

FWH Risk Register																	
Strategic objective	Strategic Risk	Ref	Risk	Level of control	Recent developments	Pre-mitigation score			Trend	Mitigating action	Owner (FWH)	Owner (SLA)	Timescale	Action status and update	Post-mitigation score		
						Likelihood	Impact	Score							Likelihood	Impact	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		Non-compliance with statutory obligations due to incomplete or inaccurate H&S certification and data	Significant control through SLA	In May 2025 the Council referred to the regulator following concerns that compliance actions for FRA, WRA, Asbestos had been closed down without supporting evidence	4	5	20	↑	Commission a full review of FWH compliance	Strategic Support Officer	Head of Property Services	Dec-25	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 bi-annual report from the H&SFWH 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	n/a	Ongoing	Strategy is being progressed, but no significant outcomes reported to date	2	5	10
			FWH has two blocks (Addis and Annoux 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	Significant control both directly and through SLA	FWH has two blocks (Addis and Annoux 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	n/a	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
		3	FWH is non-compliant with requirements of building safety regulations	Significant control both directly and through SLA	FWH is non-compliant with requirements of building safety regulations	1	5	5	↔	Continue compliance with requirements of Building Safety Act and other relevant legislation	Strategy & Delivery Manager	n/a	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, exacerbated by welfare reform and changes to the council tax support scheme	Significant control through SLA	Income collection continues to be challenging this financial year, in part due to reduced team capacity following staff turnover and long-term absence. Recruitment has been completed, including a newly created third officer post, with onboarding underway	4	4	16	↔	Implement plans to improve rent collection rates. Monitor arrears trends linked to welfare reform and council tax changes. Develop tailored support pathways for at-risk tenants	Strategic Support Officer	Head of Housing & Neighbourhoods	Mar-25	HMS have implemented a new dashboard to monitor performance. Proposals for former tenant areas collection will be presented to the July Board.	3	3	9
			Void turnaround times remain above target. Property Services are significantly under-resourced and currently unable to deliver the surveying function under the SLA due to recruitment and retention challenges. Delays also persist at the lettings stage, linked to limited Housing Management capacity and delays in receiving nominations.	Significant control through SLA	Void turnaround times remain above target. Property Services are significantly under-resourced and currently unable to deliver the surveying function under the SLA due to recruitment and retention challenges. Delays also persist at the lettings stage, linked to limited Housing Management capacity and delays in receiving nominations.	5	4	20	↑	Implement plans to reduce void turnaround times. Review and implement alternative delivery models for surveying services, including potential internal restructuring and external support options, to improve capacity and reduce delays.	Strategic Support Officer	Head of Property Services	Dec-25	A voids improvement group is in place. Turnaround times and void numbers are expected to improve. Housing Management has recruited two new officers and a temporary resource to support lettings. Officers are reviewing options for delivering the surveying function, including the potential to move the role under the Strategy and Delivery Manager to improve oversight	3	3	9
		5	High void turnaround times, costs and rent loss lead to financial losses for FWH	Significant control through SLA	New risk following Board feedback at April review. Directors asked to provide feedback	5	4	20	↑	Implement plans to reduce void turnaround times. Review and implement alternative delivery models for surveying services, including potential internal restructuring and external support options, to improve capacity and reduce delays.	Strategy & Delivery Manager	Head of Property Services	Oct-25	Officers are reviewing options for delivering the surveying function, including the potential to move the role under the Strategy and Delivery Manager to improve oversight	3	3	9
		6	Limited availability of surveyors contributes to delays in void turnaround times and increased rent loss	Significant control through SLA	Score increased to reflect Council position				↑	Develop and implement tailored fraud risk assessment. Carry out annual review of governance and internal control	Strategic Support Officer		Ongoing	All staff carry out annual awareness courses, and regular improvements to Brent internal systems are made	2	3	6
		7	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	↔	Regularly monitor economic environment and financial performance, including biannual stress testing of business plan	Strategy & Delivery Manager / Senior Finance Analyst	Head of Property Services	Sep-25	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 September meeting	2	4	8
		8	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	↔	All staff and directors to follow guidelines on cybersecurity and GDPR. The Council have implemented a centralised alerting platform which supports greater security logging	Senior Finance Analyst		Dec-25	Regular reviews are in place with next full business plan review due for December	2	5	10
		9	A cybersecurity incident results in a loss of income, data and/or reputational damage to the company and the Council.	Reasonable internal control	Score increased to reflect Council position	3	4	12	↑	Develop and implement tailored fraud risk assessment. Carry out annual review of governance and internal control	All		Ongoing	All staff carry out annual awareness courses, and regular improvements to Brent internal systems are made	2	3	6
		10	Fraud results in a loss of income and/or reputational damage to the company and the Council.	Significant internal control	Internal colleagues are supporting the companies in developing a tailored fraud risk assessment to strengthen controls and identify specific vulnerabilities	2	3	6	↔	Develop and implement tailored fraud risk assessment. 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 carried out in July 2025	2	3	6
		11	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	Recent change in Government, rent policy to be 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		Oct-25	Next stress test to take place in October 2025	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	12	FWH fails to meet the requirements of the Regulator's economic and consumer standards		The most recent review of FWH's regulatory compliance was carried out in July 2025. No major concerns were identified.	3	3	9	↔	Annual review of compliance with standards	Strategic Support Officer		May-26	Regulatory compliance review completed in July 2025 and next review due in May 2026	2
13	Poor service delivery gives rise to low tenant satisfaction			Significant control through SLA	FWH is required to meet all regulatory standards including the consumer standards. Current performance indicates FWH and Brent are below national and London benchmarks.	3	3	9	↔	Regularly measure tenant satisfaction against performance, and develop and implement targeted improvement plans	Strategic Support Officer	Head of Housing & Neighbourhoods	Nov-25	Next update to Board in November 2025	2	3	6
14	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	Nov-25	Next update to Board in November 2025	2	3	6
15	Disrepair in properties leads to poor tenant satisfaction, reputational damage and an increase in costs through legal settlements.			Reasonable control through SLA	Disrepair cases have stabilised following a notable increase over the past 1-2 years. While the volume of new cases has levelled off, ongoing risks remain for FWH. These include tenants being advised not to allow access for remedial works, delays in general repairs, and the financial impact of settlement costs. A clear legal framework exists for managing disrepair cases, which continues to guide our approach	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