



Brent

Cabinet

Monday 10 February 2025 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
Benea	Cabinet Member for Regeneration, Planning & Property
Donnelly-Jackson	Cabinet Member for Housing and Residents Services
Farah	Cabinet Member for Safer Communities, Jobs and Skills
Grahl	Cabinet Member for Children, Young People & Schools
Nerva	Cabinet Member for Adult Social Care, Public Health and Leisure
Rubin	Cabinet Member for Climate Action and Community Power
Krupa Sheth	Cabinet Member for Public Realm & Enforcement

For further information contact: James Kinsella, Governance Manager, Tel: 020 8937 2063; Email: james.kinsella@brent.gov.uk

For electronic copies of minutes and agendas please visit:

[Council meetings and decision making | Brent Council](#)

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 Wednesday 15 January 2025 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 provided, in accordance with Standing Order 66.

Members are asked to note that there are currently no petition(s) due to be presented at the 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.

Partnership, Housing & Resident Services

7 Review of working age Council Tax Support Scheme for 2025-26 11 - 158

This report presents the outcome of the consultation process undertaken on proposed changes to the Local Council Tax Support (CTS) scheme 2025-26 and seeks Cabinet approval to recommend the proposed changes to Full Council on 27 February 2025.

Ward Affected:
All Wards

Lead Member: Cabinet Member for Housing and Resident Services (Councillor Fleur

Donnelly-Jackson)
Contact Officer: Asha Vyas, Head of Customer
Services & Assessments
Tel: 020 8937 2705
asha.vyas@brent.gov.uk

Finance & Resources reports

8 Budget & Council Tax 2025-26 159 - 510

This report sets out the Council's budget proposals for 2025 - 26. It also sets out the results of the consultation, scrutiny and equalities processes. Subject to approval by Cabinet, these will form the basis of the budget to be considered at the Full Council meeting on 27 February 2025.

The report also sets out the overall financial position facing the Council for the medium term and highlights the significant risks, issues and uncertainties.

Ward Affected: All Wards
Lead Member: Deputy Leader and Cabinet Member for Finance & Resources (Councillor Mili Patel)
Contact Officer: Ravinder Jassar, Deputy Director of Finance
Tel: 0208 937 1487
ravinder.jassar@brent.gov.uk

9 Treasury Management Mid-Year Report 2024 - 25 511 - 544

This report updates Members on Treasury activity for the first half of the financial year 2024/25 (Quarters one and two). The Local Government Act 2003 and the Local Authorities (Capital Financing and Accounting) Regulations 2003 require that regular reports be submitted to the relevant Council Committee detailing the Council's treasury management activities.

Members are asked to note that Members are asked to note that the report has also been subject to consideration and review by the Audit & Standards Advisory Committee on Wednesday 4 December 2024.

Ward Affected: All Wards
Lead Member: Deputy Leader and Cabinet Member for Finance & Resources (Councillor Mili Patel)
Contact Officer: Amanda Healy, Deputy Director of Finance - Infrastructure & Investment
Tel: 020 8937 5912
Amanda.Healy@brent.gov.uk

Children and Young People reports

10 Authority to award contract for the provision of Speech & Language Therapy (SLT) for Children & Young People in Brent and Out of Borough Schools 545 - 570

This report concerns the procurement of a contract in respect of Speech and Language Therapy (SaLT) for children and young people in Brent schools and out-of-borough schools who have speech and language therapy needs identified in section F of their Brent Education Health Care Plan, to Central London Community Healthcare Trust (CLCH) NHS pursuant to the Provider Selection Regime. The report requests authority to award the contract as required by Contract Standing Order 88 and summarises the process undertaken in tendering this contract.

Ward Affected: All Wards
Lead Member: Cabinet Member for Children, Young People & Schools (Councillor Gwen Grahl)
Contact Officer: Michelle Gwyther, Head of Forward Planning, Performance and Partnerships
Tel: 020 8937 2499
Michelle.gwyther@brent.gov.uk

Community Health & Wellbeing reports

11 Authority to Tender contracts for the Provision of Extra Care Housing Support for six Extra Care Schemes 571 - 584

This report concerns the procurement of Extra Care Housing (ECH) support for six extra care schemes. This report requests approval to invite tenders for the provision of ECH support services that will be split into two contracts or lots to cover the six extra care schemes at Beechwood Court, Harrod Court, Tulsi House (Lot 1); and Rosemary House, Newcroft House and Willow House (Lot 2).

Ward Affected: Kingsbury; Stonebridge; Sudbury; Wembley Central; Wembley Hill; Willesden Green
Lead Member: Cabinet Member for Adult Social Care, Public Health and Leisure (Councillor Neil Nerva)
Contact Officer: Mark Mulvenna, Supplier Relationship Manager, Community Health & Wellbeing
Tel: 020 8937 4139
mark.mulvenna1@brent.gov.uk

Partnership, Housing & Resident Services reports (continued)

12 Authority to Award Housing Repairs and Maintenance Contracts 585 - 606

This report concerns the outcome of the tender for the housing repairs and maintenance contract which expires 31 March 2025. This report requests authority to award contracts as required by Contract Standing Order 88 and summarises the process undertaken in tendering these

contracts.

Ward Affected:
All Wards

Lead Member: Cabinet Member for Housing & Resident Services (Councillor Fleur Donnelly-Jackson)

Contact Officer: Ryan Collymore, Head of Housing Property Services
Tel: 020 8937 1204

Ryan.Collymore@brent.gov.uk

13 Authority to Tender for the Provision and Management of Temporary Accommodation Housing Association Leasing Scheme 607 - 626

This report requests approval to invite tenders in respect of the Procurement and Management of Temporary Accommodation in support of the Council's Housing Association Leasing Scheme (HALS) as required by Contract Standing Orders 88 and 89.

Ward Affected:
All Wards

Lead Member: Cabinet Member for Housing & Resident Services (Councillor Fleur Donnelly-Jackson)

Contact Officer: Laurence Coaker, Director - Housing Needs & Support

Tel: 020 8937 2788

laurence.coaker@brent.gov.uk

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.

15 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 12: Authority to Award Housing Repairs & Maintenance Contracts (Appendix 1 – List of Tenderers)

This appendix 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 and particular person (including the authority holding that information)."

The press and public will be excluded from the remainder of the meeting as the following report contains the following category of exempt information as specified in Paragraph 6, Schedule 12A of the Local Government Act 1972, namely:

"Information which reveals that the authority proposes - (a) to give under any enactment a notice under or by virtue of which requirements are imposed on a person; or(b) to make an order or direction under any enactment"

16 Addressing the risk of Anti-Social Behaviour in the Stonebridge area 627 - 642

This report updates Cabinet on action being taken to address the risk of Anti-Social Behaviour in the Stonebridge area.

(Agenda republished to include item on 6 February 2025)

Ward Affected:
Stonebridge

Lead Member: Cabinet Member for Housing and Resident Services (Councillor Fleur Donnelly-Jackson)

Contact Officer: Kate Daine, Head of Housing and Neighbourhoods

Tel: 020 8937 5440

Kate.Daine@brent.gov.uk

Date of the next meeting: Monday 10 March 2025



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](#)

This page is intentionally left blank



LONDON BOROUGH OF BRENT

MINUTES OF THE CABINET

Held in the Conference Hall, Brent Civic Centre on Wednesday 15 January 2025 at 10.00 am

PRESENT: Councillor M Butt (Chair), Councillor M Patel (Vice-Chair) and Councillors Fleur, Farah, Grahl, Nerva, Rubin and Krupa Sheth.

Also present: Councillors Ahmed, Dixon and Molloy.

1. **Apologies for Absence**

No apologies for absence were received at the meeting.

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 9 December 2024 be approved as a correct record.

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

None identified.

5. **Petitions (if any)**

No petitions were presented at the meeting.

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

There were no items referred from either the Community Wellbeing or Resources & Public Realm Scrutiny Committees.

7. **Neasden Civic Partnership Programme**

Prior to considering the report, Councillor Muhammed Butt (as Leader of the Council) welcomed Councillors Ahmed and Dixon to the meeting who, he advised, had asked to speak (as local Dollis Hill ward councillors) in support of the Neasden Civic Partnership Programme. Highlighting the diversity, history and vibrant nature of Neasden, Councillor Ahmed in opening his comments, also felt it important to recognise the challenges faced in the area, particularly in relation to social and economic inequalities. The proposals and funding (which it was noted included £3.1m in capital grant funding from the Mayor of London and up to £7.4m from

Brent's Strategic Community Infrastructure Levy) outlined within the report were therefore welcomed as a means of focussing delivery on a programme of transformative regeneration and sustainable development within Neasden Town Centre that would also, it was felt, enhance quality of life across the wider surrounding area.

In further support of the programme, particular reference was made by both Councillors Ahmed and Dixon to the public realm and highways improvements as well as potential to secure wider environmental sustainability, which had been identified as part of the programme, along with the engagement and collaboration undertaken with local residents, businesses and other key stakeholders in the co-design and development of the Neasden Town Centre Action Plan. It was noted this would form a key element in delivery of the programme designed to make Neasden a safer, greener and more prosperous area for all.

Having thanked Councillors Ahmed and Dixon for their comments, Councillor Muhammed Butt then introduced Rumi Bose (Rumi Bose Consultancy) who, he advised, had been invited to attend the meeting in order to provide (as supporting background information) an outline of the key elements of the programme and summary of the engagement undertaken to develop the Neasden Town Action Plan. The key issues covered within the presentation were as follows:

- The background and outline of the programme and development of the Neasden Town Centre Action Plan as the basis for submission of a bid under the Mayor of London Civic Partnership Programme (CPP), which had resulted in Brent being selected as one of 12 boroughs to join Stage 1 of the programme. As a result of work to develop the Action Plan, funded through the Stage 1 programme, a subsequent bid had been submitted for Mayor of London CPP Exemplar (implementation) funding with Brent having been one of five boroughs securing a share (£3.1m) of the stage two funding available.
- The key strategic principles around which development of the proposals and Neasden Action Plan had been based, which included the aim to enhance public realm; tackle climate change and ecology and enhance community programming and leadership.
- The detailed mapping process undertaken in relation to the socio, economic and infrastructure issues identified across Neasden as a basis to support development of the Action Plan.
- The detailed and extensive nature of the community engagement process undertaken to inform co-design of the Neasden Town Centre Action Plan, which had involved a range of methods including an online survey, collaboration with United Borders and the College of North West London aimed at reaching out to a younger demographic, engagement with local businesses and media outlets, a local hackathon, vox pops and walkabouts with key partners including the Metropolitan Police.
- The key proposals which had been included within the programme, focussed on the following core areas:
 - Public Realm –wayfinding for Neasden Town Centre including a route to Neasden Underground Station and Neasden Stations Growth Area, with new signage, lighting, landscaping, public art; Green infrastructure for Neasden Town Centre: sustainable urban drainage system, pocket forest trees and low-level planting.

- Cultural & Civic Programming – including the provision of a Meanwhile Lighthouse structure with access stairs and tower signage, internal first floor fit out for workspace and community uses and support for local market provision
- Eastern Gyrotory – reconfiguration, new access road, pavement, crossings, lighting and street furniture, to define and open up the gateway to Neasden Town Centre, improve access to The Grange, improve the route to Neasden Underground Station and Neasden Stations Growth Area.
- The design & planning along with construction timescales for delivery of each phase of the programme.

Having thanked Rumi Bose for the presentation, Councillor Muhammed Butt (as Leader of the Council and Cabinet Member for Housing, Regeneration, Planning & Growth) then moved on to introduce the accompanying report providing an update on the Neasden Civic Partnership Programme and seeking approval to the allocation of up to £7.4m Strategic Infrastructure Levy (SCIL) capital funding to deliver the associated public realm and highway infrastructure improvements for Neasden Town Centre.

In presenting the report, Cabinet noted the ambitious nature of the vision within the programme which had been developed working in partnership with local stakeholders, business, residents and the Mayor for London in order to address the long standing social, economic and physical challenges identified in relation to Neasden as a town centre and its surrounding communities. In seeking to build on the positive outcomes achieved through the engagement process, members were advised that the proposals had been designed to deliver a programme of regeneration activity that would not only improve the public realm and foster better connectivity but also strengthen social cohesion and safety across the area in order to ensure Neasden was able to benefit from being a vibrant, inclusive and sustainable part of the borough.

In expressing support for the proposals outlined within the report, members welcomed what they regarded as the transformational nature of change outlined within the vision and as a result of the additional investment being sought to unlock the area's potential, particularly in relation to the public realm and wider connectivity improvements with members also keen to ensure opportunities associated with wider infrastructure improvements such as West London Orbital were also maximised. Members were also keen to support the proposals as a means of encouraging more active modes of travel and supporting existing as well as attracting new types of business to Neasden Town Centre, alongside the wider environmental and green infrastructure enhancements designed to facilitate Neasden becoming more sustainable as part of the Council's commitment towards tackling current inequalities identified and delivering a cleaner and greener future (with the proposed inclusion of the existing Grange building and facilities also welcomed).

The opportunities available to enhance critical infrastructure and support the delivery of wider regeneration and economic growth were also highlighted alongside the way in which the proposals had also been designed to assist in addressing community safety and tackling gang activity and antisocial behaviour

through the creation of safe, welcoming spaces for people to learn, connect, and grow.

In terms of other comments, support was also expressed for the way in which the proposals had been designed to build on the process of community engagement and civic partnership in seeking to deliver a place-led programme of improvement including new community and workspace areas that would also support the development of a wider package of employment, training, skills and enterprise support as part of an approach towards addressing the circular economy and also wider cultural provision across the area.

In recognising the impact of the legacy created as a result of the historical highway infrastructure interventions on Neasden as a Town Centre and also the impact arising from the pandemic and cost-of-living crisis across the area more widely, members were also keen to recognise the efforts being made through the programme to reestablish the socioeconomic and environmental links between the Town Centre and surrounding communities in a way that would also enhance community cohesion as a means of tackling wider public health inequalities and also provide initiatives to support young people in seeking to engage and better connect with the opportunities available, working in conjunction with local schools and the Young Brent Foundation.

In thanking all those involved for their efforts in developing the programme and once again commending the ambitious nature of the vision and proposals as a means of delivering meaningful change that would enable Neasden to be a safer and more inclusive place as part of the Council's commitment towards regeneration across the borough, Cabinet **RESOLVED**, having noted the exempt information contained within the appendices of the report and also support expressed by other stakeholders including the Mayor for London, Neasden Business Collective & Transport for London:

- (1) To approve up to £7.4m Strategic Community Infrastructure Levy capital funding to deliver public realm and highways infrastructure improvements in and around Neasden Town Centre.
- (2) To note that a range of contracts for consultants and contractors would be required to design, plan and develop the proposed public realm, community programming and highways improvements for the Neasden Civic Partnership Programme.
- (3) To note and endorses the proposed installation of a temporary building for community use on top of the council-owned car park next to 237 Neasden Lane, subject to obtaining any planning permission and other statutory consents.

8. **Quarter 3 Financial Report 2024-25**

Councillor Mili Patel (Deputy Leader and Cabinet Member for Finance & Resources) introduced a report which set out the financial forecast for the General Fund revenue budget, the Housing Revenue Account, the Dedicated Schools Grant and the Capital Programme as at Quarter 3 2024-25.

In introducing the report, Councillor Mili Patel highlighted that the current forecast would be the final update on the Council's financial position in advance of the 2025-26 budget proposals being presented for consideration in February, highlighting that once again, despite the considerable efforts to maintain financial control, the operating environment and wider economic context faced by the Council remained challenging. In seeking to prioritise key statutory services the ongoing impact of austerity was again highlighted and whilst welcoming the new Government's promise of future multi-year funding settlements the need for this to be accompanied by urgent wide ranging reform of Local Government Funding arrangements was also highlighted.

In outlining the challenging financial conditions faced by the Council and recognising the efforts made to innovate, identify efficiencies and generate income members were advised these measures alone would no longer be sufficient over the longer term with the latest forecast predicting an overspend of £17.4m in the General Fund budget. Whilst officers, in seeking to address the pressures identified, had identified in-year savings of £8m members were advised that the potential need to draw down from unallocated reserves therefore remained a concern especially given the ongoing levels of demand and revenue pressures in relation to Housing Needs.

In focussing on these pressures, members noted that the Housing Needs Service in Brent had experienced a 12% increase in the number of homelessness presentations, with Council's across London now spending £4m a day in seeking to address the crisis, and solutions to tackle the scale of the housing emergency becoming increasingly limited. As a result, the government was being urged to increase the funding available to local authorities to cope with the loss in Housing Benefit subsidy to ensure the Local Housing Allowance was truly reflective of the cost of living in London.

Whilst recognising the financial pressures and surge in demand faced by the Council, members also noted the positive outcomes which had been achieved including the delivery of a £1.7m underspend within Neighbourhoods and Regeneration and the contribution through the i4B initiative in generating (on a self-financing basis) annual savings exceeding £4m in terms of cost avoidance relating to Temporary Accommodation costs, with additional proactive efforts in homelessness prevention and relief having also yielded positive results.

Recognising the extent of the significant challenges identified in seeking to manage demand and address the pressures identified, the transparent assessment of the Council's current position was welcomed, with the need for continued financial discipline and careful stewardship highlighted in order to sustain and ensure the Council's financial sustainability.

In considering the report, Cabinet noted the specific updates provided by members in relation to the following areas:

- Children and Young People (CYP) with members advised that the current forecast overspend of £1.3m reflected a shift from the £0.5m underspend reported in Q2, mainly driven by increasing pressure and the unpredictable nature of demand on the placements budget. In terms of other pressures, members noted the £0.9m overspend being reported within Forward Planning,

Performance, and Partnership which reflected the current higher-than-expected level of demand for residential and secure placements and support expressed for the efforts being made to seek better regulation across the sector and address pricing between boroughs with the need for more of these services to be brought within the control of local authorities. Additional overspends of £0.1m were also identified in relation to Business Support (due to staffing pressures) and £0.5m on legal costs and out-of-borough contact services, which it was noted reflected the ongoing costs of legal disbursements related to age assessments for Unaccompanied Asylum-Seeking Children.

Whilst the delivery of underspends in Independent Foster Agency placements had been welcomed (driven by lower client numbers and unit cost reductions) efforts to expand in-house foster car provision and promote independence for care-experienced young people, including access to relevant benefits and sustainable tenancies (being led through the recently established CYP Placement Commissioning Board) were also highlighted as part of the approach in seeking to address pressures identified and improve outcomes for young people. Whilst highlighting ongoing challenges in the recruitment and retention of social workers support was also expressed for the efforts being made to manage and reduce the use of agency workers as well as the proactive efforts being made to address the inflationary pressures from external providers in terms of the provision of fostering and residential accommodation, including delivery of the new children's home designed to increase local placement capacity and reduce reliance on external providers. In recognising the ongoing nature of the demand led risks identified (including the increased level of demand in relation to SEND provision) members welcomed the proactive range of measures identified to monitor and manage these pressures and efforts being made to continue prioritising the delivery of high-quality, wraparound support for children and families across Brent in a fiscally responsible way.

- Partnerships, Housing, and Resident Services with a focus on the financial pressures being experienced as a result of the ongoing demand for housing and housing emergency, with the current forecast projecting an overspend of £12.9m for 2024-25 contributing towards the overall pressure of £15.2m identified within the Housing Needs and Support service. Whilst outlining the proactive measures (including £2.3m of in-year savings achieved through vacancy holds, additional income generation, and the reprioritisation of expenditure) which had been taken in seeking to mitigate against the pressures identified, members recognised the significant extent of the challenges being experienced given the ongoing scale of demand including the increase in homelessness presentations as well as Temporary Accommodation (8%) and emergency placements for families (36%) many of which involved more expensive out of borough arrangements due to the scarcity of local options compounded by the strain on the private rented sector and increase in rent levels.

In seeking to respond strategically to the pressures identified, members noted and welcomed the contribution being made through the i4B initiative towards increasing the available supply of affordable and secure homes aimed at reducing reliance on costly temporary accommodation. In terms of other

initiatives being led through the Directorate, reference was made to the positive impact being delivered through the new Community Wellbeing Programme and refreshed Resident Support Fund designed to provide sustainable and impactful support for local residents alongside the Household Support Fund as a means of assisting residents in financial hardship, which it was hoped the new government would continue supporting given the value this provided as an emergency safety net. In outlining the range of proactive measures being taken to manage the immediate pressures identified, members also recognised the significant nature of ongoing risks including ongoing viability concerns relating to the delivery of housing projects as a result of cost inflation, rising interest rates, and stringent new fire safety regulations and pressures on the Housing Revenue Account (HRA) relating to demand for repairs. Despite the challenges identified, however, members remained keen to highlight the Council's ongoing commitment to ensuring every resident had access to a safe, secure and suitable home and in tackling the housing emergency.

- Community, Health & Wellbeing with the focus once again on the financial pressures being experienced as a result of the growing demand for key services with the current forecast across the Directorate involving a £0.4m pressure, reflecting a change from the £2.1m underspend reported at Q2. This reflected the strain of rising demand, inflationary pressures, and the complexities of delivering care across a sector facing significant workforce and financial challenges and wider need for urgent reform of the social care system. In terms of key challenges, members were advised of the current £1m pressure on Strategic Commissioning and Capacity Building budgets, primarily being driven by a 7% increase in homecare service users since Q2, which had been compounded by a delay in the delivery of savings from the Technology Enabled Care programme, currently in the scoping phase. Whilst noting that Adult Social Care, was still forecast to deliver a £0.9m underspend, this had reduced from the £2.6m previously forecast due to rising costs for residential and dementia placements.

The pressures being experienced in relation to Leisure Services were also highlighted particularly in relation to provision at Bridge Park and Vale Farm, where it was noted fluctuating demand and rising operational costs had contributed to a £0.3m forecast pressure and reflected the current vulnerability of income-dependent services. In recognising the pressures identified, members also acknowledged the significant level of in-year savings due to be delivered (£1.7m) across the Directorate, including those brought forward from 2025-26 and through changes to the charging policy which it was felt reflected the proactive approach being taken in seeking to manage the overall financial position whilst continuing to provide essential services and in recognising the significant nature of risks identified. These were noted to include not only demographic changes in terms of the level and range of complex needs requiring support but also seasonal winter pressures and workforce challenges being experienced across the health and social care sector as a whole. Whilst conscious of the ongoing challenges identified the positive approach being taken towards prevention and targeted intervention was also highlighted alongside the impact of various Public Health funded initiatives including the Supplementary Substance Misuse Treatment and Recovery Grant and the Rough Sleepers Drug and Alcohol Treatment Grant as a means

of ensuring the highest standards of care continued to be delivered for Brent residents.

- Public Realm & Enforcement with the Council's ongoing commitment to keeping the borough, clean green and safe outlined despite the financial challenges already identified. As part of this approach, reference was made to the introduction and monitoring of new contractual arrangements for key services including parking and waste management, with members advised of the specific pressures identified in relation to the new waste management contract as a result of the fluctuation in material prices. Whilst efforts remained ongoing to mitigate these impacts, members were advised the pressures identified had been anticipated with earmarked reserves created to manage such challenges and longer-term performance improvements being introduced to maintain sustainability and ensure the service remained in budget during the current year. This approach had also been supported more widely through initiatives such as the 'Don't Mess with Brent' enforcement scheme with members also welcoming the recent commitment announced by the government of an additional £1.6b for local authorities (including an allocation of £759k for Brent) to address potholes and maintain roads.

As further updates, the ongoing challenges and risks identified in relation to delivery of the Capital Programme were also highlighted due to the complex nature of schemes included and impact of the increase in build costs affecting viability on a number of projects.

In thanking officers and members for the update provided, Cabinet noted the challenges in seeking to manage demand and address the pressures identified, with members noting the work being undertaken through the Budget Assurance Panel in this respect and outlining their continued commitment to working with their relevant Corporate Directors to ensure ongoing oversight and management of budgets in each service area.

As a result of the update provided, Cabinet **RESOLVED**:

- (1) To note the new grant funding received in year, the overall financial position and the actions being taken to manage the issues arising as detailed within the Q3 Financial Forecast.
- (2) To note progress on the savings delivery tracker, as detailed in Appendix A of the report.
- (3) To note the prudential indicators for treasury management, as detailed in in Appendix B of the report.
- (4) To approve the virements set out in section 4.7.13 of the report.

9. **Brent Council's School Admission Arrangements and Schemes of Co-ordination 2026-2027**

Councillor Grahl (Cabinet Member for Children, Young People & Schools) introduced a report outlining the proposed admission arrangements for Brent

Community schools and Schemes of Coordination for 2026-27 (as set out within Appendices 1 & 2 of the report) which required determination and approval by the Admission Authority, in accordance with statutory requirements and timescales.

In considering the report, Cabinet noted the key aim within the proposed admission arrangements and schemes of co-ordination for all maintained schools and academies to ensure that every child in Brent had the opportunity to access high-quality education as a means of establishing the foundation for their future success and wellbeing. In recognising the financial challenges being experienced by many schools in relation to falling pupil numbers and increased demand for SEND provision the establishment of effective admission arrangements was therefore recognised as more than an administrative requirement, with the need for a clear and transparent process regarded as key in ensuring places continued to be allocated in a fair way enabling the needs of young people and their families to be prioritised and addressed.

Officers and schools were thanked for their support to ensure that the approach established enabled children from all backgrounds across the borough to have access to local schools, supporting community cohesion and providing a stable environment for families, with the Scheme of Coordination outlined in the report also highlighted as an essential part of the admissions process in terms of providing clarity and structure and in maintaining work being undertaken across maintained schools and academies to ensure that children could transition smoothly and equitably into educational provision.

In noting the importance in terms of the forward planning for provision of school places across the borough, given the need to balance demand for school places with the availability of high-quality provision, across the family of schools in Brent, members also recognised the way in which the proposed arrangements would also support provisions within the Children's Wellbeing and Schools Bill relating to school places in a way that would also provide certainty for schools, assisting them to plan ahead and continue delivering the best possible education for young people across the borough.

In welcoming the transparent nature of the arrangements, given the importance and impact of the school admission process on families and young people, members commended what they felt to be the thorough and fair nature of the proposals outlined in relation to maintained schools and academies across the borough.

In support of the transparent nature of the approach outlined, Cabinet therefore **RESOLVED:**

- (1) To agree ("determine") the proposed admission arrangements for Brent community schools and schemes of co-ordination for all maintained schools and academies in Brent for the 2026/2027 academic year, as detailed within Appendices 1 and 2 of the report.
- (2) To note the scheme of co-ordination which would be in place for the 2026-2027 offer year for co-ordinated applications to start school in years Reception, 3, 7 and 10.

10. Exclusion of Press and Public


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

11. **Any other urgent business**

There were no items of urgent business.

The meeting ended at 11.07 am

COUNCILLOR MUHAMMED BUTT
Chair

 Brent	Cabinet 10 February 2025
	Report from the Corporate Director of Partnerships, Housing and Resident Services
	Lead Member – Cabinet Member for Housing & Resident Services (Councillor Fleur Donnelly-Jackson)
Review of working age Council Tax Support Scheme for 2025/26	

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:	Seven Appendix A: Impact and cost savings with income bands Appendix B: Impact and cost savings with changes to non-dependant deductions Appendix C: Equality Impact Assessment Appendix D: Scenarios Appendix E (Part 1): Consultation Report Appendix E (Part 2): Consultation Responses Appendix E (Part 3): Consultation Comments Appendix F: Greater London Authority Response Appendix G: Citizens Advice Brent Response
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Thomas Cattermole- Director of Resident Services 020 8937 5446 Thomas.Cattermole@brent.gov.uk Asha Vyas – Head of Customer Services & Assessments 0208 937 2705 Asha.Vyas@brent.gov.uk

1. Executive Summary

- 1.1. Cabinet is being asked to consider the revised Local Council Tax Support (CTS) scheme 2025-26 and recommend the following proposed changes to Full Council on 27 February 2025.

- Introduce a standard 35% minimum payment for working age households and apply a percentage reduction to each of the income bands.
 - Simplify the non-dependant charges and have two flat rate non-dependant deductions for most households with other adults living in the property, £8 per week for non-dependants “out of work” and £20 per week for non-dependants “in work”.
 - To align the backdating rules for new CTS claims with the Housing Benefits and Universal Credit regulations i.e. for a maximum of one calendar month. Under exceptional circumstances the Council will reconsider the start date of the CTS claim.
 - Update the income bands for customers and non-dependants depending on the Consumer Pricing Index (CPI) from September of the previous year.
 - Amend CTS scheme to include the Universal Credit notification received from DWP for Council tax, as start date of claim for Council tax reduction if there is entitlement to it.
 - Consider the review and update the section 13A policy for hardship fund for Council tax with the additional funds of £1.5m at a future Cabinet in March 2025
- 1.2. The other option that was put to members was to ‘do nothing’ – No changes are made to the existing scheme. This option would mean the Council will need to identify £5m of savings elsewhere within the 2025/26 budget. At this point in the budget setting process if no alternative savings can be identified, it is proposed to use £5m of reserves to cover the budget shortfall in 2025/26. As reserves can only be used once, £5m will have to be added to the budget gap in the Medium-Term Financial Strategy and 2026/27 budget setting process. This is referenced in the Budget and Council Tax 2025/26 report, also on this Cabinet agenda (Agenda Item 8).
- 1.3. This follows agreement by Cabinet in October 2024 to consult residents on proposed amendments to the scheme.
- 1.4. The findings and outcomes of the consultation arrangements for the proposed scheme were carried out over an 8-week period between 21 October and 15 December 2024 and are included within this report.
- 1.5. To note that Cabinet will recommend that the authority is to be delegated to the Corporate Director of Resources and Finance for yearly changes of income bands in line with CPI and any other changes recommended at General Purposes Committee for Council tax and Council Tax Support in consultation with the relevant lead member.

2.0 Recommendation(s)

- 2.1 That Cabinet approve and recommend the following changes to be considered at Full Council on 27 February 2025.
- (a) That the revised Local Council Tax Support Scheme for 2025-26 incorporate the following changes: introduce a standard 35% minimum payment for working age

households and apply a percentage reduction to each of the income bands. This means all CTS claimants will be expected to contribute a minimum of 35% towards their Council Tax liability. Their CTS will then be calculated based on their income and this will determine which income band they fall into. This would reduce the cost of the scheme by £7.6m. Detailed explanations and calculations, number of residents impacted and the proposed weekly reduction in CTS are shown in **Appendix A**.

- (b) Simplification of the non-dependant charges and have two flat rate non-dependant deductions for most households with other adults living in the property, £8 per week for non-dependants “out of work” and £20 per week for non-dependants “in work”. This would remove the need to verify income for non-dependants for CTS claims and reduce the administrative burden. Adopting this proposal would reduce the cost of the scheme by £0.7m. Detailed explanation and calculations of the proposed non-dependant deduction, number of households affected and proposed weekly reduction in CTS support are shown on **Appendix B**.

Technical and administrative changes

- (c) To note that the amendments to CTS scheme will include the Universal Credit notification received from DWP for Council tax, as start date of claim for Council tax reduction if there is entitlement to it.
- (d) To note the alignment of the backdating rules for new CTS claim with the Housing Benefits and Universal Credit regulations i.e. for a maximum of one calendar month. The backdating request is made at the time of submission of a new claim. This change will reduce the administrative burden, and customers will not lose out as we will accept the start date as per DWP notification date to start date of entitlement. In exceptional circumstances, the Council will consider revising the claim for more than a month e.g. bereavement of close relative.
- (e) To note that the income bands for households is reviewed every year in line with the Consumer Pricing Index (CPI) from September of previous year to be considered for the new financial year.
- (f) To note that a review and update of section 13A policy for hardship fund for Council tax, including an additional £1.5m fund to support residents, will be considered in March 2025’s Cabinet meeting.

3.0 Cabinet Member Foreword

- 3.1 As we navigate the ongoing challenges of delivering essential services amidst rising costs and growing financial pressures, Brent Council continues its commitment to supporting our most vulnerable residents while ensuring that everyone contributes fairly to the funding of our community. The Council Tax Support (CTS) Scheme, which provides financial relief for many, faces growing costs with a forecasted increase to £21.2 million in 2025-26 for working age.
- 3.2 This year, we are agreeing to the changes to the working-age CTS Scheme that will not only alleviate the administrative burdens but also deliver significant

cost savings for the Council. This will allow us to provide significant support for vital services elsewhere in the Council. We have consulted residents and key stakeholders on the proposed changes. Officers have completed the Equalities Impact Assessment, the outcome of the consultation and responded to all enquiries.

- 3.3 These changes reflect our broader priorities as a borough: ensuring financial sustainability, targeting support where it is needed most, and fostering a sense of collective responsibility. While pensioners remain protected by national schemes, the changes for the working-age population include designing the scheme with a standard 35% minimum payment and simplified non-dependant charges. The changes will save up to £8 million, of which £1.5 million will be reinvested into a hardship fund for those in the greatest need.

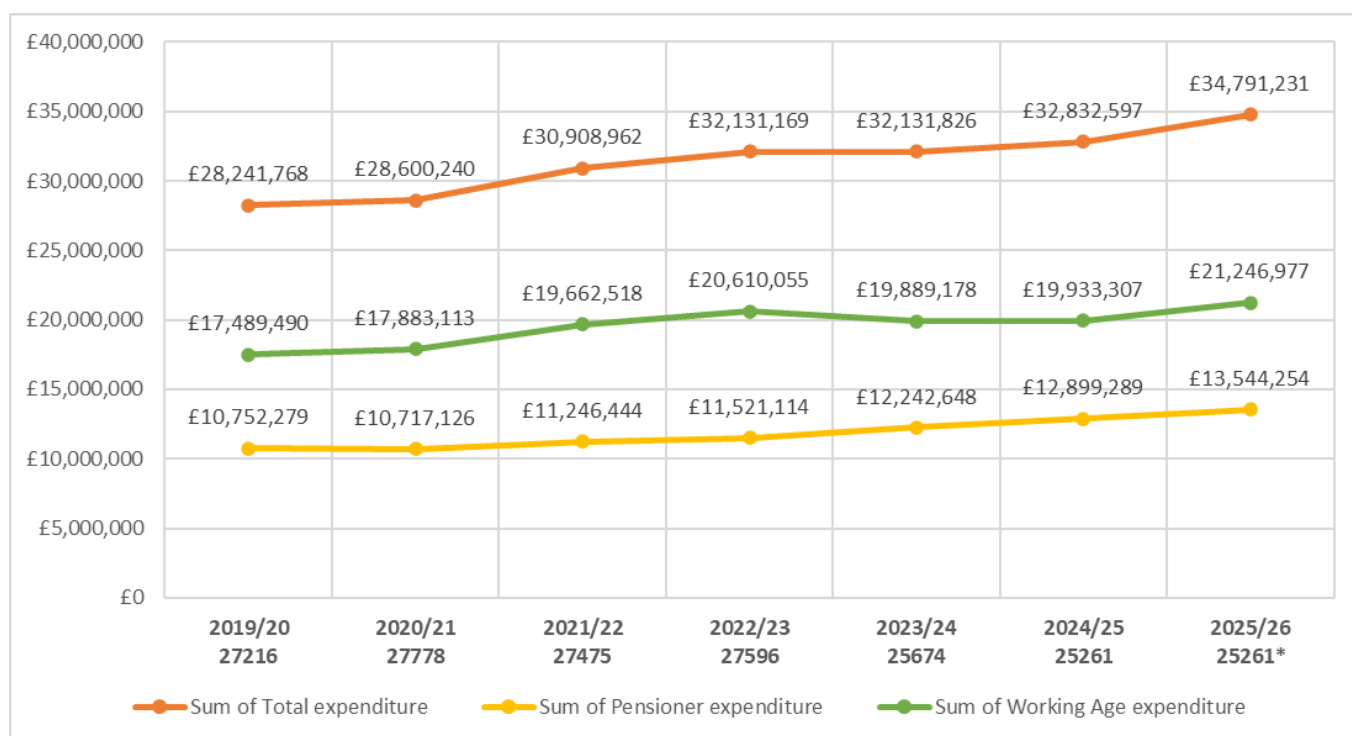
4.0 **Background**

- 4.1 As part of the 2010 Spending Review, the Government announced its intention to localise support for Council Tax from 2013 onwards and reduce expenditure by 10%. This would replace Council Tax Benefit, a nationally funded scheme which allowed households in receipt of out of work benefits to receive 100% council tax benefit and therefore not have to pay council tax. The Local Government Finance Act 2012 introduced Council Tax Support. Since this time, Council funding levels have reduced by a third and at the same time the total cost of the scheme has grown to £32.8m (estimated in 2024-25).
- 4.2 This means that unlike other universal benefits which are funded by Central Government, CTS is financed by local authorities, through a combination of council tax, business rates and the balance of the original government grant. The delays in reviewing the way authorities are funded, called the Fair Funding Review, means that funding levels do not reflect the current population demographic needs.
- 4.3 CTS is awarded as a reduction against council taxpayer's gross liability, like a discount or exemption, so the customer pays less. The scheme has two parts, a statutory scheme for pensioners and a non-statutory scheme that covers the working age population. These proposals impact on the non-statutory element of the scheme.
- 4.4 Following Cabinet approval, Brent moved to a CTS income banding scheme from April 2020, whereby the level of support provided to a household is assessed based on weekly income against a series of income bands.
- 4.5 Currently, the amount of CTS awarded for 2024-25 totals £32.8m, paid to 16,833 working-age and 8,428 pension-age claimants. (Total caseload 25,261).
- 4.6 The cost of the current CTS scheme is not financially sustainable. Brent faces a significant challenge setting the budget for 2025/26 with a budget gap of c£16m, rising to c£30m by 2027/28. This is to be addressed through identifying further savings, efficiencies, and income generation options. The changes will provide an option for Cabinet in addressing this budget gap.

5.0 Review of the current trends in CTS claims

- 5.1 The cost of the CTS scheme for 2025-26 is forecast to be £34.8m of which £21.2m relates to the working age claimants.
- 5.2 The working age caseload has continued to steadily drop since 2023-24 whilst the pension age caseload has remained by largely static.
- 5.3 The table below shows that, based on the current caseload of 25261 and Council tax charge for 2025-26, if no changes are implemented it is projected that the scheme costs would rise to above £34.7m in the financial year 2025-26.

Caseload	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Pensionable	8,788	8,578	8,547	8,488	8,482	8,428
Working Age	18,428	19,200	18,928	19,108	17,192	16,833
Total Caseload	27,216	27,778	27,475	27,596	25,674	25,261
Total Expenditure	£28,241,768	£28,600,239	£30,908,961	£32,131,169	£32,131,826	£32,832,596



- 5.4 Cabinet is asked to note that the recommended changes to the discretionary council tax support scheme will bring the overall scheme costs closer to the London average of £22m. The second chart below shows Brent Council Tax

Support spend compared to London boroughs it shows an average cost of around £22m for council tax support among London boroughs for 2022-23.

6.0 Council tax Support Scheme - Number of Claimants and average costs in London as at spring 2024

6.1 Almost all Councils' current CTS schemes are variations on the former CTB scheme and income banding scheme, with the most widely adopted variation being the "minimum contribution". Contributory amounts currently range from 0% to 50% in London.

6.2 We are aware that four other boroughs are in the process of reviewing the CTS schemes for 2025-26 and the range of minimum charge currently forecasted is 20% and 50%.

Borough	Working Age Caseload	Pensioner Caseload	Total Caseload	Working Age Cost	Pensioner Cost	Total Cost
Islington (I)	17994	7021	25015	25.606	10.803	36.409
Tower Hamlets (I)	20371	7366	27737	23.362	8.934	32.296
Haringey	18288	7816	26104	22.921	11.793	34.714
Croydon	18834	7935	26769	22.615	13.264	35.879
Camden (I)	15336	6900	22236	21.701	11.314	33.015
Hackney (I)	18182	8629	26811	20.834	11.511	32.345
Brent	17065	8492	25557	20.216	12.965	33.181
Ealing	15602	7991	23593	19.918	12.186	32.104
Lambeth (I)	15117	8269	23386	18.877	10.807	29.684
Greenwich (I)	15110	6705	21815	17.811	7.94	25.751
Newham	18252	8017	26269	17.166	9.329	26.495
Hounslow	15680	5824	21504	16.222	8.413	24.635
Barnet	19692	7430	27122	16.022	11.138	27.16
Southwark (I)	15320	8243	23563	15.452	10.029	25.481
Enfield	28523	7642	36165	14.825	11.998	26.823
Lewisham (I)	12851	6837	19688	11.941	7.925	19.866
Waltham Forest	9085	5551	14636	11.263	8.156	19.419
Barking & Dagenham	10752	4479	15231	11.013	5.42	16.433
Redbridge	10042	5177	15219	10.354	8.063	18.417
Sutton	8028	3376	11404	9.661	4.955	14.616
Hillingdon	8462	4933	13395	9.421	7.124	16.545
Bexley	8836	4358	13194	9.29	6.093	15.383
Havering	8607	4997	13604	8.965	6.797	15.762
Kingston	5229	2437	7666	8.649	4.328	12.977
Merton	6627	3268	9895	8.509	5.72	14.229
Richmond	5031	2958	7989	8.08	5.119	13.199
Kensington & Chelsea (I)	7000	4497	11497	7.898	5.486	13.384

6.3 For context, the chart above shows the council tax support caseloads for the working-age and pensioner schemes in Brent and London boroughs for the 2024-25 financial year. The data shows that Brent has one of the highest averages of working-age council tax support caseload and costs. Making the recommended changes will mean Brent's overall expenditure is likely to be in the median across London.

6.4 The total reduction in the proposed CTS scheme is £8.3m and the contribution towards the Council's budget gap is £5m net. This is, in part, because the CTS scheme applies to funds collected by the Council on behalf of Greater London Authority (£1.5m). In addition, the Council has prudently estimated that the collection rate for those impacted by the change may be lower. There is a commitment of an additional £1.5m to mitigate the impact of these proposals by increasing the existing Section 13A discretionary hardship scheme. Additional temporary staffing resource will be required to collect the additional income, respond to customer queries, and provide access to the Welfare Debt Advice Service.

7.0 Pension age claims

7.1 Pensioners (of state pensionable age) will not be impacted by the proposed changes. Pensioners are protected as CTS is still controlled nationally for this age group and can cover up to 100% of their CTS bill depending on the circumstances of the resident. Therefore, CTS for Pensioners is outside of the scope of this consultation.

8.0 New Scheme Principles

8.1 The proposed 2025/26 scheme will be based on the principles below:

- Ensuring everyone in a household makes a fair contribution towards funding local services via Council Tax, thereby ensuring everyone has a stake in the borough.
- Universal – Asking all those in receipt of working-age CTS to pay a contribution.
- Reduced administration costs by removing the need to request payslips or income information for non-dependants.
- Minimal changes and easy to understand.
- Increasing financial support through income maximisation, welfare, and financial support

8.2 The Council proposes to review the caseload and expenditure every year.

9.0 Rationale for change to the scheme

9.1 Following the Equalities Impact Assessment and outcome of the consultation; the changes to the 2025-26 CTS scheme will contribute towards the budget gap facing the Council, to ensure that the Council remains financially resilient.

9.2 One proposed change is to simplify the non-dependant charges and have two flat rates, setting fixed weekly amount £8 per week 'out of work' and £20 per week for non-dependant 'in work'. This change offers significant benefits for households in reporting non dependant circumstances and will streamline the assessment process reducing the administrative burden for the Council.

9.3 The introduction of limiting backdating for new CTS claims to one month brings the backdating rules in line with existing regulations for Housing Benefits and

Universal Credit regulations. This change will ensure consistency across different types of financial support, simplifying the process for residents and making it easier for them to understand their entitlements.

9.4 The introduction of using the Universal Credit (UC) notification date from Department for Work and Pensions (DWP) as the start date for CTS entitlement simplifies the process for households and ensures they receive support promptly and fairly.

9.5 The amendment to adjust income bands for households, based on the CPI from September of the previous year, ensures the CTS scheme remains fair, responsive, and reflective of economic realities.

10.0 **Proposed Scheme options considered:**

10.1 At the outset of the CTS review, the scheme was identified as being a potential area from which savings could be made efficiently. Several options were modelled during the design phase in order to provide up to £5m net savings. If the amendments to the Council Tax Support scheme are not approved by Full Council, the budget for 2025-26 will not be a legally balanced budget and will therefore propose to use £5m of reserves to cover the budget shortfall in 2025-26. As reserves can only be used once, £5m will have to be added to the budget gap in the Medium-Term Financial Strategy and 2026-27 budget setting process.

10.2 A range of other options to amend the CTS scheme have been considered. The other options were:

- Minimum CTS award ranging from 20% to 65%.
- Maximum CTS to be capped to Band D
- Change the income bands.
- Apply a cap on a minimum award of CTS of £2/£5 per week.

10.3 The above options for various reasons were not viable as it would not give us the necessary savings needed, administratively this would not be efficient, and the number of households impacted by the proposed changes would be significantly higher.

10.4 As part of the initial modelling undertaken prior to the consultation, consideration was also given to adopting different levels of minimum payments, of 30%, 40% and 55%. However, the preferred options, which was put out to consultation, was to consult on 35% minimum payment. This was because the budget gap facing the Council is significant. Given the scale of the budget challenge, the Council's preferred option was to consult on the proposal which resulted in the saving level needed.

10.5 Consideration has been given to safeguarding vulnerable households, particularly disabled individuals who previously received the maximum award of 100%. However, given the scale of the budget gap faced by the Council, it is not feasible to provide additional universal protection for this group. Instead of

implementing a blanket approach, financial assistance will be offered through Section 13A Discretionary Hardship Fund, which has been allocated an additional £1.5m to support these households. This scheme will assess each claim based on individual household circumstances, considering factors such as income and outgoings. This approach ensures both proactive and reactive support for those most in need, providing a fair and responsive solution within the constraints of the budget.

11.0 **Proposals to amend the Council Tax Support scheme in 2025/26.**

11.1 The six proposals for the revised Scheme for 2025/26 are as follows:

- Introduce a standard 35% minimum payment for working age households and apply a percentage reduction to each of the income bands.
- Simplify the non-dependant charges and have two flat rate non-dependant deductions for most households with other adults living in the property, £8 per week for non-dependants “out of work” and £20 per week for non-dependants “in work”.
- To align the backdating rules for new CTS claim with the Housing Benefits and Universal Credit regulations i.e. for a maximum of one calendar month.
- Review and update the section 13A policy for hardship fund for Council tax with the additional funds of £1.5m
- Update the income bands for customers and non-dependant depending on the Consumer Pricing Index (CPI) from September of the previous year.
- Amend CTS scheme to include the Universal Credit notification received from DWP for Council tax, as the start date of claim for Council tax reduction if there is entitlement to it.

11.2 Anyone who is liable for Council Tax (tenants and homeowners) can apply for council tax support. An Application for Housing Benefit or Universal Credit can be used as a claim for council tax support, or a separate council tax support application can also be completed. Generally, low-income households (including those that work) will be entitled to some level of support towards their council tax, this depends on the individual circumstances.

11.3 The amount of council tax support in a council tax bill depends on:

11.3.1 The local council tax support scheme

11.3.2 Household type – working age (subject to the local scheme agreed) or pension age (subject to prescribed government regulations which must be adhered to)

11.3.3 Household circumstances (for example single, part of a couple, number of children the household receives child benefit for, residency status)

11.3.4 Household income - this includes savings, pensions, benefits and earnings for claimant and partner.

Further information on those aspects which must be followed in all schemes can be found in the Council Tax Reduction Schemes (Prescribed Requirements) (England) Regulations 2012 (and subsequent amendments).

12.0 Summary of Changes

12.1 The table below summarises the main changes proposed, how they work in our current scheme and who would be affected by these changes:

Scheme Element	Current Scheme (2024/25)	Proposed Scheme (2025/26)	Who is affected
Income Band Weekly income of £0-80	Up to a 100% council tax bill reduction is available to these claimants	Up to a 65% council tax bill reduction would be available to these claimants	12402 households currently within this income band. All households would be affected by the proposed changes. This has also been referred to as a minimum contribution as these claimants would go from paying 0% to 35% of their council tax liability.
Income Band Weekly income of £80-110	Up to an 80% council tax bill reduction is available to these claimants	Up to a 50% council tax bill reduction would be available to these claimants	532 households currently within this income band These households would be affected by the proposed changes.
Income Band Weekly income of £110-150	Up to a 50% council tax bill reduction is available to these claimants	Up to a 30% council tax bill reduction would be available to these claimants	Nine hundred households currently within this income band These households would be affected by the proposed changes.
Income Band Weekly income of £150-250	Up to a 30% council tax bill reduction is available to these claimants	Up to a 20% council tax bill reduction would be available to these claimants	2999 households currently within this income band. These households would be affected by the proposed changes.
Non-dependant Deductions	Non-dependant deduction amount is based on the level of income received by the non-dependant and which income	Non-dependant deduction amount would be based on whether a non-dependant is 'in work' or 'out of work.'	3165 households currently have at least one non-dependant living with them. These households would be affected by the proposed changes.

	<p>band they fall into.</p> <p>Minimum of £5 deduction per week for non-dependants not working & maximum of £20 deduction per week for those earning over £200 per week.</p>	<p>Minimum of £8 deduction per week for non-dependants not working & maximum of £20 deduction per week for those working.</p>	
<p>Universal Credit notifications to be treated as new CTS applications</p>	<p>Residents claiming Universal Credit must make a separate application to us to apply for CTS.</p>	<p>Automatically consider notifications received by DWP as applications for Council Tax Support. Thus, removing the need for most working age people to make a separate claim for CTS where they have been awarded Universal Credit.</p> <p>As a result of this change there should equally be less application of backdating rules as most working-age customers will not need to make a separate claim which can cause delays.</p>	<p>All working age residents of Brent that will have an award to Universal Credit and have a Council tax liability.</p>
<p>Backdating rules</p>	<p>Able to backdate claims up to the beginning of the financial year where the claimant is in receipt of Universal Credit</p>	<p>Maximum backdating period allowed would be one month where the customer is in receipt of Universal Credit or can show good cause as to why they have not applied sooner.</p>	<p>All new working age residents applying for Council Tax Support may see a reduction in the amount of support they receive if they are unable to claim on time.</p>
<p>CPI linking Income Bands</p>	<p>Income band amounts are fixed and not linked to CPI.</p>	<p>Set the level of income (within the income bands) to qualify for support</p>	<p>All households currently receiving working-age Council Tax Support (Approximately 16833) and future applicants</p>

		for customers in line with the CPI from September of the previous year.	that may qualify due to higher income bands. A higher likelihood that the value of the scheme to residents is maintained where household income increases.
CPI linking Non-dependant deductions	Non-dependant deduction amounts are fixed and not linked to CPI.	Set the non-dependant charges from 1 April each year in line with the CPI from September of the previous year.	3165 households currently have at least one non-dependant living with them. All households would be affected by the proposed changes.
Section 13A	Current policy allows for an award to be granted where there is evidence of “financial hardship or personal circumstances that justifies a reduction in council tax liability”	Review and update section 13A policy for hardship fund for Council tax to ensure that households who face difficulty may be supported. Additional funding of £1.5m to further support residents under the Section 13A Discretionary Policy, where justified this will mean reducing residents’ council tax liability to zero.	Brent residents experiencing financial difficulty because of their Council Tax bill provided they meet the requirements set out within Section 13A policy would be allowed to make an application for a Section 13A award.

13.0 Impact of the proposals on households

13.1 The impact of these proposals on households across Brent vary significantly, and financial and personal circumstances change frequently, so it is not possible to provide details of the impact for all claimants in 2025/26. All working age households will be impacted by the change. The charts below show the number of CTS claims and a projected estimate of financial loss on the weekly council tax due. The data shows the expected impact of the changes on households by age, council tax band and households’ type. The Equality Impact Assessment (**Appendix C**) provides further details on expected impact on households.

13.2 The impact on Council Tax Support entitlement by age group is demonstrated as per the table below:

Age of Customer	Number	% of Total	Additional to pay per week (average)
18 to 25	490	2.91%	£7.94
26 to 35	2531	15.04%	£7.83
36 to 45	4144	24.62%	£8.33
46 to 55	4701	27.93%	£9.36
56+*	4967	29.51%	£10.43
Grand Total	16833	100%	£9.15

**Majority of claimants above the age of fifty-six tend to live in higher banded properties.*

13.3 The impact on Council Tax Support entitlement by Council Tax Band is demonstrated as per table below:

Council Tax Band	Number	% of Total	CTS current Scheme	CTS proposed Scheme	Additional to pay per week (average)
A	1483	8.81%	£17.48	£11.31	£6.17
B	2884	17.13%	£20.39	£12.91	£7.49
C	6656	39.54%	£22.21	£13.64	£8.57
D	4030	23.94%	£24.20	£13.78	£10.42
E	1494	8.88%	£28.48	£15.26	£13.22
F	241	1.43%	£33.17	£17.58	£15.59
G	45	0.27%	£37.17	£20.80	£16.37
Grand Total	16833	100.00%	£22.71	£13.56	-£9.15

13.4 The impact on Council Tax Support entitlement by household type is demonstrated as per table below:

Household Type	Number	% of Total	CTS current Scheme	CTS proposed Scheme	Additional to pay per week (average)
Single	8409	49.96%	£22.77	£13.67	-£9.10
Lone Parent Family	4780	28.40%	£22.19	£13.43	-£8.76
Couple	924	5.49%	£26.40	£14.34	-£12.06
Two Parent family	2720	16.16%	£22.20	£13.21	-£8.98
Grand Total	16833	100.00%	£22.71	£13.56	-£9.15

Examples showing the impact on different household types can be found in Appendix D

13.5 On average across all claims, resident will be expected to pay £9.15 (estimated) more a week towards their council tax bill.

13.6 The breakdown of working age CTS scheme by ethnicity is demonstrated as per table below:

Ethnicity	Number	% of Total
White	2272	32.45%
Black or Black British	2067	29.52%
Asian or Asian British	1225	17.50%
Arab	762	10.88%
Mixed Background	430	6.14%
Any Other Ethnicity	205	2.92%
Prefer not to say	41	0.59%

13.7 The breakdown of working age CTS customer by gender is demonstrated as per table below:

Gender of Customer	Number	% of Total
Female	9416	55.94%
Male	7195	42.74%
Unknown	222	1.32%
Total	16833	100%

- 13.8 **Pensioners (66 years and above).** The proposed scheme changes have no impact on the pensioner scheme as it is a national statutory scheme of 100% support for CTS.
- 13.9 The modelling above is based on caseloads, household income details, and the Council Tax billing values in Spring 2024. Therefore, this modelling excludes the impact of the proposed increase in Council Tax of 4.99% and the GLA increase in Council Tax and changes in caseloads and income levels of residents.
- 14.0 **How the Council will seek to mitigate the impact of these proposals**
- 14.1 The specific measures that will be implemented to mitigate the impact of the change in scheme include:
- 14.2 For the purposes of Council Tax Support, households would be treated as receiving £0.00 income per week as all income from DWP or HMRC benefits is disregarded. Both groups of households will be asked to pay the same Council Tax under the new scheme proposals; although the person with disability benefits has greater income levels (to support their needs) this income is not considered.
- 14.3 Disability benefits and disability related premiums will continue to be disregarded in the Council Tax Support calculation. This is particularly relevant to those who are currently protected due to being in receipt of disability benefits and/or carers allowance. This ensures that those currently protected and losing their protection, continue to have a higher income than those not protected, to reflect their additional disability related costs.
- 14.4 The following examples show the difference in income between a single person with disability benefits and a single person who does not have disability benefits:
- Example 1 - Single person protected in 23/24 with disability benefits.**
- Income per week in 24/25 will be £280.55/wk., made up of £108.55 personal independent payments disregarded £172.00 Universal Credit calculated from (£81.50 Severe disability premium + £90.50 applicable amount as over 25 years old)
- Example 2 - Single person not protected with no disability benefits.**
- Income per week in 24/25 will be £90.50/wk., made up of £90.50/wk. Universal Credit will be calculated from the £90.50 applicable amount as they are over 25 years old.
- 14.5 As part of wider mitigations, the Council will promote and apply alternative applicable council tax regulations, where reductions are based on circumstances that are not financial but based on non-financial circumstances e.g., disabled relief (based on adaptations to the property that can reduce the

council tax liability to the equivalent to one band lower) and severely mentally impaired exemptions (based on doctor's certification and the award of appropriate disability benefits). These are sometimes not claimed where Council Tax Support based on financial circumstances are claimed so these options may now become more beneficial to mitigate the impact in the reduced support. The Council will proactively identify and contact households to ensure that they are aware of these potential reliefs in advance of the proposed scheme being implemented.

14.6 In terms of further mitigations, if anyone affected by the changes is struggling to afford the increase in their Council Tax charge, they would be able to approach the Council for financial assistance. The Council proposes to set aside £1.5m to further support residents under the Section 13A Discretionary Policy, where justified this will mean reducing residents' council tax charge.

14.7 The Council will enhance their offer with Welfare Advice through our Community Hubs, Libraries and Family Well-being Centres providing residents with comprehensive financial support, including debt management and budgeting guidance. Residents seeking help will receive appropriate advice and financial support aimed at preventing further debt with Credit Union and Citizen Advice Brent.

15.0 **Affordability for Brent households**

15.1 The Council has considered the affordability for impacted council tax support households, and particularly those previously protected groups where the protection is to be removed under the 2025-26 scheme. The Council does not hold details of household outgoings for the 16833 impacted households and so it is not possible to assess the affordability of the impact on all 16833 households.

15.2 The aim of these changes is for all households to contribute towards the Council services that residents in the borough benefit from. However, it is recognised that where a resident is unable to work because of their disability they may face a particularly significant impact, as they may have higher disability related costs and will not have the ability to increase their income. The Council Tax Support scheme seeks to reduce this impact, by disregarding all income from DWP or HMRC benefits in the Council Tax Support calculation. This includes disability related benefits, disability premiums, carer's allowance and much more.

15.3 If an individual household is experiencing significant financial hardship because of the increase in council tax the Council will support that household via the Section 13A Discretionary Hardship scheme and benefit advice to maximise income.

15.4 The increase in council tax Section 13A Discretionary Hardship scheme of £1.5m is aimed to mitigate the impact of the proposed changes.

16.0 **The Consultation Process**

- 16.1 A wide variety of methods were used as part of the Consultation process with the aim of ensuring the approach was inclusive of all groups. This included all claimants in receipt of CTS and all other relevant stakeholders, with the goal of gathering a range of viewpoints.
- 16.2 All households currently in receipt of Council Tax Support were made aware of how the change might impact their household either via email or letter. This also included a link to the consultation webpage where face to face drop-in sessions were advertised to offer support and advice. On this webpage residents could also find an FAQ document detailing where they could get support, e.g. contacting Brent Council directly or a relevant voluntary sector organisations such as Citizens Advice Brent.
- 16.3 The Council followed best practice guidelines by undertaking an eight-week public and stakeholder consultation, between 21 October 2024 and 15 December 2024. Consultation activities included: -
- Questionnaire on Council website and consultation portal was promoted for all households and stakeholders.
 - Emails and letters to all households who receive CTS.
 - Direct engagement by email and letter with all partners and CAB with offer to attend dedicated meetings with each organisation.
 - Direct engagement by email and letter with partners with offer to attend dedicated meetings with each organisation.
 - Drop-in sessions (in all 6 Libraries across the borough)
 - Banners in Customer Service Centre and at events.
 - Leaflets
 - Stakeholder forums to obtain feedback and input from voluntary sector and community organisations.
 - Mailbox set up for CTS-related comments and queries.
 - Promoting consultation via auto reply message for Council Tax & CTS emails
 - Direct engagement through all Brent Connect meetings.
 - Consultation published in the voluntary sector newsletter.
 - Consultation with Adult Social Care Community Event
 - Consultation with Disability Forum
 - Face to face engagement in the Customer Service Centre
 - Consultation with Schools through the School Business Managers by the School Effectiveness and Standards Service
 - Staff engagement
 - Elected Members briefing sessions.

17.0 **Consultation with Key Stakeholders**

- 17.1 Emails/letters with the proposed changes and consultation documents link were sent to 16,833 customers and the Greater London Authority (GLA), Citizen Advice, internal and external partners, schools as well as to all Members and major advice agencies. Banners and leaflets placed in Libraries across the borough and the Civic Centre. Consultation was published in the newsletters

by the voluntary sector. Emails sent to all Brent Hub Partners including Citizen Advice Brent (CAB), offering briefing sessions to explain changes. Presentation on proposed changes were present at the Brent Connect meeting. Officers attended a disability event, leaflets on consultation were distributed at an Islamophobia awareness event. Customer contact via email for Council Tax and Council Tax Support services received an auto-reply message referring them to the consultation.

18.0 Consultation Response Summary

18.1 Overall, there were 397 responses to the consultation. Of these, 176 were from households currently receiving Council Tax Support (CTS). Additionally, there were two responses from organizations: one from the Greater London Authority and one from the Citizens Advice Brent.

18.2 This is the highest response rate compared to all London LA's who are either currently consulting or consulted last financial year. The response rate is also higher than the previous CTS consultation which was undertaken in 2019 where we had received only 194 responses.

18.3 The results of the consultation can be viewed in **Appendix E** which displays the responses to the questionnaire from residents and a summary of the responses from the Greater London Authority (GLA) and Citizens Advice Brent

19.0 Greater London Authority Response

19.1 A more detailed summary of the feedback received from the GLA is contained in **Appendix F**. The GLA acknowledges that local authorities face difficult choices on CTS schemes considering their challenging financial circumstances. This is particularly acute in London boroughs like Brent which are seeing rapid population growth leading to core pressures on services and rising costs in areas such as temporary accommodation due to rising rents and pressures on the supply of housing. The GLA acknowledged that Council funding has not been updated to reflect current need.

20.0 Citizens Advice Brent Response

20.1 Citizens Advice conducted a flash survey of thirty-two working age Brent Residents in receipt of CTS. A summary of their response is outlined below, with the full response detailed in **Appendix G**.

20.2 The findings highlight the ongoing financial challenges faced by many Councils Tax Support (CTS) claimants, emphasising the need for adjustments to better assist vulnerable residents while acknowledging the Council's commitment to addressing these issues.

20.3 Key Findings:

- The average council tax bill increase for surveyed CTS claimants was £524.98.

- Out of thirty-two claimants reported not having enough income to cover their monthly costs, even with maximum CTS support.
- Two-thirds of those surveyed will receive new or higher council tax bills they currently lack the monthly income to pay.
- Lower the Minimum Payment: Reducing the current 35% minimum council tax payment, one of the highest in the UK, would help alleviate financial pressure on residents.
- Recognise Financial Vulnerability: Eligibility for CTS already indicates financial hardship and should be considered before enforcement actions are taken.
- Expand Discretionary Support: Making greater use of the Council Tax Discretionary Reduction Policy could offer critical relief to those most in need.
- Enhance Awareness of Support: The council could further refine and promote available support options for residents struggling with council tax bills.
- Maintain Flexible Backdating Rules: Retaining the current backdating policy, which allows claims to be backdated to the start of the financial year for valid reasons, would ensure continued support for vulnerable residents.

21.0 Stakeholder and ward member consultation and engagement

21.1 Members briefings and discussion with lead member were on-going throughout the process. Initially, the Member briefings presented details of current scheme, the various options and workings to achieve the savings, with the option of doing nothing and finding the savings elsewhere. Further Member briefings, to run through the consultation documents and process was conducted. The proposed changes and consultation were also part of budget scrutiny. The Cabinet member has been updated at every stage including the Equalities Impact Assessment and the outcome report.

22.0 Financial Considerations

22.1 An update to the Medium-Term Financial Strategy was taken to Cabinet in November 2024 as part of the draft 2025-26 budget, which set out the medium-term risks and uncertainties with regards to the current financial position. These primarily relate to exceptional factors such as high levels of inflation, high interest rates, increased demand for key services and uncertainty in government funding. The Council must therefore continue to assess all aspects of its expenditure in order to maintain its financial resilience and sustainability. Since 2019-20, the overall cost of CTS has grown significantly by £4.5m. The proposed changes, while addressing the need to update the eligibility criteria, also take account of the overall cost trajectory within the overall budget envelope.

22.2 The budget gap for 2025-26 is £16m and savings have been put forward to close this gap, which includes the amendments to the Council Tax Support Scheme set out in this report. This is referenced in the Budget and Council Tax 2025-26 report, also on this Cabinet agenda. If the amendments to the Council

Tax Support scheme are not approved by Full Council, the budget for 2025-26 will propose to use £5m of reserves to cover the budget shortfall. As reserves can only be used once, £5m will have to be added to the budget gap in the Medium-Term Financial Strategy and 2026-27 budget setting process.

23.0 Legal Considerations

- 23.1 Section 13A(1)(a) and (2) of the Local Government Finance Act 1992 (the 1992 Act) introduced a duty on every billing authority in England to make a scheme specifying the reductions which are to apply to amounts of Council Tax payable, in its area, by: Person whom the authority considers to be in financial need, or Persons in classes consisting of persons whom the authority considers to be, in general, in financial need.
- 23.2 Schedule 1A of the 1992 Act sets out the requirements in relation to adoption or revision of a scheme. Paragraph 2 confirms a scheme must state the classes of person entitled to a reduction and that this may be reference to income, capital, a combination of income and capital, number of dependents and whether an application has been made. Different reductions may be set for different classes. A reduction may be a discount calculated as a percentage, a set amount, expressed as an amount of council tax to be paid or the whole amount of council tax. The scheme must comply with prescribed matters set out by the Secretary of State in regulations.
- 23.3 Paragraph 5 of Schedule 1A confirms a billing authority must consider whether to revise its scheme or to replace it with another scheme for each financial year. Any revisions or replacements must be made no later than 11th March in the financial year preceding that for which the revision or replacement is to have effect. If any revision or replacement has the effect of reducing or removing reduction to which any class of person is entitled, the revision or replacement must include such transitional provision as the authority thinks fit. In accordance with s 67 of the 1992 Act only Full Council has the power to make or amend a Council Tax Support Scheme.
- 23.4 As the proposed Council Tax Support Scheme for 2025-26 will be a revision or replacement of the current scheme there is an obligation to follow the statutory requirements to consult. The Local Government Finance Act 2012 states that the Council must consult with the GLA, which is a precepting authority, when amending a Council Tax Reduction Scheme and that thereafter, the Council must publish a draft amended Council Tax Reduction Scheme and then consult with other such persons who are likely to have an interest in the operation of such a scheme. This report sets out that the plans to undertake this consultation.
- 23.5 The four basic requirements of consultation are set out in the case of R v Brent LBC ex parte Gunning: (i) consultation must be at a time when proposals are at a formative stage; (ii) the proposer must give sufficient reasons for any proposal to permit intelligent consideration and response; (iii) adequate time must be given for consideration and response; (iv) the product of consultation must be taken conscientiously taken into account in finalising any proposals.

- 23.6 In the 2014 Supreme Court case of R (on the application of Moseley) v London Borough of Haringey, the Court confirmed in its judgment that the demands of fairness in the consultation process are likely to be greater when an authority proposes to deprive someone of an existing benefit than when considering a potential future benefit and that fairness may require that interested persons should be consulted not only on the preferred option but also on discarded options. In that specific case, the Supreme Court ruled that Haringey Council's consultation process regarding its Council Tax Reduction scheme was unlawful as it failed to outline alternative options and methods of dealing with the shortfall and cuts to funding. Requirements for a Council Tax Reduction Scheme
- 23.7 Under the Equality Act 2010, the Council has a duty to have due regard to the need to: eliminate unlawful discrimination, harassment and victimisation and any other conduct prohibited by the Act; advance equality of opportunity between people who share a protected characteristic and people who do not share it; and foster good relations between people who share a protected characteristic and people who do not share it.
- 23.8 The public sector equality duty ("PSED"), as set out in section 149 of the 2010 Act, requires the Council, when exercising its functions, to have "due regard" to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, and to advance equality of opportunity and foster good relations between those who have a "protected characteristic" and those who do not share that protected characteristic. There is no prescribed manner in which the equality duty must be exercised, though producing an Equality Impact Assessment is the most usual method through which a Local Authority can demonstrate that due regard has been paid to the PSED.
- 23.9 The PSED is not to achieve the objectives or take the steps set out in section 149 of the Equality Act 2010. The duty on the Council is bring these important objectives relating to discrimination into consideration when carrying out its public functions (in this case, approving a new Council Tax Reduction Scheme for designing a localised scheme for Council tax support within Brent). The phrase "due regard" means the regard that is appropriate in all the circumstances in which the Council is carrying out its functions. There must be a proper regard for the goals set out in section 149 of the 2010 Act. At the same time, when the Members of the Council make their decision on what scheme to adopt for localised council tax support, they must also pay regard to countervailing factors which it is proper and reasonable for them to consider. Budgetary pressures and economic and practical factors will often be important. The amount of weight to be placed on the countervailing factors in the decision-making process will be for Members of the Council to decide when it makes its final decision.
- 24.0 **Equity, Diversity & Inclusion (EDI) Considerations**
- 24.1 The proposed Council Tax Support scheme has been reviewed for its effect on groups with protected characteristics under the Equality Act, and a detailed Equalities Assessment has been prepared and is included in Appendix C.

24.2 The EQIA does identify potential negative impacts on working age people, disabled people, women, people from an ethnic minority group and people facing socio-economic disadvantage, and a summary of these impacts is included below. The EQIA identifies several actions to mitigate the impact of the proposals, and these are summarised below. The EQIA also includes findings from the consultation that are relevant to the protected groups.

25.0 **Impact of the proposals by equality characteristic**

Age

25.1 The proposed change will impact negatively on working age CTS claimants. However, based on the findings from other London authorities who have implemented the same or higher reductions, we do not anticipate the impact to be significant.

25.2 This proposal would mean working age claimants would have an estimated additional £9.15 on average per week to pay in Council tax.

25.3 However, within the scope of the 2025/26 scheme, there is a Council Tax Discretionary policy to enable the Council to consider cases of hardship which will help mitigate any negative impacts.

25.4 Pension age claimants (currently men and women aged 66 and over) will not be affected by the change.

Evidence:

25.5 At present approximately 66.64% of Council Tax Support claimants are working age and 33.36% are pension age.

25.6 For comparison, the working age population (18 – 66 years) in Brent is approximately 86.83% and the pension age population (67 and over) is 13.17%.

25.7 The proposed changes mean that all working age CTS claimants for the purposes of the scheme will have to pay at least 35% towards their Council Tax.

Ethnicity

25.8 Our data shows that BAME claimants are slightly over-represented amongst working age claimants receiving Council Tax Support.

25.9 There could be a negative impact of the proposals on people from Black, Asian, and Minority Ethnic (BAME) groups.

25.10 Support is in place through the Council Tax Discretionary policy for those who suffer hardship because of these proposals in order to mitigate any negative impacts.

Evidence:

25.11 The table above (13.6) show the figures for the breakdown of Brent by ethnicity where they have supplied this information.

Sex

25.12 Since only one claim is submitted per household, it is difficult to fully consider the implications the proposals will have on this protected characteristic.

25.13 However, equalities monitoring indicates that a higher percentage of claims (55.94%) are made by females (married and single titles) compared with males. We also know that lone parents, part-time workers, and carers are more likely to be women. According to our working-age Council Tax Support data women make up 94.33% of lone parents in receipt of Council Tax Support.

25.14 The proposals are therefore considered to have a disproportionate impact on women.

25.16 Support is in place through the Council Tax Discretionary policy for those who suffer hardship because of these proposals in order to mitigate any negative impacts.

Evidence:

25.17 The table above (13.7) show the figures for the breakdown of Brent by gender where they have supplied this information.

Disability

25.18 If the proposals are approved, disabled people who are of working age will also be negatively affected. This is because they are disproportionately represented amongst working age claimants who receive a reduction in Council Tax support.

25.19 Support is also in place through the Council Tax Discretionary policy for those who suffer hardship because of these proposals to mitigate any negative impacts.

25.20 Pension age Council Tax Support claimants are not affected by these proposals.

25.21 It is worth noting that 774 households who have adaptations made to their property receive disabled relief for their Council tax. This means their Council tax band is reduced by a band e.g. someone is Band D, who receives a disabled relief has their liability reduced to Band C.

Evidence:

- 25.22 In terms of Council Tax Support, disabled claimants are defined as people who receive Personal Independence Payment, Disability living allowance, Attendance Allowance or Universal Credit- Health allowance.
- 25.23 Approximately 40.26% of working age Council Tax Support claimants meet the above definition compared with 14.7% of the working age population of Brent who self-identified as disabled as part of the 2021 Census.
- 25.24 The Council recognises the barriers disabled people face and seek to address them by disregarding Disability Living Allowance, Universal Credit Health allowance awards, and Attendance Allowance in the calculation of Council Tax Support. This often increases the amount of Council Tax Support a disabled person is entitled to.
- 25.25 Currently, there are premiums for severe disability, enhanced disability, and a disabled child rate. Such premiums are granted when Housing Benefits applicants receive a relevant disability related benefit granted and administered by the Department for Work & Pensions.
- 25.26 Disabled people who are unable to work receive higher levels of state benefits and while based on the proposals they will be subject to the 35% liability reduction, disabled working age claimants are likely to have a higher income than other unemployed, working age claimants whose council tax support will also be reduced.

Pregnancy and maternity

- 25.27 The proposed changes to the Council Tax Support Scheme may negatively impact people who are pregnant or who have recently had a baby. In particular, the proposal to increase the minimum payment. This group may have less ability to increase their income, for example by increasing hours at work due to childcare responsibilities.

Socio-economic deprivation

- 25.28 The Equality Act 2010 includes a socio-economic duty (section 1) which states that certain public bodies, when making strategic decisions, must consider how their decisions might help to reduce the inequalities associated with socio-economic disadvantage. However, the UK Government has not implemented Section 1 in England, and the duty remains non-binding in England.
- 25.29 Council Tax Support in the main is targeted at households that are financially disadvantaged to support the payment of Council Tax and therefore any change to this scheme is expected to have a negative impact on households that are socio-economically disadvantaged.
- 25.30 In relation to the consultation, respondents who claim benefits were significantly less likely to agree with the proposals than respondents who do not claim benefits.

25.31 Respondents raised concerns that increases in the amount of council tax due would exacerbate existing financial strains, result in heightened debt, increased poverty, and compromises in meeting essential needs, and negatively impact on overall quality of life and mental health. Respondents also raised concerns about the inability to pay council tax without sacrificing other necessities such as food and heating.

Sexuality, gender reassignment, marriage and civil partnership and religion

25.32 The proposed changes to the Council Tax Support scheme are not expected to have a differential impact on the grounds of sexuality, gender reassignment, marriage and civil partnership and religion.

Analysis

25.33 The proposed changes are expected to have a negative impact on most working age adult claimants, as they will receive reduced council tax support and be required to contribute more towards their council tax.

25.34 The next section of the report summarises how the Council has had due regard to the three equality needs contained in section 149(1) of the Equality Act 2010.

The need to eliminate unlawful discrimination, harassment, victimisation, and any other unlawful conduct prohibited by the act.

25.35 The proposed changes to the council tax support scheme are expected to have a disproportionate negative impact on working age adults, people with a disability, women, people who are pregnant or in the maternity period, people from an ethnic minority group and people who are socio-economically disadvantaged, and any disadvantage is justified for the reasons set out above in this report.

25.36 The Council is pursuing the legitimate aim of balancing the Council's budget in the context of the anticipated required savings, so that the Council can continue to deliver statutory services. With uncertain Government funding, economic conditions, increasing demand for services and a forecast significant reduction in reserves the Council has had to consider a range of options to bridge the funding gap and enable us to set a balanced budget and continue to deliver statutory services. The proposals are proportionate considering those budgetary pressures, given the steps taken to limit council tax payments for these groups, and the mitigating measures set out below. This proposal asks all residents to contribute towards Council services that they benefit from.

25.37 For the same reasons, the Council considers that reasonable adjustments have been made in the revised scheme and mitigating measures to limit any disadvantage suffered by disabled persons. Given the need to make savings and balance the budget, it is not reasonable to go further and reduce still further the council tax that should be paid by this cohort.

The need to advance equality of opportunity between people who share and people who do not share a relevant protected characteristic.

- 25.38 As highlighted above, most working-age claimants will be required to contribute more towards their council tax. Claimants would therefore be expected to have reduced disposable income which may mean they are less able to participate in public life and community activities, for example leisure activities, groups, clubs, and organisations.

The need to foster good relations between people who share and people who do not share a relevant protected characteristic.

- 25.39 We do not anticipate that the proposals will have any impact on the Council's ability to foster good relations.

26 Mitigating actions

- 26.1 The Council recognises that some households will be more adversely affected by these proposals than others and that some will now be required to pay some element of their Council tax for the first time, creating affordability issues for many households. Alternatives to the proposals have been considered, as addressed in the report, but other options do not generate the same level of additional income which is required to help the Council meet its budget deficit. Mitigation measures have been considered, including those mentioned in response to the consultation, but most would add to the cost of the scheme and, again, would not allow the Council to generate the income needed to help balance its budget. Those measures which are in place to mitigate the impact of the proposals on households include:
- 26.2 Maintaining the Cost-of-Living information on the Council website to provide residents with information on help with housing costs, debts and bills, extra income, saving energy and help with food.
- 26.3 Continuing to offer the Welfare Advice & Debt Support Service that helps to support residents to maximise their income and get their full entitlement to welfare benefits and provide advice and assistance to support residents with council debts such as rent arrears, Adult Social Care debt, Housing benefits overpayments and Council tax arrears/debt. For other debts residents can be offered a fast-track referral process to Citizens Advice. The aim is to holistically case manage the resident's situation.
- 26.4 Working with voluntary and community sector organisations to promote the Hardship Fund.
- 26.5 Supporting residents to maximise the application of council tax regulations, where reductions are based on circumstances that are not financial but based on non-financial circumstances e.g., disabled relief (based on adaptations to the property that can reduce the council tax liability to the equivalent to one band lower) and severely mentally impaired exemptions (based on doctor's certification and the award of appropriate disability benefits). These are

sometimes not claimed where Council Tax Support based on financial circumstances are claimed so these options may now become more beneficial to mitigate the impact in the reduced support. The Council will work with relevant voluntary groups and the Disability Forum and other partnerships to improve awareness and take up of these provisions.

26.6 There is also a discretionary element to the proposed scheme, whereby the Council Taxpayer's liability may be reduced further if they are experiencing exceptional hardship or are impacted by extraordinary circumstances. These reductions are made under Section 13A(1)(a) and (2) of the Local Government Finance Act 1992 (the 1992 Act) to:

- A person whom the authority considers to be in financial need,
- Or persons in classes consisting of persons whom the authority considers to be, in general, in financial need.

27 **Climate Change and Environmental Considerations**

27.1 No implications

28 **Human Resources/Property Considerations (if appropriate)**

28.1 No implications

29 **Communication Considerations**

29.1 The Council recognises that some households will be more adversely affected by these proposals than others and that some will now be required to pay some element of their Council tax for the first time, creating affordability issues for many households. Alternatives to the proposals have been considered, as addressed in the report, but other options do not generate the same level of additional income which is required to help the Council meet its budget deficit. Mitigation measures have been considered, including those mentioned in response to the consultation, but most would add to the cost of the scheme and, again, would not allow the Council to generate the income needed to help balance its budget.

29.2 The communication plan includes all activities pre and post consultation. Once the Cabinet and Full Council decision is confirmed the communication with all households and all stakeholders will start in a timely manner. The communication plan includes information about the cost of living and holistic support for our residents.

Report sign off:

Peter Gadsdon

Corporate Director of Partnerships, Housing and Resident Services

Appendix A

Income Band Changes

Option 2

Current scheme allows residents to claim up to 100% support.

In this proposal Council Tax Support income band percentage reductions would be amended as per table to the right

Explanation:

All CTS claimants will be expected to contribute a minimum of 35% towards their Council Tax liability. Their Council Tax Support award will then be calculated based on their income and which band they fall into.

Savings:

Applying this option would reduce the overall the cost of the scheme by **£7,632,909.20**

Income Band per week	Current Scheme	Proposed	Number of claimants
£0-£80	100%	65%	12402
£80-£110	80%	50%	531
£110-£150	50%	30%	893
£150-£250	30%	20%	2967
£250+	0%	0%	0

Scenario 1 – Single parent, Band C, 2 children, working 16 hours per week at national living wage (£183.04).

Under this proposal, this would mean an increase to their council tax owed per week of £2.61 / £135.72 per annum

<u>Current Scheme</u>		<u>Proposed Scheme</u>	
Weekly council tax liability	£26.03	Weekly council tax liability	£26.03
Weekly CTR entitlement	£7.81	Weekly CTR entitlement	£5.21
Weekly council tax to pay	£18.22	Weekly council tax to pay	£20.83

Scenario 4 – Couple, Band C, 2 children, passported. 1 non-dependant not-working.

Under this proposal, this would mean an increase to their council tax owed per week of £12.15 / £631.70 per annum

<u>Current Scheme</u>		<u>Proposed Scheme</u>	
Weekly council tax liability	£34.71	Weekly council tax liability	£34.71
Weekly CTR entitlement	£29.71	Weekly CTR entitlement	£17.56
Weekly council tax to pay	£5.00	Weekly council tax to pay	£17.15

This page is intentionally left blank

Appendix B

Non-dependant deductions changes

Option 2

Simplifying non-dependant charges to have either an **£8 or £20** non-dependant charge based on whether non-dependant is in work or out of work.

Explanation:

2 ND charges only. Simplify administration and remove the need to verify income for non-dependants where CTS only claim.

Savings:

Applying this option would reduce the overall the cost of the scheme by **£697,513.59**

Explanation	Current ND charge	*Proposed ND charges	Households with a non-dependant (3163 total)
Not working	5	8	1866
Earning Up to £150	10	20	220
Earning £150-£200	15	20	308
Earning £200+	20	20	769

Scenario 3 – Single Parent not working, Band D, 2 children, passported, non-dependant working (£100 per week).

Under this proposal, this would mean an increase to their council tax owed per week of £10.00 / £520.00 per annum

<u>Current Scheme</u>		<u>Proposed Scheme</u>	
Weekly council tax liability	£29.29	Weekly council tax liability	£29.29
Weekly CTR entitlement	£19.29	Weekly CTR entitlement	£9.29
Weekly council tax to pay	£10.00	Weekly council tax to pay	£20.00

Scenario 4 – Couple, Band D, 2 children, passported. 1 non-dependant not-working.

Under this proposal, this would mean an increase to their council tax owed per week of £3.00 / £156.00 per annum

<u>Current Scheme</u>		<u>Proposed Scheme</u>	
Weekly council tax liability	£39.05	Weekly council tax liability	£39.05
Weekly CTR entitlement	£34.05	Weekly CTR entitlement	£31.05
Weekly council tax to pay	£5.00	Weekly council tax to pay	£8.00

This page is intentionally left blank

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	New Council Tax Support Scheme
DEPARTMENT:	Partnerships, Housing and Resident Services
TEAM:	Customer Services & Assessments
LEAD OFFICER:	Sunita Ghudial
DATE:	14 January 2025

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 Council is obliged to set a local Council Tax Support Scheme every year following the abolition of the national Council Tax Benefit Scheme in 2013. The Council introduced a local Council Tax Support (CTS) Scheme to provide financial assistance for working-age households in paying their Council Tax. Council Tax Support is awarded as a reduction on a council taxpayers' bills, like a discount, so the household pays less. The scheme has two parts a statutory scheme for pensioners and a non-statutory scheme that covers the working age population. These proposals impact only on the non-statutory elements of the scheme and do not affect the statutory scheme for pensioners.

Anyone who is liable for council tax (tenants and homeowners) can apply for council tax support.

The current local Council Tax Support scheme has been in place since April 2020. It is proposed to introduce a new scheme from 2025/26.

Council Tax Support (CTS) is a local scheme determined by the Council which provides assistance with Council Tax liabilities to households on low incomes. The objectives of the review are: -

- To maintain a scheme which is fair and simple to understand.
- To further align the scheme with Universal Credit and ensure the scheme is fit for future needs.
- To address any elements of the current scheme which are unsustainable or undesirable.
- To streamline administrative processes and reduce complexity for claimants.

Brent faces a significant challenge setting the budget for 2025/26 with a budget gap of c£16m. This is to be addressed through identifying further savings, efficiencies, and income generation options.

The changes being proposed will provide an option for Cabinet in addressing this budget gap. If the amendments to the Council Tax Support scheme are not approved by Full Council and no alternative savings can be identified, it is proposed to use £5m of reserves to cover the budget shortfall in 2025/26. As reserves can only be used once, £5m will have to be added to the budget gap in the Medium-Term Financial Strategy and 2026/27 budget setting process.

Other reasons for the proposed changes to the scheme are:

- In the current scheme the income bands have remained static and not changed with CPI growth. The new proposed scheme will increase income bands and non-dependant income is in line with the increased CPI ensuring households do not fall out of support.
- The new proposed scheme ensures that households liable for Council tax and are on Universal Credit- the notification date from DWP is used to make the CTS award, ensuring households do not lose on entitlement. During 2025/26, additional working age households will be transferred to Universal Credit (UC). There is an opportunity to simplify the administration of the CTS scheme.

The costs of providing CTS under the current working age scheme is forecast to be £19.9m in 2024/25 rising to £21.2m in 2025/26. The proposed scheme options would be expected to reduce this by £8m, which would deliver savings of £5m. The remaining £3m will be utilised for a hardship fund of £1.5m and £1.5m to make a mandatory contribution to the Greater London Authority through the Mayor of London for their precept for 2025/26.

As well as proposals to make changes to the CTS scheme, the Council is also proposing to continue to use its policy under section 13A of the Local Government Finance Act 1992 to further support households with their council tax bills. The Council will use its current mechanism of Households Support fund for households to apply for support with their council tax. Vulnerable groups will be identified using our data sets on Housing Benefits and Council tax support. The Council will work closely with external and internal stakeholders to provide holistic services with income maximisation and debt advice. The council could further refine and promote available support options for residents struggling with council tax bills.

Pensioners will be unaffected by this change as their CTS will be calculated as prescribed by legislation. Pensioners will continue to receive full Council tax Support up to 100% of their council tax liability depending on their personal circumstances. Pension age is currently set at is 66 years.

The Council is considering changing the CTS scheme, for 'working age' claimants as the current scheme has become unaffordable in the current economic climate.

2025/26 proposal

The proposed changes to the CTS scheme, for 'working age' claimants is set out in option 2 below.

Option 1

No changes are made to the existing CTS scheme. If this is the preferred option, members will need to identify £5m of savings elsewhere within the Council's budget. This may have a detrimental impact on other services given the significant savings that are already planned.

If the amendments to the Council Tax Support scheme are not approved by Full Council, the budget for 2025/26 will not be a legally balanced budget and will therefore the proposal will be to use £5m of reserves to cover the budget shortfall in 2025/26. As reserves can only be used once, £5m will have to be added to the budget gap in the Medium-Term Financial Strategy and 2026/27 budget setting process.

Option 2

- Introduce a standard 35% minimum payment for working age households and apply a percentage reduction to each of the income bands. This means all CTS claimants will be expected to contribute a minimum of 35% towards their Council Tax liability. Their CTS will then be calculated based on their income and this will determine which income band they fall into.
- Simplify the non-dependant charges and have just two flat rate non-dependant deductions for most households with other adults living in the property, £8 per week for non-dependants “out of work” and £20 per week for non-dependants “in work”. This would remove the need to verify income for non-dependants for CTS claims and reduce the administration burden.

Proposed Technical Administrative Changes

- Backdating will be restricted to 1 month.
- Accept Universal Credit notification from DWP as start date of claim for CTS.
- To increase/decrease the income bands in line with Consumer Pricing Index (CPI) from September of previous year.
- To increase/decrease the non-dependant charges in line with CPI from September of previous year.
- Review the section 13A policy for hardship fund for Council tax.

Other options that were taken into consideration that were not viable were:

- Minimum CTS award ranging from 20% to 65%.
- Maximum CTS to be capped to Band D
- Change the income bands.
- Apply a cap on a minimum award of CTS of £2/£5 per week.

The above options for various reasons were not viable as it would not give us the necessary savings needed, administratively would not be efficient and households impacted by the proposed changes would be significantly higher.

The proposals were subject to an 8-week public consultation which ran from 21 October to 15 December 2024, details around the findings are captured in section B and separately as part of the consultation findings that report that will accompany the new Council Tax Support Scheme proposal pack. Following public consultation, a decision on the Council Tax Support Scheme for 2025/26 will be made in March 2025 by Cabinet and Council.

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

Total population of Council Tax Support Scheme claimants

As at 2024/25 there were 135,000 properties within the borough with a Council Tax liability. At that time, Brent had 25,692 households receiving CTS, showing that 19.03% of total taxpayers receive Council Tax Support.

Of the 25,692 households receiving CTS, the breakdown of impacted groups is as follows: 8428 pensioners and 16,833 are working age. This information is provided in greater detail below:

Breakdown of current CTS scheme customer profile			
Type of customer	Number	Yearly (£)	% of Total
Pensioner Scheme			
Pensioner	8428	£12,901,452.70	39.29%
Working-Age Scheme (Employed)			
Single Person No Dependants	2996	£3,018,733.87	9.19%
Lone Parents	2472	£2,241,297.48	6.83%
Couples with no Dependants	488	£582,135.86	1.77%
Couples with Dependants	2039	£1,926,144.02	5.87%
Working-Age Scheme (Not employed)			
Single Person No Dependants	5413	£6,963,607.76	21.21%
Lone Parents	2308	£3,288,646.65	10.02%
Couples with no Dependants	436	£689,629.31	2.10%
Couples with Dependents	681	£1,222,023.06	3.72%
Total	25,692	£32,833,670.71	100%

Breakdown of working age CTS Scheme customer profile by age		
Age of Customer	Number	% of Total
18 to 25	490	2.91%
26 to 35	2531	15.04%
36 to 45	4144	24.62%
46 to 55	4701	27.93%
56+	4967	29.51%
Total	16833	100%

Breakdown of working age CTS scheme customer by gender		
Gender of Customer	Number	% of Total
Female	9416	55.94%
Male	7195	42.74%
Unknown	222	1.32%
Total	16833	100%

<u>Breakdown of working age CTS scheme customer by ethnicity</u>		
<u>Ethnicity</u>	<u>Number</u>	<u>% of Total</u>
White	2272	32.45%
Black or Black British	2067	29.52%
Asian or Asian British	1225	17.50%
Arab	762	10.88%
Mixed Background	430	6.14%
Any Other Ethnicity	205	2.92%
Prefer not to say	41	0.59%

Note: The ethnicity data above is based on 42% of the CTS application having provided their ethnicity data. 58% of the application was unknown.

Breakdown of working age CTS scheme customer by disability	Number	% of Total
Not in receipt of disability benefit	10056	59.74%
In receipt of disability benefit	6777	40.26%
Total	16833	100%

Pensioner Households

Pensioners (of state pensionable age 66 and above) will not be impacted by the proposed changes. Pensioners remain protected as CTS is still controlled nationally for this age group and can cover up to 100% of their CTS bill depending on the circumstances of the household. Therefore, there will be no impact on pensioners, or their council tax support awards and this group has not been considered as part of this equality impact assessment.

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. This proposal will have a negative impact on all groups with protected characteristics and a disproportionate impact cannot be ruled out completely. Most CTS claimants are female, indicating a potential disproportionate effect by gender. People between the ages of 46 and 66 make up most claimants, indicating this age group are also more likely to experience a disproportionate impact. Several mitigation actions have been addressed below as part of the consultation feedback.

Although socio-economic status is not a protected characteristic, most claimants in receipt of working-age council tax support under the current scheme fall into the lowest income category and receive the highest level of support. As a result, lower income households are likely to be more negatively impacted by the change, and there may be a disproportionate socioeconomic implication to consider.

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 current scheme pays CTS entitlement based on income brackets & non-dependant deductions. Under the current scheme, claimants; in some circumstances, can receive up to a 100% reduction on their Council Tax bill. Detailed equalities analyses have been made for the current scheme and found that the scheme impacts are in general spread evenly across protected and non-protected groups.

Currently, claimants must provide information around their age, gender, and disability status as this is requirement for processing claims. There are also optional fields for claimants to share their ethnicity/race. Hence, we have robust quantitative insights around these characteristics and not others.

To ensure we capture all characteristics, we will be changing our application form to ensure these are included.

Under the scheme’s current design, a large number of claimants in receipt of working-age council tax support fall under the lowest income category and receive the highest amounts of support. Consequently, this is the group or income bracket where a significant proportion of the savings are required to be derived from. Therefore, whilst the intention remains that the impacts of this change are not disproportionately felt by any particular group there may be a disproportionate socioeconomic implication to consider due to lower income households being more negatively impacted by the change.

It is worth noting that there are also several statutory requirements that all local CTS schemes must be able to demonstrate (e.g. that they “incentivise work”).

Once again, the intention is that impacts are not disproportionately felt by any group. This analysis considers the impacts of the proposed new scheme on groups of claimants with protected characteristics and discusses the policy intentions behind the scheme design which may have resulted in these impacts, within the main part of the report and in its Conclusion.

There are two key changes as part of the proposed new scheme: -

1. All CTS claimants will be expected to contribute a minimum of 35% towards their Council Tax liability. Their Council Tax Support award will then be calculated based on their income and which band they fall into. All income band award percentages would be reduced as per table below:

Income per week between	Current Scheme	Proposed
£0-£80	100%	65%
£80-£110	80%	50%
£110-£150	50%	30%
£150-£250	30%	20%
£250+	0%	0%

2. A non-dependant deduction is an amount of money taken from Council Tax Support entitlement because there is a non-dependant adult living in the household. A non-dependant is someone aged 18 and over who normally lives within the household such as an adult daughter, son, relative or friend.

Non-dependant charges would be simplified to have either an £8 or £20 non-dependant charge based on whether non-dependant is in work or out of work as per the tables below.

These charges reflect the expectation that non-dependants contribute to the household expenses, including the council tax.

Current Scheme

Non-dependant's income	Deduction per week
Not working	£5
Working (includes Carer's Allowance income) - income up to £150 per week	£10
Working - income between £150 and £200 per week	£15
Working - income over £200 per week	£20

Proposed Scheme

Explanation	Proposed Non-Dependant Charge
Not In Work	£8
In Work	£20

Our current non dependant breakdown shows 2806 non dependants are not working and 1328 non dependants are working.

Consultation

The consultation outcome report has been published separately comprised of a more comprehensive set of findings. Key components emerging from the report are captured below.

A wide variety of methods were used as part of the Consultation process with the aim of ensuring the approach was inclusive of all groups including those claimants and non-claimants of CTS.

Overall, there were 397 responses to the consultation of which 176 were currently in receipt of CTS. Although the number of responses was low in comparison with the volume of communications that were issued, this appears to be above the national response level experienced by the majority of Councils who have consulted since the introduction of CTS and is also a higher level than when the last CTS consultation was undertaken in 2019 when only 194 were received.

In relation to high level information around the characteristics of the respondents (see more detail in the full report):

- Age: most respondents were aged 31-40 (24.9%), 41-50 (24.9%), 51-60 (22.6%), 60+ (14.2%).
- Sex: Female (50.4%); Male (38.3%).
- Ethnicity: White British (23.2%), prefer not to say (20.3%), Asian/ / Asian British / Indian (12.3%), White European (9.2%), Black / Black British / African (7.7.%), Black / Black British / Caribbean (7.5%).
- Religion: Christian (25.9%), prefer not to say (25.2%), no religion (23.7%), Muslim (13.1%), Hindu (7.4%).
- Sexual orientation: Heterosexual / straight (67.9%), prefer not to say (24.5%).

The Council followed best practice guidelines by undertaking an 8-week public and stakeholder consultation, between 21 October 2024 and 15 December 2024. Consultation activities included: -

- Questionnaire on Council website promoted via email and letter to all claimants, and all other households.
- Direct engagement by email and letter with Brent Hub partners and CAB with offer to attend dedicated meetings with each organisation.
- Direct engagement by email and letter with partners with offer to attend dedicated meetings with each organisation.
- Direct engagement with the Greater London Authority, Citizens Advice, Disability Forum, and Community event with Adult Social Care

- Drop-in sessions (in all 6 Libraries across the borough)
- Banners in Customer Service Centre, Libraries and at all events.
- Leaflets with consultation link and barcode to respond to consultation.
- Help to complete consultation available at all public buildings e.g. Customer Service Centre, Hubs, Turning point.
- Stakeholder forums to obtain feedback and input from voluntary sector and community organisations.
- Mailbox set up for CTS-related comments and queries.
- Promoting consultation via auto reply message for Council Tax & CTS emails
- Direct engagement by attend Brent Connect meetings.
- Consultation published in the voluntary sector newsletter.
- Face to face engagement in the Customer Service Centre
- Staff engagement

Appendix A captures the impact of the proposed scheme changes by equality characteristics. This has been further broken down into households with and without a non-dependant. This is to demonstrate the varying impact on those households affected by one or both of the proposed scheme changes.

Socio-economic deprivation

As socio-economic deprivation is not captured in section B.2 this provides a brief outline of implications around this characteristic.

The Equality Act 2010 includes a socio-economic duty (section 1) which states that certain public bodies, when making strategic decisions, must consider how their decisions might help to reduce the inequalities associated with socio-economic disadvantage. However, the UK Government has not implemented Section 1 in England and the duty remains non-binding in England.

Council Tax Support in the main is targeted at households that are financially disadvantaged to support the payment of Council Tax and therefore any change to this scheme is expected to have a negative impact on households that are socio-economically disadvantaged.

In relation to the consultation, respondents who claim benefits were significantly less likely to agree with the proposals than respondents who do not claim benefits. Across all six proposals, respondents who claim benefits were more likely to disagree (than agree) that the Council should implement the change.

When asked to identify the potential negative impact on their households, respondents raised concerns that increases in the amount of council tax due would exacerbate existing financial strains, result in heightened debt, increased poverty, and compromises in meeting essential needs, and negatively impact on overall quality of life and mental health. Respondents also raised concerns about the inability to pay council tax without sacrificing other necessities such as food and heating.

There is also a discretionary element to the proposed scheme, whereby the Council Taxpayer's liability may be reduced further if they are experiencing exceptional hardship or are impacted by extraordinary circumstances.

These reductions are made under Section 13A(1)(a) and (2) of the Local Government Finance Act 1992 (the 1992 Act) to:

- a) A person whom the authority considers to be in financial need,
 b) Or persons in classes consisting of persons whom the authority considers to be, in general, in financial need.

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

Details of impacts identified	
	<p>The proposed change will impact negatively on working age CTS claimants. However, based on the findings from other London authorities who have implemented the same or higher reductions, we do not anticipate the impact to be significant.</p> <p>This proposal would mean working age claimants would have an estimated additional £9.15 on average per week to pay in Council tax.</p> <p>However, within the scope of the 2025/26 scheme, there is a Council Tax Discretionary policy to enable the Council to consider cases of hardship which will help mitigate any negative impacts. The assessment will be similar to the Resident Support Fund discretionary award looking at households’ circumstances e.g. flood, fire, terminal illness, financial support through Credit Union, debt advice and income maximisation.</p> <p>Evidence: At present approximately 66.64% of Council Tax Support claimants are working age and 33.36% are pension age.</p> <p>For comparison, the working age population (18 – 66 years) in Brent is approximately 86.83% and the pension age population (67 and over) is 13.17%.</p> <p>The proposed changes mean that all working age CTS claimants for the purposes of the scheme will have to pay at least 35% towards their Council Tax.</p> <p><u>Pensioners</u> (those at state pension age)</p> <p>Pensioners are a protected group (prescribed by central government) for the purposes of the council tax support scheme so will not be financially affected; all changes in CTS entitlement affect only working age claimants.</p> <p><u>Working age</u></p> <p>The data shows that those claimants aged 56 or above (29.51%) are more likely to be affected by the proposals compared to those aged 18 to 25 and 26 to 35 (2.91% and 15.04% respectively).</p>

When compared to the total borough working age population aged 56 or above (14.49%), the number is almost double for those in receipt of CTS (29.51%). This proposal is therefore more likely to have an impact on this group.

DISABILITY

Details of impacts identified

If the proposals are approved, disabled people who are of working age will also be negatively affected. This is because they are disproportionately represented amongst working age claimants who receive a reduction in Council Tax support.

Support is also in place through the Council Tax Discretionary policy for those who suffer hardship because of these proposals in order to mitigate any negative impacts.

Pension age Council Tax Support claimants are not affected by these proposals.

It is worth noting that 774 households who have adaptations made to their property receive disabled relief for their Council tax. This means their Council tax band is reduced by a band e.g. someone is Band D, who receives a disabled relief has their liability reduced to Band C.

Evidence:

In terms of Council Tax Support, disabled claimants are defined as people who receive Personal Independence Payment, Disability living allowance, Attendance Allowance or Universal Credit- Health allowance.

The data shows that 44.96% of CTS scheme working age claimants are in receipt of disability related benefits and will be directly affected by the proposals.

The Council recognises the barriers disabled people face and seek to address them by disregarding Disability Living Allowance, Universal Credit Health allowance awards, and Attendance Allowance in the calculation of Council Tax Support. This often increases the amount of Council Tax Support a disabled person is entitled to.

Currently, there are premiums for severe disability, enhanced disability, and a disabled child rate. Such premiums are granted when Housing Benefits applicants receive a relevant disability related benefit granted and administered by the Department for Work & Pensions.

Disabled people who are unable to work receive higher levels of state benefits and while based on the proposals they will be subject to the 35% liability reduction, disabled working age claimants are likely to have a higher income than other unemployed, working age claimants whose council tax support will also be reduced.

RACE

<p>Details of impacts identified</p>	<p>Our data shows that BAME claimants are slightly over-represented amongst working age claimants receiving Council Tax Support. There could be a negative impact of the proposals on people from Black, Asian, and Minority Ethnic (BAME) groups.</p> <p>Support is in place through the Council Tax Discretionary policy for those who suffer hardship because of these proposals in order to mitigate any negative impacts.</p> <p>Evidence: The table above (see point 2) shows the figures for the breakdown of Brent by ethnicity/race and for Benefits claimants where they have supplied this information.</p> <p>The data indicates that the largest ethnic group of claimants for CTS are White at 25.07% which is below the total White borough working age population of 34.6%. BME people make up 51.75% of claimants which is below the total BME borough working age population of 65.4%.</p> <p>As data is unavailable for 58% of claimants and the race breakdown is not provided, it is not possible to analyse the impact with any statistical significance.</p>
---	---

SEX

<p>Details of impacts identified</p>	<p>Due to the fact that only one claim is submitted per household, it is difficult to fully consider the implications the proposals will have on this protected characteristic.</p> <p>However, equalities monitoring indicates that a higher percentage of claims (55.94%) are made by females (married and single titles) compared with males. We also know that lone parents, part-time workers, and carers are more likely to be women. According to our working-age Council Tax Support data women make up 94.33% of lone parents in receipt of Council Tax Support.</p> <p>The proposals are therefore considered to have a disproportionate impact on women.</p> <p>Support is in place through the Council Tax Discretionary policy for those who suffer hardship because of these proposals in order to mitigate any negative impacts.</p> <p>Evidence: The table above (see point 2) shows the figures for the breakdown of Brent by gender where they have supplied this information.</p>
---	--

SEXUAL ORIENTATION

Details of impacts identified	<p>We do not collect regular information on this characteristic, and it is not required to process, administer, and monitor the Local Council Tax Support Scheme. Therefore, there is less information available to detail the impacts on this characteristic when compared to age, disability, race, and sex.</p> <p>That said, the proposed changes to the Council Tax Support scheme are not expected to have a differential impact on the grounds of sexual orientation.</p> <p>As the updated scheme is implemented, we will continue to monitor any implications for specific characteristics and will adapt accordingly.</p>
--------------------------------------	---

PREGANCY AND MATERNITY

Details of impacts identified	<p>We do not collect regular information on this characteristic, and it is not required to process, administer, and monitor the Local Council Tax Support Scheme. Therefore, there is less information available to detail the impacts on this characteristic when compared to age, disability, race, and sex.</p> <p>The proposed changes to the Council Tax Support Scheme may negatively impact people who are pregnant or who have recently had a baby. In particular, the proposal to increase the minimum payment. This group may have less ability to increase their income, for example by increasing hours at work due to childcare responsibilities.</p> <p>As the updated scheme is implemented, we will continue to monitor any implications for specific characteristics and will adapt accordingly.</p>
--------------------------------------	---

RELIGION OR BELIEF

Details of impacts identified	<p>We do not collect regular information on this characteristic, and it is not required to process, administer, and monitor the Local Council Tax Support Scheme. Therefore, there is less information available to detail the impacts on this characteristic when compared to age, disability, race, and sex.</p> <p>That said, the proposed changes to the Council Tax Support scheme are not expected to have a differential impact on the grounds of religion.</p> <p>As the updated scheme is implemented, we will continue to monitor any implications for specific characteristics and will adapt accordingly.</p>
--------------------------------------	---

GENDER REASSIGNMENT

Details of impacts identified	<p>We do not collect regular information on this characteristic, and it is not required to process, administer, and monitor the Local Council Tax Support Scheme. Therefore, there is less information available to detail the impacts on this characteristic when compared to age, disability, race, and sex.</p> <p>That said, the proposed changes to the Council Tax Support scheme are not expected to have a differential impact on the grounds of gender reassignment.</p> <p>As the updated scheme is implemented, we will continue to monitor any implications for specific characteristics and will adapt accordingly.</p>
--------------------------------------	--

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	<p>We do not collect regular information on this characteristic, and it is not required to process, administer, and monitor the Local Council Tax Support Scheme. Therefore, there is less information available to detail the impacts on this characteristic when compared to age, disability, race, and sex.</p> <p>That said, the proposed changes to the Council Tax Support scheme are not expected to have a differential impact on the grounds of marriage and civil partnership.</p> <p>As the updated scheme is implemented, we will continue to monitor any implications for specific characteristics and will adapt accordingly.</p>
--------------------------------------	---

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

The impacts identified in this EIA are not unlawful under the Equality Act, as the changes to the Council Tax Support scheme apply universally and are not explicitly targeted at any specific group.

