



## Cabinet

**Monday 17 June 2019 at 4.00 pm**

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

### Membership:

#### Lead Member Councillors:

#### Portfolio

M Butt (Chair)

McLennan (Vice-Chair)

Agha

Farah

Hirani

Miller

M Patel

Krupa Sheth

Southwood

Tatler

Leader of the Council

Deputy Leader of the Council and Lead Member for  
Resources

Lead Member for Schools, Employment and Skills

Lead Member for Adult Social Care

Lead Member for Public Health, Culture & Leisure

Lead Member for Community Safety

Lead Member for Children's Safeguarding, Early Help  
and Social Care

Lead Member for Environment

Lead Member for Housing & Welfare Reform

Lead Member for Regeneration, Highways & Planning

**For further information contact:** Thomas Cattermole, Head of Executive and  
Member Services, Tel. 020 8937 5446, [thomas.cattermole@brent.gov.uk](mailto:thomas.cattermole@brent.gov.uk)

For electronic copies of minutes, reports and agendas, and to be alerted when the  
minutes of this meeting have been published visit: **[democracy.brent.gov.uk](http://democracy.brent.gov.uk)**

**The press and public are welcome to attend this meeting**

## **Notes for Members - Declarations of Interest:**

If a Member is aware they have a Disclosable Pecuniary Interest\* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent and must leave the room without participating in discussion of the item.

If a Member is aware they have a Personal Interest\*\* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent.

If the Personal Interest is also significant enough to affect your judgement of a public interest and either it affects a financial position or relates to a regulatory matter then after disclosing the interest to the meeting the Member must leave the room without participating in discussion of the item, except that they may first make representations, answer questions or give evidence relating to the matter, provided that the public are allowed to attend the meeting for those purposes.

### **\*Disclosable Pecuniary Interests:**

- (a) **Employment, etc.** - Any employment, office, trade, profession or vocation carried on for profit gain.
- (b) **Sponsorship** - Any payment or other financial benefit in respect of expenses in carrying out duties as a member, or of election; including from a trade union.
- (c) **Contracts** - Any current contract for goods, services or works, between the Councillors or their partner (or a body in which one has a beneficial interest) and the council.
- (d) **Land** - Any beneficial interest in land which is within the council's area.
- (e) **Licences** - Any licence to occupy land in the council's area for a month or longer.
- (f) **Corporate tenancies** - Any tenancy between the council and a body in which the Councillor or their partner have a beneficial interest.
- (g) **Securities** - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

### **\*\*Personal Interests:**

The business relates to or affects:

(a) Anybody of which you are a member or in a position of general control or management, and:

- To which you are appointed by the council;
- which exercises functions of a public nature;
- which is directed is to charitable purposes;
- whose principal purposes include the influence of public opinion or policy (including a political party of trade union).

(b) The interests of a person from whom you have received gifts or hospitality of at least £50 as a member in the municipal year;

or

A decision in relation to that business might reasonably be regarded as affecting the well-being or financial position of:

- You yourself;
- a member of your family or your friend or any person with whom you have a close association or any person or body who is the subject of a registrable personal interest.

# Agenda

Introductions, if appropriate.

Item	Page
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<b>1</b>	<b>Apologies for Absence</b>	
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<b>2</b>	<b>Declarations of Interest</b>	
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Members are invited to declare at this stage of the meeting, the nature and existence of any relevant disclosable pecuniary or personal interests in the items on this agenda and to specify the item(s) to which they relate.

<b>3</b>	<b>Minutes of the Previous Meeting</b>	1 - 2
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To approve the minutes of the previous meeting held on 20 May 2019 as a correct record.

<b>4</b>	<b>Matters Arising (if any)</b>	
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To consider any matters arising from the minutes of the previous meeting.

<b>5</b>	<b>Petitions (if any)</b>	
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To discuss any petitions from members of the public, in accordance with Standing Order 66.

<b>6</b>	<b>Reference of item considered by Scrutiny Committees (if any)</b>	
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To consider any reference reports from any of the Council's three Scrutiny Committees.

a)	<b>Service Provision on Estates in Brent: Overview and Scrutiny Task Group</b>	3 - 26
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The report presents an update on the recommendations arising from the Service Provision on Estates Task group which were agreed by the Housing Scrutiny Committee.

**Ward Affected:**  
All Wards

**Lead Member:** Lead Member for Housing and Welfare Reform (Councillor Eleanor Southwood)  
**Contact Officer:** Jacqueline Barry-Purssell,  
Senior Policy and Scrutiny Officer  
Jacqueline.Barry-Purssell@brent.gov.uk

To present Cabinet with the recommendations from the members' overview and scrutiny task group which was set up to review contextual safeguarding.

**Ward Affected:**

All Wards

**Lead Member:**

Lead Member for Children's Safeguarding, Early Help and Social Care (Councillor Mili Patel)

**Contact Officer:** James Diamond, Scrutiny Officer

Tel: 020 8937 1068

james.diamond@brent.gov.uk

**Children and Young People reports****7 Roe Green Strathcona Consultation Report**

53 - 94

This report provides a summary of the informal consultation undertaken between 20 March 2019 and 7 May 2019 on a change in the age range of Roe Green Infant School and the closure of primary provision on the Roe Green Strathcona site from September 2020. It recommends a move to formal consultation, through publication of a statutory notice, on a change in the age range of Roe Green Infant School from 3-11 to 3-7, a reduction in the school's Published Admission Number (PAN) from 150 to 120 and a phased closure of provision on the Roe Green Strathcona site.

**Ward Affected:**

Barnhill; Fryent; Kenton; Northwick Park; Preston; Queensbury; Welsh Harp

**Lead Member:**

Lead Member for Schools, Employment &amp; Skills (Councillor Amer Agha MB BS, MSc, PHCM)

**Contact Officer:** Brian Grady, Operational Director, Safeguarding, Partnerships & Strategy

Tel: 0208 937 4173 Brian.Grady@brent.gov.uk

**8 Multi-agency safeguarding children arrangements in Brent - 2019 onwards**

95 - 118

The report presents the proposed partnership safeguarding oversight arrangements for Brent's children and young people. It summarises the national context and the proposed model to be implemented by 29 September 2019.

**Ward Affected:**

All Wards

**Lead Member:**

Lead Member for Children's Safeguarding, Early Help and Social Care (Councillor Mili Patel)

**Contact Officer:** Meenara Islam, Strategic Partnerships Manager

Tel: 0208 937 1479

meenara.islam@brent.gov.uk



## Community Well-being reports

### 9 Allocations Policy 119 - 278

The report recommends changes to the scheme for allocation of social housing following formal consultation with members, residents, interested organisations and council departments.

**Ward Affected:**  
All Wards

**Lead Member:** Lead Member for Housing and Welfare Reform (Councillor Eleanor Southwood)  
**Contact Officer:** Laurence Coaker, Head of Housing Needs  
Tel: 020 8937 2788  
laurence.coaker@brent.gov.uk

## Chief Executive's reports

### 10 Brent Community Lottery 279 - 302

The reports presents proposals for a Brent Community Lottery.

**Ward Affected:**  
All Wards

**Lead Member:** Lead Member for Public Health, Culture and Leisure (Councillor Krupesh Hirani)  
**Contact Officer:** Pascoe Sawyers, Head of Strategy and Partnerships  
Tel: 020 8937 1045  
pascoe.sawyers@brent.gov.uk

### 11 Q4 2018/19 Corporate Performance Report 303 - 350

The report and the performance scorecard (Appendix A) set out the position on the Council's performance in the fourth quarter of 2018/19.

**Ward Affected:**  
All Wards

**Lead Member:** Deputy Leader (Councillor Margaret McLennan)  
**Contact Officer:** Irene Bremang, Head of Performance & Improvement  
Tel: 020 8937 1822,  
irene.bremang@brent.gov.uk

### 12 Exclusion of Press and Public

No items identified in advance of the meeting.

### 13 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. Any decisions taken urgently under this heading must comply with the provisions outlined in paragraph's 12 and 39 of the Council's Access to Information Rules (part 2 of the Constitution).

**Date of the next meeting:            Monday 15 July 2019**



Please remember to set your mobile phone to silent during the meeting.

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



## LONDON BOROUGH OF BRENT

### MINUTES OF THE CABINET Monday 20 May 2019 at 4.00 pm

PRESENT: Councillor M Butt (Chair) and Councillors Agha, Farah, Hirani, Miller, M Patel, Krupa Sheth, Southwood and Tatler

1. **Apologies for Absence**

Apologies for absence were received from Councillor McLennan (Deputy Leader).

2. **Declarations of Interest**

None.

3. **Minutes of the Previous Meeting**

RESOLVED: -

that the minutes of the previous meeting held on 15 April 2019 be approved as an accurate record of the meeting.

4. **Matters Arising (if any)**

None.

5. **Petitions (if any)**

None.

6. **Appointments of Cabinet Committees and Other bodies**

RESOLVED:

- i. Cabinet confirmed that the appointments of Cabinet Committees and other bodies be approved as set out in the report.

7. **Reference of item considered by Scrutiny Committees (if any)**

None.

8. **Exclusion of Press and Public**


There were no exclusions of press and public.

9. **Any other urgent business**

None.

The meeting ended at 4.10 pm

COUNCILLOR MUHAMMED BUTT  
Chair

	<b>Cabinet</b> 17 June 2019
	<b>Report from the Assistant Chief Executive</b>
<b>Service Provision on Estates in Brent: Overview and Scrutiny Task Group</b>	

<b>Wards Affected:</b>	All
<b>Key or Non-Key Decision:</b>	Non-Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>No. of Appendices:</b>	One: <ul style="list-style-type: none"> <li>Appendix 1 - Scrutiny Task Group Report</li> </ul>
<b>Background Papers:</b>	None
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	Jackie Barry-Purssell – Senior Policy and Scrutiny Officer <a href="mailto:Jacqueline.Barry-purssell@brent.gov.uk">Jacqueline.Barry-purssell@brent.gov.uk</a> Tel. 0208 937 1958

## 1.0 Purpose of the Report

- 1.1 This is an update on the recommendations arising from the Service Provision on Estates task group which were agreed by the Housing Scrutiny Committee.

## 2.0 Recommendation(s)

- 2.1 To note the contents of the report and the recommendations made to Cabinet.

## 3.0 Detail

- 3.1 The Housing Scrutiny Committee can commission evidence based reviews of a policy area of function of the local authority, which are led by non-executive members. As part of the work programme discussion, members of the committee discussed a variety of areas which they would like to examine in greater detail. One of these was **Service Provision on Estates in Brent**.
- 3.2 The committee formally set up the members' task group on 29 November 2018. Committee agreed Councillor Long would chair the Task Group, and the other members would be Councillor Aden, Councillor Choudhary, Councillor Mitchell Murray, Councillor Stephens and Karin Jaeger (co-optee). This was an evidence-based review. The Task Group held a series of evidence gathering

sessions. Members of the Task Group were asked to develop recommendations and these are included in the attached report.

- 3.3 The report was presented to the Housing Scrutiny Committee on 25 April 2019 and the recommendations for Cabinet were agreed as below:

**Recommendation One: Consistency - Brent Standard**

The council should establish a Brent Standard so that residents know the level and quality of service they can expect from Registered Providers and Brent Housing and the council's contractors in terms of the services featured in this report. The Brent Standard to be supported by a Residents' Charter setting out how service requests can be made and detailing response times for all key services delivered. This will help ensure that Registered Providers are accountable to and subject to scrutiny from residents. Residents should be able to report on how well their landlord is fulfilling the commitments. The results should be available to the public.

**Recommendation Two: Information**

Provide accessible information (signposting to what services are delivered and by whom) to residents including an estate profile for each estate building on the approaches taken by Hackney and Lewisham. Examples of these can be seen at

<https://hackney.gov.uk/article/3866/Estate-services>

<https://www.lewishamhomes.org.uk/your-home/your-estate/>

**Recommendation Three: Waste Management and External Cleaning**

In renewing contracts for waste services on estates, the council should ensure that the needs of residents on estates are central. Services should be tailored so that they address the particular needs of people living in flats including a focus on increasing recycling. Ways of raising awareness of the benefits of recycling should be further explored. The approach to external cleaning on estates needs to be reviewed and improvements made.

**Recommendation Four: Complaints and Service Requests**

Registered Providers should provide complaint and service request data to the council on a monthly basis for discussion. This is particularly important where the complaints relate to services that the council or its contractor delivers. These should be reviewed alongside the complaints information for council-owned estates so that trends, hotspots and areas for attention can be identified and addressed. These should be reported regularly to the Scrutiny Committee.

**Recommendation Five: Transparency of Service Charges**

The transparency of service charges needs to be reviewed. Tenants and leaseholders must be clear about what they are paying for and the potential impacts of any increase in service charges.

**Recommendation Six: Parking**

The roll out of parking restrictions on estates (where the roads are adopted) needs to be revisited and progress agreed.

### **Recommendation Seven: Roads and Pavements**

The condition of roads and pavements on estates needs to be reviewed and actions put in place to improve their condition. Roads and pavements on new build should be designed up to an adoptable standard. Respective responsibility for management and maintenance needs to be made more transparent.

### **Recommendation Eight: Grounds maintenance design**

Working with service providers the council should review planting and landscape design and ensure that any future developments encourage grounds maintenance delivery rather than hinder it. In particular, new planting should be low maintenance. It should not act as a litter trap. Consideration should be given on how it looks throughout the seasons and over the years.

## **4.0 Financial Implications**

- 4.1 If a recommendation was to be implemented then the financial implications would need to be accounted for in a subsequent report to Cabinet.

## **5.0 Legal Implications**

- 5.1 The Council is a Best Value Authority in accordance with s 1(1) of the Local Government Act 1999. It is required to make arrangements to secure continuous improvement in the way it exercises its functions, having regard to economy, efficiency and effectiveness pursuant to s3 of the Local Government Act 1999. If a recommendation was to be implemented, then the legal implications would need to be accounted for in a subsequent report to Cabinet, which may include issues such as consultation and the current contractual arrangements that the Council has in place.

## **6.0 Equality Implications**

- 6.1 Brent is committed to equality, diversity and inclusion; the council is determined to be an exemplar of good practice in equality, diversity and human rights and it is our policy to treat everyone fairly and with respect. We aim to ensure that all our current and future residents, staff and stakeholders are treated fairly and receive appropriate, accessible services, and fair and equal opportunities.
- 6.2 This commitment requires that equality considerations play a key role in our decision-making processes and that our policies are fully compliant with the duties placed on us as a public sector body by the Equality Act 2010. Equality Analyses (EAs) ensure that we follow through on our commitment to equality and they provide a method for clearly demonstrating the necessary legal compliance.
- 6.3 The Equality Act 2010 replaced the pre-existing anti-discrimination laws with a single Act. The legislation covers the exercise of public functions, employment and work, goods and services, premises, associations, transport and education. The act prohibits victimisation and harassment, and all of the

following forms of discrimination: direct; indirect; by association; by perception; or discrimination arising from disability. The detail regarding the Public Sector Equality Duty pursuant to section 149 of the Equality Act 2010 is set out in paragraph 5.3 above.

- 6.4 There are no immediate equalities implications arising from this report for the local authority. However, if the proposed recommendations are implemented then they would help to reduce wider social inequalities in the borough, particularly for people who live on estates.

## **7.0 Consultation with Ward Members and Stakeholders**

- 7.1 Ward members who are committee members have been involved in this report.

## **8.0 Human Resources/Property Implications (if appropriate)**

- 8.1 The task group report does not have human resources/property implications.

**Report sign off:**

**PETER GADSDON**  
Assistant Chief Executive



## Appendix 1



### **Service Provision on Estates in Brent**

An Overview and Scrutiny Task Group Report

**Chair, Councillor Janice Long**

**Housing Scrutiny Committee - April 2019**

### **Task Group Membership:**



Councillor Janice Long (**Chair**)



Councillor Abdi Aden,



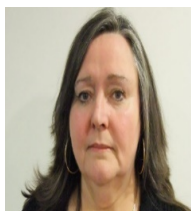
Councillor Shafique Choudhary,



Councillor Wilhelmina Mitchell Murray,



Councillor Thomas Stephens,



Karin Jaeger (co-opted member)

**The Task Group was set up by Brent Council's Housing Scrutiny Committee on 29 November 2018.**

**Scrutiny Contact:** Jackie Barry-Purssell, Senior Policy and Scrutiny Officer, Strategy and Partnerships, Brent Civic Centre, Engineers Way, Wembley, Middlesex HA9 0FJ  
**020 8937 1958 [jacqueline.barry-purssell@brent.gov.uk](mailto:jacqueline.barry-purssell@brent.gov.uk)**

**@Brent Council #scrutiny Brent**

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## 1. The Chair's Foreword

Brent Council takes pride in all the services we provide for residents. Those delivered on Brent's housing estates are particularly important to the people who live there and to ensuring a good quality of life in vibrant, sustainable neighbourhoods our people can be glad to call home. Their delivery is more complicated with a mixed economy – residents have to deal with a range of agencies and, in particular with the Registered Providers managing each estate. Getting it right is less straightforward but even more important.

This is why we have prepared this report. We have focussed on three sites – Chalkhill, Stonebridge and Church End/Roundwood – our three earliest regeneration areas. Each is managed by a different provider Hyde (Stonebridge), Metropolitan (Chalkhill) and Catalyst (Church End/Roundwood). In each housing management has to be integrated with that of the public realm, with services like grounds maintenance, waste and street cleaning, parking and highways.

We have found that the sheer number and range of people involved in service delivery can make it confusing to residents to know who to raise any issues with. Too often they receive a variable level of service.

We believe there are things that can be done across the council to improve the quality and accessibility of services. This report makes a number of recommendations. We look forward to seeing how these are delivered.

I would like to thank all those who gave their time to meet with me and the other members of the Task Group and the valuable insights they gave. I would like to give my personal thanks to the members of the Task Group – Councillors Aden, Choudhary, Mitchell-Murray, and Stephens and our co-opted member Karin Jaeger for all their hard work on this important subject.

**Cllr Janice Long – Chair**

## 2. Recommendations

**The Scrutiny Task Group makes the following recommendations to Brent Council's Cabinet:**

### **Recommendation One: Consistency - Brent Standard**

The council should establish a Brent Standard so that residents know the level and quality of service they can expect from Registered Providers and Brent Housing and the council's contractors in terms of the services featured in this report. The Brent Standard to be supported by a Residents' Charter setting out how service requests can be made and detailing response times for all key services delivered. This will help ensure that Registered Providers are accountable to and subject to scrutiny from residents. Residents should be able to report on how well their landlord is fulfilling the commitments. The results should be available to the public.

### **Recommendation Two: Information**

Provide accessible information (signposting to what services are delivered and by whom) to residents including an estate profile for each estate building on the approaches taken by Hackney and Lewisham. Examples of these can be seen at

<https://hackney.gov.uk/article/3866/Estate-services>

<https://www.lewishamhomes.org.uk/your-home/your-estate/>

### **Recommendation Three: Waste Management and External Cleaning**

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### **Recommendation Four: Complaints and Service Requests**

Registered Providers should provide complaint and service request data to the council on a monthly basis for discussion. This is particularly important where the complaints relate to services that the council or its contractor delivers. These should be reviewed alongside the complaints information for council-owned estates so that trends, hotspots and areas for attention can be identified and addressed. These should be reported regularly to the Scrutiny Committee.

### **Recommendation Five: Transparency of Service Charges**

The transparency of service charges needs to be reviewed. Tenants and leaseholders must be clear about what they are paying for and the potential impacts of any increase in service charges.

### **Recommendation Six: Parking**

The roll out of parking restrictions on estates (where the roads are adopted) needs to be revisited and progress agreed.

### **Recommendation Seven: Roads and Pavements**

The condition of roads and pavements on estates needs to be reviewed and actions put in place to improve their condition. Roads and pavements on new build should be designed up to an adoptable standard. Respective responsibility for management and maintenance needs to be made more transparent.

### **Recommendation Eight: Grounds maintenance design**

Working with service providers the council should review planting and landscape design and ensure that any future developments encourage grounds maintenance delivery rather than hinder it. In particular, new planting should be low maintenance. It should not act as a litter trap. Consideration should be given on how it looks throughout the seasons and over the years.

## **3. Methodology**

This was an evidence-based review. The Task Group held a series of evidence gathering sessions. These included a series of meetings with senior officers from the council's Housing and Environment departments including the Operational Director of Housing, Head of Parking and Street Lighting, Public Realm Performance Manager, Head of Neighbourhood Management and the Head of Housing and Neighbourhoods. The Cabinet Member for Housing and Welfare Reform also attended a Task Group meeting. In addition, discussions took place with the Registered Providers – Hyde, Catalyst and Metropolitan and the Operations Director for the cleaning contractor – Wettons. A full list of participants in the Task Group's evidence gathering can be found in appendix two of this report. The evidence gathering was combined with extensive research.

The scope and terms of reference were agreed on Thursday 29 November 2018. Members of the Task Group took part in five meetings corresponding to the terms of reference in the original scoping paper. Broadly, the themes for each of the meetings were:

- **Meeting One** – 11 December – Regional and Local Context
- **Meeting Two** – 8 January – Waste Management, Street Lighting and Parking
- **Meeting Three** – 12 February – Neighbourhood Management, Cleaning and Customer Services
- **Meeting Four** – 5 March – Strategic Overview – Cabinet Member Housing and Welfare Reform, review of evidence and formulation of key recommendations
- **Meeting Five** – 2 April - Draft report and recommendations discussion

In addition, site visits were undertaken to Chalkhill, Stonebridge and Church End/Roundwood Estates to “reality check” service delivery as well as to speak to representatives from the Registered Providers – Catalyst (Roundwood/Church End), Hyde (Stonebridge) and Metropolitan (Chalkhill).

Recommendations for the Cabinet were developed according to existing legislation for local authority scrutiny, which means that a local authority executive is not compelled to act on a recommendation; however, it must respond to any recommendations made by an overview and scrutiny review within **two months**.

## 4. Brent's Context and the Council

The London Borough of Brent is the sixth largest borough in the capital in terms of population with an estimated 332,100 residents. The population has grown significantly, and it is one of the most multi-cultural areas in the country with many different languages spoken in the borough. Brent is characterised by large estates of regenerated former council housing with estates like South Kilburn, Stonebridge, and Chalkhill, alongside neighbourhoods with high rates of owner occupation which have experienced significant gentrification.

Brent has approximately 117,000 dwellings. Of these 8,000 are managed by the council on social/affordable rents and 3,500 on leaseholds. A further 20,221 are managed by Registered Providers. Some 55 Registered Providers (RPs) have stock in the borough, with 12 holding the largest proportion of stock. Since 1993 RP-managed stock has increased by 108%, an increase above the London average. **(Source: Brent Responsible Growth Strategy. Housing Theme)**

The major housing regeneration schemes of Stonebridge, Church End, Chalkhill, South Kilburn (on-going) and Barham Park have seen the management of over 9,000 council units transferred to Housing Associations (Registered Providers).

Since the 1980s the split of rental accommodation in the borough has therefore shifted considerably, with a growth in HA units followed by a resurgence in private renting, with a gradually larger proportion of properties in the private rental sector over time.

In recent years, private-sector led redevelopment, particularly at Wembley Park, has led to new high-rise housing. The borough's largest town centres are in Harlesden, Willesden, Kilburn, Kingsbury, Neasden, and Wembley. While there has been investment and improvement of the town centres they have also experienced decline. The borough has approximately 1,000 acres of open space; the largest include Fryent Country Park, and Gladstone Park in Dollis Hill.

Brent Council is organised into five departments: Chief Executive's, Children and Young People; Community Wellbeing; Regeneration and Environmental Services and Resources. Housing sits within the Community Wellbeing Department and is led by the Strategic Director. Political leadership is provided by the Lead Member for Housing and Welfare Reform.



While the borough's population has grown, the council's core funding from central government has fallen by 63% in real terms since 2010. Departmental expenditure has declined, non-statutory services and the workforce have reduced.

The Budget 2019/2020 has now been agreed, confirming continued contraction of revenue expenditure for the local authority. The overall day-to-day expenditure across all departments, also known as the General Fund, will fall from £242.2million in 2018/2019 to £238.6million in 2019/20.

## 5. Background

This topic has been chosen because of the importance of ensuring a seamless service is delivered for those who live in the borough regardless of tenure or management. Feedback from residents shows that the public realm and how it is delivered is a high priority for those who live in Brent. As a universal service, it is what residents experience on a daily basis. Services on housing estates are delivered by a range of organisations delivering on behalf of the council and Registered Providers and/or their contractors. This Task Group has engaged with these key organisations.

An ambitious and co-ordinated approach is important for residents on all Brent housing estates to ensure that the services delivered meet the needs of users. This is of particular importance where various public realm activity takes place often in high housing density areas. Effective public realm delivery is a key cornerstone for future changes and long term investments.

There are a number of key stakeholders for this area of work - council departments (proposing public realm improvements and whose decisions have an impact on the public realm), Registered Providers, other public sector bodies and the private sector.

Key public realm principles include the need to ensure that the public realm is designed and delivered:

- In a coordinated, rational way, de-cluttered to ensure an inclusive environment
- With management and maintenance in mind;
- To stand the test of time;
- To promote a sense of ownership, respect, responsibility and community;

Services on council estates are delivered by key council contractors as follows:

- Waste Management – Veolia
- Grounds Maintenance – Veolia
- Parking – Wing Parking
- Estate Cleaning – Wettons
- Street Lighting – Bouygues (that fall within the remit of the council's parking and lighting service)

## 6. Regional Context

This work is set within the regional context of the London Housing Strategy, the Mayor's Environment Strategy and the London Plan.

The **London Housing Strategy** sets out the Mayor's plans to tackle the capital's housing crisis and his vision to provide all Londoners with a good quality home they can afford. The strategy was formally adopted in August 2018.

This strategy has five key areas:

- building more homes for Londoners
- delivering genuinely affordable homes
- high-quality homes and inclusive neighbourhoods
- a fairer deal for private renters and leaseholders
- tackling homelessness and helping rough sleepers

The Mayor published his **first integrated Environment strategy** in May 2018. In it he outlined the importance of public realm aspects in improving the quality of life for those who live, work and visit the area.

***“The state of London’s environment affects everyone who lives in and visits the city”. (Executive Summary – May 2018)***

Although the Mayor's powers to get involved in public realm on estates are limited, the principles that he referred to in his strategy are important. The strategy sets out a vision to 2050. It is focused on supporting good health and quality of life and on making the city a better place to live, work and do business.

The aims for 2050 are focused on – climate change (London will be a zero carbon city by 2050, with energy efficient buildings, clean transport and clean energy) waste (London will be a zero waste city. By 2026 no biodegradable or recyclable waste will be sent to landfill and by 2030 65 per cent of London's municipal waste will be recycled) and adapting to climate change (London and Londoners will be resilient to severe weather and longer-term climate change impacts. This will include flooding, heat risk and drought).

The outcomes outlined are:

- Greener
- Cleaner
- Ready for the Future

These are all important features of effective public realm delivery on housing estates.

**The London Plan** is the statutory Spatial Development Strategy for Greater London prepared by the Mayor of London (“the Mayor”) under the Greater London Authority Act 1999 (as amended) and associated regulations.

The London Plan sets out the Mayor's general policies for the development and use of land in Greater London and deals with the spatial development aspects of his

other strategies. When published in its final form the Plan will comprise part of the statutory development plan for Greater London.

The current 2016 Plan (The London Plan consolidated with alterations since 2011) is still the adopted Development Plan, but the draft London Plan is a material consideration in planning decisions.

## 7. The Task Group

In its work the Task Group sought to gain an understanding of the barriers and solutions to service provision on Registered Provider managed housing estates. It is clear that there is no one solution but a number of opportunities to make recommendations that would improve the services delivered and ensure a good standard of service to residents regardless of landlord or tenure. We have reached conclusions about approaches the council should take and we have grouped our key findings under eight themes, as follows:

- 1. Consistency – Brent Standard**
- 2. Information**
- 3. Waste Management and External Cleaning**
- 4. Complaints and Service Requests**
- 5. Transparency of service charges**
- 6. Parking**
- 7. Roads and Pavements**
- 8. Grounds maintenance design**

In total we have made eight key recommendations, but our findings in fact highlight a broader range of approaches the council should consider. The council may wish to take some time in considering what success would look like in 20 years given the range of developments across the borough, particularly for residents who live on estates, given that these are likely to be managed by a range of landlords.

Currently, there are 55 Registered Providers operational in the borough. Their relationship with the council is based on collaboration rather than regulation. Where more than one Registered Provider is operational on an estate there will be different landlords with different approaches. In these cases, join-up is really important. Task Group members recognise the challenge of balancing the needs of residents with the delivery of the most affordable housing. This is further complicated by the fact that residents on estates will live in homes with different tenures – social/affordable rent, shared ownership, leasehold and private rent. All should enjoy a similar standard of service.

The Task Group reviewed the key housing meetings that take place. To note are the Housing Strategy and Delivery Board organised by the council and bringing together the local authority and Registered Providers discusses and agrees housing strategy and delivery on a quarterly basis. At a local level, the South Kilburn Regeneration meeting meets on a quarterly basis to discuss the management of the Estate. The forum purpose is:

- Placemaking
- Engaging in the community
- Grounds maintenance
- Maintenance and Cleaning contracts
- Refuse
- Unadopted roads

## 8. Task Group Key Findings

### **Standards of Service**

The standards of service identified by the Task Group across the 3 case study areas varied considerably. Housing management is provided by different Registered Providers - Hyde (Stonebridge), Metropolitan (Chalkhill) and Catalyst (Roundwood/Church End). Public Realm services such as waste management, grounds maintenance, parking and cleaning are delivered by a variety of providers contracted and managed by the Council. This can lead to confusion, a lack of effective performance monitoring and management resulting in the needs of residents going unmet. Whilst Registered Providers strive to deliver a good service for residents this is not consistent across the board.

### **Recommendation One: Brent Standard**

The council should establish a Brent Standard so that residents know the level and quality of service they can expect from Registered Providers and Brent Housing and the council's contractors in terms of the services featured in this report. The Brent Standard to be supported by a Residents' Charter setting out how service requests can be made and detailing response times for all key services delivered. This will help ensure that Registered Providers are accountable to and subject to scrutiny from residents. Residents should be able to report on how well their landlord is fulfilling the commitments. The results should be available to the public.

### **Information for Residents**

The Task Group found that given the number of people and agencies involved in service delivery it can sometimes become confusing for residents about who they need to go to if they have issues/concerns. Although there are engagement processes in place for residents such as Hydewide Residents Voice (Stonebridge) and Hydewide Residents Eye – (an inspection group who scrutinise and make recommendations for service improvement through 4 service inspections a year), block champions, targeted communication with contractors and estate newsletters, there is still an opportunity to improve this further.

The Task Group found that residents don't always have the information they need for the services that are delivered on their estates. There is a range of reasons for this including lack of clarity about who delivers which services, lack of signposting and lack of engagement between residents and the providers of services. On some

estates, residents raise queries on services with the Registered Provider when in fact it should be the council and vice versa.

### **Recommendation Two: Information**

Provide accessible information (signposting to what services are delivered and by whom) to residents including an estate profile for each estate building on the approaches taken by Hackney and Lewisham. Examples of these can be seen at

<https://hackney.gov.uk/article/3866/Estate-services>

<https://www.lewishamhomes.org.uk/your-home/your-estate/>

### **Waste Management and External Cleaning**

Waste Management is of particular importance to public health and quality of life on estates. Veolia is the main council contractor providing waste management services, including refuse collection and recycling. Aside from ground floor properties, the majority of bins on estates are communal. Residents often assume that the RP is responsible for all maintenance issues, which is not the case. There also appears to be conflicting views on who cleans the communal bins including food waste bins.

The current waste contract spans 2014-2023 but has an option for extension for up to 7 years. The contract does not have recycling targets with a focus more on reducing waste. It provides for a flat rate payment for waste collection with any additional costs being met by the contractor. It does not include provision to clean bins. Recycling bins are old and their location could be more accessible. The same contractor is responsible for street cleaning. The top three issues that get raised by residents across the 3 case study estates are – missed collections, fly-tipping and the state of the bins (in particular rats and vermin).

All three areas have adopted streets which should be maintained by Brent / Veolia. However, the standards of cleaning by the Chalkhill new build are poor. This is evidenced by the build-up of leaf mould and litter in the kerbs and planted areas. The Task Group found that the side of Chalkhill Road containing the “scientist estate” is swept but the side containing the Metropolitan blocks is not swept. The RP has asked its own contractors to undertake this work due to the lack of progress from the council’s contractor.

The Waste Contract Board meets on a monthly basis and includes representatives from housing, neighbourhood management and the contractor. Neighbourhood Mangers also sit in on “new build” proposals.

The waste management contract will soon be under review and it will be important that the issues faced by residents on estates are central in this review.

### **Recommendation Three: Waste Management and External Cleaning**

In renewing contracts for waste services on estates, the council should ensure that the needs of residents on estates are central. Services should be tailored so that they address the particular needs of people living in flats including a focus on increasing recycling. Ways of raising awareness of the benefits of recycling should

be further explored. The approach to external cleaning on estates needs to be reviewed and improvements made.

### **Complaints and Service Requests**

Registered Providers operate their own individual complaints and service request systems. The Task Group reviewed the complaints and service requests received and these were focused mainly on housing repairs. The council operates its own complaints and service requests process. However, the Task Group found that complaints information was not regularly shared between the council and the Registered Providers. In addition, performance monitoring of complaints across all estates including hotspot areas was not undertaken in a consistent way.

### **Recommendation Four: Complaints and Service Requests**

Registered Providers should provide complaint and service request data to the council on a monthly basis for discussion. This is particularly important where the complaints relate to services that the council or its contractor delivers. These should be reviewed alongside the complaints information for council-owned estates so that trends, hotspots and areas for attention can be identified and addressed. These should be reported regularly to the Scrutiny Committee.

### **Transparency of Service Charges**

The Task Group reviewed service charges across all three sites. These vary considerably from site to site. Typically, the leaseholders and tenants at estate/block level can receive the following service charges:

- Gardening & Grounds Maintenance
- External Cleaning
- Communal utilities
- Internal cleaning
- Building repairs and maintenance
- Statutory testing and servicing

The apportionment of the service charges that each individual leaseholder will receive depends on the method set out for this in the lease, meaning the cost will vary from block to block. The Task Group were made aware of two examples Maple Grove and Belvedere Way where the “right to buy” approach appears to have caused service charges to be borne by the remaining tenants and apparently resulting in high service charges. Consideration needs to be given to how service charges are deployed in situations such as these.

The Task Group noted that the service charges needed greater transparency as well as the inclusion of optional services and how much these would cost.

### **Recommendation Five: Transparency of Service Charges**

The transparency of service charges needs to be reviewed. Tenants and leaseholders must be clear about what they are paying for and the potential impacts of any increase in service charges.

## **Parking**

A feature of all three sites that the Task Group identified was that, apart from event day parking on Chalkhill, there were no parking controls on the estates. However, there are clearly parking pressures. There is little visible spare capacity during the day and parking pressures increase in the evening and night. This has resulted in double parking and parking on pavements/kerb buildouts. Bollards have been installed to control parking at corners and on kerb buildouts but there are few enforceable double yellow lines. There has been double parking in the Catalyst new build area which has blocked access by emergency vehicle.

The RPs have introduced parking controls on their own land, mainly car parks. But the council-maintained streets on estates have no parking controls. The Catalyst (Church End/Roundwood) new build are next to the CPZs for Harlesden, Stonebridge has extra flats and pressures from Harlesden station, Chalkhill is near Wembley Park station. Much of the parking at the new build properties in Chalkhill is at 90 degrees to the pavement. This often leads to vehicles overhanging the pavement, which in turn restricts the width of the pavement for pedestrians. Often this angle of parking is dictated by the design of the landscaping. The Task Group found that the quality of the road / car park is often poor on estates / flats managed by both the council and RPs. Pavements are often damaged by vehicle encroachment.

In the future electric charging points may have to be installed on these estates. There needs to be some form of parking control so they can be accessed by the local residents and information provided as to the number of parking places that are required.

### **Recommendation Six: Parking**

The roll out of parking restrictions on estates (where the roads are adopted) needs to be revisited and progress agreed.

## **Roads and Pavements**

The condition of roads and pavements in some of estates visited by the Task Group was poor, for example Church End traditional. Boundary issues in terms of who maintains and manages the roads and pavements were also raised with the Task Group.

### **Recommendation Seven: Roads and Pavements**

The condition of roads and pavements on estates needs to be reviewed and actions put in place to improve their condition. Roads and pavements on new build should be designed up to an adoptable standard. Respective responsibility for management and maintenance needs to be made more transparent.

## **Grounds maintenance design**

The design of grounds planting and landscaping that need maintaining needs to be reviewed. The Task Group found that some layouts lend themselves to difficulties in terms of maintenance as well as attracting dumping of bulky waste and fly-tipping.

Residents had also raised complaints about vermin. Over time some planted areas an appear unkempt because of the type of planting.

**Recommendation Eight: Grounds maintenance design**

Working with service providers the council should review planting and landscape design and ensure that any future developments encourage grounds maintenance delivery rather than hinder it. In particular, new planting should be low maintenance. It should not act as a litter trap. Consideration should be given on how it looks throughout the seasons and over the years.



## APPENDIX A - TASK GROUP MEMBERSHIP

<b>Chair</b>	Councillor Janice Long
<b>Members</b>	<ol style="list-style-type: none"><li>1. Councillor Abdifatah Aden</li><li>2. Councillor Shafique Choudhary</li><li>3. Councillor Wilhelmina Mitchell Murray</li><li>4. Councillor Thomas Stephens</li><li>5. Karin Jaeger (co-optee)</li></ol>

The Senior Policy and Scrutiny Officer who supported the work of the Task Group was Jackie Barry-Purssell

## APPENDIX B – PARTICIPANTS


The views expressed in this report are those of the Task Group. However, during their investigations the group met with or consulted all of the following and the Task Group is extremely grateful to all the participants for their valuable input, insight and challenge.

<b>Brent Council</b>	<ul style="list-style-type: none"> <li>• Councillor Eleanor Southwood, Lead Member for Housing and Welfare Reform</li> <li>• Brent - Operational Director of Housing – Hakeem Osinaike</li> <li>• Brent - Head of Parking and Street Lighting – Gavin Moore</li> <li>• Brent - Public Realm Performance Manager – Ilana Shaw</li> <li>• Brent – Head of Neighbourhood Management – Simon Finney</li> <li>• Brent – Head of Housing and Neighbourhoods – Troy Francis</li> <li>• Wettons - Operations Director - Clive Robinson –</li> </ul> <p><b>Registered Providers</b></p> <ul style="list-style-type: none"> <li>• Metropolitan Thames Valley Housing (Chalkhill) - Durrant Morris – Housing Services Manager</li> <li>• Catalyst Housing Ltd (Church End/Roundwood) - Kemy George – Neighbourhood Experience Manager</li> <li>• Hyde (Stonebridge) - Benjamin Bankole Bello - Head of Housing</li> </ul>
<b>Sharing Good Practice – Other Councils</b>	<ul style="list-style-type: none"> <li>• Hackney Council</li> <li>• Lewisham Council</li> </ul>

## **APPENDIX C – TERMS OF REFERENCE**

- a) Understand the regional policy for service provision on housing estates including public realm activity.
- b) Understand the current customer facing and public realm activity on estates from the perspective of those who deliver the services.
- c) Understand how tenure mix has worked/changed.
- d) Gain an overview of leaseholder and tenant service charges.
- e) Review how parking pressures have changed including bicycle storage demand and provision of electric charging points.
- f) Gain an understanding of waste management provision.
- g) Evaluate the contracts in operation.
- h) Review any changes proposed.
- i) Highlight and learn from case studies of good practice.
- j) Review the co-ordination, planning and co-operation between different agencies and organisations.
- k) Develop recommendations for the council's Cabinet which are focused on the improvement of service provision on estates by the council and its partners.

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 <b>Brent</b>	<b>Cabinet</b> 17 June 2019
	<b>Report from the Assistant Chief Executive</b>
<b>Contextual Safeguarding: Overview and Scrutiny Task Group</b>	

<b>Wards Affected:</b>	All
<b>Key or Non-Key Decision:</b>	Non-key
<b>Open or Part/Fully Exempt:</b>	Open
<b>No. of Appendices:</b>	One: <ul style="list-style-type: none"> <li>Appendix 1 – Scrutiny Task Group Report</li> </ul>
<b>Background Papers:</b>	None
<b>Contact Officer:</b>	James Diamond, Scrutiny Officer, Strategy and Partnerships <a href="mailto:james.diamond@brent.gov.uk">james.diamond@brent.gov.uk</a> Tel. 020 8937 1068

## 1.0 Purpose of the Report

- 1.1 To present Cabinet with the recommendations from the members' overview and scrutiny task group which was set up to review contextual safeguarding.

## 2.0 Recommendation(s)

- 2.1 Cabinet to note the five recommendations and the task group's final report.

## 3.0 Background and Detail

- 3.1 The Community and Wellbeing Scrutiny Committee can commission evidence-based reviews, which are led by non-executive members, of a policy area or function of the local authority. As part of the work programme discussion, members of the committee discussed a variety of areas which they would like a task group to review in greater detail, including contextual safeguarding.
- 3.2 Contextual safeguarding is a commitment in the Borough Plan 2019-2023, and safeguarding was felt to be a highly relevant area for a scrutiny review in terms of corporate priorities as well as meeting concerns of the borough's residents. For the above reasons, the committee proposed that its 2018/19 work programme would include a task group to review contextual safeguarding and

how this new approach could be introduced more widely across the council. The committee formally set up the members' task group on 8 October 2018, and agreed that Councillor Hylton would chair the task group, and the other members would be Councillor Patterson and Councillor Donnelly-Jackson.

- 3.3 Members of the task group were asked by the committee to develop up to five recommendations for the Cabinet. On 30 January, the task group presented an interim report to the Community and Wellbeing Scrutiny Committee which included early feedback about their findings. At the Community and Wellbeing Scrutiny Committee on 27 March 2019, the report was presented by Councillor Hylton, and it was agreed that the task group's five recommendations should be presented to Cabinet. Each of the recommendations as well as the results of the evidence-gathering by the task group, are set out in detail in the report.

#### **4.0 Financial Implications**

- 4.1 If a recommendation was to be accepted and implemented then the financial implications would need to be considered by the Cabinet. However, none of the task group's recommendations in the final report have significant financial or Budget implications.

#### **5.0 Legal Implications**

- 5.1 There were no discussions of individual cases as part of the task group's work. Information did not include family court proceedings papers which require authorisation from the court before disclosure under the Family Procedure Rules 12.73(1) (b).

#### **6.0 Equality Implications**

- 6.1 There are no immediate equalities implications arising from this report for the local authority. However, if the proposed recommendations are accepted and implemented then they would help to reduce wider social inequalities in the borough, particularly for groups overrepresented in safeguarding concerns.

#### **7.0 Consultation with Ward Members and Stakeholders**

- 7.1 Ward members who were task group members were involved in this report.

#### ***REPORT SIGN-OFF***

***PETER GADSDON***

Assistant Chief Executive



# **Contextual Safeguarding in Brent**

An Overview and Scrutiny Task Group Report

**Chair, Councillor Orleen Hylton**

**Community and Wellbeing Scrutiny Committee**

**March 2019**

**Task group membership**

Councillor Orleen Hylton, task group chair

Councillor Fleur Donnelly-Jackson

Councillor Luke Patterson

**The task group was set up by Brent Council's Community and Wellbeing Scrutiny Committee on 8 October 2018.**

**Committee Contacts:**

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## **Chair's Foreword**

Many residents will be aware of the serious incidents of youth violence in Brent involving adolescent children. Sadly, some people have been affected personally by incidents of knife crime, acts of serious youth violence, and gangs.

To address this situation Brent Council is now developing its own approach to what is called contextual safeguarding. Simply put, it means addressing risks to adolescents which are outside their families. Contextual safeguarding is new and the council is at an early stage of developing its approach. That has meant that as members we have been able to review contextual safeguarding and offer our perspectives at a timely stage. While we are not safeguarding professionals we do represent our communities and are well aware of the problems many adolescent children have and what the risks to them are in the borough's high streets, parks, and from the digital world of social media.

I think that the task group has come away with a sense that even in these difficult times for local government there are things that can be done across the local authority to help safeguard adolescent children using a 'contextual' approach, and we look forward to seeing how they will develop.

I would like to thank all those who gave up their time to meet with me and the other members of the task group while we carried out our work, and thank them for the many discussions we had. Finally, I would like to say a thank you to Councillor Luke Patterson and Councillor Fleur Donnelly-Jackson, who served on the task group, for their valuable input and suggestions.

**Councillor Orleen Hylton**

**Chair, Overview and Scrutiny Task Group**

## **Recommendations:**

**The Overview and Scrutiny Task Group makes the following recommendations to Brent Council's Cabinet:**

**Recommendation 1:** To support bringing together representatives from Transport for London, bus companies, and employee representatives with schools, further education colleges, the council, and statutory Boards to address concerns about adolescents on the transportation and bus network.

**Recommendation 2:** To further support organisations working with young people to promote and develop extra-school activities, particularly in the summer months, for Brent's adolescent children.

**Recommendation 3:** Brent's approach to contextual safeguarding should specifically develop its work with further education colleges to help address the risks faced by adolescent children in this context.

**Recommendation 4:** A future Social Media Strategy should include how the local authority can work in partnership with external organisations or companies to address areas of concern in adolescents using social media and being online which are identified by Brent Council's approach to contextual safeguarding.

**Recommendation 5:** To develop a one-off public information campaign working with partner organisations and the community to support the development of contextual safeguarding in Brent.

## Methodology

As part of this review the task group has focused on face-to-face meetings to gather qualitative evidence and to help inform its understanding of the contextual safeguarding approach. Members have met with the Strategic Director for Children and Young People, Operational Director Safeguarding, Partnerships and Strategy, Operational Director Integration and Improved Outcomes, and the Cabinet Member for Safeguarding, Early Help and Social Care. The task group also met with officers outside of the Children and Young People Department such as the Head of Community Protection, and Head of Planning, Transport and Licensing as well as representatives from secondary schools, a pupil referral unit, and the Independent Chair of the Brent Local Safeguarding Children Board (LSCB). Members of the task group took part in four meetings, set out in Appendix A, corresponding to the terms of reference in the original scoping paper, based around four themes. Broadly, the themes for each of the meetings were:

- overview of contextual safeguarding and the council
- implementing contextual safeguarding
- working with schools and the community
- resources, budget and strategic priorities.

The task group's work was focused on understanding contextual safeguarding from the perspectives of different stakeholders, and it concentrated on the terms of reference of evaluating whether it is applicable to the borough, how it can be developed as a cross-cutting local authority initiative, and understanding how Brent's approach is being developed. The scoping paper limited the task group to making up to five recommendations to the council's Cabinet on the basis of the evidence it gathered. The task group gave an interim report to the Community and Wellbeing Scrutiny Committee on 30 January 2019 so there could be early input into the areas for recommendation by the committee. At that stage the task group had broad areas for recommendations. The task group has worked within the limits of the terms of reference, time and a fixed number of meetings. That means that the report is a partial evaluation and cannot be the complete picture. Working within the wider community will be a substantial area and when contextual safeguarding is looked at again by the scrutiny committee this area should be developed in more detail, including what input there could be from community

groups.

## **Chapter 1: Contextual Safeguarding**

### **Background**

1. Brent Council, working with partner organisations and agencies, has specific duties to safeguard and promote the welfare of children. The council works with other agencies to safeguard children by protecting them from abuse and maltreatment, promoting health and development, and ensuring they can grow up in a safe and caring environment. The local authority has powers to protect a child who is suffering or thought likely to be suffering from significant harm or neglect, and interventions are co-ordinated through a multi-agency child protection system. At a strategic level, the Brent Local Safeguarding Children Board (LSCB) brings together the local authority, police, NHS bodies and partner organisations in the borough to ensure there is co-ordinated and effective multi-agency work to safeguard children.<sup>1</sup>

2. Traditionally, the focus of children's safeguarding has been on risks to children which exist within a family such as domestic abuse or neglect. However, it is increasingly recognised by safeguarding practitioners that risks to an adolescent child can emerge outside their family homes. This challenges practitioners to recognise the limits of the current focus. In recent years, this awareness has crystallised into a new approach called contextual safeguarding, which has been developed by Dr Carlene Firmin at the University of Bedfordshire's International Centre. The approach as developed by Dr Firmin and other academics asks practitioners to address the risks present in 'contexts' outside the home such as peer groups, schools and neighbourhoods in which an adolescent child lives. Contextual safeguarding recognises that the adolescent child is increasingly spending a greater part of their time outside of the family and in these other 'contexts'. These contexts are often outside of the influence of families but can have an effect on them.

3. The risks can include youth violence, gangs, involvement in crime and county lines, and child sexual exploitation. In the context of neighbourhoods the risks to

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<sup>1</sup> Brent Local Safeguarding Children Board Annual Report 2016-17, p6

adolescents could be from street victimisation and robbery in parks and shopping centres. Within schools there can be risks from bullying, including sexual bullying, 'corridor culture', and issues with social media. In peer groups the risks can include partner violence, gangs, peer group violence, and harmful sexual behaviour. These risks can overlap and an adolescent child can be vulnerable to multiple risks.<sup>2</sup> Contextual safeguarding requires that these 'contexts' are assessed and effective interventions devised for safeguarding adolescent children.<sup>3</sup>

4. Contextual safeguarding is increasingly influential. Working with the Contextual Safeguarding Network, which has developed toolkits and leads on learning events, local authorities are integrating the approach into their practice. The London Borough of Hackney with the University of Bedfordshire was awarded £2million by Department for Education's Children's Social Care Innovation Fund in 2017 to introduce a contextual safeguarding framework.<sup>4</sup> So far, Hackney has introduced an initial framework for Contextual Safeguarding Conferences which is being piloted. The conference provides a multi-agency response to risks and is developing neighbourhood interventions in a particular area. There have also been school pilots, including a whole school assessment in a secondary school which focused on extra-familial risks; as well as a review of the Child and Family Assessment Framework. The Contextual Safeguarding Team in Hackney is also working with Children in Need, Looked After Children and Youth Offending Service to develop and support the practice.<sup>5</sup>

## **Guidance and Procedures**

5. Contextual safeguarding has been incorporated into guidance and procedures which Brent Council follows. In July 2018 the Government's statutory guidance 'Working Together to Safeguard Children' was updated and makes reference to contextual safeguarding. It emphasises that as well as threats to children's welfare

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<sup>2</sup> Carlene Firmin, *Contextual Risk, Individualised Responses: An Assessment of Safeguarding Responses to Nine Cases of Peer-on-Peer Abuse*, Child Abuse Review Vol. 27:42–57 (2018); Published online 21 February 2017 in Wiley Online Library, p43

<sup>3</sup> Carlene Firmin, *Contextual Safeguarding: An Overview of the Operational, Strategic and Conceptual Approach* (Contextual Safeguarding Network, 2017), pp.2-3

<sup>4</sup> [www.hackney.gov.uk/contextual-safeguarding](http://www.hackney.gov.uk/contextual-safeguarding)

<sup>5</sup> Full Year Report to Members 2017/18 Children and Families Service (London Borough of Hackney, October 2018), p10

from within a family, children may be vulnerable to abuse or exploitation from outside such as at a school or other educational institution, in peer groups, the wider community, or online. Threats include exploitation by criminal gangs, trafficking, online abuse, sexual exploitation and extremism leading to radicalisation. The updated national guidance is clear that assessments in these cases should focus on the environment of the child, and interventions should address that environment.<sup>6</sup>

6. The London Safeguarding Children Board is at present updating its own policies and procedures. The Board is developing a supplementary chapter on safeguarding adolescents in the London Child Protection Procedures. Informing this work is the London Safeguarding Adolescents Steering Group, supported by the University of Bedfordshire. The guidance will outline the procedures professionals should follow when responding to the risks young people face outside of the home.<sup>7</sup>

### **London Borough of Brent and Council**

7. The London Borough of Brent is an outer London area, and the sixth largest in the capital in terms of population with an estimated 332,100 residents. Population has grown significantly, and it is one of the most multi-cultural areas in the country with many different languages spoken in the borough. Brent is the mostly densely populated outer London borough.<sup>8</sup> Brent is characterised by large estates of regenerated former council housing such as at South Kilburn, Stonebridge, and Chalkhill, as well as neighbourhoods with high rates of owner occupation which have experienced significant gentrification. Around one third of households live in private-rented sector housing. In recent years, private-sector led redevelopment, particularly at Wembley Park, has led to new high-rise housing. The borough's largest town centres are in Harlesden, Willesden, Kilburn, Kingsbury, Neasden, and Wembley. While there has been investment and improvement of the town centres they have also experienced decline. The borough has approximately 1,000 acres of open space; the largest include Fryent Country Park, and Roundwood Park in Harlesden.

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<sup>6</sup> *Working Together to Safeguard Children*, HM Government (July 2018), p23

<sup>7</sup> [www.londonscb.gov.uk/london-safeguarding-adolescents-steering-group](http://www.londonscb.gov.uk/london-safeguarding-adolescents-steering-group)

<sup>8</sup> London Datastore, Greater London Authority

8. Brent Council is organised into five departments: Chief Executive's, Children and Young People; Community Wellbeing; Regeneration, Growth and Environmental Services; Resources. Children and Young People is led by a Strategic Director. Political leadership is provided by the Lead Member for Children's Safeguarding, Early Help and Social Care, and Statutory Lead Member for Schools, Employment and Skills. Ofsted inspected the Children and Young People department in May 2018, rating it as Good for overall effectiveness and outstanding for the experiences and progress of children in care and care leavers, but the experiences and progress of children who need help and protection were judged as Requires Improvement.<sup>9</sup> As well as working with pre-school and school-age children and young people, the department supports some young people, for example care leavers, up until the age of 25.

9. While the borough's population has grown, the council's core funding from central government has fallen by 63% in real terms since 2010, and departmental expenditure has declined.<sup>10</sup> Non-statutory services have reduced. After Council reduced the budget for Youth Services by £900,000 in 2015 all youth centres (except for Roundwood) and the detached Youth Work Team ceased from March 2016.

### **Brent's Adolescent Population**

10. Brent's adolescent population reflects the multi-cultural character of the area. There are an estimated 78,777 under 18s, or 24.3% of the total population. In secondary schools 55.2% of pupils have English as an additional language.<sup>11</sup> The largest minority ethnic groups of children are Asian/Asian British and Black African.

11. A significant number of adolescent children live in poverty. The proportion of secondary school pupils entitled to free school meals is 12.5%, and 18.2% of children live in low-income households. Despite this relative deprivation, Brent's adolescent children perform well at secondary school. Secondary school attainment is above the national and London average.<sup>12</sup> The College of North West London, which has about

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<sup>9</sup> Inspection of Local Authority Children's Services, Ofsted (July, 2018)

<sup>10</sup> Draft Budget Proposals 2019/20-2020/21, Brent Council Cabinet 15 October 2019, pp.

<sup>11</sup> Brent Council, Children and Young People Department, 3 December 2016

<sup>12</sup> Annual School Standards and Effectiveness Report 2016/17 (Community and Wellbeing Scrutiny Committee, March 2018)



10,000 students, was rated Good by Ofsted in 2016. Brent has four special schools and two pupil referral units.

12. While attainment for Brent's secondary school pupils is strong, some groups of children are performing less well. These include Black Caribbean boys, Somali boys and girls, and Travellers of Irish heritage. Improving the outcomes for these pupils and those children with special educational needs and disabilities (SEND) is a priority for the council and schools.

## **Chapter 2: Task Group Findings**

### **Brent's Approach**

13. Brent Council is now developing its own approach to contextual safeguarding, which is being led by the leadership team in Children and Young People in co-operation with officers in other departments. This work is at an early stage although a commitment to contextual safeguarding is in the Borough Plan 2019-2023, which was agreed by Council on 25 February 2019. So far, there has been discussion and commitments made by senior managers which have informed actions in the new Borough plan, and research is being done to better understand activity across the council. A report will be made to the Council Management Team which will set out Brent Council's approach, including governance and developing a co-ordination across departments. The task group is of the view that this should start to develop specific outcomes which can be monitored.

14. Brent's approach envisages that all departments view the services they run through the 'lens' of contextual safeguarding, and it will be a cross-council initiative to influence the different 'contexts'.<sup>13</sup> There is an emphasis on all departments contributing where they can, but there will be a particularly important role for Regeneration, Growth and Environmental Services, which oversees the council's responsibility for neighbourhoods and community safety. At the same time, it also sees a role for community organisations and leaders as well as organisations working with young people, such as Young Brent Foundation, to support contextual safeguarding.

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<sup>13</sup> Task Group Meeting 4

15. Contextual safeguarding is a generic model which can be adapted to suit the particular risks and needs of adolescent children in a local authority area. For its approach, Brent is defining adolescent children as those of secondary school age (11-18), starting from Year 7. The approach is also thinking about adolescent children as two discrete groups: the most high-risk, which is very small in number and who will probably already be in contact with services. For this group it is about adapting existing front-line work so it is informed by contextual safeguarding. The second group in effect encompasses every child. The approach with this group is emphasising public realm, and neighbourhood initiatives to minimize risks.

16. The development of Brent's approach is informed by key principles. One of the principles is the local authority working closely with two statutory boards – the Brent Local Safeguarding Children Board and the Brent Community Safety Partnership. Brent LSCB is also committed to a contextual safeguarding approach in its work. In January 2018, it organised a community learning event to after high-profile incidents of youth violence, which was addressed by Dr Carlene Firmin.<sup>14</sup> The approach strongly informs the Safer Brent Community Strategy 2018-2021, which commits to reducing vulnerability and increasing safeguarding as priorities, safeguarding those at risk of Child Sexual Exploitation, and reducing the impact of gangs and knife crime.<sup>15</sup> The other principles of Brent's approach include being preventative and responsive, and listening to the views of adolescent children, and their families.

17. Contextual safeguarding has already started to influence practice in the local authority ahead of any formal plan to develop it. The task group was given an example of how after stabbings of two young people in Kingsbury, there was a response by agencies, including representatives from the Youth Offending Service and Police, which developed a 'map' based on contextual safeguarding. It looked at how the area around the town centre could be made safer and what resources needed to be put in. Another example has been the day-to-day work of the Youth Offending Service which has already introduced Safety Mapping for those young people it works with. They are asked to indicate the neighbourhoods in the borough which they feel safe, using a red-amber-green system, and if a young person feels

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<sup>14</sup> Brent Local Safeguarding Children Board Annual Report 2017-18

<sup>15</sup> Safer Brent: Brent Community Safety Strategy 2018-2021, pp.8-42

unsafe, for example, in travelling to school or attending an appointment then an appropriate plan is put in place while they are in the area. <sup>16</sup>

18. Contextual safeguarding has already started to influence existing internal structures. A Vulnerable Adolescents' Panel was set up in late 2016 and is chaired by the Operational Director for Integration and Improved Outcomes, and is attended by the Head of Community Protection, as well as police and health representatives. The Panel has assessed case studies to look at the relationship between vulnerability and the contexts which exist for vulnerable adolescents in Brent. <sup>17</sup>

## **Contexts**

19. The 'context' of neighbourhoods will be a considerable area of work in developing contextual safeguarding in Brent. Young people often have a perception of particular areas as risky. The task group heard that some young people may not feel comfortable about travelling through all parts of the borough; there are public spaces such as parks and shopping centres which may not feel safe for some adolescents, and different groups of young people often won't go to particular neighbourhoods.

20. Neighbourhoods for some time have seen a contextual safeguarding approach by the local authority without it being labelled as such. For example, to improve neighbourhoods, Community Protection has been working jointly with the police to develop ongoing initiatives to improve the public realm and tackle issues of anti-social behaviour, crime and tackling safety issues through the Joint Action Groups covering Kilburn, Harlesden and Wembley. Often, this is in response to what residents say about a neighbourhood, and what makes them feel at risk. In the borough's high streets there is an ongoing monitoring for issues of gangs or child sexual exploitation at certain large fast-food restaurants with training offered to staff. There has also been engagement with the owners of smaller takeaway food shops.

21. In the local authority there has been work about how else neighbourhoods can be shaped to make them safer for adolescent children. For example, there has been discussion with town centre managers about how they can contribute, and training.

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<sup>16</sup> Task Group Meetings, 2 and 4

<sup>17</sup> Task Group Meeting 1

Also, as part of the London Borough of Culture 2020 there will be a research project, involving Brent Youth Parliament, Young Ambassadors, Young Brent Foundation (an umbrella organisation for third-sector organisations working with young people), LSE Cities and the developers, Quintain, which will develop a charter for young people in public-private spaces. The charter will make recommendations for development that is welcoming for young people and supports youth culture. <sup>18</sup>

22. One key project has been identifying places of safety for adolescent children. Safe Spaces is looking at how the council and partners can develop a Safe Space in every neighbourhood. This type of approach is not new. London Citizens set up CitySafe in 2008, and CitySafe Havens are identified businesses, schools or public buildings which are a place of safety for those who feel at risk. Across London there are 600 CitySafe Havens, including some in Brent. A separate initiative is led by the Safe Places National Network. In certain neighbourhoods these initiatives are developed. For example, Newman Catholic College has been working with Citizens UK on initiatives to improve the safety of young people in the Harlesden area, including the creation of a Safe Space scheme involving shops in Park Parade and Harlesden High Street. A delegation of pupils from the school addressed a Council meeting last year, calling for funding to light up parts of Roundwood Park.

23. One aspect of neighbourhoods which was cited as an area of concern by different stakeholders was transportation and the transition from school to home. The task group heard that there are issues about the journey home from school. Many young people feel vulnerable, and fear crime. <sup>19</sup> Transport is highlighted by the council as part of its actions around child sexual exploitation. It will be working with British Transport Police and Transport for London (TfL) to assess bus and Tube stations as potential places of vulnerability.

24. The bus network was also highlighted. Schools report having to deal with a large number of children using the bus network after school. At times, children are in uniform but sometimes they don't have an Oyster card and cannot get on a bus which means they end up hanging around in a nearby park. The Independent Chair of Brent LSCB said that there needs to be closer collaboration and more people

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<sup>18</sup> Task group meetings 1, 2

<sup>19</sup> Task Group Meeting 2

taking responsibility for transport provision, and has proposed a workshop or summit which would bring together transportation and bus operators, police and schools.

25. As members we are aware of concerns of residents about many schoolchildren moving around the transportation network, particularly buses, in the after school hours and recognise the concerns and feelings of vulnerability which some young people may have. On that basis, we would like to make a recommendation to the Cabinet.

**Recommendation 1: To support bringing together representatives from Transport for London, bus companies, and employee representatives with schools, further education colleges, the council, and statutory Boards to address concerns about adolescents on the transportation and bus network.**

26. Schools are another important context. Schools are often a place of safety for children, especially when there are significant difficulties at home. Schools often have a strong relationship with the Police's Safer Schools Officers. But there is the issue of what happens to children outside of school hours or term-time. The task group was told that a school-age child can spend as little as 15% of his or her life in school. The task group was told that there can be an issue with 'losing' children over the summer holidays. Some children may even become gang affected at this time.<sup>20</sup> As mentioned, a role for organisations working with young people to develop contextual safeguarding is envisaged. Developing out-of-term activities is one in which these organisations could play an important role. So this area is another recommendation to the Cabinet.

**Recommendation 2: To further support organisations working with young people to promote and develop extra-school activities, particularly in the summer months, for Brent's adolescent children.**

27. While the academic literature refers to schools as a 'context', in Brent there needs to be a greater focus on further education, which the Children and Young People

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<sup>20</sup> Task group meeting 3

department have recognised. The task group was told of the high number of adolescent children in further education. Many of Brent's young people, including vulnerable adolescents, leave school at 16 and go to college. But while schools have Safer Schools Officers, further education colleges do not have that dedicated police resource, and are covered by ward-level policing.<sup>21</sup> The high number of adolescents in further education, and the importance of the borough's further education college means the task group would also like to make this recommendation to the Cabinet.

**Recommendation 3: Brent's approach to contextual safeguarding should specifically develop its work with further education colleges to help address the risks faced by adolescent children in this context.**

28. Peer groups is another context in which work has developed in advance of a formal plan or approach to contextual safeguarding being agreed. For example, Brent Council's Youth Offending Service has developed peer-network mapping to better understand what is going on in the peer groups of the young people it works with. The service has also commissioned organisations to help some of those young people develop a better understanding of positive and negative behaviours in peer groups.<sup>22</sup> Schools support anti-bullying initiatives and the local authority works with schools and young people to organise a cross-borough event for National Anti-Bullying Week.

29. Social media and digital technology influences the contexts of neighbourhoods, schools and peer groups. It can be a positive force. For example, Community Protection is helping the borough to sign up to a new online platform called OWL (Online Watch Link). The platform allows local Neighbourhood Watch coordinators to communicate with residents, and to receive local crime alerts by email or SMS.<sup>23</sup>

30. The task group heard about the issues which social media in particular can cause. Social media is a growing part of the world of the adolescent child, and it's thought that some children are spending a considerable amount of time on social media

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<sup>21</sup> Task group meeting 4

<sup>22</sup> Task Group Meeting 2

<sup>23</sup> [www.owl.co.uk/met/](http://www.owl.co.uk/met/)

outside of school with the rise of social networking through smartphones and online gaming. This technology is not new, but it has grown considerably in popularity.

31. However, the task group also heard about the problems it can cause in schools. Issues can include behavioural problems being made worse in a school because of social media and a resulting increase in vulnerability for some children. Problems can occur because of a child's or a parent's lack of knowledge in using smartphones and their settings. These are issues which many schools are addressing. The task group believes that social media is also a problem for further education colleges as well.

32. Brent Council has developed a Digital Strategy 2017-2020, agreed by Cabinet in 2017, which focuses on enabling the local authority to digitise services, and developing digital technology. The task group is of the view that any new Social Media Strategy should look at how it can help to address issues around social media and being online for Brent's adolescent children. This is another recommendation for the Cabinet.

**Recommendation 4: A future Social Media Strategy should include how the local authority can work in partnership with external organisations or companies to address areas of concern in adolescents using social media and being online which are identified by Brent Council's approach to contextual safeguarding.**

### **Risks**

33. Risks described in the contextual safeguarding model, and referred to in the updated national guidance 'Working Together', are all present in Brent. A significant number of adolescents in Brent face one or more risks. The main focus for Brent's approach is on the issues of gangs, serious youth violence including county lines and child sexual exploitation (CSE). Radicalisation is not a significant priority in terms of scale and the work is done through Prevent, which works on a case-by-case basis.

34. Gang-related activity and county lines has a significant presence within the borough. There is a strong partnership response to keeping young people safe between the police and Children's Services. Gang intervention programmes have been commissioned to work with children and young people on the periphery of gangs, and a gang mentor works with young people through Early Help, including

the Youth Offending Service. The task group heard how gang involvement can start in a low-key way and then build up. There is a higher risk for some young people because they are in a particular environment and then get drawn into it. It can start out with a social dimension. For some young people the gang replicates a family environment. But money draws in young people and by selling drugs they can build up a 'debt' to their own gang.”<sup>24</sup> Knife crime and youth violence is clearly a major issue in the context of schools and neighbourhoods. Stabbings of adolescents do take place, and there have been high-profile incidents. Secondary schools work with their Safer School Officers, who operate screening arches in some schools and run talks about knife crime.<sup>25</sup>

35. However, it should be remembered that while working with contextual safeguarding, there are risks are to children which emerge from within the family and which will still be present. In 2017 Brent Local Safeguarding Children Board commissioned a multi-agency audit on the theme of domestic abuse. That found that Domestic abuse is the most commonly referred concern to Brent Family Front Door, which is a contact point for concerns about children and families in Brent, and incorporates the Multi-Agency Safeguarding Hub (MASH).<sup>26</sup>

## **Community**

36. Brent Council has no additional funding for contextual safeguarding, and its overall expenditure is falling. The council's overall spending has dropped considerably since 2010. On 25 February 2019 Council agreed the 2019/2020 and 2020/2021 Budget. The new Budget cuts the Children and Young People department's expenditure to £40.7million for 2019/2020 excluding the ring-fenced budget for schools, and the overall day-to-day expenditure across all departments, or the General Fund, will fall from £242.2million to £238.6million. Further savings are planned after 2020/2021.<sup>27</sup>

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<sup>24</sup> Task Group Meeting 1

<sup>25</sup> Task Group meeting 3

<sup>26</sup> LSCB Annual Report 2017/18

<sup>27</sup> Proposed Revenue Budget 2019/2020, Budget and Council Tax 2019/2020 and 2020/21



Contextual safeguarding appears not to qualify as what government calls a 'new burden' and activity, including training, will be paid for from the General Fund.<sup>28</sup>

37. Brent's approach envisages community organisations playing a role in supporting contextual safeguarding. This could include supporting extra activities for adolescent children, and working with more young people.<sup>29</sup> While the task group is supportive of this it is mindful that residents' organisations vary in how vocal and active they are. Also, there are many community groups, churches, mosques, temples and other organisations already running activities for the young. The task group would like to see these community organisations supported to help them understand contextual safeguarding and working with adolescents.

38. When it comes to working with the community we are of the view that contextual safeguarding needs to help remind residents and people working on the front line of high street businesses that safeguarding young people is everyone's responsibility as well.<sup>30</sup>

39. While the council's resources are declining, the task group would challenge the Cabinet to see how expenditure can be re-focused or brought together from across departments for a public information campaign, to promote contextual safeguarding and safeguarding adolescents.

**Recommendation 5: To develop a one-off public information campaign working with partner organisations and the community to support the development of contextual safeguarding in Brent.**

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<sup>28</sup> New Burdens Doctrine: Guidance for Departments (Department of Communities and Local Government, 2011) pp.4-5

<sup>29</sup> Task group meeting 1

<sup>30</sup> Task group meeting 3

## **Appendix A**

### **Work Plan and Activities: Contextual Safeguarding Overview and Scrutiny Task Group**

#### **Meeting 1: Overview of Contextual Safeguarding and Children's Social Care**

##### **Themes**

Understanding the contextual safeguarding model

Practice of contextual safeguarding

Role of the Contextual Safeguarding Network

National and local guidance

Existing safeguarding system and multi-agency working

Risks to adolescent children in Brent outside the family e.g. gangs, county lines, extremism and radicalisation

Contextual safeguarding and looked after children

##### **Attendees**

Operational Director Safeguarding, Partnerships and Strategy

Operational Director Integration and Improved Outcomes

Strategic Director Children and Young People

Cabinet Member Safeguarding, Early Help and Social Care

#### **Meeting 2: Implementing Contextual Safeguarding in Brent**

##### **Themes**

Projects to put contextual safeguarding in place

Assessments and an adolescent child's environment

Examples of contextual safeguarding approaches to make public places safer

Mapping risks in public places

Developing knowledge of contextual safeguarding in children's services  
Best practice and learning from other boroughs or nationally  
Governance and working groups in the council  
Role of officers in departments across the council to evaluate risk in public spaces  
Partnerships with transport providers, businesses, fast food restaurants

### **Attendees**

Operational Director Safeguarding, Partnerships and Strategy  
Head of Community Protection  
Head of Early Help  
Head of Planning, Transport and Licensing  
Cabinet Member Children's Safeguarding, Early Help and Social Care

### **Meeting 3: Contextual Safeguarding and Working with the Community**

### **Themes**

Working with the community to identify risks to adolescent children  
Partnership with the Local Safeguarding Children Board; Violence, Vulnerability and Exploitation Priority Group  
The role of parents  
Engaging with schools, educational institutions  
Learning events with the community on particular risks  
Multi-agency working with partners in health and the police  
Particular risks associated with schools, peer groups, the wider community, or online

### **Attendees**

Brent LSCB Independent Chair,  
Senior leadership representatives from Capital City Academy, and Newman Catholic College, Brent River College  
Operational Director Safeguarding, Partnerships and Strategy

## **Meeting 4: Contextual Safeguarding and Brent's Strategic Priorities**

### **Themes**

Budgets for children's services and implementing contextual safeguarding

How contextual safeguarding meets strategic priorities

Commitments in the Borough Plan

Partnership with other local authorities

Partnership with police and other safeguarding partners

Task group recommendations to Cabinet

### **Attendees**

Strategic Director Children and Young People


Cabinet Member Children's Safeguarding, Early Help and Social Care

## **Appendix B**

### **Terms of Reference**

- a) Understand the model of contextual safeguarding and the applicability of its implementation in Brent.
- b) Challenge the council's Cabinet in how they are supporting contextual safeguarding as a cross-cutting local authority initiative and as part of an improvement to children's services.
- c) Review the extent to which contextual safeguarding will help address priorities in the new borough plan.
- d) Understand contextual safeguarding from the perspective of front-line practitioners and those working in children's services.
- e) Understand Brent's particular social demographics and the scale of the risks for adolescent children in Brent.
- f) Develop recommendations for the council's Cabinet which are focused on the development of contextual safeguarding by the council and its partners.

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	<b>Cabinet</b> 17 June 2019
	<b>Report from the Strategic Director,  Children and Young People</b>
<b>Formal Consultation on the School Organisation  Arrangements of Roe Green Infant School</b>	

<b>Wards Affected:</b>	Queensbury, Fryent, Welsh Harp, Kenton, Northwick Park, Preston, Barnhill
<b>Key or Non-Key Decision:</b>	Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>No. of Appendices:</b>	Three <ul style="list-style-type: none"> <li>• Appendix A: Consultation document on Change of Character of Roe Green Infant School (Strathcona site)</li> <li>• Appendix B: Summary of Informal Consultation Responses</li> <li>• Appendix C: Equality Impact Assessment</li> </ul>
<b>Background Papers:</b>	N/A
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	Brian Grady, Operational Director Safeguarding, Partnerships and Strategy 020 8937 4122 <a href="mailto:Brian.Grady@brent.gov.uk">Brian.Grady@brent.gov.uk</a>

## 1.0 Purpose of the Report

- 1.1 This report provides Cabinet with a summary of the informal consultation undertaken between 20 March 2019 and 7 May 2019 on a change in the age range of Roe Green Infant School and the closure of primary provision on the Roe Green Strathcona site from September 2020.
- 1.2 The report recommends a move to formal consultation, through publication of a statutory notice, on a change in the age range of Roe Green Infant School from 3-11 to 3-7, a reduction in the school's Published Admission Number (PAN) from 150 to 120 and a phased closure of provision on the Roe Green Strathcona site. In response to concerns raised during informal consultation and to minimise the impact on children attending the Strathcona site, a phased closure of the provision is proposed such that no new admissions would be made into any Reception cohort from September 2020 and the school would be fully closed at the end of July 2022. This would allow all children on the

school roll in 2019/20 to remain at the school for 3 years and allow the majority to complete their current key stage before the provision was closed.

## **2.0 Recommendation(s)**

That Cabinet:

2.1 Approves a period of formal consultation, through publication of a statutory notice, on proposals to:

- change the age range of Roe Green Infant School from 3-11 to 3-7
- reduce the school's Published Admission Number (PAN) from 150 to 120 for September 2020
- implement a phased closure of the provision on the Roe Green Infant School Strathcona site.

## **3.0 Detail**

3.1 The Brent School Place Planning Strategy 2014-18 approved by Cabinet in October 2014, identified an increasing demand for primary school places and the need for additional places across the borough. To help meet this demand, new primary provision was established in 2014 under the management of Roe Green Infant School on a separate site known as the Roe Green Strathcona site.

3.2 Since 2017, there has been a reduction in the number of children applying for primary school places in the borough and forecasts indicate that this trend will continue for the next few years. As detailed in the Brent School Place Planning Strategy 2019-23, agreed by Cabinet in November 2018, the January 2018 Greater London Authority (GLA) projections for the 2018/19 academic year are 12% lower than in January 2014, when provision on the Strathcona site was opened. This is partly due to revised ONS population and migration data, but also due to falling birth rates across London.

3.3 The School Place Planning Strategy 2019-23 shows that demand for primary places across the borough is expected to reduce until 2022 when a small increase in demand is forecast. There is currently a high level of spare places in Reception across the borough (around 15%), that will increase unless there is a reduction in capacity. Spare places are not evenly distributed across schools and some schools will feel the impact of the reduced primary population more than others.

3.4 Within this context, on 11<sup>th</sup> March 2019, Cabinet was informed of the intention to undertake informal consultation on the future of provision on the Roe Green Strathcona site in response to falling demand for places at the school.

3.5 Roe Green Infant School is situated in Planning Area 1 in the north of the borough, which covers the Queensbury, Fryent and Welsh Harp wards and is close to the Barnet and Harrow borders. The Roe Green Strathcona site is situated in Wembley in Planning Area 2 and covers the Kenton, Northwick Park, Preston and Barnhill wards.

3.6 The Roe Green Strathcona provision was initially opened as temporary provision for 210 places in total, 30 in each year group from Reception to Year



6. Pupils were first admitted to the provision in March 2014 into Reception and Year 2 classes. A statutory process to regularise the provision was

implemented in September 2016. This changed the legal nature of Roe Green Infant School by permanently establishing the provision on the Strathcona site:

- the age range of the school changed from ages 3-7 to 3-11 (including the nursery)
- the total number of permanent places in Reception to Year 6 was changed from 360 to 570, with infant provision for 360 pupils on the school's Princes Avenue site alongside a nursery for 40 full-time equivalent places, and 210 places in years Reception to Year 6 on the Strathcona site.

- 3.7 For the purposes of admissions, when applying for a place at Roe Green Infant School, parents can make a preference for either the Roe Green Infant School Princes Avenue site or the Strathcona Road site. In January 2019 (school census) there were 557 pupils on roll at Roe Green Infant School, of whom 110 were on the Roe Green Strathcona site (Reception to Year 6). There are only 7 pupils in Reception on the Roe Green Strathcona site and all year groups, other than Year 5, have significantly lower numbers than 30. Applications for Reception places on the Strathcona site for September 2019 were also low, with only 6 offers made on national offer day (16 April 2019). The number has since reduced to 5 pupils for the Reception year group in September 2019.

**Table 1: Numbers on roll at Roe Green Strathcona Road site**

Year	Rec	Y1	Y2	Y3	Y4	Y5	Y6	Total
<b>2014/15</b>	34	59	14	28	-	-	-	<b>135</b>
<b>2015/16</b>	15	30	55	9	28	-	-	<b>137</b>
<b>2016/17</b>	16	19	26	49	6	27	-	<b>143</b>
<b>2017/18</b>	7	14	11	22	42	3	22	<b>121</b>
<b>2018/19</b>	7	8	16	12	20	44	3	<b>110</b>
<b>2019/20</b>	5	7	8	16	12	20	44	<b>112</b>
<b>2020/21</b>	7	5	7	8	16	12	20	<b>75</b>
<b>2021/22</b>	7	7	5	7	8	16	12	<b>62</b>

Source: 2014-2017/18 from January school census; 2018/19 from admissions database in January 2018; other data are forecasts.

