



Strategic Risk Register

March 2025

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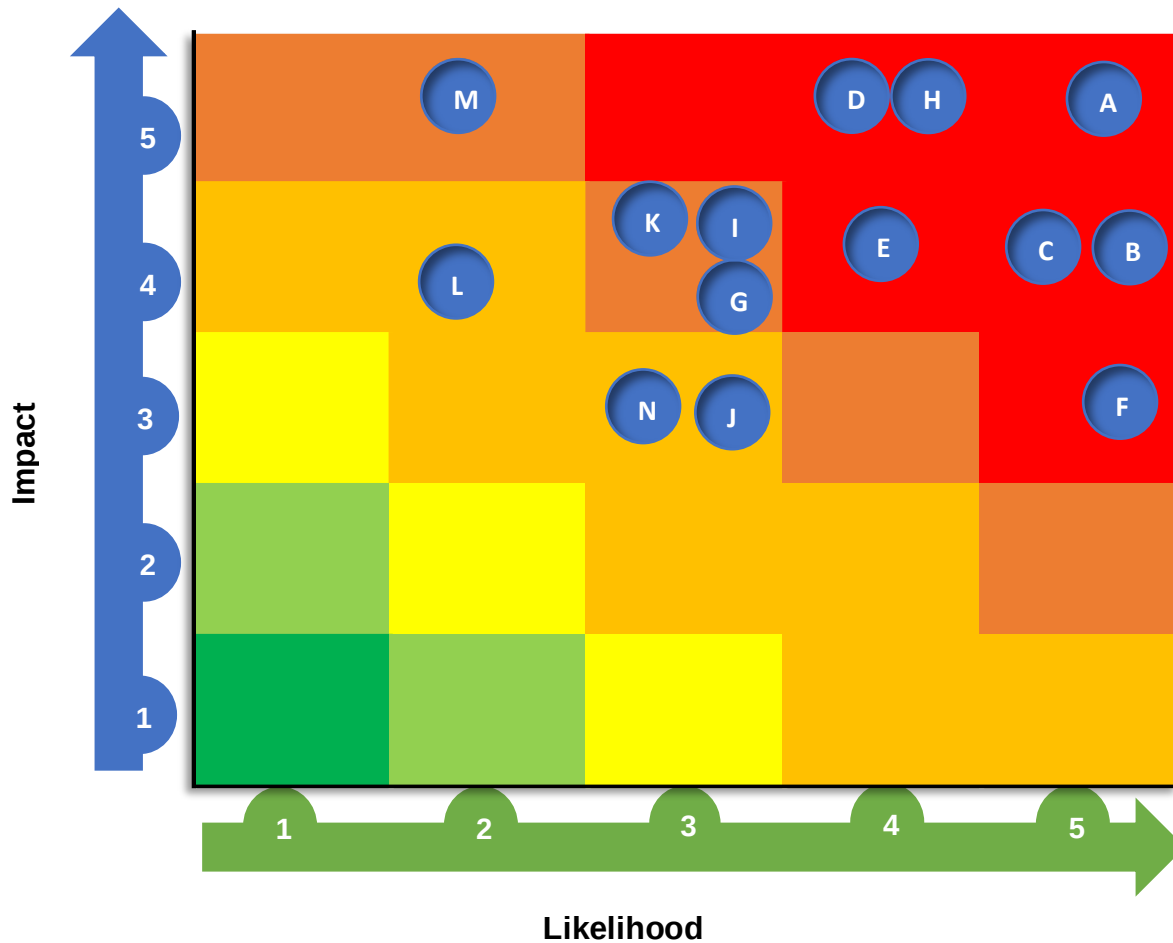
1. Risk Evaluation Matrix

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)	25 (I:5 L:5)	↔	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)	20 (I:5 L:4)	↔	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	12 (I:4 L:3)	16 (I:4 L:4)	↓	12 (I:3 L:4)	=
H.	Financial Resilience and Sustainability	20 (I:5 L:4)	15 (I:5 L:3)	↑	5 (I:5 L:1)	+15
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	9 (I:3 x L:3)	12 (I:3 x L:4)	↓	6 (I:3 L:2)	+3
K.	Emergency Preparedness, Response and Recovery	12 (I:4 x L:3)	12 (I:4 x L:3)	↔	9 (I:3 L:3)	+3
L.	Safeguarding Incident- Adults	8 (I:4 x L:2)	12 (I:4 x L:3)	↓	8 (I:4 L:2)	=
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 = 5,951 total applications) to 2023/24 (4,141 singles + 3,159 families = 7,300 total applications). The demand from homeless households from 1 April 2024 to 31 December 2024 was 5,094 (2,846 from single people and 2,248 from families), an average of 131 applications per week. If demand remains the same this would result in a total of 6,797 applications for the year, a 7% reduction on the 2023/24 total number of applications.

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.

