Strategic Risk Report

September 2026

Risk Evaluation Matrix

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

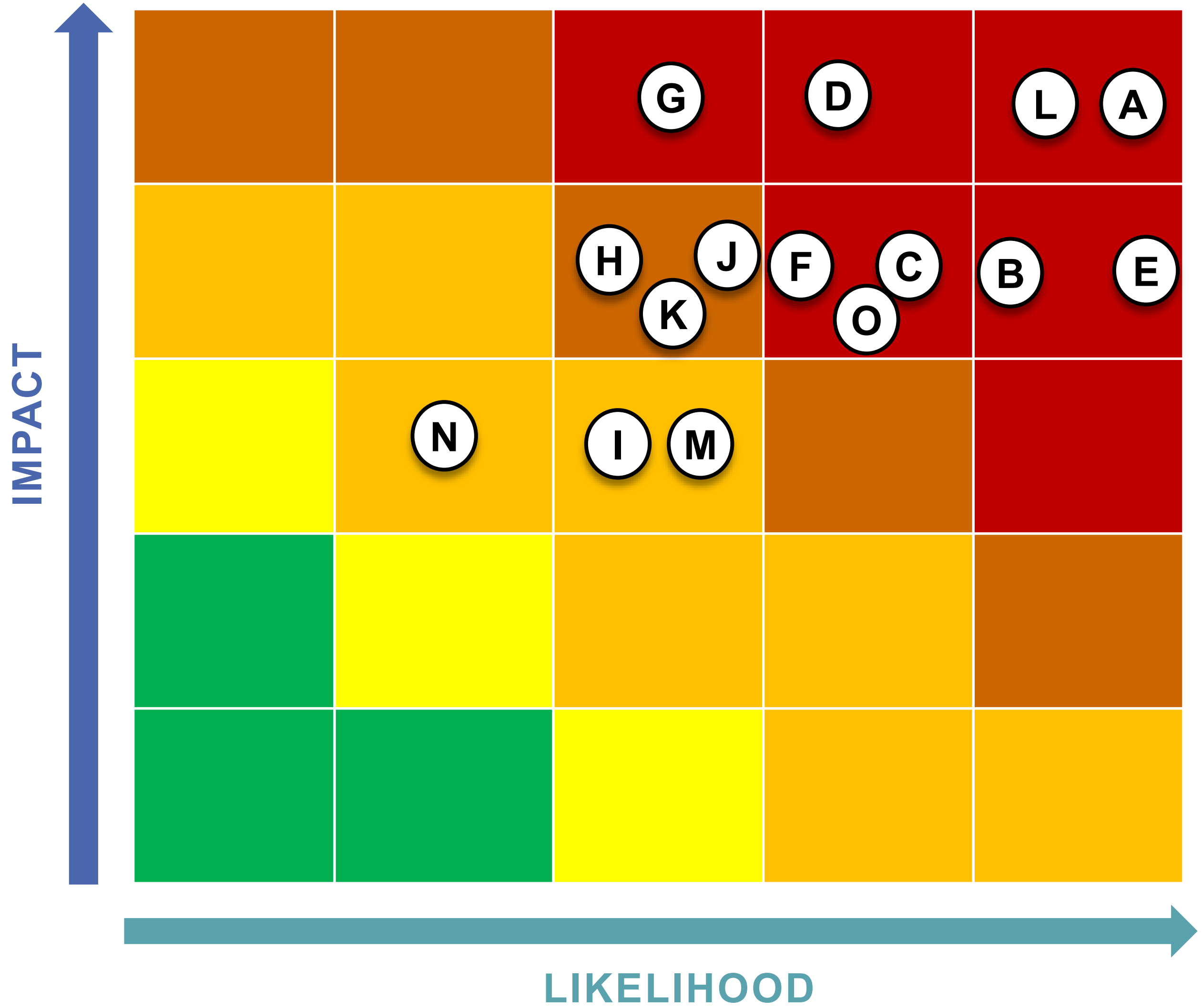
IMPACT

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 Serious Child Protection Incident
I.	Recruitment and Retention
J.	Emergency Preparedness
K.	Safeguarding Incident - Adults
L.	Non-compliance with Statutory Housing Duties
M.	Contract Management
N.	AI Risks
O.	Business Continuity

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	**25** (I:5 L:5)	**25** (I:5 L:5)	↔	**10** (I:5 L:2)	+15
B.	**Cost of Living Crisis**	Head of Resident Experience	**20** (I:4 L:5)	**20** (I:4 L:5)	↔	**15** (I:3 L:5)	+5
C.	**Increase in Dedicated Schools Grant High Needs Block Deficit**	Director Education Partnerships & Strategy	**16** (I:4 L:4)	**20** (I:4 L:5)	↓	**8** (I:4 L:2)	+8
D.	**Risks to Community Cohesion**	Director Community Development	**20** (I:5 L:4)	**20** (I:5 L:4)	↔	**15** (I:5 L:3)	+5
E.	**Climate & Ecological Emergency Mitigation, Adaptation and Resilience**	Head of Environment Strategy & Climate Action	**20** (I:4 L:5)	**20** (I:4 L:5)	↔	**20** (I:4 L:5)	=
F.	**Cyber Attacks**	Managing Director, Shared Technology Service	**16** (I:4:L4)	**12** (I:4 L:3)	↑	**9** (I:3 L:3)	+7
G.	**Financial Resilience and Sustainability**	Deputy Director of Finance, Corporate and Financial Planning	**15** (I:5 L:3)	**15** (I:5 L:3)	↔	**10** (I:5 L:2)	+5
H.	**Risk of a serious child protection incident or wider safeguarding concerns**	Director Early Help and Social Care	**12** (I:4:L3)	**12** (I:4 L:3)	↔	**12** (I:4 L:3)	=
I.	**Recruitment and Retention**	Director Human Resources & Organisational Development	**9** (I:3:L3)	**9** (I:3 L:3)	↔	**6** (I:3:L2)	+3
J.	**Emergency Preparedness, Response & Recovery**	Deputy Head of Resilience	**12** (I:4:L3)	**12** (I:4 L:3)	↔	**9** (I:3 L:3)	+3
K.	**Safeguarding Incidents - Adults**	Director Adult Social Services	**12** (I:4 L:3)	**12** (I:4 L:3)	↔	**8** (I:4 L:2)	+4
L.	**Non-compliance with Statutory Housing Duties**	Director Housing Services	**25** (I:5 L:5)	**25** (I:5 L:5)	↔	**5** (I:5:L1)	+20
M.	**Contract Management**	Director of Strategic Commissioning, Capacity Building & Engagement	**9** (I:3:L3)	**9** (I:3 L:3)	↔	**6** (I:3:L2)	+3
N.	**AI Risks**	Digital Programme Manager AI, Agentic Automation and Conversational AI	**6** (I:3 L:2)	**12** (I:4 L:3)	↔	**4** (I:2:L2)	+2
O.	**Business Continuity**	Deputy Head of Resilience	**16** (I:4 L:4)	n/a – 'new' risk	n/a	**9** (I:3 L:3)	+7

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 Scores

Risk Scores	I	L	T	Trend
CURRENT	**5**	**5**	**25**	⟷
Previous	5	5	25	
Target	5	2	10	

Risk Update

Between August 2025 and July 2026, Brent Council received 8,882 approaches, an average of 24.3 per day. This financial year, Brent Council has received 3081 approaches – 24.8 per day. If this continued, the council would receive 9070 approaches, down 1.5% from 2025. However, over the past 30 days (up to 03.08.2026), there have been 681 approaches, or 22.7 per day. If this continued, the council would receive 8550 approaches, down 7% compared to 2025.

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 1,500 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 Act 2025 has now become law, and it is anticipated will have a positive impact on demand. This is because the ban of section 21 'no fault' evictions, which was implemented on 1 May 2026, and from 31 July 2026 all new possession claims will have to proceed under section 8 instead. Landlords will be able to serve a section 8 notice for reasons such as rent arrears, anti-social behaviour, selling the property or where a close family member needs to move back in – however, they'll need to provide clear evidence to support the grounds, and the claim can still be contested by the tenant. .. The decrease in demand over the past 30 days may be as a direct result of the implementation of the Renters' Rights Act 2025, although it is too early to be sure.

Officers are also working with providers to increase the supply of self-contained leased accommodation. Although this will still be TA, the term of the lease will be 10 years, which means the council will be able to charge the current LHA rate as opposed to the TA subsidy ate of 90% of the 2011 LHA rate.

