



## Cabinet

**Monday 8 April 2024 at 10.00 am**

Conference Hall - Brent Civic Centre, Engineers Way,  
Wembley, HA9 0FJ

Please note this will be held as a physical meeting which all Cabinet members will be required to attend in person.

**The meeting will be open for the press and public to attend or alternatively can be followed via the live webcast. The link to follow proceedings via the live webcast is available [HERE](#)**

### Membership:

#### Lead Member Councillors:

#### Portfolio

M.Butt (Chair)	Leader of the Council
M Patel (Vice-Chair)	Deputy Leader and Cabinet Member for Finance, Resources & Reform
Donnelly-Jackson	Cabinet Member for Customers, Communities & Culture
Farah	Cabinet Member for Safer Communities & Public Protection
Grahl	Cabinet Member for Children, Young People & Schools
Knight	Cabinet Member for Housing, Homelessness & Renters Security
Nerva	Cabinet Member for Public Health & Adult Social Care
Krupa Sheth	Cabinet Member for Environment, Infrastructure and Climate Action
Tatler	Cabinet Member for Regeneration, Planning & Growth

**For further information contact:** James Kinsella, Governance Manager, Tel: 020 8937 2063; Email: [james.kinsella@brent.gov.uk](mailto:james.kinsella@brent.gov.uk)

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### **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 - 10
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To approve the minutes of the previous Cabinet meeting held on Monday 11 March 2024 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 consider any petitions for which notice has been received, in accordance with Standing Order 66.

Members are asked to note that the following petitions are due to be presented at the meeting:

- Installation of Pelican Crossing between Kenton Road, Kenton Lane & Woodcock Hill.
- Traffic calming measures and traffic restrictions on Chamberlayne Road, Kensal Green, NW10.
- Academisation process Byron Court School.

<b>6</b>	<b>Reference of item considered by Scrutiny Committees (if any)</b>	
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To consider any reports referred by either the Community & Wellbeing or Resources & Public Realm Scrutiny Committees.

<b>Communities &amp; Regeneration reports</b>		
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<b>7</b>	<b>EDI Strategy 2024 - 2028</b>	11 - 48
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This report sets out the Council's new Equity, Diversity and Inclusion (EDI) ambitions for the next four years detailing development of the new ambitions and components that complement these ambitions, including the engagement findings report, Corporate Anti-Racism Action Plan, the UNISON Anti-Racism Charter and London Local Government Anti-Racism Statement. It also outlines next steps in relation to driving the Council's ambitions through the new EDI Board and establishing an EDI dashboard to monitor progress.

**Ward Affected:**  
All Wards

**Lead Member:** Cabinet Member for Customers, Communities and Culture (Councillor Fleur Donnelly-Jackson)

**Contact Officer:** Tom Pickup, Policy, Partnerships & Scrutiny Manager

Tel: 07553 724213

[tom.pickup@brent.gov.uk](mailto:tom.pickup@brent.gov.uk)

## **8 Sudbury Town Neighbourhood Forum Application for Neighbourhood Forum Status 49 - 88**

This report details the responses received to the consultation undertaken on an application for Sudbury Town Neighbourhood Forum status and requests that Cabinet consider designation of the Sudbury Town Neighbourhood Forum.

**Ward Affected:**  
Northwick Park;  
Sudbury;  
Wembley  
Central

**Lead Member:** Cabinet Member for Regeneration, Planning & Growth (Councillor Shama Tatler)

**Contact Officer:** Paul Lewin, Team Leader Planning Policy

Tel: 020 8937 6710

[paul.lewin@brent.gov.uk](mailto:paul.lewin@brent.gov.uk)

## **9 SCIL request for a new Publicly Accessible Courtyard and new Community Centre in Wembley 89 - 108**

This report seeks Cabinet approval for the allocation of Strategic Community Infrastructure Levy capital funding to deliver a new publicly accessible courtyard garden and new fully fitted out community centre, including a contribution towards lifetime maintenance costs, as part of the Council's Wembley Housing Zone regeneration.

**Ward Affected:**  
Wembley Hill

**Lead Member:** Cabinet Member for Regeneration, Planning & Growth (Councillor Shama Tatler)

**Contact Officer:** Jonathan Kay, Head of Regeneration

Tel: 020 8937 2348

[jonathan.kay@brent.gov.uk](mailto:jonathan.kay@brent.gov.uk)



**10 Award of 0-19 Public Health Contract (Health Visiting and School Nursing) 109 - 116**

This reports seeks Cabinet approval to the direct award of a contract in respect of Children's Public Health 0-19 years (Health Visiting and School Nursing) with Central London Community Health Care NHS Trust pursuant to the Provider Selection Regime.

**Ward Affected:**  
All Wards

**Lead Member:** Cabinet Member for Public Health & Adult Social Care (Councillor Neil Nerva)

**Contact Officer:** Marie McLoughlin, Public Health

Tel: 020 8937 6214

[Marie.McLoughlin@brent.gov.uk](mailto:Marie.McLoughlin@brent.gov.uk)

**11 Exclusion of Press and Public**

No items have been identified in advance of the meeting that will require the exclusion of the press or public.

**12 Any other urgent business**

Notice of items to be raised under this heading must be given in writing to the Head of Chief Executive & Member Services or their representative before the meeting in accordance with Standing Order 60.

**Date of the next meeting: Tuesday 28 May 2024**



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. Alternatively, it will be possible to follow proceedings via the live webcast [HERE](#)

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## LONDON BOROUGH OF BRENT

### MINUTES OF THE CABINET

Held in the Conference Hall, Brent Civic Centre on Monday 11 March 2024 at  
10.00 am

PRESENT: Councillor M.Butt (Chair), Councillor Mili Patel (Vice-Chair) and Councillors Donnelly-Jackson, Farah, Grahl, Knight, Nerva, Krupa Sheth and Tatler.

Also present: Andrew Hudson (Chair i4B Ltd and First Wave Housing Ltd).

#### 1. **Apologies for Absence**

Following her return from maternity leave, Councillor Muhammed Butt (Leader of Council) formally welcomed Councillor Mili Patel back in her role as Vice-Chair, Deputy Leader and Cabinet Member for Finance, Resources & Reform.

The opportunity was also taken to formally thank Councillor Tatler for her support in covering the role of Vice-Chair and Deputy Leader and Cabinet Member for Finance, Resources and Reform during Councillor Mili Patel's period of maternity leave.

No apologies for absence were received.

#### 2. **Declarations of Interest**

No declarations of interest were made during the meeting.

#### 3. **Minutes of the Previous Meeting**

Cabinet **RESOLVED** that the minutes of the previous meeting held on Monday 5 February 2024 be approved as a correct record.

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

None.

#### 5. **Petitions (if any)**

No petitions were submitted for consideration at the meeting.

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

There were no references from the Community & Wellbeing or Resources & Public Realm Scrutiny Committees submitted for consideration at the meeting.

#### 7. **i4B Holdings Ltd Business Plan 2024 - 25**

Prior to consideration of the report, Councillor Muhammed Butt (as Leader of the Council) welcomed Andrew Hudson (as newly appointed Chair of both the i4B Holdings Ltd and First Wave Housing Ltd Boards) to the meeting and invited him to introduce the key themes and strategic priorities within the 2024-25 Business Plans for both companies.

In presenting each Business Plans Andrew Hudson began by outlining the nature of the current challenges faced in relation to the performance of both companies as a housing service, which included rent collection during a cost-of-living crisis; building safety; pressure from disrepair claims as well as longer term issues such as working towards the achievement of net zero.

Focussing on priorities moving forward, he then highlighted the work being undertaken to tackle voids (including minor void performance), which included looking for best practice as well as further activity to streamline processes, as well as other housing management issues which had included the work being undertaken to establish closer links between staff and the areas they covered in order to develop a more holistic approach and relationship with tenants and the Board continuing to closely monitor levels of tenant satisfaction.

In terms of strategic challenges, he advised members that they key focus remained on seeking to maximise the Boards contribution to the Council's wider priorities, with a specific focus in supporting the work being undertaken to tackle the demand for housing given the increase in levels of homelessness. As part of this approach, the Board had identified workstreams over the coming year aimed at seeking to increase i4Bs level of stock (utilising the rise in Local Housing Allowance (LHA) rates and increased price cap supported by discussions with the Council on the potential draw down of further funding) with initial activity focussed around the acquisition of 3-4 bed houses in the North West of the borough above the North Circular Road and small blocks as well as supporting tenants to move through i4B. As an example, members were advised of the work already being undertaken with BEAM as a partner organisation to provide specific employment support alongside the focus in developing wider packages of support for tenants.

In thanking Andrew Hudson for his opening comments, the Leader then invited Councillor Tatler (in completing her cover as Deputy Leader and Cabinet Member for Finance, Resources & Reform) to introduce the report included on the agenda detailing the final draft of the i4B Holdings Ltd 2024-25 Business Plan for consideration and approval on behalf of the Shareholder. In presenting the report, Councillor Tatler advised that the Business Plan had been designed to set out i4Bs key priorities and strategy for the 2024-25 financial year in support of its key objectives.

In considering the report, Cabinet noted and welcomed the work being undertaken through the company to increase the supply of good quality affordable housing and support tenants, aligned with the Council's strategic objectives in terms of seeking to address homelessness and reduce reliance on more expensive Temporary Accommodation, with the Board thanked for their work and support in this respect. In noting the update provided within the report in relation to operational performance, Members welcomed the ongoing monitoring by the Board and focus in seeking to address the key operational issues identified in relation to voids and rent collection supported by the change in the Housing Management structure

along with the efforts being made to actively support and engage with those tenants (particularly those impacted by the overall benefit cap and cost-of-living crisis) on measures designed to support their financial resilience and improve income collection through the provision of targeted budgeting advice and specific employment support designed to provide a renewed focus on the process for letting properties whilst also seeking to sustain tenancies over the longer term.

In recognising the challenges outlined alongside current performance and welcoming the direction and approach adopted in relation to the strategic priorities identified by i4B, Cabinet **RESOLVED** having noted with the exempt information contained within the appendices of the report:

- (1) To approve the 2024-25 i4B Holdings Ltd Business Plan and financial model as Shareholder of the Company.
- (2) To approve the 2024-25 Service Level Agreement between i4B Holdings Ltd and the Council.

## **8. First Wave Housing Ltd (FWH) Business Plan 2024 - 25**

Councillor Tatler (in completing her cover as Deputy Leader and Cabinet Member for Finance, Resources & Reform) then moved on to introduce a report, providing Cabinet with the final draft of the First Wave Housing Ltd (FWH) 2024-25 Business Plan along with details of the revised Service Level Agreement with the Council for consideration and approval on behalf of the Guarantor.

In considering the report, Cabinet once again noted and welcomed the work being undertaken through the company to support the Council's strategic objectives in relation to the supply of safe, secure and sustainable affordable housing alongside the update provided within the report in relation to its operational performance including the focus on repairs and voids.

Having noted the introductory comments made by Andrew Hudson (as Chair of the i4B and First Wave Housing (FWH) Ltd Boards) under the previous item including the focus of FWH Ltd (working with the Council) in seeking to maximise opportunities identified through its status as a Registered Provider in contributing towards the supply of affordable housing across the borough, Cabinet **RESOLVED** having also noted the current performance and strategic priorities outlined in relation to FWH, along with the exempt information contained within the appendices of the report:

- (1) To approve the 2024-25 First Wave Housing Ltd Business Plan and financial model as Guarantor of the Company.
- (2) To approve the 2024-25 Service Level Agreement between First Wave Housing Ltd and the Council.

## **9. Future of Housing Repairs Service Update**

Councillor Knight (Cabinet Member for Housing, Homelessness and Renters Security) introduced a report providing an update on progress with the procurement

and implementation of the new housing repairs service, including relevant pre-tender considerations.

In considering the report Cabinet noted the work undertaken to develop proposals for future delivery of the repairs service following the decision taken in September 2023 to move to a new hybrid delivery model for the service. Members were reminded that the new model would include a framework of local contractors along with a handyperson service that would predominantly undertake communal repairs and where necessary provide a rapid response service. Given the need to provide sufficient time for design of the final contract specifications and mobilisation of the new service model, members were advised they were also being asked to consider a revised timetable for delivery of the programme which would include a six (plus six, if required) month extension to the current Wates contract as well as a six-month mobilisation period, as detailed within section 5.3 of the report.

Members welcomed the efforts being made to address concerns relating to current performance of the repairs service through the new model of service delivery along with the approach and support being provided to encourage involvement of local contractors in the procurement process as part of the wider community wealth building opportunities identified.

In thanking all those involved in development of the proposals and recognising the improvements being sought in terms of performance outcomes and resilience of the future repairs service Cabinet **RESOLVED**:

- (1) To approve an extension to the current housing repairs service contract with Wates, for a period of six months, with the possibility of extension for a further six months for the reasons set out in paragraphs 5.1 and 5.2 of the report.
- (2) To approve the outline pre-tender considerations set out in Section 6 of the report.
- (3) To approve the new timetable for future repairs delivery actions as set out at paragraph 5.3 of the report.
- (4) To approve the proposal that the final cost/quality split be agreed by the Corporate Director, Resident Services, in consultation with the Corporate Director, Finance and Resources.

#### 10. **Amendment to the Procurement of the Framework Agreement For Housing Refurbishment Works**

Following the update provided under Item 9 above on the Future of the Housing Repairs service, Councillor Knight (Cabinet Member for Housing, Homelessness and Renters Security) introduced a report detailing changes to the original procurement process proposed for the housing repairs and maintenance service.

In considering the report Cabinet noted that the amendments being sought were to an existing procurement framework required to support the move towards re-procurement of the new responsive housing repairs contract. Members also noted the way in which the amendments would support the ability to further develop and build capacity enabling local contractors to engage in the process, once again

seeking to place community wealth building at the heart of the repair service delivery.

In supporting the approach outlined, Cabinet **RESOLVED**:

- (1) To note the proposed amendments to the procurement of a framework agreement for Housing Refurbishment Works as set out in paragraph 4.4 of the report to include the increases of Lots from 6 to 16, the amendment to annual framework value and the extension of the framework term from four to ten years compared to that detailed in the Cabinet Report dated 12 October 2020 requesting Authority to Tender for Framework Agreements for Housing Refurbishment Works and Technical Consultancy Services.
- (2) To note that the amended framework for Housing Refurbishment Works will be available to call off by Council officers and contractors appointed in connection with replacement repairs, voids and planned maintenance works.
- (3) To approve inviting tenders for a framework agreement for Housing Refurbishment Works on the basis of the revised pre - tender considerations set out in paragraph 4.9 of the report.
- (4) To approves officers evaluating the tenders referred to in (3) above on the basis of the evaluation criteria set out in paragraph 4.9 of the report.
- (5) To approve reducing the number of Lots from seven to six for the framework agreement for Technical Consultancy Services as detailed in paragraph 4.1 of the report.
- (6) To approve the report in conjunction with the re-procurement of the repairs and maintenance service report (Item 9 above).

#### **11. Proposal to deliver 60 homes for Social Rent on the Chalk Hill Estate**

Councillor Knight (Cabinet Member for Housing, Homelessness and Renters Security) introduced a report detailing the potential for delivering new social housing through the redevelopment and regeneration of garages, parking areas and associated hard standing forming part of the Scientist Estate, Chalk hill owned and managed by Metropolitan Thames Valley Housing Association (MTVH).

In introducing the report Cabinet noted the opportunity outlined to work closely with MTVH as one of the Council's strategic housing provider partners to unlock 60 new social homes for residents through the repurposing of garage sites on the Chalk hill Estate. Highlighting the way in which development of the proposals reflected the approach being adopted towards strategic relationship and place building involving a range of housing providers, members were pleased to note that whilst the estate was wholly owned and managed by MTVH all of the new homes delivered as part of the scheme would be for social rent with the Council holding 100% nomination rights to under the initial lettings process with the scheme to be delivered by MTVH utilising the Council's statutory site assembly Compulsory Purchase powers.

In welcoming the initiative, members recognised the innovative nature of the scheme as a means of supporting the efforts being made to increase the supply of

affordable housing in order to address the ongoing housing crisis and long term needs of residents across the borough, with support also expressed for the new homes being provided at social rent and nomination rights available to the Council. In thanking all those involved for their efforts to bring forward the scheme, members advised they were also keen to continue the development of this type of approach, working collectively with strategic partners, in order to identify any further new build opportunities and to ensure all levers were being utilised to deliver the Council's strategic housing objectives including the ongoing review of statutory CPO and site assembly powers.

In support of the scheme, Cabinet therefore **RESOLVED**:

- (1) To approve in principle the Council working with Metropolitan Thames Valley Housing Association (MTVH) to support the development objective of delivering new social housing within the Chalk hill Estate.
- (2) To approve in principle to make Compulsory Purchase Orders of land interests within the Chalk hill Estate as identified on Plan 1 under Planning or Housing legislation to bring forward the development objectives, subject to a further specific resolution of Cabinet in respect of the making of each order.
- (3) To agree advancing the preliminary stages of the compulsory purchase process on the Chalk hill Estate, including, but not limited to, land referencing, issuing section 16 of the Local Government (Miscellaneous Provisions) Act 1976 notices (section 16 notices), engaging, consulting and negotiating with landowners, and preparation of documentation and undertake all matters that the Council might need to undertake to inform a further report to Cabinet to make, confirm and implement the CPO, if required.
- (4) To approve in principle to appropriate, subject to planning, the land identified on Plan 1 under section 203 of the 2016 Housing and Planning Act, subject to a further specific resolution of Cabinet in respect of the making of each appropriation.
- (5) To approve in principle to make stopping up orders using planning or highways legislation for any land identified on Plan 1 and comprising public highway.
- (6) To note the potential for the delivery of new social housing illustrated by MTVH's current design proposals and that the current proposal will be subject to further consultation, design refinement and following that be subject of an application for planning permission to the Local Planning Authority.
- (7) To delegate authority to the Corporate Director of Resident Services, in consultation with the Cabinet Member for Housing, Homelessness and Renters Security to enter into an indemnity agreement with MTVH to indemnify the Council for all costs associated with the compulsory purchase process on Chalk hill Estate.

## **12. Corporate Performance Report - Quarter 3 2023/24**



Councillor Muhammed Butt (as Leader of the Council) introduced a report, which provided Cabinet with an overview of corporate performance in the third quarter of 2023-24.

In presenting the report, the Leader advised that the performance monitoring update provided a detailed assessment against the full suite of Key Performance Indicators developed to monitor delivery of the desired outcomes and corporate priorities within the new Borough Plan 2023-2027.

In noting the performance monitoring updates and commentary provided within the report, members also recognised the actions being undertaken to address current performance in relation to those targets rated as “red”, particularly in relation to corporate priority “The Best Start in Life” relating to youth inspections of Council and commissioned services. Members noted this work had involved a number of activities designed to influence and help shape service delivery focussed around the engagement of care leavers and support for the care leavers covenant and compact. Members also welcomed the performance identified in relation to level of engagement with Family Wellbeing Centres (FWC), which had exceeded target, and was felt to reflect the success in promotion of the FWC offer across Brent in reaching new families and supporting their access to a range of key services. Members also commended the performance achieved in relation to the provision of access for residents to Community Hubs and the percentage of enquiries being resolved at point of contact (84%) recognising the importance in this provision and with all staff supporting provision of both the FWC and Community Hubs thanked for their ongoing efforts in seeking to ensure those families and residents in need were able to access the range of support available.

In recognising the efforts being made to ensure the continued delivery of services and work being undertaken jointly by Cabinet Members with their relevant Corporate Directors, in seeking to manage and mitigate against the financial challenges and strategic risks identified as part of the overall wider approach towards supporting local residents and in support of the priorities within the Borough Plan Cabinet **RESOLVED**:

- (1) To note the Borough Plan 2023-24 performance reporting for Q3 as set out in section 3 and Appendix A of the report.
- (2) To note the current and future strategic risks associated with the information provided and agree the remedial actions on strategic risks identified as appropriate alongside the challenge on progress being provided with responsible officers as necessary.

13. **Request for Strategic Community Infrastructure Levy (SCIL) Allocation for Three Projects**

Councillor Tatler (Cabinet Member for Regeneration, Planning & Growth) introduced a report seeking approval for use of Strategic Community Infrastructure Levy (SCIL) funding to support the delivery of three projects relating to Preston Community Library, the spine road within Northwick Park as part of the One Public Estate Development and a nursery development project at Grove Park Pavilion.

In considering the report, Cabinet noted the benefits identified in relation to the schemes at Preston Community Library and Grove Park Nursery given the impact they would have in the delivery of community facilities designed to enable local communities to lead on the development and management of activities within their area and in terms of the Northwick Park Spine Road as a key infrastructure project assisting to unlock growth in the area and also delivery additional community facilities and housing.

Members were also keen to recognise the positive impact being created through the use of SCIL as part of the wider programme of regeneration activity and its associated benefits for local communities across the borough with thanks expressed for the work being undertaken to deliver the ongoing programme of growth and regeneration across the borough given the benefits identified for both current and future residents.

In support of the wider benefits identified and ongoing commitment to create long lasting and positive change for local communities across the borough supported by the associated infrastructure Cabinet **RESOLVED**:

- (1) To approve the use of £600k of SCIL for the fit out of Preston Community Library.
- (2) To approve the use of up to £3m of SCIL for the completion of the spine road at Northwick Park as part of the One Public Estate development.
- (3) To approve the use of £500k of SCIL for the nursery development project at Grove Park Pavilion.

#### 14. **Provision of Microsoft Licences - for STS partner borough of Southwark**

Councillor Tatler (in completing her cover as Deputy Leader and Cabinet Member for Finance, Resources & Reform) introduced a report regarding the procurement of Microsoft Licences for the London Borough of Southwark as part a partner under the Shared Technology Service (STS) Agreement.

In considering the report Cabinet noted that under the STS Inter Authority Agreement Brent had been designated as the contracting authority for contracts procured for delivery of services to STS partners, which included Brent, Lewisham and Southwark. As a result, agreement was being sought for the procurement of a new contract for the provision of Microsoft Licences to Southwark following expiry of the current contract at the end of March 2024. Members noted that whilst the contract would be for the sole use of Southwark, it would also be expected to support the ongoing effective operation of the Shared Service as a whole.

Having noted the exempt information contained within the appendices of the report, Cabinet **RESOLVED** to approve the award of a contract for the provision of Microsoft Licences for the London Borough of Southwark to Bytes Software Services Limited for a term of three years in the estimated sum of £6,306,449.63.

#### 15. **Exclusion of Press and Public**

There were no items that required the exclusion of the press or public.


16. **Any other urgent business**

There were no items of urgent business.

The meeting ended at 10.30 am

COUNCILLOR MUHAMMED BUTT  
Chair

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	<b>Cabinet</b> 8 April 2024
	<b>Report from the Interim Corporate Director of Communities and Regeneration</b>
	<b>Lead Member – Cabinet Member for Customers, Communities &amp; Culture (Councillor Donnelly-Jackson)</b>

## Equity, Diversity and Inclusion Strategy 2024-28 including the Corporate Anti-Racism Action Plan

<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>List of Appendices:</b>	Four Appendix A: EDI Strategy 2024-28 Appendix B: Corporate Anti-Racism Action Plan Appendix C: EDI Strategy Engagement Findings Report Appendix D: EDI Strategy Equality Impact Assessment
<b>Background Papers:</b>	None
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	Tom Pickup, Policy, Partnerships and Scrutiny Manager 07553724213 <a href="mailto:tom.pickup@brent.gov.uk">tom.pickup@brent.gov.uk</a>  Angela Chaudhry, Strategy Lead – EDI <a href="mailto:angela.chaudhry@brent.gov.uk">angela.chaudhry@brent.gov.uk</a>  Kibibi Octave, Director, Communities 020 8937 4225 <a href="mailto:kibibi.octave@brent.gov.uk">kibibi.octave@brent.gov.uk</a>

### 1.0 Executive Summary

- 1.1. This report shares, for endorsement, our new Equity, Diversity and Inclusion (EDI) ambitions for the next four years. It describes the journey that has been

undertaken to frame our new ambitions and includes a series of accompanying products and components that complement and supplement our new ambitions, including the engagement findings report, Corporate Anti-Racism Action Plan, the UNISON Anti-Racism Charter and London Local Government Anti-Racism Statement. It also outlines next steps in relation to driving our ambitions through the new EDI Board and establishing an EDI dashboard to monitor our progress.

## **2.0 Recommendation(s)**

- 2.1. To endorse the EDI Strategy 2024-28 and Corporate Anti-Racism Action Plan (Appendix A and B).
- 2.2. To endorse signing up to the UNISON Anti-Racism Charter and London Council Anti-Racism Statement (see paragraph 3.2.15) as tools that will further complement our ambitions and commitment around anti-racism.

## **3.0 Detail**

### **3.1 Cabinet Member Foreword**

- 3.1.1. Brent's Equity, Diversity, and Inclusion Strategy 2024 – 2028 and accompanying plans demonstrate our commitment to tackle inequalities and support individuals and families to reach their full potential. It is at the heart of our vision to move Brent forward together and ensure no one is left behind. Through the engagement which underpins this Strategy, we have heard the ideas and suggestions from our communities on how to celebrate, engage and empower local people. By listening to these ideas, we recognise that it is through understanding and celebrating differences and working together that we, as individuals, organisations, and communities can thrive. That is why our new ambitions are centred around equity and inclusion. Our ambitions also help frame the future of the organisation – we are keen to go beyond diversity representation and foster an inclusive work environment where everyone, at every level of the organisation is curious to learn and improve the council culture. This will help create the best conditions where we can use our knowledge to serve our communities more effectively.

### **3.2 Contribution to Borough Plan Priorities & Strategic Context**

- 3.2.1. This report contributes to the delivery of every Borough Plan priority. The report shares the organisations new EDI Strategy 2024-28 and accompanying draft Anti-Racism Action Plan. Both products are central to our organisational approach and culture and therefore underpin everything we do.

