



Scrutiny Committee

Thursday 8 October 2015 at 7.00 pm

Boardrooms 3-5 - Brent Civic Centre, Engineers Way,
Wembley, HA9 0FJ

Membership:

Members

Councillors:

Filson (Chair)
Colwill (Vice-Chair)
Daly
Farah
Kelcher
Miller
Stopp
Tatler

Substitute Members

Councillors:

Agha, Hector, Khan, J Mitchell Murray, Nerva,
Ketan Sheth and Thomas

Councillors:

Kansagra and Maurice

Co-opted Members

Ms Christine Cargill
Mr Alloysius Frederick
Dr J Levison
Mr Payam Tamiz
Iram Yaqub
Vacancy

Observers

Ms J Cooper
Ms C Jolinon
Mrs L Gouldbourne
Brent Youth Parliament representatives

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The press and public are welcome to attend this meeting

Agenda

Introductions, if appropriate.

Apologies for absence and clarification of alternate members.

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1 Declarations of interests	
Members are invited to declare at this stage of the meeting, any relevant financial or other interest in the items on this agenda.	
2 Deputations (if any)	
3 Minutes of the previous meeting	1 - 6
4 Matters arising (if any)	
5 Data request log	7 - 10
6 Parking strategy 2015	11 - 76
The parking strategy is attached. A covering report from the Chief Operating Officer covering the background and future development of the strategy will follow.	
7 Complaints annual report 2014-15	77 - 106
This report provides an overview of corporate complaints received by the Council during the period April 2014 to March 2015.	
8 Fly tipping task group scope	107 - 118
9 Scrutiny key comments, recommendations and actions	119 - 136
10 Any other urgent business	
Notice of items to be raised under this heading must be given in writing to the Head of Executive and Member Services or his representative before the meeting in accordance with Standing Order 64.	

Date of the next meeting: Thursday 5 November 2015



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- The meeting room is accessible by lift and seats will be provided for members of the public.

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MINUTES OF THE SCRUTINY COMMITTEE Wednesday 9 September 2015 at 7.00 pm

PRESENT: Councillor Filson (Chair), and Councillors Daly, Farah, Kelcher, Stopp, Miller and Tatler, together with co-opted members Ms Christine Cargill, Mr Alloysius Frederick, Dr J Levison and Mr Payam Tamiz

Also Present: Councillors Butt, Conneely and Pavey

Apologies were received from: Councillor Colwill and appointed observer Lesley Gouldbourne

1. **Introductions**

The following people introduced themselves to the committee and the Chair welcomed their attendance:

Natalie Fox – Borough Director for Brent, CNWL Trust.

Robyn Doran – Chief Operating Officer, CNWL Trust

Dorothy Griffiths – Chair CNWL Trust

Dr Aunpam Kishore Clinical Director

Sarah Mansuralli - Interim Chief Operating Officer, Brent CCG

Julie Pal – Healthwatch Brent

Ian Niven - Healthwatch Brent

2. **Declarations of interests**

Councillor Miller declared a non prejudicial interest in item 5 by virtue of holding the position of Public Affairs Officer for the charity Rethink Mental Illness.

3. **Deputations (if any)**

None received.

4. **Minutes of the previous meeting**

RESOLVED:-

that the minutes of the previous meeting held on 12 August 2015 be approved as an accurate record of the meeting.

5. **Matters arising**

Council's future transport strategy

The Chair reported that the transport strategy had been submitted to Cabinet along with the views of the Scrutiny Committee. The Cabinet had taken a different view on what form the strategy should take and had adopted the strategy as submitted.

6. **Central and North West London NHS Foundation Trust - Care Quality Commission report and action plan**

The committee had before it the report published by the Care Quality Commission (CQC) on the quality of services provided by Central North West London NHS Foundation Trust (CNWL) and the action plan developed to respond to the findings of the inspection.

The committee welcomed to the meeting Natalie Fox (Borough Director for Brent, CNWL Trust), Robyn Doran (Chief Operating Officer, CNWL Trust), Dorothy Griffiths (Chair CNWL Trust), Dr Aunpam Kishore (Clinical Director) and Sarah Mansuralli (Chief Operating Officer, Brent CCG).

Dorothy Griffiths stated that the Trust welcomed the report and recognised the findings of the inspection. On behalf of the Trust, she was proud to point out that it had been graded as outstanding for caring and other areas had been rated as good. However, she recognised that the concern of the committee was over the acute services for adults and core mental health services which had been rated as requiring improvement for which she apologised on behalf of the Trust.

With the aid of a presentation, Natalie Fox informed the committee of the work already undertaken or planned to be done in order to bring standards into line with the recommendations from the inspection. She outlined the 'must do' actions which comprised addressing blind spots on the wards at Park Royal, making sure there were adequate numbers of staff and that they were suitably trained, improving monitoring and record keeping, better bed management, reducing the time patients were moved around, providing private telephone facilities for patients, reducing the risk of AWOLS and ensuring adequate contingency plans. Natalie Fox explained to the committee the actions that had already been taken to address some of the required actions and the plans for ensuring all of them were implemented within an agreed timescale.

In answer to questions from the committee, it was explained that the effect of the financial cuts had not been disproportionately applied to mental health services but they did have an effect on the ability to deliver the service. The Trust was required to achieve a higher level of efficiency and the CCG and Social Care services were working to ensure redesigned pathways did not disadvantage any groups. Sarah Mansuralli stated that the Trust was taking a more transformational approach to delivering mental health services. It was stated that few other Trusts had received outstanding for caring and the majority of them had received a similar level of 'must do' actions.

Questions were asked about the level of absconding and it was reported that during 2013/14 there had been 40 recorded incidents but this had dropped to 26 in 2014/15 and 6 during the first quarter of 2015/16. However there were different classifications for recording patients who had absented themselves and the request was made for figures for all forms of recorded absences since May 2015. This would include the number returned by the police, which it was reported had significantly reduced. Questions were asked about the numbers of restraining incidents, how many took place at Park Royal which was of particular concern and how many were recorded as being supine restraint. Reference was also made to

the use of rapid tranquilisation restraint. The request was made for figures covering June to date to be supplied on the number of restraining incidents, those involving rapid tranquilisation restraint and where they took place.

It was reported that the staff vacancy rate at the time of the inspection stood at 21%. This level remained despite many staff having been recruited because many had also moved on to pursue other opportunities. It was agreed that a better staff retention rate was needed. Vacancies for care co-ordinators were currently running at a high level because of the impending transformation of the service. There were also other vacancies in the health and social care services.

Natalie Fox explained the work with carers that took place to get feedback from them and provide the support needed and she accepted that this was another area where more still needed to be done.

In answer to a question, Robyn Doran undertook supply figures on the length of time between being referred for an appointment and getting the appointment.

It was explained to the committee that monthly meetings with the CQC took place to review implementation of the 'must do' actions and it was expected that this work would be completed by the end of December 2015.

The Chair thanked the Trust officers for facilitating a visit he and Councillor Farah had made to see the work of the Trust which had been very informative and he hoped similar visits could be arranged in the future. The committee thanked all the staff of the Trust for their hard work often in difficult circumstances. Representatives of the Trust were thanked for their attendance. It was agreed that the committee would receive a progress report in six months on implementation of the action plan and compliance with the CQC recommendations. It was also agreed that a report would be submitted in three months on the proposed redesign of mental health services in the context of having to make 20% financial savings.

The committee had requested the following information:

- the number of unauthorised absences occurring since May 2015 broken down by all types
- the number and type of restraining incidents during the previous three months
- How long patients had to wait from being referred to getting an appointment.

7. Scrutiny task group on Access to extended GP services and primary care in Brent

The committee received the report of the task group that had been established to review the primary care element of Brent CCG's transformation programme and assess the extent of the changes and investment made in the Brent GP networks and primary care services. Members of the task group, Councillors Conneely and Hector were also present.

The Chair welcomed to the meeting Ian Niven (Chair, Healthwatch Brent) and Julie Pal (Healthwatch Brent).

Councillor Daly gave the chair of the task group, Councillor Colwill's, apologies that he could not be present to introduce the report. She thanked the officers who had supported the work of the task group. She also thanked the large number of GPs who gave their time to support the work of the task group. Councillor Conneely stated that the task group was very concerned at the wide range and extensive lack of communication at all levels in the health service shown by the task group's finding that almost half of Brent residents were not aware of their access to out of hours services. Councillor Daly added a concern of the task group that whilst GP Access Hubs had been established to provide access to GPs in times of need the hubs had somehow evolved into permanent fixtures without consultation and, it was suggested, without a full equalities impact being carried out on these changes to the primary care offer to residents. Given the way they had been commissioned their coverage of the borough was patchy. The task group had also found a lack of local planning to promote the provision of preventative services. It was recognised that Brent is meeting nationally set targets for health screening but the task group felt that the targets for delivering health screening for older people were not ambitious enough. The task group was concerned that the total number of GPs had reduced and that many were over 65 years of age and may be approaching retirement. The recruitment and retention of district nursing was raised as an issue during the review and the task group were concerned about a lack of planning for the recruitment of additional district nurses. It was felt that given the poor level of communication and awareness of local services, Healthwatch Brent needed to play a more robust role in representing the voice of local residents and take on a stronger advocacy role.

In addressing how the number of those registered with a GP could be higher than the population of the area, it was explained that people could register across borough boundaries and those that moved abroad did not always take themselves off the register. This was a situation governed by legislation and individual GPs decided whether they could continue to deliver care to those that had moved away. Ian Niven acknowledged that Healthwatch Brent had not been as vocal as it should have been during the last two years. The service had been retendered and it was now time to review its role within the resources it had at its disposal. Julie Pal outlined the reconfigured service and expressed confidence in being able to deliver on the recommendations from the task group directed at Healthwatch Brent.

In answering questions from members of the committee the task group members explained that they had not been able to look into the optimum size for a practice but it was clear that there was a range of varied opening hours and gaps in service during lunch hours and Wednesday and Thursday afternoons. It was the decision of the GP on hours of service and the task group had not been able to obtain full information on what out of hours service there was. Members expressed surprise that communication plans were not integral to the delivery of services. Sarah Mansuralli pointed out that the NHS was a very complex organisation comprising a multitude of providers. Everybody needed to work to the same ends and computer systems needed to support this. She agreed that GP hubs had been introduced as pilots and that the time was right to review them. The CCG worked closely with NHS England to meet the primary care needs of local people. She commented that experience had shown that people did not want to see a practice nurse at a GP Access Hub rather than a doctor and that different types of workforce arrangements were being tried.

It was the understanding of the task group members that the CCG would consider the recommendations of the task group and make a formal response. The task group would meet again in six months time to consider the response of the CCG and progress with implementation of their recommendations.

RESOLVED:

- (i) that the recommendations made by the task group be approved and an action plan developed across partner organisations to take them forward;
- (ii) that a progress report on implementation of the recommendations be submitted to the committee in six months time.

8. Terms of reference for task groups on Fly Tipping and CCTV

RESOLVED:

- (i) that the scope, terms of reference and timescale for the task group on CCTV in Brent, as set out in the appendices attached to the report submitted, be agreed.
- (ii) that the scope, terms of reference and timescale for the task group on fly tipping in Brent, as set out in the appendices attached to the report submitted, be agreed.

9. Scrutiny forward plan and key comments, recommendations and actions

The Chair circulated a proposal for a task group on school governance and invited members of the committee to suggest issues to be included in its scope. He asked that any of the co-opted members that wanted to serve on the task group let him know.

The Chair suggested the following further items to be subject to scrutiny:

- school admission policy
- children and young people mental health
- adoption
- the Council's budget setting (to be the work of a task group)
- housing associations
- section 106 and CIL

His aim was for scrutiny to cover all areas of operation of the Council with some topics being cross cutting.

RESOLVED:

that the scrutiny forward plan and the key comments, recommendations and actions be noted.

10. Any other urgent business

None.

The meeting closed at 9.15 pm

D FILSON
Chair

Scrutiny Committee Data Request Log

Date	Data Request	Officer and Organisation	Status
10/02/15	Northwick Park Hospital report about funding to see how patient flow could be improved	Robert Larkman – NWL CCG	Data Received 09/03/15
10/02/15	Bed figures in respect of Central Middlesex Hospital	Robert Larkman – NWL CCG	Data Received 10/03/15
24/03/15	Follow up questions 1. obtain the number of people in each category 2. approximate length of staff in each category on temporary contract	Robert Larkman – NWL CCG	DRIW
10/02/15	Data on the LNWHNT's agency and bank staff and what is the difference between the two	Professor Ursula Gallagher – NWL CCG	Data Received 24/03/15
10/02/15	Winter Resilience	Sarah Mansuralli	SDRIW
11/03/15	Phone Call Stats	Margaret Read	Data Received 01/04/15
11/03/15	Signed Non disclosure	Jon Lloyd Owen	DRIW (Update Received 21/3/15)
16/06/15	A copy of the data modelling which was used by Shaping a Healthier Future	Sarah Mansuralli CCG	Data Received 29/06/15
16/06/15	Members request that Rob Larkman (Accountable Officer - CCG) provide further details of the financial costs set out in the table at para 2.2 regarding how the same level of paediatric service would be achieved within reduced costs.	Rob Larkman	Data Received 29/06/15
16/06/15	Members requests that the financial return for Public Health expenditure made to the Department of Health is also circulated to scrutiny.	Melanie Smith Brent Public Health	Data Received 28/08/15
16/06/15	Members asked for a detailed breakdown of the numbers of people offered and accepting a health check update by GP practice	Melanie Smith Brent Public Health	Data Received 26/06/15
16/06/15	It was requested that a breakdown of the drugs and alcohol budget with numbers of patients in treatment by type of treatment is provided to the committee. This should include the indicative figures for the range of spend per patient for different types of treatment packages.	Melanie Smith Brent Public Health	Data Received 26/06/15

Follow up Question 16/06/15	The number of people who have been helped to stop smoking by GP practice.	Melanie Smith Brent Public Health	Data Received 14/08/15
Follow up Question 16/06/15	Cost of substance misuse - range of cost of packages across all the categories' of service. In response to Cllr Filson's subsequent query, we cannot provide information on a cost per case basis as we do not contract on this basis.	Melanie Smith Brent Public Health	Data Requested (20/07/15) Unable to provide Data Updated Cllr Filson, (22/07/15)
16/06/15	Members requested further information on the use of discretionary housing payments to support childcare costs for people moving into employment who have been affected by changes in welfare benefit payments.	Gail Tolley – Brent Children & Young People Sue Gates & Sasi Srinivasan	Data Received 23/06/15
16/06/15	Update of work undertaken to assess the impact of support given to parents to access employment.	Gail Tolley – Brent Children & Young People Sue Gates & Sasi Srinivasan	Data Received 23/06/15
14/07/15	A paper regarding Policy of High Value property to be sold, as a result of central government policy change.	Jon Lloyd-Owen – Brent Housing	Data Requested (20/07/15) Update Provided (20/07/15)
14/07/15	1% Reduction in rent (£10 Mil) - Model is available to members and ongoing member involvement.	Jon Lloyd-Owen – Brent Housing	Data Requested (20/07/15) Update Provided (20/07/15)
14/07/15	Cost of Leaseholder Management System	Tom Bremner & Peta Caine - BHP	Data Received 14/08/15
14/07/15	Management Service Charge – Total sum for last financial Year	Tom Bremner & Peta Caine - BHP	Data Received 14/08/15
14/07/15	Details of the number of tribunal's successfully challenged	Tom Bremner & Peta Caine - BHP	Data Received 14/08/15
14/07/15	Case studies for collecting rent/financial inclusion – where this worked well and lessons learnt	Tom Bremner & Peta Caine - BHP	Data Received 14/08/15
14/07/15	Cost of possession orders – Total figures passed onto tenants	Tom Bremner & Peta Caine - BHP	Data Received 14/08/15

14/07/15	No of major voids – How much rent was lost (1%) please provide the actual figure (£)	Tom Bremner & Peta Caine - BHP	Data Received 14/08/15
14/07/15	The no. of Anti Social Behaviour (ASB) cases for this year	Tom Bremner & Peta Caine - BHP	Data Received 14/08/15
17/07/15	Letter from Joanne Drew Chair of BHP Board to the Chair of Scrutiny Committee	Joanne Drew Chair of BHP Board	Data Received 17/08/15
12/08/15	Transport Budget for the last 5 years	Tony Kennedy – Brent Transport	Data Requested (13/08/15) Data Re requested (28/08/15)
12/08/15	Car Clubs (Zip Car) Brent usage: 1. Demographical Stats 2. Location Stats (North, South, East & West of the borough)	Tony Kennedy – Brent Transport	Data Requested (13/08/15) Data Re requested (28/08/15)
12/08/15	Stats and trends for General Car usage in Brent	Tony Kennedy – Brent Transport	Data Requested (13/08/15) Data Re requested (28/08/15)
12/08/15	What is the cost of the consultation for the Freight Strategy	Tony Kennedy – Brent Transport	Data Requested (13/08/15) Data Re requested (28/08/15)
12/08/15	Stats on Speeding prosecutions (over 20 mph and over 30mph)	Tony Kennedy – Brent Transport	Data Requested (13/08/15) Data Re requested (28/08/15)
12/08/15	When did Brent Council express its support for the Heathrow Expansion and in what terms	Tony Kennedy – Brent Transport	Data Requested (13/08/15) Data Re requested (28/08/15)
12/08/15	Stats on Brent's Air Quality	Tony Kennedy – Brent Transport	Data Requested (13/08/15) Data Re requested (28/08/15)
09/09/15	The request was made for figures covering June to date to be	Natalie Fox – Borough Director	Data Received 24/09/15

	supplied on the number of restraining incidents, those involving rapid tranquilisation restraint and where they took place.	for Brent, CNWL Trust.	
09/09/15	The number of unauthorised absences occurring since May 2015 broken down by all types	Natalie Fox – Borough Director for Brent, CNWL Trust.	Data Received 24/09/15
09/09/15	The number and type of restraining incidents during the previous three months	Natalie Fox – Borough Director for Brent, CNWL Trust.	Data Received 24/09/15
09/09/15	How long young patients had to wait from being referred to getting an appointment (mental health).	Natalie Fox – Borough Director for Brent, CNWL Trust.	Data Received 24/09/15
09/09/15	No of children referred with Attention Deficit Hyperactivity Disorder (ADHD).	Natalie Fox – Borough Director for Brent, CNWL Trust.	Data Received 24/09/15

Key: Data Requested At Meeting (DRAM)
Data Requested In Writing (DRIW)
Second Data Request in Writing (SDRIW)
Data Not Received (DNR)
Data Received (DR)



London Borough of Brent
Parking Strategy 2015

Prepared by:

Iain Forbes
Eurlng BSc CEng MICE MCIHT
Chartered Civil Engineer
Transport Planner



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Appendices

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Appendix 2 - Parking Permit Terms and Conditions
Appendix 3 - Criteria for Personalised Disabled Persons' Parking Places
Appendix 4 - Council-run car parks in Brent
Appendix 5 - Privately run car parks in Brent
Appendix 6 - London Councils' Standard PCN Codes

1. Introduction

- 1.1 Good parking management is an important tool that can contribute towards achieving the Council's wider transport, economic and planning policy objectives. Well thought-out parking policies and effective enforcement can influence travel patterns, sustain the local economy, balance competing demands for road space, relieve congestion and contribute to sustainable outcomes.
- 1.2 Conversely, parking which is not properly regulated can exacerbate congestion on the road network, reduce the reliability of public transport, impact adversely on the local economy and create road safety problems. Parking services are highly visible to residents, local businesses and visitors. In particular, enforcement needs to be seen as fair, effective and proportionate if it is to retain public confidence.
- 1.3 Demand for parking in the London Borough of Brent is high. Over time the Council has introduced a number of measures to control the demand for kerb space. Parking in the south-eastern part of the borough, which is closest to central London, is regulated through Controlled Parking Zones where residents have the option of purchasing resident permits. Other parts of the borough also have parking controls, typically in and around busy high street locations, or near railway stations where there may be a demand for parking from commuters.
- 1.4 Another key feature is the presence of Wembley Stadium. On major event days the local area receives an extremely high number of visitors, placing significant pressure on local parking, and for this reason, the area surrounding the stadium also has parking controls to protect parking for local residents and businesses.
- 1.5 This Parking Strategy has been prepared to meet a key commitment made in the Council's Long Term Transport Strategy:

A Parking Strategy will be developed by Parking Services during the 2015/16 period. This Strategy will seek to analyse the current situation regarding parking in Brent and identify problems and opportunities for improvement. The Strategy will seek to achieve a balance between the needs of residents to park, access to local employment and local retail and service providers, and the need to reduce trips by conventional cars throughout the borough.
- 1.6 Accordingly, this Strategy outlines the Council's parking policy as well as providing local solutions for parking problems in the area. It sets out how parking issues are currently dealt with, identifies the priorities for enforcement and for future investment, and sets a framework from which the service can be developed. This Strategy builds on existing best practice undertaken within the borough and refines it to meet the current and emerging challenges.
- 1.7 This Strategy replaces the Council's former Parking and Enforcement Plan, adopted in 2006.

2. The Parking Strategy in Context

- 2.1 Brent is an Outer London borough, with a population of 311,200 according to the 2011 census, making it the fifth most populous borough in London. The borough covers an area of 4,325 hectares - almost 17 square miles - between inner and outer North West London. It extends from Burnt Oak, Kenton and Kingsbury in the North, to Harlesden, Queen's Park and Kilburn in the South. Brent is bordered by the London Boroughs of Barnet to the east, Harrow to the north and Ealing to the west. It has short boundaries with the inner London boroughs of Camden, Westminster, Hammersmith and Fulham, and Kensington and Chelsea in the south.
- 2.2 The North Circular Road divides the less densely populated northern part of the borough from the more densely developed south. In the north of the borough, in areas such as Kenton and Kingsbury, a higher proportion of the population is retired, and cycling is used for less than 1% of all journeys. Conversely, in southern areas such as Brondesbury and Queens Park, cycling rates are much higher at 7-11%.
- 2.3 Brent is the most ethnically diverse place in Britain, with more than 120 languages spoken. The borough is home to the iconic Wembley Stadium, Wembley Arena and the Swaminarayan Hindu Temple in Neasden, and is accustomed to the successful staging of many major events. This means that Brent is the destination for thousands of British and international visitors every year. Fortunately, it is served by some of the best road and rail transport links in London, with 26 rail, Overground and tube stations, and several others just beyond the borough boundary.
- 2.4 Despite these strengths Brent is ranked amongst the top 15 per cent most deprived areas in the country. This deprivation is characterised by high levels of long-term unemployment, low average incomes and a reliance on benefits and social housing. Children and young people are particularly affected with a third of children in Brent living in a low income household and a fifth in a single-adult household. Living in poverty generally contributes to lower educational attainment, poorer health and wellbeing, and social isolation.
- 2.5 Despite its large population, Brent does not have a metropolitan-scale shopping centre, and many of the shopping and leisure demands of a large number of Brent residents are currently met by the Metropolitan Centres (as defined by the London Plan) of Harrow, Ealing and Shepherd's Bush, together with Brent Cross regional shopping centre, all of which are outside the borough.
- 2.6 Brent's largest centre, Wembley, is classified by the London Plan as a Major Centre. Wembley is also classified as an Opportunity Area, defined as having "significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility". It is also identified as a Potential Outer London Development Centre in the leisure / tourism / arts / culture / sports category.

2.7 The London Plan identifies six District Centres which lie wholly within Brent, and two which lie partly in Brent and partly in the London Borough of Harrow:

- Ealing Road
- Harlesden
- Neasden
- Kenton (also Harrow)
- Preston Road
- Wembley Park
- Willesden Green
- Kingsbury (also Harrow)

In addition, the Council's Local Development Framework (LDF) Core Strategy, adopted in 2010, identifies a further Major Centre and three additional District Centres which lie partly in other boroughs. These are:

- Kilburn (Major Centre - also Camden)
- Burnt Oak (also Barnet)
- Colindale (also Barnet)
- Cricklewood (also Barnet & Camden)

2.8 Park Royal, which lies partly in Brent and partly in Ealing, is classified by the London Plan as an Opportunity Area. On 1st April 2015, the Old Oak and Park Royal Development Corporation came into existence. The Development Corporation is the planning authority for its area.

2.9 Wembley and Park Royal are the major employment centres in the borough. The GLA's Further Alterations to the London Plan (2014) suggests that Brent will experience employment growth of 23.2 % between 2011 and 2036, the eighth highest employment growth of the 33 London authorities. It is also forecast that, in the same period, the borough's population will grow by 20%.

2.10 The LDF identifies five growth areas in the borough:

- Wembley
- South Kilburn
- Church End
- Burnt Oak & Colindale
- Alperton

Within these five growth areas, Wembley will be the preferred destination for town centre uses including new retail growth, office development, and new hotels. In the other four growth areas, mixed use development will be encouraged in accordance with a series of more detailed place-making policies appropriate to each area. These five areas will also be the location of nearly 90% of the 21,000 new housing units forecast to be built in the borough by 2026.

2.11 These potential changes will inevitably lead to increased demand for movement to, from and within the borough, with particular focus on the areas identified for growth. While the availability, frequency and reliability of public transport, and the existence of high quality facilities for walking and cycling will influence the way people travel, there will nevertheless be an unavoidable impact on loading, deliveries and parking.

2.12 The main demand for both on-street and off street parking in the borough's town centres occurs from Monday to Saturday across the working day between 8am and 6:30pm, on Sundays during the retailing hours of 10am to 5pm, and during special events, particularly in the Wembley area. The majority of drivers seeking long-stay

parking in the Borough, for which there is heavy demand, are likely to be commuters who travel at peak periods when traffic levels are at their highest. Conversely, many drivers seeking short stay parking are more likely to be shoppers, most of whom tend to avoid travelling in peak periods.

Car ownership

- 2.13 The 2011 Census indicated that car ownership in Brent is slightly below the London average, ranking 19th out of the 33 London authorities. Of the Outer London boroughs, only Haringey and Newham have fewer households with access to a car. As the table below shows, the proportion of households with access to a car fell between 2001 and 2011, and is now similar to the pattern that existed in 1991.

Table: Household car ownership in Brent

No. of cars/ vans per household	1991		2001		2011	
	No. of h/h	%	No. of h/h	%	No. of h/h	%
0 (car-free)	40,756	43.4	37,287	37.3	47,417	43.0
1	38,153	40.6	42,606	42.6	43,598	39.5
2	12,705	13.5	16,207	16.2	14,884	13.5
3+	2,350	2.5	3,891	3.9	4,385	4.0
Total Households	93,964	100	99,991	100	110,286	100

Car use

- 2.14 The 2011 London Travel Demand Survey indicates that, between 2005/06 and 2009/10, residents of Brent made an average of 3.1 trips each day, the eleventh highest rate of the 33 London authorities and slightly higher than the averages for both Outer London and Greater London as a whole (both 2.2 trips per day). 44% of these trips by Brent residents were made by car or motorcycle. This is a higher percentage than any Inner London borough, but is the sixth lowest of the 19 Outer London boroughs.
- 2.15 Use of buses in Brent is equal second highest in Outer London (16% of trips) and use of the Underground is also equal second highest in Outer London (7% of trips). Walking accounts for 29% of trips and cycling 1%.
- 2.16 Although the proportion of households without access to a car has risen (see above), the continuing increases in population, together with the forecast increases in employment, will generate additional demand for parking in the borough.
- 2.17 14.5% of the population (2011 Census) are people over 60 who have access to free travel on public transport, either through the Freedom Pass (which is available from the state retirement age) or the London-only 60+ Oyster Photocard (which is available from age 60). A higher proportion of older people live in areas in the north of the borough that are less well served by public transport. In addition, this group is likely to have more health problems than younger members of the community. Thus the availability of free transport is to a degree offset by a higher likelihood of using a car as a first choice for travel.

Parking policies

2.18 The Council's parking policies must comply with the law (particularly the Traffic Management Act 2004); and have regard to the Secretary of State's Statutory Guidance to Local Authorities on the Civil Enforcement of Parking Contraventions, the latest version of which was issued in April 2015. This Guidance states that enforcement authorities should design their parking policies with particular regard to:

- managing the traffic network to ensure expeditious movement of traffic, (including pedestrians and cyclists);
- improving road safety;
- improving the local environment;
- improving the quality and accessibility of public transport;
- meeting the needs of people with disabilities, some of whom will be unable to use public transport and depend entirely on the use of a car; and
- managing and reconciling the competing demands for kerb space.

2.19 The Council's parking policies also sit within the context of the Council's overall transport policies. These are set out in the Council's 2015 Long Term Transport Strategy (LTTS). The LTTS sets out five objectives, all of which are relevant to this Parking Strategy:

Objective 1

Increase the uptake of sustainable modes, in particular active modes

Increasing the uptake of cycling and walking will actively contribute to a reduction in congestion and air pollution and improve the health of Brent residents. Use of public transport or car clubs instead of the private car also contributes to reduced congestion and is important in enabling access to services. Uptake of all these modes can be influenced by effective travel planning measures and infrastructure.

Objective 2

Reduce conventional vehicular trips on the network, particularly at peak time

This is not about reducing the total number of trips on the network as mobility is highly important for local economic growth. However, trips can be re-timed to avoid peak hours or take place in less polluting vehicles.

Objective 3

Support growth areas and town centres to enable acceptable development

Brent is expected to see high levels of growth over the next 20 to 30 years, focussing on the growth areas. Adequate transport investment will be required to ensure this development takes place on a sustainable basis and does not place undue pressure on the transport networks.

Objective 4

Reduce KSI* incidents and slight accidents on Brent's roads

Over the last 10 years roads in Brent have become safer, however there is still considerable amounts of work to do in further reducing accidents to create safe and accessible streets for all users.

*Killed and seriously injured

Objective 5

Reduce the exposure of Brent residents to PM and NO2 generated by the transport network

It has become apparent that particulate matter and nitrogen dioxide generated by a variety of sources has a significant adverse impact on the health of those who are regularly exposed. A proportion of these pollutants are generated by transport. Reduction in exposure of Brent residents could result in significant health benefits.

2.20 The LTTS also sets five priority areas that will provide a focus for further work. These are:

- Road safety;
- Air Quality;
- Health;
- Congestion; and
- Growth and regeneration.

2.21 Both the **Mayor's Transport Strategy** (May 2010) and the **London Plan** (July 2011) contain London-wide policies on parking, to which the Council must have regard. In particular, the London Plan sets out a framework of standards for the provision of off-street parking in new developments, including standards for cycle parking, disabled parking, and the provision of parking for electric vehicles. These issues are considered separately in this Strategy.

Other relevant policies

2.22 The **Local Development Framework (LDF)** is the Council's main planning policy document. The LDF Core Strategy was published in July 2010 and, as required by legislation, was subject to a Sustainability Appraisal of its policies. The LDF's Strategic Objective 8 deals with Transport Infrastructure as follows:

Strategic Objective 8

Reducing the Need to Travel and Improved Transport Choices – by:

- Completing first class retail and other facilities in Wembley that reduces the need to travel to other centres.
- Improving key transport interchanges of Wembley, Alperton, First Central and Queen's Park.
- Promoting access by public transport, bicycle or on foot and reducing car parking standards for growth areas because of their relative accessibility.
- Reducing modal share of car trips to Wembley from 37% towards 25%.
- Completing at least 5 car-free schemes per annum in the Plan period.

2.23 The Core Strategy Sustainability Appraisal adopted a number of additional objectives:

- | | |
|-----|--|
| S7 | To improve accessibility to key services especially for those most in need |
| EN1 | To reduce the effect of traffic on the environment |
| EN3 | To improve air quality |
| EN7 | To reduce contributions to climate change and reduce vulnerability to climate change |
| EC5 | To encourage efficient patterns of movement in support of economic growth |

2.24 The **Wembley Area Action Plan** (WAAP), published in January 2015, includes transport and parking policies intended to support the planned development and expansion of the Wembley area. Specifically in relation to parking, the WAAP sets out proposals for new car parks on the edge of the town centre, including coach parking, and also adopts parking standards for new developments in Wembley.

2.25 The Council's 2006 **Parking and Enforcement Plan**, which this Parking Strategy replaces, set out a priority hierarchy for on-street parking as follows:

- Local disabled resident parking need *
 - Non-local disabled parking need *
 - Local resident parking need*
 - Essential worker in the delivery of public service
 - Local business operational parking/servicing need
 - Short-stay shopper/visitor parking need
 - Long-stay shopper/visitor parking need
 - Long-stay commuter parking need
- * Includes residents' additional parking requirements for visitors and tradespeople (e.g. builders) who may require operational parking all day.

This priority hierarchy has been specifically referred to by the Council when considering amendments to parking charges since 2006, and will continue to be taken into account when assessing parking need.

2.26 Finally, the Council's 2014/15 Parking Report states that Brent is committed to providing a fair, consistent and transparent approach to parking and traffic enforcement. Publishing clear statistical and financial information will help achieve these objectives.

The Council's objectives for the parking service

2.27 In the light of the above, the Council has adopted the objectives listed below for the operation and development of its parking service.

Policy objectives

The Council seeks:

- To improve the safety of all road users.
- To provide affordable parking spaces in appropriate locations to promote and serve the needs of the local economy.
- To assist in providing a choice of travel mode and enable motorists to switch from unnecessary car journeys, to reduce traffic congestion, carbon emissions and pollution.
- To promote carbon reduction and improved air quality by encouraging the use of vehicles with lower emission levels
- To support local businesses by facilitating effective loading and unloading, and providing allocated parking where appropriate.
- To provide the right balance between long, medium and short stay spaces in particular locations
- To achieve a turnover of available parking space in shopping and commercial areas, to maximise business activity and promote economic growth
- To assist the smooth flow of traffic and reduce traffic congestion.
- To enable residents to park near their homes.
- To facilitate visitor parking, especially by those visiting residents with personal care needs.
- To assist disabled people with their parking needs, and enhance their access to local shops and key amenities
- To prioritise parking controls to support the needs of local residents and businesses over event traffic.

Operational objectives

The Council aims:

- To set a level of charges which balances demand and supply for parking spaces across the borough.
- To provide an efficient service which constantly seeks to improve.
- To be fair, consistent and transparent in our dealings with customers.
- To publish clear statistical and financial information on a regular basis.