The Preventing Homelessness Work Programme has implemented an action plan with OKR's monitored by the SRO Delivery Board.

Key Controls & Mitigating Actions

- The Preventing Homelessness Programme is working at pace to mitigate risk and reduce cost to the council.
- Work with Greenlight to step down the most expensive placements has saved over £660,000 to date and should save £1m pa going forward. Since September, average gross unit cost of stage 1 TA has reduced 1.4%.
- Work with Beam to drive up preventions by directly offering private rented sector accommodation to families at risk of homelessness has saved an estimated £317k in 2025-26. Work with Beam to move families out of TA has saved the council circa £118k in 2025-26. Work in 2026-27 is ongoing, having supported 40 families already.
- Increase the supply of self-contained leased accommodation for over 10 years.

A. Lack of Supply of Affordable Accommodation

♦ Action Plan

Ref	Action	Target Date	Status	Comments
Follow-up of Previous Actions				
1.	Increase supply through the Council Homes Acquisition Programme (CHAP) programme in 25/26	March 2026	Completed 31 March 2026	Due to the restrictive eligibility criteria of the CHAPS programme, the indicative bid was revised to 6 properties. All 6 were acquired by the deadline of 31st March 2026. – Target met
2.	To continue to acquire street properties through i4B.	March 2027	In progress	As of 31st July 2026, completed on 17 properties. A further 6 properties in conveyancing with an additional 6 properties under negotiation.
3.	Increase supply through the Local Authority Housing Fund (LAHF) programme in 25/26	March 2026	completed	LAHF Round 3 2025/26 We have acquired 40 properties; 2 properties are in conveyancing and scheduled to complete by September 2026 – Target of 42 met.
New Actions – September 2026				
4.	Increase the supply of self-contained, settled leased accommodation, through 10 year + schemes	March 2027	In progress	Officers are also working with providers to increase the supply of self-contained leased accommodation for over 10 years. Due to the length of the lease, providers are willing to accept lower costs, and the council can reclaim 100% of the 2024 LHA rather than 90% of the 2011 LHA rate. In April, Cabinet approved schemes to bring on around 367 units of such accommodation, associated with savings of circa £3.5m pa
5.	Increase supply through the Local Authority Housing Fund (LAHF) programme in 26/27	March 2027	In progress	LAHF Round 4 Target of 18 properties for 2026/27. We currently have 6 properties in conveyancing and 3 properties in negotiation. We are actively reviewing the market to meet the target for this year.
6.	Preventing Homelessness Work Programme	March 2027	In progress	A detailed work programme has been implemented with OKR's monitored by the SRO Delivery Board. The Work Programme focuses on; • Improving the Housing Needs & Support Directorate • Preventing homelessness • Reducing the cost of temporary accommodation

B. Cost of Living Crisis

Risk Details

The ongoing financial pressures facing residents continue to present a significant risk to Brent. While inflation has reduced from its peak, many households continue to experience financial hardship due to high housing costs, rising rents, increased living expenses and wider economic uncertainty. These pressures are contributing to sustained demand for council services, particularly homelessness prevention, financial support, welfare advice and social care services. Without effective intervention and support, there remains a risk of increasing resident vulnerability, worsening financial hardship and additional pressure on council resources and budgets

Risk Update

Financial pressures continue to affect many Brent residents, with high housing costs, rising rents, ongoing affordability challenges and economic uncertainty driving demand across council services. Brent's higher-than-average unemployment rates and lower household incomes mean many residents remain particularly vulnerable to financial hardship.

Demand for homelessness services remains significant, with homelessness applications increasing from 5,948 in 2021/22 to 7,300 in 2023/24, with 6,281 applications received in 2024/25. This sustained demand continues to create both operational and financial pressures for the Council. To support long-term financial sustainability, the revised Council Tax Support (CTS) Scheme was introduced in April 2025, including a 35% minimum contribution for working-age households.

The Council continues to provide extensive support to residents experiencing financial hardship. Between 1 April 2024 and 31 March 2026, the Resident Support Fund (RSF) supported 7,909 applicants, providing £6,106,395.96 towards household bills, Council Tax, food, fuel, digital equipment and emergency support. A further 1,287 residents received digital support.

Building on this approach, the Crisis and Resilience Fund (CRF) was introduced in April 2026, shifting the focus from crisis intervention to prevention, income maximisation and long-term financial resilience. Delivery is being strengthened through the Household Income Maximisation (HIM) Team and implementation of the LIFT platform, enabling a proactive, data-led approach to identifying and supporting vulnerable households before they reach crisis point.

The Council Tax Hardship Scheme continues in 2026/27, providing direct hardship relief, targeted communications, self-service support, face-to-face and telephone assistance, and enhanced recovery processes. Since April 2026, the Council has received 1,118 hardship applications, with 823 awards approved and 309 rejected. Awards total £366,137, with an average award of £445, and applications are processed within an average of 9 days.

Risk Scores	I	L	T	Trend
CURRENT	**4**	**5**	**20**	
Previous	4	5	20	
Target	3	5	15	

Key Controls & Mitigating Actions

- Brent's Resident Support Fund (RSF) operated from August 2020 and transitioned to the Crisis and Resilience Fund (CRF) on 1 April 2026, shifting the focus from crisis support to prevention, resilience and long-term financial wellbeing.
- The Community Wellbeing Service has supported 766 households (3,061 residents) in its first 18 months, delivering 8,406 food shops, 13,172 daytime meals, 14,465 evening meals and 806 referrals to specialist support services. The service has also delivered 142 wellbeing sessions with 1,556 attendances and facilitated 2,623 interactions with partner organisations, helping residents access advice, support and opportunities.
- Citizens Advice Brent supported residents from the 1 April 2025 and 31 March 2026, the service handled 7,203 advice requests and addressed 16,946 advice issues, supporting 569 households with debt and rent arrears. CAB secured £3.1 million in benefits and tax credits for residents, helped write off or reduce £380,000 of debt, and supported 393 households to prevent homelessness.
- With the new allocation of CRF funding, we are strengthening prevention approach through the Household Income Maximisation (HIM) Team and implementation of the LIFT platform, using data-led targeting to proactively identify vulnerable households, maximise income and prevent residents reaching crisis point.

B. Cost of Living Crisis

♦ Action Plan

Ref	Action	Target	Status	Comments
Follow-up of Previous Actions				
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 CWS including an extended 6-month membership to improve work readiness. In the first 6 months, the CWS has enrolled 139 members on a 6-month membership.
2.	To consider and agree how to best utilise any extension of the Government's Household Support Fund for 25/26. To monitor the agreed Cabinet- approved new three-year Crisis and Resilience Fund (CRF), providing a sustainable approach to supporting residents through financial hardship by shifting from short-term crisis intervention to prevention, income maximisation and long-term financial resilience.	March 2025	Complete	The Crisis and Resilience Fund (CRF) provides £15.0 million funding over three years (2026/27 to 2028/29). Cabinet has approved the new approach, which focuses on prevention, resilience and income maximisation alongside ongoing crisis support for residents experiencing financial hardship The Council Tax Hardship (13A) Fund is £1.5 million. 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 the implementation and impact of Brent's three-year Crisis and Resilience Fund (CRF)	1 April 2026 onwards	In Progress	The RSF model was approved by Cabinet in February 2024 and successfully delivered a more preventative approach to resident support. Building on this success, Cabinet approved the new three-year Crisis and Resilience Fund (CRF) and associated funding in March 2026, incorporating the RSF model into a longer-term programme focused on financial resilience, income maximisation and early intervention. Quarterly performance monitoring is undertaken to assess delivery, outcomes and impact, with six-monthly monitoring returns submitted to the DWP
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 Center 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.
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: https://www.citizensadvicebrent.org.uk/our-partners/

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 (EHCPs). 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 2025/26 was £20.2m, an increase of £6.6m over the financial year 2025/26 linked to the unavoidable use of independent schools, increased post-16 demand and the overall rise in numbers of children with EHCPs. To help manage pressures against the High Needs Block of the DSG, Schools Forum 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. This will not, however, continue in 2026/27 due to other pressures on school budgets. A key issue is that HNB funding increases (4.7% in 2025/26 and 3% in 2026/27) are not in line with increasing demand for EHCPs and access to SEND services (c8-10%). The monitoring of the DSG is reported on a quarterly basis via the finance forecast reports taken to Cabinet and Schools' Forum. The Corporate Director for CYPCD and the Director of Finance monitor measures included in HNB Management Plan that includes a range of measures to reduce HNB expenditure on a quarterly basis – these resulted in circa £2m of mitigated cost avoidance in 2025/26.