- 3.8 Roe Green Infant School operates as one school with the leadership team and staff working across both sites. On the Strathcona site, the school currently organises pupils in some year groups into mixed age classes with one class for Reception/Year 1 and two Year 5/6 classes. Pupils in Key Stage 1 based at the Strathcona site travel to the main school site for some shared teaching. The school achieves good outcomes for pupils across both sites and was rated by Ofsted as 'Good' in November 2017.
- 3.9 Several other high quality schools in the area served by the Roe Green Strathcona site were expanded to meet projected demand. This includes Byron Court Primary School, Preston Park Primary School, Uxendon Manor Primary School and East Lane Primary School. On National Offer Day, only two schools in Primary Planning Area 2 filled to their planned capacity for September 2019. Table 2 provides the number of pupils on roll at schools within the local area. All of these schools are considered to be viable alternatives for families who need a primary school place in the area served by Roe Green Strathcona. Table

3 provides forecasts for Primary Planning Area 2, within which Roe Green Strathcona site is located.

**Table 2: Number of children and places in all schools within the local area**

<b>Planning Area 2 Schools</b>	<b>PAN</b>	<b>Rec</b>	<b>Y1</b>	<b>Y2</b>	<b>Y3</b>	<b>Y4</b>	<b>Y5</b>	<b>Y6</b>	<b>Total</b>
Byron Court Primary School	<b>150</b>	96	106	115	82	128	89	118	734
Mount Stewart Infant School	<b>90</b>	84	89	85	-	-	-	-	258
Mount Stewart Junior School	-	-	-	-	91	86	89	116	382
Preston Manor School	<b>60</b>	60	60	60	61	60	60	60	421
Preston Park Primary School	<b>120</b>	76	84	109	103	106	86	132	696
Strathcona site of Roe Green Infant School	<b>30</b>	7	8	16	12	20	44	3	110
Sinai Jewish Primary School	<b>90</b>	75	51	75	88	90	90	90	559
Uxendon Manor Primary School	<b>120</b>	93	70	99	96	85	59	61	563
Wembley Primary School	<b>120</b>	115	116	120	119	118	118	120	826
<b>Total</b>	<b>780</b>	606	584	679	652	693	635	700	4549
<b>Planning Area 3 schools near the Strathcona site of Roe Green Infant School</b>									
Ark Academy	<b>60</b>	59	60	59	58	60	59	48	403
Chalkhill Primary School	<b>60</b>	60	59	60	60	58	59	87	443
East Lane Primary School	<b>120</b>	90	85	78	55	30		25	363
Sudbury Primary School	<b>120</b>	121	124	120	118	120	121	122	846
<b>Total</b>	<b>360</b>	330	328	317	291	268	239	282	2055

Source: January 2019 school census

**Table 3: Planning Area 2 Forecasts and projected surplus of places**

<b>Planning Area 2</b>		<b>Rec</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Year 4</b>	<b>Year 5</b>	<b>Year 6</b>
2018/2019	Capacity	780	720	750	720	750	660	750
	Projections	653	565	672	680	692	621	693
	<b>surplus/deficit</b>	<b>127</b>	<b>155</b>	<b>78</b>	<b>40</b>	<b>58</b>	<b>39</b>	<b>57</b>
2019/2020	Capacity	780	780	720	780	720	750	660
	Projections	650	638	553	687	673	680	609
	<b>surplus/deficit</b>	<b>130</b>	<b>142</b>	<b>167</b>	<b>93</b>	<b>47</b>	<b>70</b>	<b>51</b>
2020/2021	Capacity	780	780	780	720	780	720	750
	Projections	657	635	625	566	678	659	667
	<b>surplus/deficit</b>	<b>123</b>	<b>145</b>	<b>155</b>	<b>154</b>	<b>102</b>	<b>61</b>	<b>83</b>
2021/2022	Capacity	780	780	780	780	720	780	720
	Projections	645	644	624	640	561	662	649
	<b>surplus/deficit</b>	<b>135</b>	<b>136</b>	<b>156</b>	<b>140</b>	<b>159</b>	<b>118</b>	<b>71</b>
2022/2023	Capacity	780	780	780	780	780	720	780
	Projections	653	638	635	642	637	550	655
	<b>surplus/deficit</b>	<b>127</b>	<b>142</b>	<b>145</b>	<b>138</b>	<b>143</b>	<b>170</b>	<b>125</b>
2023/2024	Capacity	780	780	780	780	780	780	720
	Projections	663	647	629	652	639	624	543
	<b>surplus/deficit</b>	<b>117</b>	<b>133</b>	<b>151</b>	<b>128</b>	<b>141</b>	<b>156</b>	<b>177</b>

- 3.10 In the context of current and predicted demand, the level of preference expressed for Roe Green Strathcona over the past four years and the number of places available at other local schools, primary provision on the Roe Green Strathcona site is not considered to be sustainable. Forecast Reception intakes indicate that there will be fewer than 100 pupils on site from September 2020. Managing a split site school when pupil numbers are falling is a challenge and this is likely to become harder as pupil numbers reduce further.
- 3.11 The council has a responsibility to ensure that the Dedicated Schools Grant is deployed to support all pupils efficiently. Roe Green Infant School currently receives higher than average per pupil funding for pupils on the Strathcona site due to the low number of pupils accessing the provision. This difference will increase further if the number of pupils continues to decline (see Section 7).

#### **4.0 Outcomes from the informal consultation**

- 4.1 Informal consultation was carried out between 20 March 2019 and 7 May 2019. All applicable statutory requirements to consult in relation to these proposals have been complied with.
- 4.2 An informal consultation document (Appendix A) was distributed that outlined the proposals and relevant background information to stakeholders. This included all parents and carers with children at Roe Green Infant School, the Governing Board and staff, nearby schools and other stakeholders. The document was also posted on Brent's website.
- 4.3 Four consultation meetings were held that provided staff, governors, the public and other stakeholders the opportunity to ask questions and comment on the proposals. Meetings with staff and governors were held on 2 April 2019 at Roe Green Infant School Princes Avenue site and two public meetings were held in the morning and early evening of 4 April 2019 at the Strathcona site.
- 4.4 The consultation document included a consultation reply slip which could be returned to the Local Authority by post, e-mail or through the online consultation portal. A summary of issues raised through the consultation replies and consultation meetings, as well as the response from the Local Authority, are included as Appendix B.
- 4.5 A total of 463 written responses have been received, with the majority identifying themselves as parents, staff or governors. A petition was also received that had 396 signatories, that asked for an independent inquiry into concerns about the proposals.
- 4.6 The majority of responses received were opposed to the proposal to cease provision on the Roe Green Strathcona site:

**Table 4: Summary of Written Responses**

Views on proposal to cease provision on Strathcona site	Number of responses received	Percentage of response overall
Agree with proposal	3	0.6%
Disagree with proposal	460	99.4%
Unclear	0	0%
<b>Total responses</b>	<b>463</b>	<b>100</b>

4.7 During the informal consultation meetings and in written responses, a number of key concerns were raised in relation to:

- school place planning and the need for the provision
- promotion of the provision on the Strathcona site
- the quality of education provided by the school and
- the impact of closure of provision on the Strathcona site on pupils and staff.

#### 4.8 **School Place Planning**

4.8.1 During the consultation, a number of questions were raised about the accuracy of pupil projections and the quality of pupil place planning in Brent. The decision to make the provision permanent was questioned and it was suggested that Brent had failed to adequately understand demographic trends at the time this decision was taken, as numbers had already started to plateau. Questions were raised about whether the council reviewed the impact on the Strathcona site when decisions were taken to expand other schools.

4.8.2 Respondents questioned why the council was proposing to close the provision if it had only been made permanent in 2016 and why an approach had not been taken to consider action related to other schools in the area.

4.8.3 **Response:** The local authority relies on projections provided by the Greater London Authority (GLA) to inform school place planning. GLA projections are informed by national data inputs such as census data and birth rates together with locally held information on migration patterns and planned housing growth. Pupil projection figures are a good indicator of need, rather than a definitive position, and are updated annually to reflect changes in underlying data. At the time the Strathcona Site of Roe Green Infant School was opened and when other schools were expanded, there was anticipated demand for the planned places. However, Reception intakes have since reduced and the most recent projections provided by the GLA indicate further reductions in demand over the next few years. This is the case across London as well as in Brent.

4.8.4 On National Offer Day (16 April 2019) for Reception places in 2019, 30 of the 57 Brent schools that offer places in Reception had vacancies. The local authority has consulted to reduce the Published Admission Number at two schools which will take effect from September 2020 and is working with other primary schools that will have more than 30 vacancies in 2019 to implement an informal cap to the numbers entering the school. The local authority has proposed the closure of the Strathcona provision at Roe Green Infant School as part of wider measures to reduce available capacity across the borough.

#### 4.9 **Promotion of the school**

4.9.1 Respondents said that Brent had failed to market the school and that as the Strathcona site is not listed on the Brent 'School Finder', parents in the Wembley area were not aware it existed and would not, therefore, make a preference for the Strathcona site. Concern was raised that the Roe Green Strathcona site does not have a catchment area like other schools in Brent. The leadership of the school said that it had contacted the LA on several occasions to raise concerns about the school not being marketed in the same way as other schools. The lack of advertising was considered by the school the reason why

the school had low intakes and it was suggested that if this was rectified, there would be sufficient pupils for the provision to be sustainable. The Governing Board responded that it would find a proposed closure more palatable had the school had an extended period of time where it was marketed properly in the admissions booklet, in line with other schools.

4.9.2 **Response:** The local authority notes that the Strathcona provision cannot be found on the School Finder pages of the Brent website. As the Strathcona provision is a part of Roe Green Infant School and is not a separate school, in itself, the school has only one entry on the 'Get Information About Schools' website run by the Department for Education (DfE) and it only has had only one DfE number following the statutory process to make the provision permanent. The provision does, however, have a separate entry on the eAdmissions website for applications for children starting in Reception and can be found using the Admissions system map search and on the preference drop-down menu list. The provision also appears on Brent Council's Parent Portal and drop-down menu for children who require an in-year school place. The school site also appears on other search engine maps. Brent catchment areas were last reviewed in 2012 before the establishment of the Roe Green Strathcona provision and the expansion of other schools across the authority. The purpose of catchment areas is to ensure that parents can access a school place and this could encourage parents to preference a particular school. However, not all schools operate an admissions policy that includes a catchment area.

4.9.3 The Strathcona provision has been included in the local authority's Primary School Information Booklet each year since 2016. The introduction of the Community School pages explains the uniqueness of Roe Green Infant School and how applications can be made for children to attend either of the school's two sites.

4.9.4 The local authority is not responsible for marketing individual schools and does not take any additional measures to individually promote any school above another. Even if more time was given for the school to market the Strathcona site, there are currently significantly fewer primary applications than available places across the school estate. There is no evidence that intakes would increase.

#### 4.10 **The quality of education and school budgets**

4.10.1 Parents questioned why the council was proposing closing a school that provides a high quality of education, evidenced by progress results that rank the school in the top 3% in England. Parents fed back that the school provides an inclusive environment that helps all children thrive and that the staff provide outstanding support to their pupils.

4.10.2 Many parent respondents stated that they felt the fact that Roe Green Strathcona site is a small school is a strength – many children join the school in-year rather than at Reception and being in a small school helps them to settle into education, in particular those who do not speak English or who have special educational needs.

4.10.3 The Governing Board has stated that other small schools in Brent receive a similar level of funding and that value for money should be linked to outcomes rather than expenditure.

- 4.10.4 **Response:** Roe Green Infant School is a good school. The proposal to cease provision on the Strathcona site is being driven by demographic demand, not the quality of provision.
- 4.10.5 Based on the historically low number of children entering the Strathcona provision at Reception, it would become very difficult to manage Key Stage 2 provision with only around 7 children in each year group. With 96% of schools in Brent rated as either good or outstanding by Ofsted and schools ranging from 1 form of entry to 5 forms of entry in size, there are many schools that would provide suitable alternatives for families.
- 4.10.6 The local authority is responsible for ensuring that the Dedicated Schools Grant is used effectively to provide a good education for all pupils. If pupil numbers continue to reduce on the Roe Green Strathcona site, the cost of provision on the site will increase. In the longer term this could impact on the quality of provision for pupils at Roe Green Infant School, as funding reduces and fixed cost expenditure remains stable.
- 4.11 **Impact of the proposals**
- 4.11.1 During the consultation, concerns were raised about the potential disruption to pupils' education if they have to move schools, in particular KS2 pupils, who may need to move to another primary school and then onto secondary school within a couple of years.
- 4.11.2 Concerns were raised about the impact of the consultation on the mental health and wellbeing of pupils who are anxious about their school closing and about the impact on their teachers and friends.
- 4.11.3 A number of concerns were raised about the impact of the proposal on staff at Roe Green Infant School, noting that the proposal impacts on staff at both the Princes Avenue and Strathcona sites. The concern was that the proposal, therefore, impacts on families across the whole school. Concerns include low staff morale, an impact on finances and potential redundancies that could impact on pupil outcomes.
- 4.11.4 **Response:** The council recognises that any closure proposal will create a climate of uncertainty for all staff and families served by both sites of Roe Green Infant School. If the proposal is taken forward, then implementation will aim to minimise the direct impact on children currently attending the Strathcona site through a phased closure. No new admissions would be made into any Reception cohort from September 2020 and the site would fully be closed at the end of the 2021/22 academic year. This would allow all children in the Strathcona site provision in September 2019, other than those in Year 3, to complete their current key stage before the provision is closed. All children would be able to remain in the provision for three years. (See Section 6 for further details). The local authority would facilitate any transitions that may be required for pupils on roll at the end of July 2022, although parents would also be free to move their children at any time to another school with vacancies.
- 4.11.5 The council recognises that as Roe Green Infant school is one school operating from two sites, staff work across the two sites and that the impact of this proposal will affect the whole school. Any staff redundancies would be managed

in line with established procedures. The local authority would work with Roe Green Infant School, other schools and unions to minimise the impact of redundancies and to maximise the availability of redeployment options should the proposal proceed.

- 4.12 While the consultation has highlighted a number of issues that need to be taken into consideration, there is no evidence that there will be sufficient demand for the provision to be sustainable in the longer term. Officers are, therefore, of the view that the council should move to consult formally on the proposal to cease provision on the Roe Green Infant School Strathcona site.

## 5.0 Formal Consultation

- 5.1 Formal consultation to change the provision is required under the statutory process for making 'prescribed alterations' to maintained schools (Statutory Guidance for Proposers and Decision-makers, Department for Education, October 2018). As the admission authority for the school, the local authority would lead this process. The statutory consultation process for significant changes to school provision has four stages - Stage 1 Publication of a Statutory Notice, Stage 2 Representation (formal consultation for a period of 4 weeks), Stage 3 Decision and Stage 4 Implementation.
- 5.2 Following the formal representation period, Cabinet is required to make a decision on this proposal within two months. The anticipated milestone dates following a decision by the Cabinet to approve the formal consultation to alter the character of Roe Green Infant School are set out in the timetable below:

**Table 5: Project milestones**

Date	Action
20 June 2019	Publication of statutory proposal notice and formal consultation
19 July 2019	Formal consultation closes
9 September 2019	Final decision by Cabinet
1 September 2020	Phased closure commences with no intakes into Reception
31 July 2022	Strathcona site closes. All pupils on roll at the time of closure would move to other schools in September 2022.

## 6.0 Details of the Statutory Notice

- 6.1 The consultation sought views from stakeholders on how the provision on the Strathcona site should cease if a decision was taken to proceed to formal consultation on the proposal. There are several ways that this could be implemented:
- Closing provision on the Strathcona site from 1<sup>st</sup> September 2020, with all pupils being relocated.
  - A phased closure with all existing pupils remaining at the school until they reach Year 6, with no additional cohorts joining the school from September 2020.
  - Allowing only some year groups to remain at the school to the end of Year 6.
- 6.2 Of the respondents that provided a view on how the provision should close, the majority favoured a phased closure (see Appendix B). Parents wanted their

children to complete their primary education on the Roe Green Strathcona site. Officers are of the view, however, that if all children on roll in 2019/20 remained at the school until the end of Year 6, this could potentially lead to the site operating with fewer than 10 pupils in one year group, while still requiring support staff, including staff in statutory roles. This would not be an efficient use of the DSG. This could also be detrimental to the quality of education for each child and would be likely to lead to difficulties with the retention of staff.

- 6.3 Officers propose a phased closure is taken forward with no intakes into Reception to the Strathcona site from September 2020 and provision ceasing at the end of the academic year 2021/22. This would allow all pupils to remain at the school effectively for three academic years from the date of any decision to close the site. Pupils in Reception, Year 1 and Year 2 in 2019/20 would all complete Key Stage 1 at the school, with the Reception cohort moving to other schools at the end of Year 2 in line with pupils on the Roe Green Infant School main site, for whom this is considered a normal point of transfer. Pupils in years 4, 5 and 6 in 2019/20 would be able to complete Key Stage 2 on the Roe Green Strathcona site. The only Key Stage 2 pupils that would not be able to complete their primary education on the Roe Green Strathcona site would be those in Year 3 in 2019/20.
- 6.4 The recommended proposal assures, as far as possible, that the site can continue to operate with more than one class until the proposed closure date. Table 6 indicates the projected number of children on roll in each year group up to a proposed closure in July 2022.

**Table 6: Number of children on roll with a phased closure to 2021/22**

<b>Year</b>	<b>Rec</b>	<b>Y1</b>	<b>Y2</b>	<b>Y3</b>	<b>Y4</b>	<b>Y5</b>	<b>Y6</b>	<b>Total</b>
<b>2019/20</b>	5	7	8	16	12	20	44	<b>112</b>
<b>2020/21</b>	-	5	7	8	16	12	20	<b>68</b>
<b>2021/22</b>	-	-	5	7	8	16	12	<b>48</b>

- 6.5 A statutory notice would be published to commence the formal consultation process. In summary, Cabinet is recommended to approve formal consultation on:
- a change in the legal age range at Roe Green Infant School from 3 – 11 years to 3 – 7 years, to take effect from 1 September 2022
  - that no children should be admitted to the Strathcona site to a year group that has been closed in Key Stage 1. This would be the Reception year group in 2020/21 and the Reception and Year 1 year groups in 2021/22.
  - to approve the full closure of the Strathcona site of Roe Green Infant School on 31 July 2022.
- 6.6 As Cabinet has determined admissions arrangements for 2020/21 (in January 2019 in line with statutory requirements), it would be necessary to seek a variation to the admission arrangements for 2020 from the Schools Adjudicator to implement the reduction of the school's published admission number.



- 6.7 If approved by Cabinet, the statutory notice would be published in the Brent and Kilburn Times, on the Brent website, and notices would also be displayed on the school gate at both sites (Princes Avenue and Strathcona Road).

## **7.0 Financial Implications**

- 7.1 The Strathcona site is supported by the local funding formula. The school receives approximately £5,045 per pupil funding plus a split site allocation of £200k. With 110 pupils this totals £755k of funding that Roe Green Infant School receives to deliver school places at the Strathcona site. This sum will reduce as the number of pupils reduces and could require decisions, such as more classes comprising two or more year groups, to resource education provision at the site. The school had reserves of £260k as of 1<sup>st</sup> April 2019.
- 7.2 Funding is provided by the Dedicated Schools Grant (DSG), and equates to nearly £6,300 per pupil for children at this site. This compares to an average of £5,100 per primary pupil across the borough. Given that there are spaces in other schools, the closure of the site will lead to more efficient use of DSG.

## **8.0 Legal Implications**

- 8.1 The authority has the power to consider and determine proposals published under Section 19 of The Education and Inspections Act 2006, pursuant to Section 21 (2) (f) of the Act and in accordance with Schedule 3 paragraph 3 of The School Organisation Regulations 2013.
- 8.2 Under sections 13 and 14 of The Education Act 1996, as amended by The Education and Inspections Act 2006, a local education authority has a general statutory duty to ensure that there are sufficient school places available to meet the needs of the population in its area. The local authority must promote high educational standards, ensure fair access to educational opportunity and promote the fulfilment of every child's educational potential. They must also ensure that there are sufficient schools in their area and promote diversity and increase parental choice. To discharge this duty, the LA has to undertake a planning function to ensure that the supply of school places balances the demand for them.
- 8.3 If the proposals which form the basis of the proposed formal consultation were eventually to be implemented, then this would have the potential effect of the need to consider redundancies for staff.

## **9.0 Equality Implications**

- 9.1 The Public Sector Equality Duty under section 149 of the Equality Act 2010 requires the Local Authority when exercising its functions to have due regard to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, to advance equality of opportunity and foster good relations between those who have a protected characteristic and those who do not share that protected characteristic. The protected characteristics covered under the Act are age, disability, gender reassignment, marriage and civil partnership (only in respect of eliminating unlawful discrimination) pregnancy and maternity, race (this includes ethnic or national origins, colour or nationality) religion or belief (this includes lack of belief) sex and sexual orientation. Due regard means giving relevant and proportionate consideration

to the duty, in that whenever significant decisions are being made consideration must be given to the impact/affect that implementing a particular decision will have in relation to equality before making that decision. Brent Council also has a policy of considering Human Rights and socio-economic impact.

- 9.2 An Equality Impact Assessment has been carried out on the proposals set out in this report and is attached at Appendix C to this report. It is not anticipated that there will be any negative impact from these proposals on the basis of disability, gender reassignment, marriage and civil partnership (only in respect of eliminating unlawful discrimination) pregnancy and maternity, race (this includes ethnic or national origins, colour or nationality) religion or belief (this includes lack of belief) sex and sexual orientation.
- 9.3 Pupil-level data suggest that the intake at the Roe Green Strathcona site is similar to other schools in terms of ethnic diversity, children on free school meals and the number of children with special needs and disabilities (SEND). If as a result of this proposal children move school, this could have a negative impact on individual children. However, based on current information other local schools would provide a suitable alternative and would support children to settle.

## **10.0 Consultation with Ward Members and Stakeholders**

- 10.1 The proposal to undertake informal consultation was discussed with the ward members where the two school sites are located on 15 February 2019 (Queensbury and Preston wards). Further discussion on potential formal consultation was held with these ward members on 10 May 2019. Members of other wards were consulted as part of the informal consultation process.
- 10.2 Other stakeholders were consulted with as set out in Section 4 and paragraph 6.1. Union representatives were informed of the consultation on the proposals at the Teachers Panel on 26<sup>th</sup> March 2019.
- 10.3 Publication of the Statutory Notice and Representation (formal consultation) will be carried out in accordance with *The School Organisation (Prescribed Alterations to Maintained Schools (England) Regulations 2013*.

## **11.0 Human Resources/Property Implications**

- 11.1 The proposals, if implemented, are likely to impact on the required staffing for Roe Green Infant School; the proposal would lead to a reduction in overall staffing levels which would, therefore, result in the possibility for the need to consider redundancies. The number of staff affected would depend on the nature of a phased closure. The school, supported by the local authority, would need to follow the Managing Change in Schools policy and procedure including consultation with affected staff and trade unions to effect the changes in due course.
- 11.2 Should a decision be made to close the Strathcona site then the building and site will become surplus to requirements for the primary school. At that time the Council will review its priorities and potential future uses for the site, which could include educational use.

### **Related documents:**

- Cabinet Report of 11<sup>th</sup> March 2019 - Informal Consultation on the School Organisation Arrangements of Roe Green Infant School;
- Brent School Place Planning Strategy 2019-23

**Report sign off:**

**GAIL TOLLEY**

Strategic Director, Children and  
Young People

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**Consultation on Change of Character of  
Roe Green Infant School from September 2020**



**A Public Consultation**

**Proposed Change of Character of  
Roe Green Infant School from September 2020**

**(Consultation period: 20 March to 07 May 2019)**

**For further information please attend one of the consultation meetings  
being held in April 2019**

Consultation meeting for staff	2 April 2019 at 4.00 – 5.00 pm
Consultation meeting for school governors	2 April 2019 at 5.30 – 6.30 pm

Location:

Roe Green Infant School, Princes Avenue, Kingsbury, London, NW9 9JL

Public meetings for parents/other interested parties	4 April 2019 at 9.00 – 10.30 am
	4 April 2019 at 5.00 – 6.30 pm

Location:

Strathcona site of Roe Green Infant School, Strathcona Road, Wembley, HA9 8QL

## Consultation on Change of Character of Roe Green Infant School from September 2020

1.

### **The proposal**

Brent Council is proposing the closure of the Strathcona site of Roe Green Infant School. The council is seeking the views of interested parties through this informal consultation on proposals to:

- change the age-range of Roe Green Infant School from 4-11 to 4-7
- reduce the school's Published Admission Number (PAN) from 150 to 120 for September 2020
- implement closure of provision on the Strathcona site of Roe Green Infant School. The proposal is that no children will start in Reception at the school in September 2020. All other year groups could either be relocated to other schools in the area or remain on the site.

With these changes Roe Green Infant School would revert back to the status it had in 2015 - an infant school with 120 pupils (4 forms of entry) in Reception to Year 2.

- **No changes are proposed for the Princes Avenue site.** The Princes Avenue site (NW9 9JL) will continue to have a nursery for 40 full time equivalent places, and Reception to Year 2 provision that admits up to 120 pupils each year into Reception. This is the provision that already exists on the site. Children will continue to apply to other schools for their Year 3 to Year 6 education.
- The Strathcona site of Roe Green Infant School (HA9 8QL) currently has provision for children in Reception to Year 6, with up to 30 children admitted each year into Reception. It is proposed to close provision on the Strathcona site from September 2020.

This informal consultation provides an opportunity for discussion with governors, staff, parents and the public about the issues that need to be considered in relation to this proposal.

If, following informal consultation, officers remain of the view that the proposals should be progressed, Cabinet will be asked for approval to undertake formal consultation through publishing a statutory notice. A statutory notice would then be published allowing for formal representations on the proposals for a period of four weeks from the date of publication. The statutory notice must contain sufficient information for interested parties to make a decision on whether to support or challenge the proposed changes. Following formal consultation, Cabinet would be asked to make a final decision on the proposals.

## Consultation on Change of Character of Roe Green Infant School from September 2020

### 2. Background and rationale

This proposal is in response to falling demand for primary schools and increasing spare places across Brent, as identified in the 2019-23 School Place Planning Strategy, approved by Cabinet in November 2018.

Roe Green Infant School is situated in the north of the borough. Following discussions with schools in Autumn 2013 about the urgent need for more school places to meet unanticipated demand, the Governing Body of Roe Green Infant School agreed to expand on a temporary basis in March 2014 on a site in Wembley known as the Roe Green Strathcona Site. The provision was for 210 places in total, 30 in each year group from Reception to Year 6. In order to do this, the age range of the school had to change from 4 – 7 years old to 4 – 11 years old. Following Department for Education regulations this arrangement became permanent from 2016.

Many other schools in the borough also expanded on a permanent basis to meet an anticipated increase in demand for school places, based on projections from the Greater London Authority (GLA) used for school place planning. However, demand for Reception places in the borough started to reduce in September 2017 and the latest GLA projections indicate that this trend will continue. As a result, there are now many spare places in primary schools across the borough. This pattern of reducing primary demand is consistent with many other London boroughs.

Currently there are 117 pupils on roll at the Strathcona site of Roe Green Infant School, with only 6 pupils admitted into Reception in September 2018 (and one additional pupil since) and 14 pupils in September 2017. Other than Year 5, all other year groups currently have significantly lower numbers than the school's Published Admission Number (PAN) of 30. Some year groups are currently taught as mixed age classes due to low pupil numbers.

Applications for Reception places in September 2019 are also lower than the PAN of 30 with only 6 first preferences for the school. The number on roll will be lower than 100 from September 2020 onwards if larger cohorts leaving the school in Year 6 are not replaced by a similar number in Reception.

#### Numbers on roll at the Strathcona site of Roe Green Infant School

Year	Rec	Y1	Y2	Y3	Y4	Y5	Y6	Total
<b>2014/15</b>	34	59	14	28	-	-	-	<b>135</b>
<b>2015/16</b>	15	30	55	9	28	-	-	<b>137</b>
<b>2016/17</b>	16	19	26	49	6	27	-	<b>143</b>
<b>2017/18</b>	7	14	11	22	42	3	22	<b>121</b>
<b>2018/19</b>	7	8	17	18	20	44	3	<b>117</b>

## Consultation on Change of Character of Roe Green Infant School from September 2020

### Predicted numbers on roll at the Strathcona site of Roe Green Infant School

Year	Rec	Y1	Y2	Y3	Y4	Y5	Y6	Total
<b>2019/20</b>	7	7	8	17	18	20	44	<b>121</b>
<b>2020/21</b>	7	7	7	8	17	18	20	<b>84</b>
<b>2021/22</b>	7	7	7	7	8	17	18	<b>71</b>

The low number of pupils provides a significant budget challenge. Roe Green Infant School currently receives an additional £200k allowance each year for running a school on split sites. However, as school budgets are driven by pupil numbers, a declining school roll will make it increasingly difficult to manage.

The Strathcona site provision is located in Brent Council's Primary Planning Area 2, and the most recent GLA forecasts show an ongoing surplus of places in the area for the next 5 years. There are currently over 120 spare Reception places in schools within the planning area (16% of capacity) – the equivalent of four classes of 30 pupils.

### Reception forecasts for Planning Area 2

Planning Area 2		Rec
2018/2019	Capacity	780
	Projections	653
	<b>Surplus</b>	<b>127</b>
2019/2020	Capacity	780
	Projections	650
	<b>Surplus</b>	<b>130</b>
2020/2021	Capacity	780
	Projections	657
	<b>Surplus</b>	<b>123</b>
2021/2022	Capacity	780
	Projections	645
	<b>Surplus</b>	<b>135</b>
2022/2023	Capacity	780
	Projections	653
	<b>Surplus</b>	<b>127</b>
2023/2024	Capacity	780
	Projections	663
	<b>Surplus</b>	<b>117</b>



## Consultation on Change of Character of Roe Green Infant School from September 2020

This proposal is due to falling pupil demand. It is not about the quality of provision at Roe Green Infant School – pupils at the school make good progress and Ofsted graded the school as ‘good’ in November 2017.

There are, however, other high quality schools in the area served by the Strathcona site of Roe Green Infant School that have capacity to provide for local children. This includes Byron Court Primary School, Preston Park Primary School, Uxendon Manor Primary School and East Lane Primary School.

Only one school in Planning Area 2 is expected to fill to planned capacity in September 2019; all other schools are considered to be viable alternatives for families that might be served by the Strathcona site provision. Analysis shows that of the 184 pupils living within 0.5 miles of the Strathcona site who were offered Reception places for September 2018, 41 were offered a place at Preston Park Primary School, 36 at Wembley Primary School, 33 at East Lane Primary School and 31 at Byron Court Primary School.

### Number of children and places in all schools within the local area

<b>Planning Area 2 Schools</b>	<b>PAN</b>	<b>Rec</b>	<b>Y1</b>	<b>Y2</b>	<b>Y3</b>	<b>Y4</b>	<b>Y5</b>	<b>Y6</b>	<b>Total</b>
Byron Court Primary School	150	101	120	89	134	88	120	89	741
Mount Stewart Infant School	90	90	87	89	-	-	-	-	266
Mount Stewart Junior School	-	-	-	-	83	89	119	90	381
Preston Park Primary School	120	83	118	114	113	89	137	90	744
Strathcona site of Roe Green Infant School	30	7	8	17	18	20	44	3	117
Sinai Jewish Primary School	90	48	71	86	90	90	89	89	563
Uxendon Manor Primary School	120	76	105	102	87	60	59	60	549
Wembley Primary School	120	107	119	117	114	120	116	117	810
<b>Total</b>	<b>720</b>	<b>512</b>	<b>628</b>	<b>614</b>	<b>639</b>	<b>556</b>	<b>684</b>	<b>538</b>	<b>4,171</b>
<b>Planning Area 3 schools near the Strathcona site of Roe Green Infant School</b>									
Ark Academy	60	59	57	59	59	59	60	56	409
Chalkhill Primary School	60	60	60	60	60	58	86	90	474
East Lane Primary School	120	90	75	44	29		26		264
Sudbury Primary School	120	120	118	119	121	120	120	119	837
<b>Total</b>	<b>360</b>	<b>329</b>	<b>310</b>	<b>282</b>	<b>269</b>	<b>237</b>	<b>292</b>	<b>265</b>	<b>1984</b>

Source: October 2018 census

## Consultation on Change of Character of Roe Green Infant School from September 2020

### 3. Detail of Proposals

In the context of current and predicted demand and places available at other local schools, primary provision on the Strathcona site of Roe Green Infant School is not considered to be sustainable or required. It is therefore proposed that the site ceases to be used for primary provision and the legal status of Roe Green Infant School reverts to its position before 2015, operating from its Princes Avenue site for Reception to Year 2.

There are different ways that provision on the Strathcona site of Roe Green Infant School could come to an end:

- a phased closure of the provision (which means children would remain at the school until the end of year 6);
- a full closure of the provision at a fixed point in time (which means that all children would move to alternative schools);
- a combination of the above - (for example children in Key Stage 1 could be relocated to alternative schools, while children in the Key Stage 2 remain until the end of year 6);
- any alternative proposal resulting from responses received during this informal consultation.

As the Admission Arrangements for 2020/21 have already been formally determined, the council would need to seek a variation to the Published Admission Number (PAN) for Roe Green Infant School to reduce it from 150 to 120 from September 2020 from the Schools Adjudicator. This would mean that the main school site in Princes Avenue would continue to admit 120 pupils to Reception, but no admissions would be made at the Strathcona site.

To change the age range of Roe Green Infant School from 4-11 years to 4-7 years, the council would need to include, as part of the statutory notice, full details of how this would be implemented. In the event of a phased closure, the age range of the school would remain as 4-11 years as long as children are still on roll at the Strathcona site. In-year applications could still be made for Key Stage 2 year groups that are still running.

If the proposals were eventually to be implemented, then this would impact on Roe Green Infant School's staffing requirements and there may be a need to consider potential redundancies for staff which would be subject to a separate formal consultation process in line with the school's procedures.

## Consultation on Change of Character of Roe Green Infant School from September 2020

4.	<p><b>Does this affect Roe Green Junior School?</b></p> <p>Roe Green Junior School is on the same site as the Princes Avenue site of Roe Green Infant School. Both schools are separate entities. Children who attend the Princes Avenue site of Roe Green Infant School will continue to apply for a school place for their Year 3 to year 6 education. Roe Green Infant School will remain as a feeder school to Roe Green Junior School. <b>There is no change proposed for Roe Green Junior School.</b></p>
5.	<p><b>Frequently asked questions</b></p> <p>If the site closes, where will my child go to school?</p> <ul style="list-style-type: none"> <li>The nature of the closure has not been decided. If the closure is phased, some children will remain at the site until the end of Year 6. If a decision was taken by the local authority to close the whole site, or individual year groups, the local authority would work with parents to identify an alternative school place.</li> </ul> <p>Can I change my child's school now?</p> <ul style="list-style-type: none"> <li>Yes – you can submit an in-year application for any school. An offer will only be made for preference schools if there are vacancies.</li> </ul> <p>I have been offered a place at the Strathcona site of Roe Green Infant School, can I choose an alternative?</p> <ul style="list-style-type: none"> <li>We will write to any parents who receive an offer of a place at the school, but whose children have not yet started to advise them that this consultation is ongoing and to ask if they would like to receive an offer for an alternative school.</li> </ul> <p>Can applications still be made for the Strathcona site of Roe Green Infant School?</p> <ul style="list-style-type: none"> <li>While the site remains open, in-year applications can still be made and offers will be made if there are vacancies in a year group or class. If the decision is taken in September 2019 to cease the provision, parents will not be able to apply for a Reception place at the school for September 2020.</li> </ul> <p>What will happen to the existing school site?</p> <ul style="list-style-type: none"> <li>There are no formal plans which outline the future use of the site. The Strathcona site would be considered for other educational use if this proposal was implemented.</li> </ul> <p style="text-align: center;">Page 73</p>

## Consultation on Change of Character of Roe Green Infant School from September 2020

**6.**

### **Timeline**

Brent Council will follow the statutory guidance set out in the Department for Education document 'Making significant changes ('prescribed alterations') to maintained schools'.

The timetable for the full process is as follows:

Date	Action
20 March 2019	Informal Consultation begins
02 April 2019	Consultation meeting for school staff at 4.00pm
02 April 2019	Consultation meeting for school governors at 5.30pm
04 April 2019	Consultation meetings for the public at 9.00am and 5.00pm
7 May 2019	Informal Consultation closes – deadline for responses
17 June 2019	Cabinet decision on agreeing formal consultation
20 June 2019	Publication of statutory proposal notice and formal consultation
19 July 2019	Formal Consultation closes
09 September 2019	Final Decision by Cabinet
01 September 2020	Planned closure commences

All timings are subject to change.

If, after this informal consultation, Brent Council decides to proceed with the proposal, a statutory notice would be published in accordance with school organisation legislation. This would provide a further period of four weeks of formal consultation when anyone can comment on any aspect of the proposal whether in support or disagreement.

Following the representation period, Brent Council's Cabinet would make a final decision on the proposal in accordance with Government guidance for school organisation decisions, taking into consideration consultation and statutory proposal responses.

A decision has to be taken within two months of the end of a statutory proposal representation period. If this proposal proceeds, it is anticipated that this decision would be taken by Cabinet in September 2019.

**Consultation on Change of Character of  
Roe Green Infant School from September 2020**

**7. How you have your say**

Brent Council would welcome your views on this proposal to decrease the age-range and size of Roe Green Infant School by ending provision on the school's Strathcona site.

You can let us know your views by submitting a response to this consultation document and/or attending one of the consultation meetings that are being organised for the public (including parents), staff and governors.

**The informal consultation closes on 07 May 2019** – please ensure that you have your say before then.

Please have your say by:

- Completing the attached Response Form and returning it by email or post to the council.

Email: [StrathconaConsultation@brent.gov.uk](mailto:StrathconaConsultation@brent.gov.uk)

Post to: Admissions and School Organisation Team,  
5<sup>th</sup> Floor, Brent Civic Centre, Engineers Way, Wembley, Middlesex, HA9 0FJ

- Attending a consultation meeting:

The following consultation meetings are being held at Roe Green Infant School (Princes Avenue site):

- **Consultation meeting for staff**                      **2 April 2019 at 4.00 – 5.00 pm**
- **Consultation meeting for governors**      **2 April 2019 at 5.00 – 6.00 pm**

The following consultation meetings are being held at the Strathcona site of Roe Green Infant School (Strathcona Road):

- **Public consultation meeting**                      **4 April 2019 at 9.00 – 10.30 am**
- **Public consultation meeting**                      **4 April 2019 at 5.00 – 6.30 pm**

Copies of this document are available from Roe Green Infant School (the Princes Road and Strathcona Road sites), and on request from the Admissions and School Organisation Team at [StrathconaConsultation@brent.gov.uk](mailto:StrathconaConsultation@brent.gov.uk).

The Consultation and response form are available online at Brent Connects consultations - [www.brent.gov.uk/your-community/brent-connects](http://www.brent.gov.uk/your-community/brent-connects).

A limited translation service can be provided for this document on request to [StrathconaConsultation@brent.gov.uk](mailto:StrathconaConsultation@brent.gov.uk).

**Consultation on Change of Character of  
Roe Green Infant School from September 2020**

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**Consultation on Change of Character of  
Roe Green Infant School from September 2020**

**Roe Green Infant School Consultation Response Slip**

Please return: **07 May 2019**

**I agree / disagree with the proposal to change the age range and capacity of Roe Green Infant School so that it includes the closure of the Strathcona Road provision**

☐ **Agree**

☐ **Disagree**

**Comments:**

Please continue on a separate sheet if necessary

**I believe that the closure should be:**

- ☐ **phased with all children remaining at the school until the end of year 6**
- ☐ **at a fixed point in time with all children moving to alternative schools**
- ☐ **a combination of the above**
- ☐ **a different approach (please provide details)**

**Comments**

Please continue on a separate sheet if necessary

**Name..... Signed.....**

**Telephone..... E-mail.....**

**Consultation on Change of Character of  
Roe Green Infant School from September 2020**

**Please indicate if you are a:**

- ☐ Parent  
☐ Governor

- ☐ Member of staff  
☐ Other

**If you are responding on behalf of a business or organisation, please provide details**

.....

**If you are a parent of a child attending the Strathcona site of Roe Green Infant School, or of a child who is due to start at the school, please indicate their current year group.**

- |                                    |                                 |                                 |                                 |
|------------------------------------|---------------------------------|---------------------------------|---------------------------------|
| <input type="checkbox"/> Nursery   | <input type="checkbox"/> Year 1 | <input type="checkbox"/> Year 3 | <input type="checkbox"/> Year 5 |
| <input type="checkbox"/> Reception | <input type="checkbox"/> Year 2 | <input type="checkbox"/> Year 4 | <input type="checkbox"/> Year 6 |

**About you**

By answering the following questions, you will help us ensure that we deliver a fair service to all our community. You do not have to give us this information, but we hope you will. All information will be treated in the strictest of confidence and will only be used to monitor and improve Brent Council services.

**Gender (please tick one):**

- ☐ Male ☐ Female

**Age group (please tick one):**

- |                                |                                |
|--------------------------------|--------------------------------|
| <input type="checkbox"/> 0-15  | <input type="checkbox"/> 16-24 |
| <input type="checkbox"/> 25-34 | <input type="checkbox"/> 35-44 |
| <input type="checkbox"/> 45-54 | <input type="checkbox"/> 55-64 |
| <input type="checkbox"/> 65-74 | <input type="checkbox"/> 75+   |

**Which one of these groups do you feel you belong to? (please tick one)**

- |  |  |
|--|--|
| <input type="checkbox"/> Asian Indian                    | <input type="checkbox"/> Asian Pakistani               |
| <input type="checkbox"/> Asian Bangladeshi               | <input type="checkbox"/> Asian Other                   |
| <input type="checkbox"/> Black Caribbean                 | <input type="checkbox"/> Black African                 |
| <input type="checkbox"/> Black Other                     | <input type="checkbox"/> Chinese                       |
| <input type="checkbox"/> Mixed White and Black Caribbean | <input type="checkbox"/> Mixed White and Black African |
| <input type="checkbox"/> Mixed White and Asian           | <input type="checkbox"/> Mixed Other                   |
| <input type="checkbox"/> White British                   | <input type="checkbox"/> White Irish                   |
| <input type="checkbox"/> White Other                     | <input type="checkbox"/> Other Ethnic Group            |

Other Ethnic Group - please specify

**Please return this form by post or e-mail:**

- Post: Admissions and School Organisation Team,  
5th Floor, Brent Civic Centre, Engineers Way, Wembley, Middlesex HA9 0FJ
- Email: [StrathconaConsultation@brent.gov.uk](mailto:StrathconaConsultation@brent.gov.uk)



## Appendix B

### Summary of feedback from Informal Consultation on the School Organisation Arrangements of Roe Green Infant School

1. This document provides a summary of responses received by the council during informal consultation on the School Organisation Arrangements of Roe Green Infant School. It draws on comments and issues raised on proposals to cease primary provision on the Roe Green Strathcona site in meetings with staff, governors, parents and the wider public and feedback received through written responses.
2. Over 200 people attended consultation meetings and a total of 463 written responses were received and a petition with 396 signatories (Table 1). The majority of respondents opposed the closure of primary provision on the Strathcona site.

**Table 1: Summary of Written Responses**

	Number of responses received	Percentage of response overall
Agree with proposal	3	0.6%
Disagree with proposal	460	99.4%
Unclear	0	0%
<b>Total responses</b>	463	100

3. A number of themes emerged during the informal consultation and the responses have been grouped into the following categories:
  - **School Place Planning**
  - **Promotion of school**
  - **Quality of Education**
  - **Impacts of the closure proposal**

#### **4. School Place Planning**

##### **4.1 Points raised**

- The majority of attendees at the consultation meetings raised questions about the accuracy of projections and concerns that the council was concentrating on pupil numbers rather than children.
- Questions were raised about why the council was proposing to close the Strathcona provision now, if it was opened as a temporary site in 2014 and only made permanent in 2016. Respondents suggested the authority should have

analysed pupil projections more carefully before making the decision to make the provision permanent.

- The point was made that before the provision was made permanent, teachers were on temporary not permanent contracts. It was suggested that the authority should have taken corrective action then before the provision became permanent.
- Questions were raised about the amount of new accommodation being built across the borough that would increase the number of families meaning that there would be more children, whereas the Local Authority was saying there will be fewer children in the future.
- Parents and staff wanted to know why this particular site had been picked for closure with a concern that the school had been unfairly chosen.
- The school made the point that many children join the school in-year rather than at reception and stated that the school played a key role for the authority in taking these children.
- The Local Authority was criticised for expanding other schools, such as Preston Park, and for expanding some schools from 3FE to 5FE. The council's decision to expand other schools was questioned and whether account had been taken of the impact of these expansions on the Roe Green Strathcona provision before they were agreed.
- It was suggested that the Local Authority should reduce larger schools, taking pressure off those schools to keep Strathcona open. The Local Authority was asked to look at options, such as moving children from schools that have higher numbers of pupils on roll to the Strathcona site.
- Staff at the Roe Green Strathcona site said that more could have been done to make the school a success and that if other schools had not been allowed to expand the children would have come to Strathcona.
- The Executive Headteacher of the school stressed that the school had not wanted to expand but did so at the authority's request. She explained that originally the expansion was going to be on the Kingsbury High School site, but the accommodation was then taken by The Village School. She explained that the provision was initially temporary with parents offered permanent places elsewhere as they became available. The head teacher emphasised that at every step of the process the senior school staff have engaged with the borough about the provision.
- The issue of a new school opening in Wembley was raised and why this was planned if forecasts say there are not enough children.

## **4.2 Response**

The Local Authority relies on population forecasts provided by the Greater London Authority (GLA) to inform the demand for school places. This data draws on birth rates, migration trend data and housing supply data from the Local Authority. Population forecasts are updated annually and are subject to change based on changes to any of the key indicators. For example, lower birth rates or increased migration away from the Local Authority area would result in lower projected demand.

At the time the Strathcona Site of Roe Green Infant School was opened, there was clear demand for additional places and the Strathcona provision was part of a wider expansion of primary school provision across Brent. When the school was made permanent, there was still an expectation that the places would be required. However, primary schools are now experiencing reduced intakes and the most recent projections provided by the GLA show that this pattern is expected to continue across the borough until at least 2022/23. The Local Authority currently has a surplus of primary school places across the borough. On National Offer Day (16 April 2019) for Reception places in 2019, 30 of the 57 schools that offer places in Reception had vacancies, and there were over 750 vacancies in total.

The Local Authority has undertaken informal consultation on the closure of the Strathcona provision at Roe Green Infant School as part of wider measures to reduce capacity across the borough. The number of vacancies for Reception in 2019 is expected to be over 15% of the total capacity, whereas 5% spare places is considered to be a reasonable planning margin to allow for unanticipated increases in demand or in-year pupil movement. A high number of spare places means that parents have increased choice, but can make it difficult for schools to manage given the uncertainty about demand.

The Local Authority has already consulted to reduce the published admission number at two schools which will take effect from September 2020. Officers are also working with a number of primary schools who will have more than 30 vacancies in 2019 to implement an informal cap to the numbers entering the school in 2019, so that they do not have to open an additional class unless there is a particular need to do so (such as increased demand in the school or the area).

The Strathcona provision admits a number of children throughout the academic year in year groups other than Reception. However, the data shows that although new pupils are being admitted, other children are leaving which means that overall the numbers attending the school have reduced over time. Of the current Key Stage 2 year groups, only Year 3 has seen an increase of 3 pupils on roll since the cohort started at the school. Years 4, 5 and 6 have decreased by 6, 5 and 3 since 2016/17.

The Local Authority has no role in the opening of new schools. The proposed new primary school (Ark Somerville) in the Wembley Park area is a Free School that has been approved by the Department for Education. Any future decisions on the school will be subject to the agreement of the Secretary of State for Education. The Local Authority's view is that the school should only open if there is sufficient pupil demand as new housing comes on stream.

## **5. Promotion of the school**

### **5.1 Points raised**

- Parents raised concern it is difficult to find the site as it is not on the Local Authority's 'School Finder' search map.

- A view was shared that because the Local Authority had not given enough publicity to the school, people are making a preference for other schools. The point was made that, as the provision does not have a catchment area like other schools, parents do not know it exists and therefore are not encouraged to apply for a place.
- The leadership of the school said that it had contacted the Local Authority on several occasions to raise concerns about the school not being marketed in the same way as other schools. The lack of advertising was considered by the school as the reason why the school has low intakes and it was suggested that if this was rectified, there would be sufficient pupils for the provision on the Strathcona site to be sustainable.
- The point was made that, when Strathcona first opened, parents were told that it was only temporary provision, so children only stayed until they were offered a place somewhere else.
- The Local Authority was criticised for not offering the school any help to increase numbers and for relying on the school to be creative. Staff said that the school is very flexible and can offer vertical streaming. The school has also considered providing nursery provision or a centre for children with additional needs. The school's view is that they have not been given the chance to increase admissions as it can take up to 10 years for a new school to establish itself.
- Concern was raised about whether the Local Authority has considered how the proposed closure of Strathcona will impact on the good reputation of Roe Green Infant School.

## 5.2 Response

The Local Authority notes that the Strathcona provision cannot be found on the School Finder pages of the Brent website. As the Strathcona provision is a part of Roe Green Infant School and is not a separate school, in itself, the school has only one entry on the 'Get Information About Schools' website run by the Department for Education (DfE) and it only has one DfE number. The provision does, however, have a separate entry on the eAdmissions website for applications for children starting in Reception and can be found using the admissions system map search. The school also appears on Brent Council's Parent Portal and drop down menu of schools for children who require an in year school place. The school also appears on other search engine maps.

The Strathcona provision has been included in the Local Authority's Primary School Information booklet each year since 2016. The introduction of the Community School page explains the uniqueness of Roe Green Infant School and how applications can be made for children to attend either site. On preference forms, parents can make it clear for which site they would like to be considered for a school place.

The Local Authority does not take any additional measures to individually promote any school above another. Schools use a range of marketing strategies to make parents aware of what they offer.

This proposal is driven by reducing demand across Brent which has resulted in low intakes on the Strathcona site. Within this context, there is no evidence that intakes would significantly increase if the more time was allowed to market the provision.

## **6. The Quality of Education and School Budgets**

### **6.1 Points raised**

- Staff, governors and parents all stated that the quality of provision provided at Roe Green Infant School was good. Several parents and staff raised that fact that the school was in the top 3% in England (based on the year 6 SATs progress measure) and had received a letter from the Minister for Education congratulating them on this performance.
- Many parents, teaching staff and pupils explained that the school provides an inclusive environment that helps all children thrive and to be confident. One parent, for example, thanked the school for the support they had given to their son who has autism that had helped him to become more independent and to develop his capacity to learn.
- Staff talked about the unique opportunities they have access to working in a school that has both infant and primary provision. The school said that the primary phase experience meant that staff would be well-placed to work with Roe Green Junior School in the future should the two schools ever come together as one.
- The quality of the staff was praised and the support they provide to children and their families, especially children who join the school with limited English. Many parents and children and young people talked about their personal experience of the school and the dedication of staff. One parent, for example, said that their daughter had started at the end of year 2 with no English. The school had offered extra lessons and with the support of staff, she was one of the highest achievers in her SATs. Other parents said that they travelled some distance to attend the school because of the quality of education and because their children were happy there (from Watford and Edgware, for example).
- The fact that provision on the Roe Green Strathcona site is effectively a small school was highly valued by parents and staff. The point was made that not all children can cope in large schools. The view was that the Local Authority should nurture, not close, a small school.
- The issue of how you measure value for money was raised. The leadership team noted that the split site funding the school receives gives them a much lower budget than a one form entry school would receive. The school feel that they give very good value for money.
- Other responders said value for money should be about the quality of provision not the cost of providing it.
- The point was made that Roe Green Infant School does not operate as a 1FE school – it is a split site school. The view was given that the larger site helps to off-set the smaller site's costs and allows the school to do lots of flexible things that other schools cannot do.

### **6.2 Response**

It is agreed that Roe Green Infant School is a good school and the authority acknowledges the dedication of staff and the inclusive environment that has been

created on the Strathcona site for the children who attend. There are, however, other good schools in Brent and 93% of children in Brent attend good or outstanding schools.

The proposal to close the Strathcona provision is due to falling demand for primary school places, not the quality of provision. The Local Authority is responsible for ensuring that the Dedicated Schools Grant is used effectively to provide a good education for all pupils.

The proposal to close the Strathcona provision is being made in response to the low numbers of pupils attending the site in the lower year groups and the projected number of pupils expected to apply in future years. If pupil numbers continue to reduce on the Roe Green Strathcona site, the cost of provision on the site will increase. In the longer term it would become increasingly difficult to manage Key Stage 2 provision with only around 7 children in each year group, even if vertical grouping is used, and this could impact on the quality of provision for pupils at Roe Green Infant School, as funding reduces and fixed cost expenditure remains stable.

## **7. Impact of closure**

### **7.1 Points Raised**

- Concerns were raised about the psychological and emotional impact of the consultation on the health and wellbeing of children, many of whom are worrying about their school closing, and the Local Authority was criticised for not mentioning this.
- Concern was raised that the proposals would be disruptive to children's education and would impact on vulnerable children and families who attend Strathcona, many of whom have moved around a lot. The view was that closing the site down would not be in the best interests of the children or parents.
- The impact on teachers was raised, in relation to potential redundancies and financial hardship, many of whom have mortgages.
- The point was made that it is misleading to suggest that the proposal could only affect staff on the Strathcona site, as Roe Green Infant School is one school with two sites and all staff, including senior staff, would be affected. Concerns included low staff morale and potential redundancies.
- The Governing Board of the school stated that Roe Green Infant School is currently stable financially and in terms of pupil outcomes, but the closure could destabilise the Princes Avenue site and the Local Authority has not considered this.
- The authority was criticised for the consultation document reading like a business document and not recognising there is a human element to the proposals - the council needed to think about the children.
- Staff raised the point that the kitchen on the Strathcona site is used to prepare meals for both sites and previously also provided food for other schools. The council was asked what the plan was in relation to catering.

- Questions were asked about where children would move to if the provision closed, if parents would be guaranteed their choice of alternative schools and if all pupils in a class could move to the same school with their friends.

## 7.2 Phased Closure

As part of the informal consultation, respondents were asked to provide a view on the form that closure of the provision should take in the event that the council decided to proceed with the proposal. The majority of respondents did not answer this question (300). Of those that did respond, only 17 suggested the Strathcona site should close at a fixed point in time. 64 said a phased approach should be followed and a further 17 that a combination of a phased closure and closure at a fixed point in time should be pursued. 63 said that a different approach should be taken, but did not elaborate on what this could be.

**Table 2: Views on implementation**

Respondent	How the school should be closed					
	Phased	At a fixed point	Phased and a fixed point in time combined	A different approach	No option stated for closure	Multiple options stated for closure
Parent	41	17	12	37	164	2
Governor				1	5	
Staff	5		3	10	55	
Other	15		2	9	51	
Did not indicate	3			6	25	
Total	64	17	17	63	300	2

## Response

The Local Authority recognises that consultation on any changes to school provision can be unsettling for the community that it affects and creates a climate of uncertainty.

If the proposal is taken forward, then implementation would aim to minimise the direct impact on children currently attending the Strathcona site through a phased closure. The Local Authority would facilitate any transitions that may be required for these pupils, although parents would also be free to move their children at any time to another school with vacancies. The Local Authority would not prescribe to parents which school their child must attend and the closure of any particular year groups would be managed carefully.

The council recognises that as Roe Green Infant school is one school operating from two sites, staff work across the two sites and that the impact of this proposal will affect the whole school. Any staff redundancies would be managed in line with established procedures. The Local Authority would work with Roe Green Infant School, other schools and unions to minimise the impact of redundancies and to maximise the availability of redeployment options should the proposal proceed.

Regarding the use of kitchens, no decisions have been made about the future use of the school site. If the site was to close, the Local Authority would work with the Governing Board of Roe Green Infant School to ensure that children continued to have access to school meals.



## Appendix C

### EQUALITY ANALYSIS (EA)

<b>POLICY/PROPOSAL:</b>	Closure of primary provision on the Roe Green Strathcona site
<b>DEPARTMENT:</b>	Children and Young People
<b>TEAM:</b>	Admissions and School Organisation Team, Forward Planning, Performance and Partnerships Service
<b>LEAD OFFICER:</b>	Shirley Parks
<b>DATE:</b>	17 May 2019

*NB: Please ensure you have read the accompanying EA guidance and instructions in full.*

#### SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Roe Green Infant School is situated in the north of the borough. Following discussions with schools in Autumn 2013 about the urgent need for more school places to meet unanticipated demand, the Governing Board of Roe Green Infant School agreed to expand on a temporary basis in March 2014 on a site in Wembley known as the Roe Green Strathcona site. The provision was for 210 places in total with 30 in each year group from Reception to Year 6. This involved changing the age range of the school from 3 – 7 years to 3 – 11 years (including nursery). Following Department for Education guidelines this arrangement became permanent from 2016.

Many other schools in the borough have also expanded on a permanent basis, thereby increasing the supply of places to meet anticipated demand. Demand for places across London has, however, decreased.

There are currently 110 pupils on the Roe Green Strathcona site, with only 7 pupils in Reception. Other than Year 5, all year groups currently have significantly lower numbers than 30. Applications for Reception places on the Strathcona site for September 2019 are also low, with only 6 first preferences.

The low number of pupils provides a significant budget challenge and the school currently has some vertically grouped classes (eg Reception and Year 1). There are other schools in the local area with unfilled places that serve families who live close to the Strathcona site provision.

The proposal is to close provision on the Roe Green Infant School Strathcona satellite site by:

- Changing the age range of the school from 3 – 11 years to 3 - 7 years (including the nursery)
- Reducing the school's Published Admissions Number from 150 pupils to 120 pupils for September 2020

Alongside these changes, plans will be made for pupils currently at the site. This could take the form of a phased programme to cease provision on the site.

Roe Green Infant School will revert back to the status it had in 2015 i.e. an infant school with a PAN of 120 and 360 places across Reception to Year 2.

2. Who may be affected by this policy or proposal?

Pupils  
Parents  
Residents in the Strathcona Road area i.e. Preston ward  
Staff based at the Roe Green School Strathcona Road site and staff at the main Roe Green Infant School site  
Governing Board

3. Is there relevance to equality and the council's public sector equality duty? If your answer is no, you must provide an explanation.

Yes

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age			X
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?		X

Would the policy or proposal change or remove services used by vulnerable groups of people?		<b>X</b>
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	<b>X</b>	
<b>If you have answered YES to ANY of the above, then proceed to section B.</b> <b>If you have answered NO to ALL of the above, then proceed straight to section D.</b>		

## SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

The 2019-23 School Place Planning Strategy, approved by Cabinet in November 2018, identifies reducing demand for primary places and increasing numbers of spare school places across the borough. Forecast data suggest that there will be insufficient demand for available places at the provision. Within this context the proposal is to cease provision on the site, as it is not likely to be sustainable longer term.

Applications for September 2019 have been analysed - this indicates that under 10 children will attend the provision, which would be the third year of low intakes on the site. The number of pupils on the site will be lower than 100 from September 2020 onwards if larger cohorts leaving in Year 6 are not replaced by a similar number in Reception.

The quality of the provision is not a concern - the school currently achieves good outcomes for pupils. However, sustaining a split site school where provision on one site is small becomes increasingly difficult as pupil numbers continue to fall. Sustaining a small school does not represent good value for money and the per pupil cost of provision is already higher than the Brent average.

Several other schools in the area served by provision on the Roe Green Strathcona site have expanded, so there would be sufficient places in the local area to meet demand if this provision were to close.

Data on pupils at the school suggest that the intake is similar to other schools in terms of ethnic diversity, children on free school meals and children with special needs and disabilities. This indicates that attending other local schools would not have a negative impact on children that might otherwise attend provision on the Roe Green Strathcona site.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

**AGE**

<b>Details of impacts identified</b>	<p>If the Strathcona site is closed it will affect 4 – 11 year olds who attend that site and who live in the local area as the option to attend provision on the site will no longer be available.</p> <p>The proposal may only affect certain year groups as implementation would not be until September 2020 and by then some pupils would have already left the school. If closure of the provision is progressed, some children may need to move school. Opportunities to minimise impact have been considered and a phased closure is proposed with no Reception intake from 2020 and the school fully closing in 2021/22. This would allow pupils on roll in September 2019 to remain at the school for 3 years and for all to complete their current key stage, other than Year 3. Parents would be supported to identify an alternative school place if they requested to do so.</p> <p>The closure may affect siblings of pupils attending the site if they had an expectation of attending the site. They may have to attend a different school (depending on which year group they are in) which could affect the whole family.</p>
<b>DISABILITY</b>	
<b>Details of impacts identified</b>	The Roe Green Strathcona site is fully accessible. If children with disabilities or with SEND attend the site move school, an alternative place will be identified that meets their needs.
<b>RACE</b>	
<b>Details of impacts identified</b>	Pupils at the Roe Green Strathcona site represent the diversity of Brent. Other schools in the area also have diverse intakes and it is not considered that attending an alternative school would have a negative impact on the basis of race.
<b>SEX</b>	
<b>Details of impacts identified</b>	N/A
<b>SEXUAL ORIENTATION</b>	
<b>Details of impacts identified</b>	N/A
<b>PREGANCY AND MATERNITY</b>	
<b>Details of impacts identified</b>	N/A
<b>RELIGION OR BELIEF</b>	

<b>Details of impacts identified</b>	Roe Green Infant School is non-denominational. Many other schools in the area with spare places are also non-denominational.
<b>GENDER REASSIGNMENT</b>	
<b>Details of impacts identified</b>	N/A
<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>	
<b>Details of impacts identified</b>	N/A

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Yes. During informal consultation on the proposals, all stakeholders were invited to comment on the proposals. Consultation responses have informed the formal statutory consultation being proposed in relation to ceasing the provision on the site and the nature of those proposals, which will be designed with the aim of minimising any potential negative impacts on children and their families.

5. Please detail any areas identified as requiring further data or detailed analysis.

N/A

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

If following consultation a decision is taken to close the site, the proposals would be implemented from September 2020. This will allow time to plan implementation to minimise impacts on children and their families. There are many schools in the local area with vacant places that could accommodate current pupils and pupils who might have chosen this school in the future.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

The consultation process to change the character of Roe Green Infant School is in two parts:

- a) Part 1: Informal consultation (non statutory), which informed the proposals
- b) Part 2: Formal consultation - Stage 1- Publication of Statutory notice; Stage 2 - Formal consultation providing the opportunity for Representations to be made to the local authority; Stage 3 - Decision by the Brent Cabinet; Stage 4 - Implementation if Brent Cabinet agrees the proposal

The proposals have been reviewed after the informal consultation phase and informed by issues or concerns raised. The final decision will be made by Brent Cabinet after reviewing the responses to the informal and formal consultation.

If the decision is to proceed with the proposals, throughout the implementation process the Council will work closely with the school and will monitor the impact of the proposals on staff and children and their families with a view to developing any necessary mitigating actions. Parents would also be kept fully informed throughout the process and the authority would provide support as required.

## SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Based on current data analysis and information, officers are of the view that it is appropriate to proceed with formal consultation on the proposals.

## SECTION D – RESULT

<i>Please select one of the following options. Mark with an "X".</i>		
<b>A</b>	<b>CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED</b>	<b>X</b>
<b>B</b>	<b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b>	
<b>C</b>	<b>CHANGE / ADJUST THE POLICY/PROPOSAL</b>	
<b>D</b>	<b>STOP OR ABANDON THE POLICY/PROPOSAL</b>	

## SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

<b>Action</b>	<b>Expected outcome</b>	<b>Officer</b>	<b>Completion Date</b>
Review concerns and issues raised during informal consultation	Inform final proposal and implementation plan taken forward	Michael Rollin	June 2019

Establish a clear implementation plan, working with the school leadership team and governing board	To mitigate any potentially negative impacts	Michael Rollin with support from other services	September 2019
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## SECTION F – SIGN OFF

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Michael Rollin
<b>REVIEWING OFFICER:</b>	Shirley Parks
<b>HEAD OF SERVICE:</b>	Shirley Parks

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	<b>Cabinet</b> 17 June 2019
	<b>Report from the Strategic Director,  Children and Young People</b>
<b>Multi-agency safeguarding children arrangements in Brent  – 2019 onwards</b>	

<b>Wards Affected:</b>	All
<b>Key or Non-Key Decision:</b>	Non-key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>No. of Appendices:</b>	One: <ul style="list-style-type: none"> <li>Draft Multi-Agency Safeguarding Children Arrangements In Brent</li> </ul>
<b>Background Papers:</b>	N/A
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	Meenara Islam Strategic Partnerships Manager <a href="mailto:Meenara.islam@brent.gov.uk">Meenara.islam@brent.gov.uk</a>

## 1.0 Purpose of the Report

- 1.1 This report presents the proposed partnership safeguarding oversight arrangements for Brent's children and young people. The paper summarises the national context and the proposed model to be implemented by 29 September 2019.

## 2.0 Recommendation

- 2.1 Cabinet is asked to consider and agree the proposed partnership safeguarding oversight arrangements.

## 3.0 Detail

### Context

- 3.1 The Children and Social Work Act 2017 made provision for the replacement of Local Safeguarding Children Boards (LSCBs) with new locally determined arrangements agreed and delivered by three statutory safeguarding partners – local authorities, CCGs and police.

- 3.2 Subsequently, statutory guidance in the form of Working Together to Safeguard Children (2018) was published setting out the framework for local safeguarding oversight arrangements.
- 3.3 Safeguarding partners have a shared and equal duty to make arrangements to work together to safeguard and promote the welfare of children. In doing so they can involve other relevant local agencies. The guidance states that the new safeguarding partners must:
- co-ordinate their safeguarding services
  - act as a strategic leadership group and
  - implement local and national learning including from serious safeguarding incidents.
- 3.4 Safeguarding partners are required to:
- agree and submit local safeguarding oversight arrangements to the Secretary of State for the Department of Education for approval
  - publish the approved arrangements by 28 June
  - wind down Local Safeguarding Children Boards and implement the new arrangements by 29 September 2019.

#### Developing Brent's arrangements

- 3.5 The leadership of Brent Council, Brent CCG and the North West Basic Command Unit formed the Brent Statutory Safeguarding Partners Executive Group (the Executive Group) in February 2018. The designated members of the Executive Group are:
- Cllr Butt, Leader, Brent Council
  - Cllr Patel, Lead Member, Children's Safeguarding, Early Help and Social Care, Brent Council
  - Carolyn Downs, Chief Executive, Brent Council
  - Gail Tolley, Strategic Director, Children and Young People and Statutory Director of Children's Services, Brent Council
  - Diane Jones, Director of Quality, representing Brent CCG (in place of Mark Easton, Accountable Officer, North West London Collaboration of CCGs)
  - Barry Loader, Detective Superintendent, Head of Safeguarding, North West Basic Command Unit (in place of Sarah Leach, Superintendent).

Also in attendance is Mike Howard, Independent Chair, Brent Safeguarding Children Board.

- 3.6 The Executive Group agreed it would:
- develop the new oversight arrangements in line with the requirements of Working Together 2018, local needs and the learning from Brent Safeguarding Children Board (BSCB)
  - examine and discuss emerging or current safeguarding issues in the borough and
  - oversee the transition between the BSCB and the new arrangements.

- 3.7 In October 2018 the Executive Group confirmed the future safeguarding oversight arrangements for children and young people in Brent in the form of a two tier structure. This consists of the Brent Statutory Safeguarding Partners Executive Group providing a high level strategic direction with a delivery focused Brent Safeguarding Children's Forum reporting to the Executive Group. The support of the Executive Group would be equally shared between the three safeguarding partner organisations and the Forum would be convened by an Independent Convenor. Statutory responsibilities and mandate will remain with the Executive Group. However, they may wish at points to delegate actions to the forum as appropriate.
- 3.8 Brent's multi-agency safeguarding oversight arrangements document, agreed by the Executive Group in April 2019, sets out the detailed arrangements which capitalise on the strengths and local progress made by the Brent Safeguarding Children Board. In addition to the terms of reference of both the Executive Group and Safeguarding Forum the document includes:
- list of the relevant agencies in the borough who will sit on the Safeguarding Forum to work together with the statutory safeguarding partners
  - a description of the links with other strategic partnerships such as the Brent Children's Trust and the Brent Safeguarding Adults Board
  - a description of the function and role of the Independent Convenor of the Safeguarding Forum
  - the expectation that Brent will be following the London Child Protection Procedures
  - arrangements for quality assuring activities to safeguard and promote the welfare of children
  - the multi-agency learning and development offer to ensure learning from local learning reviews and quality assurance audit findings are embedded across the multi-agency partnership.
- 3.5 The Executive Group will be seeking to submit Brent's safeguarding oversight arrangements document to the Department for Education for approval in June ahead of publication by 29 June 2019.

#### **4.0 Financial Implications**

- 4.1 Brent Council has been contributing to the resourcing of the Brent Safeguarding Children Board since its inception. It is expected that the Council will continue to make a similar contribution to the new multi-agency safeguarding arrangements as one of the three safeguarding partners. The funding for the new arrangements are due to be discussed and agreed at the next Executive Group meeting on 10 June 2019.

#### **5.0 Legal Implications**

- 5.1 The Council is exercising its functions within the legislative framework of the Children and Social Work Act 2017 sections (16) -(23), that repeals the statutory requirement contained in the Children Act 2004 for the establishment of an LSCB in each local authority area. The Child Safeguarding Practice Review and Relevant Agency (England) Regulations 2018 sets out the criteria the Child Safeguarding Practice Review Panel must take into account when determining

whether serious child safeguarding cases raise issues that are complex or of national importance, along with arrangements for national reviewers and reports. Section 16 sets out the duties on local authorities to notify the Panel of events that meet the reporting threshold and the legislative requirements of the safeguarding partners in meeting their obligations.

- 5.2 Consideration for the General Data Protection Regulation (GDPR) and Data Protection Act 2018 are taken into account within the statutory guidance for Information Sharing (July 2018). The legislative frameworks have been reflected within the draft Multi-agency safeguarding children arrangements in Brent document agreed by Brent Safeguarding partners.

## **6.0 Equality Implications**

- 6.1 The Council must, in the exercise of its functions, have due regard to the need to (a) eliminate discrimination, harassment and victimisation (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it, s149 Equality Act 2010.
- 6.2 The s149, Public Sector Equality Duty (outlined above) cover the following nine protected characteristics: age, disability, marriage and civil partnership, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 6.3 The multi-agency safeguarding children arrangements in Brent have been jointly developed by Brent Council, Brent NHS CCG and the North West Basic Command Unit. The three safeguarding partners have a shared and equal duty to make arrangements to work together to safeguard and promote the welfare of all children in Brent. In discharging their duty safeguarding partners must be assured by partner agencies in the borough that multi-agency services are accessible, inclusive and responsive to the diverse needs of Brent's children and young people, including those with additional needs and/or vulnerabilities. The safeguarding partners will also ensure that services are culturally aware and skilled in identifying, assessing and meeting the individual needs of Brent children and their families.

**Report sign off:**

**GAIL TOLLEY**

Strategic Director of Children and  
Young People



**Brent**



**Brent**  
Clinical Commissioning Group



**METROPOLITAN  
POLICE**

**KEEPING CHILDREN SAFE IS EVERYONE'S RESPONSIBILITY**

**DRAFT**

# **MULTI-AGENCY SAFEGUARDING CHILDREN ARRANGEMENTS IN BRENT**

<b>Draft:</b>	<b>Version 7</b>
<b>Approved by :</b>	
<b>Published :</b>	
<b>Review Arrangements :</b>	These arrangements will be reviewed on annual basis.

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- 3 Working in partnership**
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- 5 Local child safeguarding practice reviews**
  - Links with Brent and Harrow Child Death Overview Panel
- 6 Multi-agency learning and development**
- 7 Quality assurance and multi-agency auditing**
  - Section 11 audit
  - Themed multi-agency audits
- 8 Challenge, escalation and dispute resolution**

## 1. Introduction

- 1.1. This document sets out the agreed new partnership arrangements for safeguarding children and young people in the London Borough of Brent.
- 1.2. These new arrangements follow the introduction of the Children and Social Work Act in 2017 and the publication of the revised statutory guidance Working Together 2018: both of which set out what is expected of organisations, individually and jointly, to safeguard and promote the welfare of children.
- 1.3. Brent's arrangements have been designed to capitalise on the pre-existing engagement of a range of partner agencies and momentum developed by the Independent Chair of the Brent LSCB. The arrangements also aim to reflect the national legislative changes and the statutory leadership roles of the three safeguarding partners – local authorities, clinical commissioning groups and police.
- 1.4. The focus on these key agencies is not intended to diminish the important contribution other partners make to safeguarding local children and young people. It recognises that to make further progress, then the three safeguarding partners need to take a greater level of responsibility.
- 1.5. Working Together 2018 names the lead representatives from each of the three safeguarding partners as “the local authority chief executive, the accountable officer of a clinical commissioning group, and a chief officer of police”. For Brent the lead representatives are:
  - Chief Executive, London Borough of Brent
  - Accountable Officer, Brent CCG
  - Chief Superintendent, North West Basic Command Unit (BCU)  
Commander, Metropolitan Police (Brent, Harrow and Barnet)
- 1.6. The lead representatives are able to delegate their functions although they retain accountability for any actions or decisions taken on behalf of their agency. In Brent, the lead representatives have identified the following senior officers in their respective agencies who have responsibility and authority for ensuring full participation with these arrangements:
  - Strategic Director Children and Young People and Statutory Director of Children's Services, London Borough of Brent
  - Director of Quality, Brent CCG
  - Superintendent (Safeguarding Lead), North West BCU
- 1.7. The senior officers have delegated authority to;
  - make decisions on behalf of their organisation or agency and commit them on policy, resourcing and practice matters
  - hold their own organisation to account on how effectively they participate in and implement the local arrangements

## 2. Overview of the safeguarding children arrangements in Brent

- 2.1. The three Brent safeguarding partners (Brent Council, Brent CCG and the Police) began meeting as a collective in December 2017 to agree a response to the national consultation on Working Together 2018.
- 2.2. In February 2018, the partners agreed that the pre-existing 'safeguarding Keeping in Touch' meetings would expand and form the Brent Statutory Safeguarding Partners Executive Group (Executive Group).

### **Brent Statutory Safeguarding Partners Executive Group**

- 2.3. The Executive Group agreed that the membership and attendance of this group must be (where possible) the most senior level of each organisation and remain consistent to ensure timely and effective decision-making and commitment.
- 2.4. The Leader of Brent Council and the Statutory Lead for Children's Services (Safeguarding, Early Help and Social Care) are politically accountable for ensuring the local authority fulfils its legal responsibilities for safeguarding and promoting the welfare of children. They provide the political leadership needed for the effective co-ordination of work with other agencies who have safeguarding responsibilities and therefore are also members of the Executive Group.
- 2.5. In October 2018, the Executive Group confirmed the direction of the future safeguarding oversight arrangements for children and young people in Brent. The arrangements consist of a two tier structure with the Executive Group providing high level strategic direction to a delivery focused Brent Safeguarding Children Forum made up of a diverse and wide ranging partnership.
- 2.6. The statutory responsibilities and mandate will remain with the Executive Group. However, they may wish at points to delegate responsibilities to the Forum as appropriate.
- 2.7. The Executive Group will fulfil the objectives, functions and responsibilities set out in Working Together 2018 to safeguard and promote the welfare of all children in Brent by;
  - agreeing the overarching strategic vision and local priorities for safeguarding children
  - challenging and holding the Safeguarding Forum to account
  - agreeing, publishing and reviewing the safeguarding oversight arrangements
  - monitoring serious child safeguarding cases which raise issues of importance
  - ensuring that the arrangements to work together to identify and respond to the needs of children in the area are effective and robust
  - identifying any new safeguarding issues and emerging threats
  - making the strategic links with other Brent partnerships
  - working closely with Harrow and Barnet equivalent executives on common strategic safeguarding issues across the North West BCU Police area
  - making provision for independent scrutiny of the safeguarding arrangements
  - producing an annual report



- 2.8. The Executive Group will meet quarterly, with the three partners sharing the responsibility to lead the planning, hosting and chairing of the meetings on a rotational basis. The meetings of the Executive Group will not be held in public.
- 2.9. A formal record of all Executive Group meetings will be taken and submitted for approval at the next meeting. This record, subject to issues of confidentiality and legal considerations, will be a public document and published on a Brent safeguarding independent website.
- 2.10. The meetings will aim to take place after the Safeguarding Children Forum meetings in order to receive a progress update from the Forum, to review priorities (if needed) and take decisions on relevant matters.
- 2.11. A meeting of the Executive Group requires at least one representative from each of the three safeguarding partners to be quorate. No decisions can be made without the meeting being quorate.

### **Brent Safeguarding Children Forum**

- 2.12. The Brent Safeguarding Children Forum is a wider partnership forum accountable to the Executive Group.
- 2.13. The Forum will co-ordinate and monitor multi-agency safeguarding oversight arrangements for effectiveness as set out in Working Together 2018 and will be led by an Independent Convenor.
- 2.14. The Forum is responsible for;
  - driving delivery of local safeguarding priorities set by the Executive Group
  - building relationships with other strategic partnerships, the local community, and schools and other educational establishments
  - seeking assurance on behalf of the Executive Group that partners are fulfilling their safeguarding responsibilities, sharing information effectively and have robust safeguarding policies and procedures in place through multi-agency audits (including S.11 audit) and Forum meetings
  - continuing to follow the London Child Protection Procedures and develop and maintain a Brent thresholds document
  - developing, implementing and monitoring the impact of an interagency safeguarding children learning and development offer, incorporating local and national learning from serious child safeguarding cases
  - analysing and considering partnership responses to any new safeguarding issues and emerging threats identified by the Executive Group
  - undertaking Local Learning Reviews on behalf of the Executive Group
  - developing ways for the safeguarding oversight arrangements to include the voices of children and families in Brent

- agreeing a way of reporting and using multi-agency management information, data and intelligence to establish an overview of and assess the effectiveness of safeguarding activity within Brent
- supporting agencies in resolving disputes that have been appropriately escalated
- developing an annual work programme for agreement by the Executive Group
- overseeing and guiding the work of the agreed priority groups.