The Act requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different groups. Disproportionate impacts on protected groups must be justified to show they are a proportionate means of achieving a legitimate aim. As such, this EIA includes:

1. A justification for the changes, showing that they are necessary and proportionate.
2. An explanation of measures available to minimise or address the disproportionate impacts, including the Council Tax Discretionary policy to enable the Council to consider cases of hardship.

3. A commitment to ongoing monitoring and engagement with affected groups to ensure compliance with equality obligations.

The proposed changes to the council tax support scheme are expected to have a disproportionate negative impact on working age adults, people with a disability, women, people who are pregnant or in the maternity period, people from an ethnic minority group and people who are socio-economically disadvantaged, and any particular disadvantage is justified for the reasons set out above in this report. The Council is pursuing the legitimate aim of balancing the Council's budget in the context of the anticipated required savings, so that the Council can continue to deliver statutory services. With uncertain Government funding, economic conditions, increasing demand for services and a forecast significant reduction in reserves the Council has had to consider a range of options to bridge the funding gap and enable us to set a balanced budget and continue to deliver statutory services. The proposals are proportionate in light of those budgetary pressures, given the steps taken to limit council tax payments for these groups, and the mitigating measures set out below. This proposal asks all residents to contribute towards Council services that they benefit from. For the same reasons, the Council considers that reasonable adjustments have been made in the revised scheme and mitigating measures to limit any disadvantage suffered by disabled persons. Given the need to make savings and balance the budget, it is not reasonable to go further and reduce still further the council tax that should be paid by this cohort.

The need to advance equality of opportunity between people who share and people who do not share a relevant protected characteristic.

As highlighted above, most working-age claimants will be required to contribute more towards their council tax. Claimants would therefore be expected to have reduced disposable income which may mean they are less able to participate in public life and community activities, for example leisure activities, groups, clubs, and organisations.

The need to foster good relations between people who share and people who do not share a relevant protected characteristic.

We do not anticipate that the proposals will have any impact on the Council's ability to foster good relations.

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, directly as part of the overall consultation exercise on the council's budget proposals. Secondly as part of an 8-week public consultation which includes contact with all current benefit claimants as well as other households, voluntary groups, and stakeholders.

Stakeholders in this assessment and what is their interest in it?

Stakeholders	Interest
Council Tax Support Claimants	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process.
Local interest groups have been contacted and drop-in sessions arranged/offered e.g. HUB partners, Brent Connect, Voluntary Organisations, Members of Disability forum etc.	<p>These groups may work with the affected claimants and will need to have the right information to provide support and advice.</p> <p>Drop-in session across all Brent Libraries were publicised on our website and correspondence to claimants.</p>
Brent households	Not implementing the scheme may put increased financial pressures on other Council services which may have an impact on some Brent households.
Heads of Revenues and Benefits	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process.
Corporate Director of Finance	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process and that the administration of the scheme is providing value for money to the council and Brent households.
Chief Executive	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process and that the administration of the scheme is providing value for money to the council and Brent households.
Cabinet Member for Finance	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process and that the administration of the scheme is providing value for money to the council and Brent households.
Council Cabinet	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process and that the administration of the scheme is providing value for money to the council and Brent households.
Leader of the Council	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process and that the administration of

	the scheme is providing value for money to the council and Brent households.
--	--

The feedback and findings from the consultation exercise will be published in a report to Full Council in February 2025.

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

Prior to Full Council determining the final scheme design in February 2025, the EIA will be reviewed and updated if appropriate.

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

The proposed changes to the current CTS scheme will have a disproportionate impact on low income working age households because CTS support is designed for low income working age households.

Any disadvantage is justified for the reasons set out in the consultation paper. The Council is pursuing the aim of reducing the Council's budget gap of £16m for 2025/26 so that the Council can continue to deliver key statutory services. With uncertain funding from central Government, high inflation over the past 2 years, increasing demand for services and a forecast reduction in reserves, the Council has had to consider a range of options to bridge the funding gap and enable us to set a balanced budget and continue to deliver statutory services. The proposals are considered proportionate considering the budgetary pressures being faced by the Council. Working-age claimants will be required to contribute towards their Council Tax. The increased cost may mean claimants are less able to participate in public life and community activities.

The consultation collective comments and suggestions to the proposal are listed below:

- Lower the Minimum Payment: Reducing the current 35% minimum council tax payment, one of the highest in the UK, would help alleviate financial pressure on residents.
- Recognise Financial Vulnerability: Eligibility for CTS already indicates financial hardship and should be considered before enforcement actions are taken.
- Expand Discretionary Support: Making greater use of the Council Tax Discretionary Reduction Policy could offer critical relief to those most in need.
- Enhance Awareness of Support: The council could further refine and promote available support options for residents struggling with council tax bills.

Maintain Flexible Backdating Rules: Retaining the current backdating policy, which allows claims to be backdated to the start of the financial year for valid reasons, would ensure continued support for vulnerable residents. Having considered all above, in terms of mitigations, if anyone affected by the changes is struggling to afford the increase in their Council Tax charge, they would be able to approach the council for financial assistance. The

Council proposes to set aside £1.5m to further support households under the Section 13A Discretionary Policy, where justified this will mean reducing households' council tax charge.

The Council operates through its Community Hubs, Libraries and Family Well-being Centres a holistic approach to welfare, financial support, and income maximisation for its households. This includes debt and budgeting advice. It will ensure that households who approach our services are advised appropriately and provided the correct financial support to avoid further debt.

The Council through its referral routes with voluntary partners and external organisations will proactively reach out to them providing additional support and signposting appropriately. Our strong relationship with the Health and Wellbeing teams, social prescribers and Adult Social Care teams will allow the Council to provide support for households struggling to pay and need financial aid.

Maintaining the Cost-of-Living information on the Council website to provide residents with information on help with housing costs, debts and bills, extra income, saving energy and help with food.

Working with voluntary and community sector organisations to promote the Hardship Fund. Supporting residents to maximise the application of council tax regulations, where reductions are based on circumstances that are not financial but based on non-financial circumstances e.g., disabled relief (based on adaptations to the property that can reduce the council tax liability to the equivalent to one band lower) and severely mentally impaired exemptions (based on doctor's certification and the award of appropriate disability benefits).

These are sometimes not claimed where Council Tax Support based on financial circumstances are claimed so these options may now become more beneficial to mitigate the impact in the reduced support. The Council will work with relevant voluntary groups and the Learning Disability Partnership Board to improve awareness and take up of these provisions.

Maintaining the principle that the Council Tax Support financial assessment for those with disabilities is based on higher applicable amounts and premiums (the Government assessment of need). This results in a higher award of Council Tax Support when compared with a household with no disability. Similarly, if in receipt of Universal Credit or legacy passported benefits such as Income Support, Income based

There is also a discretionary element to the proposed scheme, whereby the Council Taxpayer's liability may be reduced further if they are experiencing exceptional hardship or are impacted by extraordinary circumstances.

These reductions are made under Section 13A(1)(a) and (2) of the Local Government Finance Act 1992 (the 1992 Act) to:

- a) A person whom the authority considers to be in financial need,
- b) Or persons in classes consisting of persons whom the authority considers to be, in general, in financial need.

The proposed Council Tax Support scheme has been reviewed for its effect on groups with protected characteristics under the Equality Act, and a detailed Equalities Assessment has been prepared and is included in Appendix C

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

CTS caseload and expenditure will be monitored monthly during 2025/26.

Impacts on groups with protected characteristics will be monitored, through Council Tax Collection rates, Section 13A Discretionary applications and issues raised by households.

The Council is required to review its CTS scheme each year and to agree its scheme for the following year by 11 March of the preceding financial year. The scheme review for 2025/26 will include a full refresh of the EIA to establish whether there have been any unforeseen impacts which require addressing for 2026/27.

SECTION C - CONCLUSIONS

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

The council has taken care to review and update the CTS Scheme and to ensure that it is simple, efficient and has regards to the requirements made under the Government's statement of intent.

The proposal to introduce a minimum award amount has been developed to deliver a simpler, less administratively burdensome CTS scheme while reducing the overall cost of the scheme.

The proposal to have two flat rate non-dependant deduction is to reduce the administrative burden, however this will have an indirect impact on the applicant as it is assumed that the non-dependant will increase their contribution towards the Council Tax bill.

If anyone affected by the changes is struggling to afford the increase in their Council Tax charge, they would be able to approach the council for financial assistance. The Council proposes to set aside £1.5m to further support households under the Section 13A Discretionary Policy, where justified this will mean reducing households' council tax liability to zero.

The proposed changes will not affect pensioners. This is mandatory as legislation prescribes that CTS schemes in respect of pensioners must adhere to one national scheme.

This proposal will deliver £5m of savings to the Council's budget from 2025/26, which will help to protect front line services such as adult social care and children's services from further significant reductions.

The council is proposing to make these changes which will be adopted 1 April 2025 and will be in place for the duration of 2025/26, during which time its impact will be monitored.

SECTION D – RESULT

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

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	X
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.

Action	Expected outcome	Officer	Completion Date
Public and stakeholder consultation	Better understand potential impacts and incorporate mitigating actions for negative impacts.	Peter Cosgrove/ Asha Vyas/Sunita Ghudial	15 December 2024
Ensuring that changes to the scheme are communicated in an accessible way to claimants with an information or communication need e.g. caused by a disability or language barrier.	That claimants with information or communication needs are assisted where necessary so that they fully understand the change and any potentially potential impacts; and that they are less likely to fall into Council Tax arrears as a result.	Peter Cosgrove/ Asha Vyas/ Sunita Ghudial	January – March 2025
Ensure that the discretionary aspect of the new scheme is utilised	Officers identify and promote the discretionary aspect where appropriate.	Peter Cosgrove / Asha Vyas/	April 2025 – March 2026

<p>where appropriate to prevent hardship. This includes ensuring that staff training equips officers with the awareness to identify where a discretionary payment may be appropriate, and how such requests should be assessed.</p>	<p>Claimants in hardship are given additional assistance where appropriate.</p> <p>Claimants are less likely to fall into Council Tax arrears and have action taken against them through no fault of their own.</p> <p>Claimants do not suffer from unforeseen consequences arising from the change to the new scheme.</p>	<p>Sunita Ghudial</p>	
<p>To investigate opportunities to improve equality monitoring data in the future and to use this to inform decisions about scheme design in future years</p>	<p>To further improve the design of any future scheme based on additional data and impact analysis</p>	<p>Sunita Ghudial / Asha Vyas</p>	<p>April 2025 ongoing</p>
<p>To closely monitor the impacts of the new scheme on claimants; expenditure; Council Tax collection and age debt analysis and complaints and other indicators, particularly during the first year of operation</p>	<p>To further improve the design of the scheme in future years based on additional data and impact analysis.</p>	<p>Sunita Ghudial / Peter Cosgrove/Asha Vyas</p>	<p>April 2025 – March 2026 and ongoing</p>

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Sunita Ghudial
REVIEWING OFFICER: <i>* The manager with oversight of the</i>	Tom Pickup/Asha Vyas
Operational Director:	Thomas Cattermole

Appendix D – Scenarios

These examples are all based on Band D liability.

Scenario 1 – A lone parent with 2 dependants not-working and in receipt of Universal Credit.			
Under this proposal, their Council Tax Reduction would reduce by £10.25 per week			
Current Scheme		Proposed Scheme	
Weekly council tax liability	£29.29	Weekly council tax liability	£29.29
Weekly CTR entitlement	£29.29	Weekly CTR entitlement	£19.04
Weekly council tax to pay	£0.00	Weekly council tax to pay	£10.25

Scenario 2 – A couple on Disability Benefits (PIP) with 1 non dependant working (£100 per week).			
Under this proposal, their Council Tax Reduction would reduce by £23.67 per week			
Current Scheme		Proposed Scheme	
Weekly council tax liability	£39.05	Weekly council tax liability	£39.05
Weekly CTR entitlement	£29.05	Weekly CTR entitlement	£5.38
Weekly council tax to pay	£10.00	Weekly council tax to pay	£33.67

Scenario 3 – A lone parent working (£130 per week) with 2 dependants and in receipt of Universal Credit.			
Under this proposal, their Council Tax Reduction would reduce by £5.86 per week			
Current Scheme		Proposed Scheme	
Weekly council tax liability	£29.29	Weekly council tax liability	£29.29
Weekly CTR entitlement	£14.65	Weekly CTR entitlement	£8.79
Weekly council tax to pay	£14.65	Weekly council tax to pay	£20.50

Scenario 4 – Single person working (£100 per week) with 1 non-dependant student.			
Under this proposal, their Council Tax Reduction would reduce by £11.78 per week			
Current Scheme		Proposed Scheme	
Weekly council tax liability	£29.29	Weekly council tax liability	£29.29
Weekly CTR entitlement	£18.43	Weekly CTR entitlement	£6.65
Weekly council tax to pay	£10.86	Weekly council tax to pay	£22.64

This page is intentionally left blank

Council Tax Support – Consultation Report

1 Background to CTS and Consultation

Until 2013/14 Council Tax Benefit was a national scheme administered by Councils but fully funded by the Government. In 2013 the Government abolished the national scheme and asked Local Authorities to create their own local Council Tax Support (CTS) Schemes with reduced funding. Local CTS Schemes have to be reviewed annually and this report sets out recommendations following this year's review which was carried out within the context of the substantial financial challenges facing the Council.

Since 2010 central government grant to local authorities has been severely cut each and every year. Brent faces a significant challenge setting the budget for 2025/26 with a budget gap of c£16m, rising to c£30m by 2027/28. The Council must address this funding gap whilst demand for services, particularly social care for vulnerable children and adults, is continuing to rise.

As part of the review of the CTS Scheme, the level of potential savings that could be gained by changing the scheme was considered alongside the impact of a variety of options.

The proposals relate only to support for working age claimants (the support provided to pensioner claimants remain unchanged at nationally determined levels).

The options which were selected included making no changes and keeping the current scheme and a further six change options which could be implemented individually or in combination.

Any proposal to change the Council Tax Support Scheme requires the Council to consult with Greater London Authority (GLA) and also to undertake a public consultation exercise. Consultation has been held with the GLA and a public consultation and stakeholder was undertaken over the period 21 October 2024 to 15 December 2024.

2 Consultation Programme

A wide variety of methods were used as part of the Consultation process with the aim of ensuring the approach was inclusive of all groups including those claimants and non-claimants of CTS.

Overall, there were 397 responses to the consultation of which 176 were currently in receipt of CTS. Although the number of responses was low in comparison with the

volume of communications that were issued, this appears to be above the national response level experienced by the majority of Councils who have consulted since the introduction of CTS and is also a higher level than when the last CTS consultation was undertaken in 2019 when only 194 were received.

The Council followed best practice guidelines by undertaking an 8-week public and stakeholder consultation, between 21 October 2024 and 15 December 2024. Consultation activities included: -

- Questionnaire on Council website promoted via email and letter to all claimants, and all other residents.
- Direct engagement by email and letter with Brent Hub partners and CAB with offer to attend dedicated meetings with each organisation.
- Direct engagement by email and letter with partners with offer to attend dedicated meetings with each organisation.
- Drop-in sessions (in all 6 Libraries across the borough)
- Banners in Customer Service Centre and at events.
- Leaflets
- Stakeholder forums to obtain feedback and input from voluntary sector and community organisations.
- Mailbox set up for CTS-related comments and queries.
- Promoting consultation via auto reply message for Council Tax & CTS emails
- Direct engagement by attend Brent Connect meetings.
- Consultation published in the voluntary sector newsletter.
- Face to face engagement in the Customer Service Centre
- Staff engagement

Consultation with Key Stakeholders

Promotional emails/letters were sent to 16,833 customers and the Greater London Authority (GLA) as well as MP's and major advice agencies. Banners and leaflets placed in Libraries across the borough and the Civic Centre. Consultation was published in the newsletters by the voluntary sector. Emails sent to all Brent Hub Partners including Citizen Advice Bureau (CAB), offering briefing sessions to explain changes. Presentation on proposed changes were present at the Brent Connect meeting. Officers attended a disability event, leaflets on consultation were distributed at a Islamophobia awareness event. Customer contact via email for Council Tax and Council Tax Support services received an auto-reply message referring them to the consultation.

3 Consultation feedback

The data below shows the full consultation responses following the close of the consultation on 15 December. In total there were 397 responses via the survey on the Council's website, with some additional comments being received via the email account set up for queries.

The full graphs and tables of the consultation responses are contained in [Appendix A](#) and summarised here: -

Consultation responses on the proposed scheme changes

Proposed scheme changes	Agree or strongly agree	Disagree or strongly disagree
To remove the 100% reduction for out of work or low-income households and apply a percentage reduction to each of the other income bands.	32.7%	61.1%
Changes to the Council Tax Support non-dependant deductions (£8 deduction for non-dep in household out of work and £20 deduction for non-dep in household in work).	32%	57%
Limit Backdating to one month.	34%	49.2%
The introduction of an additional application process for Council Tax Support (Universal Credit applicants only).	33.3%	44.4%
Linking Income bands to Consumer Pricing Index (CPI)	30.7%	51.6%
Linking non-dependant charges to Consumer Pricing Index (CPI)	27.9%	48.7%

Of the total of 397 responses were received to the consultation which can be broken down into the respondent types as follows; -

Category	Number	%
Brent residents receiving CTS	176	43.8%
Brent residents not receiving CTS	226	56.2%

Responses on the design of the proposed scheme were generally disagreed with the proposals

4. Additional consultation comments

All additional comments received have been reviewed and summarised. The key themes emerging for each of the proposed options were as follows:

Question 1 - To remove the 100% reduction for out of work or low-income households and apply a percentage reduction to each of the other income bands.

Out of 397 responses, 115 respondents also left comments.

For the people that Agree or Strongly agree, the top themes that emerged were:

- **Reasonable** – *These respondents thought that the changes proposed were reasonable given the Council’s financial situation and need to make savings. These respondents in general thought that the scheme was generous and that it was a fair proposal to introduce a minimum contribution for all Council Tax Support recipients.*
- **Scheme Recommendations** – *Some respondents raised suggestions for the new scheme. These included: Reducing the top band to 80% instead of such a steep drop to 65% & reducing last band to 15% (instead of 20%), having council tax support as a monetary value (i.e. £) rather than a % reduction, including a vulnerable group to be exempt from 35% minimum contribution & including other income, capital or savings into the means testing (e.g. property, benefits income, etc.)*
- **Scheme still too generous** – *Some people agreed but thought the minimum contribution should be higher, for example, 50%.*

For the people that Disagree or Strongly disagree, the top themes that emerged were:

- **Financial Difficulties** – *These respondents thought that the changes proposed would cause them to fall into further financial difficulty. The cost-of-living struggle was frequently mentioned as well as an inability to pay the additional council tax that would be required. Many people raised concerns around their disability and the inability to find work or increase their income. Some answers highlighted that pushing residents into further financial difficulty could increase the demand on other council services and reduce the actual savings achieved by this change.*
- **Protecting the Vulnerable** – *Many respondents raised concerns around disabled residents, the elderly, carers, or parents all with a reduced ability to find employment and cover the council tax shortfall that will be created because of this change to their support. These answers raised worries that this scheme change would affect those on a low-income unfairly and expects those with the lowest income to find spare income that doesn’t exist. Responses highlighted that people were already struggling and this change would only serve to exacerbate their struggle.*
- **Unfair** – *These replies often highlighted that they thought it was unfair to target those in receipt of Council Tax Support who have low-incomes already and an inability to pay council tax often being carers, disabled or in receipt of benefits only. Some answers highlighted that the people receiving this support are already on the poverty line and this change*

could push people into poverty. Some respondents believed that the change would breach Discrimination & Human Rights & Equality Laws.

- **Find savings elsewhere** – These answers highlighted the need for the council to find the savings from somewhere else. Some of the reasons given were that this change would be potentially more costly in the long run due to increased demand on council services or increased outstanding debt. These responses raised that the changes were targeting individuals who don't have the means to contribute more, and many suggestions were received to look to the wealthier residents within the borough for savings. Other suggestions included: advocating for more equitable funding from central government, finding efficiencies in other areas of spending, increase income rather than cut services, targeting outstanding debt/fraud or council tax evasion or reducing Brent employee salaries.

Question 2 - Changes to the Council Tax Support non-dependant deductions (£8 deduction for non-dep in household out of work and £20 deduction for non-dep in household in work).

Out of 397 responses, 88 respondents also left comments.

For the people that Agree or Strongly agree, the top themes that emerged were:

- **Fair** – These respondents thought that it was fair to ask non-dependants to contribute towards household bills including Council Tax and sensible to look at household income as a total rather than only the income of a claimant or partner.
- **Simpler** – Comments highlighted that a two flat-rate deduction system is an improvement on the previous system and would be simpler or easier for residents to understand.
- **Unfair** – Whilst these people agreed with the proposal, they believed in general that the £20 deduction for working non-dependants was fair whereas the £8 deduction for non-working was too much of an ask.
- **Scheme Recommendations** – These comments made suggestions to not take non-dependant deductions for students.

For the people that Disagree or Strongly disagree, the top themes that emerged were:

- **Financial Difficulties** – These respondents thought that the charges proposed were too much of an increase especially considering the current cost of living. Some people highlighted that £20/week for a working non-dependant would be over £1000 per annum and a

significant portion of the Council Tax bill. These respondents highlighted that this change would not be affordable, further push families into poverty or struggle and that this change would hit the poorest.

- **Unfair** – *Some of the suggestions received thought that the £8 deduction was too much for non-dependants that are not working, disabled or students. Some people believed that deductions for working non-dependants should be means tested & based on their income level, with higher earners contributing more.*
- **Find savings elsewhere** – *These comments suggested that Brent look to other ways of making the savings or cutting costs. These included looking at efficiency savings within the council, increasing fines for parking penalties/littering/anti-social behaviour etc. or empty property rates.*

Question 3 - To what extent do you agree or disagree with the Council's proposal of limiting backdating of claims to one month.

Out of 397 responses, 81 respondents also left comments.

For the people that Agree or Strongly agree, the top themes that emerged were:

- **Fair** – *Many respondents agree with limiting backdating to one month, citing fairness and cost-effectiveness. Several comments highlight the importance of timely applications by claimants and suggest it is reasonable to expect individuals to apply promptly.*
- **Simpler** – *Some comments highlighted that this was an improvement upon previous rules and that it would be both cheaper for the council and easier for claimants to understand.*
- **Scheme Recommendations** – *Some comments emphasize that backdating should only be restricted if the council improves support and communication to ensure people are aware of their responsibilities and deadlines. A few respondents mentioned that delays caused by council inefficiency should still allow backdating to the date of application.*

For the people that Disagree or Strongly disagree, the top themes that emerged were:

- **Scheme Recommendations** – *Many comments suggest that one month is insufficient, advocating for longer periods such as 3 months, 6 months, or even a year. This is based on fairness and accommodating individual circumstances like being in the hospital, caring responsibilities, or lack of awareness. Several comments mention that*

the council delays should not negatively affect claimants. A recurring concern is the lack of information about available support. Some respondents feel that limited awareness of Council Tax Support contributes to delayed applications.

- **Protect The Vulnerable** – *Many respondents argue that limiting backdating to one month is unfair, especially for individuals who face barriers such as disabilities, illness, language difficulties, or lack of digital skills. Vulnerable groups mentioned include elderly non-pensioners, non-English speakers, individuals with mental health challenges, and those facing homelessness.*
- **Financial Difficulties** – *Comments suggest limiting backdating could exacerbate financial difficulties for residents already struggling to make ends meet. Respondents highlight that a one-month backdating limit would place undue stress on those with low incomes, pushing some into debt or forcing them to choose between essentials like food and energy. Some respondents suggest the council should provide alternative options to mitigate the financial challenges faced by residents.*

Question 4 - To what extent do you agree or disagree with the Council's proposal of the introduction of an additional application process for Council Tax Support (Universal Credit applicants only)

Out of 397 responses, 82 respondents also left comments.

For the people that Agree or Strongly agree, the top themes that emerged were:

- **Fair** – *Many respondents support simplifying the process to ensure it is more efficient, cost-effective, and fair. Respondents highlight the need to improve awareness of available support and emphasize that some people are unaware they must apply separately for Universal Credit (UC) and Council Tax Support. Some respondents raise concerns that implementing these changes might increase bureaucracy and require additional staff, leading to higher administrative costs.*
- **Unclear** – *While there is strong support for automating the process to reduce stress and improve efficiency, there is scepticism about whether this approach will lead to increased bureaucracy or administrative burdens for the council. Effective use of IT systems is emphasized as a key solution.*

For the people that Disagree or Strongly disagree, the top themes that emerged were:

- **Unclear** – *Upon reviewing the comments we have noticed that many respondents may not have fully understood this proposal and that the introduction of an additional application process would not require more*

administration on behalf of claimants and would be an automated process.

Therefore, claimants raised that introducing another application process is unnecessary and adding more forms and steps would be redundant and counterproductive. There is scepticism about whether this change will lead to cost savings, with some suggesting it may increase overall expenses due to higher administrative demands and potential increases in claims. Many propose incorporating the council tax application into the existing UC process or automating the system entirely to avoid duplication and simplify the process for everyone involved. Some respondents view the proposal as a deliberate tactic to make it harder for people to access support, creating unnecessary barriers and hurdles.

- **Unfair** – Many believe the proposal may breach Human Rights, Equality, and Anti-Discrimination laws, as it disproportionately impacts vulnerable groups, particularly individuals on Universal Credit (UC) or with disabilities. Respondents' express frustration with an already arduous and stressful system. Adding another form or step is viewed as unnecessarily increasing stress and complexity, particularly for those already dealing with challenging personal circumstances.
- **Protect the vulnerable** – Adding more forms or processes creates unnecessary barriers for disabled people who already face significant challenges, often without receiving additional financial support. Respondents emphasize the need for more accessible processes and support to achieve "true fairness" for vulnerable groups.

Question 5 - To what extent do you agree or disagree with the Council's proposal of linking Income bands charges to CPI (inflation)

Out of 397 responses, 68 respondents also left comments.

For the people that Agree or Strongly agree, the top themes that emerged were:

- **Fair** – Several comments agree that the proposal is fair and reasonable. One comment suggests that growth in earnings, rather than price inflation, would be a more appropriate measure. Respondents support the idea of linking changes to some form of inflation, whether it's price or another factor.

For the people that Disagree or Strongly disagree, the top themes that emerged were:

- **Financial Difficulties** – Linking income bands to CPI is criticized as disproportionately impacting low- and middle-income households, who already struggle with rising costs of essentials like food, housing, and

energy. Minor income increases for low earners often fail to keep pace with inflation, pushing them out of eligibility for support without significantly improving their financial situation. Many argue that this approach would exacerbate debt, poverty, and homelessness, which are far more costly to address than preventive measures like housing support. Inflation-adjusted income bands fail to reflect the real cost-of-living pressures faced by low-income groups, where wages often do not align with CPI increases.

- **Unfair** – The proposed measures are seen as particularly unfair to low-income workers whose wages do not increase with inflation. Many of them, like cleaners, cannot raise their prices without risking job loss, making the proposal seem inequitable. There's a call for the council to reduce its own spending instead of burdening citizens further.
- **Unclear** – Respondents highlighted the need here for further explanation and overall respondents may have misunderstood this proposed change that would effectively increase the number of eligible claimants or amount of support available. Inflation is seen as unpredictable and volatile, adding to the uncertainty of the economic situation, and making it difficult for individuals to plan financially.

Question 6 - To what extent do you agree or disagree with the Council's proposal of linking the non-dependant charges to CPI (inflation)

Out of 397 responses, 51 respondents also left comments.

For the people that Agree or Strongly agree, the top themes that emerged were:

- **Fair** – Many agree that the proposed charges are fair, with some emphasizing that tying charges to inflation is reasonable and justifiable. A recurring concern is the high cost of charges, with some expressing that the financial burden is too expensive.

For the people that Disagree or Strongly disagree, the top themes that emerged were:

- **Unfair** – There is concern that CPI-linked charges could impose unsustainable financial burdens on those already struggling, such as low-wage earners, part-time workers, or the unemployed. There's a sense that people who have contributed to the system for years should not be penalized when they fall on hard times. The council's approach is criticized as being unhelpful and unfair, with some suggesting it will increase debt and poverty.

- **Scheme recommendations** – *There is a call for a more equitable system that assesses actual income and circumstances, rather than automatically increasing charges based on CPI. Comments suggest that charges should be set annually based on individual circumstances, rather than being automatically linked to inflation. There are suggestions to end non-dependant charges except for in-work individuals.*
- **Financial difficulties** – *This approach is seen as exacerbating financial pressures and creating tension within households. Many express the view that increasing charges in this manner would further strain already struggling households, forcing people to make sacrifices in essential areas like food and energy. There is a strong sense of frustration with the council's actions, with some seeing it as another attempt to make money from those who can least afford it.*

Question 7 - Do you have any other comments on the proposed changes to the Council Tax Support scheme?

Out of 397 responses, 113 respondents also left comments.

There was no option here to Agree/Disagree only a free text box to submit comments. Out of the comments received, the top themes that emerged were:

- **Scheme recommendations** – *Many comments express strong opposition to proposed changes, arguing that reducing council tax support for the poorest residents will exacerbate financial struggles. The 100% discount for low-income households should be maintained to protect vulnerable individuals, including those with disabilities, full-time carers, and low-income working families. Some respondents highlight the large amount of council tax arrears in 2023/24 and question how much of this is due to poverty and an inability to pay. Concerns are raised about whether reducing support will lead to a further increase in arrears or a higher demand for assistance from the Resident Support Fund. There are suggestions to save money by addressing inefficiencies within the council, such as cutting wasteful spending or reducing the number of unnecessary staff. Some also advocate for raising taxes for wealthier individuals, landlords, or property developers, rather than penalizing low-income residents. Some suggest introducing a tapering system like Universal Credit, where council tax liabilities increase gradually as income rises, reducing the sudden financial burden caused by small income increases.*
- **Financial Difficulties** – *Many argue that reducing support will push already vulnerable groups into deeper financial difficulty. This includes people on low wages, disabled individuals, and those relying on benefits. These respondents highlight that the cuts could lead to severe*

consequences, including homelessness, worsened health, and increased reliance on other public services, such as the NHS.

- **Unfair** – Critics believe the changes unfairly target those who can least afford it. They suggest that property owners and landlords, who are more financially able, should be taxed more heavily, rather than penalizing low-income individuals. Several comments point out that reducing support at a time when people are already struggling with rising costs and bills is unfair. There's a call to delay these changes, particularly during the ongoing cost of living crisis.
- **Protect the vulnerable** – Several individuals express concern that people with disabilities, those on PIP, and full-time carers should not be expected to contribute 35% of their council tax. Some respondents highlight the negative impact on families, particularly single-parent households, and children. The proposed cuts to council tax support could result in a significant loss of income, potentially pushing families into deeper poverty, with adverse effects on children's well-being.
- **Unhappy With Council Services** - Multiple responses criticize the council for its inability to manage finances properly, suggesting that resources should be allocated more efficiently.

More detail can be found in [Appendix B](#). Some comments made by respondents raised several remarks therefore have been categorised under multiple themes where appropriate. If request a full list of all the comments can be provided. If requested, a full breakdown of all comments received can be provided.

In addition to resident's responses, we received feedback from Citizen Advice Bureau and the GLA.

Citizens Advice Bureau comments

Citizens Advice conducted a flash survey of 32 working age Brent Residents in receipt of CTS. A summary of their response is outlined below, with the full response detailed in [Appendix C](#).

Key Findings

- The average council tax bill increases for the CTS claimants that were surveyed was £524.98.
- 13 out of 32 CTS claimants surveyed did not have enough income to cover their monthly costs, despite receiving the maximum level of CTS.
- 2 in 3 CTS claimants surveyed will receive a new or increased council tax bill that they currently do not have the monthly income to pay.

Recommendations proposed:

- Reduce the minimum Council Tax payment of 35% - Deemed to be one of the highest in the UK.

- Use existing protections for financially vulnerable residents claiming CTS – Eligibility for CTS is in and of itself evidence of some level of financial vulnerability, and this should be taken into consideration wherever the council considers initiating enforcement action.
- Make greater use of the Council Tax Discretionary Reduction Policy to assist the most financially vulnerable residents.
- The council should refine and promote other forms of support that may offer help to residents struggling with their council tax bills.
- The council should consider retaining the current backdating rules, in which claims can be backdated to the start of the financial year in cases where there has been a good reason for claimants to have delayed making an application.

The question asked by CAB:

- Clarify the rules on backdating CTS claims and allow for circumstances in which CTS should be backpaid for more than one month.

GLA Comment

The GLA was informed and provided with the CTS consultation paper on 18 October 2024, ahead of its release for public consultation with Brent residents. A summary of their response is outlined below, with the full response detailed in [Appendix D](#).

GLA response to proposed changes:

- The GLA acknowledges Brent faces financial challenges in designing its Council Tax Support (CTS) scheme, particularly given demographic pressures and rising service costs.
- Proposed changes would require many residents to pay at least 35% of their council tax liability, potentially increasing administrative challenges and household debt.
- The GLA recommends a thorough analysis of household ability to pay and socio-economic impacts to optimize revenue and minimize non-payment risks.
- Brent plans to review its hardship fund policy, with support accessible via its website, and has asked the mayor to contribute to the fund, with a response expected in the New Year.

Providing Information on Schemes

- The GLA supports Brent's publication of scenarios illustrating the impact of CTS changes on households and urges this practice for the final scheme before March 2025.
- It recommends detailed analysis of household ability to pay using reliable methodologies and platforms. Additionally, the Council should provide a clear breakdown of expected costs and savings from the final scheme to ensure transparency for residents, taxpayers, and stakeholders.

Setting the Council Tax Base for 2025-26 and Assumptions in Relation to Collection Rates

- The Council must set a council tax base for 2025-26, considering potential impacts from changes to its council tax support scheme, empty homes policy, and new powers on second homes.
- It will also need to forecast collection rates from affected taxpayers.
- The GLA urges the Council to share an indicative tax base forecast with supporting calculations as soon as options are presented, to inform the mayor's 2025-26 budget planning for police, fire, and other services.

Respondents were asked to provide their equality characteristics data, which is captured on [Appendix A](#).

This page is intentionally left blank

Appendix E (Part 2)

Council Tax Support Scheme 2025/26

Consultation Responses

18 October 2024 - 15 December 2024

To what extent do you agree or disagree with the Council's preferred option of updating the current scheme and increasing the minimum contribution required from working age recipients to 35%?

397/397 - Multiple choice - choose many - required

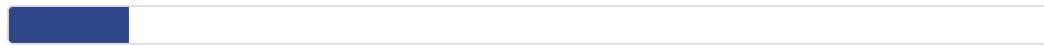
Strongly disagree 49.5% (201 choices)



Strongly agree 21.9% (89 choices)



Disagree 11.6% (47 choices)



Agree 10.8% (44 choices)



Neither Agree nor Disagree 6.2% (25 choices)



No answer 0% (0 choices)



To what extent do you agree or disagree with the Council's preferred option of introducing two flat rate non-dependant deductions for most households with other adults living in the property, £8 per week for non-dependants who are "out of work" (including full-time students) and £20 per week for non-dependants who are "in work".

397/397 - Multiple choice - choose many - required

Strongly disagree 42.5% (170 choices)



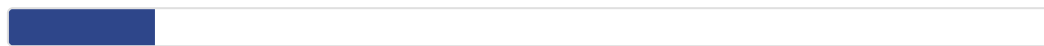
Strongly agree 18% (72 choices)



Disagree 14.5% (58 choices)



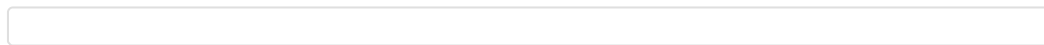
Agree 14% (56 choices)



Neither Agree nor Disagree 11% (44 choices)



No answer 0% (0 choices)



To what extent do you agree or disagree with the Council's proposal of limiting backdating of claims to one month.

397/397 - Multiple choice - choose many - required

Strongly disagree 34.7% (141 choices)



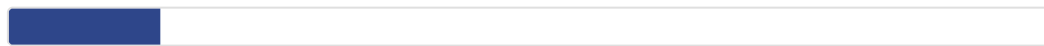
Strongly agree 19.7% (80 choices)



Neither Agree nor Disagree 16.7% (68 choices)



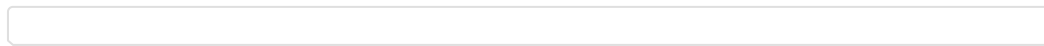
Disagree 14.5% (59 choices)



Agree 14.3% (58 choices)



No answer 0% (0 choices)



To what extent do you agree or disagree with the Council's proposal of the introduction of an additional application process for Council Tax Support (Universal Credit applicants only)

397/397 - Multiple choice - choose many - required

Strongly disagree 32.1% (129 choices)



Neither Agree nor Disagree 21.1% (85 choices)



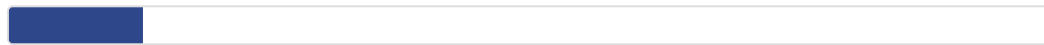
Strongly agree 20.4% (82 choices)



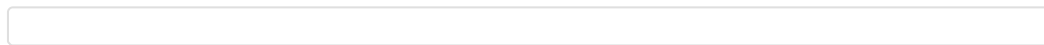
Disagree 13.4% (54 choices)



Agree 12.9% (52 choices)



No answer 0% (0 choices)



5. To what extent do you agree or disagree with the Council's proposal of linking Income bands charges to CPI (inflation)

397/397 - Multiple choice - choose many - required

Strongly disagree 35.6% (144 choices)



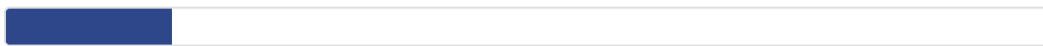
Agree 18.8% (76 choices)



Neither Agree nor Disagree 17.8% (72 choices)



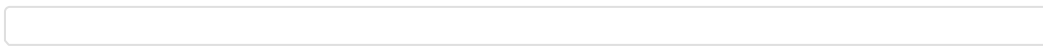
Disagree 16% (65 choices)



Strongly agree 11.9% (48 choices)



No answer 0% (0 choices)



To what extent do you agree or disagree with the Council's proposal of linking the non-dependant charges to CPI (inflation)

397/397 - Multiple choice - choose many - required

Strongly disagree 32.7% (131 choices)



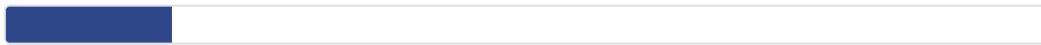
Neither Agree nor Disagree 23.4% (94 choices)



Agree 16.7% (67 choices)



Disagree 16% (64 choices)



Strongly agree 11.2% (45 choices)



No answer 0% (0 choices)



Which best represents you

397/397 - Multiple choice - choose many - required

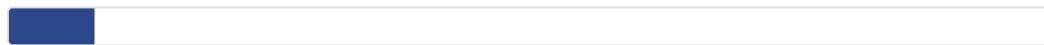
Responsible for the Council Tax bill 62.1% (288 choices)



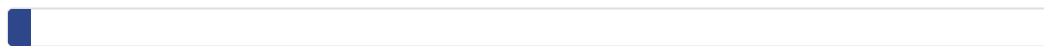
Receiving Council Tax Reduction 27.6% (128 choices)



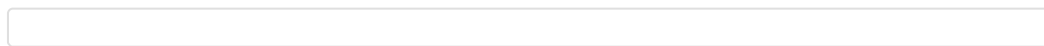
Other 8.2% (38 choices)



Voluntary organisation / advisory service 2.2% (10 choices)



No answer 0% (0 choices)



Are you currently in receipt of Council Tax support?

397/397 - Multiple choice - choose many - required

No 56.2% (226 choices)



Yes 43.8% (176 choices)



No answer 0% (0 choices)



Your age?

397/397 - Multiple choice - choose many - required

31 - 40 24.9% (100 choices)



41 - 50 24.9% (100 choices)



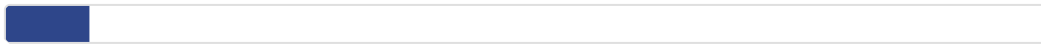
51 - 60 22.6% (91 choices)



60 + 14.2% (57 choices)



Prefer not to say 8% (32 choices)



22 - 30 5.2% (21 choices)



Under 18 0.2% (1 choice)



18 - 21 0% (0 choices)



No answer 0% (0 choices)



What is your sex ?

397/397 - Multiple choice - choose many - required

Female 50.4% (201 choices)



Male 38.3% (153 choices)



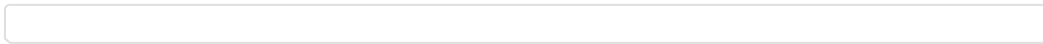
Prefer not to say 11% (44 choices)



Other 0.3% (1 choice)



No answer 0% (0 choices)



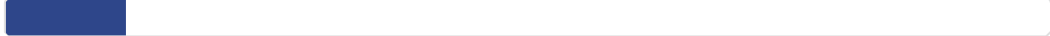
Is the gender you identify with the same as your sex registered at birth?

397/397 - Multiple choice - choose many - required

Yes 88.2% (351 choices)



Prefer not to say 11.6% (46 choices)



No 0.3% (1 choice)



No answer 0% (0 choices)



Your ethnic group?

397/397 - Multiple choice - choose many - required

White - British (English, Welsh, Scottish, Northern Irish) 23.2% (96 choices)



Prefer not to say 20.3% (84 choices)



Asian/ Asian British / Indian 12.3% (51 choices)



White European 9.2% (38 choices)



Black/ Black British/ African 7.7% (32 choices)



Black/ Black British/ Caribbean 7.5% (31 choices)



Other Ethnic Group 3.9% (16 choices)



Any Asian Other 3.4% (14 choices)



White Other 3.4% (14 choices)



Asian/ Asian British/ Pakistani 3.1% (13 choices)



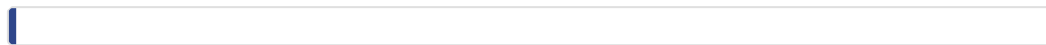
Arab 2.2% (9 choices)



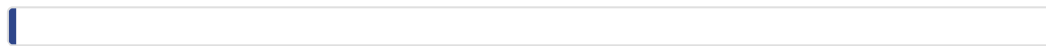
Any other Mixed or multiple ethnic background 1.2% (5 choices)



White and Black African 0.7% (3 choices)



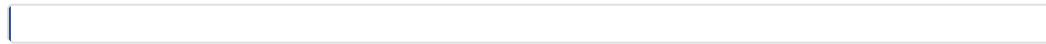
Any Black Other 0.7% (3 choices)



White and Black Caribbean 0.5% (2 choices)



Asian/ Asian British / Chinese 0.2% (1 choice)



White and Asian 0.2% (1 choice)



No answer 0% (0 choices)



Your religion or belief?

397/397 - Multiple choice - choose many - required

Christian 25.9% (105 choices)



Prefer not to say 25.2% (102 choices)



No religion 23.7% (96 choices)



Muslim 13.1% (53 choices)



Hindu 7.4% (30 choices)



Jewish 3% (12 choices)



Buddhist 0.7% (3 choices)



Any other religion or belief 0.7% (3 choices)



Sikh 0.2% (1 choice)



Which of the following best describes your sexual orientation?

397/397 - Multiple choice - choose many - required

Heterosexual / straight 67.9% (277 choices)



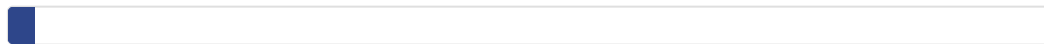
Prefer not to say 24.5% (100 choices)



Gay or Lesbian 4.7% (19 choices)



Bisexual 2.5% (10 choices)



Other sexual orientation, prefer to self-describe 0.5% (2 choices)



No answer 0% (0 choices)



Gender



• Unknown • Male • Female • Other

This page is intentionally left blank

Appendix E (Part 3)

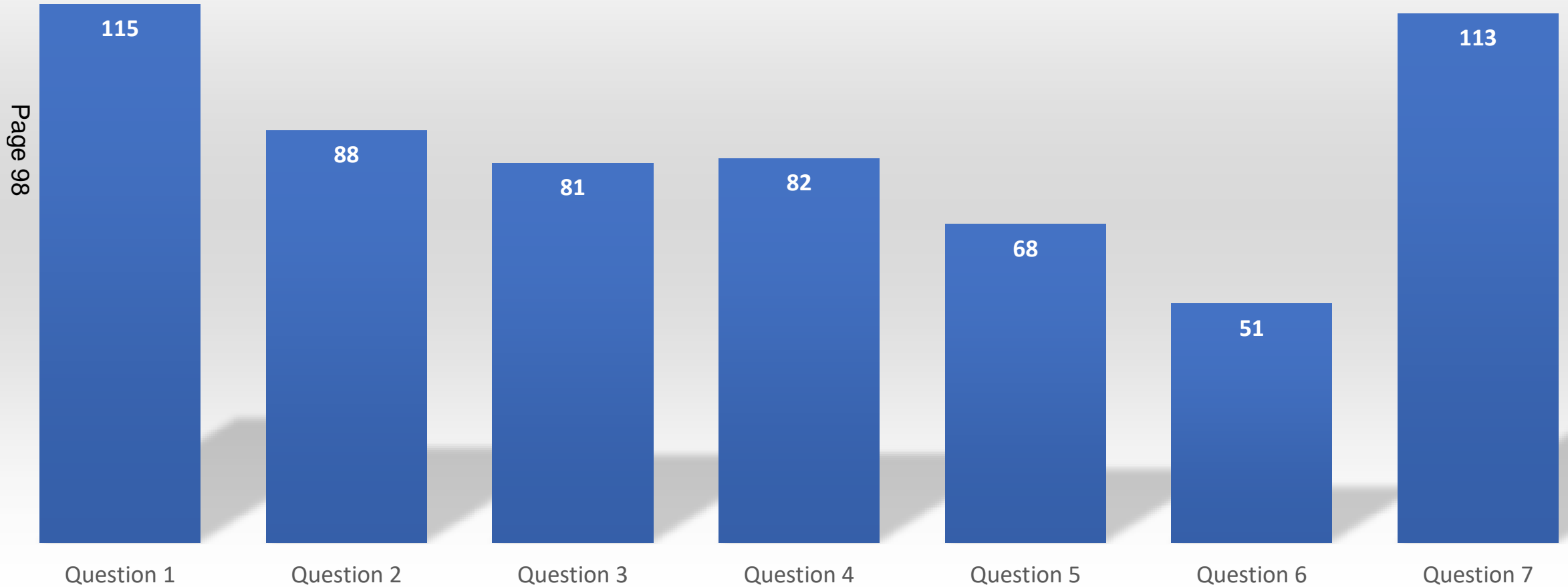
Council Tax Support Scheme 2025/26

Consultation Comments

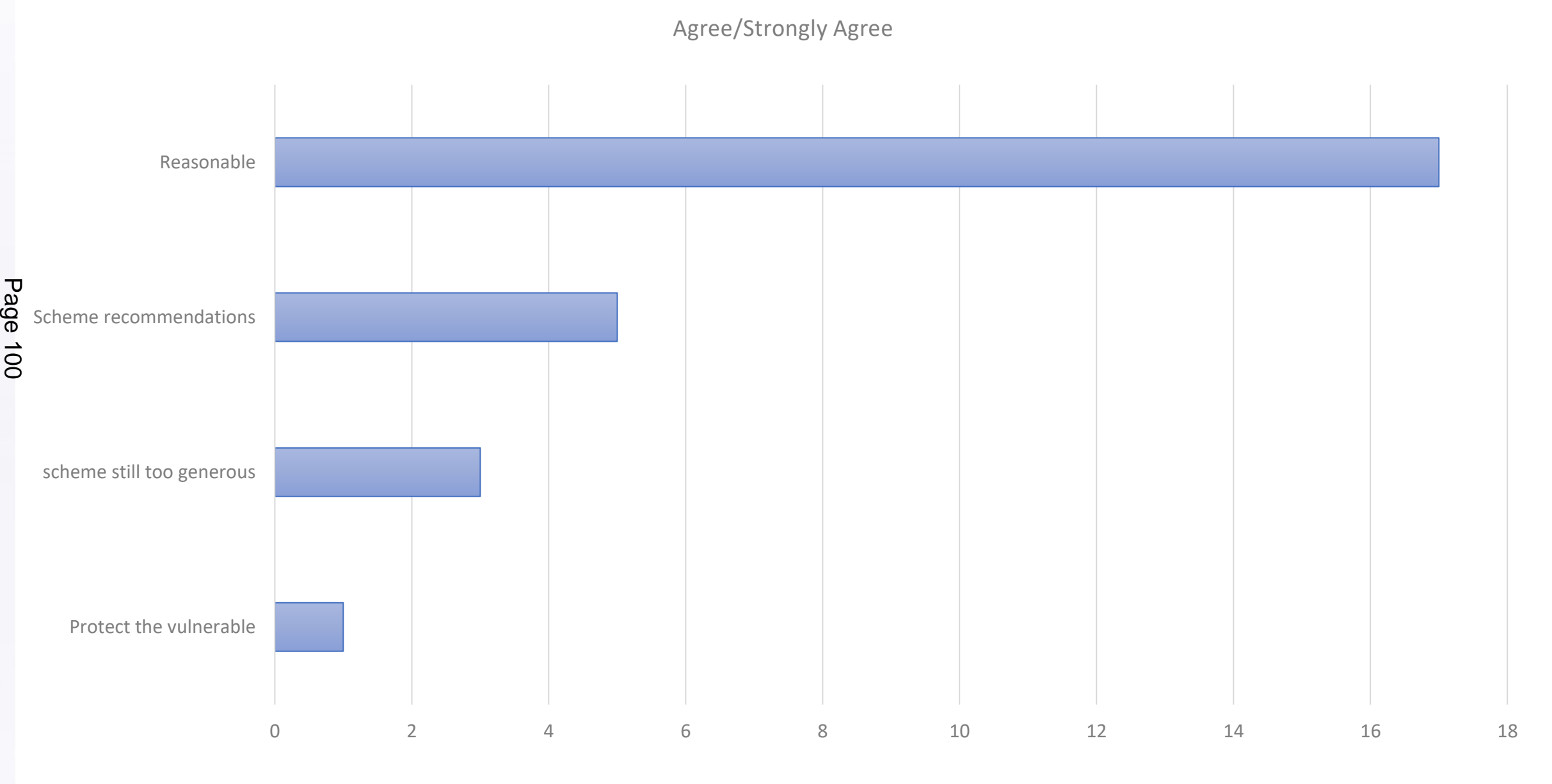
December 2024

598 Total comments received

Number of comments received by question



Out of those respondents that 'Agree' or 'Strongly Agree' with this proposal these were the common themes that emerged:



Out of those respondents that 'Agree' or 'Strongly Agree' with this proposal these were some comments we received:

I think everyone living and benefiting from any service provided by the council should pay council tax and I strongly support setting up a minimum contribution

Even with these changes the support scheme is far too costly. The fact that "Brent has created one of the most generous Council Tax Support Schemes in London" when the council is in dire financial straits shows this scheme is unsustainable.

The council needs the money and everyone should contribute

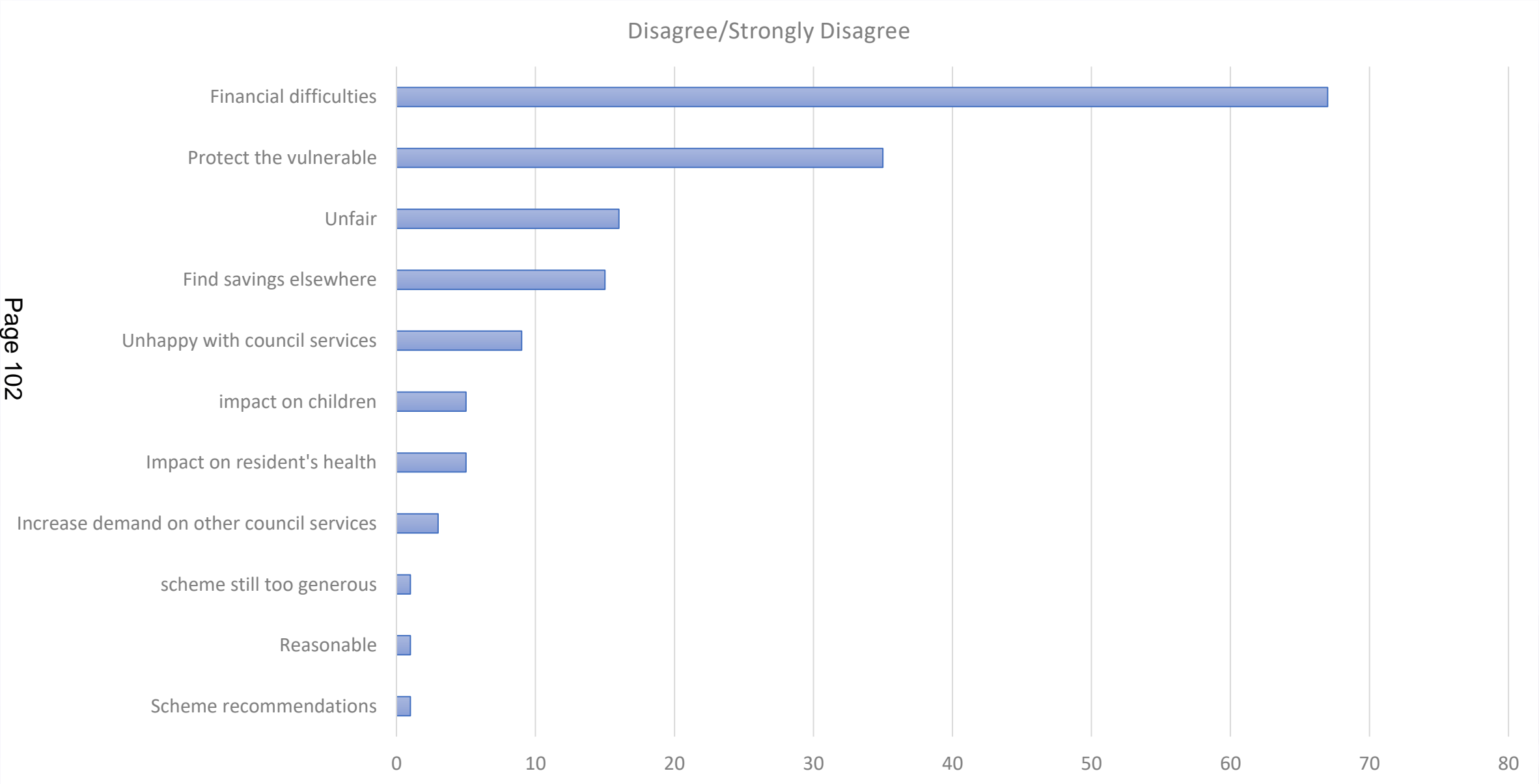
I think you should also take into account wealth - e.g. property ownership - and any benefits received

It's only fair that if others are being affected by price increases that those who get support do too. We can't go one like this - supporting people when our pockets are being squeezed in all directions.

Some non-working people have other income and savings they can use to pay their bills.

It seems a fair way of cutting back. Still helping the more vulnerable

Out of those respondents that 'Disagree' or 'Strongly Disagree' with this question these were the common themes that emerged:



Out of those respondents that 'Disagree' or 'Strongly Disagree' with this proposal these were some comments we received:

Working age recipients who cannot work as they are physically disabled, how is this a fair system??

35% would result in a bill of around £500-£550 per year. Where is that money going to come from when state benefits are paid at fixed rates and isn't exactly generous. All the council will be doing is pushing me and others on very low fixed incomes, into increased poverty.

no one has the money

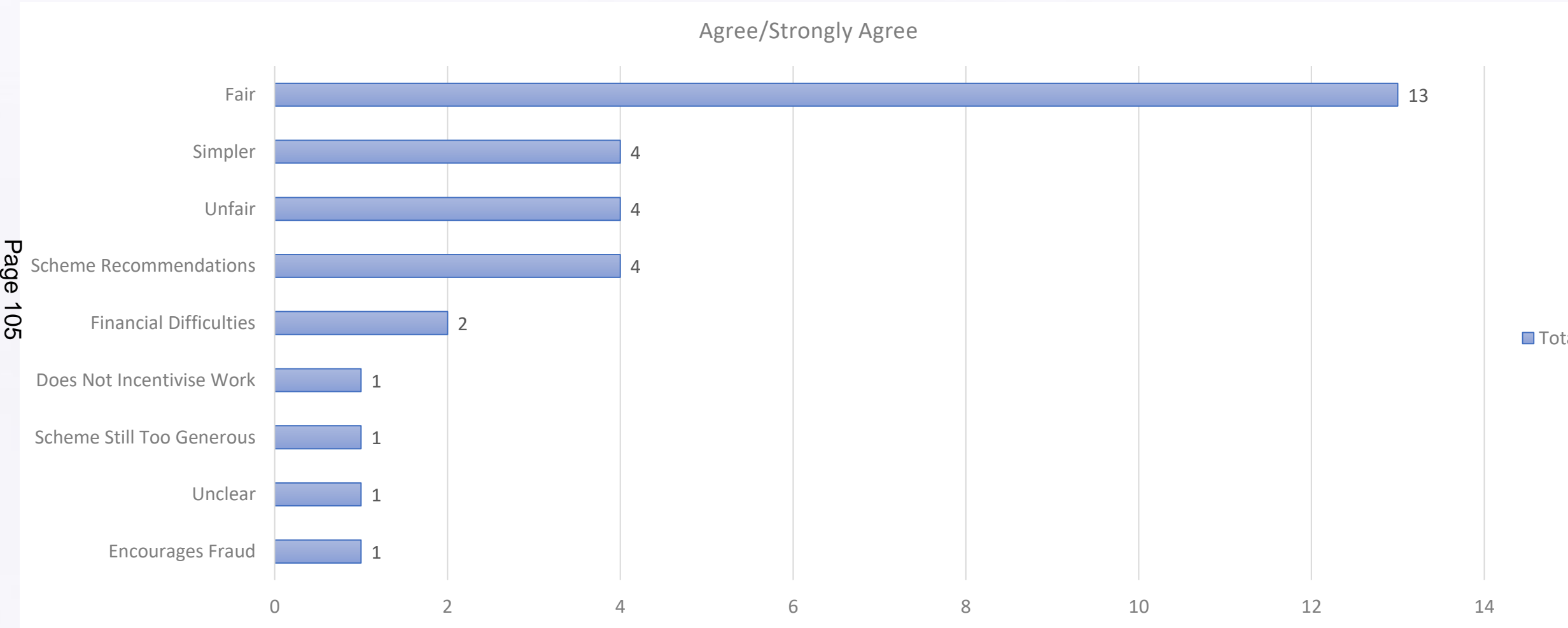
This will cause unnecessary hardship at a time when people are struggling expediently this needs to be reconsidered

People who receive council tax benefit do so because they can't afford to pay the fee. It makes no sense to try to extract money from an individual who doesn't have the funds. You'd be wasting time and money in the process.

This appalling. You're supposed to be Labour but you're penalising the poorest.

People are already struggling with bills and council tax bills to go up is high detrimental!!

Out of those respondents that 'Agree' or 'Strongly Agree' with this proposal these were the common themes that emerged:



Out of those respondents that 'Agree' or 'Strongly Agree' with this proposal these were some comments we received:

Having this makes it more streamlined and easier to manage and saves the money required where it is sensible to do from.

I agree with the £20 non dependant deduction for those who work but feel £8 is a lot for those who can't work due to an illness or disability

young people should pay council tax

A pound adjustment is easier to understand and explain. The percentage discount should be ditched in favour of a pound discount.

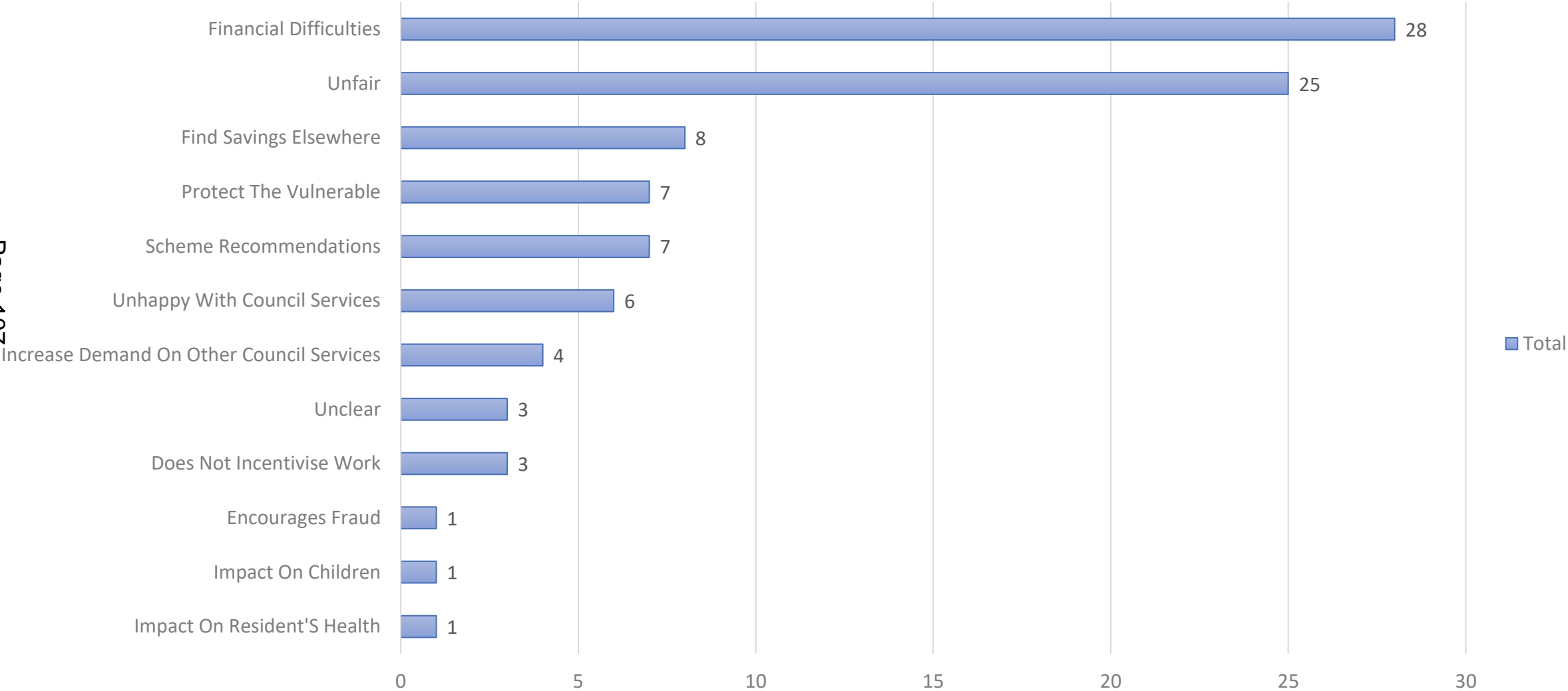
This is an improvement, but the system needs a complete overhaul. If a household has a working adult, then there should be zero Council Tax Support, and the full tax rate should apply

This is a fair ask, as ND's who are working need to contribute

Please consider how this is inherently encouraging people to stay out of work and / or take on 'cash in hand' jobs

Out of those respondents that 'Disagree' or 'Strongly Disagree' with this question these were the common themes that emerged:

Disagree/Strongly Disagree



Out of those respondents that 'Disagree' or 'Strongly Disagree' with this proposal these were some comments we received:

Not everyone is getting same income - so it would be unfair that someone with lower incomes pay same as someone with high income

The proposed contributions will not only lead to heightened financial stress but could also push vulnerable households into further debt and hardship. This strain on mental and physical health may result in greater reliance on public services in the long term, counteracting any intended benefit from this proposal.

it will hit the poorest

£8 per week from £90 is a sizeable chunk considering the CoL isn't reducing greatly. £5-6 would seem more reasonable.

This is absolutely crazy. Far too expensive and will cost you more to police it than what you'd recoup! Those with additional people living in the property are living together because they are poor. You'd be taking the poorest

Students are in enough debt already; they should not be forced to contribute to council tax.

This is too big a change and even a smaller amount will be the start of a slippery slope so it will be increased in future years.

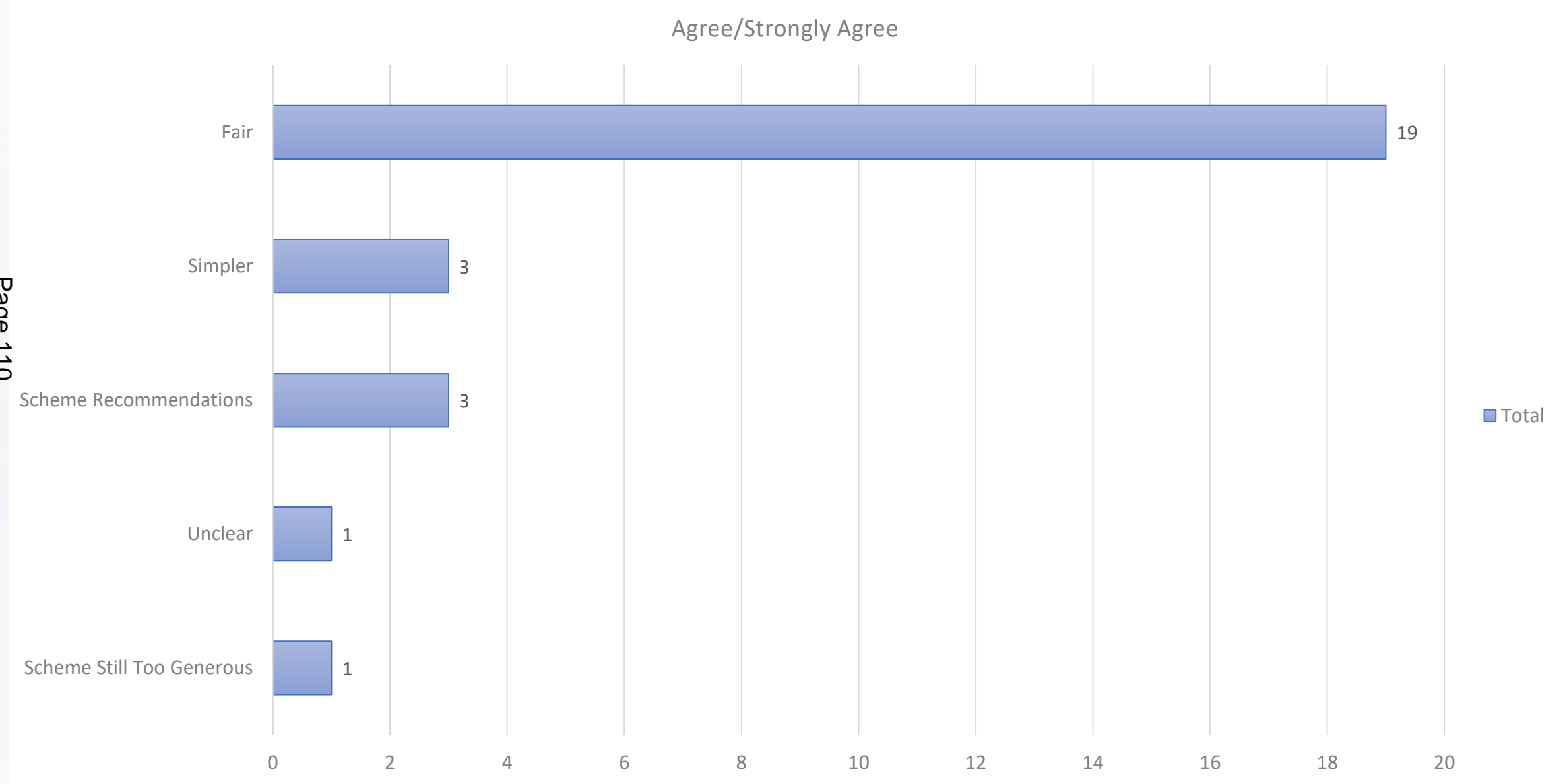
Question 3

To what extent do you agree or disagree with the Council's proposal of limiting backdating of claims to one month.

These were the words that were frequently found in customers responses to question one:



Out of those respondents that 'Agree' or 'Strongly Agree' with this proposal these were the common themes that emerged:



Out of those respondents that 'Agree' or 'Strongly Agree' with this proposal these were some comments we received:

Backdating claims is very very expensive for the council to keep up with, it's the tenant's responsibility to make an application as soon as they realise that their circumstances has changed

I agree with this in light of the fact that there will be an automatic invitation to UC claimants to apply for C Tx support, rather than requiring people to know about the scheme and have the wherewithal to apply.

There should be no back dating at all.

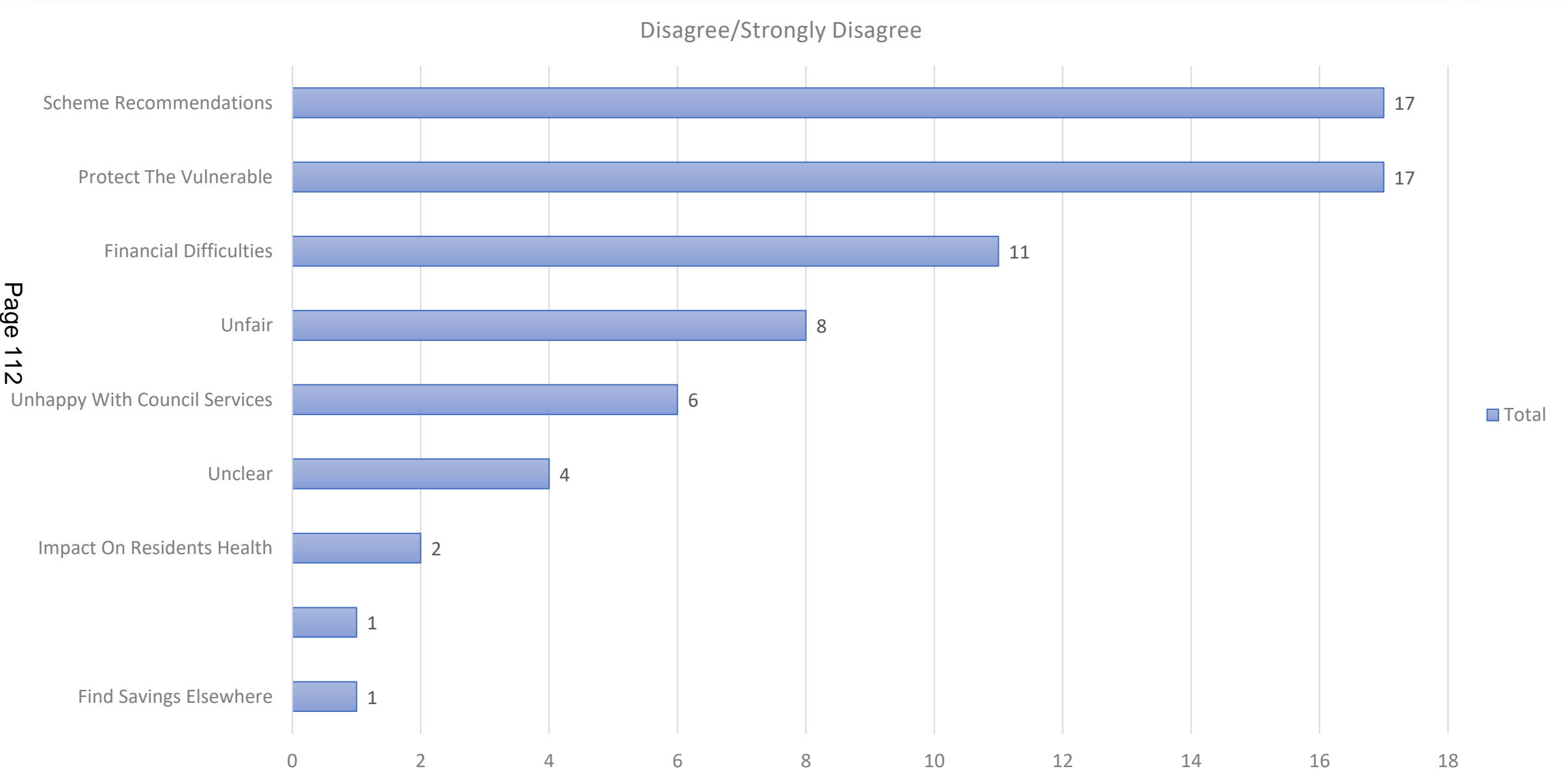
I agree, but wish it could be 2 months bearing in mind difficulties in receiving benefits.

with the caveat that this is properly marketed and advertised to the community and that people are clear on when and how they should claim

it will allow to free up resources a council hence saving money

Cheaper to administer, easier to understand.

Out of those respondents that 'Disagree' or 'Strongly Disagree' with this question these were the common themes that emerged:



Out of those respondents that 'Disagree' or 'Strongly Disagree' with this proposal these were some comments we received:

Most of the time people don't know they can apply for discount. So, it's fair to get 3 month back as LA don't share easily any information regarding possibility of financial help

You will make it harder for people already struggling. They will have to find this deficit from elsewhere (be it food, energy etc.) Sometimes people fall on hard times - after contributing and paying tax for a very long time! Do not kick people when they are down.

Limited backdating of claim should be three months

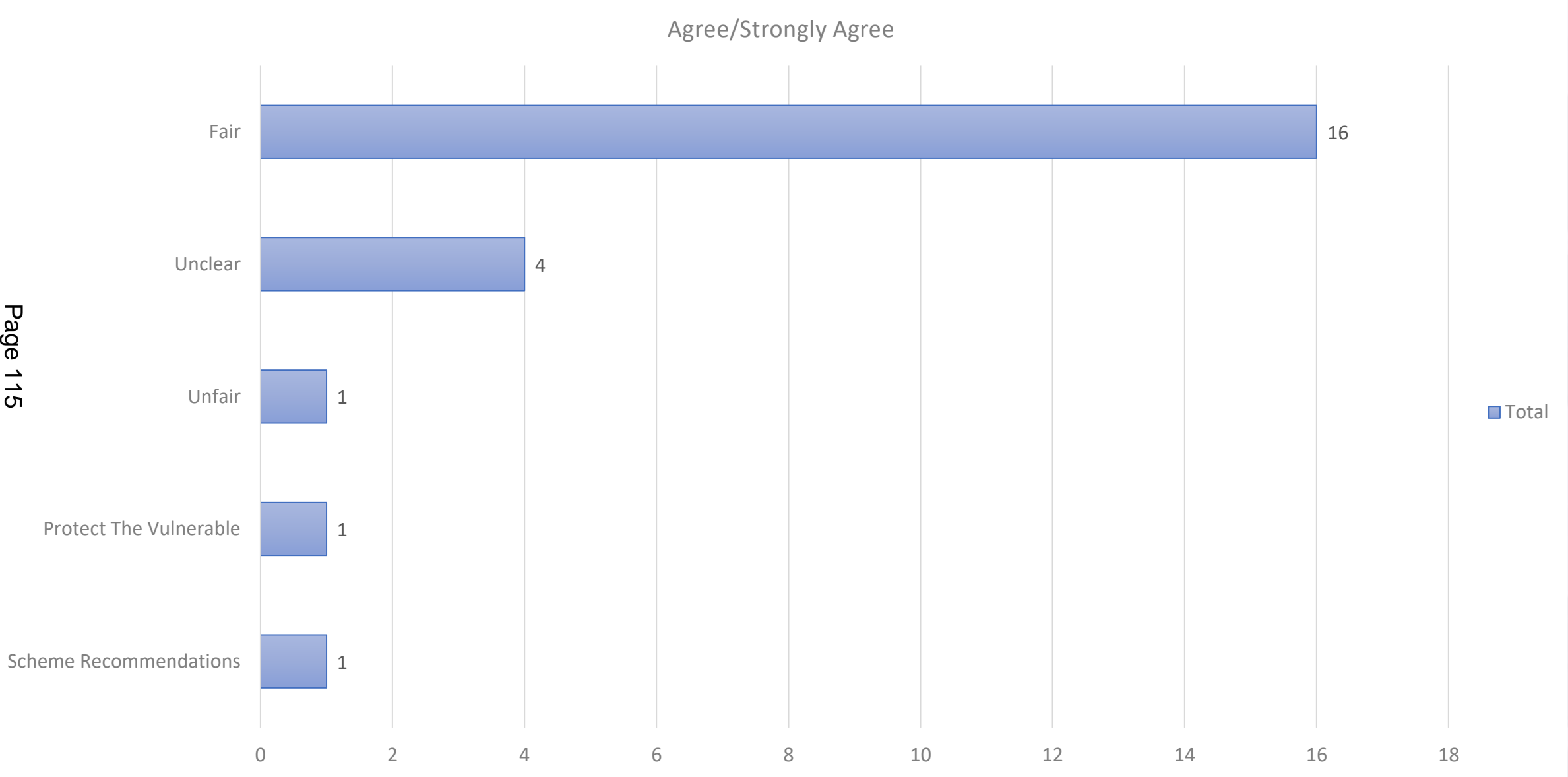
This should stay the same. Otherwise, the very poorest in our community face spiralling debt.

There should be some mechanism for people to appeal in the case of the backdated payment being the result of an error by the council itself

Again, people claim due to hardship making things more stressful for people is totally unacceptable

Some people will deserve the longer backdating because of their circumstances of why they did not claim earlier.

Out of those respondents that 'Agree' or 'Strongly Agree' with this proposal these were the common themes that emerged:



Out of those respondents that 'Agree' or 'Strongly Agree' with this proposal these were some comments we received:

with the caveat that the proposed notification system actually works and has adequate human oversight, and that redress and compensation mechanisms are available to people when it fails.

However, it will mean additional bureaucracy + additional staff requirement which will cost the council monies. There should be a cost/benefit analysis regarding additional costs to process additional applications.

But will it require more personnel to administer

Needs an equality impact assessment; ensuring support for those who may struggle with an application

I think this is a brilliant idea. Many people are unaware of the support that is available, and that a separate application must be made to that for UC.

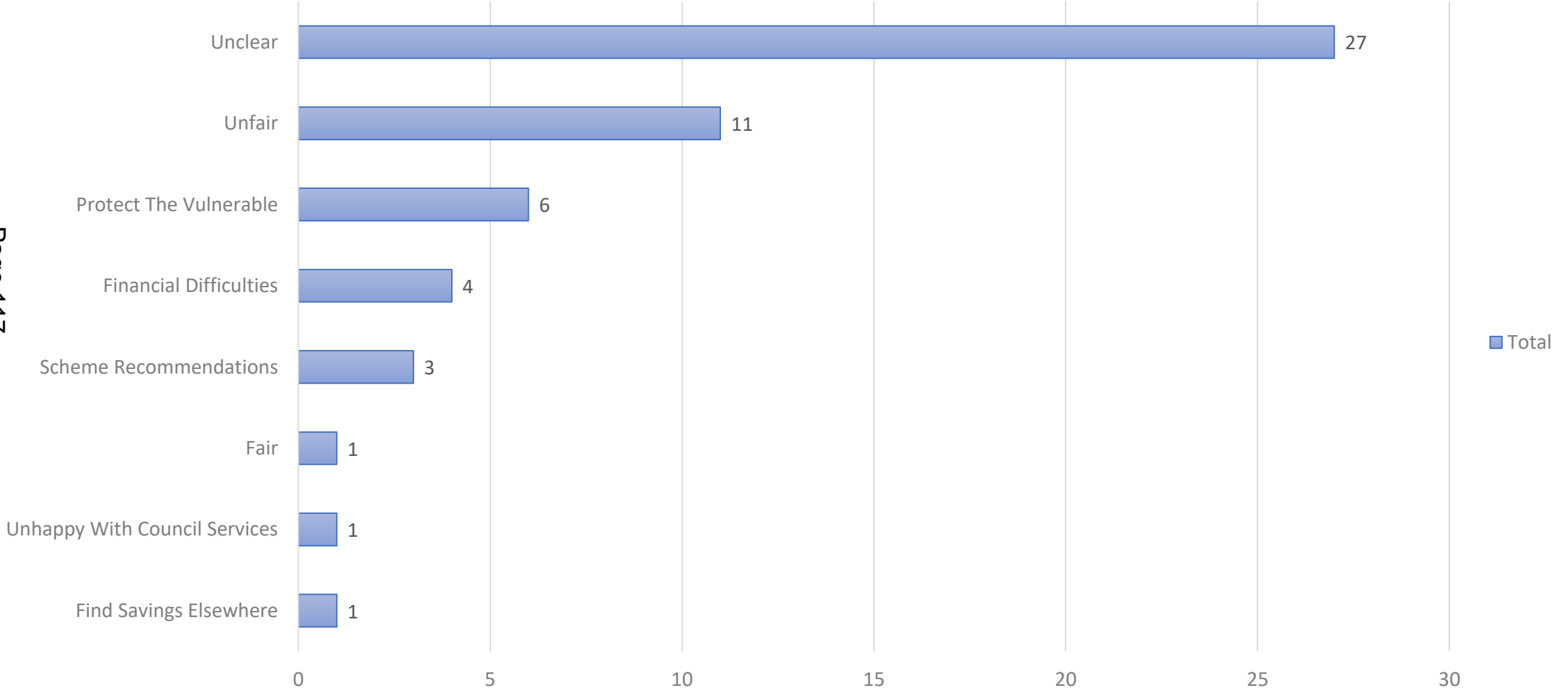
Should be cheaper to administer and fairer too.

This would be extremely beneficial as it would remove stress associated with making applications, especially when one has to make multiple applications. If Brent has the information from the DWP relating to benefits, there should be an automatic application of any relevant Council Tax Benefit

Out of those respondents that 'Disagree' or 'Strongly Disagree' with this question these were the common themes that emerged:

Disagree/Strongly Disagree

Page 117



Out of those respondents that 'Disagree' or 'Strongly Disagree' with this proposal these were some comments we received:

If the DWP advises the council of benefit awards then why is there the need for a separate process, it could be worked out automatically.

Form filling is particularly hard for vulnerable people who need support, so this is just adding extra issues

Additional forms for someone to complete when already stressed can add to anxiety.

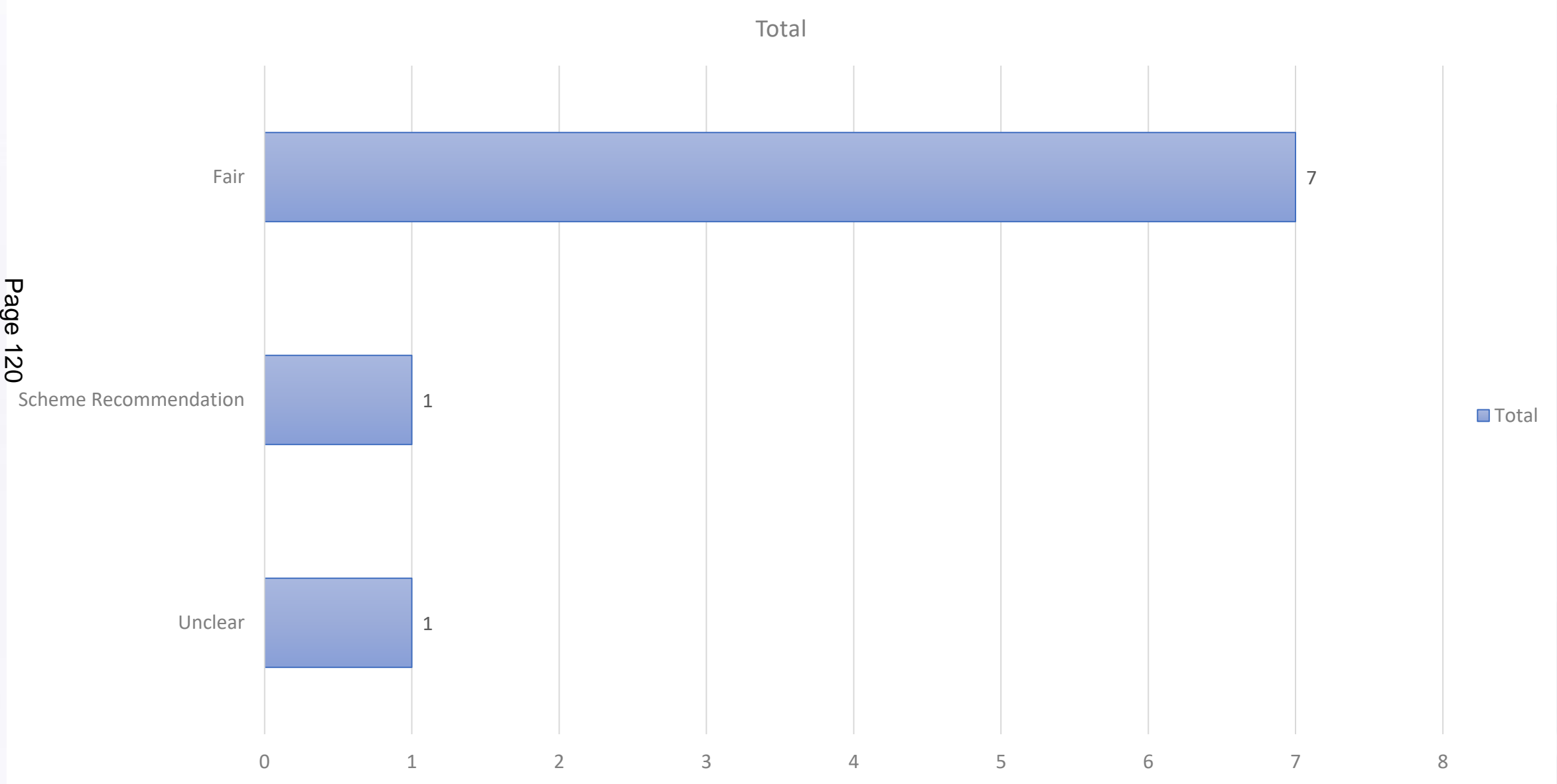
People who are on UC, they are in need and been assessed accordingly, hence I do not see the value of a separate application

The process is already very arduous and hard to navigate through adding another layer will make it more difficult especially for people Migrating to Universal Credit.

The scheme is working fine as it is so why change it?

That's more work for the council. Are you trying to save money or waste money?

Out of those respondents that 'Agree' or 'Strongly Agree' with this proposal these were the common themes that emerged:



Out of those respondents that 'Agree' or 'Strongly Agree' with this proposal these were some comments we received:

The income bands are wages, so they should rise in line with wage inflation, rather than price inflation. Nevertheless, linking to SOME sort of inflation is a good idea.

It's not a bad idea, but growth in earnings would be a more appropriate measure as it pertains directly to income changes and would not be vulnerable to exceptional shocks (e.g. pandemic/war fluctuations)

It's probably fair and reasonable

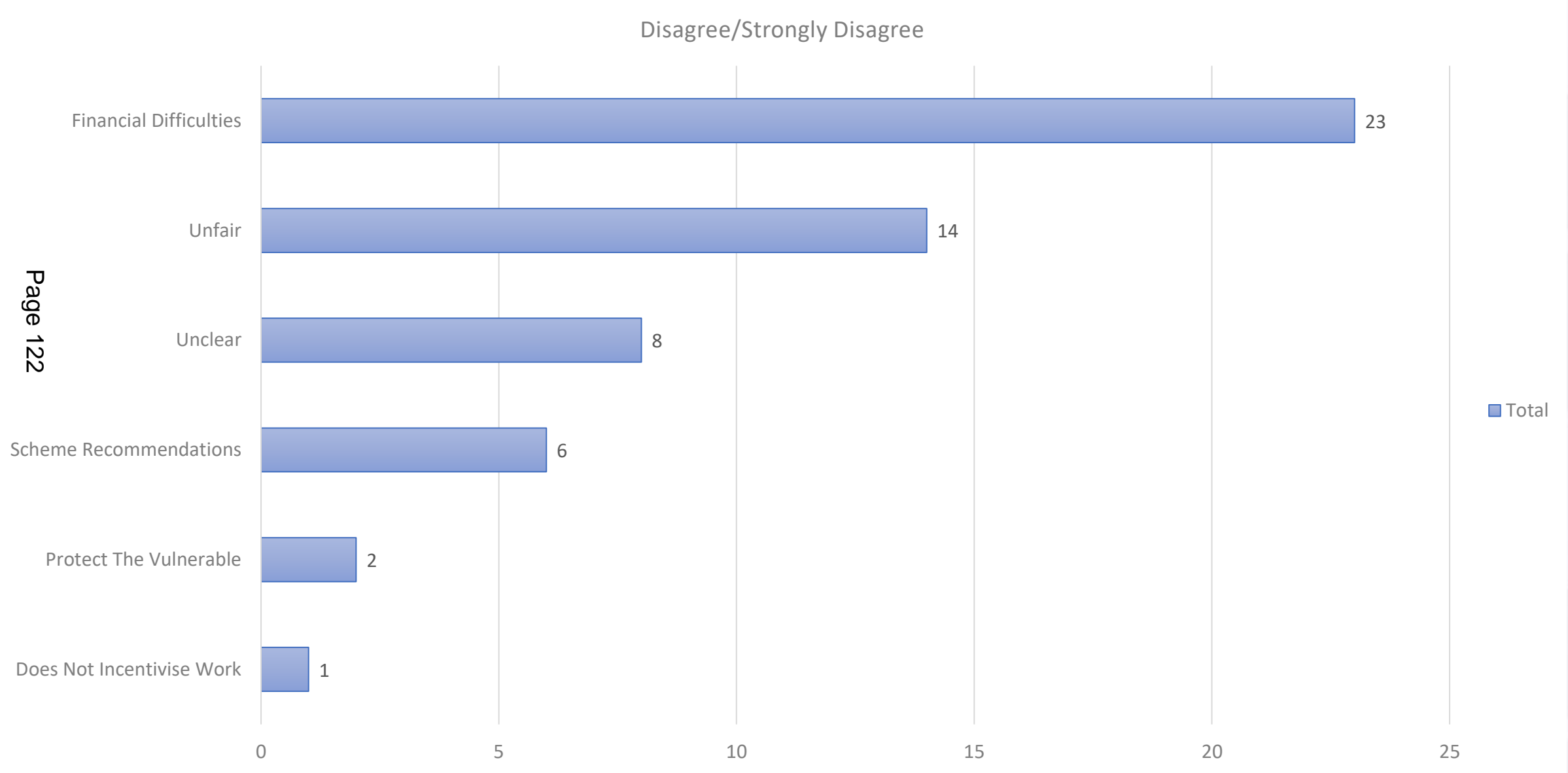
with the caveat that people can challenge rebanding/reassessments if they have not received pay rises /income increases.

This is fair policy.

Considering inflation (but potentially also deflation) is a reasonable guide factor to use.

It's fair

Out of those respondents that 'Disagree' or 'Strongly Disagree' with this question these were the common themes that emerged:



Out of those respondents that 'Disagree' or 'Strongly Disagree' with this proposal these were some comments we received:

CPI isn't measuring increased council costs, so it's not suitable. The council should work harder to automate it's administration.

A more equitable system would involve assessing adjustments based on the actual cost-of-living increases experienced by low-income households, ensuring that the scheme remains fair and supportive of those who need it most.

Ludicrous. You assume wage increases.

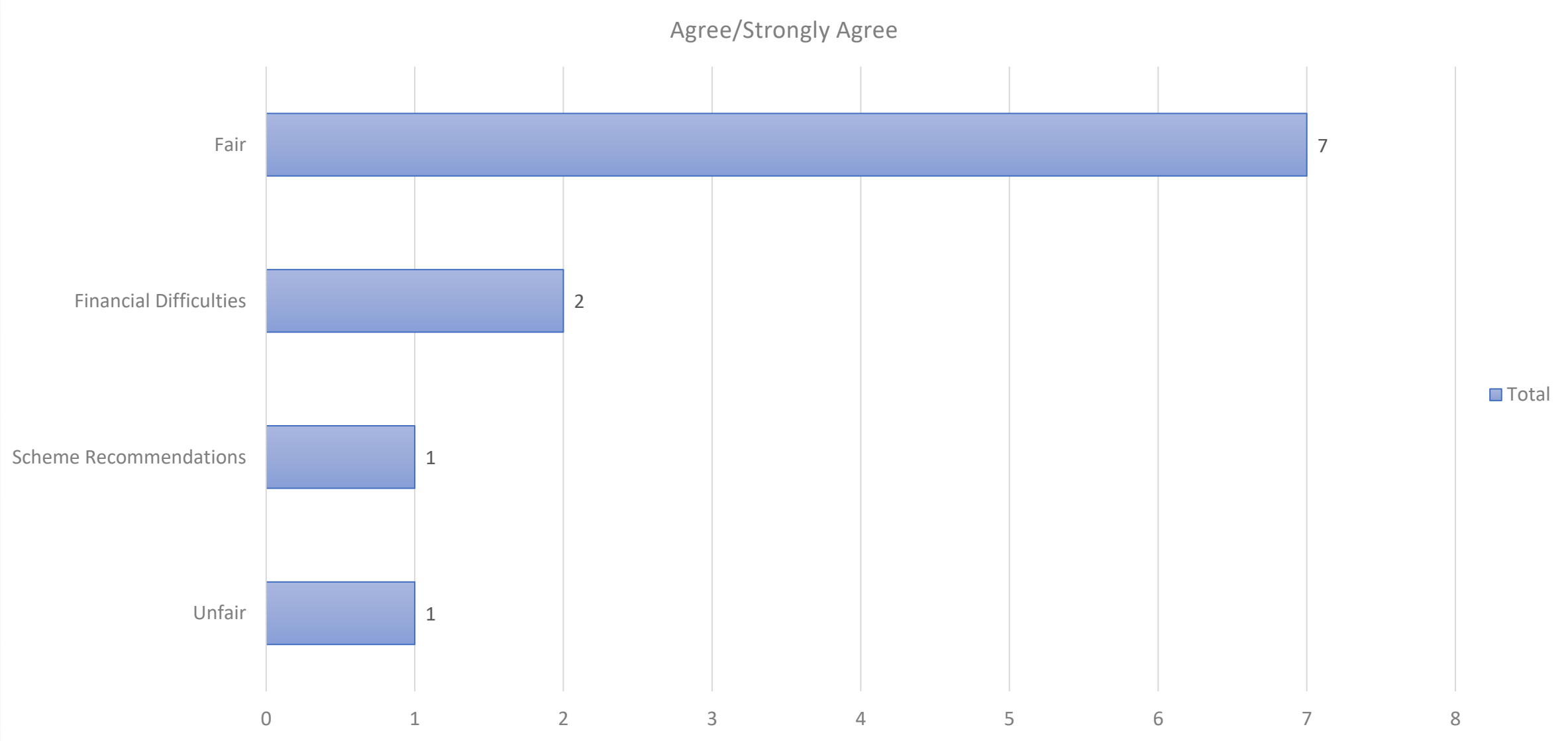
I would only agree if it means I would be paying less than I am now.

Wages do not always increase by CPI, so doing this may widen the disparity between actual income and assumed income. This should be set and agreed on an annual basis, not automatically linked.

If low income and wages do not keep up with CPI this is an issue

Inflation fluctuates wildly

Out of those respondents that 'Agree' or 'Strongly Agree' with this proposal these were the common themes that emerged:



Out of those respondents that 'Agree' or 'Strongly Agree' with this proposal these were some comments we received:

Charges should increase by more than CPI. The council should follow a system similar to duty accelerators
CPI+£1

Non-dependants who share the same household and are in-work will need to pay towards their stay.

It's probably fair

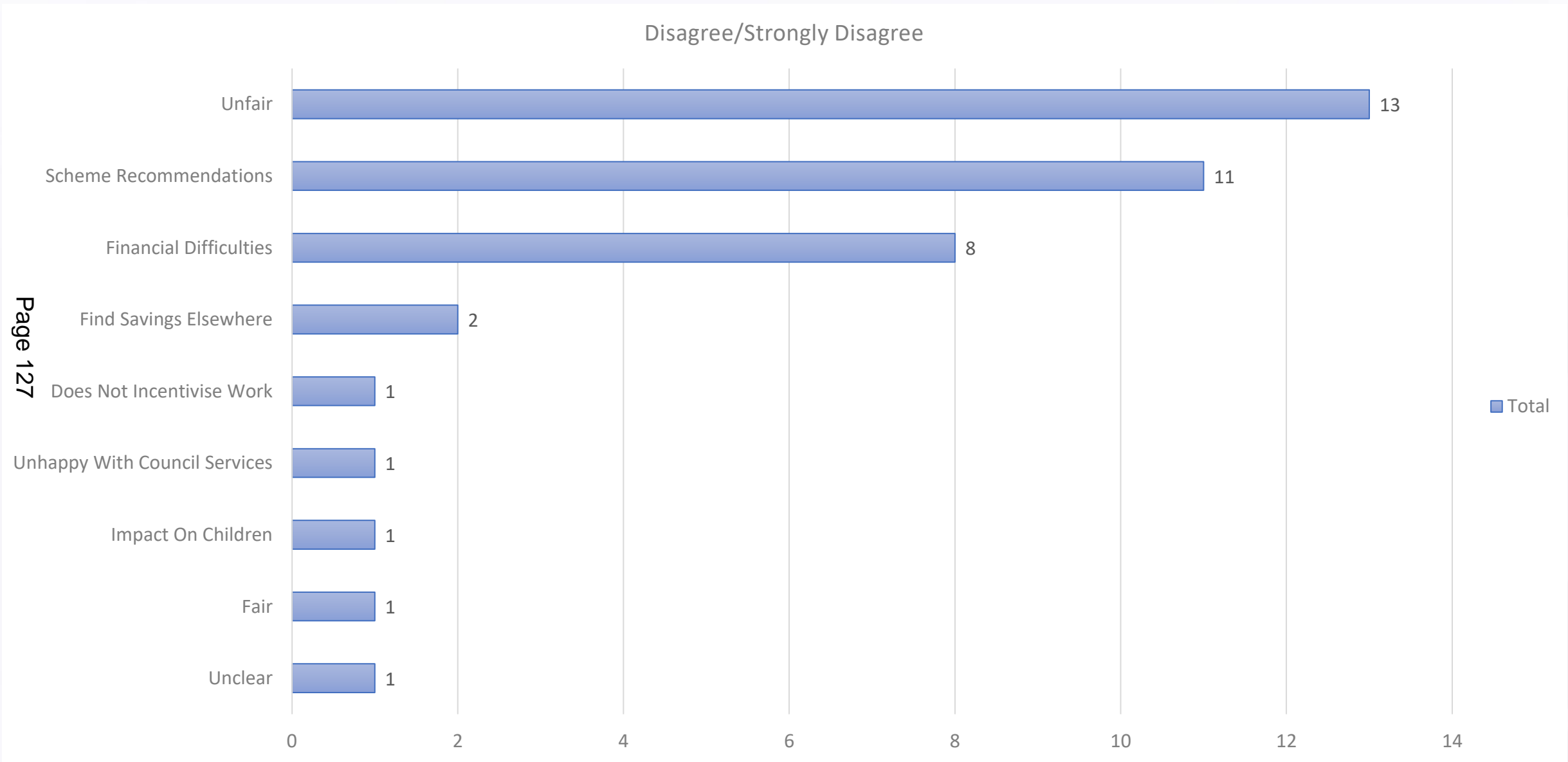
Too expensive

The burden of Council Tax discounts paid by full council taxpayers should be greatly reduced.

it's probably fair and reasonable

Charges connected to inflation are fair.

Out of those respondents that 'Disagree' or 'Strongly Disagree' with this question these were the common themes that emerged:



Out of those respondents that 'Disagree' or 'Strongly Disagree' with this proposal these were some comments we received:

It should be linked to council tax raises.

Another method to increase income at a time when people are struggling

This will increase debt and poverty.

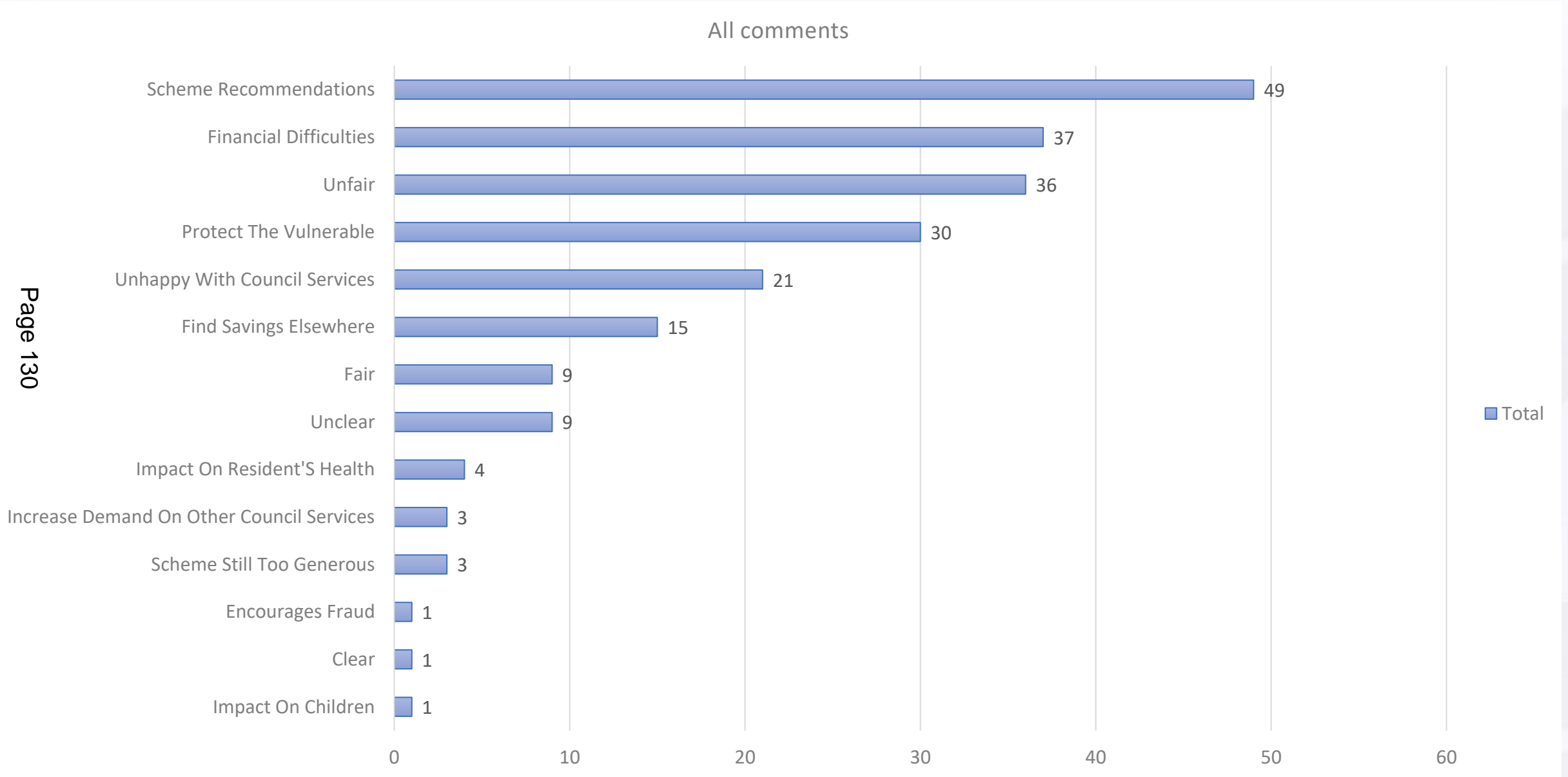
End the dependent charges except for in-work.