In line with the Government's SEND Reforms, published in February 2026, the HNB Management Plan has been refreshed. Current focus is on measures that are captured in the SEND Reform Plan that Brent submitted to the DfE for review in June 2026. These include, but are not limited to a) building more local special school capacity to reduce the need for children to be educated out of borough or the independent non-maintained sector; b) increasing the early intervention SEND support offer so that needs can be met without an EHCP using Experts at Hand grant funding and c) a focus on reducing EHCP demand from pre-school children which is high compared to statistical neighbours as part of school readiness/Best Start in Life work.

Both the Management Plan and the establishment of the Experts at Hand offer assume a slowdown in the annual growth of EHCPs, as early support and intervention becomes embedded. However, the impact of the White Paper SEND Reforms on demand for EHCPs is unknown, not least because increasing demand in recent years reflects the increasingly complex needs of young children and a growing post-16 cohort as children with EHCPs age. The Government has indicated that it could take up to 10 years for the new reforms to be fully embedded.

There has been limited opportunity to date 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 have been extended to April 2028. This has now been recognised by the DfE; if the DfE accepts Brents SEND Reform plan, they have committed to funding up to 90% of the cumulative HNB deficit. The DfE's position for future years, however, remains unclear.

Risk Scores	I	L	T	Trend
CURRENT	**4**	**4**	**16**	↓
Previous	4	5	20	
Target	4	2	8	

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 in line with SEND Reforms Expert at Hands offer to deliver early and targeted support to reduced the need for EHCPs.
- Brent SEND Reform Plan meets DfE criteria for up to 90% of DSG cumulative deficit to be paid by DfE.

C. Increase in Dedicated Schools Grant High Needs Block

♦ Action Plan

Ref	Action	Target Date	Status	Comments
Follow-up of Previous Actions				
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.	September 2028	In progress	A new Secondary Special School was delivered (Wembley Manor Sept 2025). A capital programme to establish Additionally Resourced Provisions in mainstream schools is nearing the end of the construction phase. A second phase of projects focused on additional special school capacity has been agreed by Cabinet in January 2026 and is moving forward. This includes use of the Strathcona site by Phoenix Arch Special School and development of other 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.	January 2027	In progress	SEN support activity is embedded into ways of working with schools and a headteacher reference group was supporting development of the offer prior to the Government's SEND Reforms published in February 2026. The SEND Reforms will significantly increase the early intervention support offer for children with SEND through £2m. The offer, that has been co-produced, will be delivered in school clusters and will go fully live in January 2027.
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 was paused due to insufficient HNB funding (linked to the increase not being in line with increasing demand) and anticipated national changes as part of the SEND Reforms.
4.	Continued Central Government lobbying for appropriate funding	April 2026	In progress	A response was provided to consultation on the SEND White Paper published in February 2026. Further action will be determined if Brent's SEND Reform Plan is not accepted.

New Actions – September 2026
Continuation of the actions above, as outlined in the comments.

D. Risks to Community Cohesion

Risk Details

The potential breakdown of community cohesion in Brent poses a significant risk. Brent's diversity is one of the borough's greatest strengths, but local relationships, trust and confidence can be affected by national and international events, hate crime, misinformation, anti-migrant sentiment, protest activity, local incidents and tensions in neighbouring boroughs. If not effectively managed this could lead to reduced trust, weaker relationships and polarisation among community members, impacting the overall well-being and safety of the area. It could increase vulnerability to extremist narratives.

Risk Update

Brent remains one of the most diverse boroughs in the country. The rich diversity of the population brings opportunities for cohesion and unity, but the borough is not immune to the risks of community tension and conflict. Local community sentiment is influenced by international events, national political debate, hate crime, misinformation, online hostility, anti-migrant sentiment and incidents affecting Brent and neighbouring boroughs. Based on the latest assessment provided by the Metropolitan Police, Brent's community cohesion risk remains **elevated but managed.**

The Council is mindful that tensions can escalate and may result in 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) previously identified Brent as a priority borough for community cohesion funding in 2024-25, reflecting the importance of sustained local prevention, engagement and reassurance activity.

Despite a period of de-escalation, the Israel-Gaza conflict continues to influence community sentiment and contribute to concerns linked to antisemitism and Islamophobia. The proscription of Palestine Action and the ongoing legal challenge against proscription continue to polarise community sentiment, with sporadic protests and arrests under terrorism legislation. Further tensions arise from USA-Iran and Israel-Lebanon conflicts, causing divisions within and between affected communities in Brent and neighbouring boroughs.

Recent issues have tested local cohesion, including the Kenton Synagogue attack and the terrorist attack in Golders Green affecting Jewish communities in Brent and neighbouring boroughs. Wider concerns persist in relation to antisemitism and Islamophobia, offensive political stickering and attacks on Hindu businesses. National discourse around migration and asylum continues to create local risks, particularly where misinformation or hostile narratives may increase fear among migrant, refugee and minority communities. These issues have not escalated into unrest locally, but they continue to require active monitoring, reassurance and engagement.

The UK national terrorism threat level was raised to SEVERE in April 2026 and Brent experiences complex risks and challenges, including persistent threats from extremist groups.

Risk Scores

Risk Scores	I	L	T	Trend
CURRENT	**5**	**4**	**20**	↔
Previous	5	4	20	
Target	5	3	15	

Key Controls & Mitigating Actions

- Maintain regular community tension monitoring through local engagement, police liaison and partnership arrangements.
- Continuously assess the impact of current initiatives and remain flexible to adapt strategies based on real-time community feedback and emerging challenges.
- Broaden and strengthen community engagement and partnership arrangements to maintain community safety, with a particular focus on tackling extremism, prejudice, hate crime and promoting cohesion. Secure support from community leaders, key organisations, police, the Multi-Faith Forum, school settings.
- Maximise opportunities to apply for additional funding to ensure the sustainability of crucial initiatives, reflecting Brent's community cohesion risks.
- Ensure effective delivery of work to prevent radicalisation and support counter-terrorism responsibilities, overseen by the multi-agency Prevent Oversight Board, chaired at CMT level.

D. Risks to Community Cohesion

♦ Action Plan

Ref	Action	Target Date	Status	Comments
Follow-up of Previous Actions				
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.	Ongoing	In progress	**Strengthening relationships and coordination:** Regular engagement with faith leaders, through the Multi-Faith Forum and other networks supports information sharing, trust and coordinated responses to community concerns. **Tactical support during periods of tension:** Strong relationships with community and faith groups enable the Council to identify and respond to emerging concerns quickly, particularly when international/national events have the potential to create tensions locally due to the borough's diverse population. **Building community resilience:** Ongoing engagement strengthens local connections, promotes cohesion and inclusion, and creates opportunities for dialogue across communities. **Supporting community-led initiatives:** Working with community and faith organisations to deliver activities that bring residents together and strengthen social cohesion.
2.	Deliver Community Cohesion and Hate crime projects by March 2026. These projects are: 1. Community Sports Culture and Cohesion Tournament 2. Hate Crime Schools Programme and 24/7 Third-party reporting line 3. Hate Crime Community Capacity Building Project	March 2026	Complete	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. Hate crime projects reached 1891 individuals in Brent by the time delivery concluded in December 2025. The evaluation evidenced increased willingness to report hate crime among training participants and increased community resilience measured through participants' reported ability to support others.
New Actions – September 2026				
1.	Refresh Brent's community tension monitoring and escalation arrangements to ensure emerging concerns are identified early and addressed proportionately.			
2.	Secure funding and deliver targeted prevention projects to counter anti-migrant hostility with secondary focus on countering emerging hate crime issues.			

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 severe 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 to work with government to achieve the national 2050 target. Brent's Climate & Ecological Emergency Strategy ('Climate Strategy', 2021-2030) was adopted in 2021. In 2024 (the most recent available statistics), 827 kilotons of carbon dioxide were emitted within the Brent boundary (38% from homes; 26% from transport; 16% from the commercial sector; 12% from Industry; and 7% from public sector). Indirect consumption emissions (from the consumption habits of Brent's residents) are estimated to be 3-5 times higher than this, but it is not possible to monitor these. Brent's in boundary carbon emissions have reduced by 48% since 2005, and 18% since 2019. The Brent Local Area Energy Plan Phase 2 report produced by Ramboll in Spring 2026 now recommends 2040 rather than 2030 as the earliest practicable date that carbon neutrality could be reached, at a total whole system cost of £10.5bn, while the cost of achieving this target by 2050 would be £10.6bn. Brent's Climate Strategy is being refreshed this autumn to account for this.

