REDDITCH BOROUGH COUNCIL

Audit, Governance and Standards Committee **23rd July 2026**

Corporate Risk Update Quarter 1 2026/27

Relevant Portfolio Holder		Councillor Craig Warhurst
Portfolio Holder Consulted		Yes
Relevant Assistant Director		Debra Goodall
Report Author: James Walton	Job Title: Director of Finance and Section 151 Officer. Contact email: James.walton@bromsgroveandredditch.gov.uk Contact Tel: 07990 840078	
Wards Affected		All
Ward Councillor(s) consulted		N/A
Relevant Strategic Purpose(s)		Aspiration, work and financial independence
Non-Key Decision		
If you have any questions about this report, please contact the report author in advance of the meeting.		

1. RECOMMENDATIONS

The Audit, Governance and Standards Committee is asked to RESOLVE to:

1.1 Consider, with appropriate comment, the strategic risks and mitigations detailed in the Corporate Risk Register.

1.2 Consider, with appropriate comment, the changes to risk scores, owners, leads and the removal or addition of risks over the period.

2. BACKGROUND

2.1 Opportunity Risk Management is the Council's approach to making informed decisions that both manage uncertainty and maximise positive outcomes for our communities, services and organisation.

2.2 The Corporate Risk Register collates, and helps officers manage, monitor and report on, the Council's most significant strategic risks in relation to achievement of corporate priorities. The Council is seeking to improve risk management activities and will continue to review all corporate risks and the wider systems of internal governance.

2.3 An officer-led Strategic Risk Management Group is in place and initial meetings with the Member Risk Champion are being diarised. Regular consideration of corporate risks at an Executive level will be instigated on a more formal basis over the coming months. The Strategic Risk

Management Group provides strategic, cross-organisational oversight of the Corporate Risk Register, providing support and appropriate challenge to risk owners. The aim is to improve awareness of interdependencies between corporate and service-level risks, and to ensure that strategic risks effectively inform reporting to SLT, Cabinet, and the Audit, Governance and Standards Committee**.**

2.4 An audit of the Council's improved risk management arrangements is expected in January 2027.

Corporate Risks

2.5 Corporate Risks represent those issues that are likely to require consideration on a cross-organisational basis. The following definition of how risks move from being "departmental" to being "corporate" in nature has been adopted:

"*For a Risk to move from being 'departmental' in nature to being 'corporate' in nature it must have significant impact on Council's finances, be cross-departmental in nature, and/or result in serious reputational damage. The Officer Risk Board will vet departmental risks using this definition to move them to Corporate Risks at their quarterly meetings."*

2.6 Corporate Risks identified in the risk register are summarised below in table 1.

Table 1: Corporate Risk Register

Corporate Risk Ref	Risk	Owner	Risk Lead	Inherent	Residual	Last Updated (Type/Date)
COR001	Non-Compliance with Health and Safety Legislation	Guy Revans	Hannah Corredor	20	9	Scores changed 02/02/26
COR002	Financial Resilience of the Council and ability to manage financial shocks	James Walton	Debra Goodall	16	6	None
COR003	Failure to meet requirements of Regulator for Social Housing	Guy Revans	Simon Parry	15	12	Scores changed 03/02/26
COR006	Protection from Cyber Attack	John Leach	Mark Hanwell	25	16	Scores changed 03/02/26

COR007	Adequate Workforce Planning	Hannah Corredor	Becky Talbot	12	9	Scores changed 03/07/25
COR008	Resolution of Section 24 Notice	James Walton	Debra Goodall	6	6	None
COR011	Cost of Living Crisis	Judith Willis	Lisa Devey	12	9	Risk review 25/03/26
COR013	Failure to meet waste requirements of the Environment Act 2021	Simon Parry	Matthew Austin	16	9	Scores changed 25/03/26
COR014	Local Government Reorganisation (LGR) prevents the Council from delivering business as usual and work associated with LGR is also ineffective	John Leach	Hannah Corredor	20	12	Scores changed 21/01/26
COR019	Risk of Terrorist Attack	Judith Willis	Bev Houghton	8	8	Scores changed 11/12/25
COR021	Town Deal Programme	Rachel Egan	Neil Batt	12	8	Scores changed 12/12/25
COR022	Compliance with the Procurement Act 2023	Claire Felton	Claire Green	9	4	Scores changed 03/02/26
COR024	Non-implementation of the Renters Rights Act 2025 (New)	Judith Willis	Matthew Bough	6	4	Scores changed 11/12/25
COR027	Remedial Fire Safety Actions	James Walton	Debra Goodall	9	9	Scores changed 27/02/26
COR028	LGR ICT changes increase the risk of successful Cyber Attacks	Mark Hanwell	Mark Hanwell	16	12	New Risk

2.7 A new Opportunity Risk Strategy (ORMS) is being developed in conjunction with Risk Champions and will be considered for approval at a future Audit, Governance and Standards Committee Meeting. A review of all corporate risks will be completed over the coming months aligned to the new ORMS and in consideration of prevailing local, national and global risk environment.

2.8 To help inform this review at an early stage, a narrative of each risk and current understanding of the risk score has been completed and summarised in table 2 below.

2.9 A request by Audit, Governance and Standards Committee for a specific review of remedial fire actions in response to Corporate Risk COR027 is subject to a separate report, attached at Appendix 1, with a summary included in Table 2 below.