3. Brent's Parking Policies in Action

3.1 The Council's overall approach to parking and enforcement is to work with residents and other stakeholders, to identify local problems and develop appropriate and proportional local solutions which support and complement the Council's wider policies and strategies. These solutions include:

- the prohibition of parking where this would compromise safety and the free flow of traffic;
- using parking controls to manage the demand for kerbside parking space;
- providing convenient on-street parking for residents, visitors and businesses;
- providing off-street parking (car parks) in areas where demand is greater than can reasonably be accommodated at the kerbside;
- ensuring that new developments provide sufficient parking to avoid adding to the demand for parking on the street; and
- adopting approaches such as car clubs and car-free development that reduce the demand for parking space and encourage the use of more sustainable forms of transport.

Waiting restrictions (red and yellow lines)

3.2 The majority of yellow-line waiting restrictions in Brent are on strategic and distributor roads and have been introduced largely to promote safety, assist buses, enable servicing and aid efficient movement of traffic. Where practicable, short-stay parking bays are also provided on these roads. Red-line waiting restrictions on the Transport for London Road Network (TLRN) are the responsibility of TfL, but aim to meet similar objectives on London's busiest roads.

3.3 Elsewhere, waiting restrictions have been introduced to remove obstructive or unsafe parking at locations such as close to junctions, on bends, outside schools and where the visibility of other motorists is obstructed. Special arrangements apply to protect residents' parking when events take place, especially in the Wembley area. In addition, restrictions are often placed in narrow streets, where parking would otherwise take place on both sides, to assist the emergency services in obtaining access.

3.4 Waiting restrictions across the borough apply for a number of different time bands; many restrictions were introduced several years ago covering a standard working day from 8.00 or 8.30am to 6.30pm. Over the last 20 years the borough has seen increased traffic flows and congestion, more flexible working arrangements and the growth of evening and Sunday trading. As a result, peak traffic periods have spread and the peak times for parking demand have changed.

3.5 To address this process of change, the Council reviews restriction time bands as part of a wider process by which waiting restrictions are regularly reviewed and amended in order to improve safety, continue meeting local needs, and rationalise provision in order to reduce ambiguity or confusion for drivers.

- 3.6 The Council sees the introduction of restrictions into residential streets as a last resort. This only takes place where safety is compromised by dangerous or obstructive parking, or where the bulk of the demand for kerbside parking is from people from outside the local area and is detrimental to residential and community activities.
- 3.7 The views of residents and other frontagers are always taken into account in deciding whether controls should be introduced.

Legal powers

- 3.8 The Council is empowered by the Road Traffic Regulation Act 1984 (as amended), the Traffic Management Act 2004, and other specific legislation to provide parking places on and off the highway, to charge for their use, and to carry out enforcement activities. The Greater London Council (General Powers) Act 1974 (as amended) bans footway parking in London.

On-street parking

- 3.9 A survey in 2014 indicated that there were approximately 88,000 on-street parking places, both controlled and uncontrolled, available across the whole of Brent. Over large areas of the borough, particularly in the north and west, on-street parking remains available to motorists free of charge or restriction. In these areas, there are only limited lengths of kerbside waiting and loading restrictions in place on-street, including those necessary to ensure road safety.
- 3.10 In areas of parking control, residents can purchase electronic vouchers to enable their visitors to park. Elsewhere, ad hoc on-street visitor parking is managed by the use of Pay and Display (P&D) bays, which normally require a valid ticket or permit to be displayed in the windscreen of the vehicle parked in a defined bay. Pay and Display machines are located near shops and businesses within areas of controlled parking across the borough. Payment by mobile phone, which does not require a permit to be displayed, is also possible and is an increasingly popular method of payment.
- 3.11 As the use of telephone (cashless) parking increases the number of P&D machines is likely to be reduced, while still maintaining an option to pay with cash except in specific designated areas suitable for commuter parking. A mobile application (app) is available which increases the convenience of cashless parking, for example by sending text reminders when parking sessions are due to expire.
- 3.12 The main areas of parking control also have bays reserved for local residents, or bays shared between residents and paying visitors. In some places there are also bays reserved for motorcycles, businesses, disabled people, doctors, car club vehicles and loading.

3.13 Current shopping and business opening hours mean that in some areas there can be similar, and sometimes higher, levels of parking on Sundays and Bank Holidays than on normal weekdays or Saturdays. For this reason, parking controls apply on Sundays in a small number of locations as follows:

Zone	Location
E	Ealing Road
KR	Kensal Green (part zone only)
T	Brentfield Road
W	Wembley Hill

Parking controls also operate on Bank Holidays in some busier areas. There is no enforcement on Christmas Day. However there is Bank Holiday enforcement on Boxing Day in the four zones listed above, plus zones KG (Kilburn Lane) and KM (Malvern Road).

Controlled Parking Zones

3.14 There are 42 formal Controlled Parking Zones (CPZs) in the borough as well as other areas where some controlled parking operates without there being a formal CPZ. The distinguishing feature of a formal CPZ is that the hours of operation of the restrictions are displayed on signs at the entrances to the area. The hours of control that apply to single yellow lines and to permitted parking bays are usually the same, and it is not necessary to provide signs at each separate length of yellow line.

3.15 The main exceptions to the uniform time restriction within a CPZ are double yellow lines, which prohibit parking “at any time” (i.e. 24 hours a day, every day) and do not require signs in addition to the lines themselves. Any other exceptions have to be specifically signed as having different hours of control to the general hours of the scheme in question.

3.16 A full list of CPZs and their hours of operation is contained in Appendix 1.

Parking permits

3.17 The Council issues a range of parking permits which enable the permit holder to park on-street in a bay designated for a particular type of user. The most common types of permit are for residents, residents’ visitors and businesses. Permits are of two general types: those which allow the holder to park in a bay reserved only for that type of permit holder (such as resident’s permit within a particular zone), and those which allow the user to park in a range of different bays (such as an Essential User Permit during operational hours). The Council launched a new on-line parking permit system in 2012/ 2013, and it became fully operational in 2013/2014.

3.18 A permit does not guarantee the holder a dedicated space outside an individual address, nor is it a guarantee that there will be sufficient kerbside parking space available to cater for all those who may have permits to park in any particular road or zone at any one point in time.

3.19 Permits are subject to terms and conditions which can be found at Appendix 2 and on the Council’s website. These conditions include a limit on the size of a vehicle for

which a permit may be obtained, and also on the number of permits which may be obtained under particular circumstances.

Residents' permits

3.20 The Council will issue a resident's permit on request to those people who:

- have a permanent address within a permit parking area and are able to provide evidence of this;
- prove that they are the keeper of the vehicle for which the permit is sought by providing details of ownership or a leasing agreement;
- agree to meet the terms and conditions shown at Appendix 2; and
- pay the applicable fee.

Applications are made online, and the validity of the resident's address and the vehicle details are checked electronically.

3.21 The maximum number of residents' permits that can be purchased per household is three. Non-residents are not eligible for a Resident's Parking Permit.

3.22 The resident permit enables the holder to park in any resident bay, and Shared Use (Resident/Pay & Display) bays within the Zone shown on the permit. However, a permit does not give the holder the right to a parking space immediately outside their home or in their own street, nor does it guarantee the availability of a parking space. Neither does it allow the holder to park in bays reserved for other classes of vehicle, such as doctors' bays or car club bays.

3.23 Permits are only available in respect of vehicles which do not exceed a maximum length of 6.5m, a maximum height of 2.5m and a maximum weight of 5 tonnes.

3.24 Residents' parking permits are priced according to vehicle emissions and the number of vehicles in a household. The Council has established seven Vehicle Bands as set out in the table below. The least environmentally damaging vehicles may park free of charge. (This currently applies to a vehicle in Band 1 which is the first or only vehicle in the household to receive a permit.) Residents have the option of purchasing annual, six month, or three month permits.

Brent Vehicle Band	1	2	3	4	5	6	7
Vehicle Emissions (gCO ₂ /km) of passenger vehicles registered on or after the 1st March 2001	Less than 110	110 to 130	131 to 150	151 to 175	176 to 200	201 to 255	Over 255
Cylinder capacity of engine (cc) of passenger vehicles registered before 1st March 2001 and goods carrying vehicles	Less than 1101	1101 to 1200	1201 to 1550	1551 to 1800	1801 to 2400	2401 to 3000	Over 3000

3.25 The charge for the second permit in a household is higher than the charge for the first, and the charge for a third and final permit is higher than the charge for the second permit.

Shared use parking

3.26 In order to allow short stay parking for visitors in predominantly residential areas, some bays have been designated as “shared use”. Shared use bays are available for use both by resident permit holders and by the public as pay and display bays. This allows visitors to the area to make use of the parking space vacated by residents who take their cars out of the area during the day.

Visitor permits

3.27 Residents who live in a controlled parking zone may purchase permits for use by their visitors, removing the need for a visitor to find a paid-for on- or off-street parking space. There are five specific options:

- annual visitor household permits;
- daily visitor parking;
- Temple (T) zone visitor permit;
- Wembley Hill (W) and Ealing Road (E) zone visitor permits (6.30pm to 9pm); and
- event day visitor permits.

3.28 An **annual visitor household permit** is a paper permit which displays the name of the resident’s street. It allows visitors to park in any resident or shared use bay, only in the named street (or part of the street) within the zone shown on the permit. The permit may be displayed on any vehicle. Each household may only hold one annual visitor household permit.

3.29 All visitor household permits are charged at a flat rate, and do not depend on the resident having a car for their own use.

3.30 **Daily visitor parking permits** require residents to set up a parking account, following which visitor permits can be booked online by telephone or by text. Residents must purchase a minimum of ten credits at a time, with each credit giving one day’s parking for one vehicle. Each credit is activated by providing the Council with the relevant date and the visitor's vehicle registration number.

3.31 The resident is issued with a voucher reference number and Civil Enforcement Officers will then have immediate access to the voucher information on their hand-held devices. There is nothing to display on the vehicle. Once a visitor parking session has been booked it cannot be cancelled.

3.32 Controlled Parking Zone T (Temple) has 24-hour parking controls, while Zones W (Wembley Hill) and E (Ealing Road) have controls that extend from 8 am to 9 pm every day including bank holidays. Special visitor permit schemes have been introduced to allow residents of these zones to receive visitors outside the hours of peak parking demand.

3.33 The **Temple Zone visitor permit** allows residents' visitors to park between 6.30pm and 8am every day. Only one Temple Zone visitor permit can be purchased per eligible household.

- 3.34 The **W and E zone visitor permit** allows residents' visitors within zones W and E to park between 6.30pm and 9pm and all day Sunday. Only one W or E zone visitor permit can be purchased per eligible household.
- 3.35 **Event day visitor permits** are discussed in the section on Wembley Event Day Parking.
- 3.36 Residents of private roads are not entitled to visitor permits.

Temporary courtesy permit

- 3.37 Temporary courtesy permits are issued with a one month duration. A small fee is payable and the cost is not emissions-based. Typically the circumstances in which a courtesy permit is issued are:
- the applicant has just moved into Brent and cannot yet authenticate their new address;
 - to cover a short period between buying a new vehicle and selling the old one; or
 - the annual permit has expired and the resident is moving out of Brent in less than three months.

Replacement vehicle permit

- 3.38 Replacement vehicle permits are available to existing permit holders whose normal vehicle is unavailable and who are temporarily using another vehicle. They are typically used by permit holders who have use of a garage courtesy car. There is a charge for the issue of a replacement permit.

Business permits

- 3.39 Business permits are available on request to local firms who are able to apply for up to a maximum of three permits per business, for each zone in which the business has premises. This is subject to providing the necessary proof of entitlement. The permit allows the vehicle to which it is attached to park in any resident bay within the same CPZ without restriction. The permit does not exempt the vehicle from any other restrictions, so business permit holders still have to pay if they park in a Pay and Display bay, and they may not park in other reserved bays such as disabled bays (unless the driver or passenger is using a Blue Badge), car club bays, doctors' bays, etc.
- 3.40 Business permits are specific to a named CPZ, and are not emissions-based. There are two types:
- liveried permit: and
 - standard business (un-liveried) permit.

Liveried permits, which cost less than a standard business permit, are issued under a *specific application process which includes the submission of vehicle photographs.*

Parking for disabled people

- 3.41 There is a national scheme for issuing Blue Badges to disabled people who meet national eligibility criteria. Eligibility for a Blue Badge is either automatically passported if the applicant is in receipt of one of a range of benefits, or is determined locally by local authorities who assess applicants' level of mobility. The scheme allows holders of Blue Badges a range of parking concessions to improve accessibility. These concessions include dispensations from paid on-street parking, and also allow parking on yellow lines for up to 3 hours unless a ban on loading or unloading is in force. Some of the on-street concessions do not apply fully in central London, but Blue Badge holders are exempt from the London congestion charge, subject to payment of an administration fee.
- 3.42 The badge is issued to the individual, not to the vehicle and can be used in any vehicle so long as the holder is travelling in it.
- 3.43 Legislation allows the introduction of marked on-street disabled parking bays, in which the holders of Blue Badges are entitled to park if their permit is displayed in the windscreen of the vehicle which they are using. Motorists without a Blue Badge, who park in one of these bays, are liable to enforcement action.
- 3.44 The use of a Blue Badge to obtain the above concessions is only permitted if the disabled person, to whom the Badge has been issued, is a driver or passenger in a vehicle at the time at which parking takes place. Any misuse of Badges is an offence, and in such cases the Badge may be withdrawn from the disabled person.
- 3.45 Residents of England qualify automatically for a Blue Badge if they are aged two or over and one of the following applies:
- they are registered blind
 - they get the higher rate mobility component of disability living allowance (DLA)
 - they have been awarded 8 points or more in the 'moving around' activity of the personal independence payment (PIP)
 - they get war pensioners' mobility supplement
 - they have received a lump sum payment from the Armed Forces and Reserve Forces Compensation scheme (within tariff levels 1-8).
- 3.46 Anyone over two years old *may* be eligible for a Blue Badge, if they either:
- have a permanent and substantial disability which means they cannot walk, or makes walking very difficult; or
 - drive a motor vehicle regularly and have a severe disability in both arms, making it very difficult or impossible to operate parking meters.
- 3.47 A parent of a child who is younger than three years old may also apply for a Blue Badge. The child must have a specific medical condition which means that they either:
- must always be accompanied by bulky medical equipment which is very difficult to carry around; or
 - need to be kept near a vehicle at all times to get emergency treatment for a condition when necessary.

- 3.48 People who do not automatically qualify for a Blue Badge may have an application agreed following a desk-based assessment which considers the evidence (usually medical) that the applicant can supply to confirm their mobility problems. Otherwise the applicant will be subject to a mobility assessment to determine whether their level of mobility is such as to qualify for a Badge.
- 3.49 Although the Council previously issued Blue Badges free of charge, it has agreed to introduce the statutory maximum fee of £10 for issuing a Blue Badge.

Parking by disabled residents

- 3.50 With increasing numbers of cars parking in the Borough's streets, many residents experience difficulty parking close to their homes. Whilst all drivers can suffer inconvenience at times, disabled drivers are more seriously affected. In recognising the special needs of disabled drivers, Brent Council seeks to assist those who are most disadvantaged by mobility problems.
- 3.51 Where a resident has sufficient room on their property to accommodate a vehicle, the Council's policy is to encourage the resident to convert their garden to enable their vehicle to be parked off the road. The Council can carry out works to drop the kerb and construct a strengthened ramp in the footway to enable the resident to access their property at the owner's expense. In some cases, blue badge holders may be able to claim some financial assistance to carry out this work, as part of a personal care package. However, this option may not be possible if there is insufficient space, and in some circumstances it may be necessary to seek planning permission for the changes.
- 3.52 If a Blue Badge holder experiences problems with parked vehicles obstructing their driveway access, a white line or "access bar" can be marked on the road. Access bars are discussed in more detail later in this document.
- 3.53 The Council can provide an advisory sign for fixing to the disabled driver's property, to remind other drivers to park with consideration. These can be used either in conjunction with a crossover, or to deter kerbside parking along the kerbside outside a disabled driver's property.

Disabled persons' parking places

- 3.54 A disabled person's parking place is a parking space marked on the public highway by a white-painted box with a sign indicating that it is for the use of blue badge holders only. The space is defined by a Traffic Order, which makes it an offence for any vehicle to be parked there without displaying a valid blue badge. The process for making a Traffic Order means that anyone affected by the proposed bay can submit an objection, which must be considered before a decision is reached on whether to designate the space.
- 3.55 Even when a bay is requested by a householder, it is not reserved for their personal use. The disabled person's parking place is still available for any blue badge holder to use, although in practice this may be a rare event.

3.56 The Council's criteria for granting a disabled person's parking place are as follows:

- The applicant must be a registered Blue Badge holder.
- Where off-street facilities are available, a bay may be provided if the applicant can demonstrate that the facilities are either unsuitable for the use of a disabled person due to the nature of their disability, or unsuitable for their vehicle.
- The applicant must use and drive a vehicle kept at the premises, except where the applicant:
 - a) requires substantial physical assistance from the driver of the vehicle when entering and leaving the vehicle and the driver is generally the only person available to assist the passenger: or
 - b) is sufficiently mentally or physically incapacitated to necessitate constant supervision by the driver of the vehicle and the driver of the vehicle is the only person available to effect this supervision.
 - c) The driver should also live at the applicant's address.
- All disabled person's parking places will be operational 'at any time'.
- Disabled persons' parking places will only be approved at locations where road safety will not be adversely affected by their provision.
- Where disabled persons' parking places are considered to be no longer necessary due to a change in circumstances, or are reported to be unused, they will be removed.

3.57 Disabled person's parking places are not provided for:

- Dial-a-Ride, taxis, hospital drivers or others, for the purpose of picking up or setting down passengers.
- Non-disabled visitors or carers.

Personalised disabled bays

3.58 In addition to providing ordinary Disabled Person's Parking Places as set out above, the Council has its own local scheme to assist residents with a greater degree of disability. A personalised bay reserves the space for a named user, and other Blue Badge holders may NOT park in the bay.

3.59 The Council's main criteria for granting a personalised disabled bay are as follows:

- Applicants must hold a Brent issued valid Blue Badge.
- Applicants must be receiving the DLA Higher rate of Mobility Component for an indefinite period. The higher rate of Attendance Allowance will also be accepted for applicants aged 65 or over.
- Applicants must be driving their own car or nominate a carer who drives them who also resides at the same address.
- Applicants must have no access to off street parking facilities.
- The bay will be subject to an annual review.

3.60 The full criteria for provision of a personalised disabled bay are set out at Appendix 3.

Advisory signs for disabled drivers

- 3.61 In locations where it is not possible to provide a formal disabled bay, the Council will consider installing an advisory sign, fixed to the disabled driver's property, reminding other drivers to park with consideration. No markings are put on the road.

Off-street disabled parking

- 3.62 The Council provides dedicated disabled parking bays in most of its car parks. Commercially-run public car parks may also provide dedicated disabled bays.
- 3.63 The Council also places requirements on developers through the planning process to provide stipulated numbers of dedicated off-street parking places for disabled customers, staff and visitors in new developments.

Essential User Parking

- 3.64 The Council operates an Essential User Permit (EUP) scheme to help certain charitable organisations and public sector workers to provide essential care and services to people that live or work in controlled parking areas. The scheme was introduced in 2003.
- 3.65 An essential user permit (Essential Service User/ESU permit) is available to any person who performs a statutory service on behalf of the Council, including social housing management and residential or community care management, or is a health visitor, general practitioner, district or community nurse, midwife, chiropodist, dentist or osteopath employed by the National Health Service, or who provides home visiting on behalf of a religious or non-profit making charitable organisation. Permits are also available for highway maintenance works and for visits to premises or structures that are potentially dangerous. The scheme was extended to schools (in limited circumstances) in 2008, subject to their commitment to develop a school travel plan.
- 3.66 An ESU permit is only valid whilst the holder is undertaking official duties. This usually means at a clients' house or workplace, and never includes the permit holders' own office or other workplace. In addition, the permit may not be used for official duties within 500 metres of the holder's place of work. The permit does not guarantee that a space will be available for the user at any particular location.
- 3.67 An ESU permit temporarily entitles the permit holder, whilst undertaking official duties, to park in:
- a resident permit holders only bay;
 - a permit holders only bay; or
 - a dual-use bay (pay & display and permit/resident permit holders bay).

3.68 An ESU permit does not entitle a holder to park in or on:

- pay & display only bays;
- doctors' bays;
- disabled bays;
- car club bays;
- car parks;
- a Controlled Parking Zone operated by another borough;
- any place subject to Wembley Event Day restrictions;
- privately-owned land, including housing estates owned by Brent Council; and
- suspended bays.
- loading bays;
- taxi ranks;
- motorcycle bays;
- yellow line restrictions;
- bus stops;

3.69 A full list of terms and conditions is available on the Council's website.

Car Clubs

3.70 Car Clubs are now well-established in Brent. These have either come about through planning agreements relating to individual developments, or through the Council working with car club companies to provide on-street bays where car club vehicles can be kept. The Council's Long Term Transport Strategy includes a commitment to draw up a Car Club Management Plan that will aim both to provide encouragement for car clubs in Brent, and also to provide a framework by which space on the highway can be equitably allocated between competing car club operators and private vehicle owners.

3.71 Car clubs offer significant benefits including:

- reducing on-street parking stress, by reducing the number of parked cars, encouraging car sharing and helping some residents to give up private car ownership;
- reducing traffic congestion (research demonstrates that car club members typically reduce their car mileage in favour of more sustainable means of travel);
- achieving emissions reductions, contributing to the Council's commitment to improve air quality in Objective 5 of the Long Term Transport Strategy; and
- reducing costs to individuals who only use a car occasionally.

3.72 The Council facilitates the provision and enforcement of on-street car-club bays in the borough, and will seek to increase their number where there is a clear demand. The Long Term Transport Strategy includes a target to increase the number of car club vehicles available to Brent residents by 20% by 2035.

3.73 Car club bays are reserved for the use of car club vehicles at any time, and exclude other permit holders and disabled drivers. Users of car club vehicles may park free of charge in resident bays across the borough, but not in shared use or Pay & Display bays.

3.74 There are no operational or administrative changes in respect of car club bays. Car club bay permits are free to operators to encourage car clubs in line with the Council's transport policy objectives.

Electric vehicles

- 3.75 The Council supports the adoption and use of ultra-low emission vehicles (ULEVs), including electric vehicles, due to their reduced impact on air quality. In addition, the Mayor of London has a policy to improve the availability of electric vehicle charging points across London. Electric vehicles have the potential to help reduce kerbside emissions if they become widely used, although current technology means that they are likely to be a more attractive choice in urban areas where the possibility exists of creating a network of publicly-available charging points. To date, take-up of electric vehicles by the general public has remained low, and there have been problems with the maintenance and reliability of some of the charging points already installed across London.
- 3.76 Residents' permits for electric vehicles are free (for the first car only), and electric vehicles are exempt from the central London Congestion Charge.
- 3.77 Currently four Council car parks have charging points, namely:
- Brent Civic Centre, Engineer's Way
 - Preston Road
 - St. Johns Road
 - Wendover Road
- 3.78 In addition, there are at least four other off-street locations in Brent with public charging points:
- Asda Wembley, Forty Lane
 - Asda Colindale, Capitol Way
 - IKEA Wembley, Drury Way
 - Ace Cafe, North Circular Road
- 3.79 The potential exists to install public on-street charging points. Since any bays would have to be reserved for electric vehicles only, the Council will take into account future demand and the loss of general public parking before considering whether to install any on-street bays.

Motorcycle parking

- 3.80 Motorcycles – or powered two-wheeled motor vehicles (PTWs) - are efficient users of road and parking space, although when in use they do not offer significant environmental advantages over other motor vehicles in terms of emissions. The Council also remains concerned about the high number of collisions associated with motorcycle usage.
- 3.81 Nevertheless, motorcycles can be a cheap and convenient means of personal transport. There are a number of areas in the borough where the demand for motorcycle parking is high, for example around key public transport interchanges. The siting of PTW parking facilities needs to be carefully planned so that they are highly visible to encourage natural surveillance and minimise theft.

3.82 The Council provides dedicated on-street motorcycle bays where this can be justified by demand and the needs of other users. The current locations are:

- Algernon Road
- Bolton Gardens
- Buller Road
- Chichester Road
- Coventry Close
- Harvist Road (3 sites)
- Kilburn Lane (3 sites)
- London Road
- Neasden Lane (2 sites)
- Pember Road
- Rainham Road
- Station Parade, Willesden
- Summerfield Avenue
- Wakeman Road
- Warfield Road
- Bayford Road
- Buckley Road
- Burton Road
- Claremont Road
- Dyne Road
- Kempe Road
- Kingsbury Road
- Montrose Avenue
- Oxford Road
- Prioory Park Road
- St. John's Road
- Station Terrace, northern arm
- Victoria Road
- Walm Lane
- Willesden Lane (2 sites)

3.83 Solo motorcycles can also park free of charge in:

- pay and display bays
- resident bays
- shared use bays
- permit holder parking bays
- Council-run car parks in Brent (some of which have dedicated motorcycle bays).

Motorcycles may not park on yellow lines or on the footway.

Cashless parking

3.84 A system for cashless parking payments has been in operation across the borough, on-street and in car parks, since December 2010. It allows motorists to pay to park their vehicle using a mobile phone and a bank card instead of using coins in a parking machine.

3.85 The system offers a wide range of benefits to customers, including choice of payment method, reminders that their parking session is due to end, and the flexibility to extend their parking session using their mobile phone, thereby eliminating the need to over-book initially.

3.86 Benefits to the Council include cost reductions in respect of coin processing, parking machine provision and maintenance, and reduced theft of cash from machines. Many parking machines are reaching the end of their reliable life, and without a transition to cashless parking, the Council would incur the capital cost of replacement.

3.87 The Council's current provider of cashless parking services trades as RingGo. Before using the service it is necessary to register, either in advance or at the time of parking, by providing the number plate, colour and make of the vehicle and details of the payment card to be used. There are several ways to pay to park with RingGo:

- by using an application (app) on a suitable mobile device
- by calling the phone service
- by text message
- through the internet (either via a mobile device or a PC).

3.88 When parking, a user is asked to:

- confirm the vehicle identity;
- confirm the location;
- state the proposed length of stay; and
- provide the security code from the payment card being used.

3.89 There is no charge for registering with RingGo and no charge for downloading or using the RingGo iPhone and Android apps. However, there is a small convenience charge, on top of the normal parking charges which apply. Since October 2013 the charges for cashless parking have been lower than for cash payments in Pay and Display bays.

Taxis and Taxi Ranks

3.90 There are six taxi ranks in the Borough, as listed below. The purpose of a taxi rank is to provide residents and visitors with a set location where they can hire a licensed taxi. Ranks are located in places where people are most likely to need a taxi, and there is a particular focus on the Wembley area. The ranks are the only places where a taxi may wait for business in a stationary position. It is an offence for any other vehicle to park in a taxi rank.

Location	Spaces
Arena Square / Engineers Way (Wembley Arena), Wembley (Not in operation when events require the closing of Boulevard Way)	6
Bridge Road / Brook Avenue / Olympic Square (Wembley Park Station), Wembley Park	17
Hilton London, Wembley	3
Kingsbury Road (Kingsbury Station), Kingsbury	2
Station Crescent (Sudbury Town Station), Wembley	2
Station Parade (Willesden Green Station), Willesden Green	2

3.91 Taxi ranks are designated by TfL in consultation with the Council, and the Council has responsibility for enforcement. The Council will conduct monitoring of stands and will continue to liaise with TfL over future arrangements and the provision or alteration of taxi facilities.

- 3.92 The Council's Local Development Framework preserves Policy TRN30 of the 2004 Unitary Development Plan, which says that developments likely to attract significant numbers of visiting members of the public should include adequate taxi parking facilities where boarding and alighting does not obstruct the public highway.

Doctors' bays

- 3.93 Doctors' parking bays are issued to registered practitioners for use at their surgeries, subject to production of proof that the premises are in current use as a surgery. The bays are restricted for use by the individual permit holder. The sign erected next to the bay includes the permit number, to indicate which user is permitted to park in the bay. Restrictions apply "at any time", so no other vehicle may legitimately park in the bay. There is an upper limit of three permits per address.
- 3.94 Doctors' permits do not permit doctors to park elsewhere during home visits. Parking for home visits is covered by the Essential User and Health Emergency Badge schemes.

Health Emergency Badge

- 3.95 The Council is part of the London-wide Health Emergency Badge (HEB) scheme, which is administered by London Councils on behalf of the London boroughs. The HEB scheme is intended to identify doctors' vehicles (and those of other qualifying health professionals) when being used on emergencies. The badge provides no immunity from parking regulations, but if a vehicle otherwise parked illegally is observed to be displaying a badge, Civil Enforcement Officers will generally not issue a Penalty Charge Notice (PCN) if the conditions of use are being adhered to.
- 3.96 Badges are issued to a practice or clinic, not an individual, and can only be used by professionals providing emergency health care. This includes doctors, nurses, midwives and health visitors, but not other para-medical practitioners such as physiotherapists, chiropodists and occupational therapists, or social workers.
- 3.97 The badge should be clearly displayed by hanging it on the rear view mirror, and the address of the patient being visited must be shown. Badge users attending a medical emergency can park in meter, pay and display bays and residents' bays without paying. If no alternative parking space is available, users can park on yellow lines. At all times badge users must ensure they do not cause an obstruction or endanger other road users. Badge users must not stay longer than absolutely necessary.
- 3.98 A vehicle displaying an HEB will not normally be penalised without an attempt made to contact the driver at the address shown on the badge. However, if a PCN is issued, any challenge must be individually contested using the normal process.

Special parking permit

- 3.99 The Council operates a Special Parking Permit scheme to meet the needs of key workers and services such as schools, social workers, certain charities and the police, whose place of work is situated within controlled parking areas. To meet the Council's commitment to sustainable transport, any affected organisation that requests a special permit must first prepare a Travel Plan, which illustrates that there are no other alternative travel options available. They must also:
- actively participate in the Council's Travel Plan programme;
 - demonstrate that the organisation has explored all reasonable alternatives for staff travel-to-work, including car sharing and other modes of transport; and
 - demonstrate that the organisation does not have sufficient off-street parking space to meet staff parking needs, and as a result suffers recruitment and retention problems.

Wembley event day parking

- 3.100 The size and number of events taking place at Wembley Stadium has led the Council to implement the **Wembley Stadium Event Day Protective Parking Scheme**. The scheme defines an event day zone where special parking restrictions are operational on all major event days at Wembley Stadium.
- 3.101 Wembley Stadium is a public transport venue. The scheme's restrictions are enforced to ensure that the area remains congestion free, and that minimum disruption is caused to the local community by visitors to the stadium. Anyone parking illegally in the event day zone is liable to receive a Penalty Charge Notice and may have their vehicle removed.
- 3.102 Event day restrictions operate between 8am and midnight on main roads to the stadium, and generally between 10am and midnight elsewhere outside Controlled Parking Zones (i.e. streets which do not have parking controls on non-event days).
- 3.103 In Controlled Parking Zones within the scheme area, the restrictions are 8am to midnight, with the exceptions of zone SA (Sudbury) which is 10am to midnight, and zone T (Brentfield Road) which operates at all times.
- 3.104 Also in Controlled Parking Zones within the scheme area, existing residents', business and other permits remain valid. In streets outside the CPZs, the Council offers a range of event day permits as follows:
- Event day resident permit
 - Event day visitor permit
 - Event day business permit
 - Event day school permit
 - Event day place of worship permit
 - Event day allotment permit
- 3.105 Event day permits are not vehicle-specific and are not subject to emission-based charges. There is a one-off single charge for each of these permits.

- 3.106 Applicants for an **event day resident permit** will have their residential status checked in the same way as other applicants for a resident permit. The maximum number of event day permits that can be purchased per eligible household is three. Residents of private roads in the scheme area are also entitled to permits to allow them to park in enforceable parts of the event day zone during an event.
- 3.107 Permit holders who have moved away are not currently required to surrender their pass. Most permit holders who move away dispose of their permit, but some are still inappropriately used. The Council intends to take steps to address this misuse.
- 3.108 Eligible households can also obtain **event day visitor** permits subject to a maximum of two per household. Residents of private roads in the scheme area are not entitled to visitor permits.
- 3.109 **Event day business permits** are available to legitimate businesses in the scheme area. These include passes specifically issued to support Royal Mail and Metropolitan Police operations in the area. For other eligible businesses, the maximum number of event day permits that can be purchased is three.
- 3.110 **Event day school permits** are available to a capped number of staff (currently 20) at schools in roads in the scheme area.
- 3.111 Up to 20 **event day place of worship permits** are available to recognised places of worship in roads in the scheme area that are subject to parking controls only on Wembley event days. It is not available to places of worship on roads that are subject to regular CPZ controls on non-event days.
- 3.112 Permits issued to places of worship and schools are not vehicle-specific and are transferable from one vehicle to another. Permits can only be used in roads within the area number shown on the permit.
- 3.113 **Event day allotment permits** are available to allotment holders at Brent allotments, subject to the applicant providing proof of vehicle ownership and proof that they have an allotment within the event day zone.

Other events

Funerals and Weddings

- 3.114 The Council will consider any special requests made by residents or funeral directors regarding parking arrangements for funerals or weddings. No charge is made for this service.

Religious Festivals

- 3.115 There are no formal policies in place for religious festivals. However, the Council will discuss any specific parking needs with organisers, and may agree to make informal local arrangements so long as these do not unreasonably cause parking or traffic problems for others.

Special occasions, one-off events and street parties

- 3.116 The Council understands that many residents living in the borough wish to hold non-religious events or celebrate special occasions from time to time, and these may also generate specific parking requirements. These events may be of any size, but

some may be large and have wide-ranging impacts. The Council publishes a guide “Organising Events in Brent”, which is available on the Council’s website, to assist people who wish to organise an event. The guide covers the very wide range of issues, including licensing and consultation, which may need to be addressed when organising an event.

3.117 Any event that will lead to an increase in traffic and parking in a particular area, a larger than average number of people on public transport, or a road closure, is likely to need a Traffic Management Order (TMO). In some cases, an event organiser may wish to close a road for a short period of time. A road that is closed to vehicle access, even for a short period of time, has many implications:

- the public may need to be informed of any road closures or diversionary routes well before the event dates;
- buses, taxis and emergency vehicles may be affected and may need to be warned of diversions;
- parking bays may need to be suspended for the day;
- business loading zones may be affected.

3.118 The Council requires a minimum of six weeks’ notice for street parties and a minimum of eight weeks’ notice for other events, for approval by the Borough Safety Advisory Group (BSAG) and to carry out the required procedures to close a road.

3.119 The Council makes a charge to cover its costs where a Traffic Management Order is required to close a street for an event.

