New / Proposed Actions | | | | |
| 1. | £10m in-year savings target for 2024/25 | September 2024 - ongoing | All Corporate Directors | In Progress |
| 2. | Monthly CMT monitoring of progress with in-year savings | September 2024 - ongoing | All Corporate Directors | In Progress |

I. Risk of a serious child protection incident or wider safeguarding concern involving children and young people

There is a risk of a serious child protection incident or wider safeguarding concern involving children and young people due to increased demand and/or a failure in quality assurance processes. This could have an adverse impact on multi-agency partnership working, community confidence in local safeguarding practice, weakening of existing systems resulting in a downgrading of the local authority's Ofsted rating and pressure on the departmental budget to mitigate for any wider system failure.

Sponsor: Corporate Director Children and Young People

Risk Update

All recommendations have been implemented following the ILACS Inspection of CYP that took place in February 2023, that judged the service to be 'Good' in all areas including overall effectiveness. A Practice Improvement Plan is in place to ensure that the service continues to improve, and quarterly updates are provided to senior leaders to check that progress and impact is on track. Inspection preparation is underway for an expected Focused Visit by Ofsted within the next 6 months (by March 2025). The annual engagement meeting with Ofsted is scheduled for October 2024 and the LA's self-evaluation of practice will be updated for discussion at that meeting.

There is strong multi agency working, both at an operational level about individual children and via the various strategic forums in place. Following the publication of Working Together 2023, revised strategic partnership working arrangements, in line with changes in Working Together, have been agreed and will be fully in place before the deadline of December 2024.

Demand for services remains high as well as the complexity of presenting casework. There are controls in place to ensure that caseloads are kept at manageable levels coupled with strong management support, training and reflective supervision of staff. This is further strengthened with a revised programme of regular quality assurance activity and learning events on high profile incidents.

There is a national shortage of social workers and reliance of agency staff as a result. The London Pledge is in place to maintain the consistency of agency rates being applied and this will be superseded by national rules on children's agency social workers that are due to be implemented in autumn 2024. There are a range of initiatives in place to recruit and retain permanent staff supported by a Workforce Development Plan, and a Workforce Development Group chaired by the Corporate Director of CYP. This includes a grow your own programme, step up to social work scheme and international recruitment. To manage staffing pressures an Establishment Board was set up, chaired by the Director, Early Help and Social Care, to monitor spend against established posts with controls in place to ensure all recruitment is managed within agreed procedures. This has enabled a tighter grip on recruitment and providing opportunities to target agency staff for agency to permanent recruitment, as well as helping to shape recruitment campaigns in specific difficult to recruit areas. This has resulted in cost avoidance and reduced spending by 25%. Fourteen agency staff converted to permanent roles between April 2023 and March 2024.

| Risk Scores | I | L | T | Trend |
|-----------------|----------|----------|-----------|---|
| <i>Previous</i> | 4 | 3 | 12 | |
| CURRENT | 4 | 3 | 12 |  |
| <i>Target</i> | 4 | 3 | 12 | |

Key Controls / Mitigating Actions

- Quarterly reporting of quality assurance reports about practice and learning. Monthly performance reporting to senior leaders.
- Bi-Monthly Workforce Development Group chaired by the Corporate Director of CYP to monitor initiatives in the Workforce Development Plan.
- A fortnightly Establishment Board to ensure tighter oversight of recruitment of posts against the establishment and available budget.
- Brent's participation in the London Pledge for agency staff recruitment to maintain day rates at agreed levels.
- Practice improvement plan and implementation of existing quality assurance framework, reporting ¼ to DMT.

Action Plan – Risk of a serious child protection incident or wider safeguarding concern involving children and young people