I strongly disagree with the proposal to link non-dependant charges to CPI (inflation), as it fails to consider the varying financial situations of non-dependants. CPI adjustments do not account for the disproportionate impact of rising costs on low-income individuals, especially those earning minimum wage, working part-time, or unemployed.

As above. Not until personal allowance is linked to inflation

Children are stressed they don't need more of it

Out of those respondents that gave final remarks, these were the common themes that emerged:



Out of those respondents that 'Agree' or 'Strongly Agree' with this proposal these were some comments we received:

The council is spending too much money in the disabled and needy along with their families, this overly generous council support needs to be slightly trimmed, to reflect the general hardship atmosphere that all taxpayers would have to go through.

Please calculate based on monthly figures, so it becomes comparable to ordinary income and please provide affected people with other means of support if council tax reduction is suggested.

Times are hard enough as it is without adding more stress and pressure to people's lives.

I think it should stay the same. Council tax is very expensive already. The help that people get is needed. So many families are struggling.

I do not think that claimants in receipt of the daily living and mobility components of PIP at the higher rates, should be expected to pay 35% of the Council Tax.

I feel truly grateful for the ongoing and continuing support that Brent Council has shown to me for many years but now as a disabled resident my concern will be that I will suffer hardship if this funding is taken away from me

No, but I think the report is clear and shows the Council has carefully explored the situation.

Email Comments - A total of 11 consultation responses were received via Email, below were some examples:

I was looking out for any scenarios regarding recipients who are on Universal Credit (And PIP) because they are disabled and unable to work. Universal Credit has decreed that because of their disability they are deemed as unable to work. How would the proposed changes affect them?

Page 132

I cannot even manage to pay this council tax that I am paying it is too expensive 151 pounds I am not on any benefit I cannot manage to pay this please help me

Nowhere on the letter does it say if disabled people will be exempt from any changes and if not how much they would pay.

I just wanted to ask a question about the changes to the Council Tax support scheme. Does this affect the single person's discount?

Currently, I receive Council Tax Support, which has been a vital source of assistance for me and my family. With limited space and resources, this support helps ensure we can meet other essential needs for my children, such as their education and well-being.

Being a Disabled resident, I strongly and fully support the existing rules and regulations about the working age council tax support scheme. Not vulnerable people like me, but all poor working age groups need council's financial assistance and support towards their council tax bill etc, as the rate of inflation is on the rise, and cost of living crisis is continuing.

Response copied by email to
Sunita.Ghudial@brent.gov.uk

Sunita Ghudial
Service Manager – Benefits, Financial &
Technical Assessments
Customer Services & Assessments
Residents Services
Brent Civic Centre
Engineers Way, Wembley Park
Wembley HA9 0FJ

City Hall
Kamal Chunchie Way
London
E16 1ZE
Web: www.london.gov.uk

Our ref: 25-26CTSBrent

Your ref:

Date: 15 December 2024

Dear Sunita

**LONDON BOROUGH OF BRENT
GLA RESPONSE TO CONSULTATION ON PROPOSED CHANGES TO
COUNCIL TAX SUPPORT SCHEME FOR 2025-26**

Thank you for your email dated 18 October informing the GLA about the council's consultation on its council tax support scheme for 2025-26. This letter sets out the GLA's response to this consultation.

Introduction

As in previous years, the GLA recognises that the determination of council tax support schemes, under the provisions of the Local Government Finance Act 2012, is a local matter for each London local billing authority. Individual schemes need to be developed which have regard to specific local circumstances, both in respect of the potential impact of any scheme on working age claimants (particularly vulnerable groups) and, more generally, the financial impact on the council and local council tax payers – and therefore the final policies adopted may, for legitimate reasons, therefore differ across the capital's 33 billing authorities.

This fact notwithstanding the GLA also shares in the risks and potential shortfalls arising from the impact of council tax benefit localisation in proportion to its share of the council tax in each London billing authority. It is therefore important that the GLA is engaged in the scheme development process and has an understanding of both the factors which have been taken into account by boroughs in framing their proposals, as well as the data and underlying assumptions used to determine any forecast shortfalls which will inform the final scheme design. The GLA therefore welcomes the engagement which officers at Brent have provided to enable us to understand the proposed new CTS scheme and why it is being considered.

Framing Proposals

As part of the introduction of council tax support in 2013-14, the Government set out its expectation that, in developing their scheme proposals, billing authorities should ensure that:

- Pensioners see no change in their current level of awards whether they are existing or new claimants

- They consider extending support or protection to other vulnerable groups; and
- Local schemes should support work incentives and, in particular, avoid disincentives to move into work.

The GLA concurs with those general broad principles and would encourage all billing authorities in London to have regard to them in framing their schemes.

Financial Challenges Facing the London Borough of Brent

The GLA recognises the financial challenges facing the London Borough of Brent. It is noted that the council - based on published information - is currently projecting a c£16 million budget shortfall in 2025-26 due to cost pressures arising from temporary accommodation, children's services and adult social care. This is on top of estimated cuts of £222 million which the Council has had to deliver since 2010.

Brent – in common with many London boroughs experiencing demographic changes and population growth – has been disadvantaged by the delay in the implementation of the planned fair funding review. This would have allowed the demographic changes which have occurred in the last decade to be reflected in the level of resources received. This may of course be reviewed by the new government alongside the commitment to deliver multi-year settlements from 2026-27.

In relation to council tax support the GLA notes the distribution of funding has not changed since the former DWP subsidy – with a 10 per cent reduction - was rolled into revenue support grant and retained business rates when this was localised in 2013-14. This has meant that while the cost of council tax support schemes has grown in many outer London boroughs in the last decade this has not been matched to date matched by an uplift in funding. As local authorities must maintain the previous national default scheme for pensioner households the entire burden of any savings needed to make CTS schemes affordable therefore continues to fall on working age households.

This year, the Council is forecasting that it will spend £32.8m on its Council Tax Support Scheme, with £19.9m of this being used to support working-age households and the balance of £12.9m on its scheme for pensioners. The scheme is expected to support around 17,000 working-age residents on low incomes with their Council Tax payments. Of these 12,403 households are receiving a 100% discount at present.

The Council is unable to alter its scheme for pensioner households and therefore any savings, if required, can only be delivered through changes for working age residents. The Council is therefore consulting on changes to its council tax support scheme in 2025-26 to deliver additional savings of around £5 million for the Council after allowing for the GLA's share and a provision for potential non collection.

Existing Council tax support Scheme for working age households

In 2020, Brent Council adopted an income banded scheme for working age households which considers a household's total income, and awards a reduction as a percentage of their liability of up to 100 per cent. The existing bands are summarised in Appendix A.

Proposed Changes to Brent's working age council tax support scheme from 2025-26

The Council is consulting on a new scheme to be introduced from 2025-26. This is summarised in Appendix B and set out in more detail on the Council's consultation webpage: <https://haveyoursay.brent.gov.uk/en-GB/projects/council-tax-support-scheme>

There are two key elements to the proposed revised scheme:

- To remove the 100% reduction for out of work or low-income households and apply a percentage reduction to each of the other income bands. Currently all out of work households receive 100% reduction and therefore do not pay any Council tax. It is proposed that this is reduced to a 65% reduction, therefore all households would have to pay at least 35% of their Council tax liability. This would reduce the cost of the scheme by an estimated £7.6m.
- To simplify the process for non-dependent deductions by introducing two flat-rate deductions which would save a further £0.7m:
 - An £8 per week deduction from Council Tax Support for non-dependents in the household who are 'out of work' and
 - a £20 per week deduction from Council Tax Support for non-dependents in the household who are "in work."

The proposed changes to the Council Tax Support scheme are forecast to generate total savings of around £8.3m therefore of which c£5 million would accrue to the Council, c£1.5 million for the GLA on a pro rata basis with the balance reflecting a provision for potential losses due to non collection.

GLA response to proposed changes to Brent's council tax support scheme

The GLA acknowledges that local authorities face difficult choices on CTS schemes in light of their challenging financial circumstances. This is particularly acute in outer London boroughs like Brent which are seeing rapid demographic change leading to pressures on core services including adult social care and children's services alongside rising costs for temporary accommodation due to rising rents and pressures on the supply of housing.

The final scheme design is ultimately a local decision for the London Borough of Brent to determine. If the council decides it wishes to reduce the cost of the scheme, it is inevitable that some residents will, inevitably be required to pay more towards their council tax. We note that the proposed scheme will require a large number of claimants who are not paying any council tax in 2024-25 to pay at least 35 per cent of their liability in 2025-26. We recognise that this is likely to create significant administrative and collection challenges for the Council.

The GLA considers the final decision on Brent's scheme should be based on a comprehensive analysis of household capability to pay increased obligations, with changes to the scheme designed to safeguard against non-collection, minimise household debt, and ensure optimal revenue generation.

As well as enabling the Council to understand in greater detail how specific elements of the proposed changes will affect residents, modelling of households' ability to meet council tax obligations would allow the Council to accurately forecast collection rates, and thus estimate overall revenue accruing to the Council and the GLA as its major preceptor through the changes. Consideration of the impact on various socio-economic populations within the borough would also support the Council in identifying households most vulnerable to increases in household debt. This analysis could be used to calculate the level of changes likely to deliver optimal revenue generation and mitigate to some extent the risk of pushing households into problem debt.

Overall, this approach could support the Council in identifying unintended consequences arising from the proposed changes and develop tailored policies designed to minimise future costs for households and the Council associated with non-payments and increased household debt, utilising data-driven decision making to contribute to the community's long-term financial wellbeing.

The GLA notes the Council proposes to review its section 13A policy in respect of its council tax hardship fund to ensure that households who face difficulty in meeting their new bills may be supported. This will be operated on an application basis that would be accessed via the Council's website.

The GLA notes that the Council has asked if the Mayor would be willing to make a contribution towards the cost of this hardship scheme given it will also benefit from the savings resulting from the new scheme. This request is being considered and the GLA will confirm its response to this request in the New Year.

Providing Information on Schemes

The GLA welcomes the fact that the Council has published scenarios setting out how the changes are likely to affect different households including the extra liabilities they might face next year. It is important this is replicated when the Council publishes its final scheme in advance of council tax bills being issued in March 2025.

It should also conduct more detailed analysis of households' ability to meet these liabilities based on the administrative data the Council has access to. The GLA recommends using established platforms and methodologies for reliable analysis.

The Council should also publish a clear analysis of potential additional costs and savings it expects will materialise from the final scheme agreed so that all local residents and council taxpayers as well as stakeholders such as the GLA are aware of the implications.

Setting the Council Tax Base for 2025-26 and Assumptions in Relation to Collection Rates

The Council will be required to set a council tax base for 2025-26 taking into account the potential impact of the discounts the council may introduce in respect of its revised council tax support scheme and any potential changes the council may implement regarding the changes to the treatment of empty homes and, via new the legislative power coming into force, second homes.

The Council will as part of this need to make a judgement as to the forecast collection rates from those claimants and council taxpayers affected by any changes to its local council tax support scheme.

The GLA would encourage the Council to provide it with an indicative council tax base forecast as soon as options are presented to members for approval, in order that it can assess the potential implications for the Mayor's budget for police, fire and other services for 2025-26. This should ideally be accompanied by supporting calculations disclosing any assumptions around collection rates and discounts granted having regard to the final council tax support scheme design.

I would like to thank you again for consulting the GLA on the changes being considered to the Brent's council tax support scheme for 2025-26.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M. Mitchell', written in a cursive style.

Martin Mitchell

Finance Manager

Email: GLAbudget@london.gov.uk and martin.mitchell@london.gov.uk

SUMMARY OF EXISTING BANDED SCHEME IN PLACE IN 2024-25

In 2020, Brent Council adopted an income banded scheme, which considers a household’s total income, and awards a reduction as a percentage.

This year, the council forecasts it will spend £32.8m on the Council Tax Support Scheme, with £19.9m used to support working-age households and the balance on pensioner households.

The scheme helps around 17,000 working-age residents on low incomes with their Council Tax payments. Of these, 12,403 households are expected to receive a 100% discount.

The level of support provided to a household is assessed based on the weekly income against a series of income bands (all income used in the calculation excludes any DWP or HMRC benefits and any income in respect of caring for a foster child).

The table below sets out the current income bands and the corresponding percentage reduction that is applied.

Claimant and partner's income per week	Maximum level of council tax support
£0 - £80	100%
£81 - £110	80%
£110 - £150	50%
£151 - £250	30%

PROPOSALS BEING CONSULTED TO AMEND THE COUNCIL TAX SUPPORT SCHEME FOR WORKING AGE RESIDENTS IN BRENT IN 2025-26

The proposed changes to the scheme will only affect working-age residents. Pensioners are exempt and will continue to be assessed under the existing system, which can cover up to 100% of their Council Tax bill.

Any changes would take effect from 1 April 2025 and have been developed by the Council from its perspective to deliver a fair, affordable scheme.

There are two key areas where changes are proposed to be made which would deliver estimated savings in the region of £8.3m in total (around £5m in net savings after allowing for collection rates and the GLA’s estimated £1.5 million share):

PROPOSAL 1

To remove the 100% reduction for out of work or low-income households and apply a percentage reduction to each of the other income bands.

Currently all out of work households receive 100% reduction and therefore do not pay any Council tax.

It is proposed that this is reduced to a 65% reduction, therefore all households would have at least a 35% Council tax liability. This would reduce the gross cost of the scheme by £7.6m. The table below sets out the current and proposed percentage reduction that will apply:

PROPOSED INCOME BANDINGS AND MAXIMUM LEVEL OF CTS SUPPORT

Income per week between	Current Scheme	Proposed
£0-£80	100%	65%
£80-£110	80%	50%
£110-£150	50%	30%
£150-£250	30%	20%
£250+	0%	0%

PROPOSAL 2

Changes to non-dependant deductions

In addition to the above, the Council is proposing making changes to the non-dependant deductions.

A non-dependant deduction is an amount that is deducted from the Council Tax Support entitlement for a person aged over 18 living in the property.

The council reduces the level of Council Tax Support provided if there are other adults (non-dependents) living in the household. Currently, there are four different deduction rates based on the non-dependents' circumstances and income. The Council proposes simplifying this process by introducing two flat-rate deductions:

- £8 per week deduction from Council Tax Support for non-dependents in the household who are "out of work."
- £20 per week deduction from Council Tax Support for non-dependents in the household who are "in work."

The Council argues this change will eliminate the need to verify the exact income of non-dependents, simplifying administration and reducing costs for the council.

OTHER CHANGES BEING PROPOSED

Along with the preferred option, Brent is also proposing the following administrative changes to its scheme:

Limit Backdating to one month

Currently claims for Council Tax Support from working age claimants begin from Monday following the date the application is made to the council with the possibility to be backdated up to the beginning of the financial year where the claimant is in receipt of Universal Credit. The Council proposes to keep the start date the same with claims beginning from Monday following the date the application is made to the council directly or indirectly via their claim for Universal Credit.

However, it proposes restricting the maximum backdating period allowed to one month where the customer is in receipt of Universal Credit or can show good cause as to why they have not applied sooner.

It argues this will

- Simplify administration as circumstances will not need to be verified or requested going back to the beginning of the financial year in which the application was made.
- Deliver a straightforward change that should result in a scheme that is easier for customers to understand as it should in most cases closely align a customer's start date for Housing Benefit and Council Tax Support.

New working age resident claimants may see a reduction in the amount of support they receive therefore if they are unable to claim on a timely basis.

The introduction of an additional application process for Council Tax Support (Universal Credit applicants only)

Currently, residents claiming Universal Credit must make a separate application to the Council to apply for CTS. This can be confusing and stressful for residents and often results in people not getting the support to which they could be entitled.

The Council proposes simplifying the process and adding an additional avenue for residents to claim Council Tax Support.

Whenever a Brent resident starts receiving Universal Credit, it receives a notification from the Department for Work and Pensions. With this change, it would automatically consider these notifications as applications for Council Tax Support.

This, would remove the need for those residents, successful in their application to Universal Credit, to apply for Council Tax Support separately via its website.

This would in the Council's view

- Remove the need for the majority of working age people to make a separate claim for CTS via our website where they have been awarded Universal Credit.
- Simplify the application process and reduce the difficulty for those who claim Universal Credit.
- Ensure that as many people as possible claim the support to which they are entitled.

Linking Income bands to Consumer Pricing Index (CPI)

The Council proposes to increase the level of income (within the income bands) to qualify for support for customers depending on the CPI from September of the previous year.

This would mean in the Council's view that the value of the scheme to residents is maintained year on year and likewise the scheme cost is maintained for the Council.

Linking non-dependant charges to Consumer Pricing Index (CPI)

The Council proposes to increase the non-dependant charges from 1 April each year depending on the CPI from September of the previous year.

This would mean that non-dependant charges increased in line with CPI. The non-dependant in the household would be expected to pay more towards the Council Tax liability e.g. the proposed 'in work' charge of £20 a week would increase to £20.34 in line with inflation (based on the 1.7 per cent CPI rate as of September 2024).

Case studies relating to impact of proposal 1

The Council has provided the following case study scenarios in its consultation material.

Scenario 1

Single parent, Band C, 2 children, working 16 hours per week at national living wage (£183.04).

Under this proposal, this would mean an increase to their council tax owed per week of £2.61 / £135.72 per annum

<u>Current Scheme</u>		<u>Proposed Scheme</u>	
Weekly council tax liability	£26.03	Weekly council tax liability	£26.03
Weekly CTR entitlement	£7.81	Weekly CTR entitlement	£5.21
Weekly council tax to pay	£18.22	Weekly council tax to pay	£20.83

Scenario 2

Couple, Band C, 2 children, passported. 1 non-dependant not working.

Under this proposal, this would mean an increase to their council tax owed per week of £12.15 / £631.70 per annum

<u>Current Scheme</u>		<u>Proposed Scheme</u>	
Weekly council tax liability	£34.71	Weekly council tax liability	£34.71
Weekly CTR entitlement	£29.71	Weekly CTR entitlement	£17.56
Weekly council tax to pay	£5.00	Weekly council tax to pay	£17.15

Scenario 3

Single person, Band C, in receipt of Universal Credit and not working.

Under this proposal, this would mean an increase to their council tax owed per week of £9.11 / £473.72 per annum

<u>Current Scheme</u>		<u>Proposed Scheme</u>	
Weekly council tax liability	£26.03	Weekly council tax liability	£26.03
Weekly CTR entitlement	£26.03	Weekly CTR entitlement	£16.92
Weekly council tax to pay	£0.00	Weekly council tax to pay	£9.11

This page is intentionally left blank

Response to the Proposed Changes to the Brent Council Tax Support Scheme 2025/26

Summary

This report details Citizens Advice Brent's response to Brent Council's proposed changes to the 2025/26 council tax support scheme. To assess how the scheme might affect Brent residents we conducted research into how the current council tax support (CTS) scheme aids low-income households. We compared this to the level of support offered under the proposed 2025/26 scheme to analyse how these households might be impacted by the changes. We conducted a flash survey of working age Brent residents who are already in receipt of CTS. Below we lay out our assessment of the findings of this survey, followed by the recommendations we would make in rethinking the proposed 2025/26 scheme.

Key Recommendations:

- **Reduce the 35% minimum payment.**
- **Reinforce protections from enforcement action for financially vulnerable residents with council tax debt.**
- **Make greater use of the 'Council Tax: Discretionary Reduction Policy' and refine the processing of applications for a discretionary reduction.**
- **Define instances in which CTS claims can be backdated for over 1 month.**

Background

Brent Council's Proposed Changes

Key aspects of the proposed new scheme:

- To introduce a standard **35% minimum payment for working-age households** and apply a percentage reduction to each of the income bands. This means all CTS claimants will be expected to contribute a minimum of 35% towards their Council Tax Liability.
- Simplify the non-dependent charges and have just two flat rate non-dependent deductions for most households with other adults living in the property, **£8 per week for non-dependents "out of work" and £20 per week for non-dependents "in work"**.
- The proposed changes will only affect working-age households receiving Council Tax Support from April 2025. Pensioners are exempt and will continue to be assessed under the existing system, which can cover up to 100% of their Council Tax bill.

Proposed Changes to Council Tax Support Rates

There are also a few technical administrative proposed changes to the scheme:

- Limit Backdating to one month.
- The introduction of an additional application process for Council Tax Support (Universal Credit applicants only)
- Linking Income bands to Consumer Pricing Index (CPI)

Results

Survey

We conducted a flash survey to determine how the proposed changes to CTS could affect Brent residents. In total, we surveyed 32 CTS claimants over a period of 3 weeks. The survey was targeted at Brent residents who already receive some level of CTS, with questions aiming to establish respondents' current council tax liability, level of council tax support, and whether they maintain a positive budget. This enabled us to assess how the proposed changes will alter the financial situations of individual households.

Key Findings

- **The average council tax bill increase for the CTS claimants we surveyed was £524.98**
- **13 out of 32 CTS claimants we surveyed did not have enough income to cover their monthly costs, despite receiving the maximum level of CTS.**
- **2 in 3 CTS claimants we surveyed will receive a new or increased council tax bill that they currently do not have the monthly income to pay.**

Table 1 shows the current and projected council tax bill for each of the CTS claimants we surveyed. The table is sorted from highest to lowest council tax bill increase.

Respondent	Current yearly council tax bill	Yearly council tax bill after changes	Council tax bill increase
------------	---------------------------------	---------------------------------------	---------------------------

9	2397.37	3505.10	1107.73
15	260.00	1081.05	821.05
21	260.00	1081.05	821.05
13	0.00	665.05	665.05
16	0.00	665.05	665.05
18	0.00	665.05	665.05
25	0.00	665.05	665.05
17	0.00	581.91	581.91
5	0.00	561.13	561.13
3	0.00	498.78	498.78
4	0.00	498.78	498.78
6	0.00	498.78	498.78
10	0.00	498.78	498.78
11	0.00	498.78	498.78
22	0.00	498.78	498.78
24	0.00	498.78	498.78
29	0.00	498.78	498.78
12	0.00	436.44	436.44
19	0.00	436.44	436.44
27	0.00	436.44	436.44
30	237.54	623.48	385.94
23	763.52	1122.27	358.75
2	2069.82	2316.13	246.31
14	1108.51	1330.09	221.58
8	1187.69	1246.96	59.27
1	0.00	0.00	0.00
7	0.00	0.00	0.00
20	0.00	0.00	0.00
26	0.00	0.00	0.00
28	0.00	0.00	0.00

Table 2 shows the council tax bill increase for each respondent sorted from highest to lowest, with data on respondents' budgets and their current level of council tax arrears.

Respondent	Council tax bill increase	Money at the end of the month	Council tax arrears
9	1107.73	More than £100	None
15	821.05	£0 - £10	None
21	821.05	Negative budget	None
13	665.05	Negative budget	None
16	665.05	Negative budget	£25 - £50
18	665.05	Negative budget	More than £1000
25	665.05	Negative budget	None
17	581.91	£0 - £10	£100 - £500
5	561.13	£25 - £50	More than £1000
3	498.78	£10 - £25	None
4	498.78	£0 - £10	None
6	498.78	Negative budget	None
10	498.78	£0 - £10	None
11	498.78	£0 - £10	None
22	498.78	Negative budget	None
24	498.78	More than £100	None
29	498.78	Negative budget	None
12	436.44	Negative budget	None
19	436.44	More than £100	None
27	436.44	Negative budget	None
30	385.94	Negative budget	£500 - £1000
23	358.75	£10 - £25	None
2	246.31	£0 - £10	£100 - £500
14	221.58	£0 - £10	None
8	59.27	More than £100	None
1	0.00	Negative budget	None
7	0.00	£0 - £10	None
20	0.00	Negative budget	None
26	0.00	Negative budget	None
28	0.00	£25 - £50	None

In analysing this data, we focused on three key areas:

1. **Council tax arrears** – We wanted to know how drastically the proposed changes could increase the arrears balances of residents who already have council tax debt.
2. **Household budgets** – We assessed how many respondents would experience a critical financial impact because of the proposed changes, with their currently positive budget being pushed into the red by a new or increased council tax bill.
3. **Change in council tax liability and level of support** – We looked to establish the difference the proposed changes could make to each respondent's financial situation.

Council Tax Arrears

Among the 32 CTS claimants who responded, 7 had some level of council tax debt. Even while receiving CTS some residents have significant arrears balances. One response indicated a household with over £1000 in council tax arrears despite CTR now covering 100% of their bill. **Under the new changes this household would face a yearly bill of over £665.**

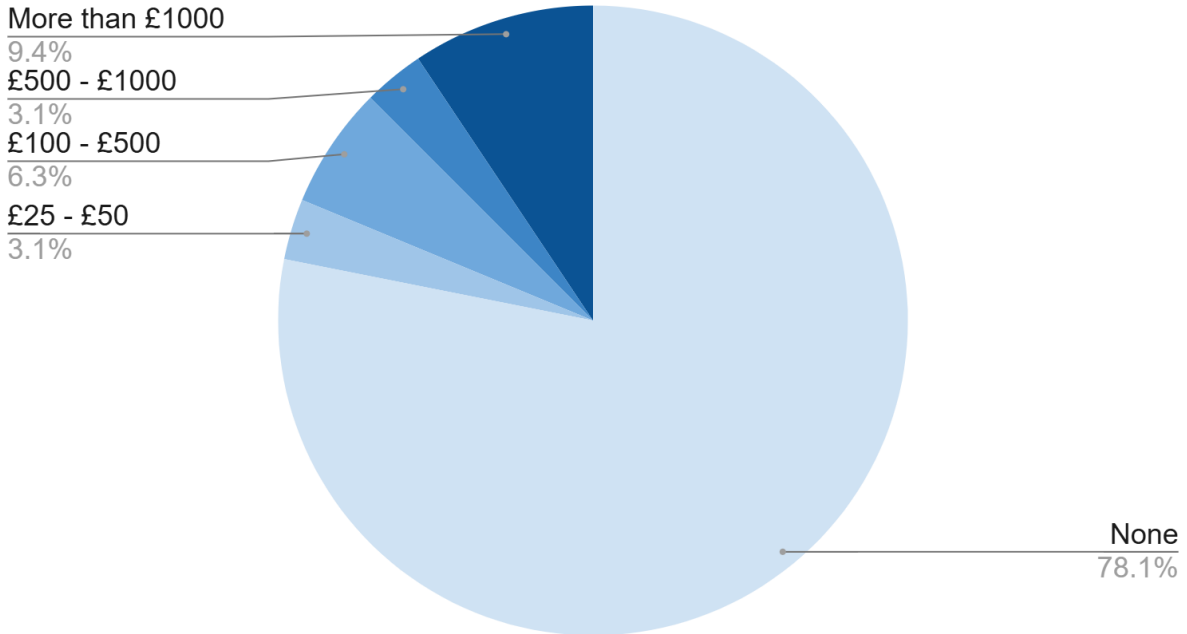
Council tax arrears can quickly spiral out of control, with monthly payment defaults potentially leading to being billed for the entire year. Brent households already struggling with council tax debt are likely to see their arrears balances increase if the proposed changes are implemented, putting them at risk of enforcement action.

Since 2021 Brent Council has made over 40,000 referrals¹ for enforcement action against residents with council tax arrears. The proposed changes risk seeing an

¹ 2023 FOI Request, [Non Payment of council Tax - a Freedom of Information request to Brent Borough Council - WhatDoTheyKnow](#)

increase in enforcement action against households already struggling with debt, and with very little income available for new or increased bills.

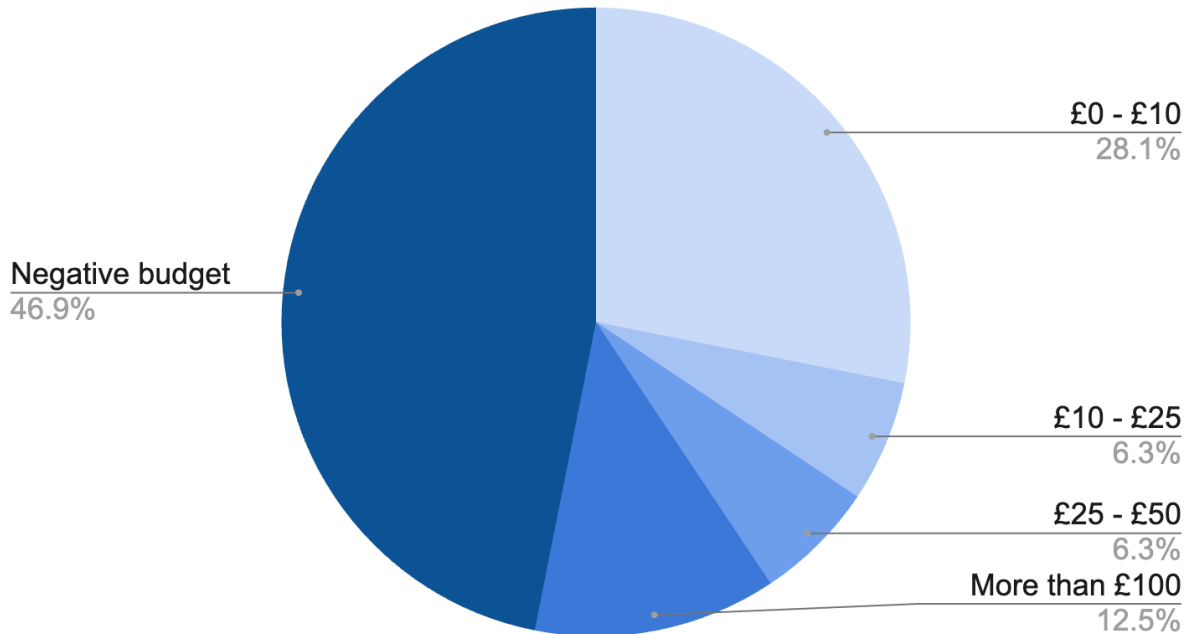
Council Tax Arrears



Household Budgets

Establishing a positive budget is an important factor in achieving financial stability. Of the 32 respondents we surveyed 25% reported generally having at least £10 left after covering all their expenses each month. **Under the proposed changes, of 8 households with over £10 in monthly excess income, 2 would have this wiped out altogether by their increased council tax bill.**

Money left at the end of the month



A significant proportion of the Brent residents we spoke with for this survey are experiencing financial hardship. Out of the 32 respondents 15 said their monthly income was not enough to cover all their expenses, meaning they are operating with a negative budget. This reflects figures from National Citizens Advice showing that over half of all Citizens Advice clients seeking debt advice are now in a negative budget².

Despite receiving CTR some of the claimants we surveyed are potentially facing multiple debts already. **Of the 15 households reporting a negative budget 11 will face a new or increased council tax bill under the proposed changes, with an average monthly bill of £47.24.**

In addition, 9 responses indicated households with an excess income of £0 - £10, meaning they are on the edge of being pushed into a negative budget. Of these, **7**

² Wild, Morgan, *Living on Empty: a policy report from Citizens Advice*, 2023, <https://wearecitizensadvice.org.uk/living-on-empty-245f4b9acbe3>

households will face a new or increased council tax bill that they will be unable to pay. The new average bill for these households will be £40.08 per month. The proposed changes will force these financially precarious households into a choice of either cutting back on essential costs or falling into debt.

Case Studies

The following case studies are hypothetical scenarios based on our survey data. They describe how the proposed changes might affect different Brent households.

Liz and Rita

Liz rents a two-bedroom Band C property with her adult daughter Rita. They currently claim CTS at the highest rate, but because Rita counts as a non-dependent they have a monthly council tax bill of £43.30. Liz is disabled and Rita is her full-time carer. They both claim all benefits they are eligible for, with Rita claiming carer's allowance, which allows them to just maintain a positive budget. However, they regularly have less than £10 left at the end of the month so are not able to save any money and often worry about their financial situation.

Under the proposed CTS changes, Liz and Rita would face a monthly council tax bill of £63.42. This increase of £20.12 per month will put them in an impossible situation, with a significant risk of falling into council tax arrears.

Ahmed

Ahmed has council tax arrears of over £1000 that has accumulated since he became unemployed last year. He only realised recently that he is eligible to claim CTS. He successfully made a claim, meaning his council tax is now 100% covered by CTS, and this has made a positive impact on his financial situation. He now has excess income at the end of each month of £25-£50. This means that Ahmed can begin making payments towards his council tax arrears.

However, under the proposed changes, Ahmed will have a new council tax bill of £46.76 per month. It is likely he will struggle to make these payments. Even if he does, his existing arrears balance will remain, and Ahmed will no longer be able to make payments towards it.

Recommendations

1. Reduce the minimum council tax payment of 35%

Research from National Citizens Advice (NCA) shows that **clients living in a local authority with a minimum payment are 57% more likely to have council tax arrears.**

The minimum payment proposed by Brent Council of **35% would be one of the highest in the UK.** While minimum payments in general are liable to push low-income residents into debt, the level of minimum payment can make a significant difference. NCA data shows that:

“For each 1% increase in minimum payment, we see a 0.23% increase in the proportion of our debt clients receiving CTS who have council tax debt. This means that in an area with a 50% minimum payment, we would expect to see 10% more clients with council tax debt than in an

area with a 5% minimum payment, if the other factors remained the same”³

According to these figures, **Citizens Advice Brent would expect to see an 8.05% increase in the proportion of debt clients who receive CTS and who are in council tax arrears if the proposed changes are implemented.**

To avoid placing undue hardship, and the possibility of spiralling council tax arrears, on low-income households, Brent Council should rethink the proposed changes by lowering the minimum payment.

2. Use existing protections for financially vulnerable residents claiming CTS.

The proposed changes will increase the level of council tax arrears held by CTS claimants. For those already with council tax debt, the changes will make it more difficult for them to pay this off. For others, it will mean they are faced with a new council tax bill that they will be unable to pay without cutting back essential costs or accumulating other forms of debt. It is inevitable that some of these claimants will fall into council tax arrears without a clear pathway to clearing their debt.

As a priority debt, **council tax arrears can be one of the most troubling forms of debt.** Inability to pay for a couple of months can mean being faced with a bill for the entire year and committal proceedings remain a real possibility to those who do not pay back arrears.

Even initial enforcement action can be enormously stressful for households in a vulnerable financial position. **Eligibility for CTS is in and of itself evidence of some level of financial vulnerability, and this should be taken into**

³ Rose. Maddy (National Citizens Advice), *Council Tax Support? A benefit determined by postcode not need*, 2024, [FINAL Council Tax Support? A benefit determined by postcode not need](#)

consideration wherever the council considers initiating enforcement action.

The council should ensure staff are trained in implementing its own ethical debt recovery policy. They should also make it clear what extra support they will offer to recipients of CTS who end up in council tax arrears and should avoid taking premature or undue enforcement action against claimants.

3. Make greater use of the Council Tax: Discretionary Reduction Policy to assist the most financially vulnerable residents.

Given that the proposed changes to the 2025/26 CTS scheme will bring about increased financial hardship for Brent households, the council should refine and promote other forms of support that may offer help to residents struggling with their council tax bills.

The council tax liability discretionary reduction policy under section 13A of the Local Government Finance Act 1992 is already used to mitigate the impact of council tax bills on financially vulnerable households. We suggest the council take steps to **simplify the application procedure for residents who may need a discretionary reduction in their council tax liability and ensure council staff are trained to process applications as efficiently as possible.**

Application procedures should follow the Standard Financial Statement Guidance already adopted by Brent Council. This means that so long as an applicant's financial statement demonstrates an inability to pay council tax, their council tax liability should be automatically reduced.

4. Clarify the rules on backdating CTS claims and allow for circumstances in which CTS should be back-paid for more than one month.

The proposed changes do not outline situations where the new rule on limiting CTS backdating may not apply. In a number of cases, the new rule could cause undue


hardship, and the council should consider how they will handle backdating requests when it comes to these situations.

We welcome the steps the council proposes to integrate the CTS application procedure with the UC system. This has worked well for other local authorities and saves claimants significant time, effort and stress. However, there are many valid reasons for someone newly eligible for UC to be delayed in making a claim. Under the new system, new claimants could see their CTS backdated to just one month alongside their UC, even if they had been eligible for these benefits for several months.

Nationally, **CTS is a benefit with one of the lowest uptake rates**. In carrying out our survey, we found that many respondents did not understand the current terminology used by Brent Council. Respondents were often not aware of the distinction between council tax discounts and council tax support. **The risk of claiming CTS late is likely already high because of this. New claimants are in danger of being punished even more harshly for delays under the new rules.**

The council should make efforts to ensure that residents understand CTS and how they can claim it to avoid claimants losing out due to lack of awareness. **The council should also consider retaining the current backdating rules, in which claims can be backdated to the start of the financial year in cases where there has been a good reason for claimants to have delayed making an application.**

This page is intentionally left blank

 Brent	Cabinet 10 February 2025
	Report from the Corporate Director, Finance and Resources
	Lead Member - Deputy Leader & Cabinet Member for Finance and Resources (Councillor Mili Patel)
Budget and Council Tax 2025 - 26	

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:	21 – See list attached
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	<p>Minesh Patel Corporate Director, Finance and Resources Tel: 020 8937 4043 Email: minesh.patel@brent.gov.uk</p> <p>Rav Jassar Deputy Director, Corporate & Financial Planning Tel: 020 8937 1487 Email: ravinder.jassar@brent.gov.uk</p> <p>Amanda Healy Deputy Director, Investment and Infrastructure Tel: 020 8937 5912 Email: amanda.healy@brent.gov.uk</p>

1.0 Executive Summary

1.1 The purpose of this report is to set out the Council's budget proposals for 2025/26. It also sets out the results of the statutory processes of consultation, scrutiny and equalities analyses. Following consideration by Cabinet on 10 February 2025, these proposals now form the basis of the budget to be agreed by Full Council on 27 February 2025. The report also sets out the overall financial

position facing the Council for the medium term and highlights the significant risks, issues and uncertainties.

- 1.2 Reports on the budget position have been brought to Cabinet throughout the year, most recently in July and November 2024. In January 2025, Cabinet also received the Quarter 3 forecast position for 2024/25, which set out a forecast overspend of £17.4m. The forecast overspend is primarily within the Housing service (£15m), which has been experiencing high levels of demand since 2023 due to a rise in homelessness and a reduction in the supply of suitable temporary accommodation. Additionally, new pressures have arisen within the Children & Young People and Community, Health & Wellbeing directorates. These pressures are being partially offset by £8m of in-year savings that have been identified across the Council, which are part of a package of new measures to provide more assurance over the Council's spending decisions, in order to contain identified pressures as much as possible.
- 1.3 In February 2024, Council agreed the budget for 2024/25, which included £12.5m of savings, with £4.4m to be delivered in 2025/26. It was estimated in July 2024 that a further £30m of savings would be required across the Medium Term Financial Strategy period from 2025/26 to 2027/28, profiled £16m in 2025/26, £7m in 2026/27 and £7m in 2027/28. As a result, the total estimated savings requirement for 2025/26 as of the draft budget in November 2024 was £20.4m.
- 1.4 The £16m of new savings proposed at the Draft Budget in November 2024 is broken down as follows:
 - £4.5m of savings proposals from services (Appendix C (ii))
 - £5.0m of additional Council Tax income resulting from changes to the Council Tax Support scheme (to be approved by Full Council alongside the Budget & Council Tax report on 27 February 2025)
 - £6.5m of operating efficiencies to be delivered by services in 2025/26
- 1.5 Brent has delivered total cumulative savings of £218m between 2010 and 2025. The proposed savings for 2025/26, in addition to those agreed in February 2024 will take this total to £238m (55% of the net revenue budget for 2025/26). Furthermore, the Medium Term Financial Strategy (MTFS) model has been extended to 2028/29 to cover what is expected to be a three year settlement from 2026/27. Budget assumptions on income and expenditure have been reviewed and updated and rolled over and there is now an estimated budget gap for 2026/27 to 2028/29 of £28m, which will require an average of just over £9m of savings in each year (up from the £7m estimate in July 2024 for the first two years).
- 1.6 The new government has stated its intentions to reform local government financing from 2026/27, with particular focus on diverting resources to authorities that need them most and delivering the first reset of the business rates retention system since it was created in 2013. Although a consultation on future funding reforms has been announced, until there are further details on the impact and

transition to these reforms, it makes it extremely challenging to be precise about future financial targets. Likewise, the government has increased employer National Insurance Contributions without providing local authorities funding to offset higher fees from care providers and other commissioned services.

- 1.7 The savings requirement was calculated to ensure that the Council can set a balanced budget in 2025/26, within the current MTFS assumptions, by adding growth to the Housing budget to fund pressures in the provision of homelessness services and temporary accommodation. The government has indicated that 2026/27 will see the first multi-year local government finance settlement in ten years. This development would be a welcome one for Brent, providing some much needed clarity on what funding will be available to support the budget over the MTFS period and narrowing the range of possible budget gaps. However, it is clear that unless additional funding is forthcoming, further savings and budget reductions will be required.
- 1.8 The provisional local government finance settlement increased core spending power for Brent by 6.2%, including a 'referendum limit' for Council Tax of 4.99% (where 2% is ring fenced for Adult Social Care). Like last year, the Government's financing assumption is that all Councils would act on this. The decision on Council Tax will be taken by Full Council, but the budget has been constructed on the basis of a 4.99% rise in the Brent element of Council Tax, which is consistent with the previous position of increasing Council Tax by the maximum amount allowable under the legislation. In addition, this is based on taking into account the rising inflationary pressures that the Council is subject to, the financial position in the round, the need to protect frontline services such as social care and homelessness and the results of consultation through Brent Connects and other meetings held by the date of dispatch of this report. Further details regarding decisions on Council Tax, including support for residents that are financially vulnerable, are set out in section seven of this report.
- 1.9 The Mayor of London has announced plans for an increase in his precept of 4.0% (slightly different rules on the limits for the Greater London Authority (GLA) apply due to its role as the police authority) making the overall increase in Council Tax 4.8%. This equates to £2,133.15 at Band D, or the equivalent of £41.02 per week, and the overall increase equates to £1.87 per week for a Band D property.
- 1.10 The provisional settlement for Brent was above the national and London averages and the September 2024 rate of Consumer Price Index (CPI) inflation, but was lower than the average for authorities with similar levels of deprivation. This settlement also follows a poor 2024/25 settlement for Brent, in which Brent received the lowest increase of any of the London boroughs and the previous government had to make a Guaranteed Funding Payment to keep the total value of the settlement at the safety net level.
- 1.11 The settlement provided limited additional resources, and the funding that was provided has been used to offset new pressures that have arisen since the draft budget was presented to Cabinet in November 2024, including the expected costs of the changes to National Insurance from 2025/26 and in-year pressures from 2024/25 that are expected to continue into 2025/26. However, due to the

prudent approach taken to producing the draft budget in advance of the settlement, the savings requirement for 2025/26 remains the same as proposed in the draft budget in November 2024.

1.12 As the settlement was another single year settlement and the government has not (as of the date of dispatch of this report) begun the process of consulting on their proposed reforms, the 2025/26 settlement does not result in any major changes to the budget or MTFs position and little of the detail of these proposals is known at this time. Brent will engage with any consultations and the implications for the MTFs will be presented to Cabinet at the earliest opportunity.

1.13 Given the significant financial uncertainties that have been highlighted throughout this process, this is a balanced and proportionate approach to the demanding choices that must be confronted in budget setting. It should be recognised, however, that forecasting over the medium term has been, and continues to be, extremely difficult. There is a high level of uncertainty due to continued global conflicts, stubbornly high inflation, continued high interest rates, low growth in the economy, the effects of the cost-of-living crisis on residents and businesses in the borough and demographic changes. The significance of the financial challenge cannot be underestimated; however, the measures outlined in this report aim to ensure that the Council continues to operate in a financially sustainable and resilient way.

1.14 Aside from the updating of and adjustments to various technical assumptions the key features of this budget are:

- A Council Tax rise of 4.99% for the Brent element, making a Band D Council Tax of £1,642.77. Additionally, the Council will levy a Council Tax precept currently expected to be £490.38 at Band D on behalf of the GLA. Therefore, the total Council Tax at Band D is expected to be £2,133.15, which is an overall increase of 4.8%.

1.15 New budget savings proposals with an aggregate value of £4.5m to be delivered in 2025/26, as set out in Appendix C (ii). This is an addition to the £4.4m of existing savings for 2025/26 agreed by Full Council in February 2024 and set out in Appendix C (i). Together with £5m of additional Council Tax income resulting from the proposed changes to the Council Tax Support Scheme and £6.5m of operating efficiencies, this closes the £16m budget gap identified in July 2024.

1.16 This report is structured as follows:

- Foreword from the lead Cabinet member;
- Strategic overview of the financial and macro-economic climate;
- Summary of the processes taken to develop the budget;
- Update on the 2024/25 revenue budget and review of the key budget assumptions;
- The results of consultation, scrutiny and equalities are set out;
- Updates from the Council's ring fenced budgets, specifically the Housing Revenue Account (HRA) and the Dedicated Schools Grant (DSG);

- The capital programme is set out, along with the associated capital strategy, investment strategy and treasury management strategy.

2.0 Recommendation(s)

Cabinet

- 2.1 Agree to recommend to Full Council an overall 4.99% increase in the Council's element of Council Tax for 2025/26, with 2% as a precept for Adult Social Care and a 2.99% general increase.
- 2.2 Agree to recommend to Full Council the General Fund revenue budget for 2025/26, as summarised in Appendices A and B.
- 2.3 Agree to recommend to Full Council the savings proposals for 2025/26 as set out in Appendices C (i) and C (ii).
- 2.4 Note the Equalities Impact Assessments on the budget proposals, as set out in Appendices C (iii) and C (iv).
- 2.5 Note the report from the Budget Scrutiny Task Group in Appendix D.
- 2.6 Agree to recommend to Full Council the HRA budget and business plan for 2025/26, as set out in section eight and appendix O of this report.
- 2.7 Agree the HRA rents for council dwellings, tenant service charges and garages as set out in section eight of this report.
- 2.8 Agree the rents set under the Housing General Fund for Brent Housing PFI and traveller's site pitches and to note the rents for Hillside dwellings as set out in section eight of this report.
- 2.9 Note the Dedicated Schools Grant, as set out in section nine of this report.
- 2.10 Agree to recommend to Full Council the changes to the existing Capital Programme in relation to additions of new schemes and reprofiling, as set out in section ten of this report, and note the Capital Pipeline Schemes in Appendix E.
- 2.11 Agree to recommend to Full Council the Capital Strategy, the Non-Treasury Investment Strategy, the Treasury Management Strategy and the Minimum Revenue Provision Statement as set out in Appendices F, G, H and I.
- 2.12 Agree to recommend to Full Council the Reserves Strategy and schedule of reserves, as set out in Appendices J (i) and J (ii).
- 2.13 Agree, and where relevant agree to recommend to Full Council the schedule of fees and charges, as set out in Appendix K (ii).
- 2.14 Note the results of the budget consultation, as set out in section seven and detailed in Appendices L (i) and L (ii)

- 2.15 Note the legal advice from the Corporate Director, Law and Governance, as set out in Appendix M.
- 2.16 Note the decision of the Corporate Director, Finance and Resources to continue as part of the Eight Authority Business Rates pool in 2025/26 as set out in section six of this report.
- 2.17 Note the changes to waste policy, notably the Extended Producer Responsibility (ERP) for packaging from 2025 and agree to recommend to Full Council for the funding to be transferred to reserves in 2025/26.

Full Council

- 2.18 Agree an overall 4.99% increase in the Council's element of Council Tax for 2025/26, with 2% as a precept for Adult Social Care and a 2.99% general increase.
- 2.19 Agree the General Fund revenue budget for 2025/26, as summarised in Appendices A and B.
- 2.20 Agree the savings proposals for 2025/26, as set out in Appendices C (i) and C (ii).
- 2.21 Agree that in the event the proposed amendments to the Council Tax Support scheme are not approved by Full Council, £5m of reserves will be used to cover the budget shortfall in 2025/26, as set out in section 6.18.
- 2.22 Note the Equalities Impact Assessments on the budget proposals, as set out in Appendices C (iii) and C (iv).
- 2.23 Note the report from the Budget Scrutiny Task Group in Appendix D.
- 2.24 Note and agree inclusion of the HRA budget and business plan in the overall Council budget for 2025/26 as set out in section eight and appendix O of this report.
- 2.25 Agree the Dedicated Schools Grant, as set out in section nine of this report.
- 2.26 Agree the changes to the existing Capital Programme in relation to additions of new schemes and reprofiling, as set out in section ten of this report, and note the Capital Pipeline Schemes in Appendix E.
- 2.27 Agree the Capital Strategy, the Non-Treasury Investment Strategy, the Treasury Management Strategy and the Minimum Revenue Provision Statement as set out in Appendices F, G, H and I.
- 2.28 Agree the Reserves Strategy and schedule of reserves, as set out in Appendices J (i) and J (ii).

- 2.29 Agree the schedule of fees and charges, as set out in Appendix K (ii).
- 2.30 Note the results of the budget consultation, as set out in section seven and detailed in Appendices L (i) and L (ii).
- 2.31 Note the legal advice from the Corporate Director, Law and Governance, as set out in Appendix M.
- 2.32 Agree the Pay Policy Statement for 2025/26, as set out in Appendix N.
- 2.33 Agree to transfer the funding from the Extended Producer Responsibility (ERP) for packaging scheme to reserves in 2025/26.

Council Tax recommendations

- 2.34 In relation to the Council Tax for 2025/26 we resolve:

That the following amounts be now calculated as the Council's element by the Council for the year 2025/26 in accordance with Sections 31 to 36 of the Local Government Finance Act 1992 as amended:

(a) £1,127,293,760 being the aggregate of the amount that the Council estimates for the items set out in Section 31A(2) of the Act.

(b) £948,861,011 being the aggregate of the amounts that the Council estimates for the items set out in Section 31A(3) of the Act.

(c) £178,432,749 being the amount by which the aggregate at (a) above exceeds the aggregate at (b) above, calculated by the Council, in accordance with Section 31A(4) of the Act, as its Council Tax requirement for the year.

(d) £1,642.77 being the amount at (c) above, divided by the amount for the tax base of 108,617, agreed by the General Purposes Committee on the 15 January 2025, calculated by the Council, in accordance with Section 31B of the Act, as the basic amount of its Council Tax for the year.

(e) Table 1: Brent Valuation Bands

A	B	C	D	E	F	G	H
£	£	£	£	£	£	£	£
1,095.18	1,277.71	1,460.24	1,642.77	2,007.83	2,372.89	2,737.95	3,285.54

being the amounts given by multiplying the amount at (d) above by the number which, in the proportion set out in Section 5(1) of the Act, is applicable to dwellings listed in a particular valuation band divided by the number which in that proportion is applicable to dwellings listed in valuation band D, calculated

by the Council, in accordance with Section 36(1) of the Act, as the amounts to be taken into account for the year in respect of categories of dwellings listed in different valuation bands.

- 2.35 That it be noted that for the year 2025/26 the proposed GLA precept issued to the Council, in accordance with Section 40 of the Local Government Finance Act 1992, in respect of the GLA, for each of the categories of dwellings are as shown below:

Table 2: GLA Valuation Bands

A	B	C	D	E	F	G	H
£	£	£	£	£	£	£	£
326.92	381.41	435.89	490.38	599.35	708.33	817.30	980.76

- 2.36 That, having calculated the aggregate of the amounts at paragraph 2.34(e) and 2.35 the Council, in accordance with Section 30(2) of the Local Government Finance Act 1992, hereby sets the following amounts as the amounts of council tax for the year 2025/26 for each of the categories of dwellings shown below:

Table 3: Overall Valuation Bands

A	B	C	D	E	F	G	H
£	£	£	£	£	£	£	£
1,422.10	1,659.12	1,896.13	2,133.15	2,607.18	3,081.22	3,555.25	4,266.30

- 2.37 That it be noted that the Corporate Director, Finance and Resources has determined that the Council element of the basic amount of Council Tax for 2025/26 is not excessive in accordance with the principles approved under Section 52ZB of the Local Government Finance Act 1992.

- (a) That the Corporate Director, Finance and Resources be and is hereby authorised to give due notice of the said Council Tax in the manner provided by Section 38(2) of the 1992 Act.
- (b) That the Corporate Director, Finance and Resources be and is hereby authorised when necessary to apply for a summons against any Council Taxpayer or non-domestic ratepayer on whom an account for the said tax or rate and any arrears has been duly served and who has failed to pay the amounts due to take all subsequent necessary action to recover them promptly.
- (c) That the Corporate Director, Finance and Resources be and is hereby authorised to collect revenues and distribute monies from the Collection

Fund and is authorised to borrow or to lend money in accordance with the regulations to the maximum benefit of each fund.

3.0 Cabinet Member Foreword

- 3.1 Fiscal discipline is a fundamental value of our administration. Despite many difficult settlements over the previous decade and a half, we have ensured that the foundations of our council are strong and that we can continue to deliver excellent services to residents. It is because of this long-term commitment to credibility that we can again present a fully balanced Budget to Full Council for approval.
- 3.2 As ever, this year's Budget was a team effort with many officers working to this pack. I want to thank them all for their efforts. Our commitment to clear and transparent presentation of the facts as they are, not as we wish them to be, is a commitment that we have made across this administration. Every year it is an iterative process and evolution upon the last budget, and we welcome any feedback as we look again to next year.
- 3.3 I also want to thank all those that took part in the budget consultation, including residents who took part in the formal consultation and all those that attended our Brent Connects meetings around the borough. Particular recognition must go to those councillors who took part in the Budget Scrutiny process – expertly led by Cllr Rita Conneely – for asking the difficult but necessary questions and ensuring we were certain of our plans and figures.
- 3.4 Local government across England and Wales is about to be significantly reformed. This is to be welcomed, our democracy should be organised in a way which maximises growth and allows every part of our great country to attract investment and fulfil its potential. Whilst London might not be the focus of the Devolution White Paper we are determined to play a role in influencing its final composition and considering how we can work with government to deliver local growth.
- 3.5 As noted above, our approach to fiscal discipline is non-negotiable and we will continue to deliver balanced and credible budgets in the years ahead. This is not just an abstract principle but vitally important to the functioning of the council. Across London, more than a dozen councils have had little choice but to approach government for Exceptional Financial Support. These boroughs are borrowing to avoid failure, but this is not sustainable and it is Brent's determination to avoid such extremes.
- 3.6 We look forward to the Chancellor's spending review and spring forecast statement. There is much to be welcomed in the new government's approach, one serious about fixing the foundations of local government and responding to the needs of the country. The Devolution White Paper acknowledges so many of the latent errors of the years of austerity, but now is the time to be bolder, to be courageous, and to re-wire the way that we think about what local government truly means, and what it is set up to do. We have always made the case that local authorities are an additional emergency service, the safety net where other

services recede, and we collectively contribute more than any other branch of government towards the look, feel and prosperity of neighbourhoods up and down this country.

- 3.7 Brent Council remains committed to delivering not just essential services, but those that matter most to our residents. This budget protects those frontline services, while also ensuring that we maximise value for taxpayers, and continue to seek improvements to services wherever they can be found. We have not shied away from the challenges of the last year, and this report details the complex, London-wide Housing pressures which continue to place this council at sustained financial risk.
- 3.8 Our in-year overspend on Housing remains substantial. At the last financial quarter, this was reported as £17.4m and has been driven by rising homelessness and increased pressures within Housing Services (£15m), alongside new financial strains in Children and Young People (CYP) and Community Health and Wellbeing (CHW). While £8m of in-year savings have been identified to mitigate some of these pressures, the financial landscape remains extremely challenging.
- 3.9 Neither our residents nor the council created the Housing Emergency that we see today, but there is no doubt that both are profoundly impacted by it. Recent estimates suggest that over the last decade, as our city has grown, Brent has seen the highest recorded increase in private rents, with an average increase of 58.4%.
- 3.10 We have little other choice but to shape our financial plans around this reality. In February 2024, full Council approved £12.5m in cuts, profiled over two years, with £4.4m of these detailed once again within the report today. But that is still not close to filling the financial gap for this forthcoming financial year. Members are therefore asked today to agree a further £16m in proposals, broken down by a 4.99% increase in Council Tax, £6.5m of operational efficiencies, a further £4.5m in new cuts, and, most painful of all, a £5m reduction to our Council Tax Support Scheme.
- 3.11 The reports today lay bare how we are responding to this financial reality in the most equitable way possible. Taken together, we have updated our Medium-Term Financial Strategy to reflect the challenges before us, and we have set out both individual and cumulative equality impact assessments for all our proposals too. There is no doubt, though, that what we have put forward will have an impact on the council, on our residents, and on our partners alike.
- 3.12 By the end of 2025, the cumulative total of cuts made since 2010 will reach an astounding £238m—equivalent to nearly half of Brent's annual budget today. In that same period, we have reduced the overall number of staff employed by the council by half, becoming a leaner and more efficient organisation. This inherently has changed the nature of how we provide our services and will continue to in the financial years to come. We know that in both housing and social care, we still have more challenges to face.

- 3.13 The Provisional Local Government Finance Settlement for 2025/26 has increased Brent's core spending power by a welcome 6.2%, but the increase in employer National Insurance contributions has also created new cost pressures.
- 3.14 Brent's settlement was above both the national and London averages, but is still lower than the funding received by authorities with similar levels of deprivation. This follows a particularly poor settlement in 2024/25, where Brent received the lowest increase of any London borough and required a Guaranteed Funding Payment to maintain a safe funding level. Thankfully, due to the prudent approach taken to producing the draft budget in advance of the settlement, the savings requirement for 2025/26 remains unchanged at £16m.
- 3.15 Financial forecasting remains complex due to ongoing global uncertainties, including the conflict in Ukraine. There is still much to be proud of though, and our Administration's Priorities and Capital Programme speak to our very real ambition to making change happen in our borough.
- 3.16 The Government has announced plans to reform local government financing from 2026/27, prioritising support for the most financially strained authorities and implementing the first reset of the business rates retention system since its inception. While this is a welcome development, Brent still faces an estimated £28m budget gap up to 2029, necessitating an average of just over £9m in cuts per year. In addition to the introduction of multi-year budgets, we hope ministers will seize this opportunity to write a new chapter for local government.
- 3.17 Despite these immense pressures, our ironclad commitment to supporting our residents, protecting the most vulnerable, and investing in Brent's future is the golden thread throughout this budget report. We will continue to advocate for a fairer funding settlement that ensures we can successfully navigate the financial waters ahead. Today's report will continue to enable the Council to set a balanced budget in 2025/26, in accordance with our statutory obligations and in alignment with the principles set out in our Borough Plan (2023-2027).

4.0 Strategic Overview

MTFS Update

- 4.1 Brent has delivered total cumulative savings of £218m between 2010 and 2025. The proposed savings for 2025/26 (Appendix C (ii)), in addition to those agreed in February 2024 (Appendix C (i)) will take this total to £238m (55% of the net revenue budget for 2025/26).
- 4.2 The new government has stated its intentions to reform local government financing from 2026/27, with particular focus on diverting resources to authorities that need them most and delivering the first reset of the business rates retention system since it was created in 2013. Although a consultation on future funding reforms has been announced, until there are further details on the impact and transition to these reforms, it makes it extremely challenging to be precise about future financial targets. Likewise, the government has increased employer

National Insurance Contributions without providing local authorities funding to offset higher fees from care providers and other commissioned services.

- 4.3 The MTFFS model has been extended to 2028/29 to cover what is expected to be a three year settlement from 2026/27. The model will be extended further to five years once the government has completed the upcoming funding review. Budget assumptions on income and expenditure have been reviewed and updated and rolled over and there is now an estimated budget gap for 2026/27 to 2028/29 of £28m, which will require an average of just over £9m of savings in each year (up from the £7m estimate in July 2024 for the first two years). Table 4 shows how this budget gap is distributed across the MTFFS period.

Table 4: Budget gap 2026/27 to 2028/29

	2026/27 (£m)	2027/28 (£m)	2028/29 (£m)
In year budget gap	9.3	9.3	9.4
Cumulative budget gap	9.3	18.6	28.0

- 4.4 Table 4 includes items known at the time of dispatch of this report. As the budget continues to be developed throughout 2025/26, new pressures may arise, or additional in-year savings may be achieved, which will either increase or decrease the forecast budget gap. It is important to note that these figures include several assumptions around future budget growth requirements, interest rates and inflation, which could get worse as well as better. For example, if interest rates remain high and inflation rises again, this would increase the budget gap further. It is also important to note that the financial assumptions could improve, for example if demand led pressures are less than anticipated, this would reduce the forecasted budget gap.
- 4.5 During the Spring, these estimates will be refined and a further update will be brought to Cabinet in summer 2025, at which point the budget strategy for 2026/27 will be set out. The process of identifying these savings will be a major factor in the construction of the 2026/27 budget, enabling the Council to set a balanced budget for 2026/27, with the draft budget presented to Cabinet in autumn 2025.
- 4.6 During this process sufficient information may become available, through the consultation on the proposed reforms to local government financing, to enable Brent to plan more effectively across multiple years. In this scenario, the Council may decide to set savings targets for 2027/28 and 2028/29, in order to provide greater certainty to services and residents on what the required changes will be over the MTFFS period.
- 4.7 Whether the Council is able to set a multi-year budget in 2026/27 or not, it is clear that the Council will need to take difficult decisions about which services to

prioritise and protect and which to reduce in order to continue to deliver affordable and sustainable budgets.

Financial Context

- 4.8 In February 2024, Council agreed the budget for 2024/25, which included £12.5m of savings, with £4.4m to be delivered in 2025/26. It was estimated in July 2024 that a further £30m of savings would be required across the Medium Term Financial Strategy period from 2025/26 to 2027/28, profiled £16m in 2025/26, £7m in 2026/27 and £7m in 2027/28. As a result, the total estimated savings requirement for 2025/26, as of the draft budget in November 2024, was £20.4m.
- 4.9 Reports on the budget position have been brought to Cabinet throughout the year, most recently in July and November 2024. In January 2025 Cabinet also received the Quarter 3 forecast position for 2024/25, which set out a forecast overspend of £17.4m. The forecast overspend is primarily within the Housing service (£15m), which has been experiencing high levels of demand since 2023 due to a rise in homelessness and a reduction in the supply of suitable temporary accommodation. Additionally, new pressures have arisen within the Children & Young People and Community, Health & Wellbeing directorates. These pressures are being partially offset by £8m of in-year savings that have been identified across the Council, which are part of a package of new measures to provide more assurance over the Council's spending decisions, in order to contain identified pressures as much as possible.
- 4.10 In November 2024, Cabinet received a report, which set out the draft budget for 2025/26, including £16m of new proposed savings to close the budget gap identified at the MTFS update in July 2024. This is broken down as follows:
- £4.5m of savings proposals from services (Appendix C (ii))
 - £5.0m of additional Council Tax income resulting from changes to Council Tax Support (to be approved by Full Council alongside the Budget & Council Tax report on 27 February 2025)
 - £6.5m of operating efficiencies to be delivered by services in 2025/26
- 4.11 The savings approved in February 2024 are included in Appendix C (i). The new savings proposals to be approved by Full Council in February 2025 are summarised in Appendix C (ii), with their associated equalities impact assessments in Appendices C (iii) and C (iv).
- 4.12 The proposed changes to the Council Tax Support Scheme are to be presented to Full Council for approval alongside the Budget & Council Tax Report on 27 February 2025. The changes are subject to separate consultations and equalities impact assessments, with the details set out in that report. The budget has been constructed on the basis that the changes will be approved, but further detail is provided in Section 6.18 on the actions required if the changes are not approved.
- 4.13 The £6.5m of operating efficiencies are savings that will be delivered within the normal operation of the Council's services and as such have been agreed under the powers delegated to the Directors under the Council's constitution. These

savings are in large part an extension of existing spending controls, deleting vacant posts, savings from the voluntary redundancy scheme and bringing forward and/or extending previously agreed savings such as reducing voids in supported living, renegotiating placements and automation of administrative processes. By their nature, these do not require public consultation and are considered business as usual activities to reduce costs. This will be monitored as part of the existing budget monitoring process and the Council's performance monitoring framework, with the relevant Key Performance Indicators (KPIs) to be updated accordingly.

- 4.14 In summary, these proposals and the budget assumptions set out in this report, will enable the Council to set a balanced budget for 2025/26 and ensure that the Council continues to operate in a financially sustainable and resilient way.

Current financial position

Uncertain Economic Environment

- 4.15 There is a high level of uncertainty in the economic environment in which Brent Council operates due to continued global conflicts, stubbornly high inflation, continued high interest rates, low growth in the economy, the effects of the cost-of-living crisis on residents and businesses in the borough and demographic changes.
- 4.16 The ongoing cost-of-living crisis will continue to impact on the lives of the residents of Brent in 2025/26 and the Council is committed to doing what it can to support those in greatest need.
- 4.17 Service demand continues to rise due to demographic changes which affect all age groups and continued inflationary pressures are causing providers to raise their prices, which impacts the Council as a whole, with particular pressure on adults' and children's social care and homelessness budgets.

Inflation

- 4.18 Consumer Price Index (CPI) inflation, briefly fell below the Bank of England's 2% target for the first time since April 2021, when it reached 1.7% in September 2024, the month that is used to uprate many government grants and the standard business rates multiplier for 2025/26. Since then, CPI has risen again to 2.5%, driven by higher transport and recreational costs.
- 4.19 At the time of dispatch of the draft budget report in November 2024, forecasts for CPI inflation in 2025 varied between 1.5% and 3.3%, with a median of 2.1%. The report acknowledged the risk that increased inflation in the last quarter of 2024 would mean that government grant income for the Council would not meet the actual inflationary pressures being experienced. With inflation recently increasing and 0.4% above the median of the forecasts for 2025/26, this report must acknowledge the risk that this gap will widen further throughout 2025 if inflation remains higher than previously expected.

Interest Rates

- 4.20 In December 2024, the Bank of England's Monetary Policy Committee (MPC) voted to keep the base rate unchanged at 4.75%, having previously reduced the rate twice in the second half of 2024 from the recent high of 5.25%. The MPC vote was split, with some members advocating a further cut, citing concerns over slowing demand and a weakening labour market, while others took a more cautious stance following the recent increase to inflation.
- 4.21 In the Office for Budget Responsibility's (OBR) forecast alongside the Autumn Budget, they forecast that interest rates would fall more slowly than previously expected, before settling at 3.5%, 0.5% higher than they had forecast at the time of the Spring Budget in March 2024.
- 4.22 Higher interest rates increase the cost of borrowing for all organisations, Brent Council included. The holding of interest rates at a higher level for longer may have an impact on the Council's ability to use borrowing to fund capital investment our residents rely on in the Borough. Future policy decisions regarding interest rates are dependent upon UK economic data with the Bank monitoring both inflation and employment.

Growth

- 4.23 In the Office of National Statistics (ONS) December 2024 release of Gross Domestic Product (GDP) data, it was shown that the economy did not grow in the third quarter of 2024, following growth of 0.7% in Q1 2024 and 0.4% in Q2 2024. This followed a brief recession at the end of 2023, with a clear pattern of low growth in the UK economy.
- 4.24 As a result of this, the Organisation for Economic Co-operation and Development (OECD) revised down its previous prediction of 1.1% growth for 2024 to 0.9%. Previous forecasts for 2025 have varied from 0.8% to 1.6%, with a median of 1.3%. This is slightly higher than current growth, but is unlikely to be sufficient to significantly help many of those people still suffering from the cost-of-living crisis.

Employment

- 4.25 One of the areas of greatest uncertainty for 2025 is the forecast increase or reduction in employment. At the time of the draft budget, this ranged from a 0.6% reduction in employment to a 1.2% increase in employment, with a median of a 0.6% increase in employment. All recent data has pointed to a relatively stable employment environment.
- 4.26 Wage pressures continue to persist with average earnings rising by 5.2% over the three months to October, outpacing market expectations, with the increase driven by private sector pay. Previous forecasts were for median growth in earnings of 3.6% in 2025, but the recent data suggests that this may be too low. In either case, it is likely that wages will grow faster in 2025 than CPI inflation and the income gap between those in employment and those out of employment will continue to grow.

Provisional Local Government Finance Settlement (18 December 2024)

- 4.27 The 2025/26 Local Government Finance Settlement is the seventh annual one-year settlement for local government. One-year settlements are necessary when there is only a single year's funding remaining within the horizon of the most recent Spending Review, or there is uncertainty over the policy framework for future years. Certainly, there has been for some time, disruption in government which inhibits longer term decision making. But the consequences for local government are significant in terms of short-term planning and obstacles to much-needed reforms.
- 4.28 However, following the change of government in July 2024, the new government has committed to fundamental reforms of local government financing and as part of this will deliver a multi-year settlement in 2026/27. This will provide greater certainty within which to plan budgets for future years.
- 4.29 Government announced in the Settlement that local government in England would receive a real-terms increase of 3.5% in Core Spending Power. While this amount is in line with the average annual increases since 2019, it is still 9% lower in real terms than in 2010.
- 4.30 The broad policy approach for the settlement is the following:
- A roll-over for the core elements of the settlement, preserving current distributions, and continuation of other features (such as enhanced business rates retention in some areas, and support to eliminate so-called 'negative Revenue Support Grant')
 - Repurposing a number of smaller grants in order to target more funding towards authorities that have weak tax bases and high levels of need and service demand
 - extra funding for priority services, namely Adult Social Care and Children's Social Care
 - striking a balance between raising resources locally for funding pressures and protecting local taxpayers, through council tax referendum principles
 - a further one-off funding floor, which acts as a fallback to ensure that no councils will see a reduction in their Core Spending Power before they take decisions on council tax levels.
 - A permanent shift in power away from the centre, towards people and communities.
- 4.31 The declared aim of this year's settlement is to begin the process of funding reforms to enable local government to focus on delivering for residents and providing high quality, vital frontline services that people rely on every day. The settlement acknowledges that the current system for funding local authorities does not represent best value for taxpayers and that without action it will get worse.
- 4.32 The changes included in this year's settlement are relatively minor and most of the key policy decisions that will affect Brent, including the business rates reset,

are delayed until 2026/27. However, the redistribution of some existing funding within the settlement and statements by government ministers are indicative of their intention to implement fundamental reforms from 2026/27. This is welcome given that the funding formula was last updated in 2013/14, and the Fair Funding Review was launched in 2016, with implementation delayed multiple times.

- 4.33 The settlement also confirmed the Council Tax referendum limits for 2025/26. The increase in Core Spending Power provided to Brent is predicated on the Council raising its Council Tax by the referendum limit of 2.99% and levying an Adult Social Care precept of 2% (a 4.99% total increase).
- 4.34 Overall, inclusive of the proposed 4.99% increase to the Council Tax precept, Brent's Core Spending Power has increased by 6.2%. This is 0.6% higher than the national average, 1.3% higher than the London average and 3.6% higher than the average CPI inflation figure for the 12 months to November 2024.
- 4.35 However, while the Index of Multiple Deprivation shows that Brent has higher levels of deprivation than many authorities, the increase to Core Spending Power is 0.4% lower than the average for similar authorities. This settlement also follows a poor 2024/25 settlement for Brent, in which Brent received the lowest increase of any of the London boroughs and as a result was provided with a Guaranteed Funding Payment to keep the total value of the settlement at the safety net level.

Administration Priorities

- 4.36 The budget process is designed to ensure that it is priority led so that resources are aligned with statutory responsibilities and council priorities, which are set out in the four-year Borough Plan (2023-2027).
- 4.37 The Borough Plan 2023-2027 sets out the Council's vision for the four-year period covered by the plan. There is an emphasis on how the Council will work with others to support people through the cost-of-living crisis and harness the diverse range of communities. Central to these ambitions is making Brent the best it can be for everyone who lives and works in the borough.
- 4.38 The overarching theme of the plan is 'Moving Brent Forward Together'. The plan focuses on how the Council will take forward delivery in the five priority areas being of fundamental importance to Brent and its people. Each priority area has set outcomes the Council will work towards, building on the achievements so far with renewed focus and actions. It tackles cross-cutting issues such as homelessness and health inequalities. The five priorities are:
- Prosperity and Stability in Brent
 - A Cleaner, Greener Future
 - Thriving Communities
 - The Best Start In Life
 - A Healthier Brent
- 4.39 This year, as always, the Council will continue to deliver on these priorities, including:

4.40 Prosperity and Stability in Brent

- £31.4m towards delivering 1,700 new safe and secure homes by 2028.
- £10.4m raising standards for private renters.
- £1m to help residents cope with rising costs and tackling fuel and food poverty.
- £500k connecting people with new jobs through Brent Works.
- £2.9m giving people of all ages more opportunities to develop their skills through Brent Start.

4.41 A Cleaner, Greener Future

- £8.2m looking after 315 miles of road and 529 miles of pavement.
- £700k on reactive repairs, such as filling around 10,700 potholes.
- £2.3m maintaining Brent's 110 award-winning parks and open spaces.
- £21.6m collecting rubbish and recycling from 127,974 homes and on keeping our streets clean.

4.42 Thriving Communities

- £3m on Brent's Library, Arts and Heritage service, welcoming over 1m visits per year.
- £300k on cultural activities to build on the Brent 2020 legacy.
- £1.5m on community projects to empower local people and community groups to improve their neighbourhoods.

4.43 The Best Start in Life

- £44m creating 427 new school places for children with special educational needs.
- £397m funding Brent's 97% good and outstanding schools and settings.
- £900k looking after eligible children and young people during the school holidays.

4.44 A Healthier Brent

- £117.9m supporting over 4,600 elderly and vulnerable residents with vital social care support.
- £24.3m on improving people's health and wellbeing.
- £4.2m supporting residents to look after their wellbeing in Brent's leisure centres.

4.45 As is customary during the budget setting process, the MTFs will need to ensure it provides a framework to enable and support the delivery of these programmes.

Strategic Change Programme

4.46 The Council began work on balancing the budget for 2025/26 and beyond before the 2024/25 budget was formally approved by Full Council. Due to the significant size of the forecast budget gap our continued aim is not to only achieve savings through an apportionment approach by Directorate, but ensuring that the Council challenges itself to be more cost effective by working smarter and more efficiently, being ambitious and innovative.

4.47 To make this aim a reality, we began the Strategic Change Programme in late Spring of 2024 to drive a radical new approach across the organisation, with staff who are positive, empowered, accountable and confident to try new things. It will run until 2026 and has the following aims:

- Enable the delivery of Council priorities as set out in the Borough Plan
- Support our financial sustainability
- Develop a workforce fit for the future.

4.48 The core of the change programme is embracing our role as a place leader, listening properly to the aspirations of local people and the approaches that work for them, focusing on prevention, and collaborating with communities and partner organisations to make the biggest difference with every pound that's spent in Brent.

4.49 Our initial discovery work has uncovered a large opportunity to build a more strategic approach to working with key partners – deepening those partnerships with the voluntary, community and faith sector organisations as well as business and anchor institutions that help us to address local priorities and tackle social issues. We are also accelerating the opportunities presented by better use of data, community insights, new technology and hyperlocal ways of working.

4.50 Through stronger joint working and partnerships, we can have the biggest collective impact with every pound that's spent in this tough financial climate and crucially secure the best possible outcomes for our residents. Working with a borough-wide group of partners, we are looking at how we best develop our approach to Integrated Neighbourhood Teams, using shared data, insight and local knowledge to identify specific cohorts of people to work with in ways designed to prevent them from falling into crisis.

4.51 We are also working to align with and build on existing plans led by health partners for neighbourhood working, and plan to pilot this approach, starting in April 2025. It is ambitious, but if successful, this programme will fundamentally transform the way we organise and provide services.

5.0 Budget Development Process 2025/26

5.1 The budget development process for the Council to set its budget and council tax for 2025/26 was as follows:

- Meetings involving Cabinet and Corporate Management Team members to consider the key service and budget issues likely to affect the council in future years;
- Development of budget proposals by officers and relevant Lead Members for individual services within the context of the Borough Plan and the overall resources available;
- Development of the budget approach, based on the updated medium term financial outlook, which was considered by the Cabinet on 12 November 2024;

- The publication of a detailed list of savings proposals at Cabinet in November 2024 for the purposes of consultation, scrutiny and equality analyses;
- Debates through the Budget Scrutiny Task Group of the Resources and Public Realm Scrutiny Committee;
- Presentations and question and answer sessions at virtual Brent Connects meetings;
- Review of the schools budgets by the Schools Forum;
- Considering feedback from residents, businesses and other key stakeholders, whether received from the online consultation portal or other direct representations; and
- Conducting individual equality impact assessments (Appendix C (iii)) on the budget proposals and a cumulative equality impact assessment (Appendix C (iv)) on the overall budget in order to ensure that the consequences of the budget proposals were properly understood.
- Implementation of the External Auditor's Value for Money recommendations on financial sustainability.

5.2 This report updates the position on the core estimates that drive the Medium Term Financial Strategy assumptions, including the outcome of the final settlement and the consultation, scrutiny and equalities analyses processes.

6.0 Update and Review of Key Budget Assumptions

6.1 The 2025/26 Local Government Finance Settlement provided details of the core funding allocations for local authorities in 2025/26. The settlement is another one-year settlement, which does not help medium term planning. The settlement confirmed the funding announced in the Autumn Budget and the Local Government finance policy statement 2025 to 2026. The key headlines that are relevant for Brent from a budget setting point of view are set out below.

Revenue support grant (RSG) and other relevant grants

6.2 Revenue Support Grant (RSG) for 2025/26 is £31.5m an increase of 1.85% from the 2024/25 level. This is in line with the September CPI inflation figure.

6.3 Existing allocation methodologies have continued for social care funding. For Brent, this includes £16.5m Local Authority Better Care Grant (see below), £5.9m Market Sustainability and Improvement Fund (unchanged from 2024/25) and £34.4m Social Care Grant – an increase of £5.2m (18%). The flexibility to increase Council Tax to fund Adult Social Care (the Adult Social Care precept) remains at 2%. This increase is included in the recommended 4.99% increase to Brent's Council Tax precept and this is intended to provide £3.4m of recurring funding for adult social care.

6.4 The £16.5m Local Authority Better Care Grant is a new grant for 2025/26, formed from consolidating the Adult Social Care Discharge Grant (£3.1m 2024/25) with the Improved Better Care Fund (£13.4m 2024/25). Both elements of this grant remain unchanged from 2024/25, with the Improved Better Care Fund having

been fixed at that level since 2022/23. Like its predecessors, this grant will be required to be pooled into the Better Care Fund.

- 6.5 A new Children's Social Care Prevention Grant, worth £1.3m to Brent in 2025/26 has been allocated to fund the rollout of Family Help – a whole-family preventative service.
- 6.6 A new one-off Recovery Grant has been introduced in 2025/26 to target places with greater need and demand for services (using deprivation as a proxy) and less ability to raise income locally. Brent's share of this grant is £5.8m and the grant is not ringfenced. The government has been clear in its consultation on the provisional local government finance settlement that this grant will be replaced by the full funding reforms expected from 2026/27. It is therefore uncertain how much (if any) of this funding will continue in the base budget beyond 2025/26.
- 6.7 In 2024/25, Brent received £0.6m of Services Grant and £1.3m of Funding Guarantee. In 2025/26, Services Grant has been removed and the Funding Guarantee is now a Funding Floor, guaranteeing that no local authority sees a reduction in their Core Spending Power after taking into account the increase in council tax. As Brent has received an increase in Core Spending Power of 6.2%, no funding has been received from these grants in 2025/26. This results in a net increase of £3.9m in grants available for general revenue expenditure.
- 6.8 The New Homes Bonus allocation has fallen from £2.9m in 2024/25 to £1.9m in 2025/26. This is a loss of £1m of funds that would otherwise have been used to fund part of the capital programme, specifically the supply of new homes for the provision of temporary accommodation. The government has stated its intention in the provisional local government finance settlement for 2025/26 to be the final year of the New Homes Bonus in its current form and will consult on detailed proposals in the new financial year.
- 6.9 Outside of Core Spending Power, the Homelessness Prevention Grant has been uplifted by £192.9m to £633.2m in 2025/26. Brent's share of this funding has increased by £3.4m from £9.4m (including the £1.9m top-up to the original grant allocation in 2024/25) to £12.9m. A new ringfence has been created on this grant, which requires 49% of the allocation to be spent on prevention, relief and staffing activity.
- 6.10 An additional £515m has been provided in compensation for additional employer National Insurance Contributions, however allocations will not be confirmed until the Final Local Government Finance Settlement, expected in February 2025. The calculation for Brent using the methodology set out in the settlement comes to £3.6m, which is broadly in line with an estimate of the direct cost to Brent of the National Insurance increase for Brent employees. Additional costs are also expected as a result of increased costs for contracts and commissioned services, however funding for these costs have not been provided for within the provisional settlement. The potential impact of these unfunded new burdens are set out from section 6.43. Furthermore, this grant is not included in Core Spending Power and any funding could be one-off, with the increase subsequently required to be

budgeted for from 2026/27. Alternatively, the funding may be rolled into the settlement in 2026/27.

- 6.11 Overall, compared to the funding assumptions in the draft budget there is £19.4m of additional grant funding, of which £8.4m is ring fenced and £11m (social care grant and recovery grant) that can be used to fund specific pressures. While this new funding is welcome, there are new burdens that are unavoidable, primarily the indirect cost of employer National Insurance Contributions from contracts and commissioned services, notwithstanding existing inflationary and demand pressures. The impact on the reduction in National Insurance thresholds has a significant impact on the care sector, particularly for employers whose workforce is primarily part-time. For employees paid over £9,100, the additional employer's contribution arising as a result of the change to the threshold is £615 per employee. This is a significant increase in sectors with low average salaries or where employees work part-time, such as the care sector. This is a disproportionate increase compared to sectors with higher average salaries, where the impact of the increase to employer contributions is less of a burden. Overall, these additional unavoidable costs expected next year exceed the increase to general and new grants.

Council Tax

- 6.12 The settlement confirmed that Local Authorities will be able to increase Council Tax in 2025/26 by up to 2.99% without a local referendum. In addition, local authorities will be able to levy a 2% adult social care precept. This will provide total recurring funding of £16.3m, of which £7.8m relates to the increase in the tax base and £8.5m relates to the increase in council tax including the adult social care precept.
- 6.13 Like last year, the Government's financing assumption is that all councils will act on this and increase Council Tax by the maximum amount possible. It should be noted that the additional income generated through the Adult Social Care precept alone does not cover the total growth requirement for Adult Social Care pressures. However, the increase would permanently increase the council tax base income and it would also help to reduce the significant funding pressures in 2025/26 and beyond. Taking into account the unprecedented pressures within social care and the financial position in the round, the recommendation of this report is that the budget should be constructed on the basis of a Council Tax increase of 4.99% in 2025/26.
- 6.14 Of the £7.8m related to the increase in the tax base, £6.1m is Brent's share of the proposed changes to the Council Tax Support scheme, which will be presented to Full Council for approval alongside this report and £1.7m of other changes to the tax base.
- 6.15 Whilst it is acknowledged that increasing Council Tax will be difficult for some households and that some households who are currently receiving support through the Council Tax Support Scheme will have to pay more Council Tax, these proposed changes will result in a significant reduction of £8m in the cost to the Collection Fund of providing the support (£33m in 2024/25). Brent's share of

this reduction is included in the £16m of savings required to balance the 2025/26 budget, meaning that further savings from services provided to residents has been avoided.

- 6.16 Furthermore, the Council is investing £1.1m of this additional income in 2025/26 to create a Hardship Fund under which further support can be provided to residents who are experiencing difficulties as a result of this change, using the Council's existing powers to provide discretionary Council Tax discounts under Section 13A of the Local Government Finance Act 1992.
- 6.17 The consultation on the proposed changes to the Council Tax Reduction Scheme closed on 15 December 2024. Feedback from that consultation and an assessment of the equality impacts of the proposed changes are being considered by Cabinet, also on this agenda. Following the outcome of consultation and equalities impact assessments, the working assumption is that the amendments are approved by Full Council on 27 February 2025.
- 6.18 If the amendments to the Council Tax Support scheme are not approved by Full Council, the budget for 2025/26 will not be a balanced budget as alternative savings proposals have not been put forward as part of this budget setting round. Therefore, in the event of this scenario the proposal is to use £5m of reserves to cover the budget shortfall in 2025/26. As reserves can only be used once, £5m will have to be added to the budget gap in the Medium Term Financial Strategy and 2026/27 budget setting process.
- 6.19 Since the draft budget was presented to Cabinet in November 2024, a review of collection rates was undertaken as part of the calculation of the Council Tax Base for 2025/26, approved by General Purposes Committee on 15 January 2025. This review determined that it was necessary to reduce the target rate by 0.5% to 97.0%, as it was previously from 2022-2024, based on the long-term trends in the collection rate. The report acknowledged that a number of actions are currently being undertaken to improve the collection rate and that the target rate would be kept under review throughout 2025/26, with a view to updating it again if necessary for the 2026/27 budget setting cycle.
- 6.20 The reduction in the collection rate resulted in a decrease to the tax base which reduced the Council Tax income by £0.9m from the assumptions in the draft budget. The remaining £2.6m increase to the tax base is the result of underlying growth in the tax base, which remains unchanged from the assumptions in the draft budget following the Council Tax Base report.
- 6.21 Each financial year, the Mayor and London Assembly must prepare and approve a budget for each of the constituent bodies and a consolidated budget for the authority as a whole. At the date of dispatch of this report, the Mayor has proposed to increase the GLA precept by 4.0% to £490.38 per Band D property in the 32 London Boroughs. This would mean that the overall Council Tax would increase by 4.8%. This is 1% lower than the increase to the precept in 2024/25, because the referendum limit for the GLA in 2025/26 does not include an additional £20 increase for Transport for London (TfL). These figures are subject to change following the consultation process and confirmation of London

Boroughs' tax bases. The final GLA budget will be considered by the London Assembly on 25 February 2025.

Business Rates

Business Rates Multiplier

- 6.22 In accordance with the regulations, the business rates multiplier should increase by CPI, which was 1.7% in September 2024. The government can however choose to freeze the multiplier. When it does this, it compensates local authorities for the income foregone. As in previous years, the Government has decided to freeze the Small Business Rates Multiplier at 49.9p to protect small businesses from the impact of inflation. However, following changes introduced in the Non-Domestic Rating Act 2023, the Standard Business Rates Multiplier has been decoupled from the Small Business Rates Multiplier and is now indexed separately. For 2025/26, the Government decided to increase the Standard Business Rates Multiplier by CPI to 55.5p. The Standard Business Rates Multiplier applies to rateable values of £51,000 or more.
- 6.23 In 2025/26 the Government will once again provide an additional grant to compensate for the income lost due to the under-indexation of the multipliers both in 2025/26 and for previous years. This takes the total funding received by Brent under the business rates retention system to £125.1m.

Pooling

- 6.24 The Government has allowed Local Authorities with a geographic link to form a business rates pool. Brent is part of the Eight Authority Business Rates Pool (comprising the City of London Corporation as well as Tower Hamlets, Hackney, Haringey, Waltham Forest, Brent, Barnet and Enfield) and the settlement confirms that this arrangement will continue. In forming a pool, the group of authorities are seen as a single entity from a business rates perspective and as a result benefit from retaining and sharing the levy which the City of London and Tower Hamlets would otherwise have to pay. There will continue to be benefits from the pooling arrangement but the amount for 2025/26 will not be known until the statutory returns for all eight authorities have been audited. Final settlement of the pooling benefits will therefore be received in 2026/27 at the earliest. Brent's share of the benefits will be transferred to the General Fund with the other business rates income.

Reset of the Business Rates Retention system

- 6.25 The government confirmed in the Local Government Finance Policy Statement 2025 to 2026 that it intends to reset the Business Rates Retention system in 2026/27. This means that from 2026/27, Brent will have a new Business Rates baseline and will no longer be able to retain any growth above the current baseline, which was set in 2013/14. As a result of this change, it is likely that 2025/26 will be the final year of the current pooling arrangement as the benefits currently accruing to the members of the pool will cease to exist under the reset system. At present, this creates a high degree of uncertainty for the future funding

of the Council. Further details of the proposed reset will be set out by government in a consultation. Brent Council will engage with this consultation to ensure that the implications for the Council's Medium Term Financial Strategy are fully understood.

Revaluation

- 6.26 Since 1 April 2023, liabilities for business rates are based on the rateable value of properties on 1 April 2021. This revaluation was the first to take place since 2017 and resulted in either an increase or decrease to the business rates bills for individual businesses in line with the change in the open market annual rental value of the property between 2015 and 2021. The sector with the largest increase in rateable value overall in Brent was the industrial sector, with smaller increases for the retail, office and other sectors. Within each sector, some rateable values will have increased, while others decreased. In 2025/26, some businesses will see further increases to bills as transitional relief provided to reduce the impact of the change to the rateable value is removed. Following the introduction of the Non-Domestic Rating Act 2023, future revaluations will take place every three years, with the next scheduled for April 2026. Bills will also take into account any other reliefs that a property is eligible for, such as small business rates relief, ensuring that individual businesses are not disproportionately affected by changes to their rateable value.
- 6.27 Under the business rates retention system, revaluations have a nil impact on the funding received by the Council as the government adjusts the amount receivable by the Council to its Baseline Funding Level. However, the revaluation can impact on the levy calculation and therefore, changes to levies would be payable within the Eight Authority Business Rates Pool which could result in an increase or decrease to the benefit that is generated from the pooling arrangement.

Local Authority Funding Reform

- 6.28 At the same time as publishing the settlement, the government announced a consultation on the objectives and principles for local authority funding reform. This will update how local authorities are funded through the local government finance settlement. The consultation focuses on the objectives and principles for the review, however in the absence of detail and of numbers setting out the impact on the sector and on individual authorities will make it difficult to comment meaningfully. The aim is to establish consensus around the approach to the review, which will govern later steps and also narrow the scope for debate.
- 6.29 The proposals are set in a broader context of a planned shift of power away from the centre towards people and communities, including through the English Devolution White Paper, and efforts to set out and measure progress on key services and outcomes and to secure the highest standards in local government. There are further references to simplifying and consolidating the funding landscape; more emphasis on prevention, through place-based plans; identifying excessively burdensome activities and streamlining and rationalising reporting and evaluation requirements; and increasing flexibilities for fees and charges.

- 6.30 The case for funding reform is based on the argument that the allocation formulas are now more than 10 years out of date and no longer reflect relative need. As such, they fail to make best use of available public resources and offer poor value for money, with adverse impacts on financial resilience and those living in more deprived areas. The government commits to co-develop detailed proposals in a spirit of partnership between central and local government, consulting and engaging local authorities and others.
- 6.31 The reforms will be implemented through a multi-year settlement, beginning in 2026/27. A technical consultation on the planned reset of accumulated business rates retention growth is planned for early 2025. Consultation on detailed proposals will follow the multi-year Spending Review, which will conclude in 'late Spring', with a multi-year provisional settlement later in the year.
- 6.32 The government plans to base reforms on the following principles - dynamism, sustainability, robustness, stability and accountability. In essence, these require the reforms to be governed by an evidence-based policy approach, using the best available statistical techniques and the latest data, to arrive at a simpler, more transparent outcome. The main elements of reform are as set out below.

Relative Needs Assessment

- 6.33 Relative funding needs of authorities arising from differences in demand, are assessed through statistical formulas. A bespoke funding formula is proposed only for the largest and most significant service areas, with specific cost drivers. The consultation therefore proposes to simplify the existing approach with new bespoke formulas for adult social care; children, young people and family services; fire and rescue; and potentially highways maintenance. Each of these formulas should incorporate the most important factors which drive demand, however, little detail is provided on this. Potential cost drivers for the children's formula are listed, with detailed consultation promised after the conclusion of the Spending Review. The new formula used to allocate the Children's Services Prevention Grant for 2025/26 will be based on the same cost drivers. There is no information about the adult social care formula, nor any commitment on when this will be available. The main cost driver behind the Foundation Formulas will be population, but with a likely added emphasis on deprivation.
- 6.34 In summary, there is little or no detail provided on the needs formulas themselves and no numbers to understand the potential impact on Brent.

Taking account of differences in the cost of delivering services

- 6.35 The needs allocations are adjusted to take account of the relative cost of delivering services in different local authorities: upwards in high cost areas, downwards in low cost areas. This is well-precedented in previous settlement funding reviews.
- 6.36 Once again, the government proposes to implement the broad approach developed by the previous government. This was a more sophisticated, more

granular approach which takes account of the cost of premises and labour in each authority and will be tailored to each service area. It also aims to take account, in particular, of extra costs in rural and urban areas, arising from extended travel times as a result of longer distances or traffic congestion.

Resources equalisation

- 6.37 Resources equalisation is the way in which allocations are adjusted to take account of the different levels of resources potentially available locally to fund services. This is a major factor in the review's outcome: local authorities better able to raise resources locally receive a larger reduction to their allocations, while those with less ability receive a smaller reduction.
- 6.38 The consultation invites views on the degree of equalisation (the percentage equalisation or assumed council tax level). Council tax referendum principles are to be maintained in the future.

Transition to the new approach and keeping allocations up to date

- 6.39 Transition arrangements are proposed to take account of the impact of reform as a whole, including the growth reset. One proposed approach to transition is a phased or 'blended' model. Future years' settlement allocations would be determined by a proportion based on the existing approach to allocations and a proportion based on the reformed approach.
- 6.40 Finally, the consultation invites comments on how to keep the formula up-to-date, by incorporating new data or even forward projections for future years.
- 6.41 Separate from the system changes described above, the government proposes to explore proposals to devolve responsibility for setting levels for some statutory fees and charges to local government. This will have an impact in circumstances where central government has not acted to update statutory fees to cover the cost of providing services. Changes would allow more discretion to tailor sales, fees and charges to specific local circumstances, while protecting vulnerable individuals or those on lower incomes.
- 6.42 Overall, it is welcome that the local government funding system is being reformed, with multi year financial settlements. Funding pressures and a lack of reform over recent years have weakened the financial sustainability of councils and left them with a complex, outdated funding system in need of wholesale reform. Councils need a significant and sustained increase in overall funding to meet the requirements being placed on them but this alone will not address the multiple issues with the current funding system. Creating an improved and a more sustainable system for local government has the potential to strengthen the value for money of local spending and, most importantly, improve services for communities. However, at this stage, the lack of detail setting out the impact on the sector as a whole and on individual authorities make it difficult to meaningfully comment on the proposals.

Departmental Pressures

- 6.43 Managing ongoing demand-led pressures remains a key aspect of the Medium Term Financial Strategy (MTFS). The existing annual growth assumptions are in fact estimated increases in unavoidable expenditure. Those built into the MTFS cover areas such as contract inflation, pay inflation and demographics (by which is meant meeting the cost of providing existing services for a growing and changing population). These expenditure assumptions represent the annual costs that have to be incurred just to stand still.
- 6.44 As the two areas most affected by the changes in demography and increasing contractual costs, the Service Reform and Strategy and Children, Young People and Community Development departments undertook scenario and sensitivity analysis of the effects of different levels of inflation and demographic change. This determined a central case (that is a position between possible best and worst cases), which has been used as the basis of the contract inflation and demographic changes in these areas.
- 6.45 There are also considerable pressures in other areas. The unprecedented demand for temporary accommodation is putting considerable pressure on the budget for Residents and Housing Services. The rise in interest rates since the inflation crisis began in 2021 has led to a significant increase in the cost of borrowing required for the Capital Programme. Concessionary fares are also experiencing substantial increases as usage in London returns to pre-pandemic levels. As the largest contributor to the Freedom Pass scheme, Brent faces a substantial increase in cost with the contribution forecast to rise by £3m in 2025/26. Concessionary fares are part of the Service Reform and Strategy budget.
- 6.46 A summary of these growth and cost pressures are shown in the Table 5.

Table 5: Growth / Cost Pressures

GROWTH	
	2025/26
Categories	£m
Demographics – Adult Social Care	7.3
Demographics - Children’s Social Care	3.0
Demographics - Other	1.0
	11.3
Inflation – Adult Social Care	4.9
Inflation – Children’s Social Care	1.5
Inflation – Other	2.0
	8.4
Temporary Accommodation	11.6
Capital Programme Financing	10.6
Service Changes - Other	10.1
Grand Total	52.0

6.47 The Service Changes heading includes unavoidable changes resulting from new burdens, increases in ringfenced grants and externally driven changes to service levels, for example concessionary fares.

6.48 As with the previous year, directorates will be required to control expenditure within their areas, without seeking additional growth from central budgets when risks or issues emerge that are not already recognised within the Medium Term Financial Strategy. Therefore, it is paramount to ensure that all directorates have adequate plans in place for any expected pressures and significant risks.

6.49 The following sections set out the pressures, mitigations and risks expected in 2025/26, as well as medium to long term pressures and mitigations, for each service area.

Summary of Service Area Pressures

Residents and Housing Services

Homelessness

6.50 Housing Needs and Support continues to be the most significant area of risk and pressure for the Residents and Housing Services department. It is forecast to result in a £15.2m budgetary pressure in 2024/25. An extremely high level of demand for housing services and emergency accommodation is a national issue that is particularly acute in London. The Housing Needs Service in Brent has seen a 12% increase in the number of homelessness presentations received in 2023/24 (7,300) compared to 2022/23. The total number of households in temporary accommodation in Brent has increased to 2,054 (by 8%) over the

same period, and the number of families in emergency temporary accommodation has increased by 36%. As at the end of December 2024, the total number of homeless households living in emergency type accommodation had risen to 1,204, with the service placing an average of 30 households every week. This is a 121% rise in comparison to December 2022 that had 545 households in stage 1 temporary accommodation and a 10% increase when compared to September 2024.

- 6.51 In 2025/26, the average number of homeless households living in emergency type accommodation is expected to increase to 1,643, resulting in a circa £10.2m additional cost to the Housing Needs and Support budget. A worsening of the situation in temporary accommodation is estimated to result in 1,726 households in stage 1 accommodation resulting in a £11.2m cost to the budget. A best-case scenario is estimated to result in 1,561 households in stage 1 accommodation, resulting in a £9.1m cost to the 2025/26 budget.
- 6.52 In addition, inflationary pressures arising from an increase in provider costs is expected to result in a £1.4m cost to the 2025/26 budget. This is the central case based on scenario modelling, with the worst case being £1.7m and best case being £0.9m.
- 6.53 In both cases, the central case has been built into the MTFs, which is based on projecting forward the expected increase in homelessness presentations, the additional cost of temporary accommodation, projections on loss of housing benefit subsidy and factoring in the impact of various interventions being put in place to manage demand and costs.
- 6.54 Together with the additional £3.4m of funding through the Homelessness Prevention Grant, this brings the total growth available for Housing to £15m, which is equivalent to the overspends experienced in 2023/24 and forecast for 2024/25. Homeless households placed in temporary accommodation who are entitled to it can claim housing benefit to go towards their housing costs. Local authorities pay the cost of that housing benefit upfront and then are paid back by the Department for Work and Pensions (DWP) through subsidy arrangements. Households receive the full housing benefit they are entitled to, however the amount the council can claim back is limited to 90% of the Local Housing Allowance (LHA) rates from 2011. This means that if the cost of the housing benefit claim is higher than those rates, the local authority loses money. The Council is essentially bridging the gap between rent and the amount the Council is allowed to recover in housing benefit subsidy from the DWP. The resulting subsidy loss is included in the overall Housing Needs and Support forecast. If the cap for how much the local authority can claim back from the DWP were to be removed and brought back in line with Local Housing Rates for the current year, this could partially help alleviate the current pressure by circa £3.8m. In 2025/26 the pressure is expected to be circa £1m.
- 6.55 London Councils conduct analysis and benchmarking of peers that help to gauge the situation across London. The latest analysis showed that Housing pressures are increasing rapidly compared to budgeted levels and that Councils' net deficit on homelessness service spending is projected to be 40% (£167.8m) higher in

2024/25 than it was in 2023/24. Homelessness presentations continue to increase year on year across London, rising by 7.5% when compared to a year earlier and the number of households owed a prevention or relief duty increased by 3.4%. Data from 26 councils showed that the gross total monthly spend on temporary accommodation across London reached £97.6m.

- 6.56 As these issues are London wide, the availability of B&B and Annexe accommodation is severely restricted across the capital, with many Councils being forced to book expensive provision to meet statutory duties. This lack of availability of accommodation is resulting in having to use expensive providers and at times outside of Brent, which also causes significant financial pressures to the families placed there due to additional travel costs for children at schools in Brent.
- 6.57 The supply of settled TA properties, leased from private owners and used to move families out of B&B and Annexe accommodation has also contracted. This is due to fewer new properties being available under Private Sector Leasing (PSL) schemes, as owners not renewing the lease for existing stock when the lease ends and there is less appetite from landlords on any new approaches. London's Private Rented Sector (PRS) is affected by multiple factors driving a reduction in the availability of properties for rent. The demand for housing is continuing to increase while supply is reducing across the whole market. Greater reliance on the PRS to house lower income households and increasingly limited housing benefits are making accommodation less affordable and available. Factors such as taxation, interest rate changes and uncertainties about future regulation are reducing availability at the lower end of the PRS.
- 6.58 The local housing allowance (LHA) sets the maximum amount that can be claimed to cover housing costs, and is meant to ensure that people can access the cheapest 30% of local homes. However, private rents have risen rapidly to their highest recorded levels, which means that the proportion of new private rental properties affordable to people on Universal Credit or Housing Benefits has dropped to just 5% according to London Councils. As a result, low-income households on benefits increasingly cannot afford private sector rents.
- 6.59 From April 2021 to December 2023, 4.3% of London's rental properties were sold without replacement, with more affordable properties having been particularly impacted. London's PRS is shrinking. During 2023, PRS stock across the lower end in London reduced by 3.3% per month as a proportion of available listings, in comparison to 2.6% per month across the rest of the PRS in London. The Office for National Statistics has published its latest private rent and house prices bulletin providing figures for October 2024. To note, in the months to October 2024 average UK private rents increased by 8.7%, this is up from 8.4% in the 12 months to September 2024. Average rents increased to £1,348 (8.8%) in England, with rent inflation highest in London (10.4%) and lowest in Yorkshire and the Humber (5.9%). The average monthly private rent in Brent was £2,115 in November 2024. This was an increase from £1,651 in November 2023, a 28.1% rise. The reduction in the lower end of the PRS results in less availability of more affordable PRS stock, which particularly affects the ability of low-income households to access the PRS, which makes it harder for local authorities to

prevent and relieve homelessness. This contraction and availability of the PRS market for low income households coupled with the limited impact that would be had of removing the cap on subsidy Councils can secure from the DWP show how widespread fundamental changes are needed to address the current homelessness pressure.