Places of worship and community centres

3.120 Many places of worship are situated in residential areas. People often use their cars to travel to worship or to attend related community activities, and this can sometimes cause congestion and/or conflict with the parking needs of local residents and businesses. With the exception of event-day place of worship permits in Wembley (only premises that are not in a CPZ are eligible), no special on-street parking provision is made for places of worship and community centres.

3.121 The Council seeks to work with any faith group that wishes to reduce the impact of travel to their premises.

3.122 A specific Controlled Parking Zone (Zone T) is in place around the Neasden Temple to mitigate the impact on local streets.

Commercial vehicles, deliveries and servicing

3.123 To support the local economy and ensure that businesses can continue receive deliveries and despatch goods, the Council normally allows stopping on yellow lines for the purpose of loading and unloading goods. This arrangement, which is formalised in a Traffic Order, allows up to 20 minutes for this action, so long as a continuous loading or unloading process is taking place. Civil Enforcement Officers allow a twenty-minute observation period to check that a vehicle is parked for loading, and not for any other purpose, before issuing a PCN.

- 3.124 However, uncontrolled loading during peak traffic periods can lead to traffic congestion and endanger pedestrians, and it is therefore often necessary to prohibit loading and unloading at times of high traffic flow. These restrictions are indicated by signs and yellow kerb stripes.
- 3.125 When considering new traffic or parking schemes, the Council consults with businesses to ensure that the proposals will not have an unduly negative impact on the local economy, and that the access and loading needs of businesses are met without unacceptably compromising traffic management or the other objectives of the scheme.
- 3.126 Formal on-street loading bays can cause enforcement problems because of the difficulty in deciding whether a vehicle is involved in loading/unloading operations or is simply parking. The use of sections of yellow line, which prohibit parking but allow loading and unloading, is often a more flexible and practical way of providing for business needs.
- 3.127 All business proposals for better loading facilities are considered in the context of existing rear-servicing access, the impact on bus services, and the potential for the loss of footway space where the proposal is to “cut in” a loading bay.

Overnight parking of commercial vehicles

- 3.128 In common with most London boroughs, Brent prohibits the overnight parking of commercial vehicles on all borough streets. "Commercial vehicle" includes all goods vehicles whose maximum gross weight exceeds 5 tonnes, but does not include motor vehicles constructed or adapted solely for the carriage of not more than 12 passengers (exclusive of the driver) and their effects, or a hackney carriage (taxi). The parking ban operates from 6.30pm to 8.00am the following morning.
- 3.129 In practice, this means that most buses and coaches (but not minibuses as commonly recognised), and most larger lorries, are banned from parking overnight.

Coach parking

- 3.130 The Council does not currently own or operate any on- or off-street coach parking facilities. However, privately-managed coach parking is provided for event days at Wembley Stadium.
- 3.131 The Council's Local Development Framework preserves Policy TRN30 of the 2004 Unitary Development Plan, which says that developments likely to attract significant coach traffic (e.g. larger hotels and exhibition facilities) should include adequate coach stopping and parking facilities to ensure that unloading and alighting do not obstruct the public highway. The Wembley Area Action Plan of January 2015 suggests that existing stadium coach parking may be redeveloped, with any new coach parking being located away from the town centre, but within 960 metres of the centre of the Stadium.

Lorry Parking

- 3.132 There are no dedicated lorry parks in Brent.

Footway Parking

- 3.133 Parking on the footway causes an obstruction for pedestrians with wheelchairs and buggies, sometimes forcing them into the carriageway. It can also result in broken paving, which can become a trip hazard and lead to serious injury to elderly pedestrians.
- 3.134 The Greater London Council (General Powers) Act 1974 introduced a ban on parking on the footway, or on footway verges, in all roads in London. This is intended to prevent damage to the footway and to provide clear passage for pedestrians, visually impaired people and wheelchair users. This ban is now decriminalised and enforced in the same way as other parking contraventions.
- 3.135 Within the context of the London-wide ban, boroughs can introduce exemptions to prevent obstruction of the carriageway. These exemptions aim to assist in reducing traffic congestion and improving community safety by reducing obstruction of emergency vehicles in residential areas, while retaining adequate access for pedestrians. There are standard signs and markings which indicate where footway parking is allowed
- 3.136 The Council has adopted a set of criteria which have to be met before a street is granted exemption. These are:
1. Exemption will be granted only where the parking of vehicles wholly within the carriageway reduces the carriageway width to less than 3 metres.
 2. A minimum footway width of 1.2 metres for temporary schemes, or 1.5 metres where a permanent Order has been made, must be available for pedestrians.
 3. Roads in shopping and other busy pedestrian areas will not be considered.
 4. Roads outside schools, play areas, libraries, hospitals, health centres and residential homes for the elderly and other places of public assembly, will not be considered.
 5. Any road where, were it to be exempted, vehicles would park on a grass verge will not be considered.
 6. No vehicle will be allowed to park where it would obstruct the proper use, by all classes of vehicles, of a turning area provided at the end of a cul-de-sac or similar blocked highway.
 7. Motor cycles will be permitted to park on footways where footway parking exemption has been granted.
 8. Exemption will not be granted where residents can provide off-street parking but have chosen not to do so, or do not use existing off-street parking places for a variety of reasons not considered acceptable on highway, traffic or amenity grounds.
 9. Where a street does not meet the above criteria for exemption, and where any enforcement action would create a situation where access for emergency vehicles is obstructed and/or the capacity of the highway is reduced below its functioning level, special consideration will be given according to the particular circumstances, and the criteria relaxed as necessary.

Emergency vehicles

- 3.137 Fire, Ambulance or Police vehicles are exempt from all parking controls and restrictions while they are being used operationally in the borough. Access for these vehicles can prove difficult, especially at certain times of the day and along particular busy distributor routes
- 3.138 The presence of parked motor vehicles along these routes, and indeed in narrower residential streets, can sometimes delay emergency vehicles. This can have severe consequences. This problem is exacerbated when the driver of an illegally parked motor vehicle which is obstructing an emergency cannot be located quickly.
- 3.139 Unhindered access for emergency vehicles is essential and the Council will rigorously enforce against unauthorised parking on all of the main emergency corridors.
- 3.140 Emergency vehicle access is always considered when considering new traffic or parking schemes, and in considering applications for new developments.

School “Keep Clear” markings

- 3.141 The Council installs yellow zig-zag “Keep Clear” markings near schools at sites where parked vehicles are a hazard to children. The markings are a reminder not to stop and park at the school entrance for whatever reason and are enforceable under moving traffic contravention rules. New regulations restricting parking enforcement by CCTV, introduced in April 2015, still allow the Council to use CCTV to enforce these markings.

Access Bars

- 3.142 In areas outside Controlled Parking Zones, residents and businesses sometimes experience difficulty with drivers obstructing vehicular access to their premises. However the introduction of short sections of yellow line may not be practicable, as resources for the enforcement of waiting restrictions are limited.
- 3.143 The Traffic Signs Regulations and General Directions allow the provision of white access bars (carriageway markings to diagram 1026.1) across driveways where there is the potential for obstruction. The markings are to indicate to drivers that there is a vehicle access or crossover present and that they should not park.
- 3.144 Residents and businesses may apply to the Council for a white line marking. Markings cannot be provided where waiting restrictions are in force or where the white line would conflict with other carriageway markings. Accesses which are shared between two or more premises require the consent of all the affected occupiers. The Council makes a charge for this service. However, the charge may be waived for disabled applicants as part of a personal care package.

- 3.145 White line markings are advisory and are intended to act as a deterrent to thoughtless parking. However, enforcement is possible in some circumstances. The London Local Authorities and Transport for London Act 2003 (section 14) allows the Council to issue Penalty Charge Notices to, or remove, vehicles parked across dropped footways. This includes places where the footway is dropped to allow pedestrians to cross the road more easily.
- 3.146 In cases where a dropped footway is there to provide access to a driveway which is for individual residential premises (and not a business or shared with other premises), then enforcement action can only be taken when the occupier of the premises requests the local authority to do so. This means that it is not an offence for a residential occupier to park across his or her own driveway. The Council operates a telephone service between the hours of 8am and 10pm (except Christmas Day) which allows residents to ask for the removal of a vehicle which is blocking their driveway.
- 3.147 Other obstructions of the highway are a matter for Police enforcement and are dealt with under Section 137 of the Highways Act 1980.

Cycle parking

- 3.148 The Council encourages everyone living and working in Brent to cycle, for the benefits it offers to the individual as well as the benefits for the local community through reducing pollution, congestion and emissions. The provision of convenient, clean, well-lit and secure cycle parking can play a major role in an individual's decision to cycle on a particular journey.
- 3.149 Cycle parking facilities can be found throughout the borough in convenient locations near shops, workplaces and railway and underground stations, and the Council continues to identify new locations for the provision of cycle parking.
- 3.150 There is also a requirement to provide cycle parking in most new developments, including housing developments. The standards are set out in the Council's Local Development Framework (LDF), and compliance with these standards is checked as part of the planning application process.
- 3.151 It should be noted that cycle parking is not administered by the Council's Parking service.

Off-street Parking (Car Parks)

- 3.152 Public car parks in the Borough are operated both by the Council and by private operators. Car parks are the only way of providing substantial numbers of parking spaces in areas of high demand. They generally offer the opportunity to park for longer than nearby on-street space and often offer a cheaper tariff and visible security measures.

3.153 A summary of the Council’s off-street parking supply is given in Appendix 4, while Appendix 5 contains information on car parks which are run by other operators. The total Council off-street parking stock in the Borough is 893 spaces (including motorcycle spaces), allocated as follows:

Car spaces	796	Parent & child spaces	7
Disabled spaces	27	Electric vehicle spaces	
Business spaces	26	(plus 47 e.v. spaces also	6
Motorcycle (P2W) spaces	31	available as general parking)	
Total spaces	893		

There are also over 700 spaces in privately-run car parks available to the public on a “turn up and pay” basis.

3.154 In addition to the above, there are large numbers of spaces associated with shopping centres, supermarkets etc., although these are often intended for customers only.

Parking on Driveways

3.155 The concentration of event venues in Wembley means that a market has developed in which private householders, who are entitled to on-street permits, make their private driveways available for rent on a daily basis. In town planning terms, this is legal for up to 28 days a year. Any more permanent commercial use of a residential driveway would require the granting of planning consent.

3.156 There are additional parking controls on event days in the Wembley Stadium Event Day Parking Zone which are designed to reduce parking stress and protect the normal activities of residents and businesses on event days. The renting out of private residential space adds to parking stress by displacing residents’ vehicles on to the street, while long-stay event visitors, who would normally not be able to park, occupy the off-street space.

Parking on housing estates

3.157 Brent’s council-owned housing estates are managed by Brent Housing Partnership (BHP), which has responsibility for providing, managing and controlling parking on the estates’ unadopted streets, and for providing and managing secure cycle parking for residents. While roads on housing estates may sometimes appear similar to the surrounding public highway, they are in fact private roads. A separate permit system, operated by BHP’s contractor (currently Wing Parking), operates on estate roads. Permits issued by the Council’s Parking service for use in nearby Controlled Parking Zones are not valid on BHP housing estates.

3.158 Blue Badge holders are not automatically entitled to park on estate roads, and where disabled parking is available, additional conditions may apply.

3.159 BHP residents are able to apply for up to two resident permits and one visitor permit, subject to providing proof of residence and confirmation that residents’ vehicles are registered at the applicant’s address. Permits last for one year.

3.160 Residents of housing estates may also apply for a normal on-street parking permit in the relevant zone, but only if their address is on an adopted road

Procedure for introducing on-street parking schemes

3.161 The Council will consider the introduction of new CPZs or other on-street parking controls where:

- there is public support and there is evidence of a need for demand management; or
- parking is compromising road safety.

Controls have been introduced in order to regulate traffic volumes and parking demand in order to support the transport and environment objectives of the LDF and the Long Term Transport Strategy.

3.162 The programming of new parking projects is subject to prioritisation alongside other transport projects within existing budgets. Funding for new parking controls may also be available when the transport assessment for a new development indicates the need for additional controls, and the funding for the work is secured under a planning agreement related to the development.

3.163 As required by the Road Traffic Regulation Act 1984, all restrictions on kerbside parking have to be introduced by making a permanent or experimental Traffic Management Order. As part of the order-making process, local authorities are required to carry out statutory consultation with defined stakeholders. These include:

- the emergency services;
- adjoining authorities, if affected;
- representatives of freight transport operators; and
- other known stakeholders who would be materially affected by measures.

3.164 In advance of the statutory order-making consultation, the Council will normally undertake informal consultation with residents, frontagers and elected ward Members. In some cases it may be appropriate to consult over a wider area before moving on to the statutory phase. Depending on the circumstances, and the scale of the proposal, consultees can also include Transport for London and local transport interest groups, such as Brent London Cycle Campaign.

3.165 The Council now seeks to make its consultations available on-line and through social networking sites. This allows a greater flexibility in reaching and responding to consultees and potentially opens access to decision-making to a broader spectrum of the population. Through this process, stakeholders in the community can play a part in developing schemes that provide solutions which address specific local issues.

3.166 Following the consultation process, the Council decides on the measures to be introduced following consideration of any comments or objections received. New schemes and changes to existing waiting and loading restrictions are generally made using permanent Traffic Management Orders.

4. Parking Spaces and New Development

- 4.1 As explained in Section 2 above, the Local Development Framework (LDF) is the Council's main planning policy document or, more correctly, series of documents. The provision of parking space in new developments is governed by local policies contained in the LDF, which in turn must comply with national planning policy and the London Plan. These policies cover not just the number of car parking spaces required, but also disabled parking, cycle parking, the provision of electric vehicle charging points, deliveries and servicing.
- 4.2 In summer 2014 the Council consulted on a further Development Plan Document (DPD), the draft **Development Management Policies** document. This includes, among other policies, updated policies on the provision of parking in new developments. When formally adopted the Development Management Policies document will form part of the LDF.
- 4.3 In general terms, the Council's parking standards for new developments:
- are maximum standards rather than a fixed requirement;
 - take account of public transport accessibility in the vicinity of the site; and
 - aim to ensure that off-street provision is sufficient not to generate additional on-street parking.

Car-free development

- 4.4 The Council's planning policies generally require that residential developments should include some parking provision for residents. The number of parking spaces required can vary depending on the location of the development, the degree of public transport accessibility and the type of tenure.
- 4.5 Exceptionally, "car-free" housing developments may be permitted in areas with good or very good public transport accessibility. In Wembley, the Wembley Area Action Plan of January 2015 states Policy WEM 15 that the Council will *promote* the implementation of car-free development where it can be associated with good public transport accessibility.
- 4.6 An essential aspect of car-free developments is that occupation is restricted by condition to those who have agreed not to be car owners (other than for pooled communal vehicles). These residents will not be granted residents' parking permits.
- 4.7 Consequently it is only possible to consider car-free development in areas where on-street parking is already restricted.

Transport assessments and travel plans



- 4.8 Larger developments may be required to submit a transport assessment as part of the planning application process. Transport assessments identify the amount of travel likely to be generated by a development, how people are likely to travel, and any impact the development may have on the road or public transport networks. A transport assessment can also identify the amount of car and cycle parking needed by a development, and any delivery or servicing needs.

- 4.9 One outcome from a transport assessment may be the development of a travel plan for the site. A travel plan will build on the transport assessment to identify ways of encouraging sustainable travel during the life of the development. A key element of a travel plan is that it is regularly monitored and updated, and there is continuing engagement with staff and other users of the site. Examples of travel plan initiatives can include the provision of secure and dry cycle parking, loans for season tickets or the purchase of bicycles, the use of pool cars or car club vehicles for business journeys, and the provision of information on bus routes and timetables.

5. Parking Charges

Parking pricing principles

- 5.1 The former Parking and Enforcement Plan set criteria for determining parking charges, as set out in paragraphs 5.2 and 5.3 below. These criteria remain in force as part of this Strategy.
- 5.2 The Council will progressively develop a parking and CPZ permit charge structure that reflects balanced transport policies and overarching environmental aims and objectives. On this basis, and subject to local conditions, parking and permit charges will be higher in areas where the combination of motor traffic and parking impose the greatest external costs on the community and the environment, and also in locations that are highly accessible by public transport, walking and cycling. In addition, maximum stay parking periods will be set to discourage commuting. The broad criteria for setting charges are as follows, although each case will be considered on more detailed merits:

Highest charge  Lower charges	Locations that are highly accessible by public transport, walking and cycling and therefore have the greatest potential for mode shift, and which suffer high levels of congestion and parking stress.
	Locations where the environmental impact of high motor traffic volumes is greatest, including congestion, costs to the economy, air pollution, noise, danger and community severance. The most acutely affected areas are generally within parts of the borough designated as Air Quality Management Areas.
	Locations where enhancement and maintenance of the built environment is most needed and where parking and motor traffic volumes are judged to significantly undermine the quality of the built environment and discourage walking and cycling.
	Areas where local strategies for transport are directed towards restraining the use of private cars.
Higher charges  Lowest charge or free (in exceptional circumstances only)	Secondary shopping locations on the edges of town centres and including smaller district centres with good public transport, cycling and walking accessibility, where nevertheless the car plays a significant role in maintaining a viable local economy.
	Areas that have poor public transport accessibility and low density catchment areas, where the car is acknowledged as an essential tool to meet daily needs. In local shopping areas, the Council will consider the merits of providing free short stay parking (maximum half an hour) in order to facilitate 'stop and shop'.
Exceptions to the general rule	Charges for specified users, low emission vehicles and city car club vehicles will be varied according to their adjudged contribution to reducing the negative externalities of car use. Cycle parking will be provided free of charge except where there is good reason to make a charge (for example to cover the reasonable costs of maintenance and (re)provision of long stay facilities). Motorcycle parking will also be free of charge, but only until such time as the Council identifies a robust mechanism for registering that a motorcyclist has paid for parking.

5.3 Parking charges will be reviewed regularly to ensure that:

- they are consistent with charges made in other boroughs;
- they meet the environmental principles set out in the table above; and
- local businesses are not unduly affected by high levels of charges in terms of loss of trade to other shopping areas.

5.4 In September 2012, the Council's Executive adopted a further set of principles in order to guide future pricing of parking. These principles are:

No change should be made that undermines policy objectives, and subject to this overriding principle:

- A preference for annual inflation-matching price changes, rather than longer periods of static pricing followed by substantial price change, unless the cost of implementing annual inflation is economically unviable;
- Where different means of applying or paying for services result in significantly different costs for the Council, customer prices should reflect the different costs;
- The general consumer assumption that larger or longer purchases should result in a lower unit cost should apply where practicable;
- Inconsistent pricing for comparable products should be avoided;
- Very large anomalies should be eliminated in a staged manner;
- The cost of enforcement should, where possible, be met by the income from parking charges and permits, with receipts from contravention penalties being released for wider transport or environmental objectives.

5.5 Whilst it is reasonable for a Council to take due regard of estimated costs and income arising from the management of parking, is not lawful for a Council to use the Road Traffic Regulation Act 1984 to impose charges to raise revenue.

5.6 Also in September 2012, the Executive agreed that the pricing of a range of permits, available for different durations, should be priced according to fixed multiples as follows:

- 24 month permit 195%
- 12 month permit 100%
- 6 month permit 60%
- 3 month permit 40%
- 1 month permit 20%

5.7 It was also agreed that residents' permit prices should be automatically adjusted on the 1st day of April each year, based on the most recent available RPI data published by the Office for National statistics, and rounded to the nearest pound. This will typically be the January RPI figure, which is published on the 20th of February of each year. To simplify price increases, the prices of a number of parking products are now linked to the annual price of a band 4 first vehicle resident's permit.

5.8 In October 2013 the Council introduced a second tariff for users of the cashless parking service, in recognition of the fact that the operating costs of a cashless service are markedly lower than cash payments at pay and display meters.

Penalty Charge Bands

- 5.9 Penalty charges are set on a London-wide basis, and are applied according to location and the nature of the contravention. In general terms, a penalty will be in the “lower” or “less serious” category if it relates to a place where parking is normally allowed, and in the “higher” or “more serious” category if it relates to a place where parking is prohibited.
- 5.10 The penalty charges which currently apply in Brent are set out below. However, it should be noted that they are subject to change:

	More serious contraventions	Less serious contraventions
Band A 1. All roads in the Wembley Event Day Protective Parking Scheme Area (at all times and not only on Wembley Event Days). 2. Harrow Road between Greyhound Road and Kilburn Lane.	£130	£80
Band B All remaining streets in the London Borough of Brent.	£110	£60
Car Parks – all zones	£110	£60

There is a discount of 50% if a Penalty Charge Notice issued by a CEO is paid within 14 days. The period is 21 days if the notice is issued by CCTV.

- 5.11 Charges for other contraventions and parking services are also set on a London-wide basis. These include the following:

Contravention	Penalty charge
Bus lane contravention	£130
Minor moving traffic contravention	£130
Release from car pound	£200
Vehicle storage charge	£40 per day
Disposal fee	£70

Emissions-based charging

- 5.12 As stated in the “residents’ permits” section above, the Council uses vehicle emissions as the basis for setting its charges for residents’ parking permits.

Permit refunds

5.13 Permit holders who no longer require a permit, for example those who have moved out of the borough or have disposed of their vehicle, are eligible for a partial refund of their permit fee. The arrangements for refunds are set out in the Council's Traffic Management Orders, and are as follows:

- annual permits – maximum 4 months' refund;
- 6 month permits - maximum 2 months' refund;
- 3 month permits - maximum 1 month's refund.

Only full months remaining are eligible for a refund.

Dispensations and suspensions

5.14 Dispensations temporarily allow a vehicle to park in a location where parking is not generally permitted (for example, on yellow lines or in a reserved bay) where no alternative parking is reasonably available. This often happens when building works are required to take place at a property and there is no practical alternative parking available. The maximum dispensation is for four hours in every 24 hour period. Any issued permit must be displayed on the windscreen on the authorised vehicle.

5.15 Suspensions allow existing parking spaces to be suspended where traffic flow would be compromised during road works, or to accommodate traffic attending special events. Suspensions are also used to facilitate building works, filming, removals, funerals and so on. In these cases the temporary suspension of a parking bay reserves a specific bay or bays for use on a specified day, or part of a specified day, by a specified vehicle. If a suspension is granted, the Council will post notices informing other motorists of the change. Any issued permit must be displayed on the windscreen of the authorised vehicle.

5.16 Vehicles which park in a suspended bay once a suspension notice is displayed are liable to be removed for parking in contravention. Any other items left in a suspended bay are liable to be removed. Because of the need to inform motorists of a forthcoming suspension, an application must normally be made 21 days in advance. Urgent suspensions with short notice will normally attract an additional fee.

5.17 Applications for dispensations and suspensions can be made by email or post, using a form available on the Council's website. A fee is chargeable for this service. The Council does not guarantee that it will grant an application for a dispensation or suspension.

5.18 A suspension does not affect the designation and legal status of a parking place. It merely removes the parking place (or part of it), from use during the period of the suspension. Any suspension approved and carried out by, or on behalf of the Council, is without prejudice to any action which may be taken by the Metropolitan Police to suspend parking places without prior warning for reasons including security and public safety.

6. Parking Enforcement

- 6.1 The parking controls and services the Council provides need to be enforced to ensure that residents, visitors and businesses get the benefits that are intended. The Council recognises that a practical, common sense approach is needed to carry out its parking enforcement responsibilities, and it aims to get the balance right ensuring there is neither too much enforcement nor too little. Information provided by members of the public helps to achieve this.
- 6.2 However breaches of parking restrictions, due to lack of knowledge or deliberate abuse of the rules by drivers, are unfortunately common. Contraventions of parking restrictions can lead to traffic congestion and have adverse implications for road safety. While many people consider that a breach of the rules is of minor importance, they do not always appreciate the cumulative effect of illegal parking on road safety, congestion and traffic flow.
- 6.3 To ensure that the rules are observed, the Council deploys Civil Enforcement Officers (CEOs) to identify and take enforcement action against vehicles not abiding by local parking regulations. CEOs patrol the whole of Brent, but their deployment is focused on priority locations, including Controlled Parking Zones (CPZs).
- 6.4 Parking contraventions are normally dealt with by the issue of a Penalty Charge Notice (PCN) and, in appropriate circumstances, by removal (towing away) of the vehicle. In certain circumstances, warning notices may be issued instead of PCNs. The offences for which PCNs can be issued are detailed in the list of offence codes issued by London Councils, as set out in Appendix 6.
- 6.5 As well as managing Controlled Parking Zones and local parking schemes, the Council also provides important enforcement of other parking restrictions to bring about motorist compliance. The list below is not exhaustive, but the work undertaken by the service includes enforcement of:
- School “Keep Clear” markings
 - Yellow lines
 - Footway parking
 - Bus lanes
 - Yellow box junctions
 - Other moving traffic offences
- 6.6 Following an innovative joint procurement exercise with the London Boroughs of Ealing and Hounslow in 2013-14, the three boroughs jointly awarded a parking enforcement contract to Serco Ltd. The contract with the previous long term supplier, APCOA, came to an end in July 2013. The contract with Serco has provided new vehicles and equipment for the service, a new operational base and car pound at Park Royal, more efficient working methods, and enhancements to the customer experience.

Civil Enforcement Officers (CEOs)

- 6.7 The Council's Civil Enforcement Officers are employed by Serco under the parking enforcement contract. All CEOs are fully trained before they start their enforcement duties and are required to follow guidance set by London Councils, the organisation that represents the common interests of the 32 London boroughs and the City of London.
- 6.8 CEOs wear a uniform that is easily recognisable and each officer is required to display an individual ID number. CEOs are not paid commission and they are not set individual targets set for the number of Penalty Charge Notices (PCNs) they issue. A CEO who identifies a contravention is expected to issue a PCN. CEOs use a hand-held device to assist in issuing PCNs, and are required to keep a log and record photographs of contraventions for evidence purposes.
- 6.9 Following the implementation of a new parking scheme, CEOs will issue Warning Notices rather than PCNs for two weeks. Warning notices are also issued for up to seven days following the expiry of a resident's permit.
- 6.10 CEOs have a difficult role to perform and can experience conflict with some members of the public. Assaults on CEOs are treated very seriously and will be investigated. The Council will press for Police action in the case of any assault. Any allegations of dishonesty or impropriety on the part of CEOs are also fully investigated.

Penalty Charge Notices

- 6.11 A Penalty Charge Notice (PCN) is issued by being placed on a vehicle's windscreen. Less commonly, it will be handed directly to the driver or sent by post. There is a 50 per cent discount if payment is received within 14 days from the date the PCN was issued.

Observation periods and grace periods

- 6.12 In some cases, for example when a vehicle is left unattended on a yellow line where loading is prohibited, it is possible for a CEO to issue a PCN immediately. In other cases, a CEO will not issue a PCN to a vehicle until he or she has observed the vehicle for a minimum of three minutes. This **observation period** is used to ensure that, for example, the vehicle has not stopped simply to pick up a passenger from the kerbside, or is not legitimately loading or unloading.
- 6.13 In April 2015, new national rules were introduced to allow a ten minute **grace period** in specific circumstances, before a PCN could be issued. The grace period is the minimum waiting time which must be allowed to elapse between a vehicle being first observed as parked in contravention, and a CEO then issuing a PCN. The observation period may commence within the grace period.

6.14 Examples of when a grace period **will apply** include:

- a vehicle parked in a residents' bay (or other controlled bay) at the start of controlled hours;
- a vehicle parked in a paid bay whose paid-for period has expired; and
- a vehicle displaying a Blue Badge that is parked on a Blue Badge bay for longer than any stipulated time period.

6.15 Examples of when a grace period **will not apply** include:

- a vehicle parked on a permit bay, shared use bay or pay and display bay when controls are already in force, and the driver does not display a permit/scratch-card or pay and display ticket. In other words, the grace period does not allow ten minutes' free parking where the driver would otherwise have to pay;
- a vehicle parked outside the hours of control on a single yellow line (and not in a designated parking place) when controls commence;
- a vehicle parked in a bay that is not designated for that class of vehicle if it parks when controls are already in force;
- a vehicle parked on a yellow line displaying a blue badge if parked for longer than the maximum 3 hour period.

Challenging a PCN

6.16 The Council aims to provide a firm, fair, transparent and customer-focused enforcement service. If a motorist disputes the issue of a PCN he or she has received, they can challenge the PCN informally. Should the motorist be dissatisfied with the Council's response at this stage, they can make a statutory Representation in writing which the Council must by law consider. There are eight statutory grounds for making a Representation, but in practice the Council will consider every Representation even if it does not fall within the prescribed grounds.

6.17 If a Representation is rejected, and the motorist is not satisfied with the decision, a written appeal may be made to the Parking and Traffic Appeals Service (PATAS, which fulfils the Parking Adjudicator role in Greater London). The appellant may request a personal hearing.

6.18 The Council has a duty to comply with any direction issued by the Adjudicator.

CCTV enforcement – parking

6.19 The Council continues to use CCTV enforcement for a number of purposes. New operational guidance introduced by central Government in April 2015 has restricted the use of CCTV for enforcing parking (as opposed to moving traffic) offences. These changes mean that in most circumstances a parking PCN may only be issued by fixing it to the offending vehicle or handing it to the person who appears to be in charge of the vehicle.

6.20 Since CCTV parking enforcement relies on serving the PCN by post, it may no longer be used except in specified circumstances. These are:

- if the CEO has been prevented (for example by force, threats of force, obstruction or violence) from serving the PCN;
- if the CEO had started to issue the PCN but did not have enough time to finish or serve it before the vehicle was driven away, and the CEO would otherwise have to write off or cancel the PCN;
- where the contravention has been detected on the basis of evidence from an “approved device”.

6.21 An “approved device” is a camera and associated recording equipment which has been approved by the Secretary of State for Transport. PCNs for parking contraventions may not be served by post on the basis of evidence from an approved device other than when vehicles are parked on:

- a bus lane;
- a bus stop clearway or bus stand clearway;
- a Keep Clear zig-zag area outside schools; or
- a red route.

6.22 Certain contraventions (such as double parking, footway parking and parking in areas where stopping is prohibited) are difficult to enforce by CEOs on foot because the driver often remains close to the car and can move the vehicle if a CEO is seen approaching. Because CCTV may no longer be used to enforce against these contraventions, the Council has increased the level of on-street enforcement by redeploying some CEOs who were previously used to issue camera-based PCNs.

CCTV enforcement - moving traffic contraventions

6.23 In order to support the Council’s policy of encouraging sustainable form of transport, the Parking service provides stringent enforcement of bus lanes in order to secure faster journey times for bus users.

6.24 In addition, the Council has adopted powers available under the the Traffic Management Act 2004 to undertake civil enforcement of a number of moving traffic offences. Yellow Box Junctions, prohibited turns, and no-entry signs are all examples of moving traffic violations actively enforced by the service. Such restrictions are in place to ease congestion on the borough’s roads, and improve road safety.

6.25 CCTV enforcement is co-ordinated from an enforcement suite in Brent Civic Centre.

Mobile CCTV

6.26 The Council has retained the use of mobile CCTV for school Keep Clear markings. During the rest of the day the vehicles are used for enforcement at bus stops and for intelligence gathering.

Vehicle removals and clamping

- 6.27 The Council provides a vehicle removal service. In practice, removal is focused on more serious offences, such as obstructive parking which affects road safety or creates traffic congestion. A vehicle is eligible for removal if it remains in a pay and display or shared use bay for more than 30 minutes after a PCN has been issued. If a vehicle is involved in persistent contraventions, and has three or more PCNs outstanding, the removal period may be reduced to 15 minutes. In the case of other types of parking offence (such as obstructive parking on a yellow line), the vehicle may be removed immediately.
- 6.28 All vehicles that have been removed are taken to the Brent Car Pound, which is located at Unit 20-22, Whitby Avenue, Park Royal, NW10 7SF. The pound is open every day, except Christmas Day, between 8am and 8pm.
- 6.29 The Council does not operate a clamping service.

Abandoned and unwanted vehicles

- 6.30 The Council will remove abandoned or unwanted vehicles. The requirement for a vehicle to display a tax disc was removed in October 2014. It is now possible for a member of the public to check whether a vehicle is taxed or insured by entering the vehicle's registration number and make on the DVLA website.
- 6.31 Possible abandoned vehicles can be reported to the Council by telephone or online, giving the location, registration number, colour, make and model of the vehicle. Abandoned vehicles are removed to the Council's car pound in the first instance.
- 6.32 The Council will also remove unwanted vehicles. This service is free of charge to Brent residents having a vehicle collected from their home address, subject to proof of ownership. Removals requested by non-residents of Brent or by the managing agent of a property in Brent are subject to a charge for each vehicle removed from private property. A managing agent will also have to indemnify the Council against the consequences of removing a vehicle.

Enforcement Outcomes

6.33 The total number of enforcement activities has remained remarkably constant in recent years, as is shown in the table below. The proportion of penalty notices issued for moving traffic offences has risen slightly, as has the proportion of notices issued by CCTV. However, new rules introduced in April 2015 have strictly limited the circumstances under which CCTV may be used to issue PCNs for parking (as opposed to moving traffic) offences. The Council will monitor how the pattern of PCN issue has changed as a result of the reallocation of enforcement resources in response to the new rules.

Year	PCNs issued by CEO	Vehicle Removals following PCN	Moving traffic offences		CCTV Parking	Total
			Bus Lanes	Other Moving Traffic		
2011/12	91,010	4,358	2,153	19,644	24,692	141,857
2012/13	85,101	4,084	3,373	25,367	28,942	146,867
2013/14	75,460	3,085	5,681	24,029	37,353	142,523
2014/15	87,146	1,991	11,362	27,512	36,584	162,604

7. Parking Management

7.1 In addition to the enforcement services described in Chapter 6 of this document, the Council's Parking service also provides a number of administrative functions to ensure the smooth running of the service. These functions include:

- a telephone service to help customers to register for a parking account, to buy permits and other services, and advising customers on parking enforcement activities. This service is currently operated by Serco on the Council's behalf, and is available between 9am and 5pm, Monday to Friday;
- consulting residents, businesses and elected members on proposed changes to the service and on proposed new parking schemes;
- handling requests for parking/traffic enforcement when residents or businesses report problems; and
- monitoring the activities of our contractors to ensure an efficient service and value for money.

Online Parking Accounts

7.2 The Council launched an online parking permit system in the 2012/2013 year, with the majority of users transferring to the system in 2013/2014. This change has led to the closure of parking counter services and the withdrawal of paper-based scratch cards for residents' visitors. Initially the transition to the new system generated an unexpectedly high volume of demand for telephone-based services. However, the online permit system has now reached a steady business state, and the Council successfully processes an average of 35,000 customer transactions per month. These transactions are spread over 20 different products, although the most popular of these continue to be Resident Parking Permits (11% of transactions), and Visitor Parking (76%).

