

Audit and Risk Committee

4 March 2024

Report title	Strategic Risk Register – City Housing Risk	
Accountable director	John Roseblade, Resident Services	
Originating service	Audit	
Accountable employee	Jenny Lewington	Deputy Director City Housing
	Tel	01902 554845
	Email	jenny.lewington@wolverhampton.gov.uk
Report to be/has been considered by	Not applicable	

Recommendations for noting:

The Audit and Risk Committee is asked to note:

1. The update on the City Housing strategic risks which was called in by the Audit and Risk Committee on 22 January 2024.

1.0 Purpose

- 1.1 To update members of the Audit and Risk Committee of the key strategic risks faced by the Council and how it can gain assurance that these risks are being mitigated.

2.0 Background

- 1.1 The Council is no different to any organisation and will always face risks in achieving its objectives and priorities. Sound risk management can be seen as the clear identification and management of such risks to an acceptable level.
- 1.2 The Cabinet remain the owners of the strategic risk register, with the Audit and Risk Committee maintaining oversight of, and providing an independent level of assurance on the adequacy of the risk management processes that underpin it. The latest strategic risk register was presented to Cabinet on 15 November 2023 as part of the Performance and Budget Monitoring Report for 2023-2024.
- 1.3 Whilst the strategic risk register does not include all the risks that the Council faces. It represents the most significant risks that could potentially impact on the achievement of the Council's corporate priorities. Other risks are captured within directorate, programme, project or partnership risk registers in line with the Council's corporate risk management framework.
- 1.4 At its January 2024 meeting, the Committee requested further information regarding the City Housing strategic risks. The risk owner has provided the following further information on this and will also be attending the meeting to discuss the risks in more detail.

Risk 09 – Housing Regulator (Damp and Mould)

- 1.5 There is a risk that the Council fails to address damp, mould and condensation (DMC) issues in properties, which could lead to the death of a resident in the city.

Context:

- 1.6 The presence of DMC in our homes can create a hazard to the health of its occupants, as highlighted following the inquest into the death of Awaab Ishak in Rochdale.
- 1.7 Ongoing media reports exposing the prevalence of mould in social housing across the country also creates a reputational risk for the City Council and our housing managing agents (Bushbury Hill EMB, Dovecotes TMO, New Park Village TMC and Wolverhampton Homes), with the number of DMC related service requests increasing significantly since November 2022.
- 1.8 In Council housing, customers are continuing to report instances of DMC. While this is a positive step that our promotion with customers seems to be encouraging reports, this continues to place significant pressure on resources. The accelerated trend we experienced from November 2022 has continued through winter 23/24.
- 1.9 Within the private sector, the Private Sector Housing Team (PSHT) have historically had high numbers of complaints from residents concerned about damp and mould growth, forming approximately 50% of all complaints. As seen in the social housing sector, PSHT have seen an increase in the reporting of damp and mould since November 2022.
- 1.10 Condensation can be caused by structural matters; lack of insulation, ineffective heating, draughts or other moisture producing damp defects. Condensation can also be increased through occupancy factors; overcrowding, inappropriate clothes drying, poor control over ventilation, lack of heating. The mould growth is a very emotive issue for landlords and tenants and PSHT look to delicately investigate the cause and advise either the landlord or tenant depending on the likely cause of the issue. There is a significant lack of understanding of condensation making resolving it very challenging for PSHT.

What are other Local Authorities and Social Landlords doing?

- 1.11 Local Authorities and other social landlords have responded to the increase in reports of damp, mould and condensation and the risks associated with DMC in a number of ways:
- Review policies and procedures relating to DMC.
 - Providing additional training to staff.
 - Increasing staff resources and creating new teams to target and deal with the causes and effects of DMC.
 - Changing stock condition survey programmes; increasing the number of surveys, moving to a rolling programme of surveys and proactively checking the condition of

homes between surveys, through tenancy audits and asking staff to look for signs of DMC when visiting tenants in their homes, carrying out gas safety checks etc.

- Updating IT systems and the data recorded about both the home and the people who live in it.
- Improving the quality of data about tenants, in particular household make up, health issues, disabilities, communication needs or preferences and any vulnerabilities.
- Accessing funding for thermal improvements/decarbonisation work to homes.

