

FWH Risk Register														Pre-mitigation score			Post-mitigation score		
Strategic objective	Strategic Risk	Ref	Risk	Level of control	Recent developments	Likelihood	Impact	Score	Trend	Mitigating action	Owner (FWH)	Owner (SLA)	Timescale	Action status and update	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	1	There is a risk that FWH may not fully comply with statutory health and safety requirements if certification, data, or follow-up actions are incomplete or inaccurate. As an RP, any failure to meet statutory or landlord safety obligations could expose FWH to enforcement action under the RSH consumer standards, as well as legal, financial, and reputational harm.	Significant control through SLA	The Council's wider Building Safety and Compliance recovery programme continues to progress following its self-referral to the Regulator. This work is expected to strengthen the compliance framework used by FWH through the SLA. The Board has requested that the likelihood rating be reviewed, noting that it should reduce as these improvements embed and evidence of sustained compliance becomes available. A more detailed reassessment is provided once further updates from Property Services are provided.	4	5	20	↔	Continue working with Property Services to ensure all statutory checks are completed, evidenced, and recorded accurately. Strengthen oversight through improved reporting, regular validation of compliance data, and clear escalation where actions are delayed. Align FWH's monitoring with the Council's compliance improvement programme, and prepare to update the risk score when stronger assurance is available.	Strategic Support Officer	Head of Property Services	May-26	Ongoing improvements in governance, oversight, and data quality are beginning to address previous weaknesses in compliance processes. While some residual risks remain, progress made through the Council's compliance programme should lead to a reduction in likelihood once fully embedded. A full review of this risk will be presented at the next Board following updated input from Property Services.	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 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 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	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 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 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.	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	Changes to Government rent policy, CPI levels, or welfare benefits may alter the permitted rent increases under the RSH Rent Standard, impacting FWH's ability to achieve planned rental income and maintain financial viability.	None other than link to Council lobbying role, can exercise caution through business planning	From 1 April 2026, the Rent Standard 2026 applies, confirming that social and affordable rents may generally increase by CPI (September) + 1% each year under the Government's 10-year rent settlement. The September 2025 CPI was 3.8%, so the 2026/27 rent increase limit is 4.8%. This provides a stable, predictable framework for rent-setting in 2026/27	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		
		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	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 FWH4iB 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		
		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 next report to come to the Joint Board	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		
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 rental 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				