

i4B Risk Register												Post-mitigation score					
Strategic objective	Strategic risk	Ref	Risk	Level of control	Recent developments	Pre-mitigation score			Trend	Mitigating action	Owner (i4B)	Owner (SLA)	Timescale	Action status and update	Likelihood	Impact	Score
Delivering safe and sustainable homes	i4B does not meet health & safety requirements - risk of injury or death to tenants, damage to property, financial and reputational damage	1	There is a risk that i4B may not fully meet its statutory health and safety obligations if certification, data accuracy, or follow-up of compliance actions are incomplete. As i4B relies on the Council's Property Services for compliance delivery under the SLA, any gaps or delays within Council processes could expose i4B to legal, financial, and reputational risk, and may impact tenant safety.	Significant control through SLA	The Council continues to implement its wider Building Safety and Compliance Improvement programme following its self-referral to the Regulator. Although this work is expected to strengthen compliance controls used by i4B through the SLA, the Board has highlighted that the likelihood score should not remain high indefinitely. Once the Council's enhanced compliance framework is embedded and data quality improves, the likelihood of non-compliance should reduce. A further review of this risk and its scoring is expected at the next cycle.	4	5	20	↔	Continue working closely with Property Services to ensure all statutory checks are completed and evidenced in a timely way. Strengthen monitoring arrangements through improved reporting, regular audit of compliance data, and clear escalation where actions are not completed. Align i4B's compliance tracking with the improvements being made through the Council's compliance programme, and prepare for a reassessment of the risk scoring once the new controls are fully embedded.	Strategic Support Officer	Head of Property Services	May-26	Compliance performance continues to improve, supported by additional management oversight and clearer accountability introduced through the Council's compliance recovery work. Some residual non-access risks remain, but overall processes are maturing. As requested by the Board, the scoring will be reviewed at the next update, informed by progress in the Council's compliance improvement programme.	2	5	10
		2	Third party freeholders do not provide compliance information to i4B for communal areas in third party blocks, meaning i4B 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. As agreed by Board, i4B will continue to only acquire freehold properties or leasehold properties in blocks owned by local authorities and housing associations	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	i4B is non-compliant with requirements of building safety regulations	Significant control both directly and through SLA	i4B has one block, Lexington, requiring registration with the Building Safety Regulator. Registration has been completed, all relevant information including an up-to-date Fire Risk Assessment is in place, and the Building Safety Case has been submitted	1	5	5	↔	Continue compliance with requirements of Building Safety Act and other relevant legislation	Strategy & Delivery Manager	n/a	Ongoing	Following the submission of the Building Safety Case there are no outstanding actions for i4B here	1	5	5
Running a viable business	i4B 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 face pressure as tenant affordability is affected by wider cost-of-living impacts. Officers have incorporated these financial stress factors into arrears monitoring and tenant support assessments. HMS are implementing a new dashboard to improve visibility of rent collection performance.	4	4	16	↔	Implement targeted rent collection improvement measures and strengthen early-intervention processes for tenants at risk of arrears. Enhance collaborative working with Council teams to ensure support pathways are available for households experiencing affordability pressures. Monitor arrears trends linked to welfare reform and cost-of-living indicators, and refine operational responses accordingly.	Strategic Support Officer	Head of Housing & Neighbourhoods	Jul-26	HMS continues to roll out performance dashboards to support improved arrears monitoring. Tenant affordability pressures are now explicitly incorporated into analysis and interventions. Work is underway to stabilise staffing and maintain continuity in income collection activity. Former tenant arrears collection options are still being reviewed as part of the Council's broader policy work.	3	3	9
		5	High void turnaround times, costs and rent loss lead to financial losses for i4B	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	Apr-26	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 within HMS 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	↔	Implement asset management and decarbonisation strategy	Strategic Support Officer / 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, with additional pressure from international economic trends such as US monetary policy	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%. Phase 3 loan negotiations are due to be finalised in December 2025, the interest rate will be based on the PWLB loan rate at the time the funding is drawn down, but significantly higher than the previous 3.7% funding.	3	4	12	↔	Regularly monitor economic environment and financial performance, including biannual stress testing of business plan	Senior Finance Analyst		Mar-26	Regular reviews are in place	2	5	10
		9	Company cash flow (capital and revenue) is insufficient to manage expenditure	Significant control through budget management	No major developments to report	3	5	15	↔	Regularly monitor financial and rent collection performance, including biannual stress testing of business plan	Senior Finance Analyst		Apr-26	Regular reviews are in place with. Full business plan review set for January 2026	2	5	10
		10	Changes in Government policy on Local Housing Allowance (LHA), welfare benefits, or inflation may limit i4B's ability to set rents at levels assumed within the business plan, reducing income and affecting financial viability.	None other than link to Council lobbying role, can exercise caution through business planning	i4B rents are linked to Local Housing Allowance (LHA) rates. There is no Government commitment to increase LHA annually, and future LHA changes remain subject to ad-hoc national policy decisions. The absence of inflation-linked uplifts creates uncertainty for i4B's income projections. For i4B, the key risk driver is therefore the possibility that LHA freezes continue into 2026/27, constraining rent levels despite rising management costs, inflation, and interest rates.	2	3	6	↔	Regularly monitor economic environment and Government policy, including biannual stress testing of business plan	Senior Finance Analyst		Apr-26	Next stress test to take place in April 2026	2	3	6