Current activity we are taking to mitigate the risk:

Council Housing

- 1.12 Council owned housing stock is managed by four managing agents. Contract management of these organisations provides oversight and assurance of repairs, including DMC and complaints.
- 1.13 Most of the Councils housing stock is managed by Wolverhampton Homes (WH). In response the Housing Ombudsman's 2021 Report 'Spotlight on Damp, Mould', WH developed a working group to drive service and system enhancements. This group has now become the Healthy Homes Committee and meets regularly to review progress with good practice and changes to operational services reported by CWC via the Managing Agents Forum.
- 1.14 Wolverhampton Homes, along with CWC colleagues, has continued to target reports of DMC from customers and has worked with its partners to develop predictive data to proactively identify 'at risk' homes.
- 1.15 Regular reporting of DMC is reported by WH to CWC. DMC is now included as one of the BIG 7 risks. BIG 7 risks KPIs are reported to CWC Landlord Services monthly. Quarterly data analysis is provided the WH Quarterly Delivery Plan Monitoring Group, chaired by the Cabinet Member and Exception Reports provided where performance is outside of target and tolerance. Performance against the Consumer Standards is reported annually to Scrutiny.
- 1.16 DMC risk protocols, now support a robust approach to hazards and risk management and encompass the principles of the Housing Health and Safety Rating System (HHSRS).
- 1.17 Operationally, reporting of DMC has increased significantly. Increasing contractor capacity has been a challenge due to the labour shortage regionally. Performance against the 10-working day inspection and 20 working day 'works' target remains within target or tolerance.

- 1.18 A programme of support is provided, including education and advice on DMC. Healthy Homes Advisors are in place. No access procedures have been strengthened. Knowledge sharing with Adult Social Care and Childrens Services have also been developed to support families with vulnerabilities.
- 1.19 Since November 2022, WH has experienced a significant increase in DMC related service requests from customers; linked to increased awareness and proactively communications. All homes reporting DMC will be visited. The highest proportions of DMC reported are minor and treatable with cleaning and remedial works.
- 1.20 Staffing and financial resources have needed to be reallocated to DMC to meet the increase in demand. Contractors have also been requested to increase labour resources. This has had limited success due to the region wide shortage in suitable labour. The repairs budget overspend is contributed to by DMC requests.
- 1.21 Further actions to mitigate risk include the following:
- Department equality plan to assess impact of language on DMC cases and case handling.
 - Continued analysis of rent arrears and the link to DMC, i.e., the ability to afford appropriate heating and warmth. Link to EPC and property condition.
 - WH has further refined its Predictive Data Analytics tool in collaboration with the Housing Management system provider, NEC. Using algorithms to predict homes that may be at a greater risk of mould forming.

Private Sector Housing

- 1.22 The true extent of damp and mould in the Cities private sector housing remains unknown as this can only be truly ascertained by inspection. A Building Research Establishment Stock Condition Report has been commissioned for other purposes which will also provide a desktop assessment of the extent of damp and mould.
- 1.23 The Private Sector Housing Service receives around 600 complaints each year with 50% involving some level of damp or mould. The Service has / is providing advance support to 13 families effected by severe mould,
- 1.24 The Secretary of State for Levelling Up, Housing and Communities wrote to all local authorities in September 2023. In the letter it was clearly stated that damp and mould should not be dismissed as tenant lifestyle, guidance was published 'Understanding and addressing the health risks of damp and mould in the home'. Local authorities were instructed to publish their plans to prioritise addressing damp and mould in private rented properties.

- 1.25 The Winter 2023-2024 Damp and Mould Action Plan for Private Rented properties is published on the council website. This plan was agreed by both Resident Services Leadership Team and Public Health Leadership Team.
- 1.26 The Private Sector Housing Service robustly enforces:
- Adequate and reasonably economic heating.
 - Insulation.
 - Ventilation such as extractor fans.
 - Professional mould removal required for more extensive issues.
- 1.27 Where there are significant damp and mould issues, the tenants include 'people at increased risk' under the new guidance, and the landlord is not at fault. The Private Sector Housing Service will consider providing:
- Professional removal of the mould.
 - Domestic thermo-hygrometers so the tenant can see the humidity levels.
 - Window vac for removing moisture from bathrooms.
 - Short term load of a dehumidifier, whilst a long-term solution is found.
 - Ventilation upgrades including humidistat extractors, single room mechanical heat recovers ventilation, positive input ventilators.
- 1.28 Effective communication is in place:
- Landlord Forum - damp and mould advisory presentation to landlords.
 - Damp and mould mitigation advice leaflet provided in response to all PRS enquiries regardless of whether they refer to damp and mould.
 - Website updated to provide educational information in relation to damp and mould.
- 1.29 Support provided to all PRS tenants effected by damp and mould:
- Damp and mould removal kits provided to PRS tenants.
 - Domestic thermometer / hygrometer provided to increase awareness of humidity in the home.
- 1.30 The Service also has access to the Household Support Fund to help tenants improve thermal comfort.