The Renters' Rights Bill is currently undergoing its Second Reading in the House of Lords and is expected to become law by summer 2025. One of the most significant changes under the Renters' Rights Bill is the abolition of Section 21, often called "no-fault" evictions. This reform means landlords will no longer be able to end tenancies without providing a valid, legally defined reason, such as rent arrears, anti-social behaviour, or a desire to sell the property. It is therefore hoped that demand from homeless households will continue to decrease following the implementation of the enactment of the Bill

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	Comments
Follow-up of Previous Actions – October 2024					
1.	To continue delivering the New Council Homes Programme to increase supply of affordable homes.	March 2025	Senior Development Manager	In Progress	35 properties forecast to be delivered in 24/25 Forecast for 899 properties to be delivered in 25/26
2.	To continue to acquire street properties through i4B.	March 2025	Strategy and Delivery Manager	In Progress	35 properties acquired as at 6 February 2025 Forecast for 24/25 is 39 properties acquired
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	Target date for delivery is September 2028.
4.	To continue to work with Private Sector property owners to procure affordable accommodation.	March 2025	Service Manager Accommodation Services	In Progress	295 PRS properties procured and let as at 10 February 2025 Forecast for 24/25 is 340 properties procured
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	The Housing Options Team hold monthly surgeries for all families who have applied as homeless in the previous weeks to promote the find a place you can afford campaign
6.	To bring empty properties on the South Kilburn Regeneration scheme back into use as TA.	September 2024	Director Inclusive Regeneration and Employment	Completed	An additional 46 families have moved out of TA into newly refurbished South Kilburn flats.
7.	To continue membership of Capital Letters to access affordable PRS accommodation through Storm Housing Group	March 2025	Director Housing Needs and Support	In Progress	Confirmation of the scheme going ahead will be announced at the Capital Letters Board Meeting 25 March 2025
8.	New Communications Campaign to manage expectations	September 2024	Head of Communications	Completed	Action completed.
9.	New scheme to help large families resettle in cheaper areas of the UK	March 2025	Director Housing Needs and Support	In Progress	As at 10 February 2 x families secured accommodation
New / Proposed Actions					
1	Implementation of Rough Sleeping Risk Assessment Tool	May 2025	Director Housing Needs and Support	In Progress	Prevention tool to help early identification of rough sleeping
2	Subscription to Locata Training Academy	June 2025	Director Housing Needs and Support	In Progress	Online training product to be rolled out to all front line staff
3	Relocation of Housing Options Service to New Horizons Centre	March 2025	Director Housing Needs and Support	In Progress	New model for Housing Options assessments collocated with adult support services

B. Cost of Living Crisis

The cost-of-living crisis caused by rising inflation and low wage growth has been impacting Brent resident since the removal of Covid restrictions. This was further exacerbated by the Russian invasion of Ukraine pushing up further energy and food prices with inflation peaking at 11% in October 2022. This has coincided with lower wage growth effectively driving more families and households 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 energy prices are continuing to increase. 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. Service demand continues to rise with pressures on adults' and children's social care. Pressure on the homelessness service has also increased considerably, with the number of homelessness applications up from 5,948 in 2021/2022 to more than 7,300 in 2023/2024. In the 10 months from 1st April 2024 to 31st January 2024, 5,642 homelessness applications have already been received, with an average of 133 applications per week. The increase in homelessness is also causing budgetary pressure for the Council. As we navigate ongoing challenges of delivering essential services amidst rising costs and growing financial pressure, and to ensure financial sustainability and target support where it is needed, the Council has agreed a revised Council Tax Support (CTS) Scheme 2025-26 with a standard 35% minimum payment for working age households. The Council recognises this will impact all working age households, to varying degrees dependent on financial and personal circumstances.

The support services we have in place, including food and fuel support and the Resident Support Fund (RSF), are continuing to be well used. Between 1st April 2024 and 31st January 2025, the RSF has supported 3540 customers with £4,060,935. Support has been provided for household bills, Council Tax, food, fuel, digital equipment and emergency funds. A further 551 customers have been supported through digital support.

Information on the new CTS scheme and hardship fund is available on a redesigned webpage. Targeted communications will also be sent out to existing residents on CTS as soon as the new scheme is approved by Council. The actions and resources making up the hardship scheme for working age residents and comprises the following main elements of direct hardship relief (13A) policy, communications, staff and partner briefings, self-service online support, face to face and phone contact, recovery Process and enhanced.

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. Since 1st April 2024, 375 consultations have been undertaken as part of the Well and Warm Scheme.
- As part of the Cost-of-Living Outcome Based review and following successful pilots, a number of interventions have been approved as part of a longer-term support model for the next three years. This includes a Community Wellbeing Service, Debt Advice Service and Immigration Advice Service.

The government extended Household Support Funding (HSF) from 1st October 2024 until 31st March 2025. Brent's allocation is £2.8m, with £808k dedicated to the RSF and remaining funds allocated to supporting families with children and vulnerable groups, as well as various community projects including the Community Wellbeing Service providing food and wraparound support, Debt Advice, Well and Warm Scheme and others. Since 1 April 2024, the Well and Warm Scheme has completed 375 consultations providing much needed energy support and advice. The funding is due to end on 31st March 2025 and the future of the fund is currently uncertain. We are likely to hear an announcement from Government regarding the HSF in late March 2025, and a potential extension or amount of Brent's funding are unknown at this stage.

Demand for support from Brent Hubs remains high. Most common needs which residents present with at the Hubs are form filling such as Housing, Council Tax Support and RSF applications (22%), food and fuel aid enquiries (18%), housing and homelessness enquiries (13%), Council Tax (11%), welfare benefits (11%), and other presented needs (25%), such as, housing benefit, debt and money enquiries, employment, general support and immigration. The overall trend in the past 12 month is increasing demand, with a more gradual and upward trend.

A new approach to resident support was agreed by Cabinet in February 2024, focused on providing residents with the tools and support to improve their situation in the longer term. The new Resident Support Fund came into effect from 1 April 2024 and the enhanced Community Wellbeing Service (CWS) launched from the New Horizons Centre in December 2024. The CWS is a partnership between the Council and Sufra NW London, building on its successful pilot phase to support low-income households with access to affordable groceries, healthy meals and a comprehensive programme of holistic support. The CWS is co-located with other services including Brent Hubs and Housing, with residents also able to access Debt and Immigration advice, employment support and much more on site. The expanded model is now open to all eligible Brent families, includes an extended membership length of 6 months (previously 3 months) to improve longer-term outcomes and work readiness, and will upscale to a 5 day-per-week service, providing a robust safety net.