### **3.3 Background**

#### **The Equity, Diversity and Inclusion Strategy 2024-28**

##### Developing the strategy

- 3.3.1. The process for developing the strategy began at the end of 2022 and our approach has been centred around engaging with and reflecting the voice of stakeholders. The engagement helped determine and frame the overarching focus of the strategy: 'inclusivity', which applies both to a community and organisational context. In its broadest sense, inclusion is about how well the contributions, presence and perspectives of different groups of people are valued and integrated into an environment.
- 3.3.2. Our methodology focused on targeted engagement with key stakeholders and supplementing the findings with the findings from the Borough Plan engagement exercise, which remains relevant and appropriate for the EDI Strategy. We engaged with the following groups:
- Brent staff – via Forward Together workshops
  - Brent staff network co-Chairs
  - Internal Domestic Abuse & Violence Against Women and Girls (VAWG) Delivery Group
  - Members Briefing Session
  - Deaf Parents Group
  - Brent Pensioners Forum
  - Brent Multi-Faith Forum
  - Middlesex Association for the Blind
  - Brent Disability Forum
  - Brent Youth Parliament
  - 3x open workshops in Wembley, Kingsbury and Stonebridge
- 3.3.3. The questions and style adopted for the sessions were tailored for the different audiences, but the themes explored remained the same across every session:
- Understanding and defining 'inclusion'
  - Community cohesion and togetherness across Brent
  - How well equity, diversity and inclusion are embedded, understood and experienced across the borough.
  - Specific issues, concerns and opportunities tailored to specific groups, based on the audience.
- 3.3.4. Appendix C is the EDI Strategy engagement findings report and provides additional details around the methodology and findings. In relation to the findings, the key themes include:
- External engagement – we engaged with stakeholders from different protected characteristics and interests, therefore most of the feedback was framed around their needs. However, some of the collective themes include:
    - The importance of accessibility and ensuring our systems, processes and infrastructure meet everyone's needs, specifically in relation to physical accessibility and written communications.

- Establishing greater cohesion across the borough by bringing people together through events and common themes.
- Engaging and working with seldom heard communities, in particular, to establish services and support that is tailored to their needs.
- Internal engagement – staff shared their high expectations and aspirations with the goal of Brent being leader around EDI. The questions asked centred around how the organisation can improve and reach this level of ambition:
  - ‘How can Brent become a more inclusive organisation?’. In response there were three overarching themes:
    1. Organisational Culture and Ways of Working – this focussed on collaborating with other areas and team building; having more opportunities to get to learn and empower staff in a safe and open environment, whilst acknowledging and celebrating success.
    2. Employee lifecycle – this included further learning about different cultures and protected characteristics; fairer, open and transparent recruitment processes and practices; managers having a more inclusive approach and understanding.
    3. Staff Networks – comments recognised and valued the role of our Staff Networks in establishing a more inclusive organisation. This centred around support for Staff Networks, their role in educating staff and organising events.
  - ‘What can we do to better harness our diverse communities?’. In response, there were four overarching themes:
    1. Community Events – ideas and suggestions around organising and facilitating community events to help bring people together.
    2. Empower and engage communities - providing a voice for all our communities, including those that are seldom heard through workshops and forums. Identifying and working with community leaders.
    3. Communication – accessible information for all, ensuring digital inclusion and translation services are available to those who need it.
    4. Education and learning about different cultures - raising awareness and understanding about diverse communities and cultures within Brent.

3.3.5. We have also engaged with Departmental Management Teams to share the draft ambitions; understand what departments need to advance their activities around EDI and understand what relevant activity is underway across



departments. This information, particularly the latter, has been used to help shape the strategy.

### EDI Strategy 2024-28

3.3.6. The new EDI Strategy (see Appendix A) aims to reflect the feedback outlined above and seeks to achieve our overarching focus around inclusivity through the following objectives that will span over the next four years:

- Inclusion: Accessibility and Cohesion
- Narrowing the Gap: Tackling Inequalities
- Establishing an Inclusive Workforce

3.3.7. To demonstrate that we have listened to stakeholders and residents and aim to meet their needs and deliver what matters to them, each objective is categorised into the following sections:

- What you said – themes, concerns and areas of focus that have emerged from the engagement.
- What we will do – our commitments and how we will respond to the feedback.
- How we will measure it – how we will monitor progress and success.

3.3.8. The next step is to establish a monitoring dashboard comprised of a series of Key Performance Indicators (KPIs) to measure progress. Moving forward, the strategy will be driven and monitored primarily by the new EDI Board (see paragraph 3.2.16 below).

### **The Corporate Anti-Racism Action Plan**

3.3.9. The Corporate Anti-Racism Action Plan is an important component of the EDI Strategy. The action plan complements the framing and delivery of our overarching ambitions; seeks to better coordinate existing anti-racism activity; defines and establishes our commitment to tackle racial inequality and sets a clear ambition to strive towards becoming an anti-racist organisation.

3.3.10. The action plan has been developed by drawing upon two complementary frameworks that the organisation is signed up to: the London Councils Tackling Racial Inequality Standard and the Social Care Workforce Race Equality Standard (WRES). Both frameworks are comprehensive and provide helpful guidance that we have drawn upon, combined with the existing activity underway in Brent, to create the action plan. The action plan is intentionally internal-only as it seeks to advance opportunities and resolve challenges within the organisation before establishing any ambition(s) for the borough.

3.3.11. As the action plan is internal-only, we have only engaged with internal stakeholders (staff) to ensure their voice is reflected within our ambitions. We engaged with the following groups:

- WRES Strategic Working Group

- Cultural Diversity Champions
- EDI Working Group (managers and Heads of Service across the organisation)
- Cultural Diversity Network

3.3.12. The key themes from the feedback include:

- Raising the level of aspiration and aspire towards becoming an Anti-Racist organisation, rather than framing our ambition around tackling racial inequality.
- Improving the way we capture and use data to identify trends, inform action and measure impact.
- Having clear indicators and targets, where possible, to help us demonstrate how we will be monitoring impact and change. Additionally, this will also help ensure accountability.

3.3.13. The Anti-Racism Action Plan will be a delivery strand of the EDI Strategy, overseen by the EDI Board, and will span over the same duration (2024-28). The action plan sets a new level of ambition for Brent: becoming an Anti-Racist organisation – this is defined within the plan through a series of ‘expectations’. The plan follows a similar structure to the London Councils Tackling Racial Inequality Standards and focuses on the following themes:

- Strategic Leadership
- Employee Lifecycle
- Training and development
- Policies and Processes
- Staff Networks
- Community Engagement (our organisational approach to this, through the lens of anti-racism)

3.3.14. The action plan also consists of actions, action owners, desired outcomes and performance measures that will form part of our broader, upcoming monitoring around EDI. The next steps around this product will follow the same journey as the EDI Strategy.

3.3.15. To further strengthen and demonstrate our commitment to anti-racism, it is recommended that the Council signs up to both the [UNISON Anti-Racism Charter](#) and [London Local Government Anti-Racism Statement](#) as means to work across sectors to tackle racial injustice and strengthen our commitments to anti-racism.

### **Delivering and monitoring our ambitions**

#### Corporate Equity, Diversity and Inclusion Board

3.3.16. Our EDI ambitions will be driven and monitored by the new Corporate Equity, Diversity and Inclusion Board. The Board seeks to drive our EDI ambitions and work towards embedding EDI in our culture, approaches, processes and

activities. The Board is chaired by the Chief Executive and consists of representation across departments, Staff Network co-chairs and the Cultural Diversity Champions.

3.3.17. The Board first met on the 12 March where it explored and agreed its purpose and role, and agreed four priorities for Year 1 – these priorities will be explored in detail by the Board with the view of delivering or significantly progressing the given areas after the first year:

- Consolidating the Black Community Action Plan
- Improving information sharing and our data driven approach to EDI
- Improving our organisational EDI learning & development offer
- Refreshing our approach to Equality Impact Assessments (EIAs)

### **3.4. Next steps**

3.4.1. Following endorsement from Cabinet, the organisation will seek to deliver our new ambitions over the next four years. This will be driven particularly through the new EDI Board. We will also continue to develop a dashboard to monitor our EDI ambitions.

## **4.0 Stakeholder and ward member consultation and engagement**

4.1 Extensive engagement has been undertaken to shape the EDI Strategy 2024-28 and Corporate Anti-Racism Action Plan. This is detailed within Appendix C.

## **5.0 Financial Considerations**

5.1 There are no direct financial considerations arising out of this report.

## **6.0 Legal Considerations**

6.1 Where it is reasonably thought that persons who share a protected characteristic suffer a disadvantage connected to that characteristic; and/or persons who share that characteristic have needs that are different from the needs of persons who do not share it; and/or participation in an activity by persons who share that characteristic is disproportionately low, then section 158 of the Equality Act 2010 permits positive action where it is a proportionate means of achieving a legitimate aim of enabling or encouraging persons who share the protected characteristic to overcome or minimise the disadvantage, meet specific needs or enable or encourage persons who share the protected characteristic to participate in that activity.

6.2 The Equality and Human Rights Commission (EHRC) Statutory Code of Practice in relation to services, public functions, and associations provide further clarity in relation to the positive action provisions in the Equality Act (the Act"). It explains that these enable service providers to take proportionate action to achieve fuller and more effective equality outcomes for members of groups that are socially or economically disadvantaged or excluded or who

otherwise face the consequences of past or present discrimination or disadvantage. Positive action can include, for example, providing additional or bespoke services, separate facilities, accelerated access to services, targeting resources, or induction or training opportunities to benefit a particularly disadvantaged group. Provided the action is within the parameters laid down in the Act and meets the test of proportionality, it will not amount to positive discrimination under the Act, which would be unlawful.

- 6.3 The Statutory Code also recommends that in order to identify possible causes of disadvantage, different needs, and under-representation and to develop appropriate positive action measures, service providers will benefit from the involvement of staff and members of groups sharing a relevant protected characteristic and such groups should also be involved in the evaluation of positive action measures which is following the Council's approach as set out in this report.

## **7.0 Equity, Diversity & Inclusion (EDI) Considerations**

- 7.1 The Public Sector Equality Duty, as set out in section 149 of the Equality Act 2010, 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, 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 are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 7.2 Having due regard involves the need to enquire into whether and how a proposed decision disproportionately affects people with a protected characteristic and the need to consider taking steps to meet the needs of persons who share a protected characteristic that are different from the needs of persons who do not share it. This includes removing or minimising disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic.
- 7.3 There are no negative equality implications. The aim of the Equity, Diversity and Inclusion Strategy and our Anti Racism Action plan are to advance equality of opportunity and foster good relationships within our different communities, with service users and residents. Our Strategy promotes our ambitions for Brent to become a borough that is truly inclusive; where people of all cultures and backgrounds are represented, celebrated and most importantly feel that they belong. All of the potential equality impacts will be positive for all protected groups covered under the Public Sector Equality Duty. Impacts and outcomes will be evaluated over time through internal monitoring.

## **8.0 Climate Change and Environmental Considerations**

- 8.1 There are no climate change and environmental considerations.

**Report sign off:**

**Alice Lester**

Interim Corporate Director of Communities and  
Regeneration

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# Equity, Diversity and Inclusion Strategy 2024-2028





**Brent's Equity, Diversity, and Inclusion Strategy 2024 – 2028 is a commitment to tackle inequalities and support individuals and families to reach their full potential. It is at the heart of our vision to move Brent forward together and ensure no one is left behind.**

It is through understanding and celebrating differences and working together that we, as individuals, organisations, and communities can thrive. That is why our new Strategy is centred around equity and inclusion. We are extremely proud that Brent is one of London's most diverse boroughs. Our diversity is what makes us who we are. It brings together experiences, ideas and perspectives that are essential to making our borough the amazing place that so many people call home. This Strategy has been developed and designed through conversations with our residents, service users and staff.

We know the importance of strong, thriving communities and how living within such places can directly improve the lives of those within them through a range of positive individual health, community wellbeing and cohesion outcomes. We recognise the value of relationships in communities, informal networks of support that bind people together and the strengths and assets that exist amongst our communities. Through the engagement which underpins this Strategy, we have heard your ideas and suggestions on how to celebrate, engage and empower local people.

We are proud of our diverse workforce, yet we are also aware that diversity not only means recognising and celebrating the difference within our teams, but also channelling the power of diverse perspectives and experiences to drive innovation, creativity, and success. We are keen to go beyond representation and foster an inclusive work environment where everyone, at every level of the organisation is curious to learn and improve the council culture, and to use this knowledge to serve our communities more effectively. We want to be an employer of choice where people come to work every day with a clear sense of purpose, confident in the positive impact they are having on Brent's people, communities and businesses. We know we will always have more to do, and will never be complacent, so this Strategy also sets out our focus and priorities on building an inclusive workforce.

We look forward to updating you on our progress as we deliver on our ambitions.



**Cllr Donnelly-Jackson**

Cabinet Member for Customers, Communities & Culture



**Kim Wright**

Chief Executive of Brent Council





# Introduction

**As a Council, we place our communities, businesses and workforce at the heart of everything we do. As one of the most culturally diverse boroughs in London, we know our diversity is our greatest asset. We value the strength that comes with difference and the positive contribution that this brings to our community.**

Brent's vibrancy is reflected through the data. It is one of the most ethnically diverse boroughs in the country as almost two-thirds of the population (65%) are from Black, Asian and minority ethnic groups. This ethnic diversity is then reflected through the languages we hear across the borough as 34% of residents use a main language other than English, including Gujarati, Romanian, Arabic and Portuguese amongst those top spoken languages. Over half (56%) of the borough's population were born in countries outside the UK, with the highest number of residents coming from India, Romania and Poland. Brent has one of the largest European populations in the country and the data suggests the population has grown considerably since the last 10 years, reflecting significant migration flows from Romania, Portugal, and Italy, in particular. There is also a rich religious diversity with 80% of residents having a religion compared with 57% nationally. Our largest religious group is Christian (39%), followed by those of Muslim faith (21%) and Hindu faith (16%). We appreciate that within many of these different communities, even greater diversity exists. We are keen to

continue to understand, represent and serve all our residents, including more seldom heard voices across the borough.

Brent's diversity is also reflected in the make up of our workforce, where over two thirds (69%) of Brent employees are from Black, Asian and minority ethnic (BAME) groups compared with 44% across London. The Council has an older workforce with over half the workforce aged between 41-60 (54%), while this age group comprises just 38% of the working age population. Almost two thirds (64%) of the workforce are women which is well above the proportion of women in the Brent working age population. Just over 4% of the workforce identify as LGB+ and just under 1% of employees identify as transgender. Half of the workforce are of Christian faith, 15% are Hindu and 11% are from the Muslim faith. A further 16% of the workforce indicate that they do not have a religion. Within the council, disabled people are less well represented when compared to the working age population in Brent (8% vs. 18%).



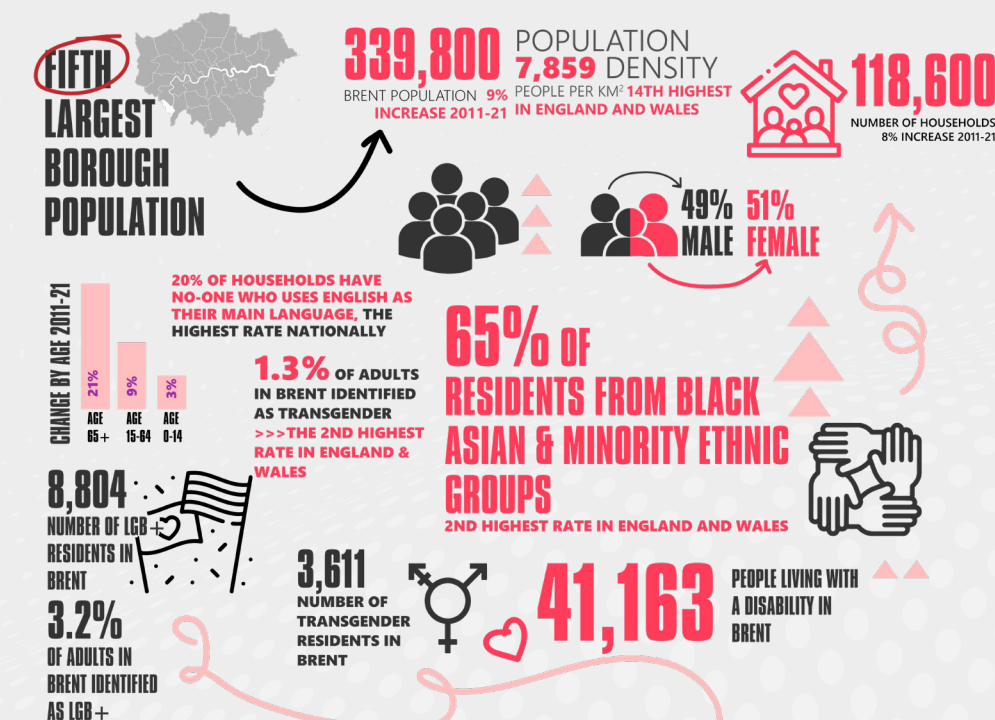
We recognise the challenges being faced across the borough and what is required to have a real recovery from the Covid-19 pandemic and to tackle the unequal effect of the cost-of-living-crisis. Our Equity, Diversity and Inclusion (EDI) Strategy sets out how we plan for everyone living, working, and studying in Brent to have the same opportunities and access. We want Brent Council to be the employer of choice for our residents and beyond. Addressing these challenges and developing a bold, ambitious response is critical for us to achieve these goals.

Our level of boldness is also reflected in the accompanying Corporate Anti-Racism Action Plan which outlines our journey to become an anti-racist organisation. It includes and reflects how we will work with other organisations to tackle racial injustice, this is demonstrated as we sign up to the London Local Government Anti Racism Statement and UNISON's Anti-Racism Charter.

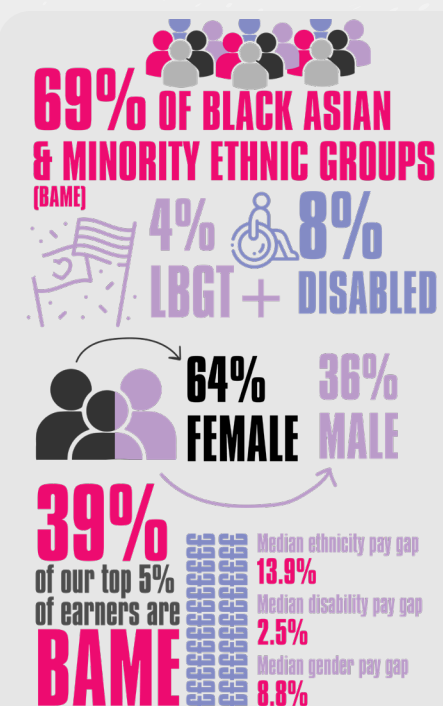
Over the past four years, we have made significant strides within the equity, diversity and inclusion arena. These programmes, events and initiatives provide us with strong foundations to move Brent from a diverse place to work and live, to one that is truly inclusive; where people of all cultures and backgrounds are represented, celebrated and most importantly feel that they belong.

The EDI Strategy 2024-2028 provides a platform for us to work towards building a more inclusive Brent. We have spoken with our service users, our communities and our staff to understand what makes people feel valued and what encourages people to participate fully in, and contribute to, building a strong cohesive community within Brent. We hope that this Strategy will bring power to these words as it outlines how we will take action and move Brent's EDI ambitions and priorities forward.

## The Profile of Brent



## In the workplace





## Our Progress Since 2019

Our Equality Strategy 2019-2023 detailed our vision: 'Removing inequality – building a better Brent' which included our four priority equality objectives:

1. **Understand the barriers to equality experienced in Brent and act to remove them.**
2. **Provide accessible information and services that are tailored to peoples' needs.**
3. **Tackle hate, harassment, and victimisation.**
4. **Lead the way in encouraging diversity to flourish in Brent.**

We have successfully been delivering these objectives through a range of initiatives and actions. Our progress has been demonstrated through some of the following achievements:

- Our **Brent Health Matters** initiative which works with communities to improve their health in the ways they want. Our outreach events provide health and care services in the community at a time and place that suits our residents. In 2023, 115 outreach events took place, being attended by over 4,000 people. Through this initiative we continue to improve our understanding and target our services on reaching those most impacted by health inequalities. For example, we responded to community concerns by working with the Royal Marsden to address the barriers Black men told us they faced in getting screening for prostate cancer.
- **The Moving on Up** programme provided support by specifically engaging and supporting young Black

men towards employment outcomes. It also aimed to raise awareness amongst employers of the issues and barriers these men may face. It supported 484 young Black men into jobs and careers over the duration of the project, which delivered employment support, working with employers and mentoring support to those within the programme.

- Our **Black Community Action Plan (BCAP)** was co-designed in 2020 with our local Black communities to tackle race inequality. This is a 10-year plan to strengthen community leadership and address priorities for change. In its first 3 years, the plan has focused on education and employment through this the BCAP has supported over 600 adults and young people in projects providing support in schools, financial literacy, entrepreneurship, digital skills, support into jobs, and mentoring.
- The Council's work on **community safety** and reducing violence has focused particularly on **reducing violence against women and girls** through our Safer Brent Partnerships. We have signed up to the Women's Night Safety Charter and continue working with staff in the night-time economy to improve women's safety across Brent.
- The Council has been recognised as a **Disability Confident Leader** and leads engagement with businesses to support them also becoming Disability Confident. Brent currently has 64 local employers registered with the Disability Confident scheme. We continue to improve accessibility to our buildings and ensuring we are inclusive through the information we disseminate.

- Brent Council has been delivering a **Supported Internships Programme** since 2020. The programme provides young neurodiverse residents (17-24 years old), the opportunity to gain vital work experience and employability skills to kickstart their careers. The programme is based at Brent Civic Centre and includes neighbouring employers. To date, 68 residents have participated, with 33 interns completing the programme, 14 interns have secured employment and a further 12 interns have gone into further education.

We will continue to evaluate the work that has been delivered through the previous Strategy and use it to push our ambitions on EDI and challenge ourselves further. The true power of Brent's diversity will be in its ability to foster a culture of inclusion where everyone feels valued and empowered, providing an environment for growth and innovation both within the community and workplace.

## Our Commitment



The overarching focus of the Strategy is 'inclusivity'. Inclusion is about how well the contributions, presence and perspectives of different groups of people are valued and

integrated into an environment.

Within our communities, this is about supporting both our established and emerging communities to feel connected and valued. We are keen to work with our communities to create opportunities for community leadership, develop greater community cohesion to encourage greater feelings of togetherness and a sense of belonging.

Within our workforce, this is about our collective mindset and organisational culture. As a Council, we are seeking to become proactive in the way we view EDI – being more curious to learn, more culturally aware and building the confidence to challenge discrimination and injustice when it is present.

Our Borough Plan sets out our ambition to be a borough where all residents can fulfil their potential and access the services they need in Brent. Our EDI Strategy supports those commitments and sets out the high standards we expect of ourselves in how we treat our workforce, and engage with and deliver services for our residents and businesses. This is underpinned by robust data collection and a commitment to monitor and evaluate impacts our proposed actions may have on access and outcomes for our communities and employees.

**Our EDI Strategy aligns with the key priorities of the Brent Borough Plan:**

**Prosperity and Stability in Brent**

**A Cleaner, Greener Future**

**Thriving Communities**

**The Best Start in Life**

**A Healthier Brent**

Equity, diversity, and inclusion cuts across all five and is central to everything we do as an organisation. We understand that delivering high-quality, effective, and inclusive services to residents, having a workforce that reflects our diverse population, and ensuring that residents and employees can achieve their potential and make a positive contribution to Brent and beyond will require an ambitious and bold response.

An important component of our EDI ambitions and commitments is to tackle racial injustice. To help realise this we are striving to become an anti-racist organisation and we have developed an accompanying Corporate Anti-Racism Action Plan that describes the organisation's anti-racism journey (link to action plan). The action plan complements our focus on inclusion, particular in relation to our workforce.

## Building the Equity, Diversity, and Inclusion Strategy

To shape our ambitions, we built on the findings from wider engagement undertaken for the Borough Plan and conducted targeted engagement to understand the issues and challenges that certain residents, service users and staff may face. We engaged with people through focus groups, workshops, and staff events to capture the voices of people who live and work in Brent. The findings from these conversations have helped to prioritise the key issues and shape our three key EDI objectives.

A copy of the consultation and engagement findings can be found here ([link to consultation report](#))

### Objective 1: Inclusion: Accessibility and Cohesion

Listening to the feedback, we heard a strong sentiment that the Council needs to be genuinely accessible for everyone. This means that Council services should be physically accessible and all communications must be inclusive and cater to different needs and preferences, ensuring everyone is engaging with the same quality of information regardless of how they access it.

To ensure needs of residents, communities and service users are being met, you told us that the Council must continue to collaborate and understand what matters most. Vital components to this include

providing opportunities to celebrate Brent's rich diversity and providing communities with a voice. You suggested that community events, programmes and initiatives are important ways of making Brent a more inclusive place. Therefore, the Council should assist in creating a stronger feeling of togetherness and a more cohesive borough through such opportunities, particularly with, and for the new and emerging communities.

### Objective 2: Narrowing the Gap: Tackling Inequalities

To understand and address inequalities it is crucial that we collect the right data, from the right people in the right way. Engagement suggested that we continue developing local solutions that address the needs of our diverse communities, ensuring no one is left behind. You told us to work with seldom heard communities and use data to target key areas of concern. For example, providing improved support and opportunities for young people and greater resource towards providing safety for all and reducing youth violence.

### Objective 3: Establishing an Inclusive Workforce

Our staff provided very clear and high aspirations around having a more inclusive workplace. Staff highlighted that a more inclusive workplace will bring better understanding of employees and their backgrounds, enabling them to bring their authentic self into work and in turn, positively impacting on the communities they serve. With two-thirds of our employees living within the borough, our staff provide an invaluable insight into the needs and concerns of our communities.

Improving the diversity and representation at all levels of the organisation, including at senior levels was another key area of focus, alongside the need for the Council to have a greater understanding of our staffs' lived experience. They conveyed a keenness to review Council policies and practices across the employee lifecycle (i.e. from recruitment, progression, learning and development to leaving the organisation) to ensure they are inclusive for all.

Staff also expressed their ambitions around becoming an anti-racist organisation, these have been captured specifically within the Corporate Anti-Racism Action Plan but they also interrelate and complement this objective.

