



Brent

Cabinet

Monday 17 June 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
Donnelly-Jackson	Cabinet Member for Resident Support & Culture
Farah	Cabinet Member for Public Safety & Partnerships
Grahl	Cabinet Member for Children, Young People & Schools
Knight	Cabinet Member for Housing
Nerva	Cabinet Member for Community Health & Wellbeing
Rubin	Cabinet Member for Employment, Innovation and Climate Action
Krupa Sheth	Cabinet Member for Environment & Enforcement
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

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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 or 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**

1 Apologies for Absence

2 Declarations of Interest

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.

3 Minutes of the Previous Meeting 1 - 10

To approve the minutes of the previous meeting held on Tuesday 28 May 2024 as a correct record.

4 Matters Arising (if any)

To consider any matters arising from the minutes of the previous meeting.

5 Petitions (if any)

To consider any petitions for which notice has been received, in accordance with Standing Order 66. Members are asked to note no petitions are due to be presented at this meeting.

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

To consider any reports referred by either the Community & Wellbeing or Resources & Public Realm Scrutiny Committees.

7 Appointment of Cabinet Sub Committee

To confirm the following appointments to the Barham Park Trust Committee:

Councillor M.Butt (Chair), Mili Patel (Vice-Chair), Donnelly-Jackson, Farah and Krupa Sheth.

Community Health and Wellbeing reports

8. Vale Farm Leisure Centre Procurement Options 11 - 198

This report seeks Cabinet approval to undertake a Tri-borough procurement exercise with Ealing and Harrow, to deliver the leisure service provision at Vale Farm Leisure Centre from September 2025.

Ward Affected: Sudbury
Lead Member: Cabinet Member for Community Health & Wellbeing (Councillor Neil Nerva)
Contact Officer: Sarah Hawken, Health Improvement Manager, Public Health
020 8937 3723
Sarah.Hawken@brent.gov.uk

Neighbourhoods & Regeneration reports

9. Tenant and Leaseholder Engagement Strategy 199 - 232

This report sets out the draft Tenant and Leaseholder Engagement Strategy and supporting Building Safety Engagement Strategy, both of which are required to fulfil the obligations of Social Housing landlords as per the Regulator for Social Housing Consumer Standards and Building Safety Act (2022), with approval being sought to formally adopt both strategies, following a process of consultation and engagement.

Ward Affected: All Wards
Lead Member: Cabinet Member for Housing (Councillor Promise Knight)
Contact Officer: Emily-Rae Baines, Head of Affordable Housing and Partnerships
Tel: 020 8937 1131
Emily-Rae.Baines@brent.gov.uk

Partnerships, Housing and Resident Services reports

10 Private Sector Housing Strategy 2024-2029 233 - 266

This report updates on progress with development of the new Private Sector Housing Strategy, including details of the responses received to the recent public consultation carried out on the Strategy for which final approval is now being sought, prior to publication.

(Agenda republished to include Appendix 4 - Equality Impact Assessment on 12 June 2024)

Ward Affected: All Wards
Lead Member: Cabinet Member for Housing (Councillor Promise Knight)
Contact Officer: Triza Handa, Head of Private Housing Services
Tel: 020 8937 4037
Triza.Handa@brent.gov.uk

11 Travel Assistance Policy 267 - 322

This report provides a progress update on development of the new Travel Assistance Policy and includes a summary of the responses received to the recent public consultation carried out with Cabinet approval being sought to the Policy, prior to final publication.

Ward Affected: All Wards
Lead Member(s): Cabinet Member for Environment & Enforcement (Councillor Krupa Sheth) and Cabinet Member for Children, Young People and Schools (Councillor Gwen Grahl)
Contact Officer: Pauline Jones, Head of Strategic Support
pauline.jones@brent.gov.uk

12 Corporate Performance Update - Quarter 4 2023-24

323 - 344

This report and the performance scorecard (Appendix A) sets out the position on the Council's performance in the fourth quarter of 2023/24. The contents of the report and scorecard focus on progress in delivering the priorities and outcomes set out in the Council's Borough Plan 2023-2027: Moving Brent Forward Together.

Ward Affected: All Wards
Lead Member: Cabinet Member for Employment Innovation & Climate Action (Councillor Jake Rubin)
Contact Officer: Jon Cartwright, Head of Change and Customer Insight
Tel: 0202 8937 1742
jonathan.cartwright@brent.gov.uk

13 Exclusion of Press and Public

The following items are not for publication as they relate to the category of exempt information set out below, as specified under Part 1, Schedule 12A of the Local Government Act 1972:

Agenda Item 8: Vale Farm Leisure Centre Procurement Options - Appendix 1 (Vale Farm Sports Building Inspection Report), Appendix 2 (Financial modelling summary), Appendix 3 (Options appraisal) and Appendix 4 (Tri Brough Scoping Report).

These appendices has been classified as exempt under Paragraph 3 of Part 1 Schedule 12A of the Local Government Act 1972, namely: "Information relating to the financial or business affairs of any particular person (including the authority holding that information)"

14 Any other urgent business

Notice of items to be raised under this heading must be given in writing to the Deputy Director Democratic Services or their representative before the meeting in accordance with Standing Order 60.

Date of the next meeting: Monday 15 July 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](#)



LONDON BOROUGH OF BRENT

MINUTES OF THE CABINET

Held in the Conference Hall, Brent Civic Centre on Tuesday 28 May 2024 at
10.00 am

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

Also present: Councillors Chohan and Long.

1. **Apologies for Absence**

Apologies for absence were received from Councillor Jake Rubin (Cabinet Member for Employment, Innovation & Climate Action), Rachel Crossley (Corporate Director Care Health & Wellbeing) with Claudia Brown (Director Adult Social Care) attending as her representative, Nigel Chapman (Corporate Director Children & Young People) with Shirley Parks (Director Education, Partnerships & Strategy) attending as his representative, and Debra Norman (Corporate Director Law & Governance) with Marsha Henry (Deputy Director – Law) attending as her substitute.

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 8 April 2024, be approved as a correct record.

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

None.

5. **Petitions (if any)**

Bobby Moore Bridge Advertising Lease – Seeking support to award a lease for advertising on the parapets of the bridge as opposed to the walls of the subway enabling the heritage tile murals to be placed back on public display.

Councillor Muhammed Butt (as Leader of the Council) welcomed Mr Phillip Grant to the meeting, who had been invited to speak in support of a petition containing 114 signatures requesting that the Council, in making any decision on award of the advertising lease for the Bobby Moore Bridge, consider the option to award the lease only for advertising on the parapets of the bridge rather than on the walls of the subway, to enable the heritage tile murals on the subway walls to be returned to public display. Prior to presenting the petition, Mr Grant advised of a presentation he had submitted (which it was confirmed had been circulated to all members of the

Cabinet in advance of the meeting) detailing why the petitioners felt the murals deserved to be put back on permanent display. Mr Grant then began his presentation by detailing the historic context of the tile murals on the Olympic Way walls, which had been commissioned by the Council to celebrate Wembley's iconic and important role as a major sporting and entertainment venue. He explained that the majority of the murals had not been on public display since 2013 and the Wembley History Society had been involved in a campaign supporting the reinstatement of the murals to public view since 2018 which had resulted in the football mural, with its plaque celebrating the World Cup victory unveiled by Bobby Moore's widow in 1993, being uncovered for display the following year. A further three murals were also placed back on temporary display at the start of Brent's year as London Borough of Culture in 2020, where, Mr Grant pointed out, the Council had acknowledged the tiles as part of Brent's rich heritage. Quintain had subsequently put those murals, located just outside of the subway, back on permanent display in 2022.

Whilst recognising that the tile murals were not subject to formal legal protection, Mr Grant felt that they should be regarded as an important heritage asset with historical and cultural merit. The petitioners therefore commended Option A (as detailed within the report for consideration on award of an advertising lease) as a means of ensuring all residents and visitors to the area would have an opportunity to enjoy the murals as originally intended.

In highlighting Brent's commitment in seeking to value heritage assets, the opportunity was also taken to remind members about the contribution of £17.8m Community Infrastructure Levy (CIL) funding to support the improvements, undertaken by Quintain, that had been made to Olympic Way. These improvements had included the installation of lighting designed for the subway, which was recognised as an important safety requirement, and had led to the installation of the LED advertising panels which Mr Grant highlighted may need to be removed when the current lease expired. In considering potential alternative lighting options, the use of reflected lights using the existing ceramic tiles was highlighted as a possible way of providing a more energy efficient solution and it was hoped that the Council could work with Quintain and their lighting designer to take advantage of that opportunity.

Referring to the social value benefits identified within the Cabinet report, it was felt important to recognise these would need to be provided by the supplier under the new lease regardless of the final option selected. Whilst Option B would provide a higher financial return, it was pointed out that Option A would still guarantee the Council a minimum rent in excess of £90k with the overall financial difference felt to represent less than the cultural, social, educational and heritage value of putting all the murals back on public display. On this basis, Mr Grant ended by urging Cabinet to support the petition and approve Option A as the basis of the advertising lease to be awarded.

In response, Councillor Muhammed Butt (as Leader of the Council) thanked Philip Grant for attending Cabinet in order to ensure the views of those supporting the petition were represented as part of the process in considering the final award of the advertising lease. Councillor Donnelly-Jackson (as Cabinet Member for Resident Services & Culture) also took the opportunity to thank Philip Grant, welcoming the care he continued to demonstrate for the borough's heritage.

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. **Authority to Award Contract for Bobby Moore Bridge Advertising Lease**

Councillor Muhamed Butt (Leader of the Council) introduced a report presenting the outcome of procurement for the Bobby Moore Bridge advertising lease and the two potential options for the basis of awarding the contract.

In introducing the report, Councillor Butt highlighted the opportunities to work with the successful tenderer in order to ensure the work undertaken to generate income through the advertising lease was still able to protect the site in relation to heritage. He also advised Cabinet of the opportunities the contract would provide in relation to the wider financial benefits and contribution towards the site as a gateway to the Wembley complex.

In responding to the points raised under the petition (item 5 above refers), Councillor Butt acknowledged the views expressed, but highlighted the difficult financial situation the Council's found themselves in as a result of austerity and the overall reduction in Central Government funding and the challenges in balancing that against the Council's regeneration ambitions and duty to provide residents with the services they depended on. He advised the Cabinet that this report formed part of the work to ensure that the Council worked with all developers, partners and stakeholders to achieve the best outcomes for the borough and Brent residents.

The Cabinet thanked those involved in the work on this and the residents who had put their views forward and **RESOLVED**, having noted the comments made during the presentation of the petition and the following options presented for consideration in relation to the award of the contract for the Bobby Moore Bridge Advertising Lease:

- Option A – Advertising on the parapet walls of the bridge only where the existing digital screens are located. This will not affect any of the tiled areas.
 - Option B – Advertising on the parapet walls of the bridge, plus the underpass walls excluding the mural with plaque.
- (1) To approve, having taken account of the reasons detailed in paragraph 3.2.6 of the report, the award of contract for the Bobby Moore Bridge Advertising Lease on the basis of Option B (namely advertising on the parapet walls of the bridge, plus the underpass walls excluding the mural with plaque) to Quintain Ltd.
 - (2) To note the minimum guaranteed amount in respect of Option B would generate additional financial return above the required guarantee over the four-year contract period compared with Option A.

- (3) To note in respect of Option B the tiled mural with plaque in honour of Bobby Moore would remain on permanent display inside the underpass framed by the lightboxes.

Following on from the above decision, Philip Grant sought to raise a point of order, which Councillor Muhammed Butt (as Leader of the Council) advised he was not minded to accept on the basis of Mr Grant already having had the opportunity to address the meeting when presenting the petition.

8. **Brent Household Support Fund 2024**

Councillor Donnelly-Jackson (Cabinet Member for Resident Services & Culture) introduced a report seeking approval for the allocation and distribution of the Household Support Fund (HSF) extension funding, which would run from 1 April 2024 to 30 September 2024.

In presenting the report, Councillor Donnelly-Jackson explained that the Government's recent Spring Budget had announced, following lobbying, that the Household Support Fund would be renewed from 1 April 2024 until 30 September 2024, with an allocation for Brent of £2.8m.

Having explained the context of the report, Councillor Donnelly-Jackson detailed the proposals for utilising the HSF allocation, including providing support to families currently receiving free school meals during half-terms and the six-week summer holiday period, which would support 10,000 children across Brent. The proposed allocations would also provide Brent's 440 care leavers with vouchers, and support 6,500 disabled households with vouchers towards the cost of food, fuel and household bills. In addition, £200,000 would be allocated to Brent's Credit Union to support households struggling to manage multiple debt, which she pointed out had already supported 306 households from 2020 to 2024 with over £1.1m in interest free loans. In addition, £90,000 would be allocated to community projects by partner organisations such as Advice for Renters and SUFRA. The remainder of the allocation of £1.2m would top up the existing Resident Support Fund which residents could apply to for support with food, energy, water and wider essentials.

In considering the context of the report, Cabinet expressed concern at the lack of communication from central government regarding extension of the HSF beyond September 2024. Members viewed the lack of certainty in being able to forward plan as an ineffective model in addressing the conditions residents found themselves but highlighted that the Council would continue to support the most vulnerable residents in the borough through the Resident Support Fund to ensure that no-one was left behind.

In terms of the proposed allocation of funding, Members were supportive of the approach outlined having noted the commitment to continue to support the most vulnerable households in the borough and reduce the financial burden arising from the cost-of-living crisis.

Officers were thanked for their work in preparing the report and it was **RESOLVED** that Cabinet:

- (1) Note that Brent's allocation for the Household Support Fund (HSF) for the period 1 April 2024 to 30 September 2024 is £2,781,222.28.
- (2) Approves the proposed approach for allocating and distributing the HSF as set out in paragraphs 3.10 to 4.14 of the accompanying report.
- (3) Approves the proposed approach whereby the Corporate Director of Partnerships, Housing & Resident Services, in consultation with the Cabinet Member for Resident Services & Culture, will exercise authority to establish and modify detailed eligibility criteria regarding the Household Support Fund grant scheme as may be necessary, to enable appropriate allocation of funding in accordance with recommendations (2) above.
- (4) Approves the proposed approach whereby the Corporate Director of Partnerships, Housing & Resident Services, in consultation with the Cabinet Member for Resident Services & Culture, has the authority to amend the Council's eligibility criteria during the lifetime of this Household Support Fund extension period if necessary for the reasons detailed in paragraph 3.6 of the accompanying report, subject to the parameters set by the Department for Work and Pensions in its Determination and Guidance.

9. **Review of Brent's Conservation Areas**

Councillor Tatler (Cabinet Member for Regeneration, Planning & Growth) introduced a report seeking approval to make changes to Brent's conservation areas following consultation representations, including de-designation, extension to boundaries and the associated making of and removal of Article 4 Directions.

In introducing the report, Councillor Tatler thanked officers for their work in reviewing conservation areas to ensure Brent had a variety of buildings and architecture across the borough and for the extensive nature of consultation and engagement on the proposals.

In considering the report, Cabinet commended the detailed engagement that had taken place on the review in support of the final proposals and was pleased that some new areas would now have designation and some conservation areas had been extended. Where areas had been de-designated, Cabinet noted that this had been supported by Historic England. Cabinet was of the view that a considered approach had been taken in reviewing the conservation areas, and positive conversations were now taking place with residents around energy conservation to ensure the heritage and culture of the borough was protected whilst also moving forward with energy efficiency technology.

Having noted the commitment to continue to engage residents in this work, the Cabinet **RESOLVED** to approve:

- (1) the designation of the Kensal Rise Conservation Area (as shown on the boundary map Appendix A in the report).
- (2) the extension of the boundary to the Brondesbury Conservation Area, the Harlesden Conservation Area, the Mapesbury Conservation Area, the

- Queen's Park Conservation Area and the Willesden Green Conservation Area (as shown on the boundary maps in Appendix B in the report).
- (3) the reduction to the boundary of the Buck Lane Conservation Area and the de-designation of the Sudbury Cottages Conservation Area (as shown in Appendix C of the report).
 - (4) the removal of Article 4 Directions from the Northwick Circle Conservation Area and the Sudbury Cottages Conservation Area (as shown in Appendix D of the report).
 - (5) the making of immediate or non-immediate Article 4 Directions (as required) as detailed in Appendix E of the report.
 - (6) the accompanying character appraisals for each area replacing the existing appraisals as required (as detailed within Appendix F of the report) subject to any necessary minor changes, such as grammatical errors being addressed.
 - (7) consultation on an extension to the Willesden Green Conservation Area boundary to include 126 to 148 Brondesbury Park and to delegate the decision on whether to confirm to the Corporate Director of Neighbourhoods and Regeneration.

10. **Brent Active Travel Implementation Plan**

Prior to the discussion, Cabinet noted the comments made by Councillor Long, who had requested to speak in relation to the Active Travel Implementation Plan, in order to highlight concerns regarding provision designed specifically to prioritise the safety of pedestrians, particularly those with disabilities, in encouraging walking and not only cycling as an active mode of travel. Highlighting issues relating to street clutter (including street signs, furniture and EV charging points) as well as current operation of the dockless bike scheme and contractor and lack of consultation with the Brent Connect Consultative Forums and Brent Disability Forum, Councillor Long advised she was keen to ensure the Plan was subject to ongoing scrutiny taking account of the safety and needs of pedestrians recognising their contribution towards encouraging more active forms of travel.

Councillor Krupa Sheth (Cabinet Member for Environment and Enforcement) then introduced the report, which provided an update on the development of the Brent Active Travel Implementation Plan 2024-2029 (ATIP) and included details of the feedback received from the recent public consultation and stakeholder engagement exercises on the draft plan. The report proposed some minor additions / changes to be made to strengthen the plan prior to adoption.

In considering the report Cabinet noted that over 650 people from a wide range of locations and backgrounds had been engaged and responded to the consultation, and the Council had listened carefully to that feedback. The plan had identified measures and interventions that would be prioritised by the Council to enable more people to walk and cycle and aimed to address barriers to active travel by making Brent's streets safer and more inclusive for walking and cycling, including improving the quality and visibility of walking and cycling infrastructure and equipping communities with the skills and means to walk and cycle.

In addressing the comments raised by Councillor Long, Councillor Krupa Sheth advised that pedestrians were at the heart of the plan and reminded Cabinet of the additional investment provided on footways and to declutter Brent's streets. She and the Leader had also written to the current operator of the dockless bike scheme (Lime) to express disappointment in the service being provided and advised that the Council was looking to strengthen the Memorandum of Understanding to alleviate the issues being experienced, which also included discussions on a London wide basis and encouraged members to continue reporting any concerns or issues being experienced so they could be addressed.

In considering the report, members emphasised the need to be aware of the context within which the strategy had come forward including the Government's limited approach towards tackling the climate emergency and concerns regarding air quality. Cabinet therefore commended the development of strong policies for active travel and climate action, and particularly highlighted the success of the Council's School Streets Policy which had received positive feedback from local residents and which they felt represented a good example of how different ambitions around behaviour change, climate action and keeping communities on board could be balanced.

As well as the improvements this plan could make to air quality within Brent, members also emphasised the impact this plan would have on increasing overall levels of exercise across the borough, including amongst school-aged children, and were pleased to see those health and wellbeing measures incorporated into the plan. The plan would also help to encourage buying local so would result in improvements to the local economy.

In highlighting the need for appropriate support from TfL, Cabinet heard that officers had regular conversations with TfL to ensure cycle highways were being reviewed, to request safety improvements around junctions, and to encourage investments into roads and pavements to ensure a safe pedestrian environment. Cabinet committed to doing as much as possible within the resources available to support residents in the borough to participate in active travel, including for disabled individuals.

In concluding the discussion, Cabinet thanked those who had taken part in the consultation and, having noted the comments made by Councillor Long in seeking to represent the needs and interest of pedestrians **RESOLVED:**

- (1) To approve:
 - (a) the minor amendments proposed to strengthen the plan following consultation feedback, as detailed within paragraph 3.4 of the report.
 - (b) to adopt the final version of the Active Travel Implementation Plan incorporating the amendments under (a) above, as detailed within Appendix A of the report.
- (2) To note the feedback received and suggestions made by the public and various stakeholders as part of the recent public consultation and stakeholder

engagement exercises on the draft plan, as set out in the Community Consultation Report attached as Appendix B to the report.

11. **Draft Staples Corner Growth Area Masterplan and Design Code Supplementary Planning Document**

Councillor Tatler (Cabinet Member for Regeneration, Planning and Growth) introduced a report which presented the draft Staples Corner Growth Area Masterplan and Design Code Supplementary Planning Document (SCGA Masterplan SPD) for approval for publication and statutory consultation.

In introducing the report, Councillor Tatler highlighted that the Council had launched the Local Plan two years ago, identifying areas of opportunity throughout the borough and showcasing the ambition the Council had for Brent residents. She believed that regeneration was clear to see in every part of the borough, with Staples Corner being no exception, highlighting that it would be delivering on growth, high-quality homes, job creation and would boost infrastructure and community facilities. In presenting the SPD, Councillor Tatler highlighted that the proposals within the Masterplan had been estimated to generate between £1.1m and £2.2m of additional Council tax income per year, which would help to fund services residents heavily relied on with the accompanying business growth also strengthening the areas existing economy and provide space for emerging sectors to open Brent up as an attractive place for investors and future residents.

In considering the report, Cabinet also noted how the SCGA Masterplan SPD had been developed to embed environmental sustainability in the proposals with an innovative energy and sustainability strategy striving to meet the borough's environment commitments. Attention was also drawn to the support provided in relation to delivery of Brent Cross West Station as a means of improving public transport connectivity into central London and beyond.

As a technical amendment to the report, Alice Lester (Corporate Director Neighbourhoods and Regeneration) advised that due to the timescales involved in obtaining the necessary copyright approvals it would not be possible to include the precedent imagery referred to within section 3.2.5 of the report, prior to publication and statutory consultation on the Masterplan.

In welcoming the report, Cabinet were supportive of the ambition included in relation to the securing of new homes as part of the Masterplan and also in relation to the transport infrastructure with additional opportunities identified around the West London Orbital and Neasden Station Development as examples showcasing Brent's ambition.

In commending the work done, particularly with partners and stakeholders, Cabinet **RESOLVED** to approve the draft SCGA Masterplan SPD for publication and statutory consultation, subject to members noting that due to the timescales involved in obtaining the necessary copyright approvals it would not be possible to include the precedent imagery referred to within section 3.2.5 of the report, prior to publication and statutory consultation on the Masterplan.

12. **Outcome of Formal Consultation on School Organisation Proposals for Leopold Primary School in Primary Planning Area 4**

Councillor Grahl (Cabinet Member for Children, Young People and Schools) introduced a report providing a summary of the formal consultation undertaken between February and March 2024 on the proposals to implement a phased closure of the Gwenneth Rickus site of Leopold Primary School.

In introducing the report, Councillor Grahl reminded members of the previous discussions that had taken place at Cabinet regarding the pressures in pupil numbers in Primary Planning Area 4, with these still ongoing, requiring what had been recognised as difficult choices in terms of action to address the associated financial risk and challenges to schools across the wider area. The proposals being presented formed part of a package of different steps designed to ease those pressures and ensure schools remained financially resilient so that they could provide the best education for children in Brent.

In considering the report, Cabinet noted that the Council's priority was to mitigate against the complete closure of schools wherever possible with Leopold Primary School having been expanded onto a second site in 2015 and therefore identified as having flexibility to reduce its size with the least amount of disruption to staff and pupils with the opportunity taken to pay tribute to the school for the work undertaken to develop the site.

Considering the proposed way forward, Councillor Grahl acknowledged the challenges for families and communities involved in these type of school organisational proposals and recognised that Gwenneth Rickus had developed its own distinct identity and was appreciated by the community. In presenting the proposal, however, she highlighted that the measure had been designed to protect schools in the area from further tough decisions and that the hard work and commitment to teaching and learning would have a legacy in the work staff continued to do at the Hawkshead Road campus.

In referring to the consultation responses, Councillor Grahl assured Cabinet that these had been carefully considered and as a result it was planned to enact a phased closure up until September 2027 to minimise disruption and give the school more autonomy about the way the site closure would be managed. The opportunity was also taken to thank the Chair of Governors for their submission, which had been included as Appendix B to the report.

In considering the report and comments, Cabinet highlighted the way in which it was felt the pressures identified had been exacerbated by funding reductions to the education sector and welcomed the sensitive approach taken in relation to pupil place planning and the proposed reduction in pupil numbers presented within the report. Assurance was provided that the options available had been subject to robust challenge and an evidence based approach but acknowledged the anxiety caused as a result and assured Brent residents that these decisions were taken in the interest of all children across Brent.

In thanking Leopold Primary School and the Chair of Governors for their involvement in this process, Cabinet **RESOLVED:**

- (1) To approve the variation of Leopold Primary School's Published Admission Number (PAN) from 120 to 60 from September 2025.

- (2) To approve the phased closure of provision on the Gwenneth Rickus site of Leopold Primary School between September 2025 and the end of July 2027.

13. **Exclusion of Press and Public**


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

14. **Any other urgent business**

There were no items of urgent business.

The meeting ended at 10.50 am

COUNCILLOR MUHAMMED BUTT
Chair

 <p>Brent</p>	<p>Cabinet Meeting 17 June 2024</p>
	<p>Report from the Corporate Director, Community Health & Wellbeing</p>
	<p>Lead Member – Cabinet Member for Community Health & Wellbeing (Councillor Neil Nerva)</p>
<p>Vale Farm Procurement Option</p>	
Wards Affected:	Sudbury
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Part Exempt – Appendices 1, 2, 3 and 4 are exempt as they contain the following category of exempt information as specified in Paragraph 3, Schedule 12A of the Local Government Act 1972, namely: “Information relating to the financial or business affairs of any particular person (including the authority holding that information)”
List of Appendices:	<p>Four:</p> <p>Appendix 1 (exempt): Vale Farm Sports Building Inspection Report</p> <p>Appendix 2 (exempt): Financial modelling summary</p> <p>Appendix 3 (exempt): Options appraisal</p> <p>Appendix 4 (exempt): Tri Brough Scoping Report</p>
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	<p>Sarah Hawken Health Improvement Manager Public Health Sarah.hawken@brent.gov.uk 020 8937 3723</p>

1.0 Executive Summary

- 1.1. This report seeks Cabinet approval to undertake a Tri-borough procurement exercise with Ealing and Harrow, to deliver the leisure service provision at Vale Farm Leisure Centre from September 2025.

2.0 Recommendation(s)

That Cabinet:

- 2.1 Notes that the Council's current Tri-borough contract in respect of Vale Farm Leisure Centre with Sport & Leisure Management Limited (SLM) ends in August 2025.
- 2.2 Approves the undertaking of a Tri-borough procurement with the London Boroughs of Ealing and Harrow to deliver leisure service provision at Vale Farm Leisure Centre, such procurement to be led by the London Borough of Harrow.
- 2.3 Approves the use of the London Borough of Harrow's Contract Standing Orders and Financial Regulations in the procurement of the contract referred to in Recommendation 2.2 above.
- 2.4 Delegate authority to the Corporate Director, Community Health and Wellbeing in consultation with the Lead Member for Community Health and Wellbeing to approve steps in the procurement of the contract referred to in Recommendation 2.2 as are necessary and consistent with the contents of this report.
- 2.5 Notes that following the procurement of the Contract referred to in Recommendation 2.2, Officers will report back to Cabinet to seek approval to award the Contract.

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 Our Leisure Centres contribute to the mental and physical health of our residents. Realising their full potential requires leisure centres to be utilised by the whole community and that services are provided in such a way that those who may not have historically accessed a leisure centre are encouraged to do so.
- 3.1.2 The COVID-19 pandemic, the cost-of-living crisis and the cost of utilities have had a fundamental impact on, and significantly challenged, the operation and financial performance of the sports and leisure sector in general, and therefore also on the council's leisure facilities. The provision of any new Leisure service offer must reflect the changed and more challenging financial context in which the industry and local government is operating.
- 3.1.3 Re-specifying the leisure offer to residents provides much more inclusive opportunities for residents to improve and maintain their physical and mental wellbeing and to cater both for those who already enjoy active leisure and to attract less active or socially isolated residents. This reflects our commitments in the Health and Wellbeing Strategy to create healthy lives and healthy places for Brent residents.

3.2 Background

- 3.2.1 The Council's three Leisure Centres operate under different arrangements with three different operators: Bridge Park Community Leisure Centre is operated in-house and will form part of a larger planned redevelopment; Willesden Leisure Centre is managed under a PFI contract which runs until 2031; Vale Farm Leisure Centre is delivered through a Triborough contract with Harrow and Ealing Councils. Neither the contract / PFI end dates nor the timeline for the redevelopment of Bridge Park CLC align at this moment.
- 3.2.2 Vale Farm Leisure Centre is currently operated by Sports and Leisure Management Ltd (T/A Everyone Active) on behalf of Brent Council. This service is provided as part of an existing Tri-borough agreement with the boroughs of Ealing and Harrow, the initial term of which expired on 31st August 2023.
- 3.2.3 A decision to vary and extend the current contract for one year until 31st August 2024 was approved by the Lead Cabinet Member in October 2022. At the time it was envisaged that this would provide time to consider and implement options for a new service provision. However, after meetings held with colleagues in Ealing and Harrow in early 2023, it became clear that a one-year extension was insufficient to allow a re-procurement of the service on a tri-borough basis.
- 3.2.4 Cabinet Member approval was given, in October 2023, to vary and extend the existing Tri Borough Leisure Contract for Vale Farm Sports Centre by a further year from 1 September 2024 to 31st August 2025. Approvals for the contract extension until August 2025 were sought to allow Brent the time to consider all the different management options. A full options appraisal has been conducted. This considered the options of in housing, the creation of a LATCO (local authority trading company), procurement by Brent alone and Triborough procurement with Ealing and Harrow (Appendix 3). The Triborough procurement is the favoured option in terms of affordability, market testing and service offer.
- 3.2.5 From a financial perspective, Brent has seen clear benefits from the Tri-borough approach which have enabled it to benefit from wider economies of scale although only having one facility within the contract.
- 3.2.6 Being a part of the Tri-borough contract increases the market appeal of the opportunity far beyond what would have been achieved by putting Vale Farm out as a standalone management contract.
- 3.2.7 There have been benefits from a non-financial perspective to the Tri-borough approach around shared contract management and learning/ knowledge sharing across the three boroughs.
- 3.2.8 A larger provider will offer increased opportunities for career development for leisure staff. London living wage compliance will be a requirement of the new contract and commissioners will explore the possibility of an employment charter or standards for leisure staff. The provider will be expected to offer a variety of good employment options for staff including sessional opportunities

for residents seeking to develop portfolio careers in the leisure and sports industries.

3.2.9 The specification for the new service will require the provider to respond to the diversity of Brents' resident with tailored offers for neurodiverse residents and the differently abled and culturally competent provision. A larger provider managing a wider portfolio of services will be expected to offer greater specialisation within its offer.

3.2.10 The Council is developing its vision for active leisure as a means to improve health and address health inequalities. This includes aspirations to a more equitable offer for all residents and all parts of the borough. The provider will be expected to partner with the Council, community and voluntary organisations, sports clubs, and governing bodies (amongst others) in realising this vision.

3.2.11 The Council's two other facilities, Willesden Sports Centre (operated by 1Life under a PFI contract) and Bridge Park Community Leisure Centre (currently run in-house), fall outside of the scope of the current contract. However there is an ambition to align the management of the three facilities in the future. A redeveloped Bridge Park Community Leisure Centre would be a key new leisure asset for the borough going forward. The PFI at Willesden Sports Centre expires in 2031. Officers will explore the possibility of including these two leisure centres in the scope of the Tri-borough contract as options that the Council may exercise at some future time.

3.2.12 Sport England frameworks suggest a minimum contract length of 10 years. Ealing and Harrow are proposing a contract of 10 + 5 years. Officers will explore the potential for a break clause for Brent to facilitate the alignment in 3.2.11.

4.0 Stakeholder and ward member consultation and engagement

4.1 User feedback on the current offer at Vale Farm will be reflected in the specification.

5.0 Financial Considerations

5.1 The extension of the contract that commenced on 1st September contains a reduced management fee of circa £53k per annum. This represent a significant reduction from the £223k that was received annually prior to the first extension. The reduction is predominately attributable to increased costs, estimated increases in utilities costs and inflation.

5.2 A detailed financial analysis has been carried out to estimate future costs of operating the leisure contract. The assessment is predominantly based on the expenditure incurred and income currently received by the existing operator. The Council had also commissioned FMG consulting to review the financial projections (Appendix 2).

- 5.3 The market testing indicates that any future outsourcing will most likely result in no income management fee, albeit a management fee may need to be paid to the operator. The Tri-Borough arrangement is also likely to create an additional annual budget requirement to be included in the Council's Medium-Term Financial Strategy.
- 5.4 The building condition report (appendix 1) suggests that additional investment will be required over the next 10 years to ensure the building remains in a condition to provide high quality leisure services to residents. This cost would remain with the Council, even as part of any outsourcing arrangements.

6.0 Legal Considerations

- 6.1 Section 111 of the Local Government Act 1972 provides powers for a local authority to do anything (whether involving the expenditure, borrowing or lending of money or the acquisition or disposal of any property or rights) which is calculated to facilitate, or is conducive or incidental to, the discharge of any of their function.
- 6.2 In considering any recommendations regard must be had to the Council's obligations to carry out its duties in accordance with the principles of best value - to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness. Under section 3 of the Local Government Act 1999 the Council has a general 'best value' duty to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness. Best Value is a mandatorily relevant consideration, being a positive duty. Best Value consultation is required, under Section 3(2).
- 6.3 The current service provision ends in 2025. Where there is a significant change in service provision envisaged, consultation is required. Consultation must be carried out while proposals are at a formative stage, must give sufficient reasons for proposals and allow adequate time for consideration and response. Given the recommend option is to continue with the tri-borough arrangements, it is not considered that consultation is required.
- 6.4 The Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE) is likely to apply to staff currently employed at Vale Farm Leisure Centre with staff transferring pursuant to TUPE to another provider if SLM is not reappointed.
- 6.5 Officers recommend the re-procurement of an external provider to deliver the service. Such contract is likely to fall within the definition of a 'public services contract' under the Public Contracts Regulations 2015 ('PCR 2015') and is above the procurement threshold for services currently £214,904 (inc. VAT). As such, this procurement will be subject to the full application of the new procurement rules under the new Procurement Act PCR 2023. The contract is also categorised as a high value contract under the Council's contract standing orders and accordingly is subject to the Council's rules for high value contracts,

to include a requirement for Cabinet approval to authorise any procurement and award any contract. Any outsourced service involving the appointment of an alternative provider will involve the transfer of staff currently employed at Vale Farm Leisure Centre pursuant to TUPE.