Table 2: Corporate Risk Narrative and Detailed Scoring

<table>
<tr><th>Corporate Risk Ref</th><th>Risk</th><th>Narrative</th></tr>
<tr><td>COR001</td><td>Non-Compliance with Health and Safety Legislation</td><td>The risk relates to health and safety which is overseen through a formally established Health and Safety Committee, where key areas of concern are discussed. Risk assessments are now in place, and the area is being managed. As health and safety spans the whole council, it remains a significant area of risk and requires regular review. At the point when the risk was last assessed, not all risk assessments were readily available for review, and the current scoring will continue to be updated.

SCORING
<table><tr><th></th><th>Impact</th><th>Likelihood</th><th>Priority</th></tr><tr><td>Inherent</td><td>5</td><td>4</td><td>20</td></tr><tr><td>Residual</td><td>3</td><td>3</td><td>9</td></tr></table>
The inherent risk score reflects the position if no controls were in place. A high inherent risk for health and safety is appropriate due to the nature of the subject area. The residual risk score reflects the risk after controls have been applied. Various controls are in place across several areas, reducing the risk to a residual score of 9. It was further observed that, given the nature of some council services, there will always be an inherent level of health and safety risk, and it unlikely that the residual risk could be reduced significantly below its current level.</td></tr>
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<td>COR002</td>
<td>Financial Resilience of the Council and ability to manage financial shocks</td>
<td>This risk relates to the ability of the Council to set a legal and sustainable budget over the life of the medium term financial plan (3 years). To manage this risk, the s151 Officer must ensure the budget is robust and the reserves are adequate.

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The impact and likelihood score for the inherent risk reflect underlying fragility in the current planning process, linked to turnover within the senior management and within the finance team. A revised s25 statement (the s151 Officers assessment of the Robustness of Estimates and Adequacy of Reserves) will be completed in February 2027 ahead of the 2027/28 budget and, alongside the budget, will be the culmination of the work completed to manage this risk.</td>
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<tr>
<td>COR003</td>
<td>Failure to meet requirements of Regulator for Social Housing</td>
<td>Risk COR0003 relates to Redditch Borough Council's compliance with the Regulator of Social Housing's Consumer Standards and the improvement requirements arising from the Regulatory Inspection Report issued in July 2025. The risk reflects the potential impact of not fully meeting the required standards, including adverse outcomes for tenants, reputational damage to the Council and possible regulatory or financial consequences. The underlying causes include the need to strengthen monitoring arrangements, ensure sufficient capacity and resources, and respond effectively to changes in legislation and regulatory expectations.

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<tr><td>Residual</td><td>4</td><td>3</td><td>12</td></tr>
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The residual risk is currently scored as Impact 4 and Likelihood 3. This reflects the seriousness of the</td>
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<tr><td></td><td></td><td>potential consequences should compliance not be achieved, while recognising that improvement activity is already underway. The likelihood score may reduce over time as the Housing Improvement Plan is delivered, evidence of progress is strengthened, and the Council is able to demonstrate sustained compliance with the Consumer Standards.
Key controls include the Housing Improvement Plan, approved by Executive in September 2025 and refreshed in June 2026, monthly engagement with the Regulator of Social Housing, and strengthened governance arrangements to oversee delivery, monitor progress, manage risks and provide senior officer challenge. Progress is reported quarterly to Executive, supporting transparency and member oversight. The annual tenant perception survey required by the Regulator has also shown year-on-year improvements in performance and satisfaction over the last three years, providing further evidence of progress and ongoing assurance.</td></tr>
<tr><td>COR006</td><td>Protection from Cyber Attack</td><td>Work has been underway for some time to identify and implement automated cyber security monitoring tools, specifically a Security Information and Event Management (SIEM) solution. The proposed solution would analyse the large volume of security logs generated each day, which would be impractical to review manually. Next steps are due to be discussed by the Cyber Security Group, to finalise requirements, develop a business case, secure funding and implement the solution. This work is expected to help reduce the residual risk over time, although implementation and embedding of the controls will take time and the risk will not reduce immediately.

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The risk remains high because cyber attacks are occurring continually and represent an ongoing threat. Although many attacks may have little or no impact because existing controls prevent them from</td></tr>
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<tr><td></td><td></td><td>succeeding, there remains a risk that a successful attack could have a significant impact. Cyber security is a risk that is unlikely ever to be eliminated entirely. Large organisations with substantial investment in cyber security, continue to experience successful attacks and while additional controls are being implemented to improve the current position, this is expected to remain a high risk area.</td></tr>
<tr><td>COR007</td><td>Adequate Workforce Planning</td><td>Workforce planning remains a Corporate Risk due to its fundamental importance in ensuring the Council can deliver its statutory functions and services effectively. The availability of a suitably skilled and appropriately resourced workforce underpins service continuity, operational resilience, and the quality of decision-making across the organisation. As this risk impacts multiple service areas and is directly linked to several departmental risks, it continues to be appropriately managed at a corporate level.

