

Report to Audit and Risk Assurance Committee

20 February 2025

Subject:	Housing Improvement and Transformation Plan – Risk Register
Director:	Executive Director, Place Alan Lunt
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1 Recommendations

- 1.1 To consider and comment upon the Housing Improvement and Transformation Plan Risk Register.

2 Reasons for Recommendations

- 2.1 The Audit and Risk Assurance Committee considered the Housing Improvement and Transformation Plan at its meeting of September 18, 2024. A request was made for the associated risk register to be presented to a future meeting. Following further engagement with the Regulator of Social Housing (RSH), the Plan and associated risk register have been subject to review. The appended register reflects the current range of risks and means of mitigation.

3 How does this deliver objectives of the Council Plan?

Living in Sandwell	The provision of high-quality affordable housing is critical to the wellbeing of Sandwell’s communities. Ensuring effective delivery of the Housing Improvement & Transformation Plan and mitigating the risk of failing
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	to deliver the plan, are central in ensuring the quality of the housing provided.
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4 Context and Key Issues

- 4.1 During 2022, evidence came to light that the Council was failing to comply with the regulatory requirements for social housing in relation to the Consumer Standards Framework. As a result, the Council 'self-reported' the failure to the Regulator of Social Housing (RSH).
- 4.2 Responsive engagement with the Council began during June 2024, following information provided by the council as part of Sandwell MBC's Tenant Satisfaction Measure (TSM) return. Elements of the return were flagged as indicative of a failure to deliver the outcomes of the Safety and Quality Standard.
- 4.3 During October 2024, the RSH issued a 'C3' Regulatory Judgement (RJ) to the council indicating that there are serious failings in the landlord delivering the outcomes of the consumer standards and significant improvement is needed. Specifically, 4 areas were of concern.
- Asbestos management surveys or re-inspections had been carried out on only around 2% of relevant buildings. (target 100%)
 - Although electrical safety inspections had been completed for 96% of its homes, the Council is unable to monitor or report on the completion of remedial actions arising from those inspections.
 - The Council reported more than 14,000 overdue repairs, with over 90% of these yet to be assigned for completion.
 - The Safety and Quality Standard requires the council to have an accurate, up to date and evidenced understanding of the condition of their homes that reliably informs their provision of good quality, well maintained and safe homes for tenants. The Council reported that while it intended to carry out a comprehensive (100%) stock condition evaluation of its housing stock, only 5% of surveys were at the time completed.
- 4.4 The Council was by this time, developing a comprehensive Housing Improvement and Transformation Plan, seeking not only to become compliant with building safety requirements as identified by the RSH in their C3 Regulatory Judgement, but to deliver a broad range of transformative improvements across the housing service. The draft plan

was presented to this Committee at its meeting of September 2024. Committee requested sight of the risk register that accompanied the plan.

4.5 The plan and risk register have since been enhanced, reflecting a range of areas where improvements in the way services are delivered had been identified previously. The risk register appended to this report reflects the key risks that exist in relation to the current plan. As work progresses to implement and complete workstreams, risks will change and thus the register will be the subject of regular review throughout the life of the Improvement and Transformation Plan.

4.6 The risk register comprises 15 key risks, classified as Amber (6) and red (9). However, following mitigation, 3 risks remain amber and 1 remains red, as set out below.

Risk 4 Failure to put in place appropriate processes and controls to ensure compliance with Building Safety regulations (Amber, score 9)

Risk 9 An increase in demand for homeless advice and assistance and in turn an increase in demand and need for temporary accommodation (Amber, score 9)

Risk 10 Failure to set and collect rent at levels which support the delivery of services will impact on short-, medium- and long-term service plans (Amber, score 8)

Risk 12 Failure to replace stock sold under the Right to Buy and to maximise the supply and nomination rights to affordable housing will increase the risk of homelessness (Red, Score 12)

5 Implications

Resources:	The Plan and associated risk register have been developed with reference to the available resource and the priorities of the council as a housing provider to ensure building safety and to comply with the formal requirements / obligations of the Regulatory Framework for social housing.
Legal and Governance:	The plan and risk register are focussed on ensuring that the council undertakes its role as landlord in a way which is compliant with the Regulatory Framework for social housing and the need to achieve

	/ maintain properties according to the 'decent homes' standard
Risk:	The appended risk register sets out the key risks relating to delivery of the Housing Improvement and Transformation Plan and the means of mitigating the risks identified.
Equality:	None as a direct result of this report
Health and Wellbeing:	The condition of the council's dwelling stock and its effective management and maintenance will play a key role in ensuring the health and wellbeing of our tenants.
Social Value:	None as a direct result of this report.
Climate Change:	None as a direct result of this report.
Corporate Parenting:	None as a direct result of this report

6 Appendices

Appendix 1 - Housing Improvement and Transformation Plan Risk Register.

7. Background Papers

Housing Improvement and Transformation Plan.