

Housing Transformation & Improvement Risk Register

Ref	Risk Title and Description	Risk Owner	Service/ Workstream Area	Current Measures in Place to Manage Risk	Current Risk Score			What else do we need to do / Further actions required to manage the Risk	Responsibility for Action	Date for completion of Action(s)	Target Risk Score			Programme project	Comments
					Likelihood	Impact	Total				Likelihood	Impact	Total		
1	<p>Procurement and Contract Management</p> <p>Contracts have been previously let with ineffective controls to effectively manage the contracts. This can lead to the failure of incumbent contractors performing to deliver the required outcomes.</p> <p>The repairs backlog consists of a wide variety of work of finite number. The broad range of work with the limited number may lead to little interest in the market to deliver within the proposed timeframes. This could affect the completion of the backlog works and create problems with the new works increasing the size of the backlog.</p>	AD of Asset Management	Best use of resources / VM	<p>Procurement and supplier management oversight board (PSMOB) meets monthly to have oversight of contractor performance.</p> <p>KPI are utilised where available and have been built into any new contracts to ensure there are robust means of contract management.</p> <p>Frameworks have been explored to ensure that there are appropriate contracts will and available to carry out the backlog works.</p> <p>Asset management member sit on the Procurement Oversight Board to make sure contracts are in the corporate pipeline.</p> <p>Monthly meeting with Corporate partners to review corporate procuring pipeline in conjunction with Asset management Commercial team</p> <p>Commercial team have more involvement with all contract lets through Asset management to provide oversight</p> <p>Monthly meetings with Asset Management Heads and managers to review corporate pipeline.</p> <p>Proactively assess the market to ensure all routes to market are considered to maximise opportunities and deliver vfm</p>	3	4	12	<p>- Commercial Team to partner with Capital and Repairs teams to produce a suite of Contracts fit for purpose. This will include using information from stock condition surveys and full stakeholder engagement between all asset management managers to produce contracts, capturing the full set of KPI's</p> <p>- Documentation to be kept in one accessible location, with a review process in place to monitor future changes required, (on going through 24/25)</p> <p>- Asset Management commercial team producing monthly monitoring files capturing all spend data against contracts and cost centres to inform all budget holders and managers of current spend situation, including a localised file of all contracts split between Capital and Revenue giving a total value of spend from contracts each financial year.</p>	Head of Strategic Partnerships	31/03/2025 31/12/2025 31/12/2025	2 3 8	3 3 6	Contract Process Review	Full set of new Contracts with Review monitoring will be part natural new contract let and using Stock condition surveys to re-visit and re-work for future contract let. Will take over 12 months to complete. Contract spend Monitoring and Pipeline work will be completed by Dec/Jan.	
2	<p>Asset Management Budget</p> <p>Failure of the allocated budget to accommodate the additional costs identified to deliver the transformation and improvements for both the Quality and Safety Consumer Standard and the capital costs to deliver new IT systems.</p>	AD of Asset Management	Best use of resources / VM	<p>Capital re-profiling has been carried out to re-prioritise commitments.</p> <p>Staffing establishments have been realigned to accommodate additional roles for building safety and compliance.</p> <p>Capitalisation of costs have been reviewed to ensure correct financing mechanisms are utilised for both 'repairs' and voids.</p> <p>Procurement and supplier management oversight board (PSMOB) meets monthly to have oversight of contractor performance in line with budget approvals.</p> <p>Monthly meetings are chaired by Asset Management with finance to review in month spend across both revenue and capital.</p>	4	4	16	<p>- Repairs policy developed and review of service standards to reset expectation of the repairs service having a long term reduction in the revenue pressures.</p> <p>- The defined backlog to be contracted out to allow current resource to manage the throughput of works</p> <p>- Accurate budget profiling set for future years - based on data and known future expenditure.</p> <p>- Maximise borrowing capacity for capitalisation of elements.</p> <p>- Understanding the stock condition to have a planned programme of investment having a long term reduction on responsive repairs.</p>	Head of Repairs / Head of Capital	01/06/2025 31/06/2025 01/12/2024 01/04/2025 12/12/2026	2 2 2 2 4	2 2 2 2 4	Best Use of resources and stock (Value for Money), Repairs Review & Backlog Improvement Plan Capital Improvement Plan		