| Ref | Action | Target Date | Responsible Officer | Status |
|--------------------------------------|--|---------------|--|-------------|
| Follow-up of Previous Actions | | | | |
| 1. | Monthly monitoring of performance data to review demand, trends, throughput of casework and caseloads. Exception reporting on areas where there is pressure or work in the system that is performing below expected targets with additional monitoring in place. | February 2024 | Director Early Help and Social Care | Completed |
| 2. | Learning on complex and high profile cases within service areas and within the existing safeguarding partnership structures. | March 2025 | Head of Safeguarding and Quality Assurance | In Progress |
| 3. | Targeted recruitment campaigns and continued focus on agency to permanent recruitment. | Ongoing | Director Early Help and Social Care | Completed |
| 4. | Continued tighter financial management controls. | March 2025 | Director Early Help and Social Care | In Progress |
| New / Proposed Actions | | | | |
| 1. | Targeted recruitment campaigns and continued focus on agency to permanent recruitment. | March 2025 | Director Early Help and Social Care | In Progress |
| 2. | Continued tighter financial management controls. | March 2025 | Director Early Help and Social Care | In Progress |
| 3. | Complete re-design programme in early help and social care and implement new model in line with budget envelope | April 2025 | Director Early Help and Social Care | In Progress |
| 4. | Continue implementation of the quality assurance programme and learning events | March 2025 | Head of Safeguarding and Quality Assurance | In Progress |
| 5. | Ensure Working Together 2023 partnership arrangements fully implemented | December 2025 | Corporate Director Children and Young People | In Progress |

J. Recruitment and Retention

Failure to recruit and retain sufficient permanent staff to a significant number of posts, including senior managers, leaves services without sufficient and/or sufficiently qualified staff leading to services being impaired and an overreliance on agency/interim staff. **Sponsor: Corporate Director Law and Governance**

Risk Update

Voluntary turnover has remained just below 10% for the last year but increased slightly in Quarter 1 24/25. We continue to experience challenges recruiting to key roles such as social workers, it is not just recruiting to these roles that is an issue but retaining them. We continue to experience challenges in recruiting to other specialist roles such as lawyers, housing staff and qualified finance roles. We believe some of this in legal relates to a combination of the requirement to come into the office more and the ability to earn high day rates as interim. As a result, we continue to engage agency staff on high day rates across a number of specialist roles.

The Council will be monitoring the impact on recruitment and retention of being in the office at least 3 days a week from October.

| Risk Scores | I | L | T | Trend |
|-----------------|----------|----------|-----------|---|
| <i>Previous</i> | 3 | 4 | 12 | |
| CURRENT | 3 | 4 | 12 |  |
| <i>Target</i> | 3 | 2 | 6 | |

Key Controls and Mitigating Actions

- A range of potential incentives have been implemented, including financial supplements that can be applied to 'hard to fill' posts.
- A number of new 'grow your own' incentives in Learning and Development have also been implemented, including coaching and mentoring programmes, leadership and development programmes, and expanding the upskilling of apprenticeships.
- An arrangement has been agreed with LinkedIn to promote Council adverts and vacancies.
- Specialist recruitment campaigns are also being devised
- We have managed service provision for the supply of agency staff to mitigate the risks to services of vacancies while controlling cost and arrangements for approval of off contract spend.
- Head-hunting also continues via the Multi-Service Provider and external recruitment agencies for specialist/hard to recruit to roles.

Action Plan – Recruitment and Retention

| Ref | Action | Target Date | Responsible Officer | Status |
|--------------------------------------|--|-------------|---|-------------------|
| Follow-up of Previous Actions | | | | |
| 1. | Working with job board providers to maximise the functionality on offer to increase the profile of jobs at Brent | Ongoing | Senior Recruitment & Resourcing Manager | In Progress |
| 2. | Review of recruitment team operating model to increase the focus on direct sourcing activity. | Summer 2024 | Director of HR&OD | Completed |
| 3. | Review of the Council's policies in relation to market supplements and other R&R allowances. | Jan 2025 | Policy & Projects Manager | Not Yet Commenced |
| 4. | Review controls in respect of agency staff pay rates. | Ongoing | Senior Recruitment & Resourcing Manager | In Progress |
| 5. | Monitoring of the impact of the office attendance requirements – e.g. exit interview data will be analysed and feedback from managers/applicants through recruitment campaigns gathered and analysed to understand impact | Ongoing | Director of HR &OD | In Progress |
| New / Proposed Actions | | | | |
| 1. | New roles in the revised HR&OD structure have been recruited to. This includes new roles of Senior Recruitment & Resourcing Manager, Resourcing Business Partner and Social Media Assistant. We will for the first time have dedicated resources to work with managers on hard to recruit job campaigns, targeting specialist media, candidates and building the employer brand. Time will tell if this supports the reduction of hard to fill vacancies. This must be managed alongside building the employer brand which will take time. It will also allow managers time to build their own expertise in recruitment by having dedicated resources to work with them. We will also better utilise job boards for targeted campaigns and work with Directors on their recruitment strategies | Ongoing | Senior Recruitment & Resourcing Manager | Not Yet Commenced |
| 2. | Work with Directors to review their agency spend and how to use targeted campaigns to reduce reliance on agency spend or where we can't to see where we can gain greater efficiencies in rates we pay | Ongoing | Senior Recruitment & Resourcing Manager | Not Yet Commenced |