1.31 Audit Services: Private Sector Housing Enforcement Audit 2022 – 2023 – Overall conclusion was ‘satisfactory’, specifically noting:

- There is an effective mechanism in place for handling Private Sector Housing referrals. When, received they are triaged and allocated to Environmental Health officers, who action promptly.
- New coding has been introduced to easily identify damp and mould cases.

Other Social Housing Providers

1.32 In the social housing sector, complaints received from residents whose homes are managed by a registered housing provider (not the Council) are sent to Private Sector Housing Enquiries. Registered Providers are regulated by the Regulator of Social Housing and are responsible for management of their stock. City Housing maintains communication through the Social Housing Provider Forum.

Key Outcomes:

Council Housing

1.33 Current DMC related repairs performance and targets

Performance Indicator	Q1	Q2	Q3	Target
% DMC related service requests inspected within target timescale of ‘10 working days.	92.39	89.9	83.37	95
% DMC related works orders completed within target timescale of ‘20 working days.	85.13	68.1	42.53	90
Total number DMC service requests reported	428	439	663	
Total number DMC service requests inspected	460	565	809	
Total number DMC repairs completed	390	279	442	

Private Sector Housing

1.34 The Private Sector Housing Service responds to all priority disrepair cases within one working day, this included severe damp and mould.

1.35 General enquiries are responded to within ten working days.

1.36 The Service is engaging with the local hospital paediatric respiratory Team to ensure that we are aware of children effected by severe damp and mould in their rented home.

A report will be provided to Resident Service Leadership Team about the outcomes of the Winter 2023-2024 Damp and Mould Action Plan.

Future planned activity:

- 1.37 Continued monitoring of DMC reported by Council tenants through the Department Equality Plan, to ensure equality of access to services and identify under-reporting.
- 1.38 Once the Building Research Establishment Stock Condition Report is received it will guide the future work of the service.
- 1.39 The Winter 2023-2024 Damp and Mould Action Plan for Private Rented Properties fills a gap between the landlords' responsibilities and the tenants. The legislative framework is changing with the likely introduction of a decent homes standard for the private rented sector. The service will need to review its response to damp and mould in the sector over the coming months.
- 1.40 DMC and Section 11/82 Claims, a standing item at quarterly Managing Agents Forum.

Risk 10 - Negative assessment against the Consumer Standards – Social Housing (Regulation) Act.

- 1.41 Implementation of the Act has redefined the legislative landscape with the Regulator of Social Housing taking a more robust, proactive approach. A new regulatory regime includes publication of performance data, In-Depth Assessments (IDA) and Inspection (four yearly).

Context

- 1.42 Council owned housing in Wolverhampton is managed on behalf of the council by an arm's length management organisation (ALMO) and three tenant management organisations (TMOs). In this respect, Wolverhampton is unique in its management arrangements, with no other local authority having both an ALMO and TMO's.
- 1.43 WH is the largest MA, managing approximately 19,600 properties on CWC's behalf, with Bushbury EMB managing 950, Dovecotes TMO 754 and New Park Village TMC 290 respectively.
- 1.44 The management functions carried out by the managing agents is governed by the Management Agreements (Modular Management Agreements in the case of the TMOs) that exist between the Council and the managing agents.
- 1.45 The areas of management covered by the management agreements include tenancy management, estate management, repairs, maintenance and concierge services, lettings and voids, leasehold and other charges, housing advice, right to buy, tenant engagement and asset management. Several other services are delivered by WH on behalf of the Council, under separate service level agreements rather than under the management agreement. This includes:
- The city-wide anti-social behaviour service
 - Housing Options (homelessness services)
 - Housing assistance including the delivery of disabled facilities grants.
 - Telecare
 - Out of hours service.
- 1.46 As a part of the Management Agreements between CWC and the MAs key performance indicators (KPIs) are in place and focus on three key areas: (i) Rents Management, (ii) Repairs Management and (iii) Voids and Allocations. This is alongside a wider contract management aspect with a much broader range of KPI's monitored to enable effective oversight.