- 6.6 CSO 85 provides that any collaborative procurement shall comply with the Council's Standing Orders and Financial Regulations unless in the case of a Medium or High Value Contract the agreement of the Cabinet or an individual Cabinet Member is obtained under CSO No 84(a). As the intention is for the London Borough of Harrow to lead the procurement, it would be intended that its Contract Standing Orders and Financial Regulations would be used to procure the Tri-borough contract.
- 6.7 The Tri-borough contract will involve the Council entering a lease with the successful provider. The lease will be tied to the contract and will cease at the same time as the contract.
- 6.8 Under Part 3, paragraph 11 of the Constitution, the Corporate Director, Finance and Resources or the Director of Property and Assets may acquire or dispose of an interest in land or buildings. The restrictions placed upon such acquisitions or disposals are set out in Part 3 paragraphs 11.2, 11.3 and 11.6 of the Constitution.
- 6.9 The Corporate Director, Finance and Resources may acquire or dispose of leases, licences, and easements in respect of land or buildings except where:
- i) the annual rental value (excluding other outgoings) exceeds £250k
 - ii) if acquired or disposed of at a premium the value would, in his or her view, exceed £1m in value or
 - iii) where the leasehold term exceeds 125 years.
- 6.10 The Corporate Director, Finance and Resource should be advised of any disposal or acquisition undertaken by this delegated authority within three months of any transaction.
- 6.11 The Corporate Director, Finance and Resources may not sell or grant any lease or easement, licence or otherwise dispose of any land or buildings unless the consideration received, as confirmed by them is the best that can reasonably be obtained, whether or not the grant, sale or disposal is covered by a general or specific consent from the relevant Secretary of State.
- 6.12 In acquiring, selling or disposing of any land or buildings or granting any lease, licence or easement in respect thereof regard shall be had to any relevant Corporate Standards on property acquisitions, management and disposals.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 The Council must, in the exercise of its functions, have due regard to the need to:

- (a) eliminate discrimination, harassment and victimisation
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it, pursuant to s149 Equality Act 2010. This is known as the Public Sector Equality Duty.

- 7.2 Under the Public Sector Equality Duty, 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 The Public Sector Equality Duty covers the following nine protected characteristics: age, disability, marriage and civil partnership, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 7.4 There is no prescribed way the council must exercise its public sector equality duty but having an adequate evidence base for its decision is necessary.
- 7.5 The proposals in this report have been subject to screening and an equality impact assessment completed. Officers believe that there are no adverse equality implications to any service users with any of the proposals considered at this time.

8.0 Climate Change and Environmental Considerations

- 8.1 The council declared a climate and ecological emergency in 2019 and set out to do all in its gift to become carbon neutral on a borough-wide basis by 2030. The council has subsequently adopted a Climate and Ecological Emergency Strategy (2021-2030) which sets out the council's route map to achieve this aim.
- 8.2 The Climate and Ecological Emergency 2022-24 Delivery Plan set out a specific action to lead by example and '*finalise our plans for the council to achieve net zero carbon emissions from the council's own estate and operations by 2030*'. The options for the sports centre beyond the proposed one-year extension, and any proposed capital maintenance work for the building, should place a strong emphasis on environmental sustainability, thereby contributing to the council's stated aims for buildings which could be considered part of its estate.
- 8.3 The government's Swimming Pool Support Fund (SPSF) provides a total of £60 million to local authorities in England as a support package for public leisure facilities with swimming pools and is split into two phases. Phase II of this fund makes £40m available from the government for capital investment to improve the energy efficiency of public facilities with pools in the medium to long term. The council submitted a bid to this fund and Vale Farm Sports Centre was

included. Unfortunately, due to the high demand for this fund, the bid for Vale Farm was not successful and the money awarded instead to Willesden Sports Centre to allow for the installation of solar panels to improve energy efficiency.

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 re-procurement of the contract to operate the Vale Farm Sports Centre.
- 9.2 Appointment of another contractor would result in the staff of Sports and Leisure Management Ltd transferring to a new contractor pursuant to TUPE. This will require consultation with staff. The intention would be for staff to be paid the London Living Wage.
- 9.3 The building is council owned and therefore a lease termination will automatically apply with Sports and Leisure Management Ltd at the end of August 2025 if no alternative action is taken. As part of any new contract, the Council will enter in a lease with the new provider.

10.0 Communication Considerations

- 10.1 There are no communications considerations to be considered at this time.

Report sign off:

Rachel Crossley

Corporate Director, Community Health & Wellbeing

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	Cabinet 17 June 2024
	Report from the Corporate Director of Neighbourhoods & Regeneration
	Lead Member – Cabinet Member for Housing (Councillor Promise Knight)
Tenant and Leaseholder Engagement Strategy 2024 - 2028	

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
List of Appendices:	Three: Appendix 1: Tenant and Leaseholder Engagement Strategy Appendix 2: Consultation analysis for draft strategy Appendix 3: Building Safety Engagement Strategy
Background Papers:	Regulator for Social Housing (Draft) Consumer Standards Tpas engagement standards
Contact Officer(s): (Name, Title, Contact Details)	Emily-Rae Baines, Head of Affordable Housing and Partnerships 020 8937 1131 Emily-Rae.Baines@brent.gov.uk

1. Executive Summary

- 1.1. This report sets out the draft Tenant and Leaseholder Engagement Strategy and supporting Building Safety Engagement Strategy, both of which are required to fulfil the obligations of Social Housing landlords as per the Regulator for Social Housing Consumer Standards and Building Safety Act (2022).

- 1.2. The report presents final drafts of both documents (Appendix 1 & Appendix 3) plus a summary of the consultation responses received by tenants and leaseholders and seeks approval to formally adopt both strategies.

2. Recommendation(s)

That Cabinet:

- 2.1 Approves the Tenant and Leaseholder Engagement Strategy, presented in Appendix 1.
- 2.2 Notes the feedback from formal consultation on the engagement strategy and how feedback will be used, presented in Appendix 2.
- 2.3 Approves the Building Safety Engagement Strategy, presented in Appendix 3.

3. Cabinet Member Foreword

- 3.1. The Tenant and Leaseholder Engagement Strategy presented in this report has six promises about how we will listen to the people living in Council homes.
- 3.2 In Brent, we support Equality, Diversity, and Inclusion, with the Strategy focussed on protecting those living in social housing.
- 3.3 Listening to Tenants & Leaseholders in development of the strategy has been very important.
- 3.4 Enabling our communities is a desired outcome of the Borough Plan and forms part of the Strategic Priority: Thriving Communities.
- 3.5 Under this desired outcome, the Council commits to introducing and delivering a new Community Engagement Framework. This strategy will feed into this Framework and ensure that the voices of those living in Council homes and on Council estates shape the services that they receive. This strategy will also contribute to capturing residents' experiences of their neighbourhood and communities. Though this strategy is specific to Council tenant and leaseholders, the purpose is to amplify their voices across all themes and priorities within the borough plan, so those living in social housing who are often underrepresented can have their say across Brent.

4. Background

- 4.1. The need and benefit gained by engaging people living in social housing was first acknowledged at a national level following the 1988 Duke of Edinburgh inquiry into social housing.
- 4.2. Since, engagement has taken various forms, featuring in national policy, introducing the Right to Manage, the launch of tenant compacts (2005). Additionally, the national body for maintaining standards within the social housing sector changed, this includes the change from the Tenant Services

Agency to the Homes and Communities Agency in 2011, which was subsequently replaced by Homes England and the Regulator for Social Housing which we now have in place today.

- 4.3. The level of priority tenant engagement was given by social landlords however fluctuated across organisations and followed economic trends, with dedicated engagement teams being reduced as landlords needed to make cuts.
- 4.4. The purpose of setting out this brief history is to highlight that whilst new legislation has been introduced for the social housing sector, specifically the Building Safety Act (2022) and the Social Housing Regulation Act (2023), engagement with tenants has always been seen as a pillar of good practice for social housing landlords.
- 4.5. More recently, tragic events such as the fire at Grenfell Tower and the death of 2-year-old Awaab Ishak because of damp and mould, as ruled by the coroner, has led to critique nationally that engagement with social housing tenants has become a tick box and not empowering tenants to influence the services they receive.
- 4.6. The Building Safety Act (2022) and Social Housing Regulation Act (2023) set to change that. Both pieces of legislation hold at the centre, the need to listen to the views and experiences of tenants and leaseholder whose freeholder is a social housing landlord. These Acts also give greater power to national government bodies to hold social landlords to account.
- 4.7. The Regulator for Social Housing launched consultation in 2023 on a new consumer standard that social landlords will be inspected against. This inspection regime will for the first time, include local authority landlords. The proposed consumer standards replace the 'Tenant Engagement and Empowerment Standard' with a two new standards 'Transparency, Influence and Accountability Standard' and 'The Neighbourhood and Community Standard'.
- 4.8. Within these new standards, there is greater emphasis on treating tenants with respect, acknowledging diversity, and adapting communication styles to meeting this, and working more proactively with tenants to promote social, environmental, and economic wellbeing within their communities and neighbourhoods.
- 4.9. This has created an opportunity to completely overhaul how engagement is delivered.

5. Tenant and Leaseholder Engagement Strategy

- 5.1. The strategy is presented in Appendix 1 and contains six commitments that will be delivered through the course of the strategy. These commitments are the desired outcomes the service seeks to achieve, each commitment is underpinned by a series of actions. Through formal consultation, tenants and leaseholders rightly challenged the language used in the draft strategy, asking

for plain English and less jargon, less corporate language and for it to be shorter. In response, the strategy presented in this Cabinet report has been updated, so that the content can be read and understood by a wide audience. The commitments and actions in the proposed strategy for approval are set out below.

5.2. Commitment One: We have a culture that respects engagement & make changes using your feedback.

How we will do this:

- We will offer various ways for you to get involved and share feedback.
- Achieve the National Engagement Standard set by the tenant engagement support organisation, TPAS.
- Make sure our contractors (repairs) also offer ways you can get involved.
- We will train all new housing staff on engagement and refresh this training annually.
- We will establish a tenant and leaseholder committee to hold the Council accountable.

5.3. Commitment 2 – We will learn from your feedback.

How we will do this:

- We will regularly review feedback and complaints to spot areas for improvement.
- Share learning with housing staff and change our practice using this information.
- Host events each year so you can meet with housing staff and report any issues.
- We will use data to identify neighbourhood priorities and engage with specific estates to understand issues.

5.4. Commitment 3 – We will challenge stigma and make sure you feel included.

How we will do this:

- We will work with you to address any stigma and raise awareness among staff and contractors.
- We will ensure communication is respectful and inclusive.
- Offer training to all housing staff on challenging stigma and stereotypes about people who live in social housing.
- Make community spaces places you feel safe no matter your age, gender, sexuality, religion, ability, race & ethnicity.

5.5. Commitment 4 – We will make sure you influence decisions about the service we provide.

How we will do this:

- We will involve you in decision-making at both the neighbourhood and strategic levels.

- We will compensate you for your time and ensure you are part of assessing bidders and renewing contracts.
- We will work with you if you live in a high-rise block, so you feel safe and have a say on any work we need to carry out.
- Make sure your housing officer regularly inspects your block or estate and invites you and your neighbours to join them.
- Provide you with regular updates on changes to our service and how your feedback has been used.

5.6. Commitment 5 - We will be transparent with you and provide information so you can challenge us.

How we will do this:

- We will regularly share information with you using various channels about our performance.
- We will share the results of any consultation or engagement activity we carry out.
- We will meet with Resident Association representatives every two months (minimum) and present how we have delivered this strategy.
- We will support you in scrutinizing services and presenting findings to senior managers.

5.7. Commitment 6 – We will work with you to make a positive contribution to where you live.

How we will do this:

- We will promote opportunities for you to get involved in community activities.
- We will review community spaces to ensure they are used effectively and safely.
- Help you and your neighbours to apply for funding to run events and activities on your estate or in your community.
- Work with you and our partners like the Police on problems like anti-social behaviour and crime.

6. Tenant and Leaseholder Engagement Strategy Consultation and development of the strategy

6.1. To develop this strategy, the Council engaged a wide range of stakeholders including residents, elected members, consultants and searched for best practice examples.

6.2. In July 2023, a pop-up roadshow was held across 11 estates, a team of engagement officers, the patch housing officer and estate caretaker attended to speak with tenants and leaseholder about the strategy commitments and gather their views. Whilst on site across the 11 estate, 74 actions were captured, ranging from tenants and leaseholder expressing their interest in being more involved, to outstanding repairs, parking queries and tenancy questions.

- 6.3. Holding a summer roadshow will also now become an annual event, specifically to increase visibility and presence on estates.
- 6.4. The draft commitments were also posted on Citizens Lab in August as posted for 6 weeks. A focus group was held with five tenants and leaseholders to have a more detailed discussion about the commitments and proposed actions. Finally, the service also used the staff networks to challenge our approach to engagement and explore how we can ensure our approach encourages tenants and leaseholders representing different ethnicities, sexual orientation, those with a disability to have their say.
- 6.5. Across the feedback captured there were themes identified. The vast majority of those who engaged with the service on the proposed strategic commitments not only supported them but welcomed them as the direction they wish to see the Council operating. There was however an air of caution in the feedback received, with respondents agreeing they are the right areas to focus 'if you can live up to them'. This demonstrates a sense of doubt that the commitments will be followed through by the Council.
- 6.6. The Council then went out to formal consultation on the developed strategy which ran from 16 March 2024 – 10 May 2024. The consultation received 129 responses and the feedback is set out in Appendix 2.
- 6.7. A core theme received from the feedback was the need to simplify the language as stated in point 6.1. In response, a full re-draft of the strategy has now been completed and Appendix 1 is the revised version for approval. Other actions being taken forward include:
- Include upcoming consultation and engagement activity on the website that has been planned for this year (including updating the Council's anti-social behaviour policy and current repairs re-procurement consultation **(target August 2024)**)
 - Publish or share outcomes from all consultations and engagement activities run by the service and include what impact has been made **(introduce from June 2024)**
 - Publish information on how tenants and leaseholders can get involved **(target July 2024)**
 - Produce a specific policy on reasonable adjustments so tenants and leaseholders feel able to have a say regardless of their circumstances **(target October 2024)**
- 6.8. In some of the responses received to our consultation, tenants and leaseholders raised issues directly affecting them. These issues or questions have been extracted from the consultation and will be formally logged as service requests and allocated to the relevant team within the Council. This ensures there is an audit trail for each query and ensures that every issue is resolved or receives the requested information. This will be standard practice going forward.

7. **Building Safety Engagement Strategy**

- 7.1. The Building Safety Act (2022) introduced new requirements for building owners to demonstrate their ability to identify and manage safety risks in 'high risk buildings'. High risk buildings are defined as buildings 18m or more in height OR seven storeys or more and contain at least two flats.
- 7.2. The Act specifically requires landlords to establish an engagement strategy for higher risk buildings outlining how Brent Housing Service will communicate and share information with tenants, leaseholders and their household members and identify their needs regarding building safety.
- 7.3. Appendix 3 presents a copy of the strategy for consideration. Again, this strategy has been reviewed to ensure its content is Plain English. The strategy includes a commitment to holding an annual meeting with every high-risk block that has been registered, this is not something every social landlord is offering.
- 7.4. To inform the content of this strategy, a letter outlining the requirements of the Building Safety Act (2022) and a paper copy of the strategy were sent out to every resident living in a high-risk block. The draft strategy was also published on Citizens Lab. The Council did not receive any feedback on the documents shared but is committed to continuously evolving the approach as the meetings with residents take place and feedback is captured on a more ad-hoc basis.
- 7.5. The first round of Building Safety Engagement Meetings has now been completed for all high-risk blocks. The Council is now seeking feedback from tenants and leaseholders to confirm the best method for sharing information and enabling them to influence decisions being made for their blocks regarding safety. The next round of meetings will start in November 2024. Again, meeting dates will be uploaded to the website and communications issued so there is advance notice of these meetings.

8. Menu of Involvement

- 8.1. A Menu of Involvement has been created to provide a series of options for tenants and leaseholders. The purpose of this Menu is to showcase the various opportunities that we will use to consult, engage, and inform ways of working. The Menu is based of different levels of time and commitment required from tenants and leaseholders. Options under the Menu include:

- Survey participant
- Focus group attendee
- Estate Walk about participant
- Block Champions
- Resident Association member or Committee Member
- Scrutiny panel
- Mystery shopper
- Young Tenant Panel Member
- Home Ownership Panel Member
- Tenant and Leaseholder Engagement Panel Member

- 8.2. Feedback from tenants and leaseholders is also collected informally, through events, roadshows, complaints and compliments received.
- 8.3. Tenants and Leaseholders are invited to express an interest in any of these activities and specify topics they are most interested in. When activities are scheduled, they are then proactively contacted.
- 8.4. To recognise the time and effort volunteered by Tenants and Leaseholders, an Incentives and Rewards policy has been developed, this has been shared with the corporate engagement team to ensure incentives and rewards are aligned within the Council.
- 8.5. It should also be noted that whilst this strategy and menu of involvement has been developed specifically for the purpose of engaging social housing tenants and leaseholders, there is a commitment to work closely with other engagement services and teams in the organisation. This will ensure there is greater consistency in how we engagement, sharing of resources and alignment of priorities overall.

9. Stakeholder and ward member engagement to date

- 9.1. The Affordable Housing and Partnerships service recently completed a re-organisation, combining engagement for the new council homes programme and on behalf of the landlord service. This has increased resources and allowed for more generic officer roles to be created. The new team will be fully recruited by March 2024.
- 9.2. Despite there being limited capacity within the service, there has been engagement with tenants and leaseholders carried out. Examples from 2023/24 include:
 - 9.2.1. **Scrutiny exercise:** 28 complaint responses issued by the Housing Management service were assessed by tenants and leaseholders. Each complaint was scored on:
 - Clarity
 - Empathy and professionalism
 - Whether the response addressed issues in full
 - Whether the outcome was satisfactory
 - Overall rating

The findings from this exercise were presented to all managers of people and those who are responsible for responding to complaints and it will be repeated in Q4.

- 9.2.2. **Action Day:** An action day was organised at Moatfield, a Council owned estate to carry out a large garden clearance. 45 volunteers from across Brent Council, Wates, Langley and Powerday working across the 2 days. We retrieved 2 mattresses, items of clothing, 1 bicycle, bicycle wheels, 1 moped

that had to be cut free from bushes, a safe, a buggy. Approximately 20 tonnes of green waste were removed from the garden over the 2 days. This action day was carried out following engagement with the resident association.

- 9.2.3. **Governance review:** Newman Francis have been commissioned to carry out a full governance review of the 19 Resident Association across Council owned estates plus an additional Resident Groups who had expressed an interest in becoming an Association. This review is due to complete end of February 2024.
- 9.2.4. **Chair of Resident Associations Meeting:** On a monthly basis we meet with all chair's regarding Repairs policy, lettable standard, community grants, impending legislative changes, tenant, and leaseholder engagement strategy.
- 9.2.5. **Building Safety Engagement Pilot Meetings:** Two pilot meetings were held for Lexington and Lodge and Manor Court. These meetings were scheduled in the evening and were face to face, however attendance at these meetings was low from residents. The service is now exploring how to boost attendance including offering online options and issuing building safety specific communications to those living in high-risk blocks.
- 9.2.6. **Housing Ombudsman Event:** An event was held at the Civic Centre on the 17 January where residents were invited to hear from the Housing Ombudsman directly, ask questions and raise queries regarding their own housing. Brent Housing Service Housing Officers were in attendance and spent time after the session meeting with residents to handle queries on a 1:1 basis. This event was well attended.
- 9.2.7. A tenant and leaseholder open day was also held on Thursday 14 March where over 250 tenants and leaseholders attended the Civic Centre to meet with officers from across housing and other Council departments. Feedback from this event was overwhelmingly positive, demonstrating the move towards increased face to face contact is the right strategy for the service.
- 9.3. A new team of community development and engagement officers has now been recruited and has been in place since April 2024. To capture reach and impact of engagement activity being carried out, the Council has introduced two new key performance indicators. These are:
- *Number of engagement interactions undertaken on behalf of the Housing Management Service' - target 1,000*
 - *Number of recommendations made by tenants and leaseholders that have been implemented by the Council.*
- 9.4. For 2024/25, the service has already achieved 483 engagement interactions. Note this is not based on unique participants and tenants and leaseholders can attend multiple events. Activities include workshops, building safety engagement meetings, survey responses, another complaints scrutiny and chair of resident association meetings.

10. Financial Considerations

- 10.1. Housing Service changes in relation to the draft tenants and leaseholder strategy, along with commitments detailed in this report will be delivered within existing approved budgets, which comprises of £0.13m for customer engagement and contribution towards staffing cost.

11. Legal Considerations

- 11.1. On 6 April 2023, the Higher Risk Buildings Regulations 2023 (the 2023 Regulations”) came into force, these regulations implemented s.156 of the Building Act 2022 (“2022 Act”) and require all existing occupied high-risk buildings to be registered from 6 April 2023 and by no later than 1 October 2023 in a register set up by the Building Safety Regulator (“BSR”). Section 77 of the 2022 Act makes it an offence for the building to be occupied without being registered (for which the Principal Accountable Person (“PAP”) will be held liable. The Building Safety Act names the Health and Safety Executive (HSE) as the new Building Safety Regulator (BSR) in England. The 2023 Regulations and the HSE has stated that registration of occupied higher-risk buildings had to be completed before October 2023 to avoid committing an offence. The HSE has said that those who fail to comply will be investigated and may be prosecuted.
- 11.2. The Social Housing (Regulation) Act 2023 (“2023 Act”), which received Royal Assent on 20th July 2023 has introduced a new proactive approach to regulating social housing, ensuring standards are met and taking action against failing landlords. Its aim is to strengthen legislative powers to tackle failing social landlords and to provide better support for tenants living in unsafe homes.
- 11.3. The 2023 Act provides the Regulator with a power to give directions to Registered Providers (RPs), including local authorities, to collect, process and publish information about their performance in relation to the regulatory standards. The Regulator has already consulted on and published the Tenant Satisfaction Measures (TSMs) in April 2023, the Regulator introduced 22 mandatory TSMs creating a new system for assessing how well social housing landlords are doing at providing good quality homes and services, this includes those applicable directly to building safety as well as those based on tenant perception. The requirement on RPs to start collecting data also started from 1st April 2023 and it is anticipated that the first year of data from RPs will be published in Autumn 2024.
- 11.4. It is important that the Council complies with good practice standards, regulatory standards and the relevant legislation.
- 11.5. Failure to comply with these duties could result in formal prosecution being brought against the council as a landlord e.g., potential of a corporate manslaughter case for the most serious of breaches. Failure can also result in a breach of the Regulator’s Home Standard and a regulatory notice if there was actual or potential serious detriment to council tenants.

12. Equality, Diversity & Inclusion (EDI) Considerations

12.1. The Council must, in the making of decisions in exercise of its functions, have due regard to the need to:

- eliminate discrimination, harassment and victimisation;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it, pursuant to s149 (1) Equality Act 2010. This is known as the Public Sector Equality Duty.
- Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
 - remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.
 - encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

12.2 The Public Sector Equality Duty covers the following nine protected characteristics: age, disability, marriage and civil partnership, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

12.3 The Housing Management service is committed to increasing the equality data held so that decisions being made can more effectively consider equality, diversity, and inclusion implications.

13. Climate Change and Environmental Considerations

13.1 No considerations to note.

14. Human Resources/Property Considerations

14.1 No considerations to note.

15. Communication Considerations

15.1 No considerations to note.

Report sign off:

Alice Lester

Corporate Director Neighbourhoods &
Regeneration



Tenant and Leaseholder Engagement Strategy

Housing Management Service 2024 – 2028

Foreword



I'm excited to share our new Tenant & Leaseholder Engagement Strategy. This plan has six promises about how we will listen to the people living in Council homes. Thank you to all the Tenants & Leaseholders who helped make this strategy.

Over the next four years, we will make sure to respect what Tenants & Leaseholders think and feel. In Brent, we support Equality, Diversity, and Inclusion, so this strategy also promises to fight against any unfair treatment of people living in Social Housing.

Listening to Tenants & Leaseholders is very important to help make our homes and communities great places to live.

Councillor Promise Knight
Cabinet Member for Housing, Homelessness & Renters Security

Introduction

Every person who rents or owns a home from the Council is important and should have a say in how their home is managed. This document explains how the Council will listen to what you think about living in your home and make changes based on your feedback.

By talking to you and others, the Council will improve services like fixing your home, keeping shared spaces clean, managing your lease, collecting rent, and making sure you are safe.

This document doesn't talk about every service the Council provides, but any useful feedback will always be shared with the right people.

Events like the fire at Grenfell Tower show that listening to you is the only way we can be a good landlord. Over the next four years, we will work to rebuild our relationship with you, so you feel heard. We will also show you how your feedback has been used to make decisions.

We will be honest and open with information and improve how we communicate with you. This document supports the Council's plan to help everyone in Brent move forward together.

Background Information

The Charter for Social Housing Residents

The government wrote '[The Charter for Social Housing Residents](#)' after the Grenfell Tower fire. It says how Councils and Housing Associations should:

- Make you feel safe in your home.
- Provide you with information about your landlord.
- Reply to complaints quickly and fairly.
- Treat you with respect and dignity.

Tenant Satisfaction Measures

The UK Government now measures how well Councils and Housing Associations are doing by asking for your feedback through surveys about:

- Repairs
- Maintenance
- Safety
- Anti-social behaviour
- Cleaning
- Respect
- Having a say
- Complaints

The government will compare these results to see who is doing well and who is not. Starting in June 2024, these surveys will be done every year.

The Social Housing Regulation Act (2023)

This new law aims to make big changes for people living in social housing by ensuring better regulation and improving the quality of homes and services. It includes:

- Making sure all social housing managers have proper qualifications.
- Allowing the Regulator to monitor landlords more closely.
- 'Awaab's Law' which requires landlords to fix reported health and safety issues quickly.
- Inspecting landlords to see if they are meeting standards.
- Removing limits on fines for landlords who don't meet standards.

The Building Safety Act (2022)

This law was made after the Grenfell Tower tragedy to fix problems in building safety. It includes:

- A new Building Safety Regulator (BSR) to work with residents in high-rise buildings.
- Landlords must create a safety engagement strategy for building safety.

- Landlords must provide safety information and respond to complaints about building safety.

The Housing Ombudsman

The Housing Ombudsman Service helps with complaints about Registered Social Landlords. They provide support, investigate unresolved complaints, and offer insights to improve services. They also give advice on handling complaints well and create reports on common issues like noise and damp.

Addressing Stigma in Social Housing

There is often a stigma around social housing, worsened by negative media. This stigma can sometimes be found within housing organisations themselves. Reports have shown that this stigma can lead to serious issues, such as health and safety risks being ignored. This strategy commits to stopping this.

Our Vision for Housing Management in Brent Council

We want tenants and leaseholders to live in safe and well-maintained homes with high satisfaction.

A New Menu of Involvement

We want to hear from you more often through different activities, whether it's a quick survey or regular meetings. We aim to make it easy for you to give feedback, scrutinize our performance, and be involved in decision-making.

If you want to be involved, you or an advocate can contact us by:

- Email - HousingFeedback@brent.gov.uk
- Telephone – 020 8937 1234 (ask to speak with a Community Development and Engagement Officer)
- Through your housing officer

Accessible by Default

We commit to making our services accessible to everyone. Over the next four years, we will work with you to identify needed adjustments and ensure support is available.

If you need any adjustments so you can get involved in engagement activities, tell us.

Our Commitments

1. Commitment One: We have a culture that respects engagement & make changes using your feedback.

How we will do this:

- We will offer various ways for you to get involved and share feedback.
- Achieve the National Engagement Standard set by the tenant engagement support organisation, TPAS.
- Make sure our contractors (repairs) also offer ways you can get involved.
- We will train all new housing staff on engagement and refresh this training annually.
- We will establish a tenant and leaseholder committee to hold the Council accountable.

2. Commitment 2 – We will learn from your feedback.

How we will do this:

- We will regularly review feedback and complaints to spot areas for improvement.
- Share learning with housing staff and change our practice using this information.
- Host events each year so you can meet with housing staff and report any issues.
- We will use data to identify neighbourhood priorities and engage with specific estates to understand issues.

3. Commitment 3 – We will challenge stigma and make sure you feel included.

How we will do this:

- We will work with you to address any stigma and raise awareness among staff and contractors.
- We will ensure communication is respectful and inclusive.
- Offer training to all housing staff on challenging stigma and stereotypes about people who live in social housing.
- Make community spaces places you feel safe no matter your age, gender, sexuality, religion, ability, race & ethnicity.

4. Commitment 4 – We will make sure you influence decisions about the service we provide.

How we will do this:

- We will involve you in decision-making at both the neighbourhood and strategic levels.

- We will compensate you for your time and ensure you are part of assessing bidders and renewing contracts.
- We will work with you if you live in a high-rise block, so you feel safe and have a say on any work we need to carry out.
- Make sure your housing officer regularly inspects your block or estate and invites you and your neighbours to join them.
- Provide you with regular updates on changes to our service and how your feedback has been used.

5. Commitment 5 - We will be transparent with you and provide information so you can challenge us.

How we will do this:

- We will regularly share information with you using various channels about our performance.
- We will share the results of any consultation or engagement activity we carry out.
- We will meet with Resident Association representatives every two months (minimum) and present how we have delivered this strategy.
- We will support you in scrutinizing services and presenting findings to senior managers.

6. Commitment 6 – We will work with you to make a positive contribution to where you live.

How we will do this:

- We will promote opportunities for you to get involved in community activities.
- We will review community spaces to ensure they are used effectively and safely.
- Help you and your neighbours to apply for funding to run events and activities on your estate or in your community.
- Work with you and our partners like the Police on problems like anti-social behaviour and crime.

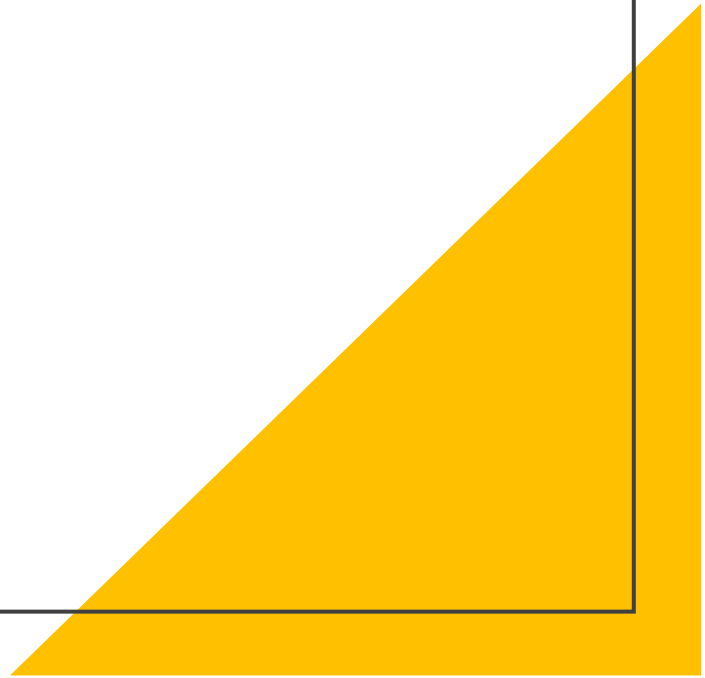
By working together, we aim to create a better living environment for everyone.