- Cabinet will consider a revised 13A policy at its meeting on 10 March 2025. The policy proposed will be available to fund of £1.5m further reductions in Council Tax support for those in particular hardship.

B. Cost of Living Crisis - Action Plan

Ref	Action	Target Date	Responsible Officer	Status	Comments
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	The model was approved by Cabinet in February 2024.
2.	To implement the new approach.	November 2024	Head of Change and Customer Insight	Completed	The key element of the model, the Community Wellbeing Service, launched in December 2024. The Immigration Advice Service commenced in October 2024 and Debt Advice Service in December 2024.

3.	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	Completed	The HSF allocation and distribution for 1 October 2024 – 31 March 2025 was agreed in October 2024.
4.	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	The Employment and Skills OBR and testing of the pilot informed an improved employment offer at the expanded CWS including an extended 6-month membership to improve work readiness.
5.	To consider and agree how to best utilise any extension (tbc) of the Government's Household Support Fund for 25/26.	March 2025	Head of Customer Services and Assessments	In progress	The funding allocation for the Household Support Fund is yet to be announced for 2025/26. In 2024/25 the Council received £5.56m, but it is anticipated that a reduced amount will be received in 2025/26. The Household Support Fund expenditure is restricted to the funding made available by government. Any allocation of HSF will intend to mitigate the worst impacts of proposed new CTS scheme.
6.	To monitor and review impacts of the new model of resident support.	December 2024 - onwards	Head of Customer Services and Assessments	In progress	The model was approved by Cabinet in February 2024, quarterly monitoring takes place and annual report on impact of RSF will be completed , and also submitted to DWP.
7.	To test a new Market Rent Reduction Framework (informed by Employment and Skills OBR) designed to reduce market rent for local VCS organisations, reflecting the value their proposed use of the premises may bring to the local community.	February - April 2024	Head of Customer Services and Assessments	In progress	The framework was approved for testing with the letting of 3 premises.

New / Proposed Actions

No new actions proposed at this stage.

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., £1.4m in 2024/25 and £1.5m in 2025/26. 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.

As a result of these initiatives, the cost avoided equated to £2m in 2023/24 and is forecast to be £2.5m 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 £2.9m deficit to the current forecast deficit position of £0.4m. However, cost avoidance continues to be required over the next 3 years, despite anticipated increases in HNB funding of 6% in 2025/26 and 3% thereafter. Changes in practice and new reforms to the local SEND system following analysis of the impact of pilot projects delivered through grant funding from the Department for Education Delivering Better Value Programme will contribute to the efficient use of the High Needs Block to support children's and young people's needs.

The assumptions in the Management Plan assume 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 £4m by 2026/27. However, recent intakes into primary school are highlighting the increasingly complex needs of young children and demand for EHCPs is likely to continue 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 was extended until 2025/26. A range of agencies (LGA, ISOS, NAO) have raised concerns with the new government about the sustainability of the current national SEND system. National reforms are anticipated but it is not yet known how they might impact on Brent.

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.
- Embedding new system changes building on pilot projects from 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	Update
Follow-up of Previous Actions					
1.	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 2024/25 – 2026/27. 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.	March 2026	Head of Inclusion/ Head of Capital Programmes	In progress	Update February 2025: 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. A second phase of projects is currently in development using spare capacity in primary schools. Consideration is also being given to new Special School satellite provision.
2.	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.	September 2025	Head of Inclusion	In progress	Update February 2025: Development of system changes building on successful pilot projects is underway in partnership with schools. A new approach to cost banding in mainstream schools has been implemented from December 2024.
3.	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.	September 2025	Head of Inclusion	In progress	Update February 2025: this is ongoing. SEN support activity is embedded into ways of working with schools and will be reviewed with headteachers in spring 2025.
4.	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	Update February 2025: The Inclusion Service will be working with headteachers to develop new approaches building on DBV pilots to be implemented from September 2025.
5.	Continued Central Government lobbying for appropriate funding	September 2025	Corporate Director, CYP	In progress	Action remains in progress.
New / Proposed Actions					
No new actions proposed at this stage.					

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 violent disorder in Brent. Unchecked tensions can result in a breakdown in community cohesion and provide permissive environment for prejudice and extremism to thrive.

The aftermath of the Israel-Gaza conflict since October 2023 has led to an increase in hate crimes, notably anti-Semitism and Islamophobia, reflecting heightened tensions within local communities.

The UK national threat level for Terrorism remains substantial and Brent experience complex risks and challenges, including persistent threats from extremist groups. Brent has received targeted Home Office funding to respond to the risks of radicalisation. Ministry of Housing, Communities & Local Government (MHCLG) has also undertaken an assessment and has identified Brent as one of the priority boroughs to offer community cohesion funding.

Risk Scores	I	L	T	Trend
<i>Previous</i>	5	4	20	
CURRENT	5	4	20	
<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. Ensure 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	Comments
Follow-up of Previous Actions					
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	Completed	Brent has been awarded one-off MHCLG revenue funding of £55K for community sector-led projects to improve community cohesion.
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.	March 2026	Community Engagement and Social Infrastructure Manager	In Progress	Community tensions are discussed at every forum and measures are put in place in partnership with the police to coordinate a response as required. £10k is allocated to the forum in support of the delivery in line with the borough priorities. Brent Connects is often used by internal services to provide residents with the reassurance of the preventative measures in place to address community tensions.
New/Proposed Actions					
1.	Deliver Community Cohesion and Hate crime projects by June 2025. These projects are: 1. Community Sports Culture and Cohesion Tournament 2. Hate Crime Schools Programme and 24/7 Third-party reporting line 3. Hate Crime Community Capacity Building Project	April 2025 to June 2025	Community Engagement and Social Infrastructure Manager	In Progress	Two Cultural Celebration Days will be delivered by the end of June to help build community relationships and support work to prevent harmful narratives which divides communities.