- 1.47 The KPIs are monitored by Landlord Services and reported to WH Delivery Plan Quarterly Monitoring Group (Chaired by the Cabinet Member), the Executive under the Linked Bodies reporting and annually to Scrutiny.
- 1.48 The Regulator is clear that where management of council owned housing is contracted out to a managing agent the Council remains responsible for Regulatory Compliance.

What are other Local Authorities and Registered Social Landlords doing?

Self-assessment against the consumer standards is a key area of focus for providers. Many Local Authorities are reviewing their strategic oversight and relationship with their Managing Agents and ALMOs. A recurrent discussion at the Councils with ALMOs Group (CWAG) is around Council's achieving sufficient assurance and a clear line of sight regarding its housing services. Some providers have alerted the Regulator of Social Housing to areas of non-compliance and self – referred.

Current activity we are taking to mitigate the risk:

City Housing Improvement Programme (CHIP) commenced with a mandate from Cabinet to:

- Create an overarching Shareholder Board as a focus for housing governance.
- Amend the Management Agreement and Partnership Pledge to reflect the Regulatory landscape and strengthen CWC's ability to lead on improvements where necessary.
- Align WH business planning cycles with those of CWC, including the objectives of the refreshed housing strategy.
- Strengthen the clienting arrangements with defined roles and responsibilities, accountabilities for demonstrating assurance and re-assurance, and clear reporting structures.
- Develop a shared evidence base to demonstrate Regulatory compliance, to support re-assurance testing, a clear line of sight and single view of the truth. CWC lead on creating a Data Process Strategy that ensures data is being recorded consistently across all teams with associated automated Data Quality and reporting.
- Review all SLAs and functions delivered to ensure services are fit for purpose, that adequate monitoring and oversight is in place across CWC which provides assurance to the Council and value for money for residents.

City Housing Landlord Services have commissioned an external provider to conduct surveys for the collection of tenants perception based tenant satisfaction measures (TSMs). The results of which will enable CWC to report the TSMs to the Regulator as required by the Act. This also provides City Housing with recommendations where opportunities for improvements have been identified and will be actioned to improve housing management service delivery.

City Housing has contracted Tpas: Tenant Engagement Experts to carry out the tenant scrutiny and engagement function on behalf of the Council.

A self-assessment against the consumer standards has been undertaken by WH. This has highlighted areas of non or partial compliance with the consumer standards and will provide CWC with an action plan to achieve compliance.

Key Outcomes:

Future planned activity:

Landlord Services to provide a report to Cabinet October 2024 following the implementation of the recommended governance changes to review the effectiveness of the new Management Agreement in strengthening CWC expectations, providing sufficient oversight and whether this has provided the direct line of sight required for Regulatory compliance.

Risk 11 – Housing Supply

- 1.49 There is a risk that the city will not have a suitable housing supply to meet the needs of residents.

Context

- 1.50 Social housing stock in the city is depleting. Right to Buy (RTB) has led to the sale of approximately 168 homes year ending 2023. Over the past three years, this is around 500 council properties sold through RTB. Bidding on council properties also demonstrates high demand. In January 2024, there were 142 properties available to bid on, with 2424 bids being received.
- 1.51 For many decades, Local Authorities were unable to build new homes but programmes to deliver new council affordable homes and address poor performing existing stock through estate regeneration are being developed now with additional funding opportunities provided by Government to assist with viability. The challenge is the available land and ensuring the housing offer meets the needs of all our residents whether general needs or specialist/supported accommodation.
- 1.52 Private developers can contribute to the delivery of new homes and in most cases, offer a mix of tenures and home ownership products. Working closely with developers to ensure they deliver the right property type, the right size and the required affordable housing contribution on each site will contribute to the increase in supply.
- 1.53 Over the past two years since the bounce back from Covid, new home completions increased but are estimated to be around 835 homes per year in future years due to land remediation and viability constraints. This falls short of the Government target of 1080 new homes per year.
- 1.54 There is growing pressure on the private sector and affordability is relatively low in the city. At the end of 2023, the house price to earnings ratio in Wolverhampton was 7.4:1 for a single person in full-time employment compared to the regional house price to earnings 7.7:1. In the private rented sector, the weekly renting cost in the last 12 months for a 3-bedroom property is £219, which represents 35.7% of the average weekly pay.
- 1.55 The demand for a council property has increased, with 6421 households currently on the waiting list. Of these, 717 households are placed in Emergency (Plus) Banding, these households are deemed to have the greatest housing need in the city. The average time to receive a property can vary and attempts to place an average waiting time can be unhelpful as the largest family homes are in scarce supply so it may take several years to be able to meet the housing needs of those households whereas waiting times for instance a one-bedroom flat can be much quicker. Only 1 around 1% of those on the waiting list can be discharged into the private sector, this will be due to lack of availability of private rented properties and as well the affordability of that sector.