K. Emergency Preparedness, Response and Recovery

There is a risk that the Council fails to adequately prepare for and/or respond to a major incident in Brent, which may lead to an incident having a significant impact on the health, safety and wellbeing of our residents, communities, businesses and staff. This may also lead to an inability to deliver critical services, further increasing the impact on residents. **Sponsor: Corporate Director Finance and Resources**

Risk Update

Emergency Planning work to the requirements of the Civil Contingencies Act 2004. There is sufficient oversight and scrutiny of our activities both via national and regional reporting mechanisms in addition to the routine oversight exercised by the leadership of the council. An external review of the Council's Emergency Planning and Resilience (EP&R) capabilities was undertaken in October 2023. Since then, the EP&R team has been working towards implementing the 22 recommendations that were raised. Of the 22 recommendations raised, 9 have been completed; 2 will no longer be taken forward in relation to additional resources and on call arrangements; and 11 are in progress with all on track to be completed by 31st March 2025. These recommendations are being progressed alongside actions that were identified as part of a self-assessment that was completed against the Resilience Standards for London (RSLs). Across the 11 standards, the Council has assessed itself (as of February 2024) as having four areas that are established and seven that are developing, which is broadly in-line with other boroughs across London.

The EP&R team is now fully resourced with four FTE. As well as the permanent team, the Council's response arrangements are supported by volunteers from other parts of the Council. There are a number of roles that people can volunteer to undertake, including Loggists, Local Authority Liaison Officers (LALOs) and Rest Centre staff. There is currently a need to increase the number of volunteers that support the team, to ensure the Council has the resilience to sustain a protracted response if required. The team are in the process of trying to raise the profile of the volunteer roles.

Two additional officers have undertaken Humanitarian Assistance Lead Officer (HALO) training this year, which means the Council currently has four people trained to fulfil this role. Several training exercises have also been undertaken in-year, including for the Strategic (gold) and tactical (silver) teams.

The final report from the Grenfell Tower Fire was published on the 4th of September. There were 10 recommendations related to Local Authority emergency planning and response arrangements. Each of the recommendations has been allocated a Local Authority Resilience Board or Professional Network to consider, consult, and propose actions necessary to support the way in which London Boroughs collectively address them, where necessary. The EP&R team had already identified improvements in some of the areas identified and will continue to progress this work, while awaiting feedback from the resilience boards.

| Risk Scores | I | L | T | Trend |
|-----------------|----------|----------|-----------|---------------------|
| <i>Previous</i> | - | - | - | <i>n/a new risk</i> |
| CURRENT | 4 | 3 | 12 | |
| <i>Target</i> | 3 | 3 | 9 | |

Key Controls and Mitigating Actions

- Business Continuity plans in place covering all departments / service areas.
- Multi-agency and internal training and exercise programme in place.
- On-call arrangements are in place.
- Major Incident Plan in place.
- Borough Risk Register in place and up to date
- Meetings and participation with the Borough Resilience Forum
- London Standardisation, which supports the ability to request mutual aid if required.
- External review undertaken in 2023 and the self-assessment against the Resilience Standards for London has provided assurance in respect of benchmarking against London peers.

Action Plan – Emergency Planning and Resilience

| Ref | Action | Target Date | Responsible Officer | Status |
|--------------------------------------|--|----------------|---|-------------|
| Follow-up of Previous Actions | | | | |
| 1. | n/a – new risk. | | | |
| New / Proposed Actions | | | | |
| 1. | Complete implementation of recommendations from external review. | March 2025 | Emergency Planning and Resilience Manager | In Progress |
| 2. | Raise the profile of EP&R internally. Progressing the Grenfell recommendation for all council staff to recognise resilience and preparedness as an essential part of their role. | September 2025 | Emergency Planning and Resilience Manager | In Progress |
| 3. | Review Governance Structures for EP&R internally. | March 2025 | Emergency Planning and Resilience Manager | In Progress |
| 4. | Business Continuity Programme being refreshed to ensure all elements of the BC cycle are being implemented adequately. Additional focus is needed to develop a BC policy, embed BC and ensure services are considering it when consider their key suppliers. | March 2025 | Emergency Planning and Resilience Manager | In Progress |

L. Safeguarding Incident- Adults

There is a risk that there is a serious safeguarding incident involving a vulnerable adult in Brent, meaning the Council would be required to investigate and respond, and minimise the risk to the individual wherever possible. Depending on the incident and response, this may attract adverse publicity and/or require a Safeguarding Adults Review.