		11	A cybersecurity incident results 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	Following engagement with Council colleagues, the risk has been updated to reflect improvements in Brent's cyber security posture, including enhanced alerting, training, and incident-prevention capabilities.	3	4	12	↑	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.	3	4	12
		12	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	Head of Change and Customer Insight		Completed	Scheme of delegation approved by Board; annual review of governance standards, including National Housing Federation Code of Governance, takes place with the next review due in July 26	2	3	6
Providing a consistently good housing service	i4B's properties are not managed effectively - risk of tenant dissatisfaction, increase in complaints and reputational damage	13	Costs of remediation to the Granville and Princess Road blocks exceed business plan estimates	i4B is major leaseholder in works programme being commissioned by Brent Council; reasonable input into design and costings	Design, specification and procurement are being managed by the Council's Major Works and Refurbishment team. i4B will be liable for approx. 22% of the cost of work, the latest update received is that these works are unlikely to commence during 2025/26	3	2	6	↔	Receive regular updates from council on procurement process	Strategy & Delivery Manager		Ongoing	Cost certainty will increase as the project moves along, and the business plan will be kept up-to-date accordingly. i4B representatives attend design workshops etc.	1	2	2
		14	i4B does not effectively manage its contract for the management of Home Counties properties, leading to poor performance and risk to tenant satisfaction	Reasonable control through contract	Pinnacle took over the Home Counties housing management contract in July. To support a smooth onboarding process, officers are holding weekly meetings with Pinnacle's Operational teams. These sessions are focused on closely monitoring the implementation of the contract and fostering strong working relationships.	4	4	16	↔	Closely monitor performance under the contract through regular meetings, performance reporting and Board attendance	Strategy & Delivery Manager		Apr-26	Pinnacle to attend the April Board	2	3	6
		15	Poor service delivery gives rise to low tenant satisfaction	Significant control through SLA	Publication of the latest tenant satisfaction results has been delayed due to under-resourcing within the Performance Team. The Performance Team expects to complete validation and release the updated results by April 2026, after which the findings will be incorporated into FWH/i4B performance reporting and the risk will be reassessed.	3	3	9	↔	Regularly measure tenant satisfaction against performance, and develop and implement targeted improvement plans	Strategic Support Officer	Head of Housing & Neighbourhoods	Apr-26	Officers are working closely with the team to support completion of the outstanding tenant satisfaction dataset. Updated results are expected in April 2026, after which the impact on service quality and the risk rating will be reassessed. Improvement planning will be refreshed once the data is available.	2	3	6
		16	Poor complaints management procedures lead to low tenant satisfaction	Significant control through SLA	Also part of consumer standards. A separate complaints hierarchy has been set up on the system for the housing companies, with the next 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. Following feedback from the Chair, during 2026/27 the Strategic Team will sign off all complaints before responses are issued, to ensure quality, consistency, and clearer oversight of complaint handling.	Strategic Support Officer	Head of Housing & Neighbourhoods	Jun-26	Next update to Board in June 2026	2	3	6
		17	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 i4B. 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 i4B disrepair cases, which will be fed into performance reports and financial reports	2	3	6

Increasing the supply of affordable housing	i4B is unable to acquire properties and cannot contribute to increasing affordable housing supply in the borough	18	There is an insufficient volume of street property acquisition properties on the market that meet i4B's financial criteria	Subject to market conditions	Momentum in the acquisitions programme has continued into the final quarter of the year. i4B has completed on 6 properties to date, with an additional 4 properties progressing through the final stages of conveyancing. Market conditions remain challenging due to price pressures and limited suitable stock, but the pipeline activity indicates continued delivery against the annual target as the year closes.	2	3	6	↔	Continue street property acquisitions	Strategy & Delivery Manager	Ongoing	To date in 2025/26, i4B has completed on six properties. A further 4 are in the final stages of conveyancing and are expected to complete shortly, subject to legal checks and final approvals. Performance remains broadly on track given market conditions, and officers continue to progress remaining opportunities to support achievement of the acquisition target.	2	3	6	
			19	There is an insufficient amount of development opportunities that meet i4B's financial criteria	Subject to market conditions	No recent developments	3	2	6	↔	Continue to review potential block acquisitions and new build purchases	Strategy & Delivery Manager	Ongoing	No developments are assumed in the business plan, so any progressed opportunities will represent an additional benefit to the company and Council. i4B team links with teams in Council such as Property, Development and Planning continue to be good with regular conversations held and i4B representatives on internal boards	2	2	4
			20	i4B has insufficient capital to fund new acquisitions, and therefore meet its goals of reducing homelessness	Subject to market conditions and strategic direction of Council	Phase 3 loan terms approved at December board meeting	2	3	6	↔	Engage the Council on future investment in i4B	Strategy & Delivery Manager	Ongoing	The Council has agreed to provide further funding for i4B to continue its acquisition programme	2	2	4