



# Strategic Risk Report

September 2025

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

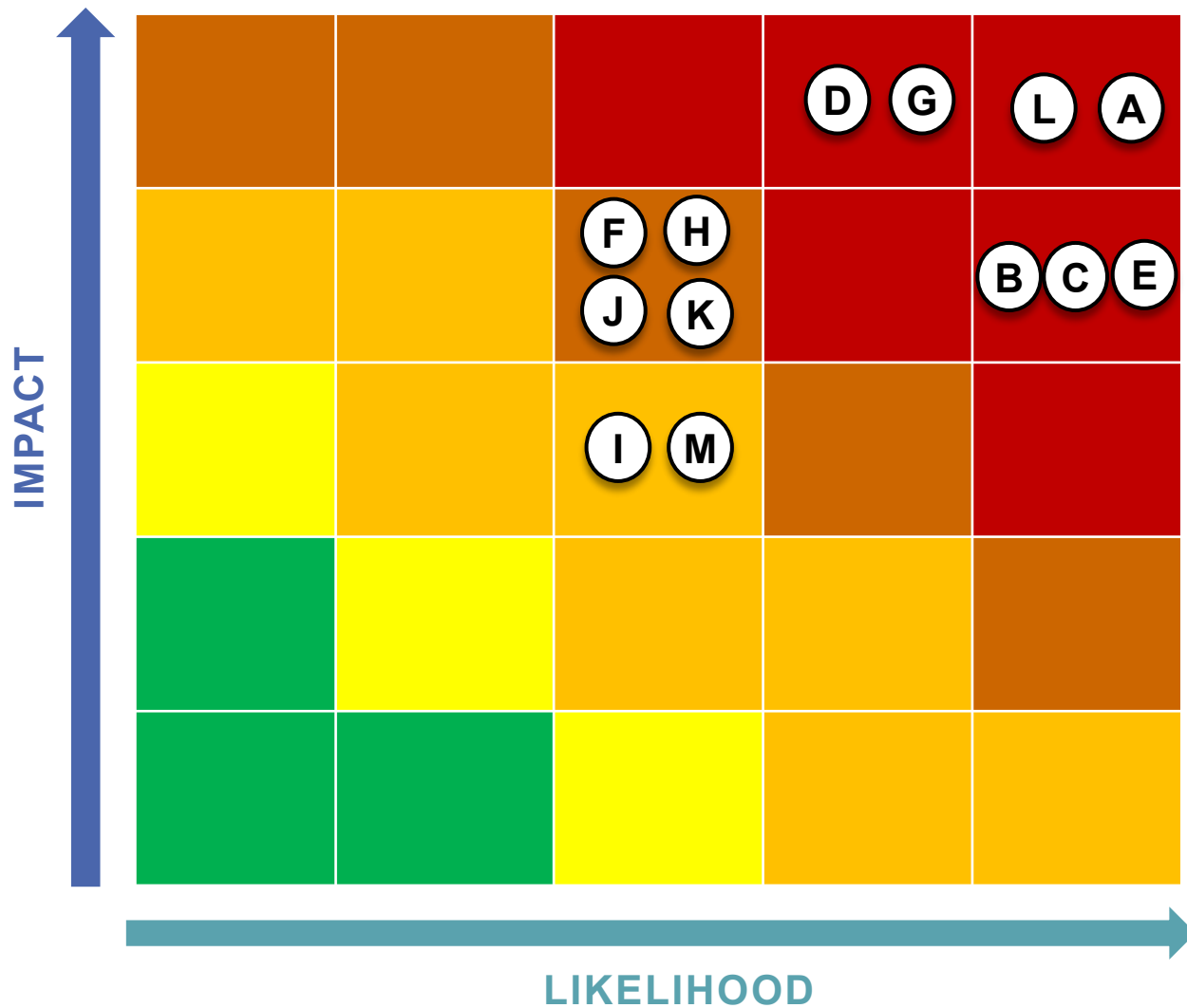
IMPACT

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

1	2	3	4	5
Rare	Unlikely	Possible	Likely	Very Likely
Highly unlikely, but it may occur in exceptional circumstances.	Not expected, but there's a small possibility it may occur at some point.	This event might occur at some point and/or there is a history of occurrence of this risk at this, or other, Councils	There is a strong possibility this event will occur.	This event is expected to occur in most circumstances.

LIKELIHOOD

# Strategic Risk Heat Map



Ref	Risk
A.	Lack of Affordable Accommodation
B.	Cost of Living Crisis
C.	Increase in DSG High Needs Block Deficit
D.	Risks to Community Cohesion
E.	Climate & Ecological Emergency
F.	Cyber Attacks
G.	Financial Resilience & Sustainability
H.	Risk of a serious child protection incident or wider safeguarding concerns
I.	Recruitment and Retention
J.	Emergency Preparedness
K.	Risk of a serious incident or wider safeguarding concern involving a vulnerable adult
L.	Non-compliance with Statutory Housing Duties
M.	Contract Management