Sponsor: Corporate Community Health and Wellbeing

Risk Update

ASC have a Safeguarding Adult Team that operate according to the Pan-London Safeguarding procedures, and who have been recently audited and found to have no significant areas of concern. The service works to minimise safeguarding concerns and prevent abuse wherever possible, however there is a realistic acceptance that not all safeguarding incidents can be avoided.

Safeguarding is often termed to be 'everybody's business' and requires robust information sharing to ensure the statutory criteria for decision making is evidenced. There continues to be a theme in Safeguarding Adult Review (SAR) where Brent needs to continue improving their collaboration with partner agencies and ensuring a co-production approach is maintained whenever possible, in line with commissioning services. Brent is working with the SAB and partners to develop a learning and development plan that reflects the required learning from SARs for all agencies.

The aim is to implement this via the Safeguarding Adult Board. The operational team will continue to establish core-working relationships with partners to ensure we are able to deliver effective and creative care planning. Recording of information safeguarding concerns and timely progression of these are an ongoing development area. Staff has all been briefed on standard and expectation of which will be monitored of the next few months. It must correlate with current GDPR and Equality Rights legislation by Adults Social Care officers. These areas are continually under review and work is ongoing. Not doing this could result in an increase in cross agency failing vulnerable adults within Brent.

The challenges faced by services involved in safeguarding, noting the Board is to continually have a focus on obtaining assurances that all agencies continued to work effectively together, to ensure all adult safeguarding needs are met and continues to be managed effectively. If this is not done there is a risk of cases falling through the net and could result in incidence of near misses or untimely death.

| Risk Scores | I | L | T | Trend |
|-----------------|----------|----------|-----------|---|
| <i>Previous</i> | 4 | 3 | 12 |  |
| CURRENT | 4 | 3 | 12 | |
| <i>Target</i> | 4 | 2 | 8 | |

Key Controls / Mitigating Actions

- There is a Safeguarding Adult Board in place, and it has an independent chair.
- The board set Annual priorities that are analysed across the system over the year.
- There is a Safeguarding Adults Review (SAR) Group in place that review all serious concerns and may recommend the case has a full review. These SAR enables the system to learn from any failings or near misses.
- Practice Audits are in place to drive a culture of personal and collective responsibilities and to identify areas for development across the service.
- The SAB has a responsibility to coordinate appropriate SA training for all partners annually.
- In addition, ASC commission SA training for staff based on training needs.

Action Plan – Safeguarding Incidents - Adults

| Ref | Action | Target Date | Responsible Officer | Status |
|---|--|--------------|-------------------------------|-------------|
| <i>Follow-up of Previous Actions</i> | | | | |
| 1. | The Department are due to undertake a 'Safety' self-assessment using the CQC framework to assure itself it has safe systems in place. | January 2025 | Director Adult Social Care | In Progress |
| 2. | We have commissioned a Safeguarding review across the service, feedback will form our Safeguarding improvement plan | January 2025 | Director Adult Social Care | In Progress |
| <i>New/Proposed Actions</i> | | | | |
| 1. | “NEED TO KNOW” escalation form and process to be revised and updated within Adult Social Care | January 2025 | Director of Adult Social Care | In progress |
| 2. | Safeguarding Mosaic Process flows being reviewed in line with the proposed ASC Restructure, ensuring efficient processes and clear roles and responsibilities within teams | January 2025 | Director of Adult Social Care | In progress |

M. Non-compliance with Statutory Housing Duties

Failure to comply with ongoing statutory Building Safety Act and Fire Safety (England) Regulations requirements and deadlines, may result in a serious health and safety incident or non-compliance with legislation, which may lead to serious injuries and/or fatalities, reputational damage, fines and/or imprisonment.