- 6.60 The Council has designed a programme of works to focus on containing the projected pressures. Several workstreams covering affordability of Temporary Accommodation and new and alternative supply have been set up. Officers are actively looking to renegotiate prices and identify alternative arrangements that would allow the Council to move some of the most expensive cases with the aim of reducing costs for the Housing Needs service. Officers also continue to carefully consider and assess the needs of homelessness applications. In 2023/24, 49% of approaches were successfully prevented or relieved. At the end of December 2024, the average percentage of approaches that had successfully been prevented or relieved in 24/25 reached 51%.
- 6.61 The Council's wholly owned housing company, i4B, that is set up to acquire, let, and manage a portfolio of affordable, good quality PRS properties, is continuing its street property acquisition programme and had a target to acquire 25 homes in 2024/25. This target has already been exceeded. Properties are let to homeless families at Local Housing Allowance (LHA) levels. This enables the Council to either prevent or discharge its homelessness duty and therefore reduce temporary accommodation costs whilst also ensuring families have a secure and responsible landlord. The rise in LHA rates has enabled i4B to increase its acquisition price caps. As at end of December 2024, 34 properties have been acquired at a cost of £19.1m, including refurbishment costs, and these property sizes range between one to five bed properties, meaning i4B has exceeded its target for the year and is on track to acquire a total of 37 properties in the year. Negotiations are in progress for additional properties in the borough. i4B continues to be self-financing and the current portfolio results in an annual saving in excess of £4m in Temporary Accommodation costs. Whilst building and new acquisitions would not solely resolve the homelessness crisis, the Council is doing everything within its powers and the funding available to source new supply. Any new supply would help to avoid additional housing costs and mitigate the risk of further overspends.

Supported Exempt Accommodation

- 6.62 The supported exempt accommodation properties are another area leading to growing pressures on the Council finances and presents a new budgetary risk for 2024/25. This is due to providers not being constrained by the LHA caps like other landlords and are therefore able to charge a higher rent once they justify that they are providing support. The amount of Housing Benefit subsidy is dependent on the Rent Officer decision from the Valuation Office Agency and is awarded based on the claim related rent. This is a national challenge as there is a need for better regulation around the agreed criteria that a provider should meet to be considered as a Supported Exempt Accommodation provider and further clarity on what constitutes as minimal care would enable a universal approach when considering an individual's support needs. At Brent a detailed

review has taken place within the Adult Social Care and Single Homelessness Team to ensure providers can adequately fulfil the care and support duties required for Supported Exempt Accommodation. The main routes of referrals are coming from the Voluntary Sector from services such as Crisis, Thames Reach and Single Homeless Prevention Service (SHPS). Historically, this has not been a significant budget pressure for the Council. At this stage an overspend of £4.5m is projected, while further analysis is carried out to understand the scale and quality of referrals from external organisations. It is anticipated that a similar pressure will remain in 2025/26, although the continuous work with the supported exempt accommodation providers is likely to alleviate some of this budgetary pressure.

- 6.63 A dedicated working group has been set up within the Council aiming to minimise the opportunities for exploitative landlords to join the Supported Exempt Accommodation market by introducing a clear strategy on the Council's mechanisms to review landlords that enter this market and those already established. Reviews will also be carried out to consider the individual's support care needs and to verify whether the provider is providing the appropriate amount of care.
- 6.64 A consultation is expected to be launched on the implementation of the Supported Exempt Accommodation Act. The Supported Housing (Regulatory Oversight) Act was introduced in 2022 and came into force on 29 August 2023. The Act introduces national standards for support and give local housing authorities power to set up licensing schemes to manage the scale and distribution of supported accommodation and tackle poor quality supported housing. As Government starts consulting on the standards and licensing and more details becomes known, further horizon scanning will continue to ensure the outputs of this work are aligned to the new requirements.

Household Support Fund

- 6.65 The Household Support Fund (HSF) is a key programme of discretionary support designed and administered within Residents and Housing Services but financed by central government. In recent years, it has helped support Brent's most 'vulnerable' households, including funding free school meals provision outside of term time, dispensing welfare benefits and debt advice (for instance, through contracting with organisations such as Citizens Advice, the Credit Union). The Household Support Fund has been extended for 2025/26, the allocations are yet to be announced.

Children, Young People and Community Development

- 6.66 The provisional local government finance settlement announced £250m of national funding into a new Children's Social Care Prevention Grant that will be used to invest in the national rollout of Family Help reforms in 2025/26. This new grant will lay the groundwork for children's social care reform, enabling direct investment in additional prevention activity through transition to Family Help. Brent is set to receive an allocation of £1.3m of the initial £250m and the

government plans to increase this grant to £263m at the final settlement to be announced in February 2025. It is anticipated that this grant will be ringfenced.

6.67 Also announced in the provisional settlement was a Children and Families Grant worth £414.4m (£2.85m for Brent). This grant consolidates several existing DfE Children’s Social Care programmes and will retain its 2024/25 allocations in 2025/26 as set out in Table 6. The expectation is for this grant to support local authorities that are currently spending on preventative services to continue their current level of spend. There will be no increase in the grant allocation for the next financial year.

Table 6: Children and Families Grant allocations 2025/26

Children and Families Grant 2025/26	National (£m)	Brent (£m)
Supporting Families programme	253.50	1.84
Supported Accommodation Reforms	94.50	0.57
Staying Put	33.30	0.22
Virtual School Heads extension for previously Looked After Children (LAC)	7.60	0.03
Leaving Care Allowance uplift	13.40	0.10
Personal Advisor Support for Care Leavers	12.10	0.09
Total	414.40	2.85

6.68 The government has confirmed the continuation of the Family Hubs and Start for Life programme into 2025/26. The objective of the programme is to join up and enhance services delivered through transformed family hubs in local authority areas, ensuring all parents and carers can access the support they need when they need it. Brent’s provisional grant allocation for the programme next year is £1.6m, a £0.2m increase from 2024/25.

6.69 The children’s social care placement costs that relate to support for LAC and Children with Disabilities are projected to rise by 5.5% in 2025/26, driven by demographic changes and inflationary adjustments aligned with agreed rate increases with providers and the September 2024 CPI. In addition to this, the current quarter 3 forecast has presented a £0.9m placements budget pressure due to increased demand. This in-year growth in demand is expected to add an additional pressure of £2m in 2025/26. The anticipated growth to balance the CYP placements budgets for the upcoming year equates to £4.5m and this has been accounted for in the MTFs. The estimated growth requirement represents a central projection based on scenario modelling of the current mix of placement types and numbers. In the worst-case scenario, the cost could reach £9.1m, while the best-case scenario is projected at £3.5m.

6.70 The increase in the Employer’s National Insurance Contribution is presumed to be reflected in contracted services and placement costs. This is expected to create a post Draft Budget financial pressure of approximately £0.6m on the CYP directorate’s budgets for the next year. The directorate will collaborate with suppliers to negotiate and mitigate costs where possible.

Service Reform and Strategy

- 6.71 The budgets for Adult Social Care and Strategic Commissioning in 2025/26 face significant pressures due to the service being primarily demand-driven, with pressures typically stemming from demographic and inflationary factors. The department also relies on agency staff for social work and hard to fill roles such as Occupational Therapists.
- 6.72 Brent is experiencing an aging population, leading to an expected rise in residents aged 65 and over. Longer life expectancies and complex care needs contribute to increased costs. Despite forecasts anticipating growth, there is a risk of demand surpassing predictions, and needs becoming more complex, which could lead to budget pressures. There has been a 7% increase in the number of residents supported in 2024/25. At the same time, the average weekly cost of care for areas such as Supported Living and Residential Dementia have increased by 7% and 8% respectively.
- 6.73 In 2025/26, there is a risk of significant inflationary pressures in 2025/26 following the government's decision to increase the rate of employer National Insurance contributions (NIC) from 13.8% to 15% and reduce the threshold at which employers start paying NI from £9,100 to £5,000. Additionally, the London Living Wage (LLW) is expected to increase by 5.3%.
- 6.74 The adult social care sector in Brent is mainly staffed by care workers paid at the LLW with a significant number of staff employed part-time, which is also part of the Council's commitment to pay staff at LLW. The change in the threshold at which employers start paying NIC, disproportionately increases the cost of employing part-time staff. Independent advice from Care Analytics and the West London Alliance, of which Brent is part of, has indicated that the impact of these changes for adult social care providers could be significantly more than the growth previously assumed in the draft budget.
- 6.75 These changes pose sustainability risks to the adult social care market, with some providers likely to face higher risks of failure as local authority funding, which supports 70%-80% of the market, is under pressure. If the market fails, the implications will likely include reduced access to care and support for people in need, more pressure on the NHS and increased burden on families and unpaid carers.
- 6.76 A number of scenarios have been modelled which indicate that the Adult Social Care demographic and inflationary pressures could range from a best case of £10.4m to a worst case of £22.3m. The MTFs modelling however has taken the central case scenario and the pressure is estimated as £12.2m. The central scenario is based on demographic trends and local factors which influences Brent's approach to inflationary uplifts with providers, such as existing contractual arrangements in place and the state of the market. The optimistic scenario was based on demographic trends and assumed an inflationary uplift of 3.75%. The pessimistic scenario was based on independent advice from Care Analytics and assumed inflationary uplifts ranging from 6%-12%.

- 6.77 Opportunities have been identified which include using technology to pre-empt demand for adult social care and provide preventative insight. Costs will continue to be managed through commissioning approaches, working in partnership with other councils in the West London Alliance to set residential and nursing prices bands/ negotiate prices for the care home Dynamic Purchasing Vehicle on an annual basis. This aims to balance fair and sustainable rates of care through a greater degree of control over current and future increases and help mitigate the risks to the council of exposure to market forces that drive up costs. Brent will also continue to work with other West London boroughs and through wider London networks, sharing information available to commissioning teams and brokers to help manage placement prices sustainably.
- 6.78 Within Adult Social Care there is a national challenge with the recruitment and retention of staff, in particular Qualified Social Workers and Occupational Therapists. This has meant that during 2024/25, 22% of the staffing establishment has been filled by agency staff. There has been management action to convert agency staff to permanent staff and there have been 16 conversions in 2024 so far. Work however is still ongoing to review the agency staff, reducing the number and cost within the department. Without these measures there is a risk of agency staff numbers increasing as well as the associated costs of recruiting agency staff.
- 6.79 The department also manages the Better Care Fund (BCF), a national programme aimed at developing health and social care integration. It is a pooled budget arrangement between health (North West London Integrated Care Board (ICB)) and the Council. The overall approved pooled budget for 2025/26 is yet to be confirmed however the Discharge Fund which was previously a separate grant has now been consolidated with the improved BCF for 2025/26.
- 6.80 The budget in this department also includes the ring-fenced Public Health grant and currently the allocation for 2025/26 is yet to be announced. Most of public health services are commissioned from the NHS and the pay award for 2025/26 is 2.8% which is higher than the September 2024 CPI of 1.7%. Over the years the national Agenda for Change pay awards have significantly outstripped uplifts in the public health grant and it remains a risk that the increase to the grant may be insufficient to fund the expected inflationary pressures.
- 6.81 The Leisure Service is dependent on income generation, and this will need to be maximised in 2025/26 in order to mitigate the rising running costs. The challenges in the service have also been compounded by the impact of the cost-of-living crisis. The increasing indexed unitary charges and rising utility costs have created significant financial pressures at Willesden Sports Centre. The pressures have been mitigated by a smoothing reserve which is depleting. The MTFS includes provision to mitigate the pressures over the next few years as the reserve is expected to diminish considerably in 2025/26. The council is working with leisure providers to ensure the continuity of an affordable service and in the course of the year reviewing the required investment to enable the leisure assets continue to be financially viable in the long term.

Neighbourhoods and Regeneration

Public Realm

- 6.82 In 2023/24, new contracts were introduced for key Public Realm services, such as parking and waste management. The waste management contract, the largest of these, is experiencing pressures as some operations have not performed as anticipated prior to the contract's start.
- 6.83 The key drivers contributing to this issue are the poor quality of communal recycling, which renders it unrecyclable and necessitates disposal as residual waste, and a rise in fly-tipping in recent years. Programmes are in place to address both challenges, aiming to improve services and reduce residual waste volumes. However, these issues continue to pose pressure heading into 2025/26.
- 6.84 Brent is embracing its unique diversity and working to overcome language and cultural barriers, as well as addressing high levels of deprivation and the significant number of Houses in Multiple Occupation (HMOs). The selective licensing conditions can be used to hold landlords to account for poor waste practices, and a process is being developed with the Selective Licensing team to enable better and wider enforcement. These efforts are aimed at fostering better waste management behaviours and enhancing the overall recycling outcomes for the community.
- 6.85 In Q3 of 2023-2024, Brent started collecting paper and card separately, and the communal recycling rounds were separated to go directly to residual waste. The co-mingled recycling suffered in tonnages whilst we were embedding the new recycling service charges. There is still work to do to improve recycling at flats, such as rolling out food waste at these properties to further improve performance. In addition, the waste education team has transferred from Veolia to be part of the Brent service so that resources can be better directed to combat negative behaviours and reduce rates of contamination.
- 6.86 The cost of disposal of residual waste is approximately 2.5 times higher than for recycling waste. In 2023/24 Brent collected approximately 53.6k tonnes of residual waste, and 19.8k tonnes of recycling, therefore, it is a key challenge for the service to ensure that recycling is maximised, and costs can be maintained within budget. For every tonne of material that could be recycled instead of sent as residual waste, it is estimated it would save the Council £88. Therefore if 10% of waste that was disposed of as residual waste, was able to be recycled instead it could reduce costs by over £450k per annum.
- 6.87 At the same time as waste tonnage is increasing, the price per tonne disposal cost has also risen significantly. In 2024/25 it is up 8.5% compared to the previous year, and a 15.7% increase when comparing this year to 2021-22. These costs are largely out of the control of the Council and are a reflection of high levels of inflation in recent years which has led to increasing contract prices for waste disposal.

6.88 Linked to this, is the first year of the new recyclate reprocessing contract, where fluctuations in material volumes, rejection rates, and market prices combine to create pressures for the affordability of the contract. The first year's operation of this contract highlighted some financial pressures, due to some factors not being as anticipated:

- Less tonnage is being collected/processed, and more loads being rejected. There has been a downturn in DMR (Dry Mixed Recycling) tonnage across the country and this is largely down to purchasing habits changing and manufacturers using less packaging. At the same time the total accepted tonnage has been largely impacted by acceptance criteria at the recyclates reprocessing centre, with more materials being rejected at the front end.
- Recyclate material prices not as anticipated. Material prices are difficult to forecast due to significant variations of prices across all materials.

6.89 The 2025/26 budget has allocated growth to cover the expected inflationary increase to the waste contract and increased waste disposal costs through the West London Waste Authority. Other pressures mentioned above are expected to be contained within existing budgets and planned reserve usage in 2025/26.

6.90 Over the coming years there are expected to be changes to national waste policies. The first one of these is the Extended Producer Responsibility for packaging. From 2025, some organisations and businesses will have to pay a fee for the packaging they supply to or import into the UK market.

6.91 The money will go to local authorities such as Brent, who are responsible for waste collection and also to waste disposal authorities such as West London Waste Authority. It will cover net costs of collecting, managing, recycling and disposing of household packaging waste.

6.92 In the first year (April 2025 to March 2026) LAs will receive a basic payment based on publicly available and existing data (including WasteDataFlow information and Office for National Statistics (ONS) data), and data about tonnages, operations and unit costs gathered from a representative sample of LAs across the UK. From the second year (2026/27) the basic payment and any adjustments will be based on data LAs submit to the Scheme Administrator.

6.93 In November 2024, the provisional notice of basic payment for Brent was given at £3.6m. This will be received across 3 payment dates in 2025/26. The funding will be to maximise recycling and drive down packaging waste. This will be done by refining key services to improve participation, reduce contamination and reach locations within the Borough currently underserved.

6.94 The amount awarded is calculated using the LAPCAP model developed by DEFRA, which considers factors like the type and frequency of collections, local population density, deprivation levels, and specific waste management requirements. Payments only cover the packaging portion of household waste and exclude certain items like PET drinks containers (until 2028), business waste, littered waste, and packaging collected with food or garden waste. The calculation includes data on costs, tonnage of materials, income from selling

recyclables, and overheads, ensuring that payments reflect efficient, cost-effective waste management for each authority.

- 6.95 In order to see the benefits within Brent we will have to see an improvement in recycling performance. Without this there is the risk that the funding provided in future years will not be sufficient and create a cost pressure. Further details of the scheme are awaited to understand the full financial implications for Brent.
- 6.96 The Parking and Traffic Enforcement Services contract with NSL (Marston Group) continues to deliver strong results, emphasising collaboration to enhance operational efficiency and customer experience.
- 6.97 Key service improvements for 2024/25 include a new enforcement plan targeting frequent contravention areas and newly established Controlled Parking Zones, reviewed monthly. This has increased deployed hours, improved outputs, and focused efforts on persistent offenders and blue badge misuse, resulting in more vehicle removals. Enhanced Wembley Stadium Event Day enforcement plans have been implemented with additional resources. The fleet now includes eight e-bikes, boosting coverage and response times. Additionally, new CCTV cameras have been introduced to support four new School Street zones and expand three existing ones, with redeployment of cameras to high-need areas maximising effectiveness. CCTV is utilised where it is available and in cases where it will pay for itself.
- 6.98 Over 250,000 Penalty Charge Notices were issued in 2023/24, with an expected increase to around 280,000 in 2024/25. Looking ahead to 2025/26, further efficiencies will include modernising the CCTV enforcement control room, upgrading camera equipment, streamlining Pay and Display machines to cut costs, leveraging technology for operational improvements, and refining enforcement plans. For CCTV maintenance, a new contract was awarded in October 2024 with DSSL (previously with Tyco) £0.8m. PCN income will be used to offset the budget requirement for this.
- 6.99 The Parking contract with NSL is subject to annual inflation adjustments, which account for increases in the London Living Wage (LLW) for staff-related costs and the Consumer Price Index (CPI) for other pricing elements. These adjustments are calculated each April using a multiplier based on LLW or CPI values from February of the preceding year. Additionally, mail costs are adjusted according to Royal Mail delivery rates. A rise in inflation could increase operational costs, however any financial pressures resulting from contract inflation in 2025/26 will be offset by increased revenue.

Inclusive Regeneration & Climate Resilience

- 6.100 Economic challenges have seen the scaling back or cancellation of some major developments. This has created issues for Inclusive Regeneration & Climate Resilience, as it is heavily dependent on commercial planning income and related items, such as income in building control. The impact within Building Control is further exacerbated by changes meaning almost all major project work

is assigned to Local Authorities by the BSR (Building Safety Regulator) which has taken away the department's ability to bid for further work.

- 6.101 Whilst it is hoped that the economy will recover there is uncertainty about when this could reflect in a recovery of planning income. In the short term, an increase in planning fees could help to mitigate some of the impact, and the use of reserves to help. However, the change by the BSR is more difficult to mitigate against.
- 6.102 Beyond Building Control, the directorate is planning to use some of its reserves to maintain service levels in 2025/26. As these reserves start to run out over the next couple of years the directorate will need to continue to identify new sources of funding or reduce the services it offers. This is a particular challenge in the Regeneration service which use one off external funding streams to maintain staffing to help deliver the regeneration and employment strategies within the borough. If further external funding is not secured the level of service provided will need to reduce after 2025/26.

Capital Financing

- 6.103 The Capital Financing budget covers the Council's revenue expenditure related to prudential borrowing used for capital projects. This budget covers interest payments on past loans taken to finance historical capital expenditure, interest payments on new loans required for the capital programme, loan premiums from prematurely refinanced loans, and the Minimum Revenue Provision (MRP) charge, which is the statutory repayment of debt. Additionally, the budget receives interest income expected from the Council's treasury cash balances and loans advanced to third parties.
- 6.104 The Capital Financing Budget is forecast to experience increasing pressure in the coming years due to the significant investment within the Capital Programme. Since the draft budget, gilt yields have experienced significant volatility, with 10 year gilt yields rising from approximately 3.8% to 4.6%. The Council can secure loans at a margin above gilts from the Public Works Loan Board. The current cost of a 30-year maturity PWLB loan is circa 6.2%. This movement alone is forecast to cost an additional £3.6m per annum since the draft budget to cover the cost of financing our proposed capital expenditure plans.
- 6.105 These factors create a challenging environment in which to plan and execute the Council's strategic capital investment objectives. Brent has multiple schemes that rely exclusively on borrowing and these schemes are subject to regular scrutiny to ascertain their continued viability and whether they provide best value with risk mitigation being a principle concern. If a capital scheme is deemed to be no-longer viable the Council may pause the scheme subject to a later review, reduce the scope or remove from the capital programme entirely. Any decision in this regard will be reported to Cabinet.
- 6.106 Over two thirds of the capital programme projects within 2025/26 are dependent on debt financing to fund the in-year capital expenditure. A significant proportion

of these schemes are invest-to-save opportunities where the project will generate revenue streams to contribute to the capital financing costs of the schemes. This helps mitigate the cost of delivering the scheme for the capital financing budget. These outcomes are closely monitored throughout the project and upon completion to ensure these funding sources can be realised.

Overall summary of the budget position

6.107 The main general fund revenue budget for 2025/26 is set out in detail in Appendices A and B. The budget includes £52.0m of growth items and £8.9m of savings.

6.108 The £8.9m of savings is made up of £4.4m agreed by Full Council in February 2024 (Appendix C (i)) and £4.5m of new savings proposals (Appendix C (ii)) recommended for approval in this report.

6.109 The £4.5m of new savings were proposed at the Draft Budget in November 2024. These savings were required in order to close the £16m budget gap for 2025/26, which had been identified in the July 2024 MTFs update to Cabinet. The remainder of the budget gap is covered by the following items:

- £5.0m of additional Council Tax income resulting from changes to Council Tax Support (to be approved by Full Council alongside this report)
- £6.5m of operating efficiencies to be delivered by services in 2025/26

6.110 Provided that the key assumptions set out in this report hold true then expenditure in 2025/26 should be contained within budget. The overall revenue budget for 2025/26 is set out in the Table 7:

Table 7: Net Revenue Budget

REVENUE BUDGET	2025/26
	£m
Service Area Budgets	
Service, Reform and Strategy	177.8
Children, Young People and Community Development	97.3
Neighbourhoods and Regeneration	34.0
Finance and Resources	29.2
Residents and Housing Services	30.4
Total Service Area Budgets	368.7
Central Budgets	61.4
Total Budget Requirement	430.1
Funding	
Revenue Support Grant	(31.5)
Business Rates	(125.1)
Council Tax	(178.4)
Specific Grants	(95.1)
Total Funding	(430.1)

- 6.111 At Quarter 3 the Council was forecasting a net overspend of £17.4m on the General Fund budget, arising mainly from pressures on the homelessness budget in Residents and Housing Services, which has been experiencing high levels of demand since 2023 due to a rise in homelessness and a reduction in the supply of suitable temporary accommodation.
- 6.112 Additionally, new pressures have arisen within the Children and Young People and Community, Health and Wellbeing directorates. These pressures are being partially offset by £8m of in-year savings that have been identified across the Council, which are part of a package of new measures to provide more assurance over the Council's spending decisions in order to contain identified pressures as much as possible.
- 6.113 Significant additional growth for temporary accommodation costs of £11.6m has been built into the 2025/26 budget to recognise that the pressures on the homelessness budget are ongoing and are not likely to reduce in the immediate future. However, together with the additional £3.4m of funding to be received by the service through the Homelessness Prevention Grant and management actions carried out since 2023 to reduce the overspend, it is expected that the revised budget will be sufficient to cover the forecasted expenditure in 2025/26.
- 6.114 The potential impact has been modelled, with the current assumptions being the central case. The best case would be that management action further reduces the overspend in 2024/25 and results in an underspend in 2025/26 that would enable the replenishment of reserves that have been depleted in recent years. This would then provide some protection in future years from requiring additional savings to cover further unexpected increases in costs. However, should the current overspending represent the new norm, additional savings would be required in 2026/27 to fund this.

Adequacy of reserves

- 6.115 Section 25 of Local Government Act 2003 requires the Corporate Director, Finance and Resources to report to Council his view of the adequacy of the reserves and the robustness of the estimates underpinning the budget. To provide context to those assessments, this report provides an overview of macroeconomic context within which the Council operates and medium-term economic outlook (section 4), details of the governance (section 5) and scrutiny (section 7) arrangements, and an assessment of compliance with relevant codes and standards (Section 6.128-6.133).
- 6.116 As part of the implementation of CIPFA's Financial Management Code, the Council reviewed its approach to reserves. It produced a Reserves Strategy set out in Appendix J (i), which defines a formal policy to determining the purposes for which reserves will be held and how the amount of those reserves will be calculated. This is closely aligned with the MTFS.
- 6.117 Whilst reserves are held for a variety of purposes, they can be grouped under two main headings: reserves held for planned and specific purposes and those held to hedge against the unexpected.

- 6.118 Planned reserves are an intrinsic part of the Council's medium and long term financial planning processes, as they enable funds to be carried across years to fund planned expenditure and to smooth demand that may be uneven over time. Within this heading also fall reserves required by statute or the accounting code of practice. The Council's financial plans will determine the nature and level of these reserves.
- 6.119 Contingency reserves provide funds to cover uncertain events that may transpire. This includes holding a working balance to cover bumps in the Council's cash flow. Unlike planned reserves, the level of contingency reserves is subjective and requires professional judgement. Indeed, Section 25 of Local Government Act 2003 places a duty on the Corporate Director, Finance and Resources to report to Council his view of the adequacy of the reserves so that the Council can make an informed decision. To do this, consideration needs to be given to the risks facing the Council, such as failure to deliver savings, overspending due to demand pressures, uncertainty over future funding and potential natural disasters. These need to be considered from the perspective of likelihood and impact. Past experience and comparison with similar local authorities, such as other London boroughs, are a means to assess the level at which reserves need to be held. Also, it would not be prudent to set a level of reserves that would guard against all possible eventualities. Some events, like major natural disasters or a second pandemic, are of such calamitous impact that no local authority could be expected to weather them without assistance from central government. Indeed, this is why the government has the Bellwin scheme to support for such events and why it provided substantial support to alleviate the financial effects of the COVID-19 pandemic.
- 6.120 The Council has taken these factors into account and has decided that, as a principle, 5% of net expenditure should be held as generally usable reserves. This equates to £20.3m for 2025/26. The details of this assessment are explained further in the Reserves Strategy at Appendix J (i). These increases will be built into the MTFS to meet the requirement to maintain balances at this level. It is the opinion of the Corporate Director, Finance and Resources, as required by Section 25 of Local Government Act 2003, that this level of generally usable reserves constitutes the amount that is sufficiently robust to maintain the Council's financial sustainability.
- 6.121 Brent has total reserves of £523m as at 31 March 2024. On the face of it this would appear to be a high figure, but the following analysis shows that in practice the figure for all practical purposes is substantially lower. £406m (78%) of these reserves are for the funding of the Council's capital programme. £32.8m (6%) is legally ring fenced for bodies such as our maintained schools, the Housing Revenue Account and Public Health. £50.7m (10%) of reserves have been earmarked for a specific purpose or future expenditure commitment. This includes reserves managed by departments (for example unspent government grants with ring fenced commitments or funds set aside to meet known, or unknown, expenditure pressures) and reserves used to smooth out expenditure that by its nature will vary considerably from year to year and avoid uncontrollable under and over spends, for example insurance claims, PFI

contracts and redundancy, etc. Finally, 4% is a general reserve, as set out above, which is held as a contingency against unforeseen events (for example unexpected in-year overspends, failure to identify sufficient savings to balance the budget in-year or future funding risks) and to ensure that the Council has sufficient funds available to meet its cash flow requirements.

6.122 Appendix J (ii) sets out the Council's schedule of earmarked reserves, their purpose and a forecast for the use of each reserve. In accordance with the Council's financial regulations and scheme of transfers and virements, this report sets out the use and purpose of these reserves. In addition, should an overspend arise, it is determined that it can be set against the General Fund balance or the service pressures reserve, which are defined as the Council's generally usable reserves for these purposes. Approval of these arrangements is required for compliance with the Council's financial regulations and scheme of transfers and virements. Should the use of reserves become necessary due to overspending which cannot be contained in 2025/26, this will be funded from reserves with the assumption that any ongoing overspending will have to be funded by additional savings in 2026/27.

Robustness of estimates

6.123 Section 25 of the Local Government Act 2003 requires the Section 151 officer to report to Council on the robustness of estimates made for the purposes of the calculations included in the budget.

6.124 This report sets out the key assumptions (Section four) around growth, inflation and the impact of macro conditions highlighted in the context as well as assumptions in income from fees and charges that align with the economic environment, anticipated demand and the impact of pricing. The Council has made various assumptions around grant funding (Section six).

6.125 The Council has used a variety of techniques to ensure that the estimates made in setting the budget are robust. These include revised forecasts of the resources available to the Council, which sets the financial envelope in which the Council has to operate, and identification of areas subject to significant demand and cost pressures. Sensitivity analysis has been used to ascertain the impact of changes to demographics and the level of inflation. A central case scenario has been used, which is the anticipated most likely outcome, to determine any growth requirements in these areas. Departmental bids for growth and corporate provisions for cost pressures, such as the pay award, have been subject to challenge.

6.126 The culmination is the budget gap which will be bridged by savings, which themselves have been subject to challenge by the Corporate Management Team and members. Finally, the impact of the Local Government Finance Settlement has been reviewed to ensure that the estimates made in the budget remain robust and appropriate.

6.127 The budget has been constructed on the basis of the most realistic scenario, however considering the worst case scenarios set out in this report for the most

significant cost drivers (adults and children's social care and temporary accommodation) suggests £17.2m of further growth may be needed. Likewise, if the best case scenario were to pass, £3.2m less growth would be needed than currently assumed. In the event the worst scenario were to transpire during 2025/26, the Council would need to enhance existing spending controls (such as a recruitment freeze and pausing all non essential spend) and direct departments to identify and deliver further in year savings. The need for these interventions will be determined as part of the budget monitoring process, however it is important to acknowledge at this stage of the budget process the inherent risks involved in setting the 2025/26 budget and the actions that will be required if the worst case scenario transpires.

CIPFA Financial Management Code – Financial Resilience Assessment

- 6.128 CIPFA recommends that local authorities undertake a Financial Resilience Assessment (FRA) each year. The FRA builds on the one-year assessments required under section 25 of the Local Government Act 2003 of the robustness of the estimates used in the budget calculations and the adequacy of the proposed levels of financial reserves.
- 6.129 The Financial Management Code states that “Effective governance and financial management is focused on ensuring that the authority is able to operate sustainably in the long term. This means that the authority needs to look beyond the limited time horizons of its funding arrangements and to consider the longer-term financing of its operations and activities”.
- 6.130 The Financial Resilience Assessment considers long-term financial stability. It does so by considering warning signs such as the symptoms of financial stress and reviewing how effectively the authority manages its finances. This includes explicit consideration of capital resources, reserves, savings plans and the use of performance information.
- 6.131 The Council undertook a Financial Resilience Assessment after approval of the 2023/24 budget. That initial assessment found that the Council's finances were in good shape and sustainable over the longer term. There were areas for improvement and the FRA recommended that the Council should focus on longer term planning, given current uncertainties and anticipated problems on the horizon. The Council intends to use the information in this budget report as part of its Financial Resilience Assessment to ensure that the Council benefits from long-term financial sustainability.
- 6.132 The budget presented in this budget report has been constructed on the basis that the estimates and assumptions made are robust and that if approved, this will ensure Brent has a balanced budget for 2025/26. Furthermore, the update in section seven on the Medium Term Financial Strategy provides details of how the Council has looked beyond the immediate budget cycle to determine the likely actions required over the following three years in order to ensure the budget remains balanced over the MTFs period.

6.133 However, the budget will be monitored closely throughout 2025/26, with updates brought to Cabinet on a quarterly basis. In the worst case scenario that the budget cannot be contained within the resources available to fund it, the Council would bring forward additional in year savings to pull the budget back to a balanced position.

Value For Money

6.134 The Council's external auditors, Grant Thornton, are required to report in more detail on whether the Council has put in place proper arrangements to secure Value for Money (VfM) in respect of economy, efficiency and effectiveness in its use of resources. This includes taking properly informed decisions and managing key operational and financial risks so that the Council can deliver its objectives and safeguard public money. This is assessed under the following areas: Financial Sustainability; Governance; and Improving economy, efficiency and effectiveness.

6.135 As is customary, their report is to be presented to Full Council on 27 February to be considered at the same time as setting the 2025/26 budget. The annual report put forward a key recommendation, for the first time, highlighting the use of reserves in 2023/24 and 2024/25 to fund in year overspends arising from the unprecedented pressures in homelessness and temporary accommodation. This has been acknowledged as a key risk to the Council's financial sustainability and resilience. The continued use of reserves to manage these pressures is unsustainable and in order to stabilise the financial position of the council, £16m of new savings have been put forward for delivery in 2025/26, which will provide the growth needed in the housing budget to manage these pressures going forward.

6.136 As has been set out in this report, the Council will need to make difficult choices in the medium term to demonstrate financial resilience and sustainability. As part of the budget development process, the emphasis continues to be on delivering efficiency measures, service and digital transformation, cost reductions and income generation with a view to protecting front line services and Council priorities as much as possible.

7.0 Statutory process of consultation, scrutiny and equalities analyses

Equalities

7.1 The Council has a duty to pay due regard to the need to eliminate unlawful discrimination and advance equality of opportunity and foster good relations between those who have a protected characteristic and those who don't when making decisions. Each of the budget proposals set out in Appendices C (i) and C (ii) have been subject to an initial equality impact assessment (EIA) to assess their potential or likely impact on service users and employees with protected characteristics. Where the EIA process identified a disproportionate impact, the proposals were subject to a full EIA. In addition to individual EIAs, a cumulative (or overall) EIA has been produced to assess and understand the potential cumulative and compounding impact on groups with a protected characteristic

that arise from either changes across a range of services or a group of savings proposals. For the new savings proposed in Appendix C (ii), these EIA reports are set out in Appendices C (iii) and C (iv), alongside the actual proposals. The EIAs for the savings agreed in February 2024 were attached as appendices to the 2024/25 budget report agreed at Full Council. In summary, it has been concluded that all of the proposals are considered reasonable and have shown due regard to the Public Sector Equality Duty.

Scrutiny

- 7.2 A Budget Scrutiny Task Group was convened after Cabinet published the draft budget proposals in November 2024. The task group, made up of members of the two scrutiny committees (Resources & Public Realm and Community Wellbeing) reviewed the proposals, as well as the budget development process, with relevant Lead members, officers and community members. The task group's report and recommendations, attached in full at Appendix D, were agreed by the Resources & Public Realm scrutiny committee on 28 January 2025 as part of the Cabinet's decision making process.

Consultation

- 7.3 The Council recognises consultation as a key part of policy formulation and makes considerable effort to ensure that the views of residents, businesses and other key stakeholders are taken into account. The Council has consulted on the budget options in a variety of ways. Legally, the results of consultation are something that Members must have due regard to in making budget decisions. However, consultation need not legally be the single or even most significant determining factor in choosing between difficult options, although at Brent considerable emphasis is usually placed on the results of consultation.
- 7.4 The Council conducted a broad consultation process between November 2024 and January 2025 where the budget proposals for 2025/26 were presented. This included attendance at all five Brent Connects events and an online consultation on the specific budget proposals.
- 7.5 The detailed budget proposals were published on the Council's website, inviting comments and feedback through the online consultation portal. A number of people accessed the online consultation and provided responses. Appendices L (i) and L (ii) contain further information about the results of consultation and sets out a summary of emerging themes and other key findings.
- 7.6 There are various business forums and associations that the Council regularly engages with that include a wide range of both small and large local businesses. These include West London Business (a non-profit business membership organisation), the Federation of Small Businesses, the Chamber of Commerce, and town centre business associations. The consultation on the budget was published in a newsletter that is sent to a large number of Brent businesses, explaining why the views of local businesses were important and how they could have their say.

- 7.7 The local voluntary sector is closely engaged with Brent's communities and has considerable experience of the impact of the Council's difficult choices against a background of funding reductions. Engagement with the local voluntary sector has therefore been an important part of the consultation process. Invitations to participate in the consultation were sent to all Brent voluntary and community sector organisations. In addition, the consultation was publicised in the CVS Brent newsletter, inviting responses through the online portal.
- 7.8 Overall, the most commented theme was the proposed increase in Council Tax. It is acknowledged that increasing Council Tax will be difficult for some households to manage in the current circumstances and section six of this report sets out the rationale the Council considered as part of its decision making. In summary, the additional income will provide much needed funding to limit the impact of the significant pressures expected in 2025/26, in particular for the provision of social care and homelessness services, as well as preventing the wholesale cuts to the key services the Council provides that many other Councils are having to consider.
- 7.9 One of the main aims of the consultation and communications strategy was to raise awareness of the Council's financial position, inform residents on how the Council spends its budget and ensure residents, businesses and other key stakeholders were fully aware of the opportunities to have their say, by knowing how to respond and when the consultation events were taking place. This was delivered through a variety of communication channels, including publicity on the Council's website, media briefings and use of the Council's Facebook and X, formerly known as Twitter, accounts to disseminate reminders and encourage residents to participate.

8.0 Housing Revenue Account (HRA) Budget

- 8.1 The proposed HRA annual budget for 2025/26 sets out proposed expenditure for housing management services, stock investment, maintenance work and new council housing development programmes, as well as rent and service charge setting proposals for 2025/26.
- 8.2 The HRA budget is set each year in the context of the 30-year business plan (included in Appendix O). The business plan is reviewed annually allowing for horizon scanning and the identification and mitigation of risks in the short, medium and long term. Early identification of risks enables planning and implementation of mitigations to ensure the HRA can continue to remain financially secure and deliver on its priorities to provide a safe, suitable and secure place to call home.
- 8.3 After four consecutive years of rent reductions, between 2016/17 to 2019/20, the Government set out its rent policy, which originally allowed rent levels to be increased by CPI plus 1% for the next five years starting from April 2020. However, in light of exceptional inflation levels, government amended its rent setting policy for 2023/24 to introduce a 7% rent rise limitation, compared to 11.1% if CPI plus 1% was applied. This was estimated to equate to a circa £2m reduction in income in that year. Furthermore, rent increases in 2023/24 did not

only affect that financial year, but also have an impact on future rent levels. There is no provision in the current rent regulations to allow anything more than the maximum (CPI+1%) increases in future years. Therefore, a lower rent increase in 2023/24 meant that the base for a rent increase in 2024/25 is also lower and so on for future years. For 2025/26, rents are being increased by CPI plus 1%, which equates to a 2.7% rent uplift.

8.4 Table 8 shows a snapshot of current average rent levels from occupied properties and the proposed increase of 2.7% for 2025/26. All new re-lets are charged at Formula Rent and new builds are charged at Formula or Affordable Rent that are in line with Greater London Authority (GLA) benchmarks and are adjusted annually in line with rent standards. Updated rent levels are reflected in the current average rent for 2024/25, average rent can change depending on the time of reporting. The average proposed rent rate for 2025/26 is £3.93 per week (2.7%) higher than the current financial year.

Tenant Rents for 2025/26

Table 8: Average rent levels

Bed Size	Current average rent 2024/25	Proposed average rent 2025/26 (2.7%)	Rent uplift
	£	£	£
Bedsits	106.31	109.18	2.87
1	127.65	131.09	3.44
2	148.31	152.31	4.00
3	160.74	165.08	4.34
4	176.21	180.97	4.76
5	188.69	193.78	5.09
6	196.00	201.29	5.29
7	242.18	248.72	6.54
Average rent	145.51	149.44	3.93

8.5 A rent increase of 2.7% is estimated to result in additional £1.6m of income when compared to current levels of income. This is due to national inflation increasing by 1.7% compared to last year, which is a reflection of the current economic climate.

8.6 For tenants in receipt of housing support to help pay their rent, the cost of rent increase will be met by their housing benefit or the housing element of universal credit, unless the level of support is reduced by factors that may apply to individual circumstances such as the benefit cap. Brent Housing Management provide support to tenants who are struggling to pay their rent. The primary objective is to ensure that tenants have all the support that they are entitled to, rather than pursuing an eviction. Support options include assessing whether the tenant is claiming all the welfare benefits that they are entitled to, assisting them

to claim from the Council's Resident Support Fund and arranging a suitable payment plan. Brent Housing Management endeavour to identify vulnerable tenants and maintain contact with tenants to ensure that they continue to get the required support to sustain their tenancy.

- 8.7 The net rent amounts exclude service charges. Service charges are recharged to tenants and leaseholders, which are based on the actual costs incurred for providing specific services, such as estate cleaning.

Tenants Service Charges 2025/26

- 8.8 Individual service charge elements are adjusted to bring them in line with the estimated contract costs of providing these services to tenants in 2025/26. The tables below show a snapshot of the current average service charges for occupied properties, compared to proposed rates, this is analysed below for services provided to tenants. The current average can change depending on the time of reporting, to reflect re-lets and stock movements such as new additions and right to buy sales. With the recent changes to right to buy which has led to a significant increase in right to buy applications, tenant service charges income could potentially reduce in future due to the reduction in properties available to tenants, however there would be a compensating effect from service charges to leaseholders due to the transfer of the stock.

Service charges frozen for 2025/26

- 8.9 The cost of servicing for the laundry room is forecast in line with service charges. Therefore, no increases are proposed for this charge for 2025/26.

Table 9: Service Charges frozen for 2025/26

Service	No. of Properties	Current Average Charge 2024/25	Estimated Average Charge 2025/26	Increase / (Decrease)
		(£/Week)	(£/Week)	%
Laundry	25	2.59	2.59	0.00%

Service charge increases for 2025/26

- 8.10 The estate cleaning service was in-sourced in 2019/20, with a commitment to pay staff at the London Living Wage before being integrated into Local Government pay scales. The cost of bringing the service in-house and the associated costs for pay inflations, vehicles, machinery and material is estimated to be under recovered by £0.2m in 2024/25. A phased approach to cost recovery was modelled in previous years to allow service charges to increase over a four-year period. The proposed increase of £1.15 per week in 2025/26 will result in break-even position in 2025/26.

- 8.11 The concierge service contract for the blocks in South Kilburn was ended in June 2024 and there are no plans to provide this service again in the near future. Hence the service charge contribution from tenants for this service has been

removed from the 2025-26 budget and likewise the expenditure. New build Council housing blocks that consist of concierge service will receive service charges based on estimated cost and adjusted in following years in line with actual cost incurred. There are currently 92 additional new build properties receiving concierge services in Assembly and Braunston House. Proposed service charges on this block are estimated at £13.58 per week.

8.12 The helpline monitoring service charge is currently £2.08 per week on average. An increase of £0.06 per week is estimated to result in a break-even position for 2025/26.

8.13 Unmetered communal lighting, heating and hot water charges are adjusted annually in line with cost incurred and forecasted energy supplier inflations, reflecting price fluctuations of energy as closely as possible. In the past year, energy prices have reduced significantly compared to the unprecedented volatility experienced in the last two years. The 27% decrease in Communal lighting and the 50% decrease in Communal Heating reflects the anticipated decrease in electric and gas prices from our energy partners in 2025/26.

8.14 The communal TV aerial repairs and maintenance service charge is currently £0.80 per week on average. An increase of £0.02 per week is estimated to result in a break-even position for 2025/26.

8.15 Grounds maintenance service is included within the Council's wider corporate contract. The annual contribution from the HRA is estimated to offset against the HRA's proportion of the contract cost through existing charges. The average cost of grounds maintenance is currently £1.32 per week, which is proposed to increase to £1.53 for 2025/26 in order to achieve a balanced position.

Table 10: Service Charges for 2025/26

Service	No. of Properties	Current Average Charge 2024/25	Estimated Average Charge 2025/26	Increase / (Decrease)
		(£/Week)	(£/Week)	%
Estate Caretaking	4,575	9.18	10.33	12.50%
Helpline Monitoring	14	2.08	2.14	2.88%
Communal Lighting	5,430	4.87	3.56	(26.90%)
Communal Heating	388	44.88	22.44	(50.00%)
TV Aerial	3,171	0.80	0.82	2.50%
Grounds Maintenance	5,157	1.32	1.53	15.91%

District Heat Network

8.16 Unity Place in South Kilburn hosts the energy centre for the local district heat network for metered billing. It currently supplies heat and hot water to 235 properties and tenants are billed based on actual usage. The fuel contract has been renewed from 1 October 2024 to a two-year variable rate until 30

September 2026. Based on the projected fuel contract rates in the current energy market, heat tariff for 2025/26 is estimated to be a variable element of £0.07 p/kWh and a standing charge of £0.50 per day, in order to recover costs.

Table 11: District Heat Network

Service	No. of Properties	Current Charge per kWh 2024/25	Estimated Charge per kWh 2025/26	Increase / (Decrease)
		(£p/kWh)	(£p/kWh)	%
Heating Tariff	235	0.10	0.07	(30.00%)
Standing Charge	235	0.45	0.50	11.11%

Brent Supported Living

8.17 There are currently 28 Extra Care and Supported living properties. These homes are all one-bedroom, self-contained residential flats developed as part of previous New Accommodation for Independent Living (NAIL) programme and are managed within the HRA. The properties are fully adapted, and the homes benefit from communal facilities, including a garden area. There is access to 24-hour care, allowing residents to contact care staff from anywhere in the building.

8.18 Table 12 compares the current gross rent levels (including service charges) for these homes against the proposed increase of 2.7% for 2025/26. This equates to an increase of £9.66 per week when compared to the current financial year.

Table 12: Gross Rents for Brent Supported Living

Current Gross Rent 2024/25	Proposed Gross Rent 2025/26 (2.7%)	Proposed vs Current Rent
(£/Week)	(£/Week)	(£/Week)
357.79	367.45	9.66

Garage Rent for 2025/26

8.19 HRA currently has 212 occupied garages with an estimated annual income of £0.25m for 2024/25. Cabinet approved a standard rate of pricing during budget setting in 2021/22.

8.20 Table 13 shows the current standard rate and the proposed uplift of CPI+1 (2.7%) for garage rents.

Table 13: Garage Rents

Garage Charge (net)	Current Standard Rate (2024/25)	Proposed Standard Rate (2025/26) (+2.7%)
	(£/Week)	(£/Week)
LBB Tenants & Leaseholder	18.68	19.19
LBB Resident	24.91	25.58
Non - Resident	31.14	31.99

HRA Budget 2025/26

8.21 The proposed budget for 2025/26 is set out in Table 14 and shows a net balanced budget. The budget movements are as a result of the items summarised below.

Table 14: HRA budget 2025/26

Technical Adjustments	£m
Gross tenant rent uplift	(2.6)
Leaseholder service charge uplift to reflect cost incurred	(1.6)
Increase in service charges for major works in line with profiled works	(0.1)
Growth	
Pay grade linked increment	0.2
Pay and operational cost inflation on previous year	0.9
Leaseholder insurance contract inflation	0.6
Estate caretaking services cost inflation	0.1
Not renewing contracts	(0.4)
Bad debt provision	0.1
Increase in depreciation costs	0.7
Increase in interest costs	2.8
Saving Target	
Restructures to achieve savings on staffing costs	(0.7)
Total Net Movement	0.0

8.22 The proposed 2025/26 HRA budget summarised in Table 15 ensures a break-even balance at year end. The opening reserve balance is currently £2.4m, which represents 4% of gross rent.

Table 15: HRA Budget 2024/25 v Draft Budgets for 2025/26

HRA Budget 2024/25 v Draft Budgets 2025/26	(1) Budgets 2024/25	(2) Draft Budgets 2025/26	(2-1) Variance	Variance Explanation (2-1)
Description	£'000	£'000	£'000	
Rents and Service Charge	(61.6)	(64.1)	(2.5)	Tenant rents and service charges offset by rent loss through voids and RTB sales
Non-Dwelling Rents	(0.2)	(0.3)	(0.1)	Garage rents
Leaseholders' Charge for Services and Facilities	(3.1)	(4.7)	(1.6)	Uplift to reflect increased cost of rechargeable services
Major Works and Other Contribution Towards Expenditure	(1.0)	(1.1)	(0.1)	Service charge reduction based on profiled major works completion
Total Income	(65.9)	(70.2)	(4.3)	
Repairs and Maintenance	18.0	18.9	0.9	Repairs contract uplifts, repairs delivery model and provision for disrepairs offset by efficiency saving target on voids
Supervision and Management	12.7	12.2	(0.5)	Operational cost inflations offset by savings in management and support services
Special Services	7.3	7.0	(0.3)	Estate service maintenance cost inflation and reduction due to savings on service
Rent and Rates and Other Charges	1.9	2.5	0.6	Council tax and insurance contract inflation
Depreciation of Fixed Assets	15.5	16.2	0.7	Increase in depreciation costs
Bad or Doubtful Debts	1.3	1.4	0.1	Provision for non-payments

Capital Financing and Debt Management	9.2	12.0	2.8	Increase in interest costs
Total Expenditure	65.9	70.2	4.3	
(Surplus)/or Deficit for the Year on HRA	0.0	0.0	0.0	
Housing Revenue Account brought forward	(2.4)	(2.4)	0.0	
(Surplus)/or Deficit on HRA	0.0	0.0	0.0	
Closing balance	(2.4)	(2.4)	0.0	

HRA Stock Improvement and Major Works Budget 2024/25 and 2025/26

- 8.23 The Council Housing Asset Management Strategy (AMS) 2022-2026 sets out a vision for responsive repairs, investment, reform and improvement of the stock and its performance. The AMS consists of a 5-year budget requirement totalling £80.8m and has outlined requirements to increase investment in tower blocks over the next two years. The overall major works programme budget has been set at £26m for 2024/25 and £33.4m for 2025/26.
- 8.24 Tower block funding profile for debt repayment and interest involves mitigating cost reduction of £0.7m in revenue budget to be achieved between 2023 to 2025. Saving targets have been identified in void repairs, disrepair works and staff vacancies. In addition to revenue savings, cost reductions to long-term capital programme have been profiled totalling £33.5m between 2026 to 2048. Budget projections for planned works over this period is £13.5m per annum on average and is estimated to be sufficient by Housing Property Services to enable statutory maintenance works to Council properties to be undertaken.

New Council Homes Programme 2025/26

- 8.25 The development and management of new council homes and affordable housing remains a key priority in the Council's Housing Strategy and the HRA Asset Management Strategy. The Council has an ongoing commitment to deliver 5,000 affordable homes in the borough of which 1,957 will be delivered directly by the Council by 31 March 2028. As of December 2024, 879 new homes have been delivered by Council. The forecast capital investment on acquisitions and building new Council homes in 2024/25 is £19.3m, with a capital budget in 2025/26 set at £15.5m.
- 8.26 The Alperton Bus garage development which will deliver 155 social rented homes is set to complete during 2025/26. To finance the purchase, the Council has taken a 50 year lease with annual lease payments set at a proportion of current social rent levels and indexed at CPI + 1% annually. After the 50 year

lease ends, a reversionary 949 year lease will be granted at a nominal rate. The Council has established a reserve within the financing structure to address the ongoing repayments required under the lease. This reserve is particularly important in mitigating potential risks, particularly in scenarios where social rent policies may deviate from the current CPI + 1% increase.

Housing General Fund

Temporary Accommodation

8.27 In 2021 two purpose-built developments in Harlesden, Anansi House (92 Units), for families, and Knowles House (57 Units), for single people, became available. These properties were developed specifically to meet the statutory duty to secure suitable interim accommodation for homeless households and replace the use of privately owned Bed & Breakfasts and Annexes.

8.28 The proposal is to hold rents capped at Local Housing Allowance (LHA) levels. LHA rates for 2025/26 will be frozen at the 2024/25 levels, following their increase in April 2024. Based on the LHA rate for April 2024, this will result in the uplift in rents for 2025/26 shown in Table 16:

Table 16: Temporary Accommodation rents

Bed Size	Number of Units	Current average rent 2024/25	Proposed average rent 2025/26 (Based on current LHA rate)	Rent uplift
Bedsits	57	295.49	331.39	35.90
1	69	295.49	331.39	35.90
2	23	365.92	412.86	46.94
Average Rent		330.71	372.12	41.41

8.29 In 2024/25 it was proposed to add additional charges to meet all outgoings applying to the Premises including both communal and personal utility water charges, heating charges and Wi-Fi charges. In 2025/26, a 36% increase to Utilities and a 294% increase to Water is proposed to meet the outgoing costs. Total forecasted cost incurred for utilities is estimated to be under recovered by £45k, and £159k for Water in 2024/25. Table 17 shows the uplifts that are proposed for 2025/26 to meet the outgoing costs:

Table 17: Temporary Accommodation utilities, water and wi-fi charges

Service	No. of Units	Current Weekly Charge for 2024/25	Estimated Weekly Charge for 2025/26	Increase / (Decrease)
				%
Utility	149	£10.50	£14.26	36%
Water	149	£7.00	£27.56	294%
Wi-Fi	149	£3.00	£3.48	16%

8.30 Once the main housing duty is accepted, a further charge for council tax is proposed. There are 126 units that are band C properties, which has a proposed Council Tax charge of £1,460.24 for 2025/26. There are 23 units that are band D properties, which has a proposed Council Tax charge of £1,642.77 for 2025/26. The GLA precept is not confirmed at this stage and is subject to their own decision making and consultation process. However, including the proposed GLA precept, these figures are £1,896.13 for Band C and £2,133.15 for Band D. In addition, once the main housing duty is accepted tenants will be expected to meet all outgoings applying to the Premises including water charges and electric and other costs whether metered or billed, directly, in line with the licensee's obligations.

Hillside Rent Setting

8.31 In addition to the dwellings contained within the HRA, the Council also continues to hold dwellings in the General Fund (GF). These dwellings were formerly held by the Stonebridge Housing Action Trust (HAT) and were transferred to Brent Council in August 2007 when the HAT was dissolved. The Council currently owns 324 properties under this scheme and Hillside Housing Trust (part of Hyde Housing Group) manages these properties on the Council's behalf.

8.32 Table 18 sets out the rent levels for 2024/25, with an average increase of £3.92 per week for 2025/26.

Table 18: Average Rent Increase for Hillside

	Weekly Rent 2024/25 (£)	Weekly Rent 2025/26 (£)	Increase (£)	Increase (%)
1 Bed Flat	£119.43	£122.65	£3.22	2.7%
2 Bed Flat	£139.89	£143.67	£3.78	2.7%
1 S/croft Elders	£119.34	£122.56	£3.22	2.7%
2 S/croft Elders	£139.89	£143.67	£3.78	2.7%
2 Bed House	£151.95	£156.05	£4.10	2.7%
3 Bed House	£168.18	£172.72	£4.54	2.7%
4+ Bed House	£177.04	£181.82	£4.78	2.7%

8.33 Hillside are also responsible for setting service charges across the stock, including those retained by the Council. The average service charge per week for 2025/26 has been recommended by Hyde. It will cover the contracted costs of Hyde in providing the services.

Housing Private Finance Initiative (PFI)

8.34 The Non-HRA Housing PFI refers to 364 units of rented accommodation managed by Hyde under a PFI contract. The stock is made up of a mixture of Temporary Accommodation, Discounted Market Rents and Affordable Rent properties, which are up to the lower of 80% of market rates or the Local Housing Allowance (LHA). As per the cabinet decision on the 17 January 2017 in regard to PFI Housing Tenancy Conversions, Temporary Accommodation units are being phased out with the units being converted into Affordable Rent and Discounted Market Rent properties.

8.35 The proposal is to move towards Local Housing Allowance (LHA) alignment for relevant rents by the end of the contract in December 2028. Discussions with Hyde are still ongoing. LHA rates for 2025/26 will remain frozen at the current levels. This is after an increase in 2024/25 where the rates were raised to the 30th percentile of local market rents from April 2024 after being frozen since April 2020.

Travellers' Site Pitch Rent

8.36 The current weekly pitch rent is £180.26. It is proposed to increase this by 2.7% to £185.13 for 2025/26. Travellers' site pitch rent is estimated to generate an annual income of £0.28m.

9.0 Schools and Dedicated Schools Grant (DSG)

- 9.1 The autumn statement announced an additional £2.3bn will go into core schools budgets next year. £1.3bn will go towards the pre-16 mainstream schools' budgets and £1bn for SEND and alternative provision funding to improve outcomes and return the system to financial sustainability. The government plans to work with the wider sector, including local authorities to progress this work.
- 9.2 Mainstream schools are in receipt of additional grants to the DSG in the current 2024/25 financial year, including the teachers' pay additional grant (TPAG), teachers' pension employer contribution grant (TPECG) and the core schools budget grant (CSBG). From 2025/26, funding previously distributed through these grants will be allocated through the Schools Block and the Central Schools' Services Block (CSSB) by adding these grants to the baseline and increasing the minimum per pupil funding.
- 9.3 Table 19 sets out the changes to the National Funding Formula (NFF) for Brent in 2025/26, including the impact of the grants that have now been rolled into baselines.

Table 19: Brent NFF Allocation 2025/26

Brent NFF Allocation 2025/26	Schools Block	High Needs Block	CSSB	Early Years Block	Total
	£'000	£'000	£'000	£'000	£'000
2024/25	274,404	85,007	2,125	34,350	395,886
2025/26	298,181	90,325	2,445	41,442	432,394
Increase	23,777	5,318	320	7,092	36,508
% Change	8.7%	6.3%	15.1%	20.6%	9.2%
*Other grants included in 2025/26 allocations (TPAG, TPECG, CSBG)	19,223		396		19,619
Increase/(decrease) excluding other grants	4,554	5,318	(75)	7,092	16,889
% Change excluding other grants	1.7%	6.3%	-3.5%	20.6%	4.3%

- 9.4 Brent will receive an increase in mainstream pupil funding of £23.8m of which £19.2m relates to funding previously allocated to schools as separate grants. This represents a 1.7% (4.8% in 2024/25) comparable increase exclusive of other grants.
- 9.5 As in previous years, the Council will continue to set a local funding formula for mainstream schools in 2025/26, although the total funding available to schools will be determined by the NFF and as required, the Council will need to move

closer towards the NFF factors in line with the government's plans for local authorities to move towards the compulsory direct NFF.

9.6 Key features of the 2025 to 2026 schools NFF include:

- An increase in factor values in the NFF to increase the amount of funding available to schools. Through the minimum per pupil funding levels, every primary school will attract at least £4,955 per pupil, and every secondary school at least £6,465 per pupil.
- The funding floor will continue to protect schools from sudden drops in their per-pupil funding.
- Rolling the 2024/25 TPAG, TPECG and CSBG into the schools NFF, ensuring that this additional funding forms an on-going part of schools' core budgets.

9.7 The High Needs block (HNB) of the DSG will see a 6.3% (£5.3m) increase in 2025/26, partly due to increased commissioned places in special schools and academies from September 2025. This additional funding level is welcomed, given the current deficit management plan includes an assumption of a 3% increase in the HNB funding for next financial year. This additional funding will go towards setting a balanced budget to mitigate the projected 6% growth in EHCPs.

9.8 The government plans to continue the expanded roll out of funded childcare hours for parents of children from 9-months-old, up to 3- and 4-year-olds. Brent's allocation of the Early Years' grant for 2025/26 is £41.4m and this represents an increase of £7.1m (21%) compared to the last financial year, with the most significant changes reflected against the 2-year-old working parents' entitlement which will increase by £1.9m ((58%) and under 2-year-old working parent entitlement set to increase by £4.2m (128%) based on the expansion of hours to 30-hours from September 2025. Brent's rates for the new financial year will rise to £13.32 for under 2s, £9.77 for two-year-olds and £6.80 for 3-and 4-year-olds. Funding for Brent's Maintained Nursery Supplementary grant is set to increase by 13% to £1m at a rate of £7.08 per hour.

9.9 The CSSB will increase nationally by an average of 1.85% for ongoing responsibilities that local authorities continue to have for all schools, while those local authorities in receipt of funding for historic commitments within this block will see a 20% decrease compared to 2024/25 allocations. The overall impact for Brent is a 20% increase in the per pupil rate of funding for ongoing responsibilities, and a 20% reduction against the historic commitment which currently relates to a pensions strain contribution to the Council's central budgets. As a result, the amount to be transferred to the centralised budgets towards this pension cost will be reduced accordingly.

9.10 In 2025/26, funding for the CSSB will incorporate allocations that were provided separately in 2024/25 for increased copyright license costs, TPECG, and CSBG for centrally employed teachers. Excluding these grants, which are now part of the 2025/26 baseline, the allocation reflects a 1% reduction in funding for ongoing responsibilities compared to 2024/25.

- 9.11 The government has announced an additional £1.4bn towards the continuation of the School Rebuilding Programme with a further £2.1bn being allocated to maintain and improve school buildings. The school Rebuilding Programme is transforming over 500 schools in the most need of renovation nationally and three of Brent's schools are included in this programme which will continue into 2025/26.
- 9.12 Brent Schools had the option to bid directly to the Department for Education (DfE) for up to £0.150m of the school-based capital grant to expand their existing nurseries or open a new one by September 2025, as part of the government's drive to deliver more school-based nurseries. Applications closed on 19 December 2024 and the Early Years' team within the CYP directorate has been working with schools to encourage take up of this offer from the government. The DfE has confirmed that six primary schools have been selected as early adopters of the universal breakfast club provisions in Brent.
- 9.13 The government acknowledges the increasing financial pressures that rising costs of SEND (Special Educational Needs and Disabilities) provision are placing on local authorities, particularly due to the impact of DSG deficits. The government has stated it intends to outline its proposed reforms to the SEND system in greater detail in 2025/26. This will include measures to support local authorities in managing both historical and ongoing deficits, as well as plans for transitioning from the current system to a reformed model. These reforms will guide any decisions regarding the removal of the current statutory override, with the overarching aim of enabling local authorities to deliver high-quality, financially sustainable services for children and young people with SEND.
- 9.14 In the autumn statement, the government pledged to assist schools and colleges with the extra costs linked to the rise in NIC and has stated that the distribution methodology and funding allocations will be announced in spring 2025.

10.0 Capital Programme Budget 2025/26 – 2029/30

- 10.1 Brent's Capital Programme is a key component of the Borough's MTFs, and it is a major part of the budget setting process. The programme is principally concerned with meeting the Council's statutory obligations in relation to housing and schools but also emphasises improvement of town centres, highways, public spaces and other community amenities.
- 10.2 A fundamental part of the Council's successful financial strategy has been the expansion of Brent's capital investment programme over the last six years. The capital investment programme has generated significant revenue savings over the medium-term and the concept of 'invest to save' remains the core ethos and eligibility criteria for new schemes. Further details of the Council's approach to capital investment to support the Council's objectives can be found in the Capital and Non-Treasury Investment Strategies in appendices F & G.
- 10.3 The Council's Capital Programme utilises a wide range of funding sources so as to reduce the need to borrow and manage the Council's cost of debt. These

include capital receipts, grants, S106 and CIL (Section 106 and Community Infrastructure Levy), reserves and contributions from revenue. Affordability continues to be the key factor in the Council's borrowing strategy, especially given the Council's net borrowing position. The use of internal borrowing provides a cost-effective approach of using internal resources to postpone the need for external borrowing and make effective use of the Council's cash resources. The programme encompasses a mix of invest-to-save, grant-funded, and self-financed projects and consequently, our strategy ensures external borrowing as a last resort for funding projects.

- 10.4 The broader economy is facing significant challenges due to the economic volatility in recent years, characterised by high inflation and rising interest rates. Inflationary pressures surrounding costs, particularly in the construction sector, resulting in high volatility, have made it challenging to reliably estimate potential expenditure associated with capital schemes within our development. The capital schemes within the programme undergo regular scrutiny to assess their viability and affordability, with risk-mitigation decisions made as needed. A large portion of the projects are invest-to-save opportunities, designed to generate revenue streams that help offset financing costs, and these are closely monitored throughout the project.
- 10.5 The Council has initiated an ambitious Capital Programme, planning to invest approximately £779.51m over a five-year span, from 2025/26 to 2029/30. This investment covers substantial expenditures in both the General Fund and the Housing Revenue Account (HRA), aligning with the Council's strategic objectives across the borough. In addition, the Council has a Capital pipeline, which currently holds 19 projects with a provisional value of £598.50m. These pipeline projects do not form part of the Capital Programme and no funding has yet to be allocated to these. Further details can be found in Appendix E – Capital Programme Pipeline.
- 10.6 A comprehensive overview of the Capital Programme, categorised by portfolio for the five-year period from 2025/26 to 2029/30, is provided in Table 20 with 2024/25 provided for comparison
- 10.7 The revised budget for the year 2025/26 currently stands at £346.61m. This budget is subject to modifications as new projects receive approval before Full Council in February 2025.

Table 20: Summary of the Capital Programme 2024/25 to 2029/30

Portfolio	Board (Programme)	2024/25 Budget £m	2025/26 Budget £m	2026/27 Budget £m	2027/28 Budget £m	2028/29 Budget £m	2029/30 Budget £m	Total 2025/26 to 2029/30 £m
Resources: Cllr Mili Patel	Corporate Landlord	13.53	9.72	36.13	24.27	3.67	4.50	78.29
Regeneration, Property & Planning: Cllr Muhammed Butt	South Kilburn	33.36	28.02	20.17	16.90	7.55	1.20	73.85
Regeneration, Property & Planning: Cllr Muhammed Butt	Regeneration	45.61	106.55	33.58	23.32	14.12	0.00	177.57
St Raphael's : Cllr Muhammed Butt	St Rapahel's	0.54	3.15	3.85	12.50	0.00	0.00	19.50
Regeneration, Property & Planning: Cllr Krupa Sheth	Public Realm	20.64	10.22	0.29	0.29	0.00	0.00	10.79
Public Health: Cllr Neil Nerva	Public Realm	0.28	0.28	0.32	0.32	0.25	0.25	1.41
Environment: Cllr Krupa Sheth	Public Realm	3.95	7.29	4.05	1.00	5.99	0.00	18.33
Children, Young People and Schools: Cllr Gwen Grahl	CYP & Schools	28.32	16.93	26.63	5.83	5.27	0.00	54.66
Housing, Homelessness & Renters Security: Cllr Muhammed Butt	Housing GF	75.56	114.08	30.77	2.83	0.00	0.00	147.68
Housing, Homelessness & Renters Security: Cllr Muhammed Butt	Housing HRA	54.73	50.38	94.07	27.98	13.94	11.09	197.45
Total		276.51	346.61	249.86	115.22	50.78	17.03	779.51

Housing Programme

10.8 The development and management of housing remain central to the Council's strategy, with significant investment across various programmes to address housing needs and enhance living standards. The Housing Programme is advancing steadily, with key projects now entering pivotal stages of delivery. Projects such as Fulton Road, Church End Regeneration, and Watling Gardens are progressing toward completion, with Fulton Road and Church End expected by 2025/26. Temporary accommodation initiatives, including Edgware Road and LAHF, aim to alleviate housing pressures. Challenges, such as cost pressures in the New Council Homes Programme and delays at Clock Cottages, are being actively managed, with alternative solutions being explored. Overall, the Council demonstrates a strong commitment to improving housing supply, affordability, and quality through its ambitious plans and ongoing investment.

General Fund Housing

10.9 The General Fund is allocated to spend £147.68m over the next five years, starting from 2025/26, on mixed-use developments.

Fulton Road

10.10 The Council has entered into a long-term lease agreement, spanning 999 years. The acquisition of the development at Fulton Road will result in an additional 294 homes, within the Wembley Park ward. This site is focused on meeting the current demand for larger family-sized accommodations, with a priority on delivering 3-bedroom homes, estimated to cost approximately £85.54m. The Fulton Road development is progressing steadily and is expected to complete in 2025/26. It comprises 118 London Living Rent units, which Brent Council will sub-lease to one of its housing companies, and 176 London Affordable Rent units, which will be transferred to the HRA upon completion. Once transferred, these units will be fully financed and maintained within the Housing Revenue Account.

Aids & Adaptations – Private Works

10.11 The Council has secured £9.82m in Disabled Facilities Grant funding, intended to cover the expenses associated with adapting the homes of vulnerable Brent residents. This initiative aims to help individuals maintain their independence and quality of life by supporting home adaptations, allowing them to stay in their homes, reducing the need for more intensive care. In turn, this could help alleviate some of the pressures facing Adult Social Care, which is grappling with increased costs due to Brent's aging population and the growing complexity of care needs.

Church End Regeneration

10.12 The project, currently underway within the main works phase, intends to provide 99 homes for affordable rent, with a projected completion date in 2025/26. £34.07m in capital spending is targeted over the next five years. Church End is

one of the Council's flagship projects and a key priority, aligning with Brent's Local Plan. This Council's objective is to rejuvenate the local centre, stimulate the local economy, and offer new housing, workspace, and other amenities to support the local community.

Clock Cottages

- 10.13 The Clock Cottage contract, awarded in July 2022 with an initial £4.20m allocation, pertained to the retention and part re-use of Clock Cottage, demolition of the single-storey stable buildings, and erection of a new two-storey building. This will provide 13 self-contained units (Use Class 3b) to be used as assisted living accommodation for adults with disabilities.
- 10.14 The project's initial allocation included around 40% in provisional sums. However, a recent site survey revealed the need to demolish internal walls and floors, which was not part of the original contract but became necessary for the project's critical path. As a result, additional funding was needed to complete the work, increasing the total allocation to £6.39 million. This included a request for £0.99 million in additional funds to be financed through prudential borrowing.

i4B Holdings

- 10.15 i4B Holdings is actively involved in acquiring properties throughout the borough and purchasing street properties, which are then offered as affordable rented homes. This initiative aims to alleviate the housing pressures in our community, reduce the financial burden, and decrease the number of families in temporary accommodations. The Council plays a role by acting as a lender, providing the necessary funds to balance the equation. Our involvement includes a combination of equity investment and loans to support i4B's provision of PRS accommodation, which enables the Council to either prevent or discharge its homelessness duty and therefore reduce temporary accommodation costs.
- 10.16 At the beginning of 2024/25, i4B had an opening balance of approximately £21.00m remaining from its loan facility for private rented sector property acquisitions. During the course of the year, the company would aim to purchase 40 units, with forecasted loan drawdowns expected to utilise most of the remaining loan facility, amounting to approximately £20.50m in 2024/25. Looking ahead to 2025/26, i4B will need to establish a new agreement with Brent and develop a plan for future acquisitions.

Temporary Accommodation (TA)

- 10.17 The Edgware Road project is intended to provide 110 affordable homes for temporary accommodation along with five retail units. Following the sign-off on the Pre-Construction Services Agreement (PCSA) on 30th March 2023, in November 2023, a Section 73 application was submitted, requesting an amendment to the initial planning permission to now include three additional stories, a second staircase, and a third lift. These changes address updated fire safety standards and expand the development's capacity. The planned capital expenditure for the next five years is set at £40.52m.

10.18 In October 2024, the Council entered a Memorandum of Understanding (MOU) with the Ministry of Housing, Communities and Local Government (MHCLG) to deliver up to 42 homes under the Local Authority Housing Fund (LAHF) initiative. The plan includes 35 units for temporary accommodation, 5 resettlement units, and 2 large resettlement units for families requiring 4 or more bedrooms, with 25 units scheduled for delivery in 2024-25 and the remaining 17 units in 2025-26. The total allocation for the scheme is £25.80m, of which £10.49m is grant-funded with £15.32m financed through prudential borrowing. The Council is considering the option of acquiring larger properties than originally planned to better address local housing needs. However, this approach presents challenges, as larger properties are typically more expensive and often occupied. To support this initiative, an additional £5.19m in funding has been proposed to accommodate the increased costs associated with acquiring such properties.

Housing (HRA)

10.19 Planned expenditure on housing HRA over the next 5 years from 2024/25 is £197.45m.

New Council Homes Programme (NCHP) - 2021-2026

10.20 The New Council Homes Programme comprises a series of projects in the early stages of development, with a combined value of £71.87m projected for expenditure over the next five years. However, due to rising costs and financial pressure; including construction industry resource constraints, inflation, new Building Safety Regulations for buildings over 18m or seven storeys, and the council's broader financial challenges, a review is underway to assess the viability of these schemes. As a result, £48m of the allocation initially planned for 2025/26 has been deferred to 2026/27 while the review is underway.

Major Repairs & Maintenance of Council Stock

10.21 An overarching objective for the Council has been to meet the government's mandate of ensuring that 100% of social homes adhere to the decent home standard. To accomplish this, the Council has made significant investments in its Housing Revenue Account (HRA) properties, ensuring that they not only meet but also consistently maintain the decent homes standard.

10.22 The Council remains dedicated to investments in repairs, maintenance, and enhancements to extend the lifespan of its assets. The HRA Capital Programme outlines planned expenditures amounting to £104.00m over the upcoming years.

Tower Blocks Programme

10.23 The Council manages several high-rise tower blocks, originally constructed in the 1960s-70s, which are funded through the Housing Revenue Account (HRA). These buildings require substantial refurbishment to extend their lifespan by

40-60 years, focusing on upgrades to external structures, interiors, and aging mechanical and electrical systems. A five-year investment of £39.40m has been allocated for essential works, including statutory compliance, fire safety enhancements, and decarbonisation efforts, with the refurbishments expected to deliver significant annual savings in repair costs.

Watling Gardens

- 10.24 The Watling Gardens project comprises 125 units and is presently under construction, making substantial progress. Over the next five years, total capital expenditure of £22.78m has been allocated to this project. The scheme aims to provide a combination of social housing and shared ownership units. However, due to changes in legislative requirements related to the inclusion of a second staircase, the anticipated completion date has been extended by nine months. We now expect the project to be completed in early 2027/28.

Acquisition at Grand Union Phase 2

- 10.25 The Council has initiated the acquisition of Grand Union Phase 2, a scheme that will deliver 115 affordable units at a total cost of £30.61m. The projected expenditure for this scheme over the next five years amounts to £1.49m. Historically, acquisition schemes have demonstrated strong economic viability for the council.

Corporate Landlord

Retained Estate

- 10.26 £10m is being invested to fund necessary building improvements works across the Council's retained buildings. This investment will enable the Property & Assets Team to replace ageing equipment, upgrade essential building components, and enhance spaces to meet current standards and reduce disruptions. These upgrades will also support the proactive corporate landlord strategy, ensuring that the Council's buildings remain fit for purpose.

Digital Strategy & ICT Investment

- 10.27 £7.4m is to be invested into Digital Strategy (from 2025/26 to 2028/29) with the objective to improve access to online services for both residents and businesses and to make better use of data to understand customers' needs to improve the way services are delivered to residents. The investment will also ensure that staff have the digital skills to effectively use existing and new technology.

Libraries

- 10.28 £0.8m will be invested at Kilburn Library to upgrade the library facilities including the garden and improve the accessibility of the building through improved design and signage. The works will also extend the footprint of the

building to create a dedicated event and learning space for the community. This is due to be completed by the end of March 2026.

Central and North West London College (CNWL) Campus

- 10.29 A loan is to be provided to enable Central and North West London College to acquire and develop a new campus in Wembley Park. The loan would be repaid by way of sale of the college's existing site to a property developer, which would also result in the delivery of much needed housing for the local area. The timing and value of the loan required will depend on updated project proposals from the college.

Public Sector Decarbonisation Scheme – Phase 4 (new)

- 10.30 The Council has submitted a bid to the Public Sector Decarbonisation Scheme Phase 4 programme to support the Council's objectives to reduce carbon emissions from its corporate buildings by implementing energy efficiency and heat decarbonisation measures such as insulation, window glazing, LED lighting, Building Management System upgrades, solar panels on roofs and heat pumps. The outcome of the grant application is expected by May 2025.

Public Realm

Highways Management

- 10.31 Highway infrastructure is the most visible, well used and valuable physical asset owned by the Council. The latest value of Brent's asset is estimated at around £4.5bn and includes 505 km of roads; 847 km of pavements; 20,700 road gullies, and 90 bridges and structures. In the last two years there was significant additional investment to the maintenance budget, consisting of £3.5m base Brent capital funding, £5.33m extra Brent Capital funding and £200k TfL funding. These maintenance works include carriageways and highways, footbridges, main A & B roads, injection patching, drainage, and road condition surveys. In addition to the £3.5m highway maintenance base funding this year, a s106 funded hostile vehicle maintenance programme to prevent illegal vehicle parking concludes in 2025/26.

Environmental Health & Climate Emergency

- 10.32 The Integrated Street Cleansing & Waste Vehicle acquisition programme continues, with £1.4m of the £21m to be spent in 2025/26. The borrowing costs to fund the purchase of the fleet over eight years is to be funded by revenue contributions. The expansion of the Northwick Park Hospital Mortuary (£2.5m) should be delivered this year subject to Barnet Council's and Harrow Council's capital contribution confirmation. This is a tri-borough project, funded equally by neighbouring Harrow and Barnet, with the Brent contribution funded by SCIL. Meanwhile, the first year of the 'Green Corridors' scheme will commence in the Church End and Roundwood Green wards in Willesden (this particular project will cost £3m and is funded by SCIL). The Green Corridors strategy is integral to supporting sustainable growth, addressing the climate and ecological

emergency while contributing to a healthier, greener, and more cohesive community in Brent via a range of traffic management, active travel and inclusive green infrastructure improvements.

Healthy Streets & Parking

- 10.33 TfL are expected to continue to fund a number of ongoing Healthy Streets schemes (£2.5m), including Local Safety, Bus Priority, School Travel Plan, School Streets Development, Cycle Parking Scheme, and Safer & Healthier Travel. There are many risks within the programme due to the lack of certainty regarding TfL funding. Announcements often provide very little notice for planning as well as a lack of certainty on value and Brent having to be more competitive against other London boroughs to win new funding for new schemes. Some of the Healthy Streets schemes have seen tangible successes in traffic reduction, inclusivity and good levels of resident satisfaction. The Beresford Avenue/Mount Pleasant Controlled Parking Zone scheme (£0.8m) is to be funded by s106.

Parks & Landscaping

- 10.34 The major works in this area of the Public Realm budget in 2025-26 are for the sports pitch improvements in Gladstone Park (£0.4m), as well as ongoing playground infrastructure improvements, park maps and information boards, and pathways in parks and green open spaces across the borough. Tree works and landscaping improvements are scheduled for Wealdstone Brook, and Wembley Central Square (£0.2m), both NCIL funded.

Vale Farm Asset Management Programme

- 10.35 The proposed asset management programme has been developed following a building condition report that set out a programme of required works to ensure the equipment and facilities are maintained to a safe and acceptable standard. The programme includes a £1.4m investment over the next 5 years to 2030.

Woodcock Park Flood Alleviation Scheme

- 10.36 The Wealdstone Brook flows through Woodcock Park. The Environment Agency flood map for rivers and seas shows that the properties along the brook downstream of Woodcock Park are at medium and high risk of flooding. The proposed Woodcock Park Flood Alleviation Scheme (£0.5m) is expected to be funded by SCIL.

Active Travel Infrastructure Improvements

- 10.37 Infrastructure Improvements for Active Travel (£0.5m in 2025/26, SCIL funded) is another Public Realm Pipeline Scheme addressing the climate and ecological emergency through the delivery of several Green Neighbourhood pilots (the first phase being Church End & Roundwood; and Kingsbury). Church End and Roundwood have been allocated SCIL funding following Cabinet approval. With significantly reduced TfL funding there is a need to invest in our infrastructure

to support walking and cycling in the wider borough and it is currently anticipated that an additional £2m will be required over the next 4 years to deliver our strategic objectives outlined in the Brent Active Travel Implementation Plan.

Park Pavilions Improvements

- 10.38 There are a number of proposed improvements scheduled to cost £0.9m across 2025/26 and 2026/27 to park pavilions including replacing water piping and heating systems across the Borough to ensure they maintain health and safety compliant.

Regeneration

South Kilburn

- 10.39 During 2024/25 the remaining sites to be built from the 30 year South Kilburn programme began the transition from their original site by site delivery model budget to the Single Delivery Partner (SDP) model. Future year budgets from 2025/26 will reflect the Council's costs aligned to the revised programme of delivery under the SDP model. The SDP budget has been set at almost £60m for the five years from 2025/26 up to 2029/30. The South Kilburn programme as a whole maintains the principle of self-financing, and the costs and expenditure is forecasted to be covered by income through capital receipts and other sources of funding such as SCIL and infrastructure grant.
- 10.40 In 2025/26, a budget of more than £18m has been set for the South Kilburn sites, funded by a mix of capital receipts, grants from the Greater London Authority, and SCIL. The largest site works will be at Carlton & Granville, with over £6m of development costs to be delivered from the main works contract. There are £2m of main works costs scheduled to be delivered at NWCC. £1.5m of acquisition costs each are planned at the Austen & Blake and Masefield Wordsworth & Dickens sites. A £2m budget has been earmarked for Dunbar & Saville – the majority of costs relate to rehousing current residents. £1m has been set aside for SDP procurement work, and our ongoing consultancy work with Deloitte. Work begins on the delivery of two new South Kilburn schools (£1.2m in 2025/26), and the Queens Park Gyratory (£0.6m). The remaining £2m is for ongoing works for Hereford & Exeter, Peel, John Ratcliffe and Craik Crone Zangwell.
- 10.41 Meanwhile, the District Energy Network, currently approved by Cabinet at £17.5m has been included for delivery in this five year period.

Wembley Housing Zone

- 10.42 In December 2024 a £23.6m construction contract was signed with Wates to complete the Ujima House site by July 2026. Work has been well underway with Cecil Avenue since May 2024, and this is expected to complete in September 2026. The 2025/26 capital budget is £77.5m in respect of the

delivery of the Wembley Housing Zone programme. The funding is a broad mix of SCIL, GLA grants, s106, capital receipts and borrowing.

Other Regeneration Schemes

- 10.43 The 2025/26 Regeneration capital budget is rounded out by three other projects. This year will be the final year of delivery of three new Medical Centres in Brent (£1.1m); the Grand Union Canal Bridge, SCIL funded, with the remaining £6.6m of the scheme to be delivered equally during 2025/26 and 2026/27 (£3.3m each year). The Bridge Park Regeneration project is aiming to deliver improved leisure facilities and other community space, with £2m on viability, consultancy and design works budgeted this year.

Pipeline Regeneration Schemes

- 10.44 The Neasden Civic Partnership Programme, regenerating Neasden town centre, is proposed to cost £10.5m, and to be delivered over three years to 2027/28. The scheme has applied for £7.4m SCIL funding and £3.1m regeneration grant secured from the Greater London Authority.

Staples Corner Masterplan

- 10.45 The Staples Corner Growth Area Masterplan will improve accessibility between the Staples Corner industrial business park and the new Brent Cross Town development. The proposed Masterplan scheme is expected to cost £2m over the next 3 years and is funded by SCIL. The A5 Toucan Crossing (which allows pedestrians and cyclists to use the same crossing over busy roads) will provide a direct pedestrian / cycle link from the Staples Corner Growth Area to Brent Cross West Thameslink Station.

- 10.46 The Hillside Corridor (£0.8m) pipeline budget in 2025/26, funded by borrowing, will focus on the viability of the programme.

Children and Young People and Schools

SEND Expansion

- 10.47 The SEND programme continues with £12.6m capital budget allocated in 2025/26 (funded by the DfE's Basic Needs grant). The budgeted £12.6m spend in 2025/26 relates to completion of the new SEND school at London Road, and three Additionally Resourced Provisions (ARPs) that will complete for September 2025. An ARP is a provision, within a school, designed to provide specialist and targeted support for children with long term special educational needs.

Schools Asset Management Plan & Devolved Formula Capital

- 10.48 The Schools Asset Management Plan budget in 2025-26 is £2.4m. The School's AMP budget is fully funded by the Department for Education and the current three year allocation ends in 2025/26 (£2.4m pa). The AMP funding is

used to improve the condition of school buildings, ensuring the buildings are weathertight and provide a safe environment for education. An application has been made to renew the current grant agreement under the same terms with a proposed additional £7.2m grant request.

- 10.49 The Devolved Formula Capital funding, at £0.6m and funded by the DfE, covers the capital funding devolved to schools to use at their school site.

Post-16 Skills Centre

- 10.50 The budget for the Welsh Harp Post-16 Skills Centre in 2025-26 includes funding for design, surveys, and planning. The centres support young people aged 16– 25 with SEND. Additionally, the project is proposing further investment of £3m to deliver Post-16 skills centre at Airco Close and the horticultural centre at the Welsh Harp which is expected to be funded by £2m DfE Basic/High Needs grants, and £1m SCIL.

Youth Facilities Proposals

- 10.51 Officers will be taking youth facilities project proposals to Cabinet in early 2025 and subject to approval, will use the £0.5m budget for initial design and survey costs for the proposed youth facilities.

Statutory Capital & Treasury Reports

- 10.52 In recognition of the importance of capital investment in asset and treasury management to Council activities, CIPFA and central government have compiled codes of practice and regulations for Councils to follow. These ensure that Councils have effective processes and practices in place to control, manage and govern capital investment decisions, that include borrowing and treasury management practices.
- 10.53 The requirement on local authorities in relation to this statutory guidance is that they should “have regard” to such guidance and each year must produce a number of documents/strategies for approval by council or a nominated body.
- 10.54 The various statutory reports are as follows:
- Capital Strategy (high-level report covering the basics of capital programme, treasury management and investments for service commercial reasons) – Appendix F.
 - Non-Treasury Investment Strategy (disclose the contribution that investments make “towards the service delivery objectives and / or place making role of the local authority – Appendix G.
 - Treasury Management Strategy (the Chartered Institute of Public Finance and Accountancy’s Treasury Management in the Public Services: Code of Practice 2021 Edition (the CIPFA Code) requires the Council to approve a treasury management strategy before the start of each financial year. The strategy outlines a framework within which the Council manages its cash flows, borrowing and investments, and the associated risks – Appendix H.

- Minimum Revenue Provision (the process for calculating the annual charge to the revenue account of provision to repay debt incurred in respect of capital expenditure financed by borrowing or other long term credit arrangements (such as PFI) – Appendix I.

10.55 The statutory capital and treasury reports have been included here for noting in Appendices F – I.

11.0 Pay Policy Statement 2025/26

11.1 Section 38 of the Localism Act 2011 requires local authorities to publish an annual 'Pay Policy Statement', setting out their policies in respect of chief officer remuneration and other specified matters. Regard must be had to guidance to be published by the Secretary of State in preparing the statement, which must be approved by Full Council. The Council is then constrained by its pay policy statement when making determinations on chief officer pay, although the statement may be amended at any time by a further resolution of the Full Council. No new guidance has been published since the statement was adopted for 2024/25 and so there are no proposed changes to the statement related to the guidance. The Draft Pay Policy Statement, attached as Appendix N, contains minor updating and cosmetic changes from the Statement adopted by full Council for the last financial year.

12.0 Stakeholder and ward member consultation and engagement

12.1 Section seven of this report provides more details of the statutory consultation process with regards to setting the 2025/26 budget.

13.0 Financial Considerations

13.1 The Council's financial position has been set out in this report and Members are under a legal obligation to set a balanced budget. In doing so they are obliged, under normal administrative principles, to take into account the various relevant factors, particularly in respect of consultation and equalities. In doing so Members are, of course, entitled to exercise their political judgement, paying regard to the relevant factors rather than being absolutely determined by them.

13.2 The budget report sets out a comprehensive picture of the council's finances over the short, medium and long term to assist in the decision making process in setting the 2025/26 budget.

13.3 In considering the budget report, a key consideration should be the delivery of the savings programme as it presents substantial management challenges. Again, considerable management attention has been, and is being, devoted to ensuring that these can be delivered, but it is important to stress again the inherent risks in delivering such a complex programme.

13.4 In addition to the risk of delivery of the savings programme, there remains considerable uncertainty on the future of Local Government funding from 2026/27. In consequence, and following a comprehensive review of budget

assumptions, the general reserve is expected to increase to £20.3m to ensure that the Council continues to follow the principle set out in section six regarding the appropriate level of generally usable reserves. This level is still relatively low for London, but is not unreasonable.

13.5 That said, the budget now proposed is realistic and affordable, albeit challenging. The increases in Council Tax set out, if agreed, will generate significant additional revenue over time, minimising the number of difficult new decisions about funding for specific services to be proposed. If agreed, this budget would provide for affordable services in 2025/26.

13.6 Formally, this section of the report is the report of the Section 151 officer to which the Council is required by Section 25 of the Local Government Act 2003 to have regard, confirming that, if the budget as proposed were to be agreed, the estimates made for the purposes of the calculations are robust and the proposed financial reserves are adequate. The Section 151 officer concludes that the proposed level of reserves are adequate and the estimates underpinning the proposed budget are robust.

14.0 Legal Considerations

14.1 These are set out in Appendix M.

15.0 Equity, Diversity & Inclusion (EDI) Considerations

15.1 Section seven of this report provides more details of the approach to complying with the Equalities Act 2010 and the outcome of equalities impact assessments.

16.0 Climate Change and Environmental Considerations

16.1 Climate change and environmental considerations are taken into account as part of the budget development process. Each of the savings proposals set out in Appendices C (i) and C (ii) will have had regard to these considerations as they were developed.

17.0 Human Resources Considerations

17.1 Of the proposals set out in Appendices C (i) and C (ii), there are some where there is an impact on staffing and could be subject to redundancy.

17.2 The Council will apply its Managing Change Policy and Procedure in the application of all restructuring arrangements which have an impact on staff, consulting with staff and trade union representatives accordingly.

18.0 Communication Considerations

18.1 Section seven of this report provides more details of how the budget proposals have been communicated with residents, businesses and other key stakeholders.

Related document(s) for reference

Draft Budget 2025/26 - Cabinet 12 November 2024

Report sign off:

Minesh Patel

Corporate Director, Finance and
Resources

LIST OF APPENDICES

Appendix	Description
Appendix A	Overall Revenue Budget 2025/26
Appendix B	Medium Term Financial Strategy Model
Appendix C (i)	2025/26 Savings Agreed February 2024
Appendix C (ii)	New 2025/26 Savings
Appendix C (iii)	Full Equalities Impact Assessments
Appendix C (iv)	Cumulative Equalities Impact Assessment
Appendix D	Budget Scrutiny Task Group Findings Report
Appendix E	Capital Programme Pipeline
Appendix F	Capital Strategy 2025/26
Appendix G	Non-treasury Investment Strategy 2025/26
Appendix H	Treasury Management Strategy 2025/26
Appendix I	Minimum Revenue Provision (MRP) Statement 2025/26
Appendix J (i)	Reserves Strategy 2025/26
Appendix J (ii)	Schedule of reserves
Appendix K (i)	Fees & Charges Policy
Appendix K (ii)	Fees & Charges Schedule
Appendix L (i)	Summary of Budget Consultation
Appendix L (ii)	Consultation Direct Representations
Appendix M	Legal Advice
Appendix N	Pay Policy Statement 2025/26
Appendix O	HRA Business Plan

This page is intentionally left blank

Appendix A: Overall Revenue Budget 2025/26

The table below sets out the revenue budget for each directorate in 2025/26 and how this has changed from the 2024/25 budget.

Page 237

	2024/25 Current Budget £m	Growth £m	Savings £m	Changes in Funding £m	2025/26 Approved Budget £m
Service Area Budgets					
Service Reform and Strategy Children, Young People and Community Development	164.4	18.0	(4.6)		177.8
Neighbourhoods and Regeneration	93.9	5.4	(2.0)		97.3
Finance and Resources	33.9	0.6	(0.5)		34.0
Residents and Housing Services	29.2	0.8	(0.8)		29.2
	20.2	11.2	(1.0)		30.4
Total Service Area Budgets	341.6	36.0	(8.9)	0.0	368.7
Central Budgets	45.4	16.0			61.4
Total Budget Requirement	387.0	52.0	(8.9)	0.0	430.1
Funding					
Revenue Support Grant	(30.9)			(0.6)	(31.5)
Business Rates	(114.1)			(11.0)	(125.1)
Council Tax	(162.1)			(16.3)	(178.4)
Specific Grants	(79.9)			(15.2)	(95.1)
Total Funding	(387.0)	0.0	0.0	(43.1)	(430.1)

Departments

Service Reform and Strategy	The services within this directorate include: Adult Social Care, Strategic Commissioning, Capacity Building & Engagement, Integrated Care Partnership, Public Health, Leisure and Parks, Communications, Insight & Innovation and the Corporate Change programme.
Children, Young People and Community Development	The services within this directorate include: Children's Social Care, communities, strategy and partnerships and employment skills and enterprise.
Neighbourhoods and Regeneration	The services within this directorate include: inclusive regeneration & climate resilience, property & assets and public realm.
Finance and Resources	The services within this directorate include: finance, legal, shared IT services, democratic services, HR & organisational development and organisational assurance & resilience.
Residents and Housing Services	The services within this directorate include Resident Services, Housing Needs and Support, as well as Housing Services (Housing Revenue Account)

The table above reflects changes to Brent's departmental structure that will come into effect from 1st April 2025

Appendix B: MTFS Model

CHANGES TO THE BUDGET YEAR-ON-YEAR	BUDGET		ADJUSTMENTS		BUDGET		Relative Changes 2024/25 to 2025/26
	2024/25 £m	Growth £m	Savings £m	Changes in Funding £m	2025/26 £m		
Base Budget	387.0				387.0		
Growth							
Demographics							
- Adult Social Care		7.3			7.3		
- Children's Social Care		3.0			3.0		
- Other Departments		1.0			1.0		
Sub-total		11.3			11.3		
Inflation							
- Adult Social Care		4.9			4.9		
- Children's Social Care		1.5			1.5		
- Contracts		2.0			2.0		
Sub-total		8.4			8.4		
Temporary Accommodation		11.6			11.6		
Capital Programme Financing		10.6			10.6		
Service Changes		10.1			10.1		
		52.0					
Savings							
Service Transformation			(2.7)		(2.7)		
Restructure			(2.2)		(2.2)		
Reduction in provision			(1.6)		(1.6)		
Procurement			(0.2)		(0.2)		
Income generation			(1.6)		(1.6)		
Digital			(0.6)		(0.6)		
			(8.9)				
	387.0				430.1		
Funding							
Revenue Support Grant	(30.9)			(0.6)	(31.5)		
Business Rates	(114.1)			(11.0)	(125.1)		
Council Tax	(162.1)			(16.3)	(178.4)		
Specific Grants	(79.9)			(15.2)	(95.1)		
	(387.0)				(430.1)		

MTFS ASSUMPTIONS	
Growth	The growth proposals in the budget are largely responsive in nature rather than introducing new service provision. This is a direct result of the volatile and unpredictable economic climate faced by the Council where rising demand and demographic pressures increase the cost of providing existing services to current service standards.
Demographic Growth	This largely relates to changes in the make up of the population due to ageing (Adult Social Care) and demand pressures on the placements, transitions, homecare and children with disabilities budgets (Children's Social Care).
Inflation	General inflation fell below the the Bank of England's target with CPI in September 2024 at 1.7%, although this has increased again to 2.5% at December 2024. Specific inflationary pressures are being experienced in social care where rising demand and a shortage of supply puts upwards pressure on prices. These inflationary pressures have direct effects on goods and services bought by the council and indirect effects via increased prices for services and supply contracts.
Capital Programme Financing	The inflation crisis since 2021 resulted in the Bank of England raising the base rate from a historic low below 1% up to 5.25% at its recent peak. As of December 2024, the base rate remains at 4.75% and is expected to remain at a higher level than before the crisis began. This means that, coupled with the inflationary pressures on the programme itself, the cost of financing the Capital Programme has increased significantly since the plans were produced and growth is required to ensure the budget is sufficient to ensure the continued affordability of the programme.
Temporary Accommodation	In recent years, Brent has seen a surge in cases of homelessness in which the authority has a statutory duty to provide accommodation. Due to a severe lack of available and affordable properties, high inflation and the limitations of the Housing Benefit system, Brent has been required to use a growing amount of expensive temporary accommodation, including B&Bs, the cost of which has increased rapidly at the same time.

Service Changes - Other	These are unavoidable changes resulting from new burdens, increases in ringfenced grants and externally driven changes to service levels, for example concessionary fares. It includes the pay award, which has been higher than the norm in recent years As a response to inflation and the cost of living crisis. With inflation having fallen, growth for the pay award is lower in 2025/26, but if inflation remains above the Bank of England's 2% target, a higher pay award may be expected. If future pay awards are based on flat rate increases, this tends to increase the cost of the pay award at Brent due to extra London weighting and the associated increase in national insurance and pensions on costs.
Savings - Full Details in Appendix C	New savings proposals for agreement total £4.5m. These are in addition to the savings of £4.4m agreed in the 2024 Budget and Council Tax Report, which will also be delivered in 2025/26. The total savings for 2025/26 is £8.9m.
Service Transformation	These are savings which involve changing methods of service delivery to match current demand levels whilst delivering the service in the most efficient, effective and economic manner.
Restructure	These are savings which require changes to the staffing establishment.
Reduction in provision	These are savings where the level of provision will be reduced. Whilst as a matter of policy the Council aims to avoid cuts to frontline services, in order to balance the budget a number of small cuts to service provision have been proposed where the impact on service users will be minimal.
Procurement	These are efficiency savings arising from securing better value for money and lower prices for contracts let by the Council without an adverse impact on service quality or the level of service provision.
Income generation	These are savings arising from the generation of additional external income. This includes the implementation of telecare service charges and contributions from Public Health to delivery of mental health services and Speech and Language Therapy in Family Wellbeing Centres.
Digital	These are efficiency savings arising from the better use of software and digital transformation, whilst improving the customer experience.
Funding	
Revenue Support Grant (RSG)	The 2025/26 RSG allocation of £31.5m has been calculated by uprating the 2024/25 amount by an indexation factor based on the September 2024 CPI inflation increase of 1.7%. It is anticipated that future years will be calculated in the same way.
Business Rates	The Government introduced separate standard and small business rates multipliers in April 2024. The standard multiplier has been uprated by the 1.7% September 2024 CPI rate. The small business multiplier has been frozen with local authorities compensated for the loss of additional income via s31 grant based on the yield if the multiplier had increased by the September 2024 CPI rate. The rating list was revalued with effect from April 2023 and 2025/26 is expected to be the final year of the current valuation, with a new revaluation taking place in April 2026. To keep the effect of the revaluation as revenue neutral, the increase in the retained business rates share has been reduced to zero by reducing the amount of the top up thus keeping the Baseline Funding Level unchanged. The government has also announced their intention to reset the Business Rates retention system in April 2026. Details of this will not be announced until later, but it is expected that this will result in some changes to how Brent receives funding and how much is received through the Business Rates Retention system from 2026/27.
Council Tax	The increase in Council Tax income in 2025/26 arises from four elements: 1. A 2.99% increase in Council Tax + a 2% Adult Social Care precept (+£9.4m) 2. An increase in the tax base (+£1.7m) 3. A reduction in the long term collection rate assumption from 97.5% to 97.0% (-£0.9m) 4. The proposed revision of the Council Tax Support Scheme, to be approved at the same Full Council meeting as the Budget & Council Tax report on 27 February 2025 (+£6.1m)
Specific grants	The government has uprated some existing grants, particularly the Social Care grant (up 18%) and introduced a new Children's Social Care Prevention Grant (£1.3m) for expenditure on prevention activities. The existing Improved Better Care Fund and Discharge Grant (previously assumed in the MTFs to not continue in 2025/26) have been merged into the Local Authority Better Care Grant, but no uplift has been applied. The government has also replaced a number of smaller grants, including the Services Grant with a new unringfenced Recovery grant, with the allocation based on targeting at those authorities with greater needs, but were also clear that this is only the first step towards fundamental reforms of local government funding in 2026/27. It is therefore unclear how much of this additional funding will be received beyond 2025/26. Brent's New Homes Bonus allocation has continued to decline to £1.9m from £2.9m in 2024/25. Also the Funding Guarantee from 2024/25 was a Funding Floor (applied to ensure no authority received a reduction in Core Spending Power). As Brent received an increase of 6.2% in Core Spending Power, this funding was not applicable. However, these two grants are not included in the MTFs due to the uncertainty of how much will be received each year. Outside of Core Spending Power, the Public Health Grant is expected to be uprated by inflation and a grant of c.£3m is expected from government to fund the changes to the National Insurance employer's contribution rate and threshold from April 2025.