# Risk Overview

Ref	Risk Title	SRO	Risk Score	Previous	Trend	Target Score	Gap to target score
A.	Lack of Affordable Accommodation	Director Housing Needs & Support	<b>25</b> (I:5 L:5)	<b>25</b> (I:5 L:5)	↔	<b>10</b> (I:5 L:2)	+15
B.	Cost of Living Crisis	Head of Resident Experience	<b>20</b> (I:4 L:5)	<b>20</b> (I:4 L:5)	↔	<b>15</b> (I:3 L:5)	+5
C.	Increase in Dedicated Schools Grant High Needs Block Deficit	Director Education Partnerships & Strategy	<b>20</b> (I:4 L:5)	<b>20</b> (I:4 L:5)	↔	<b>16</b> (I:4 L:4)	+4
D.	Risks to Community Cohesion	Director Community Development	<b>20</b> (I:5 L:4)	<b>20</b> (I:5 L:4)	↔	<b>15</b> (I:5 L:3)	+5
E.	Climate & Ecological Emergency Mitigation, Adaptation and Resilience	Head of Environment Strategy & Climate Action	<b>20</b> (I:4 L:5)	<b>20</b> (I:4 L:5)	↔	<b>20</b> (I:4 L:5)	=
F.	Cyber Attacks	Managing Director, Shared Technology Service	<b>12</b> (I:4:L3)	<b>12</b> (I:4 L:3)	↔	<b>9</b> (I:3 L:3)	+3
G.	Financial Resilience and Sustainability	Deputy Director of Finance, Corporate and Financial Planning	<b>20</b> (I:5 L:4)	<b>20</b> (I:5 L:4)	↔	<b>10</b> (I:5 L:2)	+10
H.	Risk of a serious child protection incident or wider safeguarding concerns	Director Early Help and Social Care	<b>12</b> (I:4:L3)	<b>12</b> (I:4 L:3)	↔	<b>8</b> (I:4 L:2)	+4
I.	Recruitment and Retention	Director Human Resources & Organisational Development	<b>9</b> (I:3:L3)	<b>9</b> (I:3 L:3)	↔	<b>6</b> (I:3:L2)	+3
J.	Emergency Preparedness, Response & Recovery	Deputy Head of Resilience	<b>12</b> (I:4:L3)	<b>12</b> (I:4 L:3)	↔	<b>9</b> (I:3 L:3)	+3
K.	Risk of a serious incident or wider safeguarding concern involving a vulnerable adult	Director Adult Social Services	<b>12</b> (I:4 L:3)	<b>8</b> (I:4 L:2)	↑	<b>8</b> (I:4 L:2)	+4
L.	Non-compliance with Statutory Housing Duties	Director Housing Services	<b>25</b> (I:5 L:5)	<b>10</b> (I:5 L:2)	↑	<b>6</b> (I:3:L2)	+19
M.	Contract Management	Director of Strategic Commissioning, Capacity Building & Engagement	<b>9</b> (I:3:L3)	<b>9</b> (I:3 L:3)	↔	<b>6</b> (I:3:L2)	+3

# A. Lack of Supply of Affordable Accommodation

## Risk Details

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.

## Risk Update


The total demand from homeless households for Q1 of 2025/26 was 1,806, broken down between 1,276 single people and 530 families. This equates to an average of 139 applications per week. If demand remains at the same level the total number of approaches for 2025/26 will be 7,224. This level of demand would be a 10% increase on the 2024/25 total number of applications, which was 6,545

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.. 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 has undergone its Third Reading in the House of Lords, pending Royal Assent and commencement, when the main provisions of the Act take effect. This is when Section 21 will be abolished, ending "no-fault" evictions. However, there is no set timescale for this – commencement may be immediate, or it could be months after Royal Assent. The abolition of Section 21 will mean 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 decrease following the commencement of the Act

The Preventing Homelessness Work Programme has implemented an action plan that is monitored by the SRO Delivery Board.

## Risk Scores

	I	L	T	Trend
<b>CURRENT</b>	<b>5</b>	<b>5</b>	<b>25</b>	
Previous	5	5	25	
Target	5	2	10	

## Key Controls & Mitigating Actions

- Preventing Homelessness Work Programme commenced to improve the service, promote a council-wide approach to the prevention of homelessness and reduce the cost of TA
- Promotion of the Find a Place you can afford scheme to encourage homeless households to source their own affordable accommodation in the PRS
- Continued use of grant money from the Council Homes Acquisition Programme (CHAP) the Local Authority Housing Fund (LAHF) to increase the supply of affordable accommodation
- Use of PRS accommodation.
- I4B acquisitions programme to increase supply of affordable PRS accommodation.
- Two purpose built emergency TA schemes delivered, and a third being developed.

# A. Lack of Supply of Affordable Accommodation

## ◆ Action Plan

Ref	Action	Target Date	Status	Comments
<b>Follow-up of Previous Actions – March 2025</b>				
1.	To continue delivering the New Council Homes Programme (NCHP) to increase supply of affordable homes.	March 2026	In progress	It is anticipated that 820 new-build affordable homes will be delivered in 25/26. As at 31 July 300 homes have been delivered, and we are anticipating the completion of a further 520 affordable homes before the end of March 2026. 574 (70% ) of these homes will be allocated to homeless households to help alleviate the pressure on Temporary Accommodation
2.	To continue to acquire street properties through i4B.	March 2026	In progress	The i4B acquisition target for 2025/26, is 15 properties. As at 31 July there are 8 properties in conveyancing, 2 at valuation stage and a further 4 in negotiations. It is therefore anticipated that the target will be met by end of March 2026.
3.	To ensure completion of a new temporary accommodation scheme that would provide an additional 130 units of temporary accommodation.	May 2029	In progress	<p>Cabinet approval to proceed with the scheme in July 2025. Next steps are to procure new consultants, prepare the tender pack and procure a new contractor. The contractor will then complete the design, submit the BSA gateway 2 application and build out the scheme. Please find indicative dates below:</p> <p>Consultant procurement: Sept – Nov 25  Tender Pack drafting: Dec – Feb 26  Contractor Procurement: March – May 26  RIBA 4 design: June – December 26  Gateway 2 application: Jan 27 – Apr 27  Build: May 27 – Apr 29</p>
<b>New Actions – September 2025</b>				
4.	Increase supply through the Council Homes Acquisition Programme (CHAP) programme in 25/26	March 2026	In progress	15 properties are being acquired under the Council Homes Acquisition Programme (CHAP) programme in 25/26 A Cabinet paper is scheduled for September 2025 and subject to approval, CHAP acquisitions. will commence
5.	Increase supply through the Local Authority Housing Fund (LAHF) programme in 25/26	March 2026	In progress	17 properties are being acquired under the Local Authority Housing Fund (LAHF) programme. Under the LAHF, the Council are required to purchase 42 properties in total by the end of March 2026. 19 properties have completed acquisition to date with a further 16 in conveyancing. Officers are currently reviewing market opportunities to meet the total LAHF target.
6.	Preventing Homelessness Work Programme	March 2026	In progress	<p>A comprehensive discovery process has been completed, and a detailed work programme implemented with OKR's monitored by the SRO Delivery Board. The Work Programme focuses on;</p> <ul style="list-style-type: none"> <li>• Improving the Housing Needs &amp; Support Department</li> <li>• Preventing homelessness</li> <li>• Reducing the cost of temporary accommodation</li> </ul>

# B. Cost of Living Crisis

## Risk Details

The cost-of-living crisis caused by rising inflation and low wage growth continues to impact Brent’s residents. This was further exacerbated by the 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.