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 in June 2022 and an updated Climate Adaptation and Resilience Framework (CARF) was adopted in January 2026. The CARF sets out how Brent will prepare for the impacts of climate change, focusing on three main climate hazards: flooding, extreme heat, and drought and water shortages. Brent's 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. Globally, the past eleven years (2015-2025) were the warmest on record. In summer 2022, temperatures in London exceeded 40°C for the first time, contributing to an estimated 387 excess deaths across London, while the Harlesden, Church End and Roundwood areas were identified as among Britain's hottest neighbourhoods. In July 2021 there was significant flooding affecting homes, infrastructure, and businesses in Brent.

The council will need to proactively embed climate adaptation and resilience across council business, while responding to 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. 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

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. An updated Climate Strategy and an accompanying 4 year programme are being developed this autumn.
- Our annual 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 £17m to date.
- The Climate Adaptation and Resilience Framework was adopted in January 2026 and is now being implemented, including development of a neighbourhood heat resilience pilot in Harlesden and Stonebridge.
- The council's Severe Weather Plan and associated emergency planning, public health and communications arrangements were tested during a simulation exercise in March 2026 and are being updated accordingly.
- 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				
1.	To implement the 2024-2026 Climate Programme	October 2024 – December 2026	In progress	Ongoing and monitored through quarterly meetings of the Corporate Sustainability Board and Corporate Performance reporting.
2.	To review and benchmark Brent’s carbon emissions from the 2024 DESNZ statistics when these are released in summer 2026.	August 2025	Completed	DESNZ statistics are released and analysed annually each summer.
3.	Completion of West London Local Area Energy Plan Phase 2	April 2026	Completed	LAEP Phase 2 completed by Ramboll, in conjunction with the GLA and West London Boroughs. This is informing a refresh of Brent’s Climate Strategy.
4.	Completion of Neighbourhood Extreme Heat Risk Mapping Study (Stonebridge/Harlesden)	April 2026	Completed	Study completed, identifying a range of potential interventions for Harlesden and Stonebridge and wider principles that could be applied elsewhere in the borough.
5.	Undertake a targeted, intelligence-led community awareness campaign on extreme heat	September 2026	In progress	Targeted communications delivered. Number of cool spaces increased. Two Brent ‘HeatWise’ events delivered to raise of heat-related risks and provide support and advice.
6.	Undertake a cross-departmental / multi-agency simulation exercise on different extreme weather and climate related scenarios in Brent	April 2026	Completed	Simulation exercise completed in March 2026. Lessons learned are informing updates to the Severe Weather Plan and associated procedures.
7.	Undertake a community awareness campaign around Flood risk/SUDs/paving over gardens	April 2026	Not yet started	Comms campaign to be launched Autumn 2026.
8.	Undertake an opportunity mapping study and develop a pipeline of potential locations for Sustainable Urban Draining systems in the borough to help with potential flood risk	April 2026	In progress	Study being undertaken. Findings will identify priority locations for sustainable drainage interventions and support future flood resilience projects.
New Actions – September 2026				
9.	Update Brent’s Climate Strategy and develop a new Climate Programme to run from 2027 to Dec 20230.	Feb 2027	In progress	Engagement and consultation planned for Autumn 2026, report to Cabinet scheduled for Feb 2027.

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

The cyber threat landscape continues to evolve rapidly, with AI increasingly enabling automated attacks and faster vulnerability discovery. Over the last quarter the volume of security patches released by vendors has more than doubled underlining the speed at which new vulnerabilities are emerging.

The Council continues to strengthen its cyber security posture through delivery of a comprehensive Cyber Improvement Plan, recently reviewed and reprioritised to focus on highest risk activities. A business case is being developed to secure additional specialist capacity, ensuring the Council remains resilient as threat volumes and complexity increase. Each month, tens of thousands of potential vulnerabilities and security events are identified through tooling and monitoring, yet the number requiring remediation within the Council's own environment remains low, demonstrating strong preventative controls.

As part of its ongoing commitment to maintaining a robust security capability, the Council is due to renew its 24/7 Security Operations Centre service with NCC Group in October, ensuring continued independent monitoring and specialist support. Furthermore, in March the Council invested in Rubrik Entra ID Protection, which is now fully operational. This addresses a growing trend across the sector, with attackers increasingly targeting identity platforms such as Microsoft Entra ID. Native protection has historically been limited, and this new capability significantly improves resilience, including recovery and recovery assurance for a critical service. There have been no reportable cyber security incidents during this reporting period.

The STS team have undergone Cyber social engineering training after learnings from incidents such as Marks and Spencer's, Jaguar Landrover and Kensington and Chelsea.

The Council continues to demonstrate a strong level of cyber maturity, achieving 97 out of 100 in the LOTI Security Scorecard assessment, the highest among London councils. Despite this positive position, the external threat environment continues to deteriorate. Given the increasing use of AI by threat actors alongside longer-term risks such as quantum computing, the likelihood score has been increased from three to four, reflecting the heightened probability of a significant incident affecting local government, notwithstanding the Council's strong control environment and proactive mitigation activities.

To note: Ciaran Weldon has moved on, and we currently have Alexandra West as our interim CISO. We are currently reviewing the role for our future restructure as a part of Southwark Exit of the shared service.

Risk Scores	I	L	T	Trend
CURRENT	**4**	**4**	**16**	↑
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.
- Investment in an enhanced backup solution.
- Ran ‘Table-Top’ cyber-attack exercises with business services and emergency planning teams, to practice our coordinated response to any attack, with 3 more planned for 2025.
- Cyber Improvement Plan reviewed and reprioritised to focus on the highest-risk areas.
- Business case being developed for additional specialist cyber security capacity and support.
- 24/7 Security Operations Centre (SOC) providing continuous monitoring, detection and specialist incident response.
- NCC Group SOC service due for renewal in October 2026 to maintain continuous cyber monitoring and response capability.
- Rubrik Entra ID Protection procured in March 2026 and now fully operational, providing additional protection and recovery capability for the Council’s identity environment.
- Ongoing monitoring of emerging threats, including the increased use of AI by threat actors and AI-assisted vulnerability discovery.
- Preparatory work to understand and respond to longer-term cyber risks arising from quantum computing.

F. Cyber Attacks

♦ Action Plan

Ref	Action	Target Date	Status	Comments
Follow-up of Previous Actions				
1.	Enhanced training for IT staff within STS and Brent IT teams on phishing and social engineering.	March 2026	Completed	The teams have completed the training
2.	Carry out independent peer reviews of Tier 1 systems.	March 2025	Completed	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.	March 2025	Completed	Our 3rd 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.
New Actions – September 2026				
4.	Creation of a Cyber Service Improvement Plan and take forward priorities	September 2026	Ongoing	
5.	Review of Quantum Computing threats (Phase 1)	October	In progress	
6.	Renew the security operations centre	October	In progress	
7.	Continued resilience testing of key infrastructure	Quarterly	In progress	

G. 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 Scores

Risk Scores	I	L	T	Trend
CURRENT	**5**	**3**	**15**	↔
Previous	5	3	15	
Target	5	2	10	

Risk Update

In February 2026, Council agreed the budget for 2026/27 with a £10.4m package of savings and in July 2026, a £50m gap was identified over the medium-term (£5m in 2027/28; £15m in 2028/29 and £10m in each year from 2029/30 to 2031/32) . This savings requirement is after consideration of the outcome of the Fair Funding Review, which was positive for Brent Council, but was only sufficient to maintain the status quo. The final overspend in 2025/26 was £18.3m on the revenue budget, with most of this pressure recurring into future years. Furthermore, at Q1 of 2026/27, a £9.5m overspend was reported on the revenue budget, concentrated primarily in homelessness and temporary accommodation. The Council is taking a number of mitigating actions, including continuing to implement spending controls and undertaking an exercise to identify achievable in-year savings through actions such as vacancy management and pausing non-essential projects. Any unmitigated overspends will result in a use of unallocated reserves.

The £10m of savings for 2026/27 were identified with cross-cutting themes. This new approach to delivering savings enables the Council to balance the budget in a way that supports transformative change, but it must be acknowledged that delivering these savings will be challenging and non-delivery of savings is a key risk to the 2026/27 budget and the MTFS. At the time of writing, £8.5m of the savings (82%) are on track to be delivered and £1.9m (18%) are considered to be at risk of not being delivered. Of the savings which are expected to be delivered, only £1.5m (14%) have been delivered already. There remains a risk that a greater proportion of the savings will not be delivered, increasing the pressures and putting a strain on the limited resources of the Council.