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The risk is primarily associated with the need to ensure sufficient capacity, capability, and resilience within the workforce to meet current and future service demands. Where workforce planning is not effectively managed, there is a potential impact on service delivery, increased financial pressures through reliance on temporary staffing, and risks associated with loss of organisational knowledge and insufficient succession planning.
It is important to note, however, that current workforce indicators do not suggest a systemic issue in relation to recruitment or retention. Staff turnover remains low and stable at 8.2% for 2025/26, which is significantly below the national local government average of 13.4%. This demonstrates strong organisational retention and stability, particularly following a period of increased labour market movement after the COVID-19 pandemic. Similarly, recruitment activity has been positive, with 166 vacancies advertised over the past</td></tr>
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		12 months, of which 153 roles were successfully filled, representing a 92% success rate. A total of 4,081 applications were received, indicating strong market interest in roles. This level of success suggests that roles are appropriately designed, and that the organisation remains attractive to candidates. Several key controls and mitigating actions are in place to manage this risk and provide assurance. Establishment control arrangements are now embedded within management processes, with regular review of workforce data including vacancies and agency usage. Managers have clear and consistent access to establishment information on a monthly basis, enabling informed workforce decisions and improved oversight. Workforce planning has also been embedded within the Service Business Planning process, ensuring that staffing requirements are considered as part of wider service delivery planning and financial management. In addition, organisational development processes further support workforce sustainability. A strengthened, mandatory appraisal framework has been introduced, including defined appraisal windows and a clear focus on individual training and development requirements. This ensures that workforce capability is actively managed, supports succession planning, and enables the organisation to build internal capacity over time. Collectively, these controls demonstrate that workforce planning is being actively managed and embedded within core organisational processes. Whilst the risk remains on the Corporate Risk Register due to its strategic importance and cross-cutting nature, the current evidence indicates a stable workforce position, effective recruitment outcomes, and improving maturity in workforce planning arrangements. Ongoing monitoring through corporate governance frameworks will ensure that the effectiveness of these controls continues to be reviewed and strengthened over time.
COR008	Resolution of Section 24 Notice	This risk relates to the statutory recommendation presented to Council from external audit relating to the

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<tr><td></td><td></td><td>2020/21 end of year accounts, carried forwards through to 2022/23 and impacting on later years.

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This risk is now substantially managed through the current closedown procedures, the disclaimed opinion provided for the 2023/24 and 2024/25 statement of accounts and the production of the 2025/26 Draft Statement of Accounts, published by the statutory deadline of 30 June 2026.</td></tr>
<tr><td>COR011</td><td>Cost of Living Crisis</td><td>Risk COR011 relates to the impact on the Council and residents from the cost of living crisis which has been inherent since the end of the Covid pandemic. It continues to affect the nation with more recent impacts following wars across the world. The residual risk scores a 3 for impact with likelihood at 3 and this reflects the ongoing demand and use of support services that residents continue to call up, including food banks, the new Crisis Resilience Fund and take up of advisory services such as Citizens Advice.

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The score is mitigated by the availability of Council services including the Financial Inclusion Team and Housing Sustainability Team alongside partner services such as DWP and the voluntary sector. The work is co-ordinated via the COL Partnership Group.</td></tr>
<tr><td>COR013</td><td>Failure to meet waste requirements of the Environment Act 2021</td><td>Risk COR0013 relates to the Council's ability to meet our statutory duties for waste and recycling requirements arising from the Environment Act 2021 and the Government's Simpler Recycling reforms.</td></tr>
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<td>Whilst the Council's dry recycling service is compliant with our responsibilities, neither Council is currently compliant with the requirement to operate weekly household food waste collections from April 2026 as a result of delays in government funding, and the decision to not supply promised on-going revenue funding to support this as a new burden.

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The residual risk is currently scored as Impact 3 and Likelihood 3. This reflects the ongoing reputational and financial consequences of the Council's current position and potential risk of judicial review for non-compliance with a statutory service. The score is mitigated by the scale of non-compliance with this statutory duty nationally, and mobilisation activity to implement a partial service within the 2026/27 financial year across both Council areas.
A report is planned for Members in July 2026 setting out the planned partial implementation of this service utilising funding already approved within the MTFP, and the additional budget required to support expansion of the service to all households and achieve full compliance with this statutory duty.</td>
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<td>COR014</td>
<td>Local Government Reorganisation (LGR) prevents the Council from delivering business as usual and work associated with LGR is also ineffective</td>
<td>This is a significant organisational risk due to capacity presenting a considerable challenge, particularly in certain services (such as ICT), with escalation routes to senior management. Officers are working on solutions to address these resource pressures. The risk forms part of the wider context for much of the Council’s current work and that its implications extend to staff resources and the organisation’s ability to deliver services during the transition process. Government ministers had indicated that the established LGR timetable remains unchanged, and that understanding the implications of future decisions remains important.</td>
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<tr><td></td><td></td><td>SCORING<table><tr><th></th><th>Impact</th><th>Likelihood</th><th>Priority</th></tr><tr><td>Inherent</td><td>4</td><td>5</td><td>20</td></tr><tr><td>Residual</td><td>4</td><td>3</td><td>12</td></tr></table>The Council has assessed thar there to be a considerable risk associated with LGR in terms of delivery, transition and the impact on staff resources. The Annual Governance Statement identified that LGR represents a significant risk but is being well managed and coordinated and is not considered to represent a governance issue at the present time.</td></tr>
<tr><td>COR019</td><td>Risk of Terrorist Attack</td><td>Risk COR019 relates to the impact on the Council and communities from the risk of a terrorist attack.

