FWH Risk Register

Strategic objective	Strategic Risk	Ref	Risk	Level of control	Recent developments	Pre-mitigation score: Likelihood	Pre-mitigation score: Impact	Pre-mitigation score: Score	Trend	Mitigating action	Owner (FWH)	Owner (SLA)	Timescale	Action status and update	Post-mitigation score: Likelihood	Post-mitigation score: Impact	Post-mitigation score: Score
Delivering safe and sustainable homes	FWH does not meet health & safety requirements - risk of injury or death to tenants, damage to property, financial and reputational damage	1	Issues with health & safety compliance certification and data lead to FWH being non-compliant with regulatory and statutory obligations	Significant control through SLA	True Compliance is fully set up and reporting is now led by Brent Housing; improved confidence in data and taking all necessary steps to address areas of non-compliance, now in a stable state	1	5	5		Fully implement True Compliance and integrate into scorecard	Strategic Support Officer	Head of Property Services	Completed	Some unavoidable risk remains (for example due to non-access into properties) but as of next review actions will be to continue: ongoing monitoring of H&S compliance via scorecards; following up identified actions; and presenting a quarterly report from the I4B/FWH team	2	5	10
		2	Third party freeholders do not provide compliance information to FWH for communal areas in third party blocks, meaning FWH cannot verify that adequate compliance controls in place	Reliant on third party freeholders	Engagement continues to be challenging in this area and this is expected to continue to be the case	2	5	10		Take forward strategy to delay payments for service charges etc. and engage with freeholders where information has not been provided	Strategy & Delivery Manager		Ongoing	Strategy to be taken forward, no significant outcomes to report	2	5	10
		3	FWH is non-compliant with requirements of building safety regulations	Significant control both directly and through SLA	FWH has two blocks (Addis and Arnoux Courts) requiring registration with and regular updates to the Regulator of Social Housing. Registration has been completed, all relevant information including Fire Risk Assessments is in place, and the latest quarterly survey to the Regulator was submitted in October 2024	1	5	5		Continue compliance with requirements of Building Safety Act and other relevant legislation	Strategy & Delivery Manager		Ongoing	Current main requirement is a quarterly survey to the Regulator of Social Housing, which is carried out within deadlines each quarter	1	5	5
Running a viable business	FWH does not manage its costs and performance well - risk of financial and reputational damage, or inability to trade as a going concern	4	Poor rent collection performance due to unaffordability of rent for tenants	Significant control through SLA	Rent collection performance remains challenging in this financial year, in part due to continued issues with benefit payments. A deep dive report on income will come to the December Board	4	4	16		Implement plans to improve rent collection rates	Strategic Support Officer	Head of Housing & Neighbourhoods	Mar-25	Detailed rent report presented to July Board showing improvements to weekly collection performance in comparison to last year, despite challenges with benefits this year; this will be supplemented by a further deep dive in December	3	3	9
		5	High void turnaround times, costs and rent loss lead to financial losses for FWH	Significant control through SLA	While turnaround times for some individual cases remain high, improvements in processes and collaboration are bringing down overall times, and a positive collaborative deep dive session held in September led to a number of improvement actions being agreed by the various teams working on voids; these will be tracked at fortnightly performance meetings and monthly service meetings. The outcome of the re-let voids pilot was also positive in terms of time and cost, and FWH are exploring a way to extend this way of working	4	3	12		Implement plans to reduce void turnaround times	Strategic Support Officer	Head of Property Services	Mar-25	A variety of projects and improvement actions remain underway for voids with reduced turnaround times and numbers of voids expected to be seen going forward	3	3	9
		6	High capital programme costs, including stock condition and energy efficiency expenditure, adversely affect the company business plan	Subject to market fluctuations, governmental requirements, availability of grant, etc.	Asset management and decarbonisation strategy in progress using stock condition and energy survey data. Strategic decisions to be taken on approach to planned / capital works	3	5	15		Develop asset management and decarbonisation strategy	Strategy & Delivery Manager / Senior Finance Analyst	Head of Property Services	Sep-24	Circa 75% of the stock has been surveyed, and costs have been inputted to the business plan. Strategy work will look at these costs over the life of the plan, account for missing data, and recommend strategic approach based on this. Strategy overdue but due to be presented at the December meeting	2	4	8