3	<p>HRA Business Plan</p> <p>Failure to have a long term (30 year) business plan in place for its housing revenue account, developed with input from tenant and leaseholders, will result in an ineffective allocation of limited resources and failure to achieve the Council's long term housing ambitions and priorities.</p>	AD of Housing Management AD of Asset Management	Best use of resources / VM	<p>Assumptions on element life expectancy are valid</p> <p>Plan approved by Cabinet 15/2/23.HRA officer group in place with terms of reference re oversight of HRA.</p> <p>HRA budget monitoring ongoing</p> <p>Annual review of rent and service charges</p> <p>Annual Report for tenants published for transparency of performance and spend.</p> <p>Savills have been engaged with finance to provide third party review.</p> <p>HRA Business Plan to be reviewed at least every 3 years and sooner where affected by policy changes.</p> <p>Rent and service charge increases approved at for Cabinet Dec 2023</p>	3	4	12	<p>- Compile good stock Condition data</p> <p>- Employ AM system and resources to populate with all known data capable of producing long term planning</p> <p>- Review all assumptions on element life expectancy are valid</p>	AD of Housing Management AD of Asset Management	31/12/2026 31/12/2026 31/03/2025	2 2 4	2 2 4	Best Use of resources and stock (Value for Money),		
4	<p>Building Safety</p> <p>Failure to put in place appropriate processes and controls to ensure compliance with Building Safety regulations and guidance, then this could result in:</p> <ul style="list-style-type: none"> - A risk of injury and even death to tenants, leaseholders and members of the public - Reputational harm - Exposure to regulatory action including corporate manslaughter and financial penalties to Council - The triggering of investigations and sanctions by the Building Safety Regulator and/or Regulator of Social Housing - Risk of individuals being prosecuted as well as the council itself 	AD of Asset Management	Good quality, safe and affordable homes	<p>Restructure is agreed to provide capacity within the team</p> <p>Interim Building Safety and Compliance Head post in place.</p> <p>Consultant review of draft SSC reports</p> <p>Pennington Choices engaged as critical friend</p> <p>Compliance Policy approved at Cabinet</p> <p>KPI templates in place and monitored at Senior levels within SMBC</p>	3	4	12	<p>- Training matrix to be developed and a programme of training to be initiated to ensure staff are competent.</p> <p>- Credible SMBC managed Asset/Compliance system required to hold all Compliance and Building Safety information in electronic form.</p>	Head of Building Safety and Compliance	01/09/2025 01/06/2025	3 3	3 3	Compliance & Building Safety Improvement Plan		
5	<p>Fire Safety</p> <p>Failure to put in place appropriate processes and controls to ensure compliance with Fire Safety regulations and guidance, then this could result in:</p> <ul style="list-style-type: none"> - A risk of injury and even death to tenants, leaseholders and members of the public - Reputational harm - Exposure to regulatory action including corporate manslaughter and financial penalties to Council - The triggering of investigations and sanctions by the Building Safety Regulator and/or Regulator of Social Housing - Risk of individuals being prosecuted as well as the council itself 	AD of Asset Management	Good quality, safe and affordable homes	<p>FRA for all buildings with communal parts to be in place</p> <p>FRAs to be in date matching SMBC Policy for review periods</p> <p>Fire Doors including all Flat Entrance doors to be regularly inspected as per FSE 22 regs</p>	3	3	9	<p>- Continue with plan to review all out of date FRA's by March 2025</p> <p>- Continue with plan to employ a contractor to carry our Fire Door inspections in year 1 then insource to new BSM roles in Year 2 onwards</p>	Head of Building Safety and Compliance	31/03/2025 31/06/2025	2 2	2 2	Compliance & Building Safety Improvement Plan		
6	<p>Awabbs Law</p> <p>Failure to adhere to new legislation ensuring homes are safe to occupy in light of the pending Awabbs law, whereby there are likely to be prescribed time periods in which to deal with HHSRS hazards</p>	AD of Asset Management	Good quality services	<p>Adjustments to the current JM system to improve recording on Cat 1 HHSRS hazards. Damp register in Job Manager allow us to have sight on all properties affected by D&M. PW's completed 3 months after works completed to ensure remedies have worked correctly, if not process begins again to eliminate any risk. Decency grant works completed Nov 2024 has concluded works on 625 properties to remove Cat1 Hazards.</p> <p>Smart technology has been installed to the most severely affected properties - allowing automatic trigger points showing us</p>	3	3	9	<p>- Dedicated D&M / HDR team to be setup in Repairs to ensure resources are available to inspect/complete works in line with Awabbs law when introduced.</p> <p>- Closer working with Capital team to highlight properties requiring essential upgrades i.e insulation/new heating systems etc. Procurement of small contract to eradicate excess D&M work identified, jobs increased considerably after 1000+ inspections carried out over two months, to allow DLO to complete new works received.</p>	Head of Repairs	31/06/2025 31/08/2025	2 2	2 2	Repairs Review & Backlog	Managing risks will decrease the amount of Emergency/Urgent works incoming linked to D&M. HDR Claims will decrease along with financial costs to SMBC.	