SCORING<table><tr><th></th><th>Impact</th><th>Likelihood</th><th>Priority</th></tr><tr><td>Inherent</td><td>4</td><td>2</td><td>8</td></tr><tr><td>Residual</td><td>4</td><td>2</td><td>8</td></tr></table>The residual risk scores a 4, with likelihood at 2, this reflects the seriousness that an attack would have to the community whilst reflecting that local areas are not considered to be high target. This assessment is based on annual and ongoing national and local intelligence and data shared by the police. The score is mitigated by the development and implementation of the Action Counters Terrorism Plan, attendance at NPSA Public Authority Information Briefings and the roll out of Prevent training.</td></tr>
<tr><td>COR021</td><td>Town Deal Programme</td><td>This risk relates to delivery of the Town Deal Programme that consists of:
• Town Centre Public Realm Works
• Innovation Centre – construction of new innovation centre on the old police station site in the town centre (construction only)

The Town Centre public realm works that are affordable within the budget envelope are now complete. Two further schemes are currently out of</td></tr>
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scope due to funding availability as agreed with MHCLG and members.

The Innovation Centre construction contract is due to be signed this month with construction then commencing.

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The inherent impact risk is rated as 4 because failure to deliver the programme could result in funds being clawed back by government and high reputational risk both in terms of the public and government perspective. The inherent likelihood risk is 3 because without the necessary measures in place, failure to deliver is likely. This is mitigated through dedicated project management resource and governance and oversight through the Town Deal Board, Capital Programme Board, Updates to every Executive briefing and ad hoc reports to the Senior Leadership Team as required. The residual impact remains at 4 because the impact of non-delivery remains the same. The residual likelihood is 2 as at this stage of the programme as it is unlikely that the programme will not be delivered.
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<tr>
<td>COR022</td>
<td>Compliance with the Procurement Act 2023</td>
<td>This risk is being managed through a programme of officer training and ongoing implementation activity. Three sets of training sessions have been delivered to officers, with further sessions scheduled in the coming weeks and additional training planned for the autumn. Training for Members is also planned. In addition, a decision has been taken regarding a "no contract, no order" deadline, and extensive communications have been issued advising that from 30 September any order submitted without an associated contract will not be able to be raised. Work is progressing as planned and compliance activity is being embedded as part of ongoing day-to-day business.</td>
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The scoring of the risk reflects that it is an area of compliance that requires continual attention and will not disappear entirely. The risk will remain because the legislation must be complied with on an ongoing basis, but the controls being implemented, including training, communication and contractual controls, are intended to mitigate the risk and keep it at a manageable level.</td></tr>
<tr><td>COR024</td><td>Non-implementation of the Renters Rights Act 2025 (New)</td><td>This has been implemented, all paperwork has been updated, staff have been trained, the necessary committee processes had been completed, delegations had been amended and the Housing Enforcement Policy had been updated. Officers have not experienced a significant increase in workload following implementation of the Act. The main increase in activity occurred before the abolition of Section 21 notices. Rather than receiving specific complaints about non-compliance with the Act, officers are identifying instances where landlords have not implemented requirements correctly through enquiries and complaints received from residents.
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The inherent and residual scores are within the low category because the Act has been implemented and procedures are now in place. Given the legislation is still relatively new the risk will remain under review for a period before being considered for removal from the corporate risk register.</td></tr>
<tr><td>COR027</td><td>Remedial Fire Safety Actions</td><td>The control action to review capital financing arrangements has progressed significantly during</td></tr>
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2026/27. Additional HRA capital funding has now been approved, creating the capacity required to accelerate delivery of the outstanding fire safety remedial works, primarily the replacement and upgrading of fire doors across the Council's housing stock.

A detailed delivery programme has been established, and additional specialist contractors have been appointed to increase delivery capacity and bring forward works that were previously programmed for future years. These measures are expected to reduce the backlog of outstanding actions and enable completion of the fire door replacement programme across all Council housing stock by the end of 2027/28.

To support longer-term investment planning, the Council is also commissioning an independent review of the 30-year HRA Business Plan. This review will assess the overall sustainability of the HRA, explore opportunities to increase borrowing capacity and identify options to support future investment in both existing homes and new housing provision. This work will help make sure the Council can continue to meet future safety, compliance and investment needs in a financially sustainable way.

SCORING

	Impact	Likelihood	Priority
Inherent	3	3	9
Residual	3	3	9

The risk is assessed as in consideration of the potential impact on resident safety. Existing fire doors remain in place and provide protection, but do not meet current standards and require upgrading. Ongoing fire risk assessments and the planned replacement programme help reduce the likelihood of the risk occurring.

A request by Audit, Governance and Standards Committee for a specific review of remedial fire actions in response to Corporate Risk COR027 is subject to a separate report, attached at Appendix 1.

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<tr><td></td><td></td><td></td></tr>
<tr><td>COR028</td><td>LGR ICT changes increase the risk of successful Cyber Attacks</td><td>
This is a new risk relating to the cyber security implications of Local Government Reorganisation (LGR). ICT managers and technical specialists had recently met with a supplier that specialises in the integration of organisations and networks. During those discussions, it was highlighted that the process of bringing multiple council networks together presents cyber security challenges. Cyber attackers are likely to be aware of the published timetable for LGR and may seek to exploit any weaknesses in cyber defences during the transition. It is noted that integrating multiple networks could result in a reduced degree of control compared to the current position, and that managing cyber security across several organisations is complex.
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There is a real risk associated with the integration of multiple council networks because an issue affecting one authority’s network could potentially impact others once systems are connected. This risk is receiving active management throughout the LGR process and although similar transitions have been completed successfully elsewhere and the risks are manageable, the complexity of network integration means the threat remains significant.
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2.10 As part of the quarterly review of Corporate Risks, updates from previous reporting (most recently Quarter 4 2025/26) are collated and included in table 3 below.