7.3 Applicants can apply online by:

- entering personal details including name and date of birth;
- selecting their address from the database; and
- providing vehicle registration details if applicable.

It is also possible to provide these details by telephone.

7.4 Applicants will not normally need to attach supporting documents, as the system automatically attempts to verify the applicant's car registration details, their address; and that they live in a Controlled Parking Zone.

7.5 If the system cannot verify an applicant's details, they will be given a temporary account. The services available will be limited to purchasing a permit valid for one month and purchasing up to 30 electronic visitor vouchers. This temporary period allows time for the applicant either to scan and email one of a small list of acceptable documentary proofs of address, or to copy the proof and submit it by post. If the application is subsequently validated, the applicant will be notified, and will then be able to purchase permits up to 12 months' duration, and also to purchase additional electronic visitor vouchers.

Fraud

- 7.6 Parking - particularly convenient parking - can be a scarce and sometimes expensive resource, and the availability of free or relatively low-cost parking through residents' permits, visitor permits and disabled badges can sometimes be misused. Misuse of parking permits can constitute fraud and it can also be a criminal act.
- 7.7 In particular, Blue Badge fraud and misuse is a significant problem in Brent, in London, and across the rest of the UK. People who have a genuine disability and a real need for a Blue Badge are often unable to park as the spaces are taken by able-bodied people fraudulently misusing a Blue Badge to park free or on a yellow line.
- 7.8 Fraud and misuse of Blue Badges comes in a number of forms:
- Fraud: when someone is using a counterfeit Blue Badge, a stolen Blue Badge, an altered Blue Badge, or a deceased person's Blue Badge;
 - Misuse: when a genuine Blue Badge holder's Badge is used by another person and the Blue Badge holder is not in the car.
- 7.9 A national Blue Badge database was created in 2012 which helps prevent multiple and fraudulent applications and make it easier for people checking badges on the street to verify a badge's validity.
- 7.10 The Council organises regular drives against Blue Badge fraud and misuse. These operations involve members of the Council's Blue Badge and Audit & Investigation teams, and the Police, in targeting particular areas. Considerable successes have been achieved, involving the issue of PCNs, the towing away of vehicles and the confiscation of Blue Badges. The Council intends to enhance these activities by devoting staff resources to the detection and prevention of fraud and misuse.
- 7.11 If misuse is identified, a PCN can be issued, possibly supplemented by the vehicle being towed away. If the circumstances allow the Police to seize the misused Blue Badge, it can be returned to the genuine Badge holder with a warning, but no penalty. However, the Council has wide powers to prosecute both the person misusing the Blue Badge and a person who deliberately allows their Blue Badge to be misused. As part of its enhanced anti-fraud activities the Council will actively consider prosecuting the perpetrator in all cases of misuse.
- 7.12 The Council will always consider prosecution in cases which appear to involve fraud, and where sufficient evidence is available following an investigation.
- 7.13 The Council can withdraw a Blue Badge after a relevant conviction, or if there is evidence that it has been fraudulently obtained. Where the offence prosecuted was committed by a third party using the holder's badge, the authority needs to demonstrate that the holder knew the third party was using the badge, before it can be withdrawn. The Council has put in place a procedure to ensure that a vulnerable badge holder is neither prosecuted nor has a badge withdrawn as a result of being coerced or manipulated by a third party.

Travel initiatives

- 7.14 This Parking Strategy is one element of the Council's traffic and transportation policies, which together have shared strategic aims such as reducing the need to travel by private car, whilst supporting initiatives to increase social inclusion and economic activity in the borough. Thus projects which improve bus reliability, make it easier to choose to walk or cycle, or which improve accessibility to stations, and the introduction of car clubs and car-free developments, all have a role in reducing car use and car ownership. In turn this will help to slow down the spread of parking stress on the borough's streets.
- 7.15 Another initiative to encourage sustainable travel is the use of travel plans. Travel plans identify the current travel patterns at workplaces or other institutions like schools and colleges, and try to find ways of encouraging staff and other users to choose non-car modes of travel. (See also the section on parking in new developments).
- 7.16 Brent is one of six West London boroughs which make up the WestTrans partnership (the others being Ealing, Hammersmith & Fulham, Harrow, Hillingdon and Hounslow). WestTrans works to identify, develop and implement transport projects to the benefit of the subregion. It also contributes relating to the development of an appropriate transport strategy for West London and provides a platform to lobby regional and national government in a cohesive manner. WestTrans is able to offer organisations advice on developing their own travel plan.

Permit surrender scheme

- 7.17 In addition to the normal system for providing a partial refund of the permit fee for those who have moved out of the borough or have disposed of their vehicle, the Council runs a permit surrender scheme to encourage residents to adopt more sustainable forms of transport. Any resident who chooses to return an existing resident's parking permit and agrees not to purchase another for a minimum period of two years will be granted £200 towards the cost of either:
- membership of a car club;
 - the purchase of a bicycle; or
 - an Oyster card credit for use on London's public transport network.
- 7.18 It is not necessary to surrender all the permits in a household to take advantage of the scheme. However, the maximum number of residents' parking permits available to that household will be capped at a lower level for two years.
- 7.19 Residents taking up this offer must remain Brent residents for at least six months after surrendering their permit. They may also be asked to provide evidence at a later date of having used the money for the agreed purpose.

Financial arrangements

- 7.20 As stated in the chapter on Parking Charges, while a council may take due regard of estimated costs and income arising from the management of parking, it is not lawful for a council to impose on-street parking charges merely to raise revenue.

7.21 Local authorities in London are required to keep a separate account of their income and expenditure in respect of designated (i.e. on-street) parking places, and their functions as enforcement authorities. They must send a copy of this account to the Mayor of London. In addition, the Local Government Transparency Code requires authorities to publish on their website:

- A breakdown of income and expenditure on the authority's parking account. The breakdown of income must include details of revenue collected from on-street parking, off-street parking and Penalty Charge Notices.
- A breakdown of how the authority has spent any surplus on its parking account.

7.22 Furthermore, local authorities are prohibited from spending any surpluses in their parking accounts on anything other than the management of parking or other specified transport related expenditure (this specified expenditure is more widely defined as it applies to authorities in London). Local authorities may not use the surpluses to subsidise other non-related council services.

7.23 The Council currently uses its parking surplus on:

- transportation related expenditure; and
- the costs of the Freedom Pass

Further details can be found in the Council's Annual Parking Report.

Monitoring Performance

7.24 The Council maintains records of the Parking service's performance covering a range of indicators, including permit sales, on-street and off-street income, and income from enforcement. These indicators are published in the **Annual Parking Report**, which is available on the Council's website. The items included in the monitoring are as follows:

- Total permit and visitor revenue
- Visitor parking use
- On-street pay and display sales
- On-street cashless sales
- Off-street pay and display sales
- Off-street cashless sales
- On-street CEO revenue
- Off-street CEO revenue
- On-street CCTV revenue
- On-street bus lane revenue
- On-street moving traffic revenue
- Enforcement volumes
- Vehicle removals
- Telephone-based services
- Representations and appeals

8. Future Challenges

8.1 The challenges that the Council's Parking service will have to face in future years come both from within the borough and from outside it. Among the known factors which will contribute to the challenge are:

- the anticipated national growth in the number of cars owned and used;
- the planned expansion of Wembley Town Centre; and
- ensuring that parking from new developments does not worsen on-street conditions.

8.2 All these issues will, to a greater or lesser degree, have an impact extending beyond the borough's boundaries. The Council expects to work with neighbouring boroughs, with TfL and with London Councils, to develop common approaches to these challenges which nevertheless retain the flexibility to accommodate local priorities.

8.3 Improved and more secure public transport, measures to encourage walking and cycling, travel awareness campaigns, and better travel information will all have a role to play in managing increased demand for parking. Nevertheless, the expected changes mean that the direct demand for both on-street and off-street parking in the Borough is likely to increase.

8.4 The general underlying increase in demand will be reinforced by additional pressures at particular localities. Careful management will be required to ensure that new parking provision and new controls create an optimum balance which is closely aligned with the Council's economic, social, planning and transportation priorities. It is often the detailed way in which parking policies are applied at the very local, street-by-street, level which requires the most careful consideration and generates most debate.

8.5 Against the current background of public spending restraint, there is competition for allocation of the Council's scarce resources, and this will remain the case for the foreseeable future. The Parking service will face the challenge of delivering value for money while maintaining and developing the service so that it remains, and is seen to be, fair, efficient, effective and responsive to change.

8.6 In the context of these challenges, it will be important that this Strategy remains a living document which adapts to emerging issues and provides a flexible approach within the context of the Council's overall transport policies and objectives.



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Appendix 1 - Controlled Parking Zones in Brent

Zone	Location	Hours of Operation
C	Wembley Central	8am – 6.30pm Monday to Saturday excluding Bank Holidays
E	Ealing Road	8am – 9pm every day including Bank Holidays
G	Willesden	8am – 6.30pm Monday to Saturday excluding Bank Holidays
GA	Anson Road	10am – 3pm Monday to Saturday excluding Bank Holidays
GB	Dudden Hill	8.30am – 6.30pm Monday to Friday excluding Bank Holidays
GC	Dollis Hill Station	8.30am to 6.30pm Monday to Friday excluding Bank Holidays
GD	Denzil Road	8.30am to 6.30pm Monday to Friday excluding Bank Holidays
GH	Pound Lane	8.30am to 6.30pm Monday to Friday excluding Bank Holidays
GM	Cricklewood	10am – 9pm Monday to Saturday excluding Bank Holidays
GS	Donnington Road	8.30am – 6.30pm Monday to Friday excluding Bank Holidays
H	Harlesden	8am – 6.30pm Monday to Saturday excluding Bank Holidays
HS	Craven Park	8am to 6.30pm Monday to Saturday excluding Bank Holidays
HW	Wrotesley Road	8am to 6.30pm Monday to Saturday excluding Bank Holidays
HY	Cobbold Road	8.30am to 6.30pm Monday to Friday excluding Bank Holidays
K	Kilburn	8.30am – 6.30pm Monday to Friday excluding Bank Holidays
KB	Brondesbury	8.30am – 6.30pm Monday to Friday excluding Bank Holidays
KC	Canterbury Terrace	8.30am – 6.30pm Monday to Friday excluding Bank Holidays
KD	Dyne Road	8.30am – 6.30pm Monday to Friday including Bank Holidays
KG	Kilburn Lane	8.30am – 6.30pm Monday to Friday including Bank Holidays
KH	All Souls Avenue	12 noon – 3pm Monday to Friday excluding Bank Holidays
KL	Kensal Rise	8.30am to 6.30pm Monday to Friday excluding Bank Holidays
KM	Malvern Road	8am – 6.30pm Monday to Saturday including Bank Holidays
KQ	Queens Park	8.30am – 6.30pm Monday to Friday excluding Bank Holidays but including August Bank Holiday
KR	Kensal Green	8.30am – 6.30pm Monday to Friday including Bank Holidays
	Victor Rd & Napier Rd only	8.30am – 9 pm Monday to Sunday
KS	Brondesbury Park	8am – 6.30pm Monday to Friday excluding Bank Holidays

Zone	Location	Hours of Operation
	Kingsbury Road	8am – 6.30pm Monday to Saturday excluding Bank Holidays
MA	Mapesbury Road	10am – 3pm Monday to Friday excluding Bank Holidays
MC	Anson Road	10am – 9pm Monday to Saturday excluding Bank Holidays
MK	Christchurch Avenue	10am – 3pm Monday to Friday excluding Bank Holidays
MW	Walm Lane	8am – 6.30pm Monday to Saturday excluding Bank Holidays
N	Kenton	8am – 6.30pm Monday to Saturday excluding Bank Holidays
NC	Neasden Town Centre	8am – 6.30pm Monday to Saturday excluding Bank Holidays
NS	Neasden Town Centre	8.30am – 6.30pm Monday to Friday excluding Bank Holidays
NT	Normanby Road	8.30am – 6.30pm Monday to Friday excluding Bank Holidays
	Park Royal	7am to 7pm Monday to Saturday excluding Bank Holidays
QA	Queensbury	10am – 3pm Monday to Saturday excluding Bank Holidays
S	Sudbury	7am – 7pm Monday to Saturday excluding Bank Holidays
SA	Sudbury	10am – 3pm Monday to Friday excluding Bank Holidays
SH	Sudbury Hill	8am – 6.30pm Monday to Saturday excluding Bank Holidays
ST	Sudbury Town	8am – 6.30pm Monday to Saturday excluding Bank Holidays
T	Brentfield Road	At Any Time including Bank Holidays
W	Wembley Hill	8am – 9pm every day including Bank Holidays

Appendix 2 - Parking Permit Terms and Conditions

Parking Permit Application

1. Permits are only for vehicles with a maximum length of 6.5m, maximum height of 2.5m and a maximum weight of 5 tonnes.
2. The maximum number of permits that can be purchased per household is limited to the following; three resident permits; one Visitor Household permit; three Event Day permits (for eligible properties); two Event Day Visitor permits (for eligible properties); one Visitor permit for zones W,E and T ((for eligible properties). The maximum number of permits that can be purchased per business is limited to the following; three business permits; three business livery permits; three Event Day business permits (for eligible businesses).
3. The permit must be displayed on the vehicle to which it relates, in such a way that the particulars on the permit are readily visible from the front near-side of the vehicle windscreen.
4. Permits are NOT transferable from one person to another. Vehicle specific permits are only valid for the vehicle shown on the permit. Visitor Household permits can only be used by bona fide visitors visiting the Visitor Household permit holder. All Visitor Household Permits will be charged at the highest CO2 emission vehicle for the address given.
5. A permit does not give the holder the right to park outside their home or work place, nor does it guarantee the availability of a parking space.
6. The resident permit enables the holder to park in any resident or permit holder bay, and Shared Use (Resident/Permit Holders and Pay and Display) within the Zone shown on the permit. The visitor household permit allows parking in any resident or permit holder bay, and Shared Use (Resident/Permit Holders and Pay and Display) only in the street / part of the street within the Zone shown on the permit.
7. The business permit enables the permit holder to park in a business bay or permit holder bay within the Zone identified on the permit.
8. A resident, visitor or business permit does not entitle a holder to park in: Pay & Display only bays; Loading bays; Doctor bays; Taxi ranks; Disabled bays; Motorcycle bays; Car club bays; Yellow line restrictions; a different zone within the borough from that shown on the permit; a Controlled Parking Zone operated by another borough (unless specific authorisation is given in writing by either Borough); Suspended bays (it is your responsibility to check that the bay is not suspended on a daily basis).
9. The driver should always check the signs and that the bay is not suspended before parking to ensure that the vehicle is parked legally and within the bay markings. On Wembley Stadium Event Days, additional event related restrictions come into force and will be signed on the streets. Failure to check the signage and park legally may result in the issue of a Penalty Charge Notice and removal of the vehicle.
10. Permits must be surrendered if the holder changes address or ceases to own or use the vehicle for which the permit was issued.

11. Business permits must be surrendered if the holder ceases to work for the business, the business ceases trading or relocates outside of the Zone, or the holder ceases to own or use the vehicle for which the permit was issued.
12. A new permit must be sought in the event of a change of vehicle. Any change of vehicle must be notified immediately to the Parking Service and the original permit must be surrendered.
13. The property to which the permit application relates **MUST NOT** be in a car free development. A "Car Free Development" is part of an agreement made under Section 106 of the Town & Country Planning Act 1990, or a development for which planning permission has been granted where the description refers to it being car free and therefore, occupants of the property are not entitled to parking permits issued by the council. Any permit issued must be surrendered or the Council will revoke the permit immediately if the property is a part of a car free development.
14. It is the responsibility of the permit holder to renew the permit on time. Renewal reminders (letters or emails) are sent as a courtesy and are not a legal requirement. The permit holder remains responsible, regardless of whether they have or have not received a renewal reminder.
15. A permit holder who surrenders their permit shall be entitled to a refund of up to a maximum of one third of the value of the permit only.
16. As part of the Council's Policy to prevent fraud and misuse of permits, proof of address and proof of vehicle ownership can be requested at any time after the issue of a permit. Failure to co-operate may result in cancellation of the permit.
17. If a permit is lost, stolen, destroyed, defaced or mutilated, the permit holder must notify the Parking Service immediately and the permit will cease to be valid. A replacement permit will be issued for the unexpired period of the original permit and an administration fee of £15 will be charged. A police reference number is required for the replacement of Visitor Household Permit and Free Visitor Permit.
18. A charge of 1.25% will be added for payment by credit card.

“Alternatively Fuelled” Vehicles

19. Alternatively fuelled vehicles include a vehicle that is powered by an energy source separate or in addition to petroleum (petrol) or diesel. Examples can include hybrid vehicles (whereby a small petrol or diesel engine is accompanied by an electrical power source/motor, liquefied petroleum gas (LPG) and natural gas power sources. Brent Council does not offer a discount for any alternatively fuelled vehicles;
20. All factory-converted / purchased LPG conversions should have a dual Carbon Dioxide rating. When ascertaining the charge to be levied for a particular dual-fuel vehicle, the Council will always use the lowest Carbon Dioxide figure, affording the resident the cheaper resident parking permit. Where two readings appear, for example, on manufacturers' (factory) conversions, the lower of the two emissions readings will be used to calculate the cost of the Residents' parking permit. Brent Council will not consider aftermarket conversions to alternative fuel sources, nor other records displaying a Carbon Dioxide emission rating other than DVLA records in calculating the cost of a Residents' resident parking permit.

Visitor Parking

21. Resident's daily visitor parking permits are available for use only by genuine visitors to residents to whom the permits have been issued to within Brent Controlled Parking Zones.
22. A daily visitor parking permit is only valid if the vehicle registration number and date that parking is required is supplied to the Council. The permit is only valid for use in the Controlled Parking Zone shown on the permit.
23. Parking is only permitted on street in designated Resident or Permit Holder bays and Shared Use (Resident/Permit Holders and Pay and Display) bays during controlled hours (as displayed on street signs, within the Zone specified on the permit).
24. A daily visitor parking permit does not allow parking in off street car parks, in designated on street Business bays, Disabled bays, Personalised Disabled Bays, Car Club Bays, Doctors bays, Loading Bays, Pay and Display only bays, Suspended Bays, Housing Estates or other private land, or on yellow lines.
25. The issue of a daily visitor parking permit does not guarantee the availability of a parking space. Nor does it render the Council subject to any liability in respect of loss or damage to the vehicle in a parking bay, or to the contents or fittings of any such vehicle.
26. No refund will be given for any unused and /or expired daily visitor parking permit.
27. The use of parking bays may be suspended by police Officers, Civil Enforcement Officers or duly authorised Council Officers at any time without notice.
28. The user must ensure that the vehicle is parked within the confines of each designated parking bay.
29. This daily visitor parking permit is issued subject to the relevant Traffic Management Orders of the London Borough of Brent and may be subject to change in the future.
30. The Council will investigate and prosecute any cases of suspected fraud or misuse of the scheme. If we find evidence of fraud or misuse we will suspend the daily visitor parking permit facility, cancel credits already purchased, refuse to issue new visitor parking credit and/or issue a Penalty Charge Notice/remove the vehicle.
31. Daily visitor parking permits are NOT FOR RESALE, and are not transferable.
32. A charge of 1.25% will be added for payment by credit card.

Appendix 3 - Criteria for Personalised Disabled Persons' Parking Places

Mobility

1. Applicants must hold a Brent issued valid Blue Badge.
2. Applicants must be receiving the DLA Higher rate of Mobility Component (for example help getting around) for an indefinite period. A copy of the Disability Benefit and copy of the 2014 rate Department of Pensions must be provided. The higher rate of Attendance Allowance will also be accepted for applicants aged 65 or over.
3. Applicants must be driving their own car or nominate a carer who drives them who also resides at the same address (proof of name and address to be supplied). The vehicle must be parked at that address for the majority of the time during the day.

Parking

4. If applicants do not drive and has appointed a nominated carer to drive for them, the carer must receive the Carer's Allowance award. A copy of the Carer's Allowance must be provided. As in number 3, the carer must reside at the same address. Proof of name and address must be provided with application.
5. Applicants must have no access to off street parking facilities. Where off street parking exists, applicants may be required to provide proof that this facility is not available for their use. This may take the form of, for example, a Tenancy Agreement or Property Deeds.
6. If all of the above criteria have been met the applicant must then have mobility assessment (assessment as in established Blue Badge System used by Social Services, which will be modified to identify those with greatest mobility restriction). Applicants using additional mobility aids, sticks, wheelchair etc will provide written evidence of this use.
7. Applicants must agree to be visited at home, should this be necessary, in order for the Council to carry out further investigations, including contacting applicants before or after issuing a Disabled Person's Parking Place permit, to ensure that the address on the application is correct.
8. The following on site conditions will be taken into consideration:
 - Interests of traffic movement in the area and parking anxiety in the area
 - Interests of owners and occupiers of adjoining properties
 - The need to maintain access to premises
 - Road safety considerations
9. Personalised Disabled Person's Parking Places will be operational at all times.

Appendix 4 - Council-run car parks in Brent

Car Park	Number of spaces							Charged Hours	24h? (Y/N)	Park- mark (Y/N)
	Car spaces	Disabled spaces	Business spaces	P2W spaces	Parent / child spaces	Elect. Veh. spaces	TOTAL spaces			
								(Bank holidays are charged as normal unless explicitly stated)		
Barham Park	15	0	0	0	0	0	15	Monday to Friday - 10am to 3pm Sunday – no charge Wembley event days - 10am to 12 midnight Bank Holidays - 10am to 12 midnight	Y	N
Brent Civic Centre	146	9	0	21	3	(47)**	179*	Monday to Sunday – at all times	Y	N
Disraeli Road	74	0	0	0	0	0	74	Monday to Friday – 8am to 8pm Saturday and Sunday – no charge	Y	N
Elm Road	96	4	0	0	0	0	100	Monday to Saturday – 8am to 6.30pm Sunday - no charge except on event days Wembley event days – 8am to 10.30pm	N	Y
Kingsbury Road	25	4	15	4	0	0	48	Monday to Saturday – 8am to 6.30pm Sunday – no charge Wembley event days – 8am to midnight	Y	N
Lonsdale Avenue	33	0	0	0	0	0	33		Y	N
Neasden Town Centre	38	0	0	0	0	0	38		Y	N
Northwick Park	93	3	0	0	0	0	96	Monday to Friday – 8am to 6pm Saturday and Sunday – no charge Bank Holidays – no Charge	N	N
Preston Road	155	3	0	0	4	2	164	Monday to Saturday - 8am to 6.30pm Sunday – no charge Wembley event days - 8am to midnight	Partly (top level only)	Y
Salisbury Road	29	1	11	0	0	0	41	Monday to Saturday – 8am to 6.30pm Sunday – no charge Wembley event days – 8am to midnight	Y	Y
St. Johns Road	67	3	0	6	0	2	78		Y	Y
Wendover Road	25	0	0	0	0	2	27		Y	N
Total Spaces	796	27	26	31	7	6 (53)	893			

* Not all spaces are available for public parking **Available as general parking when not in use for vehicle charging

Appendix 5 - Privately run car parks in Brent

Car Park	District	Operator	Number of spaces			Hours of operation
			Cars	Dis-abled	Total	
Wembley Park Underground	Wembley Park	NCP	158	6	164	Mon-Sun 24 hours
Wembley Stadium Red Car Park	Wembley Park	City & Suburban Parking Ltd.	0	0	0	Mon-Sun 24 hours
Montrose Crescent	Wembley Central	Parking & Enforcement Agency Ltd	141	6	147	Mon-Sun 24 hours
Wembley Central	Wembley Central	Wembley Central Management Ltd	223	19	242	Mon-Sun 24 hours
Harlesden Plaza	Harlesden	LCP	100	10	110	Mon-Sun 24 hours
Queensbury Underground	Kingsbury	NCP	68	5	73	Mon-Sun 24 hours
Total			690+	46+	736+	

Appendix 6 - London Councils' Standard PCN Codes

On-Street

Code	General suffix(es)	Description	Diff. level	Notes
01	ajoyz	Parked in a restricted street during prescribed hours	Higher	Suffixes y & z for disabled badge holders only
02	ajo	Parked or loading / unloading in a restricted street where waiting and loading / unloading restrictions are in force	Higher	
04	cs	Parked in a meter bay when penalty time is indicated	Lower	
05	cpsuv1	Parked after the expiry of paid for time	Lower	
06	cipv1	Parked without clearly displaying a valid pay & display ticket or voucher	Lower	
07	cmprsuv	Parked with payment made to extend the stay beyond initial time	Lower	'meter feeding'
08	c	Parked at an out-of-order meter during controlled hours	Lower	Electronic meters only
09	ps	Parked displaying multiple pay & display tickets where prohibited	Lower	
10	p	Parked without clearly displaying two valid pay and display tickets when required	Lower	"two" may be varied to another number or "multiple".
11	gu	Parked without payment of the parking charge	Lower	
12	rstuwy4	Parked in a residents' or shared use parking place or zone without either clearly displaying a valid permit or voucher or pay and display ticket issued for that place, or without payment of the parking charge	Higher	
13		---- RESERVED FOR TfL USE (LOW EMISSION ZONE) ----	n/a	
14		Parked in an electric vehicles' charging place during restricted hours without charging	Higher	
16	bdehqstwx z4	Parked in a permit space or zone without clearly displaying a valid permit	Higher	Suffix "s" only for use where bay is completely non-resident
17		---- RESERVED FOR TfL USE (CONGESTION CHARGING) ----	n/a	
18	bcdefhjmprs v	Using a vehicle in a parking place in connection with the sale or offering or exposing for sale of goods when prohibited	Higher	
19	irsuwxyz4	Parked in a residents' or shared use parking place or zone either displaying an invalid permit or voucher or pay and display ticket, or after the expiry of paid for time	Lower	
20	j	Parked in a part of a parking place marked by a yellow line where waiting is prohibited	Higher	

21	bcdefghjlmpr qrsuv12	Parked wholly or partly in a suspended bay or space	Higher	
22	cfjlmnopsv	Re-parked in the same parking place or zone within one hour after leaving	Lower	"one hour" may be varied to another time period or "the prescribed time period"
23	bcdefghjklpr sv123	Parked in a parking place or area not designated for that class of vehicle	Higher	Suffix required to fully describe contravention
24	bcdefhlmprq rsv12	Not parked correctly within the markings of the bay or space	Lower	
25	jn2	Parked in a loading place during restricted hours without loading	Higher	On-street loading bays
26	j	Parked in a special enforcement area more than 50 cm from the edge of the carriageway and not within a designated parking place	Higher	"50 cm" may be varied to another distance in Scotland.
27	jo	Parked in a special enforcement area adjacent to a footway, cycle track or verge lowered to meet the level of the carriageway	Higher	
28	jo	Parked in a special enforcement area on part of the carriageway raised to meet the level of a footway, cycle track or verge	Higher	
30	fjlmnopsu	Parked for longer than permitted	Lower	
31	j	Entering and stopping in a box junction when prohibited	n/a	London only
32	jdtw	Failing to drive in the direction shown by the arrow on a blue sign	n/a	Code-specific suffixes apply. London only
33	jbcefgghikqrs	Using a route restricted to certain vehicles	n/a	Code-specific suffixes apply. London only
34	j0	Being in a bus lane	n/a	
35		Parked in a disc parking place without clearly displaying a valid disc	Lower	
37	j	Failing to give way to oncoming vehicles	n/a	London only
38	jlr	Failing to comply with a sign indicating that vehicular traffic must pass to the specified side of the sign	n/a	Code-specific suffixes apply. London only
40	n	Parked in a designated disabled person's parking place without displaying a valid disabled person's badge in the prescribed manner	Higher	
41	j	Parked in a parking place designated for diplomatic vehicles	Higher	
42	j	Parked in a parking place designated for police vehicles	Higher	
43	j	Stopped on a cycle docking station parking place	Higher	
45	n	Parked on a taxi rank	Higher	
46	jn	Stopped where prohibited (on a red route or clearway)	Higher	
47	jn	Stopped on a restricted bus stop or stand	Higher	

48	j	Stopped in a restricted area outside a school, a hospital or a fire, police or ambulance station when prohibited	Higher	
49	j	Parked wholly or partly on a cycle track or lane	Higher	
50	jlru	Performing a prohibited turn	n/a	Code-specific suffixes apply. London only
51	j	Failing to comply with a no entry sign	n/a	London only
52	jgmsvx	Failing to comply with a prohibition on certain types of vehicle	n/a	Code-specific suffixes apply. London only
53	j	Failing to comply with a restriction on vehicles entering a pedestrian zone	n/a	London only
54	j	Failing to comply with a restriction on vehicles entering and waiting in a pedestrian zone	n/a	London only
55	j	A commercial vehicle parked in a restricted street in contravention of the Overnight Waiting Ban	Higher	
56		Parked in contravention of a commercial vehicle waiting restriction	Higher	Non- overnight waiting restriction
57		Parked in contravention of a bus ban	Higher	Non- overnight waiting restriction
58		Using a vehicle on a restricted street during prescribed hours without a valid permit	n/a	London Lorry Control Scheme
59		Using a vehicle on a restricted street during prescribed hours in breach of permit conditions	n/a	London Lorry Control Scheme
61	124cgj	A heavy commercial vehicle wholly or partly parked on a footway, verge or land between two carriageways	Higher	Code-specific suffixes apply.
62	124cgj	Parked with one or more wheels on or over a footpath or any part of a road other than a carriageway	Higher	Code-specific suffixes apply.
63	c	Parked with engine running where prohibited	Lower	This contravention occurs in certain coach bays.
64	124	Parked in contravention of a notice prohibiting leaving vehicles on a grass verge, garden, lawn or green maintained by a local authority	n/a	Code-specific suffixes apply. For use in Essex only
65	124	Parked in contravention of a notice prohibiting leaving vehicles on land laid out as a public garden or used for the purpose of public recreation	n/a	Code-specific suffixes apply. For use in Essex only.
66	124cg	Parked on a verge, central reservation or footway comprised in an urban road	n/a	Code-specific suffixes apply. For use in Exeter only.
99	jo	Stopped on a pedestrian crossing or crossing area marked by zigzags	Higher	Pedestrian Crossings

Off-Street

Code	General suffix(es)	Description	Diff. level	Notes
70		Parked in a loading area during restricted hours without reasonable excuse	Higher	Off-street loading areas
71		Parked in an electric vehicles' charging place during restricted hours without charging	Higher	Off-street car parks
73	u	Parked without payment of the parking charge	Lower	Off-street car parks
74	prs	Using a vehicle in a parking place in connection with the sale or offering or exposing for sale of goods when prohibited	Higher	Off-street car parks
77		--- RESERVED FOR DVLA USE ---	n/a	
80	u	Parked for longer than the maximum period permitted	Lower	Off-street car parks
81	o	Parked in a restricted area in a car park	Higher	Off-street car parks
82	puv	Parked after the expiry of paid for time	Lower	Off-street car parks
83		Parked in a car park without clearly displaying a valid pay & display ticket or voucher or parking clock	Lower	Off-street car parks
84	u	Parked with payment made to extend the stay beyond initial time	Lower	Off-street car parks
85	btrw4	Parked in a permit bay without clearly displaying a valid permit	Higher	Off-street car parks
86	prs	Not parked correctly within the markings of a bay or space	Lower	Off-street car parks
87		Parked in a designated disabled person's parking place without displaying a valid disabled person's badge in the prescribed manner	Higher	Off-street car parks
89		Vehicle parked exceeds maximum weight or height or length permitted in the area	Higher	Off-street car parks
90	psuv	Re-parked in the same car park within one hour after leaving	Lower	Off-street car parks. "one hour" may be varied to another time period or "the prescribed time period"
91	cg	Parked in a car park or area not designated for that class of vehicle	Higher	Off-street car parks
92	o	Parked causing an obstruction	Higher	Off-street car parks
93		Parked in car park when closed	Lower	Off-street car parks
94	p	Parked in a pay & display car park without clearly displaying two valid pay and display tickets when required	Lower	Off-street car parks. "two" may be varied to another number or "multiple"
95		Parked in a parking place for a purpose other than the designated purpose for the parking place	Lower	Off-street car parks
96	c	Parked with engine running where prohibited	Lower	Off-street car parks - occurs in certain coach bays

Optional Suffixes

Suffix	Meaning	Suffix	Meaning	Suffix	Meaning
a	temporary traffic order	n	red route	1	electric vehicles bay
b	business bay	o	blue badge holder	2	goods vehicle loading bays
c	buses only	p	pay and display	3	bicycle bay
d	doctors' bay	q	market traders' bay	4	virtual permit
e	car club bay	r	residents' bay	5	dedicated disabled bay
f	free parking bay	s	shared use bay	6	hotel bay
g	motorcycle bay	t	pay and display ticket used in permit bay		
h	hospital bay	u	electronic payment		
i	wrong type of voucher	v	voucher		
j	camera enforcement	w	wrong parking zone		
k	ambulance bay	x	incorrect VRM		
l	loading place	y	obscured/illegible permit		
m	parking meter	z	out of date permit		

 Brent	Scrutiny Committee 8 th October 2015 Report from the Operational Director – Strategic Commissioning
For decision	
Complaints Annual Report 2014 - 2015	

1.0 Summary

1.1 This report provides an overview of corporate complaints received by the Council during the period April 2014 to March 2015. Complaints concerning the Adult Social Care and Children and Young People Departments come under separate statutory complaint procedures. Legislation requires those services to produce annual reports. These are included as appendices A and B to this report and provide a detailed analysis in respect of each department. Headline figures for those departments have been included in the body of this report, for the purposes of comparison.

2.0 Recommendations

Members of the Scrutiny Committee are recommended to:-

- 2.1 consider and comment on the council's performance in managing and resolving complaints.
- 2.2 note the actions being taken to improve response times to complaints and reduce the number of complaints which escalate to the final review stage.