Sponsor: Corporate Director Partnerships, Housing and Resident Services

Risk Update

As a landlord we have to ensure we are complying with all our statutory duties and health and safety compliance particularly Fire, Legionella, Asbestos, Gas, Electric and Lifts (FLAGEL) form part of those duties. Failure in any of the areas would be a breach of the consumer standards and the Council would be subject to sanctions from the Regulator of Social Housing (RSH).

Following the Grenfell Tower inquiry findings published in October 2019, there was a number of recommendations made to prevent such a tragedy from ever happening again. The Government undertook to introduce new regulations based on these recommendations. These regulations take the form of the Fire Safety (England) Regulations 2022 and extend duties imposed by the Regulatory Reform (Fire Safety) Order 2005.

The Building Safety Act 2022 was introduced to improve the housing safety standards for residents giving them more rights and protections. The Building Safety Regulator (BSR) will oversee the safety and performance of all buildings with a special focus on high rise buildings. The above have stipulated actions that have to be completed by certain deadlines to show assurance that our buildings are safe and to avoid any further actions by the Building Safety Regulator. One example is the preparation of Building Safety Cases for our 41 High Rise Blocks by April 2024. The Building Safety Act working group was formed in September 2023 and currently meet fortnightly to assess progress on adherence with the Act. The group has developed a process for updating vulnerable resident's details that are held in the secure information boxes. The group have also started to engage with residents in high-risk buildings. The first three block meetings were held in December to discuss building safety and the fire strategy for each block. All high-risk building were registered complete with structural and safety data within the deadline.

We have not been successful in the permanent recruitment of the Building Safety Manager however we do not expect this to have an impact on any of our deadlines. We have commissioned a Building Safety Case pilot with consultants Penningtons Ltd which has taken longer to complete than we anticipated. We have now received advanced warning that the regulator will be requesting three Building Safety Cases before the end of October. Fortunately, one Safety Case is complete as it was one of the pilots and the other two have been passed to Penningtons Ltd for completion.

The team took a precautionary approach and registered all 6 storey blocks as high-risk blocks, however since meeting with Pennington they have advised that some of our blocks may not reach the high-risk criteria. Therefore, we have commissioned a height survey of all 6 storey blocks to confirm if they are 18m or more. The likely outcome will be that the number of high-risk buildings we manage under the Build Safety Act definition will reduce.

Meetings are being held with consultants to assist the Council in determining how to receive, use and manage Building Information Management information. The Building Safety Engagement Strategy has now been signed off and published.

| Risk Scores | I | L | T | Trend |
|-----------------|----------|----------|-----------|-------|
| <i>Previous</i> | 5 | 2 | 10 | |
| CURRENT | 5 | 2 | 10 | |
| <i>Target</i> | 5 | 1 | 5 | |

Key Controls and Mitigating Actions

- Monthly FLAGEL compliance reporting to DMT.
- Fortnightly Building Safety Working group meetings where Director of Housing Services has a standing invite.
- CMT Periodic reporting, latest 17 July 2024 Housing Improvement Plan.
- Monthly contractor meetings
- Fortnightly meeting with quality management consultants
- Centralised compliance system covering FLAGEL and other area of compliance

Action Plan – Non-compliance with Statutory Housing Duties

| Ref | Action | Target Date | Responsible Officer | Status |
|--------------------------------------|--|---------------|--|-------------|
| Follow-up of Previous Actions | | | | |
| 1. | Embed process for updating the vulnerable tenants list in secure boxes and providing evacuation information directly to all residents every 12 months. | March 2024 | Head of Customer Services Housing | In Progress |
| 2. | All compliance information is uploaded to True Compliance | January 2024 | Building Manager | Completed |
| 3. | Link True Compliance to Business Objects so reporting can be made easier | February 2024 | Resident Data Team Manager | In Progress |
| 4. | Provide building safety case reports for all high-risk buildings | April 2024 | Building Manager | In Progress |
| 5. | Agree a joint strategy corporately for all new buildings to ensure Golden Thread/BIM information is available to HMS through one system | March 2024 | Head of Capital Delivery | In Progress |
| New / Proposed Actions | | | | |
| 1. | Northgate and True Compliance Integration | October 2024 | Asset Manager/ Applications Support Lead | In Progress |
| 2. | Re - measurement of 6 storey blocks | August 2024 | Major Works and Refurbishments Manager | In Progress |
| 3. | Recruit to key posts in the Building Safety structure | October 2024 | Head of Housing Property Services | In Progress |
| 4. | Prepare evacuation plans for High Rise Blocks | January 2025 | Head of Housing Property Services | In Progress |

N. Contract Management

There is a risk that due to operational, commercial, environmental or relationship issues, an important, high profile front line service may start to fail causing reputational problems for the council.