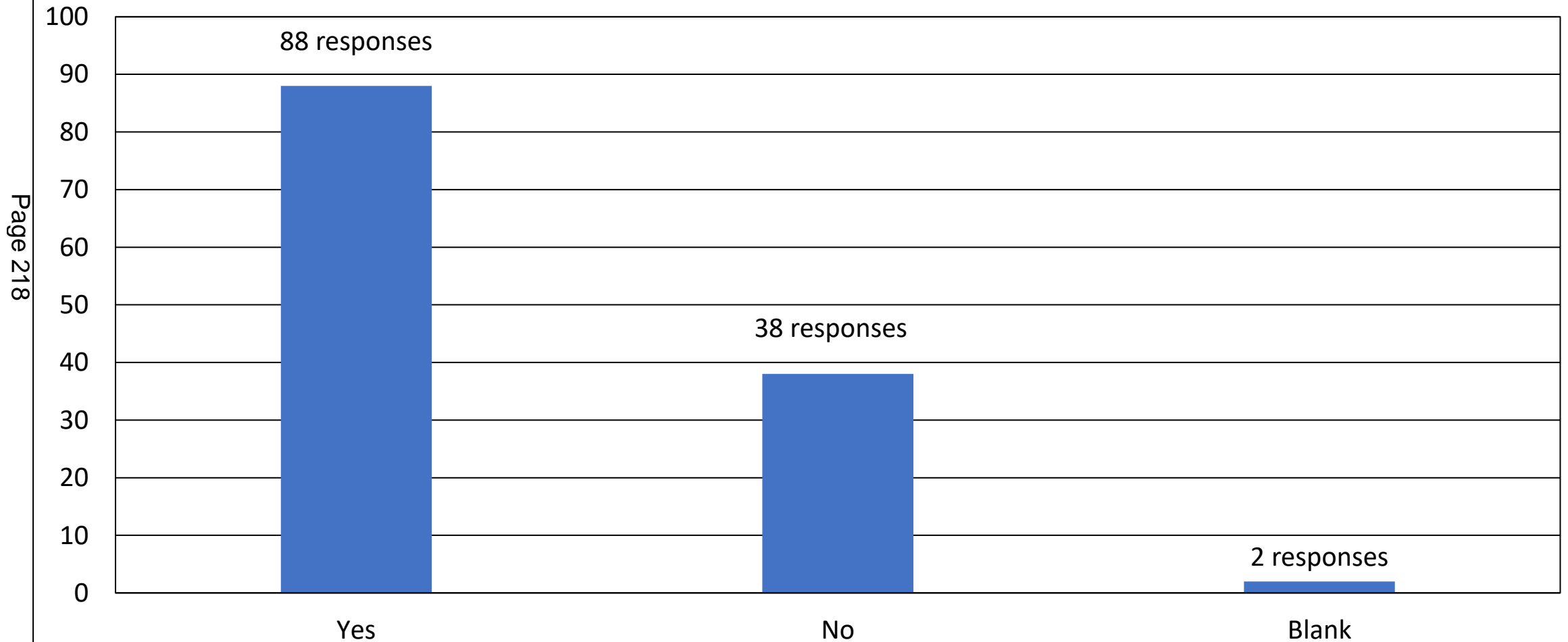
Brent

Tenant and Leaseholder Engagement Strategy

Consultation responses – June 2024



After reading this strategy, is it clear how the council plans to listen to and work with tenants and leaseholders? [If no please explain]



Summary of comments provided from responders who said ‘no’ to the question: *After reading this strategy, is it clear how the council plans to listen to and work with tenants and leaseholders?*

Page 219



More practical information for how this will be implemented (give examples of where you have made change)



Council might listen but companies contracted by the Council do not

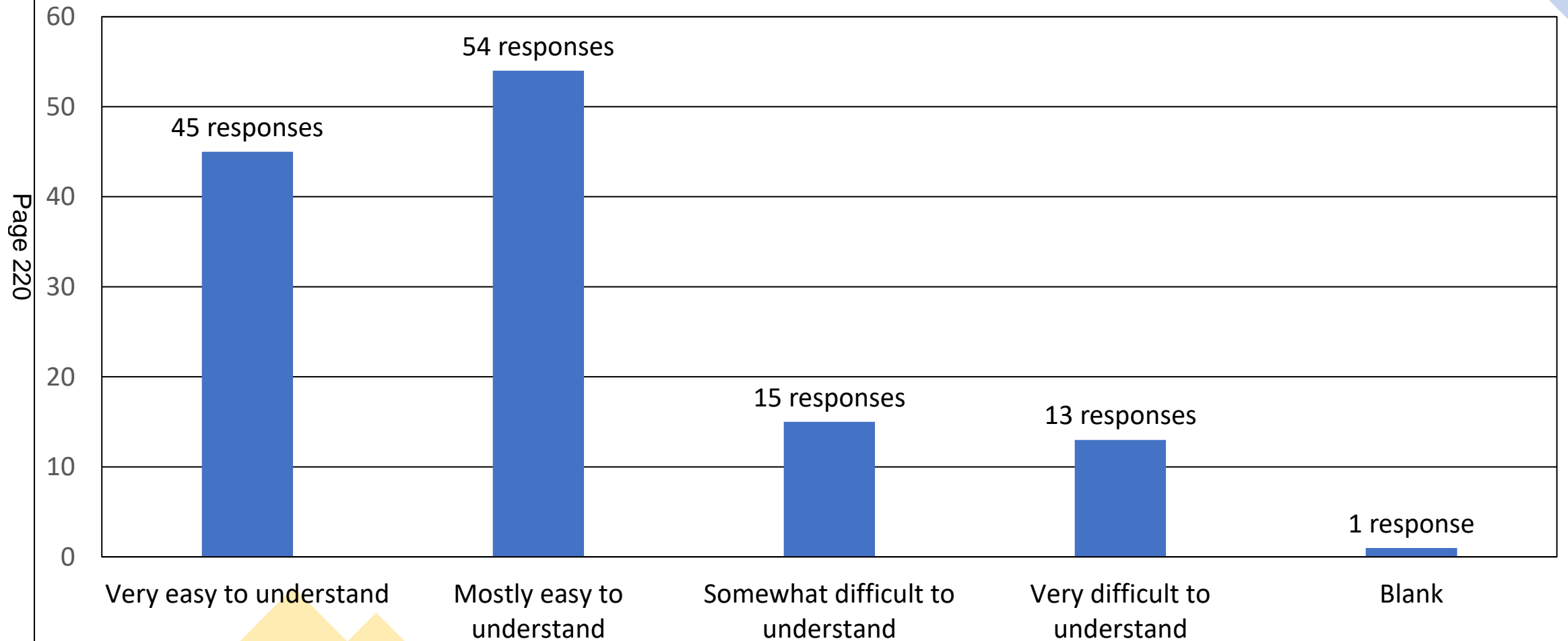


English is my second language



Lack of trust and confidence in the Council to deliver the commitments in the strategy “actions speak louder than words”

Overall, how easy was it to understand the information in the strategy?



Summary of comments provided for the following question ‘Do you have any suggestion on how the language could be improved?’



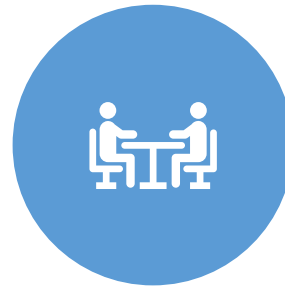
- Use more plain and simple words so everyone can understand it (too stiff, official, corporate) ditch the buzzwords and jargon



- Adapt for residents where English is not their first language and include options for all languages

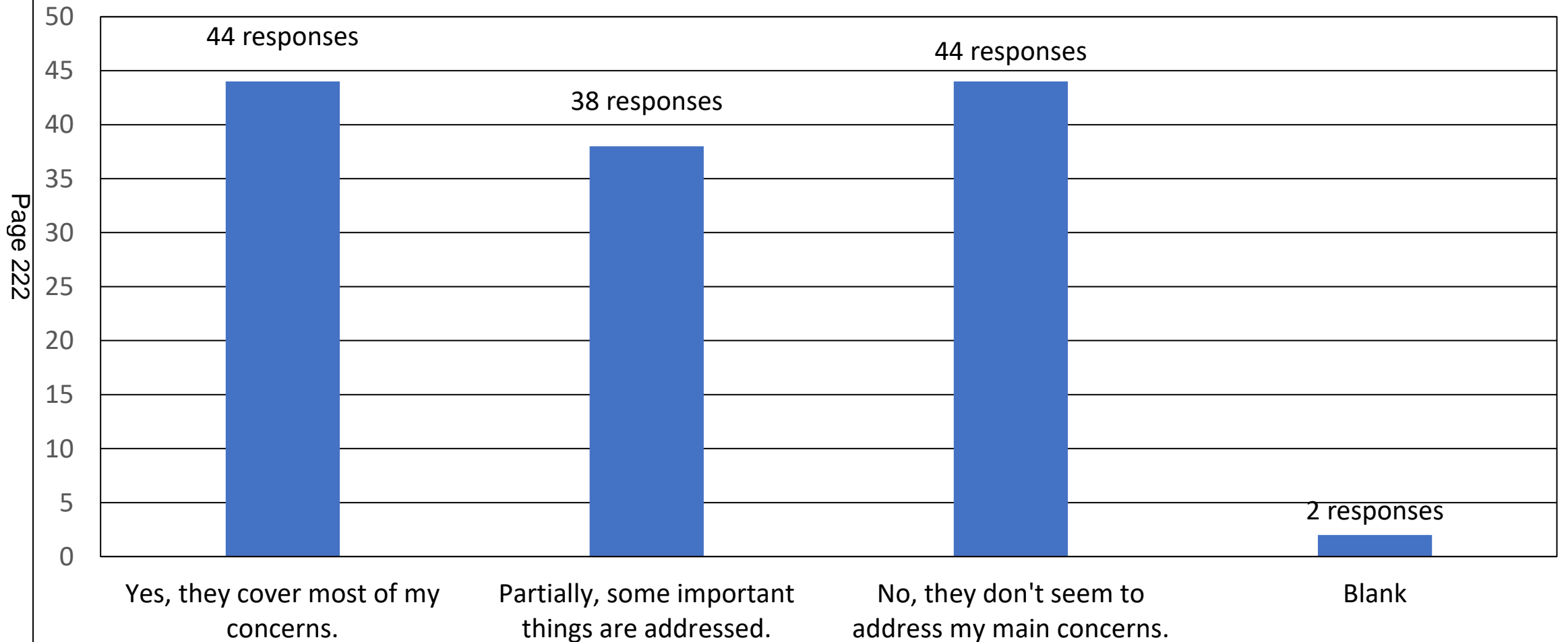


- There is too much to read in the document some of it is boring



- Give examples of what the strategy really means e.g. where feedback has been captured and changes made

Do the commitments address the things that matter most to you as a tenant or leaseholder? If no please explain.



Summary of comments provided from responders who said 'no' to the question: Do the commitments address the things that matter most to you as a tenant or leaseholder?



Being overcrowded and concerns about properties being empty for long periods or underoccupied



Security on existing estate including requests for more CCTV, door entry systems



Service charges and rent are difficult to afford



Repairs are outstanding for a long time and people are waiting for planned maintenance e.g. kitchens to be replaced

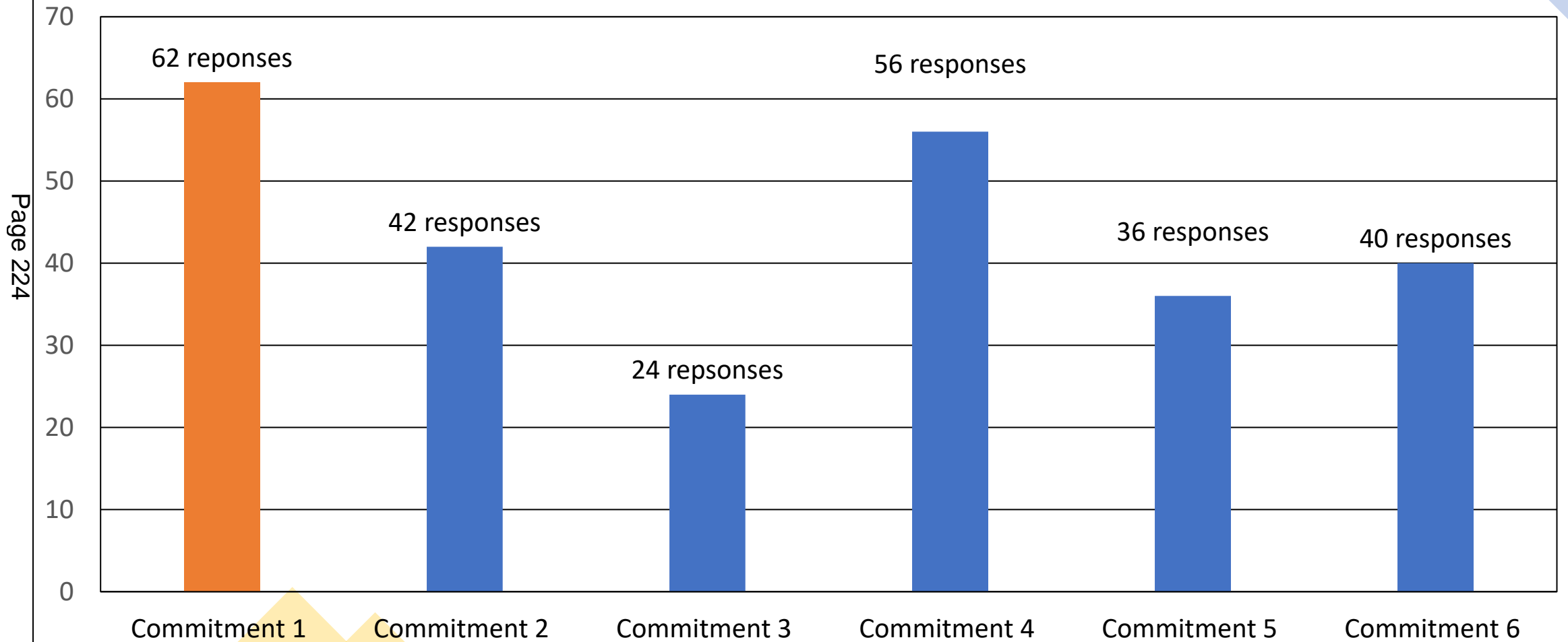


Anti-social behaviour and noise nuisance not dealt with



Keeping estates clean and preventing litter

Which of the Council's commitments do you think is the most important for improving your housing experience?



Commitments in order tenants and leaseholders feel are most important to improving the housing service



The Council has a culture that respects tenant & leaseholder engagement and draws on individual's experiences to make positive change.



Tenants & Leaseholders are supported to make positive contributions to their local community



Tenants and Leaseholders influence decisions in the housing service and feel they have choice.



Tenants & Leaseholders feel informed and empowered to access information, scrutinise services and review the performance of the Council's housing management service.

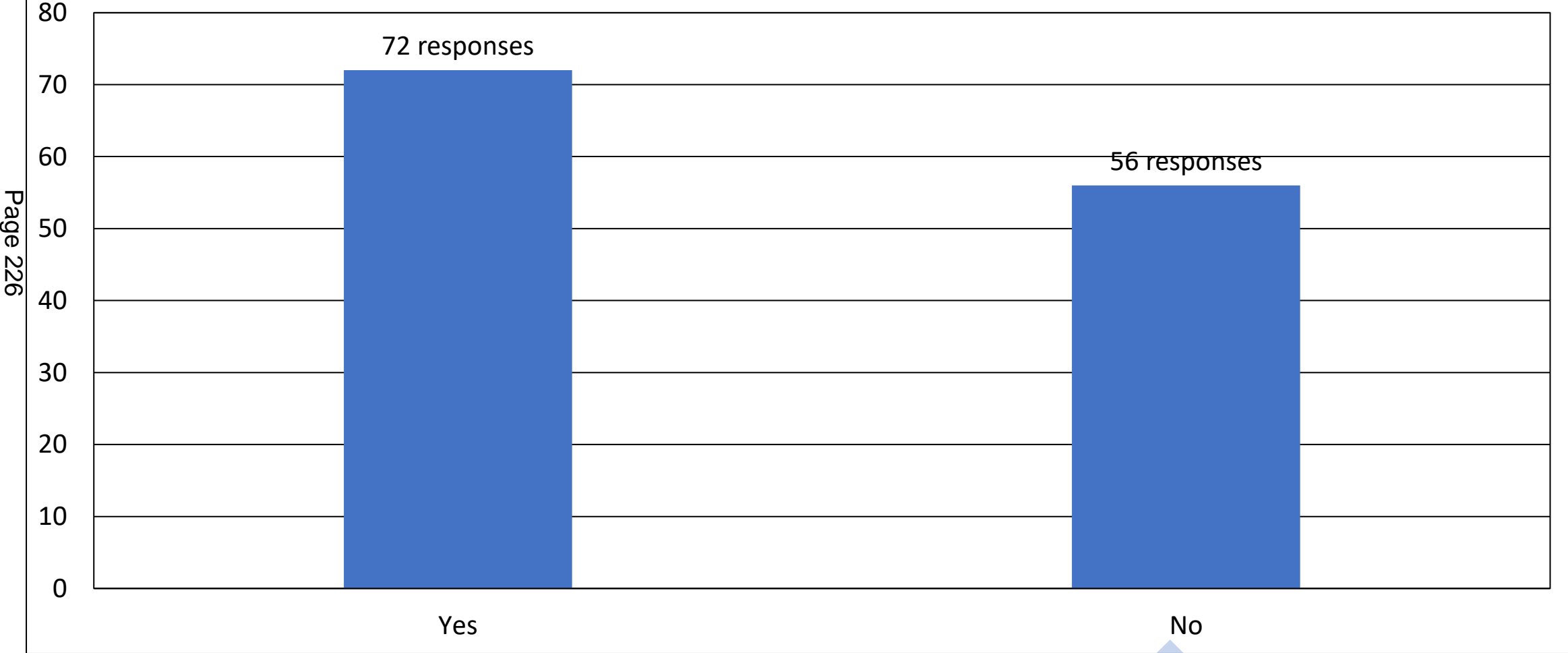


The Council embraces all forms of feedback as a tool for learning and making change



The Council is proactive in challenging potential stigma experienced by tenants living in social housing and promotes the Council's wider commitment to equality and diversity.

Are there any important issues or concerns that you feel the strategy doesn't cover?



Issues or concerns that the strategy doesn't cover



Crime, noise and anti-social behaviour – general safety for people who live on estates and in blocks



Monitoring what staff are doing and making sure they're done in a professional way e.g. monthly checks. Reassurance staff and contractors will turn up when they say they will and not having to wait to report issues for something to happen



Rent costs, service charges, management fees (leasehold) and affordability & being clear where rent is being spent



Making sure the needs of disabled tenants and leaseholders are also considered in engagement including those with neurodiversity

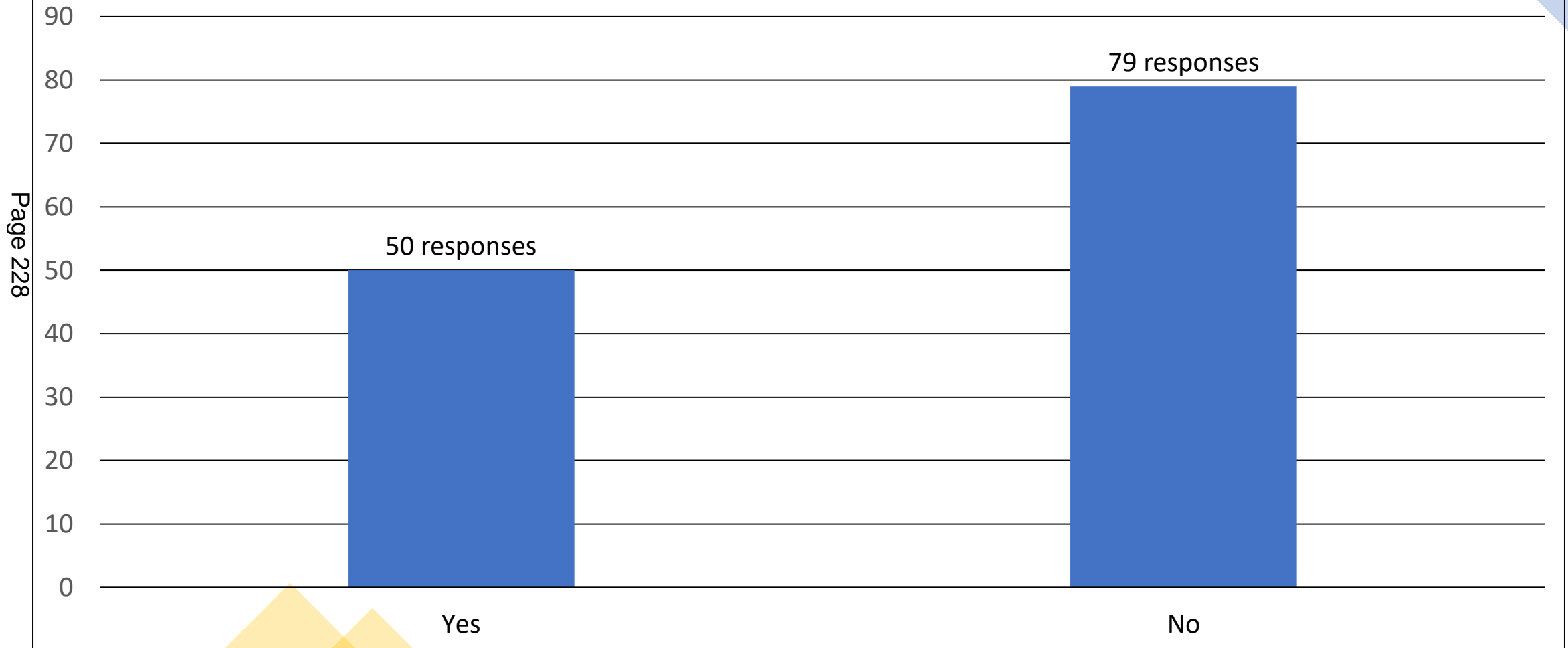


Investing in homes and communal areas e.g. replacing kitchens and bathrooms, maintaining gardens and repainting areas



Help for older people with things they can't manage e.g. garden

Are there any barriers that might make it difficult for you to participate in some engagement activities?



Summary of comments provided for the following question 'Do you have any suggestion on how the language could be improved?'



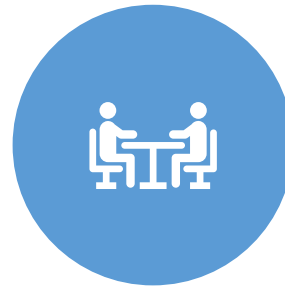
Childcare



Often working so can't attend things during the day



Disability/ Health



Not feeling like its worth it (feedback or issues reported have previously been ignored) / no trust it will make a difference

How will we use your feedback to this consultation?

Our response:

- Update the strategy to make it plain English and remove all jargon – **Complete**
- Publish or share outcomes from all consultations and engagement activities run by the service and include what impact has been made (**introduce from June 2024**)
- Publish information on how tenants and leaseholders can get involved (**target July 2024**)
- Include upcoming consultation and engagement activity on the website that has been planned for this year (including updating the Council's anti-social behaviour policy and current repairs re-procurement consultation (**target August 2024**))
- Produce a specific policy on reasonable adjustments so tenants and leaseholders feel able to have a say regardless of their circumstances (**target October 2024**)



Keeping Our Homes Safe: A Plan from Brent Council

What's Our Plan?

We want to make sure everyone living in our tall buildings is safe. We have a new safety plan to help with this. The plan follows new rules introduced by Government under the Building Safety Act 2022.

Why Do We Need This Plan?

There's a new rule that says we must keep tall buildings very safe. Tall buildings are buildings that are 18 metres OR seven floors high and taller. We need to talk to the people living there to find out how to keep them safe and keep them updated with our plans for the building.

What Will We Do?

1. **Sharing Information:** We will tell everyone about important safety information.
2. **Listening to You:** We will ask for your thoughts and make sure we listen.
3. **Checking on Safety:** We will see if what we're doing is working well.

Who's in Charge?

Brent Council is in charge of making sure that the tall buildings it owns is safe for the people who live in them. We have specific people in charge of doing this:

- Senior Managers
- Safety Officers
- Housing Officers
- People who talk to residents

If you have any worries about safety in your home, you can email us at BHMBuildingSafety@brent.gov.uk

Knowing Who Lives in Our Buildings

We need to know everyone living in our tall buildings, especially if someone needs help during an emergency. We will ask everyone once a year who lives in their home and if anyone needs special help. This helps the firefighters know who to help first. Some examples include:

- If you have trouble walking or climbing stairs by yourself
- If you have poor eyesight or hearing

How We Will Share Information With You

We will use different ways to give you information:

- Letters to your home
- Posters in your building
- Information on our website

Every year, we will have a meeting about your building to talk about safety. You can ask questions and learn about any changes we are making at this meeting. We will publish dates of meetings on our website and contact you beforehand so you know when and where the meeting will be.


Asking for Your Opinions

We will ask what you think about:

- Big changes to your building and how that can affect you.
- Safety checks and repairs.
- Telling us about any new problems you have noticed.
- New safety rules.

Checking Our Plan

We will look at our plan every year to make sure it's working. We will ask for your help to make it better.

	<p align="center">Cabinet 17 June 2024</p>
	<p align="center">Report from the Corporate Director of Partnerships, Housing and Resident Services</p>
	<p align="center">Lead Member- Cabinet Member for Housing (Councillor Promise Knight)</p>
<p align="center">Private Sector Housing Strategy (2024-2029)</p>	
Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
List of Appendices:	<p>Four</p> <p>Appendix 1: Private Sector Housing Strategy Draft</p> <p>Appendix 2: Consultation Feedback Summary</p> <p>Appendix 3: Draft Action Plan</p> <p>Appendix 4: Equality Impact Assessment Report (Please note this appendix has been marked as "To Follow")</p>
Background Papers:	
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	<p>Triza Handa, Head of Private Housing Services 020 8937 4037 Triza.Handa@brent.gov.uk</p>

1.0 Executive Summary

1.1 This report provides a progress update on the development of the new Private Sector Housing Strategy (Appendix 1). It includes a summary of the responses received to the recent public consultation carried out and recommends the Strategy for final approval and publication.

2.0 Recommendation(s)

2.1 That Cabinet note the consultation response and subsequent changes to the drafted strategy.

2.2 That Cabinet provide any comments or feedback on the updated strategy draft.

2.3 That Cabinet give approval for the strategy to receive sign-off for final publication.

3.0 Detail and Background

3.1 Cabinet Member Foreword

3.1.1 This draft strategy supports the Council's wider borough plan to Move Brent Forward Together and sets out how we will work to deliver our vision for the private housing sector in Brent, which is for it to be a safe, stable and accessible housing option for our residents.

3.1.2 In particular, this strategy supports the borough plan priority to provide prosperity and stability in Brent through helping to deliver the desired outcome for safe, secure and decent housing across the borough.

4.1 The first draft of the Private Sector Housing Strategy was produced in September 2023, before approval was given to launch a public consultation in November 2023.

4.2 The public consultation took place over a 10-week period, from 5 January 2024 to 18 March 2024 and a summary of the feedback from the consultation can be found in appendix 2. Activities carried out as part of this consultation to ensure all key stakeholders were offered an opportunity to provide feedback were:

- Social media promotion of the proposed strategy and routes to provide feedback;
- An online 'have your say' page where the draft strategy was shared alongside a feedback survey;
- Face-to-face engagement with private sector residents at the Private Sector Tenants Fair, attended by 500 Brent residents;
- Focus groups with key external partners, including: Advice for Renters, Crisis, London Renters Union and Justice 4 Tenants;
- Internal promotion of the consultation through Viva Engage and the weekly Chief Executives Message; and
- Promotion of the consultation in the Members Bulletin and direct consultation with the Portfolio Holder for Housing.

4.3 A detailed plan will be developed which will set out how each commitment and actions coming from them will be delivered during the lifetime of the strategy, with the draft plan detailed in Appendix 3.

5.0 Consultation response and amendments made to the strategy

Commitment One

5.1 For commitment one of the Strategy ("*we will work to increase the supply of private sector homes available in Brent so it is an accessible housing option for residents*"), 76% agreed that it should be a priority for the Council. For actions proposed under this commitment, particular favour was given to the continued

dedication to bring empty homes back in to use, ensuring they do not fall into disrepair.

- 5.2 Some feedback suggested that the proposed research into shared ownership homes should be re-considered, with stakeholders highlighting that it is not always an option for lower-income households and often does not mean more homes for Brent residents, instead encouraging out of borough residents to purchase homes in Brent. No definite decision has been made on whether Brent will consider shared-ownership as a housing option moving forward, the strategy only commits to commissioning a study into the demand for it in Brent and best practice within the sector, so this has been left in as an action.

Commitment Two

- 5.3 For commitment two of the Strategy (*“we effectively tackle poor property conditions across the private sector in Brent”*), 90% agreed that it should be a priority for the Council. In particular, support for the extended licensing scheme was very evident in the feedback for this commitment.
- 5.4 Feedback for this commitment suggested that there should be more focus on positive engagement with local landlords. This is something the service already does, however a commitment to increase awareness of, and continue to prioritise, this work has now been added to the strategy.
- 5.5 Some feedback for this commitment highlighted concerns that the fee for the licensing scheme may be passed on to tenants, and particular concerns around some poor practice across letting agents within the borough. Whilst there is not anything the Council can do to directly prevent this, a commitment has been added to strengthen Private Housing Services relationship with Trading Standards teams to ensure good signposting is in place for them to effectively take enforcement action against rogue landlords, letting agents and property management businesses where the Private Sector Housing Service is unable to.
- 5.6 Some minor wording changes have also been made to this commitment following feedback to better reflect our approach to taking enforcement action e.g. we take enforcement action against those who breach standards even just once, whereas previous language stated ‘repeated breaches’.

Commitment Three

- 5.7 For commitment three of the strategy (*“we prioritise supporting residents to access and stay in their private-sector home, living safe and comfortable lives”*), 83% agreed that it should be a priority for the Council.
- 5.8 Feedback for this commitment suggested that the proposed development of the tenants toolkit should be done in partnership with an external agency to broaden the reach and encourage trust from private sector tenants. Private Housing Services has already begun engaging with Advice 4 Renters to lead on the development of this toolkit, and further engagement with key stakeholders will be carried out before its final publication.

5.9 Further feedback on this commitment queried what the Council was doing to keep residents informed on the Renters Reform Bill and what it means for them. An additional commitment has been added to the strategy to include updates, advice and guidance on new legislation and its implications in future communications plans for the service.

6.0 Stakeholder and ward member consultation and engagement

6.1 These details have been set out above.

7.0 Financial Considerations

7.1 Neither this report or the draft PSH strategy or the commitments coming from it have any additional financial implications over and above that already identified for the delivery of existing services.

8.0 Legal Considerations

8.1 A local housing authority has powers and duties in relation to private sector housing under Housing Act 2004 Parts 1 to 4, the Housing Act 1985 Part 8, the Local Government and Housing Act 1989 Part 7 and the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 Article 3.

8.2 Local authorities also have a range of enforcement tools and incentives at their disposal to bring empty homes back into use. These include, but are not limited to, Empty Dwelling Management Orders, Council Tax exemptions and premiums, enforced sales, compulsory purchase, and measures to secure the improvement of empty properties. There are also other initiatives and incentives that can help reduce the number of empty properties, including the sale of empty Government-owned properties, planning measures and Value Added Tax (VAT).

8.3 Section 3(1) of the Local Government Act 1999 requires local authorities to “*make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.*” This is known as the Best Value Duty. Before deciding how to fulfil this duty, authorities are under a duty to consult representatives of a wide range of local persons; this is not optional. They must consult representatives of council tax payers, those who use or are likely to use services provided by the authority, and those appearing to the authority to have an interest in any area within which the authority carries out functions.

There are four principles on consultation which were established in the 1985 case of *R (ex parte Gunning) v Brent LBC* and they are set out below. In order for consultation process to be fair, a public body must ensure:

- that the consultation must be at a time when proposals are still at a formative stage;
- that the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response;
- that adequate time is given for consideration and response; and

- that the product of consultation is conscientiously taken into account when finalising the decision.

9.0 Equity, Diversity & Inclusion (EDI) Considerations

9.1 An equality impact assessment (“EIA”) has been carried prior and will be circulated to Cabinet prior to the meeting as Appendix 4. The EIA (marked as “To Follow”) takes into account the observations made by stakeholders during the consultation process. The results of the EIA will need to be considered by the Cabinet when it makes a final decision regarding the strategy and any proposed changes or modification to ensure it complies with the Public Sector Equality Duty as set out in section 149 of the Equality Act 2010.

10.0 Climate Change and Environmental Considerations

10.1 This paper has no direct impact on the Councils environmental objectives or climate emergency strategy.

11.0 Human Resources/Property Considerations (if appropriate)

11.1 None.

12.0 Communication Considerations

12.1 The Housing Services Directorate will develop a communications plan to both promote this strategy and commitments within the strategy on an ongoing basis as and when needed.

Report sign off:

Peter Gadsdon

Corporate Director of Partnerships, Housing and Resident Services

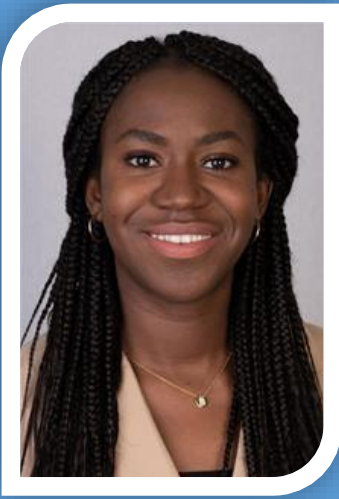
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LONDON BOROUGH OF BRENT

Private Sector Housing Strategy

[2024–2029]



Foreword

It is with great pleasure that I introduce the London Borough of Brent's new Private Sector Housing Strategy for the next 5 years.

It is well understood that good quality housing is vital to individual health and wellbeing, as well as being an essential part of ensuring safe and thriving communities.

Through the delivery of this strategy we will support private-sector tenants to know their rights, access help when needed and live safely and securely in their homes.

We will also be tough on rogue landlords, tackling poor property conditions through strong enforcement action and a strengthened landlord licensing scheme, ensuring a good quality of life for those living in the private sector across the borough.

This strategy supports our aim for the private sector to be a safe, stable and accessible housing option for all who call Brent their home.

Councillor Promise Knight

Cabinet Member for Housing, Homelessness and Renters Security

Introduction

In the London Borough of Brent, we believe that everyone deserves a safe, comfortable and stable place to call home.

In London, almost half of all households own their home and 30% rent privately. For Brent, these levels are even higher, with an estimated 46% renting privately and 40% owning their home.

Through this strategy, we want to achieve good quality, safe and secure housing for Brent residents. We recognise a person's experience of their home and how they feel about it can substantially impact their health, quality of life and life chances. Improving housing conditions, particularly in the private sector, can help to reduce poverty, mitigate climate change and generally contribute towards a healthier and happier society. This means that now, more than ever, addressing instances of poor condition and instability in the private sector is vital.

Though this strategy has a focus on improving property conditions, it is the people living in these homes that are at the centre of our commitments. Whether this be through supporting people to better understand their rights, the help that is available or tackling landlord negligence.

This strategy supports the councils' wider borough plan to [Move Brent Forward Together](#) and sets out how we will work to deliver our vision for the private housing sector in Brent:

The private housing sector in Brent is a safe, stable and accessible housing option for our residents.

National and local context

Size of the private housing sector

The private housing sector as whole has been steadily growing since the early 2000's and today accounts for approximately 83% of all households across England. This is made up of 4.8 million households living in private-rented homes and 14.6 million owner-occupiers.