- 1.56 The ending of a private rented tenancy accounts for 20.9% of homelessness in the city. Of 2,031 households assessed by the Homelessness Team, 95% were owed a statutory duty. Competing demand and supply of housing in the city exacerbates the demand on temporary accommodation. At the end of 2022, there had been an increase of 30% on total placements in temporary accommodation.
- 1.57 Wolverhampton Homes Lettings team have received in the region of 1900 Lettings enquiries in this financial year, in addition there have been 455 MP and Councillor enquiries in the same period. Whilst necessary, responding to such a high rate of enquiries is resource intensive and adds an additional burden to the work of the Lettings Team.

What are other Local Authorities and Social Landlords doing?

- 1.58 Some Local Authorities use or have introduced Direct Lettings for particular groups including those Homeless and in priority need.
- 1.59 Birmingham City Council are considering closing their waiting list to new applicants and whilst still providing for those cases where this is an exceptional need.
- 1.60 Liverpool has approval to procure properties from the private sector using an agent to do this on their behalf.
- 1.61 Some Local Authorities have developed Social Lettings Agencies, again giving Council's the opportunity to have greater oversight on the standards expected in the PRS and more direct access to PRS stock.
- 1.62 Some Local Authorities seek 'nominations' from PRS Landlords where the Council has had to intervene and provided some degree of financial support/ improvement to a home. (a nomination is where the Council has the ability to allocate persons from their waiting list to a property)

Current activity we are taking to mitigate the risk:

- 1.63 The Council and Wolverhampton Homes (who manage the Council's choice-based lettings scheme Homes in the City) continue to provide information and education on housing availability to residents, officers, and Councillors.
- 1.64 The Council's data analytics team have supported City Housing in developing a Housing dashboard that will be available to all members and to the public. The intention is that by sharing information about Council Housing stock levels, lettings and waiting list data, both members and residents will feel empowered to be able to make informed decisions and choices. This should see a reduction in lettings enquiries.
- 1.65 Increased support to engage with the private rented sector and landlords directly (e.g., Call Us First, Landlord Forum) to provide access to and maintain tenancies.

- 1.66 Homelessness Task and Finish Group monitoring homelessness numbers, TA use and spend. Identifying improvements and better value TA.
- 1.67 Housing support fund funded by the HRA available to support tenants to remain in their homes where increasing rent costs are unaffordable.
- 1.68 Money Smart Service through WH available
- 1.69 Homelessness Service provided from the Civic 5 days a week: seeing increasing footfall.
- 1.70 Housing Development Team restructured and appropriately resourced to establish a housing development pipeline and access Homes England and WMCA funding. The team have also developed a dedicated regeneration team who will ensure that existing stock is refurbished/redeveloped where necessary.
- 1.71 Development of a refreshed Housing and Homelessness Prevention Strategy. This will enable the Council and partners to understand the priorities for Housing in the coming years and identify where change and innovation can best be utilised. Both strategies will be backed up by a comprehensive evidence base and widespread public consultation.

Key Outcomes:

Future planned activity:

Risk 12 – Housing Standards

- 1.72 There is a risk that housing standards in the city are not maintained or are poor, which could cause risk to health.

Context

- 1.73 Ageing housing stock

The Council has over 21,500 council homes and the age of the housing stock presents a significant challenge in maintaining good quality homes. Approximately one-third of our homes were built prior to World War 2, so are at least 85 years old, of which 1,594 are already over 100 years old.

Pre 1919 construction	1%
1919-1944 construction	27%
1945-1964 construction	43%
1965-1980 construction	25%

1981 construction onwards	4%
---------------------------	----

More than 70% of council homes are over 60 years old (13,479 homes). Wolverhampton also has a high proportion of stock built during the inter-war period. Post War homes (1945-64) account for over 40% of the stock, these also account for a very high proportion of 'non-traditional' and often defined as 'defective' homes. A further 25% of homes were built between 1964 to 1980, with just 4 per cent of homes being built after 1980.