## Our Equity Objectives

Our objectives have been established by combining the Borough plan priorities and the engagement findings. The equity objectives below frame how the Council is driving greater inclusivity across Brent.





Inclusion: Accessibility and Cohesion

A diverse, inclusive and accessible borough is one where individuals from different backgrounds and identities feel welcomed, respected, and valued. We will empower our communities to involve them in decision making and enable them to shape services that anticipate and respond to their needs.

What You Said	What we will do	How we will measure it
Use inclusive language and improve the accessibility of all Council communications	Refresh our Communication Strategy, ensuring that our communications are easy to understand and accessible, and take the different needs of our diverse communities into consideration	Usage and uptake of our accessible services such as SignVideo and translation services
Improve information and communications about services, support and opportunities for residents and service users	Review our internal approach and use of inclusive and accessible language to ensure our corporate terminology and language is up-to-date, relevant and appropriate	Monitor and evaluate the effectiveness of bespoke services and methods of engagement for new and emerging communities
Greater involvement of local people in decision making	Raise awareness to services users and across the organisation, of our accessible website, SignVideo, other specialist websites and translation and interpretation services	
	Increase awareness of, and establish new forums to gain a greater understanding of the views, ideas and concerns of our residents and communities, such as the Brent Community Review Panel, Brent Connect programmes, Care in Action and SEND Youth Forum	Greater representation of views and impact of engagements on decision making and shaping future plans

What You Said	What we will do	How we will measure it
Identify and remove barriers that may prevent certain groups from engaging with the Council	Continue providing specialised employability services through Brent Works and specialist commissioned delivery, focused on assisting members of the community currently experiencing disadvantage in the labour market, including those who need support to develop their digital skills. These programmes aim to improve life opportunities and social mobility	Monitor and evaluate impact of events co-designed with community groups
Foster greater community cohesion by creating a borough where difference and diversity is understood, celebrated and valued	Assess Council refurbishments and continually review our buildings to make sure they are accessible to all.	Evaluation of events and initiatives to continually monitor and improve our offer
	Embed an engagement programme in schools giving young people a comprehensive overview of Brent’s history and heritage through Libraries, Arts and Heritage	Maintaining our Disability Employer Level 3 status
	Adapt services to provide flexible options for residents and service users to better suit their needs, such as through our Brent Hubs and Libraries	
Improve social mobility and employment opportunities for those finding it hard to enter the labour market	Establish a new approach to EDI events, centred around empowering communities to mark and celebrate occasions that matter to them	Monitor the number of residents supported into work, apprenticeships and training and identify and tackle barriers to employment

## Narrowing the Gap: Tackling Inequalities

As inequalities persist, we will focus on who, in our communities, are experiencing the worst outcomes or those with the most urgent need to narrow existing inequalities and differences in life chances. This not only includes people with protected characteristics, but also those from other backgrounds experiencing disproportionate inequalities, such as carers, care leavers and people from lower socio economic backgrounds.

We will listen to and understand the diverse needs of communities and improve how we collect information across different services so we can understand impact. We recognise this is particularly important for our new and emerging communities. We will strive for our service delivery to be appropriate, accessible, and for our Council decisions to be properly informed by evidence. This means leaving no one or group behind but also adopting some focus on the needs that are identified through data, insights and community voices.

Page 27

What You Said	What we will do	How we will measure it
Ensure EDI issues are reflected in decision making and service delivery	Improve our Equality Impact Assessment approach helping decision makers to have a more comprehensive understanding of impacts of policies or proposals. This includes exploring the adoption of the Socio-Economic Duty	Delivering Cumulative EIAs for substantial service or policy proposals to understand potential impacts on protected groups
Collect and use robust data to target services on reaching those impacted the most	Continue to establish 'safe spaces' for residents fearing for their safety, across the Borough and online	
	Improve our understanding of where and why health inequalities exist, in partnership with the NHS, and tailor our services appropriately for adults and children and young people	Outcomes monitored by key EDI demographics, particularly gender, age, disability and ethnicity, alongside other key performance indicators
	Continue to build on our digital offer by identifying areas of digital exclusion and providing further support where required, such as connectivity, skills and access to devices	
Gain greater understanding of what different communities needs are	Provide targeted programmes which combat disadvantage using cultural and literacy initiatives through our libraries, arts and archives service	Feedback from service users, regularly monitored by protected characteristics for differences, trends and patterns

What You Said	What we will do	How we will measure it
Foster greater community cohesion by creating a borough where difference and diversity is understood, celebrated and valued	Address disproportionality in attainment levels for vulnerable groups, including looked after children, children and young people with special educational needs and disabilities (SEND) and children of specific ethnicities in partnership with Brent schools	Monitor and act upon disproportionate outcomes in partnership with our schools and continue to roll out our 'Leading from the top' anti racism campaign
	Continue providing specialised employability services through Brent Works and specialist commissioned delivery focused on assisting members of the community currently experiencing disadvantage in the labour market, including those who need support to develop their digital skills. These programmes aim to improve life opportunities and social mobility	Maintaining our Disability Employer Level 3 status
Improve social mobility and employment opportunities for those finding it hard to enter the labour market	Address disproportionality in fixed and permanent exclusions in Brent schools in partnership with Brent headteachers	Monitor the number of residents supported into work, apprenticeships and training and identify and tackle barriers to employment
	Continue to develop and adapt our support and advice offer in Brent Hubs to help residents who are struggling with the cost-of-living crisis	
	Continue to design and produce services with our communities, building on the existing model we have applied to programmes such as our Community Hubs, Family Wellbeing Centres and Community Wellbeing project	
Use data and feedback provided by service users and employees to inform policies and processes	Establish an EDI monitoring dashboard and process to collate and share feedback and information that can shape our services and practices	Evaluate our engagement campaigns to monitor uptake in services and outreach, particularly to seldom heard, new and emerging communities

## Establishing an Inclusive Workforce

We want Brent to be a truly diverse and inclusive workplace. A workplace that makes everyone, regardless of who they are or what they do for Brent Council, feel equally involved in, valued and supported at work. To ensure this, we will continually learn from the experiences of our employees and capture their voice to understand concerns and perspectives, this includes optimising the use of our staff networks and champions.

We want to ensure the council is an environment where everyone is able to thrive.

Although we are proud of our diverse workforce, we are aware that diversity not only means recognising and celebrating the differences within our teams, but also channelling the power of diverse perspectives and experiences to drive innovation, creativity, and success. We are keen to go beyond representation and foster an inclusive work environment where everyone, at every level of the organisation is curious to learn and improve the Council culture, and to use this knowledge to serve our communities more effectively. Becoming an anti-racist organisation is also central to our vision of an inclusive workforce, therefore the ambitions outlined in the accompanying Corporate Anti-Racism Action Plan also contribute to delivering this objective.

Page 28

What You Said	What we will do	How we will measure it
Provide relevant equity, diversity and inclusion training to all employees promoting greater awareness of intersectionality and improving the way in which services are delivered	Improve our corporate learning and development offer which contributes to embedding EDI within the organisation	Capture and use feedback from employees to inform learning and development offer, such as training on neurodivergence and anti-racism
Ensure that policies and processes throughout the employee lifecycle are truly inclusive	Establish a data informed journey of the employee lifecycle identifying trends relating to protected characteristics	Monitor, evaluate and address findings from reports, surveys and action plans such as the Workforce Report, our staff survey, and the Anti Racism Action Plan
Work towards a workforce that is reflective of the local community at all levels of the organisation	Establish and embed the internal Brent Council Anti-Racism Action Plan	Increase disclosure rate for employee's protected characteristic data

What You Said	What we will do	How we will measure it
Improve the way we capture and analyse workforce ethnicity data to ensure ideas, initiatives and projects are evidence led and transparent	Support our young SEND residents with work experience within the Council	Monitor uptake for specific initiatives and programmes for people from protected backgrounds
Target initiatives and programmes supporting employees from protected backgrounds	Support care leavers with work experience and apprenticeships within the Council	Annual analysis of recruitment and progression data that includes but is not limited to the proportion of Black, Asian and minority ethnic applicants compared with ethnicity of successful applicants
Ensure an environment where everyone feels safe to be themselves and continue to support the Council's Staff Networks	All staff to have performance objectives on EDI that are tailored to organisational, service or individual needs	Monitor and evaluate information on leavers exiting the organisation, including data on protected characteristics
Reduce the ethnicity, disability and gender pay gap	Enable our staff networks to provide a space for open and honest dialogues about concerns and issues affecting them, educate staff about these issues and empowering staff to establish further groups and networks, where appropriate	Growth and expansion of the collective Staff Network offer
		Monitor the ethnicity, disability and gender pay gap on an annual basis

## How we will monitor and deliver

We will continuously check and review the services we provide. This will be done through the learning from data and information we gather through the measures outlined in this Strategy, alongside what our residents and employees tell us. **To do this we will:**

- Establish an EDI Board which will champion and steer the organisation’s priorities on all matters relating to equity, diversity, and inclusion. This includes effective monitoring and review of all related work streams, projects, initiatives and action plans. The EDI Board will ensure services are held accountable for their progress in embedding best practice and will be responsible for oversight and implementation of key strategic workstreams, namely the EDI Strategy, including the internal Anti-Racism Action Plan.
- Continue to improve our Equality Impact Assessment process, to ensure that the method for completing, assessing and monitoring the impact our policies and decisions may have on different groups of people is as robust as it can be.
- Share best practice and benchmark with our partners so that we can collaborate, learn and improve from others where possible.

## Equality Act

Brent Council will continue to take a proactive approach to equity, diversity, and inclusion and meet the statutory duties under the Equality Act 2010.

The Equality Act 2010 introduced the public sector equality duty. The duty required that all public bodies, such as the Council, consider all individuals when conducting their day-to-day work, shaping their policies, and delivering services. The Act also outlines the ‘protected characteristics’ – the specific aspects of identity protected from discrimination. As an organisation providing services to a diverse community, it is vital for us to consider the protected characteristics in all we do.

The nine protected characteristics are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

The PSED requires public bodies, in the exercise of their functions, to have due regard to:

- **Eliminate unlawful discrimination, harassment, victimisation,** and other conduct prohibited by the Act.
- **Advance equality of opportunity** between people who share a protected characteristic and those who do not.
- **Foster good relations** between people who share a protected characteristic and those who do not.

In addition to these ‘general’ duties, there is also a ‘specific’ duty. This includes a requirement for public sector bodies to prepare and publish one or more equality objectives at least every four years.

Further information can be found on the Equality, Diversity, and Inclusion section of the Council’s website.







# Brent Council Corporate Anti-Racism Action Plan



Brent Council’s Corporate Anti-Racism Action Plan

This action plan outlines Brent’s commitment to becoming an anti-racist organisation and the journey the organisation will take to embed anti-racism within all we do. It forms a key part of our broader ambitions around Equity, Diversity and Inclusion (EDI) as outlined in the EDI Strategy 2024-28.

Our ambitions have been developed by drawing upon: the needs of the organisation, as defined by our staff; the London Councils Race Equality Standard and associated pilot scheme; and the Social Care Workforce Race Equality Standard (WRES).

The action plan is internal only – it is centred around what Brent (the organisation) needs to establish, develop and improve. This may act as a catalyst for ambitions or an action plan for Brent (the borough) but this is not in scope for this product. The action plan is also designed to be iterative and for progress to be reviewed annually, alongside the EDI Strategy, to ensure the actions remain fit for purpose. It is also important to be iterative as becoming an anti-racist organisation can’t be achieved overnight and entails a journey, therefore we recognise the need to be adaptable and to invest the time to get things right.

For this action plan, an anti-racist organisation is defined through a series of expectations. These expectations will inform and may continue to be refined as the organisation undertakes a journey to renew our values and behaviours.

Expectations of Brent Council, for staff:

- Leading by example across Brent to proactively and visibly fight against racism.
- Having zero tolerance to any racism, this includes establishing and maintaining a working environment free from any form of racial discrimination, harassment, bullying and victimisation.
- Fostering a work environment where everyone feels a sense of belonging and authenticity.
- Ensuring diversity of people and thought across the organisation, at all levels.

Expectations of Brent Council staff:

- Everyone is treated with dignity and respect.
- Racism is called out and met with appropriate action.
- Our leaders and managers lead by example.
- Staff are curious and go out their way to learn and understand how to embed anti-racism within their work.

The actions, desired outcomes and performance measures with this action plan are categorised into several interrelated themes that guide our anti-racism journey:

- Strategic Leadership
- Employee Lifecycle
- Training and Development
- Policies and Processes
- Strategies and Action Plans
- Staff Networks
- Community Engagement

Strategic Leadership

This theme describes how we will ensure there is clear, visible and proactive senior leadership that drives our ambition to become an anti-racist organisation.

Actions	Owner(s)	Desired Outcomes	Performance Measure(s)
CMT demonstrate a clear commitment to anti-racism by: Having a CMT designated sponsor for anti-racism who is responsible for: <ul style="list-style-type: none"><li>• Sponsoring CDN and CDCs.</li><li>• Sponsoring the Anti-Racism Action Plan.</li><li>• Challenging CMT on issues related to racial inequality.</li><li>• Having dedicated leadership meetings focused on EDI that encourages proactivity, creates actions, identifies racial inequalities that the organisation must address, track progress and ensure accountability.</li><li>• Clearly and confidently acting and demonstrating instances of allyship around anti-race practice and issues.</li></ul>	Corporate Management Team	CMT are visible and lead by example in relation to anti-racism, ensuring the organisation meets the expectations around anti-racism as defined in this action plan. Ideas and initiatives around anti-racism are visibility driven at the top of the organisation, to help permeate action and drive at all layers of the organisation. Existing networks and initiatives, such as staff networks and Cultural Diversity Champions, are supported by their Sponsor and their needs and ideas are represented at CMT.	Each member of CMT delivers at least one piece of organisation-wide content (e.g. blog, article, video, event) centred around anti-racism per year. This should pick up themes such as race, ethnicity, equality/equity, culture, diversity and could be individualised to their own journey, their directorate or their perspectives.
Brent has a public commitment to tackling racial inequality and this is embedded within our strategic objectives.	Corporate Management Team	Building on existing evidence and examples, Brent demonstrates and is seen as an organisation that understands racial inequality and seeks to be proactive in tackling injustice. This includes signing up to the Unison Anti-Racism Charter and the London Local Government Anti-Racism Statement.	Monitoring the overall delivery of the Anti-Racism Action Plan and its impact on the organisation.

Employee Lifecycle

This theme describes how anti-racism will be embedded within our culture through systems and practices that eliminate all forms of discrimination and barriers.

Actions	Owner(s)	Desired Outcomes	Performance Measure(s)
Reviewing key systems and processes for the progression of Black, Asian and Minority Ethnic (collectively and respectively) staff. This includes: <ul style="list-style-type: none"><li>Reviewing recruitment systems/ processes to ensure they help mitigate biases as far as possible and ensuring those involved in recruitment are adequately trained.</li><li>Ensuring development programmes, such as the Middle Management Development Programme and Aspiring Leaders programme, are fair and support the progression of everyone, irrespective of their backgrounds.</li><li>Review our existing learning and development offer to provide more robust pre-application support, this includes mock interviews and interview training/workshops.</li></ul>	Human Resources	<p>Bias reduced as far as possible within the recruitment process.</p> <p>More progression of Black, Asian and Minority Ethnic talent into senior roles.</p> <p>Better support for colleagues seeking to progress within the organisation, seeking to replicate the model and offer for our national graduate trainees.</p>	<p>Number of promotions for Black, Asian and Minority Ethnic staff (collectively and respectively) are proportionate to staff make up of the organisation.</p> <p>Ethnically diverse staff make up within our development programmes.</p>
Work towards a workforce which is reflective of the local community at all levels of the organisation.	Corporate Management Team and Human Resources	<p>Continue to maintain an organisation that is reflective of the Brent population.</p> <p>Seek, as best as possible, to ensure the organisation is reflective of the Brent population at all levels of seniority.</p>	<p>Annual analysis of data around levels of workforce diversity for the organisation, broken down by different levels of seniority and department.</p> <ul style="list-style-type: none"><li>Comparing the ethnic diversity of pay band ranges compared to Brent's demography as outlined in the Census (or most recent demographic analysis)</li></ul>
<p>Broaden understanding across the organisation of:</p> <ul style="list-style-type: none"><li>The impact of language and experience for Black, Asian and Minority Ethnic people within the organisation and how it affects different racial groups</li><li>White privilege</li><li>Cultural competency</li></ul>	Communities Department and Human Resources	<p>Improving the organisational knowledge and understanding of language and experience and white privilege through:</p> <ul style="list-style-type: none"><li>open conversations in collaboration with networks and groups</li><li>Sessions run by external/specialist organisations</li></ul>	<p>Number of events and sessions delivered around the use of language and experience, white privilege and cultural competency, including the number of attendees.</p> <p>Findings from our all staff surveys around feelings and attitudes within the organisation.</p>

Training and Development

This theme describes how we will establish a robust learning and development offer that will support everyone in the organisation to understand and enact upon their role in driving anti-racism in everything they do.

Actions	Owner(s)	Desired Outcomes	Performance Measure(s)
Our corporate learning and development offer contributes to embedding EDI and anti-racism within the organisation. For example: <ul style="list-style-type: none"><li>Commitment from senior managers to support mentoring.</li><li>Mandatory induction for all staff where EDI and anti-racism training is included.</li><li>Establishing mandatory recruitment for hiring managers to help reduce bias in the recruitment process.</li></ul>	Human Resources	The organisation has a robust EDI and anti-racism learning and development offer that is well attended, encourages curiosity and enables people to understand how to embed EDI and anti-racism within their work.	<p>Proportionate uptake of mentoring schemes for colleagues from Black, Asian and Minority Ethnic backgrounds, including measuring the impact of these schemes e.g. feedback.</p> <p>Training attendance and monitoring for:</p> <ul style="list-style-type: none"><li>Staff induction</li><li>Recruitment training</li></ul> <p>Findings from our all staff surveys around feelings and attitudes within the organisation</p>
Establishing corporate facilitator-led workshops focusing on EDI and anti-racism. Workshops will also explore themes including types of bias, white privilege, cultural competency and micro-aggressions	Corporate Management Team and Human Resources	The organisation has robust anti-racism training, as part of the broader EDI learning and development offer.	Findings from our all staff surveys around feelings and attitudes within the organisation. Eight workshops delivered per year, including assessments of the workshops effectiveness through session evaluations.
<p>Review our existing processes and procedures, where necessary, to embed race equity and demonstrate commitment to and evidence of building an anti-racist culture.</p> <p>For instance, this could be within the Workplace or Harassment and Bullying Policy.</p>	Communities Department and Human Resources	Anti-racism is embedded within our processes and procedures, where necessary.	Raise awareness of processes and support and review Workplace Resolution Policy to embed the same.
Develop clear guidance on appropriate terminology for referring to Black, Asian and minority ethnic communities in the workplace, whilst engaging affected communities in the process.	Communities Department and Human Resources	The organisation establishes guidance around terminology when referring to Black, Asian and minority ethnic communities in the workplace,	N/A

Policies and Processes

This theme describes how our internal policies and processes will contribute to fostering an anti-racist culture, supporting staff and ensuring dignity at work.

Actions	Owner(s)	Desired Outcomes	Performance Measure(s)
Review our existing processes and procedures, where necessary, to embed race Equity and demonstrate commitment to and evidence of building an anti-racist culture.  For instance, this could be within the Workplace or Harassment and Bullying Policy.	Communities Department and Human Resources	Anti-racism is embedded within our processes and procedures, where necessary.	Raise awareness of processes and support and review Workplace Resolution Policy to embed the same.
Develop clear guidance on appropriate terminology for referring to Black, Asian and minority ethnic communities in the workplace, whilst engaging affected communities in the process.	Communities Department and Human Resources	The organisation establishes guidance around terminology when referring to Black, Asian and minority ethnic communities in the workplace,	N/A

Strategies and Action Plans

This theme describes how we will create and embed our ambitions and actions to deliver change and impact.

Actions	Owner(s)	Desired Outcomes	Performance Measure(s)
Establish and embed the Brent Council Anti-Racism Action Plan	Corporate Management Team	The organisation adopts the Anti-Racism Action Plan and it is embedded within the broader ambitions around EDI.  The action plan is monitored, reviewed and delivered.	All indicators as suggested within the action plan.

Staff Networks

This theme describes how we will support our staff networks and critical friends to influence, drive and deliver change within the organisation.

Actions	Owner(s)	Desired Outcomes	Performance Measure(s)
Enable our staff networks to allow staff open and honest conversations about race-related issues. Staff networks: <ul style="list-style-type: none"><li>• Are intersectional by nature and initiatives are co-designed.</li><li>• Are engaged with on relevant council policies and strategies and work closely with the corporate equality team and HR to ensure input into EDI and anti-racism work.</li><li>• Are supported by a Sponsor.</li><li>• Provide safe spaces for staff to discuss important issues.</li><li>• Maintain a regular dialogue with senior leadership providing opportunities for diverse voices to be part of senior leadership decision-making processes.</li><li>• Deliver initiatives through the staff participative approach, as informed by corporate initiatives.</li><li>• Are used to share learning and best practice.</li></ul>	Corporate Management Team, Communities Department and Human Resources	Staff networks continue to operate autonomously acting as a support network, educator and critical friend.  Staff networks continue to feel supported and enabled to grow and flourish.	Feedback from staff network sessions, including how it is being acted upon.  Level of staff network activity linked to EDI and anti-racism such as communications, events, sessions.  Maintained dialogue and feedback with the organisation's decision makers, including through the EDI Board.
Enable our Cultural Diversity Champions (CDCs) to fulfil and deliver their roles. Ensure they: <ul style="list-style-type: none"><li>• Represent all cultural backgrounds.</li><li>• Raise understanding and share knowledge of issues which have been raised with CDCs to inform council actions.</li><li>• Communicate, plan and take relevant action for supporting any Council objectives.</li><li>• Share knowledge and learning relating to culture, heritage and identity with key stakeholders for positive change.</li><li>• Promote the agenda for social justice in the Council by working closely with departmental management and identifying any common themes.</li><li>• Help identify barriers to Equity, diversity and inclusion and provide suggestions to overcome these.</li><li>• Foster good relations between management and employees providing support for both whilst collaborating with other CDCs for a consistent but tailored approach</li></ul>	Corporate Management Team and Human Resources	Cultural Diversity Champions continue to feel supported and enabled to grow and flourish.  Cultural Diversity Champions provide effective support and advice to staff, teams and services.  Cultural Diversity Champions feedback themes, experiences and challenges experienced by staff.  Cultural Diversity Champions consistently report on cases.	Maintain a minimum number of seven CDCs.  Maintain dialogue and feedback with the organisation's decision makers, including through the EDI Board.  Annual report on CDC feedback and cases.

## Community engagement

This theme describes our approach to working with our diverse community to support their ambitions, and demonstrate our commitments around anti-racism.

Actions	Owner(s)	Desired Outcomes	Performance Measure(s)
<p>Brent consistently engages with key community groups to understand and work to collaboratively tackle issues related to racial inequality.</p> <p>Engagement with these communities must be genuine and meaningful, underpinned by the following principles:</p> <ul style="list-style-type: none"> <li>• Work Together – bringing experiences together and creating opportunities for us all to take an active role in shaping decisions, contributing local insights, and collectively finding solutions to locally defined issues.</li> <li>• Be Honest – honesty in sharing around available resources, in the interest of identifying opportunities to pool resources.</li> <li>• Include Everyone – a shared passion for all individuals and groups to be able to participate on any topic that the council is seeking to learn more about.</li> <li>• Respect Community Knowledge – identifying and building upon the strengths and capabilities within our community.</li> <li>• What's in it for you? – we show communities why it is important for us to hear from them and we value their experiences.</li> <li>• Get Our Timing Right – allowing people enough time to contribute their experiences and expertise.</li> <li>• We Will Support You – support communities to contribute and engage.</li> </ul>	<p>Communities Department</p>	<p>The organisation proactively engages with and builds relationships, across services, a range of community representatives and groups in the interest of tackling racial inequality in Brent.</p>	<p>An annual report will be produced by the central Community Engagement Team that will be reviewed corporately and at our relevant scrutiny committee. This will set out how community input has influenced decisions and the extent to which residents have been involved from the earliest opportunity. It will include what we have learnt from conducting exercises that are deliberative in nature and monitor how those conversations have been developed into new ways of working or changes in strategy and policy.</p> <p>Understanding impact through monitoring tools such as surveys and stories that tell us:</p> <ul style="list-style-type: none"> <li>• Satisfaction of communities engaging.</li> <li>• The happiness of communities.</li> <li>• Heat maps of engagement conducted and the gaps where people are not engaging.</li> <li>• How changes to service design positively impact on those using them</li> </ul>

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# Equity, Diversity and Inclusion Strategy

2024-28 Engagement Findings Report

# Introduction

## This report details the engagement that has been undertaken to inform Brent Council’s new Equity, Diversity and Inclusion Strategy 2024-28.

Engaging with key stakeholders and reflecting their views and ideas was at the heart of our approach whilst developing the Strategy. We targeted engagement with council staff, community groups and organisations and seldom heard voices across the borough. This engagement aimed to gain a deeper understanding of the key equity, diversity and inclusion (EDI) issues and concerns our residents, service users, communities and staff may face. We engaged with people through group discussions, workshops and through our all-staff events. The engagement took place between March 2023 – September 2023.

Given the range of diverse groups the Council engaged with, slightly different approaches and questions were used, depending on the audience. (A full breakdown of the groups consulted with are available in Annex A). We explored the following themes at every session:

- Understanding and defining ‘inclusion’
- Community cohesion and togetherness across Brent
- How well equity, diversity and inclusion are embedded, understood and experienced across the borough
- Specific issues, concerns and opportunities which arose around EDI, based on the audience.

Additionally, the engagement that was undertaken was designed to supplement the comprehensive consultation and engagement exercise that shaped the Borough Plan 2023-27, as the findings remain relevant and appropriate for the EDI Strategy. The Borough Plan engagement sought to understand the perspectives and priorities that residents and

partners had for the borough, some of which related to EDI. The detailed findings from the Borough Plan engagement can be found [here](#).