The ongoing pressures on Brent's revenue budget detailed above necessitate strategic changes to return Brent to a sustainable financial position in the medium-term. Critical to this is the Council's new Integrated Business Planning approach, which aims to better integrate service planning with budgets, risk and performance at all levels of the organisation. This approach will involve tackling the most complex challenges, such as homelessness, through a cross organisational approach. This approach will ensure that the MTFS and Council Plan are more closely aligned, so that resources are aligned to strategic priorities with defined outcomes, while clearly demonstrating value for money. Work on this approach is already underway for the 2027/28 budget setting cycle, involving all Council services, with an expectation that this is a journey towards the ideal state, with a new annual cycle of integrated budget planning fully implemented from April 2027 for the development of the 2028/29 budget.

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.
- In-year savings exercise to reduce pressure on the 2026/27 budget

G. Financial Resilience and Sustainability

♦ Action Plan

Ref	Action	Target Date	Status	Comments
Follow-up of Previous Actions				
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 January
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.	To model budget scenarios for 2027/28 and 2028/29 following the three-year settlement in December 2025	November 2026	In progress	A Medium Term Financial Outlook report was presented to Cabinet in July 2026, following the Council elections in May. This presented a draft £5m budget gap for 2027/28 and £15m for 2028/29. The review of the budget assumptions is ongoing and will be revised ahead of the 2027/28 draft budget in November 2026, in line with the new Integrated Business Planning approach.
New Actions – August 2026				
5.	Services to consider all opportunities to reduce expenditure, including vacancy management, delaying recruitment, reducing discretionary spend, rephasing activity, and pausing non-essential projects or initiatives. To reduce the overspend in 2026/27.	August 2026	In progress	
6.	Services to complete Integrated Business Planning Workbooks, setting out where the services are going in the next three years and a detailed delivery plan for 2027-28.	September 2026	In progress	

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 (January 2026) 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, endorsed by the ILACS inspection in April/May 2026 that judged all areas of Council practice to be 'good'. An updated Practice Improvement Plan is in place to ensure that the service continues to improve. A quarterly Quality Assurance update is provided to senior leaders to understand the quality of practice. The next self-evaluation of practice will be completed in autumn 2026.

There is strong multi agency working, both at an operational level and via revised strategic partnership working arrangements, in line with changes in Working Together. 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 reform programme is in development with the engagement of partners. Changes will be implemented by March 2027 that will include new multi agency child protection arrangements.

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. 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 and step up to social work scheme.

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

Risk Scores	I	L	T	Trend
CURRENT	**4**	**3**	**12**	↔
Previous	4	3	12	
Target	4	3	12	

Key Controls & Mitigating Actions

- Quarterly quality assurance reports about practice and learning supporting a practice improvement plan. Monthly performance reporting to senior leaders.
- Bi-monthly Workforce Development Group chaired by the Corporate Director of CYP to monitor initiatives in the Workforce Development Plan.
- Effective multi-agency safeguarding partnership arrangements in line with 'Working Together' principles.
- 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.

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
Follow-up of Previous Actions				
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.
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	Quarterly returns submitted to DfE. Stakeholder forum in place and meeting monthly
4.	Implementation of the quality assurance programme and learning events	April 2026	Completed	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
8.	Revised panel arrangements to track cases and ensure senior leadership oversight	April 2026	In progress	Implemented in July 2026

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

Between July 2025 and June 2026, 630 permanent and fixed-term appointments were made to Council vacancies, a significant increase in recruitment activity. Of these, 209 were internal appointments, demonstrating good internal progression and retention of talent. The ongoing work of the Resourcing Business Partner service has provided targeted support for hard-to-fill and specialist roles, contributing to successful recruitment campaigns across key services. Recruitment challenges remain across several specialist areas, including Qualified Social Workers, Finance, Housing, Planning, Educational Psychology, Legal, and Engineering and Surveying, reflecting wider local government workforce shortages. While reliance on external search agencies is reducing, specialist recruitment support remains necessary for some roles to secure the required skills and expertise.

Temporary staffing expenditure has continued to reduce, falling from £26.99m in 2023/24 to £18.86m in 2024/25 (30% reduction) and further to £15.34m in 2025/26 (19% reduction). This includes a significant reduction in agency spend within Children's Services. The new Managed Service Provider (MSP) contract successfully commenced in February 2026, improving governance, contract management, value for money and providing access to executive search capability for senior appointments. Of the 421 external appointments made during the year, 69 were existing Brent agency workers moving to council contracts, reducing agency dependency and retaining valuable skills and experience.

Further improvements to recruitment governance and capability have been implemented. A mandatory Hiring Skills for Managers Workshop launched in July 2026, with over 60 managers having completed the training so far to strengthen fair, inclusive and compliant recruitment practices. The revised Recruitment and Selection Policy, incorporating PwC Internal Audit recommendations, will be published in September 2026. The Oracle Internal Marketplace, launched in April 2026, has improved access to internal opportunities, enhanced the employee experience and streamlined recruitment processes. Overall, progress has been made in reducing agency reliance and strengthening permanent recruitment capability, although ongoing workforce pressures remain in specialist job areas.

Risk Scores

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

Key Controls & Mitigating Actions

- Resourcing Business Partners (RBPs) working with key Service Areas provide proactive, targeted support for hard-to-fill and specialist vacancies offering hands-on support to hiring managers and candidates through recruitment process
- New Managed Service Provider contract in place for supply of agency staff to mitigate the risks to services of vacancies while controlling cost and governance
- Executive Search available via MSP to support external recruitment for senior leadership roles.
- New Cost-Effective Interim Worker Category introduced via MSP to strengthen governance over higher-value temporary appointments and reduce costs.

I. Recruitment and Retention

♦ Action Plan

Ref	Action	Target Date	Status	Comments
Follow-up of Previous Actions				
1.	Working with job board providers to maximise the functionality on offer to increase the profile of jobs at Brent	Ongoing	Completed	Implemented automation function so Council vacancies automatically posted on LinkedIn and Jobs Go Public, removing need for manual posting and closure of adverts.
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	Partnering with hiring managers to develop tailored recruitment strategies to address challenges in attracting candidates for specialist and hard-to-fill roles.
3.	Conduct competitive retender of Managed Service Provider contract with Comensura, expires February 2026. Tender process goes live in March 2025 with contract decision made August 2025.	Ongoing	Completed	Tender complete and new MSP contract with Reed went live on 09 February 2026 with minimal disruption to service and improved contract management.
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	Completed	New Cost-Effective Interim Worker Category introduced to strengthen governance over higher-value agency worker assignments.
5.	Produce reports to review metrics and to assess effectiveness of campaigns where social media is being optimised	Ongoing	Completed	Reports produced regularly to assess the effectiveness of campaigns where social media channels are being optimised to improve candidate attraction.
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.	Jan 2027	In Progress	Cross-functional working group (OD, L&D, Recruitment, HR, IT and Oracle) reviewing the end-to-end onboarding process to improve the new starter experience including candidate survey launched June 2026 (Completed). Key recruitment workstreams include a new Welcome to Brent guide, automated keep-in-touch communications for candidates and managers, and improvements to onboarding resources to support engagement, navigation of Council systems and reduce early attrition during probation.
New Actions – September 2026				
7.	Work with Digital Transformation Teams to design, pilot and implement AI-enabled tools to support hiring managers with the longlisting of applications for high-volume recruitment campaigns. Ensure the solution provides fair and consistent candidate assessment, reduces manual administration, improves time-to-hire and while maintaining compliance with equality and recruitment legislation.	Jan 2027	In Progress	
8.	Develop and implement corporate recruitment KPIs and Service Level Agreements (SLAs) for internal and external permanent and fixed-term recruitment. Performance measures covering the recruitment lifecycle, from requisition approval through to candidate start date, enabling consistent monitoring, reporting and accountability.	June 2027	Not Yet Commenced	

J. Emergency Preparedness, Response and Recovery

Risk Details

There is a risk that the Council fails to adequately prepare for, respond to, or recover from a major incident or emergency affecting Brent. This could result in significant impacts on the health, safety and wellbeing of residents, communities, businesses and staff, alongside reputational damage, regulatory non-compliance and ineffective multi-agency response arrangements.