SPECIFIC GRANTS		2024/25	2025/26	Difference
		£m	£m	£m
Local Authority Better Care Grant		-	16.5	16.5
Improved Better Care Fund		13.4	-	13.4
ASC Discharge Fund		3.1	-	3.1
Social Care Grant		29.2	34.4	5.2
ASC Market Sustainability and Improvement Fund		5.9	5.9	-
Children's Social Care Prevention Grant		-	1.3	1.3
Total Social Care Grants		51.6	58.1	6.5
Recovery Grant		-	5.8	5.8
Services Grant		0.6	-	0.6
Other grants		27.7	31.2	3.5
Total Specific Grants		79.9	95.1	15.2

This page is intentionally left blank

2025/26

SAVINGS PROPOSALS Agreed February 2024

Dept	Reference No.	Project/ Proposal	Headline Description of Savings Proposal	2025/26 £000
Service Reform and Strategy	2024-25 CHW01	Technology Enabled Care	Enabling residents to self-manage their health and well-being, including preventing and reducing the need for care and support through technology so they can stay independent and well in their homes and communities	350.0
Service Reform and Strategy	2024-25 CHW02	Managing demand at the front door, prevention and early intervention	Managing demand and complexity of support to 23/24 with a consistent prevention and reablement offer and a focus on Care Act statutory responsibilities including integrated market management	365.0
Service Reform and Strategy	2024-25 CHW03	Continuing sustainable long-term care and support needs costs that promote independence	Reducing expenditure in mental health and learning disability including transitions so Brent benchmarks in the middle quartile with comparator authorities	275.0
Service Reform and Strategy	2025-26 CHW01	Reduction in building based provision to support individuals to access services more tailored to meet their needs and interests	Developing a wider range of day opportunities with partners and communities and reducing building based provision	500.0
Service Reform and Strategy	2025-26 CHW02	Review of housing related support contracts and focus on Care Act duties	Reduction of contract value at 3 year break point for Homeless and ex-offenders	500.0
Service Reform and Strategy	2025-26 CHW03	Workforce Efficiency	Commitment to reducing staffing cost across the Care, Health and Wellbeing Directorate	300.0
Service Reform and Strategy	2024-25 RS01A	Increased use of automation	Based on 3 complex and 5 simple processes per year across all former Resident Services departments (focusing on transactional services) with efficiencies cashed through reduction in posts and/or increase in income.	49.0
Service Reform and Strategy	2024-25 RS02	Business support efficiencies	Reduction in business support posts through alignment of support functions across former Resident Services directorate, combined with improved forms and integration with back-office systems.	95.0
Children, Young People and Community Development	2024-25 RS01B	Increased use of automation	Based on 3 complex and 5 simple processes per year across all former Resident Services departments (focusing on transactional services) with efficiencies cashed through reduction in posts and/or increase in income.	13.0

Dept	Reference No.	Project/ Proposal	Headline Description of Savings Proposal	2025/26 £000
Children, Young People and Community Development	2025-26 CYP01	Review of the Willow Nursery delivery model	Review the Willow Nursery delivery model to ensure the provision is sustainable without funding from the General Fund.	250.0
Children, Young People and Community Development	2025-26 CYP02	Set up and run new residential children's home. (Forward Planning Performance and Partnerships / Looked After Children and Permanency)	Reduction in the placement budget for Looked After Children through operating a new residential children's home in Brent	290.0
Children, Young People and Community Development	2025-26 CYP03	Reduction in management capacity within Early Help and Localities. Redefining early help and bringing early help practitioners under the management of social care teams – particular focus on restructuring edge of care work. (Early Help / Localities)	Reduction in management capacity within Early Help and Localities, through service realignment. This will entail a restructure and HR consultation. This will result in fewer handoffs for families and a more seamless step up and step down. Equivalent of up to 6 FTE. Review will also consider replacement of some social work posts with business support replacements where safe to do so.	330.0
Children, Young People and Community Development	2025-26 CYP04	Short breaks – selling increased respite bed nights at the Council-run Short Break Centre to other local authorities. (FPPP/Localities)	The proposal is that the Ade Adepitan Short Break Centre could generate further income by selling additional respite bed nights to other local authorities. Income generation. Current income target is £140k. Ensure centre capacity is managed effectively to allow an increase of bed nights sold by an additional 52 nights per annum.	40.0
Children, Young People and Community Development	2025-26 CYP05	Reduce the Family Wellbeing Support service contract by 10% when it expires. (Early Help)	To reduce the Family Wellbeing Centre (FWC) support service contract by 10% Contract currently operated by Barnardo's that provides a range of support services for families from the FWCs including general advice and parenting support. Contract expires in November 2024.	64.0
Children, Young People and Community Development	2025-26 CYP06	Reduce general fund contribution to commissioned services	Reduce general fund contribution to commissioned services that support children's school readiness and health and wellbeing through a joint commissioning approach within the ICP.	500.0

Dept	Reference No.	Project/ Proposal	Headline Description of Savings Proposal	2025/26 £000
Finance and Resources	2025-26 G01	Review of support arrangements in Executive and Member Services	There is scope to reduce the amount of administrative support provided within the service.	60.0
Finance and Resources	2025-26 G02	Legal Services – change approach to training posts	Currently Legal Services has three traditional graduate level trainee solicitor posts. It is proposed to reduce this to one post. As trainees are a valuable source of recruits to qualified posts, it is proposed to over time convert two existing Legal Assistant posts to solicitor apprentice posts. These require a lower level of qualification, and the Apprenticeship Levy can be used to fund the qualification element of the training.	45.0
Finance and Resources	2025-26 G03	Increase income target for services to schools and for legal charges to third parties	Income from these sources has increased, for example through more schools buying into the services available from the Governance Department and work undertaken in relation to developments.	23.8
Page 245 Finance and Resources	2025-26 G04	Changes to the Health and Safety team	It is proposed to reduce the health and safety team by one post to reflect lower demand due to changes in the way training on Health and Safety is delivered and to the type of incidents in which the central team are required to be involved. Change in approach to schools inspections.	57.0
Finance and Resources	2025-26 G05	Discontinue use of underutilised IT on-line systems/services	A review has identified several underutilised resources across the Governance department and ceasing to subscribe to these will enable savings to be made.	16.0
Finance and Resources	2024-25 RS08	Revenue and Debt	To not recruit to vacant posts / move to digital – self-service / reduction in usage of Resilience Contract	32.5
Neighbourhoods and Regeneration	2024-25 RS01C	Increased use of automation	Based on 3 complex and 5 simple processes per year across all former Resident Services departments (focusing on transactional services) with efficiencies cashed through reduction in posts and/or increase in income.	33.0
Neighbourhoods and Regeneration	2024-25 RS02	Business support efficiencies.	Reduction in business support posts through alignment of support functions across Resident Services, combined with improved forms and integration with back-office systems.	27.0
Residents and Housing Services	2024-25 RS01D	Increased use of automation	Based on 3 complex and 5 simple processes per year across all former Resident Services departments (focusing on transactional services) with efficiencies cashed through reduction in posts and/or increase in income.	55.0

**2025/26
SAVINGS PROPOSALS Agreed February 2024**

Dept	Reference No.	Project/ Proposal	Headline Description of Savings Proposal	2025/26 £000
Residents and Housing Services	2024-25 RS06	Libraries and Heritage - realignment of managerial responsibilities and posts	The restructure will focus on maximising income generation and delivering savings in 2025/26.	48.0
Residents and Housing Services	2024-25 RS08	Revenue and Debt	To not recruit to vacant posts / move to digital – self-service / reduction in usage of Resilience Contract	32.5
Residents and Housing Services	2024-25 RS09	Customer Services and Assessments	Reduction in Benefit Assessment processing costs due to impact of Universal Credit (UC)	61.0
			Total	4,412

**2025/26
NEW SAVINGS PROPOSALS**

Department	Reference	Proposal	Saving 2025/26 £000
Service Reform and Strategy	CHW01 25-26	Offer reablement service to a wider range of customers, supporting them to remain independent and reduce their reliance on long-term care services.	800
Service Reform and Strategy	CHW02 25-26	Expand the Shared Lives programme to be able to provide additional respite capacity for individuals with learning disabilities and reduce reliance on residential respite placements.	200
Service Reform and Strategy	CHW03 25-26	Modernise Adult Social Care Approach to Assessment and Review.	200
Service Reform and Strategy	CHW04 25-26	Implementation of Telecare Service Charges.	500
Service Reform and Strategy	PHRS02 25-26	Staffing efficiencies within the Communications, Insight and Innovation department.	316
Service Reform and Strategy	PHRS03 25-26	Increasing commercial income generated from The Drum.	100
Service Reform and Strategy	PHRS07 25-26A	Staffing efficiencies within the Communities and Partnerships Department.	4
Subtotal SR&S			2,120
Children, Young People and Community Development	CYP01 25-26	LAC and Permanency/FPPP: Reduction in weekend use of the Gordon Brown Centre for care leavers as part of promoting independence work by 50% from £160k to £80k annually.	80
Children, Young People and Community Development	CYP02 25-26	FPPP: Reduction in discretionary spend of when supporting children and families.	300
Children, Young People and Community Development	CYP03 25-26	Inclusion/Brent Virtual School: Cease the Safe Base Brent offer, which is a Mental Health and Wellbeing support service for care leavers attending higher education.	57
Children, Young People and Community Development	PHRS07 25-26B	Staffing efficiencies within the Communities and Partnerships Department.	63
Subtotal CYP&CD			500
Residents and Housing Services	PHRS01 25-26	Staffing efficiencies and contract spend within the Shared Technology service.	200
Residents and Housing Services	PHRS04 25-26	Achieving management efficiencies across Revenue and Debt, Customer Services and Assessments and Brent Community Hubs.	375
Residents and Housing Services	PHRS05 25-26	Achieving management efficiencies within Libraries, Arts and Heritage.	50
Residents and Housing Services	PHRS06 25-26	Increased income across Mortuary & Bereavement Operations (including Cemeteries) and Registration and Nationality.	184
Subtotal R&HS			809
Neighbourhoods and Regeneration	NR01 25-26	Increase charge for bulky waste collection from £40 to £55.	30
Neighbourhoods and Regeneration	NR02 25-26	Increase garden waste annual subscription from £65 to £69.	55
Neighbourhoods and Regeneration	NR03 25-26	Increase to existing, or introduction of new, charges for additional and replacement waste containers (residual, recycling, food).	105
Neighbourhoods and Regeneration	NR04 25-26	Stop subscription for Recyclopeda.	6
Neighbourhoods and Regeneration	NR05 25-26	Transformation restructures across public realm, regeneration and strategic housing.	250
Neighbourhoods and Regeneration	PHRS07 25-26C	Staffing efficiencies within the Communities and Partnerships Department.	8
Subtotal N&R			454
Finance and Resources	FR01 25-26	Transformation restructures across Finance and Resources.	260
Finance and Resources	LG01 25-26	Reduction in Members Allowances budget.	50
Finance and Resources	LG02 25-26	Reduction In Car Club costs.	50
Finance and Resources	LG03 25-26	Outsource Occupational Health Service.	100
Finance and Resources	LG04 25-26	Deletion of two Trainee positions in Legal Services.	87
Finance and Resources	LG05 25-26	Increase in income – Legal Services Property and planning.	13
Subtotal F&R			560
Grand Total			4,443

This page is intentionally left blank

2025-2026 EQUALITY IMPACT ASSESSMENTS

1. 25/26 CHW02: Increase Shared Lives capacity to provide as an alternative to respite in residential care
2. 25/26 CHW04: Implementation of Telecare Service Charges
3. 25/26 CYP01: LAC and Permanency/FPPP: Gordon Brown Centre Reduction in the Contribution for Promoting Independence work to Care Leavers by 50%
4. 25/26 CYP02: Reduction in discretionary spend on the use of taxis and client subsistence payments
5. 25/26 CYP03: Cease the Safe Base Brent offer
6. To increase Council Tax by 4.99% in 2025/26
7. To amend the Council Tax Support Scheme in 2025/26

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Increase Shared Lives capacity to provide as an alternative to respite in residential care
DEPARTMENT:	Adult Social Care
TEAM:	Shared Lives Team
LEAD OFFICER:	Leon Gooding
DATE:	8th January 2025

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.

Brent Shared Lives is a Care Quality Commission (CQC) regulated in-house service and can be compared to adult fostering. The service can support customers with a range of support needs such as learning disabilities and mental health. It is a real alternative to someone who does not wish to live in more traditional restrictive models of care such as residential care or supported living. The customer moves into their carer's homes. The customer receives around the clock care according to their assessed eligible care needs. In return, the carers, who are registered as self-employed, will receive a weekly payment for the service they provide as well as annual essential and bespoke training to ensure they maintain the skill set to meet the customer's needs.

Brent Council is proposing to broaden our Shared Lives Offer for clients diagnosed with a Mental Health, Learning Disability and or autism spectrum disorder.

The service currently consists of 12 long term customers, 8 full time-Shared Lives Carers and 4 respite only carers. The shared life option offers a long term, customer focused placement, where the customer, the carer and the customers family can create a life where the customer feels comfortable with, enabling them to thrive, maintain and develop their life and social skills. This option will also impact positively on current financial pressures the authority now faces, by providing quality-based cost-effective placements for our customers as an alternative to the more expensive residential and supported living options. The scheme will also provide incomes for Shared Lives Carers in the local Brent community which will stimulate the local Job Market.

The proposal is to at least double the intake of Shared Lives Carers and provide more placements within the community, positively contributing towards the council's long-term savings plan, whilst continuing to offer quality based, cost-effective long term and respite placements within the community.

Shared Lives offers people who require care and support the opportunity to live independently in the community and can be an alternative to living in a care home, housing with care or housing with support. The Shared Lives scheme matches people who need care and support with an approved carer. The carer shares their family and community life and gives care and support to the person with care needs. Some people live with their Shared Lives carer, while others are regular day-time visitors. Some people combine day-time visits with overnight stays. Carers can support up to three people at one time. Shared Lives schemes have also been known as adult placements.

The success of Shared Lives is largely dependent on achieving a good match between people and their carers. Shared Lives carers are carefully selected and trained by regulated Shared Lives schemes, with the goal of enabling people to benefit from an individual and highly personalised service. Shared Lives carers are trained and paid, and they spend time with the individual they are matched with, working together to achieve meaningful outcomes as part of their identified Care Act needs.

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

All customers who meet the Care Act 2014 eligibility criteria and need, or currently receive a package of care which includes accommodation can be considered for the Shared Lives options either after their initial assessment or during the review of their current care package.

Carers in the community who are already a Shared Lives Carer or those who meet the criteria for Shared Lives and wish to become a Shared Lives Carer. Shared Lives Carers will have the opportunity to take on more customers on a long-term basis or provide respite care to current and new customers.

There may be a reduction in the usage of current external supported living and respite placements in favour of Shared Lives placement options.

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, the affected customer group have disabilities which are protected characteristic under the Equality Act 2010. The current cohort have disabilities that can be described Cognitive, Mental and/or Physical which have a substantial and long – term adverse effect on that person's ability to carry out normal day-to-day activities.

There are Three aims of the general equality duty which includes

- **Eliminate unlawful discrimination**, harassment and victimisation
- **Advance equality of opportunity** between people who share a “protected characteristic” and those who do not
- **Foster good relations** between people who share a protected characteristic and those who do not

The proposal will continue to promote inclusion for our customers with a disability as described above, by supporting and training Shared Lives Carers with bespoke and essential training, ensuring that they are well equipped to support the customer (s) to integrate fully, safely, and appropriately into their local community, whilst offering protection from unlawful discrimination.

The customer will benefit by having on-going holistic package of care and support within a home setting through a consistent Shared Lives Carer whom they can rely on to support them to build on and expand their social and life skills both within the home and community by including them in family and social activities. Customers will be able to safely access the community independently or with support and have safe and varied interactions with the wider community.

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		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.

Financial consideration:

The weekly scale of pay received by Shared Lives Carers is dependent on the assessed level of support required by the customer. There are 3 bands of pay. They are as follows:

Placement costs: Shared lives	Average Placement costs: Learning Disabilities Supporting People Living	Average Placement costs: Mental Health Supporting People Living
Band 1 - £531.02 PW Band 2 – £460.47 PW Band 3 - £389.85 PW (Average cost per week £460.44)	£1401 per week Average saving per client £940 per week	£ 707 per week, Average saving per client £246 per week

There are currently 4,323 people receiving social care services in the London Borough of Brent. Of these people, 2,069 do not make any contribution to their care costs.

As part of the Shared Lives agreement, customers will make a small weekly contribution towards the cost of household utilities and the rental part of the agreement which is covered by Housing Benefit.

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>The service provides support to customers from the age of 18 years and upwards. Customers under 18 are not considered for the Shared Lives Scheme and would not be entitled to a placement. Customers under 18 would be placed with the children’s social care teams.</p> <p>Shared Lives can provide respite to unpaid family carers, to help with long-term succession/contingency planning for older family carers. The service provides an interim step-down placement for older people discharged from hospital as they regain their independence in the community as an alternative to more restrictive types of care, such as residential homes. This also reduces the likelihood of readmission to hospital.</p> <p>The service supports older people with dementia to engage in community life in their local, familiar surroundings.</p>
---	---

DISABILITY

<p>Details of impacts identified</p>	<p>Shared lives schemes support adults with learning disabilities, mental health needs and physical disabilities either in a long-term placement, day support or respite. People benefit from consistent support from a carer who knows them well and build meaningful relationships.</p> <p>The service provides a live-in family environment, developing long-lasting relationships with the shared lives carer and a family network. People are supported to engage in their wider community, gain employment and participate in social activities.</p> <p>The service is an alternative to more traditional and restrictive kinds of care, such as care homes.</p> <p>Customers with profound physical and mental disabilities or a forensic history are not currently placed within the scheme due to the level of support and risks involved to both the Shared Lives Carer and any other Customer supported by the Shared Lives Carer.</p>
---	---

RACE

Details of impacts identified	<p>Shared Lives matches customer's needs to a registered carer and their family. The matching process takes into consideration ethnicity and cultural needs as well as any specific support needs.</p> <p>The service provides carers with training to develop skills in person centred care to deliver culturally appropriate care. Cultural needs are identified and included in assessments and detailed in care plans considering ethnic needs in many aspects such as meals, activities and getting feedback from customers and their families to understand their values and what is important to them.</p> <p>The service promotes cultural competence and implements anti-discriminatory practices. Carers are supported to understand and meet the diverse needs of customers using the service.</p>
--------------------------------------	---

SEX

Details of impacts identified	N/A
--------------------------------------	-----

SEXUAL ORIENTATION

Details of impacts identified	N/A
--------------------------------------	-----

PREGANCY AND MATERNITY

Details of impacts identified	N/A
--------------------------------------	-----

RELIGION OR BELIEF

Details of impacts identified	N/A
--------------------------------------	-----

GENDER REASSIGNMENT

Details of impacts identified	N/A
--------------------------------------	-----

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	N/A
--------------------------------------	-----

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

No.

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

No, the proposal is to expand the current model which will not have a negative impact on current clientele.

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

None.

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?

This is not a policy change therefore there is no perceived impact on the current Customer base supported by Brent Shared Lives or the future expansion of this service.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive

equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Based on the information provided, the expansion of Shared Lives will not have a negative impact on equality for customers.

Positive equality impacts have been identified and they include:

- More cultural, religious, and ethnic placements on offer to better match our customers according to their assessed care and support needs and preferences.
- Average length of placement for a customer living with in a Shared Lives Service is 11 years, this compares favourably to residential care or supported living options in terms of duration and meeting their assessed care and support needs.
- Provision of bespoke and essential training to ensure the Shared Lives Carers have the required knowledge and skills to meet the needs of our customers.
- Reduction in the cost of care for customers, which will positively impact the financial constraints faced by Brent Council as a local authority.
- Provide an income for Shared Lives Carers in the local Brent community which will stimulate the local Job Market.

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.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Thomas Atkinson
REVIEWING OFFICER:	Leon Gooding
HEAD OF SERVICE / Operational Director:	Leon Gooding

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Charging for Telecare Services
DEPARTMENT:	Adult Social Care
TEAM:	Commissioning, Contracting and Market Management
LEAD OFFICER:	Andrew Davies
DATE:	23rd December 2024

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

SECTION A – INITIAL SCREENING

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

Brent Council is proposing to charge for telecare services. Before doing this, the changes proposed will be consulted on with ASC service users, telecare service users and the public in Brent. The level of charge is to be determined but will be included in the consultation plan.

Local authorities are able to charge people for the adult social care services they receive. This includes telecare services.

Brent Council contracts with Harrow Council for the provision of a 24/7 specialist telephone helpline and contact centre (Harrow Helpline Services). The service monitors individuals' wellbeing in the home or outside in the community where assisted technologies such as tele-care alarms or GPS tracking systems are in place. The service will also co-ordinate tele-care equipment supply and maintenance.

The telephone helpline and contact centre is part of a wider approach to increase the use of 'at a distance' support that allows vulnerable people to go about their daily activities with minimal intervention, while offering the right amount of support at the critical times it is needed, at any time of the day or night.

The Care Act 2014 places emphasis on prevention and independence as ways of achieving and exceeding the desired outcomes for service users and carers. The 24/7 telephone helpline services and contact centre fulfil these requirements for a group of vulnerable people with unpredictable, unexpected, emergency needs.

Adult Social Care has set up a Transformation Programme which includes a Technology Enabled Care (TEC) workstream, with the aim of developing a new offer and model of provision. The services provided within this contract are within the scope of the workstream and will be reviewed as part of the developments during the coming year, with the intention of procuring a new service which can meet the requirements defined through the review process. For this reason, procuring a service which only meets the current specification does not make strategic or financial sense at this time.

In the meantime, the council plans to start charging people for their telecare installation and monitoring services. Council budgets are under increasing pressure and this is an area of service that the council can no longer afford to subsidise. Consequently charging proposals are to be consulted on that will have an impact on current telecare service users and future service users.

There are some important principles that guide the way Brent charges for care services –

- Everybody who receives an adult social care service has a financial assessment, which works out whether they have to pay towards their care. Nearly 50% of people receiving care services pay no charge at all.
- Nobody will be expected to pay more for care than they can afford. Nor will anybody be expected to pay more than the cost of delivering their care package.
- The council supports people to maximise their incomes and also takes into account expenditure that people incur because of their disability or vulnerability, and disregards this expenditure when working out care charges.

The charges that the council implements for its adult social care service are essential to ensure that the service remains sustainable in the years to come. Without the income from service user charges, adult social care services would not be sustainable.

The council is placing greater emphasis on preventative services and supporting people to remain as independent as possible for as long as possible.

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

There are currently around 3,000 people in Brent who receive telecare services in Brent. However, the information held on these individuals is not particularly detailed. There are number of reasons for this –

- Information on telecare connections are not recorded on Mosaic and so cannot be matched to other social care records
- Telecare is not just prescribed by ASC staff but is also prescribed by NHS workers. As a result, Brent Council does not hold a complete record of the number of people with telecare connections in Brent. This information is held by Harrow Careline that monitors all telecare connections.
- Whilst Harrow Careline shares connection information, not all recipients are known to ASC.

Despite these issues with telecare data, it is fair to assume that the majority of people with telecare connections are older people with vulnerabilities. Many (but not all) will be in receipt of social care support in addition to their telecare services. But, further work will need to be completed to better understand the characteristics of those receiving telecare.

8. 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. The changes proposed will have an impact on people with a disability and older people who are receiving telecare services.

9. 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	

10. 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

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

As set out above, further work needs to be done to examine in detail the information held on people who receive telecare services. This will be carried out ahead of consultation starting on the charging proposals.

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

AGE

Details of impacts identified	<p>The majority of people receiving adult social care services are over the age of 65, although there is a significant minority of people who are of working age. Inevitably these changes will have a greater impact on the disposable incomes of older people because of the nature of the ASC client group and those who receive a telecare service. Ensuring that adult social care services are sustainable is essential, and charging those who can afford to pay towards their care is an important element of this. So whilst some older adults who can afford to pay more towards their care will be most affected by this change, the benefit of ensuring a sustainable service will also be felt by older people who use social care support.</p>
--------------------------------------	--

DISABILITY

Details of impacts identified	<p>Adult social care services support disabled and vulnerable people with the care that they need to live their life in the best way possible. The potential impact on disabled people is very similar to that on older people, particularly on their income if they have to pay more towards their care. Ensuring that adult social care services are sustainable is essential, and charging those who can afford to pay towards their care is an important element of this. So whilst some disabled people who can afford to pay more towards their care will be most effected by this change, the benefit of ensuring a sustainable service will also be felt by disabled people who use social care support.</p>
--------------------------------------	--

RACE

Details of impacts identified	<p>Two thirds of Brent’s Adult Social Care service users are from ethnic minority backgrounds, and again the impacts as a result are very similar as for older people and those with disabilities – people from ethnic minority backgrounds will be impacted, but mitigations will be available to support those who need it.</p>
--------------------------------------	---

	Ensuring that adult social care services are sustainable is essential, and charging those who can afford to pay towards their care is an important element of this. So whilst some people from ethnic minority backgrounds who can afford to pay more towards their care will be most effected by this change, the benefit of ensuring a sustainable service will also be felt by all people who use social care support.
--	---

SEX

Details of impacts identified	Fifty six percent of ASC service users are female; 44% are male. Whilst there is a slight variation, and clearly more female service users, the impacts on both female and male service users will be the same and the same mitigations apply to both females and males.
--------------------------------------	--

SEXUAL ORIENTATION

Details of impacts identified	N/A
--------------------------------------	-----

PREGANCY AND MATERNITY

Details of impacts identified	N/A
--------------------------------------	-----

RELIGION OR BELIEF

Details of impacts identified	N/A
--------------------------------------	-----

GENDER REASSIGNMENT

Details of impacts identified	N/A
--------------------------------------	-----

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	N/A
--------------------------------------	-----

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

No. Brent is able to charge for telecare care services. The main issue with the changes proposed is that the council takes steps to minimise the impact on individuals, as outlined in the EIA, and that nobody is asked to pay more than they can afford for care.

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

Yes. A full public consultation will take place in early 2025 before any charges are implemented. All ASC service users will be written to offering people a chance to respond to the proposed changes, and there will be a series of public meetings to seek feedback from service users and their carers. A full consultation and communications plan will be developed. For those people who require it, translated copies of the consultation documents will be made available and easy read versions will also be produced.

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

A full analysis of telecare customers will be carried out to see what equalities information can be obtained before the consultation begins.

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

The negative impact of the changes are that telecare service users will be asked to pay for these services. The importance of charging for adult social care services cannot be overstated. Without income from service users able to pay for care the service isn't sustainable, and the council needs to take steps to ensure that the policy remains fair to service users, but also enables those who can afford it to be charged their contribution for care services.

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

The impact of the policy will be monitored in a number of ways –

- Monitoring of the number of service users who choose to keep their telecare.
- Monitoring the impact on telecare take up for new service users.
- Monitoring the additional income generated by the proposal to support ASC budgets.

SECTION C - CONCLUSIONS

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

The mitigating actions are set out in this EIA, but include –

- Confirmation that telecare will be considered as part of the financial assessment process.
- Use of disability related expenditure exceptions in financial assessments, where evidence supports this. DRE is disregarded when undertaking a financial assessment.

- Income maximisation activities, including benefit take up, already offered by the council will be promoted to ASC service users.

SECTION D – RESULT

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

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	X
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.

Action	Expected outcome	Officer	Completion Date
Full analysis of telecare service users	An understanding of numbers, how many have care packages, how many people unknown to ASC etc.	Mercy Lett-Charnock	31 st March 2025
Confirm consultation proposals including proposed amount to charge	Consultation and communication plan is fully worked up and signed off.	Mercy Lett-Charnock	31 st March 2025
Carry out public consultation and analyse responses	Outcomes from consultation are recorded and understood and inform final policy for charging	Mercy Lett-Charnock	30 th May 2025
Implement charges	Charges implemented and process for collecting charges put in place.	Mercy Lett-Charnock	30 th June 2025

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Andrew Davies, Head of Commissioning, Contracting and Market Management, Adult Social Care
REVIEWING OFFICER:	
HEAD OF SERVICE / Operational Director:	Rhodri Rowlands, Director Strategic Commissioning and Capacity Building

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Reduction in the contribution for Promoting Independence work to care leavers by 50%, from £160K to £80K annually
DEPARTMENT:	CYP
TEAM:	LAC and Permanency/FPPP
LEAD OFFICER:	Kelli Eboji/Michelle Gwyther
DATE:	2/12/2024

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

SECTION A – INITIAL SCREENING

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

The new Independence Pathway approach piloted in 2023-2024 and introduced in full for 2024-25, aims to prepare young people to reach independence sooner at the age of 19.5 years. This is achieved by providing a structured, targeted and consistent support programme, focussing on upskilling by practice. This is achieved through the increased use of the Gordon Brown Centre (GBC) and utilising local community links who offer new independence programmes and courses.

The Gordon Brown Centre programme costs £160K annually for use of one weekend per month at the centre which provides a full weekend of activity focused on independence for 8 young people. They leave the centre having learnt new independent living skills, including basic DIY like putting up a shelf using DIY tools and an understanding of initial approaches of dealing with issues around the home such as water leaks and electrical issues. Young people also leave with items to assist them with independence, including a basic DIY kit.

The proposed savings in relation to this programme would reduce the capacity of the programme by half which will result in one weekend held every two months.

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

Brent Care Leavers, due to fewer weekend programmes held in the year, which means a reduced provision and availability to choose from.

CYP Personal Advisors, due to less frequent weekend programmes being run by them which could improve work-life balance and wellbeing.

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

Yes, there is relevance in respect to the Council's responsibility to advance equity of opportunity for people belonging to protected groups. While care experience is not yet a legal protected characteristic, the Council has demonstrated commitment to recognising and treating care experience as a protected characteristic – work is underway to determine how this can be embedded within our processes and approaches. The Council noted that Care Leavers experience a range of disadvantages and vulnerabilities as a group because of their adverse childhood experiences and subsequent trauma, and the nature of growing up in the care system. This GBC programme was designed as one way to ensure these young people were leaving care and moving into independent living with the necessary skills, tools and resources, and achieving this independence in a timely way.

14. 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	

15. 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

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

<p>Information and evidence is based on the demographic of care experienced young people, who are already at a disadvantage because of their early childhood and care experiences.</p> <p>As at 10/12/2024 Brent has: 598 Care Leavers allocated 831 Care Leavers entitled to a service</p> <p>187 16-18 year olds eligible for a Leaving Care service 276 19-21 year olds eligible for a Leaving Care service</p>
--

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

AGE

Details of impacts identified	<p>Negative:</p> <p>There could be delays in young people being able to access a GBC weekend away as the frequency will be reducing by half. This could have an impact on the timeliness of young people being presented to Brent Housing Panel and subsequently bidding and then securing their own property.</p>
--------------------------------------	--

DISABILITY

Details of impacts identified	Not applicable
--------------------------------------	----------------

RACE

Details of impacts identified	Care leavers are disproportionately from BAME backgrounds, and so the programme reduction could disproportionately affect young people from these groups.
--------------------------------------	---

SEX

Details of impacts identified	Not applicable
--------------------------------------	----------------

SEXUAL ORIENTATION

Details of impacts identified	Not applicable
--------------------------------------	----------------

PREGANCY AND MATERNITY

Details of impacts identified	Not applicable
--------------------------------------	----------------

RELIGION OR BELIEF

Details of impacts identified	Not applicable
--------------------------------------	----------------

GENDER REASSIGNMENT

Details of impacts identified	Not applicable
--------------------------------------	----------------

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	Not applicable
--------------------------------------	----------------

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

No, none of these impacts could be identified as unlawful under the Equality Act.

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

This has not been discussed with care experienced young people as the proposal is to reduce the frequency of weekends, not cease the programme completely.

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

N/A

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

The justification for the proposed reduction is purely in relation to financial constraints and the need to make cost efficiencies within the financial year.

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

We will continue to monitor the numbers of young people attending GBC weekends in conjunction with the numbers of young people progressing to Brent Housing Panel. This will be to ensure that the impact of this savings is minimised and we are able to continue to progress and support Brent Care Leavers into their own housing in a timely way.

SECTION C - CONCLUSIONS

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

Based on the analysis above and the proposed mitigations, proceeding with this savings proposal is recommended.

There has been 8 GBC weekends in the 2023/2024 financial year and 7 weekends between April 2024 and November 2024.

Annual capacity for this programme in 2025/26 will be 48 young people with the current proposal of 6 weekends per year with a maximum capacity of 8 young people per weekend. This capacity is greater than the total number of participants across both of the previous years.

If our monitoring activity suggests that the council is at risk of spending more money (than the proposed savings) on high cost support accommodation for Care Leavers because they haven't been able to access the GBC weekend in a timely way, we have the option of purchasing additional places on the GBC weekends to increase the total numbers. This spend will be decided on a case by case basis.

SECTION D – RESULT

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

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	x
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.

Action	Expected outcome	Officer	Completion Date
Booking and attendance data to be tracked and reviewed after 6 months to ensure potential negative impacts are being minimised	A clearer understanding of the take-up of the programme, despite reduced weekends.	Kelli Eboji/ Michelle Gwyther	Sept 2025
Additional spaces on the GBC weekends to be considered on a case by case basis and taken to Children's Placement Panel for a decision to fund additional places	Additional funding agreed if required	Allocated Personal Advisor/ worker	When required
Track the number of young people progressing to Housing Panel and being able to progress to bid for housing to ensure numbers are not affected by the reduction in the number of GBC weekends	Panel-related delays are identified and addressed in a timely manner. Management will have the data to decide whether increasing the cohort numbers on individual GBC weekends by four young people, for an additional cost, would be required as well as feasible.	Kelli Eboji/ Michelle Gwyther	Quarterly

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Kelli Eboji, Head of Looked After Children and Permanency Date: 9/1/2025
REVIEWING OFFICER: <i>* the manager with oversight of the project</i>	Michelle Gwyther, Head of Forward Planning, Performance and Partnerships.
HEAD OF SERVICE / Operational Director:	Kelli Eboji, Head of Looked After Children and Permanency Date: 9/1/2025

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Reduction in discretionary spend on the use of taxis and client subsistence payments
DEPARTMENT:	Children and Young People
TEAM:	Forward Planning Performance and Partnerships Looked After Children and Permanency
LEAD OFFICER:	Michelle Gwyther
DATE:	5 December 2024

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

SECTION A – INITIAL SCREENING

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

A reduction in discretionary spend on taxi fares and a reduction in discretionary spend on client payments for care leavers from April 2025.

Discretionary taxi spend

The proposal is a reduction in the use of taxis as a means of transport for children and young people and families, with other alternative means of travel assistance being provided such as bus passes and / or Oyster cards. This will be achieved through tighter decision-making on the use of taxis to support families, and reducing costs spent on transporting children who are subject to care proceedings and looked after children (LAC) and young people to school by taxi, when their school is at a distance from their placement.

Discretionary client subsistence payments.

Care leavers are entitled to up 6 weeks of subsistence payments under the existing Leaving Care Financial Support policy to support the transition to welfare benefits. However, some young people receive payments for more than the 6 weeks due to a number of factors often linked to their individual circumstances. Initial analysis suggests that 2 in 10 young people receive payments for longer than 6 weeks (not including Unaccompanied Asylum Seeker Children (UASC)).

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

Taxi fare proposal (detailed data is not currently available)

Children and young people, including LAC.

Families

Front line social work staff and managers

Foster carers

Subsistence proposal

Care Leavers

18. 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 – the public sector equality duty has been considered, particularly the first two aims, which are most relevant for this proposal: eliminate unlawful discrimination, harassment and victimisation, and advance equality of opportunity.

19. 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		x
Sex			x
Race			x
Disability			x
Sexual orientation			x
Gender reassignment			x
Religion or belief		x	
Pregnancy or maternity			x
Marriage		x	

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

Screening Checklist

	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	x	

Does the policy or proposal relate to an area with known inequalities?	x	
Would the policy or proposal change or remove services used by vulnerable groups of people?	x	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	

If you have answered YES to ANY of the above, then proceed to section B.

If you have answered NO to ALL of the above, then proceed straight to section D.

SECTION B – IMPACTS ANALYSIS

22. Outline what information and evidence have you gathered and considered for this analysis.

If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

Taxi fare proposal

Children (who are able to be transported to school on their own), and young people would be affected by the removal of taxis being used to transporting them to and from school. Their attendance and therefore their studies at school or an alternative provision could be affected which would impact on their educational outcomes. This would also affect Brent Council's attendance and attainment performance, both of which are published.

Families would be affected as they are supported with taxis to take their children to and from school who cannot travel on their own, to enable them to attend significant appointments related to their child's plan including contact, and to travel to and from court when there are court proceedings.

Social workers would be affected by reduced taxi availability. Currently taxis are used to support looked after children and young people especially in times of crisis when a placement has broken down and they need to be transported to a new placement. Taxis are also used by social workers for out of hours and weekend use.

Foster carers would also be affected as on occasions and when necessary, foster carers are supported through the provision of taxis to transport looked after children and young people to and from school.

This equates to around 1100 bookings per year, but these are not 1100 unique bookings and comprises a large number of repeat bookings. The spend by CYP is circa £120,000 per year and this is delivered by approved providers who have been quality assured by the Council.

Subsistence proposal:

- Care leavers are entitled to up 6 weeks of subsistence payments under the existing Leaving Care Financial Support policy to support the transition to welfare benefits. Some young people receive payments for more than 6 weeks as a result of factors linked to their individual circumstances, for example delays in them receiving their first Universal Credit payment.

44 care leavers were paid subsistence between April 2024 and October 2024 for more than 6 weeks. Of these 31 young people were UASC who were overpaid by an average of 20 weeks. 13 non UASC young people received support for an average of 22 weeks.

Resources and evidence that have been looked at to complete this analysis include:

- Equality Act 2010
- Brent Equity, Diversity and Inclusion strategy 2024-28
- Public Sector Equality Duty
- Joseph Rowntree Foundation research and reports.
- Data provided by the Performance and data Team within CYP

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

AGE

<p>Details of impacts identified</p>	<p>Taxi fare proposal</p> <p>Positive: By reducing the provision of taxi fares, a greater level of independence and autonomy is promoted through encouragement of travelling using public transport. It can foster a sense of better freedom whilst building trust between a young person and their families or guardians when the young person is regularly able to demonstrate safe travelling and navigating skills.</p> <p>Negative: Young people may suffer from poor school attendance and as a result of this, poor educational outcomes. With the provision of alternative means to travel to school e.g. a bus pass or oyster card, there may be little incentive for some young people to travel independently to school.</p> <p>Families may not be able to meet requirements in their child’s plan to attend significant appointments which subsequently impacts on the child. If taxis are provided to give an incentive to comply with their child’s plan, the removal of this could result an increase in statutory intervention, for example, children subject to a Child Protection plan coming into care.</p> <p>Social workers use taxis to reach children and young people quickly in terms of crisis, and also to take children and young people to new placements when they move. Delays in reaching a child or young person could add further to trauma they have already experienced.</p> <p>Subsistence proposal:</p> <p>Negative: Some young people could be left without financial support if there are genuine reasons why they are not accessing benefits. This may lead to ad-hoc financial support requests, for example funding for specific purposes (utilities bills) which continues to add financial cost.</p>
---	--

DISABILITY

<p>Details of impacts identified</p>	<p>Taxi Fare Proposal</p> <p>Negative: The proposal to remove taxi assistance could impact on those who experience difficulties, whether physical or learning disabilities, in traveling independently. Those with mobility impairments are more reliant on taxis and local public transport services can often be delayed and have limited capacity to accommodate multiple passengers with mobility needs. Hence private transportation is a quicker and more reliable solution for this cohort. Those with learning disabilities, depending on the severity of them, can find independent travel using public transport to be overwhelming and may require higher levels of guidance to navigate. Families and carers of children and young people will be provided with information regarding other means of support available to them. This may include Brent's Travel Assistance Policy.</p> <p>Brent council policies and strategies such as Equity, Diversity & Inclusion strategy 2024-2028, Equality Policy, Flexible Working policy and Health and Safety Policy will be followed to ensure appropriate and reasonable adjustments will be put in place for all staff with disabilities who are required to travel as part of their role.</p> <p>Subsistence proposal</p> <p>The proposal will impact equally upon all those identified to be impacted regardless of disability. In most cases, care leavers are in receipt of Universal Credit after the 6 weeks but delays do occur. Care Leavers will be encouraged and supported by their Personal Advisor to use tools such as an online Benefits calculator to ensure they are accessing any other welfare support or grants they may be eligible for, for their individual circumstances.</p>
---	---

RACE

<p>Details of impacts identified</p>	<p>The proposal may impact largely negatively on young people, especially from ethnic minority backgrounds. Monthly data on the disproportionalities amongst the Brent CYP population has been looked at, with attention to those on a Child Protection Plan, those who Looked After Children (LAC) and those who are care leavers.</p> <p>The top 3 ethnicity groups identified for each are as follows:</p> <ul style="list-style-type: none"> - Child Protection Plan: Any Other Ethnic Group (23.7%), Any Other Black Background (18.4%) and Any Other Asian Background (12.6%). - LAC: Any Other Ethnic Group (14.3%), Any Other Mixed Background (14.3%), Any Other Black Background (14%). - Care Leavers: Any Other Ethnic Group (29.5%), Any Other Black Background (12.4%), Black African (12%).
---	--

	<p>Comparing this to 2021 Census population data for the 0-25 age group, for reference:</p> <ul style="list-style-type: none"> - 4.6% identified themselves as being from Any Other Ethnic Groups. - 2.98% identified themselves as being from Any Other Black Background. - 3.2% identified themselves as being from Any Other Mixed Background. - 7.95% identified themselves as being from Any Other Asian Background. - 12.3% identified themselves as being from Black African background. <p>Brent CYP has defined Ways of Working which are represented by a multi-fruit tree, where the 'earth' symbolises that we are an anti-racist organisation. This significantly informs how services are delivered, including the changes mentioned through this proposal. It has been considered that the ethnic minority groups mentioned above face greater challenges including school exclusion, crime, gang activity and delinquency and housing and homelessness. Individuals from ethnic minority backgrounds often feel insecure about using public transport due to these issues, which exacerbates disparities with accessing education as well as other community services. Colleagues from Community Safety including the Safety and Travel Planning team will be consulted for their experience in improving and ensuring neighbourhood safety to support schools and social care teams to encourage travel using public transport.</p> <p>Subsistence proposal The proposal will impact equally upon all those identified to be impacted regardless of race. Leaving Care teams will be supporting all young people, regardless of any protected characteristics, to make timely applications for benefits to prevent need for subsistence payments.</p>
--	--

SEX

<p>Details of impacts identified</p>	<p>Negative: Reduction of provision of taxi fares can impact female young people from a safety perspective, especially during winter months when there are fewer daylight hours and there is less incentive to travel independently. Colleagues from Community Safety including the Safety and Travel Planning team will be consulted for their experience in improving and ensuring neighbourhood safety to support schools and social care teams to encourage travel using public transport.</p> <p>Subsistence proposal The proposal will impact equally upon all those identified to be impacted regardless of sex. Leaving Care teams will be supporting all young people, regardless of any protected characteristics to make timely applications for benefits to prevent need for subsistence payments.</p>
---	---

SEXUAL ORIENTATION

Details of impacts identified	<p>Negative: Reduction of provision of taxi fares can impact those who identify themselves from the LGBTQ+ community, particularly if they have previously experienced bullying and harassment, or discrimination either in the public realm or within their families. This can make independent travel using public transport a traumatic and unsafe experience.</p> <p>Subsistence proposal The proposal will impact equally upon all those identified to be impacted regardless of sexual orientation. Leaving Care teams will be supporting all young people, regardless of any protected characteristics to make timely applications for benefits to prevent need for subsistence payments.</p>
--------------------------------------	---

PREGANCY AND MATERNITY

Details of impacts identified	<p>The proposal to remove taxi assistance could impact on those who are pregnant and / or recovering after pregnancy if they are experiencing difficulties during this time with traveling independently.</p> <p>Subsistence proposal The proposal will impact equally upon all those identified to be impacted regardless of pregnancy and maternity. Leaving Care teams will be supporting all young people, regardless of any protected characteristics to make timely applications for benefits to prevent need for subsistence payments.</p>
--------------------------------------	--

RELIGION OR BELIEF

Details of impacts identified	<p>The proposal will impact equally upon all those identified to be impacted regardless of religion or belief.</p>
--------------------------------------	--

GENDER REASSIGNMENT

Details of impacts identified	<p>Negative: Reduction of provision of taxi fares can impact those who identify themselves from the LGBTQ+ community, particularly if they have previously experienced bullying and harassment, or discrimination either in the public realm or within their families. This can make independent travel using public transport a traumatic and unsafe experience.</p> <p>Subsistence proposal The proposal will impact equally upon all those identified to be impacted regardless of gender reassignment. Leaving Care teams will be supporting all young people to make timely applications for benefits to prevent need for subsistence payments.</p>
--------------------------------------	---

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified

The proposal will impact equally upon all those identified to be impacted regardless of marriage and civil partnership.

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

No

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

No engagement initiatives with people affected by this proposal have been undertaken as the proposal was not a public one. Heads of Service who lead teams directly affected by the proposals have been informed about the proposal and have provided some early feedback which has been taken into consideration in how the proposals will be implemented. It is recognised detailed communication and engagement will be required with frontline staff working with families and young people who will be affected.

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

A data analysis was completed to identify numbers for the initial proposal to inform the levels of savings to be proposed. This analysis is being further analysed to break it down into different groups of users and volume of spend to enable effective tracking systems of impact and outcomes.

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

The primary reason for any negative impacts that may remain are a result of financial constraints faced by the Department hence savings are to be considered wherever possible within this financial year.

Mitigating factor:

Across all of the protected characteristics set out above, there could be a one off or an individual circumstance where due to safeguarding reasons and/or safety, travel assistance in the form of a taxi will need to be provided. It is not possible to set out every single possible scenario where this could happen, but for example if an individual is experiencing domestic abuse or risk of physical harm and needs to remove themselves from the situation, assistance in the form of a taxi will be supplied. This case-by-case will be a principle in the implementation of this savings proposal.

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

The detailed analysis will set a benchmark for the number of current users and provide an increased understanding of which specific groups are in greater need. Equality impacts will

be tracked through direct feedback received from service users, where the proposal has negatively impact on them, feedback from frontline professionals and schools and colleges. Each individual impact will be logged so negative impacts can be tracked and any amendments made to implemented actions.

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.

Taxi fare proposal

There is no statutory duty to provide travel assistance in the form of a taxi to families or children and young people. However, the provision of travel assistance supports families in addressing individual needs and could enable children and young people to step down from statutory children's services in a timelier way.

Subsistence proposal:

As their corporate parent, Brent Council has a duty to financially support young people if they have no other income from either employment or claiming benefits. The entitlements for young people are set out in the Brent 'Leaving Care Financial Procedures' which is being refreshed this financial year.

SECTION D – RESULT

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

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	X
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.

Action	Expected outcome	Officer	Completion Date
Complete detailed analysis of user data and spend	Clear picture of activity and volume of spend to provide a clear baseline for monitoring impact and provide an increased understanding of which specific groups are in greater need.	Marie Molisho	20 December 2024
Review and update the discretionary spend policy and share with relevant stakeholders for their agreement	<p>Updated discretionary spend policy with clear thresholds for travel assistance which is agreed and owned by all relevant stakeholders, taking into consideration the needs of specific groups.</p> <p>Updated discretionary spend policy that includes a clear exceptions policy and process for when any payments need to be for longer than 6 weeks, taking into consideration the needs of specific groups.</p>	Marie Molisho and Michelle Gwyther	17 January 2025
Negotiation with taxi companies on block arrangements including the calculation of no shows	Prevented disruption and distress for vulnerable CYP.		28 February 2025
New policy implemented	Clearer understanding amongst staff of the process to be followed when processing applications, especially for exceptional cases.	Marie Molisho and Michelle Gwyther	April 2025 –

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Marie Molisho, Business Support and Income Generation Manager
-----------------	---

REVIEWING OFFICER: <i>* the manager with oversight of the project</i>	Michelle Gwyther, Head of Forward Planning, Performance and Partnerships
HEAD OF SERVICE / Operational Director:	Shirley Parks, Director, Education, Partnerships and Strategy

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Safe Base
DEPARTMENT:	Children & Young People
TEAM:	Education Psychology, Care leavers, Virtual School
LEAD OFFICER:	Michaela Richards
DATE:	December 2024

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

SECTION A – INITIAL SCREENING

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

The proposal/change is to cease the Safe Base Brent offer, which is a Mental Health and Wellbeing support service for care leavers attending higher education. This would make a budget saving in the Brent Virtual School and Educational Psychology Service.

The Safe Base service is a mental health and wellbeing support service for Brent Care Leavers up to the age of 25 in higher education/apprenticeships. The highest percentage of service users are those attending university. The service is relatively longstanding (6 years) and around 25 young people access support each year.

Young Minds, Kooth and Free Your Mind offer similar free support programmes and university, or college students would also have access to in-house mental health and wellbeing programmes within their places of study.

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

Young people who currently access the service, this is approximately 25 users of the service.

23. 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, the proposed change is relevant to the Public Sector Equality Duty, and the requirement that the Council has due regard to the need to eliminate discrimination, harassment, and victimisation, and advance equality of opportunity between people who share a relevant protected characteristic and those who don't. Furthermore, the Council is in the process of formally adding care experience as a protected characteristic.

24. 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	

25. 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

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

Safe base is a valued resource that has a small clientele base. A report published in January 2022 stated that from the services inception (April 2018) to date (January 2022) there had been 82 potential candidates with 51 full referrals being made. Whilst all 51 were offered an initial phone consultation, it is not clear how many took up this offer and how many continued

on to receive ongoing support. Whilst the impact is positive for those young people who engage it is also clear that the reach of the service is small. More recent data indicates that an average of 25 young people access the service each year.

Research into other services with the same profile was conducted and the following services were identified as they are national services:

- <https://www.youngminds.org.uk/>
- <https://www.kooth.com/>

Both services offer online and telephone sessions in the same way as Safe base, in addition to these services there are also region-specific services that can be accessed based on the care leavers location such as <https://www.freeyourmindcic.com/> and <https://www.justtalkherts.org/just-talk-herts.aspx>. Most users of Safe Base are young people at university. A number of students attend Brunel University so a check was completed to ascertain what mental health support they offered and the following was identified: <https://students.brunel.ac.uk/support/mental-wellbeing-services>. A cursory check was made of five other universities and all had a similar offer to Brunel.

Given the above it was felt that the mental health support offered by Safe Base was also offered by other services at national, regional and local (university) level.

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

AGE

Details of impacts identified	This is an age specific service for young people in higher education. The age group of service users may face unique challenges in higher education, and removing this targeted support could exacerbate inequalities.
--------------------------------------	--

DISABILITY

Details of impacts identified	The service provides mental health support and removing it could disproportionately impact care leavers who need support in this regard.
--------------------------------------	--

RACE

Details of impacts identified	Care leavers are disproportionately from BAME backgrounds, and so service closure could disproportionately affect young people from these groups. However, even though care leavers are disproportionately from these backgrounds it does not mean that young people from these backgrounds are accessing the service more than others.
--------------------------------------	---

SEX

Details of impacts identified	Not applicable
--------------------------------------	----------------

SEXUAL ORIENTATION

Details of impacts identified	Not applicable
--------------------------------------	----------------

PREGANCY AND MATERNITY

Details of impacts identified	Not applicable
--------------------------------------	----------------

RELIGION OR BELIEF

Details of impacts identified	Not applicable
--------------------------------------	----------------

GENDER REASSIGNMENT

Details of impacts identified	Not applicable
--------------------------------------	----------------

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	Not applicable
--------------------------------------	----------------

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

No

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

No and further engagement is not required to continue with this proposal.

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

N/A

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

There is a risk that the mental health and wellbeing of some young people deteriorates if they did not access other free social emotional and mental health and wellbeing support programmes. To mitigate this, information will be shared with care leavers on the range of free services available nationally and locally that they could access instead of Safe Space, including Young Minds, Kooth and Free Your Mind. Users at university or college would also have access to their educational institutions' own student wellbeing programmes.

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

All young people who are current users of the service have an allocated PA who will be in place to recognise any concerns that arise from the closure of the service. These will be reported up through the care leavers service and shared across the relevant Service Managers and Heads of Service.

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.

There are negative equality impacts based on the above analysis. However these are justified due to the impacts analysis in section B. To mitigate against the risk of negative mental health impacts as a result of service closure, the following mitigation activities are planned:

- Phased reduction to service.
- Signposting for current and potential users.
- Liaising with universities that users attend to ensure that there is a continuity of support.

The services offered are not statutory and there are other similar services that the current users are able to access.

SECTION D – RESULT

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

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	X
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.

Action	Expected outcome	Officer	Completion Date
Discussion with team manager with regards to service removal and proposal for phased reduction of service until April 2025.	Key personnel understand the next steps and are able to work with young people to implement the plan and mitigate any negative repercussions.	Michaela Richards Frank Glennon	August 2024
Reduce service from three days to two days. Staff member to identify alternative services and programmes and signpost new users. Ensure that all referees are aware of the reduction and eventual removal of service	Phased reduction that will allow for the service to more naturally end rather than an abrupt end at the end of the financial year.	Frank Glennon	December 2024
Reduce service down to one day and completion of work with current users.	Continuation of the phased reduction of service, able to ensure that those who need are introduced to other services.		February 2025
Service Closure			March 2025

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Michaela Richards
REVIEWING OFFICER: <i>* the manager with oversight of the project</i>	Michaela Richards
HEAD OF SERVICE / Operational Director:	Shirley Parks

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	To increase Council Tax by 4.99% in 2025/26
DEPARTMENT:	Council wide
TEAM:	N/A
LEAD OFFICER:	N/A
DATE:	29 November 2024

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

SECTION A – INITIAL SCREENING

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

The council is required to make significant savings in order to deliver a legally required balanced budget. In order to help overcome this it is proposed to increase council tax by 4.99%, where 2% is ring fenced for Adult Social Care and 2.99% is a general increase. This is the maximum increase allowed by government. The proposal will generate an additional £8.1m of recurring income for the Council and therefore avoid having to make further savings to key council services such as adult social care, children’s services, etc.

This will impact all residents within Brent who are eligible to pay council tax. Under the changes that are being made to local government funding, there is more emphasis on generating more funding locally (i.e.becoming more self-determinant). This proposal is linked to one aspect of local government funding where the Council has some discretion to raise additional funds by increases to council tax.

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

All households in Brent, apart from those who are of state pension age; these households are eligible for 100% council tax discount, however, the discount is only applied following financial assessment of their income.

The increase by band and the number of properties affected are shown below.

Band	Amount payable in 2024/25 (Brent share)	Amount payable in 2025/26 (Brent share)	Increase per annum	Increase per month	Increase per week	Total number of dwellings affected
A	£1,043.10	£1,095.18	£52.08	£4.34	£1.00	6,081
B	£1,216.95	£1,277.71	£60.76	£5.06	£1.17	14,033
C	£1,390.80	£1,460.24	£69.44	£5.79	£1.34	41,661
D	£1,564.65	£1,642.77	£78.12	£6.51	£1.50	39,226
E	£1,912.35	£2,007.83	£95.48	£7.96	£1.84	23,403
F	£2,260.05	£2,372.89	£112.84	£9.40	£2.17	6,563
G	£2,607.75	£2,737.95	£130.20	£10.85	£2.50	3,452
H	£3,129.30	£3,285.54	£156.24	£13.02	£3.00	252

If this proposal is approved, it will affect all households in Brent's 134,671 residential dwellings, that will see their council tax bills increase, unless they are eligible for council tax support. The proposed changes to the council tax support scheme (CTS) for 2025/26 has a separate equalities assessment to determine it's impact. However, a point to be noted is that the 4.99% increase and proposed changes to the CTS scheme could have a cumulative financial impact on some households.

28. 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. This proposal will have both positive and negative impacts on residents and will potentially affect groups with protected characteristics. However, since the council tax is applicable to all properties, it is not considered that the increase targets any one particular group rather it is an increase that is applied across the board. At the same time because the increase is applied to all properties it is not possible to exempt any particular groups. However, on the latter point there is a council tax support scheme that offers support to vulnerable people and people on low incomes for both pensioners and those of working age. The proposed changes to the CTS scheme will result in significant changes in the eligibility criteria and as a result some households may no longer qualify for council tax support. However, the Brent Resident Support Fund (RSF) and Hardship Fund could provide further assistance to vulnerable residents, including but not limited to help with the cost of their council tax bill.

29. 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	

30. 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

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

The Council has analysed the statutory council tax base return which shows the total number of households that are required to pay council tax and the households who are eligible for council tax support.

Other than this, it is not possible to conduct further impact analyses as the proposed council tax increase will affect households in Brent in different ways based on their financial

circumstances. However, low income households will continue to be eligible to apply for council tax support to offset this increase.

The council tax support scheme is also proposed to be amended from 2025/26, subject to a separate consultation process and Equality Analysis.

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

AGE

Details of impacts identified	N/A
--------------------------------------	-----

DISABILITY

Details of impacts identified	N/A
--------------------------------------	-----

RACE

Details of impacts identified	N/A
--------------------------------------	-----

SEX

Details of impacts identified	N/A
--------------------------------------	-----

SEXUAL ORIENTATION

Details of impacts identified	N/A
--------------------------------------	-----

PREGANCY AND MATERNITY

Details of impacts identified	N/A
--------------------------------------	-----

RELIGION OR BELIEF

Details of impacts identified	N/A
--------------------------------------	-----

GENDER REASSIGNMENT

Details of impacts identified	N/A
--------------------------------------	-----

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	N/A
--------------------------------------	-----

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

No, the impacts identified in this EIA are not unlawful under the Equality Act, as the changes apply universally and are not explicitly targeted at any specific group.

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

Yes, significant engagement / consultation is planned between December 2024 and February 2025 ahead of the decision being made by full council on 27 February 2025.

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

None required

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

If the proposal is rejected, the Adult Social Care budget will not grow by £3.2m, which could pose challenges to the service to meet growing demand of current and future service users. Failure to meet the increasing demand and diverse needs of current and future service users, would have a negative impact on those most at need. It will also likely lead to increased crisis costs and further impact upon budget pressures.

The 2.99% increase in council tax for general use should have a positive impact on some equality groups as it prevents an additional reduction of £4.9m in the Council's budget. Without a specific alternative proposal, the exact benefit to specific groups of residents, staff and external stakeholders is uncertain, but a reduction in budget at short notice will limit the scope of the Council to reduce the impact on services used by vulnerable groups of people.

Whilst the council tax proposal will increase the financial pressure on some households, the council tax support scheme will partially or fully mitigate this impact for those households who are living on low incomes and are eligible for council tax support. The council tax support scheme is also proposed to be amended from 2025/26, subject to a separate consultation process and Equality Analysis. If the revised CTS scheme is approved, this could result in significant changes in the eligibility criteria for claimants and some households may no longer qualify for council tax support.

Some residents who live on their own or no one else in the property counts as an adult, will have the impact mitigated by the 25% discount offered to single households.

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

If the council tax proposal is approved, the Council will continue to monitor the impact on equality groups to ensure that any unexpected consequences and/or adverse impact are promptly identified and mitigated. This will take place when the new council tax support scheme is implemented.

The existing powers under Section 13A of the Local Government Act 1992 allow the Council to reduce council tax by up to 100%. The process for applying is detailed on the Council's website. The council plans to increase the funding available for 13A reductions to £1.5m. Applications will be online and managed alongside the Resident Support Fund. A revised policy relating to 13A will be presented to Cabinet in March 2025 for consideration ensuring the funding is targeted at those affected.

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.

It is proposed to continue with the proposal. The reason for this is that the council tax increase will help to protect front line services, reduce the amount of savings required and provide much needed additional growth for the Adult Social Care budget. The council tax increase proposed is equivalent to approximately £8.1m of additional funding. If this funding was not available, services such as Adult Social Care and Children's Social Care would have to be significantly reduced.

Brent has processes in place for applying a council tax support/reduction/exemption to those eligible, therefore whilst this increase will impact across the board, it is anticipated that the impact will be proportionate dependent on an individual's circumstances and whether they receive a council tax support/reduction/exemption.

Some residents will be additionally impacted by the proposed changes to the Council Tax Support Scheme. The impact of these changes on residents with protected characteristics will be considered in a separate Equality Analysis as part of the decision making process.

SECTION D – RESULT

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

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	
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.

Action	Expected outcome	Officer	Completion Date
Review impact of council tax increase, with a particular focus on understanding the ability to pay of those in arrears by utilising credit reference agencies, monitoring payment patterns and any other information available.	Better understanding of negative impacts so that support and recovery action can be appropriately targeted.	Peter Cosgrove	April – June 2025

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Peter Cosgrove
REVIEWING OFFICER: <i>* the manager with oversight of the project</i>	Ravinder Jassar

**HEAD OF SERVICE
/ Operational
Director:**

Thomas Cattermole

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	New Council Tax Support Scheme
DEPARTMENT:	Household Services
TEAM:	Customer Services & Assessments
LEAD OFFICER:	Sunita Ghudial
DATE:	07 January 2025

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

SECTION A – INITIAL SCREENING

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

The Council is obliged to set a local Council Tax Support Scheme every year following the abolition of the national Council Tax Benefit Scheme in 2013. The Council introduced a local Council Tax Support (CTS) Scheme to provide financial assistance for working-age households in paying their Council Tax. Council Tax Support is awarded as a reduction on a council taxpayers' bills, like a discount, so the household pays less. The scheme has two parts a statutory scheme for pensioners and a non-statutory scheme that covers the working age population. These proposals impact only on the non-statutory elements of the scheme and do not affect the statutory scheme for pensioners.

Anyone who is liable for council tax (tenants and homeowners) can apply for council tax support.

The current local Council Tax Support scheme has been in place since April 2020. It is proposed to introduce a new scheme from 2025/26.

Council Tax Support (CTS) is a local scheme determined by the Council which provides assistance with Council Tax liabilities to households on low incomes. The objectives of the review are: -

- To maintain a scheme which is fair and simple to understand.
- To further align the scheme with Universal Credit and ensure the scheme is fit for future needs.
- To address any elements of the current scheme which are unsustainable or undesirable.
- To streamline administrative processes and reduce complexity for claimants.

Brent faces a significant challenge setting the budget for 2025/26 with a budget gap of c£16m, rising to c£30m by 2027/28. This is to be addressed through identifying further savings, efficiencies, and income generation options.

The changes being proposed will provide an option for Cabinet in addressing this budget gap. If the amendments to the Council Tax Support scheme are not approved by Full Council, the budget for 2025/26 will not be a legally balanced budget and will therefore propose to use

£5m of reserves to cover the budget shortfall in 2025/26. As reserves can only be used once, £5m will have to be added to the budget gap in the Medium Term Financial Strategy and 2026/27 budget setting process

Other reasons for the proposed changes to the scheme are:

- In the current scheme the income bands have remained static and not changed with CPI growth. The new proposed scheme will increase income bands and non dependant income is in line with the increased CPI ensuring households do not fall out of support
- The new proposed scheme ensures that households liable for Council tax and are on Universal Credit- the notification date from DWP is used to make the CTS award, ensuring households do not lose on entitlement. During 2025/26, additional working age households will be transferred to Universal Credit (UC). There is an opportunity to simplify the administration of the CTS scheme.

The costs of providing CTS under the current working age scheme is forecast to be £19.9m in 2024/25 rising to £21.2m in 2025/26. The proposed scheme options would be expected to reduce this by £8m, which would deliver savings of £5m. The remaining £3m will be utilised for a hardship fund of £1.5m and £1.5m to make a mandatory contribution to the Greater London Authority through the Mayor of London for their precept for 2025/26.

As well as proposals to make changes to the CTS scheme, the Council is also proposing to continue to use its policy under section 13A of the Local Government Finance Act 1992 to further support households with their council tax bills. The Council will use its current mechanism of Households Support fund for households to apply for support with their council tax. Vulnerable groups will be identified using our data sets on Housing Benefits and Council tax support. The Council will work closely with external and internal stakeholders to provide holistic services with income maximisation and debt advice. The council could further refine and promote available support options for residents struggling with council tax bills

Pensioners will be unaffected by this change as their CTS will be calculated as prescribed by legislation. Pensioners will continue to receive full Council tax Support up to 100% of their council tax liability depending on their personal circumstances. Pension age is currently set at is 66 years.

The Council is considering changing the CTS scheme, for 'working age' claimants as the current scheme has become unaffordable in the current economic climate.

2025/26 proposal

The proposed changes to the CTS scheme, for 'working age' claimants is set out in option 2 below.

Option 1

No changes are made to the existing CTS scheme. If this is the preferred option, members will need to identify £5m of savings elsewhere within the Council's budget. This may have a detrimental impact on other services given the significant savings that are already planned.

If the amendments to the Council Tax Support scheme are not approved by Full Council, the budget for 2025/26 will not be a legally balanced budget and will therefore the proposal will be to use £5m of reserves to cover the budget shortfall in 2025/26. As reserves can only be

used once, £5m will have to be added to the budget gap in the Medium Term Financial Strategy and 2026/27 budget setting process.

Option 2

- Introduce a standard 35% minimum payment for working age households and apply a percentage reduction to each of the income bands. This means all CTS claimants will be expected to contribute a minimum of 35% towards their Council Tax liability. Their CTS will then be calculated based on their income and this will determine which income band they fall into.
- Simplify the non-dependant charges and have just two flat rate non-dependant deductions for most households with other adults living in the property, £8 per week for non-dependants “out of work” and £20 per week for non-dependants “in work”. This would remove the need to verify income for non-dependants for CTS claims and reduce the administration burden.

Proposed Technical Administrative Changes

- Backdating will be restricted to 1 month.
- Accept Universal Credit notification from DWP as start date of claim for CTS.
- To increase/decrease the income bands in line with Consumer Pricing Index (CPI) from September of previous year.
- To increase/decrease the non-dependant charges in line with CPI from September of previous year.
- Review the section 13A policy for hardship fund for Council tax.

Other options that were taken into consideration that were not viable were:

- Minimum CTS award ranging from 20% to 65%.
- Maximum CTS to be capped to Band D
- Change the income bands.
- Apply a cap on a minimum award of CTS of £2/£5 per week.

The above options for various reasons were not viable as it would not give us the necessary savings needed, administratively wouldn't be efficient and households impacted by the proposed changes would be significantly higher.

The proposals were subject to an 8-week public consultation which ran from 21 October to 15 December 2024, details around the findings are captured in section B and separately as part of the consultation findings that report that will accompany the new Council Tax Support Scheme proposal pack. Following public consultation, a decision on the Council Tax Support Scheme for 2025/26 will be made in March 2025 by Cabinet and Council.

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

Total population of Council Tax Support Scheme claimants

As at 2024/25 there were 135,000 properties within the borough with a Council Tax liability. At that time, Brent had 25,692 households receiving CTS, showing that 19.03% of total taxpayers receive Council Tax Support.

Of the 25,692 households receiving CTS, the breakdown of impacted groups is as follows: 8428 pensioners and 16,833 are working age. This information is provided in greater detail below:

Breakdown of current CTS scheme customer profile			
Type of customer	Number	Yearly (£)	% of Total
Pensioner Scheme			
Pensioner	8428	£12,901,452.70	39.29%
Working-Age Scheme (Employed)			
Single Person No Dependants	2996	£3,018,733.87	9.19%
Lone Parents	2472	£2,241,297.48	6.83%
Couples with no Dependants	488	£582,135.86	1.77%
Couples with Dependants	2039	£1,926,144.02	5.87%
Working-Age Scheme (Not employed)			
Single Person No Dependants	5413	£6,963,607.76	21.21%
Lone Parents	2308	£3,288,646.65	10.02%
Couples with no Dependants	436	£689,629.31	2.10%
Couples with Dependants	681	£1,222,023.06	3.72%
Total	25,692	£32,833,670.71	100%

Breakdown of working age CTS Scheme customer profile by age

Age of Customer	Number	% of Total
------------------------	---------------	-------------------

18 to 25	490	2.91%
26 to 35	2531	15.04%
36 to 45	4144	24.62%
46 to 55	4701	27.93%
56+	4967	29.51%
Total	16833	100%

Breakdown of working age CTS scheme customer by gender		
Gender of Customer	Number	% of Total
Female	9416	55.94%
Male	7195	42.74%
Unknown	222	1.32%
Total	16833	100%

<u>Breakdown of working age CTS scheme customer by ethnicity</u>		
<u>Ethnicity</u>	<u>Number</u>	<u>% of Total</u>
White	2272	32.45%
Black or Black British	2067	29.52%
Asian or Asian British	1225	17.50%
Arab	762	10.88%
Mixed Background	430	6.14%
Any Other Ethnicity	205	2.92%
Prefer not to say	41	0.59%

Note: The ethnicity data above is based on 42% of the CTS application having provided their ethnicity data. 58% of the application was unknown.

Breakdown of working age CTS scheme customer by disability		
	Number	% of Total
Not in receipt of disability benefit	10056	59.74%
In receipt of disability benefit	6777	40.26%
Total	16833	100%

Pensioner Households

Pensioners (of state pensionable age 66 and above) will not be impacted by the proposed changes. Pensioners remain protected as CTS is still controlled nationally for this age group

and can cover up to 100% of their CTS bill depending on the circumstances of the household. Therefore, there will be no impact on pensioners, or their council tax support awards and this group has not been considered as part of this equality impact assessment.

33. 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. This proposal will have a negative impact on all groups with protected characteristics and a disproportionate impact cannot be ruled out completely. Most CTS claimants are female, indicating a potential disproportionate effect by gender. People between the ages of 46 and 66 make up most claimants, indicating this age group are also more likely to experience a disproportionate impact. Several mitigation actions have been addressed below as part of the consultation feedback.

Although socio-economic status is not a protected characteristic, most claimants in receipt of working-age council tax support under the current scheme fall into the lowest income category and receive the highest level of support. As a result, lower income households are likely to be more negatively impacted by the change, and there may be a disproportionate socioeconomic implication to consider.

34. 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

35. 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

43. 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 current scheme pays CTS entitlement based on income brackets & non-dependant deductions. Under the current scheme, claimants; in some circumstances, can receive up to a 100% reduction on their Council Tax bill. Detailed equalities analyses have been made for the current scheme and found that the scheme impacts are in general spread evenly across protected and non-protected groups.

Currently, claimants must provide information around their age, gender, and disability status as this is requirement for processing claims. There are also optional fields for claimants to share their ethnicity/race. Hence, we have robust quantitative insights around these characteristics and not others.

To ensure we capture all characteristics, we will be changing our application form to ensure these are included.

Under the scheme's current design, a large number of claimants in receipt of working-age council tax support fall under the lowest income category and receive the highest amounts of support. Consequently, this is the group or income bracket where a significant proportion of the savings are required to be derived from. Therefore, whilst the intention remains that the impacts of this change are not disproportionately felt by any particular group there may be a disproportionate socioeconomic implication to consider due to lower income households being more negatively impacted by the change.

It is worth noting that there are also several statutory requirements that all local CTS schemes must be able to demonstrate (e.g. that they "incentivise work").

Once again, the intention is that impacts are not disproportionately felt by any group. This analysis considers the impacts of the proposed new scheme on groups of claimants with protected characteristics and discusses the policy intentions behind the scheme design

which may have resulted in these impacts, within the main part of the report and in its Conclusion.

There are two key changes as part of the proposed new scheme: -

1. All CTS claimants will be expected to contribute a minimum of 35% towards their Council Tax liability. Their Council Tax Support award will then be calculated based on their income and which band they fall into. All income band award percentages would be reduced as per table below:

Income per week between	Current Scheme	Proposed
£0-£80	100%	65%
£80-£110	80%	50%
£110-£150	50%	30%
£150-£250	30%	20%
£250+	0%	0%

2. A non-dependant deduction is an amount of money taken from Council Tax Support entitlement because there is a non-dependant adult living in the household. A non-dependant is someone aged 18 and over who normally lives within the household such as an adult daughter, son, relative or friend.

Non-dependant charges would be simplified to have either an £8 or £20 non-dependant charge based on whether non-dependant is in work or out of work as per the tables below.

These charges reflect the expectation that non-dependants contribute to the household expenses, including the council tax.

Current Scheme

<i>Non-dependent's income</i>	<i>Deduction per week</i>
Not working	£5
Working (includes Carer's Allowance income) - income up to £150 per week	£10
Working - income between £150 and £200 per week	£15
Working - income over £200 per week	£20

Proposed Scheme

Explanation	Proposed Non-Dependant Charge
Not In Work	£8
In Work	£20

Our current non dependant breakdown shows 2806 non dependants are not working and 1328 non dependants are working.

Consultation

The consultation outcome report has been published separately comprised of a more comprehensive set of findings. Key components emerging from the report are captured below.

A wide variety of methods were used as part of the Consultation process with the aim of ensuring the approach was inclusive of all groups including those claimants and non-claimants of CTS.

Overall, there were 397 responses to the consultation of which 176 were currently in receipt of CTS. Although the number of responses was low in comparison with the volume of communications that were issued, this appears to be above the national response level experienced by the majority of Councils who have consulted since the introduction of CTS and is also a higher level than when the last CTS consultation was undertaken in 2019 when only 194 were received.

In relation to high level information around the characteristics of the respondents (see more detail in the full report):

- Age: most respondents were aged 31-40 (24.9%), 41-50 (24.9%), 51-60 (22.6%), 60+ (14.2%).
- Sex: Female (50.4%); Male (38.3%).
- Ethnicity: White British (23.2%), prefer not to say (20.3%), Asian/ / Asian British / Indian (12.3%), White European (9.2%), Black / Black British / African (7.7.%), Black / Black British / Caribbean (7.5%).
- Religion: Christian (25.9%), prefer not to say (25.2%), no religion (23.7%), Muslim (13.1%), Hindu (7.4%).
- Sexual orientation: Heterosexual / straight (67.9%), prefer not to say (24.5%).

The Council followed best practice guidelines by undertaking an 8-week public and stakeholder consultation, between 21 October 2024 and 15 December 2024. Consultation activities included: -

- Questionnaire on Council website promoted via email and letter to all claimants, and all other households.
- Direct engagement by email and letter with Brent Hub partners and CAB with offer to attend dedicated meetings with each organisation.
- Direct engagement by email and letter with partners with offer to attend dedicated meetings with each organisation.
- Direct engagement with the Greater London Authority, Citizens Advice, Disability Forum, and Community event with Adult Social Care
- Drop-in sessions (in all 6 Libraries across the borough)

- Banners in Customer Service Centre, Libraries and at all events.
- Leaflets with consultation link and barcode to respond to consultation.
- Help to complete consultation available at all public buildings e.g. Customer Service Centre, Hubs, Turning point.
- Stakeholder forums to obtain feedback and input from voluntary sector and community organisations.
- Mailbox set up for CTS-related comments and queries.
- Promoting consultation via auto reply message for Council Tax & CTS emails
- Direct engagement by attend Brent Connect meetings.
- Consultation published in the voluntary sector newsletter.
- Face to face engagement in the Customer Service Centre
- Staff engagement

Appendix A captures the impact of the proposed scheme changes by equality characteristics. This has been further broken down into households with and without a non-dependant. This is to demonstrate the varying impact on those households affected by one or both of the proposed scheme changes.

Socio-economic deprivation

As socio-economic deprivation is not captured in section B.2 this provides a brief outline of implications around this characteristic.

The Equality Act 2010 includes a socio-economic duty (section 1) which states that certain public bodies, when making strategic decisions, must consider how their decisions might help to reduce the inequalities associated with socio-economic disadvantage. However, the UK Government has not implemented Section 1 in England and the duty remains non-binding in England.

Council Tax Support in the main is targeted at households that are financially disadvantaged to support the payment of Council Tax and therefore any change to this scheme is expected to have a negative impact on households that are socio-economically disadvantaged.

In relation to the consultation, respondents who claim benefits were significantly less likely to agree with the proposals than respondents who do not claim benefits. Across all six proposals, respondents who claim benefits were more likely to disagree (than agree) that the Council should implement the change.

When asked to identify the potential negative impact on their households, respondents raised concerns that increases in the amount of council tax due would exacerbate existing financial strains, result in heightened debt, increased poverty, and compromises in meeting essential needs, and negatively impact on overall quality of life and mental health. Respondents also raised concerns about the inability to pay council tax without sacrificing other necessities such as food and heating.

There is also a discretionary element to the proposed scheme, whereby the Council Taxpayer's liability may be reduced further if they are experiencing exceptional hardship or are impacted by extraordinary circumstances.

These reductions are made under Section 13A(1)(a) and (2) of the Local Government Finance Act 1992 (the 1992 Act) to:

- a) A person whom the authority considers to be in financial need,

b) Or persons in classes consisting of persons whom the authority considers to be, in general, in financial need.

44. 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>The proposed change will impact negatively on working age CTS claimants. However, based on the findings from other London authorities who have implemented the same or higher reductions, we do not anticipate the impact to be significant.</p> <p>This proposal would mean working age claimants would have an estimated additional £9.15 on average per week to pay in Council tax.</p> <p>However, within the scope of the 2025/26 scheme, there is a Council Tax Discretionary policy to enable the Council to consider cases of hardship which will help mitigate any negative impacts. The assessment will be similar to the Resident Support Fund discretionary award looking at households circumstances e.g. flood, fire, terminal illness, financial support through Credit Union, debt advice and income maximisation.</p> <p>Evidence: At present approximately 66.64% of Council Tax Support claimants are working age and 33.36% are pension age.</p> <p>For comparison, the working age population (18 – 66 years) in Brent is approximately 86.83% and the pension age population (67 and over) is 13.17%.</p> <p>The proposed changes mean that all working age CTS claimants for the purposes of the scheme will have to pay at least 35% towards their Council Tax.</p> <p><u>Pensioners</u> (those at state pension age)</p> <p>Pensioners are a protected group (prescribed by central government) for the purposes of the council tax support scheme so will not be financially affected; all changes in CTS entitlement affect only working age claimants.</p> <p><u>Working age</u></p> <p>The data shows that those claimants aged 56 or above (29.51%) are more likely to be affected by the proposals compared to those aged 18 to 25 and 26 to 35 (2.91% and 15.04% respectively).</p>
---	--

When compared to the total borough working age population aged 56 or above (14.49%), the number is almost double for those in receipt of CTS (29.51%). This proposal is therefore more likely to have an impact on this group.

DISABILITY

Details of impacts identified

If the proposals are approved, disabled people who are of working age will also be negatively affected. This is because they are disproportionately represented amongst working age claimants who receive a reduction in Council Tax support.

Support is also in place through the Council Tax Discretionary policy for those who suffer hardship because of these proposals in order to mitigate any negative impacts.

Pension age Council Tax Support claimants are not affected by these proposals.

It is worth noting that 774 households who have adaptations made to their property receive disabled relief for their Council tax. This means their Council tax band is reduced by a band e.g. someone is Band D, who receives a disabled relief has their liability reduced to Band C.

Evidence:

In terms of Council Tax Support, disabled claimants are defined as people who receive Personal Independence Payment, Disability living allowance, Attendance Allowance or Universal Credit- Health allowance.

The data shows that 44.96% of CTS scheme working age claimants are in receipt of disability related benefits and will be directly affected by the proposals.

The Council recognises the barriers disabled people face and seek to address them by disregarding Disability Living Allowance, Universal Credit Health allowance awards, and Attendance Allowance in the calculation of Council Tax Support. This often increases the amount of Council Tax Support a disabled person is entitled to.

Currently, there are premiums for severe disability, enhanced disability, and a disabled child rate. Such premiums are granted when Housing Benefits applicants receive a relevant disability related benefit granted and administered by the Department for Work & Pensions.

Disabled people who are unable to work receive higher levels of state benefits and while based on the proposals they will be subject to the 35% liability reduction, disabled working age claimants are likely to have a higher income than other unemployed, working age claimants whose council tax support will also be reduced.

RACE

<p>Details of impacts identified</p>	<p>Our data shows that BAME claimants are slightly over-represented amongst working age claimants receiving Council Tax Support. There could be a negative impact of the proposals on people from Black, Asian, and Minority Ethnic (BAME) groups.</p> <p>Support is in place through the Council Tax Discretionary policy for those who suffer hardship because of these proposals in order to mitigate any negative impacts.</p> <p>Evidence: The table above (see point 2) shows the figures for the breakdown of Brent by ethnicity/race and for Benefits claimants where they have supplied this information.</p> <p>The data indicates that the largest ethnic group of claimants for CTS are White at 25.07% which is below the total White borough working age population of 34.6%. BME people make up 51.75% of claimants which is below the total BME borough working age population of 65.4%.</p> <p>As data is unavailable for 58% of claimants and the race breakdown is not provided, it is not possible to analyse the impact with any statistical significance.</p>
---	---

SEX

<p>Details of impacts identified</p>	<p>Due to the fact that only one claim is submitted per household, it is difficult to fully consider the implications the proposals will have on this protected characteristic.</p> <p>However, equalities monitoring indicates that a higher percentage of claims (55.94%) are made by females (married and single titles) compared with males. We also know that lone parents, part-time workers, and carers are more likely to be women. According to our working-age Council Tax Support data women make up 94.33% of lone parents in receipt of Council Tax Support.</p> <p>The proposals are therefore considered to have a disproportionate impact on women.</p> <p>Support is in place through the Council Tax Discretionary policy for those who suffer hardship because of these proposals in order to mitigate any negative impacts.</p> <p>Evidence: The table above (see point 2) shows the figures for the breakdown of Brent by gender where they have supplied this information.</p>
---	--

SEXUAL ORIENTATION

<p>Details of impacts identified</p>	<p>We do not collect regular information on this characteristic, and it is not required to process, administer and monitor the Local Council Tax Support Scheme. Therefore, there is less information available to detail the impacts on this characteristic when compared to age, disability, race, and sex.</p> <p>That said, the proposed changes to the Council Tax Support scheme are not expected to have a differential impact on the grounds of sexual orientation.</p> <p>As the updated scheme is implemented, we will continue to monitor any implications for specific characteristics and will adapt accordingly.</p>
---	--

PREGANCY AND MATERNITY

<p>Details of impacts identified</p>	<p>We do not collect regular information on this characteristic, and it is not required to process, administer and monitor the Local Council Tax Support Scheme. Therefore, there is less information available to detail the impacts on this characteristic when compared to age, disability, race, and sex.</p> <p>The proposed changes to the Council Tax Support Scheme may negatively impact people who are pregnant or who have recently had a baby. In particular, the proposal to increase the minimum payment. This group may have less ability to increase their income, for example by increasing hours at work due to childcare responsibilities.</p> <p>As the updated scheme is implemented, we will continue to monitor any implications for specific characteristics and will adapt accordingly.</p>
---	--

RELIGION OR BELIEF

<p>Details of impacts identified</p>	<p>We do not collect regular information on this characteristic, and it is not required to process, administer and monitor the Local Council Tax Support Scheme. Therefore, there is less information available to detail the impacts on this characteristic when compared to age, disability, race, and sex.</p> <p>That said, the proposed changes to the Council Tax Support scheme are not expected to have a differential impact on the grounds of religion.</p> <p>As the updated scheme is implemented, we will continue to monitor any implications for specific characteristics and will adapt accordingly.</p>
---	--

GENDER REASSIGNMENT

Details of impacts identified	<p>We do not collect regular information on this characteristic, and it is not required to process, administer and monitor the Local Council Tax Support Scheme. Therefore, there is less information available to detail the impacts on this characteristic when compared to age, disability, race, and sex.</p> <p>That said, the proposed changes to the Council Tax Support scheme are not expected to have a differential impact on the grounds of gender reassignment.</p> <p>As the updated scheme is implemented, we will continue to monitor any implications for specific characteristics and will adapt accordingly.</p>
--------------------------------------	---

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	<p>We do not collect regular information on this characteristic, and it is not required to process, administer and monitor the Local Council Tax Support Scheme. Therefore, there is less information available to detail the impacts on this characteristic when compared to age, disability, race, and sex.</p> <p>That said, the proposed changes to the Council Tax Support scheme are not expected to have a differential impact on the grounds of marriage and civil partnership.</p> <p>As the updated scheme is implemented, we will continue to monitor any implications for specific characteristics and will adapt accordingly.</p>
--------------------------------------	--

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

The impacts identified in this EIA are not unlawful under the Equality Act, as the changes to the Council Tax Support scheme apply universally and are not explicitly targeted at any specific group.

The Act requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different groups. Disproportionate impacts on protected groups must be justified to show they are a proportionate means of achieving a legitimate aim. As such, this EIA includes:

1. A justification for the changes, showing that they are necessary and proportionate.
2. An explanation of measures available to minimise or address the disproportionate impacts, including the Council Tax Discretionary policy to enable the Council to consider cases of hardship.

3. A commitment to ongoing monitoring and engagement with affected groups to ensure compliance with equality obligations.

The proposed changes to the council tax support scheme are expected to have a disproportionate negative impact on working age adults, people with a disability, women, people who are pregnant or in the maternity period, people from an ethnic minority group and people who are socio-economically disadvantaged, and any particular disadvantage is justified for the reasons set out above in this report. The Council is pursuing the legitimate aim of balancing the Council's budget in the context of the anticipated required savings, so that the Council can continue to deliver statutory services. With uncertain Government funding, economic conditions, increasing demand for services and a forecast significant reduction in reserves the Council has had to consider a range of options to bridge the funding gap and enable us to set a balanced budget and continue to deliver statutory services. The proposals are proportionate in light of those budgetary pressures, given the steps taken to limit council tax payments for these groups, and the mitigating measures set out below. This proposal asks all residents to contribute towards Council services that they benefit from. For the same reasons, the Council considers that reasonable adjustments have been made in the revised scheme and mitigating measures to limit any disadvantage suffered by disabled persons. Given the need to make savings and balance the budget, it is not reasonable to go further and reduce still further the council tax that should be paid by this cohort.

The need to advance equality of opportunity between people who share and people who do not share a relevant protected characteristic.

As highlighted above, most working-age claimants will be required to contribute more towards their council tax. Claimants would therefore be expected to have reduced disposable income which may mean they are less able to participate in public life and community activities, for example leisure activities, groups, clubs, and organisations.

The need to foster good relations between people who share and people who do not share a relevant protected characteristic.

We do not anticipate that the proposals will have any impact on the Council's ability to foster good relations.

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

Yes, directly as part of the overall consultation exercise on the council's budget proposals. Secondly as part of an 8-week public consultation which includes contact with all current benefit claimants as well as other households, voluntary groups, and stakeholders.

Stakeholders in this assessment and what is their interest in it?

Stakeholders	Interest
Council Tax Support Claimants	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process.
Local interest groups have been contacted and drop-in sessions arranged/offered e.g. HUB partners, Brent Connect, Voluntary Organisations, Members of Disability forum etc.	<p>These groups may work with the affected claimants and will need to have the right information to provide support and advice.</p> <p>Drop-in session across all Brent Libraries were publicised on our website and correspondence to claimants.</p>
Brent households	Not implementing the scheme may put increased financial pressures on other Council services which may have an impact on some Brent households.
Heads of Revenues and Benefits	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process.
Corporate Director of Finance	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process and that the administration of the scheme is providing value for money to the council and Brent households.
Chief Executive	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process and that the administration of the scheme is providing value for money to the council and Brent households.
Cabinet Member for Finance	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process and that the administration of the scheme is providing value for money to the council and Brent households.
Council Cabinet	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process and that the administration of the scheme is providing value for money to the council and Brent households.
Leader of the Council	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process and that the administration of

	the scheme is providing value for money to the council and Brent households.
--	--

The feedback and findings from the consultation exercise will be published in a report to Full Council in February 2025.

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

Prior to Full Council determining the final scheme design in February 2025, the EIA will be reviewed and updated if appropriate.

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

The proposed changes to the current CTS scheme will have a disproportionate impact on low income working age households because CTS support is designed for low income working age households.

Any disadvantage is justified for the reasons set out in the consultation paper. The Council is pursuing the aim of reducing the Council’s budget gap of £16m for 2025/26 so that the Council can continue to deliver key statutory services. With uncertain funding from central Government, high inflation over the past 2 years, increasing demand for services and a forecast reduction in reserves, the Council has had to consider a range of options to bridge the funding gap and enable us to set a balanced budget and continue to deliver statutory services. The proposals are considered proportionate considering the budgetary pressures being faced by the Council. Working-age claimants will be required to contribute towards their Council Tax. The increased cost may mean claimants are less able to participate in public life and community activities.

The consultation collective comments and suggestions to the proposal are listed below:

- Lower the Minimum Payment: Reducing the current 35% minimum council tax payment, one of the highest in the UK, would help alleviate financial pressure on residents.
- Recognise Financial Vulnerability: Eligibility for CTS already indicates financial hardship and should be considered before enforcement actions are taken.
- Expand Discretionary Support: Making greater use of the Council Tax Discretionary Reduction Policy could offer critical relief to those most in need.
- Enhance Awareness of Support: The council could further refine and promote available support options for residents struggling with council tax bills.

Maintain Flexible Backdating Rules: Retaining the current backdating policy, which allows claims to be backdated to the start of the financial year for valid reasons, would ensure continued support for vulnerable residents. Having considered all above, in terms of mitigations, if anyone affected by the changes is struggling to afford the increase in their Council Tax charge, they would be able to approach the council for financial assistance. The

Council proposes to set aside £1.5m to further support households under the Section 13A Discretionary Policy, where justified this will mean reducing households' council tax charge

The Council operates through its Community Hubs, Libraries and Family Well-being Centres a holistic approach to welfare, financial support, and income maximisation for its households. This includes debt and budgeting advice. It will ensure that households who approach our services are advised appropriately and provided the correct financial support to avoid further debt.

The Council through its referral routes with voluntary partners and external organisations will proactively reach out to them providing additional support and signposting appropriately. Our strong relationship with the Health and Wellbeing teams, social prescribers and Adult Social Care teams will allow the Council to provide support for households struggling to pay and need financial aid.

Maintaining the Cost-of-Living information on the Council website to provide residents with information on help with housing costs, debts and bills, extra income, saving energy and help with food.

Working with voluntary and community sector organisations to promote the Hardship Fund. Supporting residents to maximise the application of council tax regulations, where reductions are based on circumstances that are not financial but based on non-financial circumstances e.g., disabled relief (based on adaptations to the property that can reduce the council tax liability to the equivalent to one band lower) and severely mentally impaired exemptions (based on doctor's certification and the award of appropriate disability benefits).

These are sometimes not claimed where Council Tax Support based on financial circumstances are claimed so these options may now become more beneficial to mitigate the impact in the reduced support. The Council will work with relevant voluntary groups and the Learning Disability Partnership Board to improve awareness and take up of these provisions.

Maintaining the principle that the Council Tax Support financial assessment for those with disabilities is based on higher applicable amounts and premiums (the Government assessment of need). This results in a higher award of Council Tax Support when compared with a household with no disability. Similarly, if in receipt of Universal Credit or legacy passported benefits such as Income Support, Income based

There is also a discretionary element to the proposed scheme, whereby the Council Taxpayer's liability may be reduced further if they are experiencing exceptional hardship or are impacted by extraordinary circumstances.

These reductions are made under Section 13A(1)(a) and (2) of the Local Government Finance Act 1992 (the 1992 Act) to:

- a) A person whom the authority considers to be in financial need,
- b) Or persons in classes consisting of persons whom the authority considers to be, in general, in financial need.

The proposed Council Tax Support scheme has been reviewed for its effect on groups with protected characteristics under the Equality Act, and a detailed Equalities Assessment has been prepared and is included in Appendix C

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

CTS caseload and expenditure will be monitored monthly during 2025/26.

Impacts on groups with protected characteristics will be monitored, through Council Tax Collection rates, Section 13A Discretionary applications and issues raised by households.

The Council is required to review its CTS scheme each year and to agree its scheme for the following year by 11 March of the preceding financial year. The scheme review for 2025/26 will include a full refresh of the EIA to establish whether there have been any unforeseen impacts which require addressing for 2026/27.

SECTION C - CONCLUSIONS

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

The council has taken care to review and update the CTS Scheme and to ensure that it is simple, efficient and has regards to the requirements made under the Government's statement of intent.

The proposal to introduce a minimum award amount has been developed to deliver a simpler, less administratively burdensome CTS scheme while reducing the overall cost of the scheme.

The proposal to have two flat rate non-dependant deduction is to reduce the administrative burden, however this will have an indirect impact on the applicant as it is assumed that the non-dependant will increase their contribution towards the Council Tax bill.

If anyone affected by the changes is struggling to afford the increase in their Council Tax charge, they would be able to approach the council for financial assistance. The Council proposes to set aside £1.5m to further support households under the Section 13A Discretionary Policy, where justified this will mean reducing households' council tax liability to zero.

The proposed changes will not affect pensioners. This is mandatory as legislation prescribes that CTS schemes in respect of pensioners must adhere to one national scheme.

This proposal will deliver £5m of savings to the Council's budget from 2025/26, which will help to protect front line services such as adult social care and children's services from further significant reductions.

The council is proposing to make these changes which will be adopted 1 April 2025 and will be in place for the duration of 2025/26, during which time its impact will be monitored.

SECTION D – RESULT

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

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	X
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.

Action	Expected outcome	Officer	Completion Date
Public and stakeholder consultation	Better understand potential impacts and incorporate mitigating actions for negative impacts.	Peter Cosgrove/ Asha Vyas/Sunita Ghudial	15 December 2024
Ensuring that changes to the scheme are communicated in an accessible way to claimants with an information or communication need e.g. caused by a disability or language barrier.	That claimants with information or communication needs are assisted where necessary so that they fully understand the change and any potentially potential impacts; and that they are less likely to fall into Council Tax arrears as a result.	Peter Cosgrove/ Asha Vyas/ Sunita Ghudial	January – March 2025
Ensure that the discretionary aspect of the new scheme is utilised	Officers identify and promote the discretionary aspect where appropriate.	Peter Cosgrove / Asha Vyas/	April 2025 – March 2026

<p>where appropriate to prevent hardship. This includes ensuring that staff training equips officers with the awareness to identify where a discretionary payment may be appropriate, and how such requests should be assessed.</p>	<p>Claimants in hardship are given additional assistance where appropriate.</p> <p>Claimants are less likely to fall into Council Tax arrears and have action taken against them through no fault of their own.</p> <p>Claimants do not suffer from unforeseen consequences arising from the change to the new scheme.</p>	Sunita Ghudial	
<p>To investigate opportunities to improve equality monitoring data in the future and to use this to inform decisions about scheme design in future years</p>	<p>To further improve the design of any future scheme based on additional data and impact analysis</p>	Sunita Ghudial / Asha Vyas	April 2025 ongoing
<p>To closely monitor the impacts of the new scheme on claimants; expenditure; Council Tax collection and age debt analysis and complaints and other indicators, particularly during the first year of operation</p>	<p>To further improve the design of the scheme in future years based on additional data and impact analysis.</p>	Sunita Ghudial / Peter Cosgrove/Asha Vyas	April 2025 – March 2026 and ongoing

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Sunita Ghudial
REVIEWING OFFICER: <i>* The manager with oversight of the</i>	Tom Pickup/Asha Vyas
Operational Director:	Thomas Cattermole

This page is intentionally left blank

Cumulative Equality Impact Assessment: Budget Proposals 2025/26

1 INTRODUCTION

The purpose of this equality assessment is to provide an analysis of the likely impact of the council's budget savings proposals on residents and community groups with 'protected characteristics' as defined by the Equality Act 2010. The nine protected characteristics are: age, disability, gender reassignment, marriage and civil partnership¹, race, religion or belief, sex and sexual orientation, pregnancy and maternity. Section 149, Public Sector Equality Duty (PSED) of the Equality Act 2010 requires the council in the exercise of its functions to have regard to the need to:

1. Eliminate discrimination, harassment, and victimisation and any other conduct prohibited under the act;
2. Advance equality of opportunity between persons who share a relevant protected characteristic and those who do not;
3. Foster good relations between persons who share a relevant protected characteristic and those who do not.

Whilst not a statutory requirement, it is our policy that where relevant an equality analysis should also cover socio-economic equality implications.

The council is committed to equity, diversity, and inclusion. It seeks to ensure that all residents, employees and stakeholders are treated fairly and receive appropriate, accessible services and fair and equal opportunities. This commitment requires that equality considerations play a key role in our decision-making processes; and in understanding the effect of our policies and practices.

Approach to considering equalities

The budget savings proposals have all been subject to an Equality Impact Analysis (EIA) screening, which helps to establish their relevance to the council's equalities duties and determine whether a full EIA is required. The screening assesses the potential or likely impact on service users and employees with protected characteristics. EIAs are living documents and if - as projects/proposals develop and further evidence of impacts becomes available – any unforeseen impacts emerge, they should be reviewed. Relevant leads for the

¹ Bullet point 2 and 3 does not apply to marriage and civil partnerships.

budget savings proposals requiring an EIA attended a bespoke EIA training prior to completing their analysis, covering the legislation underpinning the document, and the practicalities of completing it.

This document highlights the equality impacts for the 2025-26 budget proposals, and Full Equality Impact Analyses are attached.

Six proposals have been identified as requiring a full EIA. The equality impacts concerned with these proposals are summarised in this report. The council must carefully consider and have due regard to the impact of its savings proposals on the PSED; and take a reasonable and proportionate view regarding the overall impact and seek to mitigate impacts where possible.

Overall Assessment

No direct discrimination has been identified as a result of the budget proposals. A small proportion of the savings proposals may have a negative impact on equality of opportunity and may have a negative impact on opportunities to promote good relations, however measures have been identified to offset this.

These impacts will be kept under review. The proposed budget saving proposals are considered reasonable and have shown due regard to the PSED.

Page 324

2 DEMOGRAPHY OVERVIEW

Key facts about Brent's demographic profile are taken from the data sources [Population change in Brent](#) and the [Equality profile of Brent](#). They show the make-up of the borough, help us to identify potential impacts; and identify the increasing pressures and demand for council services.

- Brent is home to around 344,500 residents and is the fifth largest borough in London.
- The borough has a population density of 7,969 people per square kilometre – the 14th highest density in England, and the highest in Outer London.
- Brent has high levels of population mobility: During 2022-23, 44,300 people moved into the borough and 43,400 residents moved out. This equates to a population turnover rate of 255 per 1000 population, the 18th highest rate in England, and the highest across Outer

London Boroughs. This high level of mobility contributes to shifting demographics, with Indian and Romanian migrant populations increasing by 23% and 187% respectively since 2011.

- The population of Brent grew by 6.2% over the period 2013-2023, similar to the rise across London and England (6.0% and 7.0%). Over the last ten years, Brent's population growth has been driven primarily by natural change (more births than deaths) as opposed to net migration. The birth rate has fallen over the year but remains well above the national average.
- The population is projected to grow between 17% to 27% over the period 2023-2041, with the 'central' scenario predicting that the population will grow by around 24%, with the population expected to reach around 431,000 by 2041. If realised, this would lead to an additional 82,500 residents by 2041 – around 4,600 additional residents per year
- In line with national trends, the population is ageing: by 2041, the number of Brent residents aged 65 and over is projected to increase by 85% – an additional 34,900 older residents by 2041. The child population is also expected to grow, albeit more slowly, by 12% by 2041 (+8,600 children).
- Population growth is expected to be concentrated in the areas where significant housing development is planned. The three wards likely to see the biggest population growth are Alperton, Wembley Park and Roundwood. Considered together, these three wards are projected to accommodate an additional 43,700 residents by 2041 (53% of the total growth across Brent)

A summary of the key protected characteristics in Brent are as follows:

Age

- In common with other London Boroughs, Brent has a relatively young population: the median age of the population is 35.5, similar to London (35.9), but five years lower than the national trend (40.4). Compared with England, Brent has proportionately more young adults and fewer over 50s. One in four Brent residents are aged 20-34 compared with around one in five nationally (25% vs. 19%), while 29% of the borough population is aged 50 or over compared with 38% nationally.

Disability

- Around one in seven Brent residents have a long-term health problem or disability that limits their day-to-day-activities in some way. The prevalence of disability rises sharply with age: more than half of all residents aged 65 and over had a long-term health problem or

disability.

Gender reassignment

- The 2021 census found that approximately 0.5% of the population in England and Wales are identified as transgender. In Brent, this would equate to roughly 1,700 people.

Marriage and civil partnership

- Of Brent residents aged 16 years and over, 43.5% said they had never been married or in a civil partnership in 2021, up from 42.1% in 2011. The increase in the percentage of people who had never been married or in a civil partnership was higher across London (2.1%) than in Brent (1.4%). These figures include same-sex marriages and opposite sex civil partnerships.

Pregnancy and maternity

- Brent has higher fertility rates than nationally. During 2022, there were 4,431 births in Brent – which equates to a general fertility rate of 55.8 births per 1,000 women aged 15 to 44, higher than the rate across England (51.9) and London (50.5).
- In common with other areas, the birth rate has been falling in recent years. In Brent, the general fertility rate dropped from 66.0 in 2013 down to 55.8 in 2022. Similar trends are evident across London and nationally.

Race

- Brent has one of the most ethnically diverse populations in the country. The majority of residents are from ethnic minority groups: 65% are from Black, Asian, and Minority Ethnic groups (the 2nd highest rate in England & Wales, after Newham at 69%), and 19% are from White minority groups. Brent and Newham have the smallest White British populations nationally (15%).

Religion or belief

- Brent residents are more likely to have a religion than those elsewhere: overall, 80% of residents had a religion compared with 57% nationally – the 4th highest rate in England & Wales.
- Brent's largest religious group is Christian (39%), though the borough has a smaller Christian population than nationally (46%). Around one in five residents are Muslim (21%), well above both the London and national averages, and the 15th highest rate nationally, and around 16% of residents are Hindu - the 3rd highest rate in England & Wales. Other smaller, but significant, religious groups in Brent include, Jewish (1.1%); Buddhist (0.9%); Jain (0.7%) and Sikh (0.5%) populations.

Sex

- The Brent population is 49% male and 51% female. Females comprise just over half (51%) of the population but make up a higher proportion of the elderly population: 59% of those aged 80 and over are female and this rises to two thirds for the over 90s (67%). The sex ratio in Brent is similar to that across London and England & Wales (both 51% female).

Sexual orientation

- In the 2021 census, 96.4% of adults who answered the sexual orientation question identified as straight or heterosexual, and 3.6% identified as LGB+. This is below the London average (4.3%) but above the national rate (3.3%).

3 IMPACT OF SAVING PROPOSALS

Summary 25/26 budget proposals

Although initial equality screenings have been undertaken to ascertain impact in terms of the Public Sector Equality Duty (PSED), some of the proposals are in their formative stages and are still to be developed or are subject to consultations. Consequently, as the proposals are developed, further equality analysis will be undertaken to assess the PSED. Where a full equality impact assessment has been carried out, this is noted next to the proposal.

The proposals are:

CHW01 25-26 Increasing reablement to prevent future cost: Aims to expand reablement services by increasing specialist staff to support mental health and learning disabilities clients and handling demand growth via Quality Assurance Monitoring. This "spend-to-save" initiative could be initially funded by the Market Sustainability Improvement Fund, adding 2-3 posts. The plan is modelled on extending the £400k savings achieved in 2023/24.

CHW02 25-26 Increase Shared Lives capacity to provide as an alternative to respite in residential care: Increases the number of Shared Lives carers to provide respite for individuals with learning disabilities. By expanding the Shared Lives programme, we can allocate more

learning disabilities customers to these carers, thereby reducing reliance on more costly residential respite placements and creating significant budget savings. **Full Equality Impact Assessment completed.**

CHW03 25-26 Modernising Adult Social Care Approach to Assessment and Review: Develop a sustainable model for assessment and review that is responsive to the increasing demands in the community and allows the service to respond promptly to referrals and annual proportionate reviews introducing a greater range of assessment methods (community appointments, greater use of Voluntary Community Sector (VCS) partners, online assessment) and approaches to annual reviews (provider, telephone and questionnaire-style). This will reduce pressures on adult social care teams and enable a reduction in staff (agency) costs.

CHW04 25-26 Implementation of Telecare Service Charges: To support the costs of telecare services, a charging scheme is proposed for users deemed able to pay through financial assessment. Telecare, offering remote monitoring and emergency response, aids individuals living independently. With 3,000 users, a £2 weekly fee could generate income, accounting for some users declining the service. Consultation with Adult Social Care service users and residents without ongoing care packages would be required before implementation. **Full Equality Impact Assessment completed.**

CYP01 25-26 LAC and Permanency/FPPP: Gordon Brown Centre Reduction in the Contribution for Promoting Independence work to Care Leavers by 50%: These savings would be achieved by reducing the funding provided to the Promoting Independence project, delivered to Brent Care Leavers through the Gordon Brown Centre (GBC). The GBC is the Council's outdoor activity centre based in Hampshire, used primarily by schools and settings. **Full Equality Impact Assessment completed.**

CYP02 25-26 Reduction in discretionary spend on the use of taxis and client subsistence payments: There are two elements to this proposal – a reduction in discretionary spend on taxi fares and a reduction in discretionary spend on client payments for care leavers. This proposal will require changes in practice across CYP to ensure the ability to deliver it from April 2025. **Full Equality Impact Assessment completed.**

CYP03 25-26 Cease the Safe Base Brent offer: The Safe Base service is a mental health and wellbeing support service for Brent Care Leavers up to the age of 25 in higher education/apprenticeships. The highest percentage of service users are those attending university. The service is relatively longstanding (6 years) and around 25 young people access support each year. **Full Equality Impact Assessment completed.**

LG01 25-26 Reduction in Members Allowances budget: Spend for the year, including new uplift and additional Cabinet Member is predicted to be less than total budget. The saving that could be offered is £50k.

LG02 25-26 Reduction in Car Club costs: Based on past spending under the contract (which is determined by use) the budget for this contract could be reduced by £30k. An additional £20k could be saved through capping Directorate spend through the central budget. This would encourage use only when this form of transport is most cost effective.

LG03 25-26 Outsource Occupational Health Service: Outsource the provision of Occupational Health services to managers and staff at the council. In the course of procuring a provider, reduce the cost of the current provision that is delivered by agency staff. By switching to an external provider, the Council would only pay the costs for our actual usage.

LG04 25-26 Deletion of two Trainee positions in Legal Services: One trainee solicitor post and one apprentice solicitor post will be deleted.

LG05 25-26 Increase in income – Legal Services Property and planning: The income target for work undertaken for or charged to 3rd parties by the Property and Planning team has exceeded targets and it is considered a higher target could be set.

NR01 25-26 Increase charge for bulky waste collection: Increase the charge for bulky waste collections from £40 to up to £55 per collection, generating additional income of up to £30k annually, while remaining competitive with neighbouring boroughs.

NR02 25-26 Increase garden waste annual subscription: Raise the annual Garden Waste subscription fee by £4 to £69, generating an estimated £55k in additional income from approximately 15,000 signups/renewals.

NR03 25-26 Increase to existing, or introduction of new, charges for additional and replacement waste containers (residual, recycling, food): Introduce a £5 flat-rate delivery charge for recycling and food bin containers, aligning with Veolia contract practices and generating income to offset the current £10k monthly delivery cost.

NR04 25-26 Stop subscription for Recyclopedia: Ending our subscription for Recyclopedia, a recycling information subscription, to save about £6k on annual subscription charges. Currently the Council get about 12,000 clicks a month on average.

NR05 25-26 Staffing and Structures Review of Public Realm Services: Savings from a review and reorganisation of neighbourhood staffing and structure in Public Realm to complement place-making agenda; deletion of 3-4 posts depending on grade.

PHRS01 25-26 Reducing staff posts and contract spend within the Shared Technology service: To reduce support for Brent by approximately three FTE through a restructure and changes to business processes and through re-procurement of contracts. This saving will also impact on the other boroughs which use the service and similar savings are being agreed with Lewisham and Southwark.

