

Report to	Housing Advisory Board
Date	25/06/2025
Agenda No. & Title	Housing Risk Register Review Against RSH Sector Risk Profile 2025
Purpose of the Report	To provide the Housing Advisory Board with an overview of the Housing Risk Register, assess alignment with the Regulator of Social Housing (RSH) Sector Risk Profile 2025, and highlight key areas of assurance, risk, and improvement. The report also identifies priority areas requiring further scrutiny and Board assurance
Status	For information and assurance
Author	Claire Rogan
Report Contact	Cc,rogan@bury.gov.uk
Appendices	Appendix 1: Housing Risk Register Appendix 2: https://assets.publishing.service.gov.uk/media/690a1a19b04a520c50518467/20251106_Sector_Risk_Profile_2025.pdf
Background Documents	RSH Sector Risk Profile 2025
Recommendation/s	<ol style="list-style-type: none"> Note the current Housing Risk Register and overall assurance position Review and discuss key areas of risk where assurance remains limited, particularly data quality, governance, tenant voice, and repairs Consider whether the current level of assurance is sufficient to meet regulatory expectations Endorse the proposed approach to strengthening assurance frameworks, governance, and reporting
Corporate Plan Objective	<ul style="list-style-type: none"> Improve the quality and safety of our homes Improve customer service and increase tenant influence Ensure a sustainable and well-governed housing service Support communities and vulnerable residents
Risk Implications	The report identifies a number of high and medium risks within the Housing

	<p>Risk Register, including:</p> <ul style="list-style-type: none"> • Property safety and compliance risks • Repairs delivery and disrepair claims • Data quality and system assurance • Rent arrears and financial pressures • Governance and oversight arrangements <p>While mitigation is in place, several areas remain high risk, particularly repairs, disrepair, and data-related risks</p>
<p>Mitigations/Controls</p>	<p>A range of mitigating actions and improvement programmes are in place, including:</p> <ul style="list-style-type: none"> • Housing CRM (QL) transformation to improve data quality and reporting • Repairs service transformation and backlog reduction • Workforce training to improve data accuracy and service consistency • Tenant engagement improvements, including TPAS review and tenant scrutiny groups • Strengthened compliance oversight and verification processes • Enhanced data governance and system alignment
<p>Financial and Value for money implications</p>	<p>Risks relating to disrepair, homelessness demand, and rent arrears present potential financial pressures. Effective risk management and mitigation are essential to minimise long-term financial impact.</p>
<p>Regulatory/ governance and legal implications</p>	<p>The report demonstrates alignment with the RSH Sector Risk Profile; however:</p> <ul style="list-style-type: none"> • Assurance in governance, tenant voice, and data remains limited • Evidence of Board-level oversight and effective scrutiny requires strengthening <p>This represents a key regulatory focus for the coming year.</p>
<p>Assets and Liabilities</p>	<p>Risks relating to property safety, compliance, and asset condition could impact the Council's housing stock and associated liabilities if not effectively managed.</p>
<p>Resource</p>	<p>Delivery of mitigating actions and improvement programmes is</p>

<p>Implications</p>	<p>dependent on sufficient capacity and capability. Workforce development and recruitment remain key enablers of improved assurance.</p>
<p>Customer Impact</p>	<p>The risks identified directly impact tenants, particularly in relation to:</p> <ul style="list-style-type: none"> • Repairs and property condition • Safety and compliance • Customer satisfaction and service quality • Support for vulnerable tenants <p>Improving assurance and control effectiveness will lead to better outcomes for tenants.</p>
<p>EDI Implications</p>	<p>This report does not have a negative impact from an EDI perspective</p>
<p>Sustainability and Environmental Implications</p>	<p>There are no sustainability or environmental impacts of this report.</p>
<p>Privacy/Data Protection</p>	<p>The report highlights data quality and information governance as key risk areas, with improvements in place to strengthen compliance and assurance</p>
<p>Colleague Impact</p>	<p>Service improvement and transformation activity will require continued engagement and performance management of colleagues. Training and system improvements are expected to support staff in delivering improved outcomes.</p>
<p>Stakeholder Communications and Reputational Impact</p>	<p>Failure to effectively manage and evidence risk and assurance may impact regulatory confidence and organisational reputation. However, transparent reporting and a clear improvement programme support strong governance and accountability.</p>
<p>Next Steps</p>	<ul style="list-style-type: none"> • Embed Consumer Standards within performance and risk reporting • Improve data quality and system reliability • Enhance Board-level oversight and scrutiny • Monitor delivery of key improvement programmes and risk mitigation actions

1. Purpose of the Report

1.1. This report provides:

- An overview of the Housing Risk Register
- An assessment of alignment with the RSH Sector Risk Profile 2025
- An evaluation of assurance across key risk areas
- Identification of opportunities to strengthen governance, assurance, and regulatory compliance

2. Summary

2.1. The [Sector risk profile](#) is intended to help boards have a better understanding of the risks organisations face, in an increasingly complex and diverse sector. Each year it is updated to reflect the current operating environment. Reviewing the risk register against the profile provides assurance that the service is mitigating and addressing current and emerging risks.