Risk Update

Emergency Planning activities continue to meet the requirements of the Civil Contingencies Act 2004 and are subject to scrutiny through national, regional and internal governance arrangements.

Assurance activity, including an external review in 2023, annual assessments against the Resilience Standards for London (RSLs), the Grenfell Tower Inquiry recommendations, and learning from incidents and exercises, continues to identify opportunities for improvement. These actions support the Council's wider ambition to embed resilience across all services and reinforce that resilience is everyone's responsibility.

The Emergency Planning and Resilience (EP&R) team is fully staffed, with additional capacity provided through a graduate placement. A review of team structures is underway to strengthen leadership, clarify accountability and maximise organisational impact. Recruitment to key volunteer response roles, including Loggists, Local Authority Liaison Officers (LALOs) and Rest Centre staff, has improved, supported by clearer standby arrangements and increased awareness of the Council's response function.

Preparatory work is underway to support compliance with the Terrorism (Protection of Premises) Act (Martyn's Law). This includes reviewing arrangements across Council buildings, identifying required improvements and providing training to relevant officers.

Emerging risks and priorities include the increasing incidence of lithium battery fires and the impacts of climate change. While lithium, battery fires are not currently on the National and London risk register, the EP team have been in discussion with LFB about whether this should be included in the Brent Borough Risk Register. LFB have provided some training for our Resilience Advisors and Emergency Response Officers. Disposal of the batteries after involvement in a fire has been a challenge and further discussions are ongoing with our contractor to agree arrangements. The team asked CSV Brent to include this risk on the Resilience Hub website.

Another area of focus has been Climate Change, following some learning from an exercise in March and the back-to-back Amber and Red Heat Health alerts so far this year, identifying some areas of joint work with the Climate Action team and Public Health.

The Council continues to play an active role in strengthening multi-agency resilience arrangements through the Borough Resilience Forum (BRF) and wider London resilience governance structures. Recent activity has included participation in work to improve the effectiveness of BRFs across London, delivery of a multi-agency exercise based on a large-scale power outage, and a community resilience event that brought together statutory, voluntary, community and faith sector partners. This work has helped identify opportunities to strengthen preparedness, improve partnership working, enhance information-sharing arrangements and ensure resilience planning better reflects the needs of Brent's diverse communities. The continued development of the BRF remains an important element of the Council's wider resilience agenda, helping to strengthen local resilience and preparedness for future emergencies.

Risk Scores	I	L	T	Trend
CURRENT	**4**	**3**	**12**	↔
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
Follow-up of Previous Actions				
1.	Complete implementation of recommendations from external review.	December 2026	In progress	Work ongoing to implement the remaining actions. The majority have been implemented. The restructure of the team will create more focus on BC, which was highlighted in this review.
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.	Ongoing	In progress	Continuing to make progress in this area. Volunteer recruitment has improved due to wider awareness, but in turn supports this action as volunteers are sharing their new understanding of EP&R with colleagues. The Counter Terrorism training is open to all, need to explore other opportunities to open up exercises and training to a wider pool.
3.	Review Governance Structures for EP&R internally.	December 2026	In progress	Drafted Terms of Reference for a Risk and Resilience Group to support this action.
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	Completed	Moved to new risk
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.	December 2026	In progress	Work on going. Current focus is the financial support arrangements.
New Actions – September 2026				
6.	Review the HALO arrangements, to ensure there is 24/7 availability.	December 2026	In progress	Additional HALOs have been identified and booked on to regional training sessions. But changes in existing personnel have delayed progress in getting a rota in place.
7.	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. Safeguarding Incident - Adults

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

Following Dr Adi Cooper's independent review and follow-up evaluation, Adult Social Care implemented a 36-action safeguarding improvement programme focused on strengthening leadership, practice quality, governance, workforce capability and safeguarding pathways. The programme is overseen through the ASC Improvement and Assurance Board and embedded within ongoing service improvement and quality assurance arrangements.

Additional independent assurance was provided in 2026 through a safeguarding practice audit undertaken by Annie Ho. The audit identified strengths in person-centred practice, partnership working and safeguarding outcomes, while also highlighting areas for improvement, particularly around timeliness, consistency of recording, management oversight and progression through safeguarding pathways.

During Quarter 1 to date (18/08/2026), Adult Social Care received 900 safeguarding concerns. Of these, 51% (458) progressed to the Section 42(1) Information Gathering stage, with 22% subsequently progressing to a Section 42(2) safeguarding enquiry. The proportion of concerns not progressing through the safeguarding pathway has reinforced the need for continued scrutiny of threshold decision-making and targeted awareness-raising with partners, providers and internal services to improve referral quality and ensure concerns are directed through the most appropriate pathway.

In response to the independent reviews, Adult Social Care has strengthened governance through the Safeguarding Oversight Forum, Multi-Agency Risk Management (MARM) arrangements, enhanced scrutiny via the Brent Safeguarding Adults Board Performance and Audit Sub-Group, regular safeguarding audits and targeted workforce development. A dedicated Section 42(1) Safeguarding Team has been established to strengthen front-door decision-making and oversight of safeguarding concerns. Work is also underway to review safeguarding processes, forms, templates and Mosaic workflows to improve consistency, reduce duplication and strengthen recording standards and management oversight. Workforce development remains a key priority, with objectives of achieving 90% attendance for role-specific safeguarding training and 100% completion of annual safeguarding refresher training for Safeguarding Adults Managers.

Overall Assurance: Good Assurance. Independent reviews have confirmed that key safeguarding controls and governance arrangements are in place and operating effectively, while identifying areas requiring continued improvement. The actions taken to strengthen oversight, quality assurance, workforce capability and safeguarding processes provide assurance that safeguarding risks are being actively managed and that service improvements continue to be embedded across Adult Social Care.

Risk Scores

Risk Scores	I	L	T	Trend
CURRENT	**4**	**3**	**12**	⟷
Previous	4	3	12	
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'
- The Care Quality Commission (CQC) will be undertaking a local authority assessment of Brent Adult Social Care in September 2026 to assess compliance with Care Act (2014) duties. A key area of enquiry is 'Ensuring safety within the system' including safeguarding.

K. Safeguarding Incident - Adults

♦ Action Plan

Ref	Action	Target Date	Status	Comments
Follow-up of Previous Actions				
1.	“NEED TO KNOW” escalation form and process to be revised and updated within Adult Social Care	January 2025	**Complete**	
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	**Complete**	
3.	Independent Review of progress by Dr Adi Cooper against her original review and recommendations	June 2025	**Complete**	Extended action plan is been drawn up following SA review by Adi Cooper
New Actions – September 2026				
4.	Embed the safeguarding improvement programme, including revised safeguarding pathways, governance arrangements and quality assurance processes.	Ongoing	In Progress	
5.	Complete and implement the review of safeguarding processes, forms, templates and Mosaic workflows to improve consistency, oversight and decision-making.	March 2027	In Progress	
6	Strengthen safeguarding practice through targeted workforce development, audit activity and continuous learning arising from internal and independent reviews.	Ongoing	In Progress	

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 assessment by consultants Caldistons highlighted critical weaknesses, including poor data management, fragmented systems, reliance on unverified figures, weak contractor oversight, inadequate policy framework and an under-resourced compliance team operating reactively.

Recovery is underway against a weekly-reviewed action plan built on the Caldistons findings. The compliance team has been strengthened and True Compliance data rebuilt with Caldistons; since May 2026 it is the primary source for compliance reporting.

Firntech have been appointed to create Building Safety Cases for all high-risk buildings (targeting March 2027; none yet accepted by the BSR) and to complete the outstanding FRAEWs. The Northgate-to-True Compliance migration is running behind its October 2026 target and has been escalated to the governance group with extra resource. Recruitment continues but staff retention remains an ongoing sector-wide problem, and procurement of new compliance contracts is underway, with contractor risk escalated to governance. A new Building Compliance Safety Project Board now oversees progress monthly, with reports and information then shared with CMT and RSH.

Completed to date: resident engagement in high-rise blocks, the True Compliance rebuild, and the new governance reporting cycle.