In Brent, like other London Boroughs, the private sector has taken two different paths; with the significant growth in private-rented properties and significant drop in owner-occupied. The table below shows how the proportion of households have changed in Brent across the different tenures over the last three census surveys:

	Owner-occupied	Private rented	Social rented	Other
2001	56%	18%	24%	2%
2011	44%	30%	24%	2%
2021	40%	36%	24%	-

Whilst the 2021 census estimated the Private Rented Sector to be in the region of 36%, independent research undertaken by Brent in 2022 shows that the real size of the Private Rented Sector is considerably larger and actually equates to 46% of all housing stock or approximately 58,000 properties.

Affordability and tenancy sustainment

Whilst an increasing number of people across the country have accessed the private sector to find a home, those households are often impacted most harshly with wider affordability pressures. This is particularly the case for private renters, who spend an average of 31%

of their household income on rent in comparison to 27% for those in social rented properties and 18% for homeowners with a mortgage.

Private sector tenants are also found to move home more frequently, often not by choice, but down to the ending of a tenancy through a 'no fault' section 21 eviction. This means that these households are impacted more often with the costs associated with frequent moves, both financially and socially, as a result of the disruption to home life and the inability to put down roots in a community.

Similarly to elsewhere across the country, private rented properties are one of the least affordable tenures in Brent. A review carried out by Cambridge University on behalf of Brent Housing Service found that, when looking at single people, lone-parents and family households, more than half of each group would struggle to afford the majority of rental properties available on the open market across the borough.

These challenges of affordability and instability in the private housing sector can sometimes cause significantly negative outcomes for someone's housing circumstances. The Brent Homelessness Review, which took place in 2019 to inform an updated Homelessness and Rough Sleeping Strategy, highlighted that the ending of a private rented tenancy was the most common reason for someone approaching the council for help with housing. This is still the case today, with over a quarter of accepted homelessness duties in 2022 being as a result of a private tenancy ending. In contrast, less than 1% of accepted homelessness duties were a result of inability to continue to afford a mortgage.

The private housing sector role in addressing homelessness

The private sector, specifically supply of good quality, affordable homes in the private sector, is pivotal in supporting the Council to help prevent and relieve homelessness. A recent report commissioned by London Councils found that the number of available rental listings has

been falling nationally, down by 33% since 2017 and this is compounded in London, with a fall of 41%. This reduction in supply is leading to increasing rental prices, with February 2023 asking rents being close to 20% higher than they were three years prior.

Due to a shortfall of social housing in London, securing PRS accommodation is often the only viable option when it comes to securing a home for those experiencing homelessness and Brent homelessness service heavily relies on the private sector to meet its statutory duties to prevent and relieve homelessness.

Empty homes

Central government statistics state that as of October 2022, there are 676,452 empty homes across England, with approximately 13% of these being located in London. Not only do empty properties mean less homes available for those who need them, they also negatively impact the surrounding neighbourhoods and the lives of people who live in them by causing blight, attracting vandalism and other forms of anti-social behaviour.

As of the end of March 2023, there are a total of 2325 empty private sector homes in Brent. This number includes properties that are empty for a variety of reasons, such as probate, second homes, transactional vacancies of new housing stock, or properties in the process of being sold. Vacant properties are a normal part of a functioning housing market. However, if they are left empty and unattended for long periods, they can fall into decline. Long term empty properties are classified as those that have been empty for 6 months or more. Of the 2325 empty properties in the borough, 745 are considered long term empty properties, this figure does not include Council tax exemptions.

Property conditions

A key indicator of housing quality is whether a home meets the Decent Homes Standard as set by central government. A decent home is one that:

- Meets the statutory minimum standard for housing
- Is in a reasonable state of repair
- Has reasonably modern facilities
- Provides a reasonable degree of thermal comfort

The English Housing Survey 2021-22 highlighted that around 3.5 million homes across England are non-decent. The survey estimates that around 23% of privately-rented, 14% of owner-occupied and 11% of social rented homes are in non-decent condition. It is evident that privately-rented properties in particular are at risk of poor conditions, as this tenure also has the highest prevalence of category one hazards (risk of serious harm or death) when compared to owner-occupied and social rented homes.

A whole market review of Brents PRS sector carried out in 2022 found that around 18% (more than 10,000) of PRS properties across the borough have at least one Category 1 Hazard (excl. known HMOs). A Category 1 Hazard suggests an immediate risk to the health and safety of the resident. This distribution of Category 1 Hazards in Brent is higher than the national average, which is 12%.

Energy efficiency is a key indicator of whether a property provides a reasonable degree of thermal comfort. Under the current Minimum Energy Efficiency Standard (MEES), properties must have an Energy Performance Certificate (EPC) rating of E and above before they can be let out. Currently in Brent, 1.3% of the PRS have an F and G rating,

which means approximately 755 PRS properties are likely to fail the MEES statutory requirement.

National policy interventions

Whilst a number of national policy interventions have aimed to address some of the above discussed challenges over the last five years, there is continued acknowledgement that more work is needed in order to truly overcome them. The recent focus on private sector housing in central government white papers suggests a desire for more regulation, which has been generally welcomed by the sector.

Examples of some recent policy interventions:

- **Homes (Fitness for Human Habitation) Act 2018** which provides tenants with an alternative route to address health and safety concerns in their rented property
- **Tenant Fees Act 2019** which banned most letting fees and capped tenancy deposits
- **Electrical Safety Standards in the PRS Regulations 2020** which ensures all privately-rented properties receive electrical safety checks at least every five years

In February 2022, central government published their white paper, '[Levelling up the United Kingdom](#)'. This set out the intention to create a housing system that works for everyone through increasing access to home ownership, reforming the planning system and putting a focus on improving housing quality, especially within the private rented sector, setting a target for the number of non-decent rented homes to have fallen by 50% by the year 2030.

More recently, in June 2022, the Department for Levelling Up, Housing and Communities published their follow-up white paper – '[A Fairer Private Rented Sector](#)' – which detailed a plan to address challenges

across the private rented sector, including a proposal for a new Renters Reform Bill. Some of the key proposals included in this white paper were:

- The abolishment of 'no fault' Section 21 evictions
- Extending the Decent Homes Standard to private landlords
- The launch of an ombudsman service for private renters
- Ending the use of rent review clauses and restricting rent increases to once per year
- Increasing of enforcement powers and fine regimes for local authorities

The Renters Reform Bill was published on 17 May 2023 and has started its journey through parliament.

Engagement with private rented sector residents in Brent

In September 2020, a [Poverty Commission Report](#) for Brent included a recommendation for a whole market review of the PRS across the borough, with a specific focus on the resident perspective. In 2022, a research exercise was carried out with Brent PRS residents which included 371 responses to a survey and 18 in-depth interviews. Some key findings from this research included:

- Affordability is a key concern for PRS residents with 25% stating that, after rent expenditure, they do not have money for food and other essentials
- More than half of those surveyed didn't feel that they have enough space in their home with 45% stating that they feel over-crowded with no access to outside space

- Only four residents out of those surveyed stated that they would contact the council for support in relation to their home, and those who had contacted the council previously reported a negative experience
- A number of PRS residents report health issues exacerbated by overcrowding and poor property conditions

A set of recommendations were provided based on the findings from this research and, where appropriate and not already complete or underway, have been included in the commitments of this strategy.

The private sector housing offer in Brent

Property licensing and tackling poor standards

Brent residents deserve to live in safe, secure and comfortable accommodation. The Private Sector Housing Service in Brent uses powers and duties under The Housing Act 2004 to tackle poor property standards through the [Housing Health and Safety Rating System \(HHSRS\)](#).

Brent has also introduced a selective licensing scheme, which means landlords must apply for a licence if they want to rent out their property in an area covered by the scheme. This allows the council to check that the property is being managed and maintained in a way that ensures the health and safety of the tenant and take any necessary enforcement action where this isn't happening.

This strategy should be read in conjunction with the Private Housing Service's Enforcement Policy, which sets out in more detail, the

council's approach to enforcement and the range of statutory and discretionary powers we use to address poor property conditions and tackle rogue landlords.

Disabled adaptations and other housing assistance

With the intention of supporting people to live independent and healthy lives in their own homes for longer, with fewer people staying in hospital or residential care unnecessarily, Brent Council uses the Housing Grants, Construction and Regeneration Act 1996 (the 1996 Act) to offer:

- **Discretionary Disability Adaptations Grants (DDAG)** which can be used to provide and maintain disabled facilities in the home i.e. mobility lifts, dementia appropriate assistance and a fast-track pathway for urgent clinical need where required.
- **Small Works Grants (SWG)** which can be used to support homeowners requiring essential repairs, up to a total value of £7,000 in any rolling three-year period. This service can also be used to provide repairs or modifications required to maintain disabled facilities or to quickly provide minor disability-related adaptations.
- **Hospital Discharge Assistance Service (HDAS)** which is a free dedicated in-house service to support facilitation of difficult hospital discharges, up to a value of £7,000 for each applicant. Can also refer onto DDAG and other support, such as Tele-care, social workers and equipment services.

Bringing empty properties back into use

Brent's dedicated Empty Property Team are committed to reducing long term empty properties within the borough in order to maximise the existing housing stock, increase the supply of housing and reduce the negative environmental and social impact associated with empty properties. This is achieved by encouragement, working directly with the owners of empty properties, or enforcement where necessary.

The Council has a generous grant scheme for owners and managers of empty properties that can be used to contribute towards the cost of renovation as needed. Properties receiving an Empty Property Grant must be used to house families in housing need for a 5 year period. Grants can be given to refurbish a property or for the conversion of one dwelling into several separate units, this is applicable to residential and commercial properties.

If required, enforcement action can be taken to bring an empty property back in to use. Enforcement action can include:

- **Compulsory Purchase Orders (CPO)** which allows us the power to acquire a property and transfer the ownership.
- **Enforced Sales** where we will seek to reclaim monies for work that is carried out on a property by placing a charge on the property and taking the owner to court to force the sale of the property for the repayment of the debt.
- **Empty Dwelling Management Orders (EDMO)** which allow the Council to secure a management order to take over the management of a property for a period of 7 years.

The commitments

Taking into consideration the context of the private rented sector at both a national and local level as detailed above, the council is making the following commitments which aim to deliver our vision of the private sector in Brent being a safe, stable and accessible housing option for residents.

Commitment One

We work to increase the supply of private sector homes available in Brent so it is an accessible housing option for our residents

There are several ways that we increase the number of private homes within the borough, including increasing affordable home ownership e.g. through shared ownership schemes, as well as working to bring empty properties back in to use. The private sector also contributes towards the delivery of affordable homes for residents through developer contributions under S106 provisions. We will continue to drive forward these initiatives in Brent over the lifespan of this strategy to increase the availability of homes in the private sector and in turn, support our homelessness service to deliver their statutory duty to find good quality, affordable homes for those experiencing homelessness.

To achieve this, we will:

- Commission a study into the demand for Shared Ownership and best practice within the sector to establish a 'Brent Shared Ownership' standard for all new builds in the borough
- Promote the work of our Housing Initiatives Team who work with property owners and developers to discuss available options for their empty properties and offer Empty Property Grants which helps to provide homes for homeless families
- Pursue owners of empty properties and take enforcement action where necessary to ensure that they do not allow their properties to fall into disrepair

Commitment Two

We effectively tackle poor property conditions across the private sector in Brent

Living in poor property conditions has a detrimental effect on the health and wellbeing of our residents. In Brent, we have a dedicated Private Sector Housing Service who prioritise tackling poor conditions and taking action against landlords and other private sector property managers who do not meet the required standards. We want to build on this over the lifetime of this strategy by strengthening inspection regimes and enforcement approaches.

To achieve this, we will:

- Tackle health and safety concerns in private sector properties by taking formal action to resolve category one and serious category two HHSRS hazards
- Build upon our current landlord licensing scheme by extending it to cover more areas of the borough, inspecting 50% of all selective licenced properties and all licenced HMO's
- Strengthen our enforcement against property owners and managers who breach required standards through prosecution and fines, as well as publishing enforcement results to name and shame failing landlords
- Build on our partnerships with other services and agencies across the borough to enable a wider reach in effective enforcement against landlords and property managers who breach required standards.
- Strengthen signposting processes between the service and Trading Standards who can help to raise awareness of, and take enforcement action against rogue landlords, letting agents and property management businesses.
- Increase awareness of, and prioritise, the engagement work the service does with local landlords, including offering training and promoting accreditation opportunities.

Commitment Three

We prioritise supporting residents to access and stay in their private-sector home, living safe and comfortable lives

Through surveys and interviews with tenants living in private rented properties across Brent it was identified that tenants aren't always aware of where to find information that can support them in managing their tenancies. Conversations with Brent staff and other external agencies demonstrated that whilst there are many activities and services available to support PRS residents, they aren't marketed at them directly which can make them difficult to find and access. We want to use this strategy to make information and support more accessible for PRS residents in Brent.

To achieve this, we will:

- Develop and promote an accessible Tenant Toolkit which will inform PRS tenants of their rights, services available to them and what to do in case of issues such as waste management and recycling
- Ensure the Tenant Toolkit is shared with Brent Customer Services, Brent Hubs Staff and Partners so it is at the forefront of advice given to private sector tenants and can be effectively used for signposting

- Widely promote our Disability Adaptations Grants, Small Works Grants and Hospital Discharge Assistance Service in order to support making homes more accessible for disabled and vulnerable residents and address essential repairs and maintenance action where needed.
- Include ongoing advice and guidance about developing legislation and what this means for private sector tenants and local landlords in ongoing communication plans to ensure we're keeping residents informed
- Work with households at risk of homelessness or experiencing homelessness to sustain effective tenancies and access affordable housing options in the private rented sector.

residents will also enable more people to remain living independently in their home for longer.

The delivery of this strategy will be monitored by an ongoing action plan and performance indicators.

Moving forward

This strategy commits to delivering a safe, stable and accessible private housing sector in Brent, prioritising a resident-centred approach to providing services.

By focusing on increasing the range and supply of homes available in the private sector across Brent, more people who need a home will be able to access one that meets their needs. Tackling poor property conditions and challenging under-performing landlords in the borough will ensure the safety of residents, and improve their health and wellbeing in relation to their home. Providing advice, guidance and support to private sector residents will empower them to know their rights, obligations and so manage their tenancies confidently. Greater focus on the support available for disabled and vulnerable

Appendix 2 - Private Sector Housing Strategy – Consultation Feedback Summary

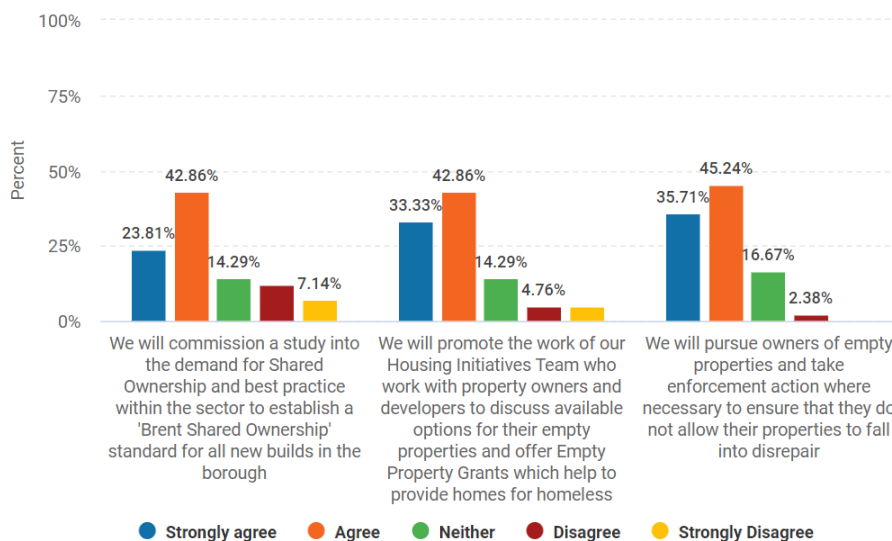
1.0 Format of the consultation

- 1.1 A draft of the Private Sector Housing Strategy was taken to PCG in November 2023 where approval to go out for formal consultation was given.
- 1.2 The consultation period took place over 10 weeks, between 5 January and 18 March 2024.
- 1.3 Activities carried out as part of this consultation were:
 - Social media promotion of the proposed strategy and routes to provide feedback;
 - An online 'have your say' page where the draft strategy was shared alongside a feedback survey;
 - Engagement at a Private Sector Tenants Fair attended by 500 Brent residents;
 - Focus groups with key external partners including: Advice for Renters, Crisis, London Renters Union and Justice 4 Tenants.
 - A drop-in session for Brent staff;
 - Internal promotion of the consultation through Viva Engage and the weekly Chief Executives Message; and
 - Promotion of the consultation in the Members Bulletin and direct consultation with the Portfolio Holder for Housing.

2.0 Feedback received

Commitment 1

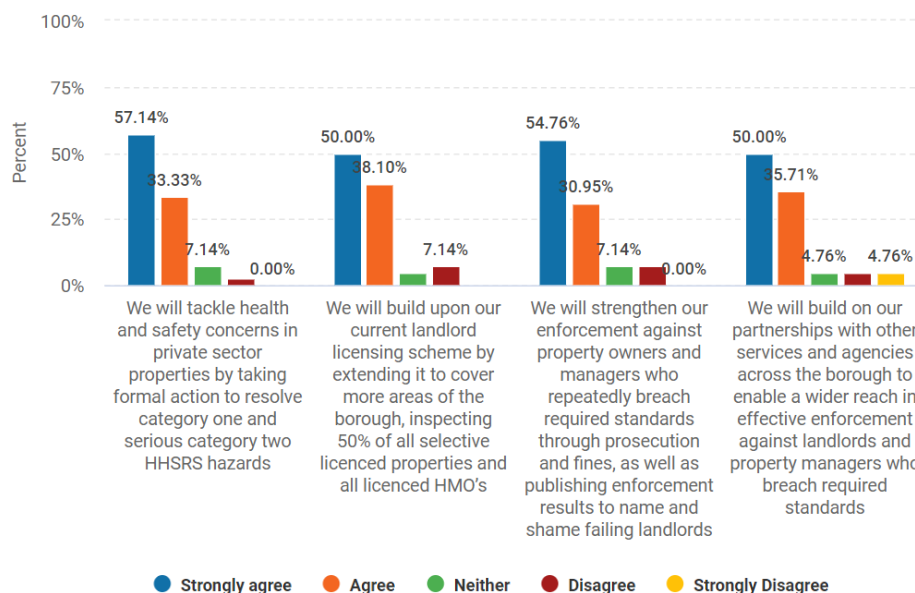
- 2.1 76% of respondents agreed that Commitment 1 (“we will work to increase the supply of private sector homes available in Brent so it is an accessible housing option for residents”) should be a priority included in the strategy.
- 2.2 The below table shows how far respondents felt that the proposed actions under the commitment would achieve the desired outcome.



- 2.3 Points 2.4 – 2.6 cover the qualitative feedback received for Commitment 1 through the in-person engagement activities.
- 2.4 Shared ownership is not an option for low-income households and also need to consider that increasing shared ownership in the borough doesn't mean more homes for Brent residents, often this means non-Brent resident moving into the borough.
- 2.5 Empty Dwelling Orders are less effective than Compulsory Purchase Orders (CPO) when it comes to tackling empty properties in the borough. Can we use CPO's more effectively?
- 2.6 Can the Council do more to push back on S106?

Commitment 2

- 2.7 90% of respondents agreed that Commitment 2 (“We will effectively tackle poor property conditions across the Private Sector in Brent”) should be a priority included in the strategy with over 80% also agreeing that all three proposed actions would support achieving this commitment.
- 2.8 The below table shows how far respondents felt that the proposed actions under the commitment would achieve the desired outcome.

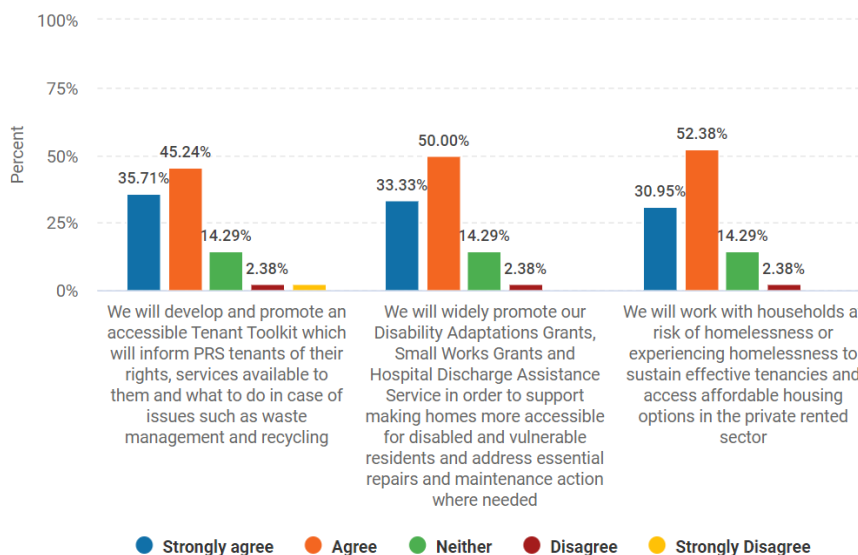


- 2.9 Points 2.10 – 2.15 cover the qualitative feedback received for Commitment 2 through the in-person engagement activities.
- 2.10 Positive engagement with landlords is vital, could the strategy include this? Particularly in relation to reducing stigma and supporting them with advice and guidance on their responsibilities, implications of new legislation etc.
- 2.11 Could the licensing scheme have reduced licenses in place for landlords where issues have been identified?
- 2.12 How will the Council ensure that the increased costs to landlords re. the licensing scheme isn't passed on to tenants?

- 2.13 Clearer definition needed on what we mean by ‘formal action’. Pre-action doesn’t protect from retaliatory eviction and doesn’t allow for a fine later down the line. There should be stronger commitment to use of Improvement Notices.
- 2.14 What happens to landlords who haven’t made a license application before 1 April 2024 and what is the Councils plan for these landlords?
- 2.15 Consider removing the word “repeatedly” from proposed action 3, it shouldn’t need to be repeated breaches that trigger action, it should be any breach.

Commitment 3

- 2.16 83% of respondents agreed that Commitment 3 (“We will prioritise supporting residents to access and stay in their private-sector home, living safe and comfortable lives”) should be a priority included in the strategy, with over 80% also agreeing that all three proposed actions would support achieving this commitment.
- 2.17 The below table shows how far respondents felt that the proposed actions under the commitment would achieve the desired outcome.



- 2.18 Points 2.19 – 2.21 cover the qualitative feedback received for Commitment 3 through the in-person engagement activities.
- 2.19 The Tenants Toolkit should come from an agency other than the Council, to avoid negative stigma associated with the Council. The toolkit development should consider how tenants can be encouraged to act on their rights, its one thing to know what they are, another to have the confidence to act on them as needed.
- 2.20 Key external partners should be engaged with re. development of the Tenants Toolkit content.
- 2.21 How is the Council keeping tenants informed on the Renters Reform Bill? There should be very clear comms about the implications of this and changes to their rights and how they can challenge appropriately.

3.0 Further general feedback

- 3.1 Some of the strategies proposed actions are just repeating the statutory duties that the Council already has – can it be strengthened?
- 3.2 Concerns raised around the barriers put in place by Letting Agents including ‘no children’ rules on family homes, income thresholds, credit score checks etc. and highlighted that Letting Agents had not been considered in the draft strategy.
- 3.3 Improve links with Trading Standards to ensure effective signposting processes are in place.
- 3.4 When an Officer leaves in Housing Needs – this should be communicated to the individuals whose cases they are managing, with details of their new case officer.
- 3.5 PHP’s could be more robust in communicating what the Officer is doing on behalf of the tenant.

Appendix 3 Brent – Private Sector Housing Strategy – Delivery Plan

Action	Proposed timescale	Responsible service	Success measures	Update
Commitment 1: We work to increase the supply of private sector homes available in Brent so it is an accessible housing option for our residents				
Commission a study into the demand for Shared Ownership and best practice within the sector to establish a 'Brent Shared Ownership' standard for all new builds in the borough	TBC by Affordable Housing and Partnerships	Affordable Housing and Partnerships	TBC by Affordable Housing and Partnerships	
Promote the work of our Housing Initiatives Team who work with property owners and developers to discuss available options for their empty properties and offer Empty Property Grants which helps to provide homes for homeless families	Ongoing	Private Housing Services	Number of empty properties refurbished and brought back into use within the borough (Target of 100 per year)	
Pursue owners of empty properties and take enforcement action where necessary to ensure that they do not allow their properties to fall into disrepair	Ongoing	Private Housing Services	Number of empty properties refurbished and brought back into use within the borough (Target of 100 per year)	
Commitment 2: We effectively tackle poor property conditions across the private sector in Brent				
Tackle health and safety concerns in private sector properties by taking formal action to resolve category one and serious category two HHSRS hazards	Ongoing	Private Housing Services	Number of properties improved as a result of action taken by PHS	

			(Target of 2000 per year)	
Build upon our current landlord licensing scheme by extending it to cover more areas of the borough, inspecting 50% of all selective licenced properties and all licenced HMO's	2029	Private Housing Services	Number of HMO's licensed in the borough (6000 per year) Number of selectively licensed properties (6000 per year)	
Strengthen our enforcement against property owners and managers who breach required standards through prosecution and fines, as well as publishing enforcement results to name and shame failing landlords	Ongoing	Private Housing Services	Number of enforcements taken i.e. prosecutions, fines or banning orders	
Build on our partnerships with other services and agencies across the borough to enable a wider reach in effective enforcement against landlords and property managers who breach required standards.	Ongoing	Private Housing Services	NA	
Strengthen signposting processes between the service and Trading Standards who can help to raise awareness of, and take enforcement action against, rogue landlords, letting agents and property management businesses.	Q1 2025-26	Private Housing Services	Number of cases referred to Trading Standards	
Increase awareness of, and prioritise, the engagement work the service does with local landlords, including offering training and promoting accreditation opportunities.	Ongoing	Private Housing Services	Number of landlord engagement events and training	

			Number of landlords engaging with an event or training	
Commitment 3: We prioritise supporting resident to access and stay in their private sector home, living safe and comfortable lives				
Develop and promote an accessible Tenant Toolkit which will inform PRS tenants of their rights, services available to them and what to do in case of issues such as waste management and recycling	Q1 2025-26	Private Housing Services	TBC	
Widely promote our Disability Adaptations Grants, Small Works Grants and Hospital Discharge Assistance Service in order to support making homes more accessible for disabled and vulnerable residents and address essential repairs and maintenance action where needed	Ongoing	Private Housing Services	Number of private adaptation referrals received	
Include ongoing advice and guidance about developing legislation and what this means for private sector tenants and local landlords in ongoing communication plans to ensure we're keeping residents informed	Ongoing	Private Housing Services	NA	
Work with households at risk of homelessness or experiencing homelessness to sustain effective tenancies and access affordable housing options in the private rented sector	Ongoing	Housing Needs	Number of duties discharged to the private sector	

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EQUALITY ANALYSIS FOR PHS DRAFT STRATEGY

POLICY/PROPOSAL:	PRIVATE HOUSING SERVICES DRAFT STRATEGY
DEPARTMENT:	HOUSING SERVICES
TEAM:	PRIVATE HOUSING SERVICES
LEAD OFFICER:	TRIZA HANDA – HEAD OF SERVICE
DATE:	10 June 2024

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 Private Housing Strategy has been written to help deliver the Council's wider borough plan to Move Brent Forward Together. The strategy sets out how we will work to deliver our vision for the private housing sector in Brent, to ensure they are a safe, stable, and accessible housing option for our residents.

This strategy examines how we access the private sector housing stock and how we regulate standards within the sector to ensure rented properties are well managed and maintained to high standards and tenancies sustained.

Neglected and vacant buildings can create a sense of insecurity and negatively impact the safety and perception of neighbourhoods when they become targets for vandalism, squatting, and other illegal activities. The strategy also considers how the Council addresses the wasted resource of empty properties, which contributes to housing shortages in Brent.

The strategy considers the importance aides, adaptations and other assistance provides in allowing elderly and vulnerable residents to continue to live at home and see improvements in both their health and wellbeing through the provision of various grants.

Objectives:

The PSH strategy proposes 3 overarching commitments, with actions that are required to ensure effective delivery.

The commitments and actions, that can be found in *Appendix 3-the Draft Action Delivery Plan*, have been developed following extensive consultation with our stakeholders, with some actions developed directly as a result of that consultation. Details on the result of that consultation is attached in *Appendix 2 Consultation feedback*. Each commitments have actions that will ensure its delivery and targets that will be monitored by performance indicators.

The 3 commitments are.

1. We work to increase the supply of private sector homes available in Brent, so it is an accessible housing option for our residents.
2. We effectively tackle poor property conditions across the private sector in Brent.
3. We prioritise supporting residents to access and stay in their private-sector home, living safe and comfortable lives.

Intended outcome:

The strategy priorities a resident-centred approach to providing services, and when delivered, will ensure a safe, stable, and accessible private housing sector in Brent.

- By focusing on increasing the range and supply of homes available in the private sector across Brent, more people who need a home will be able to access one that meets their needs.
- Tackling poor property conditions and challenging under-performing landlords in the borough will ensure the safety of residents and improve their health and wellbeing within their home.
- Providing advice, guidance and support to private sector residents will empower them to know their rights, obligations and so manage their tenancies confidently.
- Greater focus on the support available for disabled and vulnerable residents will also enable more people to remain living independently in their home for longer.

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

We anticipate that that majority of our residents will be positively affected by the proposals within the strategy.

Tenants and Residents of Privately owned homes:

- Overall, tenants will benefit from an improvement of their living conditions and better standards of property management.
- The property licensing system has a process for eliminating discriminatory practices by landlords and property managers. Tenants will also feel empowered through the information and support that the Council is able to provide and will report poor conditions or able to take their own actions as may be appropriate.
- Occupiers of privately owned properties will be able to access services more easily and benefit from a wide range of support that is available for them to continue to live in their own homes for as long as they would like to.

Landlords and property managers:

- The proposed engagement with local landlords, which includes offering training and promoting accreditation opportunities will be beneficial landlords and those who manage properties in Brent.
- Tackling empty properties will benefit both residents, as well the owners of those properties who may sometimes lack resources to help bring the properties back to good use.

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

Yes, as explained below:

- **Equality Duty:** The Private Sector Housing Strategy, seeks to provide a safe, stable, and secure accommodation to all residents. The strategy contributes to the Council's equality objectives to ensure that all our current and future residents, staff and stakeholders are treated fairly and receive appropriate services and equal opportunities regardless of their protected characteristics (age, disability, ethnicity (including nationality), gender, gender identity and expression, marital / civil partnership status, pregnancy / maternity, religion or belief, sexual orientation), childcare and/or caring responsibilities, health and income status.

The work that is already underway to build new partnerships and strengthen the existing ones, will improve access to services to residents. We are also proposing to reach more residents through the landlord & tenant engagement programmes that we have already started, as well as promoting more widely, our adaptation services.

Further to the above, the associated strategies such as *Borough-wide selective licensing scheme* undertook a full EIA and considered the population of the whole borough.

- **The Council's Diversity and Inclusion** strategy aims to place Brent's communities, businesses, and workforce at the heart of everything we do, and to tackle inequalities and support individuals and families to reach their full potential.

The strategy proposes to priorities a resident-centred approach to providing services. The proposals in the strategy are a response to the views and desires of residents, including business communities, whom we consulted during the development of the strategy. The teams that will deliver the proposals in the draft strategy are diverse and have been equipped with resources they need to deliver the objectives within the strategy.

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 evidence that has been used to draft the strategy has been taken mainly from the consultation done during application for borough-wide selective licensing application. This was one of the most recent surveys taken by the Council which looked at the whole of Brent's private sector and reported on the condition of PRS, demographics of renters and issues that affected them the most at home. The relevant reports used for this analysis is presented as:

- **Licensing Consultation Report:** This involved consultation with residents, local businesses, landlords, managing agents and other stakeholder over a 12-week period. The survey found general support, across all groups for licensing as an efficient way of improving property conditions. There was also agreement, that previous similar schemes in the borough had improved matters with regards to waste reduction and the support given to landlords.

- **Brent's EIA for Selective Licensing:** This exercise was undertaken to examine the impact of introducing licensing scheme covering the whole borough.
- **Private Rented Sector Stock Modelling Report 2022-** This report examined the state of Brent's housing stock and undertook a detailed review across the borough to assess housing stressors relating to key tenures, particularly within the private rented sector.
- **PHS Draft Strategy Consultation Feedback Summary– Appendix 3:** Offered views of our residents and all stakeholders on the proposed commitments and effectiveness of the proposed actions to deliver the strategy.