## Risk Update

The ongoing cost-of-living crisis continues to have pressure on Brent residents 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; 5,948 homelessness applications were received in 2021/2022, up to 7,300 in 2023/2024 and 6,281 in 24/25. 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, the Council has implemented the new 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 17th August 2025, the Resident Support Fund has supported 6,245 applicants with £5,412,194.55. Support has been provided for household bills, Council Tax, food, fuel, digital equipment, and emergency funds. A further 932 customers have been supported through digital support.

The new Council Tax Support (CTS) scheme was implemented on 1 April 2025, alongside the Council Tax hardship fund. Information on both schemes is available on the redesigned webpage.

The hardship scheme for working-age residents includes the following main elements: the direct hardship relief (13A) policy, targeted communications, staff and partner briefings, self-service online support, face-to-face and telephone assistance, and an enhanced recovery process. Since implementation, we have received 1,137 Council Tax hardship applications. Of these, 1,025 were rejected and 103 were awarded. The average processing time from receipt to decision is 7.3 days. The total value of awards is £21,027.64, with an average award amount of £225.

Risk Scores	I	L	T	Trend
CURRENT	4	5	20	
Previous	4	5	20	
Target	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, 652 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 (CWS), Debt Advice Service and Immigration Advice Service. In the first 6 months, the CWS supported 139 member families and facilitated over 3,000 community kitchen visits, over 1,000 café visits and nearly 1,000 community shop visits.
- Cabinet considered a revised 13A policy at its meeting on 10 March 2025. The approved policy provides access to a £1.5m fund to support further reductions in Council Tax for those experiencing particular hardship.

## B. Cost of Living Crisis

### ◆ Action Plan

Ref	Action	Target Date		Status	Comments
Follow-up of Previous Actions – March 2025					
1.	To develop and embed employment and skills initiatives as part of the Resident Support Model	March 2025	Complete	The Employment and Skills OBR and testing of the pilot informed an improved employment offer at the expanded Community Wellbeing Service, including extending the membership length from 3 months to 6 months to improve work readiness. In the first 6 months, the Community Wellbeing Service has enrolled 139 members on a longer 6-month membership.	
2.	To consider and agree how to best utilise any extension of the Government’s Household Support Fund for 25/26.	March 2025	Complete	The funding allocation for the Household Support Fund (HSF) for the new financial year is <b>£4.9 million</b> . The Council Tax Hardship (13A) Fund is <b>£1.5 million</b> . Expenditure from both funds is restricted to the amounts provided by the government, with the HSF allocation intended to help mitigate the most significant impacts of the new Council Tax Support (CTS) scheme.	
3.	To monitor and review impacts of the new model of resident support.	December 2024 onwards	In Progress	The model was approved by Cabinet in February 2024. Quarterly monitoring is in place, and an annual report on the impact of the Resident Support Fund (RSF) will be completed and submitted to the DWP. Monitoring is carried out through the required returns to the DWP on the Household Support Fund, which provide a detailed breakdown of the categories and households supported. In addition, monitoring also covers delivery partners, including the Community Wellbeing Service, Debt Advice, and Immigration support services, to ensure the fund is reaching those most in need.	
4.	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 2025	In Progress	The framework was approved for testing with the letting of 3 premises. The Council is currently in lease negotiations for the letting of 2 of the premises (pending completion of fit-out works). The former Melting Pot café in the Civic Centre has been let to London's Community Kitchen under the new framework and will provide a café to staff as well as hospitality training and qualification opportunities for local residents, due to open in September 2025.	
New Actions – September 2025					
5.	Launch of Debt Advice Partnership	Summer 2025	Ongoing	The Debt Advice Partnership with Citizens Advice Bureau offers a safe space for residents to help with finances. Since the beginning of the partnership, 432 residents have received support, £218,648 secured in additional income, £212,069 of debt written off or reduced and £271,245 of debt is now being actively managed. More info: <a href="https://www.citizensadvicebrent.org.uk/our-partners/">https://www.citizensadvicebrent.org.uk/our-partners/</a>	



# C. Increase in Dedicated Schools Grant High Needs Block Deficit

## Risk Details

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.

## Risk Update

The DSG has carried a deficit balance since 2019/20 and the cumulative balance carried forward from 2024/25 was £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. In addition, 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 are being developed that will contribute to the efficient use of the High Needs Block to support children's and young people's needs.

As a result of these initiatives, the cost avoided equated to £2m in 2023/24 and £2.5m for 2024/25. The actions in the Management Plan and the 0.5% block transfer reduced the HNB in-year deficit from a potential £2.9m deficit to a £0.4m deficit in 2024/25. A key issue is that HNB funding increases (6% in 2025/26 and 3% thereafter) are not in line with increasing demand for EHCPs and access to SEND services.

The assumptions in the Management Plan assume a slowdown in the annual growth of EHCPs to 7% from 25/6 in response to the range of targeted actions as described above. The forecast reduction in spend based on the mitigating 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, the current budget forecast for 25/6 is indicating pressures of circa £3m. This reflects the increasingly complex needs of young children and continuing demand for EHCPs. A key pressure is the need for more children to be placed in independent maintained special schools due to the lack of local mainstream special school places.

There is limited opportunity to recover the historical deficit, due to systemic issues related to the national implementation of the Children and Family Act in 2015 that affect most local authorities in England. The regulations that are in place to carry forward a deficit balance against the DSG were due to end in 2022/23. However, this statutory override has recently been further extended to April 2028. A range of agencies within the sector have raised concerns with the government about the sustainability of the current national SEND system. National reforms are anticipated with a SEND White Paper due in October 2025. However, implementation of any changes is unlikely before 2028 and it is not yet known how reforms might impact on Brent.