3.0 Headlines

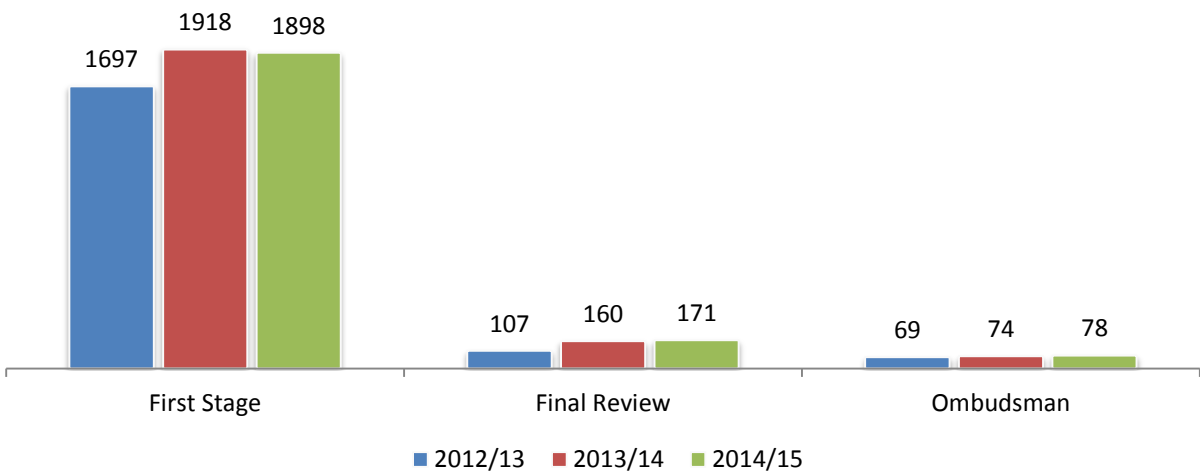
- A total of 1898 first stage complaints were received between April 2014 and March 2015, representing a reduction of 20 on the previous year.
- A total of 1717 complaints were successfully resolved at the first stage, representing 91% of the total investigated. This is in line with the previous years' result, however it is 3% higher than that achieved in 2012/13.
- 38% of the final stage investigations resulted in the complaint being fully or partly upheld, indicating some degree of fault with the earlier investigation
- 278 first stage complaints were resolved within 5 working days or less, which saved the Council the staff costs associated with a full investigation.
- With the exclusion of Brent Housing Partnership, 77% of first stage corporate complaints were responded to on time, up from 74% the previous year. This is still considerably below the Council's performance target of 100% within the deadline.
- 74% of complaints were made on-line, up from 70% the previous year. 35% of customers recorded their complaint directly onto the Council's complaints database.
- Compensation awards increased by £56k to £78k with slightly more awarded at the final stage in comparison with first stage complaints
- iCasework became the sole IT system for recording/managing complaints received by the Council and Brent Housing Partnership with effect from November 2014,
- Service improvements identified through complaint investigations helped make the Council a stronger organisation

4.0 Detailed Considerations

4.1 A total of 1898 first stage complaints were received between April 2014 and March 2015, representing a reduction of 20 on the previous year. A total of 1717 complaints were successfully resolved at the first stage, representing 91% of the total investigated. This is in line with the previous years' result, however it is 3% higher than that achieved in 2012/13.

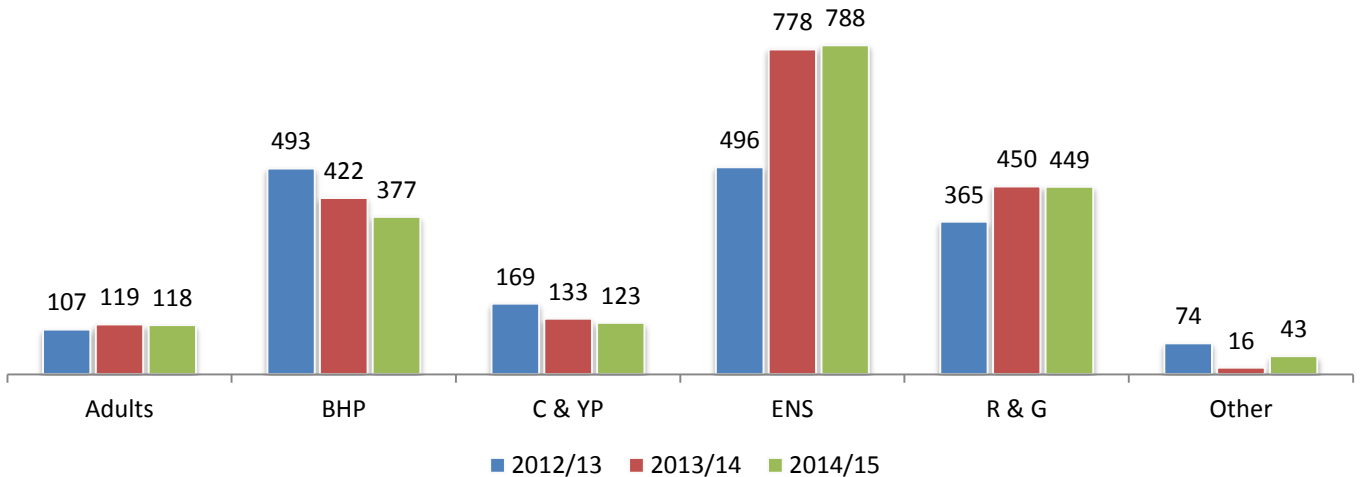
4.2 Although response rates improved marginally, there were still a significant number of complaints not responded to within the deadline. This report comments on the steps that are being taken to improve response times and what needs to be done to address the rise in escalated complaints experienced over the past two years.

4.3 Graph 1: Complaints received in comparison with previous years



4.4 BHP and Regeneration and Growth experienced significant rates of complaints escalating from stage 1 to 2 at 14% and 15% respectively. This contrasts with Environment and Neighbourhoods, which had an escalation, rate of less than 5%. The rate of escalation and what can be done to reverse this trend is discussed further on in this report.

4.5 Graph 2: First stage complaints received by departments



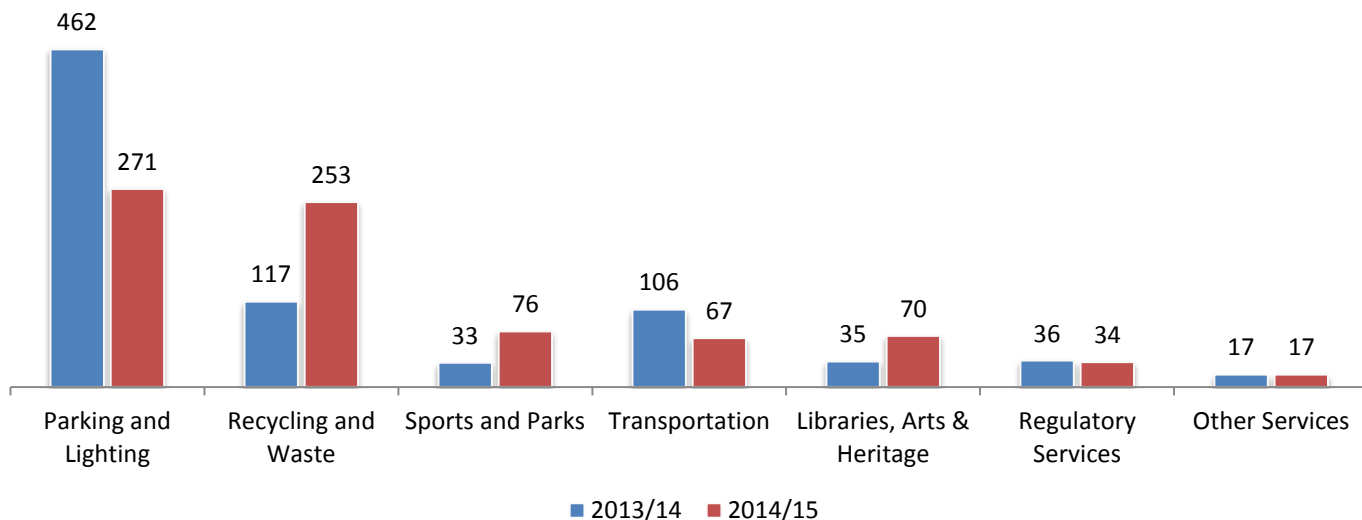
4.6 A further breakdown of complaints affecting the two departments that receive most complaints is provided below. Environment and Neighbourhoods accounted for a high proportion of the total

complaints received by the Council, which continued the trend from the previous year. This is largely a reflection of the customer facing services for which that department is responsible. The column headed “Other”, in the main relates to complaints relating to Legal and the Finance Service Centre.

4.7 Breakdown of Environment & Neighbourhood Services complaints

Parking and Lighting and Recycling and Waste accounted for two-thirds of the complaints the Department received. A further analysis of complaints relating to those services is set out in the pie charts below. Parking and lighting complaints reduced by 195 in comparison with 2013/14 and reflects the ‘bedding down’ of the ‘virtual permit’ initiative which gave rise to a large number of complaints when introduced in 2013. In addition improved recording practices, meant that customers raising concerns about Penalty Charge Notices, were correctly directed to the appeal process, when previously they had been recorded as ‘complaints’. Recycling and Waste complaints increased by 136 in comparison with 2013-14. Analysis has revealed that the increase is largely due to customer dissatisfaction with the Council’s decision to introduce charging for the collection of garden waste, which has proved controversial with some residents.

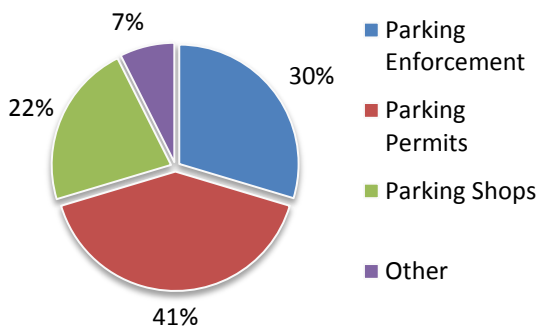
Graph 3 : Environment & Neighbourhood Services complaints



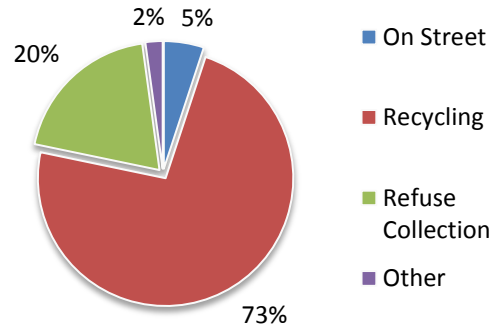
4.8 Spotlight on Parking and lighting and Recycling and Waste

The move away from a manual to an on-line service for ordering permits is reflected in the complaint figures, as are those relating to the closure of the parking shops. Many residents preferred the traditional method for ordering permits via the parking shops. Complaint numbers reduced as residents became more used to the on-line system. Turning to Recycling and Waste, a high proportion of the complaints recorded under the Recycling category, relate to customer dissatisfaction with the Council’s decision to introduce charging for garden waste.

Graph 4 (a) Parking and lighting



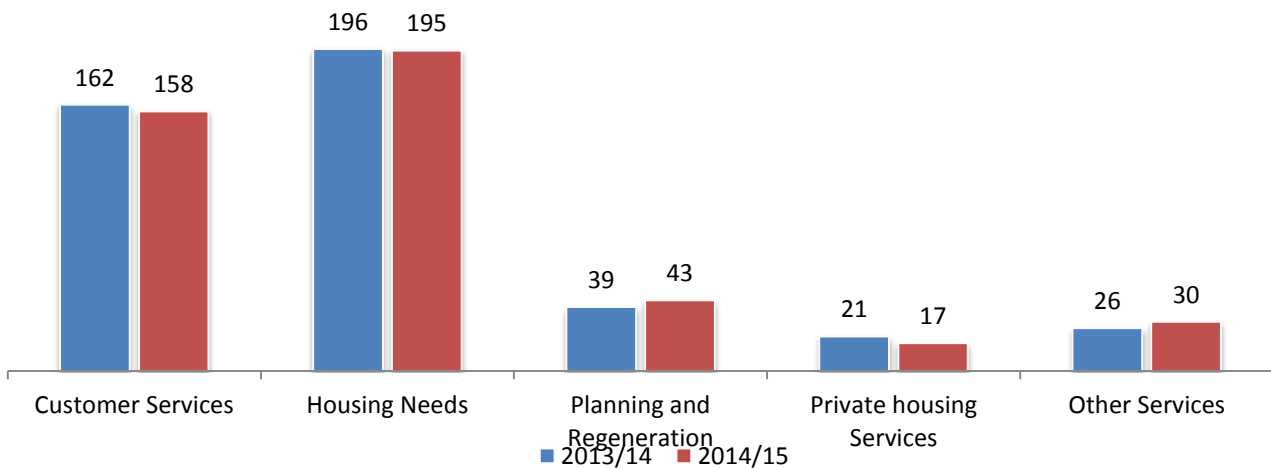
Graph 4 (b) Recycling & Waste



4.9 Breakdown for Regeneration & Growth

With a total of 195 complaints, Housing Needs continued to attract the Department’s largest number. This is not surprising given the increasingly challenging nature of their work and the inclination of customers to use the complaints process in the hope of having a housing decision reviewed. Customer Services encompasses the contact centre and a range of other customer facing services, therefore, the number should be seen in the context of the high volume of customer contacts the service experiences on a daily basis. A further breakdown of the figures for Customer Services and Housing Needs is set out in the charts below.

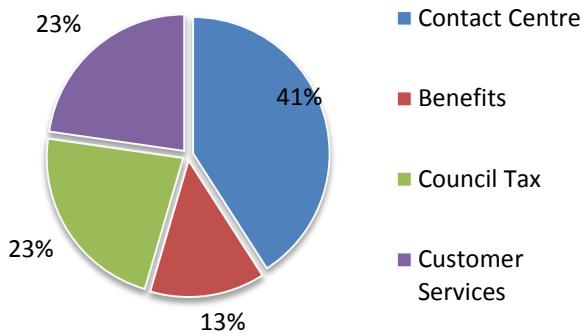
Graph 5: Regeneration and Growth complaints



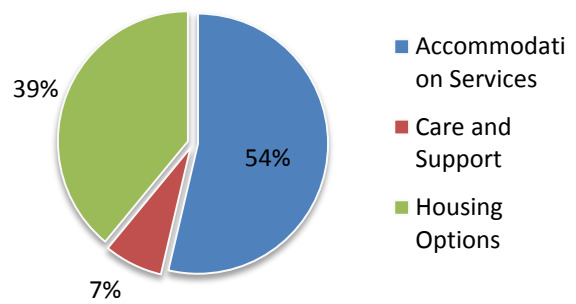
4.10 Spotlight on Customer Services and Housing

A total of 65 complaints related to the Contact Centre and concerned dissatisfaction with the time taken to get through the service, or concerns about how they were dealt with by the officer. This is a low number of complaints, bearing in mind the service handles 30,000 customer enquiries each month. Housing Benefits received 36 complaints, which again is a small number bearing in mind the large number of customers and claims they deal with. Accommodation Services accounted for 54% of the complaints received by Housing Needs, and reflects the pressures the service experienced in sourcing suitable temporary accommodation. The Housing Options figure reflect the pressures associated with the severe shortage of suitable and affordable accommodation within the Borough coupled with the need to place many families out of Borough.

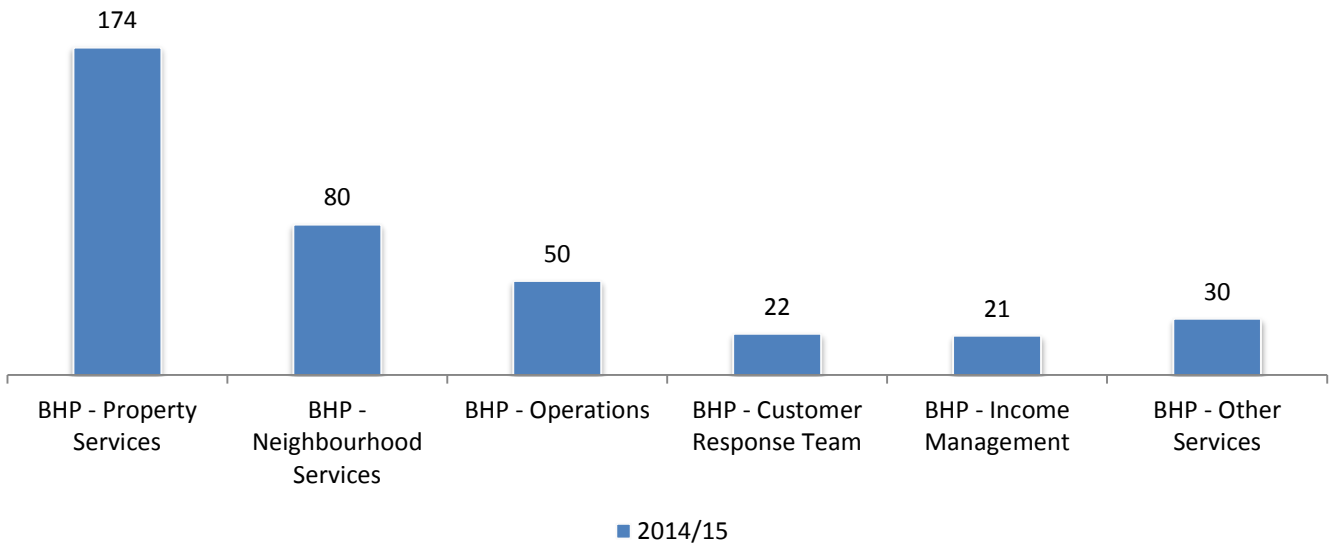
Graph 6 (a) Customer Services



Graph 6 (b) Housing Needs

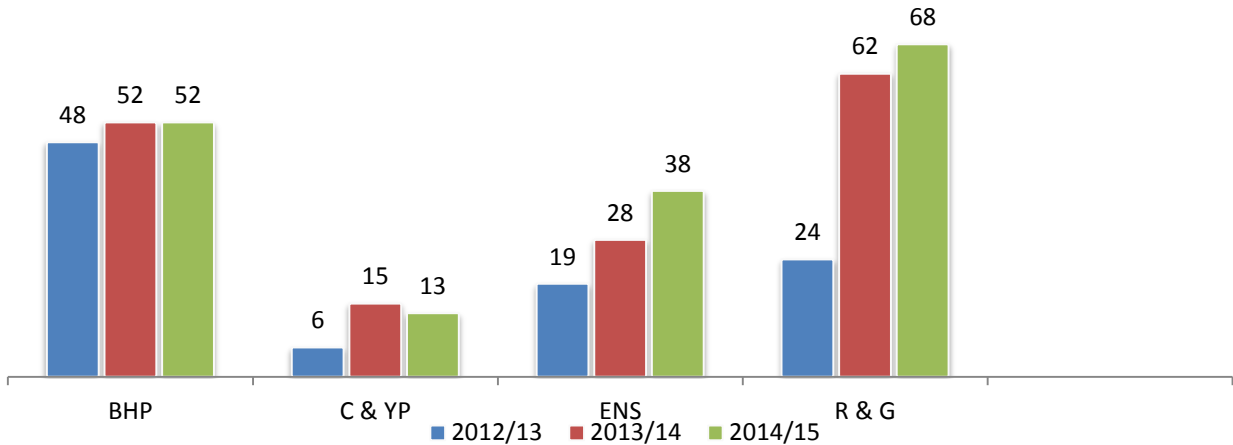


4.11 Graph 7: Breakdown of BHP complaints



4.12 The 174 Property Services complaints were overwhelming repairs related, as has been the case in previous years. Typically, complaint concern dissatisfaction with the time taken to carry out a repair, or with the quality of the work provided. It should be noted that repairs-related complaints fell by 129 in comparison with the previous year. During the year, BHP introduced a new approach to responding to reports from tenants about outstanding repairs. The new procedure, involves BHP seeking to arrange 'straightforward' repairs to be carried out within 48 hours of the tenant making the report. Previously, these issues would have been recorded as complaints. Neighbourhood services, incorporates tenancy management. Many of their complaints were from tenants dissatisfied with the actions or lack of actions BHP had taken in connection with reports of neighbour nuisance or anti social behaviour.

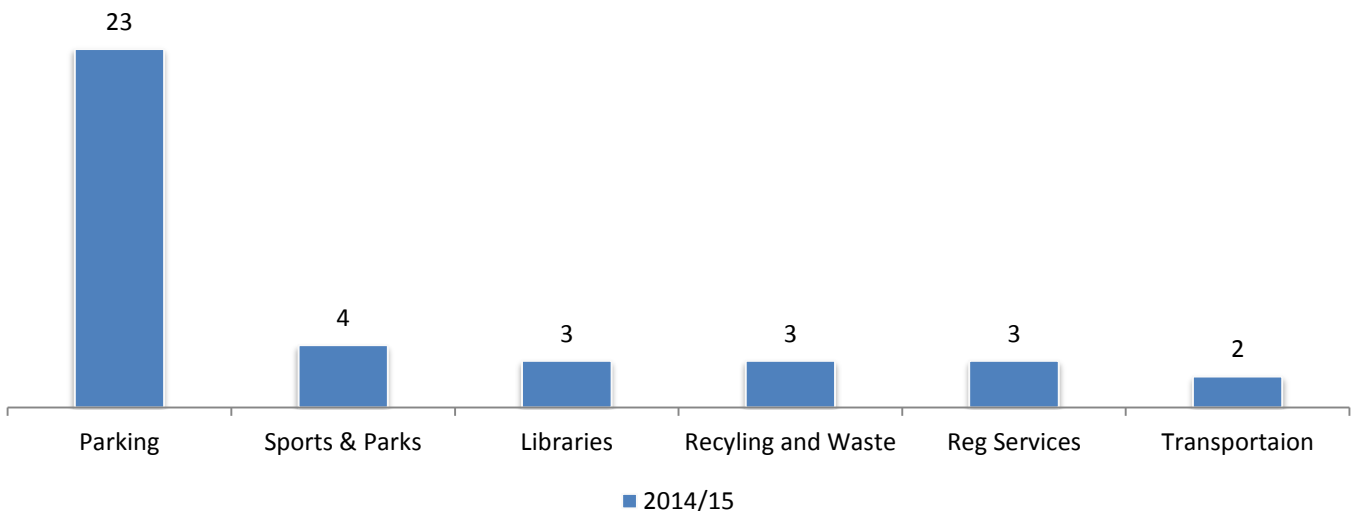
4.13 Graph 8: Final Review complaints received



4.14 A total of 171 final review investigation requests were received, representing an escalation rate of 9%, which was consistent with the previous year, although it should be noted that this is 3% higher compared to 2012/13. Regeneration and Growth accounted for 68 of the final review complaint investigations, with Housing Needs (31) and Planning (20) receiving the most. The majority of Environment and Neighbourhoods final review complaints related to Parking and Lighting (23).

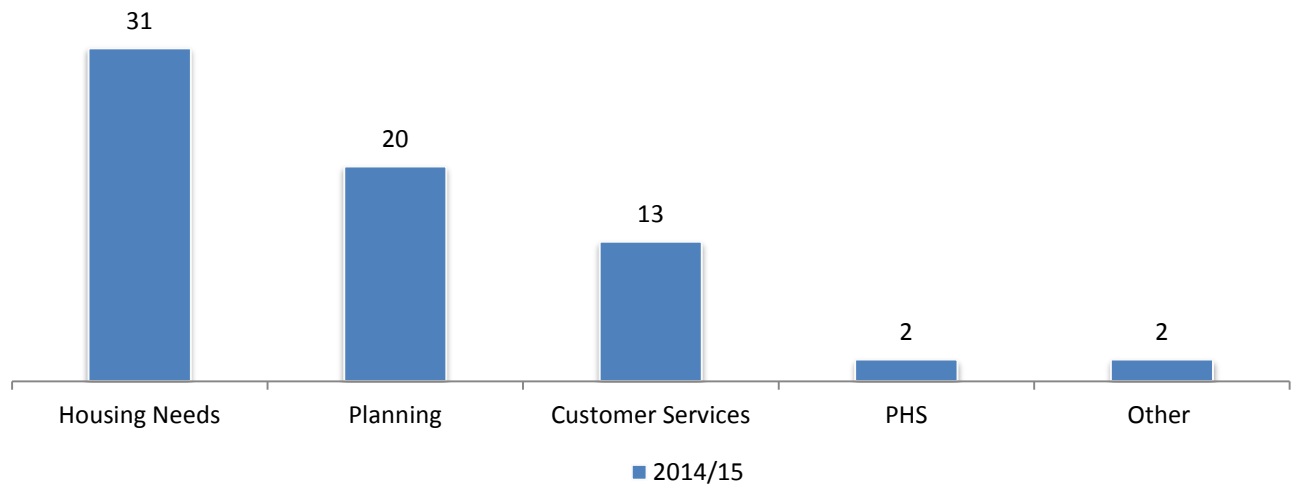
4.15 A detailed breakdown of complaints received for the two departments is below. The Council received 52 final stage escalation requests relating to BHP, representing an escalation rate of 14%, which is higher than the average for the Council. Two-thirds of these complaints (35 in total), were upheld when investigated at the final stage. These factors indicate that the first stage investigations failed to adhere to the requirements set out in the complaint investigation standard. This is commented on further in section 3.7 and 3.8 of this report.

4.16 Graph 9 : Breakdown of escalated complaints for Environment and Neighbourhoods



4.17 There was an overall increase of 10 escalated complaints compared with 2013-14. 'Parking' complaints, which encompasses issues relating to parking enforcement, and residents/visitor permits increased by 7. This made Parking and Lighting's escalation rate 8%. This is still below the Council average. Of the 23 parking and lighting complaints considered at the final review stage only 8 resulted in the complaint being fully or partly upheld.

4.18 Graph 10: Breakdown of escalated complaints for Regeneration and Growth



4.19 Housing Needs, had the largest number of escalated complaints, with 31 escalating to the final stage of the complaints process, representing an escalation rate of 15%. Officers frequently have to make difficult decisions that impact on a person's housing situation. Not surprisingly some customers are reacting to what they perceive to be a 'negative' decision by raising complaints and generally using the complaints process as a means to have decisions reviewed. It is worth noting that when considered through the final stage investigation process, two-thirds of escalated Housing Needs complaints were either not upheld or had insufficient basis to justify a further investigation. Similarly, only 2 out of 20 escalated Planning complaints were subsequently upheld.

4.20 Why complaints escalated

4.21 Analysis of escalated complaints indicates that the reasons why customers considered it necessary to escalate their complaints fell into three main categories:

- Persistent complainants, who disagreed with the stage 1 decision, irrespective of the quality of the decision
- The complainant considered that the initial complaint response had not addressed all the issues they had raised in their complaint
- The complainant considered that the remedy put forward at the initial stage to resolve the complaint was inadequate. A remedy is often represented by financial compensation, although not exclusively so.

4.22 In 61 cases (35% of escalated complaints), the Complaints Service determined that there were insufficient reasons for carrying out a further investigation. In the main, these were the cases referred to above, where the customer had disagreed with the stage 1 decision but had not given sufficient justification for a further full scale investigation to be undertaken. The remaining cases were subject to further investigation because the Complaints Service considered that the earlier investigation had either not addressed the complaint as thoroughly as it should have or had not remedied the complaint appropriately, for example, an insufficient amount of compensation had been awarded.

4.23 As part of its complaints policy, the Council has a Complaint Investigation Standard, which all complaint investigations are required to adhere to. The aim of the standard is to ensure that investigations are carried out to a consistent, high standard, resulting in the customer being less likely to want to escalate their complaint to the second stage. Under the standard, the investigator is required to complete an investigation plan setting out the issues that need to be addressed. The plan should be signed off by the relevant Operational Director or if necessary delegated to the Head of Service before the investigation commences. Based on an analysis of records taken from iCasework, in half of the escalated complaints, the investigation plan had not

been completed to a reasonable standard and agreed by a senior officer, or had not been completed at all. This helps explain why the customer considered that the initial investigation had not addressed all the issues raised and provided a through response. This report recommends that CMT reminds their DMT's of the requirement to adhere to the Complaint Investigation Standard in respect of those investigations that they oversee. Extensive training on the standard has been delivered to officers across the Council and further guidance is available on the complaints webpage and from the Complaints Service Team.

4.24 Table 1: What was the outcome of investigations?

	First Stage						Final Stage					
	Upheld / Part Upheld	%	Not Upheld	%	Early Resolution	%	Upheld / part Upheld	%	Not Upheld	%	Further investigation not necessary	%
Adults	64	56	37	33	14	13						
BHP	191	63	102	34	10	3	35	63	5	9	16	28
C & YP	64	49	46	35	21	16	1	8	11	92	0	0
ENS	272	36	289	38	194	26	8	25	9	28	15	47
R & G	134	33	235	57	43	10	26	35	20	27	28	38
Other	10	30	17	52	6	18	0	0	2	50	2	50
Total	544	38	624	43	278	19	70	39	47	26	61	35

4.25 38% of first stage investigations (544 in total), were upheld or partly upheld, down from 47% the previous year. This remains a relatively high percentage and is a healthy indication of departments' willingness to recognise faults within their respective services and seek to remedy them at an early stage. It is important to note that 278 first stage complaints were resolved in five days or less – the table above refers to them as “Early Resolution” cases. The early resolution approach was introduced two years ago in recognition of the fact that many complaints have the potential to be resolved quickly, thereby avoiding the costs in management time etc. associated with a full investigation.

4.26 Out of 178 final stage complaints considered by the Complaints Service Team, 70 resulted in the complaint being fully or partly upheld. This represents 39% of all final stage cases considered, and compares with 30% in 2013/14 and 19% in 2012/13. In effect, these complaints represent those where the further investigation found some degree of fault with the stage 1 decision and by implication, the stage 1 investigation.

4.27 35 out of the 56 final stage investigations involving BHP were fully or partly upheld. This is an especially high figure when compared with the Council average of 30%, and highlights the need for the service to adhere to the complaint investigation standard referred to earlier. The Complaints Team has delivered complaints training to BHP and will be working with BHP further to develop an action plan designed to improve the quality assurance aspect of BHP's investigations.

4.28 When an escalation request is received, the Complaints Team undertakes an assessment of the complaint to determine whether a further full investigation is warranted. Where we are fully satisfied that the Stage 1 investigation had been conducted thoroughly and there is no new evidence or information presented, we explain this to the customer, and inform them of their right to go to the Ombudsman. Following assessment, 35% of escalation requests fell into this category. This approach, which was introduced two years ago, helps ensure that investigation resources are focused on those complaints where there is a possibility that the initial investigation and decision was incorrect or incomplete in some way.

4.29 Complaints where the Local Government Ombudsman 'upheld' a complaint against the Council

Two years ago, the Ombudsman revised their process for recording the outcome from investigations.

- In brief, where the Ombudsman considers that there was some fault in the Council's actions that led to the complaint arising in the first place, they will record a decision of "Upheld". Crucially, this is irrespective of whether they are satisfied that the Council has taken the appropriate action to remedy the complaint through its own complaints procedure. In other words, the Council's complaints procedure may already have identified and fully resolved a problem, but if the complaint goes to the Ombudsman for a further decision, they will record it as 'upheld', despite their intervention having added no further value.
- In their annual letter, the Ombudsman reported 23 'upheld' complaints involving Brent, 5 of which had not been through the Council's complaints procedure, and therefore the Council had had no opportunity to resolve them, before they reached the Ombudsman.
- 5 complaints concerned Adult Social Care and a further 5 related to the Children and Young People's Department. Details of those cases are included in the two annual reports, attached as appendices to this report. Of the remaining 13 complaints: 6 related to Housing Needs, 2 Council Tax recovery, 1 Housing Benefits, 2 parking enforcement, 1 concerned cemeteries and 1 Planning case.

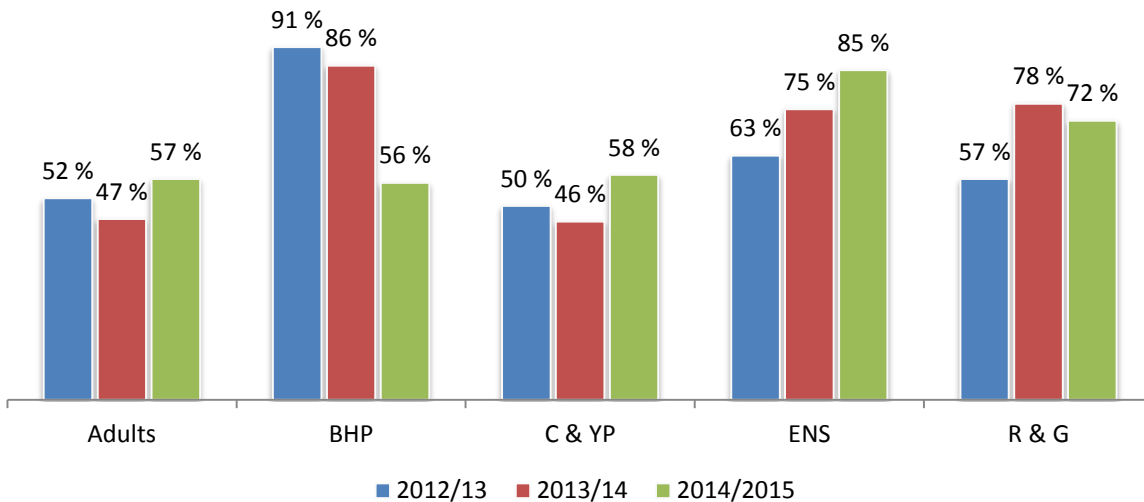
4.30 Of the 13 cases there were 3 cases where the Ombudsman considered more needed to be done to remedy the complaints. A summary of those cases is outlined below.

4.31 Council Tax recovery – The Ombudsman asked the Council to write off Council Tax arrears of £170 on the basis that the customer had been sent several conflicting account balances. The final stage investigation had upheld the complaint but did not consider that it was necessary to wipe out the debt

4.32 Council Tax recovery – a bailiff's failure to carry out an up to date check of a vehicle's ownership before levying distress, resulted in the Council being criticised. The vehicle had been in the ownership of the debtor when the debt was first referred to the bailiff, however by the time the bailiff attempted to seize and remove the car, ownership had been transferred. The Ombudsman considered that a check should have been made with the DVLA immediately prior to seeking to remove the vehicle.

4.33 A Homeless family's - excessive stay in Bed and Breakfast accommodation – This resulted in an increase in the compensation award. - Government guidance stipulates that families should not be placed in bed and breakfast for more than 6 weeks. Because of the severe shortage of suitable alternative accommodation, London Council's Councils find meeting this expectation a challenge. In this particular case, the family had spent approximately 4 months in bed and breakfast accommodation. In recognition of this, £350 was awarded at the final review stage. The Ombudsman considered that £250 per month was an appropriate amount.