- 2.15. The Safeguarding Forum will meet at least quarterly ahead of Executive Group meetings and the meetings of the Safeguarding Forum will not be held in public.
- 2.16. A formal record of all Safeguarding Forum meetings will be taken and submitted for approval at the next meeting. This record, subject to confidentiality and legal considerations, will be a public document and published on the Brent safeguarding independent website.
- 2.17. Attendance at all Safeguarding Forum meetings will be monitored and reported as part of the Executive Group annual report.
- 2.18. A meeting of the Safeguarding Forum requires at least one representative from each of the three safeguarding partners to be quorate. No decisions can be made without the meeting being quorate.
- 2.19. The Independent Convenor may raise any concerns regarding attendance and engagement of relevant agencies with both the agency concerned and the Executive Group.
- 2.20. The Safeguarding Forum can also request updates from the Brent Multi-agency Sexual Exploitation Panel (MASE), the Brent Vulnerable Adolescents Panel (VAP), the Multi-agency Public Protection Arrangements (MAPPA), the Multi-agency Risk Assessment Conference (MARAC) and any other Brent partnership forums to keep abreast of and consider future emerging issues.

### **Priority Groups**

- 2.21. The Executive Group has agreed to set up strategic priority themed groups that will be led by, and report to, the Safeguarding Forum.
- 2.22. The priority groups will be tasked with identifying and developing ways to enhance the multi-agency identification and response to tackling each agreed priority, set by the Executive Group.
- 2.23. The Executive Group has also agreed to include a Learning and Development Advisory Group and Case Review Group in this structure.
- 2.24. A graphical outline of the agreed structure is included in **Appendix A**.

2.25. In addition to the agreed priority groups, the Executive Group may decide to set up specific strategic working groups to consider particular emerging local or national priorities or initiatives.

2.26. The Executive Group will review the structure of these arrangements on an annual basis.

### **Support arrangements**

2.27. Brent Council's Strategic Partnerships Team will support the Executive Group with the coordination of these arrangements.

2.28. As well as supporting these arrangements the Strategic Partnerships Team also coordinates activities for other strategic partnership groups in Brent including;

- Brent Health and Wellbeing Board
- Brent Safeguarding Adults Board
- Brent Children's Trust

2.29. This arrangement allows stronger strategic coordination between the strategic partnerships in Brent to both avoid duplication and develop joint initiatives.

2.30. Brent Council will continue to take the lead responsibility in recruiting and managing appropriate staff to support the coordination of these arrangements.

### **Independent Convenor**

2.31. The Executive Group have agreed that the Safeguarding Forum will be led by an Independent Convenor.

2.32. The Executive Group is responsible for engaging the services of the Independent Convenor and consult the relevant agencies on any appointments to this role.

2.33. The appointment of the role will be as a paid position under contract. The contract will last for one year from the date of appointment, subject to annual review by the Executive Group. The number of contracted days will be at least 30 days within this period.

2.34. The Executive Group can extend the same appointment to the Independent Convenor role annually for a maximum of five years.

2.35. The Independent Convenor's role will include:

- attending the Executive Group
- chairing the Safeguarding Forum meetings
- appropriately challenging partner agencies and professionals for the purposes of safeguarding and promoting the welfare of children and young people in Brent
- providing direction to the Safeguarding Forum and ensuring statutory obligations and local priorities are being delivered

- managing all aspects of the Safeguarding Forum meetings, including setting the agenda in consultation with the Executive Group and Forum members
- preparing for and chairing meetings of the Local Learning Review Panel
- overseeing the progression case reviews to ensure they meet required timescales
- ensuring that the voices of children, young people and their families are represented in the work of the Safeguarding Forum
- ensuring that key local issues and national developments are considered by the Safeguarding Forum
- ensuring that the membership of the Forum is appropriate and representative of the local community and partner organisations
- challenging and monitoring the performance and participation of partners in the work of the Safeguarding Forum
- attending relevant regional and national meetings on behalf of the Executive Group
- reporting progress and any concerns to the Executive Group

## Financial Arrangements

- 2.36. The Executive Group will agree the annual contribution to the safeguarding partners funding required to meet the responsibilities, duties and objectives of the arrangements.
- 2.37. This agreement will be reviewed on an annual basis.
- 2.38. For 2019-2020 the funding arrangements will remain the same as previously agreed for Brent LSCB.
- 2.39. The financial year will run from the 1 April to the 31 March the following year, with contributing agencies being invoiced by the 1st October each year.
- 2.40. The income and expenditure will be managed and monitored by the Strategic Partnerships Team on behalf of the Executive Group.
- 2.41. The Executive Group will receive six monthly reports on the income and expenditure.
- 2.42. A comprehensive report identifying income and expenditure in line with Working Together 2018 requirements will be included in the Annual Report.

## Independent Scrutiny

- 2.43. The independent scrutiny function as set out in Working Together 2018, will provide the critical challenge and appraisal of Brent's safeguarding partnership arrangements.
- 2.44. The role of independent scrutiny will work independently of the Executive Group and will form part of the arrangements to;
  - provide assurance in judging the effectiveness of services to protect children on an annual basis

- assist when there is disagreement between the leaders responsible for protecting children in the agencies involved in multi-agency arrangements
- support a culture and environment conducive to robust scrutiny and constructive challenge

2.45. The Scrutineer will be independent from the statutory partners, and they will have expertise in child safeguarding, an understanding of local need and effective partnerships.

2.46. The Executive Group recognises that at the time of writing, consideration was being given at a regional level to how this function could be carried out across London. As a result, the Executive agreed an interim arrangement for the Independent Convenor to undertake this role.

2.47. Going forward, the Executive Group will:

- regularly review the scrutiny system and delivery against the scrutiny plan and will make changes as required
- be responsible for ensuring that any recommendations from scrutiny are taken forward

### 3. Working in Partnership

#### Relevant agencies

3.1. The Executive Group have selected the agencies and organisations drawn from a list of 'relevant agencies' set out in Working Together 2018.

3.2. These agencies and organisations have been chosen as they provide key strategic and operational insight to the safeguarding children and young people in Brent and these selected relevant agencies will form the core membership of the Brent Safeguarding Children Forum.

3.3. The Executive Group have selected the following relevant agencies and organisations as members of Brent's Safeguarding Partnership Forum;

- Brent Council Children and Young People Department
- Brent Council Housing
- Brent Council Adult Social Care
- Brent Council Public Health
- Metropolitan Police North West Borough Command Unit (BCU)
- Brent CCG (including the Designated Professionals)
- London North West University Healthcare NHS Trust
- Central London Community Healthcare Trust
- Central North West London Mental Health Foundation Trust
- London Ambulance Service
- National Probation Service
- Community Rehabilitation Company

- Queens Park Rangers Football Club
  - Children and Family Court Advisory and Support Service (CAFCASS)
  - Barnardos
  - Education establishments
- 3.4. In line with statutory guidance, the Executive Group will also consider the option of requesting representatives from additional agencies/organisations as the partnership develops.
- 3.5. The relevant agencies must nominate a particular senior officer with strategic responsibilities to represent their organisation as member of the Safeguarding Forum and attend all meetings, this is to ensure consistency and continuity in the membership and engagement.
- 3.6. The relevant agencies should take the necessary steps to ensure their representative is able to effectively contribute to the partnership work and is of sufficient authority to commit resources of their agency where required.
- 3.7. Forum members are responsible for sending a deputy to meetings in their absence. Forum members are also responsible for updating the group on any significant changes to personnel within their organisation (as well as any operational changes).
- 3.8. Forum members are expected to;
- proactively and enthusiastically engage with the partnership safeguarding arrangements
  - be able to influence the strategic planning for safeguarding children within their agency
  - be able to secure appropriate information from their agency to support the partnership work
  - ensure that decisions of the Forum are taken forward within their own agency, and any impediments or delays to their implementation are reported to the Board
  - be responsible for communicating the partnership work effectively within their agency
- 3.9. The Executive Group also recognise the importance of involving the local community in the arrangements and have agreed to retain the existing lay members of the LSCB arrangements.
- 3.10. These lay members will continue to act as valuable ambassadors to help build stronger links with the local community as part of the new arrangements and are encouraged to:
- promote awareness of safeguarding across Brent's communities
  - represent the community voice at Safeguarding Forum meetings
  - engage with Brent's people and local groups to support community cohesion

## **Role of early years settings, schools and other educational establishments in Brent**

- 3.11. The Executive Group recognise that early years settings, schools and other education establishments (including colleges) are an important part of safeguarding in Brent. They have responsibility to identify concerns early, provide help for children and families and prevent concerns from escalating.
- 3.12. Brent already has strong engagement from early years and schools with School representatives on the Board, priority groups and through the Section 11 audit process.
- 3.13. All Brent schools and colleges have designated safeguarding leads who meet regularly through the Brent Designated Safeguarding Leads (DSL) Network to discuss local issues.
- 3.14. The annual DSL conference (led by the Brent Schools Partnership - Safeguarding Lead School) also links into the Safeguarding Forum and explores identified priorities.
- 3.15. The education members of the Safeguarding Forum link into this network to enable the promotion of regular communication, challenge and support between these two groups.
- 3.16. The majority of schools in Brent are members of the Brent Schools Partnership, established by Brent schools to support schools in achieving the best possible outcomes.
- 3.17. In addition to the list of relevant agencies noted in section 3.3, the following representatives from Brent Primary, Secondary and Special Schools and Academies will also be core members of the Safeguarding Partnership Forum;
  - Deputy Head Teacher - College of North West London
  - Head Teacher - Stonebridge Primary School (Chair of the Brent Designated Safeguarding Leads Forum)
  - Head Teacher – Village and Woodfield Special Schools (Chair of Brent Schools Partnership - Partners for Excellence)
  - Deputy Head Teacher - Capital City Academy (Designated Safeguarding Lead)
  - Deputy Head Teacher – Newman Catholic College (Designated Safeguarding Lead)

## **Role of youth offending and custody services**

- 3.18. Youth Offending Services in Brent sit within Brent Council's Children and Young People Department and these services will be represented on the Safeguarding Forum through the Children and Young People senior management team.
- 3.19. The Young Offending Service will also contribute directly to the work of the Safeguarding Forum through relevant priority group activity and are already active members of the Child Exploitation Priority Group.



### **Relationship with other Brent strategic partnerships**

- 3.20. The Executive Group recognises that there is potential cross over in some areas of work and priorities with other strategic partnerships in Brent.
- 3.21. To allow the opportunity for other strategic partnerships to consider the progress of the safeguarding arrangements and contribute to the identification of local safeguarding priorities, the Executive Group will;
- continue to strengthen alignment with other Brent partnerships including the Brent Safeguarding Adults Board and the Safer Brent Partnership
  - request the Independent Convenor to attend as a standing member Brent Children's Trust and Safer Brent Partnership
  - share their annual report with other relevant partnership forums including Community Safety Partnership, and Brent Children's Trust
  - continue to seek opportunities to develop joint areas of work through addressing priorities such as violence against women and girls and exploitation

### **Relationship with other boroughs**

- 3.22. The Executive Group will promote the introduction of an annual safeguarding leadership summit to enable a level of strategic consistency and join-up with the two neighbouring boroughs (Harrow and Barnet) with which Brent shares a police command unit and some healthcare services.

### **Relationship with Brent Children's Trust**

- 3.23. The Executive Group agreed that the strong relationship developed between Brent LSCB and the Brent Children's Trust (BCT) will continue as part of the new arrangements.
- 3.24. The remit of the BCT links into the new arrangements as its primary function relates to ensuring that resources are allocated and utilised through commissioning, joint planning and collaborative working, to deliver the maximum benefits for children and young people in Brent.
- 3.25. The BCT remains responsible for;
- developing a joint vision and strategy for improving outcomes for children, young people and their families in Brent
  - ensure that priorities are informed by the views of children, young people, their families and the Joint Strategic Needs Assessment (JSNA)
  - work in partnership with all key delivery agencies to ensure delivery of key priorities and associated aims, targets and inspection criteria
  - set a clear framework for strategic planning and commissioning promoting integration and collaborative working between partners



## 4. Identifying and responding to the needs of Brent's children and families

### Using data and intelligence to assess the effectiveness of help

- 4.1. On behalf of the Executive Group, the Safeguarding Forum will receive and scrutinise the following to identify good practice and highlight any shortcomings within those agencies that require;
- existing data collected, analysed and reported on by safeguarding partners and relevant agencies
  - quality-assurance reports
  - data shared with other strategic partnerships in Brent

### Hearing and responding to the voices of children, young people and families

- 4.2. On behalf of the Executive Group, the Safeguarding Forum will seek assurance from the relevant agencies and other partners on how they ensure they have captured the voices of children, young people and families in their work.
- 4.3. The Safeguarding Forum will consider how to identify other innovative ways to gather this feedback through the partnership, including appropriately linking with existing forums for children, young people and families in Brent.

### Brent Thresholds Guide

- 4.4. The Executive Group agreed to adopt the recently published (February 2018) [Brent Thresholds Guide](#) which is aimed at all practitioners and volunteers supporting or working with children and/or their families within statutory, voluntary, private or independent organisations in Brent.
- 4.5. This guide is aimed at all practitioners and volunteers supporting or working with children and/or their families within statutory, voluntary, private or independent organisations in Brent. It aims to help individuals and organisations when making a referral for services to ensure children and families get the right level of support at the right time. It should be read alongside the [London Child Protection Procedures](#) and the [London Threshold: Continuum of Help and Support](#).
- 4.6. The Executive Group will review and update the Brent Thresholds Guide every three years or at the point of any legislation changes.

### Information sharing

- 4.7. Effective sharing of information between professionals and local agencies is essential and the Executive Group expects all organisations in Brent to have arrangements in place which set out clearly the processes and the principles for sharing information between each other and with other professionals.

- 4.8. Practitioners and senior managers should also refer to the Government's guidance '[Information sharing advice for safeguarding practitioners](#)' (updated July 2018) which has been produced to support practitioners in the decisions they take to share information, to reduce the risk of harm to children and young people.
- 4.9. The Executive Group expects that all members of the Safeguarding Forum will:
- ensure that their own organisation's Data Protection Registration and requirements under the General Data Protection Regulations 2018 (GDPR) meets the requirements
  - adhere to the provisions of the Data Protection requirements as amended by the GPDR 2018 and maintain confidentiality at all times, other than where a specific exemption under the Act arises <sup>1</sup>
  - make appropriate arrangements to ensure that the provisions of the Freedom of Information Act 2000 are properly complied with

### **Freedom of Information**

- 4.10. As the Executive Group is not a 'public authority' (as defined by the Freedom of Information Act 2000 Act), there is no obligation to respond to approaches to the Executive Group for information made under the Act.

## **5. Local child safeguarding practice reviews**

- 5.1. In line with Working Together 2018, the safeguarding partners have agreed procedures to manage the consideration of cases that might meet the criteria for both national and local learning reviews.
- 5.2. Brent Council must report a serious incident of child abuse or neglect, or the death of a child who is looked after to the National Child Safeguarding Practice Review Panel within 5 working days of becoming aware of a serious incident.
- 5.3. The safeguarding partners will, in consultation with the senior officers (paragraph 1.6), determine whether a case meets the criteria to be referred to the National Panel or an alternative form of learning lessons review.
- 5.4. A case review group will be the key mechanism for carrying out a rapid review of the case and will report to the safeguarding partner. This group will be chaired by the Independent Convenor.
- 5.5. The case review group will also be responsible for;
- considering all serious incident cases in Brent and making recommendations to the Safeguarding Partners for determination if the learning review criteria has been met

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<sup>1</sup> this principle will apply during a member's participation in the Safeguarding Forum, and will continue after the individual is no longer a member of the Partnership, or following the Partnership's dissolving. If any individual who has access to confidential information or data, knowingly breaches the law relating to particularly (but not limited to) the unauthorised disclosure of confidential information, they may be personally liable.

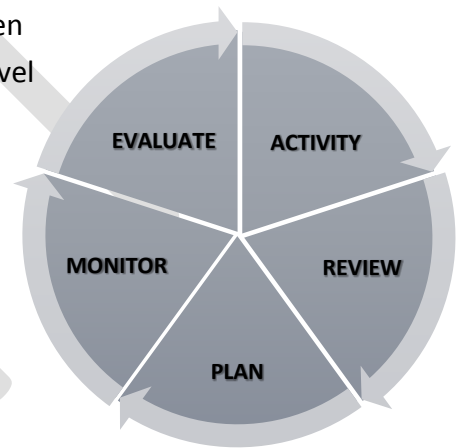
- identifying recommendations for any lessons to be learnt from serious incidents in Brent
  - coordinating the arrangements on behalf of the safeguarding partners for commissioning and publishing local child safeguarding practice reviews
  - developing the terms of reference, monitoring progress developing improvement plans coming for each local review
  - making recommendations for multi-agency learning events based on the findings arising from case reviews and what the process is for undertaking them
  - sharing examples of good practice to develop understanding of what works well
- 5.6. The case review group will have a fixed core membership drawn from the statutory partners and relevant agencies and with the flexibility to invite other relevant professionals to discuss certain cases as and when appropriate.
- 5.7. In order to ensure that a coordinated response fully addresses all concerns surrounding serious incidents, all relevant data should be shared and reviewed as permitted within legal and legislative data protection stipulations.
- 5.8. In recognition of the sensitive and confidential nature of business all agency representatives must sign a confidentiality agreement which includes the requirement to appropriately share and securely store information.
- 5.9. The impact that any local and relevant national reviews have on improving services and reducing the incidence of serious harm to children will be included in the safeguarding partners annual report.
- 5.10. Where possible and appropriate to do so, children, young people and families will be involved in learning reviews and events.
- 5.11. The activities of the case review group will be included within the safeguarding partners annual report.
- 5.12. Where matters of a confidential nature are discussed, any information published will be redacted accordingly to protect the subject.
- 5.13. Whilst the new Child Death Review arrangements are subject to a separate process, there are existing links with the Child Death Review process which will remain part of the new arrangements including;
- shared membership of the CDOP and the review group from Brent Council, Brent CCG and Metropolitan Police
  - a standing item on both groups agendas to provide two-way updates
  - discussions about how the processes will link where cases are considered by both groups

## 6. Multi-agency learning and development

- 6.1. The Executive Group have agreed to develop a multi-agency learning and development offer which builds upon the existing programme.
- 6.2. The offer will be coordinated by the part-time Strategic Partnership Learning and Development Coordinator and the multi-agency Learning and Development Advisory Group, which will report into the Safeguarding Forum.
- 6.3. The Learning and Development Advisory Group is responsible for;
  - promoting learning from safeguarding best practice
  - promoting learning around identified local and national priorities
  - promoting learning from local and national learning reviews and audits
  - providing updates on the progress and the impact of the multi-agency learning offer
  - providing recommendations and suggested actions to improve multi-agency practice through learning and development in Brent
- 6.4. The learning and development offer will comprise of a range of different learning opportunities including;
  - e-learning modules
  - themed briefings
  - awareness raising events
  - joint learning events/sessions with other strategic partnerships including Brent Safeguarding Adults Board
- 6.5. Any recommendations for learning and development activity will be approved by the Executive Group.
- 6.6. Learning events held to either launch or conclude one of the safeguarding priorities will include the input of the Independent Convenor as well as any experts as appropriate.
- 6.7. The Learning and Development Advisory Group will provide an annual update on the impact of the safeguarding learning and development programme to the Safeguarding Forum for inclusion the annual.

## 7. Quality assurance and multi-agency auditing

- 7.1. The Executive Group is committed to the continuous improvement of multi-agency safeguarding practice.
- 7.2. The Executive Group recognises there must be opportunities to learn from quality assurance activity in order to bring about sustained changes in practice and improved outcomes for children and families in Brent.
- 7.3. The Safeguarding Forum will undertake auditing activity to understand strengths and areas for improvement and take action to promote good practice.
- 7.4. The process will be based on a quality assurance and learning improvement cycle whereby;
  - quality assurance audits/case review activities are undertaken
  - information is collated at both a strategic and operational level reviewing the work taking place
  - actions are identified to address development areas in order to improve practice or safeguarding arrangements
  - plans are monitored and impact is evaluated
- 7.5. Multi-agency auditing work will take place in two main forms of activity;
  - section 11 audit
  - themed multi-agency audits (informed by identified local and national priorities)



### Section 11 audit

- 7.6. Section 11 of the Children Act (2004) places duties on a range of organisations and individuals to ensure that their functions are discharged with regard to the need to safeguard and promote the welfare of children.
- 7.7. The Executive Group have agreed that the Safeguarding Forum will assess and monitor compliance by undertaking a Section 11 audit.
- 7.8. This has been acknowledged to be an effective way of providing assurance to the Executive Group that partners and agencies are meeting their statutory safeguarding obligations.
- 7.9. The Executive Group will review the frequency and methodology of S11 audits on an annual basis.

## Themed multi-agency audits

- 7.10. Multi-agency themed audits focussing on the identified safeguarding priorities will be built into the Safeguarding Forum's annual work programme.
- 7.11. The multi-agency audit tool, developed by Brent LSCB, will be used which will be adapted to each specific audit. The use of this tool will support an effective and consistent auditing process.

## 8. Challenge, escalation and dispute resolution

- 8.1. Occasionally situations arise when workers within one agency feel that the actions, inaction or decisions of another agency do not adequately safeguard a child. Differences and debates are all part of multi-agency working and escalation guidance provides a useful framework to explore and resolve professional disagreements.
- 8.2. Disagreements are most likely to arise around;
- levels of need/thresholds
  - roles and responsibilities
  - progressing plans
  - communication
- 8.3. The Executive Group expects that;
- all agencies make use of escalation procedures to avoid exacerbating or prolonging conflict, and avoid any possible impact on children and young people
  - all agencies have their own escalation and whistleblowing procedures and should use these (as appropriate) in the first instance
  - agencies will have systems for recording when escalation policies are used and how disagreements are resolved
  - all agencies should use the [London Child Protection Procedures](#) professional conflict resolution procedures where there are disputes involving child protection procedures
  - the terms of reference for all multi-agency panels and meetings includes reference to what to do if there is a disagreement
- 8.4. If it has not been possible to resolve professional differences between agencies, relating to safeguarding children, then this can be brought to the attention of the Safeguarding Forum (on behalf of the Executive Group).
- 8.5. The Independent Convenor will consider what support partners require to resolve their differences and may act as an arbitrator/mediator in the case of prolonged or intractable disagreements.
- 8.6. All professionals have a duty to act assertively and proactively to ensure that a child's welfare is the paramount consideration in all professional activity, therefore all professionals must challenge the practice of other professionals where they are concerned that this practice is placing children at risk of harm.

- 8.7. The Executive Group encourages all professionals with concerns about how safeguarding issues are being handled in their own/another organisation to share their concerns. This may include making use of their agencies whistleblowing procedures or contacting the NSPCC's [Whistleblowing Advice Line](#) which offers free advice and support to professionals.

**This document was agreed and signed off by the Brent Safeguarding Partners in June 2019.**

**Chief Executive, London Borough of Brent**

Name..... Signed.....

**Accountable Officer, Brent CCG**

Name..... Signed.....

**Chief Superintendent, North West Basic Command Unit (BCU) Commander,  
Metropolitan Police (Brent, Harrow and Barnet)**

Name..... Signed.....

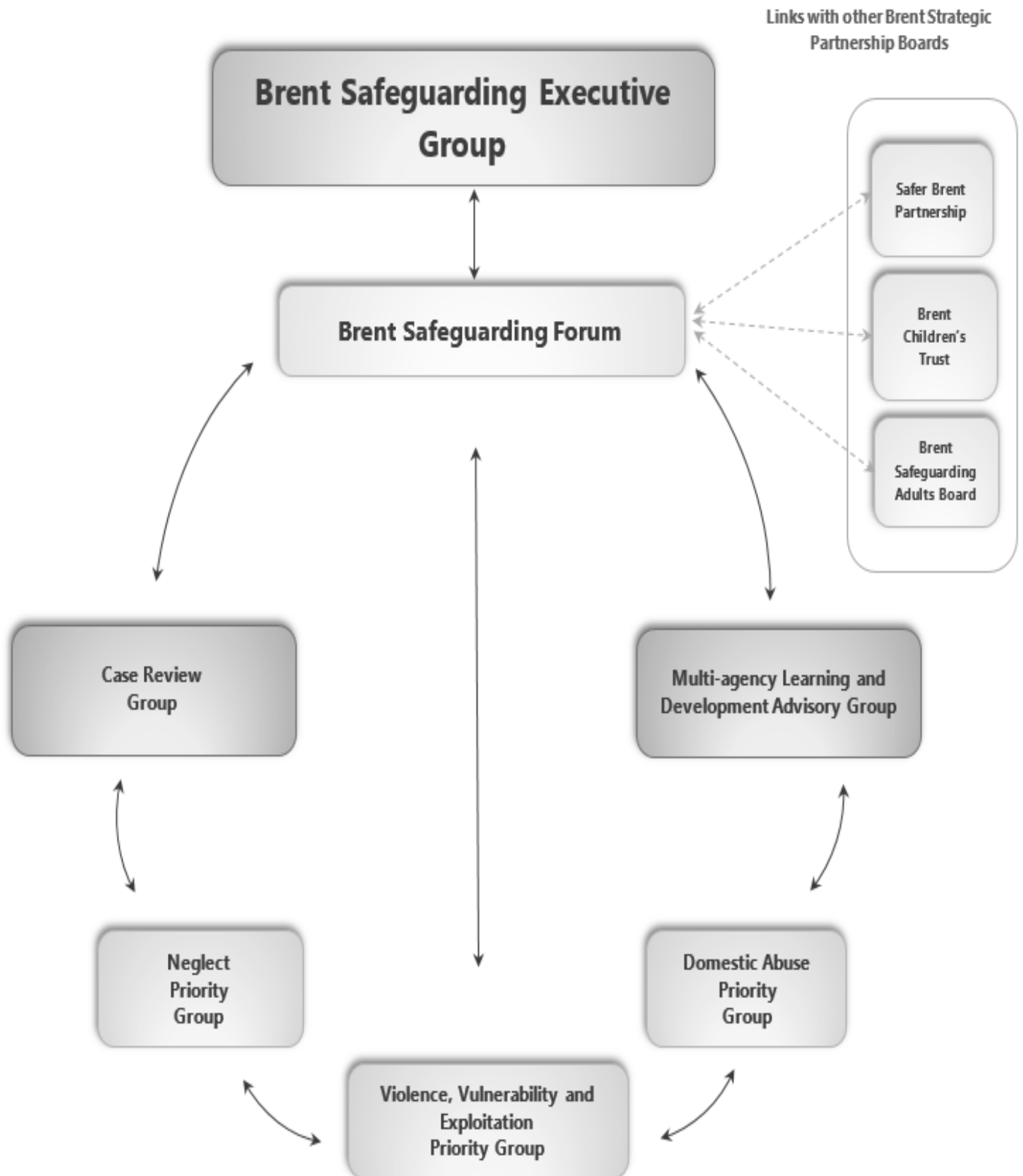
**References**

Child and Social Work Act 2017  
<http://www.legislation.gov.uk/ukpga/2017/16/contents/enacted>


Working Together 2018  
<http://www.workingtogetheronline.co.uk/>

Local Safeguarding Partners Relevant Agencies Regulations 2018  
<http://www.legislation.gov.uk/ukdsi/2018/9780111167540>

# Appendix A





	<b>Cabinet</b> 17 June 2019
	<b>Report from the Strategic Director of Community Wellbeing</b>
<b>Amendments to the Housing Allocation Scheme</b>	

<b>Wards Affected:</b>	All
<b>Key or Non-Key Decision:</b>	Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>No. of Appendices:</b>	Five: <ul style="list-style-type: none"> <li>Appendix 1 – Allocations Scheme Summary</li> <li>Appendix 2 – Online Consultation Results</li> <li>Appendix 3 (a) – BMG Survey (Professionals)</li> <li>Appendix 3 (b) – BMG Survey (Residents)</li> <li>Appendix 4 – Equality Analysis</li> <li>Appendix 5 – Policy on displaced tenants and leaseholders</li> </ul>
<b>Background Papers:</b>	None
<b>Contact Officer:</b>	Laurence Coaker, Head of Housing Needs Laurence.Coaker@brent.gov.uk Tel: 020 8937 2788

## 1. Summary

- 1.1 The council is statutorily obliged to have a scheme for allocating the limited amount of social housing that we have access to. This report recommends changes to that scheme following formal consultation with members, residents and interested organisations and council departments. It is important to note that changes to the allocations scheme do nothing to increase the supply of affordable housing so the intention here is simply to make sure we are making best possible use of what we do have.
- 1.2 The interaction between homelessness, social housing and the private rental market is complex. About a third of households in Brent rent privately and, with rising rents, job insecurity and a welfare system that will leave many worse off, more people are likely to need our help in coming years. The options at our disposal are a small amount of social housing, a Private Sector Rental Offer (PRSO) and, where neither is possible, families are moved into Temporary

Accommodation (TA). Supply of good quality TA is in decline so, increasingly, we are having to place people in annex or B&B accommodation, which is often poor quality and always expensive.

- 1.3 There is no one solution to this problem and we must therefore take every opportunity to increase supply of affordable housing and reduce the number of families in TA – especially annex and B&B – whilst keeping Brent’s communities together and doing our best to ensure anyone who wishes to live in the Borough can do so. This is not an easy task and the conversations throughout the consultation have demonstrated how difficult it is to decide to prioritise some families over others when need is so acute.
- 1.4 The rationale for each of these recommendations is therefore based on whether a particular proposal is likely to increase the supply of affordable housing or reduce reliance on TA. Recommendations are informed by an Equality Impact Assessment which identifies groups who are likely to be disproportionately advantaged/disadvantaged by the proposal and takes account of the consultation response for each proposal.

## **2. Recommendations**

Cabinet resolves:

- 2.1 To approve the following proposed amendments to the current Allocations Scheme:
  - (a) Amendment 3 - Local Lettings Policy – New Accommodation on their current estate as set out in paragraphs 5.29 to 5.37 below;
  - (b) Amendment 4 - Local Lettings Policy – Regeneration Areas as set out in paragraphs 5.38 to 5.44 below;
  - (c) Amendment 5 - Revising Quotas as set out in paragraphs 5.45 to 5.53 below;
  - (d) Amendment 7 - Give appropriate priority for social housing to victims of domestic abuse who are currently living in a refuge or other form of temporary accommodation as set out in paragraphs 5.63 to 5.65 below;
  - (e) Amendment 8 - Policy for Displaced Tenants and Leaseholders in Regeneration Schemes as set out in paragraphs 5.66. to 5.69 below and Appendix 5 to be added as an appendix to the Council’s Allocations Scheme.
- 2.2 Not to approve the following amendment, but review in six months to enable officers to research further into how this proposal would work in practice and examine intended and possible unintended consequences:
  - (i) Amendment 1: Allow for the future introduction of a new nominations agreement with Registered Providers with reasonable rents as set out in paragraphs 5.2 to 5.17 below:

- 2.3 Not to approve the following amendment, but review in two years to understand the impact of the wider activity to increase the supply of other forms of affordable housing:
- (i) Amendment 2 - Allowing households currently in Band D to retain the waiting time they accrued when in a higher band if they become homeless and are placed in TA as set out in paragraphs 5.18 to 5.28 below;
- 2.4 Not to approve the following amendment:
- (i) Amendment 6 -Prioritise Unaffordability as set out in paragraphs 5.54 to 5.61 below.
- 2.5 To note and give due regard to the content of the Equalities Impact Assessments in Appendix 4.
- 2.6 To delegate authority to the Strategic Director Community Wellbeing to implement the proposed changes to the Council's Allocation Scheme as set out in paragraph 2.1 above.

### **3. Background and Context**

- 3.1 The council is statutorily obliged to have a scheme for allocating the limited amount of social housing that we have access to. Brent's scheme was last reviewed following implementation of the Localism Act (2011) and changes came into force in 2014. At this point, Brent made the decision to significantly reduce the number of households who are eligible to bid for social housing. This was to reflect the fact that many thousands of the 19,500 households then on the register stood no realistic chance of being offered one of the approx. 600 social homes that become available each year.
- 3.2 This was an important decision that makes clear that the focus of the allocations policy is on the demand that might realistically be met, rather than the demand that actually exists. The driver was to give households on the register a more realistic sense of the situation and to manage their expectations. Households with the most acute need, e.g. who were homeless, severely overcrowded or whose living situation was inappropriate because of medical need or poor conditions remained in bands A-C and retained the right to bid. Households with a recognised need that was less acute, e.g. overcrowded by one bedroom, were moved into band D. the upshot is that the number of households eligible to bid reduced to about 5,500. A summary of the current Allocation Scheme is attached at Appendix 1.
- 3.3 The interplay between social housing, homelessness and the private rental market is complex. Brent's Allocations Policy can be seen as a supply-side response to a housing crisis that is far larger than the scope of this report. It was felt that a review of the scheme was timely, given Brent's strategic aims of increasing the supply of affordable homes and reducing the number of families

living in TA, particularly poor quality B&B and annex accommodation. These aims exist against a backdrop of ever intensifying demand so we need to make sure we are making the very best use of what we have.

### **Current demand**

- 3.4 There is a huge gap between the number of households eligible to bid for housing and the number of affordable homes that are available. As at 21<sup>st</sup> May 2019, there were 3,298 households in priority Bands A-C on the Council's Housing Register, 2,193 of whom were living in TA. During 2017/18, only 618 units of social housing were available to meet this demand. Not only does the number of homes available fall far short of demand, but the types of homes do not match what is needed. Of the 618 homes, 44% were 1 bed properties, whereas 83% of the demand, in Bands A-C is for family sized accommodation.
- 3.5 Homelessness is on the rise in Brent, as in many other areas. About a third of households in Brent rent privately and, with rising rents, job insecurity and a welfare system that will leave many worse off, more people are likely to need our help in coming years. Since the implementation of the Homelessness Reduction Act 2017, homelessness applications have increased by 52%. Whilst sometimes a suitable PRSO can be found, the supply is insufficient to meet demand, so homeless households have to move into TA whilst they wait for an offer of social housing. Clearly, this not only increases the number of households who are not living in permanent homes, but it puts even more pressure on our limited social housing.

### **Temporary Accommodation**

- 3.6 When the Council accepts a family as homeless, if no suitable PRSO is available the family are moved into TA while they wait for an offer of social housing. TA is privately owned accommodation which is leased by a housing provider, such as a Registered Provider or, indeed, the council. Average leases are 3-5 years and, provided the landlord is willing to renew the lease, households can stay in the accommodation. Brent has a very small amount of TA that it directly leases in this way: approx. 80 units. By far the most TA is leased through Housing Associations Lease Scheme, which is discussed in detail in section 5. Given the huge gap between supply and demand outlined above, homeless households are likely to be in TA for many years, as illustrated below.

*Table 1. Average waiting time for accepted homeless households to secure social housing by bed size*

<b>Year</b>	<b>Average Waiting Time - Band C</b>
<b>2 Bed</b>	<b>9 Years</b>
<b>3 Bed</b>	<b>16 Years</b>
<b>4 Bed</b>	<b>18 Years</b>

- 3.7 The TA market is contracting, which is making it increasingly difficult to find good quality, long-term options for people. The available housing benefit for TA has been frozen whilst market rents have increased in recent years. For example, less than 50% of leases accessed through Housing Associations are now being renewed on expiry, because owners want to receive a rent closer to the market rate. Families are frequently having to move into emergency B&B or annex accommodation when the lease comes to an end while they wait for new TA. Because of the increasing shortage of TA, the new TA is often, unfortunately, in a different part of the Borough or can be outside Brent.
- 3.8 The cost of accessing TA is also increasing. In September 2018 the 3 Housing Associations through whom we access TA increased their management costs by £20 per property per week to manage the existing portfolio at a cost of £1.25M per annum to the Council. The situation with this kind of TA is detailed below in relation to proposal 1.
- 3.9 The shortage of TA means that the Council is increasingly having to use emergency B&B and annex accommodation. This is often poor quality and always expensive, as it is charged at a nightly rate. Over the past two years, the number of families in emergency accommodation has gone from 30 to 121. Officers believe this is a direct consequence of the shortage of good quality TA, particularly through Housing Associations.
- 3.10 There is uncertainty about how the cost of TA will be met in the future. It is primarily met through the Government's Flexible Homelessness Support Grant provided. Between 2017/18 and 2019/20, Brent's allocation reduced from £8.1M to £5.2 and there is uncertainty about future funding levels. If TA levels are not reduced and costs continue to increase, this will put additional pressure on our already stretched General Fund.
- 3.11 To alleviate the pressures above, Brent's priority is to support homeless households to move out of TA into a permanent home as quickly as possible. This is why 70% of available social housing is offered to homeless families living in TA.

***Our response***

- 3.12 There is no one solution to this problem and we must therefore take every opportunity to increase supply of affordable housing and reduce the number of families in TA – especially annex and B&B – whilst doing what we can to keeping Brent's communities together. Brent would like to be able to offer all homeless households a social home but, as described above, our current supply cannot do this, even in the medium term.

- 3.13 In 2015, Cabinet agreed to use the powers under the Localism Act (2011) to enable a PRSO to be used to end a households' homelessness. The private rented sector will need to continue to be part of the solution. In October 2018, Cabinet also agreed to join Capital Letters - a collaborative endeavour between thirteen London Boroughs to procure and manage affordable private rented sector accommodation across London. The collaboration will ensure that Brent is given access to properties within the Borough. The first leases are expected to start in summer.
- 3.14 We are making good progress in reducing the number of families living in TA. Where we were once the council with the highest number in the country, we are now 8th. Given the increasing pressures, we are redoubling our efforts to implement the Temporary Accommodation Reform Plan agreed by Cabinet in 2015 which has so far seen numbers reduced from 2900 to 2193. This is against a backdrop of increasing TA numbers across London. The plan included:
- Focusing on early intervention to prevent homelessness through the Find Your Home scheme
  - Acquiring and developing 180 PRS units through I4B to let to homeless households at Local Housing Allowance rates. To date 190 families have been, rehoused in I4B properties, and
  - Developing council owned land to provide self-contained TA as an alternative to B&B for emergency and short term use, e.g. Knowles house will deliver 90 units of high quality TA.
- 3.15 The Council also has ambitious plans to increase the supply of affordable housing, aiming for 1000 units each year. In addition to the approx. 600 properties that become available annually, we will achieve this through:
- our own building - we have secured £65m of GLA funding which will help us deliver 250 units each year from 2019/20
  - Housing Associations - we are working proactively to shape the market to deliver an additional 250 social units a year
- 3.16 The above means that, in a few years' time, there is every chance of being in a radically different position, where our Allocations Policy does not need to focus so much on reducing TA and we are better able to meet demand.

#### **4. Consultation**

- 4.1 The Allocation Scheme is a statutory document, requiring formal consultation on any proposed changes reflecting a major change in policy. Consultation started in September 2018 and included:

- Pre-scrutiny by Brent's Housing Scrutiny Committee

- Formal public consultation – from 12 November 2018 to 21 January 2019. The online consultation survey was promoted through the Council's website and the Locata home page. Every household currently on the housing register (including Band D) was notified
- Workshops with key stakeholders, including people living in TA, Members, Registered Providers, voluntary sector organisations and relevant council departments (adult social care, children and young people's services and Brent Housing Management). Workshops were an opportunity to go through some of the more technical issues in depth and attendees were invited to submit their views via the online consultation as well
- Two workshops facilitated by bmg Research in March 2019 following close of the Public consultation. The first was for housing professionals and the second with a cross section of residents from across the Borough. The purpose was to further test the proposals, particularly the likely impact on households seeking social housing. The outcome of these workshops is attached at Appendix 3 (a) and 3 (b).

- 4.2 The online consultation received a high number of responses, 4,984 responses when the survey closed on 21 January 2019. Given there had only been 1,178 responses as at 3 January, officers made enquiries to verify the validity of responses received after this date. It was confirmed that 3,743 were submitted in three tranches, in blocks within a few seconds of each other. These responses had identical answers to all questions, except the ethnicity questions which had mixed responses, but predominantly Bangladeshi. 2,279 of these responses identified themselves as Bangladeshi, although the estimated Bangladeshi population in Brent is 1,800 (GLA population projections 2016).
- 4.3 Based on the above, officers have given less weight in the outcome analysis to responses which appear to have been coordinated, and considerably more weight to the 1,241 responses that are considered to be valid. See Appendix 2 for further details. Officers advise that this approach gives proper due regard to the respective responses to the consultation.

## **5. Proposals and Recommendations**

- 5.1 Each of the six proposals is set out below alongside details of the consultation feedback. Recommendations are based on the likely impact of the proposal on Brent's strategic objectives of increasing the supply of social housing and reducing use of TA.

## **Amendment 1 - Introduce a new nominations agreement with Registered Providers**

- 5.2 This proposal suggests that Brent make use of the opportunity to make nominations to Registered Providers for families newly accepted as homeless. The offer would be an Assured Shorthold Tenancies (AST) based on a Reasonable Rent under part 6 of the Housing Act 1996 and would therefore end the homelessness duty for that family.
- 5.3 Brent currently leases almost 1000 units of TA through the Housing Association Leasing Scheme, through which properties are leased from private owners and managed by an RP. Currently, Housing Benefit will only cover 90% of the January 2011 LHA rate. This represents a much lower rent compared to what a landlord could get in the private market. For example, a three bed property in the north of the Borough would attract a rent of £260, compared to £420 on the private market.
- 5.4 We know that landlords are pulling out of the scheme. We have lost a total of 500 properties in the past five years and this rate appears to be increasing, with 91 properties lost in the past six months. When a landlord pulls out of the scheme, the family living in the property are made homeless, unless the landlord is willing to lease the property to the same family as a PRSO. This attracts rent at 100% of LHA level (£312 for a three bed in the north of the Borough). It is extremely rare for this to happen given that the rent is still short of what would be possible on the private market - £420 in this case - and the landlord would need to manage the property themselves.
- 5.5 The most likely outcome is that the family returns to us for help. Our options are then as for any other homeless family, i.e. possibly a PRSO but most likely a return to alternative TA, often via a stay in emergency B&B or annex accommodation until appropriate TA becomes available. The likelihood of needing to use emergency accommodation is much increased given the pressures on TA outlined earlier in this report.
- 5.6 The cost of maintaining our existing HALS portfolio is also increasing. In recent weeks, our main HALS provider (providing approximately 700 of our almost 1000 properties) has informed us that, in order to make the scheme financially viable, an increased management cost totalling almost £1m will be required.
- 5.7 This proposal offers a way to retain a property for use by a homeless family in Brent, albeit one that can be seen to have been designed to favour landlords. Because the property is managed by an RP, a higher rent – so-called Reasonable Rent - can be charged which would be fully covered by Housing Benefit/Universal Credit. This makes it more likely that a landlord would be willing to continue to offer the property for use in this way. This is more than a landlord can get by offering the property as a PRSO, where Housing Benefit/Universal Credit will only cover 100% of LHA rate. For a three bed in



the north of the Borough, this would be £375 compared to a PRSO level of £312.

- 5.8 There are compelling arguments for adopting this proposal, beyond the chance that at least some of the current HALS properties might be retained by landlords able to get a Reasonable Rent. In addition, the two/three-year lease is longer than a typical PRSO and the quality of the property is likely to be good as it is managed by an RP. Reasonable Rents would be another option which, combined with I4B, Capital Letters and the private rented sector, would mean that only families with very specific needs would be reliant on HALS TA.
- 5.9 However, Reasonable Rents is untested. Brent is in a unique position is having so many HALS properties still and we would be the first authority to use Reasonable Rents, with the attendant risks. In particular, there is a risk that the rent is not considered reasonable under Universal Credit and the DWP refers the matter to the Rent Officer. If the Rent Officer considered the rent not to be reasonable, the Council would need to change its policy.
- 5.10 Families living in properties at a Reasonable Rent could become increasingly reliant on benefits. Whilst Housing Benefit/Universal Credit would cover a Reasonable Rent, the gap between this higher rent and, for example, LHA, means that the reliance on benefits is much greater. This is unlikely to mean anything materially to the family because Housing Benefit tapers off based on needs and income and only at a rate of less than 65% of increased income. This means that the contribution to rent from earned income would remain affordable, but clearly places the family in a position of being reliant on benefits. If a family was subject to the Overall Benefit Cap, or had a change in circumstances that made their contribution unaffordable, the Council would support them to find an alternative option: for context, of the 100 families in TA who are subject to the OBC, only 24 are currently in HALS.

### **Recommendation**

- 5.11 There is a strong case for adding Reasonable Rents to our portfolio of options for supporting homeless families, not least the immediate relief of budget pressures of increased HALS management fees and use of emergency accommodation. It would clearly be inappropriate where the rent was unaffordable but has the potential to offer good quality homes to families who, given the current losses in HALS properties, are likely to need to make use of emergency accommodation.
- 5.12 In relation to the strategic objectives by which this paper judges the proposed changes, Reasonable Rents is likely to increase the supply of good quality, affordable properties as landlords are more likely to continue to make the property available because the RP is able to provide them with a rent that is closer to the market. It is also likely to reduce the number of families in TA

because, for some families, a property at Reasonable Rent would be a suitable settled home that prevented the need for the family to live in TA.

- 5.13 57% of the responses to the on-line consultation survey which the Council is giving greater weight to agree with this proposal. The responses which include what appear to be part of a coordinated response and therefore are being given less weight are included in the first page of Appendix 2. The qualitative feedback from the Housing Scrutiny Committee and BMG workshops acknowledged that Reasonable Rents was one way to increase supply of affordable housing.
- 5.14 In terms of the Equality Impact Assessment, the cohort who would be affected by this proposal are newly accepted homeless households. The characteristic profile of this cohort who are currently either going into PRSO or TA accommodation are broadly the same. The exception is households with a disability who generally go into TA because PRSO properties (with the exception of Council owned i4B units) are rarely able to be adapted to meet the needs of the household. Therefore, households with disabilities would generally be allocated TA while they wait for social housing or an i4B adapted property. The full Equality Impact Assessment (EIA) is attached at Appendix 4. The purpose of the allocations scheme is to ensure suitable accommodation is offered to households in priority need based on clear and equitable guidelines. Whilst the "Reasonable Rents" model introduces another option for households to access, for households in need through disability or medical reasons, access will remain the same to social housing either directly or through TA.
- 5.15 Whilst a small majority of the online respondents supported the introduction of Reasonable Rents and the Housing Scrutiny and BMG workshops acknowledged the potential advantages, there are risks with this change.
- 5.16 There are risks with introducing this policy. It is untested, potentially widens the benefit gap for some families and potentially becomes the default option for landlords who want to generate greater income, ultimately making it an unaffordable and unattractive scheme. Most important, it does nothing to prevent a family currently living in HALS from becoming homeless. Even if their landlord converted the property to a Reasonable Rent, this would only apply to a new agreement with a new family.
- 5.17 Discussion subsequent to the consultation have made it clear that a greater level of confidence is needed for this rather technical option to be supported. The recommendation is therefore to continue to investigate how Reasonable Rents would work in practice and examine intended and possible unintended consequences. Officers are recommending that this proposed amendment is revisited in six months for reconsideration when more is known about how this reasonable rents proposal would work in practice and what the intended and possible unintended consequences of introducing this proposal would be. If

officers recommend that this proposal be adopted, this will be submitted to the Cabinet for a decision.

**Amendment 2 - Allowing households currently in Band D to retain the waiting time they accrued when in a higher band if they become homeless and are placed in TA**

- 5.18 As outlined in 3.1 and 3.2 above, changes were made when the allocations scheme was last reviewed that placed households with less acute housing need in band D. These changes affected approximately 14,000 households and the waiting time they had accrued while they were in Band C was retained when they were moved to Band D.
- 5.19 If one of these households subsequently becomes homeless and is placed in TA, they are automatically placed in Band C and given reasonable preference, alongside other families who are accepted as homeless. Their registration date is the date of their placement in TA and they do not retain the waiting time they accrued prior to being moved into band D.
- 5.20 Put simply, this proposed amendment would allow households who were moved from a higher Band to Band D back in 2014 to retain the waiting time accrued in that higher band, along with years accrued subsequently in Band D, if they find themselves homeless and are placed in settled TA (as opposed to stage 1 emergency TA). This is a question raised frequently with officers and it therefore felt important for the integrity of this consultation that it has been included.

**Recommendation**

- 5.21 77% of the responses to the on-line consultation survey which the Council is giving greater weight to agree with this proposal. The responses which include what appear to be part of a coordinated response and therefore are being given less weight are included in the second page of Appendix 2. The feedback from the bmg workshops was generally supportive of the proposal, on the basis that it was considered unfair that households lost the waiting time they had previously accrued.
- 5.22 The Housing Scrutiny Committee acknowledged that, whilst this proposal would benefit households who had lived in the borough longer and previously accrued waiting time in a higher band, it would disadvantage households who had not previously accrued any waiting time. The current allocation scheme prioritises households by need and length of time they have waited with that identified need. Whilst the cohort that would benefit from this amendment would have a recognised need for housing because they have been accepted as homeless, they might be placed above other homeless families with the same need, who have been waiting in TA for longer. For example: a family accepted on to the

Register at Band C in 2009 one bedroom overcrowded, who become homeless in 2019 could be prioritised over a family who were accepted as homeless in Band C (at least 2 bedrooms overcrowded) and had been in TA for the last 4 years.

- 5.23 In terms of the impact of this proposal on the Council's strategic aims, it is neutral in terms of housing supply. It does not have any impact – positive or negative. Analysis of the households moved into Band D in 2014 who have subsequently been accepted by the Council as homeless suggests that the demand would be approximately 125 homeless households annually. This number is, of course, based on data for years when this proposal was not in play. Also, the amendment could not be limited to the cohort who were affected in 2014 but would need to include all households who have been moved into Band D from a higher band since 2014. Approximately 9,000 households have gone into Band D since 2014, although it is not possible to identify how many of these households were previously in a higher band. Officers do not think the number will be high as it is rare for a household to move down a band since the 2014 changes.
- 5.24 There is a risk that this proposal would offer false hope to families in Band D that, should they be accepted as homeless, their opportunities for accessing social housing would increase. Given the incredibly limited current supply of social housing and the already existing demand in Bands A-C, this is highly unlikely. In reality, this change would only have a material impact on the family if the Council was unable to find a suitable PRSO and, as a consequence, the family was placed in settled TA. Given the Council's desire to reduce the use of TA, this change is even less likely to make a difference to the family as alternative sources of affordable PRSO, e.g. through Capital Letters or I4B become more common.
- 5.25 We are committed to reducing our use of TA but it must be acknowledged that both Capital Letters and I4B are in their infancy and have not yet had chance to comprehensively demonstrate delivery of suitable PRSO for our homeless families. A risk exists that this proposal would increase demand on TA should these initiatives prove less effective than anticipated.
- 5.26 The full EIA is attached at Appendix 4. Analysis shows that the characteristic profile of the cohort of households who are currently in Band D, and so would potentially gain if this proposal was implemented is similar to the cohort of people who apply as homeless to the Council. The impact of this proposal is therefore neutral.
- 5.27 For this proposal to be meaningful to families who have been moved into Band D from a higher band, we need to be able to evidence that we are delivering substantial increases in the supply of affordable housing. Otherwise, the risk of giving families currently in Band D false hope is significant and risks these

families perceiving that homelessness would improve their chances of accessing social housing. The only way in which we would be able to support most of these families into a suitable, permanent home is through a PRSO and we do not yet have the track record of improved supply to make this a reality. The proposal would also disadvantage families who have been in TA for a long time compared to people who are currently in Band D as a family in TA is, by default, awaiting a social home and we need to see a step change in delivery if they are to have a realistic chance of a permanent home.

- 5.28 Whilst having regard to the positive response to the online survey and BMG workshops, it is clear that the only way that this proposal would be realistic is with proven delivery of supply, both of social housing for families currently in TA and of PRSO – through Capital Letters and I4B - for families in Band D who find themselves homeless. Officers are therefore proposing that Cabinet reviews this proposal in 2 years' time when the impact of wider activity to increase the supply of all forms of affordable housing is known.

**Amendment 3 - Local Lettings Policy - Give priority to households who need a transfer to bid for new accommodation that becomes available on their current estate**

- 5.29 Building new council homes is disruptive for local people. This proposal suggests a way to make sure that local residents have a real stake in new developments in their area. Council tenants who are registered for a transfer would be given priority to bid for new units that become available on their estate. There are currently 267 Brent Council Tenants who are registered for a management transfer due to overcrowding, medical or other reason and who are in Bands A-C and therefore able to bid.
- 5.30 The Council has ambitious plans to increase the supply of affordable homes, including building new Council homes. Brent is not blessed with swathes of brownfield sites and most of these new homes will be built on under-used available land on existing estates i.e. infill, including through initiatives like demolishing underutilised garages.
- 5.31 For too long, tenants have been expected to put up with the downsides of new developments near them, without getting any of the benefits. This proposal would enable residents to continue to live on their estate and prevent the need for them to move away.

**Recommendation**

- 5.32 84% of the responses to the on-line consultation survey which the Council is giving greater weight to agree with this proposal. The responses which include what appear to be part of a coordinated response and therefore are being given less weight are included in the second page of Appendix 2. Feedback from the

Housing Scrutiny Committee consultation indicated support and included the observation that the proposal could make planning applications to develop Council housing on estates easier and quicker to process. The bmg workshops were also supportive, on the basis that it would contribute to community cohesion and support tenants to remain in the same area as their support network.

- 5.33 In terms of the strategic objective of the Council, the proposal is likely to have a positive impact on supply because it would facilitate the Council's ambitious house building programme. First, by demonstrating that local communities would experience benefits as well as disadvantages and also by encouraging people to move locally into more suitable homes, freeing up the homes they previously lived in.
- 5.34 It must be recognised that, in giving local tenants priority to bid for new units, they are prioritised over other households in the borough, some of whom may have been waiting longer. Whilst the home the tenant previously lived in would become available, most people on the transfer list are overcrowded and so would be unlikely to benefit from the newly vacated home. The Council needs to be mindful not to see developments on existing estates as the only way to provide larger homes. However, a significant number of tenants registered for a transfer are under-occupiers so, by offering them more suitable homes on their estate, their home could be freed up for a larger family.
- 5.35 The proposal would not increase the demand for TA as it only affects households already eligible to bid for a transfer. It would make a small but important contribution to reducing TA as families who move to a new home would no longer be in TA.
- 5.36 The full EIA is attached at Appendix 4. The analysis shows that the 18 households already registered for a transfer and living on an in fill estate are predominately White UK and tend to be older. Whilst the number of eligible households is small, this proposal would enable them to retain their local connections whilst freeing up their previous home for another household.
- 5.37 As both the qualitative and quantitative consultation responses were positive and the proposal contributes to the Council's strategic objectives, it is recommended for adoption. Although it does provide some households with an advantage because new houses are being built on their estate, the impact is relatively small as highlighted in the EIA.

**Amendment 4 - Local Lettings Policy - Give priority to accepted homeless households living in Temporary Accommodation on an estate that is being regenerated, for an allocation of social housing that becomes available on the same estate**

- 5.38 This proposal is similar to the above and would give households in TA priority for an offer of social housing on their estate, if the estate is being regenerated.

### **Recommendation**

- 5.39 55% of the responses to the on-line consultation survey which the Council is giving greater weight to agree with this proposal. The responses which include what appear to be part of a coordinated response and therefore are being given less weight are included in the third page of Appendix 2. The Housing Scrutiny Committee consultation made no comments on this proposal. The bmg workshops were supportive of the proposal, on the basis that it contributes to community cohesion and enables tenants to stay close to their support networks.
- 5.40 Brent is committed to ensuring that estate regeneration happens in the right way, with strong resident support and engagement. This includes resident ballots and is supported by guidance from London's Mayor. Ballots must be open to all residents on the estate, including households who have been living in TA on the estate for over a year, for the purposes of fulfilling the requirements to obtain grant funding from the Mayor of London for regeneration. For many of these households, their TA property has become home and they feel fully part of the local community. This is an opportunity to make sure that they too benefit from any proposed regeneration in their area and are not being asked to support a future in which they have no stake and which is only likely to mean disruption and, potentially, relocation.
- 5.41 In terms of the Council's strategic objectives, it is likely that this proposal would have a positive impact on increased supply. Not only would it give households in TA a meaningful stake in the future of where they live, but it could also drive an increase in social housing generally. The Council would have to ensure sufficient supply to meet the needs of families in TA and, in opening up these options, it is highly likely that additional homes could be developed to offer to families in TA currently living in other parts of the Borough.
- 5.42 This amendment would not increase demand for TA or social housing, as it only affects households who are already living in TA. It must be noted that it would prioritise some households over others. For example, the 229 households living in TA in South Kilburn would be offered permanent homes locally, over families in TA in other parts of the Borough who may have been waiting longer.
- 5.43 The full EIA is attached at Appendix 4. It has only been possible to focus on existing schemes, but it confirms that the households living in TA on the South Kilburn Estate broadly have the same characteristics as other households living in TA, although they tend to be younger with fewer Black African households. We can see from the comparative demographic data that no group is advantaged or disadvantaged in this proposal by their protected characteristics

- 5.44 On the grounds that this proposal was supported through the consultation and contributes to the Council's strategic objectives, it is recommended for adoption.

### **Amendment 5 - Revising Quotas**

- 5.45 The Allocation Scheme currently allows for quotas for access to social housing by the following specific groups:

- **Children leaving Care** - referred by Brent Children and Young People service.
- **Probation Service** - Applicants nominated to Brent Council by the Probation Service to avoid the risk of reoffending and where housing is a particular issue.
- **Children Services** - Existing tenants and non-tenants referred by Brent Social Services where accommodation is needed on grounds of children's welfare e.g. child protection cases.
- **Adult Social Care** - To release supported housing and approved for independent living by Brent Social Services and The Housing Department.
- **Voluntary Sector** – To release supported housing but not known to Adult Social Care, and approved for independent living by Brent Housing Needs.

- 5.46 Officers are of the view that the current quota system results in unintended consequences where alternative sources of suitable housing are not readily considered. The system is not felt to operate in a way which is as effective or responsive as it should be. For many people in these groups, safe and sustainable housing is an important part of their support and this proposal is designed to improve the way social housing is being allocated. This amendment is proposing that we abolish the quota system and instead consider referrals on a case by case basis via the Allocations Panel. This may result in these cohorts being allocated a higher number of social homes than under the quota system.

### **Recommendation**

- 5.47 84% of the responses to the on-line consultation survey to which the Council is giving greater weight to agree with this proposal. The responses which include what appear to be part of a coordinated response and therefore are being given less weight are included in the fourth page of Appendix 2. The Housing Scrutiny Committee recognised a review of quotas was appropriate and that the current



system often resulted in blockages. The bmg workshops were also supportive of the proposal, on the basis that cases would still be able to be considered for an allocation of social housing.

- 5.48 The Council's Children and Young People (CYP) Service submitted a response to the consultation in favour of not abolishing the quota for care leavers. Access to social housing by care leavers in Brent is part of Brent's Local Offer for care leavers, approved by Cabinet in February 2018 and should therefore be preserved. If this proposal is agreed, a Service Level Agreement would be established with CYP guaranteeing access to Social Housing for Care Leavers, along with a shared CYP/Housing Allocation Panel. This recommendation is made on the basis that the Council has a Corporate Parent responsibility and moral and legal duty to promote the welfare of children under section 11 of the Children Act 2004.
- 5.49 This proposal would not have a significant impact on the supply of accommodation, nor on demand or the numbers in TA. The cohorts who will be affected are not in TA and the group who currently benefit most from the quota system are care leavers, whose access to social housing will not be affected as detailed above.
- 5.50 Whilst it is possible that more social homes are allocated to these cohorts in future, numbers are not anticipated to be high. The number allocated over the past three years is 155, of which 121 go to care leavers. In addition, the proposal mostly impacts on one bedroom and studio accommodation of which there is a greater supply.
- 5.51 The quota referral system is based on an area of inequality in the council. Those accessing services from which quota referrals are accepted are often the most vulnerable in society and certain protected characteristics are therefore overrepresented within this group.
- 5.52 The full EIA is attached at Appendix 4. On the basis that alternative arrangements are made for the various cohorts to access social housing, the EIA has confirmed that the impact on these cohorts is neutral.
- 5.53 Although this proposal does not contribute to the Council's strategic objectives it does make better use of the social housing stock that is available and should result in better access to suitable housing for these cohorts. It may also assist to generate voids in supported housing for vulnerable homeless people. The proposal is recommended for adoption.

#### **Amendment 6 - Prioritise Unaffordability**

- 5.54 As mentioned above, the Allocations Scheme is a reflection of the housing need that is likely to be met through supply. It is not intended as a true reflection of

demand which, in an era of rising rents, insecure work and welfare changes, is likely to increase in Brent. We know that many of our residents are struggling and we are frequently asked about whether the housing register should reflect issues of affordability more widely, i.e. whether households dependent on benefits or on low incomes should be given priority and be eligible to bid for social housing.

## Recommendation

- 5.55 68% of the responses to the on-line consultation survey which the Council is giving greater weight to agree with this proposal. The responses which include what appear to be part of a coordinated response and therefore are being given less weight are included in the fourth page Appendix 2. The qualitative Housing Scrutiny Committee acknowledged that, whilst the demand is evident, there is not enough supply to meet current demand and adding a significant new cohort would only raise expectations which could never realistically be met. The bmg workshops reinforced this view, with the majority not in favour.
- 5.56 Around 36,000 households in Brent receive Housing Benefit and the table below gives details of different contribution levels.

*Number of households currently receiving Housing Benefit and making a monthly financial contribution*

Contribution Bands	Number of HB Claims
£0 to £49.99	16065
£50 to £99.99	5323
£100 to £149.99	2278
£150 to £199.99	788
£200 to £249.99	307
£250 to £299.99	133
£300 to £349.99	46
£350 to £399.99	27
£400 to £449.99	10
£450 to £499.99	12
£500 to £600	8
£600 to £700	2
£700 to £800	2
£800 to £900	12
£900 to £1000	12
£1000+	16
No Contribution	11653
Total	36694

- 5.57 In terms of how the proposal impacts on the Council's strategic objectives, it does nothing to increase affordable housing supply but would significantly increase the number of households who would join the housing register who would be able to bid.

- 5.58 For the purposes of the EIA, we have gathered information from housing benefit assessors on those households who are likely to be wholly dependent on benefits and paying a shortfall to their rent. The table shows the number and percentage of current claimants based on the amount of shortfall they are paying per week.

Shortfall banding	Claimants	%
Under £5	98	9%
£5 - £49.99	691	60%
£50 - £99.99	270	23%
over £100	92	8%
<b>Total</b>	<b>1,151</b>	<b>100%</b>

- 5.59 If the above proposal was approved for all households in receipt of HB and who make an additional contribution to their rent, the Housing Register would increase by approximately 25,000 households. If the proposal was approved for just the households who are likely to be wholly dependent on benefits and paying a shortfall to their rent, there would be additional demand of 1,151 households. As these households would be in a lower priority band than other households on the Housing Register (as they have no identified need), the majority of these households will never receive an offer of social housing.
- 5.60 The full EIA is attached at Appendix 4. To assess the impacts of this proposal EIA only considered those households who are likely to be wholly dependent on benefits and paying a shortfall to their rent. households within this cohort tend to be within the 25-64 age range with younger and older groups under represented compared to Brent population and a lower proportion identified as disabled. Black and white ethnicities are over represented in this group while Asian ethnicities are underrepresented compared to the Brent population. However, ethnicity information is unknown for 40% of this group
- 5.61 We are not aware of any other councils who have adopted this approach. On the basis that it is unlikely that any household who joined the housing register on this bases would ever get an offer of social housing, it is recommended that this proposal is not approved.

### **Other Amendments to the Current Allocation Scheme**

- 5.62 Two proposed amendments to the Allocations Scheme were not included in the consultation that took place between November 2018 and January 2019. The first is a statutory requirement and the second was consulted on separately and at a different time to the recent consultation.

**Amendment 7 - Give appropriate priority for social housing to victims of domestic abuse who are currently living in a refuge or other form of temporary accommodation**

5.63 In November 2018, the Government issued new statutory guidance for local authorities to improve access to social housing for victims of domestic abuse. The new guidance is intended to ensure that victims of domestic abuse are able to move into social housing from a refuge or other form of temporary accommodation. The guidance:

- Strongly encourages local authorities to exempt from their residency requirements those who are currently living in a refuge or other form of temporary accommodation having escaped from domestic violence in another local authority area, and
- Sets out how local authorities can give appropriate priority for social housing to those who are currently living in a refuge or other form of temporary accommodation, by applying the homelessness or medical and welfare reasonable preference requirements

**Recommendation**

5.64 The Council is committed to supporting victims of domestic violence. The current Allocation Scheme exempts people currently living in a refuge or other TA after escaping domestic violence in another local authority area from our residency requirements and is therefore compliant with the new guidance.

5.65 It is recommended that the proposal to give appropriate priority for social housing to those who are currently living in a refuge or other form of temporary accommodation, by applying the homelessness or medical and welfare reasonable preference requirements, is approved so that the Allocation Scheme is fully compliant with the new guidance.

**Amendment 8 - Policy for Displaced Tenants and Leaseholders in Regeneration Schemes**

5.66 In November 2017, Cabinet delegated authority to the Strategic Director Community Wellbeing, in consultation with the Lead Member for Housing, to finalise and adopt the policy for displaced tenants and leaseholders in regeneration schemes, after consideration of the responses received in the consultation process. It comes back to Cabinet now on the basis that it is proposed to append it to the amended Allocations Scheme that Cabinet is being asked to approve.

- 5.67 The Estates Regeneration Team completed consultation with leaseholders and tenants in South Kilburn in October 2018, which indicated general support and resulted in no substantial changes to the November 2017 proposed policy.
- 5.68 The proposals which were in the November 2017 Cabinet report in relation to re-housing and providing compensation to displaced tenants and leaseholders in regeneration schemes were as follows:
- (i) That the basic options currently available to tenants and leaseholders will remain part of the menu of options as follows:
    - Market purchase in the regeneration area
    - Market purchase elsewhere
    - Shared ownership on the basis of a minimum purchase of 25% of the equity, funded through the buyback receipt and a contribution from Home Loss payments and, where appropriate, any other capital or savings, with rent payable on the share retained by the council.
  - (ii) That a shared equity option, with no rent payable on the equity retained by the council, should be available subject to a minimum purchase of 50% of the equity. This only applies to resident leaseholders
  - (iii) That a leasehold swap option should be offered, through which a leaseholder can transfer the equity in their current home into a void council property within (provided the property is not scheduled for demolition) or outside the regeneration area.
  - (iv) That, where it would be to the council's advantage or will assist in meeting needs that could otherwise delay a regeneration programme, advance purchase of properties scheduled for demolition should be considered.
  - (v) That, on a similar basis to that proposed in recommendation 2.5, advance payment of Homes Loss and Disturbance compensation should be available to leaseholders and tenants.
  - (vi) That, in limited cases subject to detailed review, reversion to tenancy in acquired private sector property should be offered to leaseholders unable to pursue any other option, with buyback prices based on full market value. This would also be available to other leaseholders or tenants who wish to pursue this option.
  - (vii) That support and advice should be available to vulnerable households to secure supported housing where required, including the option of reversion to tenancy in Extra Care or similar provision where necessary.
  - (viii) That the council should purchase properties tailored to the needs of under-occupiers to release larger homes for renting within existing acquisition programmes. This could include purchase in the private

sector or buy-back from leaseholders of smaller properties seeking to sell.

- (ix) That the council should develop a programme to buy back properties from leaseholders who need to move on grounds of ill-health, disability or vulnerability, offering the full range of options available to displaced leaseholders in regeneration schemes.

### **Recommendation**

- 5.69 Officers recommend that the proposed policy for displaced tenants and leaseholders in regeneration schemes, which is discussed in the November 2017 Cabinet report, is approved and incorporated as an appendix to the amended allocation scheme. A copy of the proposed appendix to the Allocations Scheme is set out in Appendix 5 to this report.

## **6. Summary and conclusions**

- 6.1 The majority of the responses to the on-line consultation survey which the Council is giving greater weight to supported implementation all the proposals in the revised Allocation Scheme. The Housing Scrutiny Committee favoured implemented all proposals, except prioritising affordability (Proposal 6). Members also acknowledged there would be “winners and losers” in relation to retaining years previously accrued on the Housing Register. The majority of the responses from the bmg workshops also agreed with all proposals, except prioritising affordability (Proposal 6).
- 6.2 Having had regard to these views and the EIA, and the positive impact of these proposals on the Council’s strategic objectives of increasing the supply of affordable housing and decreasing use of TA, it is recommended that five of the 8 proposals are implemented as soon as possible:
- Amendment 3 - Local Lettings Policy – New Accommodation on their current estate
  - Amendment 4 - Local Lettings Policy – Regeneration Areas
  - Amendment 5 - Revising Quotas
  - Amendment 7 - Give appropriate priority for social housing to victims of domestic abuse
  - Amendment 8 - Policy for Displaced Tenants and Leaseholders in Regeneration Schemes
- 6.3 This report represents a snapshot in time and, given the real challenges of insufficient supply to meet current demand and huge pressures on availability of good quality and cost effective TA, the Council is not in a position to do all we would like. Whilst the Council is working to significantly increase the supply

of social housing, this will not meet existing and new homelessness demand and the PRS will remain an important part of the picture.

- 6.4 Reducing the number of households in TA is not only important because it provides the best chance of sustainable housing for families in need, but because it allows future reviews of the Allocations Scheme to be conducted in a different context. More radical proposals may well be feasible in a scenario where supply is considerably increased and TA is close to zero.
- 6.5 An understanding of our various efforts to achieve this is needed before more radical decisions might be taken. For example, Cabinet is asked to agree to review and consider again Amendment 2 (Allowing households currently in Band D to retain the waiting time they accrued when in a higher band if they become homeless and are placed in TA) in 2 years' time. We will have a clear idea of the extent to which our own building and development plans and initiatives like Capital Letters and I4B etc. are meeting the supply challenge. The same applies to the recommendation not to agree Amendment 6 (Prioritise Unaffordability) at this point. Whilst it would arguably more accurately reflect the demand for support, it does not represent a demand that could be met by current supply and risks raising expectations for families who would never be offered social housing.
- 6.6 The reality of being able to help as many families as we can to find safe, sustainable homes means that we must continue to consider all options available to us. It is evident that a greater level of understanding on intended and unintended consequences of Amendment 1: using Reasonable Rents to Introducing a new nominations agreement with Registered Providers, is required. This amendment is presented in the context of a context in which we have limited options and where the focus, inevitably, is on managing a far from ideal situation. Officers recommend that this should be revisited as just one other potential option that members wish to make use of in future.

## **7. Financial Implications**

- 7.1 The amendments to the policy recommended relate to the priority for which accommodation should be offered. Therefore, these are unlikely to have a net financial impact, particularly if the overall average tenure in TA remains unchanged.
- 7.2 However, the expectation is that demand for TA will continue with a reducing supply of TA accommodation leading to growing budgetary pressures in future year.
- 7.3 The report highlights in paragraphs 3.14 and 3.15 the activities in place to help manage the TA demand in the medium and long term. However, pressures

remain in the short term which will need to be managed utilising the Flexible Homelessness Support Grant.

- 7.4 Historically, the Flexible Homeless Support Grant (FHSG) has been sufficient for the financial pressures. However, the grant has been cut from £7.8m in 2017/18 to £5.2m in 2019/20. There is increasing uncertainty as to whether the FHSG will continue after 2019/20.

## **8. Legal Implications**

### ***Allocation Scheme***

- 8.1 The requirements regarding allocations schemes are set out in section 166A of the Housing Act 1996 ("the 1996 Act").
- 8.2 Under section 159(1) of the Housing 1996 Act ("the 1996 Act"), it states that for the purposes of Part 6 of the 1996 Act, a local housing authority allocates housing accommodation when it : (i) selects a person to be a secure or introductory tenant of housing accommodation held by them, or (ii) nominates a person to be a secure or introductory tenant of housing accommodation held by another person or (iii) nominates a person to be an assured tenant (this includes an assured shorthold tenant) of housing accommodation held by a private registered provider of social housing or a registered social landlord.
- 8.3 The main requirements regarding allocations schemes are set out in section 166A of the Housing Act 1996 ("the 1996 Act").
- 8.4 Under section 166A (1) of the 1996 Act, every local housing authority (which includes Brent Council) shall have a scheme for determining priorities and as to the procedure to be followed in allocating housing accommodation. The allocations scheme must also include the authority's statement on offering choice of accommodation or how people are offered the opportunity to express their choice.
- 8.5 Section 166A (3) outlines priorities to which the scheme must give reasonable preference. These categories are outlined in detail within the allocation scheme, but in summary they are;
- Homeless households
  - Homeless households in temporary accommodation
  - People living in overcrowded, insanitary or unsatisfactory housing
  - People who need to move on medical or welfare grounds (including any ground relating to a disability)
  - People who need to move to a particular locality within the district where to not move them would cause hardship (to themselves or others)
  - people who are owed a duty by the Council under section 190(2), [i.e. eligible for assistance, homeless, in priority need and intentionally homeless], 193(2) [i.e. eligible for assistance, homeless, in priority need



and not intentionally homeless] or 195(2) [i.e. the prevention duty owed to persons who are eligible for assistance and threatened with homelessness] of the 1996 Act.

Additional preference may be given to any particular category where there is urgent housing need.

- 8.6 The “prevention duty” and the “relief duty” were introduced by the Homelessness Reduction Act 2017 (“the 2017 Act”) and applicants who are owed the prevention duty or the relief duty come within the categories of reasonable preference. The “prevention duty” and “relief duty” apply when a local authority is satisfied that an applicant is homeless and eligible for assistance.
- 8.7 Subject to the content of section 166A (3) of the 1996 Act as set out in the previous paragraph, the allocations scheme may contain provision about the allocation of particular housing accommodation: (a) to a person who makes a specific application for that accommodation; (b) to persons of a particular description (whether or not they are within the categories set out in the previous paragraph). The Secretary of State has the power to make regulations to specify factors which a local housing authority in England must not take into account in allocating housing accommodation.
- 8.8 The allocations scheme must be framed so as to secure that an applicant for an allocation of housing accommodation has the right to request such general information as will enable him to assess - (i) how his application is likely to be treated under the scheme (including in particular whether he is likely to be regarded as a member of a group of people who are to be given a reasonable preference); and (ii) whether housing accommodation appropriate to his needs is likely to be made available to him and, if so, how long it is likely to be before such accommodation becomes available for allocation to him.
- 8.9 The allocations scheme must also be framed so that an applicant for a housing allocation has the right to request the Council to inform him of any decision about the facts of his case which is likely to be, or has been, taken into account in considering whether to allocate housing accommodation to him and he also has the right to request a review of such a decision and to be informed of the decision on the review and the grounds for it. There is also the right to request a review against a decision of the Council by an applicant on grounds of being ineligible for an allocation and of not being a qualifying person to be allowed to be given an allocation of housing under section 160ZA (9) of the 1996 Act.
- 8.10 Under section 166A (12) of the 1996 Act, a local housing authority must, in preparing or modifying their allocation scheme, have regard to: (a) its current homelessness strategy under section 1 of the Homelessness Act 2002, (b) its current tenancy strategy under section 150 of the Localism Act 2011, and (c)

as Brent Council is a London Borough, the London housing strategy prepared by the Mayor of London. These strategies have been considered and given due regard in relation to the proposed amendments to the Council's housing allocations scheme. The Council's homelessness strategy and the Council's tenancy strategy will be reviewed this year and following consultation, the Cabinet will be invited to consider and amend the Council's homelessness and tenancy strategies later this year.

- 8.11 Section 166A (13) of the 1996 Act states that before adopting an allocation scheme, or making an alteration to their scheme reflecting a major change of policy, the Council must -
- a) send a copy of the draft scheme, or proposed alteration, to every private registered provider of social housing and registered social landlord with which They have nomination arrangements (see section 159(4)), and
  - (b) afford those persons a reasonable opportunity to comment on the proposals.

These consultation requirements have been carried out.

- 8.12 Under section 166A (14) of the 1996 Act, a local housing authority shall not allocate housing accommodation except in accordance with their allocation scheme. In other words, if a Council pursues allocation policies that are outside its scheme, then it will be deemed to be unlawful.
- 8.13 Section 160ZA of the 1996 Act sets out which classes of persons that local authorities shall not allocate housing accommodation under their allocations scheme and these are mainly on grounds of immigration status.
- 8.14 The Department for Communities and Local Government (as it was then known) issued statutory guidance in June 2012 and is entitled: "Allocation of accommodation: guidance for local housing authorities in England". The Council has given regard to this statutory guidance when drafting its allocations scheme as the following subsequent statutory guidance including "Providing social housing for local people" dated December 2013 and "Right to Move" dated March 2015. Most recently, MHCLG has issued further statutory guidance in November 2018 "Improving Access to social housing for victims of domestic abuse in refuges or other types of temporary accommodation" which strongly encourages local authorities to exempt from their residency requirements those who are currently living in a refuge or other form of temporary accommodation having escaped from domestic violence in another local authority area and sets out how local authorities can give appropriate priority for social housing to those who are currently living in a refuge or other form of temporary accommodation, by applying the homelessness or medical and welfare reasonable preference requirements.

- 8.15 In relation to the issue as to whether a nomination of an assured tenancy comes within Part 6 of the 1996 Act, it will fall outside Part 6 of the 1996 Act (i.e. outside the Council's Allocations Scheme) if the following conditions apply:
- (a) it involves a direct offer from a private registered provider of social housing; or
  - (b) it involves a nomination in respect of an existing secure or assured registered social landlord tenant (including assured shorthold tenant) unless the following exceptions apply (in which case it is an allocation under Part 6 of the 1996 Act):
    - (i) the nomination relates to a transfer of housing accommodation to a different property; and
    - (ii) the transfer was made at the request of the applicant; and
    - (iii) the Council is satisfied that the existing tenant has a reasonable preference under section 166A (3) of the 1996 Act.
- 8.16 If the Council wishes to make an offer under Part 6 of the 1996 Act to discharge its duty to someone already in temporary accommodation which is secure or assured (including an assured shorthold tenancy), the Council must ensure that all three of the exceptions in section 159(4B) of the 1996 Act apply as set out in sub-paragraphs (i) to (iii) above. If a homeless applicant under Part 7 of the 1996 Act has already been given an assured shorthold tenancy as temporary accommodation, a further grant of an assured shorthold tenancy will not come within Part 6 of the 1996 Act unless the exceptions set out in (i) to (iii) above apply. This restricts to some extent the scope of the Council to make a nomination of housing accommodation with assured shorthold tenancies under Part 6 of the 1996 Act to homeless households who are already in temporary accommodation under Part 7 of the 1996 Act and have assured shorthold tenancies in that temporary accommodation with a registered social landlord or private registered provider of social housing. This paragraph is relevant to the proposal to introduce a new nominations agreement with registered providers and make nominations in respect of assured shorthold tenancies with private registered providers of social housing or registered social landlords under Part 6 of the Housing Act 1996. As stated in paragraph 5.5 above, an offer of accommodation under Part 6 of the Housing Act 1996 must be suitable and affordable for the housing/homelessness applicant in order to discharge the Council's duty to provide temporary accommodation to accepted homeless households under section 193 of the Housing Act 1996
- 8.17 Under section 11 of the Children Act 2004, local authorities must make arrangements for ensuring that their functions are discharged having regard to the need to safeguard and promote the welfare of children.
- 8.18 In relation to the proposed policy for displaced tenants and leaseholders in regeneration schemes, Members are referred to the content of the legal

implications set out in section 8 of the November 2017 Cabinet report, which is set out in Appendix 5.