From September 2026, further actions are agreed: completing FRAEWs, an independent audit of the rebuilt data, verifying all 12,500 previously closed fire risk actions and delivering the Caldistons remedial works to confirm the Council's true position against that assumed at self-referral, a contractor performance framework, a workforce retention strategy, an RSH re-grading submission, and a live FLAGEL compliance dashboard

Risk Scores

Risk Scores	I	L	T	Trend
CURRENT	**5**	**5**	**25**	⟷
Previous	5	5	25	
Target	5	1	5	

Key Controls & Mitigating Actions

- Monthly FLAGEL compliance reporting to DMT.
- Engagement of Health and Safety consultants
- Oversight by BSCPB Periodic reporting,
- Monthly contractor meetings
- 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
Follow-up of Previous Actions				
1.	Rebuild True compliance with Accurate Data	December 2025	Complete	TC rebuild was completed in May 26 and is now used as the primary source for property compliance data, whilst the NEC Project upgrades and implements new modules.
2.	Provide building safety case reports for all high-risk buildings	March 2026	Ongoing	A specialist firm Firntech have been appointed and have commenced the creation of the Building Safety Cases on behalf of the Council. The anticipated completion for the creation of all Building Safety Cases will be by March 2027
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	An action plan has been created and implemented to monitor the progress of the recovery work. The action plan was built on the back of an external audit and a piece of work to establish the root causes for the failures to maintain compliance. The action plan is reviewed weekly to ensure progress is being monitored effectively.
4.	Northgate and True Compliance Integration	October 2026	In progress	Although still in date and progress has been made, it is anticipated that the integration between NEC and True Compliance will be completed after the target date. The action/issue has been escalated to the governing group and is being monitored closely with additional resources being brough in to assist on the project.
5.	Recruit to key posts in the Building Safety structure	October 2025	Ongoing	Whilst some roles have been filled, retaining competent staff is an ongoing problem. There is a shortage of competent staff within the sector resulting in an increased level of staff movement. This will continue to be monitored closely and the utilisation of agency/interim staff will be utilised where necessary.
6.	Develop a new cycle of reporting to ensure full governance	October 2025	Completed	A governance group has been created called the Building Compliance Safety Project Board which oversees the progress of the recovery project on a monthly basis. Progress reports are produced monthly and presented to the project board. The Chair of the project board then reports up to the CMT. The reports presented to the project board are then shared and presented to the RSH, demonstrating transparency and good governance.
7.	Procure Compliance contracts and issue new servicing and surveying programs	March 2026	Ongoing	Along side staff retention, procurement challenges are increasing in risk. The Council needs to be in a position where there is a contract and contractor in place for all of the compliance work streams. The risk associated with this has been escalated to the governance group who are now assisting with addressing the risks and issues.

L. Non-compliance with Statutory Housing Duties

♦ Action Plan - continued

New Actions – September 2026				
8.	Complete FRAEWs for all high-rise blocks	March 2027	In progress	Firntech to carry out the remaining Fire Risk Assessments of External Wall Systems for high-rise blocks, aligned with the Building Safety Case deadline.
9.	Independent data assurance audit of rebuilt True Compliance data	December 2026	Not started	Verify the accuracy of the True Compliance rebuild before it is relied upon for RSH reporting and Building Safety Case submissions.
10.	Verify all 12,500 closed fire risk actions and deliver Caldistons audit remedial works	March 2027	In progress	Verify all 12,500 closed fire risk actions against evidence, deliver the Caldistons audit's remedial works, and confirm the Council's true current compliance position against the position perceived at the point of self-referral to the RSH.
11.	Establish a contractor performance monitoring framework	June 2027	In progress	Introduce KPIs/SLAs for the new compliance contracts once mobilised, to prevent a recurrence of poor contractor oversight.
12.	Building Safety/compliance workforce retention strategy	March 2027	On going	Develop career pathways and pay benchmarking to address the sector-wide shortage of competent staff and reduce turnover.
13.	Prepare RSH re-grading evidence submission	June 2027	On going	Compile an evidence pack once actions 1-3 mature, to formally request the RSH review the current C3 grading.
14.	Roll out a live FLAGEL compliance dashboard to DMT/CMT/Board	December 2026	On going	Convert improved True Compliance data and the new reporting cycle into a standing operational tool rather than static monthly reports.

M. Contract Management

Risk Details

There is a risk that due to operational, commercial, contractual ~~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 has met fortnightly and will continue monthly through 2026. The priorities and progress of this workstream are:

1. Adopt a 4-tier contract segmentation process to review all council contracts to identify how the be managed. *The Local Partnerships model with 7 criteria plus value has been applied to over 90 contracts to segment them into platinum, gold, silver and bronze. It has been tweaked to ensure it is robust and aligned to the council. Directorate Management Teams have been consulted on which of the very highest risk contracts should be determined Platinum. These will have a higher level of scrutiny with a first mitigation report issued to the Assurance Board in Q4 2025/26. A report is due to be presented to the Resources and Public Realm Scrutiny Committee in September which includes focus on strategic contracts.*

2. Clarity of council approach to and policy for contract management with clear roles and responsibilities. The revised Contract Management Framework was launched in May 2026, with a community of practice established to support this, meeting in August. New intranet content has been developed to host new resources, tools and templates

3. Improve the quality, reliability and use of data relating to contracts by establishing a single, central, robust contract database. The TDA and Digital and Data Board have approved and provided capital to fund a contract with Intend to provide a contract management module including contract database/register. This will The platform is currently in implementation and testing ahead of roll out from Q2. This is intended to support the Contract Management Framework in standardising the approach to CM across the whole Council.

4. Improve contract management skills and capabilities across the whole council.17 Council staff have been accepted on the CM Pioneer Programme commencing Apr 2026, developed by the Cabinet Office and the LGA and will reach Practitioner status. The online Foundation training will be a requirement for all contract managers. The programme closes at the end of August.

Together, it is anticipated all the above will improve: the understanding, management and mitigation of contract risks, the capability of contract managers, and performance reporting on high value and high-risk contracts. The presentation of the first assurance report will be a key milestone culminating in reduction in of the risk rating.

Risk Scores

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 4-tier model, in line with Local Partnerships best practice, will determine level of CM, governance and reporting required.
- Improved reporting on the highest risk contracts
- Updated CM Framework to standardise tools, templates and processes across the Council.
- CM supported by new Contracts Register, to contain details of all Council contracts. This will support any data-led exercises looking at CM requirements.
- Improve skills and capabilities in CM through standardised CM Framework and targeted external training.

M. Contract Management

♦ Action Plan

Ref	Action	Target Date	Status	Comments
Follow-up of Previous Actions				
~~1.~~	Undertake further Gateway reviews of contracts due to be procured.	Ongoing	In progress/ Complete	Gateway reviews will continue to be presented to CPCMAB judge the efficiencies to be made: during contract term, for re-procurements and extensions. This is becoming BAU
2.	Further CM training will be provided under the Procurement Improvement Programme through 2025-2027.	April 2026 Completed July 2026	In progress	CMPP to commence for 17 members of staff on April 2026. Accompanied by 16 days of CM consultancy targeted at cost savings
3.	Deliver the CM workstream under the Procurement Improvement Programme – the priorities of which are: 1. Adopt a 3-tier contract segmentation process to review all council contracts to identify how the be managed. 2. Clarity of council approach to and policy for contract management with clear roles and responsibilities. 3. Improve the quality of data relating to contracts and establish one central, robust database. 4. Improve skills and capabilities at managing contracts across the whole council.	March 2027	In progress	1. 90+ contract segmented. Highest risks being defined as Platinum with reports n progress and mitigation to CMT and Assurance Board 2. New Contract Management Framework issued April 2026, supported by clear RACI for all areas of the Council. CMF supported by clear tools, templates and processes to standardise approach across whole Council. 3. New Contract Register for all Council contracts established August 2026. Single source of truth for all contract documentation, supported data requirements. 4. Contract Management Framework, and centralised external training (CM Pioneer Programme) ;ed by central gov, to standardise requirements. Creation of Contract Management Community of Practice scheduled for Q3, to provide internal support and best practice between officers.
New Actions –September 2026				
4.	Use the contract management workstream to establish a community of practice within the council and to disseminate improved ways of working. This will align with the CMPP training	Establish Apr 26 Embedded Sept 26	Planned	Forum planned post results for the CMPP, to discuss learnings, best practice, and how to improve the offering for Brent officers.

N. AI Risks

Risk Details

There is the risk of unauthorised use of generative AI, dependency on third-party platforms, heightened threat of Cyber attacks inadequate cyber security controls, and weak information governance could lead to reputational damage, resident mistrust, operational disruption, data breaches, and regulatory penalties.