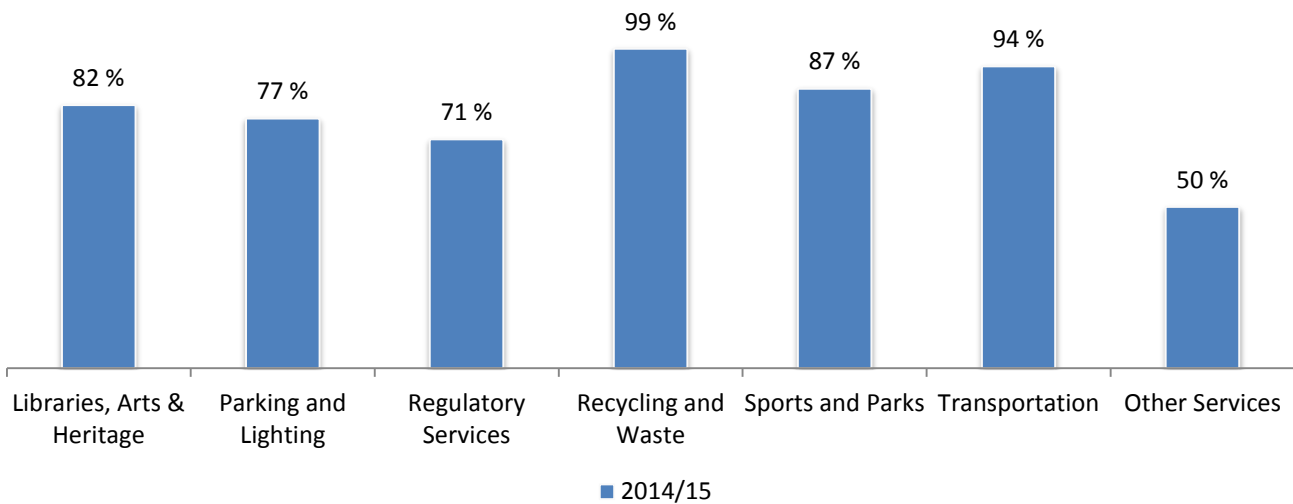
4.34 Graph 11: First stage complaint response times - percentage sent within the deadline



4.35 The Council has a deadline of replying to first stage corporate complaints and Adult Social Care complaints within 20 working days. The equivalent figure for Children and Young People is 10 working days, although legislation does allow the deadline to be extended to 20 working in complex cases. During 2014/15 the Complaints Service implemented a number of initiatives to help departments to improve their performance in meeting the deadline. The complaints database sends an ‘advance’ reminder to the relevant investigator, 3 working days before the response is due. Weekly lists showing all open complaints are circulated to Service Heads and Operational Directors. The Complaints Manager liaised directly with investigators and managers in order to chase outstanding responses and attended weekly meetings with several heads of service, including the Head of the Housing Needs Service and the Operational Director (social care) for Children and Young People, at which performance was reviewed. What the above graph makes clear however, is that overall response rates during the years were significantly below the Council’s target of responding to all complaints within the deadline.

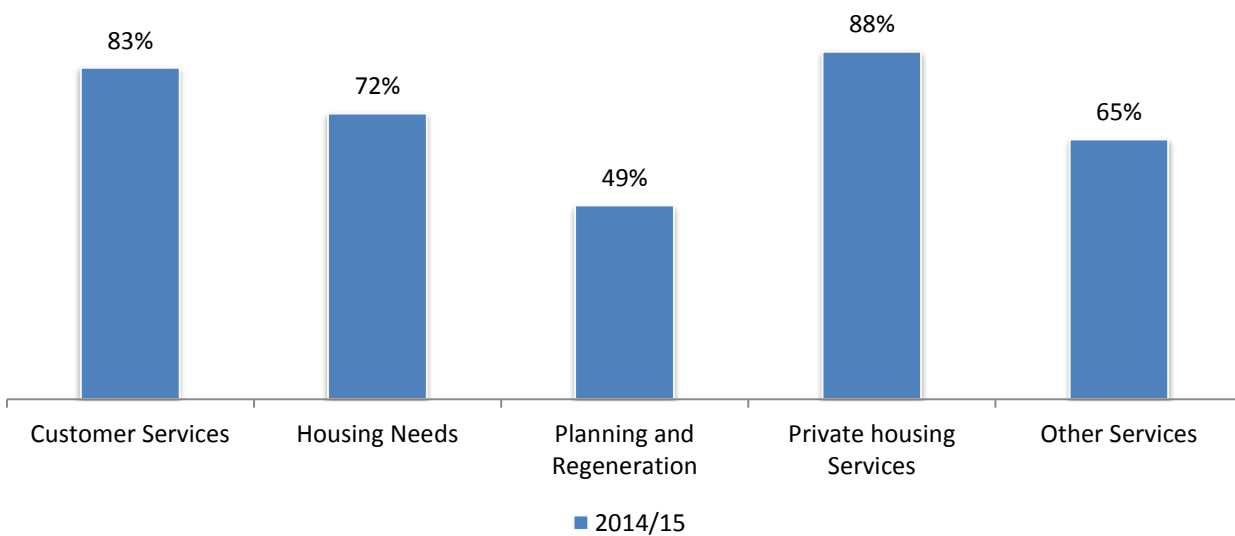
4.36 The position since January 2015 has improved considerably. By the end of quarter 1 2015/16, Children and Young People’s performance had risen to 96% on time, Adult Social Care – 85% and Regeneration and Growth and the Chief Operating Officer’s Department both answered 94% on time. It is essential that these improvements in performance are maintained . CMT members are therefore asked to ensure that focus is maintained by including complaints performance as a standing item on their respective DMT agendas.

4.37 Graph 12: Environment and Neighbourhoods – first stage complaint responses in time, by service area



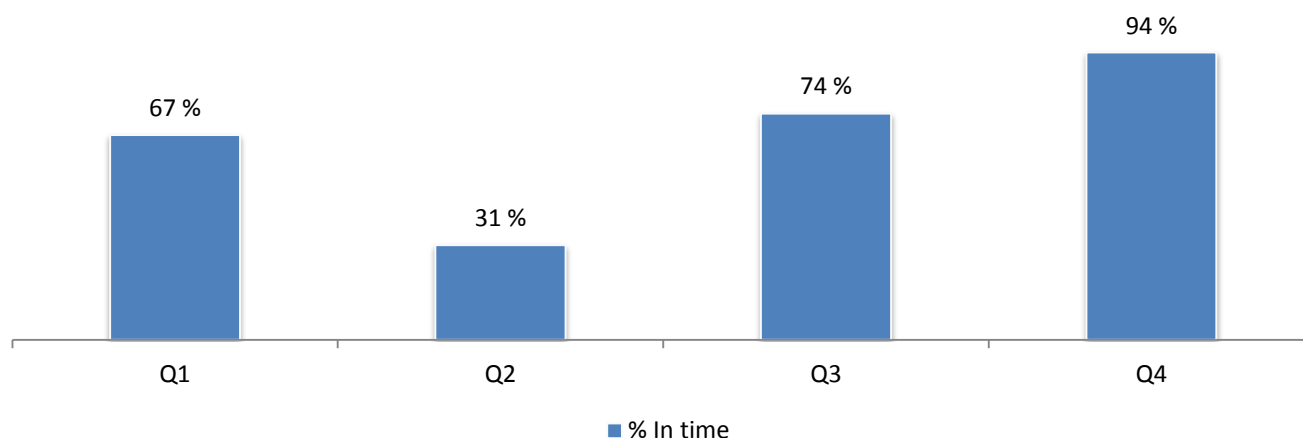
4.38 Parking and Lighting and Recycling and Waste accounted for two-thirds of the Department's Complaints. Parking and Lighting's performance was adversely affected by significant staff changes during the year, which impacted on the ability of the service to respond promptly to complaints and appeals. Effective arrangements were put in place however which resulted in performance improving with 87% of complaints being responded to on time in Q4 and 92% in Q1 of 2015/16. Recycling and Waste had a consistently good performance throughout the year, as can be seen by the graph.

4.39 Graph 13: Regeneration and Growth - responses in time, by service area



4.40 Housing Needs received 195 out of the Departments 499 complaints. This is a reflection of the challenging nature of the area of work the service deals with. In addition to large numbers of complaints they also receive a high number of Member enquiries. The Head of Service worked closely with the Complaints Service Team to improve performance. Weekly meetings have been established between the Head of service and the Complaints Manager at which performance reports are generated and all outstanding complaints are reviewed. Further targeted complaints investigation training was also provided to key officers from the service. By the end of Q1 2015/16, 98% of complaints were being responded to on time. The Planning Service's performance was disappointing given that they only received 43 complaints. However their performance had improved to 86% by the end of Q1 2015/16.

4.41 Graph 14: Final Review complaint response times by quarter



4.42 The Complaints Service Team experienced a backlog of complaint investigations during the year, which is reflected in the above figures. More stringent performance management measures were put in place which resulted in the backlog being cleared in the latter part of the year and performance improving significantly in Q's 3 and 4. The improvement has been maintained in 2015/16.

4.43 Table 2: Compensation paid in connection with complaints

Area	First Stage		Complaint Numbers 2014/15	Final Stage		Complaint Numbers 2014/15
	2013/14	2014/15		2013/14	2014/15	
Adults	£6,065.10	£4,950.00	2	£2,600.00	£750.00	5
BHP	£620.00	£8,092.52	44	£2,403.12	£22,524.22	30
C & YG	£2,374.44	£8,200.00	3	£1,450.00	£1,000.00	4
ENS	£719.06	£14,863.03	10	£1,122.11	£1,510.00	4
R & G	£2,968.91	£4,214.99	14	£6,193.88	£13,184.15	19
Other	£0.00	£130.00	2	£625.00	£306.50	5
Total	£12,747.51	£38,726.54	61	£14,394.11	£39,274.87	67

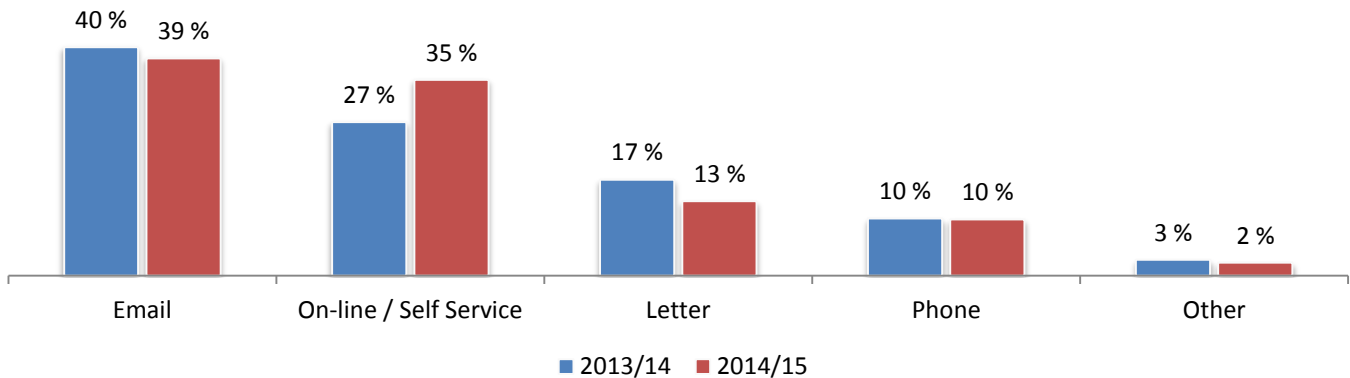
4.44 The Council's policy on compensation is closely modelled on guidance provided by the Ombudsman. Compensation is awarded in cases where upon investigation it is found that the Council's incorrect actions or failure to act or delay in acting has resulted in the person being seriously affected. For example the person may have incurred costs and/or suffered financial hardship because of our mistake or they may have experienced significant distress and inconvenience. Compensation awarded in appropriate complaints makes good business sense for the Council because it reduces the likelihood of a complaint escalating and therefore avoids the cost and reputational damage associated with escalated complaints and the intervention of the Ombudsman. The total amount of compensation awarded in 2014/15 increased by £56k compared to 2013/14. As the table above shows, more compensation was awarded at the final investigation stage than at the first stage. This is especially evident in the cases of BHP and R&G and may indicate that managers are reluctant to award compensation, or that investigators are unaware that they can recommend a compensation award as part of the overall remedy to a complaint.

4.45 A failure to adequately remedy a complaint is one of the underlying reasons for complaints escalating. Therefore, CMT is asked to remind members of the importance of adhering to the remedies policy where it is found that the customer has experienced an injustice because of the Council's actions or lack of action.

4.46 How complaints were received

Encouraging customers to make their complaints on-line has led to a significant increase in those being received by email and by the iCasework enabled 'self service' facility, which can be accessed via the Council's website. The positive trend in customers making use of the self service facility is especially welcome as it represents the most cost effective method for receiving complaints.

Graph 15: Method of receipt



4.47 Service Improvements resulting from complaint investigations

4.48 Issues raised through complaints or highlighted through investigations are driving the Council's Service improvement agenda and are an important form of Business Intelligence. Some examples of improvements resulting from complaints received during the year are set out below. Those relating to the Adult Social Care and Children and Young People's departments are reported in the appendices to this report.

4.49 Ensuring we comply with the law when dealing with homelessness applications from customers with dependent children – serious failings in how a homeless application from a family with young children was handled, resulted in the family sleeping in their car for a number of days. The family approached Housing Needs, on the basis that they would shortly be made homeless. They were offered temporary accommodation, which the husband/wife declined on the basis that it needed some minor repairs. Housing Needs determined that by refusing the accommodation, the family were intentionally homeless and issued a decision to that effect.

The first error was that Housing Needs failed to inform the family of their right to request a review of the decision. Officers did not take sufficiently accurate notes of what occurred, and incorrectly assumed the husband was the homeless applicant, when in fact it was the wifen. This compromised the quality of decision-making in this case. Furthermore, because young children were involved, Housing Needs should have informed Children's social care of the decision, which they failed to do. Had they done so, social care may have been able to arrange alternative accommodation for a short period. The significant lessons arising from this case, were reviewed by the Head of Service, and led to further staff training, procedures being revised, and more effective liaison arrangements between Housing and Children's social care being put in place. The overall service Housing Needs are able to offer families with young children has improved and no further complaints of this nature have been received.

4.50 Improving the management of adaptation works for tenants with disabilities - a number of vulnerable BHP tenants had cause to complain about the poor management of the works designed to make their properties more suited to their needs. Two final stage investigations revealed that the management and monitoring arrangements had been inadequate, resulting in excessive delays and schemes overrunning .This contributed to the costs exceeding the amount

budgeted. As a result of the final stage investigations, a far more robust management and monitoring framework was put in place. The long term impact of this improved approach is currently being determined.

- 4.51 Reducing the time that properties remain unavailable for letting because of outstanding repairs - an investigation, into a BHP complaint revealed that due to inadequate systems in place for monitoring the progress of repairs, a vacant property had been left in a state that prevented it from being made available to families seeking accommodation, for over a year. The property had experienced a fire. The elderly tenant had been hospitalised. Although a programme of works to make the property habitable had been identified, these were delayed and subsequently lost track of while BHP and Adult Social Care discussed the long term future of the tenant. It was only after complaints were received from neighbours, about the state of the property, that action was taken to progress the repairs. The investigation led to an improved process for monitoring the progress of repairs, with monthly monitoring meetings now taking place between BHP and contractors.
- 4.52 Improved training for customer-facing staff - Dissatisfaction with the perceived attitude or conduct of staff who deal directly with customers, was a theme in a number of complaints. By way of illustration, one complaint concerned two members of the library staff who were reported by a customer for being overheard swearing. The Head of Libraries took prompt action to address the issue with the staff concerned and further guidance was issued to staff which stressed the importance of demonstrating professional conduct at all times. With many customer facing Council services delivered by partners, the importance of those partners adhering to the Council's customer service standards is a key issue. In one Waste and Recycling related complaint, the customer complained that they had been spoken to in a rude manner by an operative, in response to a request for an additional recycling bin. The complaint led to Veolia's contract manager reminding all staff about the standards of behaviour expected by the Council.
- 4.53 Improving operational procedures - Complaint investigations can often highlight procedures that are outdated or altogether lacking. By way of illustration, a final stage investigation, into a Housing Needs related complaint revealed that inadequate procedures were in place for notifying customers in bed and breakfast that their bookings were being terminated. In this case, a family with young children was given less than 45 minutes notice to leave the accommodation. An improved procedure is now in place and has been circulated to the relevant staff.
- 4.54 Improving communications – poor or inadequate communication is often the cause of complaints. By way of illustration, a failure to inform a temporarily decanted tenant that they had to make their own parking arrangements while at the temporary address, resulted in them receiving several parking tickets. The complaint led to a review of the information provided to decanted tenants, which resulted in an improved information pack being developed. No further complaints of this type were received.
- 4.55 Joined up working between services – There is a clear link between Transportation, which determines parking restrictions within the Borough and Parking and Lighting, which has to enforce those restrictions. A number of complaints concerning a perceived lack of enforcement action in connection with newly introduced parking schemes, resulted in more effective liaison arrangements being put in place between the two services. This enabled Parking and Lighting to be more proactive in ensuring that the need to enforce new schemes is reflected within service delivery plans. This in turn led to a fall in complaints about this subject.
- 4.56 Priorities for 2015– 2016
- 4.57 Improving complaint response times - Response times in a number of departments need to be improved significantly. The Complaints Team will continue to work collaboratively with relevant Operational Directors and Heads of Service to improve performance. CMT is also requested to ensure that improving response rates continues to be given priority status within their respective DMT's.

- 4.58 Implementing the complaints clearing house system - The complaints clearing house represents one of the strategies designed to improve response rates. The concept involves the triaging complaints when first received and weeding out issues that can be dealt with more effectively outside of the complaints process. The approach was piloted successfully during the year in Adult Social Care and Children and Young People Departments as well as in BHP and will be expanded to encompass the rest of the Council during 2015/16.
- 4.59 Reducing the level of escalated complaints - As outlined earlier in this report, there is scope for reducing the number of escalated complaints, together with the proportion subsequently upheld at the final stage, if DMT's ensure that their staff adhere to the complaint investigation standard when conducting first stage investigations. CMT are asked to emphasise to their respective management teams, the importance of all investigations complying with the standard.
- 4.60 Improving the learning capacity of the organisation - A 'Complaint Investigators Mentoring Scheme', will be rolled out in the first half of 2015/16. The concept involves members of the Complaints Team, mentoring carefully selected officers involved in current investigations. It will represent an opportunity for the officers to seek advice and guidance on any aspect of good the investigation practice. The objective will be to ensure that 'a right first time' culture is embedded within service areas, which in turn makes it more likely that the correct outcome will consistently be achieved at the initial stage. This will lead to a further reduction in complaint escalations. The impact of the initiative will be reported in subsequent quarterly reports.

5.0 Financial Implications

- 5.1 Escalated complaints are costly in terms of the amount of management time that often needs to be devoted to an investigation. The actions recommended in this report are designed to reduce the level of escalated complaints and will contribute towards efficiency savings.

6.0 Legal Implications

- 6.1 The Children Act 1989 and supporting regulations provides the statutory framework for managing child social care complaints. The Local Authority Social Services and National Health Service Complaints (England) regulations 2009 is the relevant legislation so far as Adult social care complaints is concerned.

7.0 Diversity Implications

- 7.1 The Council's complaints procedure covers all areas of the Council's service delivery and is available to everyone who lives in, works in or visits the Borough and all service users. With the exception of the Children and Young People department, the Council has been poor at collecting diversity information from complainants. It was hoped that an on line complaints survey introduced in 2013/14 would boost the level of diversity information captured. The survey invited customers to provide feedback on their experiences of making complaints, and at the same time asked for core diversity information. Unfortunately the response to the survey has been very low and therefore the data is incomplete. The complaints service will be working with the Diversity Manager to explore new approaches for capturing this information and more work will be done to emphasise to staff the importance of recording the information at the first point of contact.

8.0 Staffing Implications

None

Contact Officer

Cathy Tyson
Head of Policy and Scrutiny
Strategic Commissioning
Chief Operating Officer's Department

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Appendix A - Children and Young People Department Complaints Annual Report 2014-15

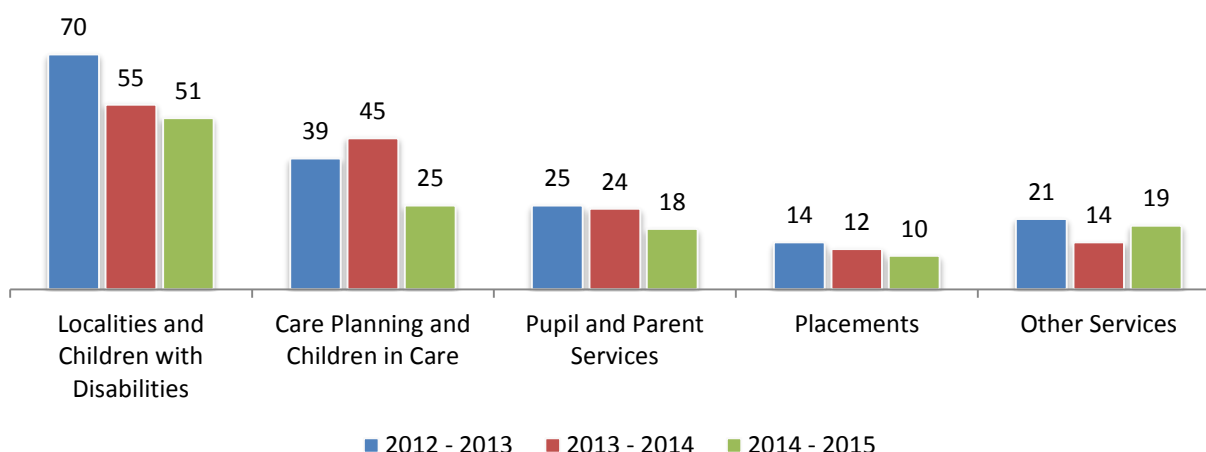
1. Introduction

This report provides an overview of complaints activity across the Department in 2014-15. Where appropriate, comparisons are also made with previous financial years. Appended to this report, is a further brief report, providing an overview of the advocacy support provided to young people who raised complaints about some aspect of the care or support they received during the year.

2. Headlines

- First stage complaint numbers reduced for the third year in succession – an indication of the Department’s ability to resolve issues without the need for a formal complaint investigation
- 58% of first stage complaints were answered within the deadline – up by 12%
- The Department benefitted from several key service improvements that were identified through complaint investigations.
- 70% of customers chose to make their complaint on-line continuing the upward trend in channel migration seen in recent years
- New guidance was launched to raise awareness of complaint process to customers, staff and other stakeholders

3. Number of first stage complaints received



A total of 123 stage 1 complaints were received, 46 less than the previous year. Those listed under Pupil and Parent Services, and ‘Other’, came under the Corporate Complaints Procedure. The remaining complaints came under the statutory complaints procedure. Complaint numbers decreased for the third year in succession, and is a positive indication of the Department’s effectiveness in resolving issues before they become formal complaints.

Breakdown of ‘Other’ services

Service	2012 - 2013	2013 - 2014	2014 - 2015
Youth Support Service	3	2	0
Safeguarding and Quality	3	3	5
Early Years and Family Support	2	4	9
Children’s Commissioning	2	2	0
Alternative Education	0	3	0
School Improvement Service	0	0	4
Transitions (Children’s)	0	0	1
BACES	11	0	0
Totals	21	14	19

The table below provides a more detailed breakdown of complaints received by service area and by quarter.

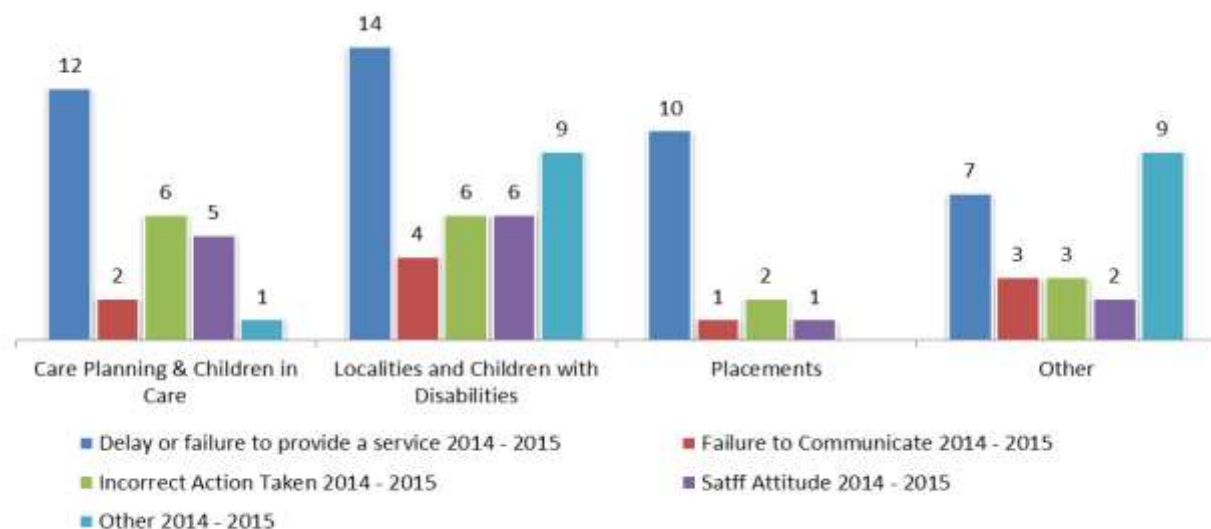
So far as Care Planning is concerned, it is not surprising that the Looked After Children Team attracted the bulk of complaints, in view of the highly sensitive nature of the issues that they deal with. Localities, is the largest of the service areas within the Social Care division, with the greatest degree of customer contact. Their large client base is reflected in the fact that they receive more complaints than other service areas. It should be noted that despite the challenges the Department faces concerning school places, Pupil and Parent services complaint numbers continued to reduce.

Breakdown of service areas for 2014 – 2015

Breakdown of Teams		Q1	Q2	Q3	Q4	Total
Care Planning and Children in Care	Family Adolescent (FAST)	0	1	0	0	1
	Family Assessment (FAIR)	1	0	0	0	1
	Looked after children	2	7	8	5	22
	Transitional Planning	0	1	0	0	1
Localities and Children with Disabilities	Brent Family front door	0	0	2	1	3
	Children with Disabilities	5	2	4	0	11
	Harlesden Locality	1	2	2	6	11
	Kingsbury Locality	1	6	5	2	14
	Kilburn Locality	0	1	1	2	4
	Wembley Locality	1	3	1	2	7
	Willesden Locality	1	0	0	0	1
Placements	Adoption	2	1	0	2	5
	Fostering Support	0	1	1	0	2
	Kinship	0	1	1	1	3
	Recruitment and Assessment	0	0	0	0	0
Pupil and Parent Services	Parent Partnerships	1	0	0	0	1
	School and Department Support	3	1	6	1	11
	School place planning	0	4	0	2	6
	Sensory and Communications	0	0	0	0	0

4. Underlying reasons for complaining

Customers complain for many and varied reasons. For the purposes of analysis, we seek to categorise these reasons under a number of key headings. These include, poor communication, delay in or failure to provide a service, incorrect action taken and staff attitude. Complaints about delays or a failure to provide the service the customer was expecting accounted for half of the complaints received.



Examples of the types of issues that fall under each category, are listed below.

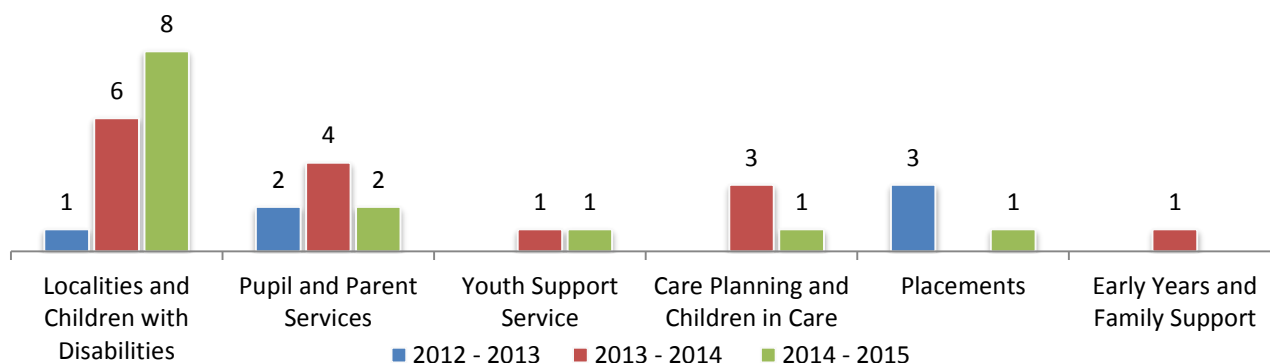
Alleged poor staff attitude - Much of the work of Localities staff involves them in taking actions in connection with highly sensitive child protection or child in need issues, which parents or carers are not in agreement with. These factors undoubtedly have some bearing on the fact that staff attitude is a common theme raised in complaints. One complaint that illustrates this concerned a mother, whose young son had been assessed as a Child in Need. The mother complained that the social worker had been rude to her and had used overly technical language about the processes involved when speaking to the mother, which placed her at a disadvantage. The investigation concluded that the mother had not raised her concerns with the social worker before, however the manager undertook to provide feedback to the social worker.

Delay in the payment of financial support – The complaint concerned a parent of a child with a disability, who complained that her direct payment package had been suspended without notice. The investigation revealed that the payments had been suspended because requested receipts had not been provided and that two warning letters had sent prior to the payments stopping.

Poor communication - A doctor complained about a social worker who failed to respond to several information requests the doctor had made in connection with a young person who was subject to child protection proceedings. The investigation was ongoing at the time of this report.

Incorrect action taken – A parent complained that a social worker had taken incorrect action in referring them to the Troubled Families programme. The complaint investigation identified that the family situation was such that they should not meet the relevant threshold and should not have been referred. An apology was given, and training delivered to relevant staff to enhance understanding of the programme.

5. Stage 2 complaints received



A total of 13 complaints escalated to the second stage, 2 less than the previous year, representing an escalation rate of just over 10%. Most of the escalation requests were received in the first quarter of the year. Various initiatives led by the Complaints Manager, with the support of DMT helped reverse the trend. The quality of first stage investigations was improved through the delivery of a bespoke training programme, and the introduction of a robust quality assurance process involving sign off of the investigation and response by the head of service. In addition resolution meetings were reintroduced, which involves the relevant Head of Service, and the Complaints Manager meeting the complainant, in an attempt to resolve outstanding issues without the need for a further investigation. In the last two quarters of the year, only two escalation requests led to stage 2 investigations being undertaken.

6. Lessons for the Department from complaints escalated to Stage 2

Four of the complaints investigated at Stage 2, resulted in the earlier decision being overturned. A summary of why the complaint escalated and why the stage 1 complaint outcome was overturned is given below.

The importance of applying the correct interpretation of regulations, was highlighted in a complaint, made by a women's refuge, on behalf of a woman with two young children, fleeing domestic violence. The complaint revolved around whether the Department had correctly assessed the 'No access to public funds' regulations. The stage 2 investigation revealed that it had not. The impact of the incorrect interpretation, on the refuge of the incorrect decision had been considerable, as they had had to support the woman through the provision of free accommodation and financial support until such time as the stage 2 complaint had been concluded. As the result of the complaint, further training was delivered to all relevant staff on the regulations.

The importance of addressing all the points raised in a complaint was highlighted through a complaint from a parent whose children were subject to child protection proceedings. The complainant had listed approximately 20 points within the original complaint. The Stage 1 response was brief and focused on one aspect of the overall complaint. The stage 2 complaint comprised of 17 points, of which several were upheld through the subsequent investigation.

Ensuring that the initial investigation is carried out in an impartial manner A complaint from foster carers who complained about the disorganised way in which three children were transported to the airport, revealed that much of the stage 1 complaint response, was largely taken from a statement made by the officer whose actions formed the basis of the complaint. Many of the officer's recollections, did not stand up to scrutiny, when looked at in detail as part of the subsequent stage 2 investigation. The officer's conduct was addressed through supervision, and a detailed procedure was developed specifically to cover the safe transport of children who are in the care of the Council.

7. Stage 3 Complaint Panels

The statutory complaints procedure contains a third stage, which involves a Complaints Panel, overseen by three independent members, a chairperson and two other panel members. The Panel's role is to identify why the customer remains dissatisfied and to make recommendations to the Council concerning whether any further actions should be taken in order to resolve the complaint. Three panels were held in the year. All three complaints concerned the Localities and Children with Disabilities Service.

One complaint concerned what the complainant saw as a failure on the part of the service to respond appropriately to reports of alleged sexual misconduct on the part of the complainant's former partner. The inference being that the Department should have initiated child protection proceedings against the former partner. The stage 1 and 2 investigations concluded that the allegations had been thoroughly investigated at the time and there had been no evidence to support the complainant's view. The Panel agreed with the earlier findings. The complainant subsequently referred the matter to the Ombudsman, who declined to investigate.

A second case was from a parent of a child with severe autism. The nub of the complaint related to the number of hours of respite care that the Department had authorised. The complainant considered that more hours should have been provided in recognition of the family's particular circumstances. The stage 2 investigation had recommended that a fresh assessment of the care package be carried out. The Operational Director agreed to that recommendation. The Panel concluded that the care package was set at the right level.

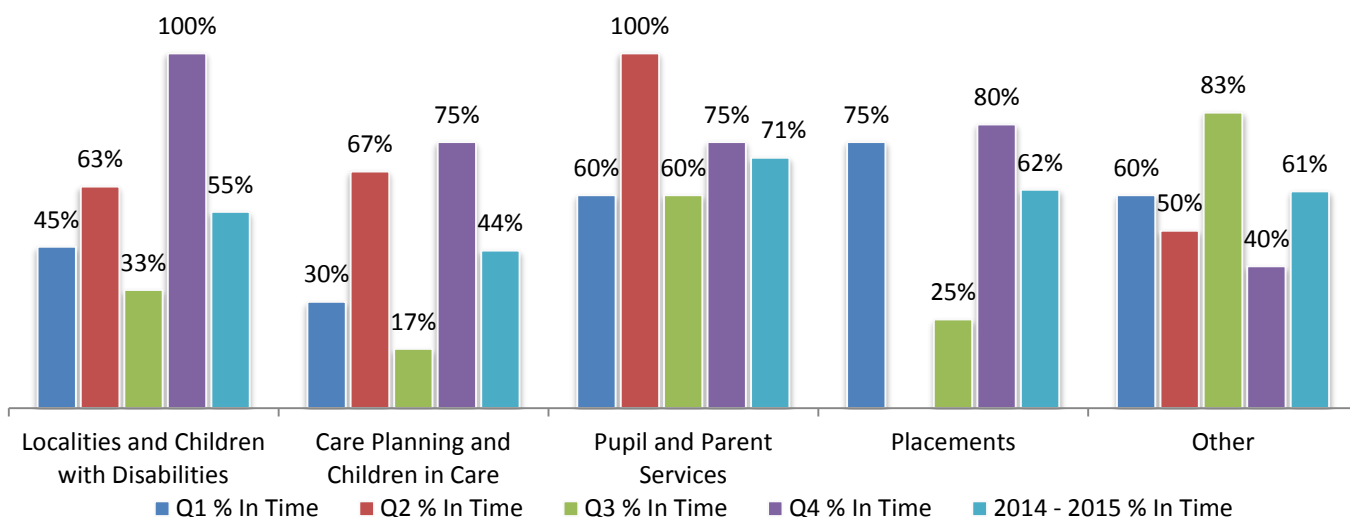
The third Panel concerned a complaint from the parent of a severely disabled young person. Following a review, the care package had been reduced. The parent complained that the review had failed to take account of key information. The original care package was reintroduced following the complaint investigation. The Panel concluded that the family had suffered a considerable amount of stress and anxiety and awarded compensation of £500.