By reviewing this information and combining the findings, we have established the three overarching objectives that will guide the Council’s EDI ambitions for the next four years:

- Objective 1:**  
Inclusion: Accessibility and Cohesion
- Objective 2:**  
Narrowing the Gap: Addressing Inequalities
- Objective 3:**  
Establishing an Inclusive Workforce

This report will provide an overview of the key findings and outline how they translate into the three overarching objectives.

To help frame our action plan, Brent Council participated in the London Council’s Tackling Race Inequality Standard pilot scheme. The purpose of this was to support London local authorities on their anti-racism journeys. Fourteen boroughs participated in the six month pilot. Brent Council was paired with Lambeth Council to undertake a series of informal challenge sessions where we reviewed each others EDI processes, policies and practices, initiatives and infrastructure.

Through this process, best practice was shared and informed our next steps to embed our Anti-Racism Action Plan across the organisation. This included reviewing our EDI infrastructure, to ensure key information is shared and communicated across the Council. It has also contributed to the creation of our new Corporate Equity, Diversity and Inclusion Board, that will drive and monitor our EDI ambitions. The peer review also highlighted the need for more visible leadership around anti-racism with regular and open dialogue amongst senior leaders and staff. Additionally, feedback suggested that there needed to be stronger communication with our external stakeholders, to ensure a greater understanding of the work the Council is doing, which may assist with co-

production of initiatives with our communities. In addition to the peer support review, there were also fortnightly meetings with the other boroughs, where impactful discussions were had on best practice taking place and the different ways pan-London initiatives, namely the London Councils Tackling Racial Inequality Standard and Anti-Racism Statement, are being adopted within organisations.

Our internal engagement with staff, centred around workshops with key staff groups to understand their concerns, challenges and level of ambition for the organisation. This action plan is an important component of the EDI Strategy as the action plan complements the framing and delivery of our overarching ambitions. It seeks to better coordinate existing anti-racist activity whilst defining and establishing the Councils commitment and ambition to strive towards becoming an anti-racist organisation.

### Objective 1: Inclusion: Accessibility and Cohesion

There was a very strong sentiment that the Council should be genuinely accessible to everyone. This included the need to have the systems, processes and physical infrastructure adapted to meet everyone’s needs. It was unanimous

across all groups that Council services should be physically accessible and all communications must be inclusive and cater to different needs and preferences, ensuring everyone is engaging with the same quality of information regardless of how they access it. For example, the Pensioners Forum emphasised the concerns about digital exclusion and were keen for options being available which were not solely available online. Additionally, they were keen to see greater physical access to buildings and parks, including more toilets and benches to enable them to feel less isolated and able to participate in public life.



The Deaf Parent Group also provided several suggestions around tools and face-to-face services that can support their needs. They requested that all Council communications be simple and available in a variety of formats and through different mediums.

To ensure needs of residents, communities and service users are being met, participants told us that the Council should continue to collaborate with residents and community groups to understand what matters most to them. It was suggested that certain minority groups or marginalised communities’, including those with disabilities, felt that their needs were not widely recognised across the Council, which may result in a different quality of service delivery and engagement.

*“Brent should be an inclusive borough that is aware of and responsive to the needs of residents”*

A vital component of this included providing opportunities to celebrate Brent’s rich diversity and enabling communities to have a voice. Many participants suggested that community events, programmes and initiatives were important ways of making Brent a more inclusive place. Feedback highlighted the need to educate and raise awareness of our diverse make-up. For example, providing opportunities through our events to engender a greater understanding of our different cultures, particularly of new and emerging communities. This was alongside the need to improve interactions with particular groups, such as the hearing impaired and visually impaired communities, who are often indirectly excluded due to lack of understanding of how to engage with them.

It was felt that the Council had a key role in creating a stronger feeling of belonging and a more cohesive borough through such opportunities.

*“A day for all communities to come together to promote community spirit, understanding and togetherness”*



Objective 2: Narrowing the Gap; Addressing Inequalities

“Let’s focus on equity, recognising not everyone is starting from the same point.”

Participants asked the Council to continue developing local solutions which address the needs of our diverse communities, ensuring no one is left behind. Working with and co-designing services with seldom heard communities would provide further insight into those communities’ needs and help develop the best solutions for them.

“Creating inclusive services and working with local communities to understand what works for them.”

Participants also highlighted the need to use data to better inform our services and activity. By looking at differences in access, delivery and outcomes of services, targeted work could be invaluable in addressing inequality. For example, providing improved support and opportunities for young people. This was discussed, in terms of looking at differences in educational attainment between children of different ethnicities and in reference to providing greater opportunity for young people to thrive within the borough. Feedback also suggested that some young people do not believe they have a voice with the Council, the Police or within the education system and therefore greater engagement with them, could reduce inequality.

Brent Youth Parliament participants expressed the need for greater and more targeted communications about initiatives and programmes such as Brent Youth Parliament, apprenticeship schemes and general activities across the borough.

“There are lots of opportunities available for young people ... [that they can be] involved in, apprenticeships and so on. But where are they promoted? Always lots going on in Brent but we don’t always know about it.”

Other areas where inequalities were highlighted, included women’s safety and health. Whilst there

was recognition that there are challenges around resources and funding, increasing women only spaces and raising awareness of initiatives to keep women and young girls safe need to continue. Similarly, in relation to health inequalities, having a targeted approach within particular communities is vital. In particular, having data and using their voices to understand needs must be at the heart of this.

“Looking at data cut by ethnicity, disability, and deprivation to understand who isn’t accessing our services.”

Objective 3: Establishing an Inclusive Workforce

Although we asked all stakeholders for feedback around our workforce, the majority of the feedback and suggestions were provided by staff, through our all staff events, staff networks, Cultural Diversity Champions and from our internal EDI working group.

Participants provided very clear and high aspirations around having a more inclusive workplace.

Key components of this included having a diverse, open and transparent environment where there was trust and support for all. This is illustrated in the word cloud.



“Safe to make mistakes’ culture, encourage open dialogue, and ‘it’s okay to ask!”

Staff highlighted that a more inclusive workplace would bring better understanding of staff and their backgrounds, enabling them to bring their authentic self into work and in turn, positively impacting on the communities they serve.

The themes highlighted as being key to establishing an inclusive workforce within Brent include:

- Organisational Culture and Ways of Working – this strongly focused on collaborating with other areas and team building; having more opportunities to get to learn and empower staff in a safe and open environment, whilst acknowledging and celebrating success.
- Employee lifecycle – this included further learning about different cultures and protected characteristics; fairer, open and transparent recruitment processes and practices; managers having a more inclusive approach and understanding.
- Staff Networks – a number of comments recognised and valued the role of Staff Networks in establishing a more inclusive organisation. This centred around support for Staff Networks, their role in educating staff and organising events.

Terms	Frequency
Diversity/Diverse	183
Respect	93
Fair/Fairness	80
Understanding	76
Welcoming	55
Equality	45
Trust	45
Supportive	43
Open	39

Diversity and representation at senior levels was another key area of focus, alongside the need for the Council to have a greater understanding of our staff’s lived experience.

Brent’s Internal Anti-Racism Action Plan

As the action plan is internal, engagement has been with staff groups to ensure their voice is reflected within our ambitions. The key themes emerging from the feedback were centred around raising the organisations level of aspirations and being bolder in expressing our commitments. This led to set the overarching ambition to strive to become an anti-racist organisation.

Staff also highlighted the need to improve the way we capture and use data to identify trends, inform action and measure impact. It was felt that it is vital to have clear indicators and targets to ensure the organisation can monitoring impact and change.

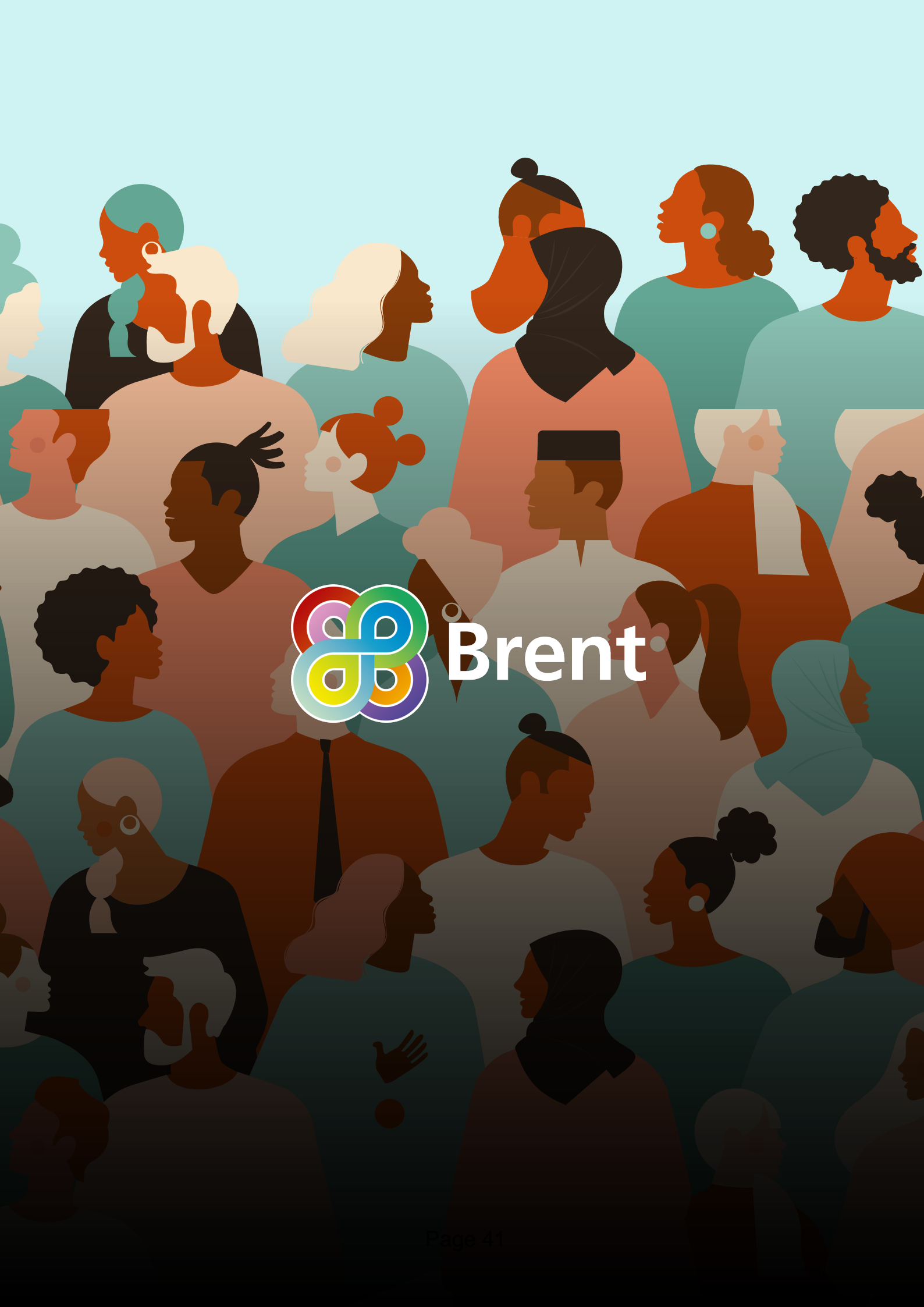
Groups engaged with to inform the EDI Strategy 2024-28 and internal Anti-Racism Action Plan

Internal Stakeholders

- All Staff Forward Together events took place during March 2023. In total five sessions took place. These provided information about the draft EDI Strategy and were an opportunity for staff to discuss the priorities with each other and provide feedback.
- Staff Networks and Cultural Diversity Champions (CDC's) workshops explored key priorities within the Strategy and how the Council's EDI ambitions could link in with the work of the Networks and Champions for effective implementation. The Cultural Diversity Staff Network and our CDCs are also key stakeholders in the creation and implementation of our Anti-Racism Action Plan.
- An Internal Working Group was set up earlier this year (2023), to assist in the creation, monitoring, and delivery of the EDI Strategy and the Anti-Racism Action Plan. The group has representation across all services to provide service area expertise and representation across management and staff networks.
- An online Member workshop took place that shared key information around the draft EDI Strategy and the emerging priorities. This provided an opportunity for Councillors to help frame our EDI priorities for the next four years and discuss EDI challenges and opportunities within Brent.
- Staff Survey for all staff took place 13 November - 8 December 2023, incorporated EDI questions, and the results will be fed into the Strategy. This will provide an opportunity to gauge the level of commitment staff feel the organisation has towards EDI and the awareness of the different initiatives and support available to all staff.
- Workforce Race Equality Standard (WRES) Strategic Working Group. This internal working group assists in the monitoring and evaluation of progress of Brent's action plan, against the six areas of workforce development provided by the WRES framework.
- Violence Against Women & Girls Delivery Group consider the Safer Brent Partnership's approach and progress in reducing violence against women in Brent and make recommendations for addressing these issues.

External Stakeholders

- The Brent Pensioners Forum brings older people together with organisations working on their behalf. The main purpose of this group is to represent the interests of older people.
- The Disability Forum is an interactive meeting for residents where a variety of topics are discussed and ideas shared. It is aimed at residents with a physical, developmental or a learning disability or those who in some way support or care for people with a disability.
- The Brent Multi-Faith Forum was established in 2003 with the intent of ensuring that the diverse faith communities of Brent are represented and considered.
- Brent Youth Parliament (BYP) is made up of young people aged between 10 and 19 (up to 25 for young people with special educational needs or disabilities) who represent their schools and youth groups.
- Brent Deaf Parents Group meets up once a month, offering a variety of workshops and discussion topics throughout the year.
- Middlesex Association of the Blind provide specialised services, care and facilities for the visually impaired.
- Brent residents open workshops in Stonebridge, Kingsbury, and Wembley (3 workshops) were open facilitated workshops for anyone living or working in Brent to express their concerns, issues and ideas around equity, diversity and inclusion issues across Brent.



Brent

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## EQUALITY ANALYSIS (EA)

<b>POLICY/PROPOSAL:</b>	<b>Equity, Diversity and Inclusion Strategy</b>
<b>DEPARTMENT:</b>	<b>Communities and Regeneration</b>
<b>TEAM:</b>	<b>Equity, Diversity and Inclusion</b>
<b>LEAD OFFICER:</b>	<b>Tom Pickup/Angela Chaudhry</b>
<b>DATE:</b>	<b>07/03/2024</b>

*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.

The Equity, Diversity and Inclusion Strategy 2024- 28 incorporates our ambitions for the next four years. It seeks to achieve our overarching focus around inclusivity through the following objectives:

- Inclusion: Accessibility and Cohesion
- Narrowing the Gap: Tackling Inequalities
- Establishing an Inclusive Workforce

The Strategy will be monitored and evaluated through an EDI dashboard and driven by our internal EDI Board which will seek to embed our EDI priorities across the Council

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

The Strategy affects everyone positively. The first two objectives relate to how we can improve access, outcomes and community cohesion for our residents, service users communities. Our third objective focuses on our workforce highlighting how we can make the working environment more inclusive, so everyone feels they belong, can progress within the Council regardless of backgrounds.

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.

Our Strategy goes beyond the three tenets of the Public Sector Equality Duty, with our three objectives advancing the equality of opportunity between people who share a protected

characteristic and those who don't and developing initiatives to programmes to raise awareness and foster good relations between people who share a protected characteristic and those who don't.

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	Impact Neutral/None	Impact 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

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 Strategy is underpinned by the extensive engagement carried out as part of the **Borough Plan consultation**. In addition to this, targeted engagement was conducted between March – September 2023, to ensure seldom heard voices of our communities were heard. Additionally, through the all-staff sessions further input on the priorities and concerns of staff were collated. The EDI Engagement Findings report provides greater detail of this.

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>	Positive impact as the Strategy aims to reduce inequality across all protected groups and people from other backgrounds that may also experience disproportionate inequalities
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### **DISABILITY**

<b>Details of impacts identified</b>	Positive impact as the Strategy aims to reduce inequality across all protected groups and people from other backgrounds that may also experience disproportionate inequalities
--------------------------------------	--

### **RACE**

<b>Details of impacts identified</b>	Positive impact as the Strategy aims to reduce inequality across all protected groups and people from other backgrounds that may also experience disproportionate inequalities
--------------------------------------	--

### **SEX**

<b>Details of impacts identified</b>	Positive impact as the Strategy aims to reduce inequality across all protected groups and people from other backgrounds that may also experience disproportionate inequalities
--------------------------------------	--

### **SEXUAL ORIENTATION**

<b>Details of impacts identified</b>	Positive impact as the Strategy aims to reduce inequality across all protected groups and people from other backgrounds that may also experience disproportionate inequalities
--------------------------------------	--

### **PREGNANCY AND MATERNITY**

<b>Details of impacts identified</b>	Positive impact as the Strategy aims to reduce inequality across all protected groups and people from other backgrounds that may also experience disproportionate inequalities
--------------------------------------	--



## **RELIGION OR BELIEF**

<b>Details of impacts identified</b>	Positive impact as the Strategy aims to reduce inequality across all protected groups and people from other backgrounds that may also experience disproportionate inequalities
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## **GENDER REASSIGNMENT**

<b>Details of impacts identified</b>	Positive impact as the Strategy aims to reduce inequality across all protected groups and people from other backgrounds that may also experience disproportionate inequalities
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## **MARRIAGE & CIVIL PARTNERSHIP**

<b>Details of impacts identified</b>	Positive impact as the Strategy aims to reduce inequality across all protected groups and people from other backgrounds that may also experience disproportionate inequalities
--------------------------------------	--

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?

The consultation and engagement from the Borough Plan and through the EDI Strategy was comprehensive and provided us with sufficient information for us to create the objectives and EDI ambitions going forward. The Borough Plan engagement was informed by a breadth of residents and the EDI Strategy engagement focused on specific groups (see below) and protected characteristics to complement the findings from the Borough Plan engagement. This is outlined in the EDI Engagement Findings report that will be published alongside the Strategy.

Groups engaged with during the EDI Strategy engagement exercise:

- Brent staff, including:
  - WRES Strategic Working Group
  - Cultural Diversity Champions
  - Internal EDI Working Group, comprised of managers and Heads of Service across the organisation
  - Cultural Diversity Network
  - Forward Together workshops
  - Domestic Abuse & Violence Against Women and Girls (VAWG) Delivery Group
- Brent staff network co-Chairs
- Members Briefing Session
- Deaf Parents Group
- Brent Pensioners Forum
- Brent Multi-Faith Forum
- Middlesex Association for the Blind



- Brent Disability Forum
- Brent Youth Parliament
- 3x open workshops in Wembley, Kingsbury and Stonebridge

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?

N/A

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

The strategy will be monitored and evaluated by an EDI dashboard, comprised of outcomes and measures, and driven by our internal EDI Board which will seek to embed our EDI objectives across the Council.

## 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 EDI Strategy 2024-2028 provides a platform for us to work towards building a more inclusive Brent. We have spoken with our service users, our communities, our Councillors and staff to understand what makes people feel valued and what encourages people to participate fully in, and contribute to, building a strong cohesive community. All of these ambitions fulfil and go beyond our Equality Duties having a positive impact on our residents, service users and workforce.

## SECTION D – RESULT

Please select one of the following options. Mark with an "X".

<b>A</b>	<b>CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED</b>	<b>X</b>
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<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>
Regular review of the EDI monitoring dashboard, with an annual report to the EDI Board on progress	Comprehensive monitoring and evaluation of our EDI internal action plan	Angela Chaudhry/Tom Pickup	March 2025

## SECTION F – SIGN OFF

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Angela Chaudhry
<b>REVIEWING OFFICER:</b>	Tom Pickup
<b>HEAD OF SERVICE / Operational Director:</b>	Janet Latinwo

 <b>Brent</b>	<b>Cabinet</b> 8 April 2024
	<b>Report from the Interim Corporate Director Communities and Regeneration</b>
	<b>Lead Member – Cabinet Member for Regeneration, Planning and Growth (Councillor Tatler)</b>
<b>Sudbury Town Neighbourhood Forum Application – Consultation Responses</b>	

<b>Wards Affected:</b>	Sudbury, Northwick Park and Wembley Central
<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>List of Appendices:</b>	Five Appendix A: Consultation Responses and Officer Comment Appendix B: Sudbury Town Neighbourhood Forum Application Letter Appendix C: Sudbury Town Neighbourhood Forum Constitution Appendix D: Sudbury Town Neighbourhood Forum Support Statement Appendix E: Sudbury Town Neighbourhood Forum Members
<b>Background Papers:</b>	None.
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	Paul Lewin, Team Leader Planning Policy 020 8937 6710 <a href="mailto:paul.lewin@brent.gov.uk">paul.lewin@brent.gov.uk</a>

## 1.0 Executive Summary.

- 1.1. For Cabinet to consider responses received to the consultation undertaken for Sudbury Town Neighbourhood Forum to be designated and associated officer responses, and for Cabinet to approve the designation of Sudbury Town Neighbourhood Forum.

## **2.0 Recommendation(s).**

- 2.1 Cabinet considers the responses received to the consultation undertaken for Sudbury Town Neighbourhood Forum to be designated and associated officer responses as set out in Appendix A.
- 2.2 Cabinet, taking into account the material submitted with and supporting the application set out in Appendices B, C, D and E, approves the designation of the Sudbury Town Neighbourhood Forum.

## **3.0 Detail**

### **3.1 Cabinet Member Forward**

- 3.1.1 Neighbourhood planning is an opportunity for residents and businesses in an area to identify their own policies at a very localised level to be applied to development in their areas. The policies that neighbourhoods can take forward are very much at their discretion, but arguably could encompass some or all of the five strategic priorities set out in the borough plan.

### **3.2 Contribution to Borough Plan Priorities & Strategic Context**

- 3.1.2 A good neighbourhood forum as a local democratic body provides a voice for local communities, consistent with the Borough Plan Thriving Communities Priority: Desired Outcome 1 of 'Enabling our Communities'. The Council works with and encourages forums where communities wish to set them up, ensuring that they meet their statutory requirements.

## **3.3 Background**

### **Neighbourhood Planning**

- 3.3.1 The Localism Act 2011 introduced greater statutory provisions for local communities to shape development outcomes in their area through the planning system. Principally through this act, but also through subsequent legislation, provisions within the 1990 Town and Country Planning Act (as amended) (the Act) and the Neighbourhood Planning (General) Regulations 2012 (as amended) (the Regulations) allow communities to:
  - A) set planning policies through a neighbourhood plan that forms part of the development plan used in determining planning applications, and
  - B) grant planning permission through Neighbourhood Development Orders and Community Right to Build Orders for specific development which complies with the order.
- 3.3.2 Where a community wants to take up the opportunities offered by neighbourhood planning, they can only do so where there is a 'qualifying body'. In non-parish areas, for the delivery of Neighbourhood Plans or Neighbourhood Development Orders, the relevant qualifying body is a

neighbourhood forum. The qualifying criteria and processes for establishing a neighbourhood forum are set out in the Act and Regulations.

- 3.3.3 The Act sets out that where designated a forum ceases to have effect at the end of the period of 5 years beginning with the day on which it is made. To maintain forum status, or if it has lapsed, to reattain forum status, the process is the same as that for an application for a new forum.

#### **Sudbury Neighbourhood Area and Sudbury Town Residents' Association**

- 3.3.4 Sudbury Neighbourhood Area and an associated neighbourhood forum, Sudbury Town Residents Association (STRA) was initially designated on 12<sup>th</sup> December 2012. This was renewed on 8<sup>th</sup> December 2017. An application by STRA for forum status was refused by [Cabinet on 16<sup>th</sup> November 2023](#). This was for a variety of reasons related to lack of compliance with sections 61F(5) and 61(7) of the Act. Following a call in, the Resources and Public Realm Scrutiny Committee on 18<sup>th</sup> December 2023 considered Cabinet's decision. The Committee agreed to confirm the Cabinet decision. The formal refusal decision notice to STRA was sent on the 19<sup>th</sup> December 2023. The Council has not been made aware of any formal process for legal challenge of that decision being initiated by STRA.

#### **Sudbury Town Neighbourhood Forum Application**

- 3.3.5 The 16<sup>th</sup> November 2023 Cabinet report set out that an alternative 'Sudbury Matters' application for a neighbourhood forum for the Sudbury Neighbourhood Area had been submitted in response to the STRA application but held in abeyance by its proponents. This was subject to a process proposed by the Council being taken forward, of third-party impartial support from specialists being provided by using Locality; a body that supports local community organisations. Locality is part funded by DLUHC to support neighbourhood planning. They appointed Urban Vision, independent consultants with expertise on arbitration, to assist. Their remit was to help find an agreed and inclusive process for taking forward a neighbourhood forum for Sudbury. STRA were invited to participate in this process and attended the first meeting but, despite being invited, did not attend any other meetings.
- 3.3.6 As part of this process the 'Sudbury Matters' group did however work with Urban Vision. The outcome of that process has been that that group submitted an application to be the prospective neighbourhood forum, under the revised title of Sudbury Town Neighbourhood Forum. The application applied to the same geographical extent as the original Sudbury Neighbourhood Area.

#### **Information required to support an application for neighbourhood forum status**

- 3.3.7 The Regulations set out what is required when an organisation submits a neighbourhood forum application to the local planning authority. It must include:

- a) the name of the proposed neighbourhood forum,
- b) a copy of the written constitution of the proposed neighbourhood forum,
- c) the name of the neighbourhood area to which the application relates and a map which identifies the area,
- d) the contact details of at least one member of the proposed neighbourhood forum to be made public under regulations 9 and 10, and
- e) a statement which explains how the proposed neighbourhood forum meets the conditions contained in section 61F(5) of the 1990 Act.

3.3.8 Each of the criteria was considered to have been met within the submission material set out in this report's appendices. Appendix B is the application letter. This includes point d) above. Appendix C is the proposed constitution, this addresses points a), b) and c). Appendix D sets out how criterion e) are met. In addition, requirements set out in Section 61F (5), such as open membership and attaining the minimum 21 members, appear to have been met when considering Appendix E. Separate information has been provided on the location and demographic characteristics of members. This is not being made publicly available due to data protection requirements. Taking account of this, the membership is considered to be representative of the area in terms of location and characteristics. Also that the Forum is established for the express purpose of promoting or improving the social, economic and environmental well-being of an area that consists of or includes the neighbourhood area concerned. On this basis, the application was valid to consult upon.