1.74 Energy efficiency

Due to the council stock profile and design, improving energy efficiency is a challenge. The table below shows the EPC rating for the stock:

Very energy efficient (lower running costs)	Properties	%
(92 plus) rating A	124	0.6
(81-91) rating B	634	3.0
(69-80) rating C	11,127	52.0
(55-68) rating D	8,839	41.0
(39-54) rating E	759	4.0
(21-38) rating F	39	0.2
(1-20) rating G	0	0.0

However, investment programmes are targeted to the most poorly performing stock with programmes detailed below to address this challenge.

What are other Local Authorities and Social Landlords doing?

Many neighbouring Local Authorities have carried out stock condition assessments and identified improvement and regeneration programmes to address poor performing stock or stock that is no longer fit for purpose.

The cost of retrofit programmes and redevelopment of council estates requires funding support from Government including Homes England and Combined Authority to enable the HRA to deliver these programmes.

Current activity we are taking to mitigate the risk:

- 1.75 Non-traditional stock investment planned, and area renewal programmes planned, with initial Cabinet approvals in place for phase 1; redevelopment of New Park Village and the Tarran Bungalows.
- 1.76 Retrofit programme of £27.5m to improve 413 non-trads across the city started May 2023.
- 1.77 Capital programme approved for new build programme, estate remodelling, disabled adaptations, Decent Homes stock condition improvements and other stock improvements (inc. structural works, lifts, fire safety in med and high rise, roofing, door security and remedial works to non-trads).
- 1.78 Wolverhampton Homes Delivery Plan Quarterly Monitoring Group, chaired by the Cabinet Member, provides review of delivery plan objectives, KPIs and financial performance.
- 1.79 The WH/CWC Financial Information Group, chaired by the Director of Finance, provides financial monitoring and scrutiny, including the repairs and capital investment programmes.
- 1.80 Savills review of the Housing Revenue Account.
- 1.81 HRA Business Plan 2024-25 to be considered by full Council 24.01.24.
- 1.82 Demonstratable improvements to Council housing stock, including fire safety (sprinklers, fire doors) and high-rise improvements.
- 1.83 Known stock improvement pressures are considered and further scrutiny and oversight will be provided to Councillors, in particular about investment / disinvestment options.
- 1.84 Excellent performance under the BIG 7 risks; fire, asbestos, gas, electrical, legionella, lifts, DMC.
- 1.85 Part of the TPAS EGAGE project on high rise fire safety.
- 1.86 Housing Assistance Policy to be reviewed to ensure ongoing suitability to support residents.
- 1.87 Success in attracting funding to improve the energy performance of private homes.

Key Outcomes:

Future planned activity:

- 1.88 Continuation of new build programme to deliver new more energy efficient homes across the city.

- 1.89 Ongoing stock assessment to identify poor performing properties to consider for future renewal programmes.
- 1.90 Identify suitable funding opportunities to support retrofit programmes and estate regeneration programmes.
- 1.91 Continue to support private homeowners by obtaining and promoting grants to improve the energy performance of their homes.

3.0 Progress

- 3.1 To continue to monitor and evaluate the Capital Programme and Housing Revenue Account to ensure approved programmes and projects meet the priorities and achieve our strategic objectives to meet the needs of our residents and provide good quality affordable housing.
- 3.2 The strategic risk register will be updated as required and presented at approximately quarterly intervals to the Committee. The strategic risk register does not include all the risks that the Council faces. It represents the most significant risks that could potentially impact on the achievement of the corporate priorities. As stated above, other risks are captured within directorate, programme, project or partnership risk registers in line with the Council's corporate risk management framework.

4.0 Financial implications

- 4.1 There are no financial implications associated with the recommendations in this report as Councillors are only requested to note the risk register summaries. Financial implications may arise from the implementation of housing related programmes and will be evaluated and reported separately if required.

5.0 Legal implications

- 5.1 Although there may be some legal implications arising from individual housing related programmes which will be considered through project approvals, there are no direct legal implications arising from this report.

6.0 Equalities implications

- 6.1 There will be equalities implications arising from the implementation of housing projects employed to mitigate individual risks. The equalities implications will be addressed and monitored at various stages of activity to manage each risk.

7.0 All other implications

- 7.1 Although there may be implications arising from the implementation of the housing projects employed to mitigate individual risks, there are no direct implications arising from this report.

This report is PUBLIC.
[NOT PROTECTIVELY MARKED]

8.0 Schedule of background papers

Strategic Risk Register Update – Audit & Risk Committee 22 January 2024