8. Local Government Ombudsman decisions made during the year

Five Ombudsman decisions were received during the year. Three of the decisions involved cases that had **not** been through the Council's complaints procedure. It is worth pointing out that the Ombudsman can decide to investigate a complaint – irrespective of whether the Council has had an opportunity to resolve the issue.

Two complaints related to primary school places that had been offered and subsequently withdrawn at short notice. The complainants were awarded £100 and £250 respectively. One complaint concerned a person's experience while in the care of the local authority some 10 years earlier. The Ombudsman declined to investigate on the basis that the complaint was out of time. One case concerned a young person with autism and learning difficulties. The Ombudsman considered that the Council had failed to provide the young person and the family with adequate support. The final decision concerned a complaint that had been through all three stages of the statutory complaints procedure. The Ombudsman criticised the Council for placing a young person (17 year old) who was seen to be vulnerable, in bed and breakfast accommodation while her homeless application was assessed. The young person was subsequently housed by another borough

9. Percentage of first stage complaints responded to within timescale



The above graph represents response rates broken down by quarter and service area. The column on the far right, represents the overall performance figure for each service. As the graph indicates, there were performance issues for much of the year. Steps were taken by the management team, with the support of the Complaints Manager to address this problem. This included the Operational Director reviewing all open complaints at a weekly meeting with service heads. Quarter 4's performance showed a marked improvement which has been sustained into 2015-16, with 96% of complaints answered on time in quarter 1 of 2015-16.

10. Service improvements arising from complaint investigations

Issues raised through complaints or highlighted through investigations are helping to drive the Council's Service improvements agenda, and are proving to be a useful source of business intelligence. Some examples of improvements that came about as a result of the investigations conducted during the year are set out below.

Improved cultural awareness – An especially detailed stage 2 complaint investigation carried out in the summer of 2014, concerning the way the Department had managed a forced marriage case, resulted in a number of improvements in the way reports of this nature are now handled. This includes having clear guidance for staff to follow, concerning when documents should be translated or interpreters provided. The guidance contributed to an overall improvement in the quality of the service provided and a resulted in no further complaints on this subject being received.

Introduction of an appeals process where a reduction in a care package is proposed - A parent of a severely disabled child, complained that a recent assessment, that had resulted in the care package being reduced, had not been conducted properly and failed to take account of a number of factors. The stage 2 investigation supported this view. The previous package was reinstated, the parents received an apology and compensation. On a wider level, an appeals process was put in place which enables parents and carers to get decisions reviewed without having to resort to the complaints process. Staff have received training in the procedure and awareness of the procedure was raised in team meetings. The extent to which the appeals process has been taken up is currently being reviewed.

Improving the communication process - sending sensitive documents securely – An investigation into whether or not a particularly sensitive document containing personal information about the customer and his family, was lost in the post, resulted in the Department agreeing to produce a written policy covering the topic of when information should be sent by secure post. Guidance was also disseminated through team meetings, and has contributed to the Department improving its approach to data security and management.

Managing risk - An investigation that revealed shortcomings in the arrangements made to transport a group of looked after children to the airport, resulted in a number of improvements being introduced. A comprehensive procedure and supporting guidance was devised and circulated to staff and discussed at team meetings. Since the procedure was introduced, no further complaints of this nature have been received.

Improved information to parents/carers about Child Protection Conferences – A parent complained that they were placed at a disadvantage because of the lack of information available from the Department about the role of Child Protection Conferences and how the conference operates. As a result a new leaflet aimed at parents and carers which explains the process in a clear and straightforward way was produced and is also available via the Council’s website.

Clarifying the circumstances in which foster carers will be reimbursed for costs they incur – Confusion over types of expenses that the Department would agree to reimburse led to a new, clearer policy being developed and circulated to all foster carers. The guidance helped enhance the breadth and quality of information the Department makes available to foster carers and resulted in a reduction in complaints about this subject.

11. Profile of complainants and diversity information

The Department serves a large and diverse population, which is reflected in the profile of those who made complaints. Complainants are not compelled to provide equalities based information and the categories below represent those where a reasonable amount of information was provided.

Complaints from a young person – 27 social care-related complaints were either made by a young person (under 24) or were made on behalf of the young person by an advocate. The majority of these complaints were from people who were currently being looked after or who had been looked after previously. All of the complaints were successfully resolved at stage 1 or were resolved without a formal investigation having to take place. More details of complaints made by young people with the assistance of advocates, is set out in the Complaints Advocacy report which is an appendix to this report.

In terms of gender – 30% of complaints were from males and 70% female. No other classifications were recorded.

Ethnicity of complainants

African	15%
Asian or Asian British Other	10%
Black or Black British Other	11%
Caribbean	21%
Indian	10%
Mixed Other	3%
Mixed White and Asian	2%
Mixed White and Black Caribbean	2%
Other	2%
Pakistani	2%
White British	16%

12. Raising awareness of the complaints process

Two new complaint guides aimed at raising awareness and understanding of the complaints process were launched towards the end of the year. One is specifically focused on young people and explains their right to advocacy support when making the complaint. The guides were distributed to officers across the Department and are sent out with complaint

acknowledgements. Electronic copies are available on the Council's website. A communication strategy is being developed to ensure maximum coverage.

Phillip Mears

Complaints and Freedom of Information Manager

August 2015

Appendix B - Adult Social Care Department Complaints Annual Report 2014-15

Introduction

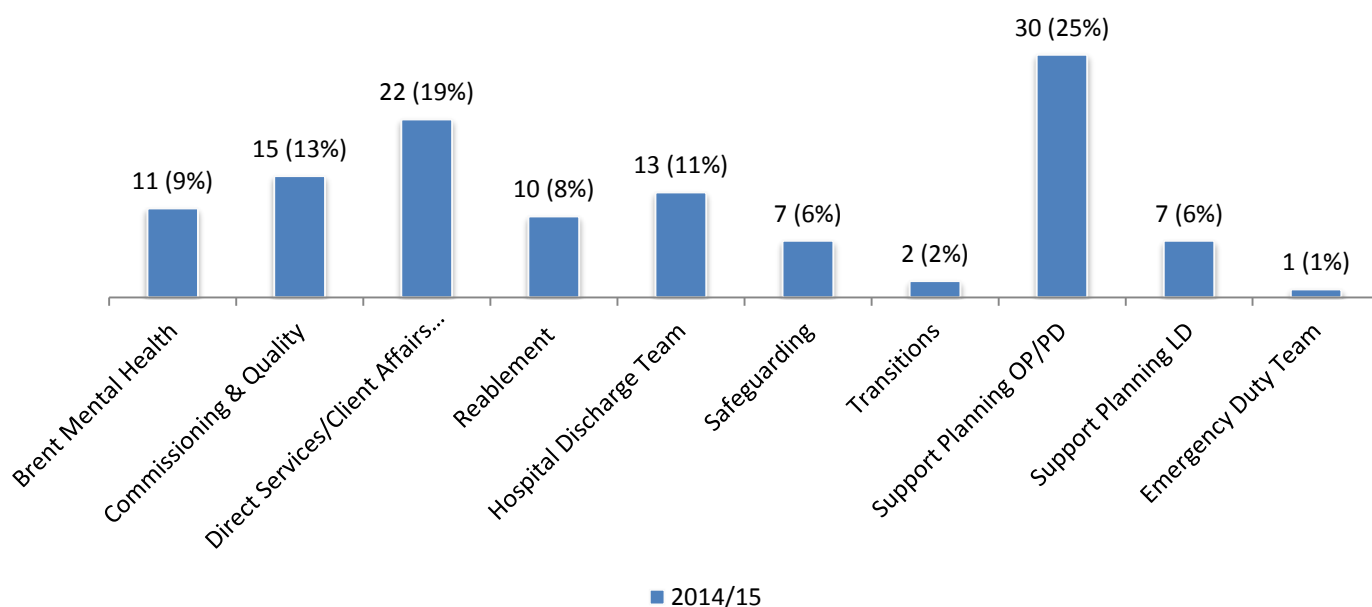
This report provides an overview on complaints made about Adult Social Care in the year April 2014 - March 2015, as required under the Local Authority Social Services and National Health Service Complaints (England) regulations 2009.

Headlines

- One less complaint was received in comparison with 2013/14
- 57% of complaints were answered within the deadline – up by 10%
- A complaints triage system was introduced to identify those issues that could best be managed outside of the complaints process and ensure that only appropriate cases were subject to a full investigation
- The Department benefitted from several key service improvements that were identified through complaint investigations

Complaints Received

The council received 92 statutory and 26 corporate complaints, a total of 118 complaints which is 1 less than 2013/14



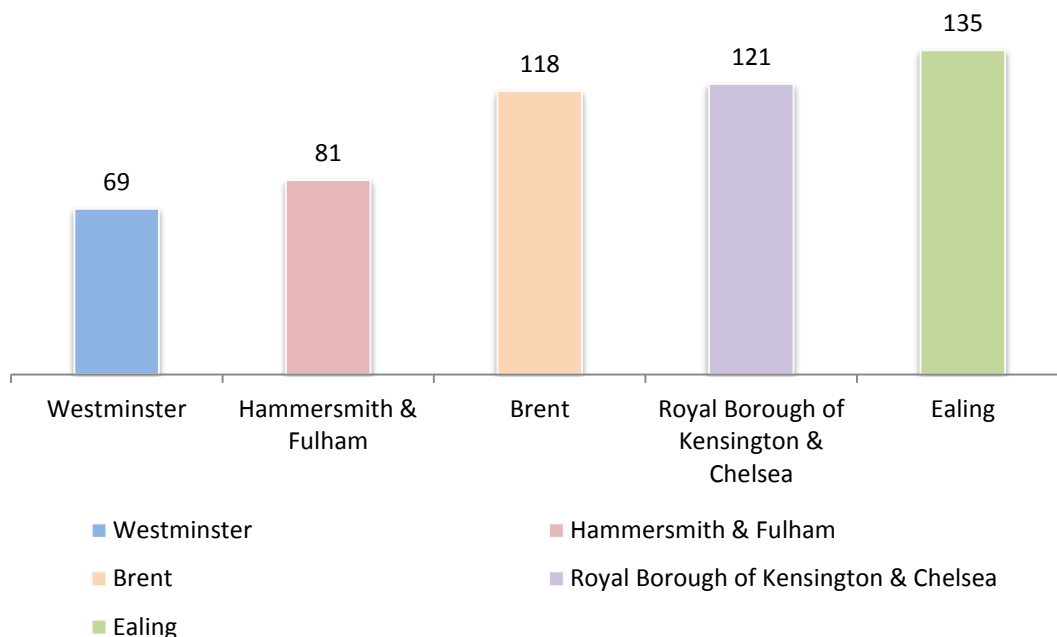
30 complaints related to Support Planning Older / Disabled Persons services. The team manage and assess the more complex care cases, and have to manage the expectations of the families and the service user concerned. Complaints can arise over disagreement with care plans, reduction in packages etc. The team is also responsible for all care reviews carried out for Adult Social Care and complaints can arise when the assessed need changes and alterations to care plans (reduction in care package) result.

The Client Affairs team received 22 complaints 19% of the Department's total. Typically, the issues raised in complaints concerned, the management of funds on behalf of clients, (deputyship / appointeeship), financial assessments and invoicing/billing. Other services, where complaints are in double figures is Commissioning & Quality service, which deal with complaints concerning our

homecare providers, and the Hospital Discharge service whose role is to ensure that coordinated services between the NHS and the Council are in place when a service user is discharged from hospital.

Complaints received in comparison with other boroughs

Brent is part of the West London Complaints Group and we are presently benchmarking our complaints with other local authorities in Central and West London. The graph below, gives an indication of Brent's position in terms of complaints received in comparison with other boroughs.



Underlying reasons for Complaints

Customers make complaints for many reasons and for the purpose of analysis, we seek to categorise these reasons under a number of headings. These include poor communication, delay in or failure to provide a service, incorrect action taken and staff attitude. Majority of the complaints received in the year, fell into the category, of delay or failure to provide a service, followed by incorrect action taken by the council.

Delay or Failure to provide a service	Failure to Act	Failure to Communicate	Incorrect Action taken by the council	Staff Attitude	Other
55 (46%)	6 (5%)	5 (4%)	36 (31%)	5 (4%)	11 (10%)

Delay in providing a Service - Reablement received a number of complaints concerning the delays, in carrying out Occupational Therapists (OT) assessments. This was due to a shortage of OT's and although applications were prioritised once they were received, service users were not informed of the reasons for the delay or when they could expect the assessment to be carried out. This was highlighted by the complaint service team in a report to the ASC management team in January 2015 and has been referred to the ASC transformation team for further consideration.

Poor communication / Staff attitude – Client Affairs Team have received a number of complaints from service users who have received financial assessments and invoices and have not been able to contact the team or responded to voice mail messages.

Incorrect action taken – A client complained that the care worker had incorrectly assessed their care needs and had reduced the number of hours of support that they should receive.

Failure to act – A complainant stated that we had failed to act on information from the hospital when they were discharged and had not placed them in a residential home and that services were not being co-ordinated.

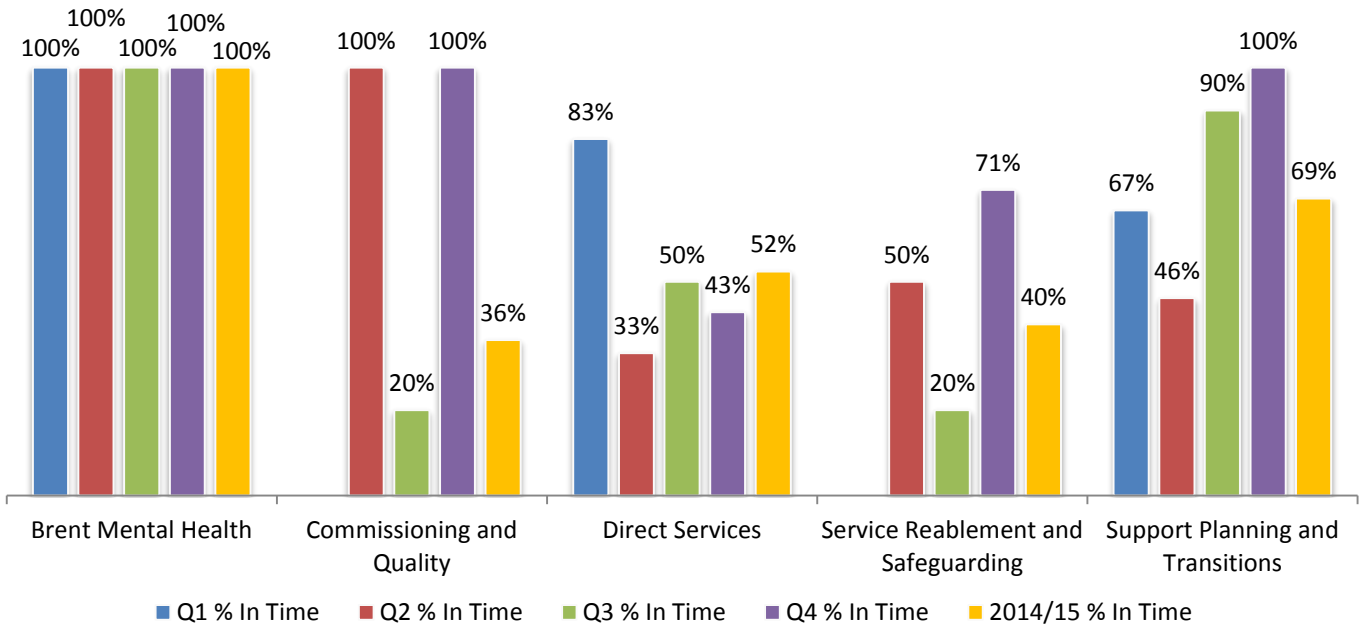
Complaint Performance

Adult Social Care responded to 57% of complaints within the deadline, although an improvement of 10% on the previous year, it was far short of the Council's expectation that all complaints are answered on time.

The graph below represents response rates broken down by quarter and service area. The column on the far right represents the overall performance figure for each service area.

As the graph indicates, there were performance issues for much of the year, although Brent Mental Health Service has consistently achieved the deadline and the performance of the Support Planning & Transitions team have improved in the second half of the year.

Considerable work and support was given to ASC by the complaint service team during the year. Managers were trained on the monitoring both performance and outs on Icasework, which allows them, to effectively manage their complaints. The principal complaint officer has regular meetings with the Strategic Director ASC, attending Management Meetings on a quarterly basis and providing weekly reminders chase ups to managers. This improvement has continued into the current financial year and we are continuing to provide support to ensure the deadline of 100% is reached.



Complaints that were subject to further consideration

The Adult Social Care statutory complaints procedure is a one-stage process. In the event that they remain dissatisfied with the initial complaint response, complainants can ask for their remaining concerns to be considered by the Strategic Director ASC. 10 such review requests were received in the year.

4 concerned the Client Affairs Team 1 Reablement & Safeguarding and 5 Support Planning & Transitions. Upon further investigation, fault was found in 9 of the earlier investigations, which resulted in the original decision being overturned and the complaint being subsequently upheld.

This highlights concerns regarding the calibre of the investigations and responses. The complaint service team have offered targeted assisted / training. The Principal Complaint Officer is working with the management team to improve responses

Local Government Ombudsman Complaints and decisions made during the year

The LGO upheld five cases against the council. In two cases, the ombudsman agreed with the remedy that ASC had offered. I have summarised the remaining decisions below:-

Case A – This referred to a mother and son who complained about the same issue, and which the Ombudsman recorded as two separate complaints. The complaint concerned the son's care needs assessment in 2012. There was a delay in responding to a request for a carer's assessment for the mother. The LGO disagreed with the complaint response and found some minor fault and in both complaints. The council provided an apology and compensation. The complaint highlighted problems in obtaining records from Central North West London NHS Foundation Trust (CNWL), due to records being stored as part of the person's health records. The complaint service team is working with CNWL to improve our responding to enquiries and have asked for access to records to be included in any future section working agreement with CNWL .

Case B - involved a complaint from the son of a service user who stated that the council failed to ensure that his mother received the care she needed and that we had failed to respond to letters from the son. The service user is in need of a care package but will not always accept the care. The son is unable to be in a position to assist his mother and writes numerous letters to the council concerning his mother. Adult Social Care does not retain social workers with clients on a permanent basis and a number of letters had not been responded to. We apologised and have now arranged for the Team Manager to co-ordinate future contact with the son.

Case C - This was a complaint about the way we managed a service users care on their discharge from hospital and how we financially assessed and invoiced them. Fault was found with the discharge from hospital but the Ombudsman agreed with the council's remedy. ASC then made errors in the invoicing of the client and we apologised and paid compensation.

Service Improvements arising from complaint investigations

Issues raised through complaints or highlighted through complaint investigations are driving the Departments Service Improvements agenda and provide useful Business Intelligence. Some examples of improvements that came about because of the investigations conducted during the year are set out below.

- Following comments from the Local Government Ombudsman and the Complaint Service Team, highlighting areas of weakness in how CNWL complete and record a care assessment. Adult Social Care have provided training to all CNWL social care staff on how to record and complete a Care Assessment.
- When a care assessment is completed, a care package commences and a financial assessment will take place a few weeks later. The complaint service team identified that in a number of cases on completion of the financial assessment the service user was not prepared to pay their contribution to the service and the service was then cancelled leaving the service user in debt. A pilot project is starting to complete care assessments and financial assessments at the same time.

- Following a review of a provisional complaint response, the client affairs team and the support planning team provided conflicting information to a client concerning the reasons why their direct payments had been suspended. Improved liaison arrangements between the two services were developed as a result of the issues highlighted in the complaint.
- ASC has received a number of complaints concerning the performance of a supported housing provider. The complaints were fed into the commissioning process and helped to highlight some systemic problems in the suppliers approach to the delivery of the service. Analysis from complaints received contributed to a decision being taken to terminate the contract and a new supported housing provider being appointed.
- Tailoring service to reduce the risk of the customer injuring themselves – a complaint from a customer who raised concerns about having injured their back as a result of moving furniture around to accommodate a number of aids and adaptations, resulted in the department agreeing to explore the prospect of the contractor providing this service as part of the overall package.
- Improved monitoring arrangements in respect of contractors – Complaints about the persistent lateness of care staff undertaking home visits resulted in an urgent contract monitoring meeting being called. Improved monitoring systems were subsequently put in place to ensure targets for promptness of visits.
- Staff training following incorrect information being provided – The customer complained that they had been provided with the wrong information when they first enquired about arranging a carers assessment. This resulted in unnecessary delays. Training was arranged for the staff in question in order to improve levels of understanding and prevent a recurrence.

Diversity Information

Insufficient information was collected to allow for any useful analysis to be carried out. An action plan will be developed involving the Equalities Team, the Complaints lead for ASC and the ASC's management team to identify the options for addressing this shortfall.

Phillip Mears
Complaints and Freedom of Information Manager

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Scrutiny Committee 8th October 2015

Report from the Chief Operating Officer Department

For Information

(Revised) Scope for Scrutiny Task Group on Fly Tipping in Brent

1.0 Summary

- 1.1 This report sets out the proposed scope for the Scrutiny task group on Fly Tipping in Brent. This task group has been requested by the Scrutiny Members in response to communicated concerns from Brent residents'.
- 1.2 The purpose of the task group will be to focus on analysing five key areas:
1. Knowledge
 - Behavioural and sociological research /information from other authorities on successful strategies
 - Brent fly tipping levels, why we have the levels we do?
 - Increasing trends and possible links to the introduction of charging for the green bin (has this increased dumping of garden waste?)
 2. Education
 - Public communication
 - Education (at schools and through community / cultural groups)
 3. Enforcement
 - Current systems (to what extent is this proving effective?)
 - Success of enforcements
 - Deterrents (e.g. CCTV)
 - Trade waste and dumping
 - Landlord dumping
 4. Impact
 - Impact of new 'Green Bin Tax'
 - Impact of Landlord Licensing in reducing the issue
 5. Publicity
 - Success / failure of previous and current publicity campaigns
 - Analysis of how much public awareness there is
- 1.3 The task group will review the local policies and processes of the council and its partners, national research and guidelines and the views and opinions from local residents groups and businesses. The task group will also consult with experts in this field and other London

boroughs which have been identified as being innovative and leaders in reducing fly tipping. The task group will review a number of concerns in regards to fly tipping; which we will seek to look at in the context of Brent, these are:

- The estimated costs every year to investigate and clear up. This cost falls on taxpayers and private landowners.
- Fly-tipping poses a threat to humans and wildlife, damages our environment, and spoils our enjoyment of our towns and countryside.
- Fly-tipping undermines legitimate waste businesses where illegal operators undercut those operating within the law. At the same time, the reputation of legal operators is undermined by rogue traders.
- As with other things that affect local environment quality, areas subject to repeated fly-tipping may suffer declining property prices and local businesses may suffer as people stay away.
- Fly-tipping harms Brent's image as an attractive place to live and work. Brent was recently ranked 3rd in a national survey of the worst boroughs in which to live.

1.4 Making sure that Brent is an attractive place to live, with a pleasant environment, clean streets; well-cared for parks and green spaces is an objective within the Council's Borough Plan. Ensuring that fly tipping is reduced and in the long term eradicated is a widely backed element within the context of our "Better Place" priorities.

2.0 Recommendations

2.1 Members of the Scrutiny Committee are recommended to agree the scope, terms of reference and time scale for the task group on fly tipping in Brent, attached as Appendix A and B.

3.0 Detail

3.1 With member consensus on keeping our borough clean and reducing fly tipping, Members of the Scrutiny Committee requested a time-limited task group undertake a focused piece of work on potential actions to change behaviours through education and reduce fly tipping in Brent. The proposed scope and terms of reference for this work is attached as Appendix A and B.

Contact officers:

Cathy Tyson,
Head of Policy and Scrutiny

Peter Gadsdon
Operational Director Strategic Commissioning

Appendix A

Fly Tipping Proposed scope for Scrutiny Task Group August 2015

Task Group Chair: Cllr Sam Stopp

Task Group Members: Colin George, Chirag Gir, Cllr Bernard Collier, Cllr Krupa Sheth, Cllr Aisha Eniola and Cllr Amer Agha

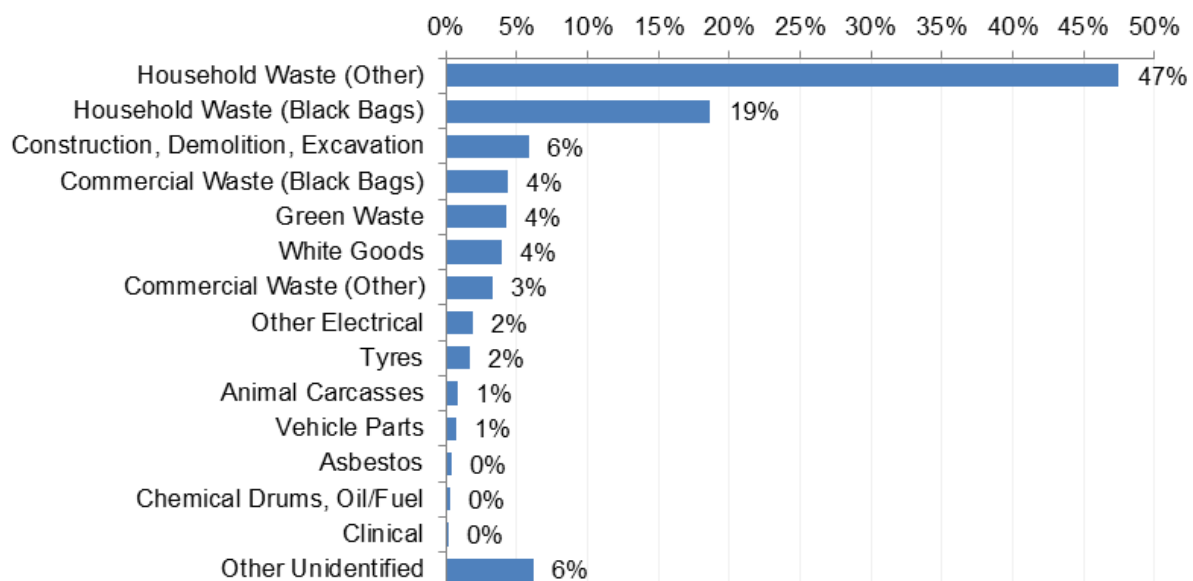
Time frame: Provide report to the Scrutiny Committee meeting on Thursday 5th November 2015

1. What are we looking at?

Fly tipping is the illegal deposit of waste on land contrary to Section 33(1)(a) of the Environmental Protection Act 1990. The types of waste fly tipped range from 'black bag' waste to large deposits of materials such as industrial waste, tyres, construction material and liquid waste. Fly tipping is a significant blight on local environments; a source of pollution; a potential danger to public health and hazard to wildlife. It also undermines legitimate waste businesses where unscrupulous operators undercut those operating within the law.

Local authorities and the Environment Agency (EA) both have a responsibility in respect of illegally deposited waste. Local Authorities have a duty to clear fly-tipping from public land in their areas and consequently they deal with most cases of fly-tipping on public land, investigating these and carrying out a range of enforcement actions. The Environment Agency investigates and enforces against the larger, more serious and organised illegal waste crimes. Both Local Authorities and the Environment Agency are required to collect data on their activity and report this to the Fly Capture database. Responsibility for dealing with fly-tipping on private land rests with private landowners and is not subject to mandatory data reporting.

Types of fly-tipping incidents in England, 2013/14 as proportion of total incidents



Footnotes

Other household waste could include material from house or shed clearances, old furniture, carpets and the waste from small scale DIY works.

Other commercial waste could include pallets, cardboard boxes, plastics, foam, and any other waste not contained in bags or containers and not due to be collected.

2. Why are we looking at this area?

There is significant public concern in Brent about a perceived increase in illegal dumping over the last few years. It is suggested in some quarters that cuts to Brent's budget, handed down by central government, have adversely affected our ability to keep the streets clean. What's more, it is possible that the apparent increase in fly-tipping is a symptom of declining community spirit and cohesion.

Uncontrolled waste disposal can be hazardous to the public, especially when the waste consists of drums of toxic material, asbestos sheeting, syringes or used drugs. There could be a high risk of damage to watercourses and underlying soil quality from the dumped waste. Fly-tipping looks unsightly and this can harm investment in an area. Cleaning up fly-tipping costs taxpayers' money.

According to the Department for Environment, Food and Rural Affairs Fly Capture Database, the most common types of fly-tipped waste are (starting with the greatest quantity): general household waste; white goods (fridges, freezers and washing machines); construction rubbish (demolition and home improvement rubbish); garden rubbish; and rubbish from businesses.

Local Context

Fly tipping is not a just a Brent problem, it is a problem experienced by all areas of the county, urban or rural. As part of the task groups work it will investigate what types of rubbish is being fly-tipped i.e. is it household waste that people cannot fit into their domestic waste collection service, garden waste due to the green bin charge, trade waste from local businesses or builders debris. The task group will also consider possible dumping by landlords – i.e. the dumping of mattresses and old furniture.

Fly-tipping incidents reported by local authorities in 2013-14		
LA_Name	Total Incidents	Total Incidents Clearance Cost
Newham LB ^(a)	67930	£3,026,234.00
Enfield LB	31692	£1,348,880.00
Haringey LB	31045	£1,491,507.00
Southwark LB	26638	£1,108,692.00
Westminster City Council	17121	£699,653.00
Hounslow LB	15864	£564,135.00
Croydon LB	15113	£1,366,642.00
Greenwich LB	12765	£715,829.00
Camden LB	10950	£229,852.00
Lewisham LB	9152	£293,672.00
Hammersmith and Fulham LB	9011	£529,042.00
Redbridge LB	8939	£390,390.00
Harrow LB	8429	£740,504.00
Hackney LB	7635	£1,210,485.00
Brent LB	7001	£425,399.00
Chelsea	6934	£273,482.00
Ealing LB	5765	£243,201.45
Tower Hamlets LB	5201	£241,176.00
Waltham Forest LB	4723	£184,419.00
Havering LB	3620	£157,650.00
Merton LB	3064	£172,574.00
Richmond upon Thames LB	2871	£61,393.00
Bromley LB	2809	£190,587.93
Islington LB	2634	£101,706.00
Hillingdon LB	1995	£90,405.00
Barnet LB	1779	£51,836.00
Barking and Dagenham LB	1282	£119,278.00
Sutton LB	1264	£89,049.00
Lambeth LB	1206	£98,523.00
Wandsworth LB	1105	£78,083.00
Bexley LB	1078	£45,111.00
London Corporation	530	£15,331.00
Kingston-upon-Thames LB	339	£14,466.00

It is worth noting that the methods used to capture and record data by local authorities are not

consistent and why there is a vast difference in the figures above.

High incident areas within Brent:

- Harlesden
- Mapesbury
- Willesden Green
- Kensal Green
- Queens Park
- Wembley Central

Brent Waste Enforcement

Brent urges residents to take an active role and responsibility in keeping their communities clean. Brent encourages residents to be alert and forward on any evidence of fly-tipping to the council. The Cleaner Brent app makes it easy to report litter, fly-tipping, and other problems in streets, parks and cemeteries to us using your smartphone.

The app allows residents to provide information such as:

- registration of vehicle
- time of incident
- location and description of waste
- description of people dumping the waste
- Pictures, if possible, but strongly warns against confront suspects.

Brent will then arrange for it to be removed and trace the origin of the waste to identify who fly-tipped it and when the waste was dumped. Legal action will then be taken when the offender is identified. It is essential that any evidence passed on to Brent is treated as highly confidential and protected from entering the public domain and witnesses who provide it must be seen to be neutral and unbiased.

A review of the overall reporting system will need to be undertaken. There appears to be a public perception that, regardless of any incremental improvements delivered by the Cleaner Brent app, it takes too long for the enforcement team to respond to complaints. It is also suggested that enforcements are not actively followed up.

How enforcement links in with the new Landlord Licensing scheme must also be assessed, as it is hoped that this will be a key part of reducing the issue of fly-tipping in the most overcrowded parts of the borough.

Whilst Cllr Kelcher's own review will look at the effectiveness of CCTV provision in Brent, it would be worth touching upon this also in relation to fly-tipping. Is CCTV an effective deterrent?

National Context

Local Authorities dealt with a total of 852 thousand incidents of fly-tipping in 2013/14, an increase of 20 per cent since 2012/13 with nearly two thirds of fly-tips involving household

waste.

This increase follows more recent year on year declines in the number of incidents. A number of local authorities have reported an increase in the number of fly-tipping incidents. Some local authorities have introduced new technologies; such as on-line reporting and electronic applications as well increased training for staff and have explained this as a factor in the increase in the number of incidents reported.

Local Authorities carried out nearly 500 thousand enforcement actions at an estimated cost of £17.3 million, which was over a £2.0 million increase on the previous year. This equated to an increase of 18 per cent on enforcement actions in the same period.

- The most common place for fly-tipping to occur was on highways, 47 per cent of total incidents in 2013/14.
- Incidents of fly-tipping on footpaths, bridleways and back alleyways increased 15 per cent in England in 2013/14. Together these now account for 29 per cent of fly tipping incidents.
- Approximately a third of all incidents consisted of a small van load of material or less.
- The estimated cost of clearance of fly-tipping to Local Authorities in England in 2013/14 was £45.2 million, a 24 per cent increase on 2012/13.

3. Legislation and Government Policy

Section 33(1)(a) of the Environmental Protection Act 1990; Fly-tipping is rubbish that is illegally dumped on land without permission from landowners or without a licence. It is an arrestable offence with a £50,000 maximum fine or five years imprisonment and any vehicles used in offences can be seized.