### **Consultation process**

3.3.9 The regulations state that consultation has to take place for a minimum of 6 weeks. Following a Delegated Decision by the Interim Director of Communities and Regeneration in consultation with the Lead Cabinet Member Regeneration, Planning and Growth on 8<sup>th</sup> January 2024, consultation on the prospective Forum's application was undertaken between 18<sup>th</sup> January 2024 and 29<sup>th</sup> February 2024. The consultation was publicised through notification to those on the planning policy database and statutory consultees, through the Council's media outlets, the Council's web-based consultation platform, within the members' bulletin, e-mail to the respective ward councillors and placing the documents attached in the appendices to this report within the Council's Wembley and Ealing Road libraries. In addition, the applicants worked to publicise the consultation with residents and businesses in the area.

### **Summary of Consultation Responses Received**

3.3.10 In total 132 responses were made to the consultation. 121 were in favour of the designation of Sudbury Town Neighbourhood Forum, five were against, two were unclear and four (statutory consultees) had no opinion either way. One councillor responded, in support, Sudbury ward member, Cllr Benea. The consultation responses received and officer responses to them are set out in Appendix A. There are no recommended changes to the Forum's application material submitted or actions it should undertake to address comments raised.

- 3.3.11 Reasons for support included it being important for local residents to have a say in planning and development in their area and that the forum would serve as a tool for the community to voice their concerns and opinions. Some people saw it as a mechanism to protect green space, some to stop additional development and some to stop development out of character with the area.
- 3.3.12 Reasons against the designation included the fact that STRA had performed the role of forum, the lack of transparency and accessibility of the prospective forum, and the Council's disregard of the previous forum's comments meant it was pointless to designate another one. In relation to the objections, it is considered that sufficient mechanisms there is nothing of concern that indicates a lack of consistency with the statutory requirements for a prospective neighbourhood forum, which is what the Council has to assess the application against.
- 3.3.13 In relation to the transparency issue raised, this will be addressed when the forum is up and running including investment in a website, the start of regular meetings, including an AGM and election of members to key positions in the forum. Officers will monitor this on an on-going basis and intervene where necessary to avoid the potential for the forum to act outside its constitution or in any other manner inconsistent the statutory requirements.

**What happens when more than one application is received for a neighbourhood forum for an area?**

- 3.3.14 As indicated, the recent history of this area has been complicated by competing applications for a forum for the area. Some respondents wrote in support of STRA and therefore did not consider that the Sudbury Town Neighbourhood Forum application should be approved. It is unusual, but not unheard of, for there to be more than one forum proposed for a neighbourhood area.
- 3.3.15 The Act makes it clear in section 61F(7)(b) that a local planning authority may only designate one organisation or body as a neighbourhood forum for each neighbourhood area. National planning practice guidance provides limited advice on what should occur if more than one application for a prospective forum is submitted for the same area. It sets out "...the local planning authority should encourage a dialogue between the applicants in order that they can consider working together as a single neighbourhood forum. The onus is on the prospective neighbourhood forums to be constructive and to reach an agreed solution."
- 3.3.16 The Council via Urban Vision has undertaken actions consistent with national practice guidance, and it has been unable to get an agreed position between STRA and what is now the proposed Sudbury Town Neighbourhood Forum. In this situation the guidance identifies "The local planning authority can then assess each neighbourhood forum application against the conditions for designation and evaluate each application in light of the factors set out in section 61F(5) and section 61F(7) of the Town and Country Planning Act 1990 Act."

- 3.3.17 A period of more than 6 weeks has passed since the decision letter was received by STRA for the refusal of their application for neighbourhood forum status. As a planning related decision captured by the Town and Country Planning Act 1990, it is according to the Civil Procedure Rules and Practice Directions Part 54.4 Judicial Review and Statutory Review provisions, subject to a 6-week limit for such challenges. It is unlikely that a judicial review would now be accepted by the courts due to the passage of time. As such, the Council is able to consider the only outstanding application for the Sudbury neighbourhood area made by the Sudbury Town Neighbourhood Forum.

### **Options**

- 3.3.18 There are three options reasonably considered to be open to the Council. These are to:
- a) approve the designation without any changes,
  - b) approved the designation subject to changes being implemented, or
  - c) not to approve the designation.

#### **Option a) approve the designation**

- 3.3.19 As a valid application consistent with the minimum requirements set out within the Act and regulations has been submitted, this is recommended. The consultation responses have been overwhelmingly positive and indicate a strong desire for a forum to represent the area. Given the Localism Act and other legislation and guidance, there is a clear expectation that where possible, forums should play an active role in representing their communities. Although there has been some support for STRA shown in this consultation, in the context of the overall level of responses it is very limited. This gives some confidence that the community has effectively 'moved on' and that the proposed forum is unlikely to not be supported in its legitimacy and actions by the local community. Officers have a good relationship with the representatives of the prospective forum. Their collaborative working with Urban Vision indicates a desire to have good working relationships with those they engage with, an openness and a willingness to be represent the whole community as best as possible.
- 3.3.20 Given the recent history associated with getting a forum to represent Sudbury, in the initial phases at least, officers will engage with and have oversight of the forum's activities more than might have occurred with other forums. Legislation does, however, allow for the Council to remove a forum's status where it considers it is no longer consistent with the statutory requirements that enabled its designation.
- 3.3.21 On this basis it is considered this is the best option.

#### **Option b) approve the designation subject to changes being implemented**



- 3.3.22 As a valid application consistent with the minimum requirements set out within the Act and regulations has been submitted and the consultation has raised no issues that indicate changes are required, this is not recommended.

### **Option c) to not approve the designation**

- 3.3.23 As a valid application consistent with the minimum requirements set out within the Act and regulations has been submitted and the consultation has raised no significant issues, this is not recommended. There is an expectation that where communities seek to be represented by a valid forum that approval can be given within a timely manner.

## **4.0 Stakeholder and ward member consultation and engagement**

- 4.1 This is set out above in consultation process.

## **5.0 Financial Considerations**

- 5.1 It is not anticipated that making the recommended decision will result in any immediate budgetary impacts. Engagement with and support of the forum will be accommodated within existing revenue budgets. Any financial commitments arising from the forum in the future will be subject to separate approval. The designation of a forum does not have any impact on the split between neighbourhood (25%) and strategic CIL (75%) that currently applies within this area.

## **6.0 Legal Considerations**

- 6.1 The legal process has been highlighted within the body of this report. Neighbourhood Planning (General) Regulations 2012 sets out the process for approving the designation of the neighbourhood Forum.

## **7.0 Equity, Diversity & Inclusion (EDI) Considerations**

- 7.1 The Equality Act 2010 introduced a new public sector equality duty under section 149. It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Council must, in exercising its functions, have “due regard” to the need to:
1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
  2. Advance equality of opportunity between people who share a protected characteristic and those who do not.
  3. Foster good relations between people who share a protected characteristic and those who do not.
- 7.2 The neighbourhood forum membership would be expected to be as representative as possible of the diversity of the local population it represents.

The Council has sought evidence that statutory tests have been complied with and is of the opinion that membership is representative.

## **8.0 Climate Change and Environmental Considerations**

- 8.1 None directly relevant to this decision. Neighbourhood forums can progress neighbourhood plans which might set out policies or neighbourhood development orders that impact on climate or environmental considerations. Any such work would be subject to Council scrutiny and decision-making with any such impacts likely to be subject to Strategic Environmental Assessment where significant impacts might be anticipated.

## **9.0 Communication Considerations**

- 9.1 As indicated, the decision is likely to be publicised in accordance with the methods set out in 3.3.9. Engagement will occur with the communications team regarding any wider social media items/ press releases.

### **Report sign off:**

**Alice Lester**

Interim Corporate Director of Communities and  
Regeneration

## Appendix A: Sudbury Town Neighbourhood Forum Consultation. Representations received, officer summary and responses

Representor	Officer summary	Officer response	Recommendation
No name/ identifier 1	Do not support. The Council ignored the work of the previous forum from 2017-2023 regarding planning decisions, and therefore the designation is pointless.	It is not the case that the Council ignored the previous forum. There have been occasions, such as the refusal of the Pocket Living scheme where the Council has issued a decision broadly consistent with STRA's stated position. The Council put forward a strong case in defending the decision, which ultimately an Inspector agreed with, in dismissing the appeal. It is acknowledged that the Council has also permitted development against the wishes of the Forum. On such occasions there are clear reasons that set out STRA's objections and how they were weighed up in the planning balance to deliver the decision made.	No change
Resident 1	Support the designation. I think it's great to enable local people to have a voice in the development of their area.	Noted.	No change
No name/ identifier	Support the designation. We need to have a Forum to help with the Neighbourhood Plan.	Noted.	No change
Through the Looking Glass Hairdressers	Support the designation. We need a forum to help us work together to build a mixed community where views regarding development can be heard, especially given the number of high rise blocks and HMOs, and the importance of green space.	Noted.	No change
Resident 2	Support the designation. To be kept informed and not to become just part of high rise Wembley.	Noted.	No change
Resident 3	Support the designation. It helps the local community voice the things which are important to them.	Noted.	No change
Resident 4	Support	Noted.	No change

Representor	Officer summary	Officer response	Recommendation
Resident 5	Generally supportive, but the constitution notes that you need to sign a form/apply on their website in order to demonstrate eligibility to join, although there does not appear to be a website. Neither can I find any minutes from their AGM. This needs to be addressed if they are to be designated.	Sudbury Town are not yet a designated Neighbourhood Forum. Once they are fully recognised by the Council, they would be expected to operate in accordance with their written constitution. At 7.1 of their constitution it identifies that the Forum will maintain a web site. At 6.2 it identifies that minutes from meetings, including the Annual General Meeting, will be posted on said website within 2 weeks of the meeting taking place.	No change
Resident 6	Support the designation, as I did the previous Forum which unfortunately failed. I support the principle of a forum to help voice local views. I was disappointed that the Barham Park application was granted against Neighbourhood Plan policy which although overwhelmingly voted for by local residents, appears to have been given little weight. Local residents know best when it comes to their area, and hopefully this new forum will bring forward a more beneficial relationship between the residents and the Council.	Noted. The reasons for the decision to approve that application were set out by the Council, which on balance, notwithstanding the objection from local residents/ groups, was considered acceptable.	No change
Resident 7	Support the designation as I think it is good to have a say in local matters.	Noted.	No change
Resident 8	Support the designation to preserve the voice of residents in our neighbourhood.	Noted.	No change
Resident 9	Support the designation as the Forum is very active and compassionate in dealing with matters raised by local residents.	Noted.	No change
Resident 10	Support the designation as it is a "go to" for residents of Sudbury Town when it is difficult to get in touch with the Council, particularly for senior citizens and those less able.	Noted.	No change
Resident 11	Support	Noted.	No change
Resident 12	Support	Noted.	No change
Resident 13	Support	Noted.	No change
Resident 14	Support	Noted.	No change
Resident 15	Support the designation as the Forum gives local residents a voice to assist in achieving positive change.	Noted.	No change
Resident 16	Support	Noted.	No change

Representor	Officer summary	Officer response	Recommendation
Resident 17	Support	Noted.	No change
Resident 18	Support the designation as it helps residents improve the local area.	Noted.	No change
Resident 19	Support the designation as it provides local residents with a voice for local matters.	Noted.	No change
Resident 20	Support the designation as it allows me to have a say in the local community.	Noted.	No change
Resident 21	Support the designation as it allows people to have a say in the local community.	Noted.	No change
Resident 22	Support	Noted.	No change
Resident 23	Support the designation as it allows people to have a say in the local community.	Noted.	No change
Resident 24	Support the designation as it helps improve the area.	Noted.	No change
Resident 25	Support	Noted.	No change
Resident 26	Support	Noted.	No change
Resident 27	Support the designation as it helps me become a part of local decision making.	Noted.	No change
Resident 28	Support the designation as I want to take part in community discussions regarding things that affect us all.	Noted.	No change
Resident 29	Support	Noted.	No change
Resident 30	Support the designation as I want to keep in touch with local planning works.	Noted.	No change
Resident 31	Support the designation as I am happy to have a say in what happens in the forum area.	Noted.	No change
Resident 32	Support the designation as I agree that residents have a say in their local area.	Noted.	No change
Resident 33	Support the designation as I would like to have a neighbourhood Forum in my ward.	Noted.	No change
Resident 34	Support the designation as it allows local residents to voice their concerns to the Council as a group. This allows dialogue with the Council and Met Police on matters such as planning development, litter, crime, and other issues.	Noted.	No change

Representor	Officer summary	Officer response	Recommendation
Satguru Travel And Tourism Limited	Support	Noted.	No change
Satguru Travel Ltd	Support	Noted.	No change
Resident 35	Support the designation as residents need a voice in our community.	Noted.	No change
Resident 36	Support the designation as we need more community involvement in local planning and other issues facing Sudbury.	Noted.	No change
Resident 37	Support the designation as I agree that people should have a voice in what happens in the local area.	Noted.	No change
Resident 38	Support the designation as residents need to be involved and consulted about what is planned to happen in the area where they live and work.	Noted.	No change
Resident 39	Support	Noted.	No change
Resident 40	Support the designation as local people should have a say on the local area.	Noted.	No change
Resident 41	Support the designation as the needs of this area, community and residents are not covered by other forums.	Noted.	No change
Resident 42	Support the designation to promote and improve the social, economic and environmental wellbeing of the Neighbourhood Area.	Noted.	No change
No name/ identifier 2	Support the designation as we need to stop the high rises, not all areas need them and are suitable for them	Noted. The Forum can seek to take forward policies that might address this matter. Any such policies would have to be justified and consistent with national, London and strategic local policies.	No change

Representor	Officer summary	Officer response	Recommendation
Resident 43	Support the designation as I don't want to see more buildings knocked down for new multi story flats. There is no space for all these people in this small town.	Noted. The forum area is subject to a housing target set within the Local Plan. This was added at the request of the Planning Inspectors who examined the Local Plan. This target was consistent with the capacity anticipated through site allocations and the London Plan's small site delivery assumptions. As such, the forum will ideally proactively plan to accommodate this target, or if this is not possible, at least not undermine this strategic policy target.	No change
Resident 44	Support the designation as the forum will protect us from brent council over populating the area with too many people and housing.	Noted. The forum area is subject to a housing target set within the Local Plan. This was added at the request of the Planning Inspectors who examined the Local Plan. This target was consistent with the capacity anticipated through site allocations and the London Plan's small site delivery assumptions. As such, the forum will ideally proactively plan to accommodate this target, or if this is not possible, at least not undermine this strategic policy target.	No change
Resident 45	Support the designation as I don't want more to see more blocks of flats without parking. The parking problem is already too bad to have more people coming to the area with cars but without parking spaces. Just clean it up and maintain the area.	Noted. Parking standards are set out in strategic policies in the London Plan and Local Plan. These, consistent with national policy are set out as maximums to be provided on site. The standards seek to balance provision according to the development's circumstances and in particular its access to public transport. It should not be assumed that where alternatives are available to reduce reliance on the private car that the Council will nevertheless require maximum on-site standards to be achieved.	No change
Resident 46	Support the designation as we need a forum to help stop Brent over developing and over populating the area.	Noted. The forum area is subject to a housing target set within the Local Plan. This was added at the request of the Planning Inspectors who examined the Local Plan. This target was consistent with the capacity anticipated through site allocations and the London Plan's small site delivery assumptions. As such, the forum will ideally proactively plan to accommodate this target, or if this is not possible, at least not undermine this strategic policy target.	No change



Representor	Officer summary	Officer response	Recommendation
Resident 47	Support the designation as it allows residents to voice their opinions on matters which affect the area, as it will affect their everyday lives.	Noted.	No change
Resident 48	Support the designation as there is currently no formal organisation representing residents on the local authority managed estate on which I live.	Noted.	No change
Resident 49	Support	Noted.	No change
Resident 50	Support the designation as it is good to have citizens involvement in planning.	Noted.	No change
Barham Village Residents Association	Support the designation as the Forum allows local residents to take part in decisions which affect them, and ensure outcomes meet local needs. The local demographic is always changing and the forum enables them to participate.	Noted.	No change
Resident 51	Support the designation as It provides a stronger voice to the local residents.	Noted.	No change
No name/ identifier 3	Do not support as there is already an existing Neighbourhood Forum for the area.	Noted. The previous Neighbourhood Forum in the area, STRA, has since lapsed. The most recent application for forum status by STRA was refused by the Council. The Council has to determine this application based on the information submitted and its performance against the statutory tests.	No change
No name/ identifier 4	Do not support as there is already an existing Neighbourhood Forum for the area.	Noted. The previous Neighbourhood Forum in the area, STRA, has since lapsed. The most recent application for forum status by STRA was refused by the Council. The Council has to determine this application based on the information submitted and its performance against the statutory tests.	No change
Resident 52	Do not support.	Noted.	No change
V S MOTORS	Support	Noted.	No change
V S MOTORS	Support	Noted.	No change
Resident 53	Support	Noted.	No change
Resident 54	Support	Noted.	No change
Resident 55	Support	Noted.	No change
Resident 56	Support	Noted.	No change

Representor	Officer summary	Officer response	Recommendation
Resident 57	Support the designation as it will allow the community to have a voice in how their neighbourhood should be and develop for the present and the future.	Noted.	No change
Cllr. Teo Benea	Support the designation. Its great to see such a diverse community come together to engage in planning matters and work constructively with the Council to improve the social, economic, and environmental wellbeing of the area. It is important for local residents to have a voice and work with the Council on priorities for how their area will be shaped. Green spaces such as Barham Park are very important for the community, and it is important that they have a say on how they are shaped. The engagement strategy was very effective in reaching all parts of the community. Their constitution is also well put together outlining how the organisation will operate and the clear roles of the elected members. As a local Councillor i have worked with many of the residents involved and have seen their commitment to making Sudbury a nice place for all residents. I look forward to working with them closely.	Noted.	No change
Resident 59	Support the designation if it means Sudbury will improve as a collective forum.	Noted.	No change

Representor	Officer summary	Officer response	Recommendation
Resident 61	Support the designation as it will allow residents to have a say in the future of the area, providing direct contact with the Council who will be obligated to discuss planning and development with us. The community will therefore have a wider say in local issues such as housing, local shops, open spaces, transport, and sustainable growth. It is important for residents to have a voice to protect the local suburban character and heritage of the area. This will allow outcomes to be mutually beneficial for the Council and the area's diverse community.	Noted. A revised Neighbourhood Plan could if suitably evidenced contain policies that relate to the existing character of the area and how this should be considered in planning decisions. It should be noted however that in the national and London context the need for additional homes remains large, Sudbury is well connected and has a very limited number of designations that elevate its built form to have a high degree of protection. Much is likely to remain in strategic policy an area with a higher priority for additional homes.	No change
Resident 62	Support the designation as it will help residents have more say over what development takes place in the area, as we are very concerned over the scale of development and how it impacts local infrastructure.	Noted. It should be noted however that in the national and London context the need for additional homes remains large, Sudbury is well connected and has a very limited number of designations that elevate its built form to have a high degree of protection. Much is likely to remain in strategic policy an area with a higher priority for additional homes.	No change
Resident 63	Support the designation as Sudbury needs an active campaign group to keep an eye on developments.	Noted.	No change
Resident 64	Support the designation I'm a concerned citizen.	Noted.	No change
Resident 65	Support	Noted.	No change
Resident 66	It is important for local resident groups to have a voice in the planning decisions for the area they live in.	Noted. It was unclear if this comment was entered in support of the application and no e-mail address was left to be able to clarify. As the yes/ no option was filled in no, it is assumed it was an argument as to why the forum shouldn't be approved.	No change
Resident 67	Support the designation as we need to protect our green spaces and make sure the council does not build towers on them	Noted. The Council has never indicated that it will be acceptable to build towers on green spaces in Sudbury.	No change
Resident 68	Support	Noted.	No change
Resident 69	Support the designation as the Forum allows people have a say in local matters.	Noted.	No change
Resident 70	Support the designation.	Noted.	No change

Representor	Officer summary	Officer response	Recommendation
No name/ identifier 5	Support the designation as it provides a platform for local views regarding planning and the environment to be heard.	Noted.	No change
Resident 71	Support the designation to enable local control of the area. As the Council have issues with STRA, we should try the new Forum.	Noted.	No change
Resident 72	Support the designation as it's important for local residents to have a say in what's happening in their area. We need to ensure it stays a safe place to live and go out and about.	Noted.	No change
Resident 73	Support the designation.	Noted.	No change
Resident 74	Support	Noted.	No change
Resident 75	Support	Noted.	No change
Resident 76	Support the designation. It is vital that green spaces are preserved. It is important that the Council consults with local people about projects and budget.	Noted.	No change
Sudbury Town Residents' Association	Support. The Sudbury Town Residents' Association plays a crucial role in fostering community engagement and should be granted the next 5 years forum status to effectively advocate for the protection and preservation of Sudbury's invaluable green spaces.	Noted. Clarity has been sought from respondent on whether they still support the forum application as it is not STRA's application. No response received to date.	No change
Resident 41	Support	Noted.	No change
Resident 78	Support	Noted.	No change
Sudbury Town Residential Association	Support the designation. I am interested because I live in area and would like to protect green land.	Noted.	No change
Resident 79	Support	Noted.	No change
Resident 41	Support	Noted.	No change
Resident 81	Support	Noted.	No change
Resident 82	Support	Noted.	No change
Resident 83	Support	Noted.	No change
Resident 84	Support	Noted.	No change
Resident 85	Support	Noted.	No change
Resident 86	Support the designation as I believe local people make better decisions about their local areas than others.	Noted.	No change

Representor	Officer summary	Officer response	Recommendation
Resident 87	Support	Noted.	No change
Resident 87	Support	Noted.	No change
Resident 89	Support	Noted.	No change
Resident 90	Support the designation as I want to safe green space in Sudbury Town	Noted.	No change
Sudbury Matters	Support	Noted.	No change
Sudbury matters	Support the designation as we need an organisation to represent sudbury town residents.	Noted.	No change
Resident 91	Support the designation as a measure to support local democracy.	Noted.	No change
Resident 92	Support	Noted.	No change
Resident 93	Support the designation as they have worked very well together for the support.	Noted.	No change
Resident 94	Support	Noted.	No change
Resident 95	Support	Noted.	No change
Resident 96	Support	Noted.	No change
Resident 97	Support	Noted.	No change
Resident 98	Support	Noted.	No change
Tui UK	Support	Noted.	No change
Resident 100	Support	Noted.	No change
Resident 101	Support the designation as we have a neighbourhood plan which allows residents to have a say in local matters	Noted. The Neighbourhood Plan remains whether or not there is a forum, nevertheless a forum is likely to advocate for the local community on planning matters and how the community interprets the plans policies.	No change
Resident 102	Support	Noted.	No change
Resident 103	Support the designation as I would like to know what is going on in my area and have a say along with other residents and businesses.	Noted.	No change
Resident 104	Support	Noted.	No change
Resident 105	Support	Noted.	No change
Resident 106	Support	Noted.	No change
Resident 107	Support	Noted.	No change
Resident 108	Support the designation as Sudbury needs a neighbourhood forum.	Noted. Support welcome.	No change

Representor	Officer summary	Officer response	Recommendation
Resident 109	Support	Noted.	No change
Resident 110	Support	Noted.	No change
Resident 111	Support the designation as community involvement is the way forward.	Noted.	No change
Resident 112	Support the designation because as someone with a family I am interested in having a voice and say in planning in the area.	Noted.	No change
Resident 114	Support the designation because as a family living in the area, I want more of a say in planning matters.	Noted.	No change
Resident 115	Support	Noted.	No change
Resident 116	Support	Noted.	No change
Resident 117	Support	Noted.	No change
Historic England	No comment	Noted.	No change
National Highways	No comment	Noted.	No change
Natural England	No comment	Noted.	No change
Transport for London	No comment	Noted.	No change

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## **Appendix B**

12<sup>th</sup> December, 2023

Gerry Ansell  
Head of Planning and Development  
London Borough of Brent  
Civic Centre, Engineers Way  
Wembley HA9 0FJ

### **Sudbury Town Neighbourhood Forum**

Dear Mr Ansell

We are writing to apply for designation as a Neighbourhood Forum under the provisions of the Neighbourhood Planning (General) Regulations 2012.

#### **1. Designation**

We wish to be designated as the new Neighbourhood Forum for Sudbury Town Neighbourhood Area, the neighbourhood area boundary of which the London Borough of Brent (LBB) has been previously approved for Sudbury.

#### **2. Neighbourhood Forum**

- 2.1 It is proposed that the name of the Forum will be Sudbury Town Neighbourhood Forum (STNF, the Forum).
- 2.2 The STNF has been supported by Urban Vision Enterprise CIC in the preparation of the Constitution and this is referred to in the documents accompanying this application letter.
- 2.3 The contact for the application is Christine Harvey – [ttlgonline@me.com](mailto:ttlgonline@me.com)
- 2.4 Attached separately is the list of 21 people who support the application for designation. This list also includes more than 40 people showing widespread support: it includes individual residents from across the STNF area, community representatives and business personnel.
- 2.5 The Forum aims to build strong links with residents, workers and business groups in the Area, as well as the Area's community centres. The aim is to encourage groups to send a representative(s) to Forum meetings and/or receive minutes of meetings.
- 2.6 The STNF is committed to being open, diverse and inclusive as stated in our Constitution. Our Forum's commitment to inclusivity and engagement is detailed in the attached document. This states our methodology for engaging and involving the community in all the Forum's future activities ensuring transparency and collaboration as a positive step for an effective Forum.

Considering the points mentioned above, and with the benefit of the supporting documents provided with this application, it is our clear intention to establish that the Forum's express purpose

is promoting and improving the social, economic and environmental wellbeing of the Area. The Forum also reflects the character of the Area. There is an understanding of the need for sustainable development and progress within the Area, and a comprehension of addressing the challenges stemming from such development.