		7	Substantial variations in inflation and interest rates compared to the business plan adversely affect financial performance and viability	No control over external environment, can exercise caution through business planning	Low CPI levels for September 2024 will cap possible rent increases for 2025-26, and the impact on the FWH plan will be determined through the rent setting process	2	5	10		Regularly monitor economic environment and financial performance, including biannual stress testing of business plan	Senior Finance Analyst		Dec-24	Regular reviews are in place with next full business plan review due for December	2	5	10
		8	A cybersecurity incident results in in a loss of income, data and/or reputational damage to the company and the Council.	Reasonable internal control	New risk following Board feedback at July review. Directors asked to provide feedback	2	3	6		All staff and directors to follow guidelines on cybersecurity and GDPR	All		Ongoing	All staff carry out annual awareness courses, and regular improvements to Brent internal systems are made	2	3	6
		9	Fraud results in a loss of income and/or reputational damage to the company and the Council.	Significant internal control	New risk following Board feedback at July review. Directors asked to provide feedback	2	3	6		Carry out annual review of governance and internal control	Strategic Support Officer		May-25	Scheme of delegation approved by Board; annual review of governance standards, including National Housing Federation Code of Governance, takes place with the next review due in May 25	2	3	6
		10	Changing inflation or Government policy on rents and benefits means FWH cannot increase rents at business plan assumptions	None other than link to Council lobbying role, can exercise caution through business planning	determined later in year but no increases assumed for coming years in business plan; rent increase policy looks to remain the same under the current Government	2	3	6		Regularly monitor economic environment and Government policy, including biannual stress testing of business plan	Senior Finance Analyst		Dec-24	Next stress test to take place in December 2024	2	3	6
Providing a consistently good housing service	FWH's properties are not managed effectively - risk of tenant dissatisfaction, increase in complaints and reputational damage	11	FWH fails to meet the requirements of the Regulator's economic and consumer standards		Following the introduction of the new consumer standards, Regulatory inspections are beginning for local authorities and larger housing associations. The Council is undergoing a large-scale project in response to the consumer standards and the companies will form a part of this	3	3	9		Annual review of compliance with standards Carry out project alongside Brent Housing to meet requirements of new regulatory consumer standards	Strategic Support Officer Strategic Support Officer		May-25 Mar-25	Economic standards review completed in May 2024 and next review due in May 2025; consumer standards will also be included in this review but will be worked on outside of this process as below A Council Management Team-approved action plan was brought to the Board in September 2024 by the Quality Assurance & Standards Manager. Regular updates on this work programme, and the impact on FWH, will be presented back to the Board	2	3	6
		12	Poor service delivery gives rise to low tenant satisfaction	Significant control through SLA	FWH is required to meet all regulatory standards including the newly introduced consumer standards. Initial results suggest FWH and Brent more widely are below national and London standards, so a Council-wide piece of work will be underway over the coming months	3	3	9		Regularly measure tenant satisfaction against performance, and develop and implement targeted improvement plans	Strategic Support Officer	Head of Housing & Neighbourhoods	Mar-25	New regulation now in force and likely to be greater focus for company, and initial results suggest significant work to be done in improving satisfaction, in line with action plan referred to above	2	3	6
		13	Poor complaints management procedures lead to low tenant satisfaction	Significant control through SLA	Also part of consumer standards, and separate complaints hierarchies have been set up on the system for the housing companies, with the first report to come to the October Board meeting	3	3	9		Regularly measure complaints performance and tenant satisfaction, and develop and implement targeted improvement plans	Strategic Support Officer	Head of Housing & Neighbourhoods	Mar-25	Complaints reporting to be introduced from October 2024	2	3	6
		14	Disrepair in properties leads to poor tenant satisfaction, reputational damage and an increase in costs through legal settlements.	Reasonable control through SLA	Over the past 1-2 years a notable increase in disrepair cases has been seen. The amount of new cases coming through has settled, but instances of tenants being advised to not allow access for works and more general works and settlement costs create an ongoing risk for FWH. There is a clear legal framework for the management of disrepair cases	3	3	9		Closely monitor, manage and report on disrepair cases	Strategic Support Officer		Ongoing	Monthly report has now been set up by Legal providing operational and financial updates on all FWH disrepair cases, which will be fed into performance reports and financial reports	2	3	6