Risk Scores	I	L	T	Trend
CURRENT	4	5	20	
Previous	4	5	20	
Target	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, with a focus on creating additional local special school places at pace.
- Embedding new system changes building on pilot projects from Brent's participation in the government Delivering Better Value (DBV) programme to support inclusion in mainstream schools.

## C. Increase in Dedicated Schools Grant High Needs Block

### ◆ Action Plan

Ref	Action	Target Date	Status	Comments
<b>Follow-up of Previous Actions – March 2025</b>				
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	In progress	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 the primary school estate, including new Special School satellite provision.
2..	Redesign of the SEND Support service with the expectation to manage demand and increase inclusive practice in mainstream settings as part of the Graduated Response Programme and person-centred planning. The aim is for children and young people to 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.	April 2026	In progress	This is ongoing. SEN support activity is embedded into ways of working with schools and is being developed with headteacher input to support inclusion in mainstream schools.
3.	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 2026	In progress	A banding review of top-up funding in mainstream schools, post-16, ARPs and Early Years has been completed. A banding review of rates for special schools is underway. The Inclusion Service is working with headteachers to develop new approaches building on DBV pilots to be implemented from September 2025 onwards to support inclusion in mainstream schools.
4.	Continued Central Government lobbying for appropriate funding	April 2026	In progress	Action remains in progress. An appropriate response will be provided to consultation on the SEND White Paper anticipated in October 2025.
<b>New Actions – September 2025</b>				
None proposed.				

# D. Risks to Community Cohesion

## Risk Details

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.

## Risk Update

Brent had a higher rate of population growth than the London and England average between 2011 and 2021. Certain categories of ethnicity saw significant increases in population (e.g. Arab +57% and ‘Any other ethnic group’ +145%). The three largest ethnic groups are Indian (19.5%), Other White (15.9%), and White British (15.2%).

The rich diversity of the population brings opportunities for cohesion and unity, but it is not immune to the risks of community tension and conflict. Global events can have a local impact, creating tensions amongst communities that would otherwise coexist peacefully. The Council is mindful of tensions escalating and the possibility of resulting disorder. Unchecked tensions can result in a breakdown in community cohesion, creating an environment where extremism could thrive. The Ministry of Housing, Communities and Local Government (MHCLG) has also undertaken an assessment and has identified Brent as a priority borough to receive community cohesion funding.

The continuing Israel-Gaza conflict has contributed to a rise in hate crimes, particularly anti-Semitism and Islamophobia, reflecting heightened tensions within local communities. The proscription of Palestine Action in 2025 has further polarised community sentiment, with ongoing protests across London resulting in a number of arrests under terrorism legislation. Additional tensions have been observed during and following international conflicts such as those between Israel and Iran, and India and Pakistan, which have influenced Brent’s local communities.

Anti-migrant sentiment continues to fuel divisions and hostile rhetoric. Media coverage has at times exacerbated these tensions, including reports suggesting that migrant hotel residents are accessing NHS services at the expense of local residents. Since the disorder in Southport and other areas in summer 2024, Brent communities have expressed ongoing concerns about being targeted, particularly in the context of summer 2025 anti-migrant protests in Essex and other parts of London.

The UK national threat level for Terrorism remains ‘substantial’ and Brent experiences complex risks and challenges, including persistent threats from extremist groups. Brent has received targeted Home Office funding to respond to the risks of radicalisation.

Risk Scores	I	L	T	Trend
CURRENT	5	4	20	
Previous	5	4	20	
Target	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, schools and settings.
- Continuously assess the impact of current initiatives and remain flexible to adapt strategies based on real-time community feedback and emerging challenges.

## D. Risks to Community Cohesion

### ◆ Action Plan

Ref	Action	Target Date	Status	Comments
<b>Follow-up of Previous Actions – March 2025</b>				
1.	Strengthen multi faith forum and other community networks to effectively respond to community tensions and build community resilience by providing tactical, coordination and funding support.	March 2026	In progress	<p>Community tensions are regularly discussed across key forums; including the Pensioners Forum, Disability Forum, Brent Multi-Faith Forum, and the Borough of Sanctuary. In partnership with the police, tailored measures are implemented to respond to emerging concerns and maintain community cohesion.</p> <p>To support this work, £10,000 has been allocated to provide secretariat support for the forums, ensuring alignment with borough priorities. Delivery is scheduled to commence shortly.</p> <p>Over the past six months, ten Brent Connects meetings have been held, providing a platform for council services to engage with residents and reassure them about ongoing preventive measures. In addition, two Brent Multi-Faith Forums and two Police Hate Crime meetings focused specifically on addressing community tensions and promoting cohesion. Another Faith Links event was held in Stonebridge in July 2025.</p>
2.	Deliver Community Cohesion and Hate crime projects by March 2026. These projects are: <ol style="list-style-type: none"> <li>1. Community Cultural Celebration Days</li> <li>2. Hate Crime Schools Programme and 24/7 Third-party reporting line</li> <li>3. Hate Crime Community Capacity Building Project</li> </ol>	March 2026	In progress	<p>Two Cultural Celebration Days were held on 11 May and 15 June 2025, engaging over 1,000 participants. These events aimed to strengthen community relationships and counter harmful narratives that divide communities.</p> <p>The summer edition of Brent Magazine featured Stop Hate UK's third-party reporting line, which has been available to Brent residents since April 2025. Meanwhile, both the Hate Crime Community Capacity Building Project and the Schools Project continue to deliver training and engage Brent's diverse communities, building resilience against hate.</p> <p>Interim evaluation findings show large increase in attendees' confidence to support their communities and a greater willingness to report hate crime. To date, the projects have trained more than 500 young people.</p>
<b>New Actions – September 2025</b>				
None proposed.				

# E. Climate & Ecological Emergency Mitigation, Adaptation & Resilience

## Risk Details

There is a significant risk that carbon neutrality as a borough will not be achieved by either 2030 or 2050 and 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. This is due to a lack of funding, resources, and the level of widespread behaviour change required to meet the scale of the challenge. Failure to mitigate emissions and invest in adaptation and resilience measures 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 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.