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 Climate Adaptation and Resilience Plan as part of the 2021-22 Climate Strategy Delivery Plan, with a final version published in June 2022. 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. 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 several 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 Climate Adaptation and Resilience plan is being reviewed and in order to align with the adoption of the borough's new Flood Risk Management Strategy, is scheduled to be updated and adopted in spring 2025. The key risk remains that implementing the recommended actions is dependent on funding, and funding for adaptation work is severely limited at the scope and scale required, while there is a lack of external funding programmes available for climate adaptation and resilience measures. There is also risk that people who live and work in Brent, including vulnerable residents, remain unaware and ill prepared to keep themselves safe and well in the face of adverse climate impacts.

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.
- The council is part of the London Councils' Resilient and Green working group, which focuses on best practice for climate adaptation. This working group is part of the overarching pan-London climate programme.

Climate Emergency (Adapting to climate risks) - Action Plan

Ref	Action	Target Date	Responsible Officer	Status	Comments
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 Communities and Climate Action	Completed	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 Communities and Climate Action	In Progress	This is now expected to complete in spring 2025, in alignment with the borough's new Flood Risk Management Strategy
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 Communities and Climate Action	Completed	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 Communities and Climate Action	Completed	This has been superseded by Brent's involvement in the London Councils' Resilient and Green workstream. London Councils have produced a suit of toolkits and materials for boroughs to utilise on adaptation and resilience
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 Communities and Climate Action	In Progress	Action remains 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 Communities and Climate Action	Not Yet Commenced	This will be initiated once the plan has been updated. It is possible that adaptation actions may be integrated into existing workstreams as opposed to a standalone grouping.
New / Proposed Actions					
No new actions proposed at this stage.					

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 reasonable in our gift to aim for carbon neutrality by 2030 and work with government to achieve the national 2050 target. Demonstrating progress in reducing local authority emissions is 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% 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 deliver all possible carbon reduction measures 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.
- A new climate programme for 2024-26 was adopted by Cabinet in October 2024.
- We are in the process of finalising and publicly launching a new 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	Comments
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 Communities and Climate Action	Completed	The actions carried over from the 2022-24 programme have been incorporated into the 2024-26 programme and will be monitored accordingly.
2.	To review and develop plans for South Kilburn and St Raphael's Estate (development-led Green Neighbourhoods)	October 2024	Head of Communities and Climate Action	Completed	Adopted by Cabinet in October 2024.
3.	To undertake a review of effectiveness of our current Green Neighbourhoods programme	Summer 2024	Head of Communities and Climate Action	Completed	Officer review undertaken and fed into the refresh of the programme for 2024-26.
4.	To develop the new 2024-2026 Climate Programme	October 2024	Head of Communities and Climate Action	Completed	Adopted by Cabinet in October 2024.
5.	To implement the 2024-2026 Climate Programme	October 2024	Head of Communities and Climate Action	In Progress	Action remains in progress.
New / Proposed Actions					
1.	To review and benchmark Brent's carbon emissions from the 2023 DESNZ statistics when these are released in summer 2025.	August 2025	Head of Communities and Climate Action	Not yet started	Action will commence once statistics are released in Summer 2025.

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.

In January, we onboarded our endpoint detection and response service, which monitors all laptops and identities 24x7. If any behaviour is identified that is abnormal, we can isolate the laptop or identity in question whilst we investigate. This reduces the impact of an attack becoming more widespread across the network. Also, we have made significant progress in the reduction to known vulnerabilities across the estate.

Risk Scores	I	L	T	Trend
<i>Previous</i>	4	4	16	
CURRENT	4	3	12	
<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, with 3 more planned for 2025.

Action Plan – Cyber Attacks

Ref	Action	Target Date	Responsible Officer	Status	Comments
Follow-up of Previous Actions					
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	Action 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	Completed	Action completed
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 (and ongoing)	Action completed – with further exercises planned.
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	Action in progress.
5.	Carry out independent peer reviews of Tier 1 systems.	March 2025	Chief Security Officer	In Progress	Action in progress.
6.	Test disaster recovery of key line of business systems – this is a continual plan.	Ongoing	Deputy Director Operations	Completed (and ongoing)	Action completed – with further exercises planned.
7.	Obtain supply chain cyber security assurance from application vendors. We have assessed the risk levels for each of our key suppliers and we are sending out relevant questionnaires for each to complete.	March 2025	Cyber and Compliance Manager	In Progress	Action in progress.
New/Proposed Actions					
No new actions proposed at this stage.					

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

Between 2010 and 2025, Brent has delivered total cumulative savings of £218m. In February 2024, Council agreed the budget for 2024/25, which included £4.4m of savings to be delivered in 2025/26. Subsequently, due to ongoing high demand for temporary accommodation, at the July MTFS update to Cabinet a further £30m gap was identified for the period 2025/26 to 2027/28, with £16m of this gap falling in 2025/26. As a result of this, the budget for 2025/26 approved by Full Council in February 2025 included an additional £4.5m of service area savings (taking the total for 2025/26 to £8.9m), a revised Council Tax Support Scheme (approved separately), generating a net additional £5m of Council Tax income for Brent's budget and £6.5m of operating efficiencies to be delivered by services in 2025/26. These additional savings will take the total cumulative savings to £238m by the end of 2025/26. 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, low growth in the economy, increased demand for key services, the effects of the cost-of-living crisis and uncertainty in government funding.