Table 3: Corporate Risk Changes Q4 2025/26 to Q1 2026/27

Risk	**Change and reason**	**Residual Risk Score**	**Last Updated**
LGR ICT changes increase the risk of	This is a new risk relating to the cyber security implications of Local Government Reorganisation	12 – Medium	New risk added 25/06/26

successful Cyber Attacks	(LGR). The changes required to the ICT Infrastructure of all the councils to bring them together for LGR, can increase the risk of a security measure no longer working or being valid at a time when changes introduce risk.		

2.11 In addition to Corporate Risks, the council's '4Risk' system also holds details of service risks. These risks are held at a departmental level and reviewed regularly. Where necessary, service risks can be escalated to corporate risks when meeting the agreed criteria. There are currently 47 service risks identified on the system with no increase in total number since the last period. These are summarised in table 4 below.

Table 4: Service Risks

Service Area	Last period	**Red following mitigation**	Last period	**Amber following mitigation**	Last period	**Green following mitigation**	Total number of risks last period	**Total number of risks**
Customer Services			1	1			1	1
Benefits			1	1	3	3	4	4
Revenues	1	1	2	2	1	1	4	4
Finance			1	1	2	2	3	3
Environmental Services			4	4	3	3	7	7
Leisure & Culture Services			1	1	1		2	1
Regen. & Property Services			4	4	2	2	6	6
ICT			1	1			1	1
Housing			9	9	7	7	16	16
Community Services					3	3	3	3
HR					1	1	1	1
Total departmental risks	1	**1**	24	**24**	23	**22**	48	**47**

2.12 There is currently one service risk that appears in the high category. This risk is in the Revenues service and a narrative of the risk and current understanding of the risk score has been completed and summarised in table 5 below.

Table 5: Service Risk Narrative and Detailed Scoring

<table>
<tr><th>Service Risk Ref</th><th>Risk</th><th>Narrative</th></tr>
<tr><td>REV007</td><td>Data Compliance and security of data</td><td>In March 2025 two incidents of disclosure of personal data were logged, including one disclosure where a customer was logged under safeguarding as a MARAC (Multi-Agency Risk Assessment Conference) case. Information Management requested that Data Compliance and Security was logged as a risk within the service risk register.

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Actions to control the risk of disclosure include:
Provide updates to team members on processes for adding address information to core person records.
Update the process for inclusion of MARAC indicators on account
Cleanse vulnerability and MARAC code data.
Develop process for removal of MARAC codes when status changes.
Use of indicators to identify MARAC and Vulnerability cases.
Actions are being developed and completed to mitigate this risk in future.</td></tr>
</table>

3 FINANCIAL IMPLICATIONS

3.1 Effective risk identification, and management of those risks, is integral to the delivery of effective and efficient services to residents and businesses. Risk impacts can be both financial and reputational. Future risk reporting will increasingly align to a financial risk framework covering revenue, capital, cash flow and wider corporate dependencies.

3.2 The Council spends significant sums insuring itself and must also hold reserves to mitigate the costs of risks should they happen. A comprehensive Risk Management approach ensures risk and its consequences, including financial ones, are minimised.

3.3 A review of the Council's General Fund Balance, aligned to a revision of the Council's corporate risks, is expected to be completed for inclusion in the Council's Medium Term Financial Plan.

4 LEGAL IMPLICATIONS

4.1 No Legal implications have been identified.

5 OTHER – IMPLICATIONS

Local Government Reorganisation & Relevant Council Priority

5.1 A comprehensive Risk Management approach ensures risk and its consequences is minimised for the Council.

Climate Change Implications

5.2 The green thread runs through the Council plan This includes risks linked to activities and actions that link to our climate

Equalities and Diversity Implications

5.3 If risks are not mitigated it can lead to events that could have Customer/Equalities and Diversity implications for the Council.

6 RISK MANAGEMENT

6.1 The Corporate Risk Register includes high level risks. Each risk is rated between 1 and 5 as to how likely it is to occur and between 1 and 5 as to the potential financial and/or reputational impact. The product of these two numbers gives the initial rating. Mitigation is then put in place to help reduce the risk rating. The Risk Scoring Matrix is attached at Appendix 2.

7 APPENDICES

7.1 Appendix 1 – Report on Action Plan to Tackle the Backlog in Fire Remedial Actions

7.2 Appendix 2 – Risk Scoring Matrix.

Appendix 1

Action Plan to tackle the backlog in fire remedial actions

Relevant Portfolio Holder	Councillor Ashley Monk
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Simon Parry – Assistant Director for Environmental and Housing Property Services
Report Author: Simon Parry	Job Title: Assistant Director for Environmental and Housing Property Services Contact email: simon.parry@bromsgroveandredditch.gov.uk
Wards Affected	All
Ward Councillor(s) consulted	No
Relevant Council Priority	Community and Housing
Non-Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	

1. RECOMMENDATIONS

The Committee is asked to:

1) Note the Plan to tackle the backlog in fire remedial actions.