7	Stock Valuation Failure to adhere to safe practices resulting in high level of disrepair claims and related compensation.	AD of Asset Management	Best use of resources / VM	Repairs process should keep the stock in good state of repairs - mitigating against disrepair claims. Rolling programme of Stock condition surveys should identify any investment needs in the stock in a strategic approach to understand any long term investment needs. The rolling programme will be risk rated to ensure that those at a higher risk, due to the time since last investment or other mitigating factors are taken into account	3	3	9	Options appraisal process to be developed to ensure that vfm is implemented when investing in the stock	Head of Repairs / Head of Capital	30/12/26	2	2	4	Capital Improvement Plan
8	Health and Safety and Compliance Failure to adhere to H&S requirements and ensure the staff have the right tools to safety carry out their role.	AD of Asset Management	Good quality, safe and affordable homes	Occupational health monitoring, Briefing notes, Toolbox Talks and awareness sessions. Previous training now outdated. Quality tool procurement, new Asset Procedures. Tool records for trigger time on tools. Engaged with critical friend to support Ongoing contracts with third party auditors. Ongoing engagement with HSE	3	4	12	- HAVS live monitoring, checking via supervisors tools in use, control of tools used for some trades with larger tools - New Training in progress to be sorted by L&D & H&S. - Discussions being undertaken to use a function in JM to make HAVS recording for each job mandatory for trade operatives. This will give us live results and allow trigger times to be monitored and intervene where required.	Head of Building Safety and Compliance	30/04/2025 30/04/2025 30/04/2025	2	3	8	Compliance & Building Safety Improvement Plan
9	Homelessness & Temporary Accommodation An increase in demand for homeless advice and assistance and in turn an increase in demand and need for temporary accommodation	AD Housing Management	Access to Good Quality Services; Sustainable Tenancies and Thriving Communities.	Homelessness and Rough Sleeper Strategy revised in 2022. Service Operating model focuses on early intervention and prevention. Range of interventions in place to prevent homelessness from the private rented sector. Procurement of new contract for Temporary Accommodation delivered in 2023 in addition to increasing the size of own stock provision. Plans to convert Holly Grange from single person TA to family TA completed. Needs Assessment and Procurement of new Supported Housing Contracts completed	4	4	16	Additional procurement of interim accommodation to reflect long-term TA placements Private Rented Sector - rent top ups to prevent homeless presentations where there is an affordability gap and risk of homelessness. Additional Homeless Prevention Grant from April 2025	Heads of Housing Solutions	Canvassing - ongoing Procurement - Q4 (24/25)	3	3	9	Customer Journey & Consumers Standards Improvement Plan
10	Housing Rental Income Failure to set and collect rent at levels which support the delivery of services will impact on short, medium and long term service plans.	AD Housing Management	Access to Good Quality Services; Sustainable Tenancies and Thriving Communities.	Internal Audit in 2023 identified no significant risks. Performance Management framework in place to monitor rent collection. UC Roadshows run across 2023 and 2024 to prepare new claimants migrating from legacy benefits. Use of Mobysoft Rent Sense software to predict payment patterns and prevent arrears. Well-resourced Welfare Rights and Money Advice team. Hardship Fund available to support tenants impacted by cost of living. Regular write-off of bad debt.	2	4	9	Further enhancements required to rent systems to provide better customer choice for payment of rent by DD. New software to be implemented to automate processes related to UC migration to provide more capacity for customer engagement and support.	Heads of Income and Money Advice	Q4	2	4	8	Best use of resources and stock (VFM)
11	Compliance with the Housing Regulator set Consumer Standards for social housing Failure to adhere to the outcomes prescribed in the consumer standards may lead to regulatory intervention and or fines.	AD of Housing Management AD of Asset Management	Good Quality Homes; Safe Homes; Access to Good Quality Services; Sustainable Tenancies and Thriving Communities	Tenant Satisfaction Survey undertaken in October 24, Annual Report and Tenants Annual Conference each summer. Tenant Engagement Framework in Place, dedicated Tenant Engagement Project Officers in place to increase participation of tenants with support of the wider Neighbourhood Partnership Team. New Housing Resolution Team in place from April 24 to deliver a step change in handling of complaints. Implementation of Tenant & Leaseholder Engagement Strategies for High Risk Buildings from April 24. Self assessment against the the consumer standards completed with external consultancy support Responsive engagement with RSH and C3 regulatory judgement issued in October 2024	3	4	12	- Continued engagement with RSH - Implement actions and recommendations from outcome of self-assessment - Implement actions in the Housing Improvement Plan	AD of Housing Management AD of Asset Management	Ongoing 31/12/2025 31/12/2026	2	2	4	Customer Journey & Consumers Standards Improvement Plan