The 2025/26 Local Government Finance Settlement was the seventh annual one-year settlement for local government, although the government has signalled their intention to deliver a multi-year settlement for 2026/27 as part of wider reforms to local government funding. As part of these reforms, the government has also confirmed that they will undertake a reset of the business rates retention system for the first time since the system was introduced in 2013. These fundamental reforms will provide greater certainty for the MTFS, but at present there continues to be a high-level of uncertainty, with very little detail having been provided and multiple consultations on the reforms expected during 2025/26. Therefore, there is a risk that the outcome of the reforms will be negative for Brent Council and result in a need for more savings in future years. The government have confirmed in multiple statements and policy papers since the general election in July 2024 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. This risk has been increased by recent geopolitical events which have dictated a sharp increase in spending on defence at a time when the economy is not growing as fast as was predicted by the Office for Budget Responsibility when the government set out the Autumn Budget.

Risk Scores	I	L	T	Trend
<i>Previous</i>	5	5	15	
CURRENT	5	4	20	
<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.

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 £17.4m pressure as of Quarter 3. This current forecast overspend represents over 4% of our net budget. This is close to the level of 5% that the Council decided should be held as generally usable reserves 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, but ongoing pressures in the homelessness budget have seen the overspend increase from £13.5m at the outturn for 2023/24. In recognition that this pressure is ongoing and are not likely to reduce in the immediate future, significant additional growth for temporary accommodation costs of £11.6m has been built into the 2025/26 budget. Together with an additional £3.4m of Homelessness Prevention Grant provided by MHCLG, the total increase to the homelessness service budget to address these pressures in 2025/26 is £15m. The need for this budget strategy was reinforced by the external auditors as part their annual value for money report.

The Budget Assurance Panel introduced a range of measures including proactive vacancy management, directorate led targeted non-essential spending controls 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. These meetings have also been helpful in ensuring departments are horizon scanning to inform future budget strategies. Given the current forecasted overspend, these spending controls will continue throughout the remainder of 2024/25 and into 2025/26. However, it was clear that further actions were necessary, including a new requirement for services to deliver in-year savings, of which £8m has been identified, in addition to the £8m of savings already being delivered during 2024/25. Services have been required to report to CMT monthly on the progress with delivery of the in-year savings.

As part of the February 2025 Budget & Council Tax report, an update on the MTFS position for 2026/27 to 2028/29 was provided. The worsening outlook for the economy and the continuing pressures facing Council services led to an increased savings requirement being identified for future years, totalling £28m split evenly across the three years. Identifying and delivering this level of additional savings will be a significant challenge for the Council's services, but it is considered to be a necessary step to ensure that the Council's budget can be returned to a sustainable position. 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.

Finally, the Corporate Peer Challenge put forward a number of recommendations to improve the financial management of the Council. This included conducting detailed unit cost analysis and benchmarking to identify cost savings opportunities, and horizon scanning. These recommendations have been accepted and will be incorporated into the budget strategy for 2026/27-2028/29.

- 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	Comments
Follow-up of Previous Actions					
1.	To continue the ongoing robust budget monitoring regime and framework.	Ongoing	Deputy Director of Finance	In Progress	Monthly budget monitoring has been carried out throughout the year and reported to Cabinet in July, October and January
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	Regular updates have been provided to Budget Assurance Panel throughout the year
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	The existing expenditure controls are under continuous review and new controls are proposed when the need arises and implemented without delay
4.	£10m in-year savings target for 2024/25	March 2025	All Corporate Directors	In Progress	£8m of in-year savings have been identified and are on track to be delivered by services in 2024/25
5.	Monthly CMT monitoring of progress with in-year savings	March 2025	All Corporate Directors	In Progress	CMT has received monthly updates on the progress of the in-year savings
New / Proposed Actions					
1.	To engage with the government's consultations on local authority funding reform and to model scenarios for the outcome of the reforms, providing an update to Cabinet by Autumn 2025 in advance of the draft budget for 2026/27	Autumn 2025	Deputy Director of Finance	In Progress	A response was provided to the initial consultation on the principles behind the reforms from the government

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 CYP**

Risk Update

The Council's most recent annual self-evaluation of practice against the Ofsted ILACS framework continues to judge as 'good' the local authority's early help and social care provision for children. A Practice Improvement Plan is in place to ensure that the service continues to improve. A robust case file audit process is in place and quarterly Quality Assurance updates are provided to senior leaders to understand the quality of practice. Inspection preparation is underway for an expected Focused Visit by Ofsted within the next 6 to 7 months (by September 2025). The next self-evaluation of practice will be completed in the autumn (2025).

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 are in place. A re-design of Early Help and Children's Social Care that aligns with the DfE Family First Partnership Programme. This programme outlines a series of national improvement initiatives that will take place by April 2026.

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.

Sufficiency of supply of qualified social workers remains a national issue of concern with local authorities relying on agency social work staff to cover vacancies. However, 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 being implemented. At a local level there has been an increase in permanent staffing levels and a reduction in agency staff numbers in the last 12 months which contributes to strengthened assurance. 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 the Establishment Board, chaired by the Director, Early Help and Social Care, monitors spend against established posts with controls in place to ensure all recruitment is managed within agreed procedures. This continues to provide a grip on recruitment and provides opportunities to target agency staff for agency to permanent recruitment, as well as helping to shape recruitment campaigns in specific difficult to recruit areas.