## **9. Equalities – Public Sector Equality Duty**

- 9.1 The public sector equality duty, as set out in section 149 of the 2010 Act, requires the Council, when exercising its functions, to have “due regard” to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, and to advance equality of opportunity and those who do not share that protected characteristic.
- 9.2 The “protected characteristics” are: age, disability, race (including ethnic or national origins, colour or nationality), religion or belief, sex, sexual orientation, pregnancy and maternity, and gender reassignment. Marriage and civil partnership are also protected characteristics for the purposes of the duty to eliminate discrimination.
- 9.3 Having “due regard” to the need to “advance equality of opportunity” between those who share a protected characteristic and those who do not includes having due regard to the need to remove or minimise disadvantages suffered by them. Due regard must also be had to the need to take steps to meet the needs of such persons where those needs are different from persons who do not have that characteristic, and to encourage those who have a protected characteristic to participate in public life. The steps involved in meeting the needs of disabled persons include steps to take account of the persons’ disabilities. Having due regard to “fostering good relations” involves having due regard to the need to tackle prejudice and promote understanding.
- 9.4 The Council’s duty under section 149 of the Equality Act 2010 is to have “due regard” to the matters set out in relation to equalities when considering and making decisions on the provision of localised council tax support for the area of Brent. Due regard to the need to eliminate discrimination, advance equality and foster good relations must form an integral part of the decision making process. When the decision comes before the Cabinet, Members of the Cabinet must consider the effect that implementing or amending a particular policy will have in relation to equality before making a decision. An Equality Impact Assessment will assist with this and an equality impact assessment is attached to this report.
- 9.5 There is no prescribed manner in which the equality duty must be exercised, though producing an Equality Impact Assessment is the most usual method. The Council must have an adequate evidence base for its decision making. This can be achieved by means including engagement with the public and interest groups and by gathering detail and statistics from the Council’s Housing Register.

- 9.6 Where it is apparent from the analysis of the information that the policy, or amendments to the policy, would have an adverse effect on equality, then adjustments should be made to avoid that effect and this is known as “mitigation”.
- 9.7 The public sector equality duty is not to achieve the objectives or take the steps set out in section 149 of the Equality Act 2010. The duty on the Council is bring these important objectives relating to discrimination into consideration when carrying out its public functions. The phrase “due regard” means the regard that is appropriate in all the particular circumstances in which the Council is carrying out its functions. There must be a proper regard for the goals set out in section 149 of the 2010 Act. At the same time, when the Members of the Cabinet make their decision on amending its allocations scheme, they must also pay regard to countervailing factors which it is proper and reasonable for them to consider. Budgetary pressures and economic and practical factors will often be important. The amount of weight to be placed on the countervailing factors in the decision making process will be for Members of the Cabinet to decide when it makes its final decision.

**Report sign off:**

**PHIL PORTER**

Strategic Director, Community  
Wellbeing

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# Brent

## Allocations Policy Summary

November 2014

**London Borough  
of Brent**

## **Introduction**

The Allocation Scheme was published in 2012, following revisions to the previous Scheme made in line with the Localism Act 2011. This summary incorporates further changes to the Scheme, agreed by the council in November 2014.

The supply of affordable housing in the borough is limited, with the majority provided by Registered Providers (usually referred to as housing associations), who work in partnership with the council to manage and build housing. Although the council and its partners aim to maximise provision of new homes, demand in Brent runs far ahead of supply, meaning that the council must put arrangements in place to manage the way that housing is allocated. This is done through the Housing Register, which allows the council to assess and prioritise applications for housing. The aim of this Scheme is to set out a fair, logical and transparent approach to doing this that complies with the legal requirements set out by government and responds to local circumstances and needs.

## **Who can apply and how does it work?**

The Scheme aims to:

- ✓ Help those in the most housing need
- ✓ Give due priority to those with a long standing attachment to the borough
- ✓ Recognise the contribution of working households

Anyone aged 16 years or over and resident in Brent (see below for more detail) can apply to join the Register. However, owing to the severe shortage of affordable housing, many households who apply will not have any priority under this scheme and therefore will not have any realistic chance of obtaining a home. Those that do not qualify will be offered help to pursue alternative housing options, including private renting and low-cost home ownership options.

The application will include you, your spouse or partner, and the members of your family under 21 years of age who would normally live with you (some exceptions apply and are summarised later). Once your application is accepted, you will be awarded a priority band (A-C) and a priority date if you are considered to have a housing need under the terms of the scheme and meet the other conditions that apply. You will then be able to bid for homes that are advertised by Brent Council and Registered Provider Partners operating in West London. For each advertised property, the applicants that bid are placed in order of priority according to their band and waiting time, and in most cases the highest ranking household will be offered the property.

The Housing Register is reviewed regularly to ensure that it is an accurate representation of demand and does not include households who no longer wish to be considered or who have found alternative solutions. Also, households who no longer qualify under the revised Scheme, or who are not actively bidding on Locata will be advised that their application will be reviewed. In some situations, this may lead to the application being suspended and households will be advised if this is the case.



In line with the powers granted to the council under the Localism Act 2011, the council will normally discharge its duties to households accepted as homeless after 9<sup>th</sup> November 2012 through an offer of suitable private rented accommodation.

## **Qualification Criteria**

### **Residency Rule**

- All applicants must currently be living in the borough and have continuously lived here for a period of 5 years or more prior to joining the register to be eligible. Those who are homeless within the meaning of Part VII of the Housing Act 1996, to whom the London Borough of Brent has accepted a full housing duty will be required to meet the residency criteria prior to being able to bid for properties, or until they meet the average waiting time for the property of the appropriate size, whichever is the shortest time.

### **Exceptions to the residency rule:**

- Existing secure or fixed term tenants of the London Borough of Brent
- Young people leaving care and referred to Brent Council Children's Services and assessed by the panel (whether or not they currently live in Brent)
- Serving and former members or widows of members of the armed forces and reserved forces whether or not they currently live in the borough
- Those residing in supported housing schemes commissioned by the London Borough of Brent
- Persons in prison whose last settled address was in the borough

### **Working Applicants**

Applicants in employment are recognised within the allocation policy and awarded additional priority if:

- At least one adult member of the household is employed
- The employment satisfies the DWP's criteria for claiming Working Tax Credit (or equivalent):
  - 30 hours per week for a single person
  - 16 hours per week for a lone parent
  - 24 hours per week for a couple, where one party must work at least 16 hours
- Employed on a permanent contract: Applicant has been working 9 out of 12 months prior to joining the register, or working 9 out of 12 months at any time that their application is live, and at point of offer of a social home
- Or, employed on temporary contracts or Self Employed: working for 2 years prior to joining the register or at any time that their application is live, and at the point of offer of a social home

An additional 5 years waiting time will be added to the priority date for those who qualify.

### **Asset/Income Threshold**

Household income will be taken into consideration. Applicants at or above the income thresholds for each bedroom category detailed below will not be eligible to join the register as they are deemed to have sufficient financial resources to secure alternative housing.

<b>1 bed need</b>	<b>2 bed need</b>	<b>3 bed need</b>	<b>4 bed+ need</b>
£35,000	£45,000	£55,000	£70,000

Applicants who own their homes in this country or abroad, or with savings of £50,000 and over, are also unlikely to qualify for housing unless there is an extenuating need.

### **Unacceptable behaviour or actions**

Applicants involved in serious anti-social or criminal behaviour they may not be eligible for housing. This includes:

- Being a nuisance or annoyance to neighbours
- Breach of tenancy including illegal or immoral use of the property
- Serious deterioration in the condition of the property resulting from the applicant or a member of their current or prospective household
- The applicant or a member of the household having obtained a tenancy fraudulently.

### **Priority date**

When applicants fall within the same band, priority is determined through their priority date. Initially, an applicant's priority date will correspond to the date they registered to join the housing register. Priority dates may alter when an applicant moves up and down bands or in the case of working households as described above.

### **The Banding system**

All applicants will be assessed and banded according to their housing need.

**Band A: Urgent Need to Move or releasing adapted or larger properties**

**Band B: A need to move**

**Band C: Need to Move - Reasonable Preference but with reduced priority**

Applicants who do not meet the criteria for band A, B or C will not be able to bid for properties on Locata. These applicants will be directed to Brent's targeted housing options website for information about alternative housing options.

BAND A	Qualification criteria
<b>Decants</b>	<p>Brent Council tenants where the property is imminently required (within 9 months) because of lease expiry or for essential work (e.g. redevelopment scheme) as agreed by the Operational Director of Housing and Employment.</p> <p>Brent Council tenants who need to be moved to allow major repairs or full scale rehabilitation/conversion work to be carried out.</p>
<b>Emergency Medical</b>	<p>Emergency banding granted only in exceptional circumstances as recommended by the Medical Officer, when the applicant/tenant or member of their household has a life threatening condition, which is seriously affected by their current housing.</p>
<b>Management Transfer</b>	<p>Agreed in exceptional circumstances by the Allocations Panel due to significant and insurmountable problems associated with a Brent tenant's occupation of a dwelling and there is imminent risk to the tenant or their family if they remain in the dwelling.</p>
<b>Exceptional Social Grounds</b>	<p>Agreed in exceptional circumstances by the Allocations Panel due to significant and insurmountable problems associated with the applicant's occupation of a dwelling and other avenues to housing have been exhausted.</p> <p>This will include Homeless households who are owed a homeless duty by Brent under Housing Act 1996 Part VII section 193(2).</p>
<b>Statutory Duty</b>	<p>Private sector tenants where the Council's Private Housing Services has determined that the property poses a Category 1 Hazard and a Closing Order has been issued. Furthermore, the Allocations Panel is satisfied that there is no alternative solution and that the problem cannot be resolved by the landlord within 9 months.</p>
<b>Social Services (Children in need)</b>	<p>To enable fostering or adoption by Brent residents where agreement has been reached to provide permanent accommodation on the recommendation of the Director of Brent's Children's Services and agreed by the Operational Director of Housing and Employment.</p>
<b>Release Adapted Property</b>	<p>Where a Brent Council or RP tenant is willing to transfer to a suitable non-adapted property and is releasing an adapted property and where the vacant property is given to Brent Council under a reciprocal agreement.</p>
<b>Under occupation Incentive Scheme</b>	<p>Where a Brent Council tenant is willing to move to an alternative property and is giving up one or more bedrooms.</p> <p>Where a RP tenant is resident in Brent under an assured tenancy and is willing to move to smaller accommodation and where the vacant property is given to Brent Council under a reciprocal agreement.</p>
<b>Succession to tenancy</b>	<p>Where succession has occurred and the succeeding tenant is willing to move to alternative smaller accommodation in line with succession policy as agreed by the Allocations Panel.</p>
<b>Housing Register</b>	<p>Urgent need to move agreed by housing in liaison with social services/police/other welfare agency, to give or receive care or support for child protection reasons or other urgent social/welfare reasons as</p>

	assessed and agreed by the Allocations Panel
<b>Former Service Tenants</b>	Council employees who have been a service tenant for at least five years prior to August 1st 1990 and need to be moved from accommodation which goes with the job but who retire due to old age or medical reasons, or who are made redundant as part of a Council decision.

Band B	Qualification criteria
<b>Urgent Medical</b>	An urgent medical need as recommended by the Medical Officer where the current housing of an applicant or a member of the applicant's household is having a major adverse effect on their medical condition. It will not apply where the effect of housing conditions on health is comparatively moderate, slight or variable.
<b>Management Transfer</b>	Agreed in certain circumstances by the Allocations Panel due to fear of violence or reasonable fear of violence, and/or due to exceptional social, educational or economic circumstances associated with a Brent tenant's occupation of a dwelling and there is a serious risk to the tenant or their family if they remain in the dwelling.
<b>Statutory Overcrowding</b>	Where Brent Council tenants have been assessed as being statutorily overcrowded in accordance with Part X of the Housing Act 1985
<b>Stonebridge Regeneration</b>	Tenants of the Stonebridge Regeneration Scheme nominated to the Council through the nominations agreement.
<b>Sheltered Housing</b>	Those who require sheltered housing or designated older person accommodation
<b>Armed Forces</b>	Ex-member of Armed Forces in accordance with regulations
<b>Quota</b>	<p>As agreed under the Quota policy for the following services (employment exceptions may apply):</p> <p><b>Children Leaving Care</b> - Young people referred by Brent Social Services who are unable to make alternative arrangements.</p> <p><b>Probation Service</b> - Applicants nominated to Brent Council by the Probation Service to avoid the risk of reoffending and where housing is a particular issue as judged by the Probation Service in Brent.</p> <p><b>Children Services</b> - Existing tenants and non-tenants referred by Brent Social Services where accommodation is needed on grounds of children's welfare e.g. child protection cases.</p> <p><b>Adult Social Care</b> - To release supported housing and approved for independent living by Brent Social Services and The Housing Department.</p> <p><b>Voluntary Sector</b> – To release supported housing but not known to Adult Social Care, and approved for independent living by Brent StartPlus and Housing Needs.</p> <p><b>Young People</b> in employment or apprenticeships</p>

<b>Band C</b>	<b>Qualification Criteria</b>
<b>Homeless</b>	Homeless households who are owed a homeless duty by Brent who are occupying long term temporary accommodation provided under Housing Act 1996 Part VII section 193(2). Other homeless households where the above duty applies but the customer is not in temporary accommodation.
<b>Qualifying Offer</b>	Households whose acceptance date precedes 9 <sup>th</sup> November 2012, who have voluntarily accepted a Qualifying Offer into the Private Rented Sector bringing an end to the Homeless Duty will retain their Band C and their homeless acceptance date as a priority date.
<b>Severe Overcrowding</b>	Where an applicant is lacking 2 or more bedrooms
<b>Poor conditions</b>	Where a Brent resident is living in poor accommodation and this has been assessed and accepted by the Private Housing Services.

### **Bedroom entitlement**

In order to make the best use of the available housing stock, it is essential to let available properties to those who need that size and type of property. When deciding the size of the property for which applicants are eligible, the standard set out below will be used.

Under this standard, a separate bedroom is allocated to:

- Each married, civil partnership or co-habiting couple
- Any other person aged 21 years or over (that is allowed to be included on the application, except in the case of accepted homeless households where adult children will be expected to share a bedroom with siblings of the same sex).
- Each pair of children or young people aged between 10-20 of the same sex.
- Each pair of children under 10, regardless of their gender
- Any unpaired person aged between 10-20 is paired, if possible with a child under 10 of the same sex, or, if that is not possible, he or she is given a separate bedroom, as is any unpaired child under 10

An applicant's household will only include members of their immediate family who normally live with them (or who would live with them if it were possible for them to do so) or other people who have extenuating need to live with them. Immediate family includes:

- o The applicant

- o The applicant's spouse or partner. Partner means anyone who lives with the applicant as their partner or who would live with them as a couple if they were able to do so
- o Dependant children including children where the applicant has a legal guardianship and children that are adopted or fostered, if they are under the age of 21 and live with the applicant all the time, or for four or more nights every week. The applicant will be required to provide the London Borough of Brent with formal papers upon request (e.g. court order) and documentation relating to any agreement that is currently in place regarding residency.

If there is an extenuating circumstance to include non-dependant adults aged over 21, the applicant will be required to provide further information and evidence about why they need to be considered as part of the household; for example' they are giving/receiving care.

### **Exceptions**

If an applicant has been accepted as statutorily homeless by the London Borough of Brent, a household will include all members who were on the original homelessness application. In these circumstances, adult children will be expected to share a bedroom with a sibling of the same sex regardless of age.

Where an underoccupying social housing tenant is seeking to move to smaller accommodation, adult children may be included on the application.



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## Housing Allocations Scheme on line consultation results

As outlined in section 4 of the attached report, the Council is giving considerably more weight to the 1,241 responses which are not part of the 3,743 responses which appear to have been coordinated. Therefore, the following analysis has been split into two sets of results.

The first set (i) show the outcome with the coordinated results removed, and to which the Council is giving considerably more weight and the second set (ii) includes all responses received, including the 3,743 co-ordinated responses.

■ Strongly Agree ■ Agree ■ Neither Agree or Disagree ■ Disagree ■ Strongly Disagree ■ NULL

1. Do you agree that the council should introduce this new nominations agreement with Registered Providers to offer newly accepted homeless households' accommodation leased through Housing Associations to end the main homelessness duty?

(i)



There were 1,241 responses.

Overall, 57% agree, and 27% disagree.

177 people commented.

(ii)



There were 4,984 responses.

Overall, 14% agree, and 81% disagree.

2. Do you agree that these households should retain the waiting time they had accrued when they were in a higher band?

(i)

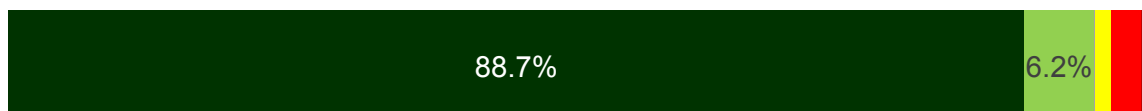


There were 1,097 responses.

Overall 77% people agree, and 18% disagree.

153 people commented.

(ii)



There were 4,840 responses.

Overall 95% people agree, and 4% disagree

3. Do you agree that council tenants who need a transfer should be given priority to bid for properties within their estate?

(i)

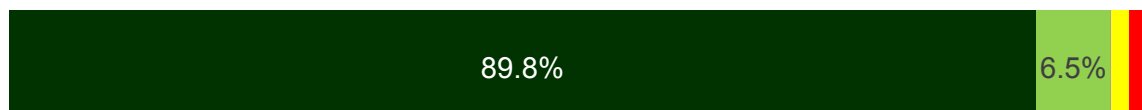


There were 1,125 responses.

Overall 84% people agree, and 12% disagree.

128 people commented.

(ii)



There were 4,868 responses.

Overall 96% people agree, and 3% disagree.

4. Do you agree that approved homeless households residing on an estate undergoing regeneration should be given priority for an allocation of social housing within the same estate?

(i)

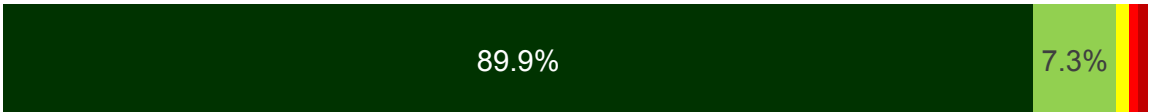


There were 1,091 responses.

Overall 87% agreed, and 8% disagreed.

89 people commented

(ii)



There were 4,833 responses.  
Overall 97% agreed, and 2% disagreed

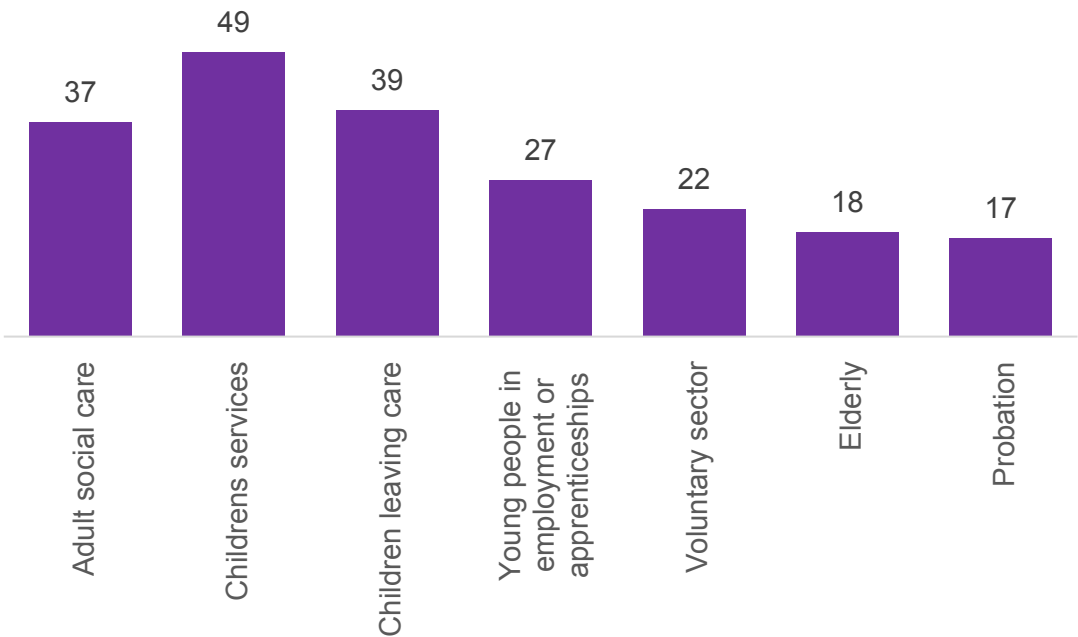
5. Do you agree that we stop using the quota system to allocate social housing to the above categories of clients?

(i)



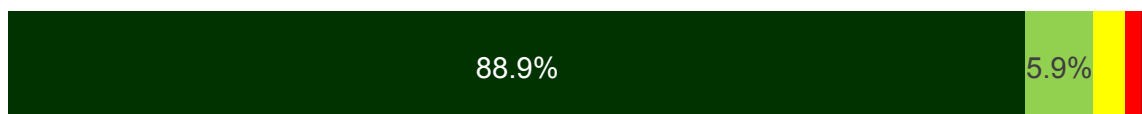
There were 957 responses.  
Overall, 74% agreed, and 21% disagreed.  
79 people commented.

They were then asked which quotas should be kept. 168 people commented and these are the overall results:



A number of other concerns were mentioned, including single parents, those fleeing domestic violence, and mental health. Some people thought each case should be assessed by experts on a case by case basis. Other people thought that the system should not have quotas but be allocated on length of time on list. A number of people thought people on probation should not be allocated housing until their probation was ended, and they had proven they were not going to commit a crime again.

(ii)



There were 4,700 responses.

Overall, 96% agreed, and 4% disagreed.

6. Do you agree that households on low incomes or dependent on benefits who do not have a recognised need for housing should be allowed to bid for social housing?

(i)

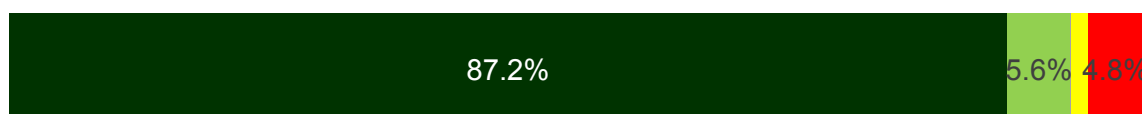


There were 1,110 responses.

Overall, 68% people agree, and 28% disagree.

148 people commented.

(ii)



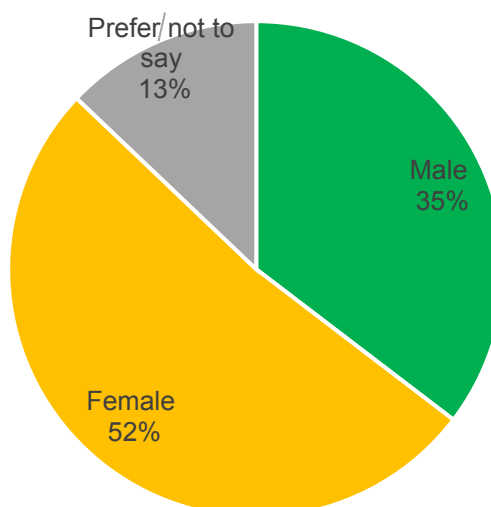
There were 4,852 responses.

Overall, 93% people agree, and 6% disagree.

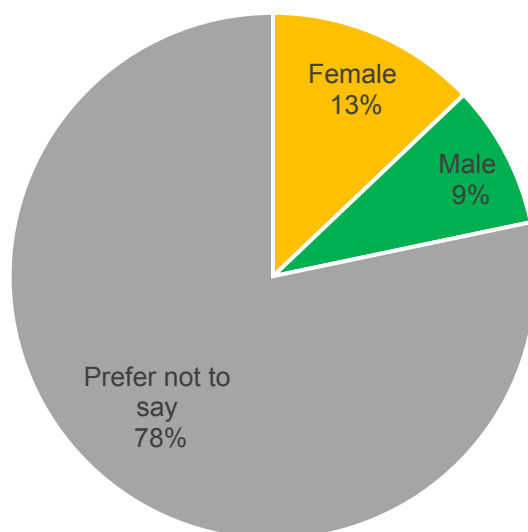
### Who responded?

#### Gender

(i) Just over half the respondents were female.

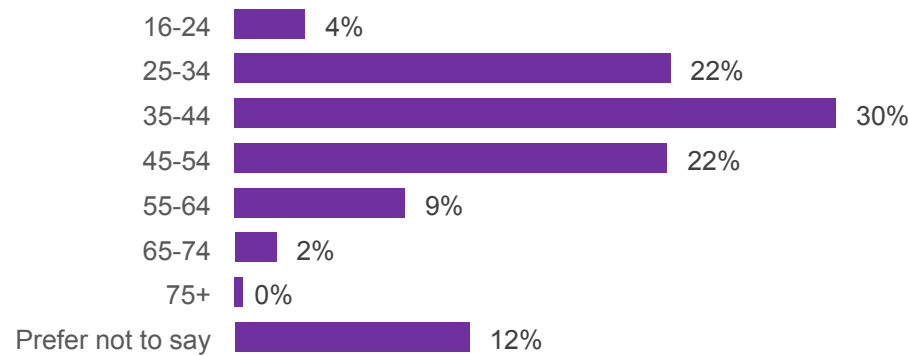


- (ii) Almost all (78%) respondents preferred not to state their gender.

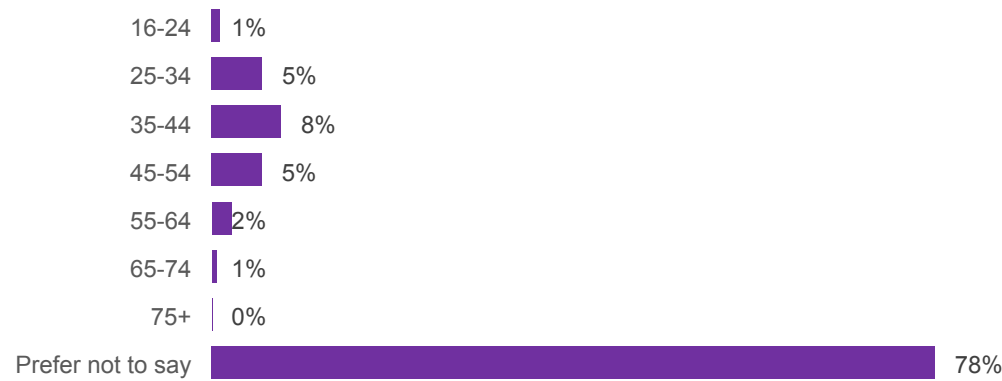


Age

(i) The majority of residents (74%) were aged between 25 and 54.

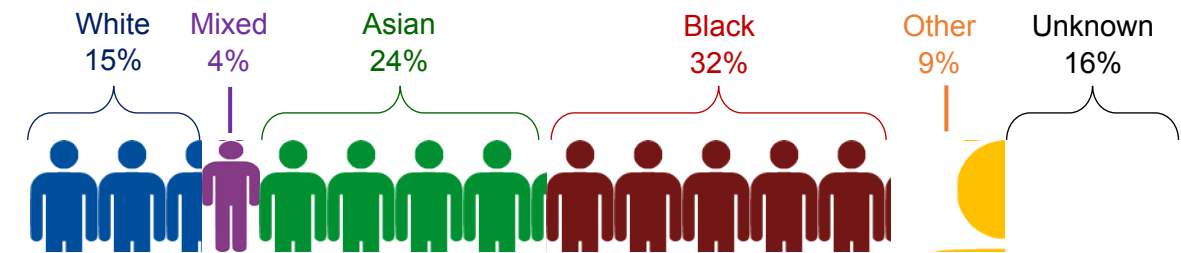


(ii) The majority of residents (78%) preferred not to give their age.

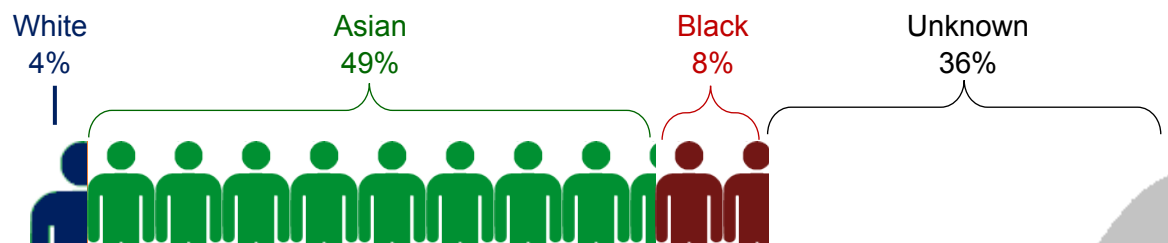


Ethnicity

(i) One in three respondents (32%) were black, and 24% Asian.

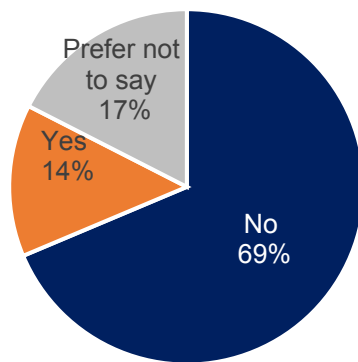


(ii) One in two respondents (49%) were Asian, overall 46% were Bangladeshi.

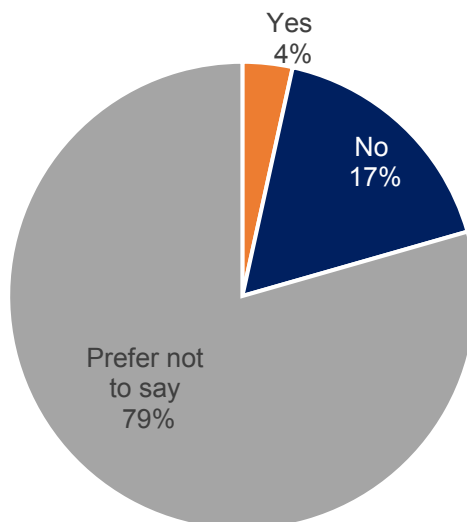


## Disability

- (i) 14% of respondents had a disability.



- (ii) 79% of respondents preferred not to say if they had a disability.



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# Research Report



## Brent Council housing allocation focus group findings - Housing Professionals

Prepared for: Brent Council

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# **Brent Council housing allocation focus group findings - Housing Professionals**

**Prepared for: Brent Council**

**Prepared by: Francis Bolton, Senior Researcher**

**Date: March 2019**

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# 1 Introduction

## 1.1 Background and methodology

In February 2019 Brent Council commissioned BMG Research to carry out two focus groups into proposed changes to the Council's housing allocation policy. This report summarises the findings from a session carried out with housing professionals; the other, with a group of Brent residents, is covered in a separate report. These groups form part of a wider consultation whereby Brent Council is asking for views from a range of stakeholders, such as Adult Social Care and Children and Young People, local councillors, probation services, and people who are on the Housing Register.

The group was carried out on 12<sup>th</sup> March 2019, and was moderated by BMG Research staff. An officer from Brent Council was also present to explain the proposals and to deal with any questions on the detail of the proposals.

Brent Council invited a range of housing professionals to attend, from housing associations that currently work with the Council. Six did so, each representing different housing associations. Job titles of the attendees were as follows:

- Acquisitions and Lease Renewals Manager
- New Business and Leasing Manager, temporary accommodation
- Tenancy Services Officer
- Private Sector Leasing Manager
- Allocations and Lettings Officer
- Available Homes Officer

All bar one of the attendees had already completed an earlier online consultation run by the Council on the proposals.

## 1.2 Note on interpretation of qualitative research and data

It is important to note that findings refer solely to those attending the group, and should not therefore be taken as representative of all housing association stakeholders. Quotations have also been included in the report (in italics, or else in quotation marks where they are incorporated in a body of commentary) to provide evidence for the views and experiences reported (both those that were more common, and minority views). Quotations were selected for inclusion in this report on the basis that they met the following criteria:

- where a quote explains an issue more succinctly than could be otherwise described in the body text; and
- where a quote highlights a key issue discussed by participant in a succinct and clear manner.

For each of the proposals, after discussion a brief 'vote' was held on who was in favour / against the proposal. The findings from the 'vote' are given for each proposal in this

report; again, it should be noted that these findings should not be assumed to be representative of all housing association stakeholders.

## 2 Perceived issues with housing allocations

Before discussing the specific proposals, participants were first of all asked what they consider to be the current main issues in housing allocations and what they think may be issues in the future.

### 2.1 Affordability

The main issue raised was affordability. Several participants referred to 'affordable' rents not being sufficiently affordable; one suggested changing such rents from 80% of the market rent to 60%, whilst accepting that this was unlikely to happen.

One participant stated that households are now being forced to move out of London to obtain affordable rents.

In the context of affordability, one participant stated that in their experience households are tempted to accept properties that they cannot realistically afford, because they have been waiting for permanent accommodation for a long period.

### 2.2 Universal Credit

Welfare reform and specifically Universal Credit was cited by several participants in the context of affordability. One participant referred to the built-in delay in payments for those applying for Universal Credit / switching over from Housing Benefit to UC, and the need for support during this period. Other participants also referred to individuals being trapped in benefits rather than obtaining work.

### 2.3 Supply

To general agreement, one participant referred to lack of supply as a key challenge for allocation policy.

### 2.4 Other issues

One participant stated security of tenure was an issue for those in temporary accommodation, in terms of households not knowing whether the lease would be renewed or how long they would be in temporary accommodation.

One participant was concerned about sharing of risk between housing associations and the Council in relation to the reasonable rent scheme (another participant stated this was not an issue for their organisation).

### 3 Proposal 1: Allow households moved from Band C to Band D to retain the time spent waiting in Bands C / D if they move up to Band C again

#### 3.1 Proposal

The first proposal considered was:

To allow households moved from Band C to Band D to retain the time spent waiting in Bands C / D if they move up to Band C again [currently on moving back up to Band C, their registration date is the date on which they are re-accepted into Band C].

Before the start of discussion, as well as explaining the proposal, context was also provided on the Council's change in policy following the Localism Act, where a large number of households were moved down from Band C to Band D. These households retained the time spent waiting in Band C when moving down a band, and would therefore be affected by the proposal if they moved back up to Band C.

#### 3.2 Summary of opinion

**After discussion, five of the participants were in favour of this proposal whilst one had reservations.**

Apart from general agreement, specific points raised were as follows:

One participant stated their housing association carries out its own banding and therefore did not see the proposal as relevant to them.

A second participant stated they thought the proposal would lead to a 'fairer' allocations policy, and that it would be encouraging for residents affected.

A third participant questioned whether the proposal would be justified in cases where the resident's circumstances had changed; for instance, if time spent on the Housing Register due to a household being overcrowded should 'count' later when the household was no longer overcrowded due to someone leaving the household.

One participant also voiced general concerns about high expectations amongst those trying to access social housing, whilst stating that their comment did not necessarily relate directly to the proposal.



## 4 Proposal 2: Giving priority to households who need a transfer to bid for newly-built accommodation that becomes available on their current estate

### 4.1 Proposal

The second proposal considered was:

Giving priority to households who need a transfer to bid for newly-built accommodation that becomes available on their current estate.

Before the start of discussion, it was explained that this proposal relates to newly-built infill accommodation.

### 4.2 Summary of opinion

**All participants were in favour of the proposal.**

Apart from general agreement, specific points raised were as follows:

One participant supported the proposal on the grounds of community cohesion, giving the examples of children not having to move school, and older people being able to both downsize and stay in the same area.

A further participant was supportive stating that she is aware of complaints from residents having to move area despite suitable new infill housing being built on their estate:

*I think the anger, it's the point that people are making that I'd been a transfer resident for years and years and years waiting for my probably larger property, that's the main reason I think, over-crowding, and I think the anger is when they see new developments being built on their doorstep which would be ideal... that's where we get the angry feedback is, 'Why can't I have that property for goodness' sake, I've been waiting for x number of years'*

A further participant stated that existing residents who have to deal with the disruption of infill housing being built on their estate should be able to benefit from the new housing if they wish. This participant considered that the proposal could help offset the downside of disruption associated with building infill housing in residents' minds, and increase resident buy-in when balloting takes place.

## 5 Proposal 3: Give priority to accepted homeless households living in Temporary Accommodation on an estate that is being regenerated, for an allocation of social housing that becomes available on the same estate

### 5.1 Proposal

The next proposal considered was:

Giving priority to accepted homeless households living in Temporary Accommodation on an estate that is being regenerated, for an allocation of social housing that becomes available on the same estate.

Before the start of discussion, the proposal was explained, with work in South Kilburn cited as an example of the kind of regeneration work covered by this proposal.

### 5.2 Summary of opinion

**All participants were in favour of the proposal.**

Support was expressed for the proposal on the grounds, as with Proposal 2, that it is likely to increase resident support for regeneration schemes when balloted, thereby increasing supply not only to homeless households living on the estate but potentially also for other households not currently living on the estate. South Kilburn regeneration was cited in this context.

*I think that the new supply that will be generated which is over and above the existing will then be available for other people then to access. So you have to look at the whole bigger picture.*

One participant questioned whether the proposal would be fair to households living on a nearby street property, more in need than homeless households on the estate, who nonetheless would not receive the same priority under the new proposal. However, the predominant view was as expressed above, namely that increased supply would result to all households not just on the estate; and this participant 'voted' in favour.

One participant also stated they had heard positive feedback from homeless households now classed as tenants, who were able to pick colour schemes for their new home.

Again mirroring the response to Proposal 2, support was also expressed on the grounds of community cohesion:

*It's good because it's like everybody knows everybody, so it's a nice community.*

*And you feel, 'Right, at least I know who's going to be living next to me,' because people always worry about their neighbours.*

## 6 Proposal 4: Introduce a new nominations agreement with Registered Providers

### 6.1 Proposal

The next proposal considered was:

To introduce a new nominations agreement with Registered Providers (also known as the reasonable rent scheme).

In summary, the Council leases temporary accommodation from private landlords to help meet its homelessness duty. However, the supply of such accommodation is dwindling, as private landlords are increasingly unwilling to renew leases given the rent caps involved. The proposal would enable the Council to lease properties from private landlords as permanent homes, enabling the landlord to obtain a higher rental income. (Such properties would be managed by RPs, as is the case currently for most of the temporary accommodation referred to above).

### 6.2 Summary of opinion

**All participants were in favour of the proposal.**

Participants agreed that much detail would need to be agreed in terms of how risk would be shared between RPs and the Council, whether the new agreement could be put in place with the existing occupant in situ or whether it would need to wait until they moved out, etc. However, participants supported the principle of the proposal. It was seen as a positive way to increase or maintain supply, for example:

*Yes, I think for us to be able to retain stock at the level we've got, let alone grow, we need something like this because... the stock that we already have is dwindling and dwindling and our grasp on the private landlord market within this borough dwindles with that.*

*I think that it definitely seems a good idea to deal with the demand... we can't build our way out of this.*

Another participant saw the proposal as, in principle, “a winner all around” for the Council, landlords, and RPs:

*You're securing possible long-term accommodation for the family while they are not on your discharging duty, they're not on your homeless person list any more. Landlords are getting the benefit of higher rent. Housing associations are getting more stability in their temporary accommodation stock, if you like, as well.*

## 7 Proposal 5: Revising the quota system

### 7.1 Proposal

The next proposal considered was:

To revise the quota system.

It was explained that currently quotas are in place whereby different services have direct access to a capped number of homes for their clients. These services are: Brent Social Services (who have one quota for children leaving care and another quota for other child welfare-related cases); the Probation Service; Adult Social Care; the voluntary sector; and young people in employment or apprenticeships. Under the new proposal, the caps would be removed and nominations considered on a case-by-case basis.

### 7.2 Summary of opinion

**Five participants were in favour of the proposal, the other was 'in the middle'.**

As indicated above the response to this proposal was broadly positive, for example:

*That is a better option because you have a lot of people who have been incarcerated who tend to get a lot of the housing, as it stands now, the one-beds over the last five or six years. Most of the people that I give a tenancy to for, like, somebody's leaving a care home or has been incarcerated or has support needs.*

However, there was recognition that increasing supply of units will be key, as will continuing support for vulnerable tenants, for example:

*The new way sounds better but overall vulnerable residents or tenants, they need continuing support. Because a high percentage of them, we have to evict them because they are just not engaging and they've got no social worker, no support worker. So, this is all fine, but we need to carry on with the support because what's the point in somebody going through all of that, getting a tenancy and within a year they've lost it.*

Specifically, one participant envisaged the need for support increasing as a result of the roll-out of Universal Credit and vulnerable tenants now being responsible for making their own rent payments.

It was also suggested that decisions in such cases were 'big decisions' for a panel of three to take.

## 8 Proposal 6: Prioritise unaffordability

### 8.1 Proposal

The next proposal considered was:

That residents who have no reason to be on the Housing Register other than low income or being dependent on benefits are now allowed to bid for social housing in Brent.

### 8.2 Summary of opinion

**Three participants were against the proposal, two were in favour, and one neither in favour nor against.**

As indicated above, this proposal attracted the most negative, and also most polarised, reaction.

Two participants were in favour because they have a number of one-bedroom hard-to-let properties that could be rented to some of those who would go on to the Housing Register under this proposal. On this basis, benefits were seen for the housing association, in terms of increasing rental income and reducing voids, together with the issues relating to voids (squatting and ASB were specified in this context). Similarly, benefits were seen by these participants for households added to the Housing Register under this proposal, who would now be able to pay below the market rent.

Another participant also stated that whilst they too have one-bedroom properties that are hard to let, “I find myself rejecting a lot of applicants based on affordability because we take into consideration the overall cost of living”.

By contrast, other participants opposed the proposal because they felt that supply was insufficient to meet the needs of those who would join the Register under this proposal. One of these participants stated this would give ‘false hope’ to affected residents and another stated that the proposal could lead to the waiting list becoming ‘never ending’. The latter participant also stated that affected residents ‘don’t have any reason to be on the list’; that some could be in a position to live in a less expensive area; and that some choose to live on benefits.

One participant also described the proposal as ‘judgmental’, in terms of placing households in a band on the basis of their income / dependence on benefits.

## Appendix: Statement of Terms

### **Compliance with International Standards**

BMG complies with the International Standard for Quality Management Systems requirements (ISO 9001:2015) and the International Standard for Market, opinion and social research service requirements (ISO 20252:2012) and The International Standard for Information Security Management (ISO 27001:2013).

### **Interpretation and publication of results**

The interpretation of the results as reported in this document pertain to the research problem and are supported by the empirical findings of this research project and, where applicable, by other data. These interpretations and recommendations are based on empirical findings and are distinguishable from personal views and opinions.

BMG will not publish any part of these results without the written and informed consent of the client.

### **Ethical practice**

BMG promotes ethical practice in research: We conduct our work responsibly and in light of the legal and moral codes of society.

We have a responsibility to maintain high scientific standards in the methods employed in the collection and dissemination of data, in the impartial assessment and dissemination of findings and in the maintenance of standards commensurate with professional integrity.

We recognise we have a duty of care to all those undertaking and participating in research and strive to protect subjects from undue harm arising as a consequence of their participation in research. This requires that subjects' participation should be as fully informed as possible and no group should be disadvantaged by routinely being excluded from consideration. All adequate steps shall be taken by both agency and client to ensure that the identity of each respondent participating in the research is protected.



With more than 25 years' experience, BMG Research has established a strong reputation for delivering high quality research and consultancy.

BMG serves both the public and the private sector, providing market and customer insight which is vital in the development of plans, the support of campaigns and the evaluation of performance.

Innovation and development is very much at the heart of our business, and considerable attention is paid to the utilisation of the most up to date technologies and information systems to ensure that market and customer intelligence is widely shared.





# Research Report



## Brent Council housing allocation focus group findings - Residents

Prepared for: Brent Council

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# **Brent Council housing allocation focus group findings - Residents**

**Prepared for: Brent Council**

**Prepared by: Francis Bolton, Senior Researcher**

**Date: March 2019**

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# 1 Introduction

## 1.1 Background and methodology

In February 2019 Brent Council commissioned BMG Research to carry out two focus groups into proposed changes to the Council's housing allocation policy. This report summarises the findings from a session carried out with Brent residents; the other, with a group of housing association representatives, is covered in a separate report. These groups form part of a wider consultation whereby Brent Council is asking for views from a range of stakeholders, such as Adult Social Care and Children and Young People, local councillors, probation services, and people who are on the Housing Register.

The group was carried out on 12<sup>th</sup> March 2019, and was moderated by BMG Research staff. An officer from Brent Council was also present to explain the proposals and to deal with any questions on the detail of the proposals.

BMG recruited ten participants. All were Brent residents and aged 16 or over. Recruitment criteria were set to ensure the group was representative of the Borough in terms of gender, age group, and ethnicity. An incentive of £50 in cash was paid to all attending.

## 1.2 Note on interpretation of qualitative research and data

It is important to note that findings refer solely to those attending the group, and should not therefore be taken as representative of Brent residents as a whole. Quotations have also been included in the report (in italics, or else in quotation marks where they are incorporated in a body of commentary) to provide evidence for the views and experiences reported (both those that were more common, and minority views). Quotations were selected for inclusion in this report on the basis that they met the following criteria:

- where a quote explains an issue more succinctly than could be otherwise described in the body text; and
- where a quote highlights a key issue discussed by participant in a succinct and clear manner.

For each of the proposals, after discussion a brief 'vote' was held on who was in favour / against the proposal. The findings from the 'vote' are given for each proposal in this report; again, it should be noted that these findings should not be assumed to be representative of all Brent residents.

## 2 Perceived issues with housing allocations

As a warm-up exercise and to get participants thinking about the many competing priorities in housing allocations, participants were shown a simplified list of the criteria the Council uses. They were asked to consider these and then select the three criteria they consider most important, and the three least important, before discussing their choices as one group.

### 2.1 Top priorities

In terms of top priorities, whilst a range of criteria were chosen the most-selected criteria were homelessness and fear of violence. One participant explained their selection of homelessness in these terms:

*I just thought that if there's nowhere for someone, or a person or family to go, then they're in desperate times so they need some kind of help.*

Other participants explained their selection of fear of violence as follows:

*There is no support for the people to come out about it. So, I think violence from me, I think that's one of the top ones.*

*We want our children to be safe so we don't want the violence on the streets, it's not safe for the other people. That's the reason you are barring those people.*

### 2.2 Least important priorities

In terms of least important priorities, whilst a range of criteria were chosen the most-selected criteria were a recommendation from the Probation Service and Young people in employment / apprenticeships. More than one participant commented on the difficulty of selecting these criteria, and none stated that their chosen groups were undeserving.

Participants selecting Probation Service referrals spoke in these terms:

*I don't know anyone's individual circumstances so can't judge but I just feel like if there were people above them, either people who are in fear of violence or their child or something, I just feel like they have more and greater need than somebody who might have come out of jail or something.*

*If somebody's done a crime and served their sentence, then they shouldn't be punished by making them more disadvantaged when they come into the housing. However, there are just higher needs than maybe that. So, if you can make it a hierarchical stay on who gets what, they would come down to the bottom.*

Participants selecting Young people in employment / apprenticeships spoke in these terms:

*It's really difficult because we'd like them all to be at the top, but I think there are people that should be getting it before them. They could still be staying at home with their parents.*

*They are in employment and they are earning the money that they can afford. They are the young people so they have a life to live. So, they're going to earn. They're going to work longer.*

### 3 Proposal 1: Allow households moved from Band C to Band D to retain the time spent waiting in Bands C / D if they move up to Band C again

#### 3.1 Proposal

The first proposal considered was:

***To allow households moved from Band C to Band D to retain the time spent waiting in Bands C / D if they move up to Band C again [currently on moving back up to Band C, their registration date is the date on which they are re-accepted into Band C].***

Before the start of discussion, as well as explaining the proposal, context was also provided on the Council's change in policy following the Localism Act, where a large number of households were moved down from Band C to Band D. These households retained the time spent waiting in Band C when moving down a band, and would therefore be affected by the proposal if they moved back up to Band C.

#### 3.2 Summary of opinion

**Seven of the participants were in favour of this proposal whilst two were opposed and one undecided.**

The reason most cited for favouring the proposal was fairness. Two participants in particular made the point that the change in policy mentioned above was a Council decision rather than any change in individual households' actions or circumstances – one stating that the Council had 'moved the goalposts'. These participants therefore considered that it would be fair for affected households not to lose accrued time as a result.

An opposing view was expressed by one participant who considered that the proposal might encourage households to make themselves homeless in order to move into Band C. Another participant accepted this as a possibility but still favoured the proposal:

*I think even if there are the odd people that abuse the system, I think on the whole I would be in favour of that, because you keep the years. I mean, there's people abusing every system.*

Another participant believed the proposal would be unfair to those already in Band C.



## 4 Proposal 2: Giving priority to households who need a transfer to bid for newly-built accommodation that becomes available on their current estate

### 4.1 Proposal

The second proposal considered was:

***Giving priority to households who need a transfer to bid for newly-built accommodation that becomes available on their current estate.***

Before the start of discussion, it was explained that this proposal relates to newly-built infill accommodation; and that the proposal could mean greater buy-in from residents on the estate and thereby increase the chance of the development taking place. Example cases where households might need a transfer were given – where a growing family needs an extra bedroom or where older residents can no longer manage the stairs in their property.

### 4.2 Summary of opinion

**Seven participants were in favour of the proposal whilst three were opposed.**

Support for the proposal was mainly based on the perceived benefits in terms of community cohesion. (By contrast, no participant commented on the impact of the proposal on resident ballot outcomes). One participant described the proposal as ‘a fabulous idea’, going on to elaborate:

*If you’ve been on an estate for years, it’s your community. It’s your home. Your doctor’s there, your school’s there, your pub’s there... Why should you move out somewhere else, a distant far-away borough, when you live there and your kids go to school there. Hospital’s there, doctor’s there. It makes sense to me that you should be moved to a larger or smaller flat within that estate.*

Another participant agreed for similar reasons, referring to the need to avoid disruption to children’s schooling and for older people not to lose touch with friends. A further participant referred to the need for older people to keep their existing GP.

Conversely, one participant, whilst in favour of infill housing, opposed the proposal because giving existing households the opportunity to upsize to properties with more bedrooms on the same estate would restrict opportunities for other households not living on the estate. On a similar theme, another participant stated that overcrowding should not necessarily make households a priority and that households should consider their circumstances before getting to the point of overcrowding. (This participant also stated that keeping communities together would in fact be a negative outcome in cases where gangs live in close proximity on the estate).

However, another participant argued that the reverse might also be the case under this proposal, with some residents wishing to downsize and thereby freeing up larger properties.

## **5 Proposal 3: Give priority to accepted homeless households living in Temporary Accommodation on an estate that is being regenerated, for an allocation of social housing that becomes available on the same estate**

### **5.1 Proposal**

The next proposal considered was:

***Giving priority to accepted homeless households living in Temporary Accommodation on an estate that is being regenerated, for an allocation of social housing that becomes available on the same estate.***

Before the start of discussion, the proposal was explained, with work in South Kilburn cited as an example of the kind of regeneration work covered by this proposal. It was explained that in many cases such homeless households would already have been living on the estate for years and be eligible to vote in the regeneration ballot. Again, it was pointed out that the proposal might mean greater resident buy-in to the proposals. It was also pointed out that regeneration gives the opportunity to make better use of the existing space and hence create more homes.

### **5.2 Summary of opinion**

**Eight participants were in favour of the proposal, one was opposed, and one was unsure.**

Some participants favoured the proposal because they considered it would increase the amount of housing, although again without explicitly linking this to any impact of the proposal on ballot outcomes. One also stated that it would relieve the pressure on supply of temporary accommodation.

The other main category of support for the proposal centred on the benefits for those in temporary accommodation. Two participants believed that the prospect of permanent accommodation would bring stability and structure for tenants of temporary accommodation. Another participant believed the proposal would be fair because tenants of temporary accommodation should get something back having had their home demolished.

The participant opposing this proposal stated that it would be unfair to households who were in temporary accommodation but not lucky enough to be living on an estate where regeneration activity was to take place.

## 6 Proposal 4: Introduce a new nominations agreement with Registered Providers

### 6.1 Proposal

The next proposal considered was:

***To introduce a new nominations agreement with Registered Providers (also known as the reasonable rent scheme).***

In summary, the Council leases temporary accommodation from private landlords to help meet its homelessness duty. However, the supply of such accommodation is dwindling, as private landlords are increasingly unwilling to renew leases given the rent caps involved. The proposal would enable the Council to lease properties from private landlords as permanent homes, enabling the landlord to obtain a higher rental income. (Such properties would be managed by RPs, as is the case currently for most of the temporary accommodation referred to above).

This context, and the possible benefits of the scheme, was explained to participants.

### 6.2 Summary of opinion

**Six participants favoured the proposal, two were opposed, and two were unsure.**

Of those giving specific feedback, two participants favoured the proposal as it offered a better deal for private landlords, in terms of higher rental income and a longer lease. One stated that he could see the benefits to landlords of having their property managed by a housing association for a long period:

*I've been gone away for five years and forget about it. I've got X amount coming in and the maintenance, which comes to, like, a lot of money every year. The water, the heating, the gas, everything. That's all taken care of.*

A further participant opposed the proposal because they saw it as 'a short-term solution, not a permanent solution'; on the basis that the landlord can still decide not to renew the lease. This lack of certainty was also cited as a disadvantage for the housing association and the Council.

One participant was sceptical of the benefits to private landlords of leasing their property to the Council, having heard of an instance locally 'quite a few years ago' where Brent Council had failed to support one of their landlords whose tenants had stopped paying their rent and the process of eviction lasted two years.

## 7 Proposal 5: Revising the quota system

### 7.1 Proposal

The next proposal considered was:

***To revise the quota system.***

It was explained that currently quotas are in place whereby different services have direct access to a capped number of homes for their clients. These services are: Brent Social Services (who have one quota for children leaving care and another quota for other child welfare-related cases); the Probation Service; Adult Social Care; the voluntary sector; and young people in employment or apprenticeships. Under the new proposal, the caps would be removed and nominations considered on a case-by-case basis.

Before discussion started, information was provided on how the new system would work, with a panel assessing cases on the basis referred to above. By way of context, it was explained that the current system, by offering the possibility of a 'golden ticket' to social housing, encourages individuals to stay in their supported housing rather than moving on into the private sector. This clogs up the system and exacerbates the shortage of supported accommodation in Brent.

### 7.2 Summary of opinion

**Nine participants were in favour of the proposal whilst one was opposed.**

Of those giving specific feedback, two participants liked the idea of a panel considering nominations on a case by case basis. (One of these participants felt that cases should be reviewed annually to check that there is still a need for social housing).

One participant opposed the proposal. Referring to the 'golden ticket' argument above, they felt that the chance of getting a home under the current quota system was so remote that it was unlikely to function as an incentive to remain in supported housing.

## 8 Proposal 6: Prioritise unaffordability

### 8.1 Proposal

The next proposal considered was:

***That residents who have no reason to be on the Housing Register other than low income or being dependent on benefits are now allowed to bid for social housing in Brent.***

Before discussion began, context was provided on the high rents residents on low income / dependent on benefits have to pay in the private sector; and on the fact that the proposal would mean an additional 20,000 households could be added to an already crowded Housing Register as a result of the proposal.

### 8.2 Summary of opinion

**Two participants were in favour of the proposal whilst eight were opposed.**

As indicated above, this proposal attracted the most negative reaction of all the proposals under consideration. Of those giving specific feedback, four stated they believed that they believed it would be ill-advised to add further households to the Housing Register, for example:

*I just feel that there are so many people waiting to go on, you know, for a council house or social housing. To add another band of residents just seems a bit crazy.*

*I think figures are already so high as it is... there are people that need it more, I think.*

Linked to this view, another participant felt the proposal was too wide, and that the Council should focus on giving essential workers access to the Housing Register instead (referring to the NHS and the armed forces).

Another participant opposed the proposal because:

*I felt that it could possibly encourage those on low incomes and benefits not to want to improve their circumstances.*

Conversely, another participant favoured the proposal on the basis that it would provide encouragement to low-income households to work rather than be unemployed and reliant on benefits.

## Appendix: Statement of Terms

### **Compliance with International Standards**

BMG complies with the International Standard for Quality Management Systems requirements (ISO 9001:2015) and the International Standard for Market, opinion and social research service requirements (ISO 20252:2012) and The International Standard for Information Security Management (ISO 27001:2013).

### **Interpretation and publication of results**

The interpretation of the results as reported in this document pertain to the research problem and are supported by the empirical findings of this research project and, where applicable, by other data. These interpretations and recommendations are based on empirical findings and are distinguishable from personal views and opinions.

BMG will not publish any part of these results without the written and informed consent of the client.

### **Ethical practice**

BMG promotes ethical practice in research: We conduct our work responsibly and in light of the legal and moral codes of society.

We have a responsibility to maintain high scientific standards in the methods employed in the collection and dissemination of data, in the impartial assessment and dissemination of findings and in the maintenance of standards commensurate with professional integrity.

We recognise we have a duty of care to all those undertaking and participating in research and strive to protect subjects from undue harm arising as a consequence of their participation in research. This requires that subjects' participation should be as fully informed as possible and no group should be disadvantaged by routinely being excluded from consideration. All adequate steps shall be taken by both agency and client to ensure that the identity of each respondent participating in the research is protected.



With more than 25 years' experience, BMG Research has established a strong reputation for delivering high quality research and consultancy.

BMG serves both the public and the private sector, providing market and customer insight which is vital in the development of plans, the support of campaigns and the evaluation of performance.

Innovation and development is very much at the heart of our business, and considerable attention is paid to the utilisation of the most up to date technologies and information systems to ensure that market and customer intelligence is widely shared.





## EQUALITY ANALYSIS (EA)

### Proposal 1 - Reasonable Rents

<b>POLICY/PROPOSAL:</b>	Brent Equality Analysis - Introduce a new nominations agreement with Registered Providers
<b>DEPARTMENT:</b>	Community Wellbeing
<b>TEAM:</b>	Housing Needs
<b>LEAD OFFICER:</b>	Omari Gayle
<b>DATE:</b>	24/04/2019

### SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

As there is an insufficient supply of affordable housing to meet demand, the Council is working to increase all forms of housing supply. This proposal is to implement a policy to offer newly accepted homeless households' accommodation with Assured Shorthold Tenancies (AST) from a Registered Provider (RP) / Registered Social Landlord pursuant to Part 6 of the Housing Act 1996 under the Council's revised allocations scheme (if approved by Cabinet) to end the main homelessness duty.

Under this proposal, the Council will work with RPs to nominate homeless families to accommodation with ASTs that the RP will lease from private owners by offering a more competitive 'Reasonable Rent' through a nominations agreement.

This is not currently possible if the accommodation is classified as TA or for homelessness prevention (where Housing Benefit will only cover 90% of the January 2011 LHA rate). It is also not possible for Private Rented Sector Offers (PRSOs) into RP leased accommodation (where HB and Universal Credit (UC) will only pay 100% of the current LHA rate).

However, if an offer of an AST from a Registered Provider / Registered Social Landlord pursuant to Part 6 of the Housing Act 1996 is made in order to end the main homelessness duty or the relief duty, then a Reasonable Rent charged by an RP can be charged and fully reclaimed from HB or UC.

This would not be classified as TA and so accommodating households through a Part 6 offer would also have the effect of substantially reducing the number of households living in TA. It should be added that such an offer of accommodation under Part 6 of the Housing Act 1996 must be suitable and affordable for the housing applicant in order to discharge the Council's duty to provide temporary accommodation to accepted homeless households under section 193 of the Housing Act 1996. Practically this will not be used for homeless applicants who have already been placed in assured shorthold tenancies in temporary accommodation with a registered social landlord or private registered provider of social housing as temporary accommodation under Part 7 of the 1996 Act. In practice, this proposal will be implemented for newly accepted homeless households. Officers have considered the content of the

Council's Tenancy Strategy, which currently recommends to registered providers of social housing grant that the norm for a fixed term tenancy should be five years but with shorter and/or longer periods for specified groups/circumstances and with Introductory or starter tenancies to be for a term of 12 months. Officers submit that the Council's tenancy strategy is being reviewed and changes thereto will go out for consultation and then submitted to Cabinet for a decision. Officers advise that this proposal will be covered in the Council's revised tenancy strategy.

The Council could expect to immediately avoid cost as a result of not paying the £70.00 PW management fee currently charged by RP's under the HALS scheme, as well as from reduced use of B&B and Annex accommodation.

**2. Who may be affected by this policy or proposal?**

This proposal may affect homeless households who the council accepts the main homelessness duty to, under homelessness legislation. This means the Council has a statutory duty to secure these households suitable accommodation.

In the past three years, the council has accepted the main homelessness duty to 1,848 households from 01 April 2015 to 31 March 2018. This is an average of approximately 600 per year.

However, since April 2018 the average number of households that the Council has accepted the main homelessness duty to has reduced to an average of 30 households per month or approximately 400 per year, significantly less than previous years due to changes introduced through the Homelessness Reduction Act 2017, which introduced a statutory duty to prevent and relieve homelessness.

**3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.**

Yes, there is relevance to equality and the council's public sector equality duty as within the cohort of people accessing this service some protected groups are over-represented compared to the borough as a whole.

This is due to the criteria through which priority need is established under the relevant legislation: for example, a household may be regarded as being in priority need owing to age, to a physical disability or mental health condition or to pregnancy. It is also an effect of poverty and disadvantage: some ethnic groups, for example Black Africans, are over-represented among homeless households. Black Africans make up 21% of current accepted homeless households compared to 7.9% in the wider borough.

(Source: 2016 population from GLA)

**4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.**

Characteristic	IMPACT		
	Positive	Neutral/None	Negative

Age		<b>X</b>	
Sex		<b>X</b>	
Race		<b>X</b>	
Disability	<b>X</b>		<b>X</b>
Sexual orientation		<b>X</b>	
Gender reassignment		<b>X</b>	
Religion or belief		<b>X</b>	
Pregnancy or maternity		<b>X</b>	
Marriage		<b>X</b>	

5. Please complete **each row** of the checklist with an “X”.

<b>SCREENING CHECKLIST</b>		
	<b>YES</b>	<b>NO</b>
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	<b>X</b>	
Does the policy or proposal relate to an area with known inequalities?	<b>X</b>	
Would the policy or proposal change or remove services used by vulnerable groups of people?	<b>X</b>	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	<b>X</b>	
<b>If you have answered YES to ANY of the above, then proceed to section B.</b> <b>If you have answered NO to ALL of the above, then proceed straight to section D.</b>		

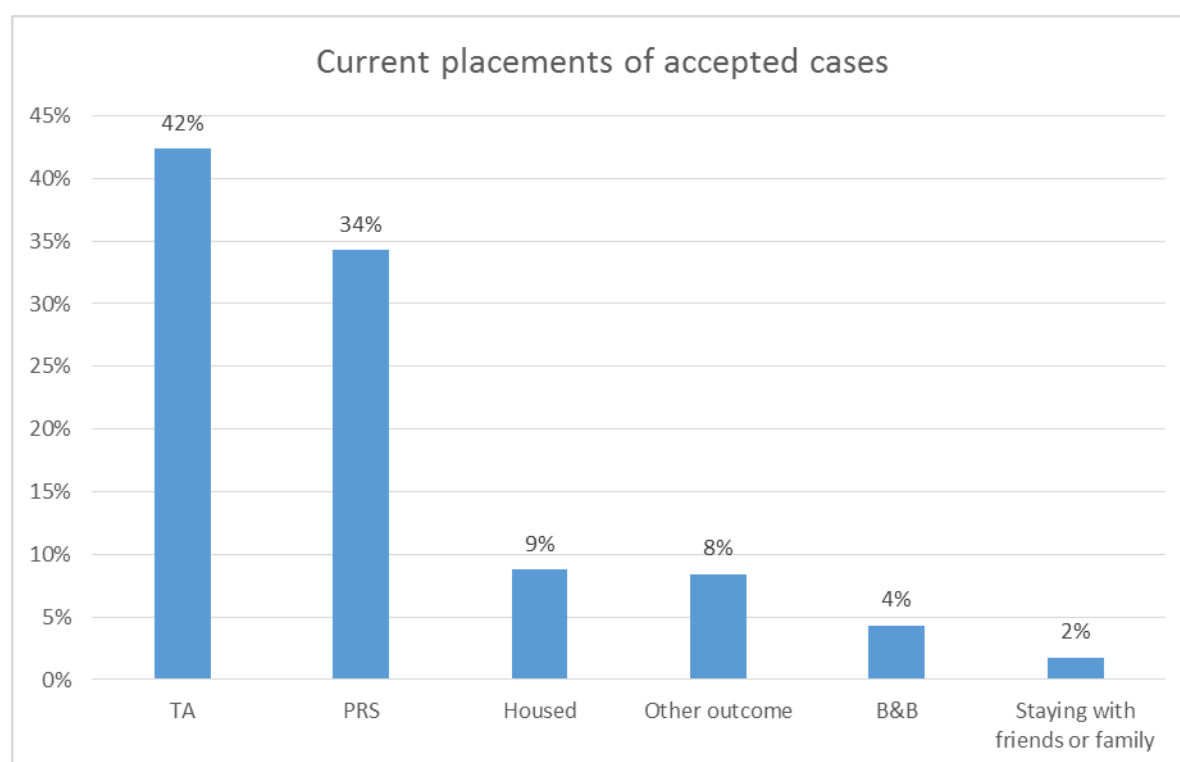
## **SECTION B – IMPACTS ANALYSIS**

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

To evaluate the impact of this proposal, we have analysed the 1,848 homeless households where the main homelessness duty has been accepted for the previous three financial years (April 2015 – March 2018) and assessed their current placements based on their protected characteristics.

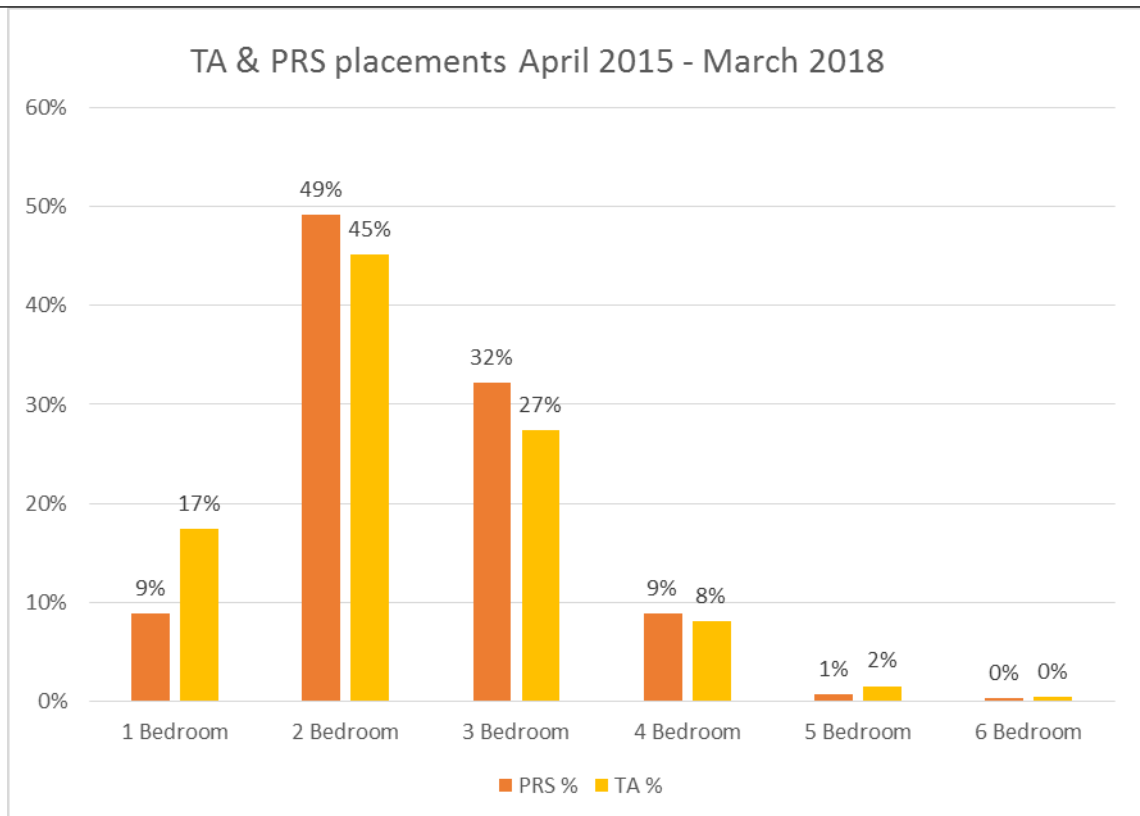
According to the data over the last 3 years:

- 42% (783) of homeless households are placed in to TA
- 34% (633) have been placed into the Private Rented Sector (PRS).
- 4% (80) applicants are in emergency bed & breakfast accommodation (B&B)
- 9% (163) have been housed in social housing
- 8% (156) of applicants have had other outcomes i.e. cases discharged or withdrawn.
- 2% (33) of applicants have made other arrangements for TA, potentially staying with family and friends



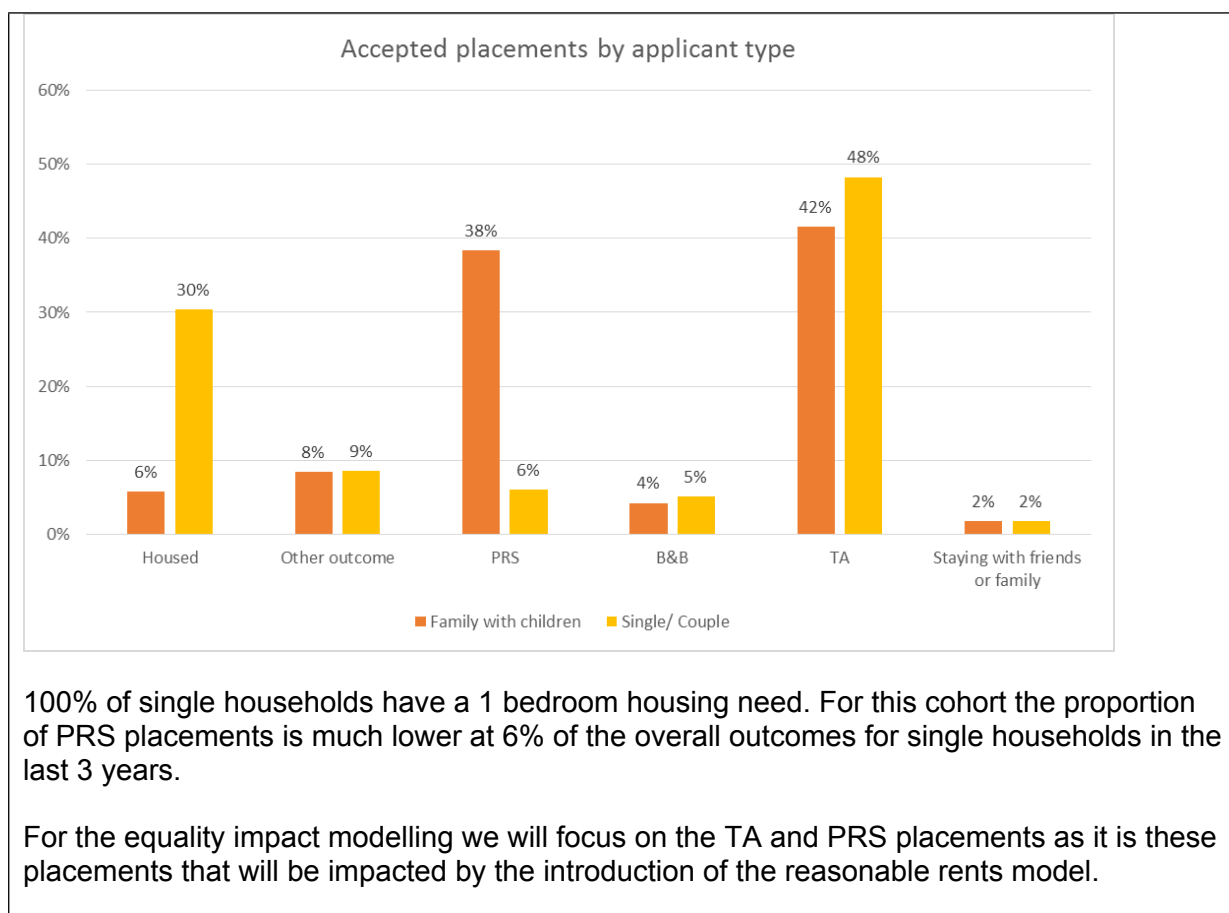
Cases with other outcomes, staying with family or friends, in B&B or housed will be excluded from the analysis, as the reasonable rents model will not affect these outcomes. The 9% of cases that have been housed have had higher bandings due to medical or other reasons.

76% (1,416) of accepted cases are placed into TA or PRS. The below data shows the different outcomes for this cohort by bedroom need which is proportionately similar for both Stage 2 TA and PRS placements after acceptance.



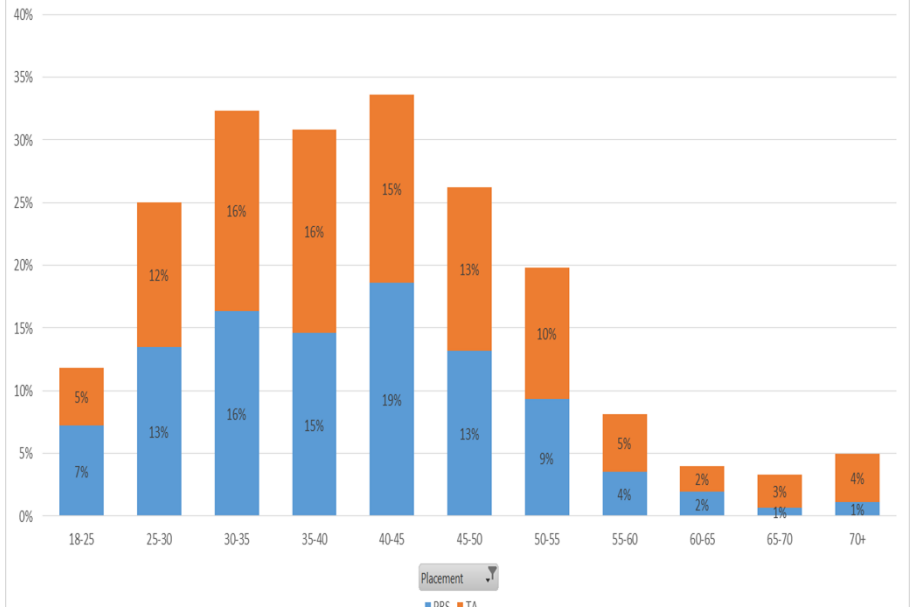
The biggest difference in the placements by bedroom sizes is for 1 bedrooms, which makes up 17% of the TA placements but only 9% of the PRS placements. This is because council stock is more adequately able to meet the demand for 1 bedroom households with an average waiting time of 3 years compared to 9 years for a 2 bedroom property or over 20 years for properties 5 bedroom or larger. Therefore, the focus for PRS procurement is on larger properties to meet the demand.

The below graph shows placements for single households compared to families.