What are the main issues?

- It costs an estimated £86m-£186 million every year to investigate and clear up. This cost falls on taxpayers and private landowners.
- Fly-tipping poses a threat to humans and wildlife, damages our environment, and spoils our enjoyment of our towns and countryside.
- Fly-tipping undermines legitimate waste businesses where illegal operators undercut those operating within the law. At the same time, the reputation of legal operators is undermined by rogue traders.
- As with other things that affect local environment quality, areas subject to repeated fly-tipping may suffer declining property prices and local businesses may suffer as people stay away.
- Fly-tipping harms Brent's image as an attractive place to live and work. Brent was recently ranked 3rd in a national survey of the worst boroughs in which to live.

4. What should the review cover?

The review will address the following key areas:

- Knowledge

- Behavioural and sociological research /information from other authorities on successful strategies
 - LB Brent
 - LB Hackney
 - LB Lambeth
 - LB Haringey
- Brent fly tipping levels, why we have the levels we do?
- Increasing trends and possible links to the introduction of charging for the green bin (has this increased dumping of garden waste?)
- Education
 - Public communication
 - Education (at schools and through community / cultural groups)
- Enforcement
 - Current systems (to what extent is this proving effective?)
 - Success of enforcements
 - Deterrents (e.g. CCTV)
 - Trade waste and dumping
 - Landlord dumping
- Impact
 - Impact of new 'Green Bin Tax'
 - Impact of Landlord Licensing in reducing the issue
- Publicity
 - Success / failure of previous and current publicity campaigns
 - Analysis of how much public awareness there is

5. How do we engage with the community and our internal and external partners?

As part of this review the task group will invite relevant partners to get involved; through workshops, discussion groups and one-to-one interviews.

Partners: Group 1

- Relevant Council Departments (Waste Enforcement)
- Brent partners such as the Police and Clinical Commissioning Group (CCG)
- Environment Agency
- Keep Britain Tidy

Partners: Group 2

- Contact Partners & Local Groups:
- Brent & Harrow CCG
- Harlesden Town Team
- Reach Team – Kensal Green
- Willesden Green Town Team
- Harlesden Town Team

- The Cricklewood Town Team
- Alperton Riverside Town Team
- Keep Wembley Tidy

6. What could the review achieve?

The review is expected to deliver a number of outcomes as listed below:

- Better understanding of residents waste disposal behaviour in Brent.
- Clearer understanding of the Council's role and the work it undertakes regarding fly tipping.
- Reduction in the levels of fly tipping in Brent.
- Cleaner and safer environments for all Brent residents
- Reduction in clean-up and enforcement costs
- Opportunities for increase revenue
- More community involvement and stronger residents an council relationships
- Better community spirit and cohesion
- Efficiency savings such as officer time

Appendix B

FLY TIPPING MEMBERS TASK GROUP TERMS OF REFERENCE

A. CONTEXT

Fly tipping is the illegal deposit of waste on land contrary to Section 33(1)(a) of the Environmental Protection Act 1990. The types of waste fly tipped range from 'black bag' waste to large deposits of materials such as industrial waste, tyres, construction material and liquid waste. Fly tipping is a significant blight on local environments; a source of pollution; a potential danger to public health and hazard to wildlife. It also undermines legitimate waste businesses where unscrupulous operators undercut those operating within the law.

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Uncontrolled waste disposal can be hazardous to the public, especially when the waste consists of drums of toxic material, asbestos sheeting, syringes or used drugs. There could be a high risk of damage to watercourses and underlying soil quality from the dumped waste. Fly-tipping looks unsightly and this can harm investment in an area. Cleaning up fly-tipping costs taxpayers' money.

B. PURPOSE OF GROUP

A Council Members' task group chaired by an elected member and coordinated by a council Scrutiny officer was set up in August 2015. Sponsored by the Scrutiny Committee, the aim of task group is to collate, review and evaluate evidence gathered from various sources; which include. Residents, local groups and a number of best practicing local authorities. Evidence will also be sought from guest speakers from a number of related government departments and non government organisations (NGO).

The objectives at the time were:

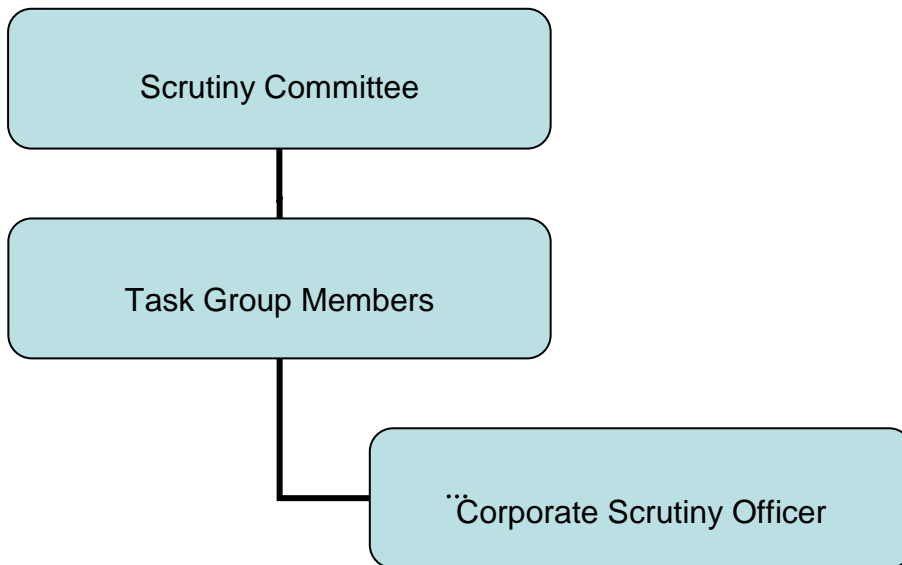
1. Liaise with stakeholders to gather evidence.
2. Use reviewed evidence to inform findings and recommendations for reduced levels of fly tipping in Brent.

C. AIM & OBJECTIVES

Aim of the Task Group is to gather and review evidence; once the evidence is reviewed the task group will produce a paper with their finding and recommendations. Areas that the review will cover:

- **Aims;** The review will address the following key areas:
 - Knowledge
 - Behavioural and sociological research /information from other authorities on successful strategies
 - LB Hackney
 - LB Lambeth
 - LB Haringey
 - Brent fly tipping levels, why we have the levels we do?
 - Increasing trends and possible links to the introduction of charging for the green bin (has this increased dumping of garden waste)
 - Education
 - Public communication
 - Education (at schools and through community / cultural groups)
 - Enforcement
 - Success of enforcements
 - Deterrents
 - Trade waste and dumping
 - Landlord dumping
 - Impact
 - Impact of new 'Green Bin Tax'
 - Impact of Landlord Licensing in reducing the issue
- **Objectives;** The review is expected to deliver a number of outcomes as listed below:
 - Better understanding of residents behaviour in Brent
 - Reduction in the levels of fly tipping in Brent
 - Cleaner and safer environments
 - Reduction in clean-up and enforcement costs
 - Opportunities for increase revenue
 - Better community spirit and cohesion
 - Efficiency savings/Officer time

○ **D. GOVERNANCE & ACCOUNTABILITY**



E. MEMBERSHIP

1. Cllr Sam Stopp (Chair)
2. Cllr Aisha Eniola
3. Cllr Krupa Sheth
4. Cllr Bernard Collier
5. Cllr Amer Agha
6. Colin George
7. Chirag Gir

Kisi Smith-Charlemagne – Scrutiny Officer

Other key stakeholders would be invited as appropriate.

F. QUORUM & FREQUENCY OF MEETINGS

There should be at least 2 members present at each meeting. A minimum would be the Chair, and another member of the task group. The task group will meet twice per month or approximately every two weeks with sub meetings held between the chair and the Scrutiny Officer as required.

G. DATE OF REVIEW

Start: August 2015

End: Scheduled for presentation to the Scrutiny Committee on 5 November 2015

2014-15 Scrutiny Committee Meetings – Key Comments, Recommendations and Actions

Meeting Date	Item	Comments and Recommendation	Action
6 th August 2014	Central Middlesex Hospital Closure Assurance Transforming Healthcare in Brent	That an update be provided on the Central Middlesex Hospital A&E closure assurance at a future meeting of the committee. That a further report updating the committee on the progress made in relation to transforming healthcare in Brent be submitted to a future meeting of the committee.	Clearer understanding of the action plan proposed. Further transparency of plans between the CCG and Brent Council.
	Call In - Changes to Recycling and Green Waste Collections	An outline of the suggested course of action of the Scrutiny Committee is to: <ul style="list-style-type: none"> • Seek a report responding to the concerns outlined. • Question lead member and senior officers and the leader. • If necessary, set up a very brief task finish group to examine these issues in more depth. (i) that the decisions made by the Cabinet on 21 July 2014 regarding changes to recycling and green waste collections be noted; (ii) that a review be held following a period of 9 months; (iii) that efforts should be made to ensure the removal of the green waste bins be as close as possible to 1 March 2015 to minimise inconvenience to residents.	More consideration given to the impact of residents. Ensure that longer consultation is considered for such matters in the future.
	Scope for Promoting Electoral Engagement Task Group	The scope and timeline for the task group on Promoting Electoral Engagement as set out in Appendix A to the report was agreed.	
	Budget Scrutiny Panel - Terms of Reference	The terms of reference for the Budget Scrutiny Panel as set out in Appendix A to the report was agreed.	
9 th September 2014	Closure of A&E at Central Middlesex Hospital	That an update on performance at Northwick Park Hospital Accident and Emergency Department to be provided to the committee in six months time.	Further information on the progress and performance of NPH and A&E services. Holding these services to account on improved performance for residents.
	Parking Services Update	That Cabinet be requested to reappraise the existing arrangements for visitor parking permits, taking into account the serious concerns expressed by the Scrutiny Committee	Equality impact assessments to be reconsidered

	Proposed Scope for Scrutiny Task Group on the Pupil Premium	<p>and members of the public.</p> <p>It was proposed that the task group also examine qualitative data regarding the activities undertaken by schools. He advised that holistic activities which aimed to meet emotional as well as academic needs were also very important for a child's development and attainment. It was emphasised that some enrichment activities did not deliver immediately observable results and that this should be considered when looking at the period of study. It was further suggested that the task group engage with parents and children to discuss their experiences.</p> <p>The scope and time scale for the task group on the use of the Pupil Premium, attached as Appendix A to the report was approved with the condition that the recommendations be incorporated.</p>	Recommendations made were incorporated in the tasks group's scope of work.
1 st October 2014	North West London Hospitals Trust Care Quality Commission inspection compliance action plan	<ul style="list-style-type: none"> • Members asked for further information on plans in respect of major emergencies and emphasised the importance of ensuring key roads were open as is this had been an issue, for example, during the 7 July 2005 London bombing incidents. • Members also asked whether the planned additional beds at NPH had happened and if so how many. The committee sort views with regard to the progress made since the CQC inspection and how confident was the Trust that the action plan would achieve the objectives and within the timescales set. <p>The Chair requested that a report be presented to the committee in about two months' time updating them on progress with the action plan, including whether the measures listed were on target to be achieved within deadlines set. In addition, any members who had questions requiring specific details were to submit these to Cathy Tyson (Head of Policy and Scrutiny, Assistant Chief</p>	

		Executive Service) who coordinate responses from NWLHT.	
	Local Safeguarding Children Board annual report	The Chair stated that a briefing note updating the work of the task group on the Pupil Premium would be provided to members. He emphasised the importance of safeguarding children and welcomed the report.	Gaps in the report which the committee raised have been considered and will be included in the next annual report
	Draft school places strategy	<ul style="list-style-type: none"> • Whilst members appreciated the opportunity the presentation gave for pre-scrutiny prior to a report going to Cabinet, enquired whether officers were confident that primary schools could maintain educational standards as they got larger. • Members also asked whether placing Special Educational Needs (SEN) pupils was relatively trouble free. A question was raised as to whether schools in the north of the borough were taking more pupils than those in the south and where could details be found of pupil numbers throughout the borough. Another member asked whether school expansion posed risks in terms of whether there was sufficient infrastructure in place. <p>The Chair concluded discussion by acknowledging the large interest from members and other councillors on this item and in noting the improvement in placing pupils in the last two years. However, he emphasised the need to sustain progress and requested that school places be considered at a Scrutiny Committee meeting in around two months' time.</p>	
	Children's centres	<ul style="list-style-type: none"> • Member suggested that the children centres were concentrated in a particular area and neglected the north of the borough. Members sought advice on what members should be focusing on in view of the fact that the report had already been approved by Cabinet. • A member sought clarity that the children's centres provided for those children up to and including four years of age. In noting that children were entitled to nursery places between two to three years of age, she sought further reasons for how children's centres were being 	

		<p>used.</p> <ul style="list-style-type: none"> • In respect of the Barham Park building, it was noted that there were proposals for a nursery to be included; however sought clarity on this matter as Barham Park Trust had stipulated that the building was for community use only and the lack of consultation on this proposal had also angered residents. <p>The Chair commented that the long term future of the children's centres would be clearer in around four months time and he requested that an update be provided to the committee at around that time.</p>	
3 rd November 2014	Employment, Skills and Enterprise Strategy consultation	<p>The Chair acknowledged the substantial work that had been undertaken in developing the strategy and the progress made so far. He requested that a progress report on the strategy be presented to the committee in two to three months' time.</p>	
	Overall impact of the Benefit Cap in Brent after one year of implementation	<ul style="list-style-type: none"> • Member asked if any lessons had been learnt since the OBC had been introduced and had there been any surprising developments. • Members also asked if there were any strategic issues that needed consideration in the future. In respect of resource issues, comments were sought about how significant these were and what were the expectations in the medium term. A question was raised as to where customers who moved out of the borough were moving to. • A member asked if the council was able to assist Brent CAB in dealing with the increased demand that they were struggling to cope with and was there any help for single under 35 year olds on Benefits. <p>The Chair explained that this item had been requested shortly before the meeting and this is why a presentation had been given. The importance of continuing to engage with residents about welfare reforms was emphasised and it</p>	

		was requested that the committee receive regular updates on this issue.	
26 th November 2014	Care Quality Commission Quality Compliance and Quality Improvement Action Plan	<ul style="list-style-type: none"> Members sought an update was sought on Delayed Transfers of Care, responding to the committee's queries <p>NWLHT advised that the CQC had commented on the open and frank culture amongst staff.</p> <p>That an update on the progress made in addressing the recommendations of the CQC be presented to a future meeting of the committee.</p>	
	Local Impact resulting from Changes to maternity, neonatal, paediatric and gynaecology services at Ealing Hospital	<p>The committee questioned what contingency plans were in place if it was found that the proposals were not feasible or appropriate. It was questioned whether similar modelling had been undertaken regarding the anticipated dispersal of service pressures for A&E units following the closure of the unit at Central Middlesex Hospital (CMH).</p> <p>That the committee be provided with an update on the implementation of the proposed changes to maternity, neonatal, paediatric and gynaecology services at Ealing Hospital at a future meeting.</p>	
	Developing Central Middlesex Hospital	<ul style="list-style-type: none"> The committee sought further information regarding the provision of in-patient mental health service at the Park Royal site. Queries were raised regarding the consultation activities undertaken, including the number held and how they were advertised. Further details were sought regarding the services available in the North of the borough and the procedures in place to deal with large scale health emergencies. A view was put that consultation on changes to primary care had been poor. Councillor Daly requested that details of the number of beds to be removed across North West London under SaHF be provided to her in writing. <p>(i) That the update report be noted</p>	

		(ii) That further information regarding the proposals for Central Middlesex Hospital be provided to the committee in writing and include a breakdown of the financial implications of the proposals.	
	Promoting Electoral Engagement - Scrutiny Task Group report	That the recommendations of the 'Promoting Electoral Registration' task group as detailed in the report be endorsed.	Since the report was agreed by service areas, the Programme Management Office has been tasked with developing a project to support the implementation of the recommendations. The Project started in January 2015 with an advertising campaign. The team have completed promotional activities and are now focusing on outreach and community engagement activities. Since the beginning of the project voter registration has increased by 2768.
6 th January 2015	Safer Brent Partnership Annual Report 2013 - 2014	The Chair welcomed the SBP report and stressed the need to continue dialogue between the partners in the SBP and the community. He requested that the committee receive an update on the work of the SBP in around six months' time.	Refocus on VAWAG stats, number may be going up, but this is due to more confidence in reporting and better recording of incidents.
	Interim feedback from the Budget Scrutiny Task group	Members suggested that the Investments and Pensions Manager be invited to the next Budget Scrutiny Task Group meeting. The Chair concluded by stating that there was still much work to do before the final task group report and the recommendations it would make.	The Cabinet responded positively to the concerns raised and the debates held by the Budget Panel Task Group of the Scrutiny Committee. . The Budget Panel's report and recommendations were included as part of the Final Budget Report which was agreed by the meeting of Full Council in March 2015.
10 th February 2015	Current Status of Systems Resilience Group and Winter Pressure Update	<ul style="list-style-type: none"> • The committee commented that they had been told at previous meetings that transferring staff from the closed A&E at CMH to NPH would lead to improvements in staffing levels and clarification was sought as to whether this had been demonstrated. • An explanation of the difference between bank and agency staff was requested and members asked what the 	

		<p>ring fenced grant in respect of delayed transfers of care was specifically for and what was the size of the grant.</p> <ul style="list-style-type: none"> • Members added that he had a positive personal experience when he had needed to visit the A and E at NPH around Christmas time and the service he received was efficient. <p>The Chair added that in some reports, the information was provided was not always as clear as it could be and was difficult to explain to residents and he asked that this be taken into account in future reports. He asked that an update on the SRG be provided at a future meeting.</p>	
	Brent Education Commission - six month update on the implementation of the Action Plan	<p>(i) that the contents of the report be noted and that a further update be received in the autumn of 2015;</p> <p>(ii) that the introduction of a proportionate approach to school improvement and the more robust challenge offered to schools at risk of underperforming be welcomed; and</p> <p>(iii) that the local authority's role in progressing a shared approach to supporting schools with its key educational partners, including Brent Schools Partnership and the two Teaching School Alliances be welcomed.</p>	
	Annual report academic year 2013-14: Standards and achievement in Brent schools	<p>The Chair requested that an update on this item be presented to the committee at a meeting in the autumn of 2015.</p> <p>(i) that the priorities proposed for 2014-15 intended to accelerate improvement be noted; and</p> <p>(ii) that the progress made in the overall performance of Brent's primary schools in 2013-14 be welcomed.</p>	
11th March 2015	Update on Customer Access Strategy	<ul style="list-style-type: none"> • Members asked whether the testing would be undertaken borough wide and it was commented that the triage system had worked well to date and asked whether there was training for staff in dealing with particularly complex issues. • Members also asked what would be ideal way in which residents would describe the service they had 	

		<p>experienced as far as the council was concerned.</p> <ul style="list-style-type: none"> • Members sought further information on what service areas had been underperforming and how was misdirecting of calls by the switchboard being monitored or picked up. In terms of calls reported as misdirected, it was asked if this was formally recorded. • Comments were made regarding a danger of making the council too remote from the community by shifting access via IT and telephony channels and removing opportunities for direct contact with residents <p>The Chair requested an update on this item for the December 2015 Scrutiny Committee meeting. That the progress being made in implementing the aims of the new Community Access Strategy be noted</p>	
	Housing pressures in Brent	<ul style="list-style-type: none"> • Member stated that issue of extensions in rear gardens needed to be investigated more. • Another member queried whether information held on landlords was confidential and • Member commented that it was regretful that the large housing stock the council had in the 1980s had been eroded by selling a significant proportion to housing associations at lower cost over the past few decades. It was added that he felt that the council's Pension Fund should invest more in housing. <p>The Chair requested an update on this item in six months' time, including details of the number of people who were leaving the borough. That the report on housing pressures in Brent be noted.</p>	
	Unemployment and Work Programme providers	The Chair emphasised the importance of the non disclosure agreement being reached between the Work Programme providers and the council. He added that it would be useful	The issue of cooperation with work programme providers has been highlighted and a greater urgency to

		<p>if there could be more information on how the council could assist Work Programme providers and their clients and that there needed to be a more joined up approach. He requested that the committee receive updates on unemployment levels and Work Programme providers on a quarterly basis.</p> <p>That the report on unemployment levels in Brent and the Work Programme be noted.</p>	<p>resolve some of the minor partnership issue is now at the forefront to the committee's agenda. Non disclosure agreements are being completed.</p>
30th April 2015	Environmental Sustainability Agenda	<ul style="list-style-type: none"> • In the subsequent discussion, the committee queried the ways in which the council could effect behavioural change regarding waste and recycling amongst residents and businesses. • The committee also questioned how retailers could be encouraged to reduce packaging and the financial benefit for the council of improved recycling rates. • Members sought further details regarding relationships with partner agencies, such as TFL and Northwest London Hospitals Trust. With regard to the former, it was queried what work had been done to identify pollution hotspots in the borough, whether there was any correlation with bus routes and how active reporting could be encouraged when buses were left running whilst parked. • The committee raised several queries regarding air pollutants and the use of diesel fuel, seeking information on when TFL would be introducing non-diesel buses, how the council would encourage the use of non-diesel private and commercial vehicles, how traffic flow could be improved across the borough and the number of charging points provided in Brent for electric vehicles. • Further information was sought regarding the work done with property developers across the borough, in recognition of the challenges for the existing infrastructure of increased road users. • Officers were also asked to comment on whether consideration had been given to seeking an extension of 	<p>Highlight to the committee the work undertaken across key service areas to address the issue of sustainability. Focusing on five key areas: transport and travel; air quality; in-house carbon management; street lighting and parking; public realm and waste; and parks and biodiversity.</p>

		<p>the Mayor of London's bike hire scheme.</p> <ul style="list-style-type: none"> • Members requested details of the number of staff responsible for addressing issues of sustainability and whether these were sufficient to support progress in this area. <p>That an update on the Environmental Sustainability Agenda be to the committee in six months time.</p>	
	Future Commissioning intentions of Brent Clinical Commissioning	<ul style="list-style-type: none"> • Members questioned the quality of engagement with community groups, emphasised the failure to meet national performance standards in the previous year, questioned what was being done differently to address these issues and sought specific timescales for achieving improvements. • Members queried what action was being taken to raise awareness of dementia amongst different communities, including the provision of materials in a variety of languages. • Members sought clarity regarding Brent CCG spending for 2014/15, noting that having accounted for commissioning for acute and community care there remained approximately a further £80m unaccounted for. • Members further queried the 2014/15 spending on enhanced GP services and the work undertaken to evaluate their success. <p>That an update be provided to a future meeting of the committee</p>	
	Use of Pupil Premium Grant Scrutiny Task group	<p>(i) that the recommendations of the task group be endorsed (ii) that subject to Cabinet agreement of the recs, an update on the implementation of the task group's recommendations be provided to a future meeting of the Scrutiny Committee</p> <p>The recommendations of the Pupil Premium Task Group be endorsed, subject to Cabinet approval. The committee</p>	<p>To date, the work done by the task group has raised the profile of the Pupil Premium. It has also encouraged further partnership working by the council, schools, Children Centres, parents, children and all educational providers. The task group has opened up the</p>

		receive an update on the implementation of the Task Group's recommendations at a future meeting of the committee.	discussions for innovative use of the PPG in Brent.
	Scrutiny Annual Report 2014/15	Committee members were invited to submit feedback on the draft report which would be finalised for the end of May 2015. The draft Annual Scrutiny Report 2014/15 was noted.	The Annual report highlights the work that the scrutiny committee has undertaken this year. Focussing on the part that the committee has played in key council decisions which have lead to improved outcomes and services for residents.
	Equalities and HR Policies and Practices Review and draft Action Plan	<ul style="list-style-type: none"> • Concerns were raised regarding the number of staff failing to receive supervisory appraisals, the implications this had for staff progression and whether managers were using the appraisals as an effective tool to support staff. • Clarity was sought on the policy for medical appointments and assurance was requested that this was not considered a reasonable adjustment for disabled employees. • The issue of unconscious bias was raised and it was strongly suggested that this form a core element of any training provided around recruitment. • Further details were requested regarding the training and support provided to members appointed to the Senior Staff Appointments Sub Committee. • With regard to BME representation at senior management, members queried how the council compared to other boroughs and whether there was an opportunity to learn from the practices of other local authorities. <p>The Chair highlighted the importance of ensuring that there was robust monitoring of the action plan and the committee agreed that an update should be provided on the progress achieved in six month's time.</p>	
16th June 2015	Paediatric Services - CCG	<ul style="list-style-type: none"> • Members requested a copy of the data modelling which was used by Shaping a Healthier Future to assure the CCG of the projections of demand to underpin the case for 	Joint report produced on behalf of Brent Clinical Commissioning Group (CCG) and London North West Healthcare NHS Trust

		<p>transfers of services from Ealing to Northwick Park and the future bed capacity required in the paediatric services at NWP. They also requested the data that will be used to inform reassurance decisions next March.</p> <ul style="list-style-type: none"> • Members request that the Accountable Officer – CCG, provide further details of the financial costs set out in the table at para 2.2 regarding how the same level of paediatric service would be achieved within reduced costs. <p>The committee requested that they receive a further update from the CCG on the information used to reach assurance on the safe and smooth transfer of services at their meeting in February 2016. CCG /NWLHT agreed to this request.</p>	<p>(LNWHT). Provide insight into the Paediatric Services and current provision provided to Brent residents. Highlight the potential impact on Northwick Park Hospital with regards to the impending changes to paediatric services at Ealing Hospital taking place on 30 June 2016.</p>
	<p>Access to GP services Interim Task Group Report</p>	<p>The committee requested that the final report on the access to GP services should include further information on:-</p> <ul style="list-style-type: none"> • Details of the location of GP hubs, public awareness of the GP hub mechanism and any evidence of the public's confidence in their GP. • How the future publicity campaign for GP hubs will be delivered. • Members requested information on how many GP's were sited in single GP practices or in practices with more than one GP. The also requested information on the numbers of GP's who are approaching retirement age. • Information was requested on how many GP practices were experiencing difficulties in recruit trained staff and if this was related to housing costs. Any information on how GP's are addressing recruitment problems. • Information on the numbers of people registered with a GP, number of people not registered and those who may still be registered with a GP in Brent but have moved away. <p>Members requested that the additional information</p>	<p>Interim feedback on the work of the Scrutiny Task Group focused on Access to Extended GP Services and Primary Care in Brent. Provided an outline of the task group scope, methodology and an overview of emerging findings and recommendations.</p>

		requested is included within the final report of the task group on GP services which will be considered at the July meeting of the Committee.	
Brent Public Health Update	<ul style="list-style-type: none"> • Members requests that the financial return for Public Health expenditure made to the Department of Health is also circulated to scrutiny. • Members asked for a detailed breakdown of the numbers of people offered and accepting a health check update by GP practice • It was requested that a breakdown of the drugs and alcohol budget with numbers of patients in treatment by type of treatment is provided to the committee. This should include the indicative figures for the range of spend per patient for different types of treatment packages. • The number of people who have been helped to stop smoking by GP practice. • There was also a request for some future work to be undertaken on the school nurse service. This has only recently come under the councils contracting responsibilities and further work is being undertaken on the future contractual priorities. <p>Members commented that the report while outlining the expenditure and priorities for improving public health did not provide a picture of the impact made in tackling health inequalities. Would like further information on the actual change in prevalence of preventable health conditions.</p>	Highlight new local authority Public Health responsibilities and how the Council is discharging this responsibility as a result of the Health and Social Care Act 2012.	
Access to affordable childcare	<ul style="list-style-type: none"> • Members requested further information on the use of discretionary housing payments to support childcare costs for people moving into employment who have been affected by changes in welfare benefit payments. • It was asked if any work has been undertaken to assess the impact of support given to parents to access employment. 	Focused look at the challenge of providing access to affordable and quality Childcare.	

		Members asked to receive an update on the implementation of the overall Child Poverty strategy in 2016.	
14th July 2015	Brent Housing Partnership - Performance	<ul style="list-style-type: none"> • Questions were asked on the cost of BHP modernising its computer systems, income from leaseholder charges and details of where the charges had been defended against legal action. • Members of the committee questioned the delays in job completions. • Members also asked how cases of anti social behaviour and illegal sub-letting were handled. • Members requested further information from BHP on Void times, complaints, communication with residents, seeking possession and illegal sub-letting. 	An overview of BHP 2014/15 performance, providing a demonstration of how it works to deliver objectives set out by the council.
	Developing Scrutiny Work Programme 2015/16	<p>It was confirmed that the Budget scrutiny panel would be reconvened to consider the budget for 2016/17.</p> <ul style="list-style-type: none"> • The committee asked that a briefing paper be provided on how the protection of pubs had been incorporated into the Development Management Plan. • That a briefing paper be provided on the admissions policies adopted by different types of schools. • That the chair, education co-opted members and a senior officer from the Children and Young People's department meet to discuss the education related topics. <p>(i) That the arrangements and principles for the effective operation of the Scrutiny Committee, as set out in paragraphs 3.1 – 3.6 of the report submitted, be noted;</p> <p>(ii) That the proposed process for defining the annual work programme for scrutiny detailed at paragraphs 3.10-3.14.</p>	Arrangements of the future operation of the Scrutiny Committee and the process for developing a robust work programme.
12th August 2015	The Councils future Transport Strategy	The Committee expressed concern that the strategy was too brief and lacked ambition. Members felt that it lacked evidence in places whilst making certain assertions and was rooted in the possibilities as they related to Transport for	An opportunity for the Scrutiny Committee to review and comment on the councils draft Long Term Transport Strategy (LTTS) before it is submitted to Cabinet.

		<p>London (TfL) and the availability of funding rather than going beyond this into areas where the Council needed to send out strong messages and councillors needed to lobby to address some of the major transport concerns in the borough.</p> <ul style="list-style-type: none"> • Scrutiny Committee recommends that Cabinet defer taking a decision on approving the Long Term Transport Strategy for Brent so that fuller consideration can be given to the points raised on it by the Committee; • Scrutiny Committee requests that Cabinet note the comments made by the Committee and agrees to the recommendations below being more fully addressed in the finally agreed strategy: <ul style="list-style-type: none"> i. The strategy needs to be more ambitious and incorporate reference to schemes on which the Council might need to lobby in order to see them progress. ii. The strategy should not be restricted to only those schemes and improvements that might be supported by TfL and included in LIP submissions, especially bearing in mind the forthcoming London Mayoral Election when a new Mayor will be elected who might have different priorities. There is a need for the serious public transport issues and road usage problems to be addressed. iii. Reference should be included of the Dudden Hill rail line and it's potential. iv. The possibility of a conflict of approach with neighbouring boroughs and the need to develop shared visions with other boroughs on those transport issues at the borough boundary should be articulated. v. Greater focus should be given on equality of access from the different geographical areas of the borough (North/South – East/West). 	<p>The LTTS has been developed to provide strategic direction to the transport investment throughout the borough over the next 20 years (2015-2035)</p>
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	Food Standards Audit	<ul style="list-style-type: none"> Members of the committee questioned Officers and the lead member on structure and staffing of the team. Members made inquire about the numbers and the profile of Brent businesses, with emphases on the risk categories. Members were keen to know what penalties the council could face if improvements are not made. Members wanted to know how the budget for the services was currently being spent and how this related to the improvements required. One Member questioned how the present situation impacted on the health of local residents. <p>The findings of the Food Standards audit carried out in July 2014, the issues arising, response to date and the planned actions were noted.</p>	A detailed look into the July 2014 Food Standards Authority audit of the Councils discharge of its Food Safety Act 1990 duties. The report further highlighted the audit reports findings and the Councils responses including the action plan the Council is using to monitor progress.
9th September 2015	Central and North West London NHS Foundation Trust - Care Quality Commission report and action plan	<ul style="list-style-type: none"> Members were most concerned with the mental health services ad questioned the savings and cuts made by CNWL and where these cuts had been made. Members were concerned with the number of patients absconding from units and asked for further clarification on patients who were subject to section 17. 	The published Care Quality Commission (CQC) report on the quality of services provided by Central North West London NHS Foundation Trust and an action plan has been developed by the Trust to respond to the findings of the inspection.

		<ul style="list-style-type: none"> • Members questioned how long children were waiting for CAMHS appointments from referrals and how referrals were made for children with Attention Deficit Hyperactivity Disorder (ADHD). • Questions were asked about the numbers of restraining incidents, how many took place at Park Royal which was of particular concern and how many were recorded as being supine restraint. Reference was also made to the use of rapid tranquilisation restraint. <p>The committee requested a progress report in 6 months and a separate report in 3 months on the redesign of services in light of saving cuts.</p>	
	<p>Scrutiny task group on Access to extended GP services and primary care in Brent</p>	<ul style="list-style-type: none"> • Task group members explained that they had not been able to look into the optimum size for a practice but it was clear that there was a range of varied opening hours and gaps in service during lunch hours and Wednesday and Thursday afternoons. • It was the decision of the GP on hours of service and the task group had not been able to obtain full information on what out of hour's service there was. Members expressed surprise that communication plans were not integral to the delivery of services. • It was the understanding of the task group members that the CCG would consider the recommendations of the task group and make a formal response. The task group would meet again in six months time to consider the response of the CCG and progress with implementation of their recommendations. <p>That the recommendations made by the task group be approved and an action plan developed across partner organisations to take them forward;</p> <p>That a progress report on implementation of the</p>	<p>The committee received the report of the task group that had been established to review the primary care element of Brent CCG's transformation programme and assess the extent of the changes and investment made in the Brent GP networks and primary care services.</p>

		recommendations be submitted to the committee in six months time.	
	Terms of reference for task groups on Fly Tipping and CCTV	<p>That the scope, terms of reference and timescale for the task group on CCTV in Brent, as set out in the appendices attached to the report submitted, be agreed.</p> <p>That the scope, terms of reference and timescale for the task group on fly tipping in Brent, as set out in the appendices attached to the report submitted, be agreed.</p>	The reports set out the proposed scope for the Scrutiny task group on Fly Tipping in Brent on Close Circuit Television (CCTV) in Brent
	Scrutiny forward plan and key comments, recommendations and actions	<p>The Chair circulated a proposal for a task group on school governance and invited members of the committee to suggest issues to be included in its scope.</p> <p>The Chair suggested the following further items to be subject to scrutiny:</p> <ul style="list-style-type: none"> • school admission policy • children and young people mental health • adoption • the Council's budget setting (to be the work of a task group) • housing associations • section 106 and CIL <p>That the scrutiny forward plan and the key comments, recommendations and actions be noted.</p>	