Risk Scores	I	L	T	Trend
CURRENT	**3**	**2**	**6**	
Previous	4	3	12	
Target	2	2	4	

Risk Update

Significant progress has been made in strengthening Brent's AI governance maturity during 2025/26 and early 2026/27. The reduction in the risk score from 12 to 6 reflects delivery of the Corporate AI Strategy 2026–2028 and supporting operational controls. Likelihood has reduced through the operational AI Register and active monitoring of shadow and unauthorised AI use. Impact has reduced through established cyber security, data protection and DPIA controls, which support assurance, escalation and mitigation. The AIIA process is available but has not yet been applied, as no qualifying use case has arisen.

The Council has established a comprehensive governance framework comprising the Corporate AI Strategy 2026–2028, AI Governance Framework, AI Governance Board, AI Register accountability arrangements, AI Impact Assessment process and formal escalation routes. These arrangements substantially address Internal Audit recommendations and provide a clear structure for responsible AI adoption, with elements now being operationally embedded.

Clear accountability has been established through the AI and Automation Centre of Excellence, with the AI Governance Board established to provide strategic oversight and senior accountability assigned to the Director of Communications, Insight, and Innovation. Service areas retain accountability for operational adoption and benefits realisation.

The Council has also strengthened assurance through AI Impact Assessments, DPIAs, cyber assurance, shadow AI monitoring, risk tiering and AI Register controls. Procurement due diligence and supplier assurance requirements have been established within the wider AI governance model, with operational integration into procurement processes pending.

While governance maturity has improved significantly, the risk remains active due to continued growth in AI adoption, evolving regulatory requirements, supplier dependency, workforce capability needs and emerging cyber security threats. The current focus is therefore on completing mobilisation, embedding the established controls and monitoring their effectiveness across the organisation.

▪ Key Controls & Mitigating Actions

Corporate AI Strategy 2026-2028 and AI Governance Framework approved and being embedded, defining strategic direction, decision rights, and accountability.

- AI Governance Board established to provide strategic oversight, assurance and escalation; full membership is being finalised before formal oversight begins.
- AI Governance and Accountability Matrix clarifies organisational roles and reduces overlap.
- Corporate AI risk monitored through established risk management arrangements.
- AI Register maintained by the AI & Automation Centre of Excellence, under the operational responsibility of the Digital Programme Manager for AI and Automation.
- Risk-tiered review and escalation applied to AI use cases, supported by AIIAs, DPIAs and Equality Impact Assessments where appropriate.
- Shadow AI monitoring identifies and manages unauthorised use.
- Cyber, information governance, data protection and security assurance integrated into AI approval processes.
- Risk-based AI literacy programme established for staff, managers, and specialist users.
- Copilot Centre of Excellence, enablement, champion networks, and communities of practice support safe adoption.
- AI-specific supplier due diligence and requirements established, covering transparency, governance, human oversight, and contractual controls; operational integration into procurement processes is pending.

N. AI Risks

♦ Action Plan

Ref	Action	Target Date	Status	Comments
1.	We will Develop AI Strategy & Policy Framework	31 July 2026	Complete	Corporate AI Strategy 2026-2028 approved and issued in July 2026, establishing the Council's AI vision, operating model, governance arrangements, risk management approach and strategic implementation roadmap. Supporting governance documentation has also been developed, including the AI Governance Framework.
2.	We will Strengthen governance structures and KPIs	30 September 2026	In Progress	The AI and Data Board and Data Ethics Board have been consolidated into a single AI Governance Board. Its remit and balanced scorecard are established, with full membership and formal reporting arrangements being finalised before oversight begins.
3.	Introduce risk based, Responsible and Ethical AI training for Brent Staff	31 March 2027	In Progress	The Corporate AI Strategy establishes a tiered AI literacy and workforce capability model aligned to organisational risk. Foundational awareness, management capability and specialist training requirements have been defined, and rollout has commenced. Delivery and embedding will continue throughout 2026/27, with participation and effectiveness monitored.
4	Update procurement & supplier due diligence	30 September 2026	In Progress	AI-specific procurement, supplier assurance and due diligence requirements have been established through the Corporate AI Strategy, covering transparency, model governance, human oversight, data protection, cyber security and contractual safeguards. Operational integration into procurement processes is pending.
5	Identify AI vendors appropriate to our tooling strategy and explore internal AI capability	31 March 2027 (Quarterly Review)	In progress	Brent's AI tooling strategy has been formalised through approved platform choices including Microsoft Azure, Microsoft 365 Copilot and UiPath as core strategic platforms. The strategy explicitly prioritises development of internal capability through the AI & Automation CoE and minimises dependency on external suppliers.
6	Embed and Monitor AI Governance Framework	31 March 2027	In Progress	Following approval of the Corporate AI Strategy, AI Governance Framework and associated control documentation, this new action focuses on embedding governance arrangements across services during 2026/27. Progress will be monitored through AI Register coverage, completion of required assurance assessments, management of compliance exceptions, workforce capability measures and evidence of benefits realisation. The action is owned by the Digital Programme Manager for AI and Automation.

O. Business Continuity

Risk Details

There is a risk that the Council is unable to maintain or recover critical services within acceptable timeframes following a disruptive event, resulting in harm to residents, failure to meet statutory obligations, financial loss, service backlogs and reputational damage.

Risk Update

Business Continuity remains a key priority, informed by the Council's self-assessment against the Resilience Standards for London, findings from the 2023 external assurance review, and learning from incidents, exercises and disruptions affecting local authorities across London. Particular focus has been given to strengthening resilience against cyber incidents, severe weather, utility failures, supply chain disruption and workforce pressures.

During the year, Business Continuity Plan (BCP) templates have been enhanced to improve usability and strengthen consideration of supplier dependencies and supply chain risks. Services have undertaken annual reviews of their plans, updated contact information and completed local exercising activities to test arrangements. While the majority of services have completed this process, targeted support continues to be provided to ensure all plans are reviewed and approved.

As part of a wider review of the Emergency Planning and Resilience Team structure, proposals are being developed to create greater organisational focus on business continuity and resilience. This reflects recommendations arising from the 2023 external review and will strengthen strategic leadership, assurance and oversight of business continuity, organisational resilience and preparedness activities across the Council.

A corporate review of submitted plans is being undertaken to improve consistency, identify good practice and provide greater assurance regarding organisational preparedness. Early findings from plan reviews, exercises and discussions with services suggest that, whilst arrangements are in place across the Council, some plans do not yet fully reflect the scale, duration and potential impacts of major disruptions such as cyber-attacks, utility failures and severe weather events. This highlights the need to strengthen organisational understanding of business continuity risks and ensure planning assumptions are informed by lessons from recent incidents affecting other local authorities. The review includes work with Shared Technology Services to assess recovery objectives for critical IT systems and ensure service expectations are aligned with technical recovery capabilities.

Recent exercises and real-world incidents have highlighted the importance of planning for prolonged disruption, particularly in relation to cyber-attacks and extreme weather events. Learning from Exercise Sentinel, a London-wide cyber exercise, and the Tri-Borough cyber incident has reinforced the need for services to be able to operate under constrained conditions for extended periods, maintain support for vulnerable residents and manage significant service backlogs. Learning from climate change and heatwave exercises has also prompted further consideration of climate-related risks within business continuity planning. Opportunities are also being explored to strengthen assurance arrangements through closer collaboration with Internal Audit.

Risk Scores	I	L	T	Trend
CURRENT	**4**	**4**	**16**	
Previous	–	–	–	
Target	3	3	9	

Key Controls & Mitigating Actions

- Business Continuity plans in place covering all departments / service areas.
- Master BIA
- IT disaster recovery arrangements
- Critical Supplier and Third-Party resilience arrangements
- Multi-agency and internal training and exercise programme in place. – including off the shelf exercises.
- On-call arrangements are in place.
- London Standardisation
- 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.
- Zurich BC Review – April 2026

O. Business Continuity

♦ Action Plan

Ref	Action	Target Date	Status	Comments
Follow-up of Previous Actions – March 2025 (from previous combined risk)				
1.	Complete implementation of recommendations from external review.	December 2026	In progress	Work ongoing to implement the remaining actions. The majority have been implemented. The restructure of the team will create more focus on BC, which was highlighted in this review.
2.	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	Completed	Revised templated used as part of 2025 and 2026 BC plan update.
New Actions – September 2026				
3.	Deliver session at SLT and DMTs focused on status of plans, scale of potential disruptions and priority ratings, to ensure there is corporate awareness.	October 2026		
4.	Implement Zurich review actions	March 2027		
5.	Complete 2026 master BIA and align IT requirements with STS / ICT disaster recovery plans.	December 2026		
6.	EP&R to deliver exercises for priority 1 services to improve the quality of these plans.	December 2027		