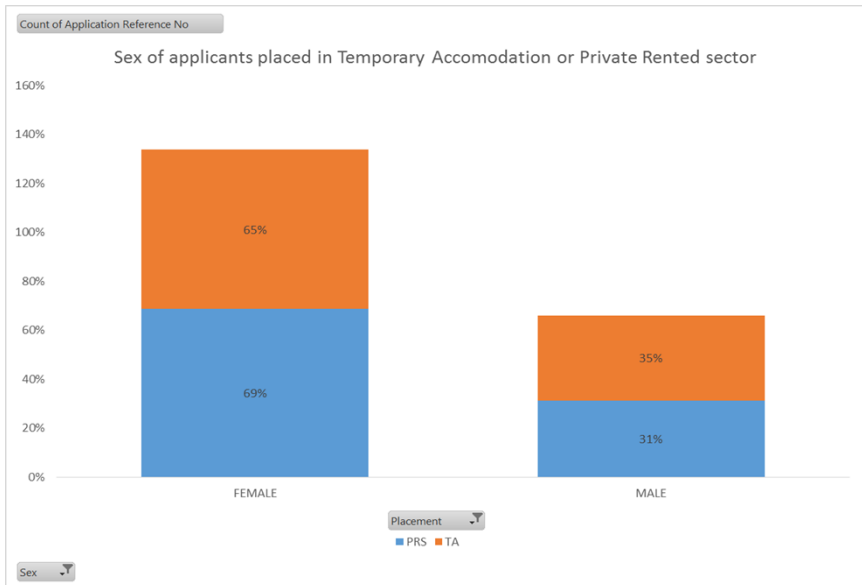
- For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

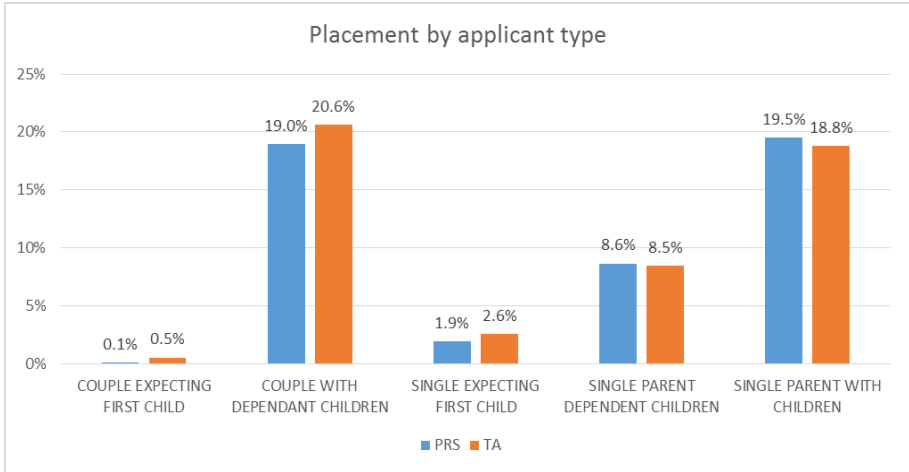
AGE	
<b>Details of impacts identified</b>	<p>The below graph shows the proportion of placements by age band. We do see that placement in TA are proportionately higher for those in the age bands of 65 -70 and 70+. This age band makes up 4.7% of the entire cohort of accepted homeless households.</p> <p>We can also see that this age group tends to be single applicants (57%) and / or requiring smaller bedroom sizes 60% require a 1 bed property, 30% a 2 bed and 10% a 3 bed property.</p> <p>The older households on the waiting list are more likely to have a housing need due to disability or health concern, which is being met by suitable accommodation in the TA stock.</p> <p>It is not anticipated that the introduction of the reasonable rents model will change this distribution based on age as properties are allocated on a needs basis.</p>

	<div><div>Main Applicant IndicatorApplication type</div><div>Count of Application Reference No</div><div>Age of applicants placed in Teporary Accomodation or Private rented sector</div><div><table><thead><tr><th>Age Range</th><th>PRS (%)</th><th>TA (%)</th></tr></thead><tbody><tr><td>18-25</td><td>7%</td><td>5%</td></tr><tr><td>25-30</td><td>13%</td><td>12%</td></tr><tr><td>30-35</td><td>16%</td><td>16%</td></tr><tr><td>35-40</td><td>15%</td><td>16%</td></tr><tr><td>40-45</td><td>19%</td><td>15%</td></tr><tr><td>45-50</td><td>13%</td><td>13%</td></tr><tr><td>50-55</td><td>9%</td><td>10%</td></tr><tr><td>55-60</td><td>4%</td><td>5%</td></tr><tr><td>60-65</td><td>2%</td><td>2%</td></tr><tr><td>65-70</td><td>1%</td><td>3%</td></tr><tr><td>70+</td><td>1%</td><td>4%</td></tr></tbody></table><div>PlacementAge Range</div><div>PRSTA</div></div></div>	Age Range	PRS (%)	TA (%)	18-25	7%	5%	25-30	13%	12%	30-35	16%	16%	35-40	15%	16%	40-45	19%	15%	45-50	13%	13%	50-55	9%	10%	55-60	4%	5%	60-65	2%	2%	65-70	1%	3%	70+	1%	4%
Age Range	PRS (%)	TA (%)																																			
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60-65	2%	2%																																			
65-70	1%	3%																																			
70+	1%	4%																																			
DISABILITY																																					
Details of impacts identified	<p>Through data matching with housing benefit data we can see that 143 (8%) accepted homeless households are currently receiving some form of disability allowance.</p> <p>Of the households identified as receiving a disability allowance, the proportion of placement is 97% into TA while 4 (3%) households were placed in PRS.</p> <p>The other way we can identify disability in our data is through the acceptance decision reason which could be for the below vulnerability reasons:</p> <ul style="list-style-type: none"><li>• ELDERLY</li><li>• VULNERABLE ALCOHOL ABUSE</li><li>• VULNERABLE INCAPABLE OF FINDING OWN ACCM</li><li>• VULNERABLE MEDICAL</li><li>• VULNERABLE MENTAL ABUSE</li><li>• VULNERABLE OTHER</li><li>• VULNERABLE PROBATION OFFICER RECOM.</li><li>• VULNERABLE SOC.SERVICES RECOMMENDATION</li><li>• VULNERABLE VIOLENCE/PHYSICAL ABUSE</li></ul>																																				

	<ul style="list-style-type: none"><li>• VULNERABLE:FLEEING HOME IN VIOLENCE/THRE</li><li>• VULNERABLE:HAVING BEEN IN CUSTODY/ON REM</li></ul> <p>143 (13%) accepted households have been identified as vulnerable in their acceptance decision. Of this cohort 126 (88%) were placed in TA while 17 (12%) had PRS placements.</p> <p>Through both data sets, we see a higher proportion of households with disability or vulnerability indicators placed in TA. Officers acknowledge that this is can be because of the limitations in procuring accommodation in the private rented sector that can meet the needs of the vulnerable or be managed by those who are vulnerable.</p> <p>We can only end homelessness duty with an offer of suitable accommodation and this may mean that social housing is the only option for some households and they will continue to be placed in TA while waiting for an offer.</p>																																																																								
<div>RACE</div>																																																																									
<div>Details of impacts identified</div>	<p>The below graph shows placements for accepted households in the last three years by ethnicity.</p> <div><div>Ethnicity of Applicants placed in Temporary Accommodation or Private Rented Sector</div><table><thead><tr><th>Ethnicity</th><th>% TA</th><th>% PRS</th></tr></thead><tbody><tr><td>Asian Bangladeshi</td><td>1%</td><td>0%</td></tr><tr><td>Asian British</td><td>1%</td><td>1%</td></tr><tr><td>Asian Chinese</td><td>0%</td><td>0%</td></tr><tr><td>Asian Indian</td><td>3%</td><td>3%</td></tr><tr><td>Asian Other</td><td>8%</td><td>9%</td></tr><tr><td>Asian Pakistani</td><td>3%</td><td>3%</td></tr><tr><td>Black African</td><td>18%</td><td>14%</td></tr><tr><td>Black British</td><td>4%</td><td>6%</td></tr><tr><td>Black Caribbean</td><td>11%</td><td>12%</td></tr><tr><td>Black Other</td><td>2%</td><td>3%</td></tr><tr><td>Black Somali</td><td>15%</td><td>15%</td></tr><tr><td>Mixed Other</td><td>1%</td><td>0%</td></tr><tr><td>Mixed White and Asian</td><td>0%</td><td>0%</td></tr><tr><td>Mixed White and Black African</td><td>1%</td><td>1%</td></tr><tr><td>Mixed White and Black Caribbean</td><td>1%</td><td>1%</td></tr><tr><td>Other Afghan</td><td>1%</td><td>0%</td></tr><tr><td>Other Any other group</td><td>7%</td><td>12%</td></tr><tr><td>Other Eastern European</td><td>5%</td><td>5%</td></tr><tr><td>Other Irish/Scottish/Northern Irish</td><td>7%</td><td>5%</td></tr><tr><td>White British/English/Welsh/Scottish</td><td>0%</td><td>1%</td></tr><tr><td>White Gypsy or Irish Traveller</td><td>1%</td><td>0%</td></tr><tr><td>White Irish</td><td>1%</td><td>0%</td></tr><tr><td>White Other</td><td>9%</td><td>8%</td></tr></tbody></table></div>	Ethnicity	% TA	% PRS	Asian Bangladeshi	1%	0%	Asian British	1%	1%	Asian Chinese	0%	0%	Asian Indian	3%	3%	Asian Other	8%	9%	Asian Pakistani	3%	3%	Black African	18%	14%	Black British	4%	6%	Black Caribbean	11%	12%	Black Other	2%	3%	Black Somali	15%	15%	Mixed Other	1%	0%	Mixed White and Asian	0%	0%	Mixed White and Black African	1%	1%	Mixed White and Black Caribbean	1%	1%	Other Afghan	1%	0%	Other Any other group	7%	12%	Other Eastern European	5%	5%	Other Irish/Scottish/Northern Irish	7%	5%	White British/English/Welsh/Scottish	0%	1%	White Gypsy or Irish Traveller	1%	0%	White Irish	1%	0%	White Other	9%	8%
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	<p>The graph shows proportionately similar distribution for TA and PRS placements among those ethnic groups being accepted on the housing waiting list. Therefore officers expect a neutral impact with the indroduction of the reasonable rents model.</p> <p>Officers note that the ethnicity of the main applicant of the household has been used here as a proxy for the ethnicity of the household. We are mindful that using main applicant only may makes an assumption about a homogenous household makeup that may disproportionately exclude the mixed race community in our analysis.</p>																																																																								



	Ethnicity data is unknown for 619 (33%) applicants.									
SEX										
Details of impacts identified	<p>The below graph shows the proportion of applicants placed in TA or PRS based on their sex.</p> <div><p>Count of Application Reference No</p><p>Sex of applicants placed in Temporary Accomodation or Private Rented sector</p><table><thead><tr><th>Sex</th><th>PRS (%)</th><th>TA (%)</th></tr></thead><tbody><tr><td>FEMALE</td><td>69%</td><td>65%</td></tr><tr><td>MALE</td><td>31%</td><td>35%</td></tr></tbody></table></div>	Sex	PRS (%)	TA (%)	FEMALE	69%	65%	MALE	31%	35%
	Sex	PRS (%)	TA (%)							
FEMALE	69%	65%								
MALE	31%	35%								
<p>The proportion of placements in PRS and TA are relatively similar for both sexes.</p> <p>It is anticipated that the introduction of the reasonable rents model will have a nueltral impact on households based on their sex.</p>										
SEXUAL ORIENTATION										
Details of impacts identified	<p>There is insufficient data regarding sexual orientation of the applicants accepted as homeless in the last three years to assess the impact on these groups.</p> <p>Although we do know that LGBTQI people make up between 5 and 7% of the UK population and between 4-6% of Brent's. (Source: Stonewall and GLA for population projection)</p> <p>We do not however, consider there to be any adverse impacts on this group.</p>									
	PREGNANCY AND MATERNITY									

Details of impacts identified	<p>There is insufficient data on pregnancy or maternity in the data set to carry out full analysis. However, there are acceptance reasons based on pregnancy.</p> <p>The below graph shows placement of families accepted based on their family composition. Other acceptance reasons could include medical or vulnerability, which is not mutually exclusive.</p> <div><p>Placement by applicant type</p><table><caption>Placement by applicant type</caption><thead><tr><th>Applicant Type</th><th>PRS (%)</th><th>TA (%)</th></tr></thead><tbody><tr><td>COUPLE EXPECTING FIRST CHILD</td><td>0.1%</td><td>0.5%</td></tr><tr><td>COUPLE WITH DEPENDANT CHILDREN</td><td>19.0%</td><td>20.6%</td></tr><tr><td>SINGLE EXPECTING FIRST CHILD</td><td>1.9%</td><td>2.6%</td></tr><tr><td>SINGLE PARENT DEPENDENT CHILDREN</td><td>8.6%</td><td>8.5%</td></tr><tr><td>SINGLE PARENT WITH CHILDREN</td><td>19.5%</td><td>18.8%</td></tr></tbody></table></div>	Applicant Type	PRS (%)	TA (%)	COUPLE EXPECTING FIRST CHILD	0.1%	0.5%	COUPLE WITH DEPENDANT CHILDREN	19.0%	20.6%	SINGLE EXPECTING FIRST CHILD	1.9%	2.6%	SINGLE PARENT DEPENDENT CHILDREN	8.6%	8.5%	SINGLE PARENT WITH CHILDREN	19.5%	18.8%
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<p>Placements in TA or PRS and are similar for families accepted based on family composition.</p> <p>We do not expect any impact on these groups with the introduction of reasonable rents.</p>																			
RELIGION OR BELIEF																			
Details of impacts identified	<p>There is insufficient data regarding religion of the applicants accepted as homeless in the last three years to assess the impact on these groups.</p> <p>2011 Census data provides us with the following information about religion and belief in the wider borough.</p> <table><tr><th>Religion or belief</th><th>Percentage</th></tr><tr><td>Christianity</td><td>41%</td></tr><tr><td>Islam</td><td>19%</td></tr><tr><td>Hinduism</td><td>18%</td></tr><tr><td>No religion</td><td>11%</td></tr><tr><td>Judaism</td><td>1%</td></tr><tr><td>Buddhism</td><td>1%</td></tr></table> <p>We do not however consider there to be any adverse impacts on any religious group based on their religion or belief.</p>	Religion or belief	Percentage	Christianity	41%	Islam	19%	Hinduism	18%	No religion	11%	Judaism	1%	Buddhism	1%				
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<b>GENDER REASSIGNMENT</b>	
<b>Details of impacts identified</b>	<p>There is insufficient data regarding gender reassignment of the applicants accepted as homeless in the last three years to assess the impact on these groups.</p> <p>The Diversity in Brent document states that 3,400 people in Brent experience gender variance (based on GLA population projections that equates to 1% of the borough population) Source: Stonewall.</p> <p>We do not however consider there to be any adverse impacts on this group based on gender variance.</p>
<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>	
<b>Details of impacts identified</b>	<p>There is insufficient data regarding marital status of the applicants accepted as homeless in the last three years to assess the impact on these groups. We do not however consider there to be any adverse impacts on this group.</p>

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No, the proposal to introduce a new nominations agreement with RPs does not identify any impacts that could be unlawful under the Equality Act.

The new nominations agreement with RPs will provide a household with an offer of accommodation under Part 6 of the Housing Act 1996. This offer must be suitable and affordable for the housing applicant in order to discharge the Council's duty to provide temporary accommodation to accepted homeless households under section 193 of the Housing Act 1996.

Therefore, it advances equality of opportunity in the way that it is a fair and transparent means of allocating homes, based on the needs to the applicant.

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Yes, a number of engagement initiatives were undertaken to gather the views of those affected by the changes to the policy as outlined below. Further engagement is not required.

Formal consultation was launched on 12 November 2018 and ended on 21 January 2019, through an on-line consultation survey. As well as advertising the consultation survey on the Council's website, and on the Locata home page, every household currently on the housing register (including Band D) was notified. Consultation workshops were also held with the following stakeholders;

- Members
- Temporary Accommodation User Forums (attended by approximately 500 households over 5 Forums)
- Registered Providers
- Voluntary Sector
- Adult Social Care
- Children's and Young People Services
- Brent Housing Management

As some of the issues that were being consulted on are fairly technical, the purpose of these workshops was to go through each issue in detail and to give people the opportunity to ask questions to clarify what we were asking them to give their opinion on. Attendees were then encouraged to express their opinions via the consultation survey that was made available via the Council's consultation portal.

An independent research company, bmg Research were also commissioned to facilitate 2 workshops on the 12 March 2019. The first workshop was made up of a group of housing professionals and the second made up of a cross section of residents of the borough. The purpose of these workshops was to give people more of an opportunity to debate the implications and express their views of the various proposals and possible impact on households seeking social housing.

**5. Please detail any areas identified as requiring further data or detailed analysis.**

Data on applicants and households in regards to their protected characteristics, particularly in areas where limited data prevents us drawing any conclusions (as listed below) would help improve our equality analysis.

- Disability
- Sexual orientation
- Gender reassignment
- Religion or belief
- Pregnancy or maternity
- Marriage

The introduction of a new customer portal from April 2018 where homeless applicants can make an application directly and include their demographic information will help to improve data capture in this area.

**6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?**

No negative impacts have been identified based on protected characteristics.

**7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?**

All allocations of properties made under this proposal will be monitored in line with the Council's Allocation Scheme and statutory reporting requirements to relevant agencies. Operational meetings.

**SECTION C - CONCLUSIONS**

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Analysis of placements carried out in the last three years shows that different housing products can be more appropriate for different groups based on needs and availability. The emphasis of the allocations scheme is to ensure suitable accommodation is offered to those households that are in priority need based on clear and equitable guidelines.

The reasonable rents model introduces another option for households to access suitable accommodation, however for those households in need through disability or medical reasons access will remain the same to social housing either directly or through TA.

**SECTION D – RESULT**

<i>Please select one of the following options. Mark with an "X".</i>		
<b>A</b>	<b>CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED</b>	<b>X</b>
<b>B</b>	<b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b>	
<b>C</b>	<b>CHANGE / ADJUST THE POLICY/PROPOSAL</b>	
<b>D</b>	<b>STOP OR ABANDON THE POLICY/PROPOSAL</b>	

**SECTION E - ACTION PLAN**

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

<b>Action</b>	<b>Expected outcome</b>	<b>Officer</b>	<b>Completion Date</b>

**SECTION F – SIGN OFF**

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Omari Gayle
<b>REVIEWING OFFICER:</b>	Lavdrim Krashi
<b>HEAD OF SERVICE:</b>	Laurence Coaker

## EQUALITY ANALYSIS (EA)

### Proposal 2 – Retain Band D waiting time

<b>POLICY/PROPOSAL:</b>	Allowing households currently in Band D to retain the waiting time they accrued when in a higher band if they become homeless and are placed in Temporary Accommodation
<b>DEPARTMENT:</b>	Community Wellbeing
<b>TEAM:</b>	Housing Needs Service
<b>LEAD OFFICER:</b>	Omari Gayle
<b>DATE:</b>	24/04/2019

### SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Following the implementation of the Localism Act 2011, the Council made amendments to the Allocation Scheme that was in place at that time, to reduce the number of households who were in a priority band for social housing. These changes were made because at the time, there were approximately 19,500 households in a priority band on the Housing Register, and the supply of social housing to meet this demand was approximately 600 properties per year. Therefore, the vast majority of these households would never realistically receive an offer of social housing. This change was therefore made in order to manage expectations.

In 2014 amendments were made to the scheme, to prioritise those households in the greatest need, e.g. homeless families, severe overcrowding, medical conditions that were severely affected by the current housing, and poor housing conditions that met the definition of a Category 1 Hazard (defined by the 2005 Regulations) (Part 1 & 7 of the Housing Act 2004).

These changes affected approximately 14,000 households, the majority of whom (approximately 10,000) were cases of overcrowding in the Private Rented Sector (PRS) who were lacking one bedroom. These 14,000 households would never realistically have received an offer of social housing, because there were approximately 5,500 households who had a greater need. Therefore, these 14,000 households were moved from priority Band C to Band D, resulting in them being ineligible to bid.

The waiting time these households had accrued while they were in Band C, was retained when they were relegated to Band D. If one of these households subsequently become homeless and are placed in TA, they are automatically placed in Band C, as a cohort who are given reasonable preference – accepted homeless. However, their registration date starts from the date of their placement in TA for being homeless, and they do not retain any

of the waiting time they accrued when they were previously in Band C due to being prioritised under the former Allocation Scheme.

This proposed amendment would allow households who were moved from a higher Band to Band D, to retain the waiting time accrued in that higher band, and subsequently Band D, if the Council accepts the main duty under homeless legislation and they are placed in settled TA (as opposed to stage 1 emergency TA).

**2. Who may be affected by this policy or proposal?**

There are two groups impacted by this proposal:

1. Those currently in Band C and accepted as homeless or households who are new to homelessness as they may be negatively impacted
2. Those currently in Band D who have previously accrued waiting time in a higher band as they may be positively impacted by this proposal if they were to become homeless

**3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.**

Yes, there is relevance to equality and the council's public sector equality duty as within the cohort of people accessing this service some protected groups are over-represented compared to the borough as a whole.

This is due to the criteria through which priority need is established under the relevant legislation: for example, a household may be regarded as being in priority need owing to age, to a physical disability or mental health condition or to pregnancy. It is also an effect of poverty and disadvantage: some ethnic groups, for example Black Africans, are over-represented among homeless households. Black households make up 52% of current accepted homeless households compared to 21% in the wider borough.

**4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.**

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		x	
Sex		x	
Race		X	
Disability		X	



Sexual orientation		<b>X</b>	
Gender reassignment		<b>X</b>	
Religion or belief		<b>X</b>	
Pregnancy or maternity		<b>X</b>	
Marriage		<b>X</b>	

5. Please complete **each row** of the checklist with an “X”.

<b>SCREENING CHECKLIST</b>		
	<b>YES</b>	<b>NO</b>
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	<b>X</b>	
Does the policy or proposal relate to an area with known inequalities?	<b>X</b>	
Would the policy or proposal change or remove services used by vulnerable groups of people?	<b>X</b>	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	<b>X</b>	
<b>If you have answered YES to ANY of the above, then proceed to section B.</b> <b>If you have answered NO to ALL of the above, then proceed straight to section D.</b>		

## **SECTION B – IMPACTS ANALYSIS**

8. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

To analyse the impact of this proposal we have compared the protected characteristics of the two cohorts impacted by this proposal:

1. The 2,310 households currently in Band C and accepted as homeless
2. The households currently in band D who have previously accrued waiting time in a higher band.

For the analysis, we want to focus on the cohort who are more likely to benefit from this proposal. To isolate these households from the 18,250 in Band D we have used the priority date to identify the households impacted in 2014 by amendments to the allocations scheme. These households have a priority date before 01 February 2014. There are currently 8,793 households who meet this criterion or 48% of the Band D waiting list.

It is noted above that approximately 14,000 households were moved to Band D in 2014. However, changes in circumstances in the intervening 5 years has reduced this number to 8,793.

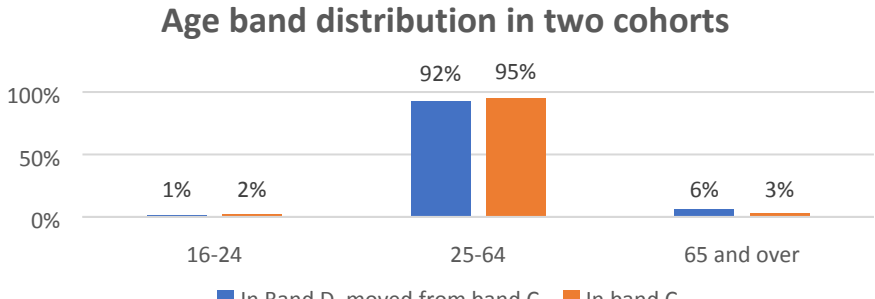
9. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE

Details of impacts identified

As shown in the following graph, there are small differences in the age characteristic of the two cohorts.

Age band distribution in two cohorts



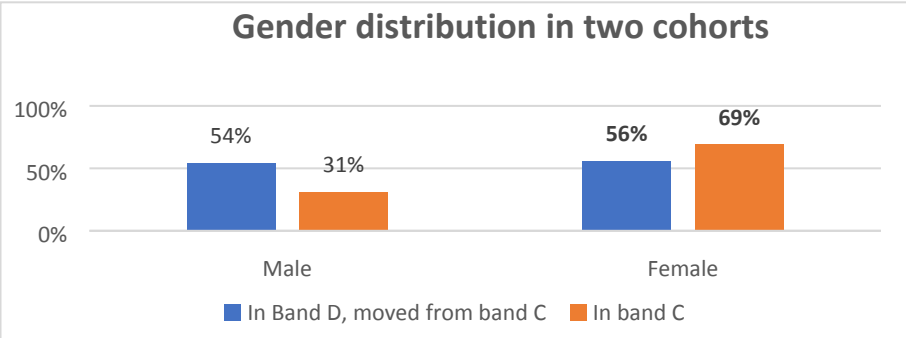
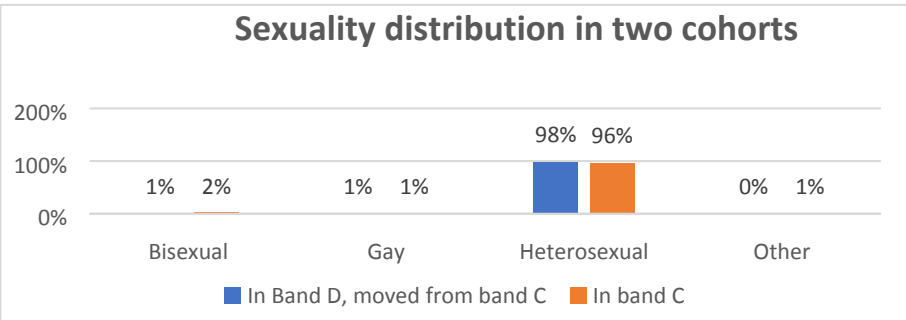
Age Band	In Band D, moved from band C (%)	In band C (%)
16-24	1%	2%
25-64	92%	95%
65 and over	6%	3%

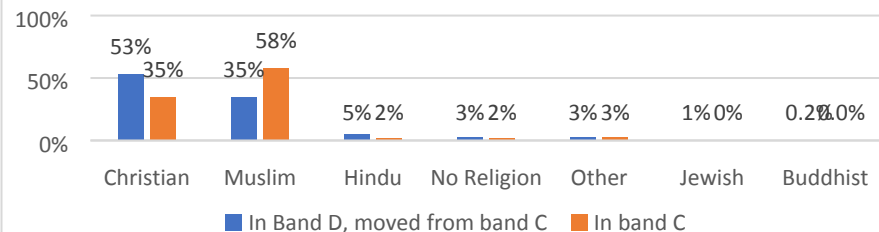
However, the presence of younger and older households is smaller than that in the wider Brent population.

- Younger households are under-represented in the two cohorts, whereas, they make up 12% of Brent population.
- Similarly, older households are between 6% to 3% in the two cohorts, whereas, they make up 11% of Brent population.

DISABILITY

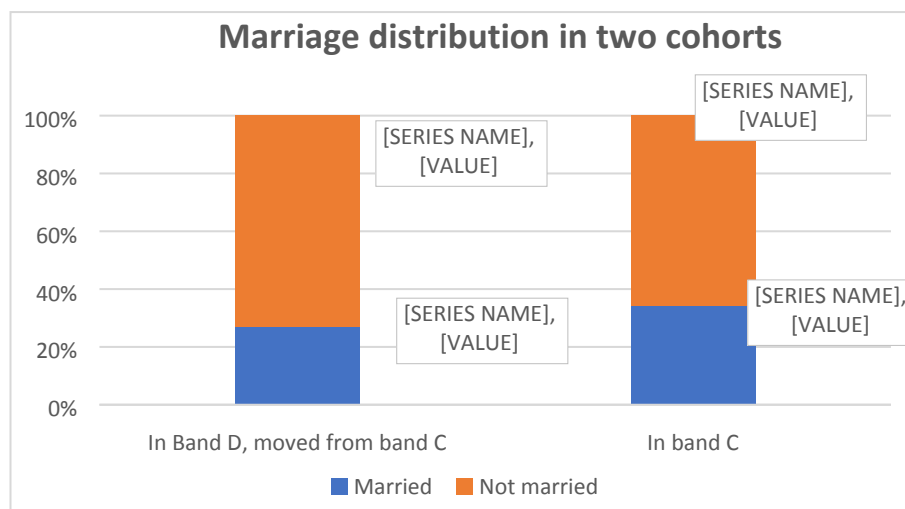
Details of impacts identified	<p>Less than 1% of the pre-Feb 2014 cohort in D have a disability. This is 2% in band C cohort. The presence of disability in both cohorts is much less than the 14% in the wider Brent population.</p> <p>We believe the low presence of disability is likely to be caused by the lack of data collection on this characteristic. Only 45% of the records in both cohorts have disability data completed, as it is not routinely recorded in Locata applications.</p> <p>Disability of households is criteria used in assessing housing priority and need, therefore if households’ circumstances changed based on disability their case would be re-assessed to account for any change in housing need.</p>																		
RACE																			
Details of impacts identified	<p>As presented in the following graph, the ethnic makeup of the two cohorts are very similar. There would be no impact on the race characteristics as both cohorts are similar.</p> <div><p><b>Ethnicity distribution in two cohorts</b></p><table><thead><tr><th>Ethnicity</th><th>In Band D, moved from band C</th><th>In band C</th></tr></thead><tbody><tr><td>Black</td><td>51%</td><td>52%</td></tr><tr><td>Asian</td><td>21%</td><td>21%</td></tr><tr><td>White</td><td>20%</td><td>18%</td></tr><tr><td>Other</td><td>5%</td><td>6%</td></tr><tr><td>Mixed</td><td>3%</td><td>3%</td></tr></tbody></table></div> <p>However, compared to the wider Brent population, black households are over-represented in both cohorts. In Brent, black people make up 21% whereas this is 51% to 52% in both cohorts.</p> <p>Officers note that the ethnicity of the main applicant of the household has been used here as a proxy for the ethnicity of the household. We are mindful that using main applicant only may makes an assumption about a homogenous household makeup that may disproportionately exclude the mixed race community in our analysis.</p>	Ethnicity	In Band D, moved from band C	In band C	Black	51%	52%	Asian	21%	21%	White	20%	18%	Other	5%	6%	Mixed	3%	3%
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White	20%	18%																	
Other	5%	6%																	
Mixed	3%	3%																	
SEX																			

Details of impacts identified	<p>As the graph below shows, female- headed households are over-represented in both pre-Feb band D cohort (56%) and band C cohort (69%). Females make up 49% of Brent’s population.</p> <div><p>Gender distribution in two cohorts</p><table><thead><tr><th>Gender</th><th>In Band D, moved from band C</th><th>In band C</th></tr></thead><tbody><tr><td>Male</td><td>54%</td><td>31%</td></tr><tr><td>Female</td><td>56%</td><td>69%</td></tr></tbody></table></div> <p>In general, women are over represented in the cohorts receiving housing services, as women are more likely to access statutory homelessness support as “a person with whom dependent children reside or might reasonably be expected to reside” places them in priority need for accommodation. (Source: Housing Act 1996, Section 189)</p>	Gender	In Band D, moved from band C	In band C	Male	54%	31%	Female	56%	69%						
	Gender	In Band D, moved from band C	In band C													
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Female	56%	69%														
SEXUAL ORIENTATION																
Details of impacts identified	<p>LGBT households make up only 2% of the pre-Feb band D and 3% of band C. These two percentages are below that of LGBT in Brent’s population, which 4.6%. The following graph shows the sexual orientation in the two cohorts:</p> <div><p>Sexuality distribution in two cohorts</p><table><thead><tr><th>Sexuality</th><th>In Band D, moved from band C</th><th>In band C</th></tr></thead><tbody><tr><td>Bisexual</td><td>1%</td><td>2%</td></tr><tr><td>Gay</td><td>1%</td><td>1%</td></tr><tr><td>Heterosexual</td><td>98%</td><td>96%</td></tr><tr><td>Other</td><td>0%</td><td>1%</td></tr></tbody></table></div> <p>We think these discrepancies are because statutory priorities given to households with children plays a key role in the smaller numbers of LGBT in both cohorts.</p> <p>Officers are mindful that data on sexual orientation is only available on 9% of records.</p>	Sexuality	In Band D, moved from band C	In band C	Bisexual	1%	2%	Gay	1%	1%	Heterosexual	98%	96%	Other	0%	1%
	Sexuality	In Band D, moved from band C	In band C													
Bisexual	1%	2%														
Gay	1%	1%														
Heterosexual	98%	96%														
Other	0%	1%														
PREGANCY AND MATERNITY																

Details of impacts identified	<p>There is insufficient data on pregnancy and maternity for the Band D cohort as this is not routinely recorded in the Locata system where these cases are held. It is recorded in Northgate where homeless applications are processed so we can see that 10% of those on band C have a pregnancy indicator.</p> <p>Pregnancy and maternity are criteria in assessing housing priority and need, therefore if households' circumstances changed based on pregnancy or maternity their case would be re-assessed to account for any change in housing need.</p>																								
RELIGION OR BELIEF																									
Details of impacts identified	<p>We see similar distribution of religion in both cohorts.</p> <div><p>Religion distribution in two cohorts</p><table><thead><tr><th>Religion</th><th>In Band D, moved from band C (%)</th><th>In band C (%)</th></tr></thead><tbody><tr><td>Christian</td><td>53%</td><td>35%</td></tr><tr><td>Muslim</td><td>35%</td><td>58%</td></tr><tr><td>Hindu</td><td>5%</td><td>2%</td></tr><tr><td>No Religion</td><td>3%</td><td>2%</td></tr><tr><td>Other</td><td>3%</td><td>3%</td></tr><tr><td>Jewish</td><td>1%</td><td>0%</td></tr><tr><td>Buddhist</td><td>0.2%</td><td>0%</td></tr></tbody></table></div> <p>Compared to the wider Brent population, Muslim households are over represented in both the band D pre Feb 2014 cohort (35%) and in the band C cohort (58%). Christian households are over represented only in the band D pre Feb 2014 cohort (53%). Hindus are underrepresented, as they make up 5% and 2% compared to 20% in the Brent population.</p> <p>It is important to note that data on religion is available on 27% of the household records, which is not robust enough to draw conclusions.</p>	Religion	In Band D, moved from band C (%)	In band C (%)	Christian	53%	35%	Muslim	35%	58%	Hindu	5%	2%	No Religion	3%	2%	Other	3%	3%	Jewish	1%	0%	Buddhist	0.2%	0%
Religion	In Band D, moved from band C (%)	In band C (%)																							
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Jewish	1%	0%																							
Buddhist	0.2%	0%																							
GENDER REASSIGNMENT																									
Details of impacts identified	<p>There is insufficient data on gender reassignment within these cohorts. We do not however expect there to be any impacts on these groups based on this protected characteristic</p>																								
MARRIAGE & CIVIL PARTNERSHIP																									

**Details of impacts identified**

Of the band D pre-Feb 2014 cohort, 73% of the households are not married or in civil partnership. In band C cohort, 62% are not married. The following graph illustrates this. In the wider Brent population, 47% are not married.



The above figures are expected for the households in need of the council's housing services. The figures reflect gender roles, single parenting and economic deprivation related to the households seeking the council is housing services.

10. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

The proposal to retain priority time accrued in a higher band does not impact on any cohort based on their protected characteristics.

Housing assessments are reviewed when the circumstances of a household change and a households priority need and the type of accommodation required will be reassessed as appropriate to ensure fair and equitable allocation of housing.

11. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Yes, a number of engagement initiatives were undertaken to gather the views of those affected by the changes to the policy as outlined below. Further engagement is not required.

Formal consultation was launched on 12 November 2018 and ended on 21 January 2019, through an on-line consultation survey. As well as advertising the consultation survey on the Council's website, and on the Locata home page, every household currently on the housing register (including Band D) was notified. Consultation workshops were also held with the following stakeholders;

- Members
- Temporary Accommodation User Forums (attended by approximately 500 households over 5 Forums)

- Registered Providers
- Voluntary Sector
- Adult Social Care
- Children's and Young People Services
- Brent Housing Management

As some of the issues that were being consulted on are technical, the purpose of these workshops was to go through each issue in detail and to give people the opportunity to ask questions to clarify what we were asking them to give their opinion on. Attendees were then encouraged to express their opinions via the consultation survey that was made available via the Council's consultation portal.

An independent research company, bmg Research were also commissioned to facilitate 2 workshops on the 12 March 2019. The first workshop was made up of a group of housing professionals and the second made up of a cross section of residents of the borough. The purpose of these workshops was to give people more of an opportunity to debate the implications and express their views of the various proposals and possible impact on households seeking social housing.

12. Please detail any areas identified as requiring further data or detailed analysis.

Data on applicants and households in regards to their protected characteristics, particularly in areas where limited data prevents us drawing any conclusions (as listed below) would help improve our equality analysis.

- Disability
- Sexual orientation
- Gender reassignment
- Religion or belief
- Pregnancy or maternity
- Marriage

The introduction of a new customer portal from April 2018 where homeless applicants can make an application directly and include their demographic information will help to improve data capture in this area.

13. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

No negative impacts have been identified based on protected characteristics

14. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

All allocations of properties made under this proposal will be monitored in line with the Council's Allocation Scheme and statutory reporting requirements to relevant agencies. Operational meetings.

## **SECTION C - CONCLUSIONS**

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

The analysis of data available shows no advantage or disadvantage to any groups based on their protected characteristics, therefore the impact of this proposal is neutral.

## SECTION D – RESULT

<i>Please select one of the following options. Mark with an "X".</i>		
<b>A</b>	<b>CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED</b>	<b>X</b>
<b>B</b>	<b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b>	
<b>C</b>	<b>CHANGE / ADJUST THE POLICY/PROPOSAL</b>	
<b>D</b>	<b>STOP OR ABANDON THE POLICY/PROPOSAL</b>	

## SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

<b>Action</b>	<b>Expected outcome</b>	<b>Officer</b>	<b>Completion Date</b>



**SECTION F – SIGN OFF**

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Omari Gayle	
<b>REVIEWING OFFICER:</b>	Lavdrim Krashi	
<b>HEAD OF SERVICE:</b>	Laurence Coaker	

### EQUALITY ANALYSIS (EA)

#### Proposal 3 – Local Lettings Transfer List

<b>POLICY/PROPOSAL:</b>	Local Lettings Policy - Give priority to households who need a transfer to bid for new accommodation that becomes available on their current estate.
<b>DEPARTMENT:</b>	Community Wellbeing
<b>TEAM:</b>	Housing Needs Service
<b>LEAD OFFICER:</b>	Omari Gayle
<b>DATE:</b>	24/04/2019

#### SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

A tenant can apply for a transfer on the basis of housing need – for example that the household is overcrowded – and the application will be assessed on the basis of reasonable preference.

There are currently 267 Brent Council Tenants who are registered for a management transfer due to overcrowding, medical or other reason and have been assessed in Bands A-C and therefore are able to place bids.

The Council is proactively working to increase the supply of affordable accommodation in Brent, including building new Council homes. Unfortunately, Brent is not blessed with swathes of brownfield sites, therefore most of the new homes will be built on available land on existing estates i.e. infill. The intention is to make the best use of existing available land, for example by demolishing underutilised garages.

This proposal is to give existing tenants who are registered for a transfer priority to bid for new units that become available on their estate, to enable them to remain on the estate and avoid having to relocate to another area. This will also increase community acceptance of infill schemes, as residents can see how it would benefit them.

2. Who may be affected by this policy or proposal?

By giving existing tenants registered for a transfer priority to bid for new units that become available on their estate they will be better placed to secure a transfer, over other tenants who may have been waiting for a longer period but with no new units available on their estate.

This proposal offers benefit to those who are on the transfer list and have no issue with the area they are living, but there are some on the transfer list who may be there due to fear of violence or hate crime in their area and need to move from the area they are in.

It also affects homeless households who the council has accepted the main rehousing duty under homelessness legislation, currently there are 2,450 such households. The new in-fill unit/s will be 100% marked for council tenants (transfers) – the voids they subsequently leave will be allocated 70% to Homeless families.

At present Council social lettings plan aims at:

- 70% of properties are prioritised to approve homeless households.
- 20% of properties are prioritised to council tenants (transfers).
- 10% of properties are prioritised for households in the Private Rented Sector (PRS) who have an identified housing need.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, there is relevance to equality and the council's public sector equality duty as within the cohort of people accessing this service some protected groups are over-represented compared to the borough as a whole.

This is due to the criteria through which priority need is established under the relevant legislation: for example, a household may be regarded as being in priority need owing to age, to a physical disability or mental health condition or to pregnancy. It is also an effect of poverty and disadvantage: some ethnic groups, for example Black Africans, are over-represented among homeless households. Black Africans make up 21% of current accepted homeless households compared to 7.9% in the wider borough.

(Source: 2016 population from GLA)

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		<b>x</b>	
Sex		<b>x</b>	
Race		<b>x</b>	
Disability		<b>x</b>	
Sexual orientation		<b>x</b>	
Gender reassignment		<b>x</b>	
Religion or belief		<b>x</b>	
Pregnancy or maternity		<b>x</b>	

Marriage		<b>x</b>	
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5. Please complete **each row** of the checklist with an "X".

<b>SCREENING CHECKLIST</b>		
	<b>YES</b>	<b>NO</b>
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	<b>x</b>	
Does the policy or proposal relate to an area with known inequalities?	<b>x</b>	
Would the policy or proposal change or remove services used by vulnerable groups of people?	<b>x</b>	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	<b>x</b>	
<b>If you have answered YES to ANY of the above, then proceed to section B.</b> <b>If you have answered NO to ALL of the above, then proceed straight to section D.</b>		

## SECTION B – IMPACTS ANALYSIS

15. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

To assess the impact of this proposal, we have identified and analysed 267 households that make-up the council's transfer waiting list. This cohort was obtained from the social housing allocation system (Locata) used by Brent Council.

The 267 households were then matched against a list of 25 "in-fill" sites. 18 households (out of the 267 households) were successfully selected as they matched eight "in-fill" sites. This is 6.7% of 267 households in the transfer waiting list.

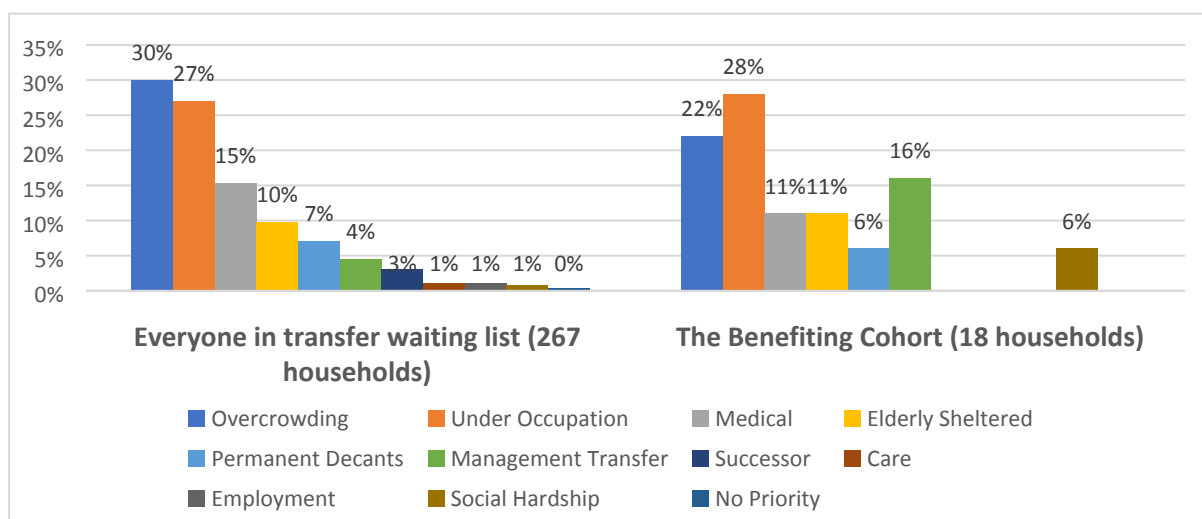
The following methods were used to search for matches:

- Exact postcode match.
- Exact address match.
- Same block or street match.
- Partial postcode matching using 'postcode sectors', this is by using postcodes without the last two digits (example: HA9 0). This resulted in a large number of matches, which were then investigated individually, and further matches were identified.

Households were labelled to indicate which cohort they belong to. Therefore, 18 households were labelled as 'matched' and 249 were labelled as 'unmatched'.

A series of pivot tables and illustrative graphs were created to analyse data related to each of the protected characteristics for the heads of the households, these were repeated for each cohort. In some areas, further complex analysis was concluded. For example, when analysing age data, we also added banding reasons from the housing register to show the type of needs of the cohort.

In addition, the band reason was analysed for all 267 households on the transfer waiting list and the matched 18 households. This is because the reason for being in the transfer waiting list is key to understanding patterns and trends. The following graph illustrates the banding reasons for both cohorts:

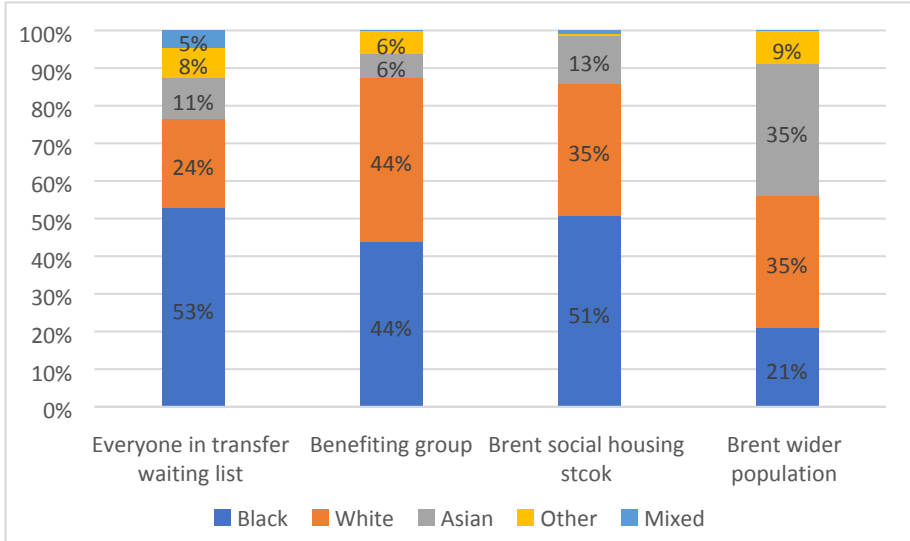


To clarify the meaning of the unclear categories in the above graph. 'Management Transfer' covers households with critical need for a transfer such as harassment and fear of violence. 'Social Hardship' refers to complex multiple priority needs such as being overcrowded and have a medical condition.

The availability of equality data on each protected characteristics was evaluated. The validity of the analysis on this data was confirmed in the supplied commentary in each section of the protected characteristics.

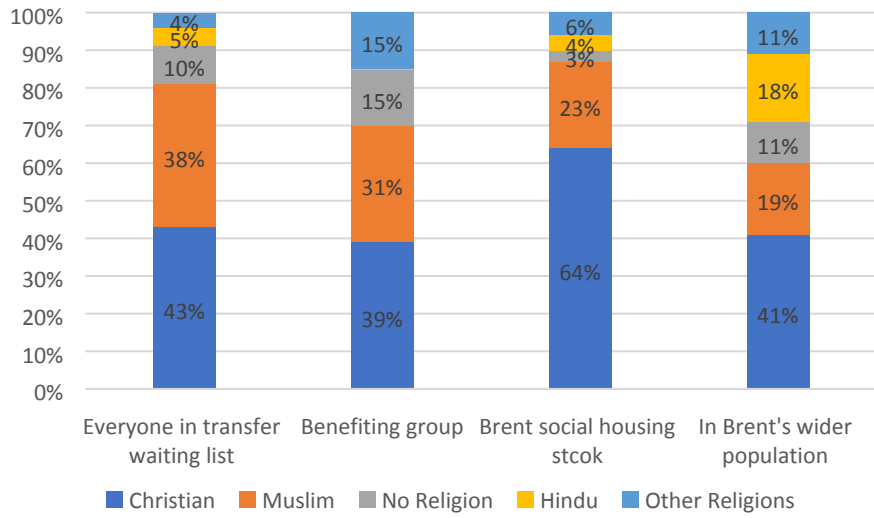
16. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

AGE																	
Details of impacts identified	<p>The following graph shows strong similarity in proportion of all age groups in both cohorts, the cohort in the transfer waiting list (blue columns) and the benefiting cohort (orange columns).</p> <table><thead><tr><th>Age Group</th><th>Everyone in transfer waiting list</th><th>Benefiting group</th><th>Winder Brent population</th></tr></thead><tbody><tr><td>Aged 20-24</td><td>1%</td><td>0%</td><td>12%</td></tr><tr><td>Aged 25-64</td><td>73%</td><td>72%</td><td>57%</td></tr><tr><td>Aged 65 and over</td><td>27%</td><td>28%</td><td>11%</td></tr></tbody></table>	Age Group	Everyone in transfer waiting list	Benefiting group	Winder Brent population	Aged 20-24	1%	0%	12%	Aged 25-64	73%	72%	57%	Aged 65 and over	27%	28%	11%
	Age Group	Everyone in transfer waiting list	Benefiting group	Winder Brent population													
	Aged 20-24	1%	0%	12%													
Aged 25-64	73%	72%	57%														
Aged 65 and over	27%	28%	11%														
	<p>However, when comparing these two cohorts with the age of the wider population in Brent (grey column), the percentage of households aged 65 and over in the transfer waiting list is over a double of that in the Brent's population.</p> <p>The transfer list is overrepresented with older people who were allocated social housing a long time ago and then over time their needs have changed. The needs of these older people tend to be due to under occupying (43%), elderly sheltered accommodation needs (30%) and medical needs (16%).</p>																
DISABILITY																	

<div>Details of impacts identified</div>	<div><p>In households with disability data, 36% of the benefiting households are disabled. Similarly, 35% are disabled in the larger cohort of households in the transfer waiting list.</p><p>The representation of households with disabilities in both cohorts is almost equal in both cohorts. However, this over double of percentage of disabled people in the Brent population, which is 14.4% again this is because the nature of the transfer list prioritises those with medical needs.</p><p>Disability data is obtained on 54% of the 267 households that are in the transfer waiting list. Disability data is obtained in 78% of the 18 households that would benefit from the proposal</p></div>																														
RACE																															
<div>Details of impacts identified</div>	<div><p>The below graph shows the transfer list compared to the benefiting cohort by ethnicity, households in Brent social housing stock and the wider Brent population.</p><div><table><thead><tr><th>Ethnicity</th><th>Everyone in transfer waiting list</th><th>Benefiting group</th><th>Brent social housing stock</th><th>Brent wider population</th></tr></thead><tbody><tr><td>Black</td><td>53%</td><td>44%</td><td>51%</td><td>21%</td></tr><tr><td>White</td><td>24%</td><td>44%</td><td>35%</td><td>35%</td></tr><tr><td>Asian</td><td>11%</td><td>6%</td><td>13%</td><td>35%</td></tr><tr><td>Other</td><td>8%</td><td>6%</td><td>0%</td><td>9%</td></tr><tr><td>Mixed</td><td>5%</td><td>0%</td><td>0%</td><td>0%</td></tr></tbody></table></div><p>As shown in the graph above, Asian households are under-represented in both cohorts compared to the wider population in Brent and the households currently in Brent social housing stock. In addition, mixed ethnic backgrounds households are not represented in the benefiting cohort at all.</p><p>Data on ethnicity is available on 90% of the larger cohort (267 households) in the transfer waiting list. This is 89% in the benefiting cohort (18 households).</p></div>	Ethnicity	Everyone in transfer waiting list	Benefiting group	Brent social housing stock	Brent wider population	Black	53%	44%	51%	21%	White	24%	44%	35%	35%	Asian	11%	6%	13%	35%	Other	8%	6%	0%	9%	Mixed	5%	0%	0%	0%
Ethnicity	Everyone in transfer waiting list	Benefiting group	Brent social housing stock	Brent wider population																											
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Mixed	5%	0%	0%	0%																											
SEX																															

<b>Details of impacts identified</b>	<p>The majority (67%) of the 267 households in the transfer waiting list are headed by women. Likewise, the majority (72%) of the 18 households that would benefit from the proposal are also headed by women. Both cohorts share similarity in their gender structure.</p> <p>Households headed by men are under-represented in both the transfer cohort and the benefiting cohort; men make up 50.9% of Brent's population.</p> <p>However, this is expected as due to the criteria through which priority housing need is established under the relevant legislation for example pregnancy and children. Female-headed households make up over half of the council's housing waiting list and those living in council housing.</p>
<b>SEXUAL ORIENTATION</b>	
<b>Details of impacts identified</b>	<p>LGBT households make up 3% of the 267 households in the transfer waiting list. However, 100% of the benefiting cohort are heterosexual with no LGBT households in this cohort. LGBT people make up 5-7% of the population in Brent.</p> <p>Data on households' sexual orientation is available on 76% of households in the transfer waiting list. This is 66% in the 18 households that would benefit from the proposal.</p>
<b>PREGANCY AND MATERNITY</b>	
<b>Details of impacts identified</b>	<p>Of the 267 households in Brent Council's transfer list, 9% have a pregnancy/maternity indicator. This is 6% in the cohort that would benefit from the proposal changes; this is actually just one household.</p> <p>It is important to underline that data on pregnancy/maternity is mostly historical indicators and do not confirm that the pregnancies are current.</p>
<b>RELIGION OR BELIEF</b>	
<b>Details of impacts identified</b>	<p>The below graph shows the religion or belief of the applicants on the transfer list compared to the benefiting cohort, households in Brent's social housing stock and the wider Brent population.</p>



	<div><table><thead><tr><th>Religion</th><th>Everyone in transfer waiting list</th><th>Benefiting group</th><th>Brent social housing stock</th><th>In Brent's wider population</th></tr></thead><tbody><tr><td>Christian</td><td>43%</td><td>39%</td><td>64%</td><td>41%</td></tr><tr><td>Muslim</td><td>38%</td><td>31%</td><td>23%</td><td>19%</td></tr><tr><td>No Religion</td><td>10%</td><td>15%</td><td>4%</td><td>11%</td></tr><tr><td>Hindu</td><td>5%</td><td>0%</td><td>4%</td><td>18%</td></tr><tr><td>Other Religions</td><td>4%</td><td>15%</td><td>6%</td><td>11%</td></tr></tbody></table></div> <p>As shown in the graph above, households with no religion or other religion are over-represented in the benefiting group; this is a glitch resulting from the random nature of selecting a small benefiting cohort.</p> <p>In addition, Hindus are not represented in the benefiting group at all despite being 18% of the Brent population.</p> <p>The above graph points to a significant difference in the religion characteristics of the households in Brent social housing stock and the wider Brent population. The largest two religion groups, Christians (64%) and Muslims (23%) are over-represented in Brent's social housing stock. Christians in Brent make up 41% of the population and Muslims make up 19%.</p> <p>Data on religion/belief is stated on 76% of the 267 households in the larger transfer waiting time, this is 72% of the 18 households that would benefit from the proposal.</p>	Religion	Everyone in transfer waiting list	Benefiting group	Brent social housing stock	In Brent's wider population	Christian	43%	39%	64%	41%	Muslim	38%	31%	23%	19%	No Religion	10%	15%	4%	11%	Hindu	5%	0%	4%	18%	Other Religions	4%	15%	6%	11%
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Other Religions	4%	15%	6%	11%																											
GENDER REASSIGNMENT																															
Details of impacts identified	<p>There is insufficient data regarding gender reassignment of the 267 households in the transfer waiting list. Subsequently, none of the matched 18 households (out of the 267) had data available on gender reassignment.</p> <p>The Diversity in Brent document states that 3,400 people in Brent experience gender variance (based on GLA population projections that equates to 1% of the borough population) Source: Stonewall.</p> <p>We do not however consider there to be any adverse impacts on this group based on gender variance. This is because of the small size of both cohorts in the transfer list and the matched cohort.</p>																														

**MARRIAGE & CIVIL PARTNERSHIP**
**Details of impacts identified**

There is insufficient data regarding marital status of the households on the transfer list to assess the impact on these groups. We do not however consider there to be any adverse impacts on this group.

17. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No, the proposal to prioritise households who need a transfer to bid for accommodation that becomes available on their current estate upholds the objectives of the Council's Allocations scheme, particularly

- To increase the sustainability of local communities  
This proposal will promote the sustainability of local communities by prioritising those within the estate for any new build property on that estate
- To ensure that the scheme allows the Council and its partner organisation to make best use of homes and in particular adapted properties

This proposal will help the council make best use of homes by matching those with a transfer need to newly built properties on the estate.

18. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Yes, a number of engagement initiatives were undertaken to gather the views of those affected by the changes to the policy as outlined below. Further engagement is not required.

Formal consultation was launched on 12 November 2018 and ended on 21 January 2019, through an on-line consultation survey. As well as advertising the consultation survey on the Council's website, and on the Locata home page, every household currently on the housing register (including Band D) was notified. Consultation workshops were also held with the following stakeholders;

- Members
- Temporary Accommodation User Forums (attended by approximately 500 households over 5 Forums)
- Registered Providers
- Voluntary Sector
- Adult Social Care
- Children's and Young People Services
- Brent Housing Management

As some of the issues that were being consulted on are fairly technical the purpose of these workshops was to go through each issue in detail and to give people the opportunity to ask questions to clarify what we were asking them to give their opinion on. Attendees were then encouraged to express their opinions via the consultation survey that was made available via the Council's consultation portal.

An independent research company, bmg Research were also commissioned to facilitate 2 workshops on the 12 March 2019. The first workshop was made up of a group of housing professionals and the second made up of a cross section of residents of the borough. The purpose of these workshops was to give people more of an opportunity to debate the implications and express their views of the various proposals and possible impact on households seeking social housing.

19. Please detail any areas identified as requiring further data or detailed analysis.

Data on applicants and households in regards to their protected characteristics, particularly in areas where limited data prevents us drawing any conclusions (as listed below) would help improve our equality analysis.

- Disability
- Sexual orientation
- Gender reassignment
- Religion or belief
- Pregnancy or maternity
- Marriage

The introduction of a new customer portal from April 2018 where homeless applicants can make an application directly and include their demographic information will help to improve data capture in this area.

20. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

Households with pending medical needs and those fleeing violence or hate crime and waiting for a transfer would have less priority, as the priority would be given to households who live on the estate first.

Households feeling violence or hate crime make up 5% of the transfer waiting list, these are mostly females. Households with medical priority needs make up 15% of the transfer waiting list, one-third of these households have a disability.

Because households would be transferred to the same neighbourhood, any local issues on an estate could be perpetuated.

21. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

All allocations of properties made under this proposal will be monitored in line with the Council's Allocation Scheme and statutory reporting requirements to relevant agencies. Operational meetings.

## **SECTION C - CONCLUSIONS**

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Although the number of households on the transfer waiting list is small, this proposal would positively enable transferees in retaining their local connections, communities and services. For example, children would maintain accessing the same schools and activities. In addition, this would enable older people to continue accessing the same services and community activities.

On the other hand, due to the randomness of the selection process, this proposal could deprive households with legitimately urgent needs to transfer from enhancing their quality of life.

**Age:** Older (aged 65 and over) households are over-represented in the transfer waiting list. Older households make up 27% of the transfer waiting list and 28% of the benefiting cohort. Whereas, this group make up only 12% of Brent's population.

Many of these older households are under-occupiers that the Council is actively working with to help find them suitable accommodation, which would in turn release larger sized properties for overcrowded households in the borough.

**Disability:** The high presence of disabled households in the transfer waiting list is expected as these households seek properties that meet their medical needs. The ability to move to suitable accommodation within their estate would offer a positive impact for this group.

**Race:** Asian households are under-represented in both cohorts compared to the wider population in Brent. In addition, households of mixed ethnic backgrounds are not represented in the benefiting cohort. Due the availability of social housing, the numbers and structure of ethnic groups in the transfer waiting list reflect the presence of established communities with the larger groups represented in line with Brent's population statistics.

The smaller number of available properties for transfer and the random nature of selecting households for the transfer would result in less or no households from the smaller ethnic groups.

**Sex:** Households headed by men are under-represented in both the transfer cohort and the benefiting cohort. However, this is expected as due to the criteria through which priority-housing need is established under the relevant legislation for example pregnancy and children. Female-headed households make up over half of the council's housing waiting list and those living in council housing.

**Sexual orientation:** LGBT households make up only 3% of the transfer waiting list. Moreover, none of the households benefiting from the proposal is LGBT. This is likely to be attributed to the priority given to households with children in the initial stages of allocating social housing in Brent. This is another example where due to the randomness of the selection process, smaller minority groups could miss already limited opportunities.

**Religion:** Households with no religion or other smaller religions are over-represented in the benefiting group. Moreover, Muslim households are over-represented in both cohorts compared to the wider Brent population.

The smaller number of available properties for transfer and the random nature of selecting households for the transfer would result in less or no households from the smaller faith groups.

**SECTION D – RESULT**

<i>Please select one of the following options. Mark with an "X".</i>		
<b>A</b>	<b>CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED</b>	<b>X</b>
<b>B</b>	<b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b>	
<b>C</b>	<b>CHANGE / ADJUST THE POLICY/PROPOSAL</b>	
<b>D</b>	<b>STOP OR ABANDON THE POLICY/PROPOSAL</b>	

**SECTION E - ACTION PLAN**

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

**SECTION F – SIGN OFF**

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Omari Gayle
<b>REVIEWING OFFICER:</b>	Lavdrim Krashi
<b>HEAD OF SERVICE:</b>	Laurence Coaker

### EQUALITY ANALYSIS (EA)

#### Proposal 4 – Local Lettings Temporary Accommodation

<b>POLICY/PROPOSAL:</b>	Local Lettings Policy - Give priority to accepted homeless households living in Temporary Accommodation on an estate that is being regenerated, for an allocation of social housing that becomes available on the same estate
<b>DEPARTMENT:</b>	Community Wellbeing
<b>TEAM:</b>	Housing Needs Service
<b>LEAD OFFICER:</b>	Omari Gayle
<b>DATE:</b>	24/04/2019

### SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

This proposal is similar to the proposed *Local Lettings Policy - Give priority to households who need a transfer to bid for accommodation that becomes available on their current estate above*, and would give existing households who the Council has accepted the main homelessness duty to and who are living in Temporary Accommodation priority for an offer of social housing on the same estate, if the estate is being regenerated.

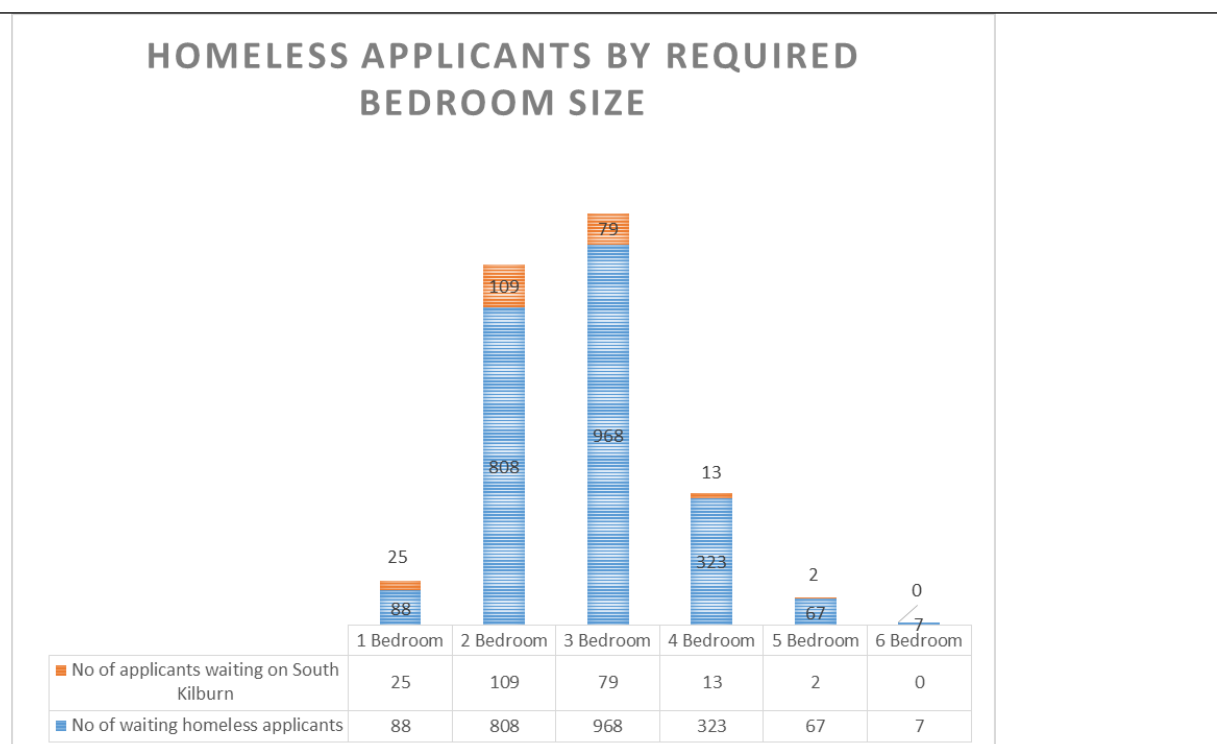
2. Who may be affected by this policy or proposal?

This proposal affects the 2,261 accepted homeless households on the council's waiting list in band C. The majority of these households are waiting in temporary accommodation while others may have made their own arrangements for temporary accommodation for example staying with friends or family. These households are waiting for suitable accommodation to be allocated for them through the council's allocations policy.

Of this group 228 currently, reside on the councils South Kilburn Estate. These applicants make up 10% of the waiting list. By offering this group priority on their estate, they would potentially benefit by accessing social housing much faster than they would have in the general waiting list. This effectively allows them to 'jump the queue'.

In 2017/18, 618 units of social housing were available to be allocated to meet this demand. Of these units, 44% were 1 bed properties, whereas 83% of the demand, in Bands A-C is for family sized accommodation. The limited supply of stock means that households can wait for years in temporary accommodation.

The below graph shows the applicants on the waiting list by bedroom required.



The average waiting time for a household varies depending on their bed size need. The below table shows the average waiting time for each property size and the number of each cohort who have waited longer than this time.

Bedroom Size	Average Waiting Time	No of Homeless applicants meeting the average waiting time	No of South Kilburn applicants meeting the average waiting time
1	2 Years	23	12
2	9 Years	98	9
3	16 Years	127	8
4	20 Years	31	0
5	20 Years	8	0
6	20 Years +	1	0
Total		294	29

On average homeless applicants residing on South Kilburn Estate currently have a waiting time that is lower than their counterparts living in Temporary Accommodation outside of South Kilburn. South Kilburn residents who have waited over the average waiting time have waited on average 9 years for their social housing accommodation, while other homeless applicants who have waited over the average waiting time have waited on average 15.4 years over the average waiting time.

- Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, there is relevance to equality and the council's public sector equality duty as within the cohort of people accessing this service some protected groups are over-represented compared to the borough as a whole.

This is due to the criteria through which priority need is established under the relevant legislation: for example, a household may be regarded as being in priority need owing to age, to a physical disability or mental health condition or to pregnancy. It is also an effect of poverty and disadvantage: some ethnic groups, for example Black Africans, are over-represented among homeless households. Black Africans make up 21% of current accepted homeless households compared to 7.9% in the wider borough.

(Source: 2016 population from GLA)

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?	X	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	



**If you have answered YES to ANY of the above, then proceed to section B.**  
**If you have answered NO to ALL of the above, then proceed straight to section D.**

## SECTION B – IMPACTS ANALYSIS

22. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

To analyse the impact of this proposal officers have compared the characteristics of the 2,261 accepted homeless households on the council's waiting list in band C to the 228 households living on the South Kilburn Estate in temporary accommodation.

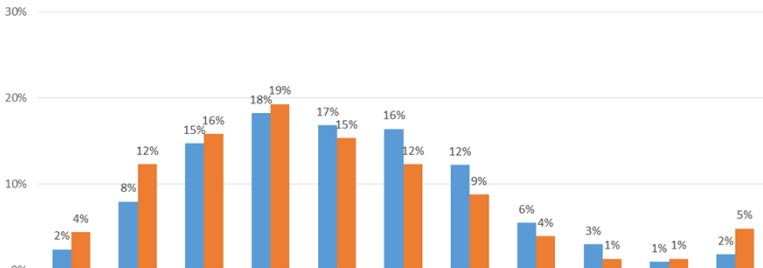
23. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE

Details of impacts identified

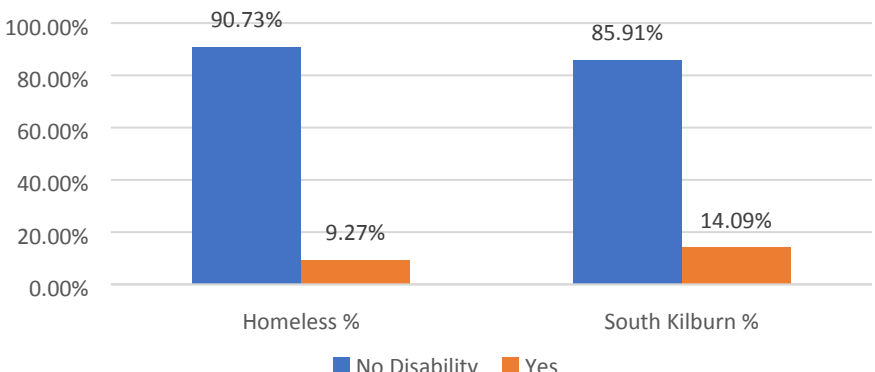
The below graph shows the proportion of homeless applicants by age band compared to the age banding of the 228 homeless applicants living on the South Kilburn Estate.

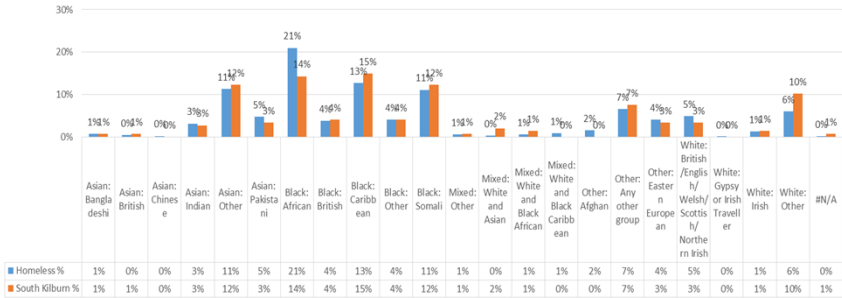
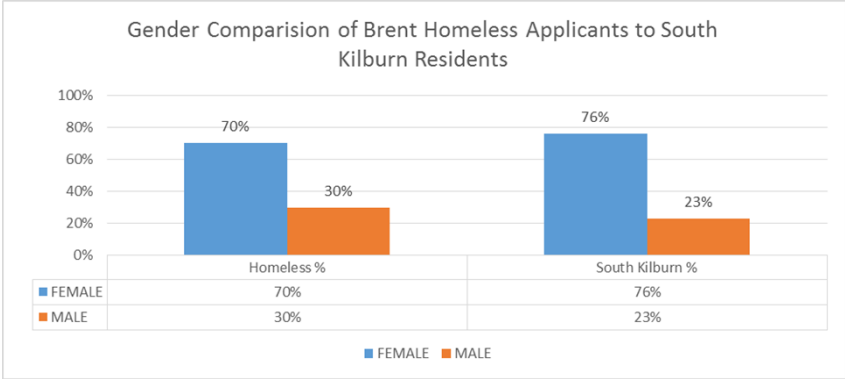
Age of Homeless Applicants compared to South Kilburn Residents



Age Band	Homeless %	South Kilburn %
18-24	2%	4%
25-29	8%	12%
30-34	15%	16%
35-39	18%	19%
40-44	17%	15%
45-49	16%	12%
50-54	12%	9%
55-59	6%	4%
60-64	3%	1%
65-69	1%	1%
70+	2%	5%

The data shows that those on the South Kilburn Estate are proportionately younger than those on the waiting list as well as those aged 65 and over.

	<p>As those on the South Kilburn Estate have been placed there in the last five years of the regeneration programme, we would anticipate a slightly younger group to be living there, as they are newer to homelessness.</p> <p>This also may be due to the property sizes that have become available on these estates. 10% of those on the South Kilburn estate require a 1 bedroom property, which is a much higher proportion than that of the full waiting list, which is 3%. Therefore, there is a higher proportion of childless households on the South Kilburn estate, which may account for the overrepresentation of younger and older households.</p>									
DISABILITY										
Details of impacts identified	<p>The below graph shows the proportion of homeless applicants who have stated they have a disability compared to the 228 homeless applicants living on the South Kilburn Estate.</p> <div><p>Disability of Homeless Applicants compared to South Kilburn Applicants</p><table><thead><tr><th>Group</th><th>No Disability</th><th>Yes</th></tr></thead><tbody><tr><td>Homeless %</td><td>90.73%</td><td>9.27%</td></tr><tr><td>South Kilburn %</td><td>85.91%</td><td>14.09%</td></tr></tbody></table></div>	Group	No Disability	Yes	Homeless %	90.73%	9.27%	South Kilburn %	85.91%	14.09%
	Group	No Disability	Yes							
Homeless %	90.73%	9.27%								
South Kilburn %	85.91%	14.09%								
	<p>We see similar rates of disability in both cohorts and expect no advantage or disadvantage to those with disabilities based on the introduction of this policy.</p> <p>Disability data is available for 11% of the waiting list and 4% of the South Kilburn cohort.</p>									
RACE										
Details of impacts identified	<p>The below graph shows the ethnicity of homeless applicants compared to the 228 homeless applicants living on the South Kilburn Estate.</p>									

	<p data-bbox="715 286 1161 309">Ethnicity of Homeless Applicants compared to South Kilburn Applicants</p>  <p data-bbox="488 725 1409 790">We see similar distribution in the South Kilburn cohort as we do across the all homelessness applicants.</p> <p data-bbox="488 824 1409 889">Ethnicity data is available for 77% of the waiting list and 45% of the South Kilburn cohort.</p>
<b>SEX</b>	
<b>Details of impacts identified</b>	<p data-bbox="488 972 1409 1037">The below graph shows the gender of homeless applicants compared to the 228 homeless applicants living on the South Kilburn Estate.</p>  <p data-bbox="488 1485 1409 1550">We see similar distribution in the South Kilburn cohort as we do across the all homelessness applicants.</p>
<b>SEXUAL ORIENTATION</b>	
<b>Details of impacts identified</b>	<p data-bbox="488 1632 1409 1727">The below graph shows the proportion of homeless applicants by sexual orientation compared to the 228 homeless applicants living on the South Kilburn Estate.</p>

	<div><div>Sexual Orientation of Homeless Applicants compared to South Kilburn Applicants</div><table><thead><tr><th>Sexual Orientation</th><th>Homeless %</th><th>South Kilburn %</th></tr></thead><tbody><tr><td>Bisexual</td><td>0%</td><td>0%</td></tr><tr><td>Heterosexual</td><td>89%</td><td>84%</td></tr><tr><td>Lesbian</td><td>0%</td><td>2%</td></tr><tr><td>Other</td><td>0%</td><td>4%</td></tr><tr><td>Prefer Not to Say</td><td>11%</td><td>11%</td></tr></tbody></table></div> <p>We see similar reported rates in both groups and therefore do not anticipate any impact based on this protected characteristic.</p> <p>Sexual orientation data is only available for 21% of the waiting list and 15% of the South Kilburn cohort.</p>	Sexual Orientation	Homeless %	South Kilburn %	Bisexual	0%	0%	Heterosexual	89%	84%	Lesbian	0%	2%	Other	0%	4%	Prefer Not to Say	11%	11%
Sexual Orientation	Homeless %	South Kilburn %																	
Bisexual	0%	0%																	
Heterosexual	89%	84%																	
Lesbian	0%	2%																	
Other	0%	4%																	
Prefer Not to Say	11%	11%																	
PREGANCY AND MATERNITY																			
Details of impacts identified	<p>There is insufficient data regarding pregnancy or maternity of the households on the waiting list to assess the impact on these groups.</p> <p>We do not however consider there to be any adverse impacts on any household based on their pregnancy.</p>																		
RELIGION OR BELIEF																			
Details of impacts identified	<p>There is insufficient data regarding religion of the households on the waiting list to assess the impact on these groups.</p> <p>2011 Census data provides us with the following information about religion and belief in the wider borough.</p> <table><thead><tr><th>Religion or belief</th><th>Percentage</th></tr></thead><tbody><tr><td>Christianity</td><td>41%</td></tr><tr><td>Islam</td><td>19%</td></tr><tr><td>Hinduism</td><td>18%</td></tr><tr><td>No religion</td><td>11%</td></tr><tr><td>Judaism</td><td>1%</td></tr><tr><td>Buddhism</td><td>1%</td></tr></tbody></table> <p>We do not however consider there to be any adverse impacts on any religious group based on their religion or belief.</p>	Religion or belief	Percentage	Christianity	41%	Islam	19%	Hinduism	18%	No religion	11%	Judaism	1%	Buddhism	1%				
Religion or belief	Percentage																		
Christianity	41%																		
Islam	19%																		
Hinduism	18%																		
No religion	11%																		
Judaism	1%																		
Buddhism	1%																		
GENDER REASSIGNMENT																			

<div>Details of impacts identified</div>	<div><p>There is insufficient data regarding gender reassignment of the applicants accepted as homeless in the last three years to assess the impact on these groups.</p><p>The Diversity in Brent document states that 3,400 people in Brent experience gender variance (based on GLA population projections that equates to 1% of the borough population) Source: Stonewall.</p><p>We do not however consider there to be any adverse impacts on this group based on gender variance.</p></div>
<div>MARRIAGE &amp; CIVIL PARTNERSHIP</div>	
<div>Details of impacts identified</div>	<div><p>The below graph shows the proportion of homeless applicants by marital status compared to the 228 homeless applicants living on the South Kilburn Estate.</p><div><div><div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div></div><div></div></div></div><div><div><div></div><div></div></div><div><div><div><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24. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

The proposal to offer those living in temporary accommodation on the South Kilburn estate prioritises some households over others simply by the where they were placed in TA accommodation. We see a higher proportion of households requiring 1 bedroom properties on the South Kilburn Estate and the nature of those requiring a 1 bedroom property means there is a higher proportion of childless households and we therefore see overrepresentation in younger and older households and households that were never married or in a civil partnership compared to the housing waiting list as a whole.

While the South Kilburn group will benefit from this proposal, the additional homes being built through regeneration will be specified based on the demand of the entire waiting list and therefore offer knock on benefit to the entire group.

25. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Yes, a number of engagement initiatives were undertaken to gather the views of those affected by the changes to the policy as outlined below. Further engagement is not required.

Formal consultation was launched on 12 November 2018 and ended on 21 January 2019, through an on-line consultation survey. As well as advertising the consultation survey on the Council's website, and on the Locata home page, every household currently on the housing register (including Band D) was notified. Consultation workshops were also held with the following stakeholders;

- Members
- Temporary Accommodation User Forums (attended by approximately 500 households over 5 Forums)
- Registered Providers
- Voluntary Sector
- Adult Social Care
- Children's and Young People Services
- Brent Housing Management

As some of the issues that were being consulted on are fairly technical, the purpose of these workshops was to go through each issue in detail and to give people the opportunity to ask questions to clarify what we were asking them to give their opinion on. Attendees were then encouraged to express their opinions via the consultation survey that was made available via the Council's consultation portal.

An independent research company, bmg Research were also commissioned to facilitate 2 workshops on the 12 March 2019. The first workshop was made up of a group of housing professionals and the second made up of a cross section of residents of the borough. The purpose of these workshops was to give people more of an opportunity to debate the implications and express their views of the various proposals and possible impact on households seeking social housing.

26. Please detail any areas identified as requiring further data or detailed analysis.

Data on applicants and households in regards to their protected characteristics, particularly in areas where limited data prevents us drawing any conclusions (as listed below) would help improve our equality analysis.

- Sexual orientation

- Gender reassignment
- Religion or belief
- Pregnancy or maternity
- Marriage

The introduction of a new customer portal from April 2018 where homeless applicants can make an application directly and include their demographic information will help to improve data capture in this area.

27. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

The Council knows that a lot of the households in TA on South Kilburn have been waiting less time for social housing than households in other parts of the borough, but under this change, they would get priority access to the new social houses on South Kilburn. However, it should also be noted that without this change it is unlikely that the South Kilburn regeneration would go ahead, and therefore, these additional homes would not be built.

28. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

All allocations of properties made under this proposal will be monitored in line with the Council's Allocation Scheme and statutory reporting requirements to relevant agencies. Operational meetings.

## **SECTION C - CONCLUSIONS**

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Those positively impacted by this proposal are those who are on the council's waiting list and given temporary accommodation in South Kilburn Estate. As they will be prioritised for a property on the regenerated South Kilburn estate when it becomes available. This gives them an advantage over those who may have been waiting on the waiting list longer but were not given temporary accommodation on South Kilburn estate, effectively allowing them to 'jump the queue'.

It is accepted that this proposal gives an unfair advantage to those households placed in South Kilburn temporary accommodation however as the GLA has changed rules regarding regeneration on estates it is now important that those tenants have a say and a stake in the regeneration on the SK estate.