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

<p>Details of impacts identified</p>	<p>According to Brent's 2021 Census, there has been an increase of 20.9% in people aged 65 years and over, an increase of 9.2% in people aged 15 to 64 years, and an increase of 2.8% in children aged under 15 years. These figures are expected to grow.</p> <p>The proposal made in the draft strategy is intended to enhance housing management standards in the private sector, which will have a positive impact on all age groups.</p> <p>The proposal to widely promote our Disability Adaptations Grants, Small Works Grants and Hospital Discharge Assistance Service will provide comfort and stability for vulnerable residents of all ages.</p> <p>Residents of all ages will particularly benefit from health interventions have been proposed in the draft. Issues such as e.g., damp and mould, infections, reduction of falls as well as the requirements around excess cold, which can cause or exacerbate poor health will be addressed by the proposal to tackle poor property conditions.</p>
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DISABILITY

<p>Details of impacts identified</p>	<p>The Equality Act defines disability as a physical or mental impairment that has a "substantial and long-term adverse effect" on the ability to carry out normal day-to-day activities. Figures from the latest census of England and Wales show that 41,163 people in Brent said they had such an impairment as of March 2021; this is equivalent to 14.7% of Brent's population.</p> <p>The proposal to introduce borough-wide licensing scheme, will be beneficial in that, landlords will be more aware of their duties under the Equality Act 2010 and of the needs of disabled people. The scheme, which is expected to bring a further 40,000 rented properties</p>
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	<p>under licensing regulations, will result in property improvement as well as opportunities to provide residents with information from our partnerships, including the access to different types of Grant Facilities available for disabled residents.</p>
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RACE

<p>Details of impacts identified</p>	<p>According to the latest 2021 census, the population in Brent is as follows:</p> <p>White - 117,701 people or 34.6%</p> <p>Asian - 111,515 people or 32.8%</p> <p>Black - 59,495 people or 17.5%</p> <p>Other - 33,861 people or 10.0%</p> <p>Mixed - 17,249 people or 5.1%</p> <p>The main aim of this draft strategy is to put the needs of our residents at the heart of what we do. The proposal to increase awareness of, and prioritise the engagement work the service does with local landlords, will offer opportunities for landlords through the training we will provide and support with their businesses.</p> <p>The proposed Toolkit which all residents will be able to use, will help to inform residents of their rights and services available to them.</p>
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SEX

<p>Details of impacts identified</p>	<p>There were no direct comments made in relation to sex and we do not envisage any negative impact on the draft strategy on this factor. However, one of the aims of the strategy is to tackle antisocial behaviour, including hate crime and incidents and this is likely to have a positive impact on this characteristic.</p>
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SEXUAL ORIENTATION

<p>Details of impacts identified.</p>	<p>The strategy is likely to have a positive impact on someone in this category, who may be likely to experience harassment, in form of name-calling, graffiti, and criminal damage, which can cause extreme distress and fear, with people often too frightened to leave their own home.</p> <p>One of the aims of the strategy is to tackle antisocial behaviour, including hate crime and incidents and this is likely to have a positive impact on this characteristic. The proposed Tenant Toolkit which will inform PRS tenants of their rights and services available to them will help high the issues and access to support services.</p>
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PREGANCY AND MATERNITY

Details of impacts identified:	The private sector plays an important role being a key source of temporary and permanent accommodation to meet it. The proposals in this strategy will play a significant role in ensuring that the sector is well managed and provides settled and decent accommodation for Brent residents.
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RELIGION OR BELIEF

Details of impacts identified	There were no direct comments made in relation to religion or belief and we do not envisage any negative impact on the strategy on this factor. However, tackling antisocial behaviour, including hate crime and incidents is likely to have a positive impact on this characteristic.
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GENDER REASSIGNMENT

Details of impacts identified	<p>Brent's census 2021 found that those identifying as transgender were represented in all age groups though in general, the transgender population had a slightly younger age profile when compared to the population generally. The percentage who were transgender was highest among the 35-44 age group (1.7%) and lowest among those aged 75 and over (0.6%).</p> <p>The strategy will have no direct impact on this group, however, the support system that will be provided through the partnership work proposed and the awareness of tenants rights will support equality aims for this group.</p>
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MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	There were no direct comments made in relation to marriage & Civil Partnership, and we do not envisage any negative impact on the strategy on this factor. However, the proposal to promote the work with property owners and developers to discuss available options for their empty properties and offer Empty Property Grants which helps to provide homes for expanding population.
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3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?
NO

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

Yes. The respondents to the consultation were diverse by area, tenure, age, and ethnicity – and so the views (taken together) were broadly representative of Brent residents and so no further engagement would be required.
--

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 proposed objectives have given KPIs that will be monitored.

SECTION C - CONCLUSIONS

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

This analysis has concluded that, overall, the proposed commitments made in the Private Sector Housing Strategy, and the accompanying action plan that will ensure its delivery, is likely to bring benefits to all stakeholders and enhance the work that PHS already do.

The proposed commitment to effectively tackle poor property conditions across the private sector in Brent is likely to impact positively on groups with protected characteristics, particularly those who are disadvantaged and who have little or no choice but having to rent in the private sector. Licensing, which we have introduced across the borough can be extended if it can show, with good evidence the positive impact the scheme has made to residents in PRS.

The proposal to prioritise supporting residents to access and stay in their private-sector home, living safe and comfortable lives, will impact positively on all residents, not just those in PRS, and in particular, the disabled residents and vulnerable adults.

All groups will benefit from improvements in engagement, communication and signposting information between the council and other service providers who may be able to provide the required support.

we do not envisage any negative impact of the proposals on the “Equalities” characteristics of people in Brent.

SECTION D – RESULT

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

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	“X”
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

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.


- **See attached Appendix 3 Brent – Private Sector Housing Strategy – Delivery Plan**

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	TRIZA HANDA
REVIEWING OFFICER:	
HEAD OF SERVICE / Operational Director:	Spencer Randolph – Director, Housing Services

 Brent	Cabinet 17 June 2024
	Report from the Corporate Director of Partnerships, Housing and Resident Services
	Lead Member(s) – Cabinet Member for Environment & Enforcement (Councillor Krupa Sheth) Cabinet Member for Children, Young People and Schools (Councillor Gwen Grahl)
Travel Assistance Policy – update on formal consultation	

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
List of Appendices:	Three Appendix 1: Travel Assistance Policy Appendix 2: Consultation Feedback Summary (survey) Appendix 2.1 Consultation Feedback Summary (coding)
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Pauline Jones, Head of Strategic Support Pauline.Jones@brent.gov.uk

1.0 Executive Summary

1.1 This report provides a progress update on the development of the new Travel Assistance Policy (as detailed in Appendix 1 of the report). It includes a summary of the responses received to the recent public consultation carried out and seeks Cabinet approval, prior to final publication.

2.0 Recommendation(s)

- 2.1 That Cabinet note the consultation response and subsequent changes to the drafted policy.
- 2.2 That Cabinet provides any comments or feedback on the updated policy.
- 2.3 That Cabinet approves the Travel Assistance Policy for final publication.

3.0 Detail

3.1 Cabinet Member Foreword

3.1.1 Home to school travel assistance exists to support children and young people with Special Educational Needs and/or disabilities who may find it difficult to travel to school or college without the help of assistance from the local authority. The Council's provision of travel assistance is an essential part of enabling this ongoing access to education.

3.1.2 The Travel Assistance Policy aligns especially with the following Borough Plan priorities:

- A Cleaner, Greener Future
- The Best Start in Life
- A Healthier Brent

3.1.3 The Travel Assistance Policy forms part of Brent's Long Term Transport Strategy and Healthy Streets programme. The policy encourages more active travel, including walking and cycling, in order to support children and young people to have healthy lifestyles.

3.1.4 The policy also works to make sure that access to education is fair and equal for children and young people with SEND and continues to support opportunities for post-16 skills development for young people with SEND.

3.2 Background

3.2.1 In June 2023, the Department for Education (DfE) released new guidance in respect of travel to school for children of compulsory school age. This triggered a review of Brent Council's current Travel Assistance policy, which dates back to 2013. The Council has also taken into account the DfE's January 2019 statutory guidance for young people in post-16 education.

3.2.2 In response to this new guidance, the Council drafted a new Travel Assistance policy. The draft policy was submitted to senior management and Lead Members prior to approval being given to launch a public consultation in February 2024.

3.2.3 The public consultation took place over a 6-week period, from 4th March until 14th April 2024 and a summary of the feedback from the consultation can be found in Appendix 2. Activities carried out as part of this consultation to ensure all key stakeholders were offered an opportunity to provide feedback were:

- Social media promotion of the proposed strategy and routes to provide feedback.
- An online feedback survey where the draft policy was shared.
- Face-to-face engagement with over 40 parents/carers via four online drop-in sessions and four in-person drop-in sessions.
- Focus groups with key external partners.
- Internal promotion of the consultation through Viva Engage and internal screens.
- Promotion of the consultation via online flyers, letters/emails and SMS sent to all parents/carers.

3.2.4 The Policy has been attached as Appendix 1 along with a summary of the responses received to the recent public consultation carried out (Appendix 2) with final approval now being sought for publication.

4.0 Current Service Feedback

4.1 The below sections summarise feedback from the consultation drop-in sessions and online survey.

4.2 Positive feedback

4.2.1 Many parents only had positive things to say about the Brent Transport service. In particular, examples of good management and effective communication about changes to the service were highlighted. Several parents communicated that text messages or SMS were well-received for this objective.

4.2.2 Also central to many parents' positive experiences of Travel Assistance was a strong rapport and sense of trust between themselves and the staff on motorised transport, especially those who engage well with the children and young people on the service (drivers and escorts).

4.2.3 Another positive theme of note was that the Travel Assistance service was key for several families in enabling different members of the family to access education, employment and/or training.

4.3 Negative feedback

4.3.1 On the other hand, several areas for improvement were also highlighted.

4.3.2 Many parents feel that journey times on motorised transport are too long, leaving children and young people overstimulated by the time they arrive at school or home.

4.3.3 Another key theme was that changes or disruptions to the service have been poorly communicated to parents. Parents report that they are frequently not made aware of delays in transporting their child(ren), changes to staff and escorts, and changes to pick-up and drop-off times.

- 4.3.4 Concerns were also raised around the quality of training that staff who provide Travel Assistance receive. Parents fed back that they would be keen to have details of the training undertaken by the staff.
- 4.3.5 Some parents are dissatisfied by Brent's mileage allowance. The reasoning given for this was that the allowance does not account for time to get onto transport, time spent in traffic, or petrol costs.
- 4.3.6 A final area of review was for travel assistance arrangements to be more flexible. Several families felt that combined support offers would be a welcome change, especially in facilitating children and young people's access to extra-curricular activities after school. For example, one family said they would like motorised transport in the mornings for home-to-school transport but would like to arrange their own transport for school-to-home transport with the support of a Personal Travel Budgets.

5.0 Consultation response and amendments made to the policy.

5.1 Applications and Appeals

- 5.1.1 Feedback on the revised application and appeals processes largely centred on wanting more clarity around how decisions are made and to whom the new policy applies.
- 5.1.2 Parents found the idea of an impartial panel to be a good idea, and the clearer and shorter timeframes for decisions to be helpful.

6.0 Feedback on Additional Sections of the Revised Policy which have been amended.

Context section

- 6.1 Most parents consulted felt that this section was well-written. Their main request was for the wording of the final paragraph to be reviewed in order to emphasise that the Council acknowledges that independence might not be possible for many children and young people. This has been actioned.

Part 3: Young Persons of Sixth Form Age

- 6.2 Parents felt that Part 3 of the proposed policy did not consider broader reasoning why a young person might wish to attend a school/college outside of the borough. Packages of support and how an educational setting might otherwise meet a young person's needs were highlighted as examples of such reasoning.

Behaviour and Conduct section

- 6.3 Parents' feedback was that the policy should be clearer about the kinds of behaviour to which it refers. There was a tension between wording that meets the needs of children who have been subjected to challenging behaviour, and

wording that meets the needs of children who have enacted challenging behaviour.

- 6.4 There were also concerns raised about the application of this section of the policy to children and young people with complex needs but no EHCP.
- 6.5 Other parents were keen to see clear procedures for dealing with bullying, harassment, and abuse on motorised transport.

7.0 Independent Travel Training

- 7.1 Almost all consultation attendees agreed there was a strong appetite for an Independent Travel Training programme (ITT), especially in conjunction with developing better access to community spaces for young people with SEND. This is also reflected in the survey feedback, with 80% of respondents fully or somewhat agreeing with the Council's approach to promote independence through the development of an Independent Travel Training Programme.
- 7.2 The main caveat to positive sentiments around ITT was anxiety around expectations of independence for all children and young people. Parents were concerned that ITT would not be suitable for all children and young people, and assurance was provided that we acknowledged that all children would not be in a position to partake in the training programme.
- 7.3 There was a significant amount of feedback on the content parents wanted to see in the programme, and how this information might be best delivered to young people. Many parents and carers were keen to be involved in the ITT programme to continue supporting their children's learning after the training's end.
- 7.4 Consultation sessions were undertaken with young people at Woodfield School and The Village School. The young people were enthusiastic about independent travel. They were keen to learn how to overcome disruptions or unexpected events during journeys.
- 7.5 As part of the consultation process, young people said that they want to progress from school to college and then from college to university. Parents have also said that 'being healthy' is an important aspect of young people's futures. Initiatives such as Independent Travel Training could be implemented to support the transition from school to college and to support the commitment Brent Council has made in the SEND strategy to provide travel training.
- 7.6 There are several health benefits of walking; enabling a child to walk to and from school will affect a sustainable and significant increase in physical activity. Some of the benefits of this include physical development such as strengthening muscles and bones, maintenance of a healthy weight and improved cardiovascular health.
- 7.7 The development of the Independent Travel Training programme sets out to further develop independence skills, improve the confidence and self-esteem

of our young people, and ultimately reduce the strain on parents/carers and support services by equipping young people with the skills they need for adulthood. These skills also crucially include how to make journeys safely, taking into account risk and danger awareness, and also encourage healthier choices such as walking and cycling as opposed to single-occupancy car journeys. Access and movement throughout the borough are supported by Boroughwide and Nuisance Vehicles Public Spaces Protection Orders (PSPOs). PSPOs aim to mitigate nuisance and dangerous behaviours, such as racing, causing obstructions, littering, and aggression.

- 7.8 Travel assistance is one part of a package of support offered to children and young people with SEND in the borough through the Local Offer. The Local Offer provides information, support and advice on a number of topics including:
- Finding the right school or college.
 - SEND support in mainstream education.
 - Local health services, including occupational therapy and support with mental health and emotional wellbeing.
 - Social care services for children and young people with SEND and support for parents and carers.
 - Financial support for children with SEND and their families.
 - Activities, clubs and sports for children and young people with SEND.
 - Short breaks and respite for families.
- 7.9 Workshops are taking place to determine the next steps for ITT, including liaison with Procurement, the development of a business case, and securing of funding from Public Health grants.

8.0 Transport for London (TfL) Support

- 8.1 Brent Council and Transport for London's Local Communities and Partnerships Team have been in contact to discuss how TfL might be able to support the provision of travel assistance in the borough. However, there are many existing TfL accessibility arrangements upon which the Council might build. These include, but are not limited to:
- Travel Mentoring service, where travel mentors offer practice journeys and guidance for planning and making journeys.
 - Travel Support Cards, which help people to communicate any assistance or information requirements they have to staff.
 - Mobility Aid Recognition Scheme, which helps passengers to check if their mobility aid is suitable to travel on buses.
 - Freedom Passes and concessionary travel.
 - Planning a step-free route.
 - Staff training on providing assistance to passengers, including guiding visually impaired customers by the arm and helping wheelchair users get on and off trains.
 - Provision of accessible resources including maps and guides.
 - Taxicard, which is a subsidised scheme for people using taxis and minicabs.
 - Community Transport and Dial-a-Ride, which can provide door-to-door transport for people who cannot use mainstream public transport.

- National Passenger Assist service, which allows passengers to request an assistance booking in advance.

8.2 In addition to the above, there are a number of funding schemes available that the Council may wish to make use of, including 'Liveable Neighbourhoods,' 'Cycle training funding,' and 'Bus Priority.'

9.0 Proposed Key Changes to the Policy and Delivery Model

9.1 Travel Assistance is currently referred to in Brent as "transport". The existing School Transport Policy developed with partner boroughs in the West London Alliance already emphasises the importance of inclusion and independence in Travel Assistance programmes.

9.2 Identifying travel support needs, and the management of parent expectations should begin at the point of initial assessment and in the development and then re-assessment of Education, Health and Care Plans (EHCPs). The identification of alternative travel support, and the benefits of travel training should be considered for adult passengers by the Independent Travel Training programme as well as SEN Support Team.

9.3 The proposed changes and development of the new Policy has been carried out in collaboration with colleagues in Children and Young People and Neighbourhoods and Regeneration. The proposed Policy has also been discussed at Children and Young People's Operational Children's Services Leadership Team on several occasions and updates have been implemented accordingly.

9.4 As well as the formal consultation process, officers have attended several parent-carer forums. Discussions about the proposed policy have been constructive and helpful feedback has been received which has fed into the draft policy. The policy aims overall to support the offering of a wider range of travel assistance options, including Independent Travel Training (with a travel pass on completion) and Personal Travel Budgets, which recognise that children using the service have differing levels of need and that families' arrangements may require differing levels of flexibility.

10.0 How the policy affects the whole family.

10.1 The London Borough of Brent Travel Assistance Policy for 0-25 in Education sets out to support eligible children and young people with special educational needs and disabilities (SEND) to attend educational settings, reduce the proportion of children and young people who are not in education, employment or training (NEET), and promote independence in order to better prepare young people to enter adulthood feeling confident and engaged in their futures.

10.2 The transport arrangements provided by the Council support families to ensure their children can attend school/college. This provision helps to ensure that, among others, families that are structurally disadvantaged are best supported to achieve punctual school attendance:

- Families with multiple children, each with individual school arrangements.
- Families where parents/carers have commitments to work, education or training.
- Families where parents/carers are disabled or have complex needs.
- Families from low-income households.
- Families where parents/carers are young people themselves.

11.0 Stakeholder and ward member consultation and engagement

11.1 These details have been set out above.

12.0 Financial Considerations

12.1 The Brent Transport Service budget for 2024/25 is £13.2m.

12.2 A programme of works which align with the changes set out in the proposed policy are anticipated to result in a reduction of costs to support the current budget pressures in the department. Any savings will be incorporated into the Medium-Term Financial Strategy as part of the budget setting process.

13.0 Legal Considerations

13.1 Under section 508B of the Education Act 1996 local authorities have a duty to ensure that suitable travel arrangements are made, where necessary, to facilitate attendance at school for eligible children. Schedule 35B of the Act defines eligible children – those categories of children of compulsory school age (5-16) in an authority’s area for whom free travel arrangements will be required. These include children living more than the statutory walking distance from the nearest suitable school and children who cannot reasonably be expected to walk to school (accompanied as necessary) due to SEN or disability or mobility problems or due to the nature of the route to school. There is a power to make travel arrangements for other children under section 508C of the Act. The authority is required to have regard to the statutory guidance in relation to the discharge of its functions under sections 508B and 508C.

13.2 The statutory responsibility for transport for 16–19-year-olds (who have started a course before their 19th birthday) rests with local authorities. Local authorities have a duty to prepare and publish an annual transport policy statement specifying the arrangements for the provision of transport, or otherwise that the authority considers necessary, to make to facilitate the attendance of all persons of sixth form age receiving education or training.

13.3 The sixth form age duty applies to young people of sixth form age and young people with EHCPs up to age 25 where they are continuing a course started before their 19th birthday. The Post-16 transport and travel support to education and training statutory guidance for local authorities published in January 2019 states that a transport policy statement must be published by the local authority by 31st May each year and must be clearly dated showing the academic year to which it applies.

14.0 Equity, Diversity & Inclusion Considerations

- 14.1 The Council must, in the exercise of its functions, have due regard to the need to:
- Eliminate discrimination, harassment, and victimisation.
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it, pursuant to s149 Equality Act 2010. This is known as the Public Sector Equality Duty.
- 14.2 The Public Sector Equality Duty covers the following nine protected characteristics: age, disability, marriage and civil partnership, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 14.3 The purpose of the duty is to enquire into whether a proposed decision disproportionately affects people with a protected characteristic. In other words, the indirect discriminatory effects of a proposed decision. Due regard is the regard that is appropriate in all the circumstances.
- 14.4 The proposals in this report have been subject to screening. There are no proposed strategic delivery changes to the approach to delivering special needs transport that would cause any adverse equalities impact. A further equalities impact assessment will however be undertaken as part of a subsequent report seeking authorisation to formally implement any changes to the delivery model and/or policy.

15.0 Climate Change and environmental Considerations

- 15.1 Independent and active travel not only has positive benefits to the physical and mental wellbeing of service users, it also has a positive impact on the environment as it reduces the number of vehicles completing overlapping trips. A shift towards active travel would ensure that the policy changes more closely align with the council's existing environmental sustainability objectives and key strategy documents such as the Climate and Ecological Emergency Strategy, Air Quality Action Plan, Long Term Transport Strategy, Health and Wellbeing Strategy and Active Travel Implementation Plan.
- 15.2 Enabling service users to travel on public transport will mean fewer in-house buses will need to be bought, operated, and maintained. At present these buses are diesel, and although electric alternatives are being explored it is unlikely that affordable options will be available at scale within the next few years. It should also be noted that electric buses will still have a whole-life carbon cost owing to the production process, but this would be considerably lower than the emissions caused from the existing level of diesel journeys, and electric buses would have a significant positive impact on improving air quality in the borough.

15.3 Delivery of the updated policy could also reduce the number of point-to-point trips completed by contract carriers. The exact environmental impact of these journeys is hard to calculate owing to the multitude of different vehicles being used. We do know in general terms however that per passenger these routes are likely to have a higher carbon output than in-house buses owing to the smaller number of service users per vehicle. There may also be a long distance between the contractor's origination point and the pick-up and drop-off locations.

16.0 Human Resources/Property Considerations (if appropriate)

16.1 This report has no impact on staffing or property.

17.0 Communication Strategy Considerations

17.1 A communication plan has been developed, which incorporates a clear communication strategy and demonstrates how we plan to engage those who will be affected by the new Policy.

17.2 The plan will utilise channels such as the Head Teachers' bulletin to communicate the upcoming changes with schools.

17.3 Workshops will also be held with frontline staff involved in the coordination of travel assistance, such as social workers, healthcare professionals, and customer services officers, to inform them of the changes to the policy. This will especially centre on the ways in which travel assistance is offered to children and young people.

17.4 All service users will be informed of the upcoming changes and provided with details on how they will be affected. Communication assets will include a summary report on the outcomes of the consultation period, an FAQs document, and updated information on the Local Offer website.

17.5 The messaging throughout will be clear and concise with a focus on promoting independence and a healthy active lifestyle.

Report sign off:

Peter Gadsdon

Corporate Director – Partnerships, Housing and Resident Services



**London Borough of Brent Travel Assistance
Policy for Children and Young People aged 0-
25 in Education**

DRAFT



Review date: May 2024

DRAFT



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1. INTRODUCTION

- 1.1 This Travel Assistance Policy sets out the travel to school/college assistance available through Brent Council in line with the June 2023 statutory guidance¹ from Department for Education in respect of children of compulsory school age and January 2019 statutory guidance² for young people in post-16 education.
- 1.2 This policy considers transport arrangements for eligible children with Special Educational Needs (SEN) and disabilities and has been written with reference to the Education Act 1996 ('the Act'), the SEN and Disabilities 0-25 Code of Practice (2001) ("the Code"), the Children and Families Act 2014, the Children Act 2004 and the Disability Discrimination Act 2005 and the Equality Act 2010.
- 1.3 This policy also reflects the ambitions of the Brent SEND (Special Educational Needs and Disabilities) Strategy 2021-2025, the ambitions in the Department for Education (DfE) SEND and Alternative Provision Improvement Plan: Right Support, Right Place, Right Time; and 2015 Code of Practice. It proposes that wherever possible children with special educational needs and disabilities or those who require alternative provision, will attend local mainstream provision. This means fewer children will need to travel long distances to a school that is able to meet their needs.
- 1.4 At the heart of this policy are two key principles which underpin a culture of providing travel assistance: promoting independence including supporting young people to travel independently and maintaining quality of life. By working in partnership with parents/carers/guardians, children and young people, schools and the voluntary sector, Brent Council (the Council) hopes to secure the right option for each child/young person, so they are better prepared to enter adulthood confidently as active participants in society.

2. CONTEXT

- 2.1 The legal basis for this policy and the provision of home to school transport is set out in sections 508A, 508B and Schedule 35B, 508C, 508D and 509AD of the Education Act 1996 (as amended by Part 6 of the Education and Inspections Act 2006) and, where appropriate, the Equality Act and English and European case law.
- 2.2 Parents/carers/guardians are responsible for ensuring that their children attend school regularly. However, under the Education Act 1996 and the Education and Inspections Act 2006, local authorities have a duty to provide assistance with travel to and from qualifying schools/college for children and young people aged 5-16 in certain circumstances.

1

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1165730/Travel_to_school_for_children_of_compulsory_school_age.pdf

2

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/772913/Post16_transport_guidance.pdf

- 2.3 In addition, Brent also has a duty to facilitate access to full-time education for young people aged 16-19 and this may include assistance with travel in certain circumstances. Other post-16 learners with special educational needs and/or disabilities aged 19-25 attending colleges and other places of learning may be eligible for assistance.
- 2.4 The Council is only required to provide free school travel to children residents within the administrative area of Brent who are eligible under the law and this policy. If children or young people move to an address outside the administrative area of Brent the responsibility for determining and, where appropriate, providing free or assisted travel passes to the child's new home authority. Those who are not resident in Brent are advised to contact their own home local authority for details of any policy that their local authority may have regarding home to school/college transport.
- 2.5 Parent/s, legal guardian/s or carer/s have a legal duty to make necessary arrangements to ensure that their statutory aged children attend school regularly. For most parents/carers/guardians, this includes making arrangements for their child to travel to and from school.
- 2.6 The Council must make arrangements, free-of-charge, for eligible children to travel to school. Additionally, the Council has a discretionary power to arrange travel to school for other children. Brent Council is responsible for deciding what travel arrangements to make, provided they are suitable for the needs of the children for which they are made.
- 2.7 Where assistance is given, it should be seen as part of a plan of support that encourages and supports residents to become more independent and live a healthy lifestyle.
- 2.8 The Council is committed to the principle of inclusion and to promoting greater independence where possible for children and young people with special educational needs and disabilities so that their experiences can be similar to those of their peers.
- 2.9 The Council recognises that travelling to school as independently as possible is a valuable experience for young people as they grow up. In order to do this, many young people with special needs may need extra training to help them learn skills required for greater independence and to prepare for adulthood.
- 2.10 Normally eligibility for free travel will be determined at the time that a school place is allocated through:
- Brent Council's Coordinated Admissions Scheme for entry at the normal points of admission; and/or
 - the issuing of an Education, Health and Care Plan or Review; and/or,
 - the operation of the Fair Access Protocol; and/or,
 - the In-Year Coordinated Admissions Scheme.
- 2.11 The London boroughs of Brent and Harrow have joined together in forming this policy in order to produce a consistent approach to providing travel assistance for children and young people



attending school/college. The aim of this collaborative approach is to ensure that regardless of where a child lives, within these Local Authorities, the level of service received is consistent, the service experience is the same and the most efficient, effective, and suitable travel assistance is provided.

3. KEY PRINCIPLES

3.1 Brent Council believes that independent and active travel provides the best outcomes for residents' physical health, mental health, and wellbeing wherever it is possible. As such this travel policy is based on the principle that the Council will try and assist residents in achieving this wherever possible in the first instance. This may take the form of Independent Travel Training, Personal Budgets, Travel Guides, or a combination of options. Where independent travel is not achievable the Council will first aim to provide travel assistance through group travel – which provides opportunities for service users to socialise and learn important life skills. Only where group independent travel and group travel are not possible will individual travel be considered.

3.2 The following key principles apply across all age ranges covered in this policy:

- **Admission does not confer automatic entitlement to travel assistance:** Admissions and travel assistance are separate matters and acceptance at a particular school or other institution, or the naming of a school/institution in an Educational Health Care (EHC) plan, does not automatically entitle the child or young person to travel assistance.
- **Budgetary considerations:** Free travel to school is a valuable service for many families, but budget pressures mean the Council often has to make difficult decisions about how to make the best use of the limited resources available. The Council must comply with the duty to arrange free travel for eligible children but have some discretion in how this is applied.
- **Changes in circumstances:** Parents, carers or guardians (in the case of those aged under-18) of children in receipt of travel assistance and recipients of travel assistance themselves (in the case of those aged over-18, or any person acting on their behalf) must tell the Council immediately of any change in circumstances which may affect their entitlement to travel assistance.
- **Independent travel training:** Applicants for travel assistance will be assessed for Independent Travel Training (ITT) and recipients of travel assistance will be expected to undertake suitable ITT as part of their education to help them develop their independence. Independent travel training is tailored and practical help for people with special educational needs and/or disabilities to travel by public transport, on foot or by bike. It aims to help children and young people travel independently and without fear so they can get to school or college, work and for social and leisure activities. Independent travel training could increase a child or young person's independence and improve their self-esteem and confidence. Being less reliant on parents, carers, and guardians to take them to places can lead to more opportunities to take part in social and community activities.
- **Other means of travel:** When taking discretionary decisions about the provision of travel assistance, the Council will consider all other ways and means for the applicant to get to

the school or institution in question, for example, the provision of a travel guide to accompany a child, young person, or adult to their place of education.

- **Personal Travel Budgets:** Applicants for travel assistance will be assessed and offered a Personal Transport Budget (PTB) in the first instance. A Personal Travel Budget is a payment designed to help parents/carers/guardians get their children to school/college. It is available to children who have been assessed as eligible to receive Home to School travel assistance. The Council encourages the use of personal transport budgets wherever appropriate as this helps individuals and families to have the most control over their travel arrangements.
- **Reviews of travel assistance:** All grants of travel assistance will be reviewed at least once per year and in all cases where there is, or may be, a significant change in circumstances affecting eligibility for travel assistance (e.g., change in school/college or home address, change in personal or family circumstances, change in recipient's needs). Where the recipient of travel assistance has an EHC plan then this review will be undertaken at, or following, the annual review of the plan. Any changes to travel assistance following a review will be implemented from the beginning of the next academic term, or sooner by mutual agreement.
- **Travel concessions, bursaries, state benefits etc.:** The Council expects young people of sixth form age and young adults who apply for travel assistance to have applied for and/or made use of all travel concessions, bursaries, state benefits (including mobility cars) etc. for which they are eligible.
- No free transport is provided to address poor attendance or non-attendance unless this is attributable to permanent or temporary medical/disability/mobility issues that mean a child cannot walk to the nearest available school. This applies both to children who do not have an Education, Health, and Care Plan and those who have such a plan. Where a child has moved into Brent there may be a delay in establishing the travel arrangements, within this context parents/carers/guardians are responsible for ensuring their children attend school.

3.3 The London Borough of Brent Travel Assistance Policy for Children and Young People aged 0-25 in Education sets out to support eligible children and young people with special educational needs and disabilities (SEND) to attend educational settings, reduce the proportion of children and young people who are not in education, employment or training (NEET) and promote independence in order to better prepare young people to enter adulthood feeling confident and engaged in their futures.

3.4 The transport arrangements provided by the Council support families to ensure their children can attend school/college. This provision helps to ensure that families are best supported to achieve punctual school attendance, including:

- Families with multiple children, each with individual school arrangements.
- Families where parents/carers/guardians have commitments to work, education or training.
- Families where parents/carers/guardians are disabled or have complex needs.
- Families from low-income households.



- Families where parents/carers/guardians are young people themselves.

4. TYPES OF TRAVEL ASSISTANCE

4.1 The Education Act 1996 and this policy use the phrase 'travel assistance' because the form this takes will vary and often does not involve the Council providing any transport at all. The Council will determine what is appropriate in each case, taking account of its legal obligations, the needs of the applicant, safety considerations, the best use of the Council's resources, any expressed preference, and any other relevant matter. In order to achieve as much independence and as much active travel as possible, when reviewing travel assistance applications, the Council look at the potential options in the following order:

- **Travel pass** – This is a free pass in the form of an Oyster Card that is available for use on public transport such as buses and is the most common form of travel assistance provided. Brent Council considers that this will be suitable for the majority of children and young people up to the age of 16.
- **Personal Travel Budget (PTB)** – This is a sum of money provided to parents/carers/guardians of children who are assessed as eligible for travel assistance. This allows parents/carers/guardians to arrange personalised, flexible travel arrangements that suit the needs of their child and family.

The sum provided is based on the safe walking distance between home and school and the number of days per week the child or young person is scheduled to attend school or college.

Parents/carers/guardians can use a PTB in any way they deem necessary to ensure their child/young person attends school regularly and arrives and leaves on time. They will not need to provide any evidence for how the money is spent. PTBs will not affect any of the other benefits the family already receives.

If attendance falls, Brent Council will contact the parent/carer/guardian and review whether the PTB is still the best mode of travel assistance. As a result of the review, the travel assistance offered may change to a more suitable mode or PTBs reduced or withdrawn, depending on consultation with the school and family.

The parent/carer/guardian or adult individual then assumes full responsibility for the travel arrangements and getting the child or themselves to their place of education on time and achieving good attendance. It is anticipated that the use of personal travel budgets can meet most individual needs and the Council encourages their use wherever appropriate. The provision of travel budgets can be offered in a number of ways:

Mileage allowance banding	Distance from school	Annual PTB offer
Band 1	0 – 2.49 miles	£2100
Band 2	2.5 – 4.99 miles	£2625



Band 3	Between 5-9.99 miles	£3150
Band 4	Over 10 miles	£5250

- **Provision of a Travel Buddy** – A travel buddy may be provided to accompany a child or young person to their place of education whether using public transport or on Council provided transport. A travel buddy will only be provided where they are necessary for the safe operation of vehicles and/or the care of children and young people and where parents, carers or guardians are not reasonably able to accompany them.
- **Transport vehicles** – If the Council has considered and ruled out all other options, a suitable vehicle may be provided, specifically adapted as necessary, to transport the child or young person. Vehicles and drivers are provided by a suitably qualified, registered, commercial provider working to contractual standards set by the Council.

In general, vehicles are routed to pick up a number of children from different locations who attend a particular school. Therefore, journeys can be relatively long, and the child or young person will spend more time in the vehicle than with other forms of travel assistance.

Each route will be planned on the basis of the start and finish times of the place of education and the shortest possible route for all passengers on a particular vehicle. Passengers will be picked up and dropped off at a convenient location, within a reasonable distance from their home, in many cases from recognised bus stops. A home pick-up and drop-off will only be made where it is deemed essential due to the individual's significant needs.

If a child is accessing a collection point, parents/carers/guardians will be responsible for ensuring that the child gets safely to and from the collection point at the appropriate time. If the child's travel assistance offer requires them to walk to a collection point, then it is expected that an adult will accompany them where necessary. Parents/carers/guardians will also be responsible for the child when they are waiting for transport and when they leave the transport at the end of the day.

In the event of an emergency, late running of the service, or an adult not being present at a collection point, children will be taken to an agreed safe point for collection.

- **Other** – The Council may provide any other form of travel assistance which is considered suitable and will consider any suggestions from applicants about any particular type of travel assistance.