PHRS02 25-26 Reducing posts within the Communications, Insight and Innovation (CII) department: CII includes a number of support services as well as teams which lead work on our innovation, data and digital programmes plus the Communications, Conferences and Events team. Where possible, the saving will be delivered by deleting vacant posts or through voluntary redundancies but there may be a need for compulsory redundancy.

PHRS03 25-26 Increasing commercial income generated from The Drum: By refocusing the team on more proactive external sales it will be possible to build on the venue's recovery and further increase occupancy rates of The Drum (particularly for the Grand Hall and Conference Hall) and thereby generate an extra £100,000 in commercial income per annum.

PHRS04 25-26 Achieving management efficiencies across Revenue and Debt, Customer Services and Assessments and Brent Community Hubs: An amalgamation of management posts across Revenue and Debt, Customer Services and Assessments and Brent Community Hubs.

PHRS05 25-26 Achieving management efficiencies within Libraries, Arts and Heritage: Achieving management efficiencies within Libraries, Arts and Heritage without adversely affecting service users.

PHRS06 25-26 Increased income across Mortuary & Bereavement Operations (including Cemeteries) and Registration and Nationality: Increased income generated across Mortuary & Bereavement Operations (including Cemeteries) and Registration and Nationality services.

PHRS07 25-26 To reduce posts within the Communities and Partnerships Department: Savings will be delivered predominantly by restructuring of existing roles within the directorate. Where appropriate, savings can also be made through offering vacant posts.

Council Tax: Increase Council Tax by 4.99%, where 2% is ring fenced for Adult Social Care and 2.99% is a general increase. The council is required to make significant savings to deliver a legally required balanced budget. To help overcome this it is proposed to increase council tax by 4.99%, where 2% is ring fenced for Adult Social Care and 2.99% is a general increase. The proposal will generate an additional £8.1m of recurring income for the Council and therefore avoid having to make further savings to key council services such as adult social care, children's services, etc. **Full Equality Impact Assessment completed.**

New Council Tax Support Scheme: The Council is proposing to amend the Council Tax Support scheme by introducing a standard 35% minimum payment for all working-age households, with Council Tax Support determined by income bands. Non-dependant charges are proposed to be simplified to flat rates of £8 per week for those out of work and £20 per week for those in work, streamlining the process

and reducing the administrative burden. The proposal will generate savings of £5m, helping to avoid making further cuts to essential services. **Full Equality Impact Assessment completed as part of a separate approval process.**

Proposals Requiring a Full Equality Impact Assessment

The proposed savings look to generate income for the Council, or to reduce or restructure service delivery for service users. Six budget savings proposals completed a full equality impact assessment due to the potential impact they may have on service delivery through the reduction or change in the service being provided. Attached to this report are the supporting EIA screenings for each savings proposal as well as the full Equality Analysis (the latter of which are summarised below). The proposed changes to the Council Tax Support Scheme have been subject to a separate consultation and equalities impact assessment that will be considered by Cabinet and Council in February 2025 and have been referenced below for completeness and transparency, noting the cumulative impact along with the other budget savings proposals.

Page 331

CHW02 (25/26): Increase Shared Lives capacity to provide as an alternative to respite in residential care

The proposal is to widen the Brent Shared Lives offer for clients diagnosed with a mental health, learning disability, and/or autism spectrum disorder. Shared Lives is a Care Quality Commission (CQC) regulated in-house adult fostering or house sharing service, in which the client receives around the clock care according to their assessed eligible care needs. Carers, who are registered as self-employed, receive a weekly payment for the service they provide as well as annual essential and bespoke training. The goal of the proposal is to double the intake of Shared Lives Carers and provide more placements within the community, contributing towards the council's long-term savings plan, whilst continuing to offer quality based, cost-effective long term and respite placements.

Overall Impact: The proposal has positive impacts for older adults and disabled people, as the program's expansion will allow for more clients to access the program, which compares favourably to residential care or supported living options in terms of duration and meeting their assessed care and support needs.

CHW04 (25/26): Implementation of Telecare Service Charges

The proposal is to implement charges for telecare services, which include 24/7 specialist telephone helpline support and assisted technologies like alarms and GPS trackers, helping vulnerable individuals maintain independence and receive critical support when needed. The proposal aligns with the council's principle of charging only those who can afford to pay, while ensuring no one is required to contribute beyond their means. A public consultation and detailed engagement process will precede implementation.

Age: Older adults, who make up the majority of telecare users, may experience a reduction in disposable income due to charges.

Disability: Disabled service users may experience a reduction in disposable income due to charges.

Race: Two-thirds of Adult Social Care service users are from ethnic minority backgrounds, reflecting a disproportionate impact.

Overall Impact: The proposal has negative financial impacts on some service users, particularly older adults, disabled people, and people from ethnic minority backgrounds. Mitigations including financial assessments, disability-related expenditure exceptions, income maximisation, and a public consultation process will help to ensure fairness and minimise hardship. Monitoring mechanisms will track ongoing impacts to ensure the policy remains equitable.

Page 332

CYP01 (25/26): LAC and Permanency/FPPP: Gordon Brown Centre Reduction in the Contribution for Promoting Independence work to Care Leavers

The proposal seeks to reduce the annual contribution for Promoting Independence work for Brent Care Leavers from £160K to £80K. This reduction will halve the number of weekends available for independence skills training at the Gordon Brown Centre (GBC) from 12 to 6 annually. The GBC programme equips care leavers with essential independent living skills including basic DIY, problem-solving for household issues, and the use of practical tools. While the service will remain in place, the reduction may result in delays for young people accessing the programme, potentially affecting their readiness for independent living. Mitigations include increasing the cohort size on GBC weekends and monitoring the impact on care leavers' progression to Brent Housing Panel.

Age: There is a negative impact on care leavers aged 16-25 who are eligible to attend GBC weekends to build skills for independent living. The reduced frequency may delay this cohort's readiness for independence, leading to slower progression to Brent Housing Panel for housing support.

Race: Care leavers from Black, Asian, and Minority Ethnic backgrounds are disproportionately represented in the care system, making them more likely to be affected by this reduction.

Overall Impact: The proposal has negative impacts on care leavers aged 16-25, who may be disproportionately from Black, Asian, and Minority Ethnic backgrounds. The reduced capacity of the GBC programme may lead to delays in care leavers' readiness for independent living, affecting their ability to access stable housing. The council justifies these changes due to budget constraints and proposes mitigations, including offering additional GBC weekend slots (if data indicates they are needed) via tracking the impact on care leavers' progression to housing. The proposal will be monitored quarterly, and adjustments will be made if the reduction leads to increased costs for high-support accommodation for care leavers.

CYP02 (25/26): Reduction in discretionary spend on the use of taxis and client subsistence payments

The proposal aims to reduce discretionary spending on taxi fares and subsistence payments for care leavers. The objective is to encourage greater use of public transport (via bus passes and Oyster cards) and reduce extended subsistence payments beyond the current six-week support period. While the proposal seeks to promote independence and reduce costs, it could disproportionately impact vulnerable groups such as children, care leavers, and families, especially in emergency or safeguarding situations. Mitigation measures include retaining access to taxis in emergencies and supporting the transition to alternative travel options.

Age: Young people, including those in care and care leavers, may experience challenges in attending school or critical appointments, potentially affecting educational outcomes.

Disability: Those with mobility or learning disabilities may face additional challenges using public transport due to accessibility issues.

Race: Disproportionate representation of ethnic minority children in care may result in a greater impact on these groups, especially in terms of access to education and essential services.

Sex: Reduced access to taxis may create safety concerns for young women and girls, particularly when traveling at night.

Sexual Orientation: Young LGBTQ+ people may feel unsafe using public transport due to past experiences of discrimination or bullying.

Gender Reassignment: Those undergoing or having undergone gender reassignment may experience safety risks in public spaces, impacting their comfort with public transport use.

Overall Impact: While the proposal promotes cost savings and aims to foster greater independence for care leavers, it has negative implications across the protected characteristics of age, race, disability, sex, sexual orientation, and gender reassignment. The council plans to mitigate these impacts through emergency taxi provisions where necessary, and enhanced guidance on discretionary payments. Monitoring and review processes will be implemented to track the impact on outcomes for care leavers.

CYP03 (25/26): Cease the Safe Base Brent offer

The proposal is to end the Safe Base service, a mental health and well-being support service for Brent care leavers in higher education or apprenticeships, which supports around 25 young people annually. The proposed service closure will achieve budget savings in the Brent Virtual School and Educational Psychology Service. Care leavers using the service will be signposted to free alternative services such as Young Minds, Kooth, and Free Your Mind, as well as mental health support available through universities and colleges. The council will ensure that all young people currently using the service have an allocated Personal Advisor (PA) to monitor their well-being.

Age: Care leavers aged up to 25 will be directly impacted by the closure of the Safe Base service. As young people transitioning to independence, they may face challenges in maintaining mental well-being without tailored support.

Disability: Care leavers with disabilities, including mental health conditions, may face barriers in accessing general mental health support services, as these services may not offer the same level of personalisation as Safe Base.

Race: Ethnic minority groups are disproportionately represented in care leaver populations, meaning this proposal could have a greater impact on Black, Asian, and minority ethnic care leavers.

Overall Impact: The proposal to cease the Safe Base service negatively impact on age, race, and disability. Young people in higher education, especially those from ethnic minority backgrounds or those with mental health conditions, may face challenges in accessing alternative support. However, these impacts are justified by the availability of alternative mental health services from Young Minds, Kooth, and Free Your Mind, as well as wellbeing support provided by universities and colleges. To support care leavers through this transition, Personal Advisors will monitor and report on any concerns arising from the service closure. The phased reduction of the service, from three days to one, aims to reduce the negative impact of an abrupt service withdrawal.

Increase in Council Tax by 4.99% in 2025/26

To deliver a legally required balanced budget, it is proposed to increase Council Tax by 4.99%, where 2% is ring fenced for Adult Social Care and 2.99% is a general increase. The proposal will generate an additional £8.1m of recurring income for the Council and therefore avoid having to make further savings to key council services such as adult social care, children's services, etc.

Impact on protected groups: The increase in Council Tax will impact all residents within Brent who are eligible to pay Council Tax. As the increase has universal application, no particular group is targeted. However, although no protected characteristic is impacted more than another it is likely that some residents who do not qualify for Council Tax support (i.e. do not meet the threshold to receive financial support), will struggle to pay the additional Council Tax amount. In addition, the proposed cuts to the Council Tax Support Scheme for Financial Year 25/26 will mean that there will be less financial support available to residents, should they need it.

Overall impact: Although the overall impact has been suggested as neutral, an increase in Council tax will impact on middle to low-income earners who are also impacted by the cost-of-living crisis, and potentially those from protected groups. However, for the most vulnerable residents, the Council Tax Support scheme will partially mitigate this impact for those households who are living on low incomes and are eligible for Council Tax Support. The Council is also proposing to set aside £1.5m for a hardship fund to support residents under the Section 13A Discretionary Policy, where justified this will mean reducing residents' council tax liability to zero. Further mitigating actions are also available for residents and are highlighted in the socio-economic implications section.

New Council Tax Support Scheme

To make significant savings, the Council is proposing to adjust the council tax savings scheme by introducing a standard 35% minimum payment for all working-age households, with Council Tax Support determined by income bands. Following a public consultation, a decision on the Council Tax Support Scheme for 2025/26 will be made in March 2025 by Cabinet . The proposal is projected to generate savings of £5m, helping to avoid making further cuts to essential services.

Impact on protected groups: The proposed changes to the Council Tax Support Scheme will have a negative impact on all residents eligible to pay Council Tax, and a disproportionate impact cannot be ruled out. Most claimants are female, indicating a potential disproportionate effect by gender. People between the ages of 46 and 66 make up most claimants, indicating this age group are also more likely to experience a disproportionate impact. Although socioeconomic status is not a protected characteristic, most claimants in receipt of working-age council tax support under the current scheme fall into the lowest income category and receive the highest level of

support. As a result, lower income households will be more impacted, and there may be a disproportionate socioeconomic implication to consider. Lower income households are also more likely to be from minority ethnic backgrounds, increasing the potential for disproportionate impacts based on race.

The proposed 5% increase to Council Tax for Financial Year 25/26 will also mean that council taxpayers will be more likely to have trouble meeting their financial obligations, particularly those on low incomes or with limited financial resilience.

Overall impact: The overall impact of the proposed changes will negatively impact all residents eligible to pay Council Tax, and will disproportionately impact low income working age households, who are more likely to be from a minority ethnic background. To mitigate these impacts, the Council proposes to set aside £1.5 million under the Section 13A Discretionary Policy to provide financial assistance to those struggling with the increased charges. Further mitigating actions are also available for residents and are highlighted in the socio-economic implications section.

4 CUMULATIVE IMPACTS

The table overleaf summarises the potential negative cumulative impacts on groups which have a protected characteristic.

Five of the Equality Impact Assessments have identified the potential for negative impacts. While there are specific justifications for the negative impacts, in summary they stem from the need to make necessary financial savings as a result of high inflation, increased demand for services, and pressures in temporary accommodation, among other contributing factors. Where potential negative impacts have been recognised, corresponding mitigation activities have also been identified wherever possible, with the goal of minimising the impacts felt by specific groups. It is also noted that several of the proposals aim to create sustainable long-term care and support services, which will over time have a positive impact as they aim to provide greater independence to clients.

Age, race, and disability are the most predominant groups impacted upon. Regarding race, available data from the Equality Impact Assessments has shown that a larger proportion of service users are from Black, Asian, and other Minority Ethnic backgrounds, which is reflective of Brent demography, as noted in the Demography Overview in section 2. It is, therefore, more likely that this protected group will be impacted to a greater extent by a reduction or change in services than other users.

While care experience is not yet a legally protected characteristic, the Council has demonstrated commitment to recognising and treating care experience as an internal protected characteristic, with work underway to determine how it can be embedded within our processes and approaches. It is noted that multiple savings proposals negatively impact this group, but that mitigation activities are in place to minimise them to the extent possible.

Given the nature and number of the proposals put forward impacting protected groups, consideration needs to be given to the cumulative impact of these proposals. It is possible that some individuals will be impacted by more than one of the proposals being put forward and therefore will be hit harder by these changes. Where proposals are accepted, the intersectional impacts will be monitored and evaluated over time and across services, to the extent that available data allows. It is likely that some service users also belong to more than one protected group and are impacted by more than one of these proposals. Although our current data collection systems don't allow us to identify these intersectional impacts definitively, as EIAs are reviewed over the lifespan of the project, we will monitor trends and impact and make adjustments accordingly. While we don't have a cumulative mitigation strategy for negative impacts in place, mitigation activities are recorded in the full EIAs for each proposal with associated negative impacts.

Proposal	Age (e.g. children & elderly)	Disability	Gender Reassignment	Marriage or Civil Partnership	Pregnancy or maternity	Race	Religion or Belief	Sex	Sexual Orientation	Service Area
Increase Shared Lives capacity to provide as an alternative to respite in residential care CHW02-25/26	+1	+1	0	0	0	+1	0	0	0	Adult Social Care
Implementation of Telecare Service Charges CHW12-25/26	-1	-1	0	0	0	-1	0	0	0	Adult Social Care
LAC and Permanency/FPPP: Gordon Brown Centre Reduction in the Contribution for Promoting Independence work to Care Leavers CYP02-25/26	-1	0	0	0	0	-1	0	0	0	Children and Young People

Reduction in discretionary spend on the use of taxis and client subsistence payments CYP13-25/26	-1	-1	-1	0	-1	-1	0	-1	-1	Children and Young People
Cease the Safe Base Brent offer CYP15-25/26	-1	-1	0	0	0	-1	0	0	0	Children and Young People
Council Tax increase	0	0	0	0	0	0	0	0	0	Council wide
New Council Tax Support Scheme	-1	-1	-1	-1	-1	-1	-1	-1	-1	Household Services
Overall impacts	-4	-3	-2	-1	-2	-4	-1	-2	-2	

5 SOCIO-ECONOMIC IMPLICATIONS

Certain groups within the population are more likely than others to live in a low-income household. In Brent, survey analysis shows that those living on lower incomes are more likely to be from Black ethnic groups; residents with a disability or long-term illness; older residents; those with no qualifications; those who are not in work; and those who live in social housing.

The Council is currently updating the Brent Black Community Action Plan (the Plan) to ensure its priorities remain relevant and responsive to the changing context of recent years. The Plan will be updated in early 2025 following a series of community consultations, including one held in November 2024, which identified support for employment and enterprise as a priority theme. Within this theme, specific programs and projects will be developed to promote inclusive economic growth.

There are projects underway to support residents with learning disabilities, mental health, autism, and who are neurodiverse into paid employment, including a partnership which identifies and offers work placements within Adult Social Care services for individuals diagnosed with autism. Additional activities include tailoring existing direct payments to those in receipt of support to focus on seeking engagement and employment opportunities, and creating navigation services in the Council's day service, working closely with the Department for Work and Pensions.

The proposals regarding increasing Council Tax and adjusting the Council Tax Support Scheme have the potential to negatively impact on middle to low-income earners, and families and residents from lower socio-economic groups, who are also impacted by the cost-of-

living crisis. This will be mitigated by early and accessible communication with residents affected, continuing to offer support for vulnerable residents, and more effective working with partners to ensure resources are used effectively.

The Council is aware of the cumulative impact of the cost-of-living crisis and the support that our residents and service users may require at this time. The following support has been made available:

Financial Support: households across Brent can access financial assistance through the following funds:

- Resident Support Fund: this is available to Brent residents who are having difficulty due to unforeseen financial circumstances.
- Discretionary Housing Payment: A one off payment can be provided to assist with rent shortfall, rent deposits and rent in advance if a Brent resident needs to move home.
- Council Tax Hardship Fund: The Council is also proposing to set aside £1.5m for a hardship fund to support residents with Council Tax payments under the Section 13A Discretionary Policy of the Local Government Finance Act.

Certain eligibility criteria must be met to access financial support.

Support and Advice: Brent Hubs can provide support and advice to Brent residents who are struggling to pay their utility bills. This can include assistance with completing funding applications for support from local and national schemes, including the Brent Resident Support Fund, referral routes to other advisory agencies who specialise in energy support such as Green Doctors and SHINE, referral routes to food banks and emergency supermarket vouchers and urgent support with topping up pre-payment gas and electricity meters.

Brent's Family Wellbeing Centres also provide a range of community-led services to families that live in Brent and offer support for a range of topics including help with finding childcare and free nursery entitlements, sessions with employment advisers and support in returning to work, as well as sector specific recruitment events and programmes.

In addition, the New Horizons Centre which opened in January 2025 on the site of the previous New Millennium Day Centre, offers an expanded range of support services, including a new Community Wellbeing Service. This initiative, a partnership between the Council and local charity Sufra NW London is designed to support low-income households with access to affordable groceries, healthy meals, and one-to-one support through a £4 per week membership model. Throughout 2025, the centre will continue to add new services, including family housing needs assessments, employment support, and debt and immigration advisors.

6 STAFFING IMPLICATIONS

Of the budget proposals that were subject to an equality screening, several have staffing implications arising from staff restructures or service redesign. Where there are staffing implications for a third party, the council will work with the third-party organisation to ensure that the equality implications are understood, and appropriate steps taken to minimise any adverse impacts.

To mitigate against compulsory staff redundancies, a number of the proposals will achieve a reduction by giving up vacant posts or through natural turnover. In these cases, it is considered that there will be no impact on protected groups. The Council also offered a voluntary redundancy scheme in June-August 2024, giving employees the opportunity to voluntarily leave the Council with a financial package, and helping to achieve necessary financial savings. This was done with the intention of minimising the need for compulsory redundancies. When the council is required to undertake compulsory redundancies, full EIAs are undertaken as part of the consultation process.

Budget Scrutiny Task Group Findings Report

Draft Budget 2025/26

28 January 2025



Foreword

This year's Budget Scrutiny Task Group Review highlights the ongoing financial crisis in local government, threatening the stability of services and communities across Brent.

While I welcome the new government's first steps towards reforming local government finance—something previous administrations long promised but failed to deliver—there is much more to be done. Positive measures, such as increased investment in addressing homelessness, the simplification of grants to allocate funding based on need rather than false competition between local councils, and the confirmation of long-awaited multi-year funding settlements, are all steps in the right direction. However, these actions fall short of the comprehensive reforms needed for local government to fully meet its responsibilities to residents. The temporary accommodation subsidy gap is just one area which must be urgently addressed to prevent growing deficits and the over-reliance on reserves across London councils.

The proposed changes to Brent's Council Tax Support Scheme—the most significant in a decade—will also have a profound impact on residents. While necessary to ensure financial stability and the sustainability of council services, the effects of these changes must be carefully monitored to avoid burdening vulnerable residents with unmanageable debt.

Despite these challenges, the council's budget setting process continues to demonstrate a commitment to prioritising those most in need. For instance, shifting to a more localised, community-based approach for social care assessments will enhance collaboration with trusted community partners, provide stronger support to residents within their own



communities and networks, and reduce barriers, like long wait times, ensuring quicker access to services during critical moments.

I would like to thank the stakeholders and community advocates who have contributed to this report. Your input is invaluable to the well-being of our communities and borough.

Cllr Rita Conneely

Chair – Resources and Public Realm Scrutiny Committee

Contents

Introduction	1
Recommendations	2
Evidence Sessions	5
Other Meetings	19
Conclusion	19
Participants	20

Members of the Budget Scrutiny Task Group

The Budget Scrutiny Task Group was a joint effort between the council's two scrutiny committees, with representation from both the Resources and Public Realm Committee (RPR) and the Community and Wellbeing Committee (CWB). The group comprised of the following members:

Councillor Rita Conneely – Chair

Councillor Ihtesham Afzal

Councillor Janice Long

Councillor Kathleen Fraser

Councillor Michael Maurice

Task Group Terms of Reference

The following terms of reference were agreed at the RPR meeting on 4 September 2024:

1. Consider the Cabinet's budget proposals for 2025/26
2. Receive evidence from cabinet members, senior departmental officers, and any other relevant stakeholders
3. Agree a draft report to comment on the budget proposals for submission to the RPR Committee for ratification and submission to Cabinet



1. Introduction

Context:

- 1.1 Brent, like many other local authorities, continues to grapple with ever-growing service demand amid a stark absence of meaningful reform in local government finance. These challenges are compounded by the lasting impacts of the Covid-19 pandemic, the ongoing cost-of-living crisis, and persistent demographic pressures, such as an aging population and growing complexity of client needs. Most notably, the Quarter 3 2024/25 financial forecast reveals a concerning financial picture for the council. Increased homelessness and a dwindling supply of suitable temporary accommodation (TA) have driven a projected £17.6 million overspend against the revenue budget. If sustained until year end, this would require a transfer from unallocated reserves, thus depleting the council's reserves.
- 1.2 While the Autumn Statement and Provisional Local Government Finance Settlement provide much welcomed additional funding, the council faces unavoidable cost increases next year, like the indirect costs of employer National Insurance contributions. These new expenses, combined with existing inflationary pressures and high demand for services, necessitate a continued focus on prudent financial management.
- 1.3 To achieve a balanced budget in 2025/26, the council must generate £16 million in savings. This is proposed through a combination of service cuts (£4.4m), a reduction in Council Tax Support (£5m), operational efficiencies (£6.5m), and a 4.99% Council Tax increase (including a 2.99% general increase and a 2% Adult Social Care Precept).
- 1.4 The council's final budget position will be determined following the announcement of the Final Local Government Settlement and the subsequent publication of the final Budget 2025/26 ahead of Brent's Cabinet meeting on 10 February 2025.
- 1.5 The Task Group's findings are therefore based on the assumptions outlined in the Draft Budget 2025/26.

Role of Task Group:

- 1.6 Brent's decision-making framework gives a clear and important role to Overview and Scrutiny in budget-setting. The process for developing proposals for the budget and capital programme is outlined in the Brent Council Constitution, Part 2, Standing Order 19. This requires that the Cabinet's budget proposals be considered by the council's RPR Scrutiny Committee. Upon completion of its review of the proposals, the committee will submit a report outlining its deliberations and comments to the Cabinet.
- 1.7 At its meeting on 4 September 2024, the RPR Committee established a Budget Scrutiny Task Group to scrutinise the Draft Budget 2025/26¹. The Task Group held a series of meetings between October and December 2024 to prepare this report. These included internal discussions to refine the Task Group's findings and recommendations, and engagements with the Cabinet, Corporate Management Team, and key partners (please see section 6 for full list of participants). Through these sessions, the panel sought to identify and assess key budget pressures, risks, and

¹ Establishment of Budget Task Group Report (September 2024):
<https://democracy.brent.gov.uk/documents/s144282/07.%20Establishment%20Scrutiny%20Budget%20Task%20Group%20Sept%202024.pdf>

uncertainties, rigorously test the assumptions underlying the draft budget, examine resource allocation strategies, and consider the overall impact of the budget proposals on residents and partners.

- 1.8 For the purposes outlined in the Constitution, this report will be considered by the RPR Committee on Tuesday 28 January 2025. Pending agreement, the report will then be presented to Cabinet for consideration on Monday 10 February 2025, alongside the report from the Corporate Director of Finance and Resources on the final budget proposals for 2025/26.
- 1.9 Cabinet will recommend a budget for approval at Full Council on Thursday 27 February 2025.
- 1.10 The Task Group seeks to act as a 'critical friend' and hopes to stimulate constructive debate on the Draft Budget 2025/26. We encourage the Cabinet to carefully consider our recommendations and take them forward.

2. Recommendations

- 2.1 The Budget Scrutiny Task Group makes the following recommendations to Cabinet:

Recommendation 1 – Leverage Strategic Community Infrastructure Levy (SCIL) for Optimal Community Benefit

The Task Group acknowledges the stringent regulations governing the allocation and spend of SCIL and is aware of the serious consequences that can arise from non-compliance, including legal challenges, potential loss of funding, and reputational damage.

However, rather than a coordinated, strategic approach, there appears to be a fragmented or 'piecemeal' approach to fund allocation. For instance, funding applications are approved on a case-by-case basis rather than through a structured prioritisation strategy with defined bidding windows. This disjointed process is hindering the efficient use of SCIL funds in alignment with the council's broader strategic priorities, limiting their potential impact to deliver critical infrastructure and community benefits.

The Task Group recommends that the council:

- **Review the current approach for allocating and spending SCIL that ensures better alignment with borough needs, a more balanced distribution of funds across borough plan priorities, and that facilitates creative investment into budgetary high-priority areas (e.g. key departmental budgetary pressure/ risk areas) as far as legally permissible and;**
- **Continue to advocate for local government finance reform that provides local authorities greater autonomy in generating, allocating, and spending their resources, including the flexible use of funds such as SCIL.**

Recommendation 2 – Enhance cost efficiency and value for money in Commissioning and Procurement

There is an increasing urgency for the council to identify and address any inefficiencies in commissioned contracts, actively seeking opportunities for cost reductions/streamlining.

The planned increase in employer National Insurance contributions, poses a significant risk, where partners, such as care providers, are likely to pass on these additional costs through higher fees to the council. Furthermore, some commissioned contracts and partnership initiatives have fallen short of delivering optimal value for money, highlighting the need for a careful assessment on how these contracts have been historically managed across the organisation. This involves evaluating the consistency and effectiveness of contract oversight within departments and at a council-wide level, and applying lessons learnt to develop a strengthened holistic approach moving forward.

Key policies, including the Procurement Strategy and the Social Value Ethical Strategy, remain outdated, a concern recently highlighted by the External Auditors, Grant Thornton, despite prior commitments for the council to review these documents on an annual basis. There is an opportunity to update these strategies to align with forthcoming changes in legislation and the 2023-27 Borough Plan, while also better integrating community wealth-building principles into council practices. This will foster a more equitable and sustainable local economy, presenting real opportunities for improving civic participation, strengthening local capacity, advancing social equity, fortifying local supply chains, and creating more job opportunities in the borough.

The Task Group recommends an urgent review of the council's procurement and commissioning processes to enhance its capacity to meet strategic objectives, maximise value for money, and, most importantly, ensure that the needs and perspectives of residents and service users are at the heart of service design. Specifically, we advocate that there should be a thorough exploration of 'participatory community wealth-building' practices, such as the use of community-led panels in defining commissioning and procurement priorities, determining service specifications, shaping community-led social value priorities, assessing tenders, and monitoring service performance, social value, economic and wider social impact. The suggested actions could uncover substantial savings, potentially offsetting some of the current financial pressures and reducing the need for further difficult decisions in future budgets. The review would also provide the newly established Strategic Commissioning and Capacity Building department opportunities to realign relationships, shared goals, and expectations with other council departments, partners, and service providers.

Recommendation 3 – Boost Investment in Debt Recovery

The Task Group is concerned by the council's relatively low collection rates, particularly for Council Tax and Business Rates, which raises broader questions about the effectiveness of its debt recovery strategies. A failure to effectively collect these debts not only impacts the council's immediate cash flow but also undermines long-term financial stability, potentially forcing the council to rely more heavily on external borrowing or diminishing government grant funding. It is acknowledged that a significant portion of outstanding debt may be uncollectable due to poverty and the ongoing cost of living crisis, which is likely to continue especially with the reduction to the Council Tax Support Scheme.

However, pursuing recoverable debts from those who simply are avoiding paying is crucial in maximising the council's income, which in turn strengthens the organisation's capacity to provide vital support services for those residents most in need in the borough. A strong debt recovery approach has the potential to generate substantial financial returns, improving financial management, enabling more accurate forecasting and budgeting, reducing dependence on reserves, and minimising the need for cuts to frontline services in future budgets.

The Task Group recommends that the council strategically prioritises and enhances investment in its debt recovery efforts to improve collection rates, specifically targeting those who are avoiding paying.

Recommendation 4 – Strengthen Financial Reserves

The Task Group commends the council for its strong track record of financial resilience, and notes achievements such as £3m in cost avoidance resulting from effective spending controls. The challenging financial circumstances facing the council are also understood. Dwindling reserves are primarily attributed to a lack and uncertainty in government funding, as well as unprecedented homelessness and TA pressures, rather than financial mismanagement, highlighting the need for urgent reform. Additionally, matters have been exacerbated by increased operational costs due to prolonged periods of high inflation, elevated interest rates, and a surge in demand driven by demographic changes, especially in areas such as social care and housing.

At the same time, The Task Group echoes the concerns raised by the External Auditors regarding the depletion of reserves. The ongoing reliance on useable reserves to deal with unplanned expenditure poses a significant risk to the council's long term financial sustainability. This concern is further heightened by additional factors, such as the potential need to use General Fund reserves to cover the council's Dedicated Schools Grant (DSG) deficit if central government ends the statutory override that currently allows local authorities to hold deficit balances. With the override set to expire by 2026/27, this situation could push the council to seek Exceptional Financial Support from central government.

The Task Group recommends that the council prioritises rebuilding strong financial reserves, particularly the general reserves and Housing Revenue Account (HRA) reserves, as a core component of its short and medium-term financial planning, while enhancing spending controls to reduce costs.

Recommendation 5 – Effective Implementation of Task Group Recommendations

While the Task Group is pleased to note that the majority of recommendations submitted to Cabinet on previous draft budgets have been accepted, issues remain regarding the consistency of implementation. Despite receiving written assurances from Cabinet on progress through the RPR Committee's scrutiny recommendations tracker, the group has observed instances where implementation has fallen short of expectations. For example, the recommendation from last year's Budget Scrutiny Task Group Review to strengthen partnership working with the Voluntary and Community Sector (VCS) has not been fully realised. A recent meeting with key VCS organisations confirmed a lack of consistent dialogue throughout the financial year on crucial issues like the upcoming budget. This pattern of belated engagement with the VCS, where budget discussions occur after draft proposals have already been published, continues to be a concern. Additionally, the Cabinet's previous commitment to clearly outline the climate and environmental implications of each budget proposal, as recommended last year, appears to have been inadequately addressed. This is evident in draft proposals such as NR01 25-26, which notably omit these critical considerations.

The Task Group recommends that the Cabinet establish a robust monitoring process to ensure effective implementation of accepted Task Group recommendations.

Enhanced monitoring processes will promote greater accountability and public trust in council decision-making, helping to minimise disruptions resulting from changes in Cabinet portfolios and organisational shifts within the organisation.

3. Evidence Sessions

- 3.1 The Budget Scrutiny Task Group conducted a series of meetings with the Cabinet, the Corporate Management Team, and key partners to assess the viability of the Draft Budget 2025/26 to inform its recommendations.
- 3.2 During the process, the group also examined key documents, including:
- Quarter 2 Financial Forecast 2024/25²
 - Quarter 3 Financial Forecast 2024/25³
 - Draft Budget 2025/26 (inclusive of the revised Medium Term Financial Outlook and the additional budget proposals for 2025/26)⁴
 - Strategic Risk Register⁵
 - Draft Consultation and Engagement Plan

Work Planning Session

- 3.3 This meeting was held on 24 October 2024.
- 3.4 Task Group members discussed and agreed the approach to be taken to scrutinise the Draft Budget 2025/26. This consisted of:
- A stakeholder session with key VCS partners to analyse the budget proposals and temperature check the impact and assumptions that sit behind them
 - An evidence session to review the council's approach to Treasury Management and borrowing; as well as its updated Medium Term Financial Outlook, and the budget proposals put forward for the following directorates: Finance and Resources, Law and Governance, Neighbourhoods and Regeneration, and Partnerships, Housing and Resident Services
 - An evidence session on the remaining proposals for the Community Health and Wellbeing, and Children and Young People directorates
 - A final evidence session to share reflections, hear any additional evidence and to discuss and agree the draft recommendations

²Q2 Financial Forecast 2024/25 Report (November 2024):
<https://democracy.brent.gov.uk/documents/s145713/08.%20Q2%2024-25%20Financial%20Report%20-%20Scrutiny.pdf>

³ Q3 Financial Forecast 2024/25 Report (January 2025):
<https://democracy.brent.gov.uk/documents/s146852/08.%20Q3%202024-25%20Financial%20Report.pdf>

⁴ Draft Budget 2025/26 (November 2024):
<https://democracy.brent.gov.uk/ieListDocuments.aspx?CId=455&MId=7982>

⁵ Strategic Risk Report (October 2024):
<https://democracy.brent.gov.uk/documents/s145581/05.%20Strategic%20Risk%20Update%20-%20September%202024.pdf>

3.5 The following areas and themes were identified for review:

1. Brent Council's **Medium Term Financial Outlook**, including the overall financial position.
2. **The impact of inflation** on Brent Council's budget pressures and performance.
3. **The impact of rising interest rates** on Brent Council's budget pressures and performance.
4. **The impact of the uncertainty in central government funding** on Brent Council's operations and performance.
5. **The impact of the ongoing conflicts in Ukraine and the Middle East** on Brent Council's budget pressures and performance.
6. **The impact of the Cost of Living Crisis** on Brent Council's budget pressures and performance.
7. **The impact of Covid-19** on Brent Council's budget pressures and performance.
8. Ringfenced budgets e.g. **HRA, Schools and the DSG**, and the **Public Health Grant**.
9. The **Capital Programme** of the council.
10. Council **reserves** and the **Reserves Strategy**
11. Key departmental **overspends and underspends**
12. **Service Specific Pressures, Risks, Uncertainties, and Mitigations**
13. **Current/future budget assumptions** e.g. income assumptions, spending assumptions etc.
14. The **proposed budget setting process for 2025/26**
15. **The impact of budget proposals for 2025/26** on service delivery and customer satisfaction
16. **Council Tax** and Council Tax Support Scheme
17. Business Rates
18. Options for **Income Generation**
19. **Treasury Management** e.g. investments, borrowing, minimum revenue provision (MRP) etc.
20. Budget **Consultation**

Stakeholder Session

3.6 This meeting was held on 25 November 2024 with colleagues from the VCS (a full list of participants in the Budget Scrutiny Task Group Review is outlined in section 6 of this report).

3.7 The Deputy Director of Finance opened the session with a scene-setting overview of Brent's current financial situation. The economic environment was described as volatile and uncertain, whereby the council had already made £222 million in cuts since 2010 with a further £16 million in cuts and operating efficiencies being proposed for 2025/26 to set a legally balanced budget. This is in addition to the proposed 4.99% increase to Council Tax (consisting of a 2.99% general increase plus 2% for the Adult Social Care Precept).

3.8 Key financial risk areas highlighted included:

- Inflationary and interest rates pressures
- Uncertainty and insufficient central government funding:
 - Single-year funding settlements, hindering long-term financial planning

- Declining core funding from central government (down 20% in the past 14 years) coupled with an 11% population increase, resulting in a 28% reduction in real terms funding per person since 2010 etc.
- Homelessness and TA pressures:
 - Increased demand and reduced supply of suitable housing
 - Increased reliance on high-cost accommodation options
 - Housing subsidy loss
 - Social care pressures:
 - Staff recruitment and retention challenges
 - Rising demand for services, driven by demographic changes
 - Escalating contractual costs
- 3.9 The Task Group then proceeded to gather feedback from partners on the proposals, identifying any potential concerns, gaps, and/or opportunities in the Draft Budget 2025/26. They also sought to understand stakeholder experiences, challenges and priorities in the context of the current economic environment, while exploring where they believe council investment should be targeted in the coming year and beyond.
- 3.10 Areas of discussion included:
- **Proposed 4.99% increase in Council Tax and reduction to Council Tax Support Scheme:** These proposals are likely to negatively affect residents' ability to maintain stable housing, particularly those in employment who are already struggling financially. While alternative financial support options will be available for residents facing hardship, it is still very likely that there will be a decline in Council Tax collection rates. Council Tax is already a major source of debt for many service users, and if these proposals proceed, demand for support is likely to increase significantly. This growing need must be carefully managed in close collaboration with the VCS to ensure it can adequately meet growing demand. Nonetheless, it would have been helpful for the council to have engaged the sector ahead of the publication of the draft proposals to enhance its planning efforts for the likely increased demand it will experience.
 - **1.2% increase to employer's national insurance contributions:** There are anxieties that the VCS may have to absorb these additional costs while also implementing the London Living Wage increases, navigating heightened competition for charitable funding, and increased demand for support. Thus, there is an imminent need for the council to work closely with the sector to implement timely and effective mitigations/solutions, ensuring that service cuts or delays are prevented. Engagement should not be limited to Brent CVS but should also involve direct consultations with local organisations that possess the diverse knowledge and expertise needed to develop tailored solutions in alignment with the council's strategic priorities.
 - **SCIL:** The current underutilisation of SCIL funds should be addressed to better align with local needs, ensure a more balanced distribution across borough plan priorities, and enable targeted investment into high-priority budget areas. This will need to continue to be in accordance with current regulations. Similarly, there is a pressing need to intensify lobbying efforts for local government financial reform that grants local authorities' greater autonomy over spending decisions (such as more flexible use of SCIL funds). Positive changes in this area could help local authorities

minimise future budget cuts that would severely impact both the sector and local residents.

- **Clarity in proposals:** As highlighted last year, there is a need for the council to better communicate the potential impact and expectations of proposals on both residents and partners. A key example is proposal CHW02 25-26 ('Modernise Adult Social Care Approach to Assessment and Review'). While the prospect of community-based assessments holds significant potential for positive outcomes if implemented effectively, the proposal lacks clarity on whether voluntary and community sector partners are expected to conduct the assessments on behalf of the council, or if the process will be a collaborative effort.
- **Alignment with strategic priorities in the Borough Plan 2023 – 27:** As noted in previous years, the draft budget for 2025/26 lacks full alignment with the priorities/commitments set out in the Borough Plan. For instance, climate change and environmental considerations are absent from several proposals. Despite cabinet assurances that additional screening would be implemented to outline climate and environmental impacts, this is still not explicit. A notable example is proposal NR01 25-26 ('Increase the charge for accessing the bulky waste collection service from £40 to £55'), which could potentially lead to higher rates of fly tipping across the borough.

3.11 It was highlighted that council investment should be prioritised in:

- **'Invest to Save' initiatives:** Noting the growing ageing population, an example could be greater investment into preventative services, which evidence shows could lead to longer-term savings and improved outcomes.
- **Single Homelessness Prevention:** Although homelessness and the demand for TA are widespread challenges faced by many authorities, Brent provides temporary housing to a significantly low proportion of verified rough sleepers. To effectively address the rising number of rough sleepers in the borough, additional investment in single homelessness services is essential.
- **Strengthening partnerships with the VCS:** The sector possesses valuable local knowledge and the business acumen to develop successful funding bids for service provision and could assist the council in its income generation efforts (e.g. through joint grant applications). The council should therefore treat the VCS as an equal partner and work more closely with them to co-design and transform services, especially considering the financial pressures faced by both the council and the sector. A starting point for this collaboration could involve reviving the thematic groups⁶ to revisit the draft proposals. This would allow exploration of additional income opportunities and ways to mitigate the impact of proposed changes on the sector, such as identifying alternative funders or service providers for services at risk of reduction or elimination. Going forward, it is essential that discussions with the VCS regarding proposals that may directly or indirectly affect them take place well in advance of the publication of draft budget proposals. This collaborative approach will ensure that the sector has a voice in the decision-making process and can effectively plan for any anticipated increase in demand.

⁶ For further details on the thematic groups, please refer to the Brent Voluntary and Community Sector Report (May 2021): <https://democracy.brent.gov.uk/documents/s110101/7.%20Brent%20Voluntary%20and%20Community%20Sector.pdf>

Evidence Session 1

- 3.12 This meeting was held on 28 November 2024.
- 3.13 Key participants included the Leader, Deputy Leader and Cabinet Member for Finance and Resources, Cabinet Member for Public Realm and Enforcement, Cabinet Member for Climate Action and Community Power, Cabinet Member for Safer Communities, Jobs and Skills, Cabinet Member for Housing and Resident Services, Chief Executive, Corporate Director - Finance and Resources, Corporate Director - Law and Governance, Corporate Director - Partnerships, Housing and Resident Services, Director - Public Realm, Director - Inclusive Regeneration and Employment, Deputy Director of Finance, and Head of Revenues and Debt.
- 3.14 Following a scene-setting presentation from senior officers on the current financial situation, which sparked constructive debate on key strategic areas of council business, the Task Group undertook a thorough review of budgetary matters within the following directorates:
- Finance and Resources
 - Law and Governance
 - Neighbourhoods and Regeneration
 - Partnerships, Housing and Resident Services

Scene-Setting

- 3.15 The Task Group was presented with a stark picture of the council's precarious financial position:
- **A volatile economic climate, creating mounting financial strain:** High inflation, increased service demand, and ongoing government funding cuts have created significant budgetary pressures for the organisation. Significant overspends, primarily driven by escalating costs in TA and social care, have depleted reserves.
 - **Limited relief from government support:** While the Autumn Statement provided some funding, it falls short of addressing the full extent of social care and homelessness pressures. The impact of the National Insurance Contributions increase remains uncertain.
 - **Urgent action required:** Spending controls have been implemented, achieving £3 million in cost avoidance. Additionally, a £10 million in-year savings target is in place, and further savings of £16 million are proposed for 2025/26. A 4.99% Council Tax increase is also recommended to balance the budget.
 - **Risk of financial collapse:** Continued service pressures without significant reform to local government funding could lead to an Emergency Financial Support situation within five years.

Key Budget Assumptions:

- 3.16 The Task Group discussed and sought clarity on the robustness of budget assumptions made in the Draft Budget 2025/26 and revised Medium Term Financial Outlook.
- 3.17 The Corporate Director of Finance and Resources highlighted the success of prior forecasting efforts, outlining the scenario modelling and sensitivity analysis performed

before the release of the draft budget. This process involved a detailed examination of the current costs, drivers, and requirements of each directorate, as well as close collaboration with external experts to ensure the accuracy of the modelling approach.

- 3.18 The core assumptions were grounded in the information available to the council at the time of formation and would be reviewed as needed, such as following the release of the Provisional Local Government Finance Settlement. It was also noted that, although these assumptions had proven reliable in the past, areas of overspending would continue to present challenges for forecasting. For instance, predicting costs in areas like children's services remains particularly difficult, as even a single additional child requiring support can lead to a substantial rise in cost pressures.

Cumulative impact of budget cuts to date:

- 3.19 The Task Group expressed concerns about ongoing staffing reductions, particularly the deletion of vacant positions, and questioned how the council was balancing the need for resource efficiency with the potential long-term effects of overburdening staff and impacting staff morale. In response, detail was provided on the strategies used to manage organisational transformation, staffing reductions, voluntary redundancies, natural turnover, and levels of sickness. Emphasis was placed on the critical role of managers/senior leaders in maintaining staff motivation and offering support, including the need to engage with staff about the challenges and opportunities facing the council. The use of staff surveys to monitor and address potential demotivation was also highlighted.
- 3.20 More broadly, scrutiny members raised concerns about the cumulative impact of past cuts on local communities and the lack of access to this information during the review. It was emphasised that the council needs to better understand the wider, long-term consequences of budget cuts since austerity in order to effectively manage the present and plan for the future. By examining the historical context of cuts, the council could avoid short-term fixes that merely postpone or worsen the consequences of past decisions, and instead prioritise longer-term solutions, leading to sustainable financial strategies and more strategic resource allocation and investment across the organisation. The need for an audit of cumulative impacts of past cuts was acknowledged, though it was not a current priority. The primary focus remained on addressing the immediate financial challenges. Any future review of past budget decisions would only be pursued if backed by a robust cost-benefit analysis, and would be more relevant if the council were to secure multi-year funding agreements.

Reserves:

- 3.21 The Task Group raised concerns regarding the depletion of available reserves, and queried how these would be rebuilt as part of the budget setting strategy for 2025/26. This is especially the case as current reserve levels are unlikely to provide sufficient financial flexibility to respond effectively to unexpected emergencies. In response, it was emphasised that replenishing reserves was critical, with plans to use any one-off funding to support this. Other strategies under consideration include making additional savings or allocating extra government grants to reserves instead of the base budget. However, this approach is not sustainable, and the Cabinet will continue lobbying for changes to the funding formula, with key discussions expected in Spring 2025. The outcome will influence future decisions on service delivery and funding.

Fees and Charges:

- 3.22 The Task Group explored how the council will ensure transparency and justify any significant increases to essential service fees and charges. Scrutiny members suggested that any increases should be strategically targeted towards commercial entities rather than residents. Officers acknowledged this perspective while emphasising the legal constraints on fee increases, which are limited to cost recovery without generating profit. Consequently, the focus was on striking a balance in setting fees and charges to ensure they remain affordable while adequately covering departmental costs for service delivery.

Unlocking Potential: Innovation, Efficiency, and Investment Strategies:

- 3.23 Concerned by the lack of long-term, innovative cost-saving measures in the Draft Budget 2025/26, the Task Group examined approaches that could help the council adjust its savings plans, generate new income, and alleviate current financial pressures through creative and collaborative solutions.

'Invest to Save':

- 3.24 Further clarification was requested regarding the council's investment strategy, with a particular focus on its 'invest to save' approach (i.e. measures to save the council more money long term and to prevent prevailing issues escalating out of control).
- 3.25 The Corporate Director of Finance and Resources explained that the investment strategy had two components: investment in services for transformation and investment of cashable money for returns. Regarding the latter, the Task Group received assurances that the council regularly reviewed its treasury management strategy, balancing cash balances, borrowing, and investments. Over the past 10-15 years, the council had used internal borrowing, utilising SCIL money to delay external borrowing. This approach was prudent given the higher cost of borrowing compared to savings rates. Nonetheless, it was reiterated that the council had not pursued highly ambitious investments due to the associated risks and lack of expertise in making profitable returns. Examples of failed investments by other councils were cited, highlighting the importance of caution. The council's focus remained on building social housing, which offers long-term benefits beyond financial returns.
- 3.26 The Task Group endorsed the above-mentioned approach, but emphasised the need for increased council investment in preventive and innovative measures that will yield long-term cost savings, similar to last year's budget. Planned initiatives, such as the forthcoming council-owned children's home, were highlighted as key examples of this strategy in action.

SCIL:

- 3.27 The Task Group revisited previous conversations about whether the council had explored opportunities to use SCIL funds to help address budgetary challenges. In response, it was highlighted that the council had taken a cautious stance on using SCIL funds to ensure adherence to strict legal regulations, and consequently had not actively sought opportunities to incorporate these funds into the draft budget. However, the potential for leveraging SCIL funds to support climate action initiatives was identified as an area worthy of exploration moving forward.
- 3.28 While scrutiny members acknowledged the importance of a cautious approach, it maintained that the council could do more to strategically utilise SCIL funds as part of

its investment strategy. It was therefore proposed that the Cabinet focus on determining priority investment areas in line with the borough plan and local needs, rather than relying on a reactive and fragmented approach where departments submit individual applications for SCIL funding sporadically.

Insourcing:

- 3.29 Further inquiries were made around whether the council should pursue insourcing opportunities, highlighting risk factors such as the 1.2% increase in National Insurance contributions to employers. Officers acknowledged this challenge, expressing concern about the lack of government announcement on funding allocations and the potential cost burden on the council, particularly in social care. Nonetheless, any new government funding might have to be used to offset any uplifts to contracts although this would not cover demand or complexity in cases.
- 3.30 It was noted that insourcing services that are not currently within the council's core service delivery may not be practical due to resource constraints. This could involve significant investments in new staff, training, and infrastructure, with the risk of cost overruns. While acknowledging this concern, scrutiny members advocated for a standard practice of evaluating the feasibility of insourcing during contract renewals. This proactive approach enables a comprehensive evaluation of both the potential benefits and potential drawbacks.

Grant Funding:

- 3.31 The Task Group sought information about the council's success in securing and maximising grants over the past year, and whether more opportunities could be realised in this area to increase income. In response, it was stated that the council had been successful in obtaining grants, with ongoing efforts to secure additional funding mentioned, particularly for environmental initiatives such as tree planting. Scrutiny members commended this work and encouraged continued proactive efforts to secure grant funding, which was in alignment with previous recommendations, such as exploring match-funding and joint bids.

Consultation and Engagement:

- 3.32 The Task Group welcomed the opportunity to review the draft Communications and Engagement Plan for the 2025/26 Budget consultation in early October 2024. However, following discussions with key partners from the VCS in November 2024, additional areas for improvement were identified.
- 3.33 Feedback from group's stakeholder session revealed that the discussion was the first instance in which the VCS were consulted on the Draft Budget 2025/26. This raises concerns, as the budget-setting process (alongside relevant consultation efforts) should be led by the executive rather than scrutiny. A gentle reminder was issued regarding the Cabinet's commitment to engage the VCS in the budget-setting process as early as possible and throughout the financial year, rather than waiting until draft proposals are published, as often the sector is a majorly affected party.
- 3.34 The respective cabinet member committed to addressing these gaps in engagement. It was mentioned that Brent CVS was under review/transition, and the aim was to improve capacity and engagement with the wider VCS moving forward, leading to better outcomes. The Task Group welcomed this but stressed the need for direct engagement to also take place with a variety of organisations from the sector to leverage their local knowledge and expertise. This would also enable greater

opportunities to access joint external funding opportunities. Individual VCS organisations were eager to collaborate on solutions from January 2025 onwards.

HRA:

- 3.35 The Task Group raised concerns about the significant challenges facing the HRA, emphasising the need for a robust plan to ensure its long-term financial sustainability.
- 3.36 The Corporate Director of Partnerships, Housing and Resident Services acknowledged the apprehensions raised, noting a £90 million reduction to the 30-year business plan. This shortfall had made development projects for council-owned TA no longer financially viable. The cost-of-living crisis had driven up repair expenses, with material prices having significantly increased, while the council couldn't raise rents beyond the statutory limit, which lagged behind inflation. Compliance with new legislation, such as fire safety regulations, further strained finances. Additionally, the HRA's limited reserves, at only £2.4 million (4% of gross rent), fall significantly below the 5% target and the Brent peer average. These reserves are projected to remain low over the next five years and could be depleted by the planned re-procurement of the repairs contract. This is particularly concerning given the need for substantial investments in fire safety, property retrofitting, the tower block programme, and affordable housing within the borough, as just a few to mention.
- 3.37 Recognising the need to make difficult decisions to re-appraise HRA budget priorities and service delivery methods to achieve a balanced budget, scrutiny members stressed the importance of enhanced oversight of the HRA by the CWB Scrutiny Committee going forward.

Capital Programme:

- 3.38 The Task Group acknowledged the uncertainty within the capital programme and requested additional information on the impact and mitigations of key risks, including interest rate fluctuations, potential increases in borrowing costs, growing demand for affordable housing, and project delays.
- 3.39 Scrutiny members sought assurances on how value for money would be ensured in building schemes and how the council would be protected from unexpected remedial costs due to potential defects. In response, it was emphasised that value for money is a priority, balanced with factors like contract suitability and competition (e.g. providing offers that would attract developers to bid on contracts etc). Additionally, it was explained that the council retains 2.5% of contractors' monthly invoices for financial protection against defects. Half of this retention is released after practical completion, with the remainder held during a 12-month defects liability period to address any issues.

Finance and Resources

- 3.40 The Task Group were satisfied that the directorate's proposals minimised any potential negative impact on residents as much as possible. If any new information emerges, it should be clearly reflected in the details of the relevant proposals.

Law and Governance

Outsourcing the provision of Occupational Health services:

- 3.41 The Task Group queried the council's plans to mitigate the risk of reduced responsiveness and/or longer waiting times once the service is outsourced, specifically querying the measures to ensure urgent cases were prioritised appropriately.
- 3.42 The concerns raised were acknowledged by the Corporate Director of Law and Governance, with the emphasis that the reliability of outsourced services hinges on the specifications and terms outlined in the future contract. It was noted that effective contract monitoring, supported by clear performance metrics, is essential to ensure timely responses and the swift resolution of urgent cases.
- 3.43 Scrutiny members questioned whether the council had considered alternative delivery models, such as shared service arrangements with other local authorities. In response, it was highlighted that there had been no interest in pursuing a shared service for occupational health services, as most councils prefer to commission these services from external providers. This approach helps councils avoid additional costs, such as pension liabilities.

Deletion of two trainee positions:

- 3.44 The Task Group enquired about the potential impacts of this proposal, specifically the impact on the long-term capacity and expertise within the legal department, and the steps being taken to ensure that the current workforce can manage the increased workload whilst maintaining the quality of service it offers. In response, it was highlighted that the council would utilise the apprenticeship levy to fund qualifications for existing legal assistants to pursue qualifications that will lead to solicitor roles, ensuring long-term skills and expertise in the department. Additionally, cross-training programmes and participation in the London Boroughs Legal Alliance's training programmes would be a measure utilised to uphold continuous development and service quality within the department.

Neighbourhoods and Regeneration

Increased charge for accessing the bulky waste collection service:

- 3.45 The Task Group observed that the council currently charges significantly less for bulky waste collection compared to neighbouring boroughs. They questioned whether comparisons had been made with boroughs like Harrow, which charge similar fees to the proposed increase, in order to project potential additional income and assess whether the proposal is financially sound and worthwhile. In response, the Cabinet Member for Public Realm and Enforcement confirmed that the fees for this service in neighbouring boroughs had been reviewed prior to submitting this proposal. For transparency, it was clarified that the decision to increase fees for bulky waste collection has since been agreed to be taken as an early in-year saving. This means this proposal will push ahead and will no longer be a part of the current budget consultation.
- 3.46 Scrutiny members asked questions about whether any concessions were available to support individuals with lower incomes who might struggle to afford the service. In response, it was clarified that a range of concessions were already in place to meet the needs of those with low incomes and would continue to be offered. The Task Group stressed the importance of improving communication to raise awareness of these

concessions. Additionally, the group encouraged the cabinet member to consider further options for a tiered system, including lower cost single-item collections (such as for small items like microwaves and air fryers), in order to reduce the risk of fly-tipping and provide more affordable and accessible disposal options for items that cannot be discarded through traditional means.

Increased garden waste annual subscription:

- 3.47 The Task Group enquired about the forecasted figures around the potential loss of subscribers as a result of the increased subscription fee. In response, it was highlighted that the subscription service was utilised by residents who had a genuine need for it, as they had gardens that required maintenance. Given that residents have consistently remained loyal despite previous increases in fees, it is expected that the subscription rate will not see a significant drop. Historical data supports this expectation, as the annual fee has risen from £40 to £65 over the years, yet the number of subscribers has remained stable at around 20,000. The department was therefore confident that a small increase in the subscription fee will have minimal impact, especially since the increase is aligned with neighbouring boroughs. This adjustment will allow the council to maintain a high-quality service without compromising its standard.
- 3.48 Scrutiny members noted the response provided and stressed the need for climate and environmental considerations to be included under this proposal, as well as other relevant proposals. The Cabinet member for Climate Action and Community Power accepted this feedback, committing to rectifying this information in the proposals.

Staffing and Structures Review of Public Realm, Regeneration, and Strategic Housing:

- 3.49 Additional details were requested on what the saving entailed and the impact on service delivery. It was clarified that this proposal related to ongoing restructuring within the directorate, including a voluntary redundancy programme. This presented positive opportunities to review and reorganise frontline teams to better serve local community needs, with further options identified to improve service delivery. It was stressed that the overall impact on the service would remain manageable.

Staffing efficiencies and contract spend within the Shared Technology Service:

- 3.50 The Task Group expressed concerns about the potential impact of this proposal on cybersecurity, given its significant position on the strategic risk register, and requested more information on how the council plans to maintain the security and resilience of its IT infrastructure. In response, it was mentioned that cuts were proposed to staffing and services, not to infrastructure and resilience, ensuring that the safety and security of the system would remain intact, supported by a recent £10 million capital investment.
- 3.51 Scrutiny members tasked the respective cabinet member to continue discussions with Lewisham and Southwark to gain a deeper understanding of the consequences of losing staff, as well as any potential impacts on long-term insight and data-driven services.

Partnerships, Housing, and Resident Services

Council Tax Support Scheme Reduction:

- 3.52 Scrutiny members sought additional clarity on the reasoning behind the preferred option for reforming the scheme. Further details were also requested on the measures

being implemented to protect the most vulnerable residents and ensure that they are not disproportionately impacted by any changes. In response, the Cabinet Member for Housing and Resident Services emphasised that the council had no choice but to implement this proposal, as avoiding it would require finding £5 million in cuts elsewhere, potentially leading to the closure of libraries and other essential support services (e.g. Family Wellbeing Centres). Nonetheless, alternative support would be provided, such as through the Resident Support Fund and the new Brent Hubs model in collaboration with the New Horizon Centre, aimed at helping residents manage debt and access employment opportunities and other forms of support. Additionally, the council would carefully monitor payments and proactively reach out to residents who accumulate debt quickly to connect them with the appropriate assistance.

- 3.53 The Task Group acknowledged the cabinet member's remarks, noting that Brent's current Council Tax Support Scheme is among the most generous in London, ranking in the top four. However, due to the ongoing financial challenges, continuing the scheme in its current form is unsustainable. The group stressed the urgent need to effectively engage the VCS to help them prepare for a likely surge in inquiries should the proposal move forward. Clear and comprehensive communication was also identified as crucial to ensuring residents in genuine need are fully informed about any changes to the scheme and alternative support options, maximising their access to eligible benefits. Additionally, scrutiny members called for the withdrawal of the proposed administrative change limiting backdating of Council Tax Support to one month, expressing concerns it could unfairly disadvantage new working-age residents and increase hardship for those unable to claim in time.

Debt Recovery:

- 3.54 The Task Group raised concerns about the department's debt recovery efforts, highlighting the current collection rates for Council Tax and Business Rates. Scrutiny members questioned the planned measures to generate additional income, specifically from those who can pay but won't, as opposed to those who genuinely cannot pay. The Head of Revenue and Debt acknowledged the need for improvements, with a review underway aimed at enhancing collection rates through ethical debt collection practices. A new online portal is being introduced to streamline processes and allow staff to focus on more effective debt recovery.
- 3.55 While the Task Group noted these developments, it is strongly believed that a more substantial investment is required in debt recovery, particularly for Council Tax and Business Rates, in order to unlock significant potential for increased revenue. For example, a 4% increase in in-year Council Tax collection, returning to pre-pandemic levels, could generate an additional £7.2 million in income.

Evidence Session 2

- 3.56 This meeting was held on 2 December 2024.
- 3.57 Key participants included the Deputy Leader, Cabinet Member for Community Health and Wellbeing, Cabinet Member for Climate Action and Community Power, Cabinet Member for Children, Young People and Schools, Corporate Director – Community Health and Wellbeing, and Corporate Director – Children and Young People.
- 3.58 The Task Group undertook a deep dive exercise into budgetary matters within the following directorates:

- Community Health and Wellbeing
- Children and Young People

Community Health and Wellbeing

Commissioning and Procurement:

- 3.59 Given the significant financial pressures within the directorate, the Task Group questioned the department's efforts to drive efficiencies through commissioning and procurement, both within the service and across the wider council, in order to generate additional income and achieve cost savings. In response, it was mentioned that related work is currently underway, and is expected to be reported to the RPR Committee in February 2025. It was stressed that substantial strategic savings could take time to materialise.

Reablement Service:

- 3.60 Clarity was provided to the Task Group that by expanding the cohort of individuals entering reablement by including mental health and learning disability users, the outcome would be an enhanced quality of life with increased independence effectively leading to improved physical and mental wellbeing. Therefore this saving was constructive in terms of encouraging residents to remain independent (if appropriate) and reducing their reliance on long-term care services currently provided by the council.

Modernising the Adult Social Care approach to Assessment and Review:

- 3.61 The Task Group raised concerns about the accessibility implications of this proposal and asked how the council planned to mitigate the risks of people falling through the net and not receiving the assistance they needed. In response, it was explained that the council was planning to adopt a mixed model for assessments, using community-based assessments and technology for reviews. Additionally, the council is already using a risk model at the initial contact point which measured many factors, including levels of urgency.
- 3.62 Scrutiny members acknowledged the assurances given by both the cabinet member and corporate director, and mentioned that feedback on the proposal from the stakeholder session was largely positive. However, they stressed the importance of council staff leading community-based assessments alongside partners, rather than solely relying on partners to fulfil these responsibilities.

Implementation of Telecare Service Charges:

- 3.63 The Task Group raised concerns about the impact of charging for telecare services and the technology offered. In response, the Cabinet Member of Community Health and Wellbeing emphasised the importance of income generation, noting that telecare services should be part of a financial assessment if included in a care package. It was clarified that the charges, ranging from £3 to £4 per week, were for existing services and that the charge would help offset the cost of providing these services. The group were also notified that other authorities were charging up to £5 per week.

Children and Young People

Reduction in weekend use of the Gordon Brown Centre:

- 3.64 The Task Group discussed the negative consequences of reducing weekend use of the Gordon Brown Centre for care leavers. A key concern was that this change would result in longer waiting times for young people, which could significantly impact their ability to develop the confidence and skills necessary for independent living. In response, it was reported that since the proposal was put forward, £80k additional funding for the centre had since been secured from Settle and the John Lyon's Trust. Therefore, the impact of such a decision would not be as severe as initially anticipated.
- 3.65 Scrutiny members applauded the idea of securing external funding, and on a related note, proposed collaborating with other authorities to pool resources for future joint funding bids as a means of alleviating budget pressures. The Corporate Director of Children and Young People concurred and highlighted successful existing collaborations, such as the joint fostering programme with West London authorities. It was suggested that these practices be shared with other council departments to foster further collaboration and improve service delivery across the organisation.

Reduction in discretionary spend when supporting children and families:

- 3.66 While welcoming the continued use of discretionary funding to support young people in emergency situations, including transport costs, the Task Group emphasised that Brent should not be responsible for funding that is the responsibility of other agencies. Moving forward, effective scrutiny will be crucial to ensure that these funds are used effectively and collaboratively with other agencies.

Cease the Safe Base Brent offer:

- 3.67 The Task Group questioned the proposal to discontinue the Safe Base Brent offer, expressing concern that alternative support from university mental health services and organisations such as Kooth might not sufficiently address the unique needs of care leavers. For instance, the current offer includes support from an educational psychologist providing enhanced, tailored support and regular check-ins to young people in need. These concerns were acknowledged by the Cabinet Member for Children, Young People and Schools. A commitment was made to closely monitor the impact of this decision, reporting progress back to the Community and Wellbeing Scrutiny Committee at a later date.

Final Evidence Session

- 3.68 This meeting was held on 16 December 2024.
- 3.69 Key participants included the Leader, Deputy Leader and Cabinet Member for Finance and Resources, Chief Executive, Corporate Director - Finance and Resources, Deputy Director of Finance, and Deputy Director - Investment and Infrastructure.
- 3.70 At this meeting, the Task Group discussed and agreed the provisional recommendations that were likely to be presented to Cabinet and Full Council, based on all of the evidence heard to date.
- 3.71 For transparency purposes, it was noted that potential amendments and changes to the provisional recommendations may be made after further review and consideration

of additional evidence beyond this meeting. Any such revisions will be included in the final report.

3.72 Final recommendations can be found in section 2 of this report.

4. Other Meetings

- 4.1 Outside of the sessions detailed in section 3, the Chair of the Budget Scrutiny Task Group met with the Independent Chair of the Audit & Standards Advisory Committee and the Chair of the Audit & Standards Committee to seek further intelligence, clarity, and assurances on the evidence provided by cabinet members/council officers as part of the Budget Scrutiny Task Group Review.
- 4.2 In addition, the Chair hosted a drop-in session for local councillors to share their thoughts and insights on the Draft Budget 2025/26.

5. Conclusion

- 5.1 The Task Group commends the council for its resilience in maintaining a prudent financial position amid the significant challenges of economic turmoil, ongoing austerity, financial uncertainty, and increased demand for support. Recognising the difficult choices that have been made in the Draft Budget 2025/26 to set a legally balanced budget, without significant reform to local government finance, the authority risks becoming financially unstable in the near future. This could eventually lead to the need for emergency assistance from central government – a consequence already experienced by many other local authorities.
- 5.2 The recent change in government presents a crucial opportunity to advocate for a more sustainable funding model for local authorities, essential for long-term financial health and specifically for addressing critical areas like housing and social care. This necessitates persistent lobbying efforts, such as for the adoption of place-based budgeting approaches, and increased local control over budget allocation and spending, including the flexible use of the Strategic Community Infrastructure Levy (SCIL).
- 5.3 We are hopeful that, through the strategic change programme, the council will strive to minimise the impact of budget cuts on residents and partners as much as possible. By focusing on building a stronger local economy – in other words 'community wealth building' – the organisation can mitigate the impact of cuts on residents and partners by creating sustainable, long-term opportunities for growth, job creation, and financial resilience, ensuring that local communities remain empowered and economically stable even in challenging times. To achieve this, the council must think differently, embracing a new approach that harnesses Brent's strengths, re-evaluates priorities, and explores innovative solutions to address current and emerging challenges. To this end, we encourage the council to prioritise 'invest to save' initiatives, explore innovative revenue streams, and actively engage residents in co-creating solutions that address their needs and priorities, ensuring that their voices are central to shaping the future of the council.
- 5.4 Echoing previous sentiments, strengthening partnerships with the VCS is equally important for addressing the challenges ahead. As the sector plays an increasingly

vital role in service delivery—especially as the council faces continued budget cuts and relies more on the VCS to support residents—it's important to develop a collaborative strategy that ensures the continued provision of high-quality services for the benefit of residents. By working closely with the VCS, the council can leverage their expertise through joint funding bids, co-designing services, and identifying sustainable alternatives, ultimately improving service delivery and enhancing the financial resilience of both the council and the VCS.

- 5.5 The Task Group supports the Draft Budget 2025/26, subject to the outcomes of the final consultation and the acceptance of the recommendations outlined in section two of this report. This report is not the end of the budget scrutiny process and we look forward to discussing our recommendations and the budget as a whole at future meetings.

6. Participants

The Task Group would like to thank the following members for giving up their time to take part in this scrutiny process, and also to the many council officers who worked extremely hard to support and provide us with information and advice when needed:

- Councillor Muhammed Butt – Leader of the Council
- Councillor Mili Patel – Deputy Leader and Cabinet Member for Finance & Resources
- Councillor Jake Rubin – Cabinet Member for Climate Action & Community Power
- Councillor Fleur Donnelly-Jackson – Cabinet Member for Housing & Resident Services
- Councillor Krupa Sheth – Cabinet Member for Public Realm & Enforcement
- Councillor Harbi Farah – Cabinet Member for Safer Communities, Jobs & Skills
- Councillor Gwen Grahl – Cabinet Member for Children, Young People & Schools
- Councillor Neil Nerva – Cabinet Member for Community Health & Wellbeing
- Cllr Jumbo Chan – Chair, Audit & Standards Committee
- David Ewart – Independent Chair of the Audit & Standards Advisory Committee
- Kim Wright – Chief Executive
- Minesh Patel – Corporate Director, Finance & Resources
- Peter Gadsdon – Corporate Director, Partnerships, Housing & Resident Services
- Alice Lester – Corporate Director, Neighbourhoods & Regeneration
- Debra Norman – Corporate Director, Law & Governance
- Rachel Crossley – Corporate Director, Community Health & Wellbeing
- Nigel Chapman – Corporate Director, Children & Young People
- Gerry Ansell – Director, Inclusive Regeneration & Employment
- Chris Whyte – Director, Public Realm
- Tanveer Ghani – Director, Property & Assets
- Ravinder Jassar – Deputy Director of Finance
- Amanda Healy – Deputy Director, Investment & Infrastructure
- Peter Cosgrove – Head of Revenues & Debt
- Jason Sigba – Strategy Lead, Scrutiny
- Chatan Popat – Strategy Lead, Scrutiny

We would also like to express its sincere gratitude to the following valued partners and stakeholders, whose input was instrumental in ensuring a robust consideration of the 2025/26 budget proposals:

- CAB Brent
- Crisis Skylight Brent

- Brent Mencap
- Young Brent Foundation
- Jason Roberts Foundation
- Age UK Hillingdon, Harrow, and Brent
- Elders Voice
- ACE Brent

Key Contacts:

Jason Sigba, Strategy Lead - Scrutiny, Law & Governance
020 8937 2036
Jason.Sigba@brent.gov.uk

Amira Nassr, Deputy Director, Democratic Services, Law & Governance
020 8937 5436
Amira.Nassr@brent.gov.uk

Pipeline Project ID	Project Name	Portfolio	Programme and purpose of scheme	Proposed Budget (M)	Funding Proposals (M)	Business Case to CPB	Borough Plan Objectives	Strategic Alignment	Statutory Obligations	Risk	Financial Return	Demand Management	Rating
Corporate Landlord													
PL021	Land & Property strategic acquisitions (general)	Corporate Landlord	Strategic Acquisitions: Papers will be taken forward to the Capital Programme Board when strategic land opportunities arise and are developed within regeneration areas. The key focus areas are Alperton and Staples Corner.	44.5	Ongoing	Ongoing	Prosperity and Stability in Brent -Invest in new land ownership opportunities to deliver more joined up projects and services with localities and neighbourhoods.	Borough Plan Local Plan	None	1. Opportunities are market led and this difficult to predict 2. Generally investment opportunities in the targeted areas are popular as property assets are high performing or present good asset-management potential (re-development etc.)	Some opportunities will have income as part of the asset opportunity - this will be assessed on a case by case basis	Local Plan identifies these areas as in need of growth and regeneration to deliver benefits and help to accommodate significant numbers of new homes to meet housing targets	2
PL061	Energy Efficiency Measures Works across the Corporate Estate, to achieve Net Zero by 2030	Corporate Landlord	Energy - Capital - The Council has a target to reach net zero emissions from its own corporate estate by 2030 as stated in Brent's Climate and Ecological Emergency Strategy.To achieve this the council needs to reduce the carbon emissions from its corporate buildings as far as possible by implementing all available energy efficiency and heat decarbonisation measures. The key measures are: •insulation (external and internal wall, loft, and draught exclusion) •window glazing •LED lighting •Building Management System (BMS) upgrades •Solar (PV) panels on roofs and heat pumps (most likely to be Air-Source Heat Pumps, or in some cases Ground-Source Heat Pumps). The Council has made good progress in reducing its Carbon Dioxide (CO2) emissions across its estate, with Council corporate buildings emissions falling by 62% from 2010/11 (our data baseline year) to 2021/22 (the most recent year data currently available). Much of those savings were achieved by the move away from many older buildings to the Civic Centre, and by the decarbonisation of the national grid.	9.6	PSDS / Capital Borrowing	TBC	A Cleaner, Greener Future. • A Cleaner Borough • Climate-friendly, Sustainable Borough • Keeping Brent on the Move	Brent Council's Climate and Ecological Emergency Strategy target to do all in its gift achieve net zero carbon emissions by 2030, including leading by example achieving net zero by 2030 across its own corporate estate.	None	PSDS grant scheme ends or is suspended meaning future grant is unavailable. Future PSDS phase bids are unsuccessful meaning grant is unavailable. - Alternative sources of funding will be required, which could be interest free loans, combined with increased (up to 100%) Council own funds required. Cost estimates calculations in this report and spreadsheet are based on inaccurate assumptions (which are as stated in the notes within the spreadsheet). Future Inflationary cost increases are high, so that costs are underestimated. -Costs estimates should be reviewed and updated annually.	The energy cost savings that could be achieved by the completion of the energy efficiency measure works on corporate sites between 2025/26 and 2028/29.	None	2
PL062	Vale Farm Sports Centre Capital Improvements NEW	Public Realm	Vale Farm Centre Improvements: Vale Farm Sports 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. This contract ends in August 2025. The Vale Farm building condition report (August 2023) suggests that capital investment of a minimum of £1.4m in the sports centre will be required over the next 10 years to ensure the building remains in a condition to provide high quality leisure services to residents.	1.4	Capital Borrowing	April-25 Cabinet	A Healthier Brent - Provision of high-quality sports facilities encourages physical activity, helps to improve the physical and mental wellbeing of the community and seeks to reduce health inequalities.	Borough Plan 2023-2027 Health and Wellbeing Plan Climate + Ecological Emergency Strategy	None.	The key risk for the feasibility of this project is that it is entirely dependent on capital funding. Should funding not be awarded, the project will be unlikely to go ahead. The lack of investment in the Sports Centre will affect provider bidding for a management contract to run the sports centre.If the sports centre does not improve the condition of the building, there is potential that it could close and thus deny residents the opportunity to learn to swim, swim and use the sports and leisure facilities.	The provision of improved sports facilities will result in an increase in activities and revenue generated from charges, which will be detailed in the business case.	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. Maintaining the leisure provision to a good standard in the borough is essential in enabling residents to access quality and safe provision.	2
PL046	Barham Park	Public Realm	Improvements to Barham Park: There is a need to improve the buildings and landscaped grounds at Barham Park. Funding required for a strategic review and the refurbishment of the Barham Park Estate, estimated at £1m to £3m Status Jan 24: We are awaiting the completion of a surveyor-led review of the building which will inform intended works. The spread of expenditure for the years of the programme will be clearer after the review, but more probable that the cheaper option of maintenance only will be the selected option which will be c£1m	1.0	SCIL, S106, Council capital - TBC	Jul-25	Thriving Communities - Improved building and grounds at this community hub will encourage visitors and participation, support community cohesion and increased resident satisfaction A Healthier Brent - Provision of community space and attractive grounds encourage visitors, walking and supports the health of Brent Residents and reduce health inequalities.	Borough Plan 2021-2022, Brent Climate & Ecological Emergency Strategy 2021-2030	Local authorities in England have a statutory duty to provide a range of services to their communities.	1. Dependant on a strategic review of existing facilities and identifying improvements to the building and grounds.	The capital investment is necessary to maintain the building and grounds for continued use as important community space, retaining income to the Barham Park Trust for which the Council is the sole trustee.	Barham Park is an important community hub providing a range of services and recreational activities. There is a growing need for the renovation of the building and grounds to address deterioration, reduce energy costs, and the risk of a loss of tenants including the ACAVA charity, Barham Community Library, the Veterans Club, Tmu Samaj and the Children's Centre.	2
PL051	Commercial Property Asset Management Programme	Corporate Landlord	Asset Management Programme: The commercial property portfolio are key resources for the Council to provide economic return and public value. The commercial portfolio generates circa £3m rental income per annum from around 190 business and third sector lettings, which includes a number of multi-let buildings. In order to be kept in good use they require an inflow of financial capital for their maintenance, repairs, refurbishments and upgrades where needed for the purposes of maintaining or upgrading the stock of physical capital over time.	0.8	Capital borrowing	TBC	Prosperity and Stability in Brent - Investing in our commercial property portfolio will improve our offering to local businesses to better support our high streets by increasing footfall.	This proposal aligns with the Council's Borough Plan – the provision and supply of good quality accommodation for organisations impacts on all priorities.	The project would help fulfil the statutory obligations of health and safety in respect of the Council's landlord responsibilities, as well as supporting the accurate reporting of property values for statutory accounting purposes which relies on accurate stock condition information.	None identified. There are risks in not carrying out the project as mentioned in the main body of the report.	None	Economic and social changes are having an impact on supply and demand for properties i.e. increasing demand from all sections of the community.	1
Corporate Landlord Total				57.3									
Affordable Housing Supply Board													
PL012	St Raphael's estate	Affordable Housing Supply Board	Mixed Development: Brent's Housing Strategy for the period 2014-2019 outlines that the St Raphael's project aims to not only enhance existing housing and public spaces but also contribute to new housing supply. This project presents an opportunity to bring about fundamental improvements in the area, encompassing upgrades to housing and local infrastructure. Depending on whether the approach involves infill or redevelopment, these improvements have the potential to positively impact the economic, social, and environmental aspects of the Borough. The significant financial gap in the viability of redevelopment makes it necessary to prioritise infill development, which does	100.0	AHP Grant	TBC	Prosperity and Stability in Brent - Increase and improvement in housing supply and reduction in number of households in temporary accommodation. Thriving Communities - There was an	Borough Plan 2021-2022 Brent Climate & Ecological Emergency Strategy 2021-2030 Poverty Commission Housing Asset Management	St Raps development will provide the following statutory provision: - Housing for families in Brent	1. Subject to planning permission 2. Cost of development - prices have increased following pandemic 3. Possibility of residents objecting proposals	Schemes - partially funded by GLA. This assumes a reasonable cost to build, however if development prices increase,	The provision of affordable housing is linked to the future need highlighted by housing waiting list	4

			not require a public ballot. The design work for Phase 1 of the project began in the summer of 2020/21, with a planning submission made in February 2023, and a decision expected in April 2024. It is important to note that the subsequent phases of the proposal, which involve substantial regeneration efforts, will only proceed once the development approach for Phase 1 has been finalised.				Thriving Communities - there was an increase in resident involvement ahead of the decision between redevelopment or infill.	Housing Asset Management Strategy 2020-2025		3. Possibility of residents objecting proposals	viability will be challenged.	waiting list.	
PL044	New Council Homes Programme	Affordable Housing Supply Board	New Council Homes Programme: The council has successfully negotiated a reduction in the number of units from 701 to 572 for the GLA's Affordable Homes Programme 2021-2026, while maintaining the same grant allocation of £111m. This adjustment was primarily necessitated by an increase in inflation and construction costs. The council's initial bid was structured with the goal of achieving a break-even point for each project within 60 years from practical completion. However, the total estimated scheme costs to deliver 572 new homes have now been revised to approximately £214.4m.	214.4	AHP Grant	Ongoing	Prosperity and Stability in Brent - increase and improvement in housing supply; reduction in number of households in temporary accommodation or homeless in the borough. Thriving Communities - there is an increase in resident involvement ahead of all new developments	Borough Plan 2021-2022 Brent Climate & Ecological Emergency Strategy 2021-2030 Housing Asset Management Strategy 2020-2025 Homelessness and Rough Sleeping Strategy 2020-2025	NCHP will provide the following statutory provision: - Housing for families in need in Brent	1. Subject to planning permission 2. Cost of development - prices have increased following pandemic 3. Possibility of residents objecting proposals 4. Availability of sites	Schemes - partially funded by GLA. This assumes a reasonable cost to build, however if development prices increase, viability will be challenged.	The provision of affordable housing is linked to the future need highlighted by housing waiting list.	4
Affordable Housing Supply Board Total				314.4									
Public Realm													
PL069	Infrastructure Improvements supporting active travel NEW	Public Realm	Infrastructure Improvements Supporting Active Travel: The council is taking a progressive and pioneering approach to tackling the climate and ecological emergency through the delivery of several Green Neighbourhood pilots (the first phase being Church End & Roundwood; and Kingsbury) which have been allocated £3m SCIL funding following Cabinet approval. . With significantly reduced TfL funding there is a need to invest in our infrastructure to support walking and cycling in the wider borough and it is currently anticipated that an additional £2m will be required over the next 4 years to deliver our strategic objectives outlined in the Brent Active Travel Implementation Plan . Proposed interventions will be subject to agreement by the IOWG (for potential CIL funding) and the CPB for project approval reviews.	0.5	SCIL	Jun-25	A Cleaner, Greener Future This investment in measures to support safe and sustainable transport will contribute to the desired borough plan outcome of; Keeping Brent on the Move, delivering the Long Term Transport Strategy and Healthy Streets programme to encourage more active travel, walking and cycling in safe, inclusive, designed environments. A Healthier Brent This investment will help tackle health inequalities through improving active travel amenities to support general well being.	Brent Borough Plan 2023-2027 Brent Climate & Ecological Emergency Strategy 2021-2030 Brent Long Term Transport Strategy 2015-2035 Brent's Third Local Implementation Plan 2019-2041 Brent Active Travel Implementation Plan 2024-27.	The Climate Change Act 2008 (the Act) is the statutory basis for the UK's approach to tackling and responding to climate change. The Act places a legal duty on central government to set legally binding targets to reduce UK greenhouse gas emissions to net-zero by 2050 The Greater London Authority Act 1999 ("the GLA Act") requires that in exercising any function, London local authorities must have regard to the Mayor's Transport Strategy which sets out the transport policy framework for London.	There is a risk to the council achieving its strategic aspirations if there is insufficient funding invested in improving the public realm to support safer and greener travel. Schemes should be developed and implemented alongside the community wherever possible, to minimise risk of public opposition.	There is no specific financial return to the Council, however, creating a safer and greener environment will reduce injury accidents and emissions which benefit health and contribute to reducing significant costs to the UK economy. The programme will support the wider Council objectives to encourage sustainable travel, improve air quality, the local economy and community health and general well-being.	The Council receives numerous requests for implementing improvement schemes which are mainly funded by Transport for London LIP corridors and neighbourhood's improvements programme, with the aim of improving people's health and wellbeing and facilitating social inclusion. The focus will be on delivering schemes that support growth in the borough and our strategic objectives to improve the environment.	2
PL068	Woodcock Park Flood Alleviation Scheme (FAS) NEW	Public Realm	Flood Alleviation Scheme: LB Brent has been allocated a total of £80k in Levy funding from the Environment Agency (EA) to carry out a Flood Alleviation Scheme feasibility study in Woodcock Park on the Wealdstone Brook. The Wealdstone Brook flows through Woodcock Park. The EA flood map for rivers and seas shows that the properties along the brook downstream of Woodcock Park are at medium and high risk of fluvial flooding.	0.5	Capital Borrowing	Apr-25	A Cleaner, Greener Future	Climate and Ecological Emergency Strategy	None	Price inflation/materials	None	None	3
PL031	Neasden Connectivity and Place Making Improvements	Public Realm	Strategic Transport: The proposal is to improve the character and connectivity in Neasden town centre to enhance the public realm, increase footfall, increase active travel and support businesses.	3.2	SCIL, S106, TfL - TBC	April-25/May-25	Prosperity and Stability in Brent A Cleaner, Greener Future A Healthier Brent	Borough Plan Draft Long Term Transport Strategy Draft Local Plan	Statutory requirement to provide a spatial strategy for the area; this is part of the delivery of the adopted Local Plan.	Price inflation/materials	None directly; would be SCIL eligible	Once Neasden Growth Area gets into delivery, population of Neasden will increase	2
PL070	Replacement of water pipes in Parks Pavilions NEW	Public Realm	Park Pavilions improvements: Budget is required to replace water piping and heating systems in a number of parks pavilions so as to maintain hygiene standards. The investment will allow for an upgrade of piping and water tanks, providing more connections directly to the mains and addressing any potential issue that could cause pavilions to be closed.	0.8	SCIL / Capital Borrowing - TBC	Apr-25	A Cleaner, Greener Future Thriving Communities A Healthier Brent	Health and Wellbeing Plan	None	The risks are that the pavilions will need to permanently close if investment is not made, meaning that sports bookings will not take place, revenue to the service will decrease and Brent's reputation will be adversely impacted as we will no longer be able to offer the hire of grass sports pitches to any clubs.	The investment would allow our pavilions to remain open all the time, thereby facilitating the Parks Service to be able to increase hire opportunities and increase revenue possibilities. Investment would also reduce the expenditure from revenue on the cost of remedial works required after every positive test result. Figures are still being prepared in relation to the proposed additional income that could be achieved.	We are trying to increase community use of our sports pitches and can only achieve this if people can also use our facilities at the same time.	2

PL058	Parks Infrastructure Improvements	Public Realm	Park Infrastructure Improvements: A large number of pathways in parks are falling; with edging falling away and tree root incursion. These are a health and safety issue requiring investment. At least two of our pavilions are suffering from high deterioration internally, meaning that we cannot rent or use them and gain any income. The aviary at Roundwood has subsidence and requires structural repair and the toilets at Roundwood need to be demolished and alternative provision made in the bowling green area, reducing the opportunity for ASB and vandalism. The Service continues to assess any potential external funding to cover the costs of these works, and in the understanding that whilst works are to be funded through Council borrowing, that the Council is unlikely to commence these works,	2.0	Capital Borrowing	Feb-25	A Cleaner, Greener Future - This investment will help make our parks more sustainable for increased use by the local community. A Healthier Brent - Investing in the infrastructure will allow for more residents to access our open spaces and seek opportunities for improved physical and mental wellbeing.	Borough Plan Brent-climate - ecological-emergency-strategy-2021-2030	None	1) Without investment our pathways are becoming health and safety risks for visitors leading to increased insurance claims for trips and falls and closure of pathways that cannot be used. There is no other source of funding for this kind of infrastructure. 2)The toilet block in Roundwood is one of the few remaining in our parks. It has been closed for the last year, leading to high levels of complaints and public dissatisfaction. 3) The internal stairs and upstairs floor at the pavilion in Vale Farm in particular, are disintegrating, creating a health and safety risk and putting the structure of the building at risk. We cannot hire out the building in its current condition and to not invest in repair, means we risk being able to meet income targets set out for 2024/25 FY.	The provision of improved sports facilities will result in an increase in activities and revenue generated from charges, which will be detailed in the business case.	Brent has a growing population and demands for community sports provision in our parks will increase in future years.	2
PL020	Sports Programme	Public Realm	Green spaces: Improvement works to a range of grounds (including football, cricket and rugby) and their facilities, feasibility studies and longer-term improvement works. Discussions with Middlesex FA have also raised the possibility of match funding to allow us to improve the quality of many more of our pitches than previously anticipated. The Service continues to assess any potential external funding, or savings elsewhere to mitigate the cost, to cover the costs of these works, and in the understanding that whilst works are to be funded through Council borrowing, that the Council is unlikely to commence these works.	1.1	Capital Borrowing	Feb-25	A Healthier Brent - Provision of high-quality sports facilities encourages physical activity, helps to improve the physical and mental wellbeing of the community and seeks to reduce health inequalities.	Borough Plan 2023-2027	None.	Without investment, many community clubs will seek to play their games elsewhere and issues with pitch quality have already led to the cancellation of many games last season, leading to a loss of income to the Parks Service and reduced opportunities for grass roots sports provision.	The provision of improved sports facilities will result in an increase in activities and revenue generated from charges, which will be detailed in the business case.	Brent has a growing population and demands for community sports provision in our parks will increase in future years.	1
Public Realm Total				8.1									
Regeneration													
PL064	Hillside Corridor NEW	Regeneration	Hillside Corridor: To deliver a variety of council and community facilities across a number of sites along Hillside, Stonebridge. The proposal includes for a new leisure centre, council homes, community facilities, new adult education centre, workspace and youth facilities	195.0	SCIL/ Sport England / Land Sale Receipt / Borrowing / GLA Affordable housing grant(s)	Apr-25	Prosperity and Stability in Brent Thriving Communities A Healthier Brent	Local Plan Infrastructure Delivery Plan	Provision of Council Homes	Sufficient CIL to fund projects – working to ensure a cost-effective solution is proposed and within CIL budgets / availability. Reliance on Land Sale Agreement – liaising with Developer to maximise land sale receipt whilst enabling planning to be obtained Planning approval – extensive pre-app process, planning consultant appointed	Leisure centre operation is expected to generate a surplus annually – compared with existing centre which costs £500k per annum. Under assumption operation will be outsourced. Community facilities potential to bring in revenue from leasing space(s)	Need to provide new Council Homes A new leisure centre will offer greater opportunities for health and wellbeing outcomes in Stonebridge	4
PL065	Staples Corner Growth Area Masterplan SPD - A5 Toucan Crossing and Highways Improvements NEW	Regeneration	Staples Corner Growth Area Masterplan SPD - A5 Toucan Crossing providing direct pedestrian / cycle link from Staples Corner Growth Area to Brent Cross West Thameslink Station, plus localised public highways improvements to access and servicing arrangements for Staples Corner industrial estates to prime the development sites for industrial intensification and mixed-use redevelopment.	2.0	SCIL	Mar-25	Prosperity and Stability in Brent A Cleaner, Greener Future Thriving Communities	Brent Borough Plan Brent Local Plan Staples Corner Masterplan	Infrastructure to support the spatial strategies and the delivery of the Staples Corner Masterplan and Local Plan.	Design, planning and construction risks; build cost inflation; contractual risks; utilities. Transport for London. GLA. LB Barnet.	Improved infrastructure will be expected to support regeneration and growth in the SCGA, including new housing and industrial floorspace, with associated benefits and an increase in the local tax base via council tax and business rates income, and CIL and s106 receipts.	Staples Corner is a growth area and identified for significant regeneration including 2,200 homes. It is dominated by highways infrastructure (North Circular and Edgware Road), that is heavily trafficked and polluted, and presents a hostile environment, particularly for pedestrians and cyclists.	4
PL063	Neasden Civic Partnership Programme NEW	Regeneration	Neasden Civic Partnership Programme: The Neasden Town Centre Placemaking & Sustainability Action Plan was developed with MOL Civic Partnership Programme Strategy funding and after engagement with local residents, businesses and community groups late 2023 / early 2024. Brent Council Leadership endorsed the Strategy as the basis for MOL Civic Partnership Programme Exemplar capital funding bid. Neasden Civic Partnership Programme (NCP) secured £3.1m capital funding (predicated on £7.3m SCIL match funding) to deliver three exemplar projects: 1) Public Realm 2) Community Programming 3) Eastern Gyration The investment opportunity is to revitalise the declining priority Neasden Town Centre, deliver infrastructure required to support regeneration, mixed use development and new housing in the wider local area, and ensure growth is inclusive and benefits new and existing communities alike. Regeneration Board support for the NCPP secured 2/2024; Brent Council Leadership support for the funding application 5/2024; Infrastructure Office Working Group cleared NCPP projects as SCIL eligible 7/2024; GLA funding announced 8/2024; key decision to enter GLA grant agreement 10/2024 signed 11/2024; NCPP Project Manager recruited to start 12/2024. Project delivery FY2425, FY2526, FY2627, FY2728.	10.5	SCIL, GLA	Nov/Dec-24	Prosperity and Stability in Brent A Cleaner, Greener Future Thriving Communities	Brent Borough Plan Brent Local Plan Climate & Ecological Emergency Floor Risk Management Strategy Inclusive Growth Strategy Long Term Transport Strategy Neasden Stations Masterplan Neasden Town Centre Plan	NCPP will contribute to the statutory requirement to provide a spatial strategy for the area; NCPP will contribute to delivery of the adopted Local Plan. Transport and highways improvements would contribute to local authority highways obligations.	Design, planning and construction risks; build cost inflation; contractual risks. GLA funding agreement. Transport for London.	Improved infrastructure and local amenities in and around Neasden Town Centre will be expected to support regeneration and growth in the NSGA, plus localised town centre infill development, including new housing and commercial floorspace, with associated benefits and an increase in the local tax base via council tax and business rates income, and CIL and s106 receipts. Neasden Town Centre local economic development provides opportunities for local business growth and jobs.	Neasden Town Centre is a priority town centre and located in an area that is simultaneously identified for significant regeneration and growth (in NSGA and CEGA); but also an existing population disadvantaged by high levels of deprivation.	5
Regeneration Total				207.5									
Schools													

PL048	Post-16 Skills Resource Centre & SEND School Expansion Revised	Schools	Post-16 Skills Resource Centre: To develop a post-16 resource centre at Aircro Close and horticultural centre at Welsh Harp to support young people aged 16 – 25 with SEND.	3.0	SCIL, Basic Need Grant, High Needs Capital Grant	Jan-25	The Best Start in Life - supporting the continued development of young people by providing new skill opportunities for them to succeed. Prosperity and Stability in Brent - easing cost of living crisis through providing young people with SEND employable skills and abilities	The Brent SEND Strategy 2021-2025 The Brent Youth Strategy 2021-2023	The Children and Families Act 2014 introduced a new legislative framework for children and young people aged 0-25 with SEND.. The reforms aimed to increase protection for young people with SEND and to promote a greater focus on outcomes and preparing for adulthood.	Increasing inflation costs and its impact on the construction industry (resources, materials, deliveries)	None directly	The School Place Planning Strategy Refresh, agreed by Cabinet in November 2021, evidences the growing demand for places that meet the needs of children and young people with SEND. The rationale for a Post 16 Skills Resource Centre is supported by the changing demography, with increasing numbers of young people with SEND.	4
PL066	School AMP Programme (2026 - 2028) NEW	Schools	School AMP Programme 26-28: Condition improvement programme for Council Community and Foundation Schools.	7.2	School Condition Funding	Aug-25	The Best Start in Life - supporting the continued development of young people by providing new skill opportunities for them to succeed.	School Place Planning Strategy 2024 - 2028	The Council is the responsible body for Community and Foundation Schools. Funding is provided under section 31 of the Local Government Act 2003	Increasing inflation costs and its impact on the construction industry (resources, materials, deliveries) Programme / funding available may not be sufficient to cover all condition requirements across the school portfolio	None	Need to maintain schools, otherwise a risk of losing school days due to poor quality buildings	
PL067	SEND Satellite School at The Stonebridge School NEW	Schools	SEND Capital Programme: To develop a SEND Satellite school at The Stonebridge School to meet increasing SEND provision whilst using spare mainstream capacity	1.0	High Needs Capital Grant	Mar-25	The Best Start in Life - supporting the continued development of young people by providing new skill opportunities for them to succeed. Prosperity and Stability in Brent - easing cost of living crisis through providing young people with SEND employable skills and abilities	The Brent SEND Strategy 2021-2025 School Place Planning Strategy 2024 - 2028	Council has the statutory duty to place young people in an appropriate school setting	Increasing inflation costs and its impact on the construction industry (resources, materials, deliveries) Both schools (host and tenant) may ask for significant building changes to accommodate the satellite school	Saving on the High Needs Block	As set out in the School Place Planning Strategy 2024 - 2028 and any annual refreshes	
Schools Total				11.2									
Grand Total				598.5									

Priority Ranking: 5 = high priority and 1 = low priority

Capital Strategy Report 2025/26

Introduction

1. This Capital Strategy Report gives a high-level overview of how capital expenditure; capital financing and treasury management activity contribute to the provision of local public services along with an overview of how associated risk is managed and the implications for future financial sustainability.
2. Decisions made this year on capital and treasury management will have financial consequences for the Council for many years into the future. They are therefore subject to both a national regulatory framework and to local policy framework, summarised in this report.

Capital Expenditure and Financing

3. Capital expenditure is where the Council expends money on assets, such as property, vehicles or other assets that will be used for more than one year. In local government this includes spending on assets owned by other bodies, and loans and grants to other bodies enabling them to buy assets. The Council has some limited discretion on what counts as capital expenditure, for example assets costing below £5,000 are generally not capitalised and are charged to revenue in year. A review is currently being undertaken as to appropriate de-minimus level below which capitalisation will not take place. Details of the Council's policy on capitalisation is set out in the annual Statement of Accounts.
4. In 2025/26, the Council is planning capital expenditure of £346.5m as summarised below:

Table 1: Prudential Indicator: Estimates of Capital Expenditure

Capital Expenditure & Financing (£m)	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	Total 2025/26-2029/30
	Budget	Budget	Budget	Budget	Budget	Budget	
Corporate Landlord	13.5	9.7	36.1	24.3	3.7	4.5	78.3
Housing GF	76.1	117.2	34.6	15.3	0.0	0.0	167.1
Schools	28.3	16.9	26.6	5.8	5.3	0.0	54.6
Regeneration	45.6	106.5	33.6	23.3	14.1	0.0	177.5
Public Realm	24.9	17.8	4.7	1.6	6.2	0.2	30.5
South Kilburn	33.4	28.0	20.2	16.9	7.6	1.2	73.9
HRA	54.7	50.4	94.1	28.0	13.9	11.1	197.5
Total Capital Expenditure	276.5	346.5	249.9	115.2	50.8	17.0	779.4

Appendix F

5. The Capital Programme comprises of projects approved by Cabinet from previous year budget setting, new projects approved in year and being brought forward including those promoted from the pipeline provision. Furthermore, future pipeline projects have been included in Table1.
6. The main General Fund capital projects between 2025/26 and 2029/30 include the Council Homes Programme £167.2m (including I4B investment); Housing Zones Regeneration Programme £90.0m; South Kilburn regeneration programme £73.8m; Schools capital programme £54.7m; Bridge Park Regeneration £46.9m; and Development of College Northwest London £49.9m. The Council also plans to incur capital expenditure on investments, which are discussed in more detail within the Investment Strategy for 2025/26.
7. The Housing Revenue Account (HRA) is a ring-fenced account which ensures that council housing does not subsidise, or is itself subsidised, by other local services. HRA capital expenditure is therefore recorded separately and includes the building of new homes as well as expenditure on improving and maintaining council homes over the planned period. Total planned expenditure between 2024/25 and 2029/30 is expected to be £197.5m.
8. All capital expenditure must be financed, either from external sources (government grants and other contributions), the Council's own resources (revenue, reserves, and capital receipts) or debt (borrowing, leasing and Private Finance Initiative). The planned financing of the above expenditure is as follows:

Table 2: Capital financing

Capital Financing (£m)	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	Total 2025/26-2029/30
	Budget	Budget	Budget	Budget	Budget	Budget	
Grants	66.1	40.3	30.8	7.1	5.7	2.0	85.9
Section 106	27.5	13.8	29.6	19.1	11.9	0.0	74.4
Capital Receipts	28.9	41.0	29.9	35.4	2.7	1.2	110.2
Earmarked Reserves	1.2	0.9	0.9	0.9	0.8	0.0	3.5
Major Repairs Reserve	24.0	16.4	0.0	0.0	0.0	0.0	16.4
Revenue Contributions	10.6	0.6	0.6	0.6	0.6	0.6	3.0
Borrowing	118.2	233.5	158.1	52.1	29.1	13.2	486.0
Total Capital Financing	276.5	346.5	249.9	115.2	50.8	17.0	779.4

9. Excluding external sources and the Council's own resources, the remainder of assets are funded from debt. As with any debt, it must be repaid over time, and for a local

Appendix F

authority there is a statutory requirement to set aside “Minimum Revenue Provision” (MRP) in each year’s budget for debt repayment. Alternatively, proceeds from selling capital assets (known as capital receipts) may be used to replace debt finance. Planned MRP to 2029/30 is as set out in the table 3. There are no known capital receipts available for the repayment of debt.

Table 3: Funds available for the replacement of debt

Debt Repayments (£m)	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	Total 2025/26-2029/30
	Forecast	Estimate	Estimate	Estimate	Estimate	Estimate	
MRP on Prudential Borrowing	15.1	16.7	18.8	20.8	22.3	23.2	101.8
MRP on PFI Schemes & Leases	5.1	5	4.8	5.2	4.4	2.6	22.0
Total MRP	20.2	21.7	23.6	26.0	26.7	25.8	123.8
Total Loan Repayments Deemed Equivalent to MRP	0.9	1.0	1.1	1.3	1.4	1.5	6.3
Total MRP & Loan Repayments	21.1	22.7	24.7	27.3	28.1	27.3	130.1

10. The Council’s full Minimum Revenue Policy Statement is presented as an Appendix J to the annual Council Tax and Budget Setting Report.
11. The Council’s cumulative outstanding amount of debt finance is measured by the capital financing requirement (CFR). This increases with new debt-financed capital expenditure and reduces with MRP used to replace debt. The CFR is expected to increase to £1.52bn during 2025/26 and to £1.68bn by 2029/30. Based on the above figures for expenditure and financing, the Council’s estimated CFR is as follows:

Table 4: Prudential Indicator: Estimates of Capital Financing Requirement

CFR Movement (£m)	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
	Forecast	Estimate	Estimate	Estimate	Estimate	Estimate
Opening CFR	1,236.6	1,333.4	1,544.3	1,677.7	1,702.6	1,689.6
Capital Expenditure	276.5	346.5	249.9	115.2	50.8	17.0
External Resources	(93.6)	(54.1)	(60.4)	(26.2)	(17.6)	(2.0)
Internal Resources	(64.7)	(58.9)	(31.4)	(36.9)	(4.1)	(1.8)
MRP	(20.2)	(21.7)	(23.6)	(26.0)	(26.7)	(25.8)
Capital Loans Repaid	(0.9)	(1.0)	(1.1)	(1.3)	(1.4)	(1.5)
Use of capital receipts	0.0	0.0	0.0	0.0	0.0	0.0
Closing CFR	1,333.7	1,544.2	1,677.7	1,702.5	1,703.6	1,675.5

Capital Programme Governance and Prioritisation

12. The capital programme is updated annually for new schemes, revised profiling, slippage, and changes in expenditure projections. The capital programme and capital pipeline proposals 2025/26 report sets out the indicative capital programme that will be presented to Council in February 2025 as part of the annual budget setting cycle.

Pipeline Schemes

13. During the year the individual capital sub-boards developed a comprehensive list of opportunities and proposals for future aspirational capital investment to meet the council's strategic objectives. These outline bids are then collated by the Capital Programme Management Office. Currently there are 19 schemes on the Pipeline totalling £598.5m which would potentially be funded through grants, levies, section 106 contributions or borrowing. At this stage these strategic pipeline schemes are only indicative and there is a requirement that individually they will still go through the normal approval routes (i.e. Sub-board, Capital Programme Board or Cabinet). Furthermore, Officers will be required to produce detailed business cases, undertake feasibility and consult as appropriate before getting to this stage. The Pipeline schemes have been included in the main capital programme.

Capital Programme Board

14. This Board is the main forum for reviewing the financial viability of the new capital bids and monitoring of existing programme. The Board reviews all capital investment and new opportunities, oversees and maintains the list of pipeline schemes and ensures outcomes are aligned with Council's aspirations and reflective of the circumstances within Brent. The board also ensures that all projects have a viable business case and that value for money (VfM) will be delivered for the Council.

Prioritisation criteria

15. The general criteria for scoring proposals are summarised below, higher scores were applied based on the following criterion:
 - **Strategic Alignment** - How the scheme meets the outcomes of a key service objective as stated in a strategy document, business plan or action plan.
 - **Statutory Obligations** - How the delivery of a scheme is essential to ensuring the Council meets the statutory need and without the project, the Council would otherwise be at risk of failing to meet.
 - **Risk** - Whether the success of the project is dependent on mitigating high associated risks.
 - **Financial Return** - Whether the scheme generates ongoing revenue savings, a capital receipt or attract external funding (partial or fully).

- **Demand and Demographic Changes** - whether the scheme is required following a change in demographic, economic or social change that impact the borough and will reduce the demand for services in the borough.

Asset management

16. To ensure that capital assets continue to be of long-term use, the Council has a Housing Asset Management strategy in place and a Property Asset Management Strategy under review. The strategies provide a planning tool which ensures the assets are well managed and maintained in order to maximise the benefits for local residents.