## Risk Update

The council declared a climate and ecological emergency in 2019 and pledged to do all reasonable in its gift to aim for carbon neutrality by 2030 and work with government to achieve the national 2050 target. A study in 2019 estimated that the cumulative capital investment required for Brent to deliver all possible carbon reduction measures would cost £3.1bn. In 2023 (the most recent available statistics), 809 kilotons of carbon dioxide were emitted within the Brent boundary (38% from homes; 28% from transport; 17% from the commercial sector, 8% from public sector and 8% from Industry). Indirect consumption emissions (from the consumption habits of Brent's residents) are estimated to be 3-5 times higher than this. Brent's in boundary carbon emissions have reduced by 47% since 2005, but 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.

Climate change mitigation, adaptation and resilience must go hand in hand in order to tackle the climate emergency. A joined-up approach that both reduces emissions and strengthens our ability to cope with a changing climate is essential for a sustainable future. Brent first published its Climate Adaptation and Resilience Plan (CARP) in June 2022 and an updated version is being published in September 2025. The CARP sets out how Brent will prepare for the impacts of climate change, focusing on three main risks – flooding, extreme heat, and drought and water shortages. Our dense population, urban built environment and lack of green space puts it at increased exposure to surface water flooding, extreme heat and drought. The impacts of climate change are already being felt locally. The past ten years (2015-2024) were the warmest on record. In 2022, temperatures in London exceeded 40°C for the first time, with the Church End & Roundwood area identified as one of Britain's hottest neighbourhoods. In July 2021 there was significant flooding affecting homes, infrastructure, and businesses in Brent.

The council will need to both prepare for these risks and reactively deal with emergencies caused by extreme weather. The key risk is 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 deal with adverse climate impacts.

Risk Scores	I	L	T	Trend
CURRENT	4	5	20	
Previous	4	5	20	
Target	4	5	20	

## Key Controls & Mitigating Actions

- The council's climate programme is overseen by a Corporate Sustainability Board, chaired by the Director of Inclusive Regeneration & Climate Action.
- A new climate programme for 2024-26 was adopted by Cabinet in October 2024.
- Our annually update Climate dashboard 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 Climate Team carries out horizon scanning for any new sources of funding that can support the Climate Programme and has secured £14.2m to date.
- The council's existing Climate Adaptation and Resilience Plan has been reviewed and updated and will be published in September 2025 with a first year action plan including the development of a climate resilient pilot in Harlesden.
- 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.

# E. Climate & Ecological Emergency Mitigation, Adaptation & Resilience

## ◆ Action Plan

Ref	Action	Target Date	Status	Comments
Follow-up of Previous Actions – March 2025				
1.	To implement the 2024-2026 Climate Programme	October 2024	In progress	Action in progress.
2.	To review and benchmark Brent's carbon emissions from the 2023 DESNZ statistics when these are released in summer 2025.	August 2025	In progress	Action in progress.
New Actions – September 2025				
None proposed.				

# F. Cyber Attacks

## Risk Details

There is a continued 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.

## 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
CURRENT	4	3	12	
Previous	4	3	12	
Target	3	3	9	

## 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.
- One 'Table-Top' cyber-attack exercise was held with the EP team and 'Silver' staff members. Mini exercises have been taking place with business services and emergency planning teams with the focus on business continuity plans, to practice our coordinated response to any attack. Two more exercises are planned to include a tri-borough exercise in Oct 2025.



## F. Cyber Attacks

### ◆ Action Plan

Ref	Action	Target Date	Status	Comments
<b>Follow-up of Previous Actions – March 2025</b>				
1.	Enhanced training for IT staff within STS and Brent IT teams on cyber, security and technology.	December 2025	In progress	A product called Mycompliance has now been introduced, giving staff access to Information Governance Training initially, with more specific Cyber Security training available. We will shortly be piloting this within the STS teams.
2.	Carry out independent peer reviews of Tier 1 systems.	December 2025	In progress	On an annual basis, one of our Tier 1 systems is selected for Internal Audit, on the processes and controls in place.
3.	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.	Annually	In progress	Our 3 <sup>rd</sup> Party Supplier Cyber assessment framework is now in place, augmented by monthly scanning of all STS suppliers via LOTI. As of August 2025, 86% of STS suppliers are graded A-C by LOTI.
<b>New Actions – September 2025</b>				
None proposed.				



# H. Financial Resilience and Sustainability

## Risk Details

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.

## Risk Update

Between 2010 and 2025, Brent has delivered total cumulative savings of £218m. In February 2025, Council agreed the budget for 2025/26, based on a package of agreed savings, including amending the Council's Council Tax Support Scheme to require a greater contribution from all residents. This package of savings takes the total savings since 2010 to £238m (55% of the net revenue budget for 2025/26).

Alongside developing the budget, the MTFS was extended to cover the three year period from 2026/27 to 2028/29. This is expected to cover a three-year local government finance settlement from 2026/27, due in the autumn. As a result of ongoing pressures, particularly on homelessness and temporary accommodation, a further budget gap across the three years of £30m was identified.

This budget gap exists amid significant uncertainty in local government finances, as a result of the ongoing Fair Funding Review, which the Government have recently consulted on. The reforms will result in Government grant funding being redistributed based on an updated assessment of relative need and the first reset of the Business Rates Retention System since 2013. The Council is utilising modelling from multiple sources to forecast the impacts of the reforms on the MTFS, but certainty will not be forthcoming until the Provisional Local Government Finance Settlement (usually published in December). As in previous years, Brent Council will need to prepare a draft budget for Cabinet in November 2025, before the full impact of the reforms is known.

These fundamental reforms will provide greater medium-term certainty for the MTFS, but there is a particular risk that the 2026/27 budget setting process will not fully account for the impact of the reforms. Furthermore, early modelling of the impacts based on the consultation suggest that Brent Council will see some loss of funding (with a range of possible outcomes) at the same time that meeting the existing budget gap, while continuing to deliver high quality services, is becoming increasingly challenging.