4.2 The delivery of travel assistance in Brent is supported by Transport for London (TfL). TfL has many accessibility schemes, including but not limited to:

- Travel Mentoring service, where travel mentors offer practice journeys and guidance for planning and making journeys.
- Travel Support Cards, which help people to communicate any assistance or information requirements they have to staff.

- Mobility Aid Recognition Scheme, which helps passengers to check if their mobility aid is suitable to travel on buses.
- Freedom Passes and concessionary travel.
- Planning a step-free route.
- Staff training on providing assistance to passengers, including guiding visually impaired customers by the arm and helping wheelchair users get on and off trains.
- Provision of accessible resources including maps and guides.
- Taxicard, which is a subsidised scheme for people using taxis and minicabs.
- Community Transport and Dial-a-Ride, which can provide door-to-door transport for people who cannot use mainstream public transport.
- National Passenger Assist service, which allows passengers to request an assistance booking in advance.

5. ELIGIBILITY CRITERIA FOR TRAVEL ASSISTANCE

This policy is divided up by the following age groups as the relevant legal provisions in the Education Act 1996 are grouped this way:

- ❖ **Part 1: Pre-compulsory school age (0–4-year-olds)** – someone in this category is referred to in this policy as a pre-schooler.
- ❖ **Part 2: Compulsory school age (5–16-year-olds)** – someone in this category is referred to in this policy as a child. Children become of compulsory school age at one of three points during the school year in which they turn 5, depending on when exactly their birthday is. Children cease to be of compulsory school age on the last Friday in June of the school year in which they turn 16.
- ❖ **Part 3: Young people of sixth form age (16–18-year-olds)** – someone in this category is referred to in this policy as a young person. The legal definition is a person over compulsory school age but under the age of 19, but this definition also includes a person who began a particular course of education or training at a school or college before turning 19 and continues to attend that course.
- ❖ **Part 4: Adult learners (19+)** – someone in this category is referred to in this policy as an adult.

5.1 Part 1: Pre-compulsory school age (0–4-year-olds)

- a. The Council's policy is not to provide travel assistance to pre-schoolers except where the pre-schooler has an EHC plan, and the circumstances are considered to be exceptional. Even where the Council does provide travel assistance to a pre-schooler it will make a charge for this, which will be calculated in the same way as the charge for the provision of travel to young people as set out in Part 3.
- b. The Council will consider whatever is said in any application but will have regard to the following:
 - Distance and journey time from the pre-schooler's home to their place of education and the cost of providing travel assistance.
 - What alternative means of facilitating attendance there may be
 - What alternative placements or options there may be



- The contents of any EHC plan (including anything about transport)
- The best use of the Council's resources and the competing claims upon them

5.2 Part 2: Compulsory school age (5–16-year-olds)

- a. The Education Act 1996 sets out the categories of children and young people of compulsory school age who are eligible for free travel assistance. The Council's policy is to provide travel assistance to these categories of eligible children in accordance with its legal obligations, but not otherwise unless there are exceptional circumstances.
- b. Where travel assistance is provided it will be whatever the Council considers is necessary and suitable for the purpose of facilitating the child's or young person's attendance at school for the normal school day. A list of the most usual types of travel assistance is set out at page 4 above.
- c. There are 4 categories of eligible children to whom the Council is obliged to provide travel assistance free of charge as set out below. Where they refer to a "qualifying school" this means a school (or nursery) maintained by the Council ("state schools"), an Academy, a pupil referral unit, a non-maintained special school, or a place where a child is receiving education arranged by the Council otherwise than at school. A "home address" is considered to be a residential property that is the child's only or main residence and is either:
 - Owned by the child's parent(s), or the person with parental responsibility for the child; or
 - Leased to or rented by the child's parent(s), or the person with parental responsibility under lease or written rental agreement of not less than twelve months duration; and
 - Where parents/carers/guardians have shared responsibility for a child, and the child lives with both parents/carers/guardians for part of the week then the main residence will be determined as the address where the child lives the majority of the week. Parents/carers/guardians may be requested to supply documentary evidence to satisfy the authority that the child lives at the address put forward by the parents/carers/guardians.
- d. The 4 categories of eligibility for children are as follows:

1. Category 1: Distance

Travel assistance will be provided for children who attend their nearest qualifying school and the distance between their home address and school is over the statutory walking distance. The statutory walking distances are:

- 2 miles for children under 8 years of age.
- 3 miles for children or young people aged 8 or over.

The council will monitor and notify parents/carers/guardians once their child reaches the above statutory walking distance. The statutory walking distance is measured along a route that a child might reasonably be expected to walk to school accompanied where necessary by



a parent, carer, or guardian. The responsibility for the journey rests with the parents, carers, or guardians. This is consistent in the way in which distance is measured by the School Admissions Team?

Where a parent, carer or guardian chooses a school for the child but there is a qualifying school nearer to home which they could attend then travel assistance is not available under this heading. In the case of children with an EHC plan there may be cases where a school that is not the nearest qualifying school is named on the basis that the parents/carers/guardians will be responsible for transporting them. Where this happens the EHC plan will be worded accordingly and make the position clear.

2. Category 2: Low-Income Families

“Low-income family” means one where the child or young person is entitled to free school meals or where one or both parents/carers/guardians are in receipt of the maximum level of working tax credit. Children or young people in such families who do not qualify for travel assistance in category 1 (distance) above are nonetheless entitled to travel assistance if they satisfy the following criteria:

- **Primary Aged Children:** Children aged between 5 and 11 years of age from low-income families are entitled to free travel assistance where they are attending their nearest qualifying school and that school is more than 2 miles from their home.
- **Secondary Aged Children and Young People:** Children and young people aged 11-16 (in year groups 7 to 11) from low-income families are entitled to free travel assistance if they are attending a school more than 2 miles but not more than 6 miles from the home address and it is one of the three nearest suitable qualifying schools from their home. This distance is extended from 6 to 15 miles if the parents, carers, or guardians have selected the nearest qualifying school based on their religion or belief and, having regard to the religion or belief in question, there is no suitable qualifying school nearer to home.

3. Category 3: Unsafe walking route

Travel assistance will be provided for all children and young people who cannot reasonably be expected to walk to the nearest suitable school because the nature of the route is deemed unsafe to walk.

The safety of a particular route will normally be assessed by an officer from the SEN Travel Team in conjunction with an officer from the Brent Transport Hub, however this applies to all Children and Young People.

When assessing whether a route can be walked in reasonable safety, Brent Council will consider the whole route. This will include, for example, any sections that use footpaths as well as sections that use roads. The Council will also consider a range of risks such as canals, rivers, ditches, speed of traffic and fields of vision for the pedestrian and motorist.

4. Category 4: Special Educational Needs or Disability

Children and young people who do not qualify for travel assistance under category 1 (distance), category 2 (low income) or category 3 (unsafe route) above are nonetheless



entitled to travel assistance if they are attending the nearest qualifying school to their home which is suitable for their needs but have special educational needs, a disability or mobility problem and for this reason cannot reasonably be expected to walk to that school, even if accompanied.

As noted above in relation to category 1, in the case of children with an EHC plan there may be cases where a school that is not the nearest qualifying school is named on the basis that the parents/carers/guardians will be responsible for transporting them. Where this happens the EHC plan will be worded accordingly and make the position clear.

A child will not normally be eligible for free travel to school on the grounds of their special educational needs, disability, or mobility problem, or on the grounds that the route is unsafe, if they would be able to walk to school if they were accompanied. Where the Council determines that a child would be able to walk if they were accompanied, the general expectation is that the parent/carer/guardian will accompany them or make other suitable arrangements for their journey to and from school. A child will not normally be eligible solely because of their parents'/carers'/guardians' work commitments or caring responsibilities mean they are unable to accompany their child themselves, but local authorities must act reasonably in the performance of their functions.

Where a child has an EHC plan, the Council is required to ensure that the annual review of the EHC plan from at least year 9 onwards includes a focus on preparing for adulthood, including independent living. For many children, learning to travel independently is an important part of preparing for adulthood and will help them lead fulfilling adult lives. When making travel arrangements for eligible children with special educational needs or disabilities, local authorities may take account of how best to support them to develop independence. For example, they might consider whether a child who would otherwise travel in a taxi, might be able to travel on a public service bus if provided with support to do so, or whether a child who uses a wheelchair might be able to wheel to school rather than travel in a minibus, if provided with support to do so.

Once an eligible child can travel independently, their travel arrangements may need to be reviewed. For example, they may now be able to walk or catch a bus to school rather than travel in a taxi. Local authorities must not withdraw free home to school travel from an eligible child who does not successfully complete the travel training programme.

Section 508B (4) (b) of the Education Act 1996 requires local authorities to obtain parental consent in order to meet their school travel duty in respect of an eligible child by providing someone to escort the child or paying their travelling expenses. This means, for example, that the parent's consent is required for a local authority to meet their school travel duty by providing independent travel training, or providing someone to accompany a child so they can wheel to school in their wheelchair. Where the parent/carer/guardian does not provide consent, the local authority must make alternative arrangements for the child's travel to school.

The transport needs of young people with special educational needs and disabilities will be reassessed when a child moves from compulsory schooling to post-16 education.



5.3 Part 3: Young People of sixth form age (16–18-year-olds)

This part of the policy includes the Council's Transport Policy Statement which the Education Act 1996 requires it to publish each year, setting out what travel assistance is available, from the Council and other bodies, to facilitate the attendance of young people of sixth form age receiving education or training at schools, FE colleges/institutions, 16-19 Academies, and certain other institutions maintained or funded by the Council.

The transport needs of young people with special educational needs and disabilities will be reassessed when a young person moves from compulsory education to post-16 education. There is no automatic continuation of any free home to school transport arrangements for young people aged 16 and above.

If a young person did not have travel assistance prior to leaving school, and are continuing in full-time education elsewhere, they can apply for travel assistance at this point.

The majority of young people are expected to transition towards being able to travel independently and it is presumed that the previous education or training establishment will have started to prepare young people with independent travel skills, and that parents, carers and guardians of young people will continue to practice independent travel throughout the summer holiday prior to starting any new study programme.

Brent Council expects the majority of young people to make their own travel arrangements to travel to and from their place of learning independently. However, the Council does acknowledge that independent travel for students with severe and complex learning disabilities may not be a possibility. In such cases, there may be a need for additional support with transportation.

Before Brent Council will consider any application for travel assistance, a young person must provide evidence that they have explored and exhausted all available sources of support as set out in the Post 16 Travel Policy Statement.

Exceptional Grounds

The list below is not exhaustive, and there will be other circumstances in which the Council may agree to provide free home to school travel assistance. Please note, however, that individual family work commitments, childcare arrangements and/or inconvenience to parents/carers/guardians is not normally taken into account when considering eligibility for travel assistance.

Where the council agrees to provide free home to school travel assistance this is not to be taken as a precedent for any other child or young person, including a sibling of that child or young person. Each application from the child or young person will be considered on a case-by-case basis.

In considering whether to provide travel assistance the Council will have regard to the following:

- The needs of those for whom it would not be reasonably practicable to attend a particular establishment to receive education or training if no arrangements were made;

- The needs of those who are vulnerable to becoming not in education, employment, or training (NEET) at the age of 16 or 17, or who have already become NEET.
- The needs of young people who are parents/carers/guardians.
- The need to ensure that people in the Brent area have reasonable opportunities to choose between different establishments at which education or training is provided;
- The Council's legal duties, including the duty to ensure that enough suitable education and training is provided to meet the reasonable needs of 16–18-year-olds.
- Distance and journey time from the student's home to establishments of education and training, the cost of transport there and alternative means of facilitating attendance at education establishments.
- The nature of the route or alternative routes which the young person could reasonably be expected to take.
- Any preference to attend a particular educational establishment based on religion or belief.
- The nature of the young person's special educational needs or disability.
- Anything said in an EHC plan about travel assistance.
- Whether there is a nearer institution which is suitable and can provide the same or similar qualification(s).
- The best use of the Council's resources.
- If parents/carers/guardians choose for a child or young person to attend a college or further education institution outside of Brent when an establishment in the borough offers the same or a comparable course, the Council may refuse the application on these grounds.

As set out in the key principles above, the Council will also expect applicants first to have applied for and made use of all other sources of assistance. Financial assistance may be available from (or by applying through) the school or further education institution in question and Appendix 2 sets out full details of these schemes. In addition, there are various concessionary travel schemes in Brent which may be available, and these are set out in Appendix 3.

If the Council agrees to provide travel assistance, consideration will be given to a full range of travel options which reflect the core principle of promoting independence. These options could include independent travel training support, personal travel budgets and the provision of a travel pass/Oyster card.

Brent Council reserves the right to apply charges to or request a contribution from parents/carers/guardians for travel assistance for young people over the age of 16.

Appendix 2 is a list of sources of travel support available to young people through schools and further education institutions. Enquiries and applications in respect of these should be made through the young person's school or institution.

Appendix 3 is a list of travel concessions which may be available to young people.

5.4 Part 4: Adult Learners (19+)

This part sets out the Council's transport policy statement as required by section 508G of the Education Act 1996 in respect of academic year 2023/24 for adults, which is to say people who



are not of compulsory school age or sixth form age. Section 508G of the Education Act 1996 requires the Council to specify in this document:

- a. any transport or other arrangements, and any payment of travelling expenses, made or to be made in relation to the academic year under section 508F in relation to adults (Post-19) with an EHC plan; and
- b. any travel concessions which are to be provided to adults (Post-19) with an EHC plan receiving education or training at certain institutions.

This policy statement also sets out the Council's arrangements under section 508F in relation to adults without an EHC plan.

The Council does not make any general arrangements for free transport or the payment of any travelling expenses under section 508F of the Education Act 1996 as it considers that these are unnecessary for the vast majority of adults. It will consider making arrangements for individuals if they have an EHC plan or their circumstances are exceptional.

Brent Council reserves the right to apply charges to or request contribution from parents/carers/guardians for travel assistance for young people over the age of 16.

Exceptional Grounds

The list below is not exhaustive, and there will be other circumstances in which the Council may agree to provide free home to school travel assistance. Please note, however, that individual family work commitments, childcare arrangements and/or inconvenience to parents/carers/guardians is not normally taken into account when considering eligibility for travel assistance.

Where the council agrees to provide free home to school travel assistance, this is not to be taken as a precedent for any other child or young person, including a sibling of that child or young person. Each application from the child or young person will be considered on a case-by-case basis.

The Council will consider whatever is said in any application but will have particular regard to the following:

- The age of the applicant.
- The nature of the route or alternative routes the applicant could reasonably be expected to take.
- Distance and journey time from the applicant's home to their place of education and the cost of providing travel assistance to there.
- What alternative means of facilitating attendance there may be.
- What alternative institutions or options there may be.
- The contents of any EHC plan (including anything about transport).
- Any relevant legal duties upon the Council.
- If parents/carers/guardians choose for a child or young person to attend a college or further education institution outside of Brent when an establishment in the borough offers the same or a comparable course, the Council may refuse the application on these grounds.
- The best use of the Council's resources and the competing claims upon them.

Appendix 4 is a list of travel concessions and other sources of support for adults aged 19+.

6. PARENTS/CARERS/GUARDIANS WHO ARE DISABLED

- 6.1 Requests for travel assistance will be considered if a parent/carer/guardian has difficulty using public transport, for example the parent/carer/guardian has a disability.

7. BEHAVIOUR AND CONDUCT

- 7.1 When transport is provided by the Council, the Council will undertake a risk assessment as necessary, to ensure the safety of all passengers and the driver.
- 7.2 It is also understood that the nature of some special needs may require additional support or adjustment. However, it is expected that children and young people will behave appropriately whilst travelling.
- 7.3 Any instances of unsafe, inappropriate, or threatening behaviour will be considered as serious, as this may impact on other people in the vehicle.
- 7.4 In such instances, Brent Council will work collaboratively with the school and the transport provider to find ways to manage the behaviour. If there is no improvement, the Council will explore alternative travel assistance options, and this will be discussed with the parent/carer/guardian.
- 7.5 In such instances, parents/carers/guardians will be notified in writing, and this may result in a temporary withdrawal of the transport. In such cases, the parent/carer/guardian may be required to make their own arrangements to get their child to and from school until a solution is agreed.
- 7.6 Any further incidents of unsafe, inappropriate, or threatening behaviour may result in the permanent withdrawal of transport, in which case it will then be the responsibility of the parent/carer/guardian to make and fund their own arrangements to get their child to and from school.

8. RESIDENTIAL PLACEMENTS

- 8.1 Parents, carers, and guardians are encouraged to take and collect their child to and from residential schools. This ensures that there is regular face-to-face communication with the school.
- 8.2 If the child is eligible for travel assistance, the Council will consider the appropriate travel options.

9. HOW TO APPLY FOR TRAVEL ASSISTANCE

- 9.1 A formal application must be made to the Council's Travel Assistance Service for all travel assistance included in this policy, and parents/carers/guardians should apply for Travel Assistance for the next academic year in the months of May, June, and July. All applications must be made on the prescribed form 'SEN Travel Assistance Application Form.' The forms are at Appendix 1 and are also available on the internet at <https://www.brent.gov.uk/children-young-people-and-families/send-local-offer/send-travel-transport-and-getting-around#schooltransport>
- 9.2 For pre-schoolers and children, a parent, carer, or guardian should make the application. For young people with an EHC plan attending a special needs school, a mainstream school or college, applications should also be submitted by a parent, carer, or guardian. For other young people and adults, the application should be made by the young person or adult, or by a person acting on their behalf.
- 9.3 Each application will be processed within 7 working days. Late applications could delay the award of transport which will require parents/carers/guardians to make their own arrangements while the application is being processed.
- 9.4 Consideration will be given to everything stated in the application form including all the evidence provided in support of the application. The Council will also consider all matters to which the Council is required by law to have regard, in order to determine whether to provide travel assistance and if so, what form that assistance should take.
- 9.5 If an application for travel assistance has been approved, the travel assistance options will be considered in the order outlined in section 4 of the policy. If the Council provides a travel assistance option that is appropriate to the needs of your child or young person and it is unreasonably refused without good reason, the application may not be progressed further and may be unsuccessful.
- 9.6 If the outcome is for transport, it will take up to 15 working days to be arranged. Please note that if transport is arranged, a risk assessment will be carried out and the Brent Transport Hub will determine the appropriate mode of transport which in most circumstances will be a shared bus.
- 9.7 Travel assistance may be arranged on a localised pickup point basis, if assessed as appropriate through the application process.

10. APPEALS AND COMPLAINTS

- 10.1 If an application for travel assistance is not approved by the Council, or the individual disagrees with the type of travel assistance offered, there is a right of appeal as set out below. During the appeal stages, travel assistance will not normally be provided and/or changes to existing travel assistance will not normally be made.

10.2 Appeals should be made within 20 working days of the decision being received by the parents, carers, or guardians and on the appropriate form which can be obtained by contacting the SEN Travel Team as follows:

Email: sen.transport@brent.gov.uk

Website: <https://www.brent.gov.uk/children-young-people-and-families/send-local-offer/send-travel-transport-and-getting-around#schooltransport>

10.3 The appeal will need to set out the exact nature and grounds of the appeal. The appeal process has two stages:

10.4 **Stage 1** – A senior Council officer will consider the appeal within 5 working days of the receipt of the appeal form and the applicant will receive confirmation that the appeal is under review. Further evidence may be requested to support the appeal and consultation with caseworkers and professional bodies may be required. A decision and notification will be made within 20 working days from receipt of the appeals form. If the applicant remains dissatisfied with the outcome, they should notify the Council in writing within 15 working days of receiving the appeal decision and the appeal will then be moved to stage 2.

10.5 **Stage 2** – Stage 2 is a review by a panel made up of senior managers and will be chaired by a manager independent of the original decision-making process. The panel will consider written and verbal representations from (or on behalf) of the applicant as well as information provided by the Council officer involved in the case and provide the applicant with written notification of its decision within 5 working days.

10.6 If the applicant remains dissatisfied, the applicant can raise a complaint to the Council using its complaints procedure.

Further details as to Council complaints process:

If, having been through the Council's complaints process the parents/carers/guardians or young person are still unhappy then they can complain to the Local Government Ombudsman. The ombudsman can be contacted at: <https://www.lgo.org.uk/>.

Further avenues for appeal: Judicial review

Parents/carers/guardians and young people have the right to seek a judicial review of a decision made by the appeal panel. A judicial review would ask the courts to consider whether the panel has acted lawfully in taking its decision (e.g., has it followed the correct process and/or considered all of the evidence properly) rather than whether the decision of the panel is the correct one. If a judicial review is upheld, then the independent appeals panel could be asked to consider the case again. If parents/carers/guardians and young people are considering judicial review, then the Council advises that they should seek independent legal advice immediately.

Other complaints

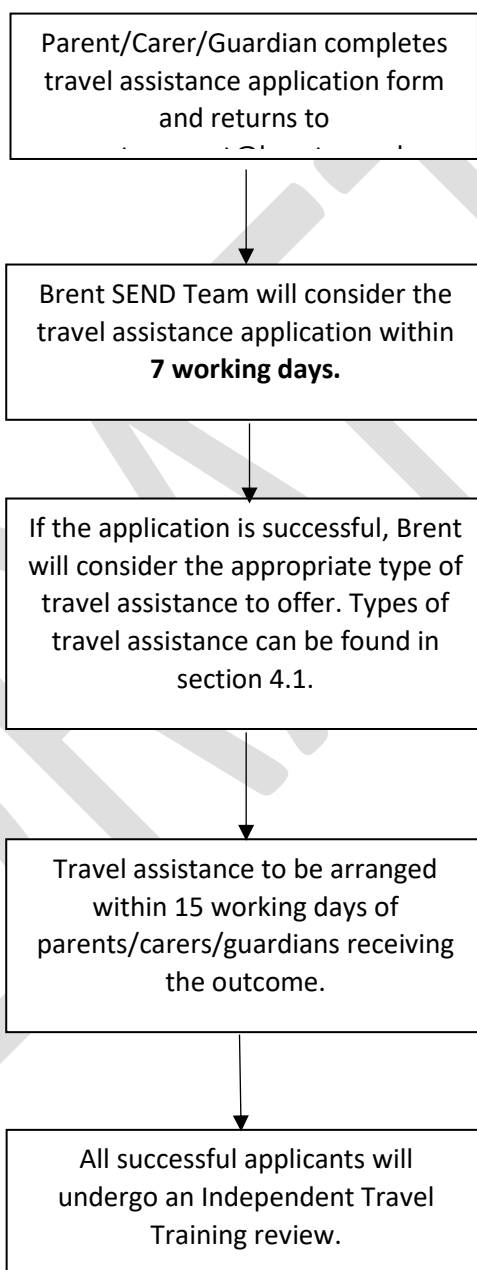
Queries or complaints relating to journey planning; the standard/condition of vehicles; drivers; passenger assistants and any other issues relating to the journey to and from school



should initially be brought to the attention of the Transport hub via email transporthub@harrow.gov.uk. Alternatively, you can contact the Transport Hub via phone on 0208 424 1443.

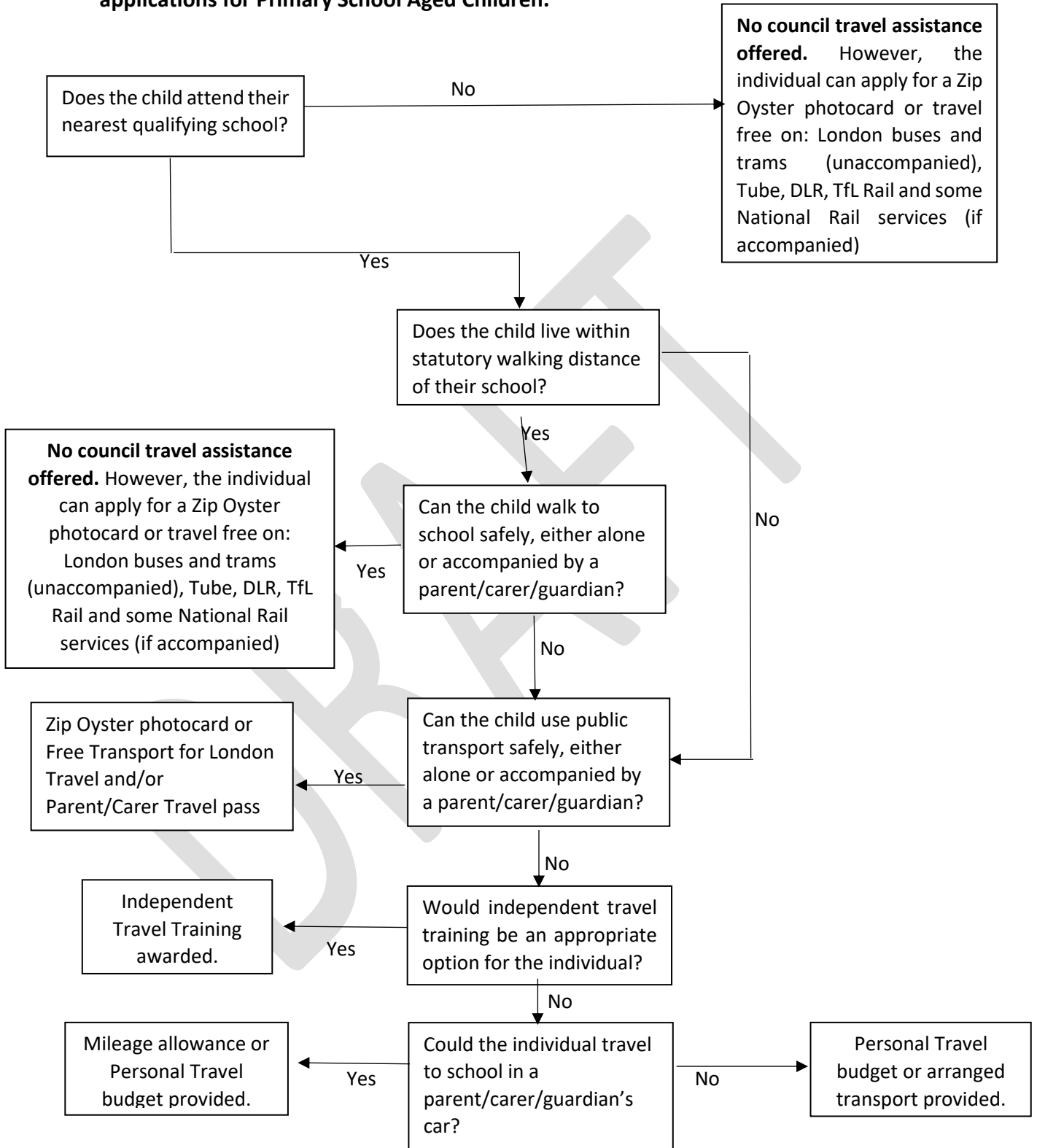
11. APPLICATION, DECISION MAKING AND REVIEW/APPEAL DIAGRAMS

11.1 Application process

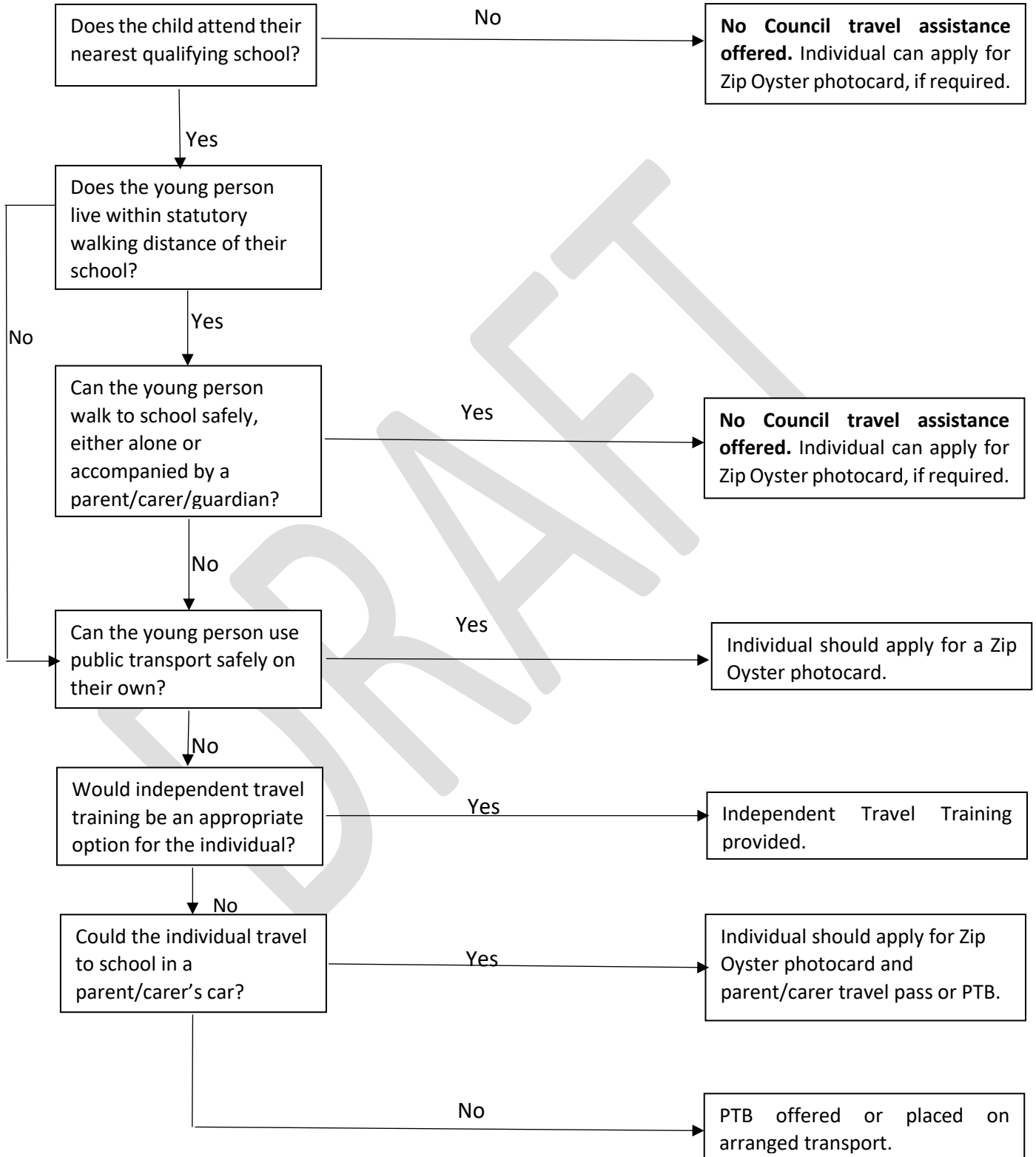




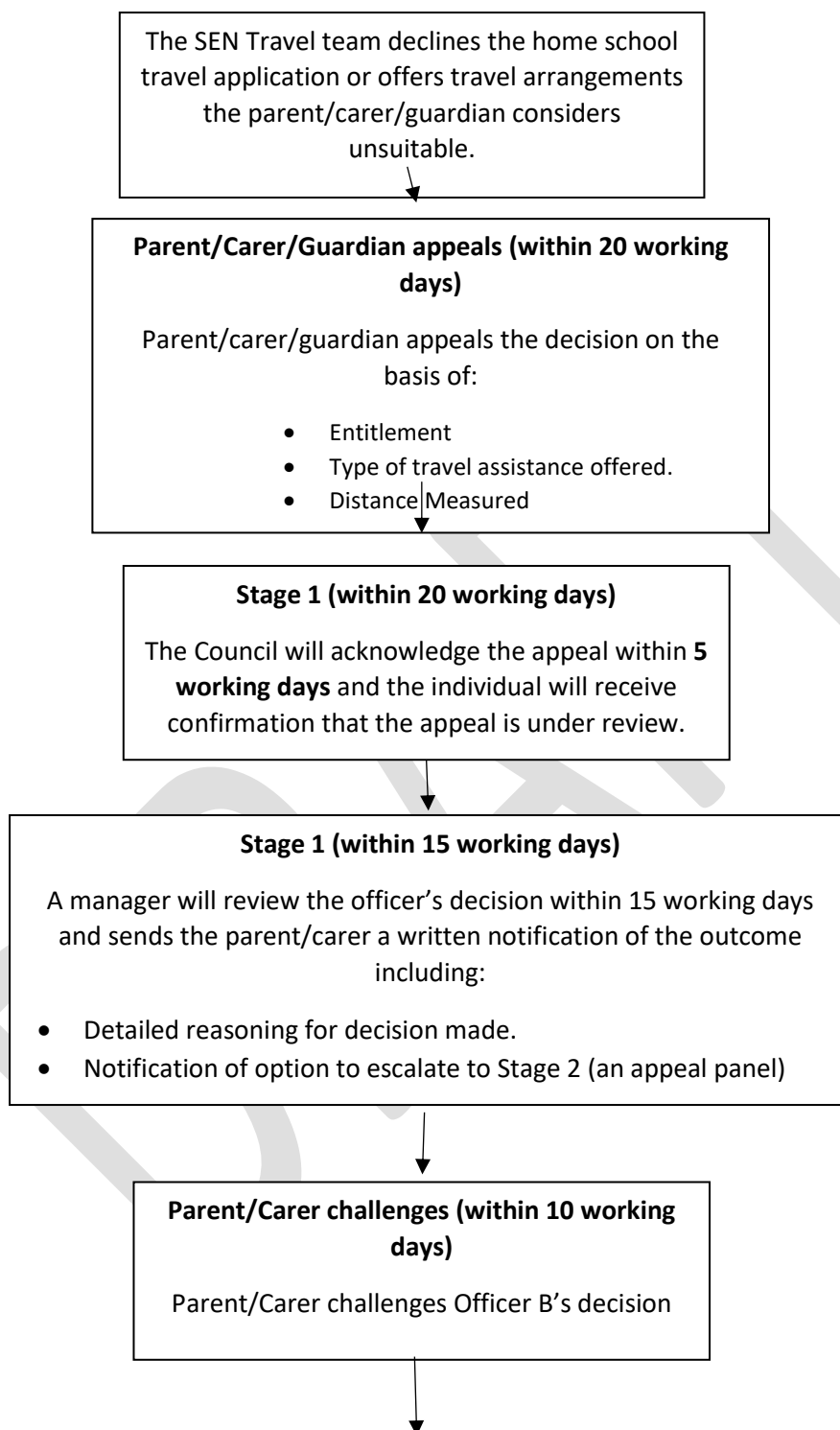
11.2 a.) The diagram below demonstrates the decision matrix for SEN Travel Assistance applications for Primary School Aged Children.



b. Decision matrix for SEN Travel assistance applications for Secondary School children



The diagram below outlines the review/appeal process.