The regeneration of the South Kilburn estate is aiming to maximise housing on the land and therefore will bring in more supply to meet homelessness demand for the Council.

We can see from the comparative demographic data that no group is advantaged or disadvantaged in this proposal by their protected characteristics.

**SECTION D – RESULT**

<i>Please select one of the following options. Mark with an "X".</i>		
<b>A</b>	<b>CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED</b>	
<b>B</b>	<b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b>	<b>X</b>
<b>C</b>	<b>CHANGE / ADJUST THE POLICY/PROPOSAL</b>	
<b>D</b>	<b>STOP OR ABANDON THE POLICY/PROPOSAL</b>	

**SECTION E - ACTION PLAN**

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

**SECTION F – SIGN OFF**

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Omari Gayle	
<b>REVIEWING OFFICER:</b>	Lavdrim Krashi	
<b>HEAD OF SERVICE:</b>	Laurence Coaker	



### EQUALITY ANALYSIS (EA)

#### Proposal 5 – Quota System Review

<b>POLICY/PROPOSAL:</b>	Quota system review
<b>DEPARTMENT:</b>	Community Wellbeing
<b>TEAM:</b>	Housing Needs
<b>LEAD OFFICER:</b>	Omari Gayle
<b>DATE:</b>	24/04/2019

### SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Under the current Allocation Scheme, quotas exist enabling services to have direct access to social housing for the cohort of households the quota has been arranged for as set out below.

- **Children Leaving Care** - Young people referred by Brent Children and Young People service who are unable to make alternative arrangements.
- **Probation Service** - Applicants nominated to Brent Council by the Probation Service to avoid the risk of reoffending and where housing is a particular issue as judged by the Probation Service in Brent.
- **Children Services** - Existing tenants and non-tenants referred by Brent Social Services where accommodation is needed on grounds of children's welfare e.g. child protection cases.
- **Adult Social Care** - To release supported housing and approved for independent living by Brent Social Services and The Housing Department.
- **Voluntary Sector** – To release supported housing but not known to Adult Social Care, and approved for independent living by Brent Housing Needs.

This amendment is proposing that we abolish the quota system for the cohorts listed above and instead consider referrals on a case by case referral from the service.

In 2015, the Brent Cabinet agreed to use the powers under the Localism Act to break the link between homelessness and social housing under Part 7 of the Housing Act 1996. However, the quota system, which offers direct access to social housing, does not align with this. By abolishing the quota system, we can ensure the allocation of social housing is based on fair and equitable criteria to all.

2. Who may be affected by this policy or proposal?

The proposal affects individuals who have access to these quotas based on the services they are currently engaged with. The below table shows the agreed quotas per annum for each service. There are 50 social housing properties allocated for the quota system per annum.

<b>Service</b>	<b>Children Leaving Care</b>	<b>Probation Service</b>	<b>Children's Services</b>	<b>Adult Social Care</b>	<b>Voluntary Sector</b>	<b>Total</b>
Quota per annum	30	5	5	5	5	50

The table below shows the number of allocations of social housing made under the quota system in the last three years. Individuals supported by these quotas require one-bedroom properties and, where supply has been available; more allocations through these quotas have been accepted.

<b>Year</b>	<b>Children Leaving Care</b>	<b>Probation Service</b>	<b>Children's Services</b>	<b>Adult Social Care</b>	<b>Voluntary Sector</b>	<b>Total</b>
2015/16	40	2	0	2	9	<b>53</b>
2016/17	39	0	0	4	10	<b>53</b>
2018/19	42	2	0	0	5	<b>49</b>
<b>Total</b>	<b>121</b>	<b>4</b>	<b>0</b>	<b>6</b>	<b>24</b>	<b>155</b>

Allocations to care leavers make up 78% of the 155 allocations under the quota in the last three years. The remaining 22% of allocations under the quota system in the last three years has been to applicants accessing services in the Voluntary Sector (15%), adult social care (4%) and probation services (3%).

Those who may be impacted by this proposal are those households who are currently accessing services that enable them to access these quotas.

There are currently 300 children in care in Brent to whom Brent Council has a corporate parent responsibility. Brent Council has a duty to support care leavers into suitable accommodation once they are ready to live independently.

There are currently 524 individuals living in housing related support through the Voluntary Sector. This type of housing is seen as a pathway to achieve independent living with the aim of securing suitable accommodation for the individual within two years.

There are currently 256 individuals living in supported living schemes and 206 in extra care schemes managed by Adult Social Care services. These are individuals with very high needs and independent living is not always an option of them.

Allocations through the Probation Services and Children's Services quotas have been limited in the last three years. Demand is based on exceptional circumstances and so we cannot quantify those immediately impacted by this proposal.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, there is relevance to equality and the council's public sector equality duty as within the cohort of people referred through the quota system some protected groups are over-represented compared to the borough as a whole.

79% of applicants referred through quota system in the last three years (excluding care leavers) were identified as having a physical or mental health disability compared to 14.4% of Brent's population who say their day-to-day activities are limited.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?	X	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
<b>If you have answered YES to ANY of the above, then proceed to section B.</b> <b>If you have answered NO to ALL of the above, then proceed straight to section D.</b>		



## SECTION B – IMPACTS ANALYSIS

29. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

To evaluate the impact of this proposal we have evaluated the groups of individuals currently accessing services these five quotas have been arranged for, the demand from the group, the way they access housing allocations and their likelihood to be impacted by this proposal.

### Children Leaving Care

Children leaving care make up the largest proportion of those accessing social housing through the quota system. While this proposal recommends abolishing all existing quotas, it recommends a new protocol be established with the Children and Young People (CYP) service to establish a Service Level Agreement guaranteeing access to Social Housing for care leavers, along with a shared CYP/Housing Allocation Panel.

This recommendation is made on the basis that the Council has a Corporate Parent responsibility to care leavers and removal of direct access to social housing for this cohort may impact negatively on young people's long-term stability and mental health. Therefore, analysis of Care Leavers has been excluded from this report.

### Voluntary Sector

Individuals accessing housing related support through the voluntary sector are the second biggest beneficiaries of the quota system as social housing is one avenue to achieve independent living for this group.

The 524 individuals accessing housing related support come from the following client groups:

<b>Client group</b>	<b>Number</b>	<b>Percentage</b>
Mental Health	155	30%
Single Homeless	120	23%
Multiple Needs	89	17%
Ex-Offenders	20	4%
Learning Disabilities, Physical Disabilities, Sensory Impairment	51	10%
Young people 18-25	45	9%
Teenage Mums	19	4%
Domestic Violence	19	4%
Complex Needs - Women	6	1%
<b>Total</b>	<b>524</b>	<b>100%</b>

Access to suitable housing is an important outcome for this group and over the last three years, 24 households have been allocated social housing through this scheme.

### Adult Social Care

The 462 individuals accessing supported housing and extra care have the following primary support reasons.

Primary Support Reason	Number	Percentage
Physical Support	187	40%
Learning Disability Support	148	32%
Mental Health Support	102	22%
Support with memory and cognition	22	5%
Other	3	1%
<b>Total</b>	<b>462</b>	<b>100%</b>

There has been low demand from this service over the last three years with just 6 households accessing housing through the quota system. These are individuals with very high needs and independent living is not always an option of them.

#### Probation & Children's Services

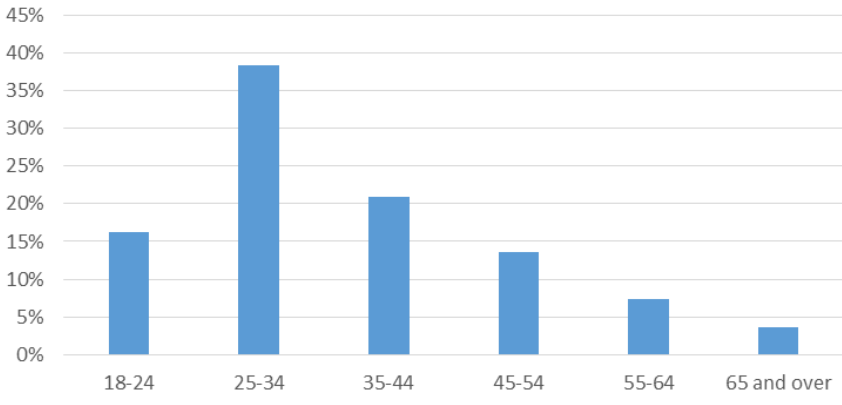
Demand for these quotas is based on referrals in exceptional circumstances and so we cannot quantify those immediately impacted by this proposal. We have analysed the protected characteristics of the four individuals allocated social housing through the Probation Services quota in the last three years. There were no allocations through Children's Services in the last three years.

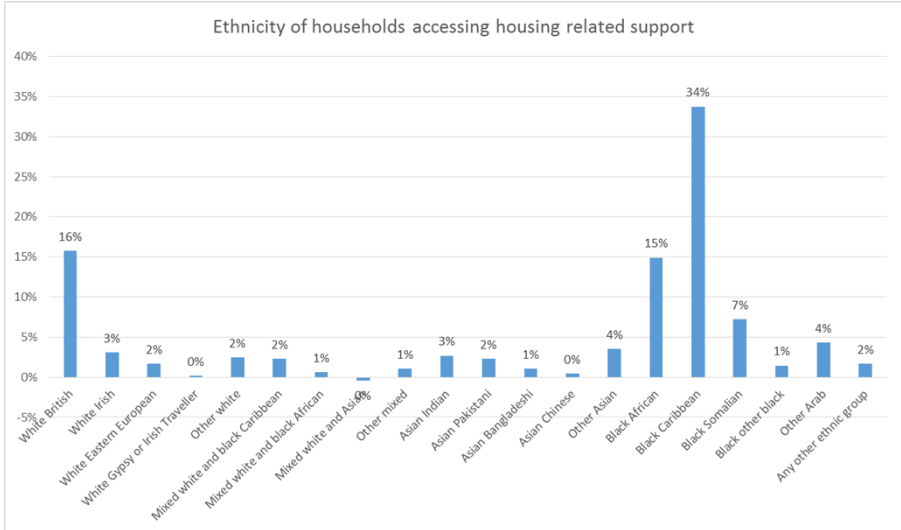
Evaluation of the five groups identified that the key group that will be impacted by this proposal is those accessing housing related support through the voluntary sector. These are the individuals that our analysis will focus on.

We have also analysed the protected characteristics of the individuals who have been housed through the quota system in the last three years through each quota. However, we are mindful that this group is small and may not be representative of future demand.

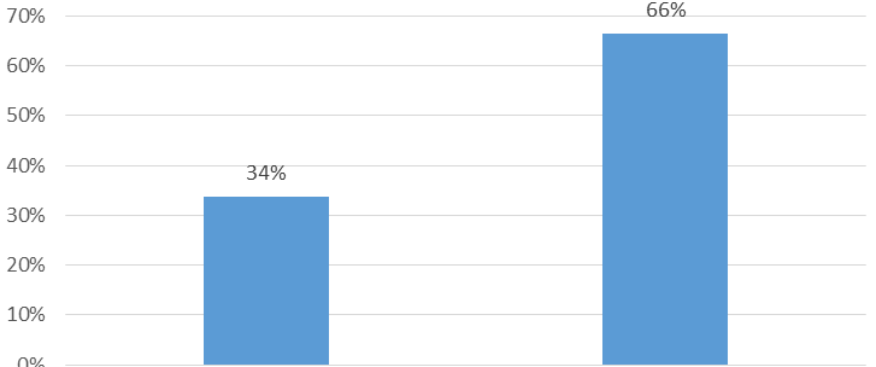
30. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

<b>AGE</b>	
<b>Details of impacts identified</b>	The below graph shows the age banding for households accessing housing related support. Data on age is available for 86% of households.

	<p style="text-align: center;"><b>Age banding of households accessing housing related support</b></p>  <p>Households accessing housing related support are overall a younger cohort than the Brent population. 11% of people in the borough are 65 and over while only 4% (11) of those in supported accommodation are.</p> <p>Of those housed through the quota system in the last three years, none have been aged 65 and over. The below table shows the age banding distribution of those housed through the quota system. We see similar age distribution coming through each of the three quota streams: Adult Social Care, Voluntary Sector and Probation services.</p> <table border="1" data-bbox="491 1209 877 1496"> <thead> <tr> <th>Age banding</th><th>% applicants</th></tr> </thead> <tbody> <tr> <td>16-24</td><td>3%</td></tr> <tr> <td>25-34</td><td>21%</td></tr> <tr> <td>35-44</td><td>26%</td></tr> <tr> <td>45-54</td><td>26%</td></tr> <tr> <td>55-64</td><td>24%</td></tr> <tr> <td><b>Total</b></td><td><b>100%</b></td></tr> </tbody> </table> <p>This is because individuals over 60 are able to access sheltered accommodation and tend to be placed here to meet their needs.</p>	Age banding	% applicants	16-24	3%	25-34	21%	35-44	26%	45-54	26%	55-64	24%	<b>Total</b>	<b>100%</b>
Age banding	% applicants														
16-24	3%														
25-34	21%														
35-44	26%														
45-54	26%														
55-64	24%														
<b>Total</b>	<b>100%</b>														
<b>DISABILITY</b>															
<b>Details of impacts identified</b>	<p>Disability information on individuals in housing related support is not available from the services.</p> <p>However, we can see through client group data above that 11% of those accessing housing related support are accessing this based on Learning Disabilities, Physical Disabilities or Sensory Impairment.</p>														

	<p>Officers do believe the proportion of those with disabilities will be higher than this; however, it is not the primary reason that they are accessing services.</p> <p>Data shows the majority of applicants (79%) who have been placed through the quota system in the last three years have a physical or mental disability. This is 83% of those referred through adult social care and the voluntary sector and 50% of those referred through probation services.</p> <p>We see a high proportion of households with disability or vulnerability indicators placed through the quota system. The proposal to remove the quotas means that assessment of housing priority of these individuals will be carried out on a case-by-case basis. In line with the council's commitment to equality of access, those with a disability who have an information or communication (e.g. hearing impairment or learning disability) are offered support to navigate the housing application process.</p> <p>Housing legislation states that priority need should be given to "a person who is vulnerable as a result of old age, mental illness or handicap or physical disability or other special reason, or with whom such a person resides or might reasonably be expected to reside" (Source: Housing Act 1996, Section 189). Therefore, we do not anticipate any impact based on disabilities.</p>
<b>RACE</b>	
<b>Details of impacts identified</b>	<p>The below graph shows the ethnicity for households accessing housing related support. Data on ethnicity is available for 100% of households.</p>  <p>The data shows that an over-representation of Black households accessing housing related support at 54%, whereas 21% of the Brent</p>



	<p>population is identified as black. Black Caribbean's make up 31% of those accessing housing related support.</p> <p>We see a similar distribution of ethnicity among applicants housed through the quota system in the last three years. 32% of these households were Black Caribbean, 21% were White British.</p> <p>Black African and Caribbean households are also over-represented on the housing waiting list and this is likely to be due to deprivation levels among these communities in the borough.</p>						
<b>SEX</b>							
<b>Details of impacts identified</b>	<p>The below graph shows the gender of households accessing housing related support. Data on gender is available for 83% of applicants.</p> <div data-bbox="486 819 1398 1364"> <p style="text-align: center;"><b>Gender of households accessing housing related support</b></p>  <table border="1"> <thead> <tr> <th>Gender</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Female</td> <td>34%</td> </tr> <tr> <td>Male</td> <td>66%</td> </tr> </tbody> </table> </div> <p>The housing related support data shows much higher rates of males accessing these services.</p> <p>Males also make up 76% of those housed through the quota system in the last three years.</p> <p>We see higher rates of men in housing related support services due to the client groups these services support for example ex-offenders and homelessness services. Nationally males make up 95% of the prison population. (Source: Ministry of Justice Prison, Population Statistics 06 April 2019) and therefore higher rates accessing support services after leaving prison. There is also a higher proportion of males sleeping rough 84% of the national population (Source: MHCLG, Rough Sleeping Statistics Autumn 2018)</p> <p>Anecdotally, officers comment that males tend to access housing related support services due to a breakdown in a relationship, as they will be the ones to leave the family home while women tend to stay with children.</p>	Gender	Percentage	Female	34%	Male	66%
Gender	Percentage						
Female	34%						
Male	66%						

	<p>Women are more likely to access statutory homelessness support as “a person with whom dependent children reside or might reasonably be expected to reside” places them in priority need for accommodation. (Source: Housing Act 1996, Section 189)</p> <p>9% of the clients accessing supported accommodation services are accessing women’s only services for example teenage mums and domestic abuse refuges.</p>								
<b>SEXUAL ORIENTATION</b>									
<b>Details of impacts identified</b>	<p>There is insufficient data regarding sexual orientation of applicants accessing housing related support or those housed through the quota system in the last three years to assess the impact on these groups.</p> <p>Although we do know that LGBTQI people make up between 5 and 7% of the UK population and between 4-6% of Brent’s. (Source: Stonewall and GLA for population projection)</p> <p>We do not however, consider there to be any adverse impacts on this group.</p>								
<b>PREGNANCY AND MATERNITY</b>									
<b>Details of impacts identified</b>	<p>Pregnancy and maternity information on the group accessing housing related support can be derived from the type of supported accommodation they are accessing.</p> <p>4% of those in supported accommodation have accessed it, as they are teenage mums.</p> <p>Those with children or expecting a child are given priority need under homelessness legislation and therefore access to housing support will be available to them through these channels when they are ready to access it.</p> <p>“A person with whom dependent children reside or might reasonably be expected to reside” places them in priority need for accommodation. (Source: Housing Act 1996, Section 189)</p>								
<b>RELIGION OR BELIEF</b>									
<b>Details of impacts identified</b>	<p>There is insufficient data regarding religion of the applicants accessing housing related support or those housed through the quota system in the last three years to assess the impact on these groups.</p> <p>2011 Census data provides us with the following information about religion and belief in the wider borough.</p> <table border="1"> <thead> <tr> <th>Religion or belief</th><th>Percentage</th></tr> </thead> <tbody> <tr> <td>Christianity</td><td>41%</td></tr> <tr> <td>Islam</td><td>19%</td></tr> <tr> <td>Hinduism</td><td>18%</td></tr> </tbody> </table>	Religion or belief	Percentage	Christianity	41%	Islam	19%	Hinduism	18%
Religion or belief	Percentage								
Christianity	41%								
Islam	19%								
Hinduism	18%								

	No religion	11%
	Judaism	1%
	Buddhism	1%
	We do not however consider there to be any adverse impacts on any religious group based on their religion or belief.	
GENDER REASSIGNMENT		
Details of impacts identified	There is insufficient data regarding gender reassignment of the applicants accessing housing related support or those housed through the quota system in the last three years to assess the impact on these groups.	
	The Diversity in Brent document states that 3,400 people in Brent experience gender variance (based on GLA population projections, which equates to 1% of the borough population) Source: Stonewall.	
	We do not however consider there to be any adverse impacts on this group based on gender variance.	
MARRIAGE & CIVIL PARTNERSHIP		
Details of impacts identified	There is insufficient data regarding marital status of the applicants accessing housing related support or those housed through the quota system in the last three years to assess the impact on these groups.	
	However, anecdotally officers are aware that the majority of those in supported accommodation are single with many client groups accessing supported housing due to relationship breakdown. As we see from the data, they also tend to be younger and therefore may not have entered a marriage or civil partnership yet.	
	We do not consider there to be any adverse impacts on this group.	

31. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No, the proposed to abolish the quota system and replace with case-by-case referrals from the service enhances the Public Sector Equality Duty. The new process for review is needs based and aims to eliminate discrimination by ensuring that housing is allocated on the basis of clear criteria.

It advances equality of opportunity in the way that it is a fair and transparent means of allocating homes, recognising that some households require housing more urgently than others, as their needs are greater.

It also ensures all allocation of housing is assessed on the basis of the same set of criteria. This will assist in ensuring that unfair perceptions about the allocation of social housing among both users of the system and residents in general are addressed.

32. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Yes, a number of engagement initiatives were undertaken to gather the views of those affected by the changes to the policy as outlined below. Further engagement is not required.

Formal consultation was launched on 12 November 2018 and ended on 21 January 2019, through an on-line consultation survey. As well as advertising the consultation survey on the Council's website, and on the Locata home page, every household currently on the housing register (including Band D) was notified. Consultation workshops were also held with the following stakeholders;

- Members
- Temporary Accommodation User Forums (attended by approximately 500 households over 5 Forums)
- Registered Providers
- Voluntary Sector
- Adult Social Care
- Children's and Young People Services
- Brent Housing Management

As some of the issues that were being consulted on are fairly technical the purpose of these workshops was to go through each issue in detail and to give people the opportunity to ask questions to clarify what we were asking them to give their opinion on. Attendees were then encouraged to express their opinions via the consultation survey that was made available via the Council's consultation portal.

An independent research company, bmg Research were also commissioned to facilitate 2 workshops on the 12 March 2019. The first workshop was made up of a group of housing professionals and the second made up of a cross section of residents of the borough. The purpose of these workshops was to give people more of an opportunity to debate the implications and express their views of the various proposals and possible impact on households seeking social housing.

33. Please detail any areas identified as requiring further data or detailed analysis.

Data on applicants and households in regards to their protected characteristics, particularly in areas where limited data prevents us drawing any conclusions (as listed below) would help improve our equality analysis.

- Disability
- Sexual orientation
- Gender reassignment
- Religion or belief
- Pregnancy or maternity
- Marriage

Referrals from services will require a full housing application from homeless applicants or their support workers directly and requires all demographic information on an applicant, coming through this process will help to improve data capture in this area.

34. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

We do not anticipate any negative impacts on individuals due to this proposal.

The allocation of social housing is assessed on the basis of the same set of criteria set out in the Allocation Scheme. It is a fair and transparent means of allocating homes, recognising that some households require housing more urgently than others, as their needs are greater.

35. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

All allocations of properties made under this proposal will be monitored in line with the Council's Allocation Scheme and statutory reporting requirements to relevant agencies. Operational meetings.

## SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

The quota referral system is based on an area of inequality in the council. Those accessing services from which quota referrals are accepted are often the most vulnerable in society and certain protected characteristics are therefore overrepresented within this group.

However, the quota system offers direct access to social housing when referred through the quota system, which does not align with other principals of the Council's Allocations scheme. Therefore, by abolishing these quotas it ensures all allocation of housing is assessed on the basis of the same set of criteria set out in the Allocation Scheme. It is a fair and transparent means of allocating homes, recognising that some households require housing more urgently than others, as their needs are greater.

## SECTION D – RESULT

<i>Please select one of the following options. Mark with an "X".</i>		
<b>A</b>	<b>CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED</b>	
<b>B</b>	<b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b>	<b>X</b>
<b>C</b>	<b>CHANGE / ADJUST THE POLICY/PROPOSAL</b>	
<b>D</b>	<b>STOP OR ABANDON THE POLICY/PROPOSAL</b>	

**SECTION E - ACTION PLAN**

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

**SECTION F – SIGN OFF**

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Omari Gayle
<b>REVIEWING OFFICER:</b>	Lavdrim Krashi
<b>HEAD OF SERVICE:</b>	Laurence Coaker

### EQUALITY ANALYSIS (EA)

#### Proposal 6 – Prioritise Unaffordability

<b>POLICY/PROPOSAL:</b>	Give priority to households living in unaffordable accommodation
<b>DEPARTMENT:</b>	Community Wellbeing
<b>TEAM:</b>	Housing Needs Service
<b>LEAD OFFICER:</b>	Omari Gayle
<b>DATE:</b>	24/04/2019

### SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The shortage of supply of both social housing and affordable private rented accommodation in Brent continues to lead to high demand on the Housing Needs Service, and is the major issue that is driving homelessness demand. Due to the gap between the LHA rate and the market rate for private sector accommodation in Brent, the majority of households who are on low incomes or dependent on benefits find it difficult to find affordable accommodation in the private rented sector in Brent. If they do not have a recognised priority as set out in the current Allocation Scheme, they will not be eligible to bid for social housing.

2. Who may be affected by this policy or proposal?

The aim of this proposal is to offer access to affordable housing for households who may be struggling to afford rent in private sector. Therefore, households who are solely dependent on benefits, with rental income higher than the LHA rate would be positively impacted by this proposal.

The introduction of this proposal could disadvantage households in the current band D and non-priority need.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, there is relevance to equality and the council's public sector equality duty as within the cohort of people accessing this service some protected groups are over-represented compared to the borough as a whole.

This is due to the criteria through which priority need is established under the relevant legislation: for example, a household may be regarded as being in priority need owing to age, to a physical disability or mental health condition or to pregnancy. It is also an effect of

poverty and disadvantage: some ethnic groups, for example Black Africans, are over-represented among homeless households. Black Africans make up 21% of current accepted homeless households compared to 7.9% in the wider borough.

(Source: 2016 population from GLA)

4. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age	X		X
Sex	X		X
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?	X	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
<b>If you have answered YES to ANY of the above, then proceed to section B.</b> <b>If you have answered NO to ALL of the above, then proceed straight to section D.</b>		





**SECTION B – IMPACTS ANALYSIS**

36. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

To assess the impacts of this proposal we have gathered from housing benefit assessors on those who are likely to be wholly dependant on benefits and paying a shortfall to their rent.

We have excluded any shortfall occurring due to non-dependant deductions from the data supplied to make this assessment. Non- dependant deductions have been excluded as shortfall due to non-dependants is deemed as an apportionment of rent due to be paid by the non-dependant.

The below table shows tenure types of claimants. We have focussed only on claimants currently in tenures types of LHA and ODRT, as these are the households leasing in the private sector. All other claimants are in temporary accommodation or some form of social housing.

Tenure Code	Tenure Description
HA	Housing Association
HLA	Homeless person in licensed accommodation
LHA	Local Housing Allowance – Private leases
NDRT	PT New Deregulated Tenancies – Temporary accommodation tenancies now superseded by LHA tenancies
ODT	Oct Deregulated Tenancy – Now superseded by LHA tenancies

The below are the benefits we have included in the assessment:

- DLA Care Comp Higher NOTE AWARDS SDP
- DLA Care Comp Lower WARNING NO SDP
- DLA Care Middle Note Awards SDP
- DLA Mobility Comp Check Care for SDP
- ESA Main Phase Income Related
- Incapacity Ben Long Term rate
- Incapacity Ben Lower Rate
- Job Seekers All Income Based
- JSA Contribution Based
- PIP Daily Living Enhanced
- PIP Daily Living Standard

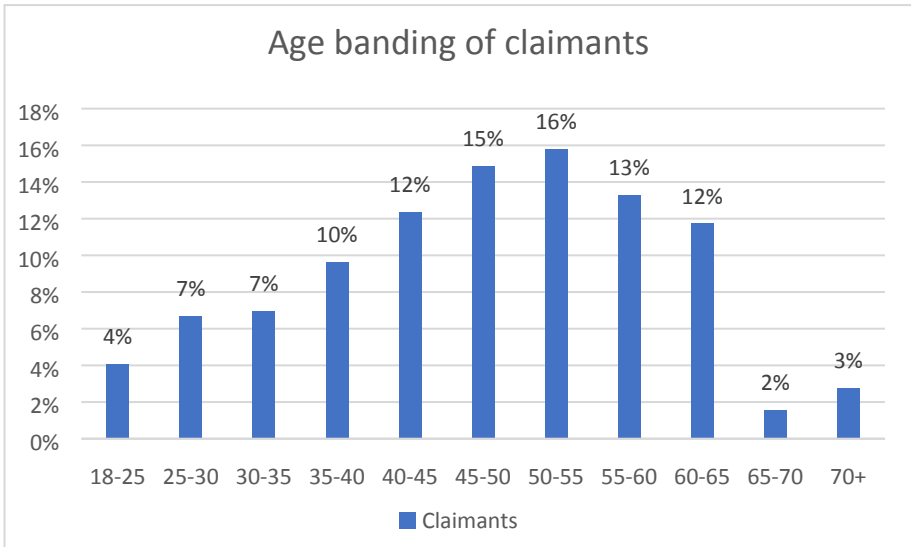
Note these were selected only after we identified the group paying a shortfall in rent, other benefits may be applicable however were not present in this group.

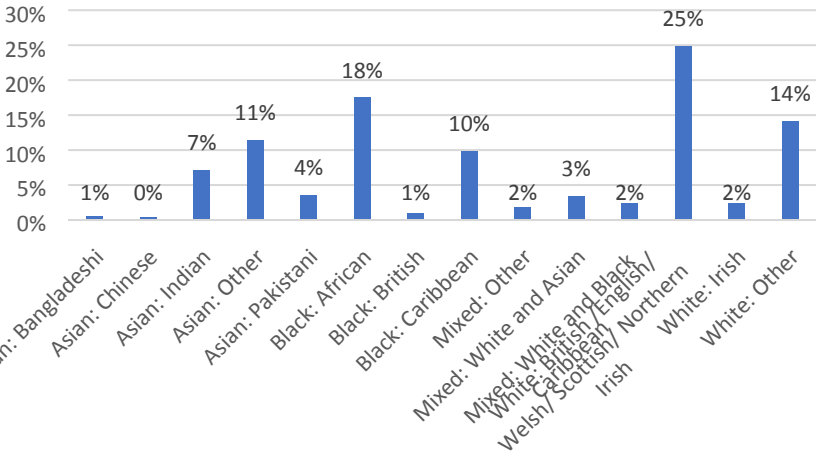
The below table shows the number and percentage of current claimants based on the amount of shortfall they are paying per week.

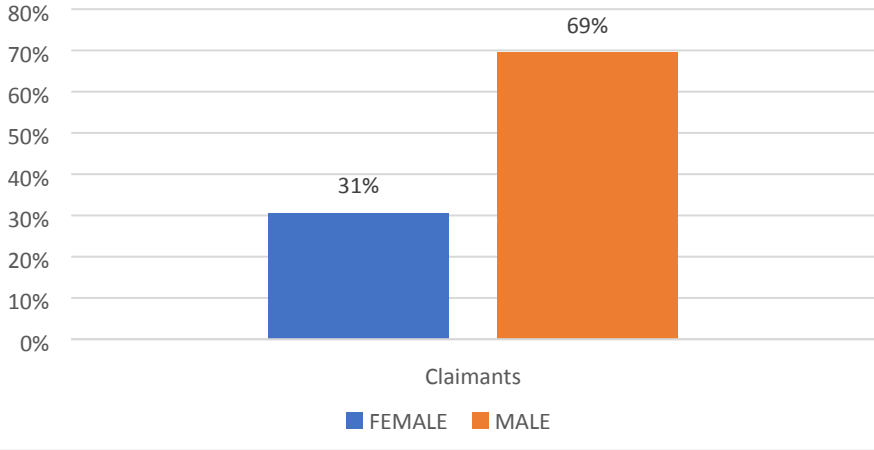
Shortfall banding	Claimants	%
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Under £5	98	9%
£5 - £49.99	691	60%
£50 - £99.99	270	23%
over £100	92	8%
<b>Total</b>	<b>1,151</b>	<b>100%</b>

37. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE																									
Details of impacts identified	<p>The below graph shows the claimants potentially impacted by age band.</p> <div><p>Age banding of claimants</p><table><thead><tr><th>Age Band</th><th>Percentage of Claimants</th></tr></thead><tbody><tr><td>18-25</td><td>4%</td></tr><tr><td>25-30</td><td>7%</td></tr><tr><td>30-35</td><td>7%</td></tr><tr><td>35-40</td><td>10%</td></tr><tr><td>40-45</td><td>12%</td></tr><tr><td>45-50</td><td>15%</td></tr><tr><td>50-55</td><td>16%</td></tr><tr><td>55-60</td><td>13%</td></tr><tr><td>60-65</td><td>12%</td></tr><tr><td>65-70</td><td>2%</td></tr><tr><td>70+</td><td>3%</td></tr></tbody></table></div>	Age Band	Percentage of Claimants	18-25	4%	25-30	7%	30-35	7%	35-40	10%	40-45	12%	45-50	15%	50-55	16%	55-60	13%	60-65	12%	65-70	2%	70+	3%
	Age Band	Percentage of Claimants																							
	18-25	4%																							
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45-50	15%																								
50-55	16%																								
55-60	13%																								
60-65	12%																								
65-70	2%																								
70+	3%																								
<p>The graphs shows that claimants within this cohort tend to be within the 25-64 age range with younger and older groups under represented compared to Brent population data. 11% of the overall population of Brent is 65 and over while only 5% of this group are 65+. 12% of the overall population of Brent are aged 16-24 while only 4% of this group are under 25.</p>																									
<p>If this proposal is introduced, we should consider offering it to a wider group of claimants for example those receiving a pension benefit, to enable a wider age group to benefit.</p>																									

<b>DISABILITY</b>																															
<b>Details of impacts identified</b>	<p>Data available shows 7% of claimants are identified as disabled, a lower proportion than those in the Brent population of 14%.</p> <p>Data available shows only those identified as disabled. Therefore we are not able to distinguish between those claimants who have identified as not disabled and those where this data is unknown.</p>																														
<b>RACE</b>																															
<b>Details of impacts identified</b>	<p>The below graph shows the claimants potentially impacted by ethnicity.</p> <div data-bbox="483 757 1390 1317"> <p style="text-align: center;"><b>Ethnicity of claimants</b></p>  <table border="1"> <thead> <tr> <th>Ethnicity</th> <th>Percentage</th> </tr> </thead> <tbody> <tr><td>Asian: Bangladeshi</td><td>1%</td></tr> <tr><td>Asian: Chinese</td><td>0%</td></tr> <tr><td>Asian: Indian</td><td>7%</td></tr> <tr><td>Asian: Other</td><td>11%</td></tr> <tr><td>Asian: Pakistani</td><td>4%</td></tr> <tr><td>Black: African</td><td>18%</td></tr> <tr><td>Black: British</td><td>1%</td></tr> <tr><td>Black: Caribbean</td><td>10%</td></tr> <tr><td>Mixed: Other</td><td>2%</td></tr> <tr><td>Mixed: White and Asian</td><td>3%</td></tr> <tr><td>Mixed: White and Black</td><td>2%</td></tr> <tr><td>White: British/English/Welsh/Scottish/Irish</td><td>25%</td></tr> <tr><td>White: Irish</td><td>2%</td></tr> <tr><td>White: Other</td><td>14%</td></tr> </tbody> </table> </div> <p>Black and white ethnicities are over represented in this group while Asian ethnicities are underrepresented compared to the Brent population.</p> <p>Ethnicity information is unknown for 40% of this group.</p>	Ethnicity	Percentage	Asian: Bangladeshi	1%	Asian: Chinese	0%	Asian: Indian	7%	Asian: Other	11%	Asian: Pakistani	4%	Black: African	18%	Black: British	1%	Black: Caribbean	10%	Mixed: Other	2%	Mixed: White and Asian	3%	Mixed: White and Black	2%	White: British/English/Welsh/Scottish/Irish	25%	White: Irish	2%	White: Other	14%
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<b>SEX</b>																															
<b>Details of impacts identified</b>	<p>The below graph shows the claimants potentially impacted by gender.</p>																														

	<p style="text-align: center;"><b>Gender of claimants</b></p>  <p>69% of claimants in this group are male, which is a much higher proportion than the borough population data, which is 49%.</p> <p>We know that housing is an area of inequality in gender due to the criteria through which priority housing need is established under the relevant legislation, for example pregnancy and children. Female-headed households make up over half of the council's housing waiting list and those living in council housing.</p> <p>Introducing this proposal may positively impact males and offer access to housing services that may not have been available in the past.</p> <p>Gender information is unknown for 39% of this group.</p>
<b>SEXUAL ORIENTATION</b>	
<b>Details of impacts identified</b>	There is insufficient data regarding sexual orientation to assess the impact on this group.
<b>PREGANCY AND MATERNITY</b>	
<b>Details of impacts identified</b>	There is insufficient data regarding pregnancy and maternity to assess the impact on this group.
<b>RELIGION OR BELIEF</b>	

<b>Details of impacts identified</b>	There is insufficient data regarding religion or belief to assess the impact on this group.
<b>GENDER REASSIGNMENT</b>	
<b>Details of impacts identified</b>	There is insufficient data regarding gender reassignment to assess the impact on this group.
<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>	
<b>Details of impacts identified</b>	There is insufficient data regarding marriage & civil partnership to assess the impact on this group.

38. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

This proposal offers to enhance access to the housing waiting list for applicants based on affordability in their current housing situation. Housing applications are reviewed based on needs and aims to eliminate discrimination by ensuring that housing is allocated on the basis of clear criteria.

39. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Yes, a number of engagement initiatives were undertaken to gather the views of those affected by the changes to the policy as outlined below. Further engagement is not required.

Formal consultation was launched on 12 November 2018 and ended on 21 January 2019, through an on-line consultation survey. As well as advertising the consultation survey on the Council's website, and on the Locata home page, every household currently on the housing register (including Band D) was notified. Consultation workshops were also held with the following stakeholders;

- Members
- Temporary Accommodation User Forums (attended by approximately 500 households over 5 Forums)
- Registered Providers
- Voluntary Sector
- Adult Social Care
- Children's and Young People Services
- Brent Housing Management

As some of the issues that were being consulted on are fairly technical the purpose of these workshops was to go through each issue in detail and to give people the opportunity to ask questions to clarify what we were asking them to give their opinion on. Attendees were then encouraged to express their opinions via the consultation survey that was made available via the Council's consultation portal.

An independent research company, bmg Research were also commissioned to facilitate 2 workshops on the 12 March 2019. The first workshop was made up of a group of housing professionals and the second made up of a cross section of residents of the borough. The purpose of these workshops was to give people more of an opportunity to debate the implications and express their views of the various proposals and possible impact on households seeking social housing.

40. Please detail any areas identified as requiring further data or detailed analysis.

Data on claimants in regards to their protected characteristics, particularly in areas where limited data prevents us drawing any conclusions (as listed below) would help improve our equality analysis.

- Disability
- Sexual orientation
- Gender reassignment
- Religion or belief
- Pregnancy or maternity
- Marriage

41. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

42. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

All allocations of properties made under this proposal will be monitored in line with the Council's Allocation Scheme and statutory reporting requirements to relevant agencies. Operational meetings.

## **SECTION C - CONCLUSIONS**

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

This proposal offers an opportunity for a new group to access housing services based on unaffordability. We can see through analysis of protected characteristics that this group brings different characteristics to those on the current waiting list for example there is a higher proportion of males represented.

However adding extra demand to the current waiting list gives unrealistic expectations to this group. As the average number of social housing units that become available each year is approximately 600, the majority of these households will never receive an offer of social housing. Additionally, being part of the register will create a significant additional workload for the Council.

It is therefore recommended that this proposal be not approved on the basis that the supply of social housing will never realistically be able to meet this demand, but will give false hope to these households that they will receive an offer.

## SECTION D – RESULT

<i>Please select one of the following options. Mark with an "X".</i>		
<b>A</b>	<b>CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED</b>	
<b>B</b>	<b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b>	
<b>C</b>	<b>CHANGE / ADJUST THE POLICY/PROPOSAL</b>	
<b>D</b>	<b>STOP OR ABANDON THE POLICY/PROPOSAL</b>	<b>X</b>

## SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

<b>Action</b>	<b>Expected outcome</b>	<b>Officer</b>	<b>Completion Date</b>

## SECTION F – SIGN OFF



Please ensure this section is signed and dated.

<b>OFFICER:</b>	Omari Gayle
<b>REVIEWING OFFICER:</b>	Lavdrim Krashi
<b>HEAD OF SERVICE:</b>	Laurence Coaker

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## Appendix to Brent Council's Allocations Scheme

### **Policy – Council's Housing Offer for Displaced Tenants and Leaseholders in Regeneration Schemes**

1. Estate regeneration schemes undertaken by the council or other social landlords, can involve serious disruption for residents, particularly where a scheme requires the demolition and replacement of existing housing. Brent has significant past and current experience in managing such schemes but there is a need to review the approach. In doing this, it should be emphasised that, in the majority of cases, the solutions are relatively straightforward: tenants will be able to move to a new home on similar tenure and rent terms, while most leaseholders will be in a position to buy a new home in the area or elsewhere, either outright or on a shared ownership basis. In most cases, moves will therefore be facilitated by voluntary agreement. However, experience in Brent and elsewhere indicates that there will often be a small number of households who, because they lack the resources or are vulnerable in some way, will not be able to take advantage of the standard options, particularly in areas of high house prices such as London. While the numbers involved may not be large, it is important that Brent's offer should be as comprehensive as possible and also applicable where new options could address issues of supply, mobility and best use of stock.
2. The Council's Cabinet will make a decision on a case by case basis whether it is more appropriate to regenerate an area on a phased programme or a one phased approach and this will include whether to have a local lettings / allocation policy for the regeneration area. The Council's will consider applying to the Secretary of State to rely on Ground 10A of Schedule 2 of the Housing Act 1985 to obtain vacant possession of properties that are part of a relevant regeneration scheme. The Council's Cabinet may, subject to the approval of the Secretary of State, also make a CPO under section 226(1)(a) of the Town and Country Planning Act 1990 to acquire all interests in land surrounding and including the area to be regenerated, including seeking vacant possession of properties in the regeneration area where secure tenants and resident leaseholders reside.
3. In establishing rights to compensation and rehousing, it is necessary to distinguish between different modes of occupation as summarised in the table below. One should note that the balance between resident and non-resident leaseholders is variable and each scheme will have its own characteristics.

<b>Occupancy Status</b>	<b>Housing Options</b>	<b>Compensation</b>
<b>Resident Leaseholder –</b> Normally in occupation for 12 months prior to council notification of intention to acquire	Purchase in regeneration area or elsewhere, including shared ownership and shared equity	Full market value, Home Loss and Disturbance payment plus related expenses.

	Reversion to tenancy	
<b>Non-resident Leaseholder</b> – e.g. owns or rents a home elsewhere and rents out the relevant property	No obligation to rehouse in most circumstances.  Leaseholders temporarily absent would be classed as resident.	Full market value plus compensation (Basic Loss Payment at a lower level than resident leaseholder)
<b>Secure Tenant</b>	Offer of new property in regeneration area or option to move to another part of the borough.  Subject to Local Lettings Plan, which may vary from the council's main Allocation Scheme  Where agreement cannot be reached, council can seek possession if suitable alternative accommodation is made available  One move is the norm, but a temporary move prior to a permanent offer may be necessary in some cases	Home Loss and Disturbance Payment
<b>Tenant of non-resident Leaseholder</b>	No rehousing obligation but, in some cases, households may be able to make a	Advice and assistance in finding a new rented home, usually in the private rented sector

	homelessness application	
<b>Licensee (temporary accommodation)</b>	Where properties are in use as temporary accommodation for households owed a homelessness duty, a move to alternative temporary accommodation or permanent rehousing would be offered in line with the council's legal obligations and homelessness policies. This would not fall into the options set out in this report.	As the property is occupied under a licence, there is no entitlement to compensation but advice and assistance would be available on the same basis offered to all households in temporary accommodation.
<b>Unauthorised occupant</b> – e.g. squatter or illegal sub-tenant	No rehousing obligation but, in some cases, households may be able to make a homelessness application	Advice and assistance in finding a new rented home, usually in the private rented sector

4. It is worth emphasising that, to qualify for full compensation and rehousing options, leaseholders must be resident at the relevant point in the process, usually defined as 12 months before a set date, normally at the point the council announced its intention to proceed with purchase and/or Compulsory Purchase Order (CPO). This is not an absolute cut off and the key distinction is that the property should be the occupier's only or permanent home. For example, a buy-to-let landlord who is renting the property out would not be resident. A leaseholder who is temporarily absent, for work or other reasons, and is renting a home elsewhere would be classed as resident. It is also a requirement that a leaseholder or tenant must have owned or rented the home for 12 months to qualify for Home Loss payments. A non-resident leaseholder will receive market value for the property and other compensation at a lower level than Home Loss payment but will not be entitled to take up rehousing options.
5. The basic options – market purchase in the area or elsewhere and shared ownership – are all available in Brent but the aim in this policy is to go further, to maximise choice and secure a better match with individual circumstances. Any policy is unlikely to cover all possible permutations and there will be a need for flexibility in complex or sensitive cases where a solution outside general policy may be called for;

this policy is intended to be a guide to residents and officers, not a rigid set of rules. The following paragraphs summarise the options in this policy. In all cases, the underlying principles are:

- There will be early and detailed engagement and advice and support will be offered, collectively and individually.
- A presumption that affected tenants and leaseholders will be supported to remain in the area wherever possible.

6. In regeneration schemes, the basic options that are available to displaced tenants and leaseholders are as follows:

- ☐ **Market purchase in the regeneration area;** This option is available and will remain the default position. All displaced leaseholders will be offered the opportunity to purchase one of the new homes, with advice and support available as needed.
- ☐ **Market purchase elsewhere;** Displaced leaseholders may choose to buy a property anywhere else if they do not wish to remain in the area or decide that it is not affordable and do not wish to pursue an alternative option. This option available. In addition, there may be potential to combine this approach with the council's current programme of acquisitions of market housing.
- ☐ **Shared ownership on the basis of a minimum purchase of 25% of the equity, funded through the buyback receipt and a contribution from Home Loss payments and, where appropriate, any other capital or savings, with rent payable on the share retained by the council;** Under a shared ownership arrangement the leaseholder purchases a proportion of the equity, with the housing provider retaining ownership of the remainder. Rent is payable on the proportion retained by the provider in addition to any mortgage payment. It is usually expected that the price received for the original home, any home loss payment (usually 50%, although some boroughs require 100%) and any other savings or capital (usually on a voluntary basis or above a set limit) will contribute to the purchase. Most schemes assume a purchase of at least 25% of the equity, although it would usually be possible for a leaseholder to purchase a higher share. This option is available. As with an outright purchase, there is potential to combine this approach with the council's current programme of acquisitions of market housing in limited cases where this could improve affordability and choice.

7. There are also other options which the Council will consider in this policy and they are set out below:

(i) a shared equity option, with no rent payable on the equity retained by the council, to be considered subject to a minimum purchase of 50% of the equity. This only applies to resident leaseholders.

Resident leaseholders use funds available from buyback to purchase a percentage of the equity of a new property as with shared ownership. Any value gap is then met by the council or a development partner, depending on the nature of the regeneration scheme and is entered as a charge against the property. The leaseholder will not pay rent on the equity they do not own.

(ii) the offer of a leasehold swap option, through which a leaseholder can transfer the equity in their current home into a void council property within (provided the property is not scheduled for

demolition) or outside the regeneration area.

The Council will give consideration to making such an offer. This would enable a leaseholder to transfer their equity into a void council social rented unit that is not due for demolition. This could apply to retained units in South Kilburn (or future schemes) or it could be made available more widely to apply to all council voids of appropriate size and value. Any difference in value would be made up by the council or the leaseholder as appropriate. This swap would reduce upfront acquisition costs but involves the loss of a unit that would otherwise be available at a social rent. The quid pro quo therefore is that an additional replacement social rented unit would need to be provided in the relevant phase.

(iii) where it would be to the council's advantage or will assist in meeting needs that could otherwise delay a regeneration programme, advance purchase of properties scheduled for demolition will be considered.

(iv) where it would be to the council's advantage or will assist in meeting needs that could otherwise delay a regeneration programme, advance payment of Homes Loss and Disturbance compensation to leaseholders and tenants will be considered.

The Council will give consideration to making such an offer. In some cases, it will be to the council's advantage to acquire properties that are scheduled for demolition in advance of the regeneration programme being implemented. For example, in cases where a leaseholder has an urgent need to move for other reasons. While there are costs associated with this approach, it provides additional flexibility and, where appropriate, the ability to use the vacated property in other ways, for example as temporary housing with associated savings on temporary accommodation costs. To assist in mitigating the impact of displacement and enable residents to remain in the area (should they wish to do so), in some cases, the council will consider approve advance compensation payments to leaseholders before a CPO is confirmed; for example, following a Cabinet resolution to proceed and the consequent suspension of the Right to Buy. An additional option would be to confirm purchase with delayed completion: that is, pay the leaseholder a large proportion (say 90%) of the value with the remainder paid on vacation. This would give the leaseholder more time as well as the necessary funds to buy. Consideration should be given to a similar approach for compensation to tenants that would allow the offer of home loss prior to action to seek possession through Ground 10A of Schedule 2 to the Housing Act 1985.

(v) in limited cases subject to detailed review, consideration will be given to the option of reversion to the tenancy in acquired private sector property to be offered to leaseholders unable to pursue any other option, with buyback prices based on full market value. This would also be considered for other leaseholders or tenants who wish to pursue this option.

Also, this would allow a leaseholder who no longer wishes, or cannot afford, to be a property owner to be offered a tenancy, either within the regeneration area or elsewhere. One difficulty here is that, having received payment for the sale plus other payments, such leaseholders would have assets well above the £50,000 limit imposed by the council's Allocation Scheme, although they may also have an income below the current limits, set out below:

- ☐ 1 bed need – £35,000 per annum
- ☐ 2 bed need – £45,000 per annum
- ☐ 3 bed need – £55,000 per annum
- ☐ 4 bed need – £70,000 per annum

(vi) consideration will be given to providing support and advice to vulnerable households (displaced secure tenants and leaseholders) to secure supported housing where required, including the option of reversion to tenancy in Extra Care, or similar provision where necessary.

(vii) the council will consider purchasing properties tailored to the needs of under-occupiers to release larger homes for renting within existing acquisition programmes. This can include purchase in the private sector or buy-back from leaseholders of smaller properties seeking to sell.


(viii) the council will consider developing a programme to buy back properties from leaseholders who need to move on grounds of ill-health, disability or vulnerability, offering the full range of options available to displaced leaseholders in regeneration schemes.

(ix) That the council will consider offering, where appropriate, temporary rehousing for vulnerable leaseholders affected by major works programmes, with a requirement for leaseholders to meet associated charges for such properties.

This would allow some flexibility to allow for temporary rehousing of leaseholders where it is clear that they would be unable to make their own arrangements. The leaseholder would be required to fund any rent and/or service charges associated with the procured property.

8. As for those who are placed in temporary accommodation in regeneration areas by the Council, their rights to priority to housing in the relevant regeneration process are set out in the Council's allocations policy.



	<b>Cabinet</b> 17 June 2019
	<b>Report from the Assistant Chief Executive</b>
<b>Brent Community Lottery Proposal</b>	

<b>Wards Affected:</b>	All
<b>Key or Non-Key Decision:</b>	Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>No. of Appendices:</b>	Two: <ul style="list-style-type: none"> <li>Appendix 1 - Comparison of Lottery Providers</li> <li>Appendix 2 - Lottery Screenshots</li> </ul>
<b>Background Papers:</b>	None
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	Jackie Barry-Purssell, Partnerships and Engagement Manager 020 8937 1958 <a href="mailto:Jacqueline.barry-purssell@brent.gov.uk">Jacqueline.barry-purssell@brent.gov.uk</a>  Pascoe Sawyers – Head of Strategy and Partnerships 020 8937 1045 <a href="mailto:Pascoe.sawyers@brent.gov.uk">Pascoe.sawyers@brent.gov.uk</a>

## 1.0 Purpose of the Report

1.1 To present a Brent Community Lottery proposal to Members.

## 2.0 Recommendation(s)

2.1 For Cabinet to approve the following recommendations;

- (a) To establish a local authority run Lottery called the Brent Community Lottery based on the preferred option and to approve the criteria for registering organisations as beneficiaries.
- (b) To note that the purpose of the lottery is to raise funds for Brent's Voluntary and Community Sector (VSC).

- (c) To waive the requirement of Contract Standing Orders to seek quotes and appoint Gatherwell Ltd. by way of a direct award as an external lottery manager (ELM) to run the lottery on behalf of the council for a period of 5 years, subject to annual review.
- (d) To delegate authority to the Assistant Chief Executive following consultation with the Portfolio Holder for Public Health, Culture & Leisure (given their remit in relation to Voluntary Sector Liaison and Development), to agree the policies and procedures necessary and/or desirable to fulfil the conditions for obtaining a licence from the Gambling Commission and the process for the allocation of the lottery central fund income.
- (d) To nominate two senior managers – (Assistant Chief Executive and the Head of Strategy and Partnerships) - to hold the Gambling Commission licence on behalf of the local authority.
- (f) To note that set up costs will be taken from the Strategy and Partnerships approved budget for 2019/20.

### **3.0 Detail**

- 3.1 This report sets out plans to introduce a Community Lottery in Brent to raise funds to support local Good Causes in the Borough. It also seeks to further our commitment to work with the Voluntary and Community Sector to support it to access alternative sources of funding. This approach is central to the achievement of the overall vision for the borough as set out in the Borough Plan 2019 – 2023. This vision is:

#### ***To make Brent a borough of culture, empathy, and shared prosperity***

- 3.2 A Brent Community Lottery has the potential to help alleviate some of the pressures on the council's funding for the Voluntary and Community Sector (VCS) by bringing in more funding whilst at the same time enabling the VCS to raise money directly by accessing a lottery product designed for them at no cost to them.
- 3.3 The Community Lottery is regulated by the Gambling Act 2005, Society Lotteries were created to allow for the distribution of lottery proceeds collected by non-commercial societies, local authorities and External Lottery Managers (ELMs). Lotteries must deliver a minimum of 20% of proceeds to Good Causes. The model proposed for the Brent Community Lottery delivers 50% to Good Causes and 10% to the council's central fund from each ticket sold.
- 3.4 Local authority lotteries that are promoted by councils permit the authorities to use the net proceeds of such lotteries for any purpose for which they have power to incur expenditure. A local authority lottery must apply 20% of the gross proceeds of the lottery directly to the purpose for which the authority has power to incur expenditure. Up to a maximum of 80% of the gross proceeds of a lottery may be divided between prizes and the expenses of the lottery.
- 3.5 As a local authority the council will have to be licensed by the Gambling Commission to operate a lottery. The maximum prize in a single lottery for a local authority lottery is £25,000 or 10% of the proceeds (gross tickets sales).

The statutory limit for a maximum single prize is £400,000. Rollovers are permitted provided the maximum single prize limit is not breached. There is no maximum price of a lottery ticket. Every ticket must be the same price and the cost of purchased tickets must be paid to the local authority before entry into the draw is allowed. Local authority lotteries which allow players to participate in their lottery by means of remote communication will be required to hold a remote operating licence.

## The Lottery Market Place

- 3.6 There are three well-known national lotteries running in England and Wales – the National Lottery, Health Lottery and the Postcode Lottery. A comparison table is set out below:

Provider	Jackpot Odds	Any prize odds	% to Good Causes	% to operator costs
Euro millions	1:14m	1:54	28%	22%
Health Lottery	1:2m	1:209	20%	22%
Postcode Lottery	No data	No data	27.5%	32.5%

- 3.7 The local authority lottery model operates at two levels:

**The Central Fund** – operating borough wide, where 60% of the ticket price goes to the central fund to be awarded to VCS by the council's chosen process. All monies raised by the lottery for the central fund can either be used to increase the council's existing community grant funding budget or can be used to replace/reduce committed funding, thereby releasing general funds back to council. The chosen areas could be based on thematic or priority areas and reviewed on a regular basis to ensure they align with borough priorities.

**A Specific Good Cause** – of the 60% mentioned above - 50% of the ticket price goes directly to the good cause (i.e. a Brent community organisation) with the other 10% going to the central fund. Groups sign up and have their own web page created to enable them to encourage supporters to raise income via the lottery at no cost to the groups.

- 3.8 Over 50 local authorities in England have introduced a local lottery as an alternative way of raising money for local Good Causes. For example, in Aylesbury Vale – the Lottery was launched in December 2015, and by September 2017 they were raising £120k per year from the lottery from which £63k per year has been allocated to local Good Causes. Currently about 2% of the population (the population of Aylesbury Vale is 174,137) is playing the lottery and their business plan projects this increasing up to 5%. 40 Good Causes were signed up to be part of the lottery before the first tickets were sold, at the last count they now have 180 Good Causes signed up. Currently the London Borough of Bexley and Barking and Dagenham are running a local authority lottery with income raised £59K and £40k respectively. We have had discussions with both councils to gain insight into their approaches. Organisations that are part of the lottery scheme have found they are benefiting from a small, but regular and unfettered income stream. For example, Aylesbury Vale Homestart is receiving about £800 per year from the lottery and the local cricket club is receiving £2,500-£3,000 per year.

- 3.9 We have also sought the views of a sample of local VCS organisations about their views and interest in a local lottery which have been positive.

## **Analysis and Conclusion**

- 3.9 A review of available delivery options for the lottery has been undertaken and the options are explained below. The lottery delivery options are all online with weekly draws. The costs and management associated with the sale of tickets in any other way are prohibitive. An online approach is in line with Brent Council's strategy to become a digital borough.

## **Options for Delivery**

- 3.10 For a local authority to run a lottery there are three management options;
- Deliver in house
  - Through a small society lottery
  - With an External Lottery Manager (ELM)

### **Option 1 - In-house**

In order to operate a lottery in-house it would be necessary to create dedicated licensed, lottery posts. Brent would also need a dedicated IT system and other systems to run it. This option has not been costed as it would involve a new software system and a licensed manager to run the lottery. Aylesbury Vale (in their research) costed this to be approximately £80 - £100K. This option is not recommended.

### **Option 2 - Through a small society lottery provider**

A small society lottery is not required to hold a licence from the Gambling Commission but does need to be licenced by the local authority. Prize money cannot exceed £20,000. This type of lottery provider tends to be smaller clubs, groups and societies with small numbers of members. This option is not recommended.

### **Option 3 – With an External Lottery Manager (ELM)**

An ELM makes arrangements for a lottery on behalf of a local authority and is licensed as an ELM with the Gambling Commission. A local authority and an ELM must be separate entities. An ELM can be employed to manage all or parts of a local authority lottery. This option enables Brent to partner with an established and experienced ELM who are in effect brought in to deliver the lottery.

- 3.11 All ELMs undertake responsibility for managing on-line lottery ticket sales and prize management. There are also three main options in the additional support that they can provide for local authority lotteries:

#### **a) Local Authority Specific online platform**

This option provides a Brent only online platform and includes pages and support for Good Causes. The council will need to apply for a Gambling licence, approve the Good Cause applications via the ELM management system, allocate the central fund income and support the lottery with agreed press, PR and marketing to ensure continued support.

**b) Multiple local authority online platform**

This option provides Brent and Brent's Good Causes with a shared online platform as part of a lottery which is run by a company established by another local authority and ELM. The council would not need a Gambling License and will approve the good cause applications via the ELM management system, allocate the funding to Good Causes and support the lottery with agreed press, PR and marketing to ensure continued support.

**c) ELM Product Usage**

This option provides Brent with a page within an ELM managed lottery product but no option for Good Causes. The council would need to apply for a Gambling Licence and be required to create and manage a website to be linked to the lottery product and take responsibility for all marketing. This option is recommended.

**3.12 Conclusion**

A comparison of three ELMs is detailed in Appendix 1 with screen shots shown in Appendix 2. Operating details of schemes have been reviewed and considered and it is recommended that Gatherwell Ltd. is appointed to run the Brent Community Lottery for the following reasons:

- (a) Gatherwell have run dedicated local authority online lotteries since November 2015 making them the most experienced in terms of local authority lotteries.
  - (b) Gatherwell currently run or are contracted to run local authority lotteries for 28 councils.
  - (c) Positive feedback was received from all launched local authority lotteries.
  - (d) All administration of the scheme including payments and prizes would be undertaken by Gatherwell requiring minimal administration by the council.
  - (e) Prizes are offered for matching 2 numbers as opposed to other providers who only provided prizes for matching 3 numbers.
  - (f) A Brent specific lottery online platform would be set up by Gatherwell whereas other providers did not offer this.
  - (g) A '*Brent Community Lottery*' transaction title would appear on all financial transactions whereas other providers do not offer this.
  - (h) The council set conditions for and approves the 'Good Causes' before they can create their own web page within the Brent Community Lottery platform.
  - (i) Payments to the council and Good Causes are on a monthly basis.
- The income received from the central fund is administered by the council whilst Good Causes would receive funding directly from the lottery provider.

**3.13 Overview of the Lottery**

The lottery as designed by Gatherwell, offers players the choice to support the central fund (managed by the council) or a specific good cause with each £1 ticket bought. Gatherwell seeks the commitment of the VCS to promote the lottery to their supporters whilst providing the opportunity to win up to £25,000. Community groups are each given their own page on the lottery online platform with bespoke marketing materials provided. There is no cost to groups. Groups apply to join online and once approved by council officers their page goes live

and they can start to promote and sell tickets. Proceeds apportionment for each ticket sold is set out in the table below:

	<b>Player chooses Specific Good Cause</b>		<b>Player chooses Central Fund</b>	
	% Allocation	£ Allocation per ticket	% Allocation	£ Allocation per ticket
<b>Prizes</b>	20	£0.20	20%	£0.20
<b>Specific Good Cause</b>	50	£0.50	-	-
<b>Council Central Fund</b>	10	£0.10	60	£0.60
<b>ELM – Administration</b>	17	£0.17	17	£0.17
<b>ELM – VAT</b>	3	£0.03	3	£0.03
<b>Totals</b>	100	£1.00	100	£1.00

### 3.14 How does it work?

- Tickets cost £1 per week
- All players must be aged 16 or over
- Players can buy multiple tickets for multiple causes
- Draws are conducted every Saturday at 8pm and results are posted online
- Players sign up via direct debit or payment card; payments are taken on a monthly plan or a 3, 6 or 12 month one off payment
- Winners are notified by email and receive the prize directly into nominated account or can donate the prize to a good cause
- Good Causes are paid their income on a monthly basis
- Good Causes and the council promote the lottery to their supporters
- The Central Fund is administrated by the council

### 3.15 Number Selection and Prize Structure is set out in the table below:

	<b>Winning Odds</b>	<b>£ Prize</b>
<b>6 Numbers</b>	<b>1:1,000,000</b>	<b>£25,000</b>
<b>5 Numbers</b>	<b>1:55,556</b>	<b>£2,000</b>
<b>4 Numbers</b>	<b>1:5,556</b>	<b>£250</b>
<b>3 Numbers</b>	<b>1:556</b>	<b>£25</b>
<b>2 Numbers</b>	<b>1:56</b>	<b>£3 free tickets</b>
<b>Overall odds of winning any prize</b>	<b>1:50</b>	

### Costs

#### 3.16 Gatherwell charge a one off set up fee which includes:

- Website design, hosting, maintenance and development.
- Payment gateway investments (dedicated Direct Debit and payment card accounts).
- Dedicated support telephone number, email & social media accounts.
- Marketing strategy support and generic design creation.
- Gambling License application support.
- Training for licence holders.

Councils are recommended to provide funds for launch marketing which could include: bolt on launch prizes, Good Cause launch event, PR & press events,

focused above the line marketing e.g. press, radio, refuse vehicle branding and social media campaign.

## Lottery Income

- 3.17 There are a number of variables involved in predicting the income that the Brent Community Lottery will achieve but what is known is that councils and Good Causes who spend time on marketing and promoting the lottery achieve a good level of supporters who buy tickets.
- 3.18 Brent Council will receive 10% (10p) of every ticket sold for a specific good cause and 60% (60p) of every ticket sold for the central fund. Good Causes will receive 50% (50p) of every ticket sold for their specific cause.
- 3.19 Data collected by Gatherwell suggests that for local authority lotteries (that they manage) between 0.5% and 1% of the population buy tickets. Taking Brent's population as 325,000 the following table outlines the possible income from a Brent Community Lottery:

Brent population – 325,000						
% of population who buy tickets (per week)	Number of tickets per year	Total Ticket sales per year	Total income (60% of ticket sales)	10% to central fund	Split of income (50%)	
					% of Central Fund Ticket Sales	% Specific Good Causes Ticket Sales
0.5% = 1,625	1,625 x 52 weeks	£84,500	£50,700	£5,070	30% £13,689	70%£31,941
					50%£22,815	50% £22,815
1% = 3,250	3,250 x 52 weeks	£169,000	£101,400	£10,140	30% £27,378	70%£63,882
					50%£45,630	50%£45,630

- 3.20 Total income from a Brent Lottery can therefore be assumed to be between £50,000 and £100,000 per year. Whereas income generated by ELM is assumed to be between £14,500 and £29,000 per year. In order for Brent to have no financial outlay yearly ticket sales of £30,042 need to be achieved if 100% of tickets are bought for good causes with yearly ticket sales of only £18,000 needed to be achieved if 70% of tickets are bought for good causes.

## Marketing

- 3.21 All councils with lotteries have highlighted that the key to a successful lottery is ongoing marketing. Gatherwell supports the Good Causes with all of the operational and administrative requirements in order to set up their individual lottery page and provide regular marketing support by a) generating bespoke marketing materials which they can print off, publish or amend to promote work b) get supporters and Good Causes to be proactive on social media, sharing and liking pages at key points. Brent will have two key marketing responsibilities a) promoting the lottery to drive tickets sales directly to the central fund and b)

promoting the lottery to Good Causes who will then join and drive participating and further promotion through their own page. A marketing budget has been

included in the budgets and a lottery marketing timetable will be developed with the Communications team with support from Gatherwell.

### **Delivery Timetable**

3.22 Gatherwell recommend a 24-week turnaround to take into consideration the timescales of being granted a Gambling Licence (18 weeks). It is not recommended to launch in a shorter timescale as time is needed for Good Causes to sign up, web platform development, launch timetable and communication plans to be developed and a suitable launch date event promoted.

### **Local Lottery Good Cause Criteria**

3.23 Your organisation must:

- Provide community activities or services within the London borough of Brent which support the ambitions and actions of the Borough Plan 2019-2023.
  - Have a formal constitution or set of rules.
  - Have a bank account requiring at least two unrelated signatories.
  - Operate with no undue restrictions on membership.
  - Have a detailed plan as to how the lottery will be promoted.
- And be either:
- A constituted group with a volunteer management committee, with a minimum of three unrelated members, that meets on a regular basis (at least three times a year)
  - A registered charity, with a board of trustees.
- Or:
- A registered Community Interest Company, and provide copies of your Community Interest Statement, details of the Asset Lock included in your Memorandum and Articles of Association, and a copy of your latest annual community interest report.

The council will not permit applications to join the lottery from:

- Groups promoting or lobbying for particular religious, political beliefs or campaigns.
- Organisations that do not work within the boundaries of the London Borough of Brent.
- Individuals.
- Organisations which aim to distribute a profit.
- Organisations with no established management committee/board of trustees (unless a CIC).

The council reserve the right to reject any application in line with the criteria above and to cease to licence any organisation with a minimum of seven days' notice for any reason. If fraudulent or illegal activity is suspected cessation would be immediate.



## **4.0 Financial Implications**

- 4.1 The set up costs of the Brent Community Lottery will be £7,311. These one off costs would be funded from within the overall Strategy and Partnerships budget. From year 2 onwards it is expected that the running costs will all be met from ticket sales. A proportion of each ticket sold contributes towards the prize fund and the ELM has insurance to cover the jackpot prize to ensure the council is not at risk. On current estimates it is expected that The Brent Community Lottery could generate income to the council of approximately £50,000 per annum.
- 4.2 Local authority lotteries promoted under licence from the Gambling Commission must retain accounting records for a minimum of three years from the date of any lottery to which they relate and they must be available for inspection by the Commission on request. These records must contain, in respect of each lottery, details of the total proceeds of each lottery, the expenses of the lottery and the number of sold and unsold tickets. Where the cumulative proceeds of lotteries promoted by a local authority exceed £1m in a calendar year, the Gambling Commission must be sent a written confirmation from a qualifying auditor that the proceeds of these lotteries must be provided within ten months of the period to which the accounts relate.
- 4.3 A local authority that is licensed by the Gambling Commission to promote a lottery must submit a return for each lottery which shows the total proceeds and how they have been distributed between prizes and expenses and the amount applied directly to the purpose for which the local authority has power to incur expenditure. Guidance from the Gambling Commission sets out what the local authority's return must contain. A local authority's return to the Gambling Commission must be made within three months of the last date on which tickets in the lottery were on sale. When a return is submitted to the Commission, it must be verified by a Personal Management Holder.

### **Risk Management Implications**

- 4.4 The biggest risk associated with setting up a local lottery is the perception that the council is promoting gambling. However, a community lottery is a well-recognised model operating in over 50 local authority areas and is more akin to a raffle than a lottery, the experience of other community lotteries being that it appeals more to those who want to donate rather than gamble as 60p in every pound goes to Good Causes. There are various actions however, that can be taken to mitigate against any unhealthy gambling behaviour:
- It will be marketed with the promotion of Good Causes as its focus - appealing more to people who are motivated to donate rather than gamble.
  - It is delivered remotely and requires people to go through the process of setting up an online account.
  - There is no instant gratification element.
  - The top prize is capped at £25,000 and there are no roll overs, so the prizes are not life changing amounts.
  - You can limit the number of tickets that people can buy (the average purchase from lotteries in existence is 1.8 tickets).

- We provide the ability for players to self-exclude, and have the ability to place blocks or caps on players.
- Because the lottery is run online any unhealthy patterns will be spotted.

As part of the Gambling Commission license application the council will need to produce a safeguarding policy to protect vulnerable people.

## **5.0 Legal Implications**

- 5.1 It will be necessary for the council to make an application to the Gambling Commission and obtain a Local Authority Lottery Licence. Part 11 of the Gambling Act 2005 sets out the law regarding lotteries that are promoted by local authorities. The Operating Licence will be subject to conditions laid down by the Gambling Commission. The council must have regard to the Conditions and Codes of Practice which are published by the Commission. Some of the guidance provided by the Gambling Commission dated September 2014 is set out in this report.
- 5.2 The Gambling Act 2005 allows councils to employ an external lottery manager (ELM) to run all or part of their lottery. An ELM is defined in section 257 of the Gambling Act 2005 as a person or company who makes arrangements for a lottery on behalf of a local authority but is not a member, officer or employee of that authority. ELMs are required to be registered with the Gambling Commission. In practice, a local authority will be required by the Gambling Commission to have at least one personal management licence holder as a local authority will not be considered to be a small scale operator. Considerations include that if the officers move employment a new licence must be applied for within 5 days. Officers will need to meet the criteria and give personal details for checks to be carried out. The licence from the Gambling Commission may stipulate the minimum number of persons who should obtain a personal management licence.
- 5.3 The guidance from the Gambling Commission of September 2014 states that in deciding who should hold the personal management licence on behalf of the local authority, it should identify the relevant senior individual who can take overall management responsibility for the promotion and proper management of the lottery and for compliance with the regulatory regime as a whole. The guidance also states that a personal management licence holder must be someone in a senior management post who holds the relevant delegated authority from the licensing local authority. Officers recommend that the Head of Strategy & Partnerships and the Assistant Chief Executive are personal management licence holders for the purpose of promoting this new proposed lottery.
- 5.4 Officers are proposing to engage an external lottery manager (ELM) to run all of Brent's lottery. The appointment of an ELM will need to be formalised by entering into a public concession contract. Officers estimate that the maximum value of this concession contract will be £145k for the five years plus a one-off set up fee of £3,000. Consequently, this contract will be outside the Concessions Contracts Regulations 2016 (EU Regulations) which sets a threshold for services concession contracts of £4,104,394 and also specifically excludes lottery services under Regulation 10(13). The proposed contract falls within the definition of a Low Value Contract in accordance with Standing Order 82. No formal tendering procedures apply to Low Value Contracts except that

at least three written quotes must be sought and the quotes sought shall be recorded (Standing Order 86(b)).

- 5.5 Officers in this report show a comparison of the three ELMs considered for this contract and are recommending to award the contract to Gatherwell Ltd. Whilst there has been a comparison of three ELMs, three written quotes have not formally been sought in accordance with Standing Order 86(b) and hence it is recommended to waive this requirement to enable a direct award to Gatherwell Ltd. The remaining legal implications, including guidance from the Gambling Commission of September 2014, are set out in the body of this report.

## **6.0 Equality Implications**

- 6.1 Brent is committed to equality, diversity and inclusion; the council is determined to be an exemplar of good practice in equality, diversity and human rights and it is our policy to treat everyone fairly and with respect. We aim to ensure that all our current and future residents, staff and stakeholders are treated fairly and receive appropriate, accessible services, and fair and equal opportunities.
- 6.2 This commitment requires that equality considerations play a key role in our decision-making processes and that our policies are fully compliant with the duties placed on us as a public sector body by the Equality Act 2010. Equality Analyses (EAs) ensure that we follow through on our commitment to equality and they provide a method for clearly demonstrating the necessary legal compliance.
- 6.3 The Equality Act 2010 replaced the pre-existing anti-discrimination laws with a single Act. The legislation covers the exercise of public functions, employment and work, goods and services, premises, associations, transport and education. The act prohibits victimisation and harassment, and all of the following forms of discrimination: direct; indirect; by association; by perception; or discrimination arising from disability. The detail regarding the Public Sector Equality Duty pursuant to section 149 of the Equality Act 2010 is set out in paragraph 5.3 above.
- 6.4 The impact of the changes on people with protected characteristics will be monitored on a regular basis and where any unintended negative consequences are identified, the council will implement remedial actions. An equality analysis has been carried out and further analyses will be undertaken if the recommendations in this report are adopted.

## **7.0 Consultation with Ward Members and Stakeholders**

- 7.1 The Lead Member has been involved during the process.

## **8.0 Human Resources/Property Implications (if appropriate)**

- 8.1 The strategy does not have human resources/property implications.

**Report sign off:**

**PETER GADSDON**  
Assistant Chief Executive

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**Appendix 1**  
**Comparison between three External Lottery Managers providers**

	<b>Gatherwell</b>	<b>Hive</b>	<b>Sterling</b>
<b>Local Authority Lottery Provider</b>	Yes - ELM	Yes – ELM in partnership with Tonbridge and Malling Borough Council	Yes – ELM
<b>Local Authority Lottery Contracts</b>	1 <sup>st</sup> launched November 2015 12 launched 14 contracted and will launch during 2017/18	1 <sup>st</sup> launched in September 2016 No additional contracts	2 contracted through its Unity Lottery Platform but does not provide marketing support
<b>Ticket Costs</b>	£1 per ticket	£1 per ticket	£1 per ticket
<b>Ticket Numbers Choice</b>	Yes	No – allocated	No - allocated
<b>Draws</b>	8pm Saturdays, results posted online	5.45pm Saturdays, results posted online	Weekly draws
<b>Prizes</b>	£25,000 – 6 numbers, £2,000 – 5 numbers, £250 – 4 numbers, £25 – 3 numbers and £3 free tickets for 2 numbers	£25,000 – 6 numbers, £1,000 – 5 numbers, £100 – 4 numbers, £10 – 3 numbers  Super Draw each month. 6 numbers to win £25,000 for player and £25,000 for good cause.	£25,000 – 6 numbers, £1,000 – 5 numbers, £25 – 4 numbers and £5 free tickets for 3 numbers.
<b>Odds</b>	1 in 50	N/A	1 in 63
<b>Ticket sales</b>	All online – players sign up via direct debit or payment card; payments are taken on a monthly plan or a 3, 6 or 12 month one off payment	All online – players sign up via payment card; players can buy minimum 1 ticket.	Direct debit or card payments online or by phone. Payments are taken on a monthly, 3, 6 or 12 month plan.
	Players can buy multiple tickets for multiple causes	Players can buy multiple tickets for multiple good causes	Players can buy multiple tickets but the lottery is not linked to local

			good causes so would just be for a central fund
<b>Payments</b>	Winners are notified by email and can choose to receive prize directly to account, donate prize their chosen good cause or buy more tickets	Winners are notified by preferred choice of contact. Prize is paid directly to account.	Prizes paid weekly by cheque
	Good causes and central fund are paid their income on a <u>monthly</u> basis	Good causes and central fund are paid their income on a <u>quarterly</u> basis	Payments made to the council who would need to administer grant payments to organisations
	Notification states <u>Brent Lottery</u> on all finance transactions with players, council and good causes	Notification states <u>Zaffo</u> on all finance transactions with players, council and good causes	Notification states Sterling Lotteries on all finance transactions with players and council
<b>Prize fund</b>	<u>20%</u> of ticket sales to prizes	<u>15%</u> of tickets sales to prizes	<u>18.2%</u> of ticket sales to prizes
	50% of ticket sales to good causes + 10% to central fund or <u>60%</u> of ticket sales to central fund	50% of ticket sales to good causes + 10.5% to central fund or <u>60.5%</u> of ticket sales to central fund	50% of ticket sales to council who would administer the payments to community groups (sliding scale 60% if over 3,000 players)
<b>Online Platform</b>	Set up a customized Brent Lottery online platform (e.g. <a href="http://www.brentlottery.co.uk">www.brentlottery.co.uk</a> )	No customized Brent Lottery website - becomes part of the Hive lottery website (e.g. <a href="http://www.hivelotto.co.uk/brentcouncil">www.hivelotto.co.uk/brentcouncil</a> )	No customized Brent Lottery website – becomes part of one of Sterling’s on line platform and no links for local causes (e.g. <a href="http://www.unitylottery.co.uk/charity/display/Brent">http://www.unitylottery.co.uk/charity/display/Brent</a> ) Local authorities are advised to set up their own lottery website.
<b>Good Causes</b>	Provide good causes with their own customized page	Provide good causes with their own customized page and	N/A

	and support to set up within the Brent Lottery online platform	support to set up within Hive lottery website. Brent good causes will appear alongside all other Hive good causes and not within a specific Brent area	
	Marketing materials provided by ELM to Good Causes	Marketing materials provided by ELM to Good Causes	N/A
	Supporters can choose a Good Cause or Brent Central Fund	Supporters can choose a good cause or Brent central fund amongst all users of Hive – not Brent specific	Supporters would not be able to choose a good cause. Can only choose the council fund
	<u>Search</u> option available for finding a good cause.	<u>No search</u> option available for finding a good cause.	N/A
<b>Model</b>	Council obtain a gambling licence for a local authority remote lottery. Gatherwell act as ELM and manage all aspects of lottery included web platforms.	Hive is run by Tonbridge and Malling Borough Council who hold the gambling licence and Capen who are the ELM. Brent council would become a good cause within the Hive online platform.	Council obtain a gambling licence for a local authority remote lottery. Sterling act as ELM through Unity product but do not manage or set up a localized Web platforms.
<b>Costs</b>	<p>Gatherwell one off set up costs of £3,000 + VAT</p> <p>Gambling Commission Licence – £692 per year + application fee £244</p> <p>Lotteries Council Gold Membership – £350 per year + application fee £25</p>	<p>Hive one off set up costs of £3,000 + VAT</p> <p>HIVE annual fee - £300</p> <p>Launch / Marketing investment - £4,000 per year (this is based on not having a Brent specific online platform so would have to do more marketing to ensure Brent good causes could be easily found)</p>	<p>Sterling one off set up fee of £199.</p> <p>Gambling Commission Licence – £692 per year + application fee £244</p> <p>Lotteries Council Gold Membership – £350 per year + application fee £25</p> <p>Launch / Marketing investment - £10,000 per year (this is based on</p>

	Launch / marketing investment –£3,000 launch & £2,000 per year		not having any good causes on the online platform so direct marketing to VSC supporters would be needed)
	Annual Fees – would all be covered by the lottery income	Annual Fees – would all be covered by the lottery income	Annual Fees – would all be covered by the lottery income
<b>Annual Income</b>	Vale – £76,000 (£127,400 ticket sales) split 33% central fund - £25,080 and 66% good causes - £50,160 Portsmouth – on track for £72,540 (£120,900 ticket sales) split 50% central fund - £36,270 and 50% good causes - £39,270	Data not available	Data not available



## Appendix 2

### Screen Shots from External Lottery Managers

#### Gatherwell Ltd

Front Page - [www.valelottery.co.uk](http://www.valelottery.co.uk)

The screenshot shows the Vale Lottery website. At the top, there's a green header with the 'VALE LOTTERY' logo and navigation links: 'Buy tickets', 'Are you a good cause?', 'Log in', and 'MENU'. The main banner features a cricket player in a blue cap and white shirt, with the text 'Welcome to Vale Lottery'. Below this, three key points are listed: 'Win up to £25,000!', 'Support local causes in Aylesbury Vale', and 'Only £1 per week!'. A 'Support The Vale' button is present. A prominent blue section advertises a 'WIN a £500 bike voucher' with an image of a person on a bike. Below this, a 'Latest Draw' section shows the date 'Sat 5 August 2017' and the winning numbers '0 5 8 7 6 1'. A 'How it works' section follows, with three steps: 1. 'Choose your 6 numbers' (illustrated with a wheel of numbers), 2. 'Win up to £25,000!' (illustrated with a person holding a large number 6), and 3. 'See your community shine' (illustrated with a house and a sun). A 'Join Now' button is at the bottom of this section. The footer includes a 'Can we help?' link and a phone number '01296 82 12 12'.