Sponsor: Corporate Community Health and Wellbeing

Risk Update

Internal Audit have reviewed the Contract Management tools and operational performance and provided some recommendations.

A joint paper with Procurement was taken to CMT to review and agree next steps in December 2022. The paper set out various options. CMT agreed to the option of creating a Strategic Contracts Register, where evidence of contract performance will form part of the Annual Procurement Strategy report. A further paper was taken to CMT in May 23 providing a list of contracts that would form part of the Strategic Contracts Register and this was formally agreed.

A report has been taken to the Commissioning and Procurement Board in July 24. Thereafter it will be presented to CMT in September 24.

The latest version of Councils Contract Register has been updated and is shared with approved officers within the Council. A new process has also been implemented via MS Forms where the Procurement team can formally make changes and add to the contracts register. This process is also available to wider council to ask for changes to be made to the register if any errors are identified.

The Procurement Bill has now received Royal Assent. There are various aspects in the new Act related to transparency and how we manage our contracts, including making the public aware of how our key contracts are performing with various obligations that the Council would need to adhere to.

Now Royal Assent has been given it is anticipated to go live October 2024. The Procurement team have a working group that will work on ensuring the various aspects of the Act are understood and accommodated as part of our processes in readiness of when the provisions go live.

During Q3 /Q4 of FY 24/25 the Procurement Implementation Working Group will update the necessary documents agree the Open and Flexible format in the short term in line with the Procurement Act and provide training to the Council prior to the Act going live Oct 28th2024. Thereafter develop and build in further knowledge and guidance within our documentation as Procurements are undertaken under the new regime looking at ways to use the Flexible procedure to support Council priorities.

| Risk Scores | I | L | T | Trend |
|-----------------|----------|----------|----------|---|
| <i>Previous</i> | 3 | 3 | 9 | |
| CURRENT | 3 | 3 | 9 |  |
| <i>Target</i> | 3 | 3 | 9 | |

Key Controls and Mitigating Actions

- The contract management framework has been reviewed, revamped and updated.
- A Gateway 4 process has been agreed to review commissioning intentions to determine if there are any opportunities through decommissioning, economies of scale or bottom-line savings that can be delivered.
- The Commissioning and Procurement Board to continue to review contracts that will expire or need extending prior to March 27.
- Reconciliation of the Contracts register, and Online register to ensure all the contracts published online are on the Contracts register.
- The Procurement Implementation working group are attending various workshops, meetings and conferences related to the new Procurement Act.
- Segmentation of contracts.
- A contract review template was created and signed off for 'Gateway 3'. This is conducted at the mid-term period of a contract valued above £2m and assesses if suppliers are adhering to the performance KPIs / outcomes set out in the contract and if we should be looking to invoke the extension clauses when they come up.
- All contracts that require a Gateway 3 and 4 will need to be presented at the Commissioning and Procurement Board for comments and agreement.
- Each Directorate are sent their extract of the Contracts Register for review and feedback on a quarterly basis for feedback and sign off.

Action Plan – Contract Management

| Ref | Action | Target Date | Responsible Officer | Status |
|--------------------------------------|---|-------------|---------------------|-------------|
| Follow-up of Previous Actions | | | | |
| 1. | Work with the various stakeholders across the Council to gather evidence to support good contract management is being undertaken across our Strategic Contracts Register. | July 23 | Head of Procurement | Completed |
| 2. | Ensure Procurement are prepared to implement the requirements of the new Procurement Act. | Oct 24 | Head of Procurement | In Progress |
| 3. | Undertake a second round of Gateway 4 reviews of contracts due to be procured. | Ongoing | Head of Procurement | In Progress |
| 4. | Undertake a session with the Commissioning Network relating to contract management requirements and good practice. | Ongoing | Head of Procurement | In Progress |
| New / Proposed Actions | | | | |
| 1. | Provide training and guidance for the new Procurement Act. This will be delivered and incorporated into the existing Procurement beginners and Advanced Training set up on the learning and development portal. | Sep 24 | Head of Procurement | In Progress |