Stage 2 will be held at the monthly panel):

Independent Appeal Panel (Officer A or B will sit on the panel but will not be part of the final decision) hears written representation from Parent/Carer/Guardian and Officer A or B. The panel will send a decision letter to Parent/Carer/Guardian **(within 5 working days)** including how to escalate to internal complaints process.

Appendix 1: Parent/Carer/Guardian Responsibilities

The efficient operation of the travel assistance policy required the Council and parent/carers/guardians to work in partnership.

It is the responsibility of all parents/carers/guardians to ensure that their children attend school, including those children with SEND.

Brent Council has a duty to provide travel assistance for children who meet the eligibility criteria to facilitate their attendance to school.

Parents/carers/guardians play a key role in ensuring the smooth running of a child's travel assistance, and are required to:

- Make a timely application for travel assistance with accurate information on the needs of the child.
- Provide home and work telephone numbers and an emergency contact number and address.
- Notify the Transport Manager of any changes to normal arrangements with as much notice as possible (e.g., in case of illness)
- Ensure that the child or young person is ready at least 10 minutes before pickup time (in order to ensure that other children are not disadvantaged, the vehicle cannot wait for longer than 5 minutes after the scheduled pick-up time)
- Ensure that they are available to receive your child after school at the designated collection point.
- Advise the driver/escort of any particular challenge or difficulties that their child is experiencing on a specific day.
- Help a child or young person make the transition from one form of travel assistance to another.

If a child is late on a regular basis for either the pick-up or drop-off, parents/carers/guardians will be contacted by an appropriate person from the Council in an attempt to work together to resolve the situation. If the lateness continues, the Council will decide on an appropriate course of action.

12. APPENDICES

Appendix 1: Parent/Carer/Guardian Responsibilities

Appendix 2: Application forms for travel assistance

Appendix 3: Travel support available from schools and further education institutions for young people of sixth form age

Appendix 4: Travel concessions which may be available for young people of sixth form age

Appendix 5: Travel Concessions and Other Sources of Support for adults aged 19+

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Appendix 2 – Travel Assistance Consultation – Consultation Coding

Feedback on the current service: what is working well?

Session ID	Quote/Reference	Theme 1	Theme 2
1	Policy is easy to find online	Comms	
1	Have not had a bad experience with transport so far	General positive experience	
1	One parent found that when they wrote to Brent Council for their first time application, the service was very supportive and helpful in explaining the different options available	Good management	
1	Very happy with the provision, and feel that the staff know each child and their needs as individuals	General positive experience	Staff rapport
1	One parent shared their experience of good management and their requests as a parent being taken into account. They really trusted the escorts in their travel assistance arrangement.	Good management	Staff rapport
2	Young children are able to take transport to school, enabling one parent to support their other children as they go to different schools	Supports household	
2	The provision is well-organised, and management keep them up to date on any delays and incidents	Good management	General positive experience
2	One parent finds that the person that coordinates their transport is particularly great at communicating with the family	Good management	Communication
3	The letter received at the beginning of service in August, providing an ID number, is very helpful in making adjustments to transport arrangements	Good management	Communication
3	One parent has nothing negative to say	General positive experience	
3	Transport helps a parent who is at college/in placement to manage their life priorities.	Supports household	
3	One parent has been working with Brent for 22 years, and overall is very pleased with the experience.	General positive experience	
Please note – no responses on this topic were received for Session ID 4.			

5	One parent says that they have a great escort and driver who communicate well about lateness & earliness, and engage well with the children and young people	Staff rapport	Communication
5	Text updates are well-received	Communication	
6	Good service, no complaints	General positive experience	
6	The buses do not seem overcrowded, which is good.	Journey	
6	Schools arrange pick-ups well by moving all transport children to one classroom at the end of the day to facilitate easy transfer onto buses.	Good management	
Please note – no responses on this topic were received for Session ID 7.			
8	Allocation of officers to routes is very helpful	Good management	
Email	My daughter is able to go to an out of borough school which primarily caters to her needs. Transport has given us the ability to not be restricted that she can progress in a school and environment tailored for her. Hence we are grateful and hope this is not stripped away. Everyone deserves a good Education regardless of background and disabilities.	General positive experience	

Feedback on the current service: what is not working well?

Session ID	Quote/Reference	Theme 1	Theme 2
1	Many changes from the previous PCF have not been actioned	Changes not actioned	
1	Changes have been made to the service without parent/carer consultation	Communication	
1	Timings for pick-ups and drop-offs are not being considered in relation to the family/carers' schedules and needs	Communication	Pick-ups/drop-offs
1	Journey times are too long	Journey times	
2	Pick-ups and drop-offs take a long time, meaning children have very long days and spend a lot of time on the transport	Pick-ups/drop-offs	Journey times

2	Sometimes pick-up times are changes without advance notice, affecting the family's morning logistics	Communication	Pick-ups/drop-offs
3	Parents are not informed of changes to drivers/escorts, especially around Eid and Ramadan	Communication	Staff rapport
3	Part of the application process involves detailing needs, however these are not taken into consideration	CYP's needs	
3	Escorts often do not speak conversational English	CYP's needs	Staff rapport
3	Phonelines are supposed to operate from 6.30am, but usually only operate from 7am	Communication	
3	Driver reportedly swore at another driver on the road, upsetting a young person on the transport. When this was reported it was not taken seriously. As such, the complaints process is flawed.	Complaints process	Staff rapport
3	Reports of staff ignoring/bullying parents/carers with EAL	Staff training	Staff rapport
3	One parent as part of the broader provision of services has lost trust with Brent and given up	General negative experience	
Please note – no responses on this topic were received for Session ID 4.			
5	Long journey times and too many children on the bus routes	Journey times	Overcrowding
5	Children arrive at school not ready to learn due to tiredness & overstimulation from their journey	Journey times	
5	Communication poor - recently had a problem where lateness was not communicated to parents, which does not set up their children well for the day.	Communication	Journey times
5	One parent has been using transport for years and it has been very inconsistent.	General negative experience	
5	Uncertainty around the adequacy of training offered to escorts and drivers.	Staff training	

6	The bus contract was changed at the start of March, and the parents were not informed of the change. There were new staff and a new bus, disrupting the young person's routine.	Communication	Staff rapport
6	One child's journey was changed without prior notice, changing the journey time from 10 mins to 2 hours.	Communication	Journey times
6	Multiple buses at pick-up points are confusing for children and parents.	Pick-ups/drop-offs	
6	Some pick-up and drop-off points seem inefficient, with children living on the same street and attending the same school but being placed on different buses.	Pick-ups/drop-offs	
6	Journey times are too long, and delays are not communicated to parents.	Journey times	Communication
6	One parent's child did not get home until after 6.30pm, the delay was not communicated and the office phonenumber had closed. This caused a lot of panic and distress as the parent did not know what was happening.	Journey times	Communication
6	Concerns around lack of staff on buses where young people could easily overpower a person if distressed.	Staff training	
Please note – no responses on this topic were received for Session ID 7.			
8	Implementing changes in September creates undue anxieties for children and families	Communication	
8	Changes are not communicated in the first place	Communication	
8	Formal complaints are not taken on board - one parent wanted their child to move to a single occupancy unit because of severe bullying, but has not heard anything	Communication	

	for 6 months on the independent review		
8	Journey times are too long. Allocations should be reviewed for efficiency.	Journey times	Pick-ups/drop-offs
8	When route officers are not available, it feels like no one does anything or knows anything, and issues are hard to resolve	Communication	
Email	It would be great if we have the drivers number or escort. Just incase there's an emergency and we can find out as soon as possible.	Communication	

Feedback on the current service: what could be improved?

Session ID	Quote/Reference	Theme 1	Theme 2
1	There should be fewer children on each bus to reduce journey times	Overcrowding	
1	Buses are not getting to school on time, which has a knock-on effect on education	Journey times	
1	Documents could be made more accessible with short-read and easy-read versions	Information accessibility	
1	Protocols for staff on transport are unclear, leading to lack of confidence from parents/carers	Staff training	
1	Children lack opportunities for fun & social activities	Extra-curricular opportunities	
1	Documents could be made accessible to the young people themselves	Information accessibility	
1	Travel assistance provision not very flexible - would like more opportunity for combinations of support	Arrangement flexibility	
1	SEND children are not getting access to after-school clubs due to rigid transport arrangements	Extra-curricular opportunities	

1	Would like a phonenumber to be able to ask about the progress of transport and any delays etc.	Communication	
1	Would like a post-consultation review session	Communication	
1	Continuity is important, outsourcing is not favoured, and changes need to be well communicated in advance	Communication	
1	All children's needs should be taken into account when allocating places on shared transport, including sensory needs	CYP's needs	
1	Promotion of the provision needs to be improved - one parent did not know their child could be eligible for travel assistance as they attend a mainstream school	Information accessibility	
2	Would like a short-read guide to the new central government guidance on travel assistance	Information accessibility	
2	Could the transport service be exempt from certain road rules, or be able to enter protected lanes to make pick-up and drop-off easier?	Journey times	
2	Would like clear feedback on the consultation themes, and explanation as to why certain suggestions have not been taken into account	Communication	
3	Would like provision confirmation letters to arrive earlier, e.g., July	Communication	
3	Would like eligibility for CYP at mainstream schools to be highlighted	Information accessibility	
3	Would appreciate being told that staff are taking time off etc. - this cannot always be communicated by the children themselves	Communication	
3	The threshold for transport at high school is different and unclear	Information accessibility	

3	Would like more email contact rather than through the PCF or post.	Communication	
3	Yearly application process would be better positioned earlier in the year, especially as families are informed of decisions late in the summer.	Communication	
3	More people attending consultation sessions	Communication	
3	EAL is a barrier - more translation services are needed as people feel unable to engage	Communication	
3	Would like engagement with the Somalian PCF	Communication	
3	Would like an overview of the training provided to transport staff incl. drivers & escorts	Staff training	
3	Would like a one-page profile (passport) of each child to be provided to staff	Communication	CYP's needs
3	Would like clarity around which documents need to be provided to prove eligibility for the service	Information accessibility	
Please note – no responses on this topic were received for Session IDs 4 & 5.			
6	Driver & escort continuity is key, and rapport is important as they greet the children. Changes to staff or routes can be disruptive for young people, and these should be communicated in advance.	Communication	Staff rapport
6	Number of people on buses and noise/sensory input are big parts of the transport experience; this should be taken into account.	CYP's needs	
6	The training of escorts & other staff needs to be reviewed. Staff should get comprehensive training and refreshers, and parents would like to know about the training staff have undertaken.	Staff training	Information accessibility
Please note – no responses on this topic were received for Session ID 7.			

8	Need more resources for parents with EAL, or parents who come from countries where the systems are very different. The system needs to be more user-friendly.	Information accessibility	
8	Documentation for the policy should be translated into other languages.	Information accessibility	
8	Overall, the parent supports the policy, and feels the need to drive change.	CYP's needs	
8	Parents need more information about the allocation of transport in advance of September.	Communication	

Feedback on different types of travel assistance

Session ID	Quote/Reference	Theme 1	Theme 2	Theme 3
1	One barrier to a PTB is that mileage allowance does not include petrol cost when sitting in traffic, and the time spent travelling	Petrol cost	Travel time	
1	Parents should be reimbursed for their time if they can do pick-up	Travel time		
1	What are the options for a mixed travel assistance offer?	Flexible arrangements		
1	The policy is unclear as to how EHCPs affect the provision offer in terms of support	Clarity		
1	Suggestion of a brainstorming session with different examples of needs and how these might apply to different forms of travel assistance	Flexible arrangements		
Please note – no responses on this topic were received for Session ID 2.				
3	One parent says that Camden & Harrow give more money for mileage, whereas the Brent mileage offer is not adequate to cover costs.	Petrol cost	Travel time	
3	The Brent mileage offer does not account for time to get onto transport, time spent in traffic etc.	Petrol cost	Travel time	

3	Information should be added about the Freedom Pass and TfL's accessibility offer.	Information accessibility		
3	There should be better training for staff eg in leisure centres around access cards and other accessibility support needs	Staff training		
Please note – no responses on this topic were received for Session ID 4.				
5	Concern around move towards pick-up points as one parent feels this has not been a successful move for other councils	Pick-up/drop-off points		
5	PTB offers flexibility around a child's needs, and is more than the current mileage allowance.	Flexible arrangements		
5	The current policy is not very flexible, and the mileage allowance is not adequate in the context of the Cost of Living Crisis.	Flexible arrangements	Petrol cost	Travel time
5	Mileage allowance does not account for time taken as well as petrol.	Petrol cost	Travel time	
5	PTB is not always accessible if you need to take multiple children to different schools.	Flexible arrangements		
Please note – no responses on this topic were received for Session IDs 6 & 7.				
8	One parent feels that PTBs being determined by EHCPs is not a good system, as the allocation of funding is there to support the learning and emotional regulation and other needs of the child. Any additional need meaning they require transport should therefore not come out of this budget.	Flexible arrangements		

Feedback on Independent Travel Training

Session ID	Quote/Reference	Theme 1	Theme 2
1	One parent would like reassurance that ITT will take into account individual needs, based not just on the school's profile of a young person	CYP's needs	
1	One parent feels nervous about the statements made around independence	Concerns around independence	

1	There is appetite for ITT	Positive sentiment	
1	Feel that travel trainers explaining the programme to parents/carers would help alleviate concerns	Concerns around independence	
1	Concerns about CYP being pushed to do travel training	Concerns around enforcement of provision	
1	Feel that ITT should be for those aged 16+, including university students	Age group	
2	Feel that ITT should be for those aged 14+	Age group	
2	Would like clarification on the provision of ITT to CYP attending schools outside of the borough	Clarity	Schools out-of-borough
2	Interest in a specialist team in-house	Positive sentiment	
2	Would like consideration of support being provided to parents/carers in order to support their own children in independent travel	Parental involvement	
2	Would like clarification on how access to ITT would function	Clarity	Access
2	Would like ITT to be available not only to CYP with EHCPs	Access	
2	ITT sounds like a good idea	Positive sentiment	
3	What about young people who have reached 18 and ITT has not been successful?	Concerns around independence	
3	Eligibility based on mainstream or specialist school attendance needs to be clarified	Clarity	Access
3	Wording should be changed to highlight collaborative aspect with parents/carers & young people	Wording	Parental involvement
3	ITT could involve a more social, informal aspect in order to foster a space for 16-25 year olds to socialise and learn skills	Community aspect	
3	One parent does not like the term 'disabled people,' and prefers person-first language	Wording	
3	A lot of appetite for ITT, and parents want to see better	Positive sentiment	Community aspect

	access to the community for CYP with SEND		
3	Need consistency in the trainers	Staff rapport	CYP's needs
3	Need a destination in mind	CYP's needs	
3	Would like the Council to consider the provision already available in schools	School management	
3	Would like the Council to consider the provision of buses by TfL for schools such as the 632.	TfL	
3	Would be keen to see parental involvement in the programme to support learning after the course has finished	Parental involvement	
Please note – no responses on this topic were received for Session ID 4.			
5	Would like a focus on stranger danger, how to deal with unexpected situations.	Risk and danger	
5	Feel that ITT should be for those in Year 9 and above, depending on individual need	Age group	
5	Distance should also be factored into ITT	CYP's needs	
5	Concerns that if a parent refuses ITT, provision will be withdrawn.	Concerns around enforcement of provision	
5	Does ITT mean going into the community, travelling from A to B, buddying, or modelling travel?	Clarity	
5	Travel on a train is very different to cycling, walking, and crossing roads etc.	Clarity	
5	Would like to see training on topping up travel cards and how to use the gates at stations etc.	TfL	
5	Concern that ITT will not be offered long-term and will instead be pushed back onto schools	School management	
6	One parent feels very open to the training and would love for their son to be more independent, but they cannot see it happening at the moment.	Positive sentiment	Concerns around independence

6	Many children are not aware of danger, struggle with social interaction (especially with autism)	Risk and danger	
6	Would like to see a smaller pilot group to start with	Focus group	
6	Would like to see pictures-based and visual training resources as these are helpful for CYP with SEND	CYP's needs	Visual learning
6	Children will need to build rapport with trainers over a longer period of time as they might not be immediately comfortable with new people	CYP's needs	Staff rapport
6	Children will need consistent reinforcement of what they have learnt	CYP's needs	
6	Repeating the same route several times would be a good idea	CYP's needs	
6	Some children feel very excited by public transport, so this is a positive idea	Positive sentiment	
6	Concern that this will affect the provision of other aspects of travel assistance	Concerns around enforcement of provision	
Please note – no responses on this topic were received for Session IDs 7 & 8.			

Feedback on proposed updates to the application process

Session ID	Quote/Reference	Theme 1
1	Children with EHCPs should have a choice over which school they attend	School choice
1	Concern that decisions will not take into account circumstances beyond distance	Family circumstances
2	Multiple children needing transport, or attending different schools, should be mentioned in the policy	Family circumstances
3	Unclear who decides and how it is decided to provide transport	Information accessibility
3	Any parts of the policy referring to 'discretion' should be clearer	Information accessibility
3	Feel that the panel has a good breadth of members, which should be noted in the policy	Information accessibility

3	It should be clarified what documentation is needed for the decision-making process around provision	Information accessibility
Please note – no responses on this topic were received for Session ID 4.		
5	It should be clearer to whom the new policy applies	Information accessibility
Please note – no responses on this topic were received for Session IDs 6 & 7.		
8	Information required on what should happen if you do not hear back after the 7-10 working days period.	Information accessibility

Feedback on proposed updates to the appeal process

Session ID	Quote/Reference	Theme 1
1	Panel a welcome change	Clarity
1	Clear process	Clarity
2	Do not like the phrase 'parent/carer challenges,' prefer 'appeals.'	Wording
Please note – no responses on this topic were received for Session IDs 3, 4 & 5.		
6	Clearer and shorter timeframes are helpful.	Clarity
Please note – no responses on this topic were received for Session ID 7.		
8	The review/appeal process timeframes are too long, and it is not good enough.	Timeframe

Feedback on proposed updates to the context section of the policy

Session ID	Quote/Reference	Theme 1
Please note – no responses on this topic were received for Session ID 1.		
2	Would like a line in the policy explaining that some CYP will not be able to travel independently, but may be able to develop independence and other skills in other areas, making sure that no one feels excluded from the offer.	Additional wording
3	The term 'skills' is unclear	Additional wording
Please note – no responses on this topic were received for Session ID 4.		
5	Would like to add 'for greater independence and preparing for adulthood '	Additional wording
6	Should be clearer that independence might not be possible for many children	Additional wording

6	The wording of the last statement should be reviewed - parent feels it assumes that every child with special needs just needs some extra training for independence. The individual aspect should be emphasised.	Additional wording
Please note – no responses on this topic were received for Session ID 7.		
8	One parent totally agrees with the context section.	General positive sentiment
8	Parent is concerned about the vulnerability of CYP with SEND on public transport, as people are often passive bystanders or perpetrators of harassment or bullying. This is often the case for other children rather than adults.	Concerns around independence

Feedback on proposed updates to parts 2 & 3 of the policy

Session ID	Quote/Reference	Theme 1
1	Part 3 does not take into account the full reasoning why a child may want to attend a school/college outside of the borough, and how it meets their needs	CYP's educational needs
1	Part 3 needs a robust and clear decision-making process	Information accessibility
1	The policy is unclear on eligibility and provision for young people aged 16-25	Information accessibility
1	The policy is unclear on provision of transport outside of education	Information accessibility
Please note – no responses on this topic were received for Session ID 2.		
3	Part 3 is harsh as Brent does not have adequate provision for CYP with SEND in-borough, and special schools are often offering functional skills rather than qualifications like GCSEs and A-Levels that some CYP might be able to achieve	CYP's educational needs
3	Part 3 'same or similar' needs to be clarified	Wording
3	Part 3 wording is overly negative and does not involve working with parents/carers. It feels frightening.	Wording
3	Part 3 does not take into account the support provided by schools/colleges beyond the fundamentals of a course.	CYP's educational needs
3	Concerns around Part 3 being interpreted as 'transport makes the decision of where my child goes to school.'	Wording
Please note – no responses on this topic were received for Session ID 4.		
5	Part 2 would like to add the word 'statutory' to the title, and specify ages of school age	Wording
Please note – no responses on this topic were received for Session IDs 6 & 7.		

8	One parent thinks this section should be entirely removed, as supporting school attendance should be the first priority.	CYP's educational needs
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Feedback on proposed updates to the behaviour and conduct section of the policy

Session ID	Quote/Reference	Theme 1	Theme 2
1	Wording is too hostile	Wording	
2	Policy should be clear on procedures for children being harassed/bullied/abused by staff or other children on the transport	Clarity	Bullying
3	Some CYP do not choose their behaviour/conduct.	Wording	
3	Put the reference to CYP with EHCPs at the beginning of the paragraph.	Wording	
Please note – no responses on this topic were received for Session ID 4.			
5	Dislike the term 'threatening behaviour.'	Wording	
6	Concerns around CYP with complex needs who might not yet have an EHCP	Clarity	
Please note – no responses on this topic were received for Session IDs 7 & 8.			

Feedback on proposed addition of section on disabled parents/carers/guardians

Session ID	Quote/Reference	Theme 1
1	Glad to see parental needs taken into account	Family circumstances
Please note – no responses on this topic were received for Session IDs 2 through 8.		

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Appendix 2.1 – Travel Assistance Consultation – Survey Coding

1. Do you agree that the new travel assistance policy is clear and easy to understand?

Yes	7
Somewhat	15
No	3

2. Do you agree that the appropriate language has been used throughout the policy?

Yes	19
Somewhat	3
No	1
I don't know	2

3. If no, which section does not include the appropriate language and what change/s would you make?

- Respondents wanted the criteria for eligibility and re-applying to be made clearer.
- One respondent requested that all references to 'disabled people' be replaced with the terminology of 'SEND'.
- Another respondent requested a simplified version of the policy be made to make it more dyslexia accessible.

4. Do you agree with Brent's approach to encourage independence and to promote a healthy active lifestyle for all service users?

Yes	8
Somewhat	9
No	7
I don't know	1

5. If no, please provide more detail.

- Respondents wanted it to be made clearer that not 'all' service users will be able to develop independence. Concerns were also expressed around the capacity for some children and young people with SEND to be aware of risks and danger.
- Respondents wanted more information about the Independent Travel Training programme, especially around eligibility for the programme and how travel assistance will be provided during and after completion of the programme.
- A few respondents expressed worry that this approach would affect the provision of motorised transport for their children/young people.

6. Do you agree with the travel assistance options available (Section 4 of the policy)?

Yes	8
Somewhat	14

No	2
I don't know	1

7. If no, what reservations do you have about the travel assistance options and why?

- Respondents wanted clarity around the eligibility criteria for each of the travel assistance options.
- Respondents raised concerns around the capacity for wheelchair-users to make use of public transport through the Independent Travel Training programme or accompaniment by a Travel Buddy.
- One respondent raised concerns around the potential move from door-to-door pick-ups to pick-up points due to weather and safety risks.

8. What are your thoughts on the proposed Personal Travel Budget bandings?

Banding	Distance from school	Annual PTB Offer
Band 1	0 – 2.49 miles	£2100
Band 2	2.5 – 4.99 miles	£2625
Band 3	Between 5 – 9.99 miles	£3150
Band 4	Over 10 miles	£5250

- The majority of respondents described the bandings for PTBs as 'fine' and 'reasonable.'
- The main area highlighted for review was for the budgets to increase in line with inflation on an annual basis.
- One respondent expressed dissatisfaction that the banding would not cover the costs for a wheelchair-accessible Uber to send their child to school.
- Another respondent expressed dissatisfaction that the banding would not cover the costs to employ someone to take their child to school as they are a working parent.

9. Are you aware of the provision of Independent Travel Training?

Yes	6
Somewhat	7
No	11
I don't know	1

10. Do you agree with the Council's approach to promote independence through the development of an Independent Travel Training programme?

Yes	6
Somewhat	14
No	5
I don't know	0

11. Please explain your answer in more detail.

- Respondents were keen to know more about the eligibility criteria for Independent Travel Training for their children/young people and wanted confirmation that any staff employed for the purposes of travel training would be adequately trained in engaging with children and young people with SEND.
- Respondents again wanted it to be made clearer that Independent Travel Training would not be a suitable programme for all children and young people.
- Many respondents were enthusiastic about the programme, especially around familiarising their children and young people with different modes of transport.
- Some respondents saw travel training as a key step in preparing their children/young people for adulthood. One respondent wrote, 'I would like my child to have independent travel training to prepare her for adulthood ... therefore I agree with this approach to prioritise training/support over taxis to and from school.'
- Other respondents understandably expressed fears around the safety of their children/young people.
- One respondent highlighted the need to take into account that a young person's needs may change during their life, which might also impact their ability to be travel trained.

12. Please provide any additional comments you wish to make on the new policy.

- Some respondents wanted clarity around how and when the new policy will be implemented.
- One respondent would like 1-1 travel buddies as a travel assistance option.
- One respondent would like drivers and escorts on motorised transport to have more comprehensive training around SEND.
- One respondent wrote, 'The HB transport is a God sent to us as I do not drive, and my daughter loves it.'


13. Are there any specific concerns or reservations you have about the proposed policy changes that you would like to express?

- Some respondents reflected that working parents/carers/guardians might find the new policy challenging if their child/young person's school is not local to them.
- Some respondents sought reassurance that Independent Travel Training would not be forced upon their children/young people.
- One respondent wrote, 'Please do not underestimate the value of this kind of transport, where young people are together with others going to their school/college and the security and support it gives to the families, especially the siblings going to other schools, of a vulnerable CYP with SEN.'

14. What additional support or resources do you think young people who make use of the service might need during the transition to the new policy?

- Many respondents wanted to see the Independent Travel Training programme address safety and stranger awareness, as well as be available for as long as necessary until the young person in question feels comfortable with their journeys.

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 <p style="font-size: 24pt; font-weight: bold; margin-top: 10px;">Brent</p>	<p style="font-size: 18pt; font-weight: bold; margin: 0;">Cabinet</p> <p style="font-size: 16pt; margin: 0;">17 June 2024</p>
	<p style="font-size: 14pt; font-weight: bold; margin: 0;">Report from the Corporate Director of Partnerships, Housing & Residents Services</p>
	<p style="font-size: 14pt; font-weight: bold; margin: 0;">Lead Member – Cabinet Member for Employment, Innovation and Climate Action (Councillor Jake Rubin)</p>
<p style="font-size: 16pt; font-weight: bold; margin: 0;">Corporate Performance update and Q4 reporting</p>	

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
List of Appendices:	One Appendix A: Borough Plan Q4 Scorecard
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	<p>Jon Cartwright, Head of Change and Customer Insight, Partnerships, Housing & Residents Services 020 8937 1742 Jon.Cartwright@brent.gov.uk</p> <p>Stephanie Keen, Senior Research and Intelligence Officer, Partnerships, Housing & Residents Services 1492 Stephanie.Keen@brent.gov.uk</p> <p>Julia Pieza, Senior Research and Intelligence Officer, Partnerships, Housing & Residents Services 4511 Julia.Pieza@brent.gov.uk</p> <p>Anisha Fernandes Senior Performance Officer, Partnerships, Housing & Residents Services 020 8937 3927 Anisha.Fernandes@brent.gov.uk</p>

1.0 Executive Summary

- 1.1. This report and the performance scorecard (Appendix A) sets out the position on the Council's performance in the fourth quarter of 2023/24. The content of the report and scorecard focus on progress in delivering the in delivering the priorities and outcomes set out in the Council's Borough Plan 2023-2027: Moving Brent Forward Together.

2.0 Recommendation(s)

Cabinet are recommended to:

- 2.1 Note the Borough Plan 2023/24 performance reporting for Q4 set out from 3.2 and included in Appendix A, and:
- 2.1.1 Consider the current and future strategic risks associated with the information provided and agree remedial actions on strategic risks as appropriate.
- 2.1.2 Challenge progress with responsible officers as necessary.

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 This report provides detailed reporting against the suite of Key Performance Indicators (KPIs) developed to monitor delivery of the desired outcomes (i.e., 'what success will look like' measures) set out in the Borough Plan 2023-2027: Moving Brent Forward Together. This includes progress updates for key activities and commentary against targets aligned to each of the five priority areas:
- Prosperity and Stability in Brent
 - A Cleaner, Greener Future
 - Thriving Communities
 - The Best Start in Life
 - A Healthier Brent

3.2 Borough Plan performance Q4

- 3.2.1 Overall, there are **55** Borough Plan key indicators in the Q4 performance scorecard.
- 3.2.2 KPIs are rated Red, Amber or Green depending on their performance against the target for the quarter.
- Green KPIs have met or exceeded their target
 - Amber KPIs are between 0.01% and 5% outside of their target
 - Red KPIs are 5% or greater outside their target

Of the 55 Borough Plan indicators for Q4:

- 24 are on or above target (Green)
- 2 are just off target (Amber)
- 12 are off target (Red)
- 17 provide contextual information

3.2.3 A summary of performance is outlined in the following sections. Where relevant the commentary also references progress against annual targets in addition to quarterly e.g., where progress towards the target is seasonal.

Prosperity and Stability in Brent

Red KPIs

3.2.4 There have been 264 affordable homes delivered by external providers (incl. S.106) YTD, against a target of 461. The Q3 report had incorrectly reported 420 homes delivered, this was due to a duplication of a scheme in the reporting. This has now been corrected. The target for external providers was based on initial profiling of schemes expected to be delivered in 2019 when the original commitment was made by the Council. Whilst the 2023/24 annual target was not met, the Council is on track to achieve the overarching target of 5,000 new affordable homes in the borough by 2028, with a total of 3,606 being completed to date. Of the 3,606, 834 have been delivered directly by the Council. Schemes being delivered by both external providers and the Council have been heavily impacted by rising construction costs, economic turbulence and a shortage of labour. Additionally, some schemes already on site have required further designs to incorporate new requirements such as a second staircase for evacuation purposes. This has led to longer build times and therefore delayed completions.

3.2.5 The number of Council homes delivered is rated Red with 12 units provided in Q4. The year-to-date performance includes 131 Council homes delivered against a target of 291. Again, the target was based on historic profiling and alongside the 834 homes that have already been completed, there are a further 1,211 on site and due for completion by 2028. In Q4 the Council faced delays to schemes such as Brent Indian Community Centre, Learie Constantine, Anuerin Bevan Court and Pharamond (a total of 74 homes) which is the reason for year's performance being lower than the forecast. The second phase of this programme will see an additional 572 homes added to the pipeline being developed.

3.2.6 The number of Houses of Multiple Occupation licensed in the borough is rated Red with 4,858 HMOs licensed against a target of 5,500 in Q4. There has been a reduction of approximately 200 properties from the highest 2023-24 monthly outturn. This may be symptomatic of factors affecting the HMO rental market and the Article 4 direction. The team will be increasing communication and enforcement activities to maintain HMO applications.

3.2.7 The average days taken to process new benefit claims is rated Red with claims taking 21 days to process against a target of 19 days YTD. Temporary Accommodation and Supported Accommodation complex cases have had an

impact on YTD performance figures. Improvement in Temporary Accommodation process for licenses and rent accounts is expected to improve performance.

- 3.2.8 The average number of days taken to process Resident Support Fund applications is rated Red, with 26 days against a target of 20 YTD. However, in Q4 performance indicates improvement with applications taking on average 18 days to process. Processing days in April 2023 and May 2023 have brought the overall average down, however throughout the rest of year the target was met.

Amber, Green and Contextual KPIs

- 3.2.9 The average days taken to process change events for benefit claims is rated Amber YTD due to changes taking 5.3 days to process against a target of 5 days, although this has reduced from 8 days in Q3. The average days figure for Q4 was 3.85 days which shows significant improvement despite the YTD figures missing the target. Processing days for changes in circumstances have achieved mostly due to rent increases 1 day in the month of March 2024.
- 3.2.10 The number of empty properties refurbished and brought back into use within the borough is rated Green with 115 properties refurbished at the end of Q4 against a target of 100 by the end of the financial year. Due to several property grants completing within the last quarter and an increase in properties brought back into use through the Council's intervention the team has exceeded their annual target.
- 3.2.11 The percentage of Brent Start overall achievement per academic year (July-Sept) for Q4 was 93% and rates Green. In year achievement (terms 1 and 2) is positive and is inline as per projection. The final term is yet to be concluded and in which exams are taken. We are confident that achievement rate will be similar to the previous year. The final achievement will be published in Oct 2024 after the data is validated by GLA.
- 3.2.12 Measures for both Jobs and Apprenticeship Outcomes from Brent Works are rated Green and have exceeded targets providing 65 jobs and 11 apprenticeship opportunities in Q4. Overall, the year-end figures show 220 jobs were provided against a target of 190, and 50 apprenticeships. Outcomes include jobs in the construction sector, hospitality, care, education and IT. The employment team have exceeded the target outcomes as a result of working closely with business, matching residents to their job vacancies. In addition, the success of the Brent Works Jobs Fair has contributed to securing employment for Brent residents.
- 3.2.13 The number of local apprenticeship/work experience opportunities (Social Value and Ethical Procurement Policy) was also above target providing 125 opportunities throughout the year against a target of 20. Social Value commitments embedded through the Council's Procurements have been successful in surpassing the apprenticeship target for the year. Procurement will continue to include requirements for suppliers to offer the community of

Brent opportunities of work experience either through apprenticeships, work placements or new jobs as part of our social value action plan.