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	Completed
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	Completed
5.	Targeted recruitment campaigns and continued focus on agency to permanent recruitment.	March 2025	Director Early Help and Social Care	Completed
6.	Continued tighter financial management controls.	March 2025	Director Early Help and Social Care	Completed
7.	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
8.	Continue implementation of the quality assurance programme and learning events	March 2025	Head of Safeguarding and Quality Assurance	Completed
9.	Ensure Working Together 2023 partnership arrangements fully implemented	December 2025	Corporate Director Children and Young People	In Progress
New/Proposed Actions				
1.	DfE Family First Partnership Programme implementation in Brent CYP	April 2026	Director of Early Help and Social Care	In Progress
2.	Implementation of the quality assurance programme and learning events	April 2026	Head of Safeguarding and Quality Assurance	In Progress
3.	Continue targeted recruitment campaigns and continued focus on agency to permanent recruitment.	April 2026	Director of Early Help and Social Care	In Progress
4.	Continue learning on complex and high profile cases within service areas and within the existing safeguarding partnership structures.	April 2026	Head of Safeguarding and Quality Assurance	In Progress
5.	Continued to ensure budget savings and targets are met and monitored monthly.	April 2026	Director of Early Help and Social Care	In Progress

J. Recruitment and Retention

Failure to recruit and retain sufficient permanent staff to critical roles leaves services without qualified staff which negatively impacts services and creates overreliance on agency/interim staff.

Sponsor: Corporate Director Law and Governance

Risk Update

Two Resourcing Business Partners (Aug 2024 and Jan 2025) and a Social Media and Digital Adviser (Aug 2024) appointed and new staff structure implemented. Resourcing Business Partner service has supported successful appointments to range of roles across a large housing campaign (c45 vacancies) and two Capital Project Managers. Established stronger links with Children & Young People to support workforce planning and trialling different recruitment approaches. Early 2025 increased promotion of Resourcing Business Partner through the sharing of agency data with CMT colleagues; as a result, we are developing recruitment plans for the inhouse team to directly source for hard to fill Lawyer roles, currently filled by agency workers. Key aim of the Resourcing Business Partners is to build relationships with Service Areas to help develop impactful solutions to overcome their recruitment and retention challenges.

In January 2024 enhanced internal controls were implemented to govern the use of temporary agency workers; new requests, extensions for existing workers and requests to pay above the graded pay rate, all require approval from the Corporate Director or Director. Savings have been achieved through the ongoing initiative to reduce agency Social Worker headcount and spend through conversions to permanent employment. The introduction of a tenure savings mechanism (May 2024) allows discounts for long-term placements (at 6 and 12 months) which has also contributed to some savings. In December 2024 reported at Budget Assurance Panel over 11 months (from Jan to Nov 2024) there was a 30% reduction in spend and headcount. The appointment of a new Senior Resourcing and Recruitment Manager increased strategic capacity to improve contract management and performance monitoring.

Focus has been on maximising job promotion on social media. Enhanced LinkedIn licences in place for Resourcing Business Partners to proactively target and approach candidates for live vacancies. Team are maximising use of LinkedIn job slots so key vacancies are promoted to improve attraction. In addition to utilising the Council's corporate social media channels to advertise and promote Brent's local graduate recruitment scheme, have introduced 'job of the week' to promote opportunities via the Council's LinkedIn channels.

The Recruitment and Resourcing Service currently being audited by the Internal Audit team. The review scope covers the end-to-end recruitment process. Due to be concluded April 2025 and formal feedback provided will be prioritised for implementation.

Risk Scores	I	L	T	Trend
<i>Previous</i>	3	4	12	
CURRENT	3	3	9	
<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 being devised across Service Areas
- We have Managed Service Provider 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 the Council's policies in relation to market supplements and other R&R allowances.	April 2025	Policy & Projects Manager	Not Yet Commenced
3.	Review controls in respect of agency staff pay rates	Ongoing	Senior Recruitment & Resourcing Manager	In Progress
4.	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	In Progress
New/Proposed Actions				
1.	Work with web team to review and implement changes to external website to better promote Brent Council as a place to work and stay. Starting with the launch of new corporate values on our external careers page.	Ongoing	Senior Recruitment & Resourcing Manager	In Progress
2.	Work with Service Areas to design resourcing strategies to overcome current challenges recruiting to specialist and hard to fill roles	Ongoing	Senior Recruitment & Resourcing Manager	In Progress
3.	Conduct competitive tender of Managed Service Provider contract with Comensura, expires February 2026. Tender process goes live in March 2025 with contract decision made August 2025.	Ongoing	Senior Recruitment & Resourcing Manager	In Progress
4.	To support reduction in agency spend, focus on use of high-cost interim agency workers and the promotion Comensura to reduce costly direct sourcing. Rollout training to agency worker managers on use of c.net portal and process approvals for new and existing agency workers.	Ongoing	Senior Recruitment & Resourcing Manager	In Progress
5.	Produce reports to review metrics and to assess effectiveness of campaigns where social media is being optimised	Ongoing	Senior Recruitment & Resourcing Manager	Not Yet Commenced
6.	Linked to the new People Strategy which sets out set HR&OD ambitions, produce Action Plan for Recruitment and Resourcing to set out service delivery plan, improvements and implementation.	Ongoing	Senior Recruitment & Resourcing Manager	Not Yet Commenced
7.	Design and trial feedback approaches with candidates and new joiners regarding their end-to-end recruitment process and onboarding experience. Recruitment and OD to collaborate proactively in reviewing and enhancing the new joiner experience based on feedback. Rollout corporate approach.	Ongoing	Senior Recruitment & Resourcing Manager/OD 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, the recommendations from which have been progressed alongside the annual self-assessment of Resilience Standards for London (RSLs) and more recently a self-assessment against the Grenfell Tower Fire Inquiry Phase 2 Report, which has identified further actions needed to improve the Council's arrangements. These actions sit across a range of services and support the drive to shift the organisational culture to one where resilience is everyone's business.