2. BACKGROUND

Regulator of Social Housing

2.1 The Social Housing (Regulation) Act 2023 strengthened the consumer regulation framework, amending the Housing and Regeneration Act 2008 and introducing revised Consumer Standards. Following consultation in 2023, the Regulator of Social Housing (RSH) published the new Consumer Standards and its first Code of Practice in February 2024. From April 2024, the RSH gained powers to proactively inspect all social landlords with more than 1,000 homes, marking the return of active regulation for local authority landlords.

2.2 An inspection of Redditch Borough Council's landlord services, published on 30 July 2025, resulted in a C3 grading. The judgement noted major issues: many overdue repairs, poor data quality, weak oversight, and unclear repairs policy. Fire safety was a concern, with almost 3,000 overdue fire risk assessment actions and limited tenant engagement or influence.

2.3 Following the Regulatory Judgement, the Executive Committee received a report on 2 September 2025 setting out the outcome of the judgement, together with the Housing Improvement Plan and the proposed governance arrangements to oversee delivery. Progress against the Improvement Plan is reported to the Executive on a quarterly basis. In addition, a separate quarterly Housing Performance report is presented, which includes key performance information across the Housing Service, including updates on fire safety compliance. These reports are also typically subject to scrutiny by the Overview and Scrutiny Committee, providing further challenge and assurance on progress and performance.

Fire Safety

2.4 The principal statutory requirement is the Regulatory Reform (Fire Safety) Order 2005 (RRO), which requires the Council to carry out regular fire risk assessments of all communal areas within its housing stock by a competent person. These assessments ensure that buildings are maintained in accordance with their original design, protecting the effectiveness of key fire safety measures such as compartmentation and means of escape.

2.5 A rolling programme of Fire Risk Assessments (FRAs) is in place. Sheltered accommodation is assessed annually, while General Needs properties are assessed on a three-year cycle. All FRAs are undertaken by external consultants, Ridge and Partners LLP.

2.6 There have been some delays experienced in delivering the FRA programme due to some capacity issues within Ridge, as the Sector has placed increasing demand for this activity. We have ongoing dialogue to resolve this but continue to utilise existing FRAs to remove any outstanding issues within affected blocks.

2.7 The main operational issues identified through the Fire Risk Assessments relate to fire door replacement and compartmentation. Fire door actions are consistently recorded as requiring checks to confirm that doors provide adequate fire resistance, have appropriate ironmongery and operate correctly. These actions account for more than 90% of the high-risk items shown in the table above.

'All flat entrance doors should be checked to see if they provide adequate fire resistance, have the correct ironmongery and operate correctly. The doors should be upgraded as necessary to achieve FD30S standard, with a self-closing device capable of closing the door in its frame from any angle and overcoming the resistance of any latch.

2.8 Building Regulations do not require existing fire doors to be upgraded to current standards unless building works are being undertaken. However, the Regulatory Reform (Fire Safety) Order requires fire doors to be suitable for the level of risk and maintained in effective working order.

2.9 Fire doors are already in place across the Council's stock. However, a rolling replacement programme has been undertaken in recent years to upgrade doors to modern standards. Additional inspections have also been completed to assess compliance with the requirements above, identifying repairs such as new or replacement door closers where needed to provide adequate protection. Where doors are replaced through the programme, they are installed to modern FD30S standards.

3. OPERATIONAL ISSUES

Remedial Actions

3.1 From the FRAs we have the table below sets out the current position regarding Outstanding remedial actions identified through the FRAs are set out in the table below together with progress through the 2025/6 financial year.

Table 1: Fire Remedial Actions

2025/6	Q1	Q2	Q3	2nd July 2026	Work In Progress
High	788	695	677	553	185
Medium	1,765	1593	1,539	1,342	113
Low	363	291	259	138	17
TOTAL	**2,916**	**2,579**	**2,475**	**2,033**	**315**

3.2 The following sets out a further breakdown of the issues related to these outstanding actions.

3.2.1 *High-risk actions*

Of the 553 actions, 96.75% (532 actions) relate to fire doors and compartmentation, 2.89% (16) relate to mechanical and electrical (M&E) works, and 0.36% (5) relates to neighbourhoods, caretaker services, or repairs and maintenance.

3.2.2 *Medium-risk actions*

Of the 1,342 actions, 92.85% (1246) are associated with fire doors and compartmentation, 5.74% (77) relate to M&E works, and 1.41% (19) fall within neighbourhoods, caretaker services, or repairs and maintenance.

3.2.3 *Low-risk actions*

Of the 138 actions, 39.85% (55) relate to fire doors and compartmentation, 41.31% (57) to M&E works, and 18.84% (26) to neighbourhoods, caretaker services, or repairs and maintenance.

Programme of Works

3.3 Additional funding was approved within the Housing Revenue Account (HRA) Capital Programme for 2026/7 and 2027/8 to accelerate the delivery of the replacement of fire doors and upgrading of compartmentation works and an additional contractor has been procured to add capacity to deliver the increased workload.

3.4 The programme of works identifying the sites, order for delivery and associated timescales is included at Appendix 1 for fire door and compartmentation programme also including the number of remedial actions to be delivered within each project. These actions are now being further categorised into High, Medium and Low risk, enabling clearer reporting of planned versus actual delivery through Executive reports and, between formal reporting cycles, through the Council’s internal governance arrangements.

3.5 In line with Fire Risk Assessment guidance, all flat entrance doors must provide adequate fire resistance, be fitted with appropriate ironmongery, and operate correctly, with upgrades undertaken where necessary to achieve FD30S standard, including a self-closing device capable of closing the door from any angle.