- 3.2.14 The percentage of local suppliers used by the Council was rated Green with 42% against a target of 40%. This has remained the same since Q3. Although, no local procurement has taken place as part of our local supply chain in Q4, the Council has been actively providing opportunities for the local supplier base to be part of.
- 3.2.15 The percentage of jobs secured paying London Living Wage for Q4 was 84% rating it Green above the target of 75%. The employment team promotes LLW as part of the Mayor's Good Work Standard initiative and the team have been attracting higher skills role which attracts higher pay, for example Gas safe engineers, and Surveyors.
- 3.2.16 The number of residents accessing Community Hubs was 5,510 in Q4. The year-to-date performance shows 20,371 residents have accessed community hubs against a target of 14,000 rating the measure Green. During this period, enquiries remained consistent. Enquiries were significantly higher than the same period last year. Support with form filling remained high, with nearly 300 forms filled out each month. This increase in form filling could explain the surge in demand for the hub's services.
- 3.2.17 The percentage of enquiries at the Community Hubs resolved at point of contact was 82% at the end of Q4 rating the measure Green. The percentage of resolved inquiries has consistently exceeded the target in Q4. This could be attributed to the reintegration of several long-term sick employees, which has resulted in improved resources at the hubs.
- 3.2.18 A contextual measure for the Community Hubs shows that 744 referrals to foodbanks were made through Brent Hubs in Q4. Food aid enquiries remain consistent. Analysis indicates new people are making requests for the first-time month on month. This trend suggests a potential increase in the number of individuals seeking food aid assistance.
- 3.2.19 The number of affordable homes delivered by i4B in Q4 was 5 with the year-to-date performance being 16 properties, against a target of 12 meaning the target for this financial year has been exceeded. i4B's purchasing target for 2024-25 will be 25 properties and the company is continuing to review various opportunities such as blocks of new builds and street properties to build the portfolio further and contribute to housing homeless families in Brent.

Cleaner, Greener Future

Red KPIs

- 3.2.20 The target to decrease the amount of non-recyclable waste (tonnage) borough wide by 2% by April 2024 is rated Red. The amount of non-recyclable waste was 18,564 tonnes in Q4. The year-to-date performance for this measure stands at 72,725 tonnes against a target of 68,674 tonnes. Since diverting

communal recycling to residual waste in Q3, this has decreased our recycling contamination levels. To further decrease recycling contamination levels, the team will be rolling out food caddies to communal residents in phases starting in Q2 24/25 financial year. The team have challenged Veolia to complete further spot checks on communal recycling ensuring non-contaminated recyclables are sent to be recycled. Finally, the team is working on targeted messaging per major contaminate to further improve our recycling rates in the new financial year.

3.2.21 The value for customer reported Category 2 defects repaired on time in Q3 was 79% against a target of 98% rating the measure Red. There are several reasons for the poor performance in quarter 4. The majority of late repairs are road markings and delays have been experienced due to inclement weather resulting in work often being completed outside the deadline date. The contractor has been late in updating Symology for completed works and therefore they have been classified as late even if completed on time. There has been an increase in customer reports and more high priority defects being identified. This has placed pressure on the contractor to efficiently resource gangs to deal with peaks in workload. The contractor has agreed to provide more resources to deal with the peaks in workload. They will also train their operatives to update Synology from site using handhelds.

Amber, Green and Contextual KPIs

3.2.22 The number of new electric vehicle charge points year-to-date is 258, rating the measure Green. There were 28 dual socket chargers installed by Zest and funded by Uber and Zest. There are 52 locations left to be installed.

3.2.23 There are two contextual KPIs related to Brent's climate aims. The number of businesses utilising Council's new carbon footprinting tool for Q4 is 11. The number of businesses signed up to the Brent Climate Charter stands at 13. Both projects have had less focus due to a vacant Senior Sustainability post. Due to the time constraints of the UKSPF funded Camden & Brent Business Climate Challenge (CBBCC) the Climate Emergency team also prioritised that project with the resource they had available. Now that the Senior Sustainability post has been filled the team expects numbers for both measures to increase due to the engagement work being carried out.

3.2.24 The number of homes retrofitted/receiving energy efficiency improvement Social Housing Decarbonisation Fund, Carbon Offset Fund or other funding stream is another contextual measure. The Council has received funding to retrofit 127 properties over a 2–3-year period which is the long-term target for this project. In Q4, 2 properties received funding from the Social Housing Decarbonisation Fund and 2 property retrofits from CO2GO were completed.

Thriving Communities

Red KPIs

3.2.25 There are no Red KPIs for Thriving Communities.

Amber, Green and Contextual KPIs

3.2.26 There were 73 hours contributed toward supporting events within the community as part of the Social Value and Ethical Procurement Policy in Q4. The YTD figure for this indicator is 467.5 hours against a target of 80, rating this KPI Green. This includes training and bespoke events with involvement from the Council's suppliers. Social Value commitments through our Procurements have been successful in obtaining supplier buy in supporting the delivery of better outcomes for the community through training and events. Procurement will continue to work with Directorates across the Council to target key areas that will support valuable support and delivery of key outcomes to the communities of Brent.

3.2.27 There are several contextual measures for Thriving Communities. 25 engagement events took place across the community in Q4. The decrease in number of engagement events compared to last quarter is due to a couple of factors. The autumn/winter period means there are less events in the community. This quarter also aligned with the grants process meaning the Social Infrastructure team were focused on this piece of work.

3.2.28 In Q4 the Grants team completed assessments for the Community Grants Fund (NCIL) with 35 projects being provisionally awarded full or partial funding subject to final stage due diligence checks. The Love Where You Live programme has also continued to run monthly, and £1,325,748.70 of funding has been awarded for all programmes in Q4. Final due diligence checking is underway for the successful projects and 2 have been awarded over £100k and will require Cabinet to ratify after the May elections. There have been 56 grants awarded in Q4 through programmes such as Love Where You Live (LWYL) programme. The total number of grants awarded YTD is 116.

3.2.29 There were two Brent Connects rounds over this period. In total 10 meetings took place garnering 271 attendees across all. Further promotion of the Brent Connects forum is planned for Your Brent magazine (September edition) ahead of the new season of Brent Connects starting in October.

The Best Start in Life

Red KPIs

3.2.30 The number of youth inspection of Council and commissioned services is rated Red for Q4. Recruitment to the 'Care Quality Ambassador' (CQA) role filled by Care Experienced Young People has impacted the delivery of this measure. 4 out of 7 CQA's have been recruited to date with recruitment ongoing to fill the remaining posts. The remit of the roles is to review Council commissioned services with a focus on external providers of placements for looked after children and care leavers. Training has taken place in April and a programme of quality assurance activity will commence on 6 May 2024 whereby 20 supported providers will be visited through May, June and July. This quality

assurance activity will involve desktop research and a visit to the provider and listening to the lived experiences of young people there.

3.2.31 The number of participants regularly attending Care Leavers in action, Care in action and Junior care leavers in action was 25, missing a target of 30. Young people from these groups continue to attend and contribute to wider council meetings. For example, we had 4 young people from Care Leavers in action (CLIA) attended corporate parenting briefings, 2 attended the corporate parenting panel and 3 young people attended the Voice and influence subgroup. The new Participation Manager has been planning with young people what works best for session times and activities to increase attendance and participation. Plans are underway to launch 'Brent Care Journeys phase 2.0' in December 2024 which will bring together Brent's Care Journey Care in Action and Care Leavers in Action together to improve engagement with young people and from a range of different communities.

3.2.32 The percentage of all children becoming the subject of Child Protection (CP) Plan for a second or subsequent time and the percentage of those with a factor of gangs, missing, CSE and criminal exploitation as their main factor in their assessment was 14.8%, slightly higher than the target of 13.5%. The percentage of children with a repeat CP plan with these specific factors (14.8%) is higher than the percentage of all children subjected to repeat plan (12.9%), highlighting the level of complexity of children and young people subject to a child protection plan. Children on repeat plans continue to be reviewed by the Localities Service Manager to identify if there is any learning that can be implemented into practice to prevent repeat plans.

Amber, Green and Contextual KPIs

3.2.33 The percentage of Looked After Children (LAC) in education, employment, or training (EET) (Year 12 and 13) was 76%, below the target of 80% rating the measure Amber. The number of Looked After Children that are EET has remained steady since the last reporting period. There is ongoing work with Brent Works to help young people engage in and remain in suitable EET opportunities. When a young person finds a course or training that is not for them, they are assisted to find a suitable alternative.

3.2.34 The percentage of Care Leavers (19-21 years old) in education, employment, or training (EET) was 58% exceeding the target of 57% rating the measure Green. The proportion of Care Leavers in education, employment, or training (EET 19 – 21 years of age cohort) in March 2024 was 70.5% which was the highest figure this reporting year and reflects effective cross Council working to support young people's prospects. This brings the YTD position to 58% which has met the annual target of 57% and is in line with London averages.

3.2.35 The percentage of pupils attending Brent Schools which are rated good or outstanding is 97.5% higher than the target of 95%. Pupils who are attending two schools that have never had an inspection are excluded from this measure. All schools are provided with a proportionate level of support from School Educational Lead Professional (SELP) to help maintain standards. Where

additional support is required, this is put in place for an appropriate length of time.

- 3.2.36 The number of youths who regularly attend the Care Leavers Hub was 34 surpassing the target of 30. A meeting has been held with young people who are part of the Care Leavers Hub WhatsApp group to ascertain how they wish the group to operate in the future. This has been supported by the Participation Manager to ensure consistency in approach with other participation activity.
- 3.2.37 The number of young people who regularly attend the Brent Youth Parliament (BYP) was 35 exceeding the target of 25. BYP has represented young people in meetings at local, regional, and national levels, where they have ensured issues important to young people are raised in decision-making forums with senior leaders. This includes three young people representing Brent as Members of the UK Youth Parliament (MYPs) and speaking in the House of Commons, attending All Party Parliamentary Groups, and working with MYPs from across the UK on the Food for Learning national campaign. BYP has also participated in the London Youth Assembly, representing Brent's young people in discussions about the GLA's budget and plans for young people. Attendance at BYP's January meeting was the highest for several years with a core membership of around 40 young people. Work is ongoing to encourage young people to regularly attend through the BYP Executive Group, using the views of young people to select topics to be discussed and ensuring young people have access to national opportunities as described. Following BYP members' attendance at Scrutiny Committee, there is a planned meeting with the Chair of CWB Scrutiny.
- 3.2.38 The number of registered services users that have had a contact with Family Wellbeing Centres (FWC) was 15,849 surpassing the target of 10,767. This exceeds the 2022/23 outturn by 10%. Children and Young people continue to promote the FWC offer across Brent to reach new families and connect them into the range of services on Offer.
- 3.2.39 The measure to reduce the percentage of young people from Black African, Caribbean, and Somali communities who are permanently excluded is rated Green. In Q4 there were 5 suspensions, and the aim is to keep this number as low as possible. The use of managed moves and in school support has prevented many fixed term exclusions from becoming permanent exclusions. Seven permanent exclusions were prevented in March 2024 of which two were from Black Caribbean communities. Schools both in Brent and out-of-borough are provided with on-going targeted support and training in relation to individual pupils to keep permanent exclusion numbers low.
- 3.2.40 There are five annual measures that are contextual. The percentage of Looked After Children achieving 4-9 pass in English and Math is 24%. Detailed data is being analysed to inform next step in supporting underachieving groups. A report on performance with actions to be taken was presented to the CP committee.

3.2.41 The following paragraphs detail progress against the measure to raise the attainment of young people from Black African, Caribbean, and Somali communities to close the gap with national averages at the following academic points. The April Community Wellbeing Scrutiny Committee considered this issue and plans to continue to improve performance, as part of the annual School Standards and Achievement report:

Early Years - Good Level of Development (GLD): Brent performance for children from a Black African, Caribbean, and Somalian heritage is 63.4% overall compared with 67.2% nationally of all pupils (a gap of 3.8%). However, there is some variation in the attainment of different groups.

Year 1 - Phonics: Brent performance for children from a Black African, Caribbean, and Somalian heritage is 79.2% overall, slightly better than 78.9% nationally of all pupils.

End of KS2 – Reading, Writing and Maths: Brent performance for children from a Black African, Caribbean, and Somalian heritage is 60.5% overall compared with 63.6% nationally of all pupils (a gap of 3.1%). However, there is variation in the attainment of different groups.

End of GSCE - Attainment 8: Brent performance for children from a Black African, Caribbean, and Somalian heritage is 45.9 points overall compared with 50.4 points nationally of all pupils (a gap of 4.5 points).

The local authority and school leaders are focussing on actions to improve outcomes for underperforming groups. The local authority is funding 'Leading from the top training, delivered by Brent School Partnership, that supports schools to be inclusive and to develop anti-racist practice.

A Healthier Brent

Red KPIs

3.2.42 The percentage of Care Act assessments completed within 28 days (excluding SMART and OT) was 54% against a target of 80% in Q4, which remains the same as Q3. Performance is currently moving in the right direction but there is still more work to be done to achieve the target. Standard Operating Procedure (SOP) has now been implemented and will be reiterated at all staff events. Managers are responsible to ensure good practice is implemented in line with the SOP across the service. The team has a DMT dashboard where service performance is monitored in monthly DMT Performance and Finance meetings. In addition, the PSW and POT also have a responsibility to monitor performance across their lead professions. Work is also currently in progress to develop a portal to allow carers assessment to be completed in a quick and efficient way. The Duty team had reduced staff capacity due to recruitment and retention issue and work is currently in progress to reduce the backlog of assessments.

3.2.43 New birth visits within 14 days are 89.1% YTD, below the contractual target set (target at 95%). The service continues to experience an extreme shortage of health visitors and there is an entry on the Trust and LA risk registers regarding this. However, visits by 30 days which is the statutory requirement are 97.6% (YTD), very close to the 98% target. A detailed plan for those who are not seen by 30 days is shared with the Commissioner, and an ongoing recruitment campaign is delivered by the provider. The Brent Public Health team is also closely monitoring the provider performance through monthly contract meetings. There are some ongoing management processes underway in order to improve performance. The issue has been escalated up to the provider Chief Executive. A Recovery Board is to meet under the governance of the ICP.

Amber, Green and Contextual KPIs

3.2.44 The reablement sequel to service is rated Green with 77% against a target of 75% at the end of Q4. The team has been in the process of procuring reablement providers to deliver better reablement outcomes. Meanwhile physiotherapists have moved to employment of CLCH from 31/12/2023 and the team will be closely monitoring the impact of their input in achieving the target.

3.2.45 The total number of adults in structured treatment YTD was 1,211 and this is against a local year-end target of 1,200, rating the measure Green. There has been recruitment of new staff into Public Health focusing on Criminal Justice and Women's Pathways. In addition, there are weekly contact with management leads at Via and extensive service user engagement and involvement through B3 Service User Council.

3.2.46 There are three Green indicators for Brent Health Matters (BHM). The number of Brent Health Matters (BHM) community events held was 135 YTD exceeding the target of 120. These events are run across all Brent neighbourhood areas, working with local community organisations. The BHM programme has also involved 246 health checks in Q4 bringing the YTD number of health checks to 3,051 against a target of 3,000. At each outreach event a number of health checks are completed and include BMI, blood pressure, heart rate and diabetes risk score. Events include Health Check events or Health Promotion events. Although Q4 numbers are lower than Q3, there was a higher proportion carried out for high priority groups. This reflects decisions made about improved targeting in response to monitoring inequality impacts. The BHM programme has also engaged with 428 organisations in Q3 bringing YTD performance to 1,652 against a target of 1,400.

3.2.47 The BHM programme also raised 935 escalations YTD, this is a contextual measure. This is a measure of unmet health need being detected. Although Q4 numbers are lower than Q3, there was a higher proportion carried out for high priority groups. This reflects decisions made about improved targeting in response to monitoring inequality impacts.

3.2.48 There are two contextual measures concerning long-term support needs of older adults and younger adults met by admission to residential and nursing care homes. In Q4 55 long-term support needs of older adults were met by

admission to residential and nursing care homes per 100,000 population; and 4 long-term support needs of younger adults were met by admission to residential and nursing care homes. For both KPIs smaller numbers indicate better performance. The team is constantly reviewing the authorisation processes, particularly for short-term placements to ensure that community-based care is considered before approving a long-term residential/nursing care. The ICB is actively reviewing nursing placements and transferring those placements to ASC if they do not meet CHC funding criteria. Social workers are reviewing placements and it has been evidenced in the QAM process that the brokerage team is negotiating down the cost of the expensive placements with providers. In addition, supported living and extra care housing options are considered prior to making permanent residential/nursing placements. The data for these measures are provided by ASCOF and updated annually.

4.0 Stakeholder and ward member consultation and engagement

4.1 KPIs for the Borough Plan 2023-27 were developed in consultation with directorate performance leads.

5.0 Financial Considerations

5.1 There are no financial implications as a result of this report.

6.0 Legal Considerations

6.1 There is no statutory duty to report regularly to Cabinet on the Council's performance, however under the Local Government Act 1999 a best value authority has a statutory duty to secure continuous improvement in the way in which its functions are exercised having regard to a combination of economy, efficiency and effectiveness. Regular reports on the Council's performance assist in demonstrating best value.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

7.1 There are no direct diversity implications.

8.0 Climate Change and Environmental Considerations

8.1 Indicators that support delivery of the Brent Climate Emergency Strategy are included in the 'Cleaner, Greener Future' section of this report.

9.0 Human Resources/Property Considerations (if appropriate)

9.1 There are none.

10.0 Communication Considerations

10.1 There are none.

Related document(s) for reference

Cabinet (11 March 24) - Corporate Performance update and Q3 reporting

Report sign off:

Peter Gadsdon

Corporate Director of Partnerships
Housing and Resident Services

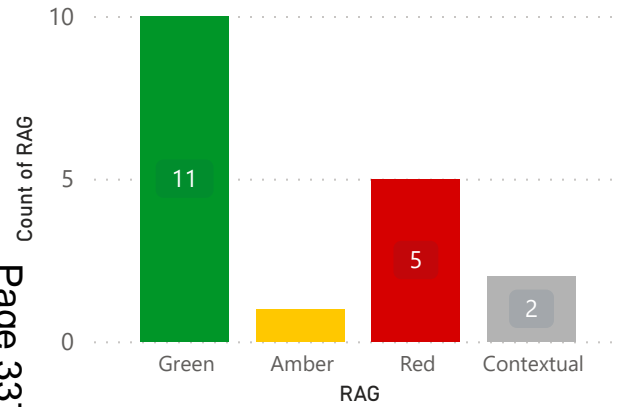
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Corporate Performance Report - 2023-24 Q4

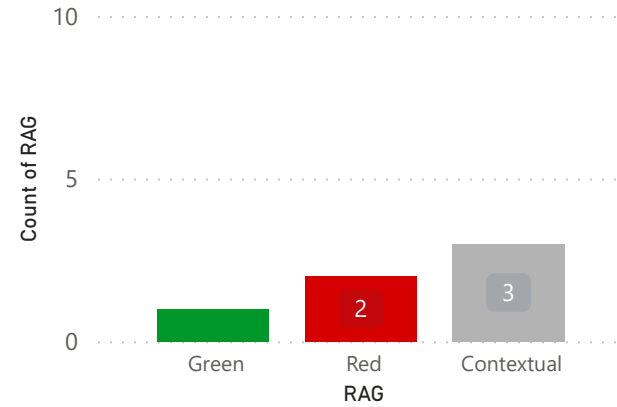


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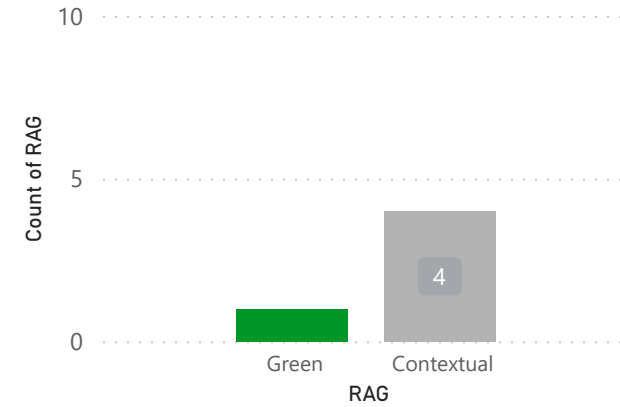
Prosperity and Stability in Brent



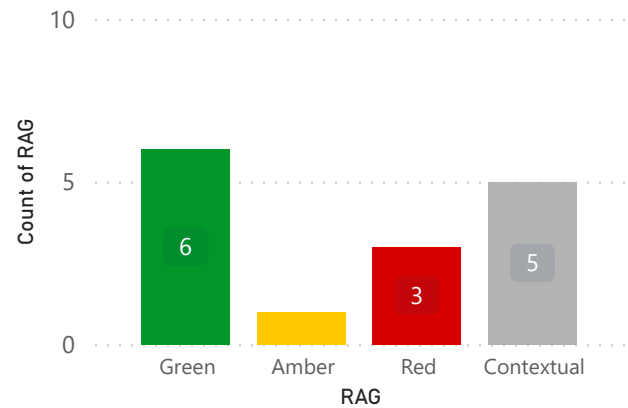
A Cleaner Greener Future



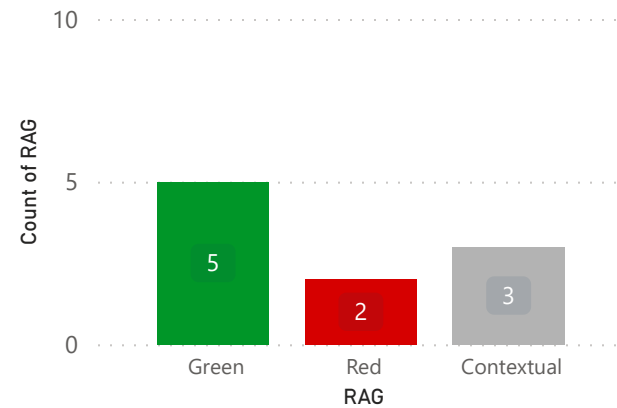
Thriving Communities



The Best Start in Life



A Healthier Brent



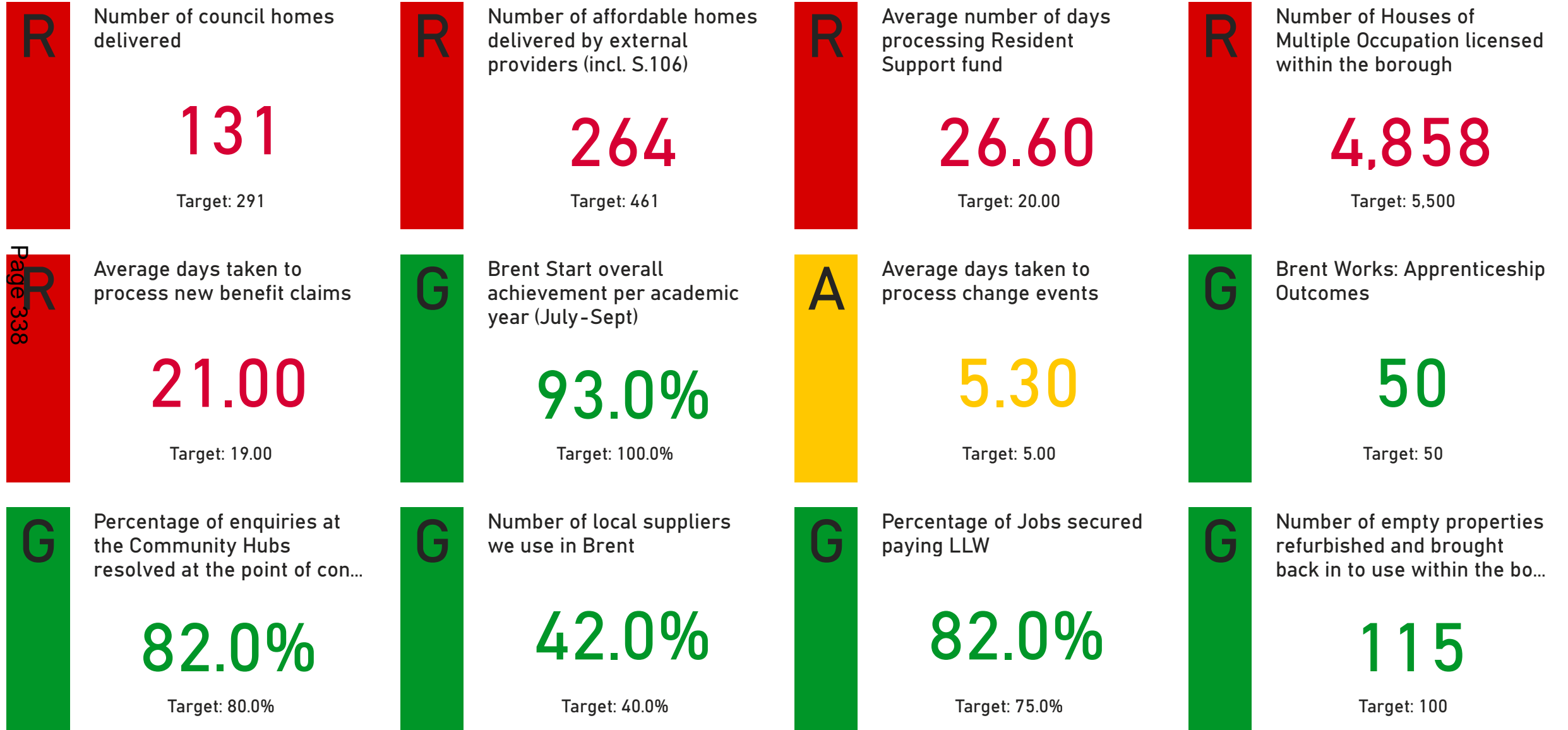
Key for Performance Rating

Unless otherwise defined, performance information is assessed using the following tolerances to give a RAG rating:

- Green** – At target or exceeding target
- Amber** – 0.01% - 5% outside target
- Red** – Greater than 5% outside target,
- Contextual** – No target set
- n/a** – Data not available

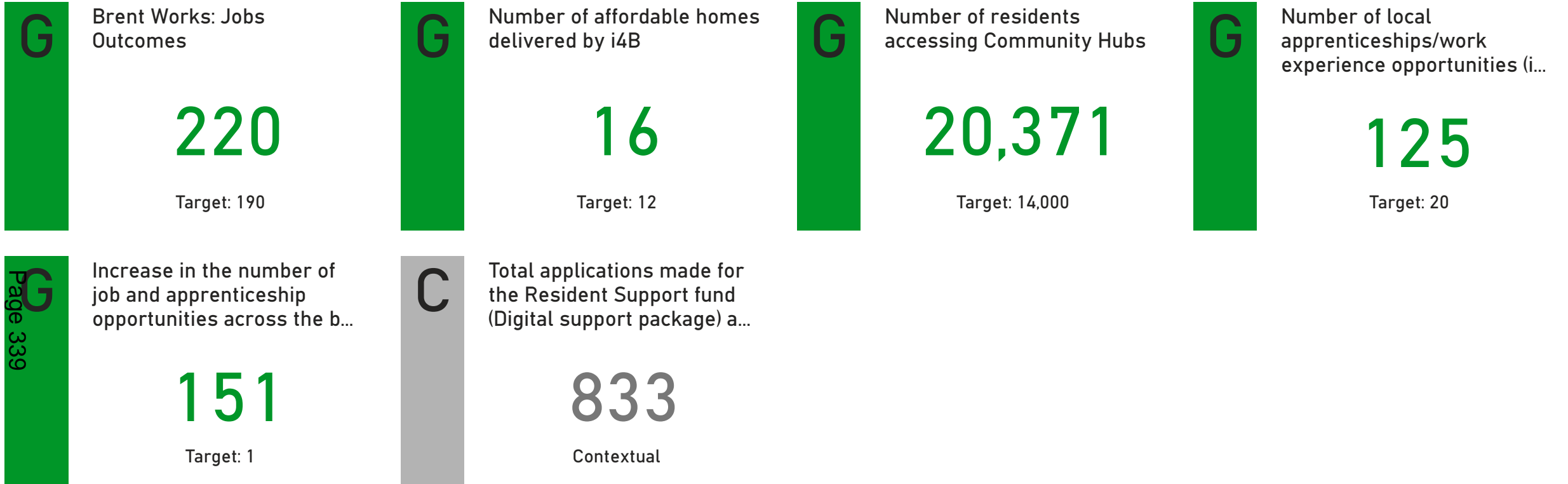
Corporate Performance Report - 2023-24 Q4

Prosperity and Stability in Brent



Corporate Performance Report - 2023-24 Q4

Prosperity and Stability in Brent



Corporate Performance Report - 2023-24 Q4

A Cleaner Greener Future

R

Reported and inspected category 2 defects repaired on time

79.0%

Target: 98.0%

R

Decrease the amount of non-recyclable waste (tonnage) borough wide by ...

72,725

Target: 68,675

G

Number of new electric vehicle charge points

258

Target: 258

C

Number of businesses signed up to the Brent Climate Charter

13

Contextual

Page 340

C

Number of businesses utilising council's new carbon foot printing tool

19

Contextual

C

Number of homes retrofitted/receiving energy efficiency improvements via Social Housing Decarbonisation Fund, ...

4

Contextual

Corporate Performance Report - 2023-24 Q4

Thriving Communities

G

Hours contributed toward supporting events within the community [SVEPP]

457.50

Target: 80.00

C

Increase in the number of engagement events that take place across the com...

175

Contextual

C

Total amount of funding awarded through grants

£1,443,316

Contextual

C

Total number of grants awarded

116

Contextual

C
Page 341

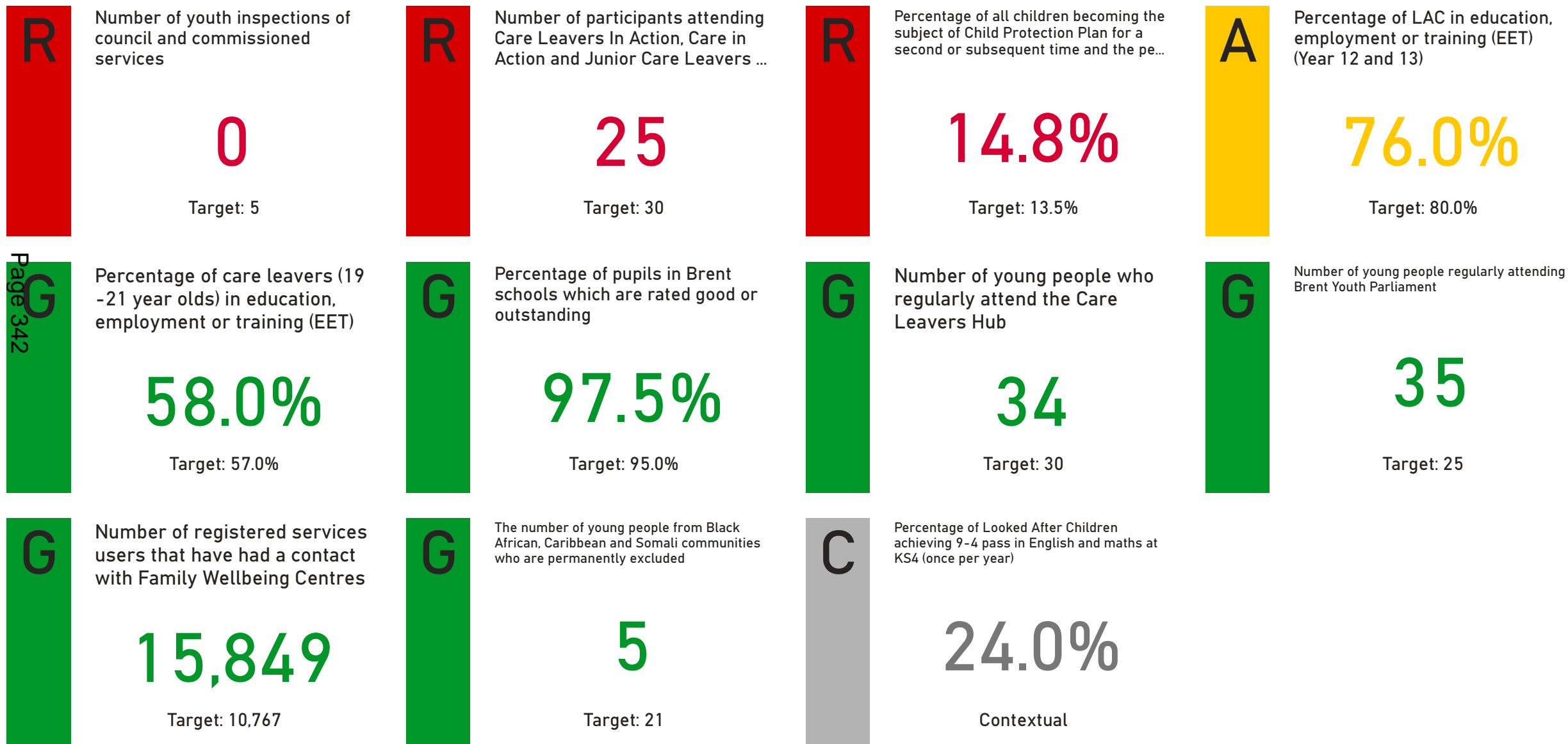
Total number of residents attending Brent Connects meetings

456

Contextual

Corporate Performance Report - 2023-24 Q4

The Best Start in Life



Corporate Performance Report - 2023-24 Q4

The Best Start in Life

C

Raise attainment of young people from Black African, Caribbean and Somali communities : End of KS2 – Reading, Writing and Maths

60.5%

Contextual

National data: 63.6 %

C

Raise attainment of young people from Black African, Caribbean and Somali communities: Year 1 – Phonics

79.2%

Contextual

National data: 78.9 %

C

Raise the attainment of young people from Black African, Caribbean and Somali communities to close the gap with national averages at the following academic points: End of GSCE - Attainment 8

45.9%

Contextual

National data: 50.4 %

C

Raise attainment of young people from Black African, Caribbean and Somali communities : Early Years – Good Level of Development (GLD)

63.4%

Contextual

National data: 67.2 %

Corporate Performance Report - 2023-24 Q4

A Healthier Brent