2.2. The Housing Risk Register demonstrates strong alignment with the Sector Risk Profile 2025, particularly in:

- Property safety and compliance
- Homelessness and demand pressures
- Neighbourhood management and safeguarding

2.3. The Council has reasonable assurance over key operational risks, supported by active mitigation and improvement programmes. However, assurance remains limited in:

- Data quality and system reliability
- Governance and Board-level oversight
- Tenant voice and Consumer Standards compliance

2.4. A coordinated improvement programme is in place to address these areas to provide increased assurance.

2.5. The service is stable but transitional, with several high risks improving but not yet fully controlled.

3. Key Themes

- Continued focus on health and safety compliance, including electrical and CDM risks
- Ongoing challenges in repairs delivery, disrepair, and asset management
- Sustained pressure from homelessness demand and temporary accommodation

- Increasing recognition of data quality as a system-wide risk
- Strong operational performance in ASB, safeguarding, and vulnerability
- Reliance on service redesign and transformation/ improvement plans

4. Evidence of Mitigating Controls

4.1. Mitigating controls are proactive or reactive measures designed to reduce the severity, likelihood, or impact of a risk when a threat cannot be fully eliminated. Assurance is currently derived from:

- Performance monitoring at HLT and HAB (repairs, compliance, ASB, complaints, homelessness)
- Operational oversight and service management
- Internal audit and independent validation
- Compliance verification (e.g. safety checks)
- Complaints analysis and Ombudsman learning
- Tenant Satisfaction Measures (TSMs)

Key Mitigating Actions for 2026/27

- 4.2. There are a number of planned actions which once implemented will provide further control and reduce risk further in particular:
- 4.3. System upgrade underway to update QL (CRM) which will significantly improve data quality, reporting, and assurance capability. This will lead to enhanced records management and strengthening data reliability for decision-making.
- 4.4. Workforce Training Programme to support improved system use and data accuracy strengthening operational consistency and control
- 4.5. Full end-to-end review of Repairs Service, repairs data reviewed and cleansed and new ways of working implemented
- 4.6. Independent review of engagement and scrutiny arrangements underway by TPAS Recommendations to strengthen compliance with Consumer Standards. Tenant Review Groups have been established in Complaints, Repairs and ASB to provide targeted tenant scrutiny in areas of lowest satisfaction

5. Summary of the Risk Register

Risk	Title	Current	Target	Trend	Status	Assurance Commentary
H1	Unsafe Homes	High	Medium	Improving	High	Strong controls, assurance dependent on verification of completion
H2	Homelessness	High	Medium	Stable	High	Demand-driven risk, financial pressure ongoing
H3	Tenant Satisfaction	Medium	Medium	Stable	Medium	Linked to repairs and complaints performance
H5	Information Governance	Medium	Low	Stable	Medium	Compliance-focused, assurance gap on data use
H6	Governance	Medium	Low	Improving	Medium	Structures in place, assurance still developing
H8	ASB	Medium	Low	Stable	Medium	Well managed operationally
H9	Vulnerable Tenants	Medium	Low	Stable	Medium	Good focus, workforce dependent
H10	Safeguarding	Medium	Low	Stable	Medium	Controls present, consistency required
H11	Rent Arrears	Medium	Low	Stable	Medium	External economic pressures
H12	Repairs Delivery	High	Medium	Improving	High	Transformation underway, not yet stable
H14	Repairs Data	High	Medium	Improving	High	Data limiting assurance, improvements underway
H19	Disrepair Claims	High	Medium	Increasing	High	Legal and financial risk rising
H25	Disrepair Backlog	High	Medium	Improving	High	Reducing but still material
H35	Data Quality	High	Medium	Improving	High	Key cross-cutting assurance risk

6. Review Against the RSH Sector Risk Profile

SRP Theme	Coverage	Assurance Position
Safety & Quality	Strong	Moderate → Improving
Homelessness Demand	Very strong	Moderate
Repairs & Assets	Strong (transitional)	Limited → Improving
Data & Business Management	Cross-cutting risk	Limited
Governance	Partial	Limited
Tenant Voice	Underdeveloped	Limited
Neighbourhood	Strong	Moderate

7. Highest Risk Areas

- 7.1. Property Safety remains a high-risk area but there is strong alignment with regulatory expectations. However, there is a gap for consistent evidence of completed remediation
- 7.2. Data quality and assurance data quality have been identified as a critical cross-cutting risk, impacting performance, compliance, and governance. The current position reflects limited assurance, although this is improving through the ongoing QL transformation programme
- 7.3. Repairs and disrepair present a significant operational and financial risk and are closely linked to levels of complaints and tenant satisfaction. While performance in this area is improving, it is not yet stable.
- 7.4. Regulatory Compliance and Governance structures have been established however, there is limited evidence to demonstrate robust board-level assurance, effective challenge and scrutiny, and fully integrated Consumer Standards reporting. As such, the overall position is developing but not yet fully effective.

8. Alignment with Consumer Standards

The Risk Register aligns broadly with the four Consumer Standards:

- **Safety and Quality:** H1, H20, H34, H37
- **Transparency, Influence and Accountability:** H3, complaints
- **Tenancy:** H9, H10
- **Neighbourhood and Community:** H8, H9, H10

9. Conclusion

The Housing Risk Register is well aligned with the Sector Risk Profile 2025, with strong coverage of key operational risks.

However, it remains operationally focused and must evolve into an assurance-led framework, demonstrating control effectiveness, evidence of compliance and improved outcomes for tenants.

10. Recommendations to Board

The Board is asked to:

1. Note the current assurance position
2. Consider whether assurance is sufficient, particularly in relation to:
 - Data quality
 - Governance and oversight
 - Tenant voice and accountability
3. Agree the approach to strengthening assurance, for example:
 - Developing a clearer assurance framework
 - Strengthening governance and scrutiny
 - Elevating data as a strategic risk
 - Embedding Consumer Standards in reporting
 - Demonstrating evidence of control effectiveness