FWH Risk Register

Strategic objective	Strategic Risk	Ref	Risk	Level of control	Recent developments	Pre-mitigation score: Likelihood	Pre-mitigation score: Impact	Pre-mitigation score: Score	Trend	Mitigating action	Owner (FWH)	Owner (SLA)	Timescale	Action status and update	Post-mitigation score: Likelihood	Post-mitigation score: Impact	Post-mitigation score: Score
Delivering safe and sustainable homes	FWH does not meet health & safety requirements - risk of injury or death to tenants, damage to property, financial and reputational damage	1	Non-compliance with statutory obligations due to incomplete or inaccurate H&S certification and data	Significant control through SLA	In May 2025 the Council self-referred to the regulator following concerns that compliance actions for FRA, WRA, Asbestos had been closed down without supporting evidence and subsequently received a C3 rating. In response to this Property Services have reviewed the structure of the compliance team and increased the number of managers to ensure effective oversight of compliance.	4	5	20	↔	The Council have initiated a Building Safety Compliance Project to ensure that identified remedial actions are completed, and have set a roadmap for full compliance. Timelines for recovery: Review of True Compliance by May 2026, Achieve 'C2' grade by September 2027 and 'C1' grade by September 2029.	Strategic Support Officer	Head of Property Services	May-26	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 i4B/FWH team	2	5	10
		2	Third party freeholders do not provide compliance information to FWH for communal areas in third party blocks, meaning FWH cannot verify that adequate compliance controls in place	Reliant on third party freeholders	Engagement continues to be challenging in this area and this is expected to continue to be the case	2	5	10	↔	Take forward strategy to delay payments for service charges etc. and engage with freeholders where information has not been provided	Strategy & Delivery Manager	n/a	Ongoing	Strategy is being progressed, but no significant outcomes reported to date	2	5	10
		3	FWH is non-compliant with requirements of building safety regulations	Significant control both directly and through SLA	FWH has two blocks (Addis and Arnoux Courts) requiring registration with and regular updates to the Regulator of Social Housing. Registration has been completed, all relevant information including Fire Risk Assessments is in place, and the latest quarterly survey to the Regulator was submitted in October 2024	1	5	5	↔	Continue compliance with requirements of Building Safety Act and other relevant legislation	Strategy & Delivery Manager	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, an income collection improvement plan was presented to Board in October and the work to implement this will be closely monitored by Officers. The team have recently lost a HCTSM and recruitment is underway to fill the vacant post with a temp being onboarded to support until the post can be filled permanently	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	Apr-26	HMS are building a new dashboard to monitor performance. Proposals for former tenant arrears collection are still being explored following a report to the July Board. The Council are currently developing a FTA collection policy which will be extended to the Housing Companies	3	3	9
		5	High void turnaround times, costs and rent loss lead to financial losses for FWH	Significant control through SLA	Void turnaround times remain above target but improvements can be seen. Property Services recruited a new voids manager on a temporary basis who is supporting the delivery of the surveying function under the SLA. Property Services are still facing challenges with permanent recruitment and retention. Delays also persist at stage 3, linked to delays in receiving nominations from Housing Needs.	5	4	20	↔	Implement plans to reduce void turnaround times	Strategic Support Officer	Head of Property Services	Dec-25	A voids improvement group is in place, chaired by the Head of Housing Management Property. Turnaround times and void numbers are expected to improve and progress is already being seen. Further update on the progress of the improvement group will be provided at the December Board	3	3	9
		6	Limited availability of surveyors contributes to delays in void turnaround times and increased rent loss	Significant control through SLA	A temporary surveying manager is now in post within Property Services and improvements have been seen to stage 2 void times. Further work still required to fill vacant posts with permanent staff	5	4	20	↔	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	Apr-26	Officers are reviewing options for delivering the surveying function as part of SLA renewals for 26/27, including the potential to move the role under the Strategy and Delivery Manager to improve oversight	3	3	9
		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 approved by Board in September 2025. Strategic decisions to be taken on approach to planned / capital works	3	5	15	↔	Develop asset management and decarbonisation strategy	Strategy & Delivery Manager / Senior Finance Analyst	Head of Property Services	Apr-26	Officers will now work with Property Services to commission stock condition surveys and take any necessary works forward	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	September 2025 CPI (3.8%) will cap rent increases for 2026–27 at 4.8%, above the current CPI of 3.6%.	2	5	10	↔	Regularly monitor economic environment and financial performance, including biannual stress testing of business plan	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 in a loss of income, data and/or reputational damage to the company and the Council and could cause disruption to council services which may impact residents.	Reasonable internal control	Score increased to reflect Council position	4	4	16	↑	All staff and directors to follow guidelines on cybersecurity and GDPR. The Council have implemented a centralised alerting platform which supports greater security logging	All		Ongoing	All staff carry out annual awareness courses, regular improvements to Brent internal systems are made, and the council conducts regular phishing simulations to raise awareness of cyber risks.	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		Completed	Scheme of delegation approved by Board; annual review of governance standards, including National Housing Federation Code of Governance carried out in July 2026	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		Jan-26	Next stress test to take place in January 2026	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	Significant control through SLA	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	3	6
		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, a Council-wide piece of work will be underway over the coming months including a new Housing and Tenant Satisfaction Improvement Programme	3	3	9	↔	Regularly measure tenant satisfaction against performance, and develop and implement targeted improvement plans	Strategic Support Officer	Head of Housing & Neighbourhoods	Mar-26	Most recent results suggest there is significant work required to improve tenant satisfaction, including a focus on resolving long-standing issues at Lexington	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 December 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	Dec-25	Next update to Board in December 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