Risk Scores	I	L	T	Trend
CURRENT	5	4	20	
Previous	5	4	20	
Target	5	2	10	

## 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.
- Expenditure controls imposed across the Council.

## H. Financial Resilience and Sustainability

### ◆ Action Plan

Ref	Action	Target Date	Status	Comments
<b>Follow-up of Previous Actions – March 2025</b>				
1.	To continue the ongoing robust budget monitoring regime and framework.	Ongoing	In progress	Monthly budget monitoring has been carried out throughout the year and reported to Cabinet in July, with further updates due in October and February
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	In progress	Regular updates provided by services to Budget Assurance Panel throughout the year to date, with updates to continue through the remainder of the financial 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	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	Completed	£8m of in-year savings have been identified and were delivered by services in 2024/25
5.	Monthly CMT monitoring of progress with in-year savings	March 2025	Completed	CMT received monthly updates on the progress of the in-year savings
6.	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	In progress	A comprehensive response to the Government's Fair Funding Review consultation was submitted in August. A response is expected from the Government in the autumn, followed by a policy statement and the provisional settlement. This will be reviewed closely to assess the impact of the final proposals on the budget. Modelling has been undertaken using multiple sources and will continue to be developed between now and the draft budget in November.
<b>New Actions – September 2025</b>				
None proposed.				

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

## Risk Details

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

## Risk Update

The Council's most recent (October 2024) 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 continues for an expected Focused Visit this calendar year by Ofsted. The next self-evaluation of practice will be completed in 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. A re-design of Early Help and Children's Social Care that aligns with the DfE Families First Programme has been implemented and a phase 2 delivery plan has been approved. 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 the growing stability of the agency workforce. 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. 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
CURRENT	4	3	12	
Previous	4	3	12	
Target	4	2	8	

## Key Controls & Mitigating Actions

- Quarterly quality assurance reports about practice and learning. Monthly performance reporting to senior leaders.
- 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.

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

### ◆ Action Plan

Ref	Action	Target Date	Status	Comments
<b>Follow-up of Previous Actions – March 2025</b>				
1.	Complete re-design programme in early help and social care and implement new model in line with set budget.	April 2025	Completed	New model implemented on 2 June 2025. Savings achieved
2.	Ensure Working Together 2023 partnership arrangements fully implemented	December 2025	Completed	Revised governance partnership arrangements agreed. Education representative identified as the fourth statutory partner
3.	DfE Family First Partnership Programme implementation in Brent CYP	April 2026	In progress	Delivery plan submitted to DfE. Stakeholder forum in place and terms of reference agreed
4.	Implementation of the quality assurance programme and learning events	April 2026	In progress	Quarterly reports to OCSLT
5.	Continue targeted recruitment campaigns and continued focus on agency to permanent recruitment.	April 2026	In progress	34% reduction in agency staff spend from 23-4 to 24-5
6.	Continue learning on complex and high profile cases within service areas and within the existing safeguarding partnership structures.	April 2026	In progress	EVVP panel in place. Regular 'need to know' briefings highlight high risk cases to senior leaders
7.	Continued to ensure budget savings and targets are met and monitored monthly.	April 2026	In progress	On track
<b>New Actions – September 2025</b>				
8.	Revised panel arrangements to track cases and ensure senior leader oversight	April 2026	In progress	

# I. Recruitment and Retention

## Risk Details

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

## Risk Update

HR&OD launched a new People Strategy in June 2025, which outlines the council's commitments over the next three years. This strategy, supported by an action plan, includes objectives to improve recruitment, retention and the council's employer brand.


The first phase of the Council's external career pages refresh has been completed, with a redesign aimed at enhancing visual appeal and functionality; the primary goal is to improve accessibility and the overall user experience. Phase two will focus on further improving the applicant journey by introducing new support tools and guidance. Additionally, the increase in roles advertised via LinkedIn has already shown positive results in expanding candidate reach and engagement. Furthermore, the Council has gained visibility by regularly featuring career opportunities in Your Brent magazine and by participating in the recent Wembley Stadium Jobs Fair.

An external audit completed in July 2025 resulted in the Council receiving an 'moderate' assurance rating, with five management actions identified for improvement. In response, HR&OD has committed to reviewing existing recruitment policies, with a relaunch planned for March 2026. This will be complemented by the design and launch of new in-house recruitment training for hiring managers, which is expected to support better recruitment outcomes and ensure consistency across departments.

Regarding expenditure, the Council has successfully reduced agency worker spending in 2024/25, with £22.9m spent through the MSP contract with Comensura, marking a 26% reduction compared to the previous year (£7.9m). In July 2025, Cabinet approved a new hybrid MSP contract, which is expected to further reduce agency worker usage and expenditure while maintaining cost-effectiveness. Mobilisation of the new contract is scheduled to begin early September 2025, with system integrations and the transition of existing workers to be completed by February 2026.

HR&OD continues to promote the new in-house Resourcing Business Partner service, which provides essential support for permanent recruitment, particularly for hard-to-fill roles. This service has received excellent feedback from both candidates and hiring managers. The Resourcing Business Partners continue to build relationships with hiring managers, offering tailored services ranging from last-minute candidate searches to full-service recruitment support akin to external recruitment agency. Since Risk Register update in February, recent resourcing strategies have addressed challenges in recruiting for Senior HR Business Partner, Residential Lawyer, Principal Heritage Officer, Principal Social Worker and several positions within the Housing Needs team.

## Risk Scores

	I	L	T	Trend
<b>CURRENT</b>	<b>3</b>	<b>3</b>	<b>9</b>	
Previous	3	3	9	
Target	3	2	6	

## Key Controls & 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 '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
- Managed Service Provider contract in place 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.

# I. Recruitment and Retention

## ◆ Action Plan

Ref	Action	Target Date	Status	Comments
<b>Follow-up of Previous Actions – March 2025</b>				
1.	Working with job board providers to maximise the functionality on offer to increase the profile of jobs at Brent	Ongoing	In Progress	
2.	Work with Directors to review their agency spend and how to use targeted campaigns to reduce reliance on agency spend. Work with hiring managers to design resourcing strategies to overcome current challenges recruiting to specialist and hard to fill roles	Ongoing	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	In Progress	
4.	To support reduction of agency worker expenditure, focus on use of high-cost interim agency workers and the promotion Comensura to reduce costly direct sourcing. Review controls in respect of agency staff pay rates.	Ongoing	In Progress	
5.	Produce reports to review metrics and to assess effectiveness of campaigns where social media is being optimised	Ongoing	In Progress	
6.	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	Not Yet Commenced	
7.	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	Completed	
8.	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	Completed	
<b>New Actions – September 2025</b>				
None proposed.				