Asset disposals

17. When a capital asset is no longer needed, it may be sold so that the proceeds, known as capital receipts, can be spent on new assets or to repay debt. The Council is currently also permitted to spend capital receipts on service transformation projects until 2025/26. Repayments of capital grants, loans and investments also generate capital receipts.
18. The Council plans to receive £28.9m of capital receipts in the current financial year, and a further £41.0m in 2025/26. A significant proportion of these arise from asset disposals on the South Kilburn site as well as housing sold under the right to buy (RTB) scheme. The capital receipts expected in future financial years are as follows:

Table 5: Capital receipts

£m	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	Total 2025/26- 2029/30
	Forecast	Estimate	Estimate	Estimate	Estimate	Estimate	
Asset Sales	28.9	41.0	29.9	35.4	2.7	1.2	110.2
Capital Loans Repaid	0.9	1.0	1.1	1.3	1.4	1.5	6.3
Total Capital Receipts	29.8	42.0	31.0	36.7	4.1	2.7	116.5

Treasury Management

19. Treasury management is concerned with keeping sufficient but not excessive cash available to meet the Council's spending needs, while managing the risks involved. Surplus cash is invested until required, while a shortage of cash will be met by borrowing, to avoid excessive credit balances or overdrafts in the bank current account.
20. The Council is typically cash rich in the short-term as revenue income is received before it is spent, but cash poor in the long-term as capital expenditure is incurred before being financed. The revenue cash surpluses are offset against capital cash shortfalls to reduce overall borrowing.

21. On 31st December 2024, the Council held £833.3m of borrowing (£763.3m long term and £70.0m short term) at an average rate of 3.9% and £53.9m of cash investments at an average rate of 5.1%.

Borrowing strategy

22. The Council’s main objectives when borrowing is to achieve a low but certain cost of finance while retaining flexibility should plans change in future. These objectives are often conflicting, and the Council therefore seeks to strike a balance between short-term loans at higher rates (currently available at around 5.4% to 5.8%) and long-term fixed rate loans where the future cost is lower (PWLB Annity Standard Rate currently around 5.4% to 6.3%). The Authority does not borrow to invest for the primary purpose of financial return and therefore retains full access to the Public Works Loans Board.
23. Projected levels of the Council’s total outstanding debt (which comprises borrowing, PFI liabilities and leases are shown below, compared with the capital financing requirement (see above).

Table 6: Prudential Indicator: Gross Debt and the Capital Financing Requirement

Gross Debt & the Capital Financing Requirement (£m)	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
	Forecast	Estimate	Estimate	Estimate	Estimate	Estimate
External Loans	846.5	1,055.5	1,183.0	1,202.4	1,207.7	1,196.2
PFI & Leases	32.5	28.5	24.7	22.7	20.4	17.0
Total External Debt Liabilities	879.0	1,084.0	1,207.6	1,225.1	1,228.0	1,213.2
Internal Borrowing	454.7	460.2	470.1	477.4	475.5	462.3
Capital Financing Requirement	1,333.7	1,544.2	1,677.7	1,702.5	1,703.6	1,675.5

24. Statutory guidance prescribes that debt should remain below the capital financing requirement, except in the short-term. As can be seen from Table 6, the Council expects to comply with this regulation.

Affordable borrowing limit

25. The Council is legally obliged to set an affordable borrowing limit (also termed the authorised limit for external debt) each year. In line with statutory guidance, a lower “operational boundary” is also set as a warning level should debt approach the limit.

Table 7: Prudential Indicators: Authorised limit and operational boundary for external debt

£m	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
	Limit	Limit	Limit	Limit	Limit	Limit
Authorised Limit	1,700.0	1,800.0	1,900.0	1,900.0	1,900.0	1,900.0
Operational Boundary	1,500.0	1,600.0	1,700.0	1,700.0	1,700.0	1,700.0

26. Further details on borrowing are contained within the Council's treasury management strategy.

Treasury Investment Strategy

27. Treasury investments balances arise from receiving cash before it is required to be paid out again. Investments made for service reasons or for pure financial gain are not generally considered to be part of treasury management.
28. The Council's policy on treasury investments is to prioritise security and liquidity over yield and to focus on minimising risk rather than maximising returns. Cash that is likely to be spent in the near term is invested securely, for example with the government, other local authorities or selected high-quality banks, to minimise the risk of loss. Money that will be held for longer terms is invested more widely, including in bonds, shares, and property, to balance the risk of loss against the risk of receiving returns below inflation. Both near-term and longer-term investments may be held in pooled funds, where an external fund manager makes decisions on which investments to buy, and the Council may request its money back at short notice.

Table 8: Treasury management investments

Investment Category (£m)	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
	Limit	Limit	Limit	Limit	Limit	Limit
Short term investments	20.0	20.0	20.0	20.0	20.0	20.0
Long term investments	0.0	0.0	0.0	0.0	0.0	0.0

29. Further details on treasury investments are contained within the Council's treasury management strategy.
30. **Risk management:** The effective management and control of risk are prime objectives of the Council's treasury management activities. The treasury management strategy therefore sets out various indicators and limits to constrain the risk of unexpected losses and details the extent to which financial derivatives may be used to manage treasury risks.

31. Decisions on treasury management investment and borrowing are made daily and are therefore delegated to the Corporate Director of Finance and Resources, who must act in line with the treasury management strategy approved by Council. Reports on treasury management activity are presented quarterly to Cabinet and Full Council, whilst the Audit & Standards Advisory Committee is responsible for scrutinising treasury management decisions.

Investments for Service Purposes

32. The Council makes investments to assist local public services, including making loans to council subsidiaries to promote economic growth. In light of the public service objective, the Council is willing to take more risk than with treasury investments, however it still plans for such investments to break-even after all costs.
33. Decisions on service investments are either made by Cabinet or under delegated authority or set down in the approved investment strategy. Most loans and shares are capital expenditure and purchases will therefore also be approved as part of the capital programme. Further details on service investments are contained within the investment strategy.
34. The risk of incurred unexpected losses is managed by working closely with counterparties and through the securing the loans where necessary, which would allow the Council to recover significant funds in the event of a default. A limit of £550m is placed on total investment for service purposes, to ensure that plausible losses could be absorbed within budgets or reserves without unmanageable detriment to local services.
35. The proposed budget includes sums for investment in the Council's subsidiary i4B for the acquisition of properties as part of the Council's temporary accommodation reform plan. These schemes aim to alleviate affordable housing pressures. A development finance loan to United College's Group to assist with cashflow pressures around their campus redevelopment has also been included.

Commercial Activities

36. The Council has previously invested in property, both to support regeneration and community assets, whilst also securing a financial return. The Council does not at present or in the future invest in commercial property for the purpose of making a profit. Such properties are currently valued at £319.9m and generating £2.1m per annum in rental income. Over time the use of these assets may change as new priorities are confirmed and assets are repurposed to contribute to the delivery of new strategic priorities.

Table 9: Property asset types and income generated

Asset Types	Value £m	Income PA £m
Operational	236.1	1.6
Commercial	0.0	0.0
Community Groups	82.6	0.5
Education	1.2	0.04
Total	319.9	2.14

37. The principal risk exposures include voids, diminution of capital values, etc. These risks are managed by the existing risk management framework. In order that property investments remain proportionate to the size of the authority they are under constant review and contingency plans are in place should expected yields not materialise. The Corporate Director for Finance and Resources is responsible for governance and due diligence on these investments.

Other Liabilities

38. In addition to debt of £879.0m detailed in Table 6 above expected at 31 March 2025, the Council is committed to making future payments to cover its pension fund deficit (valued at £162.0m – Report March 2022 and revalued every three years).
39. Decisions on incurring new discretionary liabilities are taken by Service Managers in consultation with the Corporate Director, Finance and Resources. The risk of liabilities crystallising and requiring payment is monitored by Corporate Finance and reported quarterly to Cabinet.

Revenue Budget Implications

40. Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and MRP payments are charged to revenue, offset by any investment income receivable. The net annual charge is known as financing costs; this is compared to the net revenue stream i.e. the amount funded from Council Tax, business rates and general government grants.

Table 10: Prudential Indicator: Proportion of net revenue stream to financing costs

Financing Costs to Net Revenue Stream	Limit	Forecast	Limit	Limit	Limit	Limit	Limit
	2024/25	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
Financing Costs (Interest & MRP) (£m)	39.1	26.4	35.0	38.9	40.8	41.9	42.8
Net Revenue Stream (£m)	383.3	387.0	430.1	444.2	461.3	479.3	479.3
Proportion of net revenue stream (%)	10.2%	6.8%	8.1%	8.8%	8.8%	8.7%	8.9%

41. Due to the very long-term nature of capital expenditure and financing, the revenue budget implications of expenditure incurred in the next few years will extend for up to 50 years into the future. The detailed information contained within the Treasury Management Strategy and the Budget & Council Tax Report 2025/26, as well as the prudential indicators included above demonstrates how the Corporate Director for Finance and Resources is satisfied the proposed capital programme is prudent, affordable, and sustainable.

Knowledge and Skills

42. The Council employs professionally qualified and experienced staff in senior positions with responsibility for making capital expenditure, borrowing and investment decisions. The Council also pays for junior staff to study towards relevant professional qualifications including, for example, Chartered Institute Public Finance & Accountancy (CIPFA).

43. Where Council staff do not have the knowledge and skills required, use is made of external advisers and consultants that are specialists in their field. The Council currently employs Arlingclose Limited as treasury management advisers. This approach can be more cost effective than employing such staff directly and ensures that the Council has access to knowledge and skills commensurate with its risk appetite.

Non-treasury Investment Strategy Report 2025/26

Introduction

1. The Council invests its money for three broad purposes:
 - because it has surplus cash as a result of its day-to-day activities, for example when income is received in advance of expenditure (known as **treasury management investments**);
 - to support local public services by lending to or buying shares in other organisations (**service investments**); and
 - to earn investment income (known as **commercial investments** where this is the main purpose).
2. This investment strategy meets the requirements of statutory guidance issued by the Government in January 2018.
3. The statutory guidance defines investments as “all of the financial assets of a local authority as well as other non-financial assets that the organisation holds primarily or partially to generate a profit; for example, investment property portfolios.” The Council interprets this to exclude (a) trade receivables which meet the accounting definition of financial assets but are technically not investments; and (b) property held partially to generate a profit but primarily for the provision of local public services. This aligns the Authority’s definition of an investment with that in the 2021 edition of the CIPFA Prudential Code, a more recent piece of statutory guidance.

Treasury Management Investments

4. The Council typically receives its income in cash (e.g. from taxes and grants) before it pays for its expenditure in cash (e.g. through payroll and invoices). It also holds reserves for future expenditure and collects local taxes on behalf of other local authorities and central government. These activities, plus the timing of borrowing decisions, lead to a cash surplus which is invested in accordance with guidance from the Chartered Institute of Public Finance and Accountancy. The balance of treasury management investments is expected to fluctuate between £20m and £150m during the 2025/26 financial year.
5. The contribution that these investments make to the objectives of the Council is to support effective treasury management activities.
6. Full details of the Council’s policies and its plan for treasury management investments are covered in a separate document, the Treasury Management Strategy 2025/26.

Service Investments: Loans

7. The Council lends money to its subsidiaries, local businesses, local charities, municipal waste authorities and academies to support local public services and stimulate local economic growth.
8. An invest to save loan was given to the West London Waste Authority which is the statutory body responsible for waste disposal in a number of West London boroughs. The funding assisted the development of a new waste treatment facility. The loan is expected to be repaid back by December 2041.
9. The Council's existing loan to First Wave Housing Limited has been used to support the provision of affordable accommodation and improve the provision of permanent housing as a registered provider. Further loan facilities may be advanced to First Wave Housing if suitable opportunities are presented. The loan to the Council's other subsidiary, i4B Holdings Ltd, has been used to purchase properties as part of the Council's temporary accommodation reform plan.
10. The School and Academies Loan Scheme has helped support significant improvements to school facilities ensuring the buildings are suitable for modern teaching and learning and accessible for pupils with disabilities.
11. The Council is planning to provide a cashflow loan to United Colleges Group, to help facilitate the development of their new campus in Wembley. Funds are currently expected to be drawn down between September 2026 and March 2027, although this may be subject to change if there are delays in the submission of related planning applications related to the existing blocks being sold as part of the process.
12. **Security:** The main risk when making service loans is that the borrower will be unable to repay the principal lent and/or the interest due. In order to limit this risk, and ensure that total exposure to service loans remains proportionate to the size of the Council, upper limits on the outstanding loans to each category of borrower have been set as follows:

Table 1: Loans for service purposes

Category of borrower (£m)	2025/26	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
	Approved Limit	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate
I4B Subsidiary Loans	500.0	222.1	222.1	222.1	222.1	222.1	222.1
I4B Subsidiary Equity		36.4	36.4	36.4	36.4	36.4	36.4
FWH Subsidiary Loans		33.8	33.4	32.9	32.5	32.0	31.5
Local Businesses	10.0	0.2	0.2	0.2	0.2	0.2	0.2
Schools, Academies And Colleges	55.0	17.6	17.4	17.1	16.8	16.5	16.2
Waste Authority	20.0	14.4	13.9	13.5	13.0	12.4	11.8
Local Charities	10.0	0.0	0.0	0.0	0.0	0.0	0.0
Housing Associations	50.0	0.0	0.0	0.0	0.0	0.0	0.0
Local Residents	5.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	650.0	324.5	323.3	322.1	320.9	319.6	318.2

13. Accounting standards require the Council to set aside loss allowance for loans, reflecting the likelihood of non-payment. The figures for loans in the Council's statement of accounts have been shown net of this loss allowance since 2019/20. However, the Council makes every reasonable effort to collect the full sum lent and has appropriate credit control arrangements in place to recover overdue repayments. The loss allowance to date has been immaterial.
14. In addition to lending service loans, the Council may consider the following service investments:
- Lending to Joint ventures (JVs), Associates and Similar entities: The Council can invest in such organisations where there is minimal risk. Moreover, there are instances when the Council is de facto required to invest or to deliver an alternative scheme.
 - The Council may lend to Companies or Charities, which are not wholly owned, which deliver services supporting the Medium-Term Financial Plan. The loans must be on a commercial basis and that the Council must require assurances that the loan principal will be repaid. Risk assessment of any proposed lending will be in accordance with the methods set out in paragraph 16.

- The Council may make small loans to organisations that are at a higher risk to support the local economy, possibly in relation to a complex regeneration scheme. Such loans, regardless of the amount, will require a delegated approval report, signed off by the Corporate Director, Finance and Resources S151 Officer in conjunction with the Cabinet Member responsible for Finance. Risk assessment of any proposed lending will be in accordance with the methods set out in paragraph 16.
- **Working Capital Facilities:** These are explicitly not capital expenditure because they exist to manage cashflows and such facilities are short term in nature. The Council can loan on a commercial basis to organisations and the approval process is via the Corporate Director, Finance and Resources S151 Officer, who depending on the size of the loan may choose to request additional approval from the relevant Cabinet Member for Finance. Regular reviews of cashflow of any entities receiving such a loan are a requirement, taking place no less than on a quarterly basis. It is anticipated that the majority of such facilities would take in relation to wholly owned companies or JVs, and that they would be on a commercial basis. However, where they are not on commercial terms, additional approval from the relevant Cabinet Member for Finance, depending on the size of the loan, should be sought. One key aspect that must be considered in relation to working capital is that the cashflow review is not just for the demonstration of the financial health of the borrower and ability to repay (plus interest), but to ensure that the loan is not being used for capital purposes. Such a facility would operate via an on-lending agreement and drawdowns would be supported by relevant documentation. Currently the Council has provided i4B a working capital facility with respect to an earlier phase of the Company.

Since working capital facilities are not capital expenditure, accounting for the facility under IFRS 9 means that a revenue charge will be recognised for the expected credit loss and therefore would impact Council balances.

15. All lending to Companies whether Council owned or not will require a formal on lending agreement.
16. **Risk assessment:** The Council assesses the risk of loss before entering into and whilst holding service loans by undertaking various financial checks and utilising specialists (where required) to advise on technical aspects of the investment. Projects funded by service loans are monitored within the Council's existing capital programme and governance reporting regime. The following risk assessment methods are used:
 - Evaluation of business plans/cashflow forecasts

- Ability to demonstrate repayment of principal and interest
 - Use of credit ratings and financial data
 - Wholly owning the company having a sizeable share in company
 - Council having first right to call on assets in the event of default / charge on assets (relevant for i4B Holdings Ltd)
 - Obtaining assurance that there is sound governance and in controls in place.
 - Determination of an exit strategy
 - Use of external advisors for accounting/taxation; legal (including Subsidy Control); and technical advice
 - Use of on-lending / loan agreements to manage the respective transaction and financial monitoring of such agreements.
17. The Council will consider other risk assessment methods as deemed appropriate and available at the time of the risk evaluation.

Service Investments: Shares

18. The Council does not hold any service investment shares. However, the Council may consider the service investment shares in the future should an opportunity arise with a wholly owned company or other companies.
19. **Security:** One of the risks of investing in shares is that they fall in value meaning that the initial outlay may not be recovered. To limit this risk and ensure that the total exposure of service investment shares remain proportionate to the size of the Council.
20. Investment shares will be subject to an expected credit loss assessment under IFRS 9.

Commercial Investments: Property

21. The Council does not at present or in the future invest in commercial property for the purpose of making a profit.

Other categories of investment

22. **Loan Commitments and Financial Guarantees:** Although not strictly counted as investments, since no money has exchanged hands yet, loan commitments and financial guarantees carry similar risks to the Council and are included here for completeness.

23. I4B currently has loans of £182.0m outstanding with the Council at varying rates of interest and maturity dates depending on the date of the initial loan draw down. A further £40m loan facility has been agreed to be advanced to I4B subject to a new loan agreement between the Council and I4B. It is expected a loan agreement will be in place by 31 March 2025.
24. United College Group (UCG) currently has a commitment to access a £30m loan facility subject to a commercial loan agreement with the Council being signed. The loan facility will give UCG a further option to extend to £50m. No loans have been drawn to date. The first loan drawdown is expected to take place in 2026/27.

Capacity, skills and Culture

25. The Council employs professionally qualified and experienced staff in senior positions with responsibility for making recommendations and decisions on Treasury Management investments and Service Investments. The Council pays for junior staff to study towards relevant professional qualifications including CIPFA and all senior members of the finance team are qualified accountants. In conjunction with the knowledge and skills of Council staff, use is made of external advisers and consultants that are specialists in their field. The Council currently employs Arlingclose Limited as treasury management advisers. This approach can be more cost effective than employing such staff directly and ensures that the Council has access to knowledge and skills commensurate with its risk appetite.
26. Our retained advisors provide a comprehensive training and awareness programme for elected Members, including training in relation to scrutiny of the Treasury Management function and the annual Statement of Accounts. The training programme covers, Local Government Finance, Corporate Governance, The Role of the Governance / Audit Committee, and capital Programme Prioritisation.
27. The Council's treasury activity (including investments and borrowing) is reported to the Audit & Standards Advisory Committee and full Council twice a year via a mid-year report as well as the full year outturn report.

Investment Indicators

28. The Council has set the following quantitative indicators to allow elected members and the public to assess the Council's total risk exposure as a result of its investment decisions.
29. **Total risk exposure:** The first indicator shows the Council's total exposure to potential investment losses. This includes amounts the Council is contractually

committed to lend but have yet to be drawn down and guarantees the Council has issued over third-party loans.

Table 2: Total investment exposure

Total Investment Exposure (£m)	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate
Treasury management cash investments	20.0	20.0	20.0	20.0	20.0	20.0
Service investments: Loans	324.5	323.3	322.1	320.9	319.6	318.2
Commercial investments: Property	0.0	0.0	0.0	0.0	0.0	0.0
Total Investments	344.5	343.3	342.1	340.9	339.6	338.2
Commitments to lend	50.0	50.0	50.0	50.0	50.0	50.0
Total Exposure	394.5	393.3	392.1	390.9	389.6	388.2

30. **How investments are funded:** Government guidance states that these indicators should include details of how investments are funded. Since the Council does not normally associate particular assets with particular liabilities, this guidance is difficult to comply with. However, the following investments could be described as being funded by borrowing. The remainder of the Council's investments are funded by usable reserves, grants and other income.

Table 3: Investments funded by borrowing

Investments Funded by Borrowing (£m)	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate
I4B Loans	258.4	258.4	258.4	258.4	258.4	258.4
First Wave Housing (FWH)	34.3	33.8	33.4	32.9	32.5	32.0
Total Service investments: Loans	292.7	292.3	291.8	291.4	290.9	290.5
Total Funded By Borrowing	292.7	292.3	291.8	291.4	290.9	290.5

31. **Rate of Return:** This indicator shows the investment income received less the associated costs, including the cost of borrowing where appropriate, as a proportion of the sum initially invested. Note that due to the complex local government accounting framework, not all recorded gains and losses affect the revenue account in the year they are incurred. Table 4 sets out the expected

rate of return on service investments whilst Table 5 sets out other investment indicators.

Table 4: Investment rate of return (net of all costs)

Investments net rate of return	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate
Treasury management investments (%)	4.67%	3.94%	3.75%	3.75%	3.75%	3.75%
Service investments: Loans (%)	2.0%	2.6%	2.6%	2.6%	2.6%	2.6%
Commercial investments: Property (%)	0.0	0.0	0.0	0.0	0.0	0.0

Table 5: Other investment indicators

Other investment indicators	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate
External Debt (Loans)	846.5	1,055.5	1,183.0	1,202.4	1,207.7	1,196.2
Net Service Expenditure	387.0	431.0	444.2	461.3	479.3	479.3
Debt to net service expenditure ratio	2.2	2.4	2.7	2.6	2.5	2.5
Commercial income as a % of net service expenditure ratio	0.0	0.0	0.0	0.0	0.0	0.0

Treasury Management Strategy Statement 2025/26

Introduction

1. Treasury management is the management of the Council's cash flows, borrowing and investments, and the associated risks. The Council has borrowed and invested substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of financial risk are therefore central to the Council's prudent financial management.
2. Treasury risk management at the Council is conducted within the framework of the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice 2021 Edition (the CIPFA Code) which requires the Council to approve a treasury management strategy before the start of each financial year. This report fulfils the Council's legal obligation under the Local Government Act 2003 to have regard to the CIPFA Code.
3. Investments held for service purposes are considered separately within the Investment Strategy.

External Context

4. The impact on the UK from the government's Autumn Budget, slower interest rate cuts, modestly weaker economic growth over the medium term, together with the impact from President-elect Trump's second term in office and uncertainties around US domestic and foreign policy, will be major influences on the Council's Treasury Management Strategy for 2025/26.
5. The Bank of England's (BoE) Monetary Policy Committee (MPC) held Bank Rate at 4.75% at its December 2024 meeting, having reduced it to that level in November and following a previous 25bp cut from the 5.25% peak at the August MPC meeting. At the December meeting, six Committee members voted to maintain Bank Rate at 4.75% while three members preferred to reduce it to 4.50%.
6. The November quarterly Monetary Policy Report (MPR) expected Gross Domestic Product (GDP) growth to pick up to around 1.75% (four-quarter GDP) in the early period of the BoE's forecast horizon before falling back. The impact from the Budget pushes GDP higher in 2025 than was expected in the previous MPR, before becoming weaker. Current GDP growth was shown to be zero (0.0%) between July and September 2024 and 0.4% between April and June 2024, a further downward revision from the 0.5% rate previously reported by the Office for National Statistics (ONS).
7. ONS figures reported the annual Consumer Price Index (CPI) inflation rate at 2.5% in December 2024, down from 2.6% in the previous month and in line with expectations. Core CPI also fell to 3.2% (3.5% in the previous month). The outlook for CPI inflation in the November MPR showed it rising above the MPC's 2% target from 2024 into 2025 and reaching around 2.75% by the middle of calendar 2025.

This represents a modest near-term increase due to the ongoing impacts from higher interest rates, the Autumn Budget, and a projected margin of economic slack. Over the medium-term, once these pressures ease, inflation is expected to stabilise around the 2% target.

8. The labour market appears to be easing slowly, but the data still require treating with some caution. The latest figures reported the unemployment rate rose to 4.3% in the three months to October 2024 and economic inactivity fell to 21.7%. Pay growth for the same period was reported at 5.2% for both regular earnings (excluding bonuses) and for total earnings. Looking ahead, the BoE MPR showed the unemployment rate is expected to increase modestly, rising to around 4.5%, the assumed medium-term equilibrium unemployment rate, by the end of the forecast horizon.
9. The US Federal Reserve has continued cutting interest rates, bringing down the Fed Funds Rate by 0.25% at its December 2024 monetary policy meeting to a range of 4.25%-4.50%, marking the third consecutive reduction. Further interest rate cuts are expected, but uncertainties around the potential inflationary impact of incoming President Trump's policies may muddy the waters in terms of the pace and magnitude of further rate reductions. Moreover, the US economy continues to expand at a decent pace, rising at an (upwardly revised) annual rate of 3.1% in the third quarter of 2024, and inflation remains elevated suggesting that monetary policy may need to remain more restrictive in the coming months than had previously been anticipated.
10. Euro zone inflation rose above the European Central Bank (ECB) 2% target in November 2024, hitting 2.2% as was widely expected and a further increase from 2% in the previous month. Despite the rise, the ECB continued its rate cutting cycle and reduced its three key policy rates by 0.25% in December. Inflation is expected to rise further in the short term, but then fall back towards the 2% target during 2025, with the ECB remaining committed to maintaining rates at levels consistent with bringing inflation to target, but without suggesting a specific path.

Credit Outlook

11. Credit Default Swap (CDS) prices have typically followed a general trend downwards during 2024, reflecting a more stable financial period compared to the previous year. Improved credit conditions in 2024 have also led to greater convergence in CDS prices between ringfenced (retail) and non-ringfenced (investment) banking entities again.
12. Higher interest rates can lead to a deterioration in banks' asset quality through increased loan defaults and volatility in the value of capital investments. Fortunately, the rapid interest rate hikes during this monetary tightening cycle, while putting some strain on households and corporate borrowers, has not caused a rise in defaults, and banks have fared better than expected to date, buoyed by strong capital positions. Low unemployment and robust wage growth have also limited the number of problem loans, all of which are positive in terms of creditworthiness.

13. Moreover, while a potential easing of US financial regulations under a Donald Trump Presidency may aid their banks' competitiveness compared to institutions in the UK and other regions, it is unlikely there will be any material impact on the underlying creditworthiness of the institutions on the counterparty list maintained by Arlingclose, the Councils Treasury Adviser.
14. Overall, the institutions on our adviser Arlingclose's counterparty list remain well-capitalised and their counterparty advice on both recommended institutions and maximum duration remain under constant review and will continue to reflect economic conditions and the credit outlook.

Interest rate forecast (December 2024)

15. The Council's treasury management adviser Arlingclose expects the Bank of England's MPC will continue reducing Bank Rate through 2025, taking it to around 3.75% by the end of the 2025/26 financial year. The effect from the Autumn Budget on economic growth and inflation has reduced previous expectations in terms of the pace of rate cuts as well as pushing up the rate at the end of the loosening cycle.
16. Arlingclose expects long-term gilt yields to remain broadly at current levels on average (amid continued volatility), but to end the forecast period modestly lower compared to now. Yields will continue remain relatively higher than in the past, due to quantitative tightening and significant bond supply. As ever, there will be short-term volatility due to economic and (geo)political uncertainty and events.
17. For the purpose of setting the budget, it has been assumed that new treasury investments will be made at an average rate of 3.9%, and that new long-term loans will be borrowed at an average rate of 5.2% in 2025/26.

Local Context

18. At 31 December 2024, the Council held £833.3m of borrowing (£763.3m long term and £70.0m short term) and £53.9m of cash investments. This is set out in further detail at **Appendix 2**. Forecast changes in these sums are shown in the balance sheet analysis in table 1 below.

Table 1: Balance sheet summary and forecast

£m	31/03/2024	31/03/2025	31/03/2026	31/03/2027	31/03/2028	31/03/2029	31/03/2030
	Actual	Forecast	Estimate	Estimate	Estimate	Estimate	Estimate
Capital Financing Requirement	1,236.6	1,333.4	1,544.3	1,677.7	1,702.6	1,689.6	1,664.6
Other debt liabilities*	32.5	28.5	24.7	22.7	20.4	17.0	15.6
Loans CFR	1,269.1	1,361.8	1,569.0	1,700.4	1,722.9	1,706.6	1,680.2
External borrowing**	(814.3)	(830.0)	(708.1)	(681.7)	(654.8)	(638.0)	(621.1)
Internal (Over) Borrowing	422.3	503.3	836.2	996.0	1,047.7	1,051.6	1,043.6
Balance Sheet Resources	(517.6)	(463.3)	(462.3)	(461.3)	(460.3)	(459.3)	(458.3)
New borrowing (or Treasury Investments)	(95.3)	40.1	373.9	534.7	587.4	592.4	585.3

* Leases and PFI liabilities that form part of the Council's total debt

** shows only loans to which the Council is committed and excludes optional refinancing and new loans

19. The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR), while usable reserves and working capital are the underlying resources available for investment. The Council's strategy has been to maintain borrowing and investments below their underlying levels, sometimes known as internal borrowing. This means the Council has minimised its interest costs by utilising internal resources over the short term instead of undertaking more expensive external borrowing. As our internal resources continue to be depleted, there is an increasing need for the Council to undertake new external borrowing to fund the capital programme. However, whilst deferring external borrowing and using internal resources minimises debt interest costs, internal resources will need to be replenished later. This could expose the Council to interest rate risk whereby interest rates could be higher (or lower) than the present day.
20. CIPFA's *Prudential Code for Capital Finance in Local Authorities* recommends that the Council's total debt should be lower than its highest forecast CFR over the next three years. Table 1 shows that the Council expects to comply with this recommendation during 2025/26.
21. As per Table 1, the Council will need to borrow up to £585.3m over the forecast period to support the financing of the capital programme and maturing debt. Table 2 sets out the Council's current and future years capital programme and capital financing.

Table 2: Capital Programme

Capital Expenditure & Financing (£m)	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	Total 2025/26-2029/30
	Forecast	Estimate	Estimate	Estimate	Estimate	Estimate	
Corporate Landlord	13.5	9.7	36.1	24.3	3.7	4.5	78.3
Housing GF	76.1	117.2	34.6	15.3	0.0	0.0	167.1
Schools	28.3	16.9	26.6	5.8	5.3	0.0	54.6
Regeneration	45.6	106.5	33.6	23.3	14.1	0.0	177.5
Public Realm	24.9	17.8	4.7	1.6	6.2	0.2	30.5
South Kilburn	33.4	28.0	20.2	16.9	7.6	1.2	73.9
HRA	54.7	50.4	94.1	28.0	13.9	11.1	197.5
Total Capital Expenditure	276.5	346.5	249.9	115.2	50.8	17.0	779.4
Grants	66.1	40.3	30.8	7.1	5.7	2.0	85.9
Section 106	27.5	13.8	29.6	19.1	11.9	0.0	74.4
Capital Receipts	28.9	41.0	29.9	35.4	2.7	1.2	110.2
Earmarked Reserves	1.2	0.9	0.9	0.9	0.8	0.0	3.5
Major Repairs Reserve	24.0	16.4	0.0	0.0	0.0	0.0	16.4
Revenue Contributions	10.6	0.6	0.6	0.6	0.6	0.6	3.0
Borrowing	118.2	233.5	158.1	52.1	29.1	13.2	486.0
Total Capital Financing	276.5	346.5	249.9	115.2	50.8	17.0	779.4

22. Table 3 details the cost of delivering the Council's proposed capital programme as well as servicing existing debt relating to past capital programmes.

Table 3: Capital financing costs

Capital Financing Costs (£m)	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
	Forecast	Estimate	Estimate	Estimate	Estimate	Estimate
Total Gross External Debt Interest (Current and New Debt)	34.0	44.8	49.6	53.7	54.5	54.7
Total Interest Payable & Expenses	35.7	46.4	50.6	54.8	55.6	55.8
Total Interest Receivable	(24.5)	(28.2)	(30.5)	(34.8)	(36.1)	(36.2)
Net Interest	11.2	18.2	20.1	20.0	19.5	19.6
MRP (Excluding PFI)	15.1	16.7	18.8	20.8	22.3	23.2
Total Interest & MRP	26.4	35.0	38.9	40.8	41.9	42.8
Revenue Contributions to Capital Programme	8.5	9.0	3.5	3.5	3.5	3.5
Total Capital Financing Costs	34.9	44.0	42.4	44.3	45.4	46.3

23. Delivering a capital programme in an environment of rising construction costs, high interest rates relative to pre-Ukraine period means that capital financing costs are expected to increase over the capital investment period as new loans are raised to fund the capital programme's borrowing requirement as set out in Table 2. The cost of new loans is based on an interest rate of 5.2%. The Council also has an ongoing obligation to service existing long dated fixed rate debt that has been raised secured to fund capital programmes of the past. The increase in capital financing costs is also attributable to Minimum Revenue Provision (MRP), a Statutory charge to the Revenue Account for the repayment of debt. MRP is increasing due to new capital spend that is being financing through borrowing, as well as existing borrowing associated with past capital programmes that requires to be repaid over the life of the assets that have enhanced or constructed. The Council uses the annuity method to determine the MRP charge, which results in a lower charge in the earlier period of the repayment schedule but increases over time.
24. To ensure financial resilience and sustainability, these emerging pressures are being built into the Council's Medium-Term Financial Strategy. Through this proactive approach, the Council aims to maintain a balanced budget while continuing to invest in essential infrastructure and services for the community through the capital programme.

Liability Benchmark

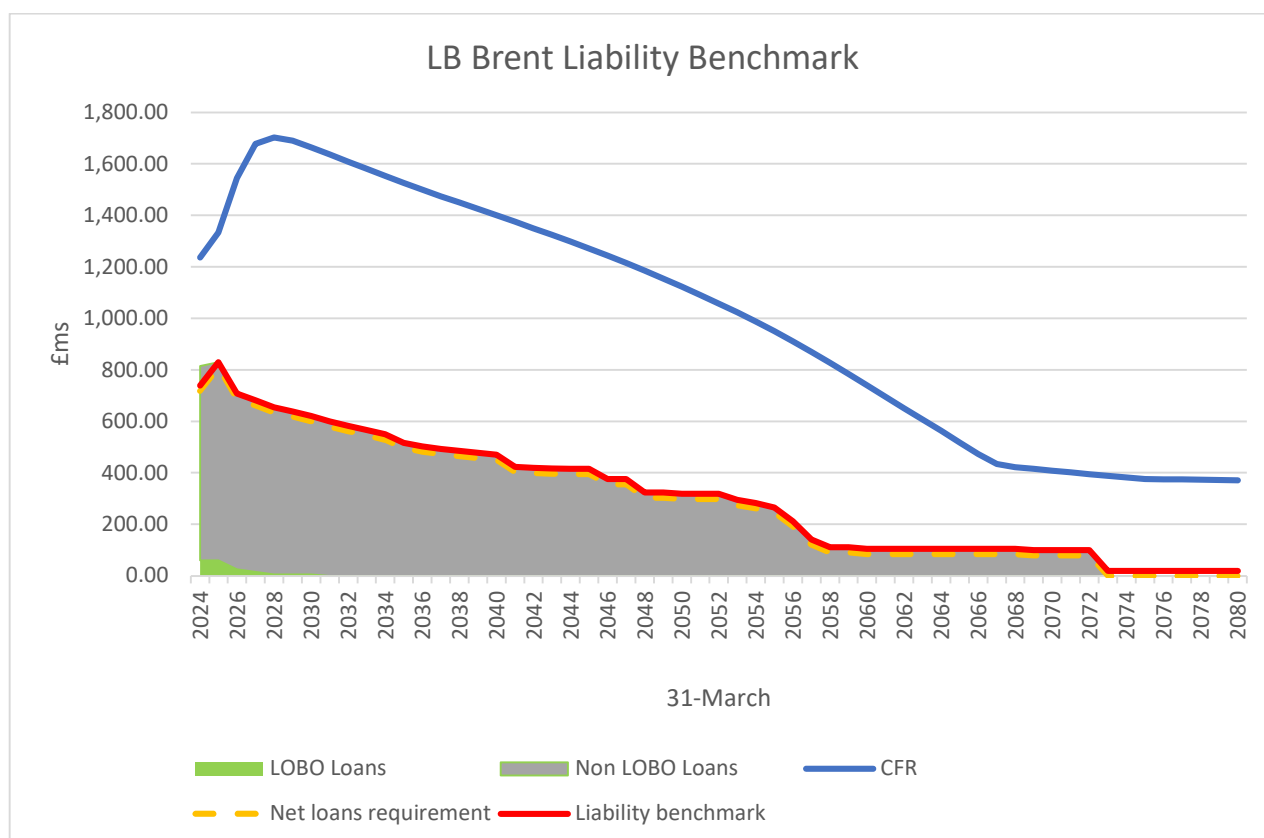
25. To compare the Council's actual borrowing against an alternative strategy, a liability benchmark has been calculated showing the lowest risk level of borrowing. This assumes that cash and investment balances are kept to a minimum level to maintain sufficient liquidity but minimise credit risk.

26. The liability benchmark is an important tool to help establish whether the Council is likely to be a long-term borrower or long-term investor in the future, and so shape its strategic focus and decision making. The liability benchmark itself represents an estimate of the cumulative amount of external borrowing the Council must hold to fund its current capital and revenue plans while keeping treasury investments at the minimum level required to manage day-to-day cash flow.

Table 4: Prudential Indicator: Liability benchmark

Liability Benchmark (£m)	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
	Forecast	Estimate	Estimate	Estimate	Estimate	Estimate
CFR	1,333.4	1,544.3	1,677.7	1,702.6	1,689.6	1,664.6
LOBO Loans	59.5	24.5	15.0	5.0	5.0	5.0
Non-LOBO Loans	770.5	683.6	666.7	649.9	633.0	616.1
Balance Sheet Resources	(463.3)	(462.3)	(461.3)	(460.3)	(459.3)	(458.3)
Net Loan Requirement	810.0	688.1	661.7	634.9	618.0	601.1
Plus Liquidity Allowance	20.0	20.0	20.0	20.0	20.0	20.0
Liability Benchmark	830.0	708.1	681.7	654.9	638.0	621.1

27. Following on from the medium-term forecasts in Table 3, the long-term liability benchmark assumes Minimum Revenue Provision (MRP) on new capital expenditure based on a 5–50-year asset life and income, expenditure and reserves remaining static in the earlier years. A higher asset life will be used where a professional opinion has been obtained. The chart below shows the profile of the Capital Financing Requirement (CFR) reducing by the MRP together with the maturity profile of the Council's existing borrowing.



28. The Loan CFR (Blue line) represents the need to fund capital expenditure through borrowing. The Liability benchmark (red Line) represents the level of borrowing requirement once reserves and working capital has been considered. Where the liability benchmark exceeds the Council's current borrowing levels (Grey area), this indicates the real need to borrow.

Borrowing Strategy

29. As of 31 December 2024, the Council held £833.3m of loans, an increase of £19.0m compared to balances held at the start of the financial year (£814.3m). The balance sheet forecast in Table 1 shows that the Council expects to borrow up to £585.3m by 2029/30, however, this is dependent on how the capital programme progresses. The Council may also borrow additional sums to pre-fund future years' requirements as well as replenish the internal borrowing position, providing this does not exceed the authorised limit for borrowing of £1.9 billion.
30. **Objectives:** The Council's main objective when borrowing money is to strike an appropriately low risk balance between securing low interest costs and achieving certainty of those costs over the period for which funds are required. The flexibility to renegotiate loans should the Council's long-term plans change is a secondary objective.
31. **Strategy:** Given the significant cuts to public expenditure and local government funding, the Council's borrowing strategy continues to address the key issue of affordability without compromising the longer-term stability of the debt portfolio.

Interest rates have increased across the yield curve over the past year. The Council will continue to work closely with our Treasury advisors, Arlingclose, to ensure borrowing occurs at optimal points avoiding the worst of the market volatility. Short-term interest rates are currently at a 15-year high but are expected to fall in the coming years and it is therefore likely to be more cost effective over the medium-term to either use internal resources, or to borrow short-term loans instead. The Council's Borrowing Strategy is to maintain its debt portfolio Pool Rate within this range of 4% to 5.0%. As at 31 December 2024 the average Debt Pool Rate (excluding PFI) was 3.91%.

32. To ensure long term stability of the debt portfolio, a proportion of the portfolio will be funded by long term borrowing using a little and often approach. Where it is affordable, this can help provide certainty to ensure the ongoing viability for capital programme schemes in these volatile markets.
33. **Sources of borrowing:** The approved sources of long-term and short-term borrowing are:
 - HM Treasury's PWLB lending facility (formerly the Public Works Loan Board)
 - UK Infrastructure Bank Ltd
 - Any institution approved for investments (see below)
 - Any other bank or building society authorised to operate in the UK.
 - Any other UK public sector body including the Greater London Authority
 - UK public and private sector pension funds (except the local Brent Pension Fund)
 - Capital market bond investors.
 - Retail investors via a regulated peer-to-peer platform
 - UK Municipal Bonds Agency plc and other special purpose companies created to enable local authority bond issues.
34. **Other sources of debt finance:** In addition, capital finance may be raised by the following methods that are not borrowing, but may be classed as other debt liabilities:
 - Leasing
 - Hire purchase.
 - Private Finance Initiative
 - Sale and leaseback
 - Similar asset-based finance
35. **Municipal Bonds Agency:** UK Municipal Bonds Agency plc was established in 2014 by the Local Government Association as an alternative to the PWLB. It issues bonds on the capital markets and lends the proceeds to local authorities. This is a more complicated source of finance than the PWLB for two reasons: borrowing authorities will be required to provide bond investors with a guarantee to refund their investment if the agency is unable to for any reason; and there will be a lead time of several months between committing to borrow and knowing the interest rate payable. Any decision to borrow from the Agency will therefore be the subject of a separate report by the Corporate Director for Finance and Resources in consultation with the Lead Member for Finance.

36. The Council has previously raised the majority of its long-term borrowing from the PWLB but will consider long-term loans from other sources including banks, pensions and local authorities, and will review the appropriateness of issuing bonds and similar instruments, in order to lower interest costs and reduce over-reliance on one source of funding in line with the CIPFA Code. PWLB loans are not available to local authorities planning to buy investment assets primarily for yield. The Council has not undertaken such borrowing and has no plans to in future, which ensures continuing access to PWLB borrowing facilities.
37. In addition to the above, the Council may borrow short-term loans to cover temporary cash flow pressures from other Local Authorities or public sector bodies and banks.
38. The Council may arrange forward starting loans, where the interest rate is fixed in advance, but the cash is received in later years. This would enable certainty of cost to be achieved without suffering a cost of carry in the intervening period.
39. **LOBOs:** As at 31 December 2024 the Council held £59.5m of LOBO (Lender's Option Borrower's Option) loans where the lender has the option to propose an increase in the interest rate at set dates, following which the Council has the option to either accept the new rate or to repay the loan at no additional cost. It is expected that £35.0m of LOBO loans (5 loans) will undergo a rate review in 2025/26 resulting in a potential change in the loan rate. Due to higher market rates, there is now an elevated risk that existing LOBO's may require refinancing at higher rates or will require repaying upon future break dates. The Council will assess the financial implications of the best approach and either repay the LOBO loan using existing cash resources (where applicable) or raise new loans.
40. **Short-term and variable rate loans:** These loans leave the Council exposed to the risk of short-term interest rate rises and are therefore subject to the interest rate exposure limits in the treasury management indicators below. Financial derivatives may be used to manage this interest rate risk (see section 71 below).
41. **Debt rescheduling:** The PWLB allows authorities to repay loans before maturity and either pay a premium or receive a discount according to a set formula based on current interest rates. Other lenders may also be prepared to negotiate premature redemption terms. The Council may take advantage of this and replace some loans with new loans, or repay loans without replacement, where this is expected to lead to an overall cost saving or a reduction in risk. Current high interest rate environment gives rise to favourable rescheduling opportunities. Such opportunities will be kept under review by Officers. Any decision to undertake debt rescheduling be the subject of a separate report by the Corporate Director for Finance and Resources in consultation with the Lead Member for Finance.

Treasury Investment Strategy

42. The Council holds invested funds, representing income received in advance of expenditure plus balances and reserves held. When cash balances are high the Council will defer the decision to borrow for the capital programme until such time cash balances deplete. Cash balances are forecasted to reduce over time as the Council is a net borrower.

43. **Objectives:** The CIPFA Code requires the Council to invest its treasury funds prudently, and to have regard to the security and liquidity of its investments before seeking the highest rate of return, or yield. The Council's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income. Where balances are expected to be invested for more than one year, the Council will aim to achieve a total return that is equal or higher than the prevailing rate of inflation, to maintain the spending power of the sum invested. The Council aims to be a responsible investor and will consider environmental, social and governance (ESG) issues when investing. The ESG Policy is discussed below.
44. **Strategy:** As demonstrated by the liability benchmark above, the Council expects to be a long-term borrower and new treasury investments will therefore be made primarily to manage day-to-day cash flows using short-term low risk instruments such as Local Authority deposits or Money-Market Funds. Cash invested beyond the liquidity duration will be in accordance with the investment instruments set out in Table 5. However, it is anticipated that the Council will not have significant cash balances to invest into long durations. The Council will maintain a minimum investment balance of £10m to ensure the Council complies with the requirements to be a professional client under MIFID II regulations.
45. **ESG Policy** - Environmental, social and governance (ESG) considerations are increasingly a factor in global investors' decision making, but the framework for evaluating investment opportunities is still developing and therefore the Council's ESG policy does not currently include ESG scoring or other real-time ESG criteria at an individual investment level. When investing in banks and funds for greater than a year, the Council will prioritise banks that are signatories to the UN Principles for Responsible Banking and funds operated by managers that are signatories to the UN Principles for Responsible Investment, the Net Zero Asset Managers Alliance and/or the UK Stewardship Code.
46. Currently, most the Council's surplus cash remains invested in short-term money market funds. The average rate of interest received on short-term investments during the year to 31 December 2024 was 4.8% with an average duration of 1 day and an average weighted risk rating of A+. Due to the Council's borrowing requirement, there is unlikely to be scope to improve the short-term investment returns achieved as liquidity of the surplus funds will play a key role.
47. **Business models:** Under the new IFRS 9 standard, the accounting for certain investments depends on the Council's "business model" for managing them. The Council aims to achieve value from its treasury investments by a business model of collecting the contractual cash flows and therefore, where other criteria are also met, these investments will continue to be accounted for at amortised cost.
48. **Approved counterparties:** The Council may invest its surplus funds with any of the counterparty types in table 5, subject to the limits shown.

Table 5: Investment Limits

	Credit Quality	Cash limit	Time Limit
Any single organisation, except a Government entity	A- Or equivalent	£20m	n/a
UK Government	Any	Unlimited	50 years
Local Authorities & other government entities	Any	Unlimited	25 years
Banks (unsecured)*	A- Or equivalent	£20m	13 months
Building Societies (unsecured)*	A- Or equivalent	£20m	13 months
Registered providers and registered social landlords*	A- Or equivalent	£20m	5 years
Secured investments*	A- Or equivalent	£20m	5 years
Money market funds*	A- Or equivalent	Lower of 5% of total net assets of the fund or £20m	n/a
Strategic pooled funds*	A- Or equivalent	£20m	n/a
Real estate investment trusts*	A- Or equivalent	£20m	n/a
Other Investments*	A- Or equivalent	£50m	5 years

49. **Minimum Credit Rating:** Treasury investments in the sectors marked with an asterisk will only be made with entities whose long-term credit rating is no lower than A-. The Council uses the lowest rating quoted by the main rating agencies, as recommended by CIPFA. Where available, the credit rating relevant to the specific investment or class of investment is used, otherwise the counterparty credit rating is used. However, investment decisions are never made solely based on credit ratings, and all other relevant factors including external advice will be considered. Within these criteria the Corporate Director for Finance and Resources will have discretion to accept or reject individual institutions as counterparties based on any information which may become available.
50. **Government:** Loans to, and bonds and bills issued or guaranteed by, national governments, regional and local authorities and multilateral development banks. These investments are not subject to bail-in, and there is a lower risk of insolvency, although they are not zero risk. Investments with the UK Government are deemed to be zero credit risk due to its ability to create additional currency and therefore may be made in unlimited amounts for up to 50 years.
51. **Banks and building societies (unsecured):** Accounts, deposits, certificates of deposit and senior unsecured bonds with banks and building societies, other than multilateral development banks. These investments are subject to the risk of credit loss via a bail-in should the regulator determine that the bank is failing or likely to fail. There is no upper limit to the maximum credit loss that the Council could suffer in the event of a bail-in scenario. See section 61 below for arrangements relating to operational bank accounts. Investments in unsecured deposits will be limited to £20m.

52. **Registered providers (unsecured):** Loans to, and bonds issued or guaranteed by, registered providers of social housing or registered social landlords, formerly known as housing associations. These bodies are regulated by the Regulator of Social Housing (in England), the Scottish Housing Regulator, the Welsh Government and the Department for Communities (in Northern Ireland). As providers of public services, they retain the likelihood of receiving government support if needed. Investments with registered providers will be limited to £20m in 2025/26.
53. **Secured investments:** Investments secured on the borrower's assets, which limits the potential losses in the event of insolvency. The amount and quality of the security will be a key factor in the investment decision. Covered bonds and reverse repurchase agreements with banks and building societies are exempt from bail-in. Where there is no investment specific credit rating, but the collateral upon which the investment is secured has a credit rating, the higher of the collateral credit rating and the counterparty credit rating will be used. The combined secured and unsecured investments with any one counterparty will not exceed the cash limit for secured investments. The Council and its advisors remain alert for signs of credit or market distress that might adversely affect the Council. Investments in secured deposits will be limited to £20m.
54. **Money market funds (MMFs):** Pooled funds that offer same-day or short notice liquidity and very low or no price volatility by investing in short-term money markets. They have the advantage over bank accounts of providing wide diversification of investment risks, coupled with the services of a professional fund manager. Although no sector limit applies to money market funds, the Council will take care to diversify its liquid investments over a variety of providers to ensure access to cash at all times. Deposits will not exceed 0.5% of the net asset value of the MMF. In addition, each Fund will be limited to a maximum deposit of £20m.
55. The investment strategy will provide flexibility to invest cash for longer periods to access higher investment returns. The upper limit for lending beyond a year is £50m. In practice, lending for more than one year will be only to institutions of the highest credit quality and at rates which justify the liquidity risk involved. Marketable instruments may have longer maturities, though the maturity will be considered in conjunction with the likely liquidity of the market and credit quality of the institution. Other than UK Central Government the Council may invest its surplus funds subject to a maximum duration of 25 years.

Alternative investment options will include:

56. **Strategic pooled funds:** Bond, equity and property funds that offer enhanced returns over the longer term but are more volatile in the short term. These allow the Council to diversify into asset classes other than cash without the need to own and manage the underlying investments. Because these funds have no defined maturity date, but are available for withdrawal after a notice period, their performance and continued suitability in meeting the Council's investment objectives will be monitored regularly. Although considered as pooled funds, MMF's are discussed separately in section 56. The Council currently has no investments in Pooled Funds (other than MMFs) at present but may make prudent use of them in the future. Investments in pooled funds will be limited to £20m in 2025/26. A Statutory Override is in place until

31 March 2025 to mitigate the accounting valuation risk impacting on the Comprehensive Income & Expenditure Account. Once the Override expires any fair value gains/losses will need to be recognised in the Comprehensive Income & Expenditure Account thus impacting on the Councils reserve balances.

57. **Real estate investment trusts (REITs):** Shares in companies that invest in real estate and pay the majority of their rental income to investors in a similar manner to pooled property funds. As with property funds, REITs offer enhanced returns over the longer term, but are more volatile especially as the share price reflects changing demand for the shares as well as changes in the value of the underlying properties. The risk with any investments in REITs is that shares cannot be withdrawn but can be sold on the stock market to another investor which leaves the Council open to market risk. Investments in REITs will be limited to £20m in 2025/26.
58. **Other investments:** This category covers treasury investments not listed above, for example unsecured corporate bonds and company loans. Non-bank companies cannot be bailed-in but can become insolvent placing the Council's investment at risk.
59. **Operational bank accounts:** The Council may incur operational exposures, for example through current accounts, collection accounts and merchant acquiring services, to any UK bank with credit ratings no lower than BBB- and with assets greater than £25 billion. These are not classed as investments but are still subject to the risk of a bank bail-in. The Bank of England has stated that in the event of failure, banks with assets greater than £25 billion are more likely to be bailed-in than made insolvent, increasing the chance of the Council maintaining operational continuity. The Council banks with National Westminster Bank (NatWest) who meet the Council's minimum credit criteria. Should NatWest's creditworthiness deteriorate below the Council's minimum credit criteria, then as far as is consistent with operational efficiency, no money will be placed with NatWest and credit balances in the various Council accounts will be kept to a minimum level.
60. **Unrated Counterparties:** For entities without published credit ratings, investments may be made either (a) where external advice indicates the entity to be of similar credit quality; or (b) to a maximum of £200,000 per counterparty as part of a diversified pool e.g., via a peer-to-peer platform.
61. **Risk Assessment:** Credit ratings are obtained and monitored by the Council's treasury advisers, who will notify changes in ratings as they occur. Any institution will be suspended or removed should any factors give rise to concern, and caution will be paramount in reaching any investment decision regardless of the counterparty or the circumstances. Should an entity's credit rating be downgraded so that it does not meet the Council's approved criteria then:
 - No new investments will be made.
 - Full consideration will be made to the recall or sale of existing investments with the affected counterparty.
62. Where a credit rating agency announces that a credit rating is on review for possible downgrade (also known as "negative watch") so that it may fall below the approved rating criteria, then only investments that can be withdrawn on the next working day

will be made with that organisation until the outcome of the review is announced. This policy will not apply to negative outlooks, which indicate a long-term direction of travel rather than an imminent change of rating.

63. **Other information on the security of investments:** The Council understands that credit ratings are good, but not perfect, predictors of investment default. Full regard will therefore be given to other available information on the credit quality of the organisations in which it invests, including credit default swap prices, financial statements, information on potential government support, reports in the quality financial press and analysis and advice from the Council's treasury management adviser. No investments will be made with an organisation if there are substantive doubts about its credit quality, even though it may otherwise meet the above criteria.
64. Having an appropriate lending list of counterparties, remains critically important to protecting Brent's cash investments. A list of extremely secure counterparties would be very small, and the limits with each would be correspondingly high. This would expose the Council to a risk of an unlikely but potentially large loss. This arises because the arrangements for dealing with banks in difficulty now require a loss to be imposed on various categories of liabilities of the banks to allow the bank to recapitalise itself and continue in business (sometimes referred to as bail in).
65. When deteriorating financial market conditions affect the creditworthiness of all organisations, as happened in 2022; 2008 and 2020, this is not reflected in credit ratings, but can be seen in other market measures. In these circumstances, the Council will restrict its investments to those organisations of higher credit quality and reduce the maximum duration of its investments to maintain the required level of security. The extent of these restrictions will be in line with prevailing financial market conditions. This will cause a reduction in the level of investment income earned but will protect the principal sum invested.
66. **Reputational Risk:** The Council is aware that investment with certain counterparties, while considered secure from a purely financial perspective, may leave it open to criticism, valid or otherwise, that may affect its public reputation, and this risk will therefore be considered when making investment decisions.
67. **Investment limits:** The Council's revenue reserves available to cover investment losses are forecast to be £506.1m on 31st March 2025. In order that no more than 10% of available reserves will be put at risk in the case of a single default, the maximum that will be lent to any one organisation (other than the UK Government and Council subsidiaries) will be £20 million. A group of banks under the same ownership will be treated as a single organisation for limit purposes.
68. **Liquidity management:** The Council uses internal purpose-built cash flow modelling tools to determine the maximum period for which funds may prudently be committed. The forecast is compiled on a prudent basis to minimise the risk of the Council being forced to borrow on unfavourable terms to meet its financial commitments. Limits on long-term investments are set by reference to the Council's medium-term financial plan and cash flow forecast. The Council aims to spread its liquid cash over at least two providers (e.g., bank accounts and money market funds) to ensure that access to cash is maintained in the event of operational difficulties at any one provider.

TREASURY MANAGEMENT PRUDENTIAL INDICATORS

69. The Council measures and manages its exposures to treasury management risks using the following indicators.
70. **Security:** The Council has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit rating of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc.) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

Table 6: Credit risk indicator

Credit risk indicator	Target
Portfolio average credit rating	A

71. **Liquidity:** The Council has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within a rolling three-month period, without additional borrowing.

Table 7: Liquidity risk indicator

Liquidity risk indicator	Target
Total cash available within 3 months	£20m

72. **Interest rate exposures:** This indicator is set to control the Council's exposure to interest rate risk. The upper limits on the one-year revenue impact of a 1% rise or fall in interest rates will be:

Table 8: Interest rate risk indicator

Interest rate risk indicator	Limit
Upper limit on one-year revenue impact of a 1% rise in interest rates	£5m
Upper limit on one-year revenue impact of a 1% fall in interest rates	£5m

The impact of a change in interest rates is calculated on the assumption that maturing loans and investments will be replaced at current rates.

73. **Maturity structure of borrowing:** This indicator is set to control the Council's exposure to refinancing risk. The upper and lower limits on the maturity structure of borrowing will be:

Table 9: Refinancing rate risk indicator

Refinancing rate risk indicator	Upper limit	Lower limit
Under 12 months	40%	0%
12 months and within 24 months	40%	0%
24 months and within 5 years	40%	0%
5 years and within 10 years	60%	0%
10 years and within 20 years	75%	0%
20 years and within 30 years	75%	0%
30 years and within 40 years	75%	0%
Over 40 years	75%	0%

Time periods start on the first day of each financial year. LOBOs are classified as maturing on the next call date i.e., the earliest date that the lender can require repayment.

74. **Principal sums invested for periods longer than a year:** The purpose of this indicator is to control the Council's exposure to the risk of incurring losses by seeking early repayment of its investments. The limits on the long-term principal sum invested to final maturities beyond the period end will be:

Table 10: Price risk indicator

Price risk indicator	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
Limit on principal invested beyond year end	£50m	£50m	£50m	£50m	£50m	£50m

Related Matters

75. The CIPFA Code requires the Council to include the following in its treasury management strategy.
76. **Financial Derivatives:** A Derivative is a contract between two or more parties to hedge against the risk associated with the performance of an underlying asset.
77. Local authorities have previously made use of financial derivatives embedded into its loans and investments both to reduce interest rate risk and to reduce costs or increase income at the expense of greater risk. Brent Council has not previously used such instruments.
78. The general power of competence in Section 1 of the Localism Act 2011 removes much of the uncertainty over local authorities' use of standalone financial derivatives (i.e., those that are not embedded into a loan or investment).
79. The Council will only use standalone financial derivatives (such as swaps, forwards, futures and options) where they can be clearly demonstrated to reduce the overall level of the financial risks that the Council is exposed to. Additional risks presented, such as credit exposure to derivative counterparties, will be considered when determining the overall level of risk. Embedded derivatives, including those present in pooled funds and forward starting transactions, will not be subject to this policy, although the risks they present will be managed in line with the overall treasury risk management strategy.

80. Financial derivative transactions may be arranged with any organisation that meets the approved investment criteria. The current value of any amount due from a derivative counterparty will count against the counterparty credit limit and the relevant foreign country limit.
81. In line with the CIPFA Code, the Council will seek external advice and consult with Members before entering financial derivatives to ensure that it fully understands the implications however there are no current plans to enter this type of arrangement. This will include analysis of the impact on interest rate, refinancing, counterparty, market, regulatory and legal risks, together with an assessment on the effectiveness of the derivative.
82. **Housing Revenue Account:** On 1st April 2012, the Council notionally split each of its existing long-term loans into General Fund and HRA pools. In the future, new long-term loans borrowed will be assigned in their entirety to one pool or the other. Interest payable and other costs/income arising from long-term loans (e.g., premiums and discounts on early redemption) will be charged/ credited to the respective revenue account. Differences between the value of the HRA loans pool and the HRA's underlying need to borrow (adjusted for HRA balance sheet resources available for investment) will result in a notional cash balance which may be positive or negative. This balance will be measured each month and interest transferred between the General Fund and HRA at the Council's average interest rate on investments, adjusted for credit risk.
83. The Council is eligible for the PWLB HRA rate, which is 0.4% below the Standard Rate, and is available up to June 2025. This discounted rate can be used to support local authorities borrowing for the Housing Revenue Account's capital programme and for refinancing existing HRA loans. The Council may choose to raise PWLB loans for the HRA in 2025/26 under the HRA concessionary rate subject to HRA affordability.
84. **Markets in Financial Instruments Directive:** The MiFID II regulations took effect from January 2018 which saw the council reclassified as a retail client with the opportunity to opt up to professional client status. Retail clients have access increased protection however this would be balanced against potentially higher fees and access to a more limited range of products. The Council has opted up to professional client status with its providers of financial services, including advisors, banks, brokers and fund managers. Given the size and range of the Council's treasury management activities, the Corporate Director for Finance and Resources believes this to be the appropriate status for the Council's treasury management activities.
85. **Financial Implications:** A capital financing budget of £35.2m for 2025/26 has been determined to enable the Council to service its debt in a timely manner; to ensure it complies with the Statutory MRP Guidance and to allow the Council to continue with the delivery of its proposed capital programme in a prudent and affordable manner.
86. **Other Options Considered:** The CIPFA Code does not prescribe any particular treasury management strategy for local authorities to adopt. The Council believes that the above strategy represents an appropriate balance between risk

management and cost effectiveness. Some alternative strategies, with their financial and risk management implications, are listed below.

Table 11: Alternative Strategies

Alternative	Impact on income and expenditure	Impact on risk management
Invest in a narrower range of counterparties and/or for shorter times	Interest income will be lower	Lower chance of losses from credit related defaults, but any such losses may be greater
Invest in a wider range of counterparties and/or for longer times	Interest income will be higher	Increased risk of losses from credit related defaults, but any such losses may be smaller
Borrow additional sums at long-term fixed interest rates	Debt interest costs will rise; this is unlikely to be offset by higher investment income	Higher investment balance leading to a higher impact in the event of a default; however long-term interest costs may be more certain
Borrow short-term or variable loans instead of long-term fixed rates	Debt interest costs will initially be lower	Increases in debt interest costs will be broadly offset by rising investment income in the medium term, but long-term costs may be less certain
Reduce level of borrowing	Saving on debt interest is likely to exceed lost investment income	Reduced investment balance leading to a lower impact in the event of a default; however long-term interest costs may be less certain

Appendix 1 – Arlingclose Economic & Interest Rate Forecast – December 2024**Underlying assumptions:**

- As expected, the Monetary Policy Committee (MPC) held Bank Rate at 4.75% in December, although, with a 6-3 voting split and obvious concerns about economic growth, presented a much more dovish stance than had been expected given recent inflationary data.
- The Budget measures remain a concern for policymakers, for both growth and inflation. Additional government spending will boost demand in a constrained supply environment, while pushing up direct costs for employers. The short to medium-term inflationary effects will promote caution amongst policymakers.
- UK GDP recovered well in H1 2024 from technical recession, but underlying growth has petered out as the year has progressed. While government spending should boost GDP growth in 2025, private sector activity appears to be waning, partly due to Budget measures.
- Private sector wage growth and services inflation remain elevated; wage growth picked up sharply in October. The increase in employers' NICs, minimum and public sector wage levels could have wide ranging impacts on private sector employment demand and costs, but the near-term impact will be inflationary as these additional costs get passed to consumers.
- CPI inflation rates have risen due to higher energy prices and less favourable base effects. The current CPI rate of 2.6% could rise further in Q1 2025. The Bank of England (BoE) estimates the CPI rate at 2.7% by year end 2025 and to remain over target in 2026.
- The MPC re-emphasised that monetary policy will be eased gradually. Despite recent inflation-related data moving upwards or surprising to the upside, the minutes suggested a significant minority of policymakers are at least as worried about the flatlining UK economy.
- US government bond yields have risen following strong US data and uncertainty about the effects of Donald Trump's policies on the US economy, particularly in terms of inflation and monetary policy. The Federal Reserve pared back its expectations for rate cuts considering these issues. Higher US yields are also pushing up UK gilt yields, a relationship that will be maintained unless monetary policy in the UK and US diverges.

Forecast:

- In line with our forecast, Bank Rate was held at 4.75% in December.

Appendix H

- The MPC will reduce Bank Rate in a gradual manner. We see a rate cut in February 2025, followed by a cut alongside every Monetary Policy Report publication, to a low of 3.75%.
- Long-term gilt yields have risen to reflect both UK and US economic, monetary and fiscal policy expectations, and increases in bond supply. Volatility will remain elevated as the market digests incoming data for clues around the impact of policy changes.
- This uncertainty may also necessitate more frequent changes to our forecast than has been the case recently.
- The risks around the forecasts lie to the upside over the next 12 months but are broadly balanced in the medium term.

	Current	Mar-25	Jun-25	Sep-25	Dec-25	Mar-26	Jun-26	Sep-26	Dec-26	Mar-27	Jun-27	Sep-27	Dec-27
Official Bank Rate													
Upside risk	0.00	0.25	0.50	0.50	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75
Central Case	4.75	4.50	4.25	4.00	3.75	3.75	3.75	3.75	3.75	3.75	3.75	3.75	3.75
Downside risk	0.00	-0.25	-0.25	-0.50	-0.50	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75
3-month money market rate													
Upside risk	0.00	0.25	0.50	0.50	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75
Central Case	4.90	4.60	4.35	4.10	3.90	3.85	3.85	3.85	3.85	3.85	3.85	3.85	3.85
Downside risk	0.00	-0.25	-0.25	-0.50	-0.50	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75
5yr gilt yield													
Upside risk	0.00	0.70	0.80	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90
Central Case	4.34	4.30	4.20	4.10	4.00	3.90	3.90	3.95	4.00	4.05	4.05	4.05	4.05
Downside risk	0.00	-0.50	-0.60	-0.65	-0.65	-0.70	-0.70	-0.75	-0.75	-0.80	-0.80	-0.80	-0.80
10yr gilt yield													
Upside risk	0.00	0.70	0.80	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90
Central Case	4.56	4.55	4.45	4.30	4.20	4.20	4.20	4.20	4.25	4.25	4.25	4.25	4.25
Downside risk	0.00	-0.50	-0.60	-0.65	-0.65	-0.70	-0.70	-0.75	-0.75	-0.80	-0.80	-0.80	-0.80
20yr gilt yield													
Upside risk	0.00	0.70	0.80	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90
Central Case	5.05	5.00	4.90	4.80	4.70	4.65	4.65	4.65	4.65	4.65	4.65	4.65	4.65
Downside risk	0.00	-0.50	-0.60	-0.65	-0.65	-0.70	-0.70	-0.75	-0.75	-0.80	-0.80	-0.80	-0.80
50yr gilt yield													
Upside risk	0.00	0.70	0.80	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90
Central Case	4.52	4.70	4.60	4.50	4.40	4.35	4.35	4.35	4.35	4.35	4.35	4.35	4.35
Downside risk	0.00	-0.50	-0.60	-0.65	-0.65	-0.70	-0.70	-0.75	-0.75	-0.80	-0.80	-0.80	-0.80

PWLB Standard Rate (Maturity Loans) = Gilt yield + 1.00%

PWLB Certainty Rate (Maturity Loans) = Gilt yield + 0.80%

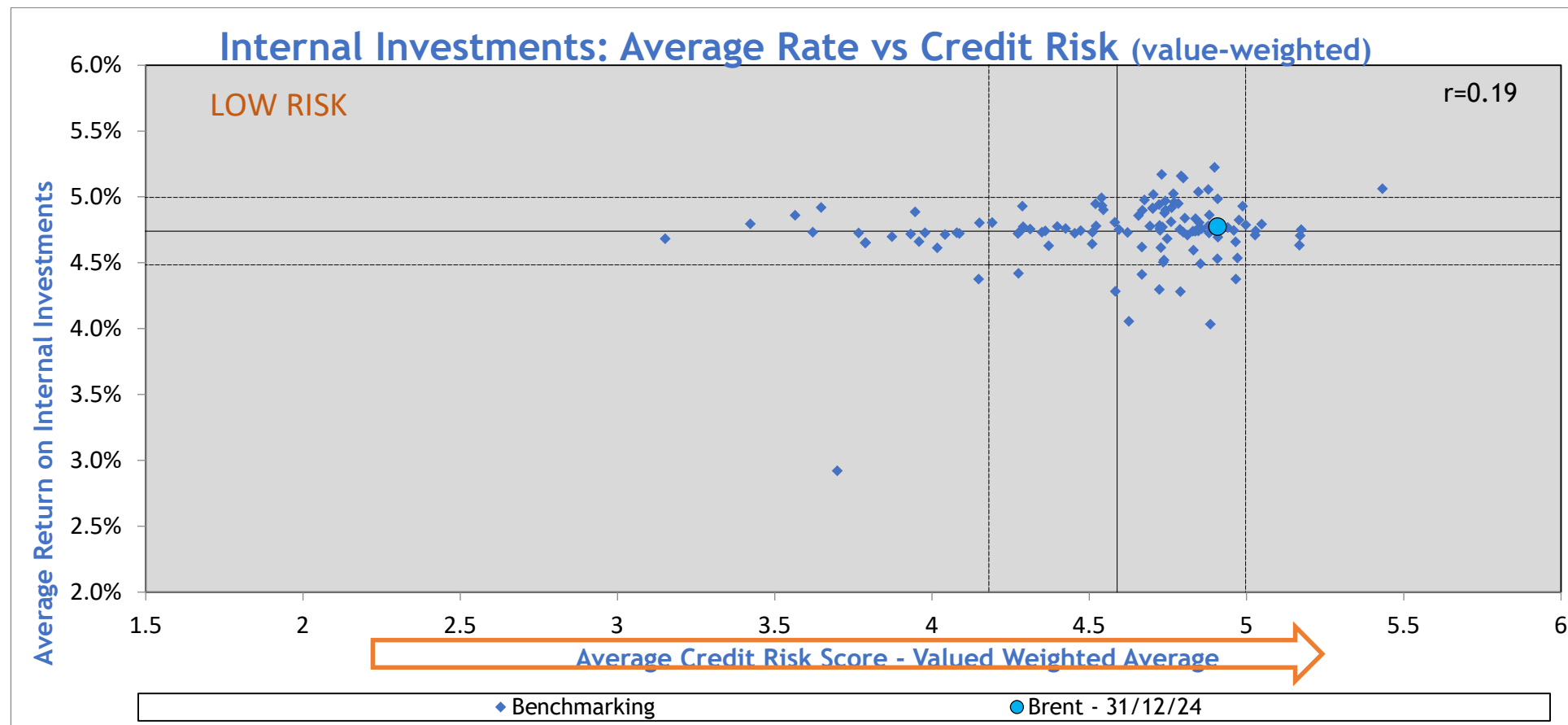
PWLB HRA Rate (Maturity Loans) = Gilt yield + 0.40%

UKIB Rate (Maturity Loans) = Gilt yield + 0.40%

Appendix 2 – Existing Investment & Debt Portfolio Position

	31/12/2024 Actual Portfolio £m	31/12/2024 Average Rate %
<u>Long-term borrowing:</u>		
Public Works Loan Board	608.8	4.02%
LOBO's	59.5	3.22%
Private Placement	95.0	
<u>Short-term borrowing:</u>		
Local Authorities	70.0	5.47%
Total External Borrowing	833.3	
<u>Other long-term liabilities:</u>		
Private Finance Initiative	24.8	-
Finance Leases	7.7	-
Total other long-term liabilities	32.5	
Total gross external debt	865.8	
<u>Treasury investments:</u>		
Money Market Funds	53.9	5.11%
Total treasury investments	53.9	
Net debt	811.9	

Appendix 3 – Internal Investments: Average Rate vs Credit Risk (December 2024)



Page 409

A credit rating of 4 is equivalent to credit score of AA-. The Council has a target rating of A which is a rating of 6. The current portfolio has a credit rating of A+ (Credit score 5) which exceeds our target rating.

This page is intentionally left blank

Minimum Revenue Provision Policy– 2025/26

1. Where the Council finances capital expenditure by debt, it must put aside resources to repay that debt in later years. The amount charged to the revenue budget for the repayment of debt is known as Minimum Revenue Provision (MRP), although there has been no statutory minimum since 2008. The Local Government Act 2003 requires the Council to have regard to the former Ministry of Housing, Communities and Local Government's Guidance on Minimum Revenue Provision (the MHCLG Guidance) most recently issued in April 2024.
2. The broad aim of the MHCLG Guidance is to ensure that capital expenditure is financed over a period that is reasonable commensurate with that over which the capital expenditure provides benefits.
3. The MHCLG Guidance requires Full Council (or a delegated body) to approve an MRP policy statement in advance of financial each year and recommends several options for calculating a prudent amount of MRP but does not preclude the use of other appropriate methods.
4. MRP is calculated by reference to the capital financing requirement (CFR) which is the total amount of past capital expenditure that has yet to be permanently financed, noting that debt must be repaid and therefore can only be a temporary form of funding. The CFR is calculated from the Council's balance sheet in accordance with the Chartered Institute of Public Finance and Accountancy's Prudential Code for Capital Expenditure in Local Authorities, 2021 Edition.
5. In accordance with the current guidance for the calculation of MRP the following policy for non-HRA assets will be applied with effect from 1 April 2025:
 - a. For supported borrowing, the Council will use the asset life method (Option 3) and an 'annuity' approach for calculating repayments. Based on the useful economic lives of the council's assets, a single annuity has been calculated, which results in the outstanding principal being repaid over the course of fifty years. The interest rate applied under this approach is 5.00% (fixed for the duration of the debt).
 - b. For prudential borrowing incurred after 1 April 2008, the Council will adopt Option 3, 'the asset life method', and an 'annuity' approach for calculating repayments. This option allows provision for repayment of principal to be made over the estimated life of the asset, stated in Table 1, and using an interest rate equal to the average relevant PWLB Annuity Rate for the year of expenditure. The use of the 'annuity' method is akin to a mortgage where the combined sum of principal and interest are equalised over the life of the asset.

6. Where the PWLB rate is unknown the MRP for future years prudential borrowing will be based on the assumed rate of borrowing for the respective asset.
7. MRP on purchases of freehold land will be charged over 50 years. MRP on expenditure not related to fixed assets but which has been capitalised by regulation or direction will be charged over 20 years.
8. MRP is charged in the financial year following the one in which the expenditure was incurred. Capital expenditure incurred during 2025/26 will not be subject to a MRP charge until 2026/27 (or later depending on when the asset becomes operational).
9. For newly constructed assets that have been financed through borrowing, MRP commences in the financial year following the year the asset first becomes operational. "Operational" is defined as when an asset transfers from "Assets under Construction" categorisation to an "Assets in Use" category under normal accounting rules.
10. In accordance with Regulations the Council reserves the right to charge a £nil MRP where:
 - a) the Capital Finance Requirement (CFR) is nil or negative on the last day of the preceding financial year; or
 - b) an overpayment has occurred in the previous financial year equivalent to the current year's charge. Where an offset of the previous year's overpayment takes place, this will be disclosed and reported to Full Council at the earliest opportunity.
11. In accordance with the 2024 revised Guidance, for capital expenditure on loans to third parties which were made primarily for financial return rather than direct service purposes, MRP will be charged in accordance with the policy for the assets funded by the loan, including where appropriate, delaying MRP until the year after the assets become operational. This MRP charge will be reduced by the value any repayments of loan principal received during in the year, with the capital receipts so arising applied to finance the expenditure instead.
12. For capital expenditure on loans to third parties which were made primarily for service purposes, the Council will make nil MRP except as detailed below for expected credit losses. Instead, the Council will apply the capital receipts arising from the repayments of the loan principal to finance the expenditure in the year they are received.

13. For capital loans made on or after 7th May 2024 where an expected credit loss is recognised during the year, the MRP charge in respect of the loan will be no lower than the loss recognised. Where expected credit losses are reversed, for example on the eventual repayment of the loan, this will be treated as an overpayment.
14. For capital loans made before 7th May 2024 and for loans where expected credit losses are not applicable, where a shortfall in capital receipts is anticipated, MRP will be charged to cover that shortfall over the remaining life of the assets funded by the loan.
15. For assets acquired by leases or the Private Finance Initiative, MRP will be determined as being equal to the element of the rent or charge that goes to write down the balance sheet liability.
16. Where former operating leases have been brought onto the balance sheet due to the adoption of the IFRS 16 Leases accounting standard, and the asset values have been adjusted for accruals, prepayments, premiums and/or incentives, then the annual MRP charges will be adjusted so that the overall charge for MRP over the life of the lease reflects the value of the right-of-use asset recognised on transition rather than the liability.
17. MRP will include a charge equal to any capital lifecycle additions within the lease.
18. No MRP will be charged in respect of assets held within the Housing Revenue Account but depreciation on those assets will be charged instead in line with regulations.
19. The Council reserves the right to make a voluntary MRP to accelerate the repayment of debt.
20. The asset lives which will be applied to different classes of assets are shown in table 1, however, the Council reserves the right to determine useful life periods and prudent MRP in exceptional circumstances where the recommendations of the guidance would not be appropriate.

Table 1: Asset lives.

Asset Type	Years
Vehicles and equipment	5 to 10 years
Highway Infrastructure Assets	25 years
Acquisition of or enhancement to buildings	30 to 40 years
New construction	50 years
Purchase of land	50 years

21. Asset lives will only exceed the maximum useful life of 50 years as stated under the Regulations for debt write down in two scenarios:

- (a) where the Council has an opinion from an appropriately qualified professional advisor that an asset will deliver service functionality for more than 50 years then the life suggested by its professional advisor will be used; and
- (b) for a lease or PFI asset, where the length of the lease/PFI contract exceeds 50 years. In this case the length of the lease/PFI contract will be used.

22. Proceeds from the sale of capital assets are classed as capital receipts and are typically used to finance new capital expenditure. Where the Council decides instead to use capital receipts to repay debt and hence reduce the CFR, the calculation of MRP will be adjusted as follows:

- Capital receipts arising on the repayment of principal on capital loans to third parties will be used to lower the MRP charge in respect of the same loans in the year of receipt, if any.
- Capital receipts arising on the repayment of principal on finance lease receivables will be used to lower the MRP charge in respect of the acquisition of the asset subject to the lease in the year of receipt, if any.
- Capital receipts arising from other assets which form an identified part of the Council's MRP calculations will be used to reduce the MRP charge in respect of the same assets over their remaining useful lives, starting in the year after the receipt is applied.

- Any other capital receipts applied to repay debt will be used to reduce MRP in ten equal instalments starting in the year after receipt is applied.

23. Based on the Council's latest estimate of its capital financing requirement (CFR) on 31st March 2025, the MRP charge for 2025/26 on prudential borrowing; PFI schemes; and leases has been set at £21.7m. Service loan repayments of £0.9m is also expected in 2025/26 which will also reduce the respective CFR.

This page is intentionally left blank

BRENT RESERVES STRATEGY

What are reserves?

CIPFA states in the *Financial Management Code* that “the aim of the authority’s financial reserves is to provide funding for investment in future activities and to act as a safety net in case of short-term financial challenges.”

What is a reserves strategy?

The *Reserves Strategy* defines the level and purposes for which the Council holds reserves. It consists of three key elements:

1. **Strategy:** what the Council is seeking to achieve through holding reserves;
2. **Financial Planning:** linking the level of reserves with plans for their use over the period of *Medium Term Financial Strategy* (MTFS); and
3. **Operational Framework:** how the Council determines the level of reserves, manages those reserves and plans for their use in line with best practice and statutory requirements.

Together these elements set out the Council’s ambition for reserves, the nature of that ambition and how we will provide assurance.

STRATEGY

Why do we need a reserves strategy?

The Council plans its finances over the short term, medium and long term so that it has adequate resources to deliver services for the residents of the borough. As a large, complex organisation, there will always be variations between our actual spending/income and our plans due to variations in demand, demographic change, changes in costs and the funding decisions of third parties as well as the need to deliver projects and investments spanning more than one financial year.

To ensure we can manage these financial risks, whilst being able to maintain services, requires that the Authority holds funds in reserve to meet these costs as and when they arise and to deal with any unexpected emergency that may occur. A reserves strategy enables us to do this in a planned way.

Do we have to have a reserves strategy?

The requirement for financial reserves is acknowledged in statute. Sections 32 and 43 of the *Local Government Act 1992* require precepting authorities and billing authorities in England and Wales to have regard to the level of reserves needed for meeting estimated future expenditure when calculating the budget requirement.

There are other safeguards in place that help to prevent the Council from over-committing itself financially. These include:

Appendix J (i)

- a) The balanced budget requirement (*Local Government Act 1992 s32 and s43*);
- b) Chief Finance Officer's duty to report on the robustness of estimates and adequacy of reserves (*Local Government Act 2003 s25*) when the Council is considering the budget requirement;
- c) Legislative requirement to make arrangements for the proper administration of the Council's financial affairs and that the Chief Finance Officer has responsibility for the administration of those affairs (*Local Government Act 1972 s151*);
- d) The requirements of the *Prudential Code*;
- e) Auditors' consideration of whether the audited body has established adequate arrangements to ensure that its financial position is sustainable. Financial sustainability is covered as part of the *Value for Money Audit*; and
- f) CIPFA's *Financial Management Code* requirement that the effective management of reserves is reviewed as part of a formal Financial Resilience Assessment (FRA).

These requirements are reinforced by section 114 of the *Local Government Finance Act 1988*, which requires the Chief Finance Officer to report if there is likely to be unlawful expenditure or an unbalanced budget. This would include situations where reserves have become seriously depleted and it is forecast that the Council will not have the resources to meet its expenditure in a particular financial year.

Whilst it is primarily the responsibility of the Chief Finance Officer to maintain a sound financial position, the external auditors will, as part of their wider responsibilities, consider whether the audited body has established adequate arrangements to ensure that its financial position is soundly based. However, it is not the responsibility of the external auditors to prescribe the optimum or minimum level of reserves for the Council.

FINANCIAL PLANNING

How does it fit with our other strategies?

The *Reserves Strategy* is part of a suite of supporting strategies that supplement the *Borough Plan* and the *Medium Term Financial Strategy*. These detailed strategies provide an additional level of granularity that helps to create a bridge between the over-arching strategies and operational delivery plans

CIPFA's *Prudential Code* requires the Chief Finance Officer to have regard to affordability when making recommendations about the future capital programme. Such consideration includes the level of long-term revenue commitments. Indeed, in considering the affordability of its capital plans, the Council is required to consider all of the resources available to it and estimated for the future, together with the totality of its capital plans and revenue forecasts for the forthcoming year and the following two years.

There is a requirement for three-year revenue forecasts across the public sector and this is achieved through the *Medium Term Financial Strategy* and the annual budget.

The 2021 Autumn Budget and Comprehensive Spending Review (CSR21) provided details of proposed government support for a three-year timeframe, but with only a one-year detailed financial settlement. This creates uncertainty over future funding and provides limited information for planning over the medium term the use of balances and reserves.

How are the level of reserves set?

CIPFA's Local Authority Accounting Panel does not accept that there is a case for introducing a generally acceptable minimum level of reserves. Instead, it is for the Council, on the advice of its Chief Finance Officer, to make its own judgement on such matters, taking into account all relevant local circumstances. What are relevant circumstances will vary between areas. A well-managed organisation with a prudent approach to budgeting should be able to operate with a minimal level of general reserves which are appropriate to the risks (both internal and external) to which it is exposed. In assessing the appropriate level of reserves, a well-managed organisation will ensure that the reserves are not only adequate, but also are necessary.

It is worth noting that not all reserves are usable. Some reserves arise out of the interaction of legislation and proper accounting practice. These are termed 'unusable reserves' as they cannot be used for any other purpose. They are not considered further as there is no need to set their level and no discretion over their creation, purpose or usage.

Types of Reserve

When reviewing the medium term financial plans and preparing the annual budgets, the establishment and maintenance of reserves should be considered. These can be held for five main purposes:

- a) **Working Balance** - to help cushion the impact of uneven cash flows and avoid unnecessary temporary borrowing – this forms part of general reserves.
- b) **Contingency Reserve** - to cushion the impact of unexpected events or emergencies – this forms part of general reserves.
- c) **Sinking Fund and Smoothing Reserves** – these allow a response to uncertainty in the economic climate and provide assurance on the safety of the Council's financial assets. These are closely linked with the *Treasury Management Strategy* and *Capital Strategy* - these form part of general reserves.
- d) **Statutory and Ring-fenced Reserves** – these are held for specific purposes, often set by statute. Examples include grant funding where the expenditure has yet to be incurred (Capital Grants Unapplied), the HRA Balance and the Schools Balances. Although these are legally part of the general reserves, the restrictions and limitations on their use mean that they should be accounted for separately and not viewed as generally usable.
- e) **Earmarked Reserves** – these represent a means of building up funds to meet known or predicted requirements, such as planned

Appendix J (i)

investment, capital projects and change programmes; earmarked reserves are accounted for separately and viewed as largely not generally usable. They remain legally part of the general reserves.

In addition the Council holds the following two usable reserves:

- a) **Major Repairs Reserve** – this reserve records the unspent amount of HRA balances for capital financing purposes in accordance with statutory requirements for the reserve. This is an HRA specific reserve.
- b) **Capital Receipts Reserve** – this reserve holds the proceeds from the sale of assets, and can only be used for those purposes specified in the capital finance and accounting regulations.

OPERATIONAL FRAMEWORK

When establishing reserves, there needs to be compliance with the *Code of Practice on Local Authority Accounting* and in particular, the need to distinguish between reserves and provisions.

The split of reserves into five categories is helpful as each category has its own nature, purpose and planned usage that can be used to determine the required level of reserves.

Working Balance

The cash flow forecast is key to understanding the level of reserve required to cushion the impact of uneven cash flows. The overall size of the net expenditure budget should be used as the reference point for determining the percentage required to be retained as the working balance.

Contingency Reserve

Determining a suitable level of reserve to cover the unexpected is an inexact science. At best this will be an estimate created using risk management techniques to determine the likelihood and impact of potentially disastrous events. Past experience demonstrates the ability of the Council to deliver savings, while dealing with resource reductions and demographic and other demand changes. How these issues have been tackled without overspending the budget will be an important consideration in deciding how much needs to be set aside in reserves as contingency. A reasonableness check also needs to be considered - retaining adequate funds to cover a calamitous event such as a second pandemic may be overly cautious and therefore not prudent as it ties up scarce resources unnecessarily. The contingency requirement should be referenced to a percentage of net expenditure.

The first two types of reserve, although different in nature, involve dealing with the unplanned and unexpected. The Council also hold reserves for planned purposes. It defines these usable reserves under the following headings:

Appendix J (i)

- Ring-fenced and Statutory
 - HRA
 - Schools
 - COVID
- Capital
- Investment
- Sinking and Smoothing
- Service reserves
- Transformation
- General Fund Balance

When considering reserves held for specific purposes that could be freely utilised to fund unexpected expenditure, only the final three headings (service reserves, transformation and the general fund balance) can be used without limitation. The other reserves are either restricted to a specific use or already committed. Theoretically, the General Fund balance could be viewed as the working balance, whilst the other two types of reserve constitute amounts available for contingency purposes.

As stated already, the reference point for determining the target level for the working balance and contingency reserves should be a percentage of net expenditure. The end result will be a single target percentage of net expenditure that should be held. Although CIPFA oppose an arbitrary figure, 5% is widely used in local authorities as such a target. This is viewed as a starting point and tested for adequacy by considering past data and future forecasts. When considering past experience, use has been made of both benchmarking data for other London boroughs, provided by London Councils and CIPFA's Financial Resilience Index, and historic data for the Council. The comparative data shows that the level of reserves at Brent is good and provides strong foundations for long-term financial sustainability.

An analysis has been undertaken of the percentage of over- or under-spend that the year-end outturn represents of the Council's net budget. This shows that at no point in the last 20 years did any year-end overspend equate to as much as 2% of the net expenditure budget. Looking to the future, funding uncertainty, cost drivers, demand pressures and demographic changes have been considered. Further factors such as the effects of COVID-19 and the current high levels of inflation have also been taken into account. The conclusion of this work is that 5% is a reasonable minimum level of general reserves based on past experience and future expectations.

Uncertainty and Smoothing Reserves

At Brent, reserves for insurance, redundancy and welfare reform are examples of this type of reserve. Each is set on the basis of an individual calculation that takes in to account relevant factors and local circumstances. The *Reserves Strategy* recommends that this policy continues with a requirement to demonstrate need and

adequacy are a part of the working paper for the calculation of any reserve under this heading.

Statutory and Ring-fenced Reserves

As these arise from circumstances largely prescribed by statute, there is no need to provide further policy on their level or use. The Council divides these reserves between s106/CIL, Ring-fenced and capital reserves. They are presented in the accounts as part of the earmarked reserves.

Earmarked Reserves

Under this heading fall service specific reserves including carry forwards and more general amounts set aside for transformation, service pressures and future funding risks. The need for and level of these reserves should be justified by a calculation demonstrating the requirement for the reserve, its intended purpose, how its level has been determined and plans for its profiled release. This should be aligned with corporate plans and strategies such as the *Borough Plan*, the *MTFS* and the *Capital Strategy* as appropriate. All earmarked reserves should be reviewed annually as part of the closure of the accounts.

MONITORING

The level of all reserves is kept under continuous review by the Director of Finance. This is achieved through revisions to the *Medium Term Financial Strategy* and the budget monitoring reports. Periodic updates will be provided to the Cabinet and the Audit and Standards Advisory Committee. The planned level of reserves will be reported to the Council annually via the *Budget Report*.

USE OF RESERVES

The maintenance and use of reserves play a key role in long-term financial sustainability. Just as the creation and maintenance of reserves arises in a structured way through the Council's financial planning process, so the release of reserves needs to be subject to a similarly planned and controlled process. Such a process is provided by the *Scheme of Transfers and Virements*, which sets out specific requirements for the use of reserves. The main points are:

1. Reserves cannot be used to fund overspends without a plan

Section 3 of the Scheme of Transfers and Virements requires that "Reserves must not be used to fund ongoing overspends unless there is an agreed, realistic plan to eliminate the overspend before the reserve is exhausted (this applies to all reserves, both earmarked and non-earmarked). The Director of Finance must review planned uses of reserves to ensure that these are not being used to hide or obscure systemic overspends. The Director of Finance must report to Full Council report any areas with inadequate plans to address overspends."

Appendix J (i)

2. Budget report must identify the reserves against which overspends can be charged

Section 3 of the Scheme of Transfers and Virements states that “In certain circumstances where such overspends on Funds arise, there is a choice as to which reserve the charge should be made. The annual Budget Report will identify which reserves overspends will and will not be charged against, for approval by Full Council. In the event of inadequate reserves to fund overspends, the Director of Finance may have to use additional reserves to fund overspends, any such action is to be reported to Full Council. “

3. Budget report must specify how reserves are to be used

Section 6 of the Scheme of Transfers and Virements directs that “Reserves have been established to aid the smooth running of the Council’s finances, and it will be normal to charge costs to those reserves subject to financial regulations and local procedures and policies. Further, the council has capital monies, such as capital grants and capital receipts held in the council’s useable reserves. The Schedule of Earmarked Reserves in the Budget Report must specify how the council’s useable reserves are to be used, including if they can be used to fund overspends, and this needs to be approved by Full Council as part of the Budget Report. Officers may make transfers from these reserves up to the amounts in the Budget Report for the specified purposes.”

This page is intentionally left blank

APPENDIX K - RESERVES FORECAST

BRENT RESERVES		PURPOSE AND PLANNED USAGE	Actual 31/03/2024 £m	Movement £m	Forecast 31/03/2025 £m	Movement £m	Forecast 31/03/2026 £m																
BALANCES																							
General Fund Balance		This both provides the Council's working balance and represents an amount held against unexpected overspends or failure to identify sufficient savings to balance the budget in year. On a net budget of £387m, even a 2% variance would rapidly erode this and would leave the Council dangerously exposed. For this reason the Council aims to retain at least 5% of its net expenditure as a contingency reserve.	(20.3)	0.0	(20.3)	(0.5)	(20.8)																
Schools Balances		Balance carried forward of Dedicated Schools Grant delegated to individual schools. Forecast to decline in response to school funding pressures and not directly in the control of the Council.	(13.1)	3.8	(9.3)	2.0	(7.3)																
Housing Revenue Account Balance		This is the accumulated surplus of income over expenditure for the HRA. This can only be used for the HRA. The balance is used as a contingency against overspending and unexpected events that affect the HRA.	(2.4)	0.0	(2.4)	0.0	(2.4)																
TOTAL BALANCES			(35.7)	3.8	(32.0)	1.5	(30.5)																
CAPITAL RESERVES																							
Capital Receipts Reserve		The proceeds from the disposal of land or other assets. Capital receipts can only be used to finance new capital expenditure, to provide loans or grants or to repay debt. They cannot be used to fund revenue expenditure.	(23.9)	11.2	(12.7)	0.0	(12.7)																
Major Repairs Reserve		The unspent amount of the Major Repairs Allowance provided for capital renewal of HRA properties.	(8.5)	0.0	(8.5)	0.0	(8.5)																
Capital Grants Unapplied		Capital grants received from central government agencies unapplied as not yet used to fund capital projects. Major elements include Basic Needs Grant for additional school places, School Condition Grants, DFG – Disabled Facilities Grant and others.	(112.3)	33.0	(79.3)	40.3	(39.0)																
TOTAL CAPITAL RESERVES			(144.7)	44.2	(100.5)	40.3	(60.2)																
EARMARKED RESERVES																							
<i>Capital and other statutorily ring-fenced reserves</i>																							
S106/Community Infrastructure Levy (CIL)		<p>This reserve is made up of the Community Infrastructure Levy (CIL) and S106 planning contributions made under legally binding agreements. The accumulated S106/CIL receipts that have not yet been spent are committed to finance planned capital expenditure, as set out in the <i>Capital Strategy</i>.</p> <p>Community Infrastructure Levy is made up of an amount paid over to the Mayor of London on a quarterly basis (MCIL), and an amount retained by the Borough (BCIL). BCIL is divided into Strategic CIL (SCIL) for use borough-wide, and a local amount termed Neighbourhood CIL (NCIL). A Cabinet decision is required to allocate Strategic CIL to finance new capital expenditure before it can be added to the Brent capital programme. There is also an allowance for administration costs which can be deducted from CIL.</p> <p>The S106 reserve balance at 31 March 2024 was £17.5m. The majority of this is committed to financing capital expenditure, with some revenue projects also benefitting. The reserve must be used to offset the impact of new development (there are some very specific exceptions which apply to some older S106 agreements, but these will invariably be very restrictive in any event). There are limits to the discretion as to what S106 contributions can subsequently be used to finance which are written into the individual S106 legal agreements.</p> <p>The balance on each category at 31 March 2024 was:</p> <table style="margin-left: 40px;"> <tr><td></td><td>£m</td></tr> <tr><td>SCIL</td><td>(159.0)</td></tr> <tr><td>NCIL</td><td>(19.6)</td></tr> <tr><td>BCIL</td><td>(178.6)</td></tr> <tr><td>MCIL</td><td>(3.9)</td></tr> <tr><td>Admin</td><td>(2.5)</td></tr> <tr><td>Total CIL</td><td>(185.0)</td></tr> <tr><td>S106</td><td>(17.5)</td></tr> </table>		£m	SCIL	(159.0)	NCIL	(19.6)	BCIL	(178.6)	MCIL	(3.9)	Admin	(2.5)	Total CIL	(185.0)	S106	(17.5)	(202.4)	27.5	(174.9)	13.8	(161.1)
	£m																						
SCIL	(159.0)																						
NCIL	(19.6)																						
BCIL	(178.6)																						
MCIL	(3.9)																						
Admin	(2.5)																						
Total CIL	(185.0)																						
S106	(17.5)																						

APPENDIX K - RESERVES FORECAST

BRENT RESERVES		PURPOSE AND PLANNED USAGE	Actual 31/03/2024 £m	Movement £m	Forecast 31/03/2025 £m	Movement £m	Forecast 31/03/2026 £m
		Total S106 & CIL (202.4)					
<i>Ring-fenced</i>							
HMO Licensing		Income is received on a five yearly cycle and released annually to meet expenditure. The service does not have a mainstream budget for this activity, and the reserve is ring-fenced by law and operationally required to match the different cycles of income and expenditure. When setting fees regard must be had to the European Union Services Directive. Fees must be reasonable and proportionate and cannot be set to act as an economic deterrent to deter certain business types from operating within an area. However, fees can be set at a level enabling the authorities to recover from licensed operators the full costs of managing and enforcing the licensing scheme, including the cost of investigating and prosecuting those operating without the necessary licence.	(4.0)	0.0	(4.0)	0.0	(4.0)
HRA Earmarked		This reserve has been set aside to cover contingent liabilities for insurance claims and other possible pressures.	(2.7)	0.0	(2.7)	0.0	(2.7)
Public Health		Reflects carry forward of ring fenced funds for Public Health	(10.0)	1.1	(8.9)	2.1	(6.8)
Edward Harvist Trust		Brent distributes grant monies from the Edward Harvist Trust	(0.1)	0.0	(0.1)	0.0	(0.1)
Total Ring-fenced			(16.9)	1.1	(15.8)	2.1	(13.7)
<i>Capital Finance Related</i>							
South Kilburn		This reserve smooths annual payments on the programme, which is any given year may be more or less than the budget. It is allocated to South Kilburn and, assuming that the remaining 7 years of the programme run to budget, will be spent in full.	(5.7)	0.0	(5.7)	0.0	(5.7)
General Fund Capital funding		This reserve is used to finance existing or future expenditure on projects within the Capital Programme.	(52.9)	32.0	(20.9)	0.0	(20.9)
Total Capital Finance Related			(58.6)	32.0	(26.6)	0.0	(26.6)
Total Capital and other statutorily ring-fenced reserves			(278.0)	60.6	(217.4)	15.9	(201.5)
<i>Committed reserves</i>							
<i>Sinking fund and other smoothing reserves</i>							
PFI		In the financial models for the council's PFIs, income and expenditure do not match in any given year. This is normal under such arrangements, as the PFI contractor is bearing the up-front cost of the capital investment. This reserve is ring-fenced to provide funds to cover this mismatch.	(9.4)	0.9	(8.4)	0.2	(8.2)
UC staffing		This reserve is fully committed to paying for staff working on Housing Benefit claims. As more cases transfer to Universal Credit, managed by the DWP, less staff will be required to work on Housing Benefit claims.	(0.4)	0.4	(0.0)	0.0	(0.0)
Redundancy		The reserve is used to fund redundancy costs. Without it, many planned savings would take a year longer to start delivering their benefits (assuming that the average redundancy cost is about one year's salary).	(1.7)	0.0	(1.7)	0.0	(1.7)
Insurance		The insurance reserve sets aside funds to cover self-insured items and any excesses on externally insured cover. This differs from the Insurance provision which covers amounts set aside upon review by the Council's insurance actuary to make sure that we have enough to deal with the pipeline of known cases that are not yet settled.	(5.3)	0.4	(4.9)	0.0	(4.9)

APPENDIX K - RESERVES FORECAST

BRENT RESERVES		PURPOSE AND PLANNED USAGE	Actual 31/03/2024 £m	Movement £m	Forecast 31/03/2025 £m	Movement £m	Forecast 31/03/2026 £m
Collection Fund Reserve		This reserve is used to manage volatility in the amounts retained within the council tax and business rates retention regimes, in particular the impact of backdated revaluation appeals, appeals relating to Material Change of Circumstances and collection rates.	(2.8)	(8.0)	(10.8)	7.6	(3.2)
Total Sinking fund and other smoothing reserves			(19.6)	(6.3)	(25.9)	7.8	(18.1)
Total Committed reserves			(19.6)	(6.3)	(25.9)	7.8	(18.1)
Other earmarked reserves							
<i>Service reserves</i>							
Service Reform and Strategy		These reserves are comprised of Brent NHS S256 Agreement - Joint Investment Funding, Agreement with the Council for joint programmes across health and social care. This also includes balance of grants for CNWL Mental Health Supplement and Reablement and LD DHSC Community Discharge Grant	(8.6)	1.6	(7.1)	0.7	(6.4)
		These reserves are mainly comprised of:					
		- £3.2m for Homes for Ukraine, providing support services to refugees from Ukraine					
Children, Young People and Community Development		'- £1.9m which relates to the ring-fenced DSG held against this reserve. The overall DSG is in deficit, however the DfE requires the historic deficit balance against the DSG to be held against the unusable reserves i.e. £13.2m carried forward from 2023/24 and at the removal of the statutory override, the £1.9m will be used in the future to set balanced DSG schools' budgets.	(9.0)	3.8	(5.1)	0.0	(5.1)
		- £3.9m of this reserve is linked to a combination of previous and current specific government grants, including the Youth Justice fund grant, troubled families programme and Best Start for life programme.					

APPENDIX K - RESERVES FORECAST

BRENT RESERVES	PURPOSE AND PLANNED USAGE	Actual 31/03/2024 £m	Movement £m	Forecast 31/03/2025 £m	Movement £m	Forecast 31/03/2026 £m
	<p>This reserve is comprised of:</p> <p>Council Tax Improvement project (covers system replacement) (0.1)</p> <p>Cemeteries Maintenance: to fund the long term maintenance of cemeteries. Some fees & charges income in the years that burial plots are sold are set aside to fund a proportion of the maintenance in the future – (i) any large maintenance expenditure that cannot be funded by in-year income and (ii) ongoing maintenance costs once cemeteries are full and no longer receiving income (2.9)</p> <p>Residents and Housing Services</p> <p>Transformation: monies set aside to fund a contribution to investments in transformational project work to improve the department's ability to generate future income. (0.7)</p> <p>Various ringfenced government grants for housing and libraries (1.6)</p> <p style="text-align: right;"><u>(5.3)</u></p>	(5.3)	3.1	(2.2)	0.0	(2.2)
	<p>Neighbourhoods & Regeneration</p> <p>These reserves are comprised of reserves for Neighbourhoods & Regeneration, covering a range of services. This includes Proceeds of Crime Act (POCA) funds which is ringfenced and used to fund financial investigators and enforcement officers. There are also reserves that were created to cover the embedding of the new contracts in Public Realm, it is anticipated these will be used within the next 2 years.</p>	(11.1)	1.5	(9.6)	0.0	(9.6)
	<p>Finance and Resources</p> <p>These reserves are comprised of reserves held for investigations, elections and an improvement project in Governance.</p>	(2.1)	(0.5)	(2.5)	0.0	(2.5)
	Total Service reserves	(36.0)	9.5	(26.5)	0.7	(25.8)

APPENDIX K - RESERVES FORECAST

BRENT RESERVES	PURPOSE AND PLANNED USAGE	Actual 31/03/2024 £m	Movement £m	Forecast 31/03/2025 £m	Movement £m	Forecast 31/03/2026 £m
<i>Budget stabilisation</i>						
Future funding risks	This is a general reserve to cover any future service pressures, such as demand pressures and demographic changes, which are in excess of any provision already made in the annual budget and future funding risks relating to the funding review and business rates reset to be carried out by central government in 2026/27.	(8.4)	(2.4)	(10.7)	(3.0)	(13.7)
Transformation	This is a reserve to cover projects which will bring future financial benefit to the Council, including but not limited to: transformation projects, change projects and invest-to-save projects.	(1.0)	0.0	(1.0)	0.5	(0.5)
Total Budget stabilisation		(9.4)	(2.4)	(11.7)	(2.5)	(14.2)
Total other earmarked reserves		(45.4)	7.2	(38.3)	(1.8)	(40.1)
TOTAL EARMARKED RESERVES		(342.9)	61.4	(281.5)	21.9	(259.6)
GRAND TOTAL		(523.3)	109.4	(413.9)	63.7	(350.2)

This page is intentionally left blank

Brent Council Fees and Charges Policy

1. Introduction

- 1.1. By using its powers to charge for goods and services and imposing fines, fixed penalties and other such financial sanctions, Brent Council is able to generate additional income to support investment in services and/or reduce the overall level of expenditure to be met by local taxpayers.
- 1.2. The aim of this Fees and Charges Policy is to ensure that the Council makes use of all the powers available to it in order to recover the full cost of providing services. In using these powers however, the Council will wish to take care to ensure that the consequences of charging on individuals, the wider aims of the Council itself and / or organisations do not adversely impact on those who are vulnerable or in difficulties.