Mitigation

3.6 To mitigate risk while outstanding works are completed, a comprehensive suite of measures is in place. Fire Risk Assessments (FRAs) have been completed across the housing stock, with cyclical reviews embedded to ensure ongoing compliance and the early identification of emerging risks. A risk-based prioritisation approach has been applied, with previously designated sheltered schemes, housing elderly and vulnerable residents addressed first, followed by three-storey blocks, reducing exposure in higher-risk settings.

3.7 Alongside the wider fire door and compartmentation replacement programme, Housing Property Services commenced a dedicated fire door inspection programme in September 2025 to address risks identified through FRAs. Inspections confirmed that all flats are fitted with fire doors, generally constructed to the standards applicable at the time of installation, but identified issues including missing or defective door closers and ironmongery. A programme to replace and install these components is underway and is expected to complete by the end of June.

3.8 The caretaking service provides regular attendance to communal areas, including cleaning, removal of combustible materials, and routine testing of fire alarms and emergency lighting, helping to reduce fire load and ensure systems remain operational.

3.9 Full compliance with annual gas safety checks has been achieved, with robust controls in place where access is refused, including capping supplies and triggering tenancy audits. Electrical safety performance is currently 97.23% of properties have an Electrical Inspection Condition Report within a five-year cycle, with remaining properties scheduled for completion, where access is provided. 99.29% of properties have smoke alarms with 100% having, where relevant, carbon monoxide detectors. The remaining properties (39) that do not have a valid electrical test certificate are being prioritised alongside Neighbourhood and Tenancy Officers to undertake Tenancy Audits to gain access to carry out the inspection and test for full compliance. These are typically hard to reach properties.

3.10 An ongoing stock condition survey programme supports long-term investment planning and the identification of emerging building safety risks, while monthly performance meetings across Housing Property Services provide oversight through regular review of landlord Tenant Satisfaction Measure indicators.

3.11 In addition, to further strengthen assurance and discharge our landlord responsibilities, an independent review of fire safety and the effectiveness of the measures being undertaken is being commissioned to validate our approach and inform any further improvements required.

Governance and Reporting Arrangements

3.12 In order to ensure effective management and monitoring of the Housing Improvement Plan (HIP), a new set of governance arrangements has been approved. These arrangements involve quarterly progress reports to the Executive as well as quarterly performance reports for the Housing service. Updates on progress and performance will continue to be provided to the Executive Committee on a quarterly basis.

3.13 To support formal reporting and ensure delivery of actions, a structured governance framework will be established comprising:

- a Housing Strategic Oversight Board that sets the overall strategy and ensures accountability.
- a Housing Improvement Board that monitors progress, manages risks, and evaluates performance.
- a Housing Delivery Group tasked with coordinating the programme at a high level and handling daily operations.

3.14 Following the Regulatory Judgement, and in line with the Regulator of Social Housing's powers under the Social Housing (Regulation) Act 2023, a Provider Improvement Process will be implemented. This is the formal mechanism through which the Regulator may issue a Performance Improvement Plan (PIP) Notice where concerns have been identified through inspection or data. Monthly meetings with the Regulator of Social Housing have been in place since August 2025 to provide assurance that issues are being addressed in a timely and effective manner.

4. FINANCIAL IMPLICATIONS

4.1 Additional funding was approved by the Executive on the 2nd March 2026 within the Housing Revenue Account (HRA) Capital Programme of £2.5m 2026/7 and a further £1.5m in 2027/8 for the Fire Door replacement and compartmentation programme.

4.2 The nature of the Health & Safety works required drives urgency for a high priority review of the 30-year HRA Business Plan that sets out funding and borrowing capacity. The objective of the review is to identify additional headroom for growth, prioritising a faster resolution of the fire safety remedial actions. The outcome of the review and any recommendation arising to enable faster delivery of the fire safety programme will be reported to the Executive in April 2026

5. LEGAL IMPLICATIONS

5.1 Failure to comply with the RSH Consumer Standards is a material breach of social housing under the Housing and Regeneration Act 2008 and Social Housing (Regulation) Act 2023.

6. OTHER - IMPLICATIONS

Local Government Reorganisation

6.1 No direct implications for Local Government Reorganisation have been identified in this report.

Relevant Council Priority

6.2 Community and Housing

- Providing Council Housing that is improved and upgraded through the Housing Capital Investment Programme
- Ensuring the housing stock is clean and safe to live in
- Improve time taken for repairs to be completed
- Maximising funding available to the sector.

Climate Change Implications

6.3 There are no direct implications of issues identified in this report on Climate Change.

Equalities and Diversity Implications

6.4 Through the delivery of Housing Services, the Council identify the needs of individuals and households to tailor services appropriately.

7. RISK MANAGEMENT

7.1 The key risk is failure to ensure properties are well maintained, safe and compliant in accordance with the relevant regulations highlighted through this report.

8. APPENDICES and BACKGROUND PAPERS

Appendix A – Fire Door and Compartmentation Programme.