# J. Emergency Preparedness, Response and Recovery

## Risk Details

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.

## 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 over the last year, we have seen progress in this area, supported by the current review of the standby payments which will provide further clarity on how volunteers are recompensed for their support.

Changes in senior management staffing in coming months, means additional Gold training will be delivered by the end of the year, to maintain the levels. Also consideration is being given to the HALO role in terms of increasing the number of those trained, to ensure there is someone available 24/7 as per the Grenfell recommendations. Good progress has been made on the number of officers trained as Emergency Centre Officers/ Managers, Local Authority Liaison Officers and Loggists, these now need to be maintained.

The new legislation, also referred to as "Martyn's Law," will enhance public safety by ensuring there is better preparedness for, and protection from, terrorist attacks. Martyn's Law will place requirements on those responsible for certain premises and events to fulfil necessary, but proportionate, steps. The Civic Centre will fall into the top tier and other Council properties are likely to be impacted. The EP team have started to support those responsible for our properties to review their current arrangements and identify improvements that need to be made to ensure the Council is compliant in the future. This has included some training opportunities and discussions with some of the key suppliers used to support events on site. The team will also be looking at how they support non council premises within the borough.

## Risk Scores

	I	L	T	Trend
<b>CURRENT</b>	<b>4</b>	<b>3</b>	<b>12</b>	
Previous	4	3	12	
Target	3	3	9	

## Key Controls & 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.



# J. Emergency Preparedness, Response and Recovery

## ◆ Action Plan

Ref	Action	Target Date	Status	Comments
<b>Follow-up of Previous Actions – March 2025</b>				
1.	Complete implementation of recommendations from external review.	September 2025	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	In progress	Good progress made via SMG and a number of new volunteers.  Work is progressing on an e-learning package for all staff and input into the new manager induction.
3.	Review Governance Structures for EP&R internally.	March 2026	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	In progress	This work has commenced and will be a key focus for the team in 2025. Also overlaps with the Grenfell action plan.  All services asked to review their plans by the end of August 2025. Learning will then be collated and shared.
5.	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	In progress	51 actions agreed with CMT in February 2025 via detailed action plan.
<b>New Actions – September 2025</b>				
1.	Review the HALO arrangements, to ensure there is 24/7 availability.	March 2026	In progress	
2.	Support the implementation of Martyn's Law for council properties and non council properties.	Sept 2026	In progress	Some initial discussions had with Civic Centre teams and sharing of training events with partners.



# K. Risk of a serious incident or wider safeguarding concern involving a vulnerable adult

## Risk Details

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.


## 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
CURRENT	4	3	12	
Previous	4	2	8	
Target	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'

## K. Risk of a serious incident or wider safeguarding concern involving a vulnerable adult

### ◆ Action Plan

Ref	Action	Target Date	Status	Comments
<b>Follow-up of Previous Actions – March 2025</b>				
1.	“NEED TO KNOW” escalation form and process to be revised and updated within Adult Social Care	January 2025	<b>Complete</b>	
2.	Safeguarding Mosaic Process flows being reviewed in line with the proposed ASC Restructure, ensuring efficient processes and clear roles and responsibilities within teams	January 2025	<b>Complete</b>	
3.	Independent Review of progress by Dr Adi Cooper against her original review and recommendations	June 2025	<b>In progress</b>	Extended action plan is been drawn up following SA review by Adi Cooper
<b>New Actions – September 2025</b>				
None proposed.				

# L. Non-compliance with Statutory Housing Duties

## Risk Details

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.

## Risk Update

As landlord, the Council must comply with statutory health and safety duties covering Fire, Legionella, Asbestos, Gas, Electric and Lifts (FLAGEL). Failure to do so breaches consumer standards and risks sanctions from the Regulator of Social Housing (RSH).

In April 2025, Brent self-referred to the RSH over fire safety concerns. Subsequent reviews identified similar issues in water safety and asbestos. In May 2025, the RSH issued a regulatory judgement, grading the service C3 and citing serious failings, including:

12,500 fire risk actions recorded as closed without evidence of completion, with some not completed at all  
Inconsistent and irreconcilable compliance data across fire, smoke/CO, asbestos and water safety  
Nearly half of homes lacking a recorded stock condition survey


An Audit was carried out by Caldiston that identified some issues and recommendations that are being formulated into a trackable and deliverable Action Plan

In response, Brent now meets the RSH monthly, has strengthened the compliance team, engaged additional contractors and is working with Caldistons to cleanse data and rebuild True Compliance.

However, the Council has fallen behind with Building Safety Cases, none of which have yet been accepted by the Building Safety Regulator (BSR). Notices for breaches have been served, and external consultants (Firntech) are now completing and submitting cases. FRAEWs for high-rise blocks were also not carried out as required; Firntech will now undertake these alongside the Building Safety Cases.

The only completed action to date has been resident engagement in high-rise blocks.