The EP&R team is now fully resourced with four FTE and has been fortunate to have a graduate placement within the team, providing additional capacity. 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. Recruiting people to fulfil these roles has been a challenge in recent years, but we are starting to see the impact of some different approaches to recruitment and an interim uplift in the standby payment the volunteers receive which had been at the same rate for over 10 years.

The Council now has 4 officers trained to undertake the Humanitarian Assistance Lead Officer (HALO) role, supported by approximately 20 staff trained to provide Humanitarian assistance. Housing have also committed to train their staff at Emergency Centre Officers, which will significantly boost the resource in this area. Between March 2025 and May 2025, the Council will be training additional Gold and Silver to ensure these rotas are resilient.

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	Comments
Follow-up of Previous Actions					
1.	Complete implementation of recommendations from external review.	March 2025	Emergency Planning and Resilience Manager	In Progress	Work ongoing to implement the remaining actions. Some of the remaining tasks overlap with the Grenfell action plan (below).
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	Good progress made via SMG and a number of new volunteers.
3.	Review Governance Structures for EP&R internally.	March 2025	Emergency Planning and Resilience Manager	In Progress	Work remains ongoing, though good progress made with coordinating with Housing.
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.	September 2025	Emergency Planning and Resilience Manager	In Progress	This work has commenced and will be a key focus for the team in 2025. Also overlaps with the Grenfell action plan.
New/Proposed Actions					
1.	Oversee the implementation of the 51 recommendations identified as part of the Grenfell Inquiry review and continue to take opportunities to identify further areas of improvement.	March 2026	Emergency Planning and Resilience Manager	In Progress	51 actions agreed with CMT in February 2025 via detailed action plan.

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

Brent Adult Social Care has been inspected by the Care Quality Commission (CQC) to assess our delivery our Care Act duties including how we ensures safety within the system which includes: Safeguarding. The CQC report was published in August 2025 and noted a 'evidence shows a good standard'. The report noted 'Staff involved in safeguarding work were suitably skilled and supported to undertake safeguarding duties effectively. Safeguarding training was in place for staff, providers and partners. Senior leaders told us they recognised the importance of training all staff, identifying challenges and streamlining processes to enable a smoother transition between different stages of the safeguarding process and develop a culture of continuous improvement.'

The Brent Safeguarding Adults Board (BSAB) has also established a 'Performance and Audit' sub-group consistently of multi-agency partners. The agreed Terms of Reference for this group note 'The BSAB has delegated the responsibility to the Performance and Audit Subgroup to manage the work to monitor the effectiveness of safeguarding across the statutory partners and agencies working within Brent. The subgroup will provide assurance to the BSAB regarding overall effectiveness and highlight any areas for improvement.'

Following the Independent Review conducted in early 2024 by Dr Adi Cooper the service has been implementing agreed recommendations and actions identified within the review. To ensure these have been fully implemented Dr Adi Cooper is scheduled to come back in June 2025 to review progress. Safeguarding performance data for quarter 3 shows a significant improvement in the response time for dealing with safeguarding concerns raising from 42% dealt with within 2 days to 59% (against a target of 90%) and the number of safeguarding enquiries dealt with within 25days has risen from 20% in Q2 to 62% in Q3 (against a target of 80%).

Work continues to minimise risk, strengthen partnership working and information sharing, acknowledging that not all safeguarding incidents can be avoided.

Risk Scores	I	L	T	Trend
<i>Previous</i>	4	3	12	
CURRENT	4	2	8	
<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.
- The BSAB has set up a 'Performance and Audit Sub-group'

Action Plan – Safeguarding Incidents - Adults

Ref	Action	Target Date	Responsible Officer	Status	Comments
Follow-up of Previous Actions					
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	Completed	CQC rated safeguarding – evidence shows a good standard.
2.	We have commissioned a Safeguarding review across the service, feedback will form our Safeguarding improvement plan	January 2025	Director Adult Social Care	Completed	Implementation on track, due to complete May 2025.
3.	“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	Still in progress.
4.	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	ASC Restructure will be implemented March 2025 including new safeguarding structure and Mosaic processes/forms.
New/Proposed Actions					
1	Independent Review of progress by Dr Adi Cooper against her original review and recommendations	June 2025	Director of Adult Social Care	Not yet commenced	

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 33 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 are now meeting with residents in high-risk buildings on an annual basis to discuss the fire strategy for the building and any concerns they may have regarding building safety.

Preparation of the building safety cases in ongoing, Pennington Choices are leading on this on our behalf on an agreed programme of completions. The Building Safety Regulator has requested the submission of three building safety cases so far, Austen House, Dickens House and Windmill Court. All three were submitted on time, there were follow up requests for information regarding Austen House which has also been submitted.

Both Dickens House and Austen House are large panel system buildings due for demolition as part of the South Kilburn regeneration. We have been advised to undertake intrusive structural surveys for both blocks to confirm if they have been previously strengthened. All gas has been removed from the blocks to reduce the risk of explosion and subsequent collapse. The Regeneration team has been instructed to prioritise these blocks for decant.