Appendix A

Block	Number of Actions	Target Completion Date	Quarter	FY
Exhall Cl	160	Jun-26	Q1	2026/27
Mainstone Cl	60	Jun-26	Q1	2026/27
Stoneleigh Hse	14	Jun-26	Q1	2026/27
Doverdale Cl	22	Jun-26	Q1	2026/27
Astley Cl	33	Jun-26	Q1	2026/27
Bentley Cl	0	Jun-26	Q1	2026/27
Lingen Cl	103	Sep-26	Q2	2026/27
Fownhope Cl	135	Sep-26	Q2	2026/27
Cropthorne Cl	19	Sep-26	Q2	2026/27
Batchley Rd Shops	14	Sep-26	Q2	2026/27
Poplar Rd Shops	14	Sep-26	Q2	2026/27
Ombersley Cl	8	Sep-26	Q2	2026/27
Newland Cl	14	Dec-26	Q3	2026/27
Martley Cl	57	Dec-26	Q3	2026/27
Longdon Cl	13	Dec-26	Q3	2026/27
Kempsey Cl	31	Dec-26	Q3	2026/27
Hampton Cl	21	Dec-26	Q3	2026/27
Ibstock Cl	43	Dec-26	Q3	2026/27
Arley Cl	8	Dec-26	Q3	2026/27
Barnwood Cl	10	Dec-26	Q3	2026/27
Flanders Cl	69	Mar-27	Q4	2026/27
Knowle Cl	10	Mar-27	Q4	2026/27
Sandhurst Cl	14	Mar-27	Q4	2026/27
Woodrow Centre	25	Mar-27	Q4	2026/27
Rushock Cl	18	Mar-27	Q4	2026/27
Auxerre House	71	Mar-27	Q4	2026/27
Priors Oak Flats	0	Mar-27	Q4	2026/27
Winyates Centre	4	Mar-27	Q4	2026/27
Garway Cl	22	Jun-27	Q1	2027/28
Felton Cl	52	Jun-27	Q1	2027/28
Haseley Cl	10	Jun-27	Q1	2027/28
Dunchurch Cl	10	Jun-27	Q1	2027/28
Binton Cl	20	Sep-27	Q2	2027/28
Farnborough Cl	14	Sep-27	Q2	2027/28
Bromfield Rd	13	Sep-27	Q2	2027/28
Manor House	10	Sep-27	Q2	2027/28
Eardisley Cl	17	Sep-27	Q2	2027/28
Chedworth Cl	68	Dec-27	Q3	2027/28
Fulbrook Cl	127	Dec-27	Q3	2027/28
Acton Cl	62	Mar-28	Q4	2027/28
Cleeve Cl	62	Mar-28	Q4	2027/28
Deans Cl	76	Mar-28	Q4	2027/28

REDDITCH BOROUGH COUNCIL

Audit, Governance and Standards Committee **23rd July 2026**

Appendix 2

Risk Scoring Matrix

5. Major	5 Medium e	10 Medium e	15 Medium e	20 High	25 High
4. Serious	4 Low	8 Medium e	12 Medium e	16 High	20 High
3. Significant	3 Low	6 Low	9 Medium e	12 Medium e	15 Medium e
2. Minor	2 Low	4 Low	6 Low	8 Medium e	10 Medium e
1. Insignificant	1 Low	2 Low	3 Low	4 Low	5 Medium e
Impact Likelihood	1. Very Unlikely	2. Unlikely	3. Likely	4. Very Likely	5. Almost Certain

IMPACT VALUES (INDICATIVE)

	Service Disruption.	**Reputation**	**H&S - Injury**	**Environmental and Social Impact**	**Cost**
INSIGNIFICANT	Brief disruption of important service area	No interest to local media. Insignificant	No injury	Localised environmental or social impact. Insignificant	Costing less than £1000. 0 - 1 (% of Budget)
MINOR	Significant effect to non-crucial service area; 1 - 2 (Days)	Minor adverse publicity in the local media, no damage to reputation.	Minor injury or discomfort to individual(s).	Short term effect on the environment i.e. noise, fumes etc. no lasting detrimental impact. Minor	Costing less than £5,000 Up to 10% of Budget. 1 - 10 (% of Budget)
SIGNIFICANT	Major effect to an important service area for a short period - Service Disruption 2-3 Days	Some adverse publicity, legal implications. Significant	Severe injury to an individual (s); Severe injury Short term environmental or social impact requiring remedial action. Significant		Costing between £5,000 and £50,000 Up to 25% of Budget. 10 - 25 (% of Budget)
SERIOUS	Loss of an important service area for a period up to 5 days; 3 - 5 (Days)	Long term local reputation damage - National adverse publicity	Major injury to an individual (s)	Long term environmental or social impact. Serious	Costing between £50,000 and £500,000 Up to 50% of Budget. 25 - 50 (% of Budget)

MAJOR	Major loss of services, Unable to function - Service Disruption 5+ Days 5 - 365 (Days).	Adverse and persistent national media coverage - Severe loss of public confidence. Major	Fatality(s)	Long term detrimental impact on the environment/or community. Major	Costing over £500,000 Up to 75% of Budget. 50 - 75 (% of Budget)

LIKELIHOOD VALUES

	Occurrence %:	Probability:
VERY UNLIKELY	0 - 5 (%)	Very low probability / never before.
UNLIKELY	Less than 5-10% chance of occurrence	Has happened rarely/Every 10 years.
LIKELY	10% - 40% chance of occurrence	Only likely to happen 3 or more years.
VERY LIKELY	40% - 75% chance of occurrence	Likely to happen at some point within the next 1-2 years Circumstances occasionally encountered (few times a year).
ALMOST CERTAIN	More than 75% chance of occurrence	Regular occurrence Circumstances frequently encountered –daily/weekly/monthly.