Front page – [www.portsmouthlottery.co.uk](http://www.portsmouthlottery.co.uk)

The screenshot shows the Portsmouth Lottery website. The header is blue with the 'Portsmouth lottery' logo and navigation links: 'Buy tickets', 'Are you a good cause?', 'Log in', and 'MENU'. The main banner features a coastal scene with the text 'SUPPORT LOCAL CAUSES!'. Below this, three key points are listed: 'Win up to £25,000!', '80% goes to good causes and prizes!', and 'Only £1 per week!'. A 'Latest Draw' section shows the date 'Sat 5 August 2017' and the winning numbers '0 5 8 7 6 1'. A 'How it works' section follows, with three steps: 1. 'CHOOSE YOUR SIX NUMBERS' (illustrated with a smiley face), 2. 'WIN UP TO £25,000' (illustrated with a smiley face), and 3. 'SEE YOUR COMMUNITY SHINE' (illustrated with a smiley face). A 'Join Now' button is at the bottom of this section. The footer includes a 'Can we help?' link, a phone number '023 9319 0888', an email address 'support@portsmouthlottery.co.uk', and social media links for Facebook and Twitter. The browser's address bar shows 'https://www.portsmouthlottery.co.uk/' and the system clock shows '11/08/2017'.


[Buy tickets](#)
[Are you a good cause?](#)
[Login](#)
[MENU](#)



**Help local good causes**

📅 Next Vale Lottery draw on Sat 12 August at 8:00PM!

🕒 The draw is in 1 day 6 hours 57 minutes!

[Support A Specific Cause »](#)

**Raising £16,354.00 a year**

🎟 625 tickets of 750 ticket goal

[Buy Tickets](#)

- OR -

[Support Specific Cause](#)

**WIN a £500 bike voucher**



[Click for more info...](#)

**About Vale Lottery Community Fund:**

Vale Lottery is a weekly lottery that directly supports good causes which benefit the Aylesbury Vale community.

Lotteries are a fun and effective way for causes to raise much needed funds in these difficult times. By getting more people on board, they don't just raise funds, they also raise awareness.

When you play the Vale Lottery you know that 60% of your ticket price goes to good causes (more than DOUBLE what the National Lottery gives) AND the money raised is going to good causes that benefit your local community.

Proceeds generated from this page go into a general good cause fund, administered by Aylesbury Vale District Council, which will be spent on providing vital support to a wide range of local organisations.

You can see the organisations currently receiving support here:

[www.aylesburyvaledc.gov.uk/voluntary-sector-funding-agreements](http://www.aylesburyvaledc.gov.uk/voluntary-sector-funding-agreements)

If you would rather support a specific good cause then you can [search for a good cause here](#).

[Buy Tickets](#)

- OR -

[Support Specific Cause](#)

**Recent Supporters:**

Mr B supported Vale Lottery Community Fund with 1 ticket  
3 hours ago

Mr M supported Buckland and Aston Clinton Cricket Club with 2 tickets  
2 days ago

Mr S supported Buckland and Aston Clinton Cricket Club with 2 tickets  
3 days ago

Mr S supported Buckland and Aston Clinton Cricket Club with 1 ticket  
4 days ago

Miss M supported Chiltern Cats Protection

Portsmouth  
lottery

Buy tickets


Are you a  
good cause?


Log in

≡ MENU

Portsmouth  
lottery

Guildhall Square, Portsmouth

 Next Portsmouth Lottery draw on Sat 12 August at 8:00PM!

 The draw is in 1 day 7 hours 0 minute!

Support A Specific Cause »

About Portsmouth Lottery Community Fund:

Portsmouth Lottery is a weekly lottery that directly supports good causes which benefit the Portsmouth community.

Lotteries are a fun and effective way for causes to raise much-needed funds in these difficult times. By getting more people on board, they don't just raise funds, they also raise awareness.

When you play the Portsmouth Lottery you know that 60% of your ticket price goes to good causes (more than DOUBLE what the National Lottery gives) AND the money raised is going to good causes that benefit your local community.

Proceeds generated from this page go into a general good cause fund, administered by Portsmouth City Council, which will be spent on providing vital support to a wide range of local organisations.

You can see the organisations currently receiving support here:

[www.portsmouth.gov.uk/home.aspx](http://www.portsmouth.gov.uk/home.aspx)

If you would rather support a specific good cause then you can [search for a good cause here](#).

BUY TICKETS

SUPPORT SPECIFIC CAUSE

Raising £27,820.00 a year

1070 tickets of 2000 ticket goal

BUY TICKETS

SUPPORT SPECIFIC CAUSE

Recent Supporters:

Miss J supported Portsmouth Lottery with 1 ticket  
1 hours ago


Miss J supported Portsmouth Lottery with 1 ticket  
1 hours ago









Miss J supported Portsmouth Lottery with 1 ticket  
1 hours ago


Mr R supported Portsmouth Lottery with 5 tickets  
18 hours ago

Mr B supported Portsmouth Lottery with 1 ticket  
20 hours ago

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 **Browse Causes**

 <p><b>Vale Lottery Community Fund</b> Help local good causes Vale Lottery Community Fund supports good causes which benefit the local community.</p> <a href="#">View</a>	 <p><b>Winslow United Football Club</b> Elmfield Gate, Winslow Winslow United Football Club provides a much loved and valued community centre.</p> <a href="#">View</a>	 <p><b>East Claydon School</b> Support our school! For the last 107 years East Claydon School has been at the heart of our beautiful rural community. But over the next two years East Claydon will...</p> <a href="#">View</a>	 <p><b>FoTJS - Friends of Turnfurlong Junior School</b> Support Our Cause! FoTJS (Friends of Turnfurlong Junior School)</p> <a href="#">View</a>
 <p><b>Broughton Infant School PTA</b> Support Our Cause! Broughton Infant School PTA provides valued support for services and resources within the school.</p> <a href="#">View</a>	 <p><b>Carers Bucks</b> Support Carers! Carers Bucks is an independent charity which supports the wellbeing of unpaid family carers living in Buckinghamshire.</p> <a href="#">View</a>	 <p><b>Bucks Play Association</b> Aylesbury Bucks Play Association is a charity committed to promoting, supporting and developing play provision in Bucks.</p> <a href="#">View</a>	 <p><b>Buckingham Athletic Sports &amp; Social Club</b> Stratford Road, Buckingham Buckingham Athletic Sports &amp; Social Club is a charity which provides facilities for all ages and abilities to enjoy sport and social activities.</p> <a href="#">View</a>



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## Hartwell Riding for the Disabled Group

# Hartwell Riding for the Disabled Group

### Support Our Cause!

 Next Vale Lottery draw on Sat 12 August at 8:00PM!


 The draw is in 1 day 8 hours 12 minutes!

[More Good Causes »](#)

Raising £182.00 a year

7 tickets of 50 ticket goal

[Buy Tickets](#)



[Click for more info...](#)

#### About Us:

Hartwell Riding for the Disabled Group provides therapeutic exercise for disabled children and adults from the Aylesbury area. Riding improves co-ordination, communication, confidence, social skills and physical wellbeing. Despite being entirely run by volunteers, our expenses have increased which is why we need your help.

Thank you for your support and good luck!

Yours Sincerely,

*Felicity Smettem*

*Chair and Senior Coach*

[Buy Tickets](#)

#### Recent Supporters:


Mr B supported Vale Lottery Community Fund with 1 ticket  
2 hours ago

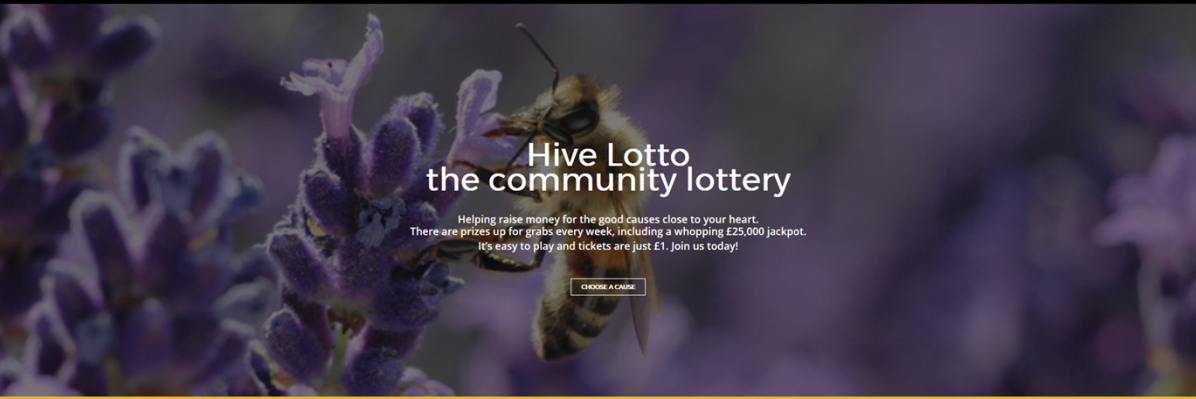
Mr M supported Buckland and Aston Clinton Cricket Club with 2 tickets  
2 days ago

Mr S supported Buckland and Aston Clinton Cricket Club with 2 tickets  
2 days ago

# Hive Lotto (Tonbridge and Malling Borough Council and Capen Ltd.)

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## Hive Lotto the community lottery

Helping raise money for the good causes close to your heart.  
There are prizes up for grabs every week, including a whopping £25,000 jackpot.  
It's easy to play and tickets are just £1. Join us today!

[CHOOSE A CAUSE](#)


Play in July and you'll get into a special bonus draw to win a £50 shopping voucher!

[PLAY NOW](#)




**CHOOSE A CAUSE**

Play for a cause and they'll get 50p from every £1 ticket. A further 10p will be spent on local good causes.




**IF YOU WIN, THEY DO TOO**

If you win our monthly £25,000 Second Chance Super Draw, the cause you played for will get £25,000 too!




**THE HIVE COMMUNITY**

Play through our Hive Community and 50p from every £1 ticket you play will be spent on local good causes.




**#HIVELOTTO**

We love your ideas and shares, help us spread the word about our community, which is your community!




### OUR MEMBERS



**THE FOX PROJECT**

We have been rescuing sick and injured foxes for over 25 years and rehabilitating them back to the wild. Our wildlife ambulance is on the road every day of the year dealing with casualties and we also provide advice to those concerned about fox behaviour.


[BUY TICKETS](#)



**WEST KENT MIND**

Our goal is to ensure anyone facing a mental health problem has somewhere to turn for support and advice. 1 in 4 people will experience a mental health problem this year. Hive Lotto will enable us to help more people in our local community.

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**COMPAID**


Compaid supports hundreds of disabled people in and around Tonbridge every day. Every pound raised by Hivo Lotto goes to support disabled people in your community.

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HOME FEATURED CAUSES SEE ALL OF OUR CAUSES JOIN US WINNING NUMBERS



**YOU COULD WIN UP TO £25,000!**

### HIVE COMMUNITY

Hive Lotto is a fun, feel-good way to support the causes close to your heart. Choose a cause, or play here to support good causes across Tonbridge & Malling - 68p from every ticket you buy is spread across the local causes we support.

Playing Hive Lotto helps us support our community

**BUY TICKETS NOW**

### PRIZES

**Match 6 numbers** and win £25,000  
**Match 5 numbers** and win £1,000  
**Match 4 numbers** and win £100  
**Match 3 numbers** and win £10  
**PLUS** every month there's a **second chance to win £25,000** (and if you win then the good cause you played for gets £25,000 too!)

Every month you will also be entered into a bonus draw to win a UK short break for two, plus, **if you play in June, you'll go into a draw to win a £50 shopping voucher!**



**YOU COULD WIN UP TO £25,000!**

### FRIENDS OF LUNSFORD PRIMARY SCHOOL

Friends of Lunsford School (FOLS) is a group of individuals who give their time to do what they can to raise additional funds for the children of Lunsford Primary School in Larkfield.

They arrange fundraising activities through the year including things like a Summer Fair, film & disco nights for the children and quiz nights for the adults.

Playing Hive Lotto helps us support our community

**BUY TICKETS NOW**


### PRIZES

**Match 6 numbers** and win £25,000  
**Match 5 numbers** and win £1,000  
**Match 4 numbers** and win £100  
**Match 3 numbers** and win £10  
**PLUS** every month there's a **second chance to win £25,000** (and if you win then the good cause you played for gets £25,000 too!)

Every month you will also be entered into a bonus draw to win a UK short break for two, plus, **if you play in June, you'll go into a draw to win a £50 shopping voucher!**

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 <b>Brent</b>	<b>Cabinet</b> 17 June 2019
	<b>Report from the Assistant Chief Executive</b>
<b>Performance Report, Q4 (Jan–Mar) 2018/19</b>	

<b>Wards Affected:</b>	All
<b>Key or Non-Key Decision:</b>	Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>No. of Appendices:</b>	One: <ul style="list-style-type: none"> <li>Appendix A – Corporate Performance Scorecard</li> </ul>
<b>Background Papers:</b>	N/A
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	Peter Gadsdon, Assistant Chief Executive Irene Bremang, Head of Performance & Improvement

## 1.0 Purpose of the Report

- 1.1 This report and the performance scorecard (**Appendix A**) set out the position on the Council's performance in the fourth quarter of 2018/19.
- 1.2 The content and format of the report and scorecard is focussed on the five themed Brent 2020 priorities; Employment and Skills, Regeneration; Business and Housing Growth; Demand Management; Raising Income and then on the Borough Plan priorities. This report will also present 2018/19 measures under the themes agreed in the new Borough Plan earlier this year. This provides Cabinet with a 'closure report' and corporate overview of Council performance under the old Borough Plan 2015 – 2019.
- 1.3 This report and scorecard also summarises Council performance indicatively under the new Borough Plan priorities for 2019-2023. (Building a Better Brent). It is an indicative summary at this point in time as a new suite of measures for quarterly performance reporting for 2019/20 is being finalised as part of the annual service planning process.

- 1.4 The Corporate Performance Scorecard (Appendix A) sets out the suite of key performance indicators (KPIs) being monitored corporately. Commentary is mandatory in line with the current performance framework and is included in the scorecard. This applies to all measures which have a Green, Amber or Red RAG status.

## **2.0 Recommendation(s)**

- 2.1 Cabinet has been asked to:

- a. Note the performance information contained in this report.
- b. Consider the current and future strategic risks associated with the information provided and agree remedial actions on strategic risks as appropriate.
- c. Challenge progress with responsible officers as necessary.

## **3.0 Detail**

- 3.1 Overall there are currently 103 key indicators in the Q4 performance scorecard. The format of the scorecard provides a distinct and primary focus on Brent 2020 priorities and outcomes.
- The first part of the scorecard sets out 30 key indicators linked to the Brent 2020 themed priorities.
  - The second part of the scorecard lists 73 key indicators linked to the Borough Plan priorities and the Council's 'Corporate Health' in a tabular format.
- 3.2 Out of the 30 Brent 2020 priority indicators: 21 are on or above target (Green status), with a further four just off target (Amber status), leaving only four significantly off target (Red status). One measure is contextual and therefore does not have a RAG rating.
- 3.3 There are 73 Borough Plan and Corporate Health indicators in the Q4 scorecard, of which 55 indicators have a RAG status. 21 are on or above target (Green status), 17 are just off target (Amber status), and 18 are significantly off target (Red status). A further 13 indicators are for contextual use and four measures are awaiting the publication of Q4 data. This will be updated in the next report.
- 3.4 A summary of performance under the Brent 2020 priorities and Borough plan priorities is set out below.

## **Brent 2020 Priorities**

### **Employment and Skills**

- 3.5 This priority has shown strong performance as all four measures have a Green RAG rating having exceeded their year to date targets. Brent Works job outcomes (Actual YTD – 115, Target – 100); Apprenticeship outcomes (Actual YTD – 56, Target – 50); Brent Start achievement rates (Actual YTD – 96%, Target – 95%) and percentage rate of NEETs (16 to 18 year olds who are not in education, employment or training) (Actual YTD – 1.4%, Target YTD – 2%) all continue to perform well.
- 3.6 The Living Room employment outcomes (Actual YTD – 131, Target – 45) has also continued to perform robustly. As well as high employment outcomes the team have also achieved a sustainment rate of over 70% of clients staying in work for 26 weeks.
- 3.7 The percentage of care leavers in education, employment or training (EET) has improved from Amber (46%) to Green (55%) this quarter. This improvement is attributable to increased working with partner agencies.

### **Regeneration – economic, social and environmental conditions**

- 3.8 The timeliness of both major and minor planning application decisions continue to be above target. A focus on committee scheduling and using agreed extensions of time have ensured a continued improvement of performance over the past seven quarters. (Actual YTD – 96.7%; Target YTD – 82% and Actual YTD – 89.5%; Target YTD – 76% respectively). Government thresholds are 60% and 70% respectively meaning Brent is performing significantly above these levels.
- 3.9 Reports of illegally dumped waste incidents remain high (Actual YTD – 26,717 incidents). Q4 has had the highest number of illegal dumping incidents reported to the Council this year to date with 7,142 reported for the period. The rise of reported incidents has been attributed to greater resident awareness and the ease of reporting incidents using mobile apps. The average time taken to remove illegally dumped waste is less than one day with an actual of 0.47 days for 2018/19 (Green RAG status). Performance has continually improved over the year and Q4 has shown the strongest performance with an average clearance time of 0.43 days.
- 3.10 The reoffending rates by young offenders has improved from Red to Amber rated, decreasing from 54% in Q3 to 50% in Q4 (Actual YTD – 50%, Target YTD – 48.1%). Data has been sourced from the most recent Youth Data Summary published by the Ministry of Justice in Quarter 4 of 2018/19. The rate of reoffending fluctuates due to the relatively small size of the cohort (70 young people). Brent YOS is using Youth Justice Board (YJB) developed tools to

reduce reoffending through an increasingly sophisticated understanding of offending behaviour and trends.

### **Business and Housing Growth**

- 3.11 The number of empty properties refurbished and brought back into use is significantly above its target (Actual YTD – 119, Target YTD – 50).

### **Demand Management**

- 3.12 There has been mixed performance against the suite of Housing Needs indicators that signify demand for housing. Number of Households in temporary accommodation (Actual YTD – 2,191, Target 2,775) and homelessness prevented and relieved (Actual YTD – 57%, Target 50%) both have a Green RAG status. The number of households in temporary accommodation has declined by nearly 200 since Q3 (2,384). The percentage of homelessness prevented and relieved has improved from Red in Q3 partly due to changes in the methodology which have increased the accuracy. Performance for this indicator has increased significantly over the year since Q1 (47%), and this represents 931 families helped to stay in their current accommodation or find a suitable alternative.
- 3.13 Households in non-self-contained B&B (Actual YTD – 121, Target – 30) is currently Red status. Post Homelessness Reduction Act applications now go through a longer processing route before a decision is taken. This has a knock-on effect of higher numbers in B&B, pending the outcome of the relief duty stage of their application.
- 3.14 Percentage of households to whom the Council owes a main housing duty (previously reported as a number) is now Amber status, having declined from Green in the previous quarter (Actual YTD – 59% Target – 50%). For the first time in recent memory, the Council accepted the main housing duty to fewer households than the number of social housing lets in the year.
- 3.15 All four Adult Social Care indicators are Green, having maintained or improved their performance from the previous quarter. For 2018/19 there have been eight new admissions to residential care homes for people aged 18-64 and 84 admissions for those aged 65+, against targets of 14 and 111 respectively. Demand for placement in both age categories continue to increase and sign off is required by a Service Manager to ensure placements are only made when necessary. Performance for the Reablement service has declined from Q3 (Q3 – 87.4%, Q4 – 82.5%), but the Actual YTD of 76.6% exceeds the 75% target.
- 3.16 The average monthly acute delayed transfers of care (DToC) attributable to ASC has improved significantly in Q4 (Actual YTD – 3.60, Target – 6.50). This is attributable to improvements made between Q2 and Q4 in reducing delays, and the introduction of Homefirst and seven day working.

- 3.17 The average days taken to place a child with their adoptive family has increased both in the last quarter and since the equivalent period last year. It does however outperform the target (Actual YTD – 387, Target 426), surpassing the national average of 486 and statistical neighbour average of 552.
- 3.18 The percentage of LAC placed with foster carers remain below its target (Actual YTD – 64%, Target – 70%). The number has decreased from Q2 due to the high number of older LAC who are placed in semi-independent accommodation.

### **Raising Income**

- 3.19 Collection of non-domestic business rates is rated Green (Actual YTD – 99.02%, Target – 98.74%), exceeding 99% for the first time ever.
- 3.20 The Registration and Nationality service income (Actual YTD – £1.1m, Target YTD – £940k) has returned to a Green RAG status after scoring Red in Q3. At the end of Q3, The Nationality Document Return Service and The Nationality Document Checking Service were due to be withdrawn from Local Authority control; however, the provider setting up the front end service for the Home Office was unable to deliver to schedule and we were able to generate an additional three months of income.
- 3.21 Performance is just below target for percentage of council tax collected and income generated by building control and both have an Amber RAG rating (Council Tax Actual YTD – 96.08%, Target – 96.50%, Building Control Actual YTD – £1.38m, Target – £1.41m). The council tax collection target is an aspirational one and 96.08% represents the best collection rate ever achieved, and it is anticipated that performance will continue to improve when the service returns to in-house delivery this year. The small underspend in building control is primarily due to staff vacancies.
- 3.22 The value of CT/HB overpayments recovered (Actual YTD – £9.63m, Target – £10.75m) is rated Red, falling from Amber in Q3. There have been delays due to the implementation of new in-house enforcement systems and procuring an external litigator, and Universal Credit means an increased number of claimants whose ability to make repayments has been reduced. The Enforcement Manager and system developers are assisting with implementation of system and overcome issues delaying in-house enforcement instigation.

### **Better Lives**

- 3.23 The percentage of Brent pupils attending a good or outstanding school has gone down from 95% in Q3 to 93% in Q4 and receives a Red rating. Five inspection reports were published in Q4 and while four schools were judged Good, Lyon Park Primary School was rated as Requires Improvement.

- 3.24 Of the 11 indicators for Children's Social Care, seven have a Green RAG Rating. Some of the strongest performers are:
- The rate of children & family assessments per 10,000 children (Actual YTD – 501.9, Target – 650), a significant reduction compared to the last year because of increased screening activity by Brent Family Front Door
  - The number of children subject to a child protection plan per 10,000 children (Actual YTD – 38.4, Target – 43)
- 3.25 Four of the indicators are rated Amber:
- Percentage of social workers on a permanent contract (Actual YTD – 74%, Target – 75%).
  - LAC school attendance (Actual YTD – 86.8%, Target – 90%) is in line with the previous year and guidance has been issued to schools and carers to promote attendance
  - Stability of LAC (Actual YTD – 13%, Target – 11%) is an improvement on last year even though it has not been able to meet its target
  - EHCPs maintained (Actual YTD – 2,173, Target – 2,240)
- 3.26 The number of adults using services who receive a direct payment into the community has an Amber rating as it is slightly below target (Actual TYTD – 23.3%, Target – 24%), but it is anticipated this will continue to improve over time now that the management of direct payments has been brought back in house.
- 3.27 The percentage of residents who have completed a health check is 50%, against a target of 45% and receives a Green rating. The GP contract has been revised to improve targeting of invitations. Performance for the other four indicators is incomplete as data has not yet been made available by Public Health England, but the Brent Public Health team have confirmed they are all likely to meet or exceed target.

### **Better Place**

- 3.28 The percentage of Category 1 defects repaired in time (emergency call-outs and 24hr response time defects) is performing well – although it received a RAG rating of Amber, 100% of repairs were completed in time in Q3 & Q4 and the failure to hit the target was due to underperformance at the start of the year that has since been addressed. Repairs time for Category2 defects is Red (Actual YTD – 51%, Target – 98%), with Q4 reaching a low point for the year of 28%. This is partly driven by a backlog of historical defects which hadn't been logged as completed. The contractor updated their system in early April and brought in extra resources to deal with the backlog, and we engaged two additional contractors to repair newly reported defects. Monitoring of the LoHAC contractor continues to check that the work remains on track.
- 3.29 Although waste disposal tonnage has decreased continually throughout the year it is rated Amber as it did not meet its target (Actual YTD – 67,357, Target

– 65,985). This is lower than 2017/18 despite 2% property growth. The Council is working with contractors Veolia and West London Waste Authority to develop new strategies to continue this direction of travel.

- 3.30 The amount of residual waste collected per household and the percentage of recyclables sent for re-use, recycling and composting both have a Red RAG status, performing very similarly to last year (Residual Waste Actual YTD – 476, Target – 360; Recyclables Actual YTD – 38%, Target – 45%). Although Veolia does not have a target to increase recycling they are contractually bound to reduce residual waste, and they are continuing to promote recycling services and supported the rollout of the food waste diversion project.
- 3.31 Car parking revenue has exceeded target and is RAG Green (YTD Actual – £385k, Target £533k) due to increased use of the facilities.
- 3.32 The number of Private Rented Sector dwellings improved (YTD Actual – 1,167, Target – 1,000) and the number of selectively licensed properties (YTD Actual – 8,124, Target 6,000) both have a RAG rating of Green. Selective licensing was introduced into five new wards for 2018/19 and 100% coverage would equate to around 8,500 properties, so the current level of achievement is very good.
- 3.33 Four of the housing KPIs are Amber, including:
- Percentage of customers satisfied with the repairs service (Actual YTD – 80%, Target – 82%), an improvement from Red in Q3
  - Properties with a valid gas safety certificated (Actual YTD – 99.4%, Target – 100%). A system error with the gas database meant a number of properties were missed in Q4, but this has now been rectified
  - Repairs completed within 14 days (Actual YTD – 79%, Target – 80%). The Q4 score of 82% exceeded target
  - Number of licenced HMOs (Actual YTD – 3,401, Target – 3,500) fell from Green in Q3, but is only underachieving by 99 HMOs
- 3.34 Three housing indicators have received a Red rating for Q4.
- Re-let times for major voids and minor voids (Actual YTD – 89.5, Target – 76 and Actual YTD – 37, Target – 24 for major and minor respectively), although in both cases this is a significant improvement on the same period last year. Over 100 long-term void properties that had not been recorded by BHP have been re-let in this time.
  - Percentage of calls answered in three minutes (Actual YTD – 65.4%, Target – 80%) declined due to changes in hardware and software
  - Percentage of rent collected (Actual YTD – 98.6%, Target – 99.5%) has declined from Amber to Red due to the impact of the Universal Credit rollout, with an average of 100 new claims per month since November 2018

- 3.35 Performance indicators for sports centre visits and engagement levels at Willesden Green library are both exceeding target and have a Green RAG status, despite external factors such as unexpected closures.
- 3.36 The number of active borrowers is Amber having been fairly static each quarter but falling slightly from the 17/18 Outturn. The Performance Insight and Intelligence team is running an in depth research project to understand library users' behavioural patterns and deliver increased library usage following the creation of a targeted action plan.
- 3.37 The number of online interactions fell significantly in Q4 and has a RAG status of Red although it had been Amber in Q3 (Actual YTD – 2.98m, Target – 3.2m). This has been influenced by alterations to the page hierarchy of the Brent website and Facebook algorithm which have made content harder to access.

### **Better Local**

- 3.38 There were 633 people registered as a volunteer at year end, falling short of the 750 target and receiving a Red RAG status. This is due to the closure of the Volunteering Brent service, however all volunteer registrations submitted have been processed to allow potential volunteers to explore opportunities. The income secured by voluntary groups is also Red rated (Actual YTD – £355k, Target – £480k) although it is hoped that this is due to delays in grant processing and improvement will be seen in Q1 2019/20.
- 3.39 Although the number of days to process benefit claims (Actual YTD – 11.32, Target – 8.7) and calls answered by BCS (Actual YTD – 71.33%, Target – 80%) have both been rated Red throughout the year, their Q4 performance (7.09 and 80.29% respectively) has exceeded target and shows significant improvement in service delivery. Regular monitoring and prioritisation has allowed for improvement in processing benefit claims, and the implementation of robotics systems in April 2019 to process low level work will further increase staff capacity to deal with more complex tasks. The percentage of calls answered has increased steadily over the year from a low of 66.75% in Q2 and the improved delivery in Q4 is against an increase in call volume. A Rapid Improvement Team has been established to focus on the causes of call failure and resolution.
- 3.40 The four complaints KPIs all have a RAG rating of Red as they did not meet the target of 100% of cases responded to within timescale. However, the annual performance in 2018/19 for Stage 1 Corporate and Statutory and Stage 2 Corporate complaints is an improvement on the previous year. The number of Stage 2 Statutory cases is very low (only seven were received in Q4, five of which were responded to in time) which has a big impact on the reported percentages. These cases are typically complex and are being monitored by



the Corporate Complaints Team and CYP Management to improve the timeliness of response.

- 3.41 The percentage of Subject Access Requests responded to within the timescale remains Red (Actual YTD – 85%, Target – 95%). Although the individual Q4 result was quite good at 93%, performance is impacted from lower scoring periods earlier in the year as during Q2 the statutory timescale for SARs was reduced from 40 days to one calendar month. A tracker has been created to help improve timeliness of response are not missed and the development of a new casework management system will help streamline the administrative process.

### **Borough Plan 2019-23**

- 3.42 Brent Council's new Borough plan was finalised at Full Council earlier this year and took effect from April 2019. The new plan titled "Building a Better Brent" includes Brent's vision for the next 4 years sets out five overarching priorities for the Council. These priorities are:

- Every opportunity to succeed
- A future built for everyone, an economy fit for all
- Strong foundations
- A borough where we can feel safe, secure, happy and healthy
- A cleaner, more considerate Brent

- 3.43 The new borough plan will have a delivery plans developed each year in line with the priorities and needs of the Councils.

- 3.44 Considering the current suite of KPIs against their expected priority in the 2019-23 Borough Plan, performance would break down as follows:

3.45 **Strong Foundations**

There are 29 indicators for Strong Foundations: six are on or above target (Green status) and six just off target (Amber status). 11 indicators are significantly off target (Red status). Six measures are contextual and do not have a RAG rating.

3.46 **Every Opportunity To Succeed**

21 indicators relate to the Every Opportunity to Succeed priority. 15 have a Green RAG status, four are Amber and one is Red.

3.47 **A Future Built For Everyone, An Economy Fit For All**

Of the 24 indicators under this priority, nine have a Green RAG status, six have an Amber RAG status and another six have a Red RAG status. Three measures are contextual and do not have a RAG rating.

3.48 **A Cleaner, More Considerate Brent**

There are 11 indicators for A Cleaner, More Considerate Brent. Three of them

have a Green RAG status, one Amber and two Red. Five additional measures for this priority are contextual only.

**3.49 A Borough Where We Can All Feel Safe, Secure, Happy And Healthy**

The remaining 18 indicators align with this priority. Nine have a RAG status of Green, four are Amber and one is Red. Four indicators are awaiting data Q4 data due to delays in publishing by Public Health England.

- 1.5 Quarterly performance reports to Cabinet for 2019/20 will be presented with a new suite of measures which will be linked with the Year 1 delivery plan.

**4.0 Financial Implications**

- 4.1 None

**5.0 Legal Implications**

- 5.1 In Table 3 of Part 3 of the council's constitution, it states that the Cabinet is responsible for formulating and preparing a sustainable community strategy and then submitting the same to Full Council for consideration and adoption or approval. The Sustainable Community Strategy constitutes part of the council's Policy Framework. The Council's Borough Plan 2019-23, which is its current sustainable community strategy, was agreed by Full Council in 2019.

**6.0 Equality Implications**

- 6.1 There are no direct diversity implications. However, the report includes performance measures related to the council's diversity objectives and is part of the framework for ensuring delivery of these key outcomes. Service areas have the responsibility for managing the delivery and performance of their services. Therefore, the service area would also need to consider if a variation in performance could lead to equality implications at a service level.

**7.0 Consultation with Ward Members and Stakeholders**

- 7.1 Not applicable.

**8.0 Human Resources/Property Implications (if appropriate)**

- 8.1 None

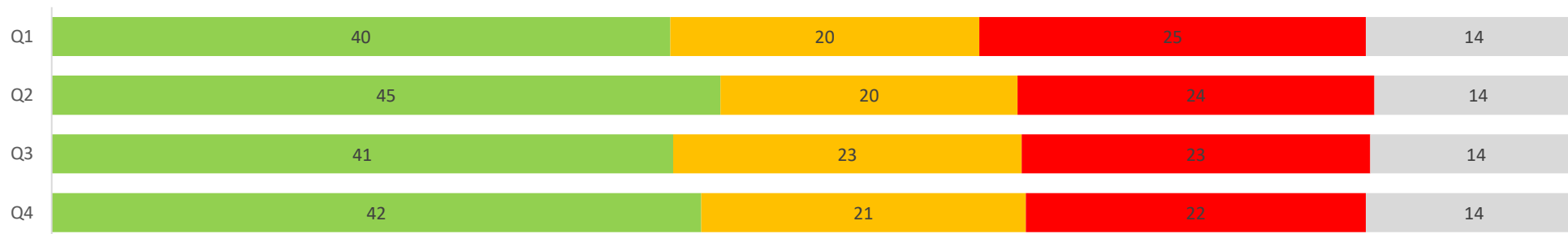
**Report sign off:**

**PETER GADSDON**

Assistant Chief Executive

## Cabinet - Corporate Performance Report June 2019

### Brent 2020 and Borough Plan Performance Summary – Quarter 4 (January 2019 to March 2019)



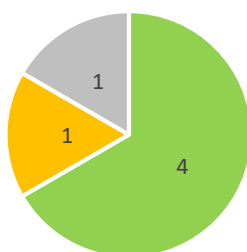
#### Brent 2020 Priorities

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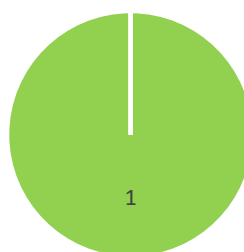
Brent 2020 - Employment & Skills



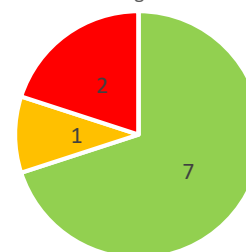
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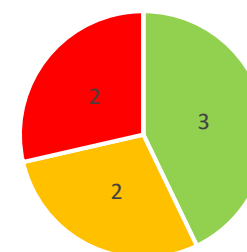
Brent 2020 - Business & Housing Growth



Brent 2020 - Demand Management

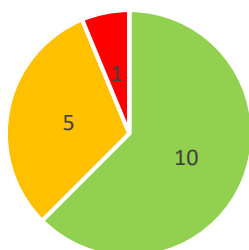


Brent 2020 - Raising Income

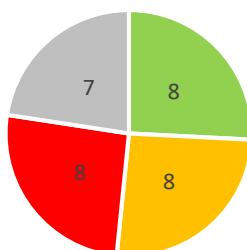


#### 2015-19 Borough Plan Priorities

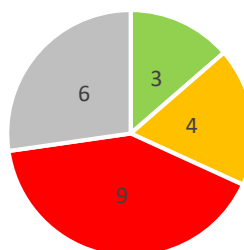
Better Lives



Better Place

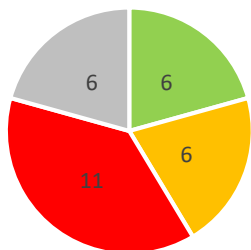


Better Local

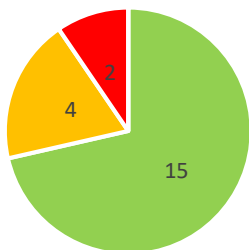


## 2019-23 Borough Plan Priorities

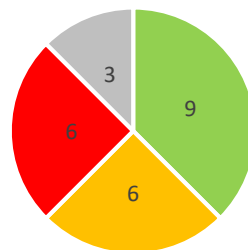
Strong Foundations



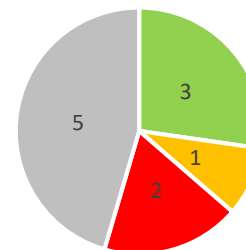
Every Opportunity To Succeed



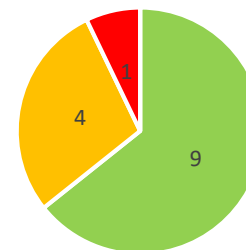
A Future Built For Everyone,  
An Economy Fit For All



A Cleaner, More Considerate  
Brent



A Borough Where We Can All Feel  
Safe, Secure, Happy And Healthy



## Cabinet - Corporate Performance Report June 2019

### Brent 2020 and Borough Plan Performance Summary – Quarter 4 (January 2019 to March 2019)

#### Key for Performance Tables (all priorities)

Unless otherwise defined, performance information is assessed using the following tolerances to give a RAG rating:

Green		At target or exceeding target
Amber		0.01% - 5% outside target*
Red		Greater than 5% outside target*
Contextual		No target set

*\*please note some indicators are set at a 10% tolerance due to national requirement*

#### Table of contents:

Strategic Plan	Priority	Performance measures
Brent 2020	Employment & Skills	4
	Regeneration	6
	Business & Housing	8
	Demand Management	9
	Raising Income	13
Borough Plan 2015-2019	Better Lives	16
	Better Place	19
	Better Local	24
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BRENT 2020 - EMPLOYMENT AND SKILLS

KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS																																					
Priority Areas - The Living Room (TLR) - Employment Outcomes	40	14	40	40	37	131	45	Green	<p><b>Comment:</b> Excellent performance by the team to continue consistently high outcomes. Support provided in development and delivery of community hubs.</p> <p><b>Action:</b> Support Community hub openings, starting with South Kilburn.</p>																																					
	<div><div>Priority Areas - The Living Room (TLR) - Employment Outcomes</div><table><tr><th>Month</th><th>Actual</th><th>Target</th></tr><tr><td>Apr-18</td><td>1</td><td>1</td></tr><tr><td>May-18</td><td>6</td><td>1</td></tr><tr><td>Jun-18</td><td>7</td><td>1</td></tr><tr><td>Jul-18</td><td>12</td><td>1</td></tr><tr><td>Aug-18</td><td>12</td><td>1</td></tr><tr><td>Sep-18</td><td>16</td><td>1</td></tr><tr><td>Oct-18</td><td>15</td><td>1</td></tr><tr><td>Nov-18</td><td>14</td><td>1</td></tr><tr><td>Dec-18</td><td>11</td><td>1</td></tr><tr><td>Jan-19</td><td>13</td><td>1</td></tr><tr><td>Feb-19</td><td>12</td><td>1</td></tr><tr><td>Mar-19</td><td>12</td><td>1</td></tr></table></div>									Month	Actual	Target	Apr-18	1	1	May-18	6	1	Jun-18	7	1	Jul-18	12	1	Aug-18	12	1	Sep-18	16	1	Oct-18	15	1	Nov-18	14	1	Dec-18	11	1	Jan-19	13	1	Feb-19	12	1	Mar-19
Month	Actual	Target																																												
Apr-18	1	1																																												
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KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS																																							
Brent Works - Apprenticeship Outcomes	40	27	16	6	7	56	50	Green	<p><b>Comment:</b> The team exceeded the yearly target even with a number of changes to the team and reduction of staff working on the vacancies. Successes have included Hyperoptic and Construction Apprenticeships</p> <p><b>Action:</b> Expansion to the team and a focus on Apprenticeships for SMEs and Levy payers will increase Apprenticeship activity.</p>																																							
	<div><div>Brent Works - Apprenticeship Outcomes</div><table><tr><th>Month</th><th>Actual</th><th>Target</th></tr><tr><td>Apr-18</td><td>21</td><td>1</td></tr><tr><td>May-18</td><td>5</td><td>1</td></tr><tr><td>Jun-18</td><td>1</td><td>1</td></tr><tr><td>Jul-18</td><td>3</td><td>1</td></tr><tr><td>Aug-18</td><td>5</td><td>1</td></tr><tr><td>Sep-18</td><td>8</td><td>1</td></tr><tr><td>Oct-18</td><td>3</td><td>1</td></tr><tr><td>Nov-18</td><td>2</td><td>1</td></tr><tr><td>Dec-18</td><td>1</td><td>1</td></tr><tr><td>Jan-19</td><td>3</td><td>1</td></tr><tr><td>Feb-19</td><td>1</td><td>1</td></tr><tr><td>Mar-19</td><td>3</td><td>1</td></tr></table></div>									Month	Actual	Target	Apr-18	21	1	May-18	5	1	Jun-18	1	1	Jul-18	3	1	Aug-18	5	1	Sep-18	8	1	Oct-18	3	1	Nov-18	2	1	Dec-18	1	1	Jan-19	3	1	Feb-19	1	1	Mar-19	3	1
	Month	Actual	Target																																													
Apr-18	21	1																																														
May-18	5	1																																														
Jun-18	1	1																																														
Jul-18	3	1																																														
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Sep-18	8	1																																														
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KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS																																							
Brent Works - Job Outcomes	86	36	27	28	24	115	100	Green	<p><b>Comment:</b> Excellent performance by the team to continue to deliver consistently high outcomes. Seasonal peaks and troughs as expected.</p> <p><b>Action:</b> Wembley Job Show 21st May and increased staff on the team will drive performance.</p>																																							
	<div><div>Brent Works Job Outcomes</div><table><tr><th>Month</th><th>Actual</th><th>Target</th></tr><tr><td>Apr-18</td><td>7</td><td>7</td></tr><tr><td>May-18</td><td>10</td><td>7</td></tr><tr><td>Jun-18</td><td>19</td><td>7</td></tr><tr><td>Jul-18</td><td>13</td><td>7</td></tr><tr><td>Aug-18</td><td>7</td><td>7</td></tr><tr><td>Sep-18</td><td>7</td><td>7</td></tr><tr><td>Oct-18</td><td>6</td><td>7</td></tr><tr><td>Nov-18</td><td>10</td><td>7</td></tr><tr><td>Dec-18</td><td>12</td><td>7</td></tr><tr><td>Jan-19</td><td>15</td><td>7</td></tr><tr><td>Feb-19</td><td>5</td><td>7</td></tr><tr><td>Mar-19</td><td>4</td><td>7</td></tr></table></div>									Month	Actual	Target	Apr-18	7	7	May-18	10	7	Jun-18	19	7	Jul-18	13	7	Aug-18	7	7	Sep-18	7	7	Oct-18	6	7	Nov-18	10	7	Dec-18	12	7	Jan-19	15	7	Feb-19	5	7	Mar-19	4	7
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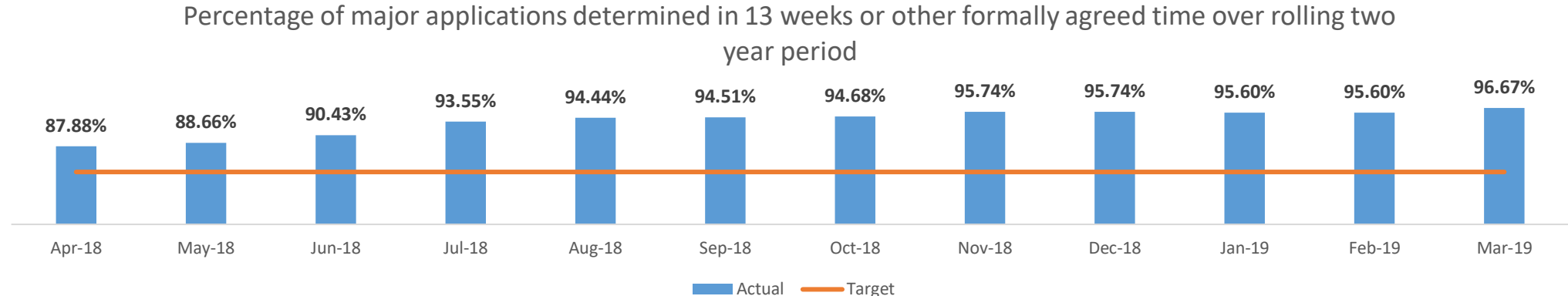
BRENT 2020 - EMPLOYMENT AND SKILLS

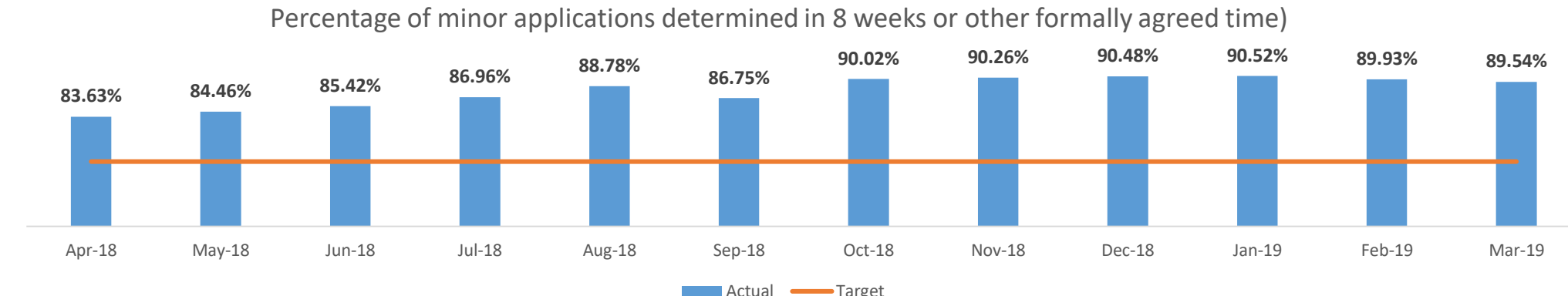
KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS																																							
Brent Starts Achievement Rate <i>(now referred to by Education and Skills Funding Agency (ESFA) as Pass Rate)</i>	93%	95.3%	94.9%	95.4%	96.0%	96.0%	95%	Green	<b>Comment:</b> Pass rates continue to grow. The variance between Oct & Nov is the introduction of 18/19 academic year. Oct seen a final pass rate for 17/18 academic year as 94.1%. <b>Action:</b> Mock Ofsted completed in March 2019 to continue Brent Start's work towards becoming Outstanding.																																							
LEAD MEMBER: Cllr Agha	<div>Brent Starts Achievement Rate</div> <table><tr><th>Month</th><th>Actual</th><th>Target</th></tr><tr><td>Apr-18</td><td>95.3%</td><td></td></tr><tr><td>May-18</td><td>95.3%</td><td></td></tr><tr><td>Jun-18</td><td>95.3%</td><td></td></tr><tr><td>Jul-18</td><td>95.3%</td><td></td></tr><tr><td>Aug-18</td><td>95.3%</td><td></td></tr><tr><td>Sep-18</td><td>94.0%</td><td></td></tr><tr><td>Oct-18</td><td>94.1%</td><td></td></tr><tr><td>Nov-18</td><td>96.0%</td><td></td></tr><tr><td>Dec-18</td><td>96.0%</td><td></td></tr><tr><td>Jan-19</td><td>96.0%</td><td></td></tr><tr><td>Feb-19</td><td>96.0%</td><td></td></tr><tr><td>Mar-19</td><td>96.0%</td><td></td></tr></table>									Month	Actual	Target	Apr-18	95.3%		May-18	95.3%		Jun-18	95.3%		Jul-18	95.3%		Aug-18	95.3%		Sep-18	94.0%		Oct-18	94.1%		Nov-18	96.0%		Dec-18	96.0%		Jan-19	96.0%		Feb-19	96.0%		Mar-19	96.0%	
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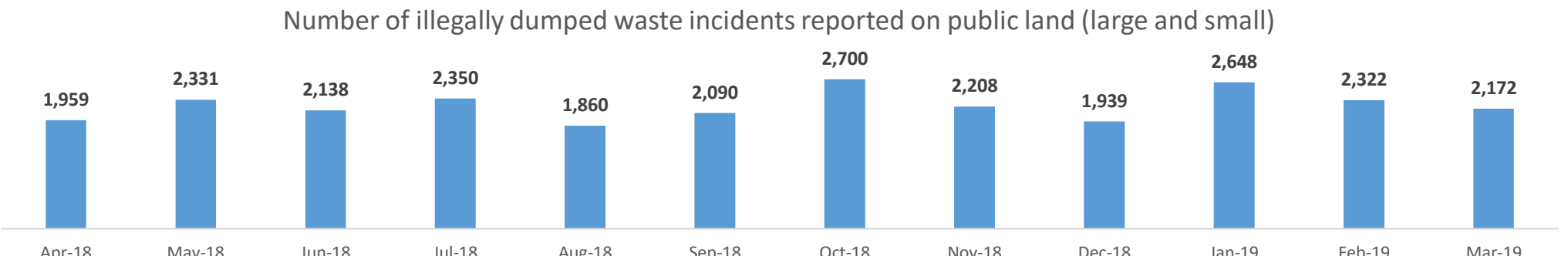
KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS																		
Percentage of care leavers (19-21 year olds) in education, employment or training (EET)	51.1%	49.2%	47.5%	46%	55%	55%	52%	Green	<b>Comment:</b> Some of the young people in the cohort are UASC with no recourse to public funds who have employment restrictions applied. A range of support opportunities are offered, working with partner agencies that has contributed to the recent improvement in performance.																		
	<div>Percentage of care leavers in education, employment or training</div> <table><tr><th>Quarter</th><th>Actual</th><th>Target</th></tr><tr><td>Q4 17/18</td><td>44%</td><td></td></tr><tr><td>Q1 18/19</td><td>49.2%</td><td></td></tr><tr><td>Q2 18/19</td><td>47.5%</td><td></td></tr><tr><td>Q3 18/19</td><td>46%</td><td></td></tr><tr><td>Q4 18/19</td><td>55%</td><td></td></tr></table>									Quarter	Actual	Target	Q4 17/18	44%		Q1 18/19	49.2%		Q2 18/19	47.5%		Q3 18/19	46%		Q4 18/19	55%	
	Quarter	Actual	Target																								
Q4 17/18	44%																										
Q1 18/19	49.2%																										
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LEAD MEMBER: Cllr Agha																											
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KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS																		
Percentage of academic age 16-17 year olds who are not in education, employment or training (NEET)	1.6%	1.5%	0.8%	1.7%	1.4%	1.4%	1.8%	Green	<b>Comment:</b> This indicator continues to demonstrate strong performance in this area, supported by effective monitoring and a high-performing provider contracted to the LA.																		
	<div>Percentage of 16 to 18 year olds who are not in education, employment or training (NEET)</div> <table><tr><th>Quarter</th><th>Actual</th><th>Target</th></tr><tr><td>Q4 17/18</td><td>1.6%</td><td></td></tr><tr><td>Q1 18/19</td><td>1.5%</td><td></td></tr><tr><td>Q2 18/19</td><td>0.8%</td><td></td></tr><tr><td>Q3 18/19</td><td>1.7%</td><td></td></tr><tr><td>Q4 18/19</td><td>1.40%</td><td></td></tr></table>									Quarter	Actual	Target	Q4 17/18	1.6%		Q1 18/19	1.5%		Q2 18/19	0.8%		Q3 18/19	1.7%		Q4 18/19	1.40%	
	Quarter	Actual	Target																								
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Q1 18/19	1.5%																										
Q2 18/19	0.8%																										
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Q4 18/19	1.40%																										
LEAD MEMBER: Cllr Agha																											
STRATEGIC DIRECTOR: Gail Tolley																											
GOOD IS: Smaller is better																											
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BRENT 2020 - REGENERATION (Physical, Economic & Social)

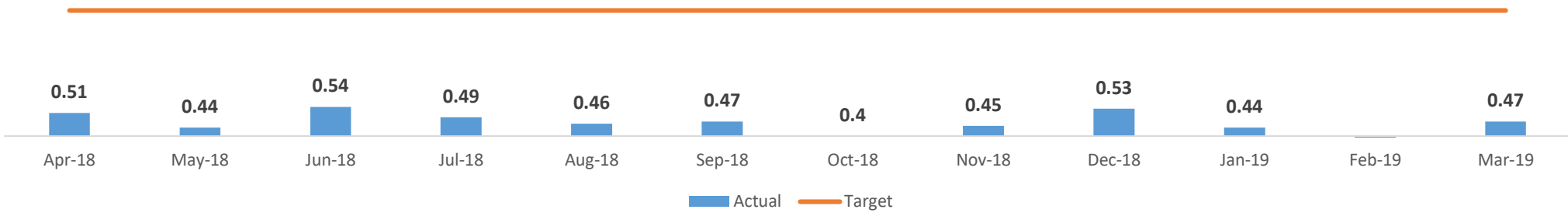
KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS																																									
Percentage of major applications determined in 13 weeks or other formally agreed time over rolling two year period	85.7%	89%	94.20%	95.39%	95.96%	96.67%	82%	Green	<p><b>Comment:</b> Two Year rolling for all figures. Performance consistently well above targets throughout 2018-19 financial year</p>																																									
	<p>Percentage of major applications determined in 13 weeks or other formally agreed time over rolling two year period</p>  <table><tr><th>Month</th><th>Actual</th><th>Target</th></tr><tr><td>Apr-18</td><td>87.88%</td><td>82%</td></tr><tr><td>May-18</td><td>88.66%</td><td>82%</td></tr><tr><td>Jun-18</td><td>90.43%</td><td>82%</td></tr><tr><td>Jul-18</td><td>93.55%</td><td>82%</td></tr><tr><td>Aug-18</td><td>94.44%</td><td>82%</td></tr><tr><td>Sep-18</td><td>94.51%</td><td>82%</td></tr><tr><td>Oct-18</td><td>94.68%</td><td>82%</td></tr><tr><td>Nov-18</td><td>95.74%</td><td>82%</td></tr><tr><td>Dec-18</td><td>95.74%</td><td>82%</td></tr><tr><td>Jan-19</td><td>95.60%</td><td>82%</td></tr><tr><td>Feb-19</td><td>95.60%</td><td>82%</td></tr><tr><td>Mar-19</td><td>96.67%</td><td>82%</td></tr></table>										Month	Actual	Target	Apr-18	87.88%	82%	May-18	88.66%	82%	Jun-18	90.43%	82%	Jul-18	93.55%	82%	Aug-18	94.44%	82%	Sep-18	94.51%	82%	Oct-18	94.68%	82%	Nov-18	95.74%	82%	Dec-18	95.74%	82%	Jan-19	95.60%	82%	Feb-19	95.60%	82%	Mar-19	96.67%	82%	
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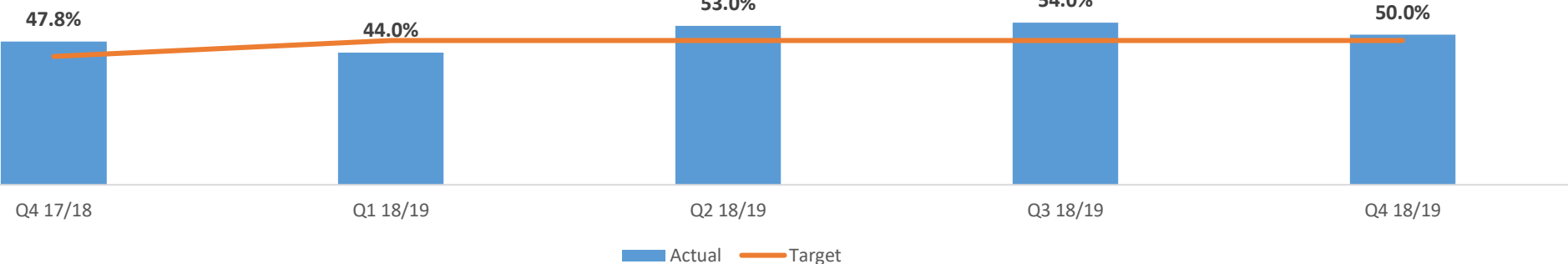
KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS																																								
Percentage of non majors (minors and others) applications determined in 8 weeks or other formally agreed time over rolling two year	78.0%	84.50%	87.50%	90.25%	90.00%	89.54%	76%	Green	<p><b>Comment:</b> Two Year rolling for all figures. Performance consistently well above targets throughout 2018-19 financial year</p>																																								
	<p>Percentage of minor applications determined in 8 weeks or other formally agreed time)</p>  <table><tr><th>Month</th><th>Actual</th><th>Target</th></tr><tr><td>Apr-18</td><td>83.63%</td><td>76%</td></tr><tr><td>May-18</td><td>84.46%</td><td>76%</td></tr><tr><td>Jun-18</td><td>85.42%</td><td>76%</td></tr><tr><td>Jul-18</td><td>86.96%</td><td>76%</td></tr><tr><td>Aug-18</td><td>88.78%</td><td>76%</td></tr><tr><td>Sep-18</td><td>86.75%</td><td>76%</td></tr><tr><td>Oct-18</td><td>90.02%</td><td>76%</td></tr><tr><td>Nov-18</td><td>90.26%</td><td>76%</td></tr><tr><td>Dec-18</td><td>90.48%</td><td>76%</td></tr><tr><td>Jan-19</td><td>90.52%</td><td>76%</td></tr><tr><td>Feb-19</td><td>89.93%</td><td>76%</td></tr><tr><td>Mar-19</td><td>89.54%</td><td>76%</td></tr></table>										Month	Actual	Target	Apr-18	83.63%	76%	May-18	84.46%	76%	Jun-18	85.42%	76%	Jul-18	86.96%	76%	Aug-18	88.78%	76%	Sep-18	86.75%	76%	Oct-18	90.02%	76%	Nov-18	90.26%	76%	Dec-18	90.48%	76%	Jan-19	90.52%	76%	Feb-19	89.93%	76%	Mar-19	89.54%	76%
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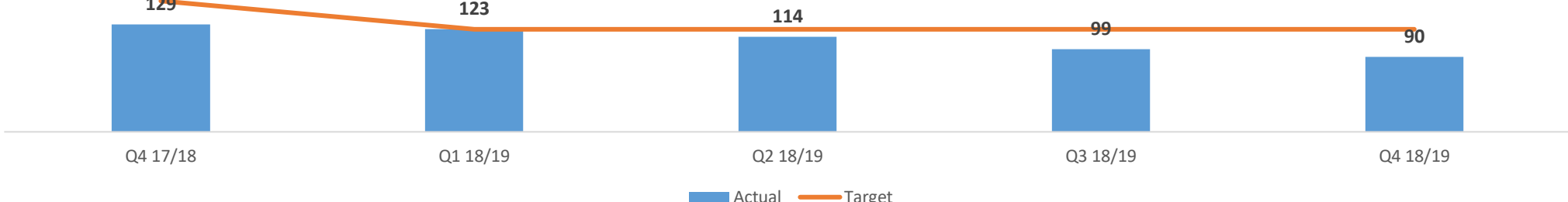
KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS																													
Number of illegally dumped waste incidents reported on public land (large and small)	18,526	6,428	6,300	6,847	7,142	26,717	-	Contextual	<p><b>Comment:</b> Continued promotion of the Cleaner Brent app and the use of Veolia's technology and reporting via the contact centre have kept levels of reporting on the increase. This is positive as it ensures illegal waste dumping is removed quickly</p> <p><b>Action:</b> We are continuing to promote the “Love Where You Live” campaign and the area based Neighbourhood Managers and Enforcement Officers continue to tackle the issue of illegal rubbish dumping.</p>																													
	<div>Number of illegally dumped waste incidents reported on public land (large and small)</div>  <table><thead><tr><th>Month</th><th>Actual</th></tr></thead><tbody><tr><td>Apr-18</td><td>1,959</td></tr><tr><td>May-18</td><td>2,331</td></tr><tr><td>Jun-18</td><td>2,138</td></tr><tr><td>Jul-18</td><td>2,350</td></tr><tr><td>Aug-18</td><td>1,860</td></tr><tr><td>Sep-18</td><td>2,090</td></tr><tr><td>Oct-18</td><td>2,700</td></tr><tr><td>Nov-18</td><td>2,208</td></tr><tr><td>Dec-18</td><td>1,939</td></tr><tr><td>Jan-19</td><td>2,648</td></tr><tr><td>Feb-19</td><td>2,322</td></tr><tr><td>Mar-19</td><td>2,172</td></tr></tbody></table>												Month	Actual	Apr-18	1,959	May-18	2,331	Jun-18	2,138	Jul-18	2,350	Aug-18	1,860	Sep-18	2,090	Oct-18	2,700	Nov-18	2,208	Dec-18	1,939	Jan-19	2,648	Feb-19	2,322	Mar-19	2,172
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LEAD MEMBER: Cllr Sheth									BENCHMARK DATA																													
STRATEGIC DIRECTOR: Amar Dave																																						
GOOD IS: Smaller is better																																						



BRENT 2020 - REGENERATION (Physical, Economic & Social)

KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS	
Average time taken to remove illegally dumped waste (days)	0.68	0.50	0.47	0.46	0.43	0.47	1	Green	<p><b>Comment:</b> Despite the high number of reports to the Council, performance remains ahead of target, with YTD performance showing an improvement of compared to 2017/18.</p>	
	Average time taken to remove illegally dumped waste (days)									
										
LEAD MEMBER: Cllr Sheth										
STRATEGIC DIRECTOR: Amar Dave										
GOOD IS: Smaller is better										

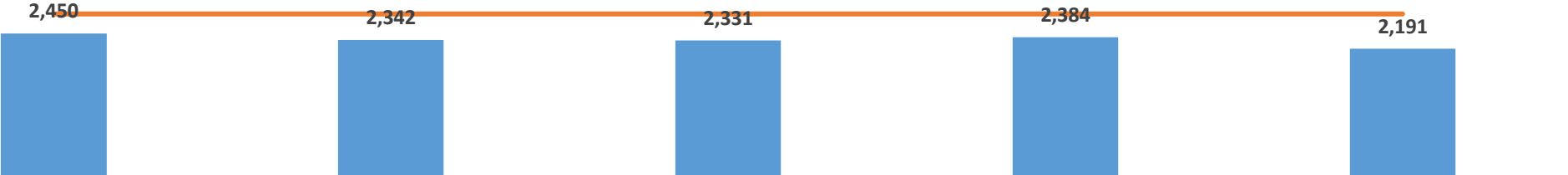
KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS
Reoffending rate by young offenders per cohort	47.8%	44.0%	53.0%	54.0%	50.0%	50.0%	48.1%	Amber	<p><b>Comment:</b> The 50% figure is determined by tracking subsequent offending within the YOS cohort for the period January 2017 to March 2017. The rate of reoffending can fluctuate significantly due to the relatively small size of the cohort (70 young people).</p> <p><b>Action:</b> Brent YOS uses Youth Justice Board developed tools to reduce reoffending through an increasingly sophisticated understanding of offending behaviour and trends.</p>
	<div>Reoffending rate by young offenders per cohort</div>  <div>Q4 17/18      Q1 18/19      Q2 18/19      Q3 18/19      Q4 18/19</div> <div>Actual      Target</div>								
LEAD MEMBER: Cllr Patel									BENCHMARK DATA
STRATEGIC DIRECTOR: Gail Tolley									
GOOD IS: Smaller is better									

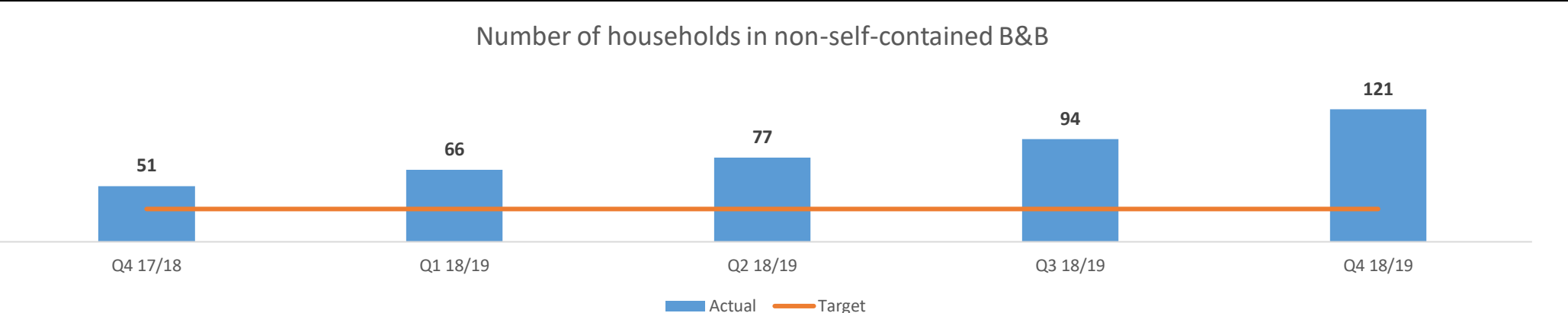
KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS
First time entrants to the Youth Justice System aged 10-17 per cohort	129	123	114	99	90	90	123	Green	<p><b>Comment:</b> The data for this indicator comes from the Police National Computer and is published by the MoJ. The data is shown in rolling full-years. The latest figures available are for October 2017 to September 2018.</p> <p>Brent's long term trend shows a decline in the number of FTEs. The latest rate is at its lowest recorded point (since 2007).</p>
	<p>First time entrants to the Youth Justice System aged 10-17 per cohort</p>  <p>Q4 17/18      Q1 18/19      Q2 18/19      Q3 18/19      Q4 18/19</p> <p>Actual      Target</p>								
LEAD MEMBER: Cllr Patel									
STRATEGIC DIRECTOR: Gail Tolley									
GOOD IS: Smaller is better									


BRENT 2020 - BUSINESS AND HOUSING GROWTH

KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS																			
Number of Empty properties refurbished and brought back into use within the Borough	50	20	28	50	21	119	50	Green	<p><b>Comment:</b> This year has seen results equal to years gone by and over doubled this year target.</p>																			
	<div>Empty properties brought back into use</div> <table><tr><th>Quarter</th><th>Actual</th><th>Target</th></tr><tr><td>Q4 17/18</td><td>13</td><td>13</td></tr><tr><td>Q1 18/19</td><td>20</td><td>13</td></tr><tr><td>Q2 18/19</td><td>28</td><td>13</td></tr><tr><td>Q3 18/19</td><td>50</td><td>13</td></tr><tr><td>Q4 18/19</td><td>21</td><td>13</td></tr></table>										Quarter	Actual	Target	Q4 17/18	13	13	Q1 18/19	20	13	Q2 18/19	28	13	Q3 18/19	50	13	Q4 18/19	21	13
	Quarter	Actual	Target																									
Q4 17/18	13	13																										
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LEAD MEMBER: Cllr Southwood																												
STRATEGIC DIRECTOR: Phil Porter																												
GOOD IS: Bigger is better									BENCHMARK DATA																			

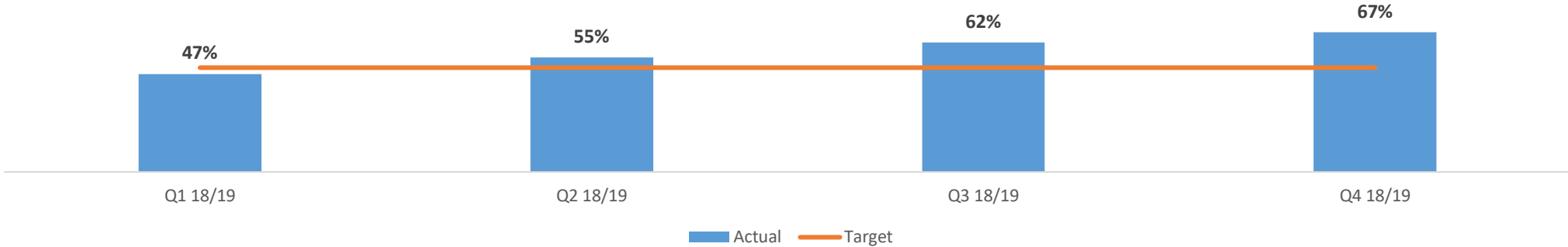
BRENT 2020 - DEMAND MANAGEMENT

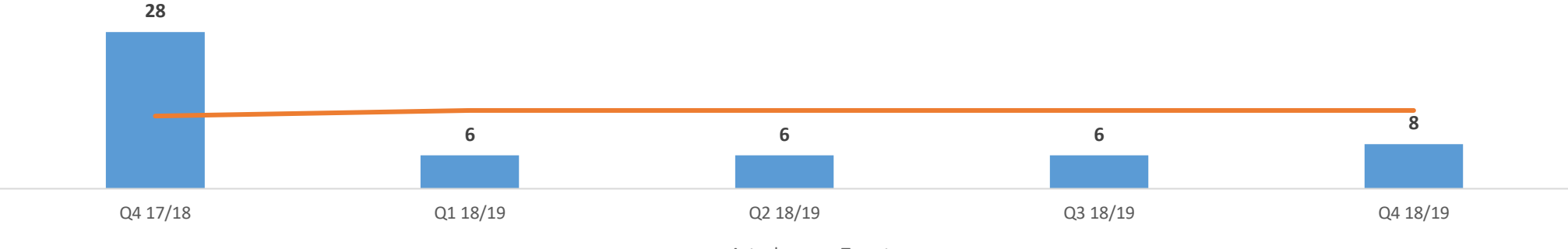
KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS	
Number of households (families & singles) in Temporary accommodation (TA)	2,450	2,342	2,331	2,384	2,191	2,191	2,775	Green	<p><b>Comment:</b> Despite the increase in homelessness demand, we continue to achieve a downward trend in the number of households living in TA.</p>	
	<div>Households in Temporary Accommodation</div>  <div>Q4 17/18      Q1 18/19      Q2 18/19      Q3 18/19      Q4 18/19</div> <div>Actual      Target</div>									
LEAD MEMBER: Cllr Southwood									BENCHMARK DATA	
STRATEGIC DIRECTOR: Phil Porter										
GOOD IS: Smaller is better										

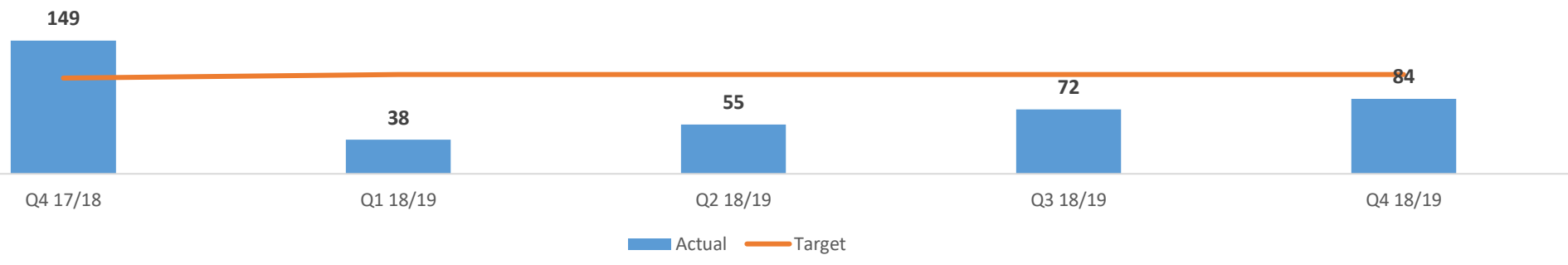
KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS																			
Number of households in non-self-contained Bed & Breakfast (B&B)	51	66	77	94	121	121	30	Red	<p><b>Comment:</b> The requirements of the Homelessness Reduction Act has seen a significant increase in demand for emergency accommodation and the time households spend in this type of accommodation, whilst their applications are being considered.</p>																			
	<p>Number of households in non-self-contained B&amp;B</p>  <table border="1"><thead><tr><th>Period</th><th>Actual</th><th>Target</th></tr></thead><tbody><tr><td>Q4 17/18</td><td>51</td><td>30</td></tr><tr><td>Q1 18/19</td><td>66</td><td>30</td></tr><tr><td>Q2 18/19</td><td>77</td><td>30</td></tr><tr><td>Q3 18/19</td><td>94</td><td>30</td></tr><tr><td>Q4 18/19</td><td>121</td><td>30</td></tr></tbody></table>									Period	Actual	Target	Q4 17/18	51	30	Q1 18/19	66	30	Q2 18/19	77	30	Q3 18/19	94	30	Q4 18/19	121	30	
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KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS	
Percentage of households to whom the Council owes a main housing duty (previously reported as a number)	493 (number)	44%	43%	45%	59%	55%	50%	Amber	<p><b>Comment:</b> For the first time in recent memory, the Council accepted the main housing duty to fewer households than the number of social housing lets in the year.</p>	
	<div>Accepted homeless</div>  <p>Q1 18/19      Q2 18/19      Q3 18/19      Q4 18/19</p> <p>Actual      Target</p>									
LEAD MEMBER: Cllr Southwood									BENCHMARK DATA	
STRATEGIC DIRECTOR: Phil Porter										
GOOD IS: Smaller is better										

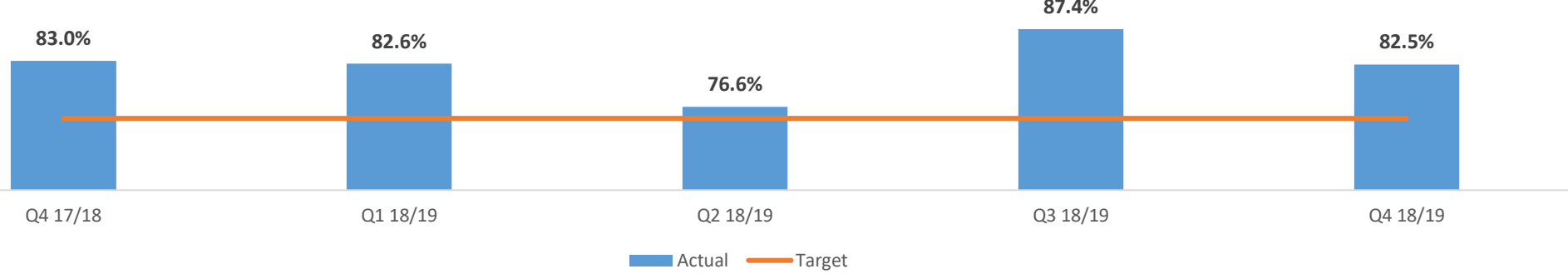
BRENT 2020 - DEMAND MANAGEMENT

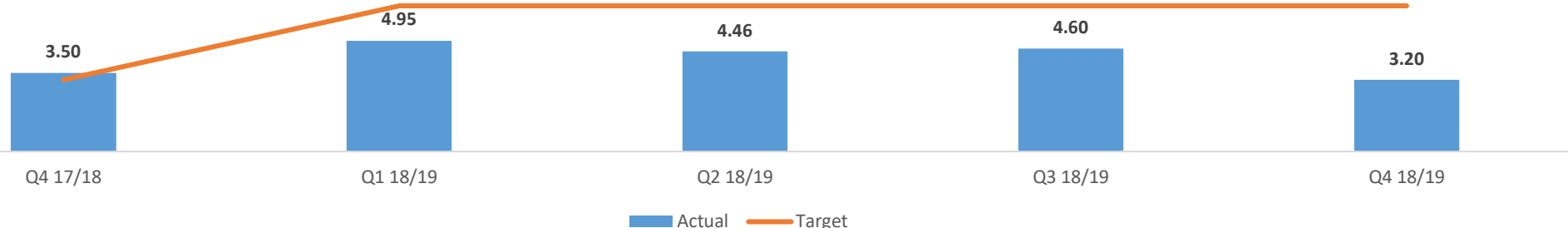
KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS															
Percentage of Homelessness prevented and relieved (previously reported as a number)	599 (number)	47%	55%	62%	67%	57%	50%	Green	<p><b>Comment:</b> Over 50% of all eligible homeless families have had their homelessness prevented or relieved in the year. This equates to 931 families helped to stay in their current accommodation or find new suitable accommodation. Performance in this area continues to improve and we believe that when the Capital Letters programme kicks off later this year, performance will get even better.</p>															
	<div>Homeless Prevention</div>  <table border="1"><thead><tr><th>Quarter</th><th>Actual</th><th>Target</th></tr></thead><tbody><tr><td>Q1 18/19</td><td>47%</td><td>50%</td></tr><tr><td>Q2 18/19</td><td>55%</td><td>50%</td></tr><tr><td>Q3 18/19</td><td>62%</td><td>50%</td></tr><tr><td>Q4 18/19</td><td>67%</td><td>50%</td></tr></tbody></table>									Quarter	Actual	Target	Q1 18/19	47%	50%	Q2 18/19	55%	50%	Q3 18/19	62%	50%	Q4 18/19	67%	50%
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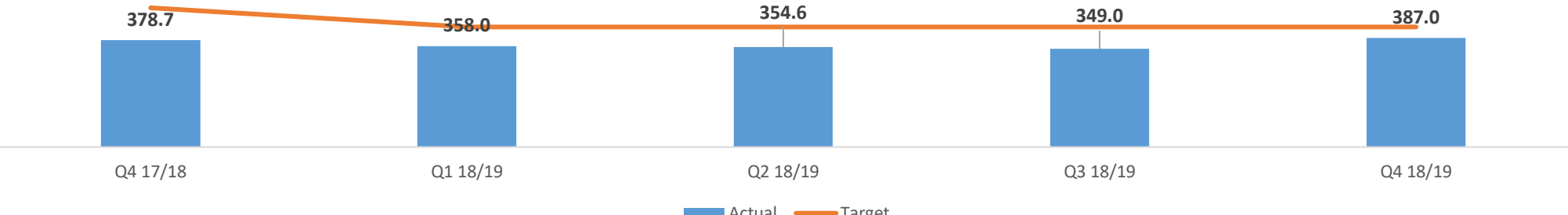
KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS
New admissions to residential & nursing care homes, 18-64 (cumulative)	28	6	6	6	8	8	14	Green	<p><b>Comment:</b> The demand for placements continues to increase, due to a variety of factors, including increasing complexity of need. A challenging target is set to encourage alternative provision. All 18-64 placements are signed off by Helen Woodland which ensures placements are made only when it is necessary, and this is usually due to a safeguarding concern.</p>
	<p>New admissions to residential &amp; nursing care homes, 18-64 (cumulative)</p>  <p>Q4 17/18                      Q1 18/19                      Q2 18/19                      Q3 18/19                      Q4 18/19</p> <p>Actual      Target</p>								
LEAD MEMBER: Cllr Farah									
STRATEGIC DIRECTOR: Phil Porter									
GOOD IS: Smaller is better									

KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS
New admissions to residential & nursing care homes, 65+ (cumulative)	149	38	55	72	84	84	111	Green	<p><b>Comment:</b> The demand for placements has increased due to the increasing population and people living longer with increasingly complex conditions. A challenging target is set to encourage alternative provision. All placements are signed off by Service Managers which ensures placements are made only when required, and despite delays in the delivery of Visram House, we will achieve this target.</p>
	<p>New admissions to residential &amp; nursing care homes, 65+ (cumulative)</p>  <p>Q4 17/18                      Q1 18/19                      Q2 18/19                      Q3 18/19                      Q4 18/19</p> <p>Actual      Target</p>								
LEAD MEMBER: Cllr Farah									BENCHMARK DATA
STRATEGIC DIRECTOR: Phil Porter									
GOOD IS: Smaller is better									

BRENT 2020 - DEMAND MANAGEMENT

KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS
The outcome of short-term services: sequel to service (REABLEMENT)	78.0%	82.6%	76.6%	87.4%	82.5%	76.6%	75%	Green	<b>Comment:</b> IRRS is performing well with numbers steadily increasing. Uptake has been supported by the introduction of Homefirst which allows those who will not benefit from Reablement to receive Homefirst instead meaning the service can be directed at those who will benefit from it most.
	<div>The outcome of short-term services: sequel to service (REABLEMENT)</div> 								
LEAD MEMBER: Cllr Farah									BENCHMARK DATA
STRATEGIC DIRECTOR: Phil Porter									
GOOD IS: Bigger is better									

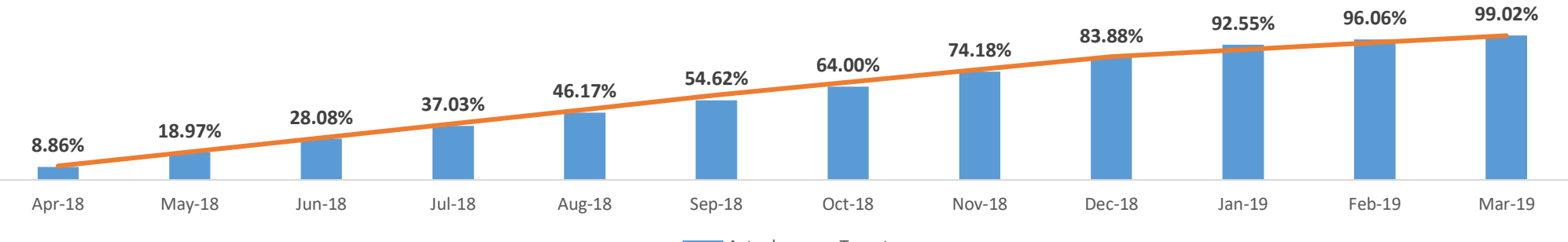
KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS
Average monthly acute delayed transfers of care (DToc) attributable to ASC	3.20	4.95	4.46	4.60	3.20	3.60	6.50	Green	<b>Comment:</b> We made significant improvements between Q2 and Q4 in reducing delays. With the introduction of Homefirst and 7 day working, we are confident that we will be able to meet the target.
	<div>The outcome of short-term services: sequel to service (REABLEMENT)</div> 								
LEAD MEMBER: Cllr Farah									BENCHMARK DATA
STRATEGIC DIRECTOR: Phil Porter									
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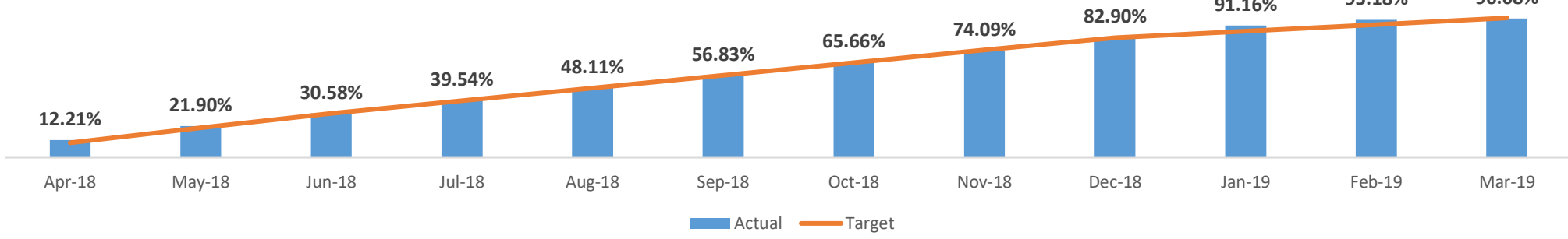
KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS
Average days between a child entering care and moving in with his/her adoptive family, for those adopted	379	358	355	349	387	398	426	Green	<p><b>Comment:</b> Current performance compares favourably against a national average of 486 days and a statistical neighbour average of 552.</p>
	<p>Average days between a child entering care and moving in with its adoptive family, for those adopted</p>  <p>Q4 17/18      Q1 18/19      Q2 18/19      Q3 18/19      Q4 18/19</p> <p>Actual      Target</p>								
LEAD MEMBER: Cllr Patel									BENCHMARK DATA
STRATEGIC DIRECTOR: Gail Tolley									
GOOD IS: Smaller is better									

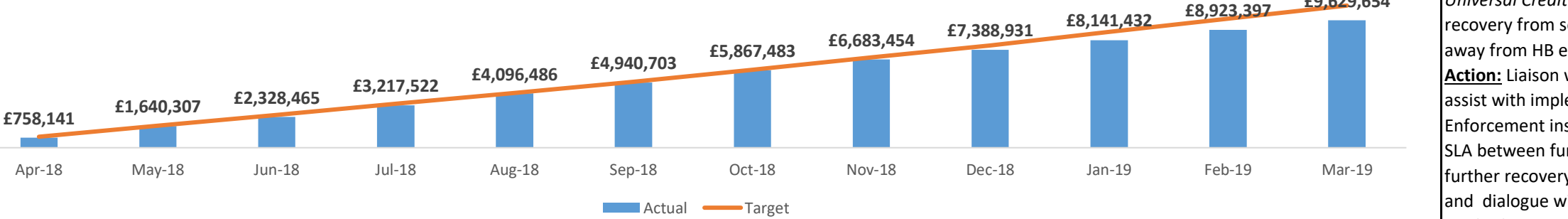
BRENT 2020 - DEMAND MANAGEMENT

KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS																		
Percentage of Looked After Children placed with foster carers	68.70%	66.67%	68.90%	63.58%	64.00%	64.00%	70%	Red	<p><b>Comment:</b> The relatively low number of children in care and the relatively high number of 16 and 17 year olds placed in semi-independent accommodation continues to impact upon this KPI.</p>																		
	<p>Percentage of Looked After Children placed with foster carers</p> <table><thead><tr><th>Period</th><th>Actual</th><th>Target</th></tr></thead><tbody><tr><td>Q4 17/18</td><td>65.30%</td><td>70%</td></tr><tr><td>Q1 18/19</td><td>66.67%</td><td>70%</td></tr><tr><td>Q2 18/19</td><td>68.90%</td><td>70%</td></tr><tr><td>Q3 18/19</td><td>63.58%</td><td>70%</td></tr><tr><td>Q4 18/19</td><td>64.00%</td><td>70%</td></tr></tbody></table>									Period	Actual	Target	Q4 17/18	65.30%	70%	Q1 18/19	66.67%	70%	Q2 18/19	68.90%	70%	Q3 18/19	63.58%	70%	Q4 18/19	64.00%	70%
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LEAD MEMBER: Cllr Patel																											
STRATEGIC DIRECTOR: Gail Tolley																											
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BRENT 2020 - RAISING INCOME

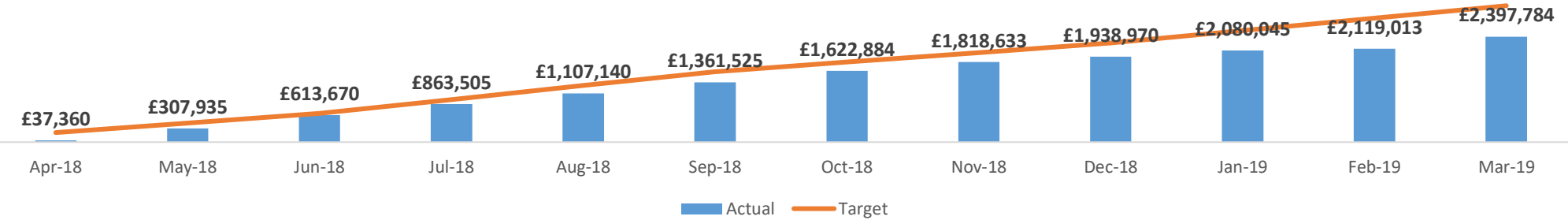
KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS																																							
Non-Domestic Business Rates (NNDR)	98.57%	46.17%	54.62%	83.88%	99.02%	99.02%	98.74%	Green	<b>Comment:</b> NNDR collection exceeded target by 0.26%, and is first time we have ever exceed 99%																																							
	<div>Non-Domestic Business Rates (NNDR)</div>  <table><thead><tr><th>Month</th><th>Actual</th><th>Target</th></tr></thead><tbody><tr><td>Apr-18</td><td>8.86%</td><td>8.86%</td></tr><tr><td>May-18</td><td>18.97%</td><td>18.97%</td></tr><tr><td>Jun-18</td><td>28.08%</td><td>28.08%</td></tr><tr><td>Jul-18</td><td>37.03%</td><td>37.03%</td></tr><tr><td>Aug-18</td><td>46.17%</td><td>46.17%</td></tr><tr><td>Sep-18</td><td>54.62%</td><td>54.62%</td></tr><tr><td>Oct-18</td><td>64.00%</td><td>64.00%</td></tr><tr><td>Nov-18</td><td>74.18%</td><td>74.18%</td></tr><tr><td>Dec-18</td><td>83.88%</td><td>83.88%</td></tr><tr><td>Jan-19</td><td>92.55%</td><td>92.55%</td></tr><tr><td>Feb-19</td><td>96.06%</td><td>96.06%</td></tr><tr><td>Mar-19</td><td>99.02%</td><td>98.74%</td></tr></tbody></table>									Month	Actual	Target	Apr-18	8.86%	8.86%	May-18	18.97%	18.97%	Jun-18	28.08%	28.08%	Jul-18	37.03%	37.03%	Aug-18	46.17%	46.17%	Sep-18	54.62%	54.62%	Oct-18	64.00%	64.00%	Nov-18	74.18%	74.18%	Dec-18	83.88%	83.88%	Jan-19	92.55%	92.55%	Feb-19	96.06%	96.06%	Mar-19	99.02%	98.74%
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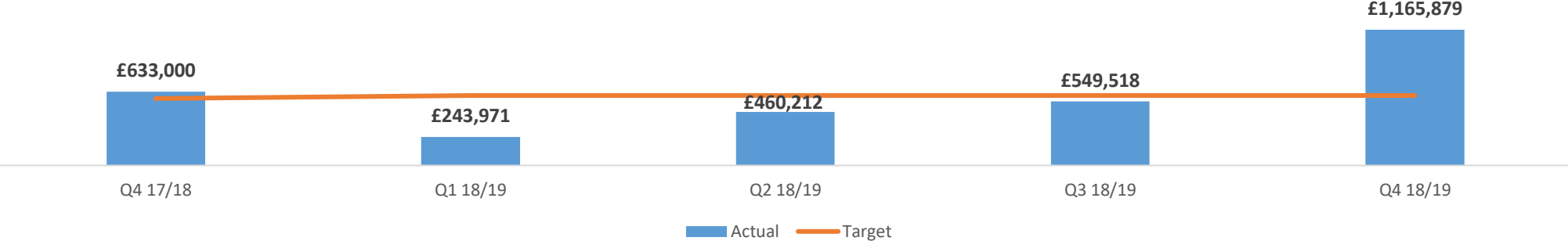
KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS																																							
Percentage of Council Tax collected	95.60%	30.58%	56.83%	82.90%	96.08%	96.08%	96.50%	Amber	<p><b>Comment:</b> CTAX collection exceeded last year by 0.34%. 96.08% is best collection rate ever achieved for council tax. The target of 96.5% was aspirational.</p> <p><b>Action:</b> To improve in 2019/20 when service returns to in house delivery.</p>																																							
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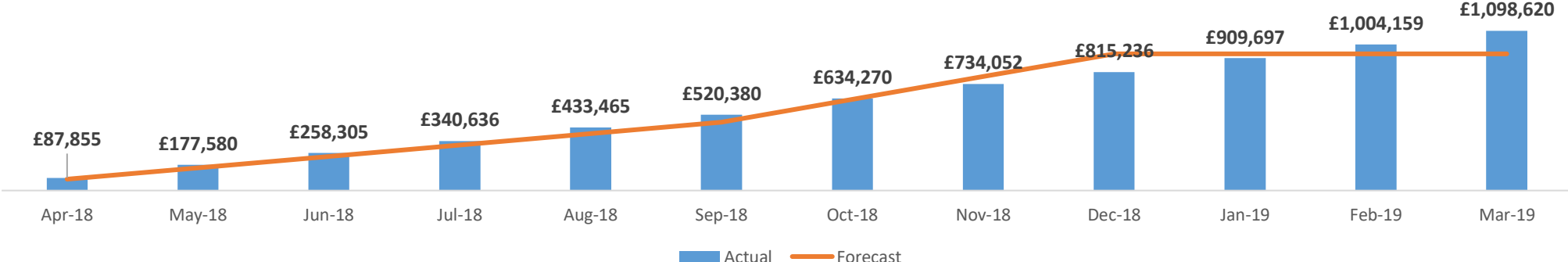
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Value of CT/HB overpayments recovered	£9,627,000	£2,328,465	£2,612,238	£2,448,228	£2,240,723	£9,629,654	£10,750,000	Red	<p><b>Comment:</b> <i>In House Enforcement/ASH</i> – The delay to implementation of the single view debt recovery system and the in-house enforcement function has prevented the referral of cases for additional recovery cycles.</p> <p><i>External Legal Referral</i> – The delay in procurement of a new external litigator resulted in the cessation of referrals to DWF; a number of cases were not referred for further actions such as High Court enforcement.</p> <p><i>Universal Credit</i> – The implementation of Universal Credit has impacted recovery from some claimants whose circumstances resulted in migration away from HB entitlement.</p> <p><b>Action:</b> Liaison with the enforcement manager and system developers to assist with implementation of system and overcome issues delaying In House Enforcement instigation . Continued dialogue with internal Legal to agree SLA between functions and identification of new external litigator enabling further recovery. Evaluation of existing caseload to identify volumes affected and dialogue with neighbouring boroughs to identify appropriate recovery methods</p>																																							
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BRENT 2020 - RAISING INCOME

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Value of Council Tax arrears recovered	£2,257,602	£613,760	£747,765	£577,445	£458,814	£2,397,784	£3,100,000	Red	<p><b>Comment:</b> Recovery focused on in year due to contractual arrangements, but still exceeded that achieved in 2017/18.</p> <p><b>Action:</b> To improve in 2019/20 when service returns to in house delivery.</p>																																							
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Revenue income secured from commercial portfolio	£2,403,000	£243,971	£460,212	£549,518	£1,165,879	£2,419,581	£2,403,000	Green	<p><b>Comment:</b> Income generated has exceeded it's target and the 2017/18 outturn by over £16k.</p>																			
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Registration and Nationality external income achieved to date	£973,680	£258,305	£262,075	£294,856	£283,384	£1,098,620	£940,000	Green	<p><b>Comment:</b> With the cessation of discretionary services offered in partnership with the Home Office we have utilised all staff and offered several extra diaries to generate income whilst the opportunity was there. In addition, there was a delay of the business partner setting up the front end service for the Home Office, we therefore had three extra months of income stream available to us which we monopolised upon. We also made a small surplus with the Barnet contract of which was shared 50/50 totalling £15k. Income Generation is uppermost with staff and we have all contributed to making the service profitable.</p>																																							
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BRENT 2020 - RAISING INCOME

KPI ID:	2017/18 OUTTURN	Q1 18/19	Q2 18/19	Q3 18/19	Q4 18/19	ACTUAL YTD	TARGET YTD	RAG	COMMENTS AND ACTIONS	
Income generated by Building Control	£61,589	£380,750	£375,751	£346,748	£284,541	£1,387,789	£1,414,087	Amber	<div>Additional income generated by Building Control</div> <div><div><div><div>£57,917</div><div>Apr-18</div></div><div><div>£134,833</div><div>May-18</div></div><div><div>£380,750</div><div>Jun-18</div></div><div><div>£554,667</div><div>Jul-18</div></div><div><div>£672,584</div><div>Aug-18</div></div><div><div>£756,500</div><div>Sep-18</div></div><div><div>£1,017,416</div><div>Oct-18</div></div><div><div>£1,051,332</div><div>Nov-18</div></div><div><div>£1,103,248</div><div>Dec-18</div></div><div><div>£1,198,095</div><div>Jan-19</div></div><div><div>£1,292,942</div><div>Feb-19</div></div><div><div>£1,387,789</div><div>Mar-19</div></div></div><div><div>Actual</div><div>Forecast</div></div><div><b>Comment:</b> Building control showed a small underspend, largely due to a vacant post and a staff member turning part time in the year.</div></div>	
LEAD MEMBER: Cllr Tatler										
STRATEGIC DIRECTOR: Amar Dave										
GOOD IS: Bigger is better										
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### Making sure that our children and young people have access to the best education and training, achieve to their potential and have the best start in life

#### Schools and Education

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Commentary and Actions	Owner	Lead Member
No. of CYP applying for Yr 7, 8, 9, 10 & 11 (ages 11-16) not offered a school place w/in 4 wks	6	0	0	0	0	0	0	Smaller is Better	Green	-	<b>Comment:</b> In 2018/19 all applications have been offered a school place within 4 weeks.	Gail Tolley	CLlr Agha
Percentage of pupils attending Brent schools that are judged as being either good or outstanding	96%	96.0%	95.0%	95.0%	93.0%	93.0%	100%	Bigger is Better	Red	-	<b>Comment:</b> There have been five inspection reports published in Q4. Kingsbury Green Primary School, Sinai Jewish Primary School, Capital City Academy and Fryent Primary School were all judged Good. Lyon Park Primary School was inspected in January and its overall effectiveness was judged as Requires Improvement. The school's leadership and management were judged good and the report highlighted the improvements that the school had made, although there were still some inconsistencies in the quality of teaching. As Lyon Park is a large four form entry school, this has reduced the overall percentage.	Gail Tolley	CLlr Agha

### Supporting vulnerable people and families when they need it

#### Children's Social Care

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Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Commentary and Actions	Owner	Lead Member
Rate of child and family assessments per 10,000 children	New for 2018/19	141.8	282.5	389.6	501.9	501.9	650.0	Smaller is Better	Green	-	<b>Comment:</b> There has been a significant reduction in the rate of child and family assessments completed this year compared to the same period last year. This is a reflection of greater screening activity being carried out at the Family Front Door.	Gail Tolley	CLlr Patel
Percentage of S47s completed which led to Initial Child Protection Conference	New for 2018/19	25.2%	26.6%	27.3%	28.2%	28.2%	20%	Bigger is Better	Green	-	<b>Comment:</b> The steadily improving figure has been driven by the initiation of fewer s47 investigations. Service intention is to target a continued rise in the conversion rate during 19/20.	Gail Tolley	CLlr Patel
Rate per 10,000 children subject of a Child Protection plan	New for 2018/19	44.80	46.5	40.6	38.4	38.4	43	Smaller is Better	Green	-	<b>Comment:</b> This figure is a reduction from last year's rate and is below the rate of statistical neighbours. Regular audit activity and challenge from Child Protection Advisors will ensure this indicator is closely monitored.	Gail Tolley	CLlr Patel
Rate of Looked After Children (per 10,000 of population)	New for 2018/19	40.8	38.2	38.9	38.7	38.7	42	Smaller is Better	Green	-	<b>Comment:</b> The LAC population has continued to remain stable during 18/19.	Gail Tolley	CLlr Patel
Stability of placements of Looked After Children: 3 or more placement moves (%)	14.7%	14.1%	14.5%	11.9%	13.0%	13.0%	11%	Smaller is Better	Amber	-	<b>Comment:</b> The outturn is an improvement on 17/18 but above target. The relatively low LAC population and a high number of older young people with complex needs impacts upon this indicator.	Gail Tolley	CLlr Patel
Number of looked after children with a Permanent Exclusion	New for 2018/19	0	0	0	0	0	0	Smaller is Better	Green	-	<b>Comment:</b> Partnership work with schools has ensured that the permanent exclusion figure has remained at 0.	Gail Tolley	CLlr Patel

## Supporting vulnerable people and families when they need it

## Children's Social Care continued

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Commentary and Actions	Owner	Lead Member
Number of looked after children with a Fixed Term Exclusion	New for 2018/19	20	3	14	13	23	25 (Annual target)	Smaller is Better	Green	-	<b>Comment:</b> Continue close liaison, advice and support to schools ensures that exclusion rates have remained low.	Gail Tolley	Cllr Patel
Percentage of looked after children school attendance	New for 2018/19	87%	89%	86%	88.0%	86.8%	90%	Bigger is Better	Amber	-	<b>Comment:</b> Attendance monitoring guidance has been issued to ensure that carers and schools are promoting the attendance of LAC. Attendance is in line with the previous year. Robust monitoring of attendance through Welfare Call has allowed any concerns to be addressed as soon as possible.	Gail Tolley	Cllr Patel
Percentage of social workers on a permanent contract	68.3%	72.1%	71.2%	71.1%	74.0%	74.0%	75%	Bigger is Better	Amber	-	<b>Comment:</b> A number of actions are in place to support permanent recruitment and retention of social work qualified staff and is resulting in a gradual strengthening of the performance indicator. These actions include incentive packages for hard to recruit to posts, a career progression framework to support retention of staff and the recruitment of up to 15 social workers from overseas to fill hard to recruit to roles.	Gail Tolley	Cllr Patel
EHCPs maintained	New for 2018/19	2,148	2,016	2,102	2,173	2,173	2,240	Bigger is Better	Amber	-	<b>Comment:</b> This contextual indicator demonstrates the trajectory of increased numbers of EHCPs. The projection is that this will continue to rise in 19/20.	Gail Tolley	Cllr Patel
Percentage of EHCPs issued in 20 weeks (including exceptions)	New for 2018/19	82%	94%	86%	90%	90%	90%	Bigger is Better	Green	-	<b>Comment:</b> The total number of EHCPs issued within 20 weeks met the target for 18/19, achieved through the timely completion of assessments and contributions of partner agencies.	Gail Tolley	Cllr Patel

## Supporting vulnerable people and families when they need it

## Adult Social Care

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Commentary and Actions	Owner	Lead Member
Percentage of adults using services who receive self-directed support	98.0%	99.00%	99.0%	97.5%	96.9%	96.9%	95.0%	Bigger is Better	Green	-	<b>Comment:</b> The target for this indicator has been met: All Community based clients were informed of their personal budgets with the exception of small numbers (i.e. Certain mental health clients). Please note, this figure is not static and changes over the course of the year.	Phil Porter	Cllr Farah
Percentage of adults using services who receive a direct payment in the community	23.16%	23.00%	23.60%	23.40%	23.30%	23.30%	24.0%	Bigger is Better	Amber	-	<b>Comment:</b> The Council has brought the DP management back in-house, allowing for better monitoring of DP services and a better and easier service for users. We will continue to monitor the situation closely and are hopeful that the take up of Direct Payments will increase over time.	Phil Porter	Cllr Farah

Enabling people to live healthier lives and reducing health inequalities

Public Health

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Commentary and Actions	Owner	Lead Member
Successful completions as a proportion of all opiate drug users in treatment	10.25%	11.85%	11.18%	9.59%	9.3% (Feb 2019)	Data not yet available	6.04% (national average)	Bigger is Better	TBC	-	<b>Comment:</b> Performance has dipped slightly as expected following the change in lead provider. However close contract management has ensured this dip remains small and performance is still well above national average	Phil Porter	CLlr Hirani
Waiting times - % of clients waiting to start first intervention (referrals seen within 3 weeks)	99.3%	100% (Q4)	100% (Q1)	Data not yet available	Data not yet available	Data not yet available	95%	Bigger is Better	TBC	-	<b>Comment:</b> The service operates a 24 hour helpline and no clients have had to wait to start treatment in 18/19	Phil Porter	CLlr Hirani
% of residents that complete a health check as a proportion of those offered	79.0%	52%	0%	16%	66%	50.0%	45% (national average)	Bigger is Better	Green	-	<b>Comment:</b> National average % uptake is 45%. In 2018/19 the contract with GPs was revised with a view to improving the targeting of invites.	Phil Porter	CLlr Hirani
PH14 Percentage of new birth visits within 14 days	93.0%	96%	97%	96.9%	Data not yet available	Data not yet available	95%	Bigger is Better	TBC	-	<b>Comment:</b> The marked improvement in performance since the re-procurement of this service has been maintained through close contract management	Phil Porter	CLlr Hirani
PH13 Mothers receiving antenatal visit	New for 2018/19	1,269	1,064	2,321	Data not yet available	Data not yet available	2,500	Bigger is Better	TBC	-	<b>Comment:</b> There has been a marked increase in performance by the provider. However the target has not yet been reached and this will continue to be focused upon in contract management.	Phil Porter	CLlr Hirani

## Making sure that Brent is an attractive place to live with a pleasant, sustainable environment, clean streets and well-cared for parks and green spaces

## Public Realm and Highways

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Commentary and Actions	Owner	Lead Member
Residual waste disposal tonnage - Public Realm Contract Target 1	67,413	17,780	16,860	16,642	16,075	67,357	65,985	Smaller is Better	Amber	-	<p><b>Comment:</b> The above target waste tonnages reflect nationwide trends as well as continued property growth within the borough. However, the full year tonnage is slightly lower than 2017/18 levels despite 2% annual property growth.</p> <p><b>Action:</b> The cost for disposal of tonnage in excess of the contract target is met by the Public Realm contractor Veolia so waste minimisation remains a key driver for them. Following a joint project with West London Waste Authority in 2017/18, which aimed to increase diversion of food waste from the residual waste stream, the Council rolled out stickers on residual waste bins in a small area. A new communications strategy is being developed by Veolia which will include expanding this project and will be implemented from April 2019.</p>	Amar Dave	Cllr Sheth
Household recyclables collected sent for re-use, recycling and composting	37%	39%	38%	38%	35%	38%	45%	Bigger is Better	Red	-	<p><b>Comment:</b> The Brent recycling rate has increased from the same period last year, meaning progress is being made.</p> <p><b>Action:</b> There is no contractual target for recycling and the Council continues to hold Veolia to account on the waste disposal tonnage target. Recycling services will continue to be promoted by Veolia's engagement team.</p>	Amar Dave	Cllr Sheth
Number of waste cases investigated which lead to enforcement action	694	879	615	445	371	2,310	-	Contextual		-	<p><b>Comment:</b> Waste crime continues to be a significant problem in Brent, as it is in many urban areas nationwide. Despite concerted enforcement and education activity, problems persist. The YTD outturn shows a significant increase compared to the same period in 2017/18, which is very positive performance.</p> <p><b>Action:</b> The restructured Environmental Enforcement team is now in place and up to full strength, with neighbourhood based Enforcement Officers progressing work on targeting specific ongoing issues. This is also the focus of the illegal waste dumping project.</p>	Amar Dave	Cllr Sheth
Number of kilograms of residual household waste collected per household	483	125	117	114	111	476	360	Smaller is Better	Red	-	<p><b>Comment:</b> Waste disposal is reducing per household as overall waste disposal is similar to last year's level despite 2% property growth.</p> <p><b>Action:</b> Reducing residual waste is a core contract target for Veolia. We continue to work with our partners and educate residents to bring down waste levels, refreshing and redoubling our efforts to focus on our reduce and reuse priorities, including rolling out the food waste diversion project.</p>	Amar Dave	Cllr Sheth
Missed bins per 100,000 collections	14.7	16.7	23.8	12.0	13.1	16.4	20	Smaller is Better	Green	-	<p><b>Comment:</b> High numbers of assisted collections and turnover of collection crew staff at our contractor, put pressure on the levels of missed collections recorded. A change of collections manager has led to temporary disruption.</p> <p><b>Action:</b> Discussions with Veolia have led to modifications to vehicles to fix a technical issue and improved efforts of collection crews leading to an improvement on this measure in recent months, bringing the YTD figure within target.</p>	Amar Dave	Cllr Sheth
Percentage of Cat 1 defects repaired on time (Emergency call-outs: response time to make highways/footways safe within 24hrs)	98%	93%	93%	100%	100%	97%	98%	Bigger is Better	Amber	-	<p><b>Comment:</b> Whereas the target was not met in May June and July , otherwise and since, the performance has been uniformly at 100%. The overall figure then is slightly down (1%) on the annual target due to the underperformance in the early months</p>	Amar Dave	Cllr Tatler

## Making sure that Brent is an attractive place to live with a pleasant, sustainable environment, clean streets and well-cared for parks and green spaces

### Public Realm and Highways

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Commentary and Actions	Owner	Lead Member
Percentage of Cat 2 defects repaired on time (Non-emergency repairs: response time to make highways/footways safe within 7-28 days)	44%	35%	63%	70%	28%	51%	98%	Bigger is Better	Red	-	<p><b>Comment:</b> The PI measures the performance of the LoHAC contractor, and the calculation includes defects not completed the month before and still not completed. So the "in month" performance for February and March was better than the figures reported ( it was around 80%) but has been dragged down by a historical backlog of defects not logged on Symology as completed. The contractor updated Symology in the first week of April and is now fully up to date. During this quarter we engaged two other contractors to assist with reactive repairs and this helped Conway catch up.</p> <p><b>Action:</b> Recognising that the LoHAC contractor was struggling with resources to keep up with the workload, arrangements were made to engage two other contractors . These contractors were issued with the new defect repairs while the LoHAC contractor worked their way through the backlog and caught up , having brought in extra resources. We will continue to monitor the LoHAC contractor to check that the work now remains on track.</p>	Amar Dave	Cllr Tatler
Parking driver compliance: PCNs issued: Parking contraventions	112,265	31,914	26,838	29,619	30,140	118,511	121,037	Contextual		-	<p><b>Comment:</b> Expansion of parking enforcement delayed to October pending CEO recruitment.</p> <p><b>Action:</b> 2019/2020 will see full year implementation of additional enforcement.</p>	Amar Dave	Cllr Sheth
Parking driver compliance: PCNs issued: CCTV bus lane	12,058	2,708	2,964	2,845	2,451	10,968	12,000	Contextual		-	<p><b>Comment:</b> Increased compliance by motorists with bus lane restrictions.</p>	Amar Dave	Cllr Sheth
Parking driver compliance: PCNs issued: CCTV moving traffic	66,414	15,666	15,208	16,506	15,507	62,887	68,262	Contextual		-	<p><b>Comment:</b> (1) PCN issuance disrupted June-September when IT system changed. (2) IT cable issue affected weight enforcement.</p> <p><b>Action:</b> (1) System transfer complete. Ten additional cameras are being installed. (2) Weight enforcement has re-commenced.</p>	Amar Dave	Cllr Sheth
Parking revenue: Car parks / Off street P&D	£567,587	£147,832	£141,077	£152,344	£144,085	£585,338	£533,946	Bigger is Better	Green	-	<p><b>Comment:</b> Increased use of car parks. All car parks now hold the ParkMark accreditation.</p>	Amar Dave	Cllr Sheth
SSL 01 - % of street lighting working as planned	99.91%	99.92%	99.89%	98.83%	98.17%	99.21%	99.95%	Bigger is Better	Amber	-	<p><b>Comment:</b> From October, rounded figures extracted from Urban Control IT system.</p>	Amar Dave	Cllr Sheth

## Increase the supply of affordable, good quality housing

### Housing Supply and Provision

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Commentary and Actions	Owner	Lead Member
Total number of approaches to the Housing Needs service by families and single households	3,521	1,134	1,306	1,474	1,521	5,435	-	Contextual		-	<p><b>Comment:</b> 15% of total applications year to date have been assessed through the dedicated Customer Portal and found to be not homeless or not eligible and offered advice and signposting. Approach numbers show a 54% increase compared to 2017/18.</p>	Phil Porter	Cllr Southwood



## Increase the supply of affordable, good quality housing

## Housing Supply and Provision

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Commentary and Actions	Owner	Lead Member
% of properties with a valid gas certificate	99.40%	100%	99.89%	99.97%	99.40%	99.40%	100%	Bigger is Better	Amber	-	<b>Comment:</b> A number of properties were missed out in Q4 due to a system error with the gas database. This was picked up and has been addressed.	Phil Porter	Cllr Southwood
% of properties with a valid Fire Risk Assessment, in line with cyclical date for re-inspection.	New for 2018/19	100%	100%	100%	100%	100%	100%	Bigger is Better	Green	-	<b>Comment:</b> Fire risk continues to be a main area of focus for the service. Appropriate resources are deployed to ensure the Council is not left exposed.	Phil Porter	Cllr Southwood
Fire Risk Assessment - Recommended Actions for Blocks over 6 Storeys high	New for 2018/19	100%	100%	100%	-	100%	100%	Bigger is Better	Green	-		Phil Porter	Cllr Southwood
% of repairs completed within an average of 14 calendar days	New for 2018/19	81%	79%	77%	82%	79%	80%	Bigger is Better	Amber	-	<b>Comment:</b> Improvements have been made in q4 achieving 82% with a target of 80%. There have been improvements made since Wates and Brent's Customer Experience Team have been able to make more appointments within 4 days of a repair being issued. This change was a direct result of the Integrated Asset Management workshops with Wates and Brent Council, where we agreed to open more routine repair slots as long as we reduce the number of emergency jobs raised weekly. We have seen improvements since applying the new ways of working and this can be linked to the increase in customer satisfaction noted in Q4.	Phil Porter	Cllr Southwood
Average re-let time for properties with minor voids works (calendar days)	57	51.1	32.4	31.0	30.8	37.0	24	Smaller is Better	Red	-	<b>Comment:</b> Although performance has fallen short of where we would have liked it to be, there has been an improvement of 20 days on last year. It is important to note that over 100 void properties, which were not on BHP records and had therefore been left empty for a long time, were let during this period.	Phil Porter	Cllr Southwood
Average re-let time for properties with major voids works (calendar days)	83	133.3	71.7	60.7	86.3	89.5	76	Smaller is Better	Red	-		Phil Porter	Cllr Southwood
% of housing customers satisfied with the repairs service received.	71%	75.60%	75.80%	75.30%	80.00%	77.00%	82%	Bigger is Better	Amber	-	<b>Comment:</b> In Q4 there was an increase in customer satisfaction from 75% reported in Q3 to 80% reported in Q4 (+4.7%), we are also showing a 6% increase compared to 2017/18 outturn of 71%. Following the Integrated Asset Management workshops with Wates and Brent Council, concentrated effort in Q4 to initiate changes in processes are beginning to show improvement in satisfaction results.	Phil Porter	Cllr Southwood
Current rent collected as a % of rent due	99.60%	98.1%	98.0%	99.7%	98.7%	98.6%	99.5%	Bigger is Better	Red	-	<b>Comment:</b> The roll out of Universal credit continues to be a challenge in income collection, with an average of 100 new Universal Credit claims per month since the full service began in November 2018. A number of activities are currently ongoing and others in planning, to mitigate the impact of UC on rent collections.	Phil Porter	Cllr Southwood

## Increase the supply of affordable, good quality housing

## Housing Supply and Provision

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Commentary and Actions	Owner	Lead Member
% calls answered in 3 minutes (housing management)	New for 2018/19	72.30%	53.50%	71.70%	64.10%	65.40%	80%	Bigger is Better	Red	-	<p><b>Comment:</b> Telephony answer rates have improved over the year and show a 7% improvement on performance from 2017/18. Call answering time has also improved with 11% more calls answered within 3 minutes in 2018/19 compared to 2017/18. The average wait time for a telephone call in the contact centre in 2018/19 was 4 minutes 49 seconds.</p> <p>After improvement in Q3 the impact of phasing in new systems and hardware in the team caused slippage in Q4. New laptops were allocated to the team, alongside the new repairs appointment booking system rollout and changes in CRM stretched staff capacity at an already difficult time as winter sees heavier call volumes and higher sickness rates.</p> <p><b>Action:</b> The team are working on embedding and refining their processes in line with new software and hardware. They are also aiming to carry out an Erlang resource volume analysis to ensure working patterns in the team align with current demand.</p>	Phil Porter	Cllr Southwood
Private Rented Sector dwellings improved through action taken by Private Housing Services	New for 2018/19	309	325	290	243	1,167	1,000	Bigger is Better	Green	-	<p><b>Comment:</b> In addition to target being exceeded, 44 Landlords or Agents have been issued Civil Penalty Notices generating an income of £235,000 in enforcement related activity this year.</p>	Phil Porter	Cllr Southwood
Number of Houses of Multiple Occupation Licenced within the Borough.	New for 2018/19	2,872	2,867	3,066	3,401	3,401	3,500	Bigger is Better	Amber	-	<p><b>Comment:</b> The licensing of HMOs is still challenging although we only under achieved on this year's target by 99 (3%) licenced HMOs.</p>	Phil Porter	Cllr Southwood
Number of selectively licensed properties	New for 2018/19	4,542	5,867	6,702	8,124	8,124	6,000	Bigger is Better	Green	-	<p><b>Comment:</b> This year we introduced Selective Licensing in five more wards and we have seen a fantastic take up of applications in those areas. We have modelled that 100% coverage in the 8 wards would equal 8500 so to achieve 8,124 in year 1 is very good.</p>	Phil Porter	Cllr Southwood
Affordable Rented Units delivered by 14B	128	27	22	21	15	85	-	Contextual		-	<p><b>Comment:</b> Overall stock total is 214 properties with 85 bought this financial year. This equates to approximately 750 people who were homeless being housed.</p>	Phil Porter	Cllr Southwood
Affordable Rented Units delivered by Brent/Registered Providers/Private Developers.	New for 2018/19	33	46	109	45	233	-	Contextual		-	<p><b>Comment:</b> 233 new affordable rented units have been delivered this year alongside a further 195 shared ownership units. Delays to some sites have meant lower numbers delivered than scheduled and these will now be completed in the new financial year. 45 new homes are due to be delivered directly by Brent in 2019, in addition to the 27 already delivered. Registered providers are also due to deliver 61 new affordable rented homes in 2019.</p>	Phil Porter	Cllr Southwood



## Ensuring good quality, accessible arts and leisure facilities

## Sports and Culture

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Commentary and Actions	Owner	Lead Member
The overall number of wet and dry visits to Brent's sports centres	1,720,147	447,143	444,540	429,790	450,368	1,771,841	1,739,076	Bigger is Better	Green	-	<b>Comment:</b> The three centres have performed well this year. The centres overall achieved 3% increase in usage compared to the previous year despite the fall in usage at Bridge Park CLC due to its uncertain future which affected the customers base. <b>Action:</b> Due to the national falling trend in swimming both centres are working on action plans to stave this off locally.	Phil Porter	CLlr Hirani
Number of active borrowers	36,421	35,359	35,176	35,136	35,592	35,592	36,421	Bigger is Better	Amber	-	<b>Comment:</b> The target was significantly impacted by 34 days of closure at Willesden Green due to flooding, and the slow recovery to bring customers back into the centre. The associated research and engagement plan for this PI also underwent review after the creation of the PII team and is now running as a more in depth research project to yield longer term gains over two years. Some increases did come at a local level, particularly borrowers on the e-library which continues to grow month on month. For 19/20 phases two and three of the insight and improvement project are due to conclude in June and Dec respectively. This will enable us to understand the behavioural patterns and motivations for users becoming active or inactive which will inform an evidence based action plan. However, due to the national and regional declining trend in active borrowing Brent has the 9th highest number of active borrowers in London out of 29 reporting authorities, increasing to 6th highest in Outer London. <b>Action:</b> Continuation of the research project will enable us to understand the behavioural patterns and motivations for users becoming active or inactive which will inform an evidence based action plan. The new system is now fully implemented so there should be no further disruption to supply.	Phil Porter	CLlr Hirani
Participation in the Cultural Offer at Library at Willesden Green	56,641	16,637	11,651	14,394	10,759	51,241	45,700	Bigger is Better	Green	-	<b>Comment:</b> This indicator was affected through the year by the period of 34 days closure at the site due to flooding. Due to the timing, this disruption also had a negative impact on Summer Reading Challenge participation on site. However the team worked hard to recover attendance and engagement, supported by a number of high profile and successful programmes in the centre including the Windrush anniversary events and the exhibition delivered in partnership with The Kiln. An increase in the number of school engagements over the second half of the year also helped.	Phil Porter	CLlr Hirani
Number of online interactions	2,391,177	710,889	880,341	767,321	624,525	2,983,026	3,200,000	Bigger is Better	Red	-	<b>Comment:</b> This was impacted by changes in the Brent website which lowered the positioning of the culture webpages, as well as changes in the Facebook algorithm which prioritise paid for content. The target was also high based on the position at the start of the year whereby the service was more heavily involved in London Borough of Culture online engagements though this was subsequently moved over to the new team. The transfer to the new Library Management System also caused some downtime and disruption to the online public catalogue. There have been some areas of improvement including use of the e-resource platforms and the marketing strategy for the service has increasingly moved to prioritise quality over quantity, using online engagement to drive live use of the libraries, beyond solely growing the online platforms.	Phil Porter	CLlr Hirani

Building community resilience and promoting citizenship

Partnership Working

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Commentary and Actions	Owner	Lead Member
Number of people attending Brent Connects forums	552	147	142	153	83	525	-	Contextual		-	<b>Comment:</b> Only 3 of the 5 Brent Connects meeting had taken place at the time of reporting so the final figure will be much higher.	Peter Gadsdon	Cllr Hirani
Number of people registered as volunteer	881	129	175	193	166	633	750	Bigger is Better	Red	-	<b>Comment:</b> Due to the closure of the Volunteering Brent service, the agreed focus for Q4 was the sustainability of Volunteering Involving Organisations to keep hosting volunteers following the closure of the programme. All volunteer registrations submitted to Volunteering Brent were processed and outreach/volunteer drop ins maintained throughout the period, to ensure those interested in volunteering could explore opportunities via our database.	Peter Gadsdon	Cllr Hirani
Income to benefit the borough secured by local voluntary groups, with CVS support	£375,000	£40,000	£86,225	£128,000	£101,200	£355,425	£480,000	Bigger is Better	Red	-	<b>Comment:</b> Despite appointing a new part-time development manager to focus on this, CVS Brent have not been able to achieve their target. Their focus on supporting smaller organisations and on external grant applications is yet to bear fruit. This is disappointing, however there are several applications waiting for news on the outcome so it is hoped that the benefits of the work they have done will be realised in Q1 of next year. <b>Action:</b> This has been highlighted as an issue that needs to be addressed with the CVS CEO and she has acknowledged the failing in this area and the need to improve quickly. It will be the key focus of monitoring meetings going forward.	Peter Gadsdon	Cllr Hirani
Number of local voluntary sector groups receiving 1-2-1 advice and guidance from CVS	146	61	41	47	57	206	165	Bigger is Better	Green	-	<b>Comment:</b> The results here are largely due to the implementation of a more systematic and robust monitoring approach.	Peter Gadsdon	Cllr Hirani

Working with partners to find new ways or providing services that are more finely tailored to individual, community and local needs

Internal Business

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Commentary and Actions	Owner	Lead Member
Average customer waiting time in local offices (mins)	27.0	18.4	17.3	16.3	13.0	16.25	20	Smaller is Better	Green	-	<b>Comment:</b> Waiting times continue to improve month on month with the new way of working which includes an improved triage process and the ability for customers to upload documents to the IEG form after they have submitted applications. <b>Action:</b> The Customer Service Review project is reviewing services to establish where we can automate to ensure seamless customer journeys. The digital provision is also intended to support the capture and integration of customer data which will inform and shape service delivery and improvements. In addition, we are seeking to install self-service scanners to enable customers to upload their own documents within the CSC.	Peter Gadsdon	Cllr Southwood

## Working with partners to find new ways or providing services that are more finely tailored to individual, community and local needs

## Internal Business

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Commentary and Actions	Owner	Lead Member
Average days taken to process new benefit claims and change events	8.31	14.21	15.56	18.00	7.09	11.32	8.7	Smaller is Better	Red	-	<p><b>Comment:</b> Right Time performance has improved since the backlog of assessments work has been completed during Q2 and Q3 during 2018/19. Our end of year position achieved 11.32 days for combined changes and new claims which is much better than the 14.5 days previously forecast in the backlog plan. Q4 shows performance of 7.09 days which is within the target set (and would represent top quartile performance if maintained for the year). A number of steps are in place to better manage the work ensuring that this is regularly tracked and monitored and actions required taken more promptly to maintain the incoming work within 10 working days in line with the Council's Customer Promise.</p> <p><b>Action:</b> The steps we are taking to better manage the work include: regular monitoring the incoming and outstanding work position, performance monitoring of all teams, prioritisation of work to ensure all work types kept within the 10 working days. In addition to this Robotics is being launched in April 2019 on low level work types initially rent changes which will free up capacity to deal with more complex work types. We are also instigating more rigorous governance arrangements on our offsite resilience contract, to improve further the satisfactory performance to date.</p>	Peter Gadsdon	Cllr Southwood
Percentage of telephone calls answered by BCS	78.20%	67.56% (June only)	66.75%	77.16%	80.29%	71.33%	80%	Bigger is Better	Red	-	<p><b>Comment:</b> The average % of calls answered across BCS this quarter was up 3% to 80% as compared to the last quarter. Performance has been steadily improving and the actions taken to increase answer rates has been effective.</p> <p>Housing Benefit call volumes continue to increase. January is usually a very busy month, however the number of calls answered also increased by 12% in March as compared to January. Although year end generates increased demand, we are aware that failure demand is partly the cause for increased call volumes. Some of the reasons identified are customers not understanding letters being sent out, system errors occurring which are being investigated and some assessment errors being made. Performance for council tax phones improved again in March. Capita implemented a plan which is showing results and continues to be actioned.</p> <p><b>Action:</b> There are four particular areas of focus for BCS where we will continue to target improved answer rates – Housing Benefit, Blue Badges &amp; Local Welfare Assistance, Nationality and Registration and Council Tax.</p> <p>A Rapid Improvement Team has been set up to focus on the failure demand causes and resolution. This work will commence 8/4/19 and we expect to see call volumes reducing in Q1 19/20. With the Council Tax service returning to in house delivery from 1 May actions are being taken to ensure there is no disruption experienced for customers</p>	Peter Gadsdon	Cllr Southwood

Working with partners to find new ways or providing services that are more finely tailored to individual, community and local needs

Internal Business

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Commentary and Actions	Owner	Lead Member
Percentage of telephone calls answered through the council's ACD system	78.18%	78% (June only)	75.00%	76.04%	80.34%	77.2%	80%	Bigger is Better	Amber	-	<b>Comment:</b> Overall performance is improving and for the past two months the target of 80% and above has been achieved. The objective now is to ensure that targets are met consistently. <b>Action:</b> Departments will continue to receive monthly reports outlining their performance and the Chief Executive will continue to receive monthly reports that highlight departmental hotspots in order to drive up performance.	Peter Gadsdon	Cllr Southwood
Percentages of invoices paid on time	81.7%	80.1%	78.7%	83.0%	63.7%	77.9%	80%	Bigger is Better	Amber	-	<b>Comment:</b> Late receipting of PO numbers, insufficient funds on PO numbers, and staff not completing their supplier invoice reconciliations on Oracle is adding to the late payment of invoices. <b>Action:</b> Improved communication in chasing staff to check for their invoices on Oracle, and to make sure that PO numbers are raised accurately and receipted on time.	Peter Gadsdon	Cllr Southwood
Number of deaths registered within 5 days (excluding those referred to the Coroner) (%)	84.7%	81.7%	82.7%	89.3%	89.0%	86.0%	90%	Bigger is Better	Amber	-	<b>Comment:</b> Although, we did not reach target of 90% we were however one of the top performing for our region. Brent were the 4th highest volume of deaths for the London region. The lower percentage was due to the cold spell in April 2018 which saw a 26% rise in Brent which is 95 more deaths in one month. The impact is a week and half of extra officer time. What helps us to achieve the target is a seven day operation as families have five days to register the death. We now have a good liaison with the bereavement teams at our hospitals covered by Brent and they advise if higher number of deaths so that we can adjust our diaries to accommodate the higher numbers.	Peter Gadsdon	Cllr Miller
Percentage of stage 1 complaints responded to within timescale (Corporate)	93%	92%	94%	94%	94%	94%	100%	Bigger is Better	Red	-	<b>Comment:</b> Stage 1 Complaint responses remained fairly constant throughout 2018/19. There was a slight dip in Q2 where 92% of responses were completed in time, however the YTD figure of 94% completed on time (1,558 cases) is 1% point above the previous year's outturn.	Peter Gadsdon	Cllr McLennan
Percentage of stage 1 complaints responded to within timescale (Statutory)	88%	84%	95%	97%	89%	91%	100%	Bigger is Better	Red	-	<b>Comment:</b> There was an 8% point reduction in Q4 for stage 1 statutory performance compared to the previous quarter despite the same number of cases due (35). Actual YTD for 18/19 is 91% which is 3% points higher than the previous year (145 out of 159 cases closed on time).	Peter Gadsdon	Cllr McLennan
Percentage of stage 2 complaints responded to within timescale (Corporate)	85%	82%	79%	96%	88%	87%	100%	Bigger is Better	Red	-	<b>Comment:</b> The percentage of stage 2 corporate complaints responded to in time has fluctuated over the course of 18/19. Performance was strong in the second half of 18/19 with 96% on time in Q3 and 88% in Q4. This contributed to the overall rate of 87% on time in 18/19, which was 2% points higher than the outturn for the previous year.	Peter Gadsdon	Cllr McLennan
Percentage of stage 2 complaints responded to within timescale (Statutory)	61%	33%	100%	36%	71%	50%	100%	Bigger is Better	Red	-	<b>Comment:</b> The total number of stage 2 statutory cases is low. In Q4 5 out of 7 cases were closed on time (71%). The overall rate of 50% on time for the year was based on 13 out of 26 statutory cases closed on time (11% point decrease from 17/18 outturn). Improving the timeliness of stage 2 statutory children's complaints remains a challenge. The volume of these cases are low but the nature of the cases are typically complex. There is ongoing tracking of stage 2 complaints by the CYP senior management and corporate complaints team to help improve the timeliness rate of these cases.	Peter Gadsdon	Cllr McLennan

## Working with partners to find new ways or providing services that are more finely tailored to individual, community and local needs

## Internal Business continued

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Commentary and Actions	Owner	Lead Member
Total number of stage 1 complaints upheld / partially upheld	558	205	234	218	195	852	-	Contextual		-	<b>Comment:</b> The total number of complaints upheld has significantly increased in comparison to the previous year. From 558 in 17/18 to 852 in 18/19, an increase of 53%. The main reason for this increase is that complaints casework for the Housing Management Service (HMS), which was brought in house in October 2017 is now included in council figures. There has also been an increase in the level of Stage 1 complaints received in 18/19.	Peter Gadsdon	Cllr McLennan
Total number of stage 1 complaints not upheld	530	172	164	162	151	649	-	Contextual		-	<b>Comment:</b> The overall number of stage 1 complaints not upheld increased from 530 in 17/18 to 649 in 18/19, an increase of 22%. As stated above, this also reflects the inclusion of HMS casework	Peter Gadsdon	Cllr McLennan
Total number of decisions made by the ombudsman on complaints investigated	67	30	12	12	22	76	-	Contextual		-	<b>Comment:</b> The total number of decisions made by the ombudsmen on complaints investigated increased by 9 cases compared to the previous year. In total there were 76 decisions made by the ombudsmen on complaints investigated in 18/19.	Peter Gadsdon	Cllr McLennan
Total number of complaints upheld by the ombudsman	19	9	4	3	7	23	-	Contextual		-	<b>Comment:</b> There were 23 cases which were upheld by the ombudsmen in 18/19, which is 4 cases more than in 17/18. Out of the 76 decisions made by the ombudsmen in 18/19, 30% of cases were upheld.	Peter Gadsdon	Cllr McLennan
Percentage of FOI responded to within 20 working days	95%	91%	90%	93%	93%	92%	90%	Bigger is Better	Green	-	<b>Comment:</b> Q4 performance has remained the same as Q3 with 93% of FOIs responded to on time. The performance during the year has gradually increased, however the overall performance of 92% is 3% points lower than 17/18 outturn. It should be noted that the total number of FOIs received in 18/19 increased by 162 cases which is a 9% increase on last year.	Peter Gadsdon	Cllr McLennan
Percentage of members enquiries responded to within 10 days	95%	96%	97%	97%	97%	97%	100%	Bigger is Better	Amber	-	<b>Comment:</b> Member enquiry performance continues to remain strong despite quarterly increase in volumes. The 18/19 YTD figure of 97% (6,487) cases closed in time was 2% points higher than the 17/18 outrun of 95% (4,050), despite 2,437 more enquiries being closed (an increase of 60%).	Peter Gadsdon	Cllr Butt
Percentage of Subject Access Requests (SARs) responded to within the statutory timescales	91%	83%	88%	81%	93%	85%	95%	Bigger is Better	Red	-	<b>Comment:</b> At the start of Q2, the statutory timescale to comply with SARs was reduced from 40 days to a calendar month. This together with an increase in requests led to a dip in performance, which was addressed by improved training and temporary resources. <b>Action:</b> SARs to be implemented onto CRM, this will streamline the admin process. SAR tracker created- to ensure data from SA is received within the correct timeframe.	Peter Gadsdon	Cllr McLennan
Average days sickness (Previous 12 months)	5.87	5.71	5.82	5.79	6.11	6.11	-	Contextual		-	Awaiting commentary from department.	Carolyn Downs	Cllr McLennan



## Building A Better Brent - Strong Foundations

## Partnership Working

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Brent 2020 Priority	Owner	Lead Member
Number of people attending Brent Connects forums	552	147	142	153	83	525	-	Contextual		-	Better Local	Peter Gadsdon	Cllr Hirani
Number of people registered as volunteer	881	129	175	193	166	633	750	Bigger is Better	Red	-	Better Local	Peter Gadsdon	Cllr Hirani
Income to benefit the borough secured by local voluntary groups, with CVS support	£375,000	£40,000	£86,225	£128,000	£101,200	£355,425	£480,000	Bigger is Better	Red	-	Better Local	Peter Gadsdon	Cllr Hirani
Number of local voluntary sector groups receiving 1-2-1 advice and guidance from CVS	146	61	41	47	57	206	165	Bigger is Better	Green	-	Better Local	Peter Gadsdon	Cllr Hirani
Non-Domestic Business Rates (NNDR)	98.57%	46.17%	54.62%	83.88%	99.02%	99.02%	98.74%	Bigger is Better	Green	-	Brent 2020 - Raising Income	Peter Gadsdon	Cllr Southwood
Percentage of Council Tax collected	95.60%	30.58%	56.83%	82.90%	96.08%	96.08%	96.50%	Bigger is Better	Amber	-	Brent 2020 - Raising Income	Peter Gadsdon	Cllr Southwood
Value of Council Tax arrears recovered	£2,257,602	£613,760	£747,765	£577,445	£458,814	£2,397,784	£3,100,000	Bigger is Better	Red		Brent 2020 - Raising Income	Peter Gadsdon	Cllr Southwood
Revenue income secured from commercial portfolio	£2,403,000	£243,971	£460,212	£549,518	£1,165,879	£2,419,581	£2,403,000	Bigger is Better	Green		Brent 2020 - Raising Income	Amar Dave	Cllr McLennan
Income generated by Building Control	£61,589	£380,750	£375,751	£346,748	£284,541	£1,387,789	£1,414,087	Bigger is Better	Amber		Brent 2020 - Raising Income	Peter Gadsdon	Cllr Tatler

## Internal Business

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Brent 2020 Priority	Owner	Lead Member
Value of CT/HB overpayments recovered	£9,627,000	£2,328,465	£2,612,238	£2,448,228	£2,240,723	£9,629,654	£10,750,000	Bigger is Better	Red		Brent 2020 - Raising Income	Peter Gadsdon	Cllr Southwood
Registration and Nationality external income achieved to date	£973,680	£258,305	£262,075	£294,856	£283,384	£1,098,620	£940,000	Bigger is Better	Green		Brent 2020 - Raising Income	Peter Gadsdon	Cllr Miller
Average customer waiting time in local offices (mins)	27.0	18.4	17.3	16.3	13.0	16.25	20	Smaller is Better	Green	-	Better Local	Peter Gadsdon	Cllr Southwood
Percentages of invoices paid on time	81.7%	80.1%	78.7%	83.0%	63.7%	77.9%	80%	Bigger is Better	Amber	-	Better Local	Peter Gadsdon	Cllr Southwood
Number of deaths registered within 5 days (excluding those referred to the Coroner) (%)	84.7%	81.7%	82.7%	89.3%	89.0%	86.0%	90%	Bigger is Better	Amber	-	Better Local	Peter Gadsdon	Cllr Miller

## Building A Better Brent - Strong Foundations

## Internal Business

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Brent 2020 Priority	Owner	Lead Member
Average days taken to process new benefit claims and change events	8.31	14.21	15.56	18.00	7.09	11.32	8.7	Smaller is Better	Red	-	Better Local	Peter Gadsdon	Cllr Southwood
Percentage of telephone calls answered by BCS	78.20%	67.56% (June only)	66.75%	77.16%	80.29%	71.33%	80%	Bigger is Better	Red	-	Better Local	Peter Gadsdon	Cllr Southwood
Percentage of telephone calls answered through the council's ACD system	78.18%	78% (June only)	75.00%	76.04%	80.34%	77.2%	80%	Bigger is Better	Amber	-	Better Local	Peter Gadsdon	Cllr Southwood
Percentage of stage 1 complaints responded to within timescale (Corporate)	93%	94%	92%	94%	94%	94%	100%	Bigger is Better	Red	-	Better Local	Peter Gadsdon	Cllr McLennan
Percentage of stage 1 complaints responded to within timescale (Statutory)	88%	84%	95%	97%	89%	91%	100%	Bigger is Better	Red	-	Better Local	Peter Gadsdon	Cllr McLennan
Percentage of stage 2 complaints responded to within timescale (Corporate)	85%	82%	79%	96%	88%	87%	100%	Bigger is Better	Red	-	Better Local	Peter Gadsdon	Cllr McLennan
Percentage of stage 2 complaints responded to within timescale (Statutory)	61%	33%	100%	36%	71%	50%	100%	Bigger is Better	Red	-	Better Local	Peter Gadsdon	Cllr McLennan
Total number of stage 1 complaints upheld / partially upheld	558	205	234	218	195	852	-	Contextual		-	Better Local	Peter Gadsdon	Cllr McLennan
Total number of stage 1 complaints not upheld	530	172	164	162	151	649	-	Contextual		-	Better Local	Peter Gadsdon	Cllr McLennan
Total number of decisions made by the ombudsman on complaints investigated	67	30	12	12	22	76	-	Contextual		-	Better Local	Peter Gadsdon	Cllr McLennan
Total number of complaints upheld by the ombudsman	19	9	4	3	7	23	-	Contextual		-	Better Local	Peter Gadsdon	Cllr McLennan
Percentage of FOI responded to within 20 working days	95%	91%	90%	93%	93%	92%	90%	Bigger is Better	Green	-	Better Local	Peter Gadsdon	Cllr McLennan
Percentage of members enquiries responded to within 10 days	95%	96%	97%	97%	97%	97%	100%	Bigger is Better	Amber	-	Better Local	Peter Gadsdon	Cllr Butt
Percentage of Subject Access Requests (SARs) responded to within the statutory timescales	91%	83%	88%	81%	93%	85%	95%	Bigger is Better	Red	-	Better Local	Peter Gadsdon	Cllr McLennan
Average days sickness (Previous 12 months)	5.87	5.71	5.82	5.79	6.11	6.11	-	Contextual		-	Better Local	Carolyn Downs	Cllr McLennan

## Building A Better Brent - Every Opportunity To Succeed

## Schools

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Brent 2020 Priority	Owner	Lead Member
No. of CYP applying for Yr 7, 8, 9, 10 & 11 (ages 11-16) not offered a school place w/in 4 wks	6	0	0	0	0	0	0	Smaller is Better	Green	-	Better Lives	Gail Tolley	ClIr Agha
Percentage of pupils attending Brent schools that are judged as being either good or outstanding	96%	96.0%	95.0%	95.0%	93.0%	93.0%	100%	Bigger is Better	Red	-	Better Lives	Gail Tolley	ClIr Agha

## Children's Social Care

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Brent 2020 Priority	Owner	Lead Member
Rate of child and family assessments per 10,000 children	New for 2018/19	141.8	282.5	389.6	501.9	501.9	650.0	Smaller is Better	Green	-	Better Lives	Gail Tolley	ClIr Patel
Percentage of S47s completed which led to Initial Child Protection Conference	New for 2018/19	25.2%	26.6%	27.3%	28.2%	28.2%	20%	Bigger is Better	Green	-	Better Lives	Gail Tolley	ClIr Patel
Rate per 10,000 children subject of a Child Protection plan	New for 2018/19	44.80	46.5	40.6	38.4	38.4	43	Smaller is Better	Green	-	Better Lives	Gail Tolley	ClIr Patel
Rate of Looked After Children (per 10,000 of population)	New for 2018/19	40.8	38.2	38.9	38.7	38.7	42	Smaller is Better	Green	-	Better Lives	Gail Tolley	ClIr Patel
Stability of placements of Looked After Children: 3 or more placement moves (%)	14.7%	14.1%	14.5%	11.9%	13.0%	13.0%	11%	Smaller is Better	Amber	-	Better Lives	Gail Tolley	ClIr Patel
Number of looked after children with a Permanent Exclusion	New for 2018/19	0	0	0	0	0	0	Smaller is Better	Green	-	Better Lives	Gail Tolley	ClIr Patel
Number of looked after children with a Fixed Term Exclusion	New for 2018/19	20	3	14	13	23	25 (Annual target)	Smaller is Better	Green	-	Better Lives	Gail Tolley	ClIr Patel
Percentage of looked after children school attendance	New for 2018/19	87%	89%	86%	88%	86.8%	90%	Bigger is Better	Amber	-	Better Lives	Gail Tolley	ClIr Patel
Percentage of social workers on a permanent contract	68.3%	72.1%	71.2%	71.1%	74.0%	74.0%	75%	Bigger is Better	Amber	-	Better Lives	Gail Tolley	ClIr Patel
EHCPs maintained	New for 2018/19	2,148	2,016	2,102	2,173	2,173	2,240	Bigger is Better	Amber	-	Better Lives	Gail Tolley	ClIr Patel
Percentage of EHCPs issued in 20 weeks (including exceptions)	New for 2018/19	82%	94%	86%	90%	90%	90%	Bigger is Better	Green	-	Better Lives	Gail Tolley	ClIr Patel



## Building A Better Brent - Every Opportunity To Succeed

## Children's Social Care

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Brent 2020 Priority	Owner	Lead Member
Average days between a child entering care and moving in with his/her adoptive family, for those adopted	379	358	355	349	387	387	426	Smaller is Better	Green	-	Brent 2020 - Demand Management	Gail Tolley	Cllr Patel
Percentage of Looked After Children placed with foster carers	68.70%	66.67%	68.90%	63.58%	64.00%	64.00%	70.00%	Bigger is Better	Red	-	Brent 2020 - Demand Management	Gail Tolley	Cllr Patel

## Education, Employment &amp; Skills

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Brent 2020 Priority	Owner	Lead Member
Percentage of academic age 16-17 year olds who are not in education, employment or training (NEET)	2%	1.5%	0.8%	1.7%	1.4%	1.4%	2%	Smaller is Better	Green	-	Brent 2020 - Employment And Skills	Gail Tolley	Cllr Agha
Percentage of care leavers (19 -21 year olds) in education, employment or training (EET)	51%	49.2%	47.5%	46%	55%	55%	52%	Bigger is Better	Green	-	Brent 2020 - Employment And Skills	Gail Tolley	Cllr Agha
Brent Starts Achievement Rate (now referred to by Education and Skills Funding Agency (ESFA) as Pass Rate)	93%	95.3%	94.9%	95.4%	96.0%	96.0%	95%	Bigger is Better	Green	-	Brent 2020 - Employment And Skills	Amar Dave	Cllr Agha
Priority Areas - The Living Room (TLR) - Employment Outcomes	40	14	40	40	37	131	45	Bigger is Better	Green	-	Brent 2020 - Employment And Skills	Amar Dave	Cllr Agha
Brent Works - Job Outcomes	86	36	27	28	24	115	100	Bigger is Better	Green	-	Brent 2020 - Employment And Skills	Amar Dave	Cllr Agha
Brent Works - Apprenticeship Outcomes	40	27	16	6	7	56	50	Bigger is Better	Green	-	Brent 2020 - Employment And Skills	Amar Dave	Cllr Agha

## Building A Better Brent - A Future Built For Everyone, An Economy Fit For All

### Public Realm and Highways

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Brent 2020 Priority	Owner	Lead Member
Percentage of Cat 1 defects repaired on time (Emergency call-outs: response time to make highways/footways safe within 24hrs)	98%	93%	93%	100%	100%	97%	98%	Bigger is Better	Amber	-	Better Place	Amar Dave	Cllr Tatler
Percentage of Cat 2 defects repaired on time (Non-emergency repairs: response time to make highways/footways safe within 7-28 days)	44%	35%	63%	70%	28%	51%	98%	Bigger is Better	Red	-	Better Place	Amar Dave	Cllr Tatler

### Housing Supply and Provision

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Brent 2020 Priority	Owner	Lead Member
Total number of approaches to the Housing Needs service by families and single households	3,521	1,134	1,306	1,474	1,521	5,435	-	Contextual		-	Better Place	Phil Porter	Cllr Southwood
% of properties with a valid gas certificate	99.40%	100%	99.89%	99.97%	99.40%	99.40%	100%	Bigger is Better	Amber	-	Better Place	Phil Porter	Cllr Southwood
% of properties with a valid Fire Risk Assessment, in line with cyclical date for re-inspection.	New for 2018/19	100%	100%	100%	100%	100%	100%	Bigger is Better	Green	-	Better Place	Phil Porter	Cllr Southwood
Fire Risk Assessment - Recommended Actions for Blocks over 6 Storeys high	New for 2018/19	100%	100%	100%	-	100%	100%	Bigger is Better	Green	-	Better Place	Phil Porter	Cllr Southwood
% of repairs completed within an average of 14 calendar days	New for 2018/19	81%	79%	77%	82%	79%	80%	Bigger is Better	Amber	-	Better Place	Phil Porter	Cllr Southwood
Average re-let time for properties with minor voids works (calendar days)	57	51.1	32.4	31.0	30.8	37.0	24	Smaller is Better	Red	-	Better Place	Phil Porter	Cllr Southwood
Average re-let time for properties with major voids works (calendar days)	83	133.3	71.7	60.7	86.3	89.5	76	Smaller is Better	Red	-	Better Place	Phil Porter	Cllr Southwood
% calls answered in 3 minutes (housing management)	New for 2018/19	72.30%	53.50%	71.70%	64.10%	65.40%	80%	Bigger is Better	Red	-	Better Place	Phil Porter	Cllr Southwood
Private Rented Sector dwellings improved through action taken by Private Housing Services	New for 2018/19	309	325	290	243	1,167	1,000	Bigger is Better	Green	-	Better Place	Phil Porter	Cllr Southwood

## Building A Better Brent - A Future Built For Everyone, An Economy Fit For All

## Housing Supply and Provision

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Brent 2020 Priority	Owner	Lead Member
Number of Houses of Multiple Occupation Licenced within the Borough.	New for 2018/19	2,872	2,867	3,066	3,401	3,401	3,500	Bigger is Better	Amber	-	Better Place	Phil Porter	Cllr Southwood
Number of selectively licensed properties	New for 2018/19	4,542	5,867	6,702	8,124	8,124	6,000	Bigger is Better	Green	-	Better Place	Phil Porter	Cllr Southwood
Affordable Rented Units delivered by 14B	128	27	22	21	15	85	-	Contextual		-	Better Place	Phil Porter	Cllr Southwood
Affordable Rented Units delivered by Brent/Registered Providers/Private Developers.	New for 2018/19	33	46	109	45	233	-	Contextual		-	Better Place	Phil Porter	Cllr Southwood
Number of Empty properties refurbished and brought back into use within the Borough	50	20	28	50	21	119	50	Bigger is Better	Green	-	Brent 2020 - Business And Housing Growth	Phil Porter	Cllr Southwood
Number of households (families & singles) in temporary accommodation (TA)	2,450	2,342	2,331	2,384	2,191	2,191	2,775	Smaller is better	Green		Brent 2020 - Demand Management	Phil Porter	Cllr Southwood
Number of households in non-self-contained Bed and Breakfast (B&B)	51	66	77	94	121	121	30	Smaller is better	Red		Brent 2020 - Demand Management	Phil Porter	Cllr Southwood
Percentage of households to whom the Council owes a main housing duty (previously reported as a number)	493 (number)	44%	43%	45%	59%	55%	50%	Smaller is better	Amber		Brent 2020 - Demand Management	Phil Porter	Cllr Southwood
Percentage of Homelessness prevented and relieved (previously reported as a number)	599 (number)	47%	55%	62%	67%	57%	50%	Bigger is Better	Green		Brent 2020 - Demand Management	Phil Porter	Cllr Southwood
% of housing customers satisfied with the repairs service received.	71%	75.60%	75.80%	75.30%	80.00%	77.00%	82%	Bigger is Better	Amber	-	Better Place	Phil Porter	Cllr Southwood
Current rent collected as a % of rent due	99.60%	98.1%	98.0%	99.7%	98.7%	98.6%	99.5%	Bigger is Better	Red	-	Better Place	Phil Porter	Cllr Southwood

Building A Better Brent - A Future Built For Everyone, An Economy Fit For All

Planning

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Brent 2020 Priority	Owner	Lead Member
Percentage of major applications determined in 13 weeks or other formally agreed time over rolling two year period	85.7%	89.0%	94.2%	95.4%	96.0%	96.7%	82.0%	Bigger is Better	Green	-	Brent 2020 - Regeneration	Amar Dave	Cllr Tatler
Percentage of non majors (minors and others) applications determined in 8 weeks or other formally agreed time over rolling two year	78.0%	84.5%	87.5%	90.3%	90.0%	89.5%	76.0%	Bigger is Better	Green	-	Brent 2020 - Regeneration	Amar Dave	Cllr Tatler

## Building A Better Brent - A Cleaner, More Considerate Brent

## Public Realm and Highways

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Brent 2020 Priority	Owner	Lead Member
Number of illegally dumped waste incidents reported on public land (large and small)	18,526	6,428	6,300	6,847	7,142	26,717	-	Contextual		-	Brent 2020 - Regeneration	Amar Dave	Cllr Sheth
Average time taken to remove illegally dumped waste (days)	0.68	0.50	0.47	0.46	0.43	0.47	1.00	Smaller is Better	Green	-	Brent 2020 - Regeneration	Amar Dave	Cllr Sheth
Residual waste disposal tonnage - Public Realm Contract Target 1	67,413	17,780	16,860	16,642	16,075	67,357	65,985	Smaller is Better	Amber	-	Better Place	Amar Dave	Cllr Sheth
Household recyclables collected sent for re-use, recycling and composting	37%	39%	38%	38%	35%	38%	45%	Bigger is Better	Red	-	Better Place	Amar Dave	Cllr Sheth
Number of waste cases investigated which lead to enforcement action	694	879	615	445	371	2,310	-	Contextual		-	Better Place	Amar Dave	Cllr Sheth
Number of kilograms of residual household waste collected per household	483	125	117	114	111	476	360	Smaller is Better	Red	-	Better Place	Amar Dave	Cllr Sheth
Missed bins per 100,000 collections	14.7	16.7	23.8	12.0	13.1	16.4	20	Smaller is Better	Green	-	Better Place	Amar Dave	Cllr Sheth
Parking driver compliance: PCNs issued: Parking contraventions	112,265	31,914	26,838	29,619	30,140	118,511	121,037	Contextual		-	Better Place	Amar Dave	Cllr Sheth
Parking driver compliance: PCNs issued: CCTV bus lane	12,058	2,708	2,964	2,845	2,451	10,968	12,000	Contextual		-	Better Place	Amar Dave	Cllr Sheth
Parking driver compliance: PCNs issued: CCTV moving traffic	66,414	15,666	15,208	16,506	15,507	62,887	68,262	Contextual		-	Better Place	Amar Dave	Cllr Sheth
Parking revenue: Car parks / Off street P&D	£567,587	£147,832	£141,077	£152,344	£144,085	£585,338	£533,946	Bigger is Better	Green	-	Better Place	Amar Dave	Cllr Sheth

## Building A Better Brent - A Borough Where We Can All Feel Safe, Secure, Happy And Healthy

### Early Help (Youth Offending)

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Brent 2020 Priority	Owner	Lead Member
Reoffending rate by young offenders per cohort	47.8%	44.0%	53.0%	54.0%	50.0%	50.0%	48.1%	Smaller is Better	Amber	-	Brent 2020 - Regeneration	Gail Tolley	Cllr Patel
First time entrants to the Youth Justice System aged 10-17 per cohort	129	123	114	99	90	90	123	Smaller is Better	Green	-	Brent 2020 - Regeneration	Gail Tolley	Cllr Patel

### Adult Social Care

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Brent 2020 Priority	Owner	Lead Member
New admissions to residential & nursing care homes, 18-64 (cumulative)	28	6	6	6	8	8	14	Smaller is Better	Green	-	Brent 2020 - Demand Management	Phil Porter	Cllr Farah
New admissions to residential & nursing care homes, 65+ (cumulative)	149	38	55	72	84	84	111	Smaller is Better	Green	-	Brent 2020 - Demand Management	Phil Porter	Cllr Farah
The outcome of short-term services: sequel to service (REABLEMENT)	78.0%	82.6%	76.6%	87.4%	82.5%	76.6%	75.0%	Bigger is Better	Green	-	Brent 2020 - Demand Management	Phil Porter	Cllr Farah
Average monthly acute delayed transfers of care (DToc) attributable to ASC	3.20	4.95	4.46	4.60	3.20	3.60	6.50	Smaller is Better	Green	-	Brent 2020 - Demand Management	Phil Porter	Cllr Farah
Percentage of adults using services who receive self-directed support	98.0%	99.00%	99.0%	97.5%	96.9%	96.9%	95.0%	Bigger is Better	Green	-	Better Lives	Phil Porter	Cllr Farah
Percentage of adults using services who receive a direct payment in the community	23.16%	23.00%	23.60%	23.40%	23.30%	23.30%	24.0%	Bigger is Better	Amber	-	Better Lives	Phil Porter	Cllr Farah

### Public Health

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Brent 2020 Priority	Owner	Lead Member
Successful completions as a proportion of all opiate drug users in treatment	10.25%	11.85%	11.18%	9.59%	9.3% (Feb 2019)	Data not yet available	6.04% (national average)	Bigger is Better	TBC	-	Better Lives	Phil Porter	Cllr Hirani
Waiting times - % of clients waiting to start first intervention (referrals seen within 3 weeks)	99.3%	100% (Q4)	100% (Q1)	Data not yet available	Data not yet available	Data not yet available	95%	Bigger is Better	TBC	-	Better Lives	Phil Porter	Cllr Hirani
% of residents that complete a health check as a proportion of those offered	79.0%	52%	0%	16%	66%	50.0%	45% (national average)	Bigger is Better	Green	-	Better Lives	Phil Porter	Cllr Hirani

## Building A Better Brent - A Borough Where We Can All Feel Safe, Secure, Happy And Healthy

### Public Health

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Brent 2020 Priority	Owner	Lead Member
PH14 Percentage of new birth visits within 14 days	93.0%	96%	97%	96.9%	Data not yet available	Data not yet available	95%	Bigger is Better	TBC	-	Better Lives	Phil Porter	Cllr Hirani
PH13 Mothers receiving antenatal visit	New for 2018/19	1,269	1,064	2,321	Data not yet available	Data not yet available	2,500	Bigger is Better	TBC	-	Better Lives	Phil Porter	Cllr Hirani

### Public Realm and Highways

Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Brent 2020 Priority	Owner	Lead Member
SSL 01 - % of street lighting working as planned	99.91%	99.92%	99.89%	98.83%	98.17%	99.21%	99.95%	Bigger is Better	Amber	-	Better Place	Amar Dave	Cllr Sheth

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Performance Indicator	17/18 Outturn	Q1	Q2	Q3	Q4	Actual YTD	Target YTD	Good is?	RAG YTD	Benchmark (Source)	Brent 2020 Priority	Owner	Lead Member
Participation in the Cultural Offer at Library at Willesden Green	56,641	16,637	11,651	14,394	10,759	51,241	45,700	Bigger is Better	Green	-	Better Place	Phil Porter	Cllr Hirani
The overall number of wet and dry visits to Brent's sports centres	1,720,147	447,143	444,540	429,790	450,368	1,771,841	1,739,076	Bigger is Better	Green	-	Better Place	Phil Porter	Cllr Hirani
Number of active borrowers	36,421	35,359	35,176	35,136	35,592	35,592	36,421	Bigger is Better	Amber	-	Better Place	Phil Porter	Cllr Hirani
Number of online interactions	2,391,177	710,889	880,341	767,321	624,525	2,983,026	3,200,000	Bigger is Better	Red	-	Better Place	Phil Porter	Cllr Hirani

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