## Risk Scores

	I	L	T	Trend
<b>CURRENT</b>	<b>5</b>	<b>5</b>	<b>25</b>	
Previous	5	2	10	
Target	5	1	5	

## Key Controls & Mitigating Actions

- Monthly FLAGEL compliance reporting to DMT.
- Engagement of Health and Safety consultants
- CMT Periodic reporting,
- Monthly contractor meetings
- Fortnightly meeting with quality management consultants
- Building a centralised compliance system covering FLAGEL and other areas of compliance
- Extra resource with dedicated workstream leads
- Monthly meeting with RSH
- Monthly meeting with BSR
- New Assurance board reporting in to CEO
- Developing a Compliance Framework

## L. Non-compliance with Statutory Housing Duties

### ◆ Action Plan

Ref	Action	Target Date	Status	Comments
<b>New actions replacing superseded actions from March 2025</b>				
1.	Rebuild True compliance with Acurate Data	December 2025	In progress	Working with Caldistons we cleansing TC to ensure we have accurate data and are able to produce meaningful reports and monitor failings
2.	Provide building safety case reports for all high-risk buildings	March 2026	Not started	No BSCs have been accepted by the BSR we have commissioned a Firntech to develop and submit these for us
3.	Develop an action plan to bring us back to full compliance following the findings of the audit. To enable us to recover the C3 grading from the RSH	March 2027	In progress	The action plan is being developed in collaboration with Caldistons
4.	Northgate and True Compliance Integration	October 2026	In progress	We are rebuilding NEC which will be done in stages. The first will be repairs which is envisaged to be completed March 2026
5.	Recruit to key posts in the Building Safety structure	October 2025	In progress	Recruitment continues with a Building safety manager in place and an Electrical manger imminent. We have also increased the admin function
6.	Develop a new cycle of reporting to ensure full governance	October 2025	In progress	Reporting cycle will go from DMT to CMT then t the RSH and GLA.
7.	Procure Compliance contracts and issue new servicing and surveying programs	March 2026	In progress	New contracts are needed to replace poorly performing contractors who's contracts have been extended. Permission has been sought to draw down from frameworks for ease and speed
<b>New Actions – September 2025</b>				
1				

# M. Contract Management

## Risk Details

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.

## Risk Update

The Council commissioned an independent peer review of Procurement that included a contract management (CM) theme. The report and recommendations were issued in April 2025 and approved in full by CMT in May 2025. A key recommendation was to **establish a Procurement Improvement Programme (PIP) to drive change which includes a workstream on CM.**

For CM the review focused on: the strategic contracts register, the CM handbook, CM in directorates, roles and responsibilities, social value in CM and the database of contracts.  
A workstream with representatives from all directorates and chaired by a highly experienced contract manager was established in August 2025 and meets fortnightly. The priorities and progress of this workstream are:

1. Adopt a 3-tier contract segmentation process to review all council contracts to identify how they be managed.  
*The esteemed Local Partnerships model with 7 criteria plus value is currently being piloted to segment contracts into gold, silver and bronze. It will be tweaked to ensure it is robust and aligned to the council.*
2. Clarity of council approach to and policy for contract management with clear roles and responsibilities.  
*The existing CM Policy is currently being updated to reflect modern best practice and council priorities. Over time this will be updated to provide tools, templates and guidance for contract managers. A draft RACI is to be shared with directorate reps on the workstream for feedback, agreement and roll out.*
3. Improve the quality of data relating to contracts and establish one central, robust database.  
*A scope of work is being developed for a sub-team to improve data quality, define needs of a new database and evaluate on-the-shelf solutions and manage any migration. Sub-project costs to be established.*
4. Improve skills and capabilities at managing contracts across the whole council.  
LBB has been accepted on the next wave of the CM Pioneer Programme commencing Jan 2026, developed by the Cabinet Office and the LGA. Between 5 and 10 participants will reach Practitioner status with the online Foundation training required for all contract managers.

Further Activities for the CM Workstream include

- Supporting gateway 3 and 4 reviews
- Developing CM savings opportunities
- Determine whether the model of CM “hubs”, in place in some directorates, is viable council wide.

Together, it is anticipated all the above will improve: the understanding of contract risk in the council, the management and mitigation of contract risk, the capability of contract managers, and performance reporting on high value and high-risk contracts. Culminating in reduction in of the risk rating.

Risk Scores	I	L	T	Trend
CURRENT	3	3	9	
Previous	3	3	9	
Target	3	2	6	

## Key Controls & Mitigating Actions

- Controls are being established through the Procurement Improvement Programme.
- Update approach to contract segmentation & tiering: Segmentation through a new 3-tier model, in line with Local Partnerships best practice, will determine level of CM, governance and reporting required.
  - Updated CM Policy and clear, agreed roles and responsibilities are under development.
  - Project to improve accuracy of data contract register, develop a more robust solution than spreadsheets and de-commission other contract databases. Periodic data audits on can follow up to ensure improvements.
  - Improve skills and capabilities in CM.

# M. Contract Management

## ◆ Action Plan

Ref	Action	Target Date	Status	Comments
<b>Follow-up of Previous Actions – August 2025</b>				
1.	Ensure Procurement are prepared to implement the requirements of the new Procurement Act.	Feb 2025	Complete	P Act went live in Feb 2025 with good readiness for new procurement and contract management activities.
2.	Undertake a second round of Gateway 4 reviews of contracts due to be procured.	Ongoing	In progress/ Complete	Gateway reviews will continue to be presented to CPCMA B judge the efficiencies to be made: during contract term, for re-procurements and extensions. This is becoming BA
3.	Undertake a session with the Commissioning Network relating to contract management requirements and good practice.	Ongoing	Complete	Training for Contract Management requirements under the Procurement Act was provided in early 2025.
4.	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	Complete	Bitesize training sessions were developed and delivered Jan-Mar 25. This are part of the Procurement Training courses and will be reviewed as part of the PIP.
5.	Commission independent review of Procurement and develop and deliver improvement plan to implement recommendations	April 2026	Complete	Report issued April 25 leading to Procurement Improvement Programme to deliver the recommendations endorsed by CMT in May 2025 and programme mobilisation May/June2025
<b>New Actions – September 2025</b>				
6.	Further CM training will be provided under the Procurement Improvement Programme through 2025-2027.	April 2026	In progress	
7.	Deliver the CM workstream under the Procurement Improvement Programme – the priorities of which are: <ol style="list-style-type: none"> <li>1. Adopt a 3-tier contract segmentation process to review all council contracts to identify how the be managed.</li> <li>2. Clarity of council approach to and policy for contract management with clear roles and responsibilities.</li> <li>3. Improve the quality of data relating to contracts and establish one central, robust database.</li> <li>4. Improve skills and capabilities at managing contracts across the whole council.</li> </ol>	Ongoing	In progress	See comments on summary slide