12	Affordable Housing Options 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	AD Housing Management	Affordable Homes	Nominations Agreements in place with Housing Associations operating in the Borough. Best Use of Stock Taskforce in place to maximise use of own stock. Programme of New Build and Acquisitions in place and monitored through the housing governance structure to ensure 1-4-1 receipts are spent. Capital Grant funding (LAHF) drawn down from DHLUC to acquire properties to address pressures from Afghan Resettlement Schemes. New software implemented to automate processes related to UC migration to provide more capacity for customer engagement and support.	4	4	16	Options appraisal on development of a social lettings agency to be completed by April 2025	Heads of Housing Solutions	Q3 (24/25)	3	4	12	Best Use of resources and stock (VFM)
13	Management of Private Finance Initiative (PFI) and Tenant Management Organisations (TMOs) Failure to have effective governance and contract management to monitor outcomes of management arrangements will risk quality of service provision and adherence to regulator standards	AD Housing Management	Access to Good Quality Services; Sustainable Tenancies and Thriving Communities.	Contract management and monitoring in place for the PFI project. Service Agreements in place for TMOs. Rolling programme of audits of PFI contract by internal audit.	3	3	9	Review of monitoring arrangements to ensure compliance with requirements of the building safety and housing regulator. PFI contract exit plan to be developed. One TMO under scrutiny for potential breaches of management agreement. Management Agreements for both TMOs to be reviewed and refreshed.	Contract Manager	Q4 (24/25)	2	3	9	Customer Journey & Consumers Standards Improvement Plan
14	Systems Implementation Failure to secure sufficient resources to deliver implementation activities across incoming housing systems will risk timely implementation and the meeting of housing regulator obligations required as a result of regulatory notices.	Housing Transformation Lead	Best use of resources / VM	Project cost forecasts under constant review and updated once more detailed information is available. People resource requirements reported to Project Board in advance, to ensure that suitable arrangements are made to secure internal / external support for implementation and preparation activity.	3	4	12	- Compilation of clear cost profiling for future housing IT systems to be developed, and shared appropriately, as cost information becomes clearer during procurement activity. - Compilation of a detailed resource and project structure plan is to be completed by end of February 2025. This will propose a structured approach to the preparation and implementation work required for successful operation of future housing IT systems.	MT / Project Board	31/06/2025 31/02/2025	2	3	8	IT / Systems Transformation
15	Workforce Capacity and C+B&B capability Failure to have a competent and agile workforce to adapt to the transformation and changes required to transform the service. This includes the ability to attract senior members of the team and the pay rate offered by SM&C (e.g. Head of Building Safety and Compliance) and over reliance on interim resource at a higher cost and lack of consistency.	AD of Housing Management AD of Asset Management	Best use of resources / VM	Workforce strategy in development. Internal updates provided to staff through regular huddle sessions JD and PS reviewed for all of asset management to provide assurance on role and pay with equivalent benchmarking. Interim resources are in post (although this has additional risk in relation to cost, continuity of service and is a short term solution)	3	3	9	- Develop a training matrix to highlight competencies required and skills gaps to ensure training courses are available to ensure staff are competent to to the roles required. - Communications plan to engage workforce - Attempt to recruit to permanent Heads of post, acknowledging that the salary is low as per benchmarking exercise - work with HR to see any opportunities regarding recruitment and remuneration	L&D Corporate Comms HR Business Partner	31/12/2025+K8 01/08/2025 31/03/2025	2	3	8	Workforce Development / Resource Management / Culture Change