2. Background

- 2.1. The overriding aim of the charging policy is to maximise income generation and collection to enhance the social and economic wellbeing of the community the council serves, whilst ensuring a fair price for all services reflecting the ability of the community to pay and the relative demand for the service. Maximisation of income, following a decision to charge, is also dependent on a charge being raised and that amount being collected, both in a timely way.

Legal Position

- 2.2. The majority of the Council's statutory services, Building Control being a key exception, are funded directly from the Council's other main sources of revenue, i.e. government grants and local taxation.
- 2.3. Income received by Brent from fees and charges is generated by both statutory and discretionary services. Where fees and charges apply to statutory services these are often set nationally, for example, some planning and licensing fees.
- 2.4. The remaining income generating services where the Council levies fees and charges are of a discretionary nature. Discretionary services are those that an authority has the power to provide but is not obliged to. They include services provided directly to the public in general such as leisure services as well as charges for the costs incurred by the council (such as legal costs) when entering into planning or highways agreements with specific persons.
- 2.5. The legal powers that the Council has to raise fees and charges are set out in the final section of this policy.

3. Managers' Guidance

Overview

- 3.1. The Managers' Guidance has been written to provide information to managers in Brent Council responsible for applying fees and charges to goods and services delivered. The aim is to encourage a consistent and cost effective approach to the setting of charges for services provided by:
 - a. Specifying the process and frequency for reviewing existing charges for all areas of the council's work for which charges could in principle be set
 - b. Providing guidance on the factors that need to be taken into consideration

- when charges are being reviewed
- c. Requiring more active use of market intelligence when setting charges
- d. Establishing parameters for calculating different levels of charges
- e. Recommending the criteria for applying concessions or discounted charges consistently across the council

Cost of Living Crisis

- 3.2. In response to the cost of living crisis facing Brent's residents and the current high levels of economic uncertainty, supplementary guidance was issued to managers on how to set fees and charges for 2025/26. This recognised that whilst the Council was facing substantial increases in costs, Brent's residents were also facing a similarly challenging economic environment. Whilst a freeze in fees and charges increases would not be affordable, the guidance advised managers to take a holistic approach which reviewed any proposed price increases in the round considering the effect on both the Council and its customers.
- 3.3. The supplementary guidance recommended a step-by-step approach to considering the extent to which the cost of providing the service was increasing for the council and the cost pressures faced by the Council's customers. These factors and any other pertinent issues would then to be considered together to determine an appropriate increase in prices. This approach permits managers to avoid following the normal full cost recovery approach if they can manage a lower level of increase within their budget. The intention was that for most fees and charges, where the Council has freedom to set the increase, the proposed increase will be below current levels of inflation.
- 3.4. The cost of living crisis will be considered when setting fees and charges next year, but at this stage it is unclear whether there will need to be any departure from the normal process to set price increases.

Calculation of Fees and Charges

- 3.5. Fees and charges raised must be based on the full cost of the service. Charges cannot be set at a level to recover more than cost if that is all the Council has the legal power to do, but the definition of cost includes direct costs of service provision together with overhead and central costs. The cost recovery limit applies to the overwhelming majority of services which the Council can set a charge for. If, however, the Council has the legal power to do so careful consideration should be given to charging more than the full cost of the service. For example, charging could be used as a tool to manage excess demand for limited spaces on leisure centre classes. In overview there are 3 ways in which fees and charges may be set:
- a. Fees and charges prescribed by legislation, usually in a regulatory context, and varied from time to time which the person liable has an obligation to pay;
 - b. Fees and charges reviewed and set by members (e.g. Individual Cabinet Members, Cabinet or Full Council) from time to time (usually annually); and
 - c. Fees and charges reviewed and set by officers from time to time acting under delegated powers.
- 3.6. As part of the annual budget cycle each department will carry out a recalculation of existing fees and charges together with opportunities to raise additional income from new areas of charging, and present proposals for revised charges.

Approvals

- 3.7. In broad terms setting fees for regulatory services (i.e. licensing, planning, etc) are non-executive functions. These therefore need to be submitted to Full Council for approval. Full Council can, however, delegate this function to a committee, officer etc.
- 3.8. Fees and charges for discretionary services are usually executive functions and therefore need to be approved by Cabinet or Cabinet Members. Cabinet and Cabinet Members can, however delegate this function.

Concessionary Charging

- 3.9. The purpose of offering concessions must be to support council priorities. Generally the reasons for operating concessionary charges will fall into one of two categories: to influence the level of demand for a service or to reflect the circumstances of service users. Concessions must also be reviewed at least on an annual basis, to confirm both the level of subsidy and also their ongoing relevance.
- 3.10. The Finance Department will maintain a list of concessions in operation and keep under review requests for concessions to be offered. For customer / clients who cannot pay, action must be taken to ensure that there are sufficient safeguards in place to allow access to service, and that appropriate steps are taken to recognise the realistic payment capacity of vulnerable individuals.
- 3.11. Concessionary charges should not normally apply at times when it would result in a loss of income from customers paying the full charge, unless prior approval has been given by a senior Council officer.

- 3.12. No concessions will be provided to non-Brent residents.

Education related services

- 3.13. With regards to education related services, services and packages will be based around the academic year and not on the municipal financial year.

VAT

- 3.14. Managers must ensure that the correct treatment of VAT is applied to the fees and charges they are responsible for. The correct treatment should be agreed with Finance in advance of application.

Other statutory requirements

- 3.15. Managers must also ensure that when setting fees and charges or reporting to members they are aware of any special statutory requirements that need to be complied with. For example, before changes to some fees and charges can be implemented, there may be a statutory requirement to consult and/or publish a notice in a local newspaper.

4. Payment Methods

- 4.1. All collection methods and payment terms must be effective, efficient and appropriate for the service. The preferred methods of payment are those direct to the bank such as direct debits and standing orders.
- 4.2. Wherever practical to do so payment for services provided should be sought in advance to minimise debt recovery issues.

- 4.3. The full cost recovery analysis will need to factor in the cost of processing payments and that some payment methods are preferred.

5. Equality impact Assessments

- 5.1. Under Section 149 of the Equality Act 2010, the Council has a duty when exercising its functions to have 'due regard' to the need to eliminate discrimination and other conduct prohibited under the Act and advance equality of opportunity and foster good relations between those who share a "protected characteristic" and those who do not. This is the public sector equality duty. The protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. 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.
- 5.2. Before the Council exercises its fees and charging powers, the impact on individuals or groups of individuals who share a protected characteristic must be carefully considered and properly factored into the decision making process using the Council's EA screening template.

6. Review of Policy

- 6.1. This Policy is to be reviewed a minimum of every two years to ensure consistency with wider council and departmental objectives and priorities.

7. Fees and Charges - Legal Powers

- 7.1. Under the Localism Act 2011 there is a general power of competence which explicitly gives councils the power to do anything that an individual can do which is not prohibited by other legislation. This activity can include **charging** (i.e. to recover the costs of providing a discretionary service which the person has agreed to) or can be undertaken for a commercial purpose (i.e. to generate efficiencies, surpluses and profits) through a special purpose trading company. This is what is more commonly known as **trading**. Charging and trading activities can be aimed at benefiting the Council, the borough or its local communities.
- 7.2. These powers are in addition to similar powers set out in the Local Government Act 2003. The 2003 Act empowers councils to charge for any discretionary services (i.e. services councils have the *power* to provide but do not have a *duty* to provide by law) on a cost recovery basis. For example, the Council could decide to provide a new discretionary service, that is an addition to or enhancement of a statutory service, and then charge for it.
- 7.3. The 2011 Act power and the 2003 Act power cannot be used where charging is prohibited or where another specific charging regime applies. Statutory guidance published in 2003 outlines how costs and charges should be established and that guidance remains in force (see: '*General Power for Best Value Authorities to Charge for Discretionary Services*', ODPM, 2003). The Council must have regard to the guidance when charging for discretionary services under the 2003 Act.
- 7.4. In particular, the guidance contains useful advice on setting charges. It explains that for each discretionary service for which a charge is made, councils need to secure that, taking one year with another, the income from charges for that service does not exceed the costs

of provision. The requirement to take one year with another recognises the practical difficulties council will face in estimating the charges. It establishes the idea of balancing the books over a period of time (not less than 1 year and no more than 3 years). Any over or under recovery that results in a surplus or deficit of income in relation to costs in one period should be addressed by the council when setting its charges for future periods so that over time income equates to costs.

- 7.5. The 2003 Act also enables councils to trade in activities related to their functions on a commercial basis with a view to profit through a company.
- 7.6. Under the Local Authorities (Goods and Services) Act 1970 councils also have powers to enter into agreements with each other and a long list of designated bodies. These activities are not limited to cost recovery and a profit can be generated from these activities.
- 7.7. In terms of leisure and recreational facilities, section 19 of the Local Government (Miscellaneous Provisions) Act 1976 permits councils to charge for these beyond cost recovery limitations.

This page is intentionally left blank

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
CHILDREN AND YOUNG PEOPLE	EARLY HELP		
Children and Young People	Early Help	Childcare Nursery places (Willows Nursery) 0 to 2 Years 8am to 4pm	£288.00
Children and Young People	Early Help	Childcare Nursery places (Willows Nursery) 0 to 2 Years 9am to 3pm	£216.00
Children and Young People	Early Help	Childcare Nursery places (Willows Nursery) 0 to 2 Years 8am to 6pm	£360.00
Children and Young People	Early Help	Childcare Nursery places (Willows Nursery) 2 to 3 Years 8am to 4pm	£264.00
Children and Young People	Early Help	Childcare Nursery places (Willows Nursery) 2 to 3 Years 9am to 3pm	£198.00
Children and Young People	Early Help	Childcare Nursery places (Willows Nursery) 2 to 3 Years 8am to 6pm	£330.00
Children and Young People	Early Help	Childcare Nursery places (Willows Nursery) 3 to 4 Years 8am to 4pm	£240.00
Children and Young People	Early Help	Childcare Nursery places (Willows Nursery) 3 to 4 Years 9am to 3pm	£180.00
Children and Young People	Early Help	Childcare Nursery places (Willows Nursery) 3 to 4 Years 8am to 6pm	£300.00
Children and Young People	Early Help	Childcare Nursery places (Willows Nursery/Sunshine room) 3-4 Years 9AM to 3PM	£180.00
CHILDREN AND YOUNG PEOPLE	GORDON BROWN OEC		
Children and Young People	Gordon Brown OEC	Residential stays for Brent Schools	£247.13
Children and Young People	Gordon Brown OEC	Residential stays for non Brent Schools	£260.44
Children and Young People	Gordon Brown OEC	Non-residential day visit for non Brent Schools	£18.70
Children and Young People	Gordon Brown OEC	Non-residential day visit for Brent Schools	£18.70
Children and Young People	Gordon Brown OEC	Holiday Activities (Family Residential)	£77.00
Children and Young People	Gordon Brown OEC	Childrens Laser Party (per child)	£22.00
Children and Young People	Gordon Brown OEC	Weekend groups	£100.00
CHILDREN AND YOUNG PEOPLE	SCHOOL ATTENDANCE SERVICE		
Children and Young People	School Attendance Service	Early Bird Educaton Welfare Service (Attached Education Welfare Officer) - Maintained Infant, Junior, Primary, Special, PRU	£2,773.28
Children and Young People	School Attendance Service	Early Bird Educaton Welfare Service (Attached Education Welfare Officer) - Maintained Primary + Annexe	£2,851.31
Children and Young People	School Attendance Service	Early Bird Educaton Welfare Service (Attached Education Welfare Officer) - Maintained Secondary	£6,039.86
Children and Young People	School Attendance Service	Early Bird Educaton Welfare Service (Attached Education Welfare Officer) - Academy Primary, Academy Special, Free School Primary, Independent/Private Primary	£2,939.92
Children and Young People	School Attendance Service	Early Bird Educaton Welfare Service (Attached Education Welfare Officer) - Academy Primary + Annexe	£3,021.91
Children and Young People	School Attendance Service	Early Bird Educaton Welfare Service (Attached Education Welfare Officer) - Academy Secondary, Free School Secondary, Independent/Private Secondary, Colleges	£6,809.55
Children and Young People	School Attendance Service	Early Bird Educaton Welfare Service (Attached Education Welfare Officer) - Academy Primary & Secondary (All Through)	£7,940.29
Children and Young People	School Attendance Service	Late Payer Educaton Welfare Service (Attached Education Welfare Officer) - Maintained Infant, Junior, Primary, Special, PRU	£3,133.81
Children and Young People	School Attendance Service	Late Payer Educaton Welfare Service (Attached Education Welfare Officer) - Maintained Primary + Annexe	£3,221.98
Children and Young People	School Attendance Service	Late Payer Educaton Welfare Service (Attached Education Welfare Officer) - Maintained Secondary	£6,825.04
Children and Young People	School Attendance Service	Late Payer Educaton Welfare Service (Attached Education Welfare Officer) - Academy Primary, Academy Special, Free School Primary, Independent/Private Primary	£3,322.11
Children and Young People	School Attendance Service	Late Payer Educaton Welfare Service (Attached Education Welfare Officer) - Academy Primary + Annexe	£3,414.76
Children and Young People	School Attendance Service	Late Payer Educaton Welfare Service (Attached Education Welfare Officer) - Academy Secondary, Free School Secondary, Independent/Private Secondary, Colleges	£7,694.80

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
Children and Young People	School Attendance Service	Late Payer Educaton Welfare Service (Attached Education Welfare Officer) - Academy Primary & Secondary (All Through)	£8,972.53
CHILDREN AND YOUNG PEOPLE	SETTING AND SCHOOL EFFECTIVENESS SERVICE		
Children and Young People	Setting and School Effectiveness Service	Brent Music Service Instrumental/vocal tuition	£837.16
Children and Young People	Setting and School Effectiveness Service	Brent Music Service Large group tuition	£927.46
Children and Young People	Setting and School Effectiveness Service	Brent Music Service Music's Cool' where class teacher remains with BMS teacher	£1,960.80
Children and Young People	Setting and School Effectiveness Service	Brent Music Service Music's Cool' where BMS teacher provides PPA cover	£2,499.11
Children and Young People	Setting and School Effectiveness Service	Brent Music Service Wider Opportunities	£1,342.94
Children and Young People	Setting and School Effectiveness Service	Compliance and Governor Training Annual package. Maintained Brent Schools 1-50 Pupils	£1,525.00
Children and Young People	Setting and School Effectiveness Service	Compliance and Governor Training Annual package. Maintained Brent Schools 51-100 Pupils	£1,940.00
Children and Young People	Setting and School Effectiveness Service	Compliance and Governor Training Annual package. Maintained Brent Schools 101-200 Pupils	£2,295.00
Children and Young People	Setting and School Effectiveness Service	Compliance and Governor Training Annual package. Maintained Brent Schools 201-3000 Pupils	£2,775.00
Children and Young People	Setting and School Effectiveness Service	Compliance and Governor Training Annual package. Non Brent Schools 1-50 Pupils	£1,610.00
Children and Young People	Setting and School Effectiveness Service	Compliance and Governor Training Annual package. Non Brent Schools 51-100 Pupils	£2,135.00
Children and Young People	Setting and School Effectiveness Service	Compliance and Governor Training Annual package. Non Brent Schools 101-200 Pupils	£2,610.00
Children and Young People	Setting and School Effectiveness Service	Compliance and Governor Training Annual package. Non Brent Schools 201-3000 Pupils	£3,050.00
Children and Young People	Setting and School Effectiveness Service	Compliance and Governor Training Pay as you go rate Maintained Brent Schools (blended course rate) Half Day/Twilight	£130.00
Children and Young People	Setting and School Effectiveness Service	Compliance and Governor Training Pay as you go rate Maintained Brent Schools (blended course rate) 2 Session/Full Day Courses	£264.00
Children and Young People	Setting and School Effectiveness Service	Compliance and Governor Training Pay as you go rate Non Brent Schools (blended course rate) Half Day/Twilight	£141.00
Children and Young People	Setting and School Effectiveness Service	Compliance and Governor Training Pay as you go rate Non Brent Schools (blended course rate) 2 Session/Full Day Courses	£276.00
Children and Young People	Setting and School Effectiveness Service	Moderation of Teacher Assessment - One Form of Entry	£480.00
Children and Young People	Setting and School Effectiveness Service	Moderation of Teacher Assessment - Two Forms of entry	£600.00
Children and Young People	Setting and School Effectiveness Service	Moderation of Teacher Assessment - Three Forms of Entry	£720.00
Children and Young People	Setting and School Effectiveness Service	Moderation of Teacher Assessment - Four Forms of Entry	£840.00
Children and Young People	Setting and School Effectiveness Service	Moderation of Teacher Assessment - Five Forms of Entry	£960.00
Children and Young People	Setting and School Effectiveness Service	Compliance and Governor Training Pay as you go rate Maintained Brent Schools (blended course rate) 2 Full Day Courses	£340.00
Children and Young People	Setting and School Effectiveness Service	Compliance and Governor Training Pay as you go rate Maintained Brent Schools (blended course rate) 3 Full Day Courses	£420.00
Children and Young People	Setting and School Effectiveness Service	Compliance and Governor Training Pay as you go rate Academies/ Free Schools/ Independent Schools Brent Schools (blended course rate) 2 Full Day Courses	£375.00
Children and Young People	Setting and School Effectiveness Service	Compliance and Governor Training Pay as you go rate Academies/ Free Schools/ Independent Schools Brent School3 Full Day Courses	£460.00
Children and Young People	Setting and School Effectiveness Service	Phonics Screening Check 1 form entry	£96.00
Children and Young People	Setting and School Effectiveness Service	KS2 SATS Monitoirng visits	£96.00
CHILDREN AND YOUNG PEOPLE	SHORT BREAK CENTRE		

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
Children and Young People	Short Break Centre	Respite Care - Other LA (Weekday) 3pm - 9am 2:1 support day and 2:1 night	£1,798.02
Children and Young People	Short Break Centre	Respite Care - Other LA (Weekend - Friday, Saturday, School Holidays 24 hours, Sunday 3pm - 3pm) 2:1 support day and 2:1 night	£1,963.25
Children and Young People	Short Break Centre	Respite Care - Other LA (Weekday 3pm - 9am) 2:1 support day and 1:1 at night	£1,664.66
Children and Young People	Short Break Centre	Respite Care - Other LA (Weekend - Friday, Saturday, School Holidays 24 hours, Sunday 3pm - 3pm) 2:1 support day and 1:1 at night	£1,754.24
Children and Young People	Short Break Centre	Respite Care - Other LA (Weekday) 3pm - 9am 2:1 support at day time,	£1,477.01
Children and Young People	Short Break Centre	Respite Care - Other LA (Weekend - Friday, Saturday, School Holidays 24 hours, Sunday 3pm - 3pm) 2:1 support at day time, regular support at night time	£1,566.59
Children and Young People	Short Break Centre	Respite Care - Other LA (Weekday) 3pm - 9am 1:1 support day time as a standard requirement, regular support at night time.	£1,270.60
Children and Young People	Short Break Centre	Respite Care - Other LA (Weekend - Friday, Saturday, School Holidays 24 hours, Sunday 3pm - 3pm) 1:1 support as a standard requirement, regular support at night time.	£1,360.17
Children and Young People	Short Break Centre	2:1 support at day time	£1,963.25
Children and Young People	Short Break Centre	2:1 support at day time	£1,963.25
Children and Young People	Short Break Centre	2:1 support day and night	£1,963.25
NEIGHBOURHOODS & REGENERATION	BUILDING CONTROL		
Neighbourhoods & Regeneration	Building Control	Building Regulations Table A - Charges for the erection of one or more new dwelling units (<250m2) Full Plan charge ranging from 1 - 15 units	£2,342.82
Neighbourhoods & Regeneration	Building Control	Building Regulations Table A - Charges for the erection of > 15 units or units > 250m2) Full Plan & Inspection charge	£170.25
Neighbourhoods & Regeneration	Building Control	Building Regulations Table C (Domestic Alterations)	£279.34
Neighbourhoods & Regeneration	Building Control	Building Regulations Table D (Other Works)	£513.82
Neighbourhoods & Regeneration	Building Control	Demolition Notices	£558.68
Neighbourhoods & Regeneration	Building Control	Dangerous Structures	£334.40
Neighbourhoods & Regeneration	Building Control	Copy of Decision Notice (Post 2002)	£112.14
Neighbourhoods & Regeneration	Building Control	Copy of Section 25 PHA certificate/notice	£112.14
Neighbourhoods & Regeneration	Building Control	Existing Premises Name Change -Single house or premises per property	£279.34
Neighbourhoods & Regeneration	Building Control	Existing Premises Name Change –Multiple property involving more than one premises / address.	£279.34
Neighbourhoods & Regeneration	Building Control	Existing Premises - Street Name Change	£1,115.34
Neighbourhoods & Regeneration	Building Control	Existing Premises - Regularisation of previously unauthorised use of address / Retrospective application.	£1,674.02
Neighbourhoods & Regeneration	Building Control	Building Regulations Table B (Domestic Multi Storey Extension)	£1,227.48
Neighbourhoods & Regeneration	Building Control	Building Regulations Table B (Domestic Loft Conversions)	£914.50
Neighbourhoods & Regeneration	Building Control	Building Regulations Table B (Domestic Basement Extension)	£1,227.48
Neighbourhoods & Regeneration	Building Control	Building Regulations Table B (Domestic Single Storey Extension)	£959.36
Neighbourhoods & Regeneration	Building Control	Building Regulations Table B (Domestic Multi Storey Extension)	£1,227.48
Neighbourhoods & Regeneration	Building Control	Building Regulations Table B (Domestic Loft Conversions)	£914.50
Neighbourhoods & Regeneration	Building Control	Building Regulations Table B (Domestic Basement Extension)	£1,227.48
Neighbourhoods & Regeneration	Building Control	Conversion of Existing Building Into Self-Contained Flats/Dwelling Units - Single Unit	£936.92
Neighbourhoods & Regeneration	Building Control	Retrieval Of Microfiche Record	£37.72

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
Neighbourhoods & Regeneration	Building Control	Correspondence requiring technical research / review of casefile	£148.84
Neighbourhoods & Regeneration	Building Control	Complex queries requiring extensive research – individually assessed. Per Hour	£186.56
Neighbourhoods & Regeneration	Building Control	Completion Certificates Pre 2002 -£80.00 PLUS £20.00 Retrieval	£223.26
Neighbourhoods & Regeneration	Building Control	Completion Certificates Post 2002	£112.14
Neighbourhoods & Regeneration	Building Control	Copy of Decision Notice (Pre 2002)	£134.56
Neighbourhoods & Regeneration	Building Control	Copy of Decision Notice (Post 2002)	£112.14
Neighbourhoods & Regeneration	Building Control	Providing Copy of SNN Decision Notice + Agreed Plans (where available)	£186.56
Neighbourhoods & Regeneration	Building Control	Copy of AI Final Certificate per plot (where available)	£112.14
Neighbourhoods & Regeneration	Building Control	Confirmation regarding LA acceptance of CPS record	£93.78
Neighbourhoods & Regeneration	Building Control	Cancellation / Withdrawal Charge BEFORE validation	£186.56
Neighbourhoods & Regeneration	Building Control	Cancellation / Withdrawal Charge AFTER validation	£279.34
Neighbourhoods & Regeneration	Building Control	Cancellation / Withdrawal Charge AFTER Plans / Details or Calculations checked	Min £250 or 50% of building notice charge
Neighbourhoods & Regeneration	Building Control	Calculation of refund following request where charge exceeds expenditure – refer to Fee Regulations.	£186.56
Neighbourhoods & Regeneration	Building Control	Additional charge in respect of cancellation / non-payment / bounced cheque (refer to drawer)	£112.14
Neighbourhoods & Regeneration	Building Control	Cross Boundary working (including site inspections and Host Borough Administration Charge)	£112.14
Neighbourhoods & Regeneration	Building Control	Supplementary Charge per hour	£223.26
Neighbourhoods & Regeneration	Building Control	Resurrection Charge (or 50% whichever is greater)	£557.66
Neighbourhoods & Regeneration	Building Control	Dangerous structures - Surveying Costs (09:00 to 17:00) Mon-Fri	£223.26
Neighbourhoods & Regeneration	Building Control	Dangerous structures - Surveying Costs (17:00 to 09:00) Mon to Fri, Weekends and Bank Holidays (min 2 hours)	£279.34
Neighbourhoods & Regeneration	Building Control	Dangerous structures - Mileage	£1.32
Neighbourhoods & Regeneration	Building Control	Dangerous structures - Charge where excessive number of visits required to gain compliance	£372.12
Neighbourhoods & Regeneration	Building Control	Certify and Service of formal DS Notice	£558.68
Neighbourhoods & Regeneration	Building Control	Court Action (minimum fee)	£929.78
Neighbourhoods & Regeneration	Building Control	Removing Danger, shoring or hoarding in accordance with London Building Acts	15% of contractors net costs
Neighbourhoods & Regeneration	Building Control	Brent Administration costs in respect of contract, supervision of works, payments, etc.	15% of contractors net costs
Neighbourhoods & Regeneration	Building Control	SOL numbers confirmation of address for Land registry	£112.14
Neighbourhoods & Regeneration	Building Control	Existing Premises - Providing Copy of SNN Decision Notice + Agreed Plans (where available) charge per application.	£223.26
Neighbourhoods & Regeneration	Building Control	Street Naming & Numbering (New property 1-2 plots)	£368.04
Neighbourhoods & Regeneration	Building Control	Street Naming & Numbering (New property 3-5 plots)	£558.68
Neighbourhoods & Regeneration	Building Control	Street Naming & Numbering (New property 6-10 plots)	£747.30
Neighbourhoods & Regeneration	Building Control	Street Naming & Numbering (New property 11-20 plots)	£1,115.34
Neighbourhoods & Regeneration	Building Control	Street Naming & Numbering (New property 21-50 plots)	£1,674.02
Neighbourhoods & Regeneration	Building Control	Street Naming & Numbering (New property 51-100 plots)	£2,598.72
Neighbourhoods & Regeneration	Building Control	Street Naming & Numbering (New property 100+ plots plots)	£2,598.72
Neighbourhoods & Regeneration	Building Control	Street Naming & Numbering (New property additional charge where this includes naming a street)	£747.30

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
NEIGHBOURHOODS & REGENERATION	PLANNING		
Neighbourhoods & Regeneration	Planning	Pre-app 1 - Householder (extensions and alterations to a dwelling) (written response)	£156.75
Neighbourhoods & Regeneration	Planning	Pre-app 2 - Small Minor development (1 home / up to 99 sqm) (written response)	£360.52
Neighbourhoods & Regeneration	Planning	Pre-app 3 - Medium Minor development (2 to 4 homes/ 100 – 499 sqm) - written and meeting	£1,389.85
Neighbourhoods & Regeneration	Planning	Pre-app 4 - Large Minor development (5 to 9 homes / 500 – 999 sq.m.) - written and meeting	£2,455.75
Neighbourhoods & Regeneration	Planning	Pre-app 5 - Major development (10 to 24 homes / 1,000 - 1,999 sqm) - written and meeting	£6,008.75
Neighbourhoods & Regeneration	Planning	Pre-app 6 - Large major development (25 to 49 homes / 2,000 - 3,999 sqm) - written and meeting	£7,158.25
Neighbourhoods & Regeneration	Planning	Pre-app 7 - Medium major development (50 to 149 homes / 3,000 - 4999 sqm) - written and meeting	£9,823.00
Neighbourhoods & Regeneration	Planning	Pre-app 8 - Strategic development (150 units + / 5,000 sqm) - written and meeting	£12,540.00
Neighbourhoods & Regeneration	Planning	Pre-app 9 - Reserved matters (pursuant to an outline consent) - written and meeting	Half full price
Neighbourhoods & Regeneration	Planning	Meeting (Pre-app 1 to 2)	£156.75
Neighbourhoods & Regeneration	Planning	Revised submission from same applicant within 6 months of written feedback (Pre-app 2 to 8)	Half full price
Neighbourhoods & Regeneration	Planning	Multiple options for pre-application request (pre-app 2 to 8)	Half full price
Neighbourhoods & Regeneration	Planning	Issue related meeting - Major development (10+ homes, 1,000+ sqm)	£2,403.50
Neighbourhoods & Regeneration	Planning	Presentation to Planning Committee	£2,403.50
Neighbourhoods & Regeneration	Planning	Copies of planning decision notices	£31.35
Neighbourhoods & Regeneration	Planning	Copies of archived documents	£31.35
Neighbourhood & Regeneration	Planning	Advice on discharge of a planning condition (per condition)	£500.00
Neighbourhood & Regeneration	Planning	Pre-app advice on varying an existing planning permission	Half price full
Neighbourhood & Regeneration	Planning	Planning Performance Agreement Administration Fee (Mayor of London referral scheme)	£4,069.05
Neighbourhood & Regeneration	Planning	Planning Performance Agreement Administration Fee (non - referral Mayor of London referral schemes major of 50 or more homes/3000sqm or more)	£3,397.51
Neighbourhood & Regeneration	Planning	Planning Performance Agreement Administration Fee (under 50 homes or under 3000sqm)	£2,706.75
Neighbourhood & Regeneration	Planning	QRP/CRP Full Review Planning Fee	£1,988.94
Neighbourhood & Regeneration	Planning	QRP/CRP Chair review Planning Fee	£1,175.75
Neighbourhood & Regeneration	Planning	QRP/CRP Workshop Planning Fee	£1,066.98
Neighbourhood & Regeneration	Planning	Invalid fee - Alteration or extension to a dwelling, discharge of condition or non-material amendment	£129.15
Neighbourhood & Regeneration	Planning	Invalid fee - minor application	£153.07
Neighbourhood & Regeneration	Planning	Invalid fee - major (non-referrable)	£342.31
Neighbourhood & Regeneration	Planning	Invalid fee - major (referrable)	£603.62
Neighbourhood & Regeneration	Planning	Telecommunication Mast and equipment Pre-app (same as PRE-APP 2)	£353.62
Neighbourhoods & Regeneration	Planning	High Hedges Application	£600.00
Neighbourhoods & Regeneration	Planning	Pre-Application Listed Building Consent not associated with a planning application written advice	£180.00
Neighbourhoods & Regeneration	Planning	Pre-Application Listed Building Consent not associated with a planning application written advice+phone or meeting	£225.00
Neighbourhoods & Regeneration	Planning	Pre-Application Listed Building Consent not associated with a planning application written advice + site visit	£270.00
Neighbourhoods & Regeneration	Planning	Pre-Application TPO or Conservation Area tree works not associated with a planning application written advice	£95.00

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
Neighbourhoods & Regeneration	Planning	Pre-Application TPO or Conservation Area tree works not associated with a planning application written advice+phone or meeting	£155.00
Neighbourhoods & Regeneration	Planning	Pre-Application TPO or Conservation Area tree works not associated with a planning application written advice + site visit	£185.00
Neighbourhoods & Regeneration	Planning	Confirmation of compliance with clauses in a S106	£575.00
Neighbourhoods & Regeneration	Planning	S106 Planning Negotiation Fee - Simple (1-3 obligations)	£1,051.10
Neighbourhoods & Regeneration	Planning	S106 Planning Negotiation Fee - Moderate (4-7 obligations)	£1,787.20
Neighbourhoods & Regeneration	Planning	S106 Planning Negotiation Fee - Complex (8+ obligations / review mechanisms)	£2,456.00
Neighbourhoods & Regeneration	Planning	S106 Planning Negotiation Fee - Simple Deed of Variation	£523.00
Neighbourhoods & Regeneration	Planning	S106 Monitoring Fee - General - Non-financial contribution (Per each HoT) that's not specific under 10 units or under 1,000 sqm	£596.10
Neighbourhoods & Regeneration	Planning	S106 Monitoring Fee - General - Non-financial contribution (Per each HoT) that's not specific between 10-100 units or between 1,000- 10,000 sqm	£896.70
Neighbourhoods & Regeneration	Planning	S106 Monitoring Fee - General - Non-financial contribution (Per each HoT) that's not specific between in excess of 100 units or in excess of 10,000 sqm	£1,187.20
Neighbourhoods & Regeneration	Planning	S106 Monitoring Fee - General - Standard Simple Obligation	5% of the total financial contribution amount up to £100,000
Neighbourhoods & Regeneration	Planning	S106 Monitoring Fee - General - Standard Moderate Obligation	3% of the total financial contribution amount on the remainder of the contributions between £100,000 and £1 million
Neighbourhoods & Regeneration	Planning	S106 Monitoring Fee - General - Standard Complex Obligation	1% of the total financial contribution amount on the remainder of the contributions over £1 million. Total fees on financial contributions capped at £100,000 per development
Neighbourhoods & Regeneration	Planning	S106 Monitoring Fee - Specific - Viability Review	£1,569.30
Neighbourhoods & Regeneration	Planning	S106 Monitoring Fee - Specific - Sustainability	£1,049.60
Neighbourhoods & Regeneration	Planning	S106 Monitoring Fee - Specific - Energy	£1,049.60
Neighbourhoods & Regeneration	Planning	S106 Monitoring Fee - Specific - Sustainability and Energy	£2,099.20
Neighbourhoods & Regeneration	Planning	S106 Monitoring Fee - Specific - Travel Plan	£2,236.80
Neighbourhoods & Regeneration	Planning	S106 Monitoring Fee - Specific - Car Club (Off Site)	£1,049.60
Neighbourhoods & Regeneration	Planning	S106 Monitoring Fee - Specific - Training and Employment	£1,049.60
NEIGHBOURHOODS & REGENERATION	PLANNING ENFORCEMENT		
Neighbourhoods & Regeneration	Planning Enforcement	Checking Compliance with use Enforcement Notices	£578.00
Neighbourhoods & Regeneration	Planning Enforcement	Checking Compliance with development Enforcement Notices	£258.00
NEIGHBOURHOODS & REGENERATION	TRAFFIC PLANNING/ SCHEME DESIGN		
Neighbourhoods & Regeneration	Traffic Planning/ Scheme Design	Highways Searches	£91.70

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
Neighbourhoods & Regeneration	Traffic Planning/ Scheme Design	S38/S278 approval and supervision fees	9% cost of the proposed works with a £2,500 minimum fee
Neighbourhoods & Regeneration	Traffic Planning/ Scheme Design	Highway Licences for building oversailing and private utilities in the highway	£2,612.50
Neighbourhoods & Regeneration	Traffic Planning/ Scheme Design	Traffic Orders	£4,493.50
Neighbourhoods & Regeneration	Traffic Planning/ Scheme Design	Diversion of footpaths approvals	£6,061.00
Neighbourhoods & Regeneration	Traffic Planning/ Scheme Design	Stopping Up Orders	£10,450.00
NEIGHBOURHOODS & REGENERATION	BRENT START		
Neighbourhoods & Regeneration	Brent Start	Learning and skills - Accredited courses	£4.20
Neighbourhoods & Regeneration	Brent Start	Learning and Skills - Personal and community development learning	£5.83
Neighbourhoods & Regeneration	Brent Start	Learning and Skills - Personal and community development learning - concessions (A)	£2.91
Neighbourhoods & Regeneration	Brent Start	Learning and Skills - Personal and community development learning - concessions (B)	£1.46
Neighbourhoods & Regeneration	Brent Start	Learning and Skills - targeted community development courses	£4.20
Neighbourhoods & Regeneration	Brent Start	Learning and Skills - targeted community development courses - concessions (A)	£2.13
Neighbourhoods & Regeneration	Brent Start	Room hire	£44.81
NEIGHBOURHOODS & REGENERATION	LAND CHARGES		
Neighbourhoods & Regeneration	Land charges	Full Official Search (LLC1 and CON29 2016)	£334.40
Neighbourhoods & Regeneration	Land charges	Full Official Search and each additional Parcel	£67.92
Neighbourhoods & Regeneration	Land charges	LLC1	£96.14
Neighbourhoods & Regeneration	Land charges	LLC1 Additional Parcel	£31.35
Neighbourhoods & Regeneration	Land charges	CON 29 - 2016	£240.35
Neighbourhoods & Regeneration	Land charges	Con 29 - 2016 each additional Parcel	£36.57
Neighbourhoods & Regeneration	Land charges	CON 290 requested each question submitted with LLC1 and CON 29 - 2016 forms	£36.57
Neighbourhoods & Regeneration	Land charges	CON 29 O each question requested separately	£48.07
Neighbourhoods & Regeneration	Land charges	Copy Search of replies	£48.07
Neighbourhoods & Regeneration	Land charges	CON29 O requested separately for each additional parcel	£36.57
Neighbourhoods & Regeneration	Land charges - EIR	CON29 2016 Individual first question	£31.35
Neighbourhoods & Regeneration	Land charges - EIR	CON29 2016 Individual each additional question	£3.66
Neighbourhoods & Regeneration	Land charges - EIR	CON29 2016 Individual All questions listed on our website under Environmental Informational Regulations details 'Local Land Charges	£120.17
Neighbourhoods & Regeneration	Land charges - EIR	CON29 2016 Individual each additional parcel	£7.31
Neighbourhoods & Regeneration	Land charges - EIR	Copy of replies CON29 2016 individual replies	£20.90
PARTNERSHIPS HOUSING & RESIDENTS SERVICES	COMMUNICATIONS		
Partnerships Housing & Residents Services	Communications	Film Licence	£100.00
Partnerships Housing & Residents Services	Communications	Location Fees (high) per day	£5,000.00
Partnerships Housing & Residents Services	Communications	Location Fees per day (Medium)	£3,000.00

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
Partnerships Housing & Residents Services	Communications	Location Fees per day (low)	£2,000.00
Partnerships Housing & Residents Services	Communications	Parking Fees (per parking bay suspension)	£60.00
Partnerships Housing & Residents Services	Communications	Full Page Advertising in Your Brent Magazine	£1,770.00
Partnerships Housing & Residents Services	Communications	Half Page Advertising in Your Brent Magazine	£973.00
Partnerships Housing & Residents Services	Communications	Quarter Page Advertising in Your Brent Magazine	£643.00
Partnerships Housing & Residents Services	Communications	Eighth Page Advertising in Your Brent Magazine	£275.00
Partnerships Housing & Residents Services	Communications	Late Notice Admin Fee	£160.00
Partnerships Housing & Residents Services	Communications	Additional/Film Officer time fee/site visits/ per hour	£75.00
Partnerships Housing & Residents Services	Communications	Film Officer out of hours fee weekdays (between 9pm-7am) and all weekend per hour	£160.00
Partnerships Housing & Residents Services	Communications	No Notice of Objection (subject to online payment system going ahead)	£70.00
Partnerships Housing & Residents Services	Communications	Parks A Filming (large crew): Roundwood Gladstone Barham Park Fryent Country Welsh Harp	£3,500.00
Partnerships Housing & Residents Services	Communications	Parks A Filming (medium crew): Roundwood Gladstone Barham Park Fryent Country Welsh Harp	£3,000.00
Partnerships Housing & Residents Services	Communications	Parks A Filming (small crew): Roundwood Gladstone Barham Park Fryent Country Welsh Harp	£2,000.00
Partnerships Housing & Residents Services	Communications	Parks B Filming (large crew) All other park and recreation grounds	£3,500.00
Partnerships Housing & Residents Services	Communications	Parks B Filming (medium crew) All other park and recreation grounds	£3,000.00
Partnerships Housing & Residents Services	Communications	Parks B Filming (small crew) All other park and recreation grounds	£2,000.00
Partnerships Housing & Residents Services	Communications	Parks Unit base	£900.00
Partnerships Housing & Residents Services	Communications	Brent Civic Centre	£7,500.00
Partnerships Housing & Residents Services	Communications	Cemeteries / Libraries / Sports Centres (large crew)	£3,500.00
Partnerships Housing & Residents Services	Communications	Cemeteries / Libraries / Sports Centres (medium crew)	£3,000.00
Partnerships Housing & Residents Services	Communications	Cemeteries / Libraries / Sports Centres (small crew)	£2,000.00
Partnerships Housing & Residents Services	Communications	Willesden Sports Centre (large crew)	£3,500.00
Partnerships Housing & Residents Services	Communications	Willesden Sports Centre (medium crew)	£3,000.00
Partnerships Housing & Residents Services	Communications	Willesden Sports Centre (small crew)	£2,500.00
Partnerships Housing & Residents Services	Communications	Housing Estates (large crew)	£3,500.00
Partnerships Housing & Residents Services	Communications	Housing Estates (medium crew)	£3,000.00
Partnerships Housing & Residents Services	Communications	Housing Estates (small crew)	£2,000.00
Partnerships Housing & Residents Services	Communications	Drone admin fee per application	£250.00
PARTNERSHIPS HOUSING & RESIDENTS SERVICES	CONFERENCE AND EVENTS		

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
Partnerships Housing & Residents Services	Conference and Events	The Grand Hall 10 hours hire package (Monday to Sunday)	£7,139.00
Partnerships Housing & Residents Services	Conference and Events	The Grand Hall 12 hours hire package (Saturday and Sunday only)	£9,801.00
Partnerships Housing & Residents Services	Conference and Events	The Grand Hall additional set up or de-rig hire (per hour)	£363.00
Partnerships Housing & Residents Services	Conference and Events	The Grand Hall bank holiday surcharge fee	£1,246.30
Partnerships Housing & Residents Services	Conference and Events	The Grand Hall (per hour, min 6 hours required)	£726.00
Partnerships Housing & Residents Services	Conference and Events	Conference Hall (per hour, min 5 hours required)	£314.60
Partnerships Housing & Residents Services	Conference and Events	The Bridge (available only with the Grand Hall)	£605.00
Partnerships Housing & Residents Services	Conference and Events	One Board Room (per hour)	£49.50
Partnerships Housing & Residents Services	Conference and Events	Two Board Rooms together (per hour)	£99.00
Partnerships Housing & Residents Services	Conference and Events	Three Board Rooms together (per hour)	£148.50
Partnerships Housing & Residents Services	Conference and Events	Four Board Rooms together (per hour)	£198.00
Partnerships Housing & Residents Services	Conference and Events	Foyer stall hire (8 hours)	£187.00
Partnerships Housing & Residents Services	Conference and Events	Day Delegate Rate (with sandwich lunch and 3 servings of tea and coffee) per person, min numbers apply	£85.00
Partnerships Housing & Residents Services	Conference and Events	Day Delegate Rate (with finger buffet lunch and 3 servings of tea and coffee) per person, min numbers apply	£85.00
Partnerships Housing & Residents Services	Conference and Events	Charitable discount. A discount of 20% - 50% on Conference Hall and Board Rooms hire are available for charitable purpose events that are closely aligned to the Council's Borough Plan and will benefit the borough and its local residents.	25% - 50%
Partnerships Housing & Residents Services	Conference and Events	Discretionary discount on Conference Hall and Board Rooms hire - during quite time to attract bookings	10% - 20%
LAW & GOVERNANCE	LEGAL SERVICES		
Law & Governance	Legal Services	Third Party Charges for Legal Work - Housing Management - Residential Conveyancing. Loft cellers garden	£1,950.00
Law & Governance	Legal Services	Third Party Charges for Legal Work - Housing Management - Residential Conveyancing. Deed of rectification	£825.00
Law & Governance	Legal Services	Third Party Charges for Legal Work - Housing Management - Residential Conveyancing. License for Alteration	£1,190.00
Law & Governance	Legal Services	Third Party Charges for Legal Work - S106 Agreements.	£2,700.00
Law & Governance	Legal Services	Third Party Charges for Legal Work - Section 38 and Section 278 Agreements.	£4,165.00
Law & Governance	Legal Services	Third Party Charges for Legal Work - Commercial Property Transactions, Lease	£945.00
Law & Governance	Legal Services	Third Party Charges for Legal Work - Commercial Property Transactions. Licence to Assign	£1,025.00
Law & Governance	Legal Services	Third Party Charges for Legal Work - Commercial Property Transactions. Licence for alteration	£1,025.00
Law & Governance	Legal Services	Third Party Charges for Legal Work - Commercial Property Transactions. Licence to underlet	£1,025.00
Law & Governance	Legal Services	Third Party Charges for Legal Work - Commercial Property Transactions. Collaboration Agreement	£2,250.00
Law & Governance	Legal Services	Third Party Charges for Legal Work - Commercial Property Transactions. Development Agreement subject to Lease	£4,700.00
Law & Governance	Legal Services	Third Party Charges for Legal Work - Commercial Property Transactions. S123 LGA Notice	£470.00
Law & Governance	Legal Services	Third Party Charges for Legal Work - Housing Management - Residential Conveyancing. Single Lease extension for enfranchisement of a single house	£2,010.00
Law & Governance	Legal Services	Third Party Charges for Legal Work - Commercial Property Transactions, Lease	£950.00
Law & Governance	Legal Services	Third Party Charges for Legal Work - Commercial Property Transactions, Lease	£1,415.00
Law & Governance	Legal Services	Third Party Charges for Legal Work - Housing Management - Residential Conveyancing. Collective Enfranchisement	£2,030.00
Law & Governance	Legal Services	S106 Legal Admin fee	£2,315.00
Law & Governance	Legal Services	S106 Legal Fee (per hour)	£305.00
Law & Governance	Legal Services	Third Party Charges for Legal Work - Commercial Property Transactions, Deed of Variation	£1,000.00

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
Law & Governance	Legal Services	Third Party Charges for Legal Work - Commercial Property Transactions Agreements for Lease	£3,500.00
Law & Governance	Legal Services	Third Party Charges for Legal Work - Commercial Property Transactions. Development Agreements	£60,000.00
PARTNERSHIPS HOUSING & RESIDENTS SERVICES	PRIVATE HOUSING SERVICES		
Partnerships Housing & Residents Services	Private Housing Services	Houses in Multiple Occupation Mandatory licences	£840.00
Partnerships Housing & Residents Services	Private Housing Services	Houses in Multiple Occupation Additional licences	£840.00
Partnerships Housing & Residents Services	Private Housing Services	Other Houses Selective licences	£640.00
Partnerships Housing & Residents Services	Private Housing Services	Admin charge for Work in Default	30% of cost of works or minimum of £150
Partnerships Housing & Residents Services	Private Housing Services	Notices	£330.00
Partnerships Housing & Residents Services	Private Housing Services	Specifications for Empty Property Grant	£550.00
Partnerships Housing & Residents Services	Private Housing Services	DFG and SWG Agency Service	16.5% of cost of works or minimum of £66
PARTNERSHIPS HOUSING & RESIDENTS SERVICES	LIBRARIES		
Partnerships Housing & Residents Services	Libraries	Audio Visual loans	£1.00
Partnerships Housing & Residents Services	Libraries	Printing and photocopying charges	£0.30
Partnerships Housing & Residents Services	Harlesden Library	Carolyn Downs' Room - per hour commercial hire charges	£42.00
Partnerships Housing & Residents Services	Harlesden Library	Carolyn Downs' Room - per hour concessionary hire charges	£32.00
Partnerships Housing & Residents Services	The Library at Willesden Green	Education Room - per hour commercial hire charges	£42.00
Partnerships Housing & Residents Services	The Library at Willesden Green	Performance Space- per hour commercial hire charges	£66.00
Partnerships Housing & Residents Services	The Library at Willesden Green	Reading Room- per hour commercial hire charges	£42.00
Partnerships Housing & Residents Services	The Library at Willesden Green	Education Room - per hour concessionary hire charges	£32.00
Partnerships Housing & Residents Services	The Library at Willesden Green	Reading Room- per hour concessionary hire charges	£32.00
Partnerships Housing and Resident Services	Wembley Library	Room 7 - per hour commercial hire charges	£42.00
Partnerships Housing and Resident Services	Wembley Library	Room 7 - per hour concessionary hire charges	£32.00
PARTNERSHIPS HOUSING & RESIDENTS SERVICES	MUSEUM & ARCHIVES		
Partnerships Housing & Residents Services	Museum & Archives	Printing and photocopying charges: Black & White A4	£0.25
Partnerships Housing & Residents Services	Museum & Archives	Printing and photocopying charges: Black & White A3	£0.50
Partnerships Housing & Residents Services	Museum & Archives	Printing and photocopying charges: Colour A4	£0.95
Partnerships Housing & Residents Services	Museum & Archives	Printing and photocopying charges: Colour A3	£1.90
Partnerships Housing & Residents Services	Museum & Archives	Scanning (per document)	£4.00
Partnerships Housing & Residents Services	Museum & Archives	Charge to purchase USB and upload images	£7.50
Partnerships Housing & Residents Services	Museum & Archives	Use of personal camera	£9.50
Partnerships Housing & Residents Services	Museum & Archives	Digital Copies (per image): Non-Commercial Use	£8.00
Partnerships Housing & Residents Services	Museum & Archives	Digital Copies (per image): Commercial Use	£48.00

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
Partnerships Housing & Residents Services	Museum & Archives	Research Service (charge per hour for max of 2 hours)	£32.00
Partnerships Housing and Resident Services	Museum & Archives	Bespoke archive workshops	£200.00
Partnerships Housing and Resident Services	Museum & Archives	Personal use - non-commercial	£10.50
Partnerships Housing and Resident Services	Museum & Archives	Publication - front cover	£80.00
Partnerships Housing and Resident Services	Museum & Archives	Publication - interior	£58.00
Partnerships Housing and Resident Services	Museum & Archives	Leaflets and brochures (Digital image reproductions)	£58.00
Partnerships Housing and Resident Services	Museum & Archives	Presentations and internal reports (Digital image reproductions)	£58.00
Partnerships Housing and Resident Services	Museum & Archives	Advertising in newspapers and periodicals (Digital image reproductions)	£58.00
Partnerships Housing and Resident Services	Museum & Archives	Temporary Exhibitions (up to A1) (Digital image reproductions)	£58.00
Partnerships Housing and Resident Services	Museum & Archives	Temporary Exhibitions (A1-A0) (Digital image reproductions)	£80.00
Partnerships Housing and Resident Services	Museum & Archives	Interior decoration of commercial premises (Price applies to use in one location - use in more than one location subject to discount) :	Please contact us for a quote
Partnerships Housing and Resident Services	Museum & Archives	Up to A3 (Digital image reproductions)	£58.00
Partnerships Housing and Resident Services	Museum & Archives	A2 (Digital image reproductions)	£110.00
Partnerships Housing and Resident Services	Museum & Archives	A1 (Digital image reproductions)	£200.00
Partnerships Housing and Resident Services	Museum & Archives	A0 (Digital image reproductions)	£360.00
Partnerships Housing and Resident Services	Museum & Archives	Larger than A0 (Digital image reproductions)	Please contact us for a quote
Partnerships Housing and Resident Services	Museum & Archives	TV - 5 year unlimited transmission (excluding video and DVD) (Digital image reproductions)	£360.00
Partnerships Housing and Resident Services	Museum & Archives	Videos, DVDs and Films (Digital image reproductions)	£150.00
Partnerships Housing and Resident Services	Museum & Archives	Web use (Digital image reproductions)	£55.00
Partnerships Housing and Resident Services	Museum & Archives	Supply of Images of a CD (Digital image reproductions)	£8.00
COMMUNITY HEALTH & WELLBEING	SPORTS LEISURE CENTRE		
Community Health & Wellbeing	Sports leisure centres	B.Active card (Resident standard card)	£44.25
Community Health & Wellbeing	Sports leisure centres	B.Active card (Non resident standard card)	£76.00
Community Health & Wellbeing	Sports leisure centres	B.Active card (60+ or disabled resident Concession)	£7.10
Community Health & Wellbeing	Sports leisure centres	B.Active card (Resident Concession - 6 months)	£3.70
COMMUNITY HEALTH & WELLBEING	CULTURE, SPORTS AND RECREATION		

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
Community Health & Wellbeing	Culture, Sports and Recreation	Sports Hall Hire - Peak	£65.00
Community Health & Wellbeing	Culture, Sports and Recreation	Sports Hall Hire - Juniors Peak	£45.00
Community Health & Wellbeing	Culture, Sports and Recreation	Sports Hall Hire - Off Peak	£39.50
Community Health & Wellbeing	Culture, Sports and Recreation	Sports Hall Hire - Juniors Off Peak	£30.00
Community Health & Wellbeing	Culture, Sports and Recreation	Dance Studio Peak	£40.00
Community Health & Wellbeing	Culture, Sports and Recreation	Dance Studio - Off Peak	£25.00
Community Health & Wellbeing	Culture, Sports and Recreation	Badminton Court Peak	£13.00
Community Health & Wellbeing	Culture, Sports and Recreation	Badminton Court - Off Peak	£8.50
Community Health & Wellbeing	Culture, Sports and Recreation	Table Tennis Peak	£8.00
Community Health & Wellbeing	Culture, Sports and Recreation	Table Tennis - Off Peak	£6.00
Community Health & Wellbeing	Culture, Sports and Recreation	Gym Membership	£27.50
Community Health & Wellbeing	Culture, Sports and Recreation	Gym Membership - Joint	£45.00
Community Health & Wellbeing	Culture, Sports and Recreation	Gym Membership - Annual	£275.00
Community Health & Wellbeing	Culture, Sports and Recreation	Gym Membership - concessions	£22.50
Community Health & Wellbeing	Culture, Sports and Recreation	Gym Membership - off peak use	£20.00
Community Health & Wellbeing	Culture, Sports and Recreation	Gym Membership - corporate	£25.00
Community Health & Wellbeing	Culture, Sports and Recreation	Gym Membership - Junior	£16.00
Community Health & Wellbeing	Culture, Sports and Recreation	Gym Induction - Adults	£12.50
Community Health & Wellbeing	Culture, Sports and Recreation	Gym Induction - Youth 14-16	£8.00
Community Health & Wellbeing	Culture, Sports and Recreation	Gym casual use - Adults Peak	£7.50
Community Health & Wellbeing	Culture, Sports and Recreation	Gym casual use - Adults Off Peak	£5.00
Community Health & Wellbeing	Culture, Sports and Recreation	Gym casual use - Youth 14-16	£4.00
Community Health & Wellbeing	Culture, Sports and Recreation	Sauna and Steam - Peak	£7.50
Community Health & Wellbeing	Culture, Sports and Recreation	Sauna and Steam - Off Peak	£5.50
Community Health & Wellbeing	Culture, Sports and Recreation	Parties	£125.00
Community Health & Wellbeing	Culture, Sports and Recreation	Junior Classes /session	£4.00
Community Health & Wellbeing	Culture, Sports and Recreation	Boardroom - Full Day	£125.00
Community Health & Wellbeing	Culture, Sports and Recreation	Community Suite - Full Day	£175.00
Community Health & Wellbeing	Culture, Sports and Recreation	Tropics Suite - Full Day	£200.00
Community Health & Wellbeing	Culture, Sports and Recreation	Syndicate Room - Full Day	£175.00
Community Health & Wellbeing	Culture, Sports and Recreation	Conference Room - Full Day	£275.00
Community Health & Wellbeing	Culture, Sports and Recreation	Function Hall - Full Day	£395.00
Community Health & Wellbeing	Culture, Sports and Recreation	Boardroom - Per Hour	£17.50
Community Health & Wellbeing	Culture, Sports and Recreation	Community Suite - Per Hour	£32.50
Community Health & Wellbeing	Culture, Sports and Recreation	Tropics Suite - Per Hour	£42.00
Community Health & Wellbeing	Culture, Sports and Recreation	Syndicate Room - Per Hour	£40.00
Community Health & Wellbeing	Culture, Sports and Recreation	Conference Room - Per Hour	£70.00

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
Community Health & Wellbeing	Culture, Sports and Recreation	Function Hall - Per Hour	£55.00
Community Health & Wellbeing	Culture, Sports and Recreation	Room Hire Kitchen	£375.00
Community Health & Wellbeing	Culture, Sports and Recreation	Room Hire Servery	£275.00
NEIGHBOURHOODS & REGENERATION	PEST CONTROL		
Neighbourhoods & Regeneration	Pest Control	Pest - Bedbugs (2 visits)	£251.67
Neighbourhoods & Regeneration	Pest Control	Pest - Bedbugs 5-8 bedrooms (2 visits)	£287.50
Neighbourhoods & Regeneration	Pest Control	Pest - Cockroaches (1 visit)	£173.33
Neighbourhoods & Regeneration	Pest Control	Pest - Fleas (2 visits)	£233.33
Neighbourhoods & Regeneration	Pest Control	Pest - Mice (3 visits)	£156.67
Neighbourhoods & Regeneration	Pest Control	Pest - Rats (3 visits)	£156.67
Neighbourhoods & Regeneration	Pest Control	Pest - Wasps (1 visit)	£71.67
Neighbourhoods & Regeneration	Pest Control	Pest treatment, Pharaoh Ants	£230.83
Neighbourhoods & Regeneration	Pest Control	Pest treatment, Squirrels	£250.00
Neighbourhoods & Regeneration	Pest Control	Pest treatment - appointment missed/treatment not carried out	£50.00
Neighbourhoods & Regeneration	Pest Control	Admin fee for offline bookings	£21.67
Neighbourhoods & Regeneration	Pest Control	Pest - Clothes Moths up to 3 bedrooms (2 visits booked online)	£252.50
Neighbourhoods & Regeneration	Pest Control	Pest - Clothes Moths 4 - 6 bedrooms (2 visits booked online)	£287.50
Neighbourhoods & Regeneration	Pest Control	Pest - Combined rodents and cockroaches (3 visits booked online)	£260.00
Neighbourhoods & Regeneration	Pest Control	Any Pest treatment at a house with multiple tenants - Houses in multiple occupation (HMO)	Price on Application
Neighbourhoods & Regeneration	Pest Control	Pest - Bedbugs (4 visits, heavy infestation 1-3 bedrooms)	£416.97
Neighbourhoods & Regeneration	Pest Control	Pest - Bedbugs (4 visits, light infestation 4+ bedrooms)	£500.00
Neighbourhoods & Regeneration	Pest Control	Pest - Garden Ants (1 visit booked online)	£92.50
Neighbourhoods & Regeneration	Pest Control	Pest - Bird Control	105-155 p/h
Neighbourhoods & Regeneration	Pest Control	Technician Charges per hour	65-85 p/h
Neighbourhoods & Regeneration	Pest Control	Treatment outside of London Borough of Brent	Discretionary Charge to Cover Additional Costs
Neighbourhood & Regeneration	Pest Control	Insect Sample Tube Postal Examination	£40.00
Neighbourhood & Regeneration	Pest Control	Residential Survey for Pest Examination	£62.50
Neighbourhood & Regeneration	Pest Control	Pest - Combined Rat and Mice (3 Visits)	£229.17
Neighbourhood & Regeneration	Pest Control	Pest - Combined Rodents and Bedbugs (3 Visits)	£332.50
NEIGHBOURHOODS & REGENERATION	ANIMAL WELFARE	ANIMAL WELFARE	
Neighbourhoods & Regeneration	Animal Welfare	Collection and Return of stray dog	£70-200
Neighbourhoods & Regeneration	Animal Welfare	Kennelling Fees per dog per night	£25.00
Neighbourhoods & Regeneration	Animal Welfare	Vets Fees for Stray Dogs	Recharge at Cost
Neighbourhoods & Regeneration	Animal Welfare	Transport of Dog Per Journey	£50.00

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
NEIGHBOURHOODS & REGENERATION	SAFETY AT SPORTS GROUNDS		
Neighbourhoods & Regeneration	Safety at Sports Grounds	Stadium Safety Certification (General/New Style) (Per hour)	£120.00
Neighbourhoods & Regeneration	Safety at Sports Grounds	Stadium Safety Certification (Special) (Per hour)	£120.00
Neighbourhoods & Regeneration	Safety at Sports Grounds	Revision of Safety Certificate (Per hour)	£120.00
NEIGHBOURHOODS & REGENERATION	HEALTHY STREETS AND PARKING		
Neighbourhoods & Regeneration	Healthy Streets and Parking	Permanent Orders	£4,558.00
Neighbourhoods & Regeneration	Healthy Streets and Parking	Stopping Up Orders	£6,148.00
NEIGHBOURHOODS & REGENERATION	HIGHWAYS MANAGEMENT		
Neighbourhoods & Regeneration	Highways Management	Section 50 Licence Application, varies on depth	£495.00
Neighbourhoods & Regeneration	Highways Management	NRSWA CAT 1+2 Roads - DfT Maximum £105	£105.00
Neighbourhoods & Regeneration	Highways Management	NRSWA CAT 1+2 Roads - DfT Maximum £240	£223.00
Neighbourhoods & Regeneration	Highways Management	NRSWA CAT 1+2 Roads - DfT Maximum £130	£130.00
Neighbourhoods & Regeneration	Highways Management	NRSWA CAT 1+2 Roads - DfT Maximum £65	£65.00
Neighbourhoods & Regeneration	Highways Management	NRSWA CAT 1+2 Roads - DfT Maximum £60	£60.00
Neighbourhoods & Regeneration	Highways Management	NRSWA CAT 3+4 Roads - DfT Maximum £75	£75.00
Neighbourhoods & Regeneration	Highways Management	NRSWA CAT 3+4 Roads - DfT Maximum £150	£150.00
Neighbourhoods & Regeneration	Highways Management	NRSWA CAT 3+4 Roads - DfT Maximum £45	£45.00
Neighbourhoods & Regeneration	Highways Management	NRSWA CAT 3+4 Roads - DfT Maximum £40	£40.00
Neighbourhoods & Regeneration	Highways Management	NRSWA Section 72 Inspection of defective reinstatement	£48.00
Neighbourhoods & Regeneration	Highways Management	NRSWA Section 72 Defective reinstatement reported	£68.00
Neighbourhoods & Regeneration	Highways Management	NRSWA Section 74 charges	varies £100 - £2,500 per day
Neighbourhoods & Regeneration	Highways Management	NRSWA Major offence (discount for early pay)	£500.00
Neighbourhoods & Regeneration	Highways Management	NRSWA Minor offence (discounted for early pay)	£120.00
Neighbourhoods & Regeneration	Highways Management	Non-refundable admin charge Domestic Vehicle Crossing	£128.24
Neighbourhoods & Regeneration	Highways Management	non-refundable admin charge Industrial Vehicle Crossover	£128.24
Neighbourhoods & Regeneration	Highways Management	Crossings - White Line Access Bar <6m fixed £	£81.60
Neighbourhoods & Regeneration	Highways Management	Crossings -White Line Access Bar 6-10m	£136.68
Neighbourhoods & Regeneration	Highways Management	Crossings - White Line Access Bar >10m	Price on Application
Neighbourhoods & Regeneration	Highways Management	Crossings - Markup on Constructing a crossing	Price on Application
Neighbourhoods & Regeneration	Highways Management	TM, cost of officer resource at events	£4,239.95
Neighbourhoods & Regeneration	Highways Management	Temporary Traffic Management Order	£2,953.60
Neighbourhoods & Regeneration	Highways Management	Emergency Traffic Management. Order s14(2)	£1,511.40
Neighbourhoods & Regeneration	Highways Management	Provision of advice on drainage to developers prior to planning application Category A (large scale developments) - initial meeting	£5,021.60
Neighbourhoods & Regeneration	Highways Management	Provision of advice on drainage to developers prior to planning application Category A (large scale developments) - follow-up meeting	£1,434.71

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
Neighbourhoods & Regeneration	Highways Management	Provision of advice on drainage to developers prior to planning application Category B (other developments) - initial meeting	£3,189.54
Neighbourhoods & Regeneration	Highways Management	Provision of advice on drainage to developers prior to planning application Category B (other developments) - follow-up meeting	£1,028.18
NEIGHBOURHOODS & REGENERATION	PARKS (RECREATION)		
Neighbourhoods & Regeneration	Parks (Recreation)	Hire of pavilion per hour	£68.30
Neighbourhoods & Regeneration	Parks (Recreation)	Hire of pavilion per hour after 8pm in Winter, after 10pm in summer per hour	£84.60
Neighbourhoods & Regeneration	Parks (Recreation)	Partial cost recovery of events in parks - Category 2	£1,325.00
Neighbourhoods & Regeneration	Parks (Recreation)	Partial cost recovery of events in parks - Category 3	£5,000 - £20,000
Neighbourhoods & Regeneration	Parks (Recreation)	Reinstatement (Refundable deposit)- category 3	£5000 - £20,000
Neighbourhoods & Regeneration	Parks (Recreation)	Reinstatement (Refundable deposit)- category 1 (+£200)	up to £10,000
Neighbourhoods & Regeneration	Parks (Recreation)	Special events hosted by commercial groups	Price on Application
Neighbourhoods & Regeneration	Parks (Recreation)	£500 -Reinstatement (Refundable deposit)- category 2 (+500)	£560.00
Neighbourhoods & Regeneration	Parks (Recreation)	Small Events	£81.50
Neighbourhoods & Regeneration	Parks (Recreation)	Soccer Adult Single	£101.92
Neighbourhoods & Regeneration	Parks (Recreation)	Soccer Junior 11-a-side Single	£61.68
Neighbourhoods & Regeneration	Parks (Recreation)	Soccer Junior 9-a-side Single	£55.04
Neighbourhoods & Regeneration	Parks (Recreation)	Soccer Junior 7-a-side Single	£37.71
Neighbourhoods & Regeneration	Parks (Recreation)	Soccer Junior 5-a-side Single	£25.48
Neighbourhoods & Regeneration	Parks (Recreation)	Rugby Adult Single	£112.10
Neighbourhoods & Regeneration	Parks (Recreation)	Rugby junior Single	£66.24
Neighbourhoods & Regeneration	Parks (Recreation)	Gaelic Adult single (with changing)	£132.50
Neighbourhoods & Regeneration	Parks (Recreation)	Gaelic Adult single (without changing)	£96.80
Neighbourhoods & Regeneration	Parks (Recreation)	Gaelic junior single (with changing)	£81.50
Neighbourhoods & Regeneration	Parks (Recreation)	Gaelic junior single (without changing)	£61.10
Neighbourhoods & Regeneration	Parks (Recreation)	Hurling Adult single	£137.50
Neighbourhoods & Regeneration	Parks (Recreation)	Hurling Junior single	£81.50
Neighbourhoods & Regeneration	Parks (Recreation)	Cricket single	£152.80
Neighbourhoods & Regeneration	Parks (Recreation)	Cricket Adult [11 week season]	£1,512.60
Neighbourhoods & Regeneration	Parks (Recreation)	Cricket Junior (11 week season)	£757.10
Neighbourhoods & Regeneration	Parks (Recreation)	Cricket junior single	£76.46
Neighbourhoods & Regeneration	Parks (Recreation)	Artificial cricket wicket (Adults) per match	£101.90
Neighbourhoods & Regeneration	Parks (Recreation)	Artificial cricket wicket (juniors) per match	£66.20
Neighbourhoods & Regeneration	Parks (Recreation)	Bowls - per green	£2,439.84
Neighbourhoods & Regeneration	Parks (Recreation)	Bowls - per rink per season	£510.00
Neighbourhoods & Regeneration	Parks (Recreation)	Tennis Court - adult, per hour	£7.13
Neighbourhoods & Regeneration	Parks (Recreation)	Tennis Court - junior, per hour	£3.82

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
Neighbourhoods & Regeneration	Parks (Recreation)	Tennis Court - where no more than 50% of players are Adults	£5.09
Neighbourhoods & Regeneration	Parks (Recreation)	Adult training soccer/rugby/Gaelic/Hurling not on a pitch (per 2 hours including changing rooms, excluding floodlights)	£91.60
Neighbourhoods & Regeneration	Parks (Recreation)	Junior training soccer/rugby/Gaelic/hurling not on a pitch (per 2 hours including changing rooms, excluding floodlights)	£50.92
Neighbourhoods & Regeneration	Parks (Recreation)	Floodlights per hour	£50.90
Neighbourhoods & Regeneration	Parks (Recreation)	Unmarked ground school/sports use (Morning or afternoon - 3 hours including changing rooms)	£81.50
Neighbourhoods & Regeneration	Parks (Recreation)	Hire of changing rooms only (during normal staffing hours)	£65.00
Neighbourhoods & Regeneration	Parks (Recreation)	Late cancellation fees	25% of the total cost
Neighbourhoods & Regeneration	Parks (Recreation)	Boot camp/ personal fitness sessions (per hour)	£65.00
Neighbourhoods & Regeneration	Parks (Recreation)	Model Aircraft Licence Fee	£53.50
Neighbourhoods & Regeneration	Parks (Recreation)	Volleyball	£40.70
Neighbourhoods & Regeneration	Parks (Recreation)	Netball	£30.00
Neighbourhoods & Regeneration	Parks (Recreation)	Memorial Plaque	£160 - £300
Neighbourhoods & Regeneration	Parks (Recreation)	Memorial bench in a park	£1600 - £2500
Neighbourhoods & Regeneration	Parks (Recreation)	Indemnity - per container per week	£304.80
Neighbourhoods & Regeneration	Parks (Recreation)	Deposit for indemnity per container	£611.20
Neighbourhoods & Regeneration	Parks (Recreation)	Access through park land - hand tools only up to 3 hours	£101.60
Neighbourhoods & Regeneration	Parks (Recreation)	Deposit - Access through park land - hand tools only	£173.00
Neighbourhoods & Regeneration	Parks (Recreation)	Indemnity through land - vehicle access only (car /van) per week	£152.60
Neighbourhoods & Regeneration	Parks (Recreation)	Deposit - Indemnity through land - vehicle access only (car /van)	£224.00
Neighbourhoods & Regeneration	Parks (Recreation)	Indemnity - Utility company works	£1,321.40
Neighbourhoods & Regeneration	Parks (Recreation)	Deposit Indemnity - Utility company works	£5,600.00
Neighbourhoods & Regeneration	Parks (Recreation)	Indemnity Scaffold Licence Fee (0-10m)	£305.60
Neighbourhoods & Regeneration	Parks (Recreation)	Indemnity Scaffold Licence Fee (10-15m)	£377.00
Neighbourhoods & Regeneration	Parks (Recreation)	Indemnity Scaffold Licence Fee (15m+)	£591.20
Neighbourhoods & Regeneration	Parks (Recreation)	Indemnity Hoarding Licence Fee(0-10m)	£304.80
Neighbourhoods & Regeneration	Parks (Recreation)	Indemnity Hoarding Licence Fee (10-15m)	£376.90
Neighbourhoods & Regeneration	Parks (Recreation)	Indemnity Hoarding Licence Fee (15m+)	£611.20
Neighbourhoods & Regeneration	Parks (Recreation)	Indemnity Skip Licence Fee (per skip per week)	£162.60
Neighbourhoods & Regeneration	Parks (Recreation)	Skips (fines) Per skip per week	£355.60
NEIGHBOURHOODS & REGENERATION	PARKS - ALLOTMENTS		
Neighbourhoods & Regeneration	Parks - Allotments	Allotment site per pole (annual) - Brent residents	£25.44
Neighbourhoods & Regeneration	Parks - Allotments	Allotment site per pole (annual) - Non-Brent residents	£35.64
Neighbourhoods & Regeneration	Parks - Allotments	Allotment site per pole (annual) for Brent residents (concessions)	£20.22
Neighbourhoods & Regeneration	Parks - Allotments	Charges for additional per pole above 5 poles (annual)	£25.44
Neighbourhoods & Regeneration	Parks - Allotments	Allotment shed rental fees (annual)	£40.50

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
NEIGHBOURHOODS & REGENERATION	PUBLIC REALM (WASTE)		
Neighbourhoods & Regeneration	Shared Contract & Data Hub (Waste)	Garden Waste Collection	£69.00
Neighbourhoods & Regeneration	Shared Contract & Data Hub (Waste)	Bulky Waste Collection (Up to 5 items)	£55.00
Neighbourhoods & Regeneration	Shared Contract & Data Hub (Waste)	Refuse Bin Purchase Charges 240L	£80.00
Neighbourhoods & Regeneration	Shared Contract & Data Hub (Waste)	Refuse Bin Purchase Charges 770L-1100L	£475.00
Neighbourhood & Regeneration	Shared Contract & Data Hub (Waste)	Charge for 240L Recycling bin purchase	£30.00
Neighbourhood & Regeneration	Shared Contract & Data Hub (Waste)	Charge for 23L Food caddy purchase	£5.00
Neighbourhood & Regeneration	Shared Contract & Data Hub (Waste)	Charge for 140L Refuse bin purchase	£65.00
PARTNERSHIPS HOUSING & RESIDENTS SERVICES	APPLICABLE TO ONLY BRENT RESIDENTS		
	Applicable to only Brent residents		
Partnerships Housing & Residents Services	Cemeteries - Brent Residents	Burial rights Carpenders Park Lawn Cemetery	£4,200.00
Partnerships Housing & Residents Services	Cemeteries - Brent Residents	Burial rights Willesden New, Alperton, Paddington Old Cemetery - Reclaim	£4,100.00
Partnerships Housing & Residents Services	Cemeteries - Brent Residents	Burial rights Willesden New, Alperton, Paddington Old Cemetery - New Plot	£6,600.00
Partnerships Housing & Residents Services	Cemeteries - Brent Residents	Interment	£1,100.00
Partnerships Housing & Residents Services	Cemeteries - Brent Residents	Burial rights - Path side graves Carpenders Park Lawn Cemetery	£5,300.00
Partnerships Housing & Residents Services	Cemeteries - Brent Residents	Interment - Path side graves	£1,070.00
Partnerships Housing & Residents Services	Cemeteries - Brent Residents	Burial rights - Woodland grave for 1 interment (includes 1 tree)	£4,350.00
Partnerships Housing & Residents Services	Cemeteries - Brent Residents	Woodland grave for (1 interment) Interment	£1,070.00
Partnerships Housing & Residents Services	Cemeteries - Brent Residents	Burial rights - Woodland grave for ashes	£3,500.00
Partnerships Housing & Residents Services	Cemeteries - Brent Residents	Woodland grave for ashes Interment	£405.00
Partnerships Housing & Residents Services	Cemeteries - Brent Residents	Grave Reopen	£2,120.00
Partnerships Housing & Residents Services	Cemeteries - Brent Residents	Vault (reopen)	£1,100.00
Partnerships Housing & Residents Services	Cemeteries - Brent Residents	Common Grave	£1,950.00
Partnerships Housing & Residents Services	Cemeteries - Brent Residents	Cremated Remains In New Half Grave Space Burial Rights & Internment	£2,770.00
Partnerships Housing & Residents Services	Cemeteries - Brent Residents	Cremated Remains In existing Grave Space Interment	£405.00
Partnerships Housing & Residents Services	Cemeteries - Brent Residents	Cremated remains in existing vault	£560.00
Partnerships Housing & Residents Services	Cemeteries - Brent Residents	Niche in Columbaria for First Five Years	£1,050.00
Partnerships Housing & Residents Services	Cemeteries - Brent Residents	Each Additional Five Years for Niche in Columbaria	£525.00
	Applicable to Non Brent residents		
Partnerships Housing & Residents Services	Cemeteries - Non-Residents	Burial rights Carpenders Park Lawn Cemetery	£8,000.00
Partnerships Housing & Residents Services	Cemeteries - Non-Residents	Burial rights Willesden New, Alperton, Paddington Old Cemetery - Reclaim	£8,100.00
Partnerships Housing & Residents Services	Cemeteries - Non-Residents	Burial rights Willesden New, Alperton, Paddington Old Cemetery - New Plot	£9,000.00
Partnerships Housing & Residents Services	Cemeteries - Non-Residents	Interment	£2,000.00
Partnerships Housing & Residents Services	Cemeteries - Non-Residents	Burial rights - Path side graves Path side graves Carpenders Park Lawn Cemetery	£8,100.00
Partnerships Housing & Residents Services	Cemeteries - Non-Residents	Burial rights - Path side graves Path side graves Willesden New, Alperton, Paddington Old Cemetery	£9,020.00
Partnerships Housing & Residents Services	Cemeteries - Non-Residents	Interment - Path side graves (earth)	£1,750.00

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
Partnerships Housing & Residents Services	Cemeteries - Non-Residents	Interment - Path side graves (earth)	£1,750.00
Partnerships Housing & Residents Services	Cemeteries - Non-Residents	Burial rights - Woodland grave for 1 interment (includes 1 tree)	£6,300.00
Partnerships Housing & Residents Services	Cemeteries - Non-Residents	Burial rights - Woodland grave for ashes	£3,900.00
Partnerships Housing & Residents Services	Cemeteries - Non-Residents	Interment - Woodland grave for ashes	£510.00
Partnerships Housing & Residents Services	Cemeteries - Non-Residents	Grave Reopen	£3,100.00
Partnerships Housing & Residents Services	Cemeteries - Non Residents	Interment	£3,000.00
Partnerships Housing & Residents Services	Cemeteries - Non Residents	Burial rights - Cremated Remains In new half grave space	£3,750.00
Partnerships Housing & Residents Services	Cemeteries - Non Residents	Interment - Cremated Remains In new half & existing grave space	£810.00
Partnerships Housing & Residents Services	Cemeteries - Non Residents	Cremated remains in existing vault	£530.00
Partnerships Housing & Residents Services	Cemeteries - Non Residents	Niche in Columbaria for First Five Years	£1,570.00
Partnerships Housing & Residents Services	Cemeteries - Non Residents	Each Additional Five Years for Niche in Columbaria	£810.00
	Applicable for both Brent residents & non residents		
Partnerships Housing & Residents Services	Cemeteries - Additional Charges	Earth Grave for 3 where applicable	£1,070.00
Partnerships Housing & Residents Services	Cemeteries - Additional Charges	Shroud timbers & slats	£515.00
Partnerships Housing & Residents Services	Cemeteries - Additional Charges	Grave surround	£270.00
Partnerships Housing & Residents Services	Cemeteries - Additional Charges	Transfer burial rights	£175.00
Partnerships Housing & Residents Services	Cemeteries - Additional Charges	Burial Register search fee	£70.00
Partnerships Housing & Residents Services	Cemeteries - Additional Charges	Chapel hire up to 2 hours	£230.00
Partnerships Housing & Residents Services	Cemeteries - Additional Charges	Saturday burials at Alperton, Paddington and Willesden	£1,020.00
Partnerships Housing & Residents Services	Cemeteries - Additional Charges	Cancellation of an interment or late arrival of funeral cortege of more than 20 mins	£495.00
Partnerships Housing & Residents Services	Cemeteries - Additional Charges	Memorial [full with Landing]	£535.00
Partnerships Housing & Residents Services	Cemeteries - Additional Charges	Non Residents - Vaults Package Paddington Old Cemetery	£22,000.00
Partnerships Housing & Residents Services	Cemeteries - Additional Charges	Vaults Package Paddington Old Cemetery	£19,000.00
Partnerships Housing & Residents Services	Cemeteries - Additional Charges	Additional Internment of Ashes	£165.00
Partnerships Housing & Residents Services	Cemeteries - Memorial Permits	Headstone / plaque	£450.00
Partnerships Housing & Residents Services	Cemeteries - Memorial Permits	Inscriptions / works	£380.00
Partnerships Housing & Residents Services	Cemeteries - Memorial Permits	Memorial removal for interment	£520.00
Partnerships Housing & Residents Services	Cemeteries - Memorial Permits	Memorial replacement after interment	£520.00
Partnerships Housing & Residents Services	Cemeteries - Memorial Permits	Memorial raise and level (full memorials)	£185.00
Partnerships Housing & Residents Services	Cemeteries - Memorial Permits	Memorial raise and level (plaques)	£105.00
Partnerships Housing & Residents Services	Cemeteries - Memorial Permits	Tree Plaque at Carpenders Park (Inc. VAT) (Single)	£555.00
Partnerships Housing & Residents Services	Cemeteries - Memorial Permits	Tree Plaque at Carpenders Park (Inc. VAT) (Double)	£600.00
Partnerships Housing & Residents Services	Cemeteries - Memorial Permits	Bench with plaque on to existing landing (Inc. VAT)	£2,850.00
Partnerships Housing & Residents Services	Cemeteries - Memorial Permits	Bench Plaques only at Carpenders Park (Inc. VAT - 5 years)	£475.00
Partnerships Housing & Residents Services	Cemeteries - Memorial Permits	Grave tendering 1 x per year, all cemeteries except Carpenders Park	£147.00
Partnerships Housing & Residents Services	Cemeteries - Memorial Permits	Grave tendering 1 x per year, Carpenders Park	£105.00
Partnerships Housing & Residents Services	Cemeteries - Memorial Permits	Concrete based bench with plaque (inc. VAT not at Carpenders Park)	£4,450.00

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
NEIGHBOURHOODS & REGENERATION	FOOD SAFETY		
Neighbourhoods & Regeneration	Food Safety	Cadaver certificate (3 working days' notice)	£83.00
Neighbourhoods & Regeneration	Food Safety	Cadaver certificate (urgent next day service)	£161.00
Neighbourhoods & Regeneration	Food Safety	Food Export Health Certificates (3 working days)	£83.00
Neighbourhoods & Regeneration	Food Safety	Food Export Health Certificates (urgent next day service)	£161.00
Neighbourhoods & Regeneration	Food Safety	Food destruction certificate	£310.00
Neighbourhoods & Regeneration	Food Safety	Freezer breakdown certificate	£310.00
Neighbourhoods & Regeneration	Food Safety	Pool water analysis single pool	£278.00
Neighbourhoods & Regeneration	Food Safety	Pool water analysis double pool	£472.00
Neighbourhoods & Regeneration	Food Safety	Schools Legionella Water Sampling	£1,800.00
Neighbourhoods & Regeneration	Food Safety	Schools Drinking Water Sampling	£600.00
Neighbourhoods & Regeneration	Food Safety	Food Hygiene Rating Scheme (FHRS) rating re-assessment	£358.00
Neighbourhoods & Regeneration	Food Safety	Food Business Start-up Scheme	£357.00
Neighbourhoods & Regeneration	Food Safety	Food Hygiene Coaching Service	£575.00
Neighbourhoods & Regeneration	Food Safety	Special treatments exhibition including any treatment from categories B, C or D	£1,640.00
Neighbourhoods & Regeneration	Food Safety	Special treatments exhibition including any treatment from categories B, C or D per applicant administering	£109.00
Neighbourhoods & Regeneration	Food Safety	Special treatments - lasers (Cat A)	£1,000.00
Neighbourhoods & Regeneration	Food Safety	Special treatments - massage, acupuncture, tattooing etc (cat B)	£810.00
Neighbourhoods & Regeneration	Food Safety	Special treatments - beauty treatments, etc (Cat C)	£485.00
Neighbourhoods & Regeneration	Food Safety	Special treatments - manicure, nose and ear piercing, etc (Cat D)	£268.00
Neighbourhoods & Regeneration	Food Safety	Special treatments - licence variation including addition or change of therapist	£141.00
Neighbourhoods & Regeneration	Food Safety	Primary Authority - bulk purchase (per hour)	£78.00
Neighbourhoods & Regeneration	Food Safety	Primary Authority - pay as you go (per hour)	£97.00
Neighbourhoods & Regeneration	Food Safety	Officer Court attendance fees (per hour)	£100.00
NEIGHBOURHOODS & REGENERATION	ENVIRONMENTAL HEALTH		
Neighbourhoods & Regeneration	Environmental Health	Contaminated Land Basic Enquiry	£68.00
Neighbourhoods & Regeneration	Environmental Health	Contaminated Land Residential Property Search	£135.00
Neighbourhoods & Regeneration	Environmental Health	Contaminated Land Commercial Property Search	£268.00
Neighbourhoods & Regeneration	Environmental Health	Part B Permits for Mobile Plant and Solvent Emission Activities. Various fees as per DEFRA's charging Scheme	Various fees from £52 to £625
NEIGHBOURHOODS & REGENERATION	WORK IN DEFAULT		
Neighbourhoods & Regeneration	Work In Default	Interest charged for Work in Default to property owner	Bank of England rate plus 8%
Neighbourhoods & Regeneration	Work In Default	Works in Default Officer Rate (per hour subject to grade)	£57.00
Neighbourhoods & Regeneration	Work In Default	Works in Default Admin Charge (Single property or shared dwellings)	£172.00
Neighbourhoods & Regeneration	Work In Default	Enforcement Officer hourly rate	£68.00

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
NEIGHBOURHOODS & REGENERATION	LICENSING		
Neighbourhoods & Regeneration	Licensing	Performing Animals Registration	£470.00
Neighbourhoods & Regeneration	Licensing	Pet Animals (Pet Shop Licence)	£470.00
Neighbourhoods & Regeneration	Licensing	Dangerous Wild Animals	£481.00
Neighbourhoods & Regeneration	Licensing	Leaflet distribution (application)	£245.00
Neighbourhoods & Regeneration	Licensing	Leaflet distribution per person	£94.00
Neighbourhoods & Regeneration	Licensing	Occasional sales (application) (Discretionary reduction of educational, charitable organisations)	£225.00
Neighbourhoods & Regeneration	Licensing	Occasional sales (per person) (Discretionary reduction of educational, charitable organisations)	£12.50
Neighbourhoods & Regeneration	Licensing	Sex establishments	£550.00
Neighbourhoods & Regeneration	Licensing	Street trading (new application)	£87.00
Neighbourhoods & Regeneration	Licensing	Street trading (variation)	£57.00
Neighbourhoods & Regeneration	Licensing	Scrap Metal Site Licence	£740.00
Neighbourhoods & Regeneration	Licensing	Scrap Metal Collectors Licence	£430.00
Neighbourhoods & Regeneration	Licensing	Explosives Licence	Various Fees from £59 - £594
Neighbourhoods & Regeneration	Licensing	Film Classification (per 15 minutes)	£75 minimum charge, £15 per 15 minutes thereafter
Neighbourhoods & Regeneration	Licensing	Premises Licence - Licensing Act 2003 (see separate list of fees for specific charges)	Various Fees from £10.50 to £64,000
Neighbourhoods & Regeneration	Licensing	Premises Licence - Gambling Act 2005 (see separate list of fees for specific charges)	Various Fees from £15 - £15,000
Neighbourhoods & Regeneration	Licensing	Marriage Licence (see separate list of fees for specific charges)	Various Fees from £600 to £1,500
Neighbourhoods & Regeneration	Licensing	Licensing Surgeries (to help businesses with applications) per hour	£68.00
Neighbourhoods & Regeneration	Licensing	Enforcement Officer hourly rate	£72.00
Neighbourhoods & Regeneration	Licensing	Pavement Tables and Chairs Licences - New application	£500.00
Neighbourhoods & Regeneration	Licensing	Casual Street Trading for Wembley Event per day	£207.00
Neighbourhoods & Regeneration	Licensing	Casual Street Trading per day	£184.00
Neighbourhoods & Regeneration	Licensing	Casual Street Trading (Discretionary charge for educational, not for profit or charitable organisations)	0 - £184 per day
Neighbourhoods & Regeneration	Licensing	Temporary Shop Front (1-6 Months plus admin fee. New applications receive one months free trading if they pay for five months)	£105.00
Neighbourhoods & Regeneration	Licensing	Temporary Independent Pitch (1-6 Months plus admin fee. New applications receive one months free trading if they pay for five months)	£3.50 per sqm/per day
Neighbourhoods & Regeneration	Licensing	Permanent Shop Front (12 months plus admin fee)	£1,185.00
Neighbourhoods & Regeneration	Licensing	Permanent Independent Pitch (12 months plus admin fee)	£4 per sqm/per day
Neighbourhoods & Regeneration	Licensing	Leaflet distribution on Sundays and Bank holidays and Wembley event day	£225 + £180 per person/per day
Neighbourhoods & Regeneration	Licensing	Street Trading Renewal Fee	£42.00
Neighbourhoods & Regeneration	Licensing	Surcharge for late application	£37.00
Neighbourhood & Regeneration	Licensing	Pavement Tables and Chairs Licences Renewal Application	£350.00
Neighbourhood & Regeneration	Licensing	Animal Boarding Licence including Inspection, New Licence, Home Boarder	£487.00
Neighbourhood & Regeneration	Licensing	Animal Boarding Licence including inspection, Renewal Licence, Home Boarder	£396.00

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
Neighbourhood & Regeneration	Licensing	Franchisee Arrangers Licence, including inspection, New Licence	£426.00
Neighbourhood & Regeneration	Licensing	Franchisee Arrangers Licence, including inspection Renewal Licence	£274.00
Neighbourhood & Regeneration	Licensing	Dog Day Care Licenece including Inspection, New Licence, Less than 10 Dogs	£426.00
Neighbourhood & Regeneration	Licensing	Dog Day Care Licenece, including Inspection, New Licence, More than 10 Dogs	£548.00
Neighbourhood & Regeneration	Licensing	Dog Day Care Licence, including Inspection, Renewal Licence	£335.00
Neighbourhood & Regeneration	Licensing	Dog Breeding Establishment Licence, New Licence, Domestic Dwelling	£445.00
Neighbourhood & Regeneration	Licensing	Dog Breeding Licence including Inspection, Renewal, Domestic Dwelling	£335.00
Neighbourhood & Regeneration	Licensing	Other Animal Licences including Inspection, Subject to Requirements	£400 - £650, POA
NEIGHBOURHOODS & REGENERATION	ENVIRONMENTAL ENFORCEMENT		
Neighbourhoods & Regeneration	Environmental Enforcement	Temporary Crossing – Commercial:	£696.80
Neighbourhoods & Regeneration	Environmental Enforcement	Crane Oversail	£696.80
Neighbourhoods & Regeneration	Environmental Enforcement	Crane (mobile platform):	£418.26
Neighbourhoods & Regeneration	Environmental Enforcement	Scaffold Licence Fee (0-10m)	£292.78
Neighbourhoods & Regeneration	Environmental Enforcement	Scaffold Licence Fee (10-15m)	£374.39
Neighbourhoods & Regeneration	Environmental Enforcement	Scaffold Licence Fee (15m+)	£739.61
Neighbourhoods & Regeneration	Environmental Enforcement	Hoarding Licence Fee(0-10m)	£292.78
Neighbourhoods & Regeneration	Environmental Enforcement	Hoarding Licence Fee (10-15m)	£374.39
Neighbourhoods & Regeneration	Environmental Enforcement	Hoarding Licence Fee (15m+)	£739.61
Neighbourhoods & Regeneration	Environmental Enforcement	Skip Licence Fee	£70.40
Neighbourhoods & Regeneration	Environmental Enforcement	Building Material licences (Residential)	£206.07
Neighbourhoods & Regeneration	Environmental Enforcement	Builders Material Licences (Commercial)	£363.91
Neighbourhoods & Regeneration	Environmental Enforcement	Skip Company - Annual Registration fee:	£351.97
Neighbourhoods & Regeneration	Environmental Enforcement	Container/Portacabin licences:	£418.26
Neighbourhoods & Regeneration	Environmental Enforcement	Admin fee for refunds processing	£81.86
Neighbourhoods & Regeneration	Environmental Enforcement	Temporary Crossing – Domestic	£206.07
Neighbourhoods & Regeneration	Environmental Enforcement	Crane /mobile platform (per week)	£625.35
Neighbourhoods & Regeneration	Environmental Enforcement	Building Material licences (Residential/week)	£56.11
Neighbourhoods & Regeneration	Environmental Enforcement	Builders Material Licences (Commercial/week)	£106.11
Neighbourhoods & Regeneration	Environmental Enforcement	Container/Portacabin licence (per week)	£189.81
NEIGHBOURHOODS & REGENERATION	TRADING STANDARDS		
Neighbourhoods & Regeneration	Trading Standards	Registration of Premises for Auction	£414.00
Neighbourhoods & Regeneration	Trading Standards	Primary Authority - bulk purchase (per hour)	£78.00
Neighbourhoods & Regeneration	Trading Standards	Primary Authority - pay as you go (per hour)	£97.00
Neighbourhoods & Regeneration	Trading Standards	Verification of Weights & Measures Equipment (per hour)	£81.00
Neighbourhoods & Regeneration	Trading Standards	Calibration of Weights for Business 9per Hour	£81.00

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
Neighbourhoods & Regeneration	Trading Standards	Testing of Working Standards and Testing Equipment for other Las (per hour)	£81.00
Neighbourhoods & Regeneration	Trading Standards	Extra Staff Member assisting with above W&M fees (per hour)	£51.00
Neighbourhoods & Regeneration	Trading Standards	Use of Safety Lab (per hour)	£88.00
Neighbourhoods & Regeneration	Trading Standards	Licence to store explosives	Various Fees from £59 - £594
Neighbourhoods & Regeneration	Trading Standards	Financial Investigator (per hour, plus contract fee)	£51.00
Neighbourhoods & Regeneration	Trading Standards	Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014, Full Charge Penalty Notice	Up to £5,000
Neighbourhoods & Regeneration	Trading Standards	Penalty Charge Notice under Part 3, Chapter 3 Consumer Rights Act 2015 (Maximum Penalty)	Up to £5,000
Neighbourhoods & Regeneration	Trading Standards	Full financial penalty issued under the Tenant's Fees Act 2019 (Maximum Penalty)	Up to £30,000
Neighbourhoods & Regeneration	Trading Standards	Full financial penalty issued under the Client Money Protection Schemes for Property Agents (Requirement to Belong to a Scheme etc.) Regulations 2019	Up to £30,000
Neighbourhoods & Regeneration	Trading Standards	Enforcement Officer hourly rate	£72.00
Neighbourhoods & Regeneration	Trading Standards	Senior Enforcement Officer hourly rate	£97.00
PARTNERSHIPS HOUSING & RESIDENTS SERVICES	REGISTRATION AND NATIONALITY		
Partnerships Housing & Residents Services	Registration and Nationality	Bank Holidays any time	£1,000.00
Partnerships Housing & Residents Services	Registration and Nationality	Ceremonies held between 7am-9am and 7pm -9pm at any venue	£1,000.00
Partnerships Housing & Residents Services	Registration and Nationality	Private Ceremonies (M- F)	£153.00
Partnerships Housing & Residents Services	Registration and Nationality	Citizenship Private Ceremony-weekend	£200.00
Partnerships Housing & Residents Services	Registration and Nationality	Issue of Letter	£35.00
Partnerships Housing & Residents Services	Registration and Nationality	Secure Deposit	£173.00
Partnerships Housing & Residents Services	Registration and Nationality	Change of date	£65.00
Partnerships Housing & Residents Services	Registration and Nationality	Notice priority fee per notice	£24.00
Partnerships Housing & Residents Services	Registration and Nationality	Repository Certificates	£12.50
Partnerships Housing & Residents Services	Registration and Nationality	Repository Certificates priority	£38.50
Partnerships Housing & Residents Services	Registration and Nationality	Marriages/CPs - Register Office	£56.00
Partnerships Housing & Residents Services	Registration and Nationality	Marriages/CPs -Religious buildings	£104.00
Partnerships Housing & Residents Services	Registration and Nationality	General Search	£20.00
Partnerships Housing & Residents Services	Registration and Nationality	Correction local authority completed	£83.00
Partnerships Housing & Residents Services	Registration and Nationality	Correction General Registration completed	£99.00
Partnerships Housing & Residents Services	Registration and Nationality	Space 17	£44.00
Partnerships Housing & Residents Services	Registration and Nationality	Foreign divorce - local authority completed	£55.00
Partnerships Housing & Residents Services	Registration and Nationality	Foreign divorce -General Register office completed	£83.00
Partnerships Housing & Residents Services	Registration and Nationality	Notices Standard	£42.00
Partnerships Housing & Residents Services	Registration and Nationality	Notices DRO	£57.00
Partnerships Housing & Residents Services	Registration and Nationality	Citizenship	£130.00
Partnerships Housing & Residents Services	Registration and Nationality	Approved Premises Ceremonies Internal Monday - Friday Before 4pm	£369.00

Fees and Charges for 2025 - 2026

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
Partnerships Housing & Residents Services	Registration and Nationality	Approved Premises Ceremonies Internal Monday - Friday After 4pm	£655.00
Partnerships Housing & Residents Services	Registration and Nationality	Approved Premises Weddings Internal Saturday Before 4pm	£513.00
Partnerships Housing & Residents Services	Registration and Nationality	Approved Premises Weddings Internal Saturday After 4pm	£734.00
Partnerships Housing & Residents Services	Registration and Nationality	Approved Premises Weddings Internal Sunday Before 1pm	£628.00
Partnerships Housing & Residents Services	Registration and Nationality	Approved Premises Weddings Internal Sunday After 1pm	£819.00
Partnerships Housing & Residents Services	Registration and Nationality	Approved Premises Weddings external Monday - Friday Before 4pm	£560.00
Partnerships Housing & Residents Services	Registration and Nationality	Approved Premises Weddings external Monday - Friday After 4pm	£634.00
Partnerships Housing & Residents Services	Registration and Nationality	Approved Premises Weddings external Saturday Before 4pm	£634.00
Partnerships Housing & Residents Services	Registration and Nationality	Approved Premises Weddings external Saturday After 4pm	£767.00
Partnerships Housing & Residents Services	Registration and Nationality	Approved Premises Weddings external Sunday Before 1pm	£697.00
Partnerships Housing & Residents Services	Registration and Nationality	Approved Premises Weddings external Sunday After 1pm	£907.00
Partnerships Housing & Residents Services	Registration and Nationality	License of approved premises for civil marriage or partnership* up to 50	£700.00
Partnerships Housing & Residents Services	Registration and Nationality	License of approved premises for civil marriage or partnership* 51 to 100	£800.00
Partnerships Housing & Residents Services	Registration and Nationality	License of approved premises for civil marriage or partnership* 101 to 200	£900.00
Partnerships Housing & Residents Services	Registration and Nationality	License of approved premises for civil marriage or partnership* 201 to 300	£1,000.00
Partnerships Housing & Residents Services	Registration and Nationality	License of approved premises for civil marriage or partnership* 301 to 400	£1,100.00
Partnerships Housing & Residents Services	Registration and Nationality	License of approved premises for civil marriage or partnership* 401 to 500	£1,200.00
Partnerships Housing & Residents Services	Registration and Nationality	License of approved premises for civil marriage or partnership* Over 500	£1,600.00
Partnerships Housing & Residents Services	Registration and Nationality	Late Ceremony Fee	£176.00
Partnerships Housing & Residents Services	Registration and Nationality	Approved Premises external Garden Monday - Friday Before 4pm	£400.00
Partnerships Housing & Residents Services	Registration and Nationality	Approved Premises external Garden Monday - Friday After 4pm	£679.00
Partnerships Housing & Residents Services	Registration and Nationality	Approved Premises external Garden Saturday Before 4pm	£534.00
Partnerships Housing & Residents Services	Registration and Nationality	Approved Premises external Garden Saturday After 4pm	£754.00
Partnerships Housing & Residents Services	Registration and Nationality	Approved Premises external Garden Sunday Before 1pm	£642.00
Partnerships Housing & Residents Services	Registration and Nationality	Approved Premises external Garden Sunday After 1pm	£826.00
Partnerships Housing and Resident Services	Registration and Nationality	Amore Suite (Venue Hire up to 2 hours)	£375.00
Partnerships Housing and Resident Services	Registration and Nationality	Own catering or Caterer from the Brent Civic List	£475.00
Partnerships Housing and Resident Services	Registration and Nationality	Outside Caterer	£100.00
Partnerships Housing and Resident Services	Registration and Nationality	Room 10 Tue (All Year)	£250.00
Partnerships Housing and Resident Services	Registration and Nationality	Room 10 Mon - Wed (Low Season November - January)	£250.00
PARTNERSHIPS HOUSING & RESIDENTS SERVICES	COMMUNITY PROTECTION		
Partnerships Housing & Residents Services	Community Protection	Enforcement of ASB Tools and Powers . Fixed penalty notices of breach of CPN.	£100.00
Partnerships Housing & Residents Services	Community Protection	Community Safety Officers hourly rate	£53.30

Fees and Charges for 2025 - 2026

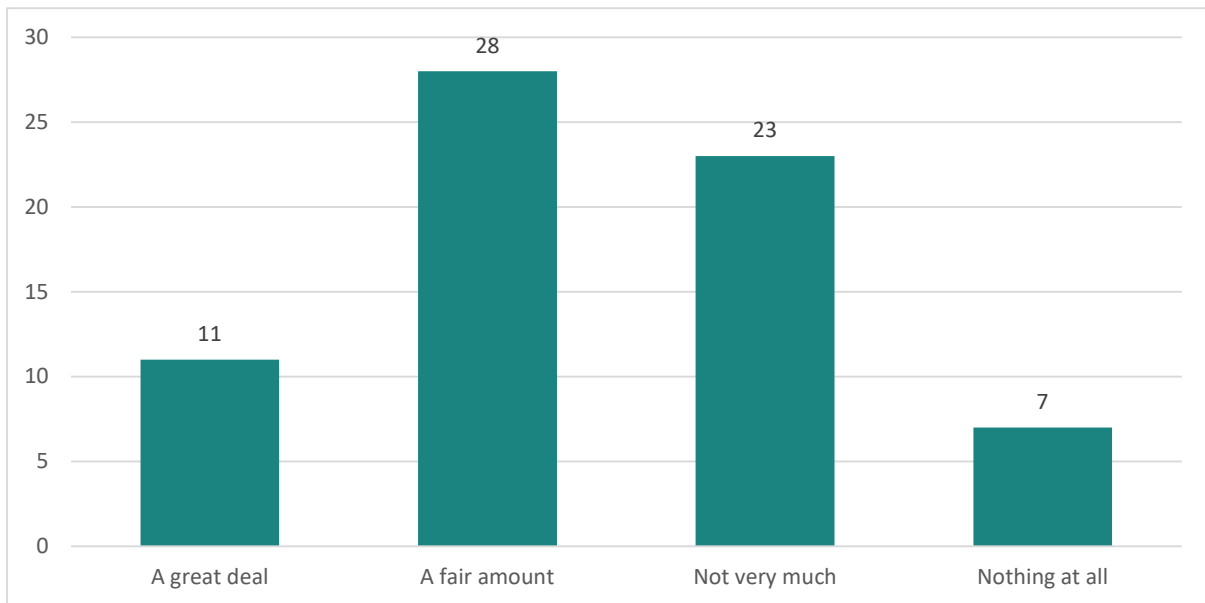
DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	25/26 PROPOSED CHARGE £ (Excl. VAT)
Partnerships Housing & Residents Services	Community Protection	Enforcement of statutory nuisance to residents	£100.00
Partnerships Housing & Residents Services	Community Protection	Enforcement of statutory nuisance to Businesses	£400.00
Neighbourhoods & Regeneration	Community Protection	Processing of CCTV footage for insurance companies.	£130.00
Neighbourhoods & Regeneration	Community Protection	Public Spaces Protection Order Enforcement Nuisance Vehicles .	£100.00
PARTNERSHIPS HOUSING & RESIDENTS SERVICES	FUNERAL SERVICE		
Partnerships Housing & Residents Services	Funeral Service	Direct Cremation (Unattended Cremation)	£1,115.00
Partnerships Housing & Residents Services	Funeral Service	Baseline Private Funeral Costs	£1,830.00
Partnerships Housing & Residents Services	Funeral Service	Deceased Transfer fee	£290.00
Partnerships Housing & Residents Services	Funeral Service	Baseline Private Funeral Costs	£1,830.00
PARTNERSHIPS HOUSING & RESIDENTS SERVICES	PARISH LIAISON SERVICE		
Partnerships Housing & Residents Services	Parish Liaison Service	Public Health Funeral Administration Fee	£885.00
Partnerships Housing & Residents Services	Parish Liaison Service	Public Health Funeral Storage Fee	£175.00
Partnerships Housing & Residents Services	Parish Liaison Service	Public Health Funeral Officer Search Fee	£340.00
PARTNERSHIPS HOUSING & RESIDENTS SERVICES	MORTUARY SERVICE		
Partnerships Housing & Residents Services	Mortuary Service	Long Stay Charges (daily after 30 days)	£23.00

2025/26 Budget Consultation Survey Analysis

Responses