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	Comments
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 2025	Head of Customer Services Housing	Completed	All of the Area Tenancy Managers have been recruited and they will now lead on keeping the vulnerability information updated in all high-risk blocks. This information is updated annually and when new residents move in.
2.	All compliance information is uploaded to True Compliance	January 2025	Building Manager	Completed	Action completed.
3.	Link True Compliance to Business Objects so reporting can be made easier	February 2025	Resident Data Team Manager	In Progress	The Resident Data Team are putting together a new dashboard through power BI. Expected to be complete end February 25.
4.	Provide building safety case reports for all high-risk buildings	August 2025	Building Manager	In Progress	There is a plan to get all BSC completed. We expect all to be completed by August 2025. This is the earliest possible date as most consultants are dealing with huge demand.
5.	Agree a joint strategy corporately for all new buildings to ensure Golden Thread/BIM information is available to HMS through one system	March 2025	Head of Capital Delivery	In Progress	There has been little progress on this. The Asset Management team are putting together a template of all the information required so this can be added directly into the Asset Management system.
6.	Northgate and True Compliance Integration	October 2025	Asset Manager/ Applications Support Lead	In Progress	Integration remains in progress.
7.	Re - measurement of 6 storey blocks	August 2024	Major Works and Refurbishments Manager	Completed	41 building reduced 33 following remeasure.
8.	Recruit to key posts in the Building Safety structure	October 2025	Head of Housing Property Services	In Progress	Strategic Compliance Manager recruited, however recruitment for Building Manager and Building Safety Case Manager were not successful.
9.	Prepare evacuation plans for High Rise Blocks	January 2025	Head of Housing Property Services	In Progress	Draft plans have been sent to the emergency planning team for comment.
New/Proposed Actions					
1.	Structural Survey on LPS blocks	May 2025	Major Works and Refurbishment Manager	In Progress	Surveys will be commissioned for Austen and Dickens in March 2025 if both blocks are still occupied.

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

The Council has commissioned an independent review of Procurement that includes a focus theme on contract management to provide additional assurance and improvement recommendations. This will report in March.

Contract management remains a decentralised function, with each service department responsible for managing their contracts, while Procurement provides guidance, oversight, training and strategic interventions. The Council has taken several steps to strengthen contract management and ensure compliance with best practices and legislative requirements, particularly in preparation for the Procurement Act 2023 going live in February 2025.

To improve governance and mitigate the risk of contract failure or underperformance, the Council has enhanced its contract management framework, oversight mechanisms, and compliance monitoring. These measures include the establishment of a Strategic Contracts Register, structured contract segmentation, and quarterly evidence gathering of KPIs to track contract outcomes effectively. Additionally, efforts have been made to integrate procurement planning into departmental service cycles, ensuring that contract expiry, renewal, or re-procurement decisions are made in a timely and informed manner.

Despite these improvements, key challenges and risks remain. Practices and compliance across services is inconsistent. Some departments may lack the necessary capacity or expertise to manage contracts effectively. As a result, there is a higher reliance on contract extensions and waivers, increasing the risk of non-compliance with procurement regulations. To address this, additional support structures have been introduced, including quarterly contract audits, centralised monitoring of strategic contracts, and targeted training sessions for contract managers.

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

- **Strategic Contracts Register & Enhanced Oversight** - A Strategic Contracts Register has been established to track high-value, high-risk contracts and ensure annual performance reviews. The Gateway 3 (mid-term) and Gateway 4 (contract expiry) processes are now embedded to ensure contract performance is monitored effectively and procurement opportunities are identified early. Procurement is attending quarterly Directorate Management Team (DMT) meetings to review contract management updates and address governance concerns.
- **Contract Segmentation for Risk-Based Oversight** - Contracts are now categorised as Major (Strategic) or Operational, enabling targeted management and oversight. High-value contracts (>£2m) require formal mid-term reviews presented to the Commissioning and Procurement Board (CPB). An MS Forms-based real-time update process is in place to maintain accuracy in the Contracts Register.
- **Quarterly data audits on Council Contracts Register**, will be introduced to verify contract information accuracy, particularly for high-risk and strategic contracts.
- **Readiness for the Procurement Act 2023** - A Procurement Implementation Working Group is preparing for increased transparency obligations under the new Act. Procurement has developed bitesize training sessions, integrated into the Procurement Learning & Development Portal, ensuring officers understand new contract monitoring requirements. A session was held with Council's SMG in February

Action Plan – Contract Management

Ref	Action	Target Date	Responsible Officer	Status	Comments
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 2024	Head of Procurement	Completed	Action completed.
2.	Ensure Procurement are prepared to implement the requirements of the new Procurement Act.	Feb 2025	Head of Procurement	In Progress	Significant progress has been made on track for go live.
3.	Undertake a second round of Gateway 4 reviews of contracts due to be procured.	Ongoing	Head of Procurement	In Progress	Gateways continue to be presented to CPB to review if efficiencies can be made for re- procurements or extensions coming up Mar 27.
4.	Undertake a session with the Commissioning Network relating to contract management requirements and good practice.	Ongoing	Head of Procurement	In Progress	Training for Contract Management requirements under the Procurement Act are being provided and further training on Contract Management will occur Q2 2025.
5.	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.	March 2025	Head of Procurement	In Progress	Bitesize training sessions have been developed and being delivered during Jan -Mar 25. This will then be added to the Procurement Training courses.
New / Proposed Actions					
1.	Commission independent review of Procurement and develop and deliver improvement plan to implement recommendations	April 2026	Director Strategic Commissioning & Capacity Building	In progress	Report expected March 25, with improvement recommendations and action plan to follow