We hereby submit this application for designation and trust that it will find support from the London Borough of Brent. We look forward to notification of the Council's acceptance of this application and continuing with the next steps in the process.

Christine Harvey

## Appendix C

# Sudbury Town Neighbourhood Forum Constitution

## 1. Name and Area

- 1.1 The name of the Forum is the **Sudbury Town Neighbourhood Forum** (the Forum).
- 1.2 The area for which the Forum will prepare a Neighbourhood Plan is the **Sudbury Town Neighbourhood Area** (the Neighbourhood Area), and is shown on the attached map, Appendix 2.

## 2. Purpose of the Forum

- 2.1 The purposes of the Neighbourhood Forum are:
  - To promote or improve the social, economic and environmental well-being of the area
  - To prepare a future Neighbourhood Plan for the Sudbury Town Neighbourhood Area, to review and update the current made Neighbourhood Plan
  - To enable the participation of all stakeholders, business owners, and community involvement in the Neighbourhood Area in the preparation and production of the Neighbourhood Plan
  - Any other appropriate purpose agreed by the Forum and compatible with its statutory status as a Neighbourhood Forum.

## 3. Functions

- 3.1 The Forum's functions include:
  - To engage with the community, businesses and other stakeholders, to inform any new Neighbourhood Plan
  - To put together a relevant and proportionate evidence base to support planning policies of any new Neighbourhood Plan
  - To invite and receive contributions and raise funds where appropriate to finance the work of the Forum (ensuring that there is no conflict of interests in receiving funding)
  - To publicise and promote the work of the Forum and organise meetings, training courses, engagement events, seminars, and other relevant activities

- To work with groups that have common interests to exchange information, advice and knowledge, including cooperation with other voluntary bodies, charities, residents' bodies and other statutory and non-statutory organisations
- To employ or appoint staff and/or volunteers as necessary to conduct activities to meet the objectives of the Forum
- To use the existing and any future updated or new Neighbourhood Plan policies as a basis for making representations on planning applications and to monitor decisions made by the London Borough of Brent Council (LBB)
- To take any lawful form of action which is necessary to achieve the purpose of the Forum, including taking out any contracts which it may see fit.

## 4. Membership

- 4.1 The Forum will comprise at least 21 individuals who live or work in the Neighbourhood Area or who are elected members. The Forum will ensure compliance with planning legislation, policy, and guidance.
- 4.2 Membership is open to
- (i) individuals who live in the Neighbourhood Area,
  - (ii) individuals who work in the Neighbourhood Area (whether for businesses carried on there or otherwise), and
  - (iii) individuals who are elected members of a county council, district council or London borough council any of whose area falls within the Neighbourhood Area.

All members must meet at least one of the above statutory membership requirements.

- 4.3 Membership will be drawn from different parts of the Neighbourhood Area and different sections of the community in the Neighbourhood Area.
- 4.4 An application form for membership will be prepared (paper and digital versions) for completion by prospective members.
- 4.5 Applications will be checked against the statutory criteria for membership and where these are met, confirmation of membership will be sent to the applicant.
- 4.6 Each member should inform the Secretary of any changes to home address, place of work, and email address.

- 4.7 The Secretary will inform members of termination of membership if any changes of address or circumstances would mean that they no longer meet the statutory requirements for membership.
- 4.8 Resignation from the Forum should be done in writing by email or letter to the Secretary.
- 4.9 There is no fee for membership of the Forum.
- 4.10 Forum members shall respect the principles of equality, fairness, and inclusivity in their interactions with fellow members and the wider community.

## **5 Governance**

- 5.1 The Forum will elect the following officers from its membership at its first meeting following designation and then through an Annual General Meeting (AGM):
  - Chair or co-chairs
  - Vice-chair(s)
  - Treasurer
  - Secretary.
- 5.2 Those wishing to stand for an officer position will need be members of the Forum and give at least 14 working days' notice in writing to the Secretary before the AGM.
- 5.3 The roles of officers are set out in Appendix 1.
- 5.4 In addition to the officers, Forum members may be appointed on an informal basis to lead or support on Forum matters, such as:
  - Administration
  - Web site and social media
  - Community engagement.

## **6 Meetings and Decision-Making**

- 6.1 All Forum members are entitled to participate in meetings and to vote on decisions. Each Forum member has one vote and all decisions at Forum meetings will be made on a show of hands of Forum members who are entitled to vote at the meeting. A member participating in a vote will be personally liable for ensuring that their participation in

the voting process complies with the provisions outlined in this constitution and the Forum's regulatory obligations. No provision of this constitution shall be construed to create joint liability among the Forum members for the consequences of individual voting decisions. Where a Forum member is unable to attend a meeting, arrangements will be made in exceptional circumstances to enable the member to cast their vote.

6.2 Decisions will be minuted by the Secretary or other agreed person and:

- Such minutes will then be circulated to Forum member as soon as possible after the meeting
- Minutes will be checked by Forum officers before being posted to the web site within 2 weeks of a meeting taking place
- Minutes will be presented to the following meeting of the Forum, for agreement.

6.3 Meetings will be held in an open and transparent manner and be open to members of the public. The Forum may call meetings of the members attending in person or virtually as they think fit. Such meetings may be in person or hybrid meetings as the circumstances allow.

6.4 At least three meetings of the Forum will be held each year, one of which will be an AGM.

6.5 The Annual General Meeting will:

- elect the officers of the Forum for the following year
- receive a report from the Secretary on activities that have taken place in the previous year
- receive an annual statement from the Treasurer
- receive an annual membership statement and confirmation that the Forum membership still meets statutory requirements.

6.6 At the Annual General Meeting elections of the Forum officers shall be held on the basis of a show of hands for each candidate by voting members.

6.7 A notice and meeting agenda will be sent to Forum members at least 10 working days before a meeting (notice will be deemed delivered if sent to the member's last notified email or postal address).

6.8 Where arrangements have been made for a meeting to be held virtually or as a hybrid meeting, the notice calling the meeting shall

state that fact and include details of how a Forum member may attend the meeting virtually.

- 6.9 The quorum required to make decisions is 11 or more Forum members. A Forum member shall be deemed to be present by attending either in person or virtually where arrangements for virtual attendance have been made.
- 6.10 The Forum will maintain a register of Forum member interests.
- 6.11 All Forum members must declare any interests, such as memberships of other organisations.
- 6.12 Potential conflicts of interest should be declared (e.g., conflicts of interest could include where a Neighbourhood Plan policy would affect the personal, financial, business or landowning interests of a Forum member).
- 6.13 Forum members will abstain from voting on any matters in which they have a conflict of interest.

## **7 Operational Matters**

- 7.1 The Forum will maintain a web site and an email address.
- 7.2 The web site will provide information on the progress of the Neighbourhood Plan and links to key documentation.
- 7.3 The Forum will use social media, printed media and other methods to raise awareness of the Neighbourhood Plan and to invite people to engage with the preparation of any new Neighbourhood Plan, any update/s and future plan-making processes.
- 7.4 The Forum may set-up committees or working groups as required, including defining roles and any powers (such as the ability to apply for funding) and such arrangements will be agreed by the Forum, as necessary.
- 7.5 The Treasurer will be responsible for financial monitoring and reporting to the Forum.
- 7.6 The bank account will have at least two and not more than three signatories, all of whom should be elected officers, and one of whom shall be the Treasurer.



- 7.7 Any money acquired by the Forum shall be paid into the Forum's bank account or, where required by funders, into an account of a corporate body that has agreed to hold monies on behalf of the Forum.
- 7.8 All funds must be used for the Forum's designated purpose and in accordance with any grant application and grant offer and for no other purpose.
- 7.9 Legitimate expenses may be paid to Forum members, subject to prior approval from the Treasurer.
- 7.10 Expenses claims will need to be made via a form provided and must be accompanied by receipts.

## **8 Duration**

- 8.1 The duration of the Forum is five years from the Forum's date of designation, unless a new redesignation has been granted before this time.
- 8.2 The Neighbourhood Forum may discontinue prior to this date if it is no-longer required, as follows:
- A decision to discontinue would be approved by more than half of the complete membership of the Forum
  - The London Borough of Brent Council (LBB) would then be informed of the vote and requested to de-designate the Forum
  - Any funding would be returned to funding bodies, where it comprises unused grant monies
  - Other money or resources would be given to a suitable organisation set up to continue the work of the Forum or other not-for-profit local organisations, to be agreed by the Forum.

## **9 Amendment to the Constitution**

- 9.1 This constitution may be amended as follows:
- Proposed amendments must be conveyed to the Secretary formally in writing
  - Forum members will review and consult with the London Borough of Brent Council (as the local planning authority) on any such amendment and the outcome of the consultation will be reported to Forum members

- During an Annual General Meeting (AGM) or general meeting, a vote will be conducted only if a quorum is present
- The LBB Council will be informed of any subsequent decision to amend the constitution
- Such amendments will only come into force once the LBB Council has confirmed that the constitution still meets legal requirements.

## **Appendix 1: Roles of Forum Officers**

### **Chair/Vice Chair**

Chairs and Vice Chairs will:

- Provide leadership for the preparation of a new Neighbourhood Plan, ensuring that the Plan is based on proportionate evidence and community and stakeholder engagement
- Chair meetings of the Neighbourhood Forum, ensuring that they are conducted in an orderly, fair and lawful manner, in accordance with this constitution and with the statutory purpose of Neighbourhood Forums and statutory process for preparing Neighbourhood Plans
- Act as a spokesperson and figurehead as appropriate, including in dealings with the local planning authority and external stakeholders
- Agree agendas and key decisions, with the Secretary
- Ensure that the implementation of decisions is clearly assigned and monitored
- Ensure that there is an effective relationship between the Forum and any committees or working groups
- Ensure that Forum meetings and business are conducted in a respectful, constructive and reasonable manner and to address directly any instances of misconduct or complaints.

### **Secretary**

The Secretary will:

- Organise Forum meetings, including the Annual General Meeting (AGM), in accordance with this constitution and the statutory purpose of Neighbourhood Forums and process for Neighbourhood Plans
- Draw up agendas for meetings together with the Chair and Vice Chair
- Maintain records, communicate with members, and ensure the smooth functioning of the Forum's administrative processes
- Ensure that the timing and location of meetings are as inclusive as possible
- Ensure that decisions, actions and key deliberations are adequately and concisely minuted
- Deal with correspondence (letters/emails), working with other officers
- Administer membership applications, working with other officers.

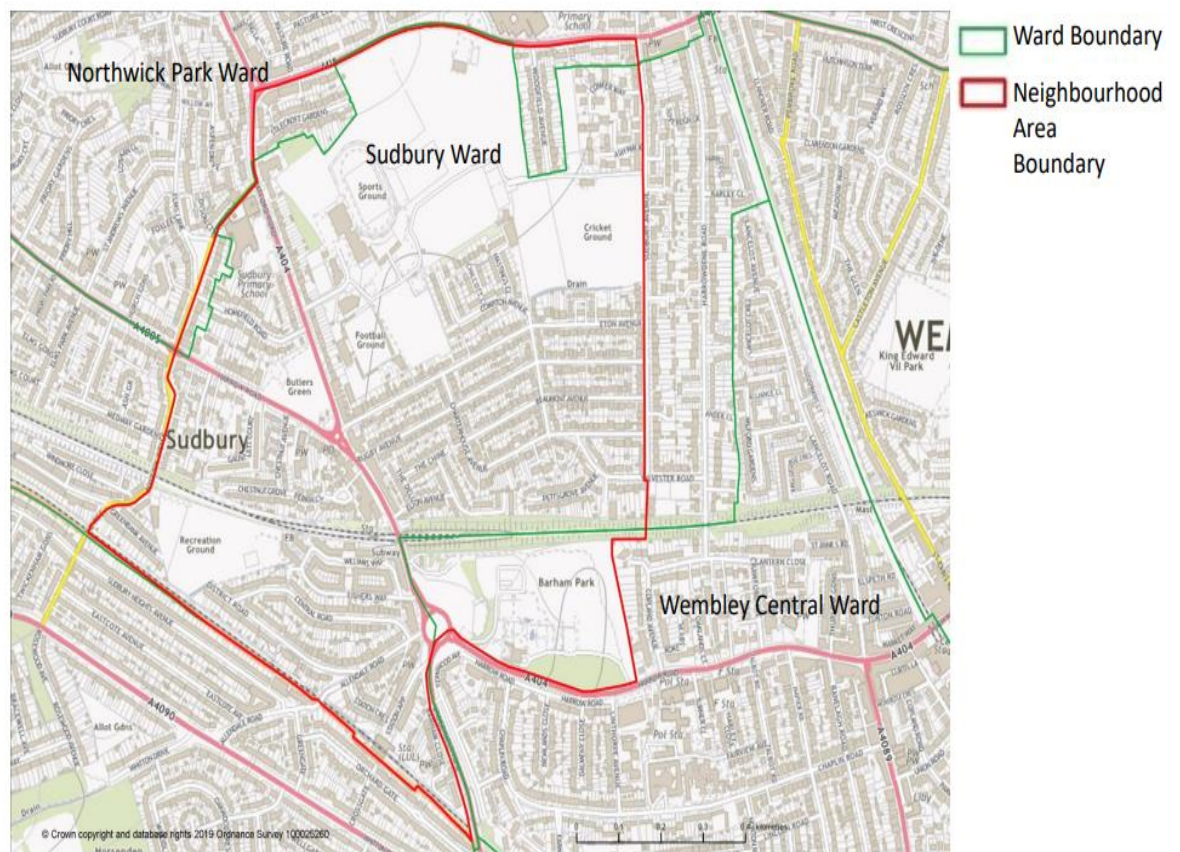
## **Treasurer**

The Treasurer will:

- Maintain the financial affairs of the Forum, ensuring that proper procedures, systems and records are in place
- Oversee the production of necessary financial reports/returns, accounts and audits
- Report on financial matters and accounts to Forum meetings, including the AGM
- Act as a joint signatory on the Forum account, together with any one or two other Forum Officers.

## Appendix 2.

### Map of Sudbury Town Neighbourhood Forum Area (as at August 2023)



## Appendix D

### Sudbury Town Neighbourhood Forum

#### **1. Introduction**

We wish to apply for designation as the new Sudbury Town Neighbourhood Forum (STNF) (the Forum) for the Sudbury Neighbourhood Area.

The Neighbourhood Area (Area) boundary, previously approved by the London Borough of Brent (LBB), encompasses an area within the council ward of Sudbury, along with sections of Northwick Park and Wembley Central wards.

#### **2. Review of Neighbourhood Plan and Potential Updating**

The Neighbourhood Forum's key purpose is to promote and improve the social, economic, and environmental wellbeing of the Neighbourhood Area. The Neighbourhood Forum will be the key focal point for the community to engage with planning related issues affecting the Neighbourhood Area.

The Sudbury Town Neighbourhood Plan needs to be actively applied. The fundamental policies are still applicable as we strongly believe that the Area's community should have a clear voice to help determine local planning initiatives and be at the heart of changes to our neighbourhood. This is even more important with the increased pace and intensity of local development in recent times within Sudbury and the Wards surrounding the Neighbourhood Area.

There is an awareness that the Neighbourhood Plan has areas such as climate changes and environmental / biodiversity which need clearly defined policies. There is also a need to consider future growth in the Area and potential housing and amenity developments. However, mindful of the huge amount of work involved, we have concluded that obtaining designation and establishing a good working relationship with the Council on any development plans for the Area will help to inform any future Neighbourhood Plan.

#### **3. Neighbourhood Forum Area**

The Neighbourhood Area is outlined on the separately attached Appendix 1. It is an area of mixed occupation, namely:

- residential - owner occupied houses and apartments, private rented accommodation, social housing
- businesses - small shops, 'take-a-ways', restaurants, betting shops, licensed premises
- Institutions and places of social amenity – Sudbury Safer Neighbourhood Team, school, nurseries, religious premises, sports facilities, and a local theatre
- Solicitors, law practices
- Residents Associations
- Medical centres – doctor and dentists surgeries.

The Neighbourhood Area has mixed transport and traffic management arrangements which require a co-ordinated and sustainable approach to current and future needs.

Key roads such as the High Street, Watford Road and Harrow Road, along with bus routes connecting the Forum Area to A40/North Circular, Greenford, Harrow, Northwick Park Hospital, Wembley High Street and Stadium, encompass vital transportation links. Rail station links facilitate travel options to Central London and beyond.

Within the Forum Area, Sudbury & Harrow Road Station (Chiltern Line) enables train travel to London or the Midlands, while Sudbury Town Underground Station (Piccadilly Line) allows tube travel in West London to Uxbridge, East London or, via intersection at Acton Town, to all Heathrow Airport Terminals.

Outside the Forum Area, local bus routes allow access to alternative train and tube line travel from Harrow, North Wembley, Wembley Central and Wembley Park stations.

To ensure the efficiency of this extensive connectivity, there is a crucial need to ensure that traffic management arrangements cater to the diverse requirements of all users, including residents (able-bodied and disabled), pedestrians, cyclists, businesses, visitors and commuters.

The Neighbourhood Area has very mixed demographics. Whilst the Area does not cover the whole of Sudbury Ward, the Area's community reflects the demographics of the 2021 Census data:

- 24.4% White, 50.5% Asian, 13.2% Black, and 11.9% mixed, multiple or other ethnic groups
- Age distribution - 22.4% aged 0-17years, 67.2% 18-64years and 10.4% aged 65+ years
- Predominant religions - 33% Christian, 30.1% Hindu and 19.9% Muslim
- Languages - 42% of households had a main language other than English. 9% could not speak English well or at all
- Households - 47% of households were owner occupied, 13% in social rented housing and 40% were in private rented/other accommodation. 22.9% were showing as 'over crowded' under Occupancy (bedrooms).

The Neighbourhood Area has several green spaces, one of which is the historic Barham Park. Barham Park is a Site of Importance for Nature Conservation, and it is defined as an area of Local Green Space. The recent Covid pandemic highlighted the importance of green spaces for mental health, general wellbeing and recreational space. The value these open spaces provide through eco diversity, wildlife and tree cover adds to the need to protect and enhance these sites.

The Forum will be aiming to reach out to as many people as possible within the Neighbourhood Area. The Forum will keep them informed of development plans within the Area and current projects / activity, providing a Forum where their voices are being heard and their views are being included within the Neighbourhood Plan, together with collaboration and dialogue with LBB.



Membership and all our meetings will be open to anyone living or working in the area. While the Forum will be a non-political body, it receives support from the elected ward council members representing the Forum Area Wards all of whom will be invited to attend meetings.

#### **4. Constitution**

A copy of the Sudbury Town Neighbourhood Forum Constitution is attached separately - Appendix 2. This document has been drafted with the support of Urban Vision Enterprise CIC.

#### **5. Membership of the Forum**

The Forum has a diverse group of residents, community organisations, businesses to support the Forum and some of whom are already involved with community and/or business activities. A list of members with names and postcodes is attached separately - Appendix 3.

We also have the support of the following Ward Councillors who are all members of the Forum:

- Sudbury – Cllr Teo Benea and Cllr Paul Lorber
- Wembley Central – Cllr Rajan-Seelan, Cllr Sonia Shah, Cllr Ketan Sheth
- Northwick Park – Cllr Narinder Bajwa, Cllr Diana Collymore.

Forum membership will remain accessible to all residents, employees and businesses within the Area. We are committed to welcoming as many members as possible to encourage inclusivity and community engagement.

#### **6. Engagement Strategy**

The Forum's proposed engagement and involvement strategy includes a multi-layered approach, namely:

- create and develop a communications strategy which will reach as many of the diverse sections of the community as possible
- increase a basic understanding and community awareness of the planning process
- create meaningful opportunities for sustained participation in the Neighbourhood Forum and local planning issues as they arise
- create a desire, ability and aspiration to be involved in planning decisions
- conduct regular Forum Meetings which will inform the current Neighbourhood Plan and also during all stages of any updates to or new Neighbourhood Plan to ensure compliance of regulatory requirements
- consider how to protect green spaces and a shared community engagement to bring environmental benefits to the area

- continue to engage a strong representative network of member partners which include local individual residents, community organisations, tenants/resident groups, members of the retail and business community, local and adjoining ward councillors, and London Borough of Brent planning officers
- monitor post planning application construction management forums and agreements
- conduct workshops and focus groups at venues around the Neighbourhood Area;
- organise talks & presentations at various community venues
- distribute newsletters and leaflets
- utilise the Forum website and other social media to share information
- conduct Neighbourhood Area Walkabouts
- engage in door-to-door outreach across the Neighbourhood Area.

Having a constructive strategy is vital for the Forum to demonstrate effectively to our community and potential participants that their views will be heard and valued within the Forum's activities. Our initial engagement with stakeholders has laid the foundation, and we are committed to building and strengthening this engagement going forward.

## **APPENDIX E**


### **MEMBERS - SUDBURY TOWN NEIGHBOURHOOD FORUM (Post Codes)**

<b>Surname</b>	<b>Post Code</b>
<b>Ahmed</b>	<b>HA0 3</b>
<b>Beirne-Francis</b>	<b>HA0 3</b>
<b>Carroll</b>	<b>HA0 3</b>
<b>Clarke</b>	<b>HA0 2</b>
<b>De-Renzie-Brett</b>	<b>HA0 2</b>
<b>D'Mello</b>	<b>HA0 3</b>
<b>Grewall</b>	<b>HA0 2</b>
<b>Grover</b>	<b>HA0 3</b>
<b>Harvey</b>	<b>HA0 3</b>
<b>Kaur Goel</b>	<b>HA0 2</b>
<b>Miller</b>	<b>HA0 2</b>
<b>Murphy</b>	<b>HA0 2</b>
<b>Peacock</b>	<b>HA0 3</b>
<b>Riyat</b>	<b>HA0 3</b>
<b>Soshadarmadon</b>	<b>HA0 2</b>
<b>Vaughan</b>	<b>HA0 3</b>
<b>Cllr Bajwa</b>	<b>Northwick Park</b>
<b>Cllr Benea</b>	<b>Sudbury Ward</b>
<b>Cllr Collymore</b>	<b>Northwick Park</b>
<b>Cllr Lorber</b>	<b>Sudbury Ward</b>
<b>Cllr Seelan</b>	<b>Wembley Central</b>
<b>Cllr Sheth</b>	<b>Wembley Central</b>
Ahmed	HA0 2N
Ahmed	HA0 2N
Ahmed	HA0 3E
Bendif	HA0 3E
Brommage	HA0 2N
Chamberlain BEM	HA0 3E
Chhaniara	HA0 3E
Clonan	HA9 2P
Dearsley	HA0 3A
Desai	HA0 2L
Dielene	HA0 2P
Faal	HA0 3H

Fagyas	HA0 3A
Finavita	HA0 2L
Goel	HA0 3L
Helemi	HA0 3E
Helemi	HA0 3E
Hersi	HA0 2F
Hoda-Benn	HA0 3B
Jallow	HA0 3H
Kakkar	HA0 2L
Kakkar	HA0 2L
Kataria	HA0 2L
Khasro	HA0 3E
Khasro	HA0 3E
Khiri	HA0 2L
Kick	HA0 2L
Kotak	HA0 3E
Kotak	HA0 3E
Khan	HA0 2P
Kumar	HA0 2L
Maconall	HA0 2L
McGregor	HA0 3Q
Morris	HA0 2L
Muturi	HA0 2L
Obidna	HA0 2P
Obioha	HA02P
Oveliene	HA0 2P
Patel	HA0 2L
Patel	HA0 3E
Peacock	HA0 3A
Peacock	HA0 3A
Pinto	HA0 2L
Punjabi	HA0 3E
Patel	HA0 3E
Pusey	HA0 3H
Riyat	
Shah	HA0 3E

Shaw	HA0 2P
Singh	HA0 3E
Tailor	HA0 3E
Vaughan	HA0 3B
Zarztlny	HA0 2L

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	<b>Cabinet</b> 8 <sup>th</sup> April 2024
	<b>Report from the Interim Corporate Director of Communities &amp; Regeneration</b>
	<b>Lead Member –Cabinet Member for Regeneration, Planning &amp; Growth (Councillor Tatler)</b>
<b>SCIL request for a new Publicly Accessible Courtyard and new Community Centre in Wembley</b>	
<b>Wards Affected:</b>	Wembley Hill
<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>List of Appendices:</b>	One Appendix 1: Wembley Housing Zone SCIL Images
<b>Background Papers:</b>	None
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	Jonathan Kay, Head of Regeneration 020 8937 2348 <a href="mailto:Jonathan.Kay@brent.gov.uk">Jonathan.Kay@brent.gov.uk</a>

## 1.0 Executive Summary

- 1.1. This report seeks Cabinet approval for up to £11.23m Strategic Community Infrastructure Levy capital funding to deliver a new publicly accessible courtyard garden and new fully fitted out community centre, including a contribution towards lifetime maintenance costs, as part of the Council's Wembley Housing Zone regeneration.
- 1.2. Cabinet should note that the Wembley Housing Zone development at Cecil Avenue is itself estimated to generate £5.267m Brent Community Infrastructure Levy receipts. Therefore the net additional Community Infrastructure Levy ask to the Council to fund the infrastructure elements of the scheme is up to £5.96m.

## 2.0 Recommendation(s)

- 2.1 That Cabinet approve up to £11.23m Strategic Community Infrastructure Levy to deliver a new publicly accessible courtyard garden and new fully fitted out community centre, including a contribution towards lifetime maintenance costs, as part of the Council's Wembley Housing Zone regeneration.

### **3.0 Detail**

#### **3.1 Cabinet Member Foreword**

- 3.1.1 Working in partnership with Wates Construction and the Mayor of London, Brent Council is delivering on its longstanding commitment to revitalise the eastern stretch of Wembley High Road. This report sets out how we will embed community use at the heart of our regeneration plans for the Wembley Housing Zone, with a landmark £11.23m investment into a publicly accessible courtyard garden, alongside new community facilities. A Labour pledge met to continue using public assets for public good – balancing regeneration projects in the interests of the many in search of a new home, not the few that decry change.
- 3.1.2 The economic regeneration of Wembley is clear for all to see, from the world-class Stadium to the re-developed public realm – thousands more Londoners now also call the area home, and the area is attracting more inward investment than ever before. This has been made possible thanks to long-term public and private partnership, leveraging resources, expertise and crucially, investment. Through the Wembley Housing Zone we have another opportunity to create another powerhouse, driving positive change along Wembley High Road.
- 3.1.3 The housing crisis did not begin yesterday, and it will not finish tomorrow. It is therefore vital that we create plans which respond to the economic drivers as they are not as we wish them to be. We have a moral imperative to do all in our power to build more housing and communities that last long into the future. The regeneration that underpins the Wembley Housing Zone, is exactly that – an effort to build a better Brent, a place where home ownership is a reality, not just a dream. Supply of housing, of all tenures is vital to this, after all in the United Kingdom we have some of the lowest ratios in Europe for housing stock to people. Taken together with the toxic headwinds of inflation, prices are being pushed everywhere and house prices are now at their most unaffordable, relative to earnings since 1876.
- 3.1.4 The successful mixed use regeneration of Cecil Avenue and Ujima House will unlock the link between Wembley Central town centre and the regeneration at Wembley Park. High quality housing led development will deliver new homes, including affordable and larger family homes, workspace for new business and employment growth, highways and public realm improvements.
- 3.1.5 Where new residents arrive, we have a golden opportunity to create truly accessible spaces that allow communities to flourish in the long-term. You will see within the indicative schematics in Appendix A, proposals for public gardens, a public plaza and for children's play facilities too. Redevelopment can equate to public good, delivering vital new social infrastructure that benefits local residents, businesses and the wider the community.
- 3.1.6 A new public courtyard garden will increase access to open space for local people and visitors to the area, supporting community wellbeing and quality of life, as well as provide new play spaces for children of all ages and abilities. A



new fully fitted out community centre will offer local people and community groups' access to space and facilities for community events and activities, supporting social interaction, and sustainable and liveable communities.

- 3.1.7. There will be £5.267m generated in Brent Community Infrastructure Levy receipts from the scheme and therefore the net Community Infrastructure Levy request is up to £5.96m for delivery of vital infrastructure on this priority Council regeneration scheme, including a contribution towards lifetime maintenance costs, to revitalise the eastern stretch of Wembley High Road for the benefit of local residents, businesses and communities.

### **3.2 Contribution to Borough Plan Priorities & Strategic Context**

- 3.2.1 Delivery and provision of the proposed infrastructure will directly contribute to Borough Plan strategic priorities as follows:

*Thriving Communities:* The new community centre will deliver a new facility with public access for local people and community groups for events and activities, located in an area of rapid population growth and identified needs.

*A Healthier Brent:* The new publicly accessible courtyard will provide new open space in an area of deficiency, supporting community wellbeing and quality of life, with play spaces for children of all ages and abilities.

*A Cleaner, Greener Future:* The new publicly accessible courtyard will deliver new planting and trees, increasing the urban greening factor and reducing carbon emissions and the urban heat island effect in the local town centre.

- 3.2.2 Wembley is the borough's largest growth area and a designated Greater London Authority (GLA) Housing Zone, which is accommodating a significant amount of new development. 6,000 new homes have been delivered in the past 5 years, and 15,000 new homes are expected by 2034. Rapid population growth is generating increased need for social infrastructure, at the same time as pressure on existing infrastructure has increased.

- 3.2.3 The Cecil Avenue scheme is located within Wembley Town Centre and an area of open space deficiency. It will support Brent Local Plan Policy BG11 by providing for the lifetime of the redevelopment a new publicly accessible garden courtyard, with spaces for gatherings, recreation and play for children of all ages and abilities. Planting and trees will increase urban greening and help reduce carbon emissions and the effect of extreme heat in the summer. The courtyard garden will be open to the public, but closed at night and on Wembley Stadium event days. Appendix 1 (p1-9) details plans and illustrations of the location and design of the different spaces that will make up the new publicly accessible garden courtyard.

- 3.2.4. Brent's Local Plan also recognises that community spaces are essential to create sustainable and liveable neighbourhoods. Brent Local Plan Policy BSI1 recommends new community facilities be located in town centres and growth areas. Given the scale of development coming forward, Brent's Infrastructure

Delivery Plan identifies the need for 5 new multi-use community facilities in Wembley. The Cecil Avenue scheme has capacity to provide 1 or 2 new community centres, which would open out on to the publicly accessible courtyard. Arrangements for local community groups' access and use of the space will be set out in an approved management plan. Appendix 1 (p10-12) show the location of the potential community spaces outlined in red. Option#1 provides for either the east or west space as community space; Option#2 provides for both the east and west space as community space. More detailed layout and design work for the community space is ongoing.

- 3.2.5 Key strategic policies in Brent's Climate & Ecological Emergency Strategy 2021-2030 and Inclusive Growth Strategy 2019-2040 will also be furthered by the delivery and provision of the proposed infrastructure.

### **3.3 Background**

- 3.3.1. Brent Council in partnership with Wates Construction and the GLA is delivering the Wembley Housing Zone regeneration of council-owned land at Cecil Avenue and Ujima House. Brent's Local Plan allocates these two key sites for mixed use redevelopment, which will unlock the vision to revitalise the eastern stretch of Wembley High Road. Commercial and community uses will create active frontage and link Wembley Central town centre with the regeneration at Wembley Park. High quality housing-led development will deliver 291 new homes, including affordable and larger family homes, and boost town centre footfall and spend. Workspace for business and employment, a new publicly accessible courtyard garden, new community space, highways and public realm improvements, will complete the regeneration. Early works for the approved scheme are underway, which moves forward into construction and delivery.

- 3.3.2 New infrastructure provision underpins the Wembley Housing Zone (WHZ) vision. New infrastructure will ensure that the redevelopment is sustainable and benefits local residents, businesses and communities through the provision of:

- Cecil Avenue publicly accessible courtyard construction and external works
- Cecil Avenue community centre construction to shell and core
- Cecil Avenue community centre fit out

SCIL is sought to pay for the capital costs to design and construct this new infrastructure, together with a maintenance costs allowance for its upkeep.

- 3.3.3 As reported to Cabinet in August 2021, the Council can retain and lease the commercial and community space on the WHZ scheme, or dispose of it for a one-off capital receipt. Requested costs at Appendix 1 present two options, both of which would deliver the publicly accessible courtyard. Option #1 at £7.87m would also designate one flexible community and commercial space for the new community centre. Option #2 at £11.23m would however designate both flexible community and commercial spaces for a larger new community centre. Marketing of the commercial and community spaces will determine the

range of occupiers interested in the WHZ scheme, and on what terms. Whether or not it is in the Council's best interest to pursue Option 1 or Option 2 will depend on market demand and the balance of socioeconomic and financial outputs that can be delivered.

3.3.4 WHZ will also provide the following S278 highways and public realm infrastructure works, to be funded from redevelopment and not from SCIL:

- Access road to adoptable standard transferred to LBB Highways ownership.
- Re-instatement of existing redundant crossover on Cecil Avenue.
- Widening of Wembley High Road transferred to LBB Highways ownership.
- Resurfacing of Wembley High Road and Cecil Avenue footways.
- Planting of 5 street trees on Wembley High Road.
- Provision of bench seating on Wembley High Road.

#### **4.0 Stakeholder and ward member consultation and engagement**

4.1 Cabinet approved the preferred delivery option for the Wembley Housing Zone regeneration in August 2021. The Lead Member for Regeneration, Planning & Growth has been briefed on the proposed allocation of SCIL to deliver the infrastructure elements of the scheme.

4.2 Consultation events were held with residents and local stakeholders, including ward members and local schools, to inform designs for the two planning schemes, which were also subject to statutory planning consultation. A presentation focusing on the publicly accessible areas of the Wembley Housing Zone scheme was given to the Brent Disability Forum March 2024.

#### **5.0 Financial Considerations**

5.1 As outlined in paragraph 3.3.4 the total estimated cost for the new publicly accessible courtyard and new fully fitted out community centre is up to £11.23m. This report seeks approval for an allocation of SCIL of up to £11.23m to fund this spend. Up to £9.03m will be used to cover the capital investment and up to up to £2.2m will be used to provide a contribution towards lifetime maintenance costs of the publically accessible courtyard and community centre. A summary cost breakdown is provided below. The capital costs will be covered within the existing budget for the Wembley Housing Zones development.

<b>Capital Investment Costs</b>	
Publicly Accessible Courtyard	£3,020,159
Community Centre Option #1	£3,309,513
Community Centre Option #2	£6,012,416
<b>Maintenance Costs</b>	
Publicly Accessible Courtyard	£733,820
Community Centre Option #1	£804,126
Community Centre Option #2	£1,460,859
<b>Total Costs</b>	
Publicly Accessible Courtyard	£3,753,979
Community Centre Option #1	£4,113,639
Community Centre Option #2	£7,473,275
<b>Grand Total Costs</b>	
Option #1	£7,867,618
Option #2	£11,227,254

- 5.2 The proposed capital contribution of up to £11.23m SCIL is necessary to deliver the infrastructure elements of the scheme. The Wembley Housing Zone development is itself estimated to generate £5.267m Brent CIL receipts and Wates are liable to pay this sum. Therefore the net additional SCIL ask to the Council to fund the infrastructure elements of the scheme for Option#1 is £2.6m and for Option#2 is £5.96m. The Council has sufficient Strategic CIL reserves to meet this request.

## 6.0 Legal Considerations

- 6.1 The Community Infrastructure Levy is a charge which can be levied by local authorities on new development in their area. It is an important tool for local authorities to use to help them deliver the infrastructure needed to support development in their area. Section 216 of the Planning Act 2008 it to be applied, to supporting development by funding the provision, improvement, replacement, operation or maintenance of infrastructure. The Act provides that “infrastructure” includes—

- (a) roads and other transport facilities,
- (b) flood defences,
- (c) schools and other educational facilities,
- (d) medical facilities,
- (e) sporting and recreational facilities and
- (f) open spaces

- 6.2 The Wembley Housing Zone provision of a new publicly accessible courtyard and a new community centre meets the definition of infrastructure under the Act, and is eligible to be funded from Strategic Community Infrastructure Levy.

## 7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 The WHZ proposals and planning application assessments have been subject to an equalities impact assessment and paid due regard to the Public Sector

Equality Duty. A new publicly accessible courtyard and community centre are integral to the WHZ vision for regeneration and place-making, and will provide social infrastructure to support growth and development in the local area.

- 7.2 Wates Construction are committed to deliver a social value package commensurate with at least 10% of the contract value, including construction supply chain spend with Brent-based SMEs, and training, apprenticeship and employment opportunities for local people from BAME backgrounds.

## **8.0 Climate Change and Environmental Considerations**

- 8.1 The proposals will contribute to the Council's environmental objectives and climate emergency strategy. The new publicly accessible courtyard will increase the urban greening factor through new planting and trees, reducing carbon emissions and the urban heat island effect in the local town centre. The community centre must achieve an excellent rating under the Building Research Establishment Assessment Method certification for non-domestic buildings, to ensure high standards of sustainable design and construction.

## **9.0 Human Resources/Property Considerations (if appropriate)**

- 9.1 Leasing and/or disposal and management arrangements for the retained commercial and community space will need to be agreed moving forward.

## **10.0 Communication Considerations**

- 10.1 The Council and Wates will issue communications reporting the progress of the WHZ scheme, including scheduled construction works in the local area.

### **Report sign off:**

**ALICE LESTER**

Interim Corporate Director of Communities & Regeneration

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**Appendix 1**  
**WHZ SCIL Images: Publicly Accessible Courtyard & Community Space**

# Site Analysis

## Public Realm and Landscaping Concept



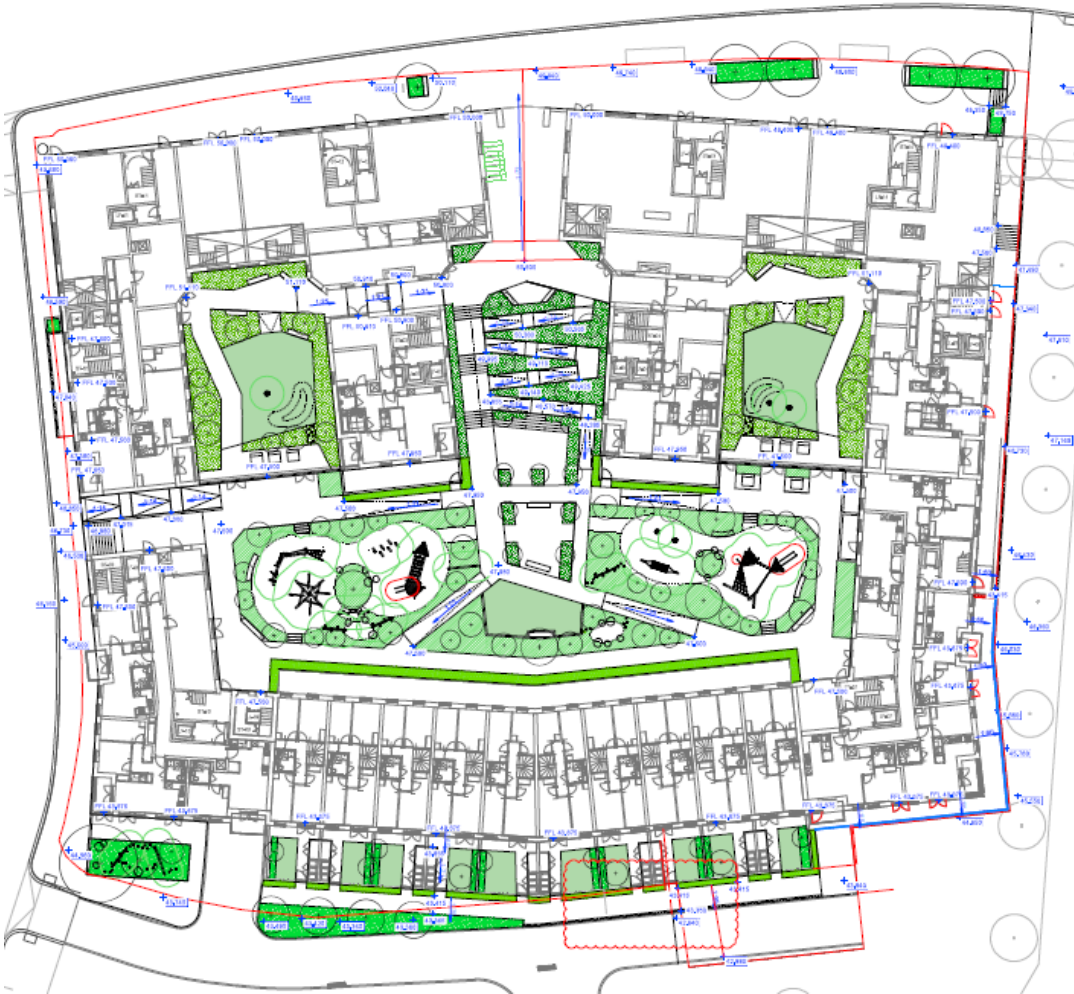
### CONCEPT

Exterior Architecture have created a vibrant proposal for animating the public realm around the buildings, with soft and hard landscaping features.

A hierarchy of pedestrian and public routes provide direct and meandering access between the residential entrances, workspace and community activities connecting Wembley High Road and Cecil Avenue.

There is an ample opportunity to spill out and take advantage of the views across the landscape. To the south, maisonettes with direct southern at grade access and private gardens animate this location.

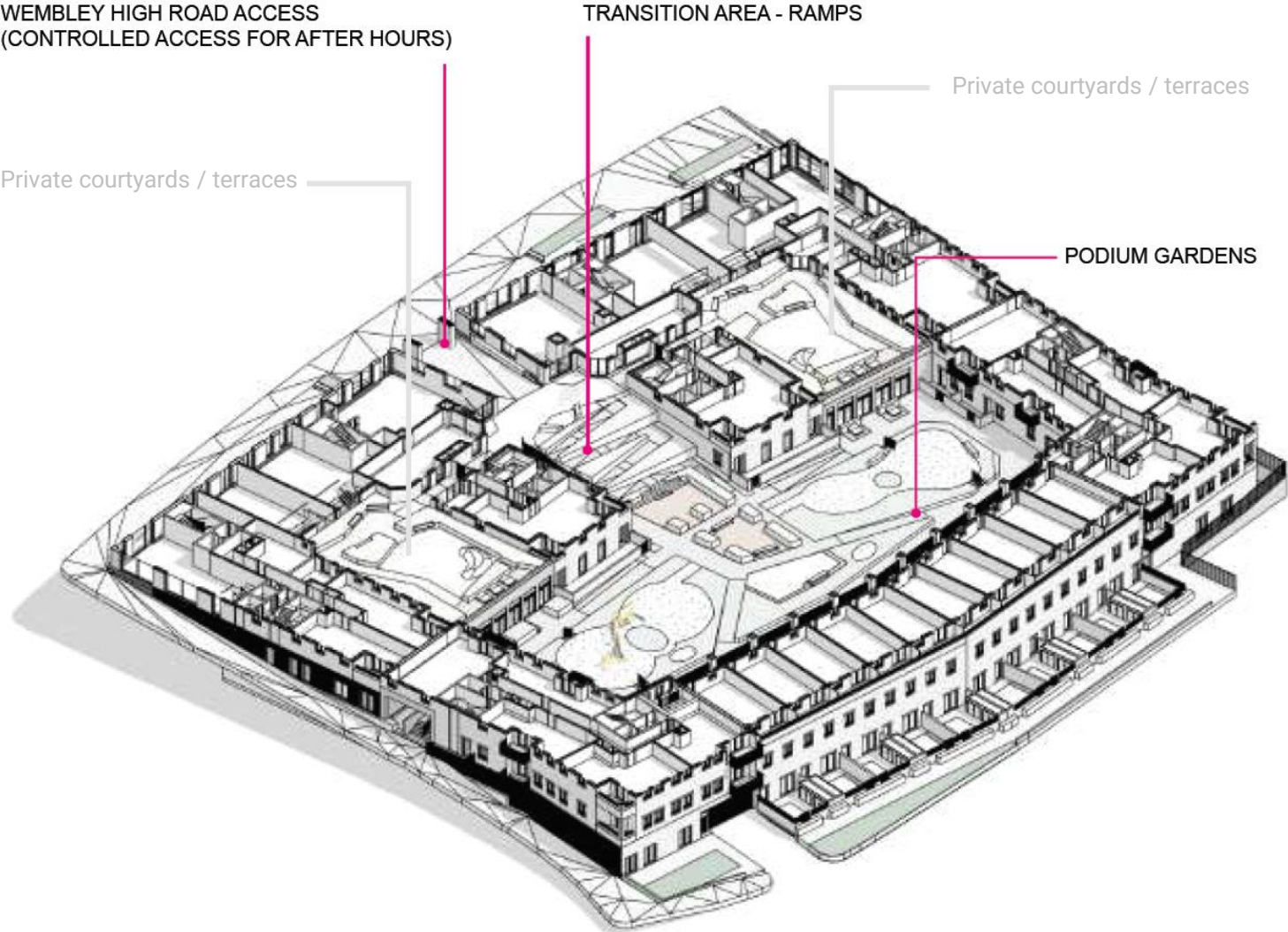
Following receipt of a topographical survey a thorough analysis of the levels and thresholds have been undertaken and this has informed layout and elevations.





# Site Analysis

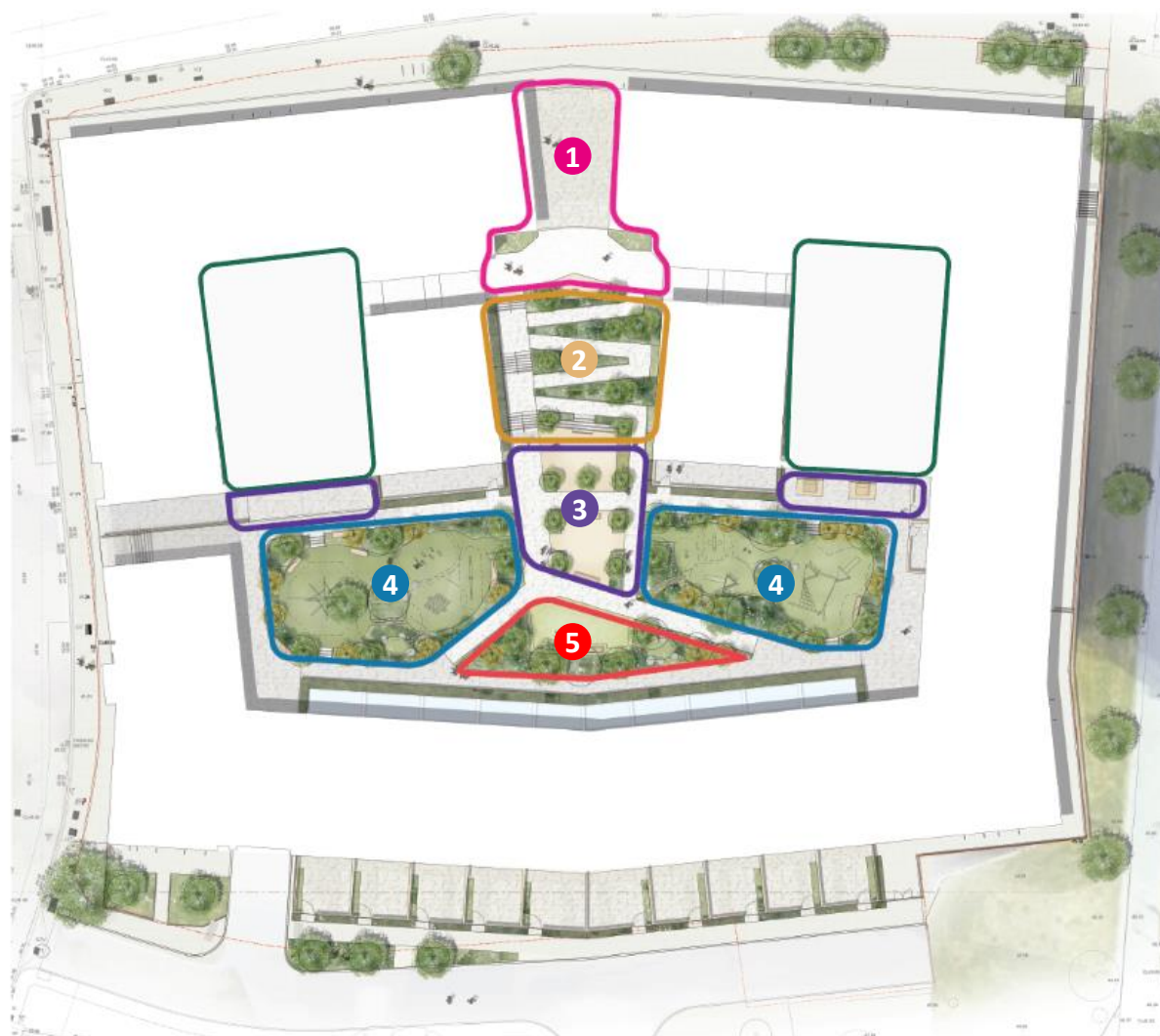
## Public Realm and Landscaping Concept



# Open Spaces

## Character Areas

- 1 **GATEWAY**  
A sheltered space which defines the site entrance and provides views over the podium
- 2 **TRANSITION**  
A well-defined sloped and stepped route to rationalise level-change and provide equitable access to all users
- 3 **PODIUM PLAZA**  
A harder open multi-functional space for gatherings and games, as well as a central distribution area for movement across the site
- 4 **PLAY GLADES**  
Multifunctional play areas surrounded by vegetation with prescriptive equipment for all ages and abilities
- 5 **GREEN GLADE**  
Open lawn area for relaxing and hanging out with 'play along the way' elements embedded in planting







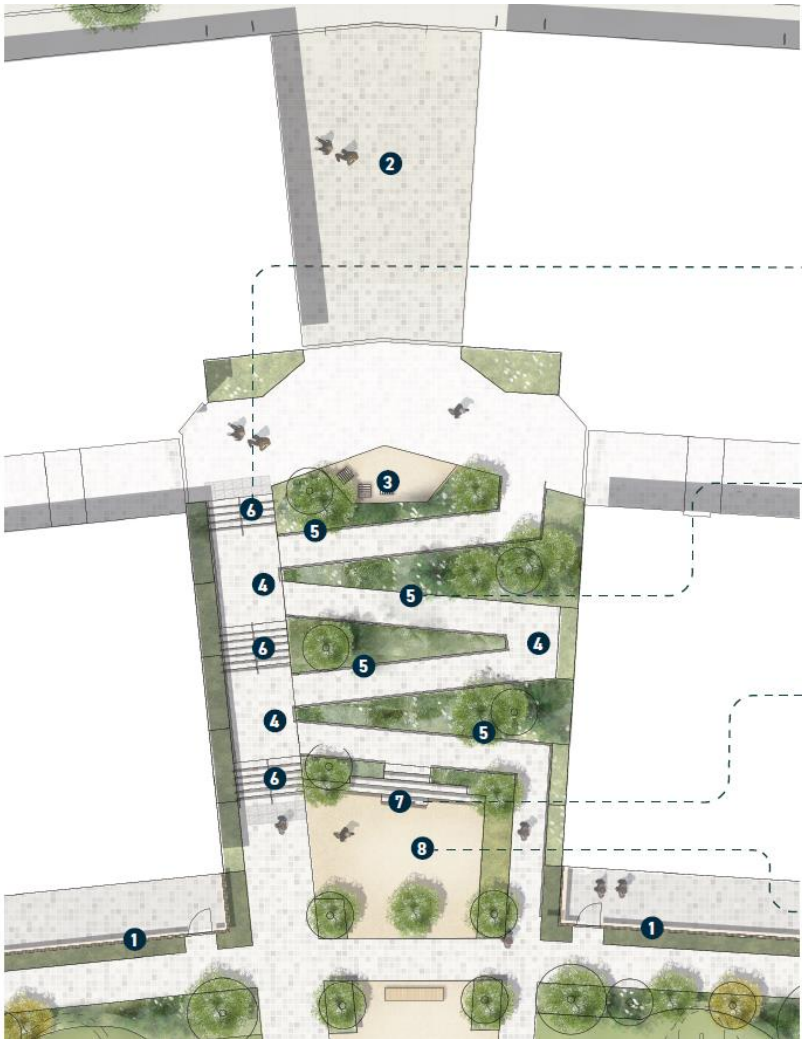
# Detailed Gateway Area

## OBJECTIVES

- A well-defined route to rationalise level-change and provide equitable access to all users;
- Maximise planting and trees to promote urban greening;
- Introduce a consistent green link to Cecil Avenue within the gateway area;
- Provide seating spaces for small groups.

Page 102

- 1 Buffer planting to residential terraces
- 2 Crow's Nest - hardstand area providing core access and views towards podium
- 3 Seat area to terminate view for Cecil Avenue
- 4 1:14 switchback ramped route
- 5 Raised and sloped planting terraces
- 6 Stepped route
- 7 Bleacher seating to rationalise level change and provide seating opportunities
- 8 Self-binding gravel plaza for boules/petanque and other games





# Detailed Play Glades

## CONCEPT

The development of the main podium includes a significant increase in urban greening and maximising tree numbers.

The main space has been raised 500mm in height to accommodate the required root zone for trees. The space has been divided into zones that serve different purposes and to cater for a wide variety of ages and group sizes.

This includes:

- A more open multi-functional space for gatherings and games to the centre which also acts as a connection hub
- Twin play glades at either end with prescriptive equipment for all ages and abilities
- A green glade an open lawn area for relaxing and hanging out with 'play on the way' elements embedded in planting

The zones are embedded in verdant planting to help blur the lines between and ensure a soft and natural look and feel.

- 1 Self-binding gravel plaza for boules/petanque and other games
- 2 Open space lawn area for gatherings and relaxing
- 3 Raised planting edge with biodiverse vegetation and trees
- 4 1:21 ramped route to upper podium level
- 5 Stepped route
- 6 Multifunctional play area with prescriptive equipment for all ages and abilities. Play equipment shown indicatively
- 7 Lightwells to residential terraces and maisonette with buffer planting



# Detailed Play Glades

## OBJECTIVES

- Two well-equipped play spaces which provide similar equipment and play typologies as the consented scheme
- Clearly defined connections to building cores and residential entrances
- A central plaza which provides multi-functional spaces for gatherings, events and games
- Provide buffer/defensive planting along podium edges
- Maximise urban greening and introduce a larger variety of trees and tree types



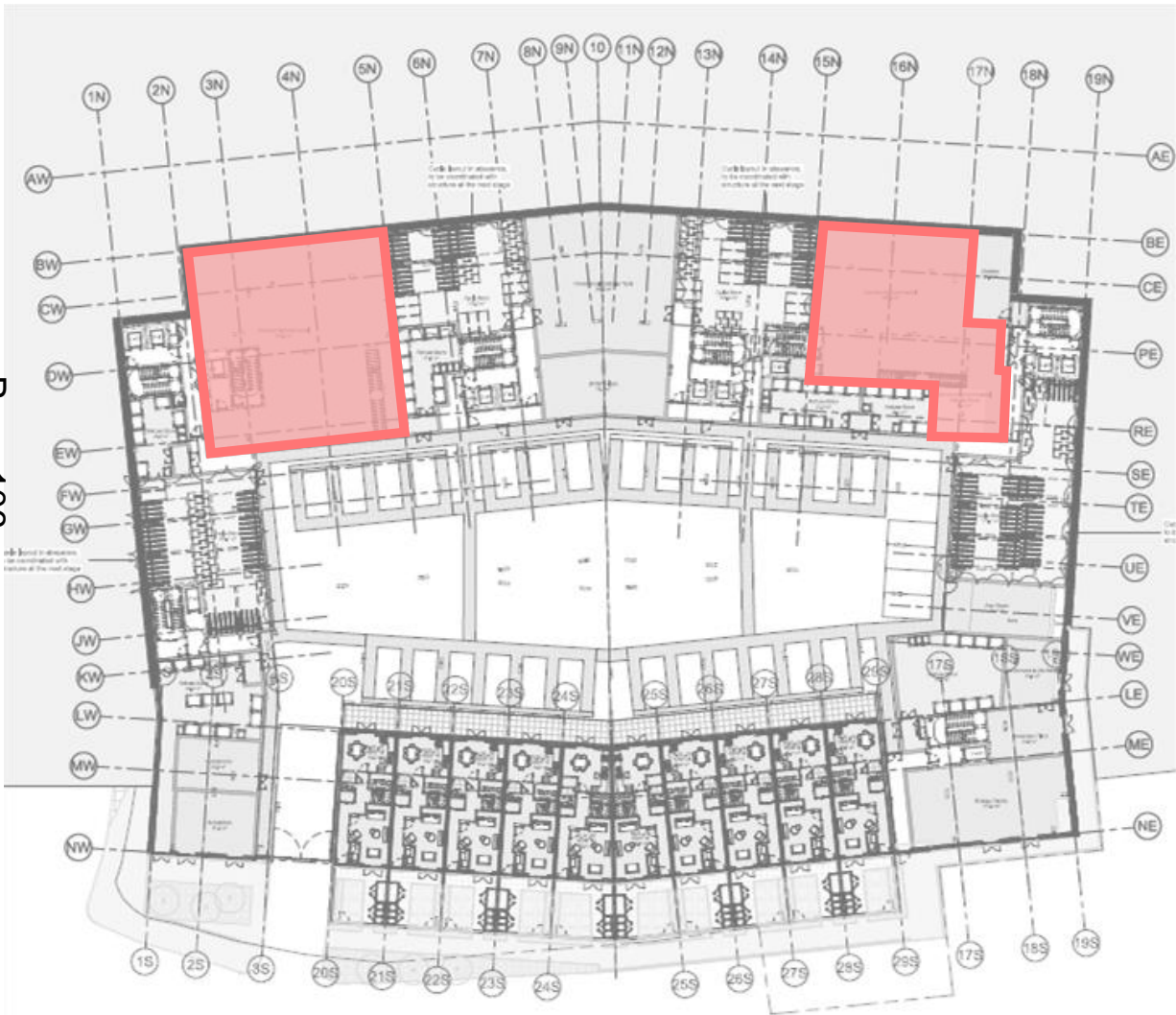






# Proposed Community Spaces

## Basement Level



- ROOM KEY**
- PRIVATE**
- 1B2P
  - 2B3P
  - 2B4P
  - 3B5P
  - 1B2P WCA
  - 2B4P WCA
- AFFORDABLE**
- 1B2P
  - 2B3P
  - 3B4P
  - 3B5P
  - 4B5P M
  - 4B6P M
  - 4B7P M
  - 1B2P WCA
  - 2B3P WCA
  - 4B5P WCA
- COMMUNAL**
- Community Centre and Work Hub Atrium
  - Work Hub
  - Community Centre
  - Cleaner's Store
  - Residential Entrance Lobbies
  - Gardner's Store
  - Housing Management Offices
  - Concierge
- BASEMENT PLANT AND STORE**
- Cycle Store
  - Refuse Store
  - Plant

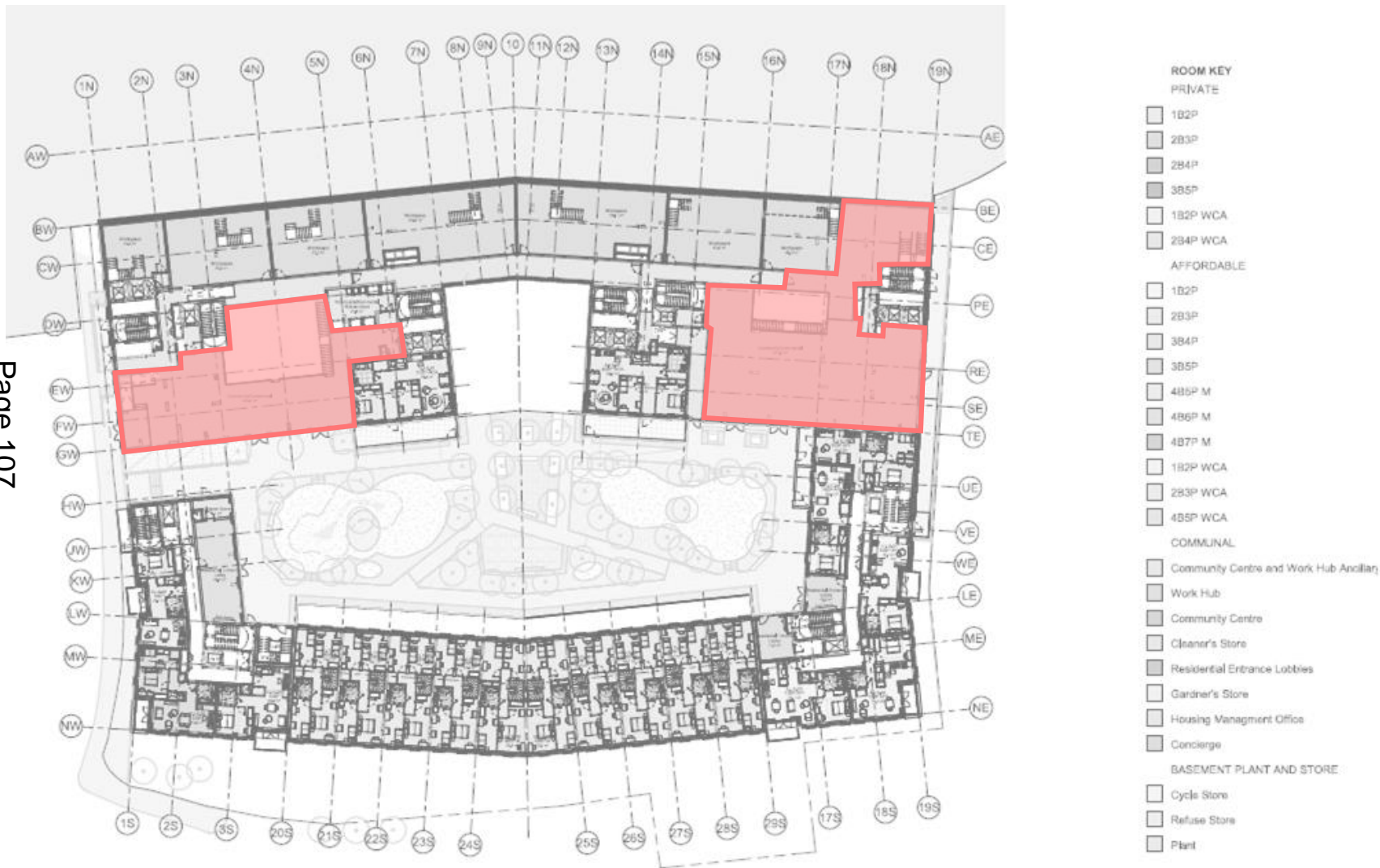




# Proposed Community Spaces

## Lower Ground Level

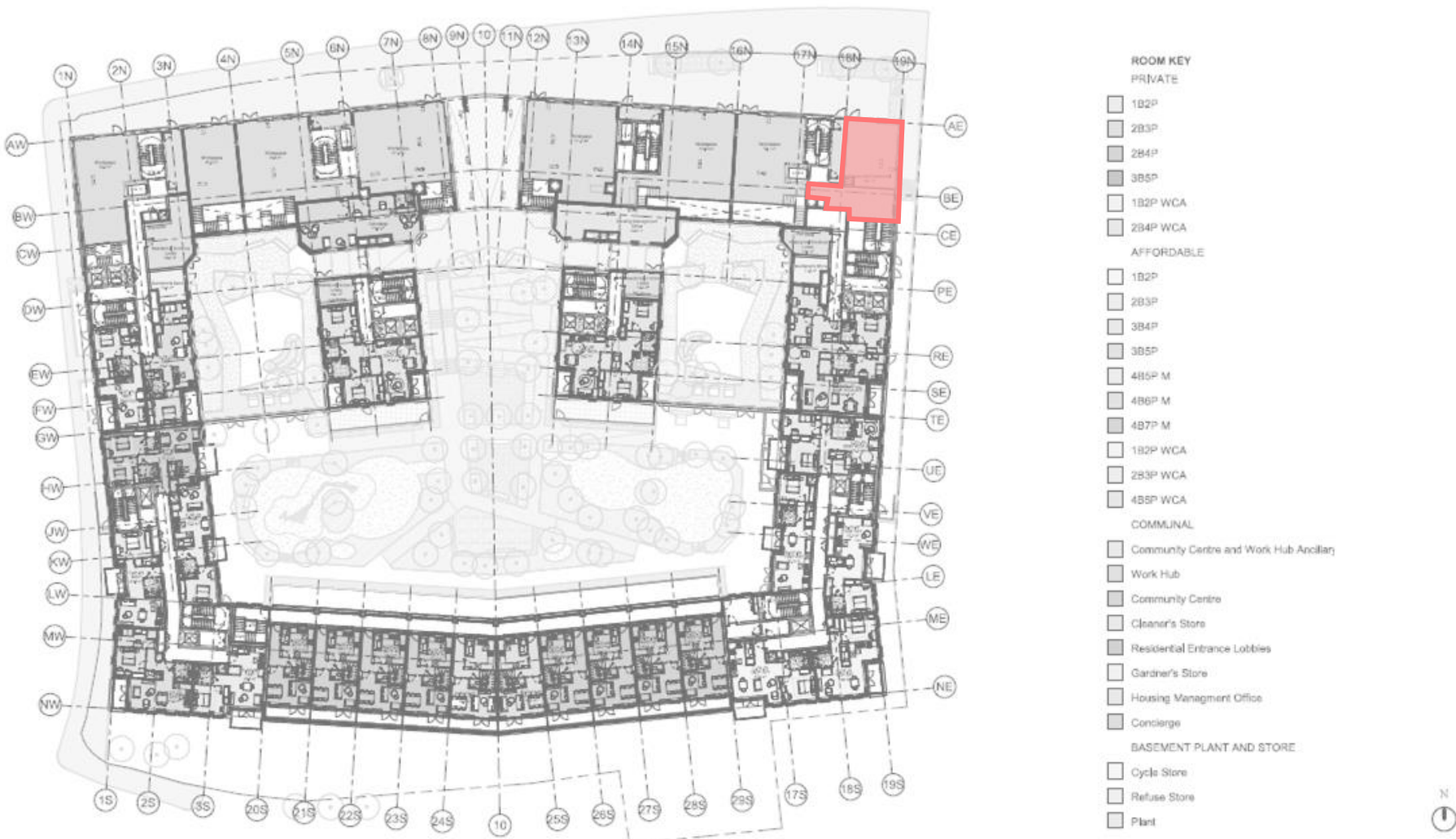
Page 107




# Proposed Community Spaces

## Ground Level

Page 108



	<b>Cabinet</b> 8 April 2024
	<b>Report from the Corporate Director,        Care, Health and Wellbeing</b>
	<b>Lead Member - Cabinet for Public        Health and Social Care        (Councillor Nerva)</b>
<b>Authority to Award the Contract for Children's Public Health        Services 0 - 19 Years (Health Visiting and School Nursing)</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>List of Appendices:</b>	None
<b>Background Papers:</b>	None
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	Marie Mcloughlin Consultant in Public Health 020 8937 6214 <a href="mailto:marie.mcloughlin@brent.gov.uk">marie.mcloughlin@brent.gov.uk</a>

## 1.0 Executive Summary

- 1.1. This reports requests Cabinet approval to award a contract in respect of Children's Public Health 0-19 years (Health Visiting and School Nursing) with Central London Community Health Care NHS Trust pursuant to the Provider Selection Regime. The report summarises the reasons for the request to direct award for 2 years.

## 2.0 Recommendation(s)

That Cabinet:

- 2.1 Approves the pre-tender considerations set out in paragraph 3.5.
- 2.2 Approves the direct award a contract in respect of Children's Public Health Services 0-19 Years (Health Visiting and School Nursing) to the provider Central London Community Health Care NHS Trust for 2 years.

## 3.0 Detail

### **3.1 Cabinet Member Foreword**

- 3.1.1 The Children's Public Health Service 0-19 years (Health Visiting and School Nursing) is provided by Central London Community Healthcare NHS Trust ("CLCH"). It delivers health visiting and school nursing services, the nationally mandated Healthy Child Programme and additional services specified locally by public health including an intensive health visiting service to address health inequalities and healthy weight services. The current contract will expire 30<sup>th</sup> April 2024.
- 3.1.2 The Provider Selection Regime ("PSR") came into effect 1<sup>st</sup> January 2024. The PSR introduced new regulations governing the procurement of health care which support the move from commissioning to the new collaborative arrangements, including the creation of Integrated Health Systems, under the Health and Care Act 2022.
- 3.1.3 This report recommends that a new Children's Public Health Service 0-19 years (Health Visiting and School Nursing) (the "Contract") is directly awarded to CLCH for 2 years using the new PSR.
- 3.1.4 Officers consider that the recommendation to direct award this Contract will contribute to Borough Plan Priorities as follows:
- The Best Start in Life
  - A Healthier Brent
- 3.1.5 The delivery of the Healthy Child Programme promotes nurturing and bonding and underpins healthy development of babies and young children. Health visitors and school nurses play a critical role in safeguarding babies, children and young people. The 0-19 service forms part of the integrated offer of early intervention and prevention for all families from conception to adulthood, delivered through our Family Wellbeing Centres.
- 3.1.6 As a universal and preventive health service, the children's public health service is central to ensuring that "children's physical health, mental health and wellbeing is prioritised" as per the Healthier Brent priority in the Borough Plan. Furthermore, the service delivers targeted interventions, such as the MESCH programme, which specifically address health inequalities. Children's priorities run through the work of the Brent Integrated Care Partnership of which CLCH are a member (with London North West University Healthcare NHS Trust, Central and North West London NHS Foundation Trust, the VCS and the Council).
- 3.1.7 Officers also consider that the recommendation will contribute to the delivery of the Health and Wellbeing Strategy, specifically the commitments to
- Increase the uptake of healthy start vouchers and vitamins.
  - increase the number of children with a healthy weight.
  - Develop the MESCH programme (Maternal Early Childhood Sustained Home-visiting for families at risk of poorer health outcomes).

- Expand the use of our Family Wellbeing Centres.

## **3.2 Background**

- 3.2.1 The Council entered into a contract for 0-19 public health (health visiting and school nursing) with Central London Community Healthcare NHS Trust (CLCH) in June 2017.
- 3.2.2 In the last 2 years, the health and social care landscape has fundamentally changed because of the introduction of the Health and Care Act 2022. The previous commissioning / provider relationships and competitive procurement have been replaced by new duties of collaboration and the creation of Integrated Care Boards (ICBs) which bring together NHS commissioners and providers in sub-regional groupings.
- 3.2.3 The initial 0-19 public health contract with CLCH was due to expire on the 31 March 2022. Officers considered that the contract was one that would be dealt with under the Provider Selection Regime (PSR) which was to be introduced under the Health and Care Act 2022.
- 3.2.4 The PSR governs the procurement of health care services in England by bodies including NHS England, ICBs, NHS Trusts and local authorities. The children's public health service is therefore in scope. The PSR removes the requirement to competitively tender and provides an alternative framework to allow collaboration.
- 3.2.5 There have been significant delays in the introduction of the PSR, as a result of which, continuity of provision of children's public health services has been secured through a number of further extensions of the contract with CLCH to 30<sup>th</sup> April 2024.
- 3.2.6 The PSR was introduced on 1<sup>st</sup> January 2024 and the necessary changes made to the Council Constitution to allow for the procurement of contracts using the PSR provided that advice is sought from the Corporate Director, Law and Governance and the Head of Procurement. Advice has been sought and both the Corporate Director, Governance and the Head of Procurement have confirmed that procurement of the Contract under the PSR is appropriate.

## **3.3 Options**

- 3.3.1 Over the last year officers have scoped options for the continued provision of the children's 0-19 service through exploration of other Councils' and providers' experiences. Three options were considered:
- 3.3.2 Option 1: Open Procurement. Competitive procurement remains an option for health care under the PSR. However, within the new collaborative arrangements many NHS providers have chosen not to compete against each other in competitive procurements. At the same time there has been increasing interest from the private sector. Private providers have secured a number of competitively tendered contracts for children's public health services in London.

While TUPE would apply, experience is that many NHS staff wish to remain in the NHS. Given the national shortage of both health visitors and school nurses, the ability of the private sector to retain and recruit this workforce is concern.

- 3.3.3 Option 2: To bring the service in house. This would require the Council to develop the organisational capacity and expertise to support the safe delivery of a clinical service, for example we would need medicines management, clinical supervision and infection prevention services as well as CQC registration of the service. As the Council does not currently provide any clinical services, developing the necessary infrastructure is likely to entail significant increased cost and risk. The staff are currently on NHS terms and conditions and so transferring to local authority employment would not be attractive.
- 3.3.4 Option 3: To award the contract to the current provider under the PSR. The current provider, CLCH, is an integral part of the Brent ICP, fully committed to delivering the locally health and care system priorities, and embedded in local governance. It is acknowledged that there are issues with the current performance. However, the underlying cause is the challenges recruiting and retaining specialist clinical staff. The current provider is actively addressing this issue and both option 1 and 2 are likely to make it harder to recruit and retain staff.
- 3.3.5 Option 3 is the preferred option. Officers therefore recommend a direct award of the Contract for a term of 2 years to CLCH under the new PSR.

### **3.4 Start for Life**

- 3.4.1 In April 2022, the Government announced the Family Hubs and Start for Life programme, a collaboration between the Department for Education, the Department for Health and Social Care and the Department for Housing, Levelling up and Communities. Through this programme, the Government committed £301.75m for local authorities to deliver start for life and family help services over the next three financial years. Brent Council was one of the 75 local authorities eligible to take part in this programme.
- 3.4.2 Following DHSC approval of the delivery plan submitted by public health, the Council was awarded an additional £1.7 million over 3 years to fund action on infant feeding and perinatal mental health. (Additional funds for the Family Hubs were secured by CYP). The clinical elements of the infant feeding service are currently being delivered by CLCH through a contract variation. These include specialist health visitors and midwives and breast feeding peer support workers. The programme has two more years of funding.
- 3.4.3 A direct award for two years will allow the remaining Start for Life funding and programme to synchronise with the main 0-19 funding and service.

### **3.5 Pre-procurement Considerations**

- 3.5.1 The pre-tender considerations relevant to the Contract are as follows:

Ref.	Requirement	Response	
(i)	The nature of the services / supplies / works.	As detailed above	
(ii)	The value.	£11,980,760	
(iii)	The contract term.	Two years	
(iv)	The tender procedure to be adopted.	Direct Award under the PSR	
(v)	The procurement timetable.	<b>Stage in Procurement</b>	<b>Indicative dates</b>
		Contract start date	1 May 2024
(vi)	The evaluation criteria and process.	Direct Award using the PSR	
(vii)	Any business risks associated with entering the contract.	No specific business risks are considered to be associated with entering into the Contract.	
(viii)	The Council's Best Value duties.	For the reasons set out in Section 3, it is considered that Direct Award will result in the Council achieving best value.	
(ix)	Consideration of Public Services (Social Value) Act 2012	Officers have had regard to the Public Services (Social Value) Act 2012.	
(x)	Any staffing implications, including TUPE and pensions.	There are no implications for Council staff arising from the procurement.	
(xi)	The relevant financial, legal and other considerations.	Financial – See Financial Implications at Section 5.	
		Legal – See Legal Implications at Section 6.	
		Other – N/A	
(xii)	Sustainability	Given the nature and value of the Contract, it is not possible to include specific sustainability requirements.	
(xiii)	Key Performance Indicators / Outcomes	Appropriate Key Performance Indicators / Outcomes will be included in the Contract.	

Ref.	Requirement	Response
(xiv)	London Living Wage	The Contract will require the payment of the London Living Wage.
(xv)	Contract Management	A contract manager will be appointed and appropriate contract management provisions will be included in the Contract.

#### **4.0 Stakeholder and ward member consultation and engagement**

- 4.1 Given the intention to directly award to the incumbent provider under the PSR, it has not been considered appropriate to consult with stakeholders or ward members.

#### **5.0 Financial Considerations**

- 5.1 The total value of the contract is £11,980,760. Split across the two years of the contract, this is an annual cost of £5,990,389. This will be funded by a combination of the Public Health Grant and Start for Life funding (split £5,793,587 and £196,793 respectively).

#### **6.0 Legal Considerations**

- 6.1 As indicated in the body report, the Health and Care Act 2022 introduced a new procurement regime for health contracts from 1 January 2024, namely the PSR. Officers are therefore bound to procure health service under the PSR rather than under the Public Contracts Regulations 2015. Whilst the PSR allows for competitive procurement, for the reasons detailed in Section 3.3, Officers recommend direct award as is permitted under the PSR.
- 6.2 The Council's Contract Standing Order 86(f)(iv) states that subject to complying with the relevant parts of Procurement Legislation, tenders need not be invited for contracts for healthcare services procured in compliance with the PSR provided that advice is sought from the Corporate Director Governance and the Head of Procurement. Both the Corporate Director Governance and the Head of Procurement have confirmed that a direct award under the PSR to CLCH is permissible.

#### **7.0 Equity, Diversity & Inclusion (EDI) Considerations**

- 7.1 The public sector equality duty set out in Section 149 of the Equality Act 2010 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 foster good relations between those who share a protected characteristic and those who do not share that protected characteristic. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.



- 7.2 The proposals in this report have been subject to a screening equality impact assessment and officers believe that there are no adverse equality implications, as the contract covers a number of initiatives and programmes to improve the health and well being for 0-19 year olds.

## **8.0 Climate Change and Environmental Considerations**

- 8.1 The proposals in this report have been subject to screening and officers believe that there are no adverse impacts on the Council's environmental objectives and climate emergency strategy.

## **9.0 Human Resources/Property Considerations (if appropriate)**

- 9.1 This service is currently provided by an external contractor and there are no implications for Council staff arising from the direct award to the incumbent provider.

## **10.0 Communication Considerations**

- 10.1 Given that the recommended award of the Contract is to the incumbent provider, it is not considered that the award of the contract has any direct communication considerations.

### **Report sign off:**

***Rachel Crossley***

Corporate Director, Community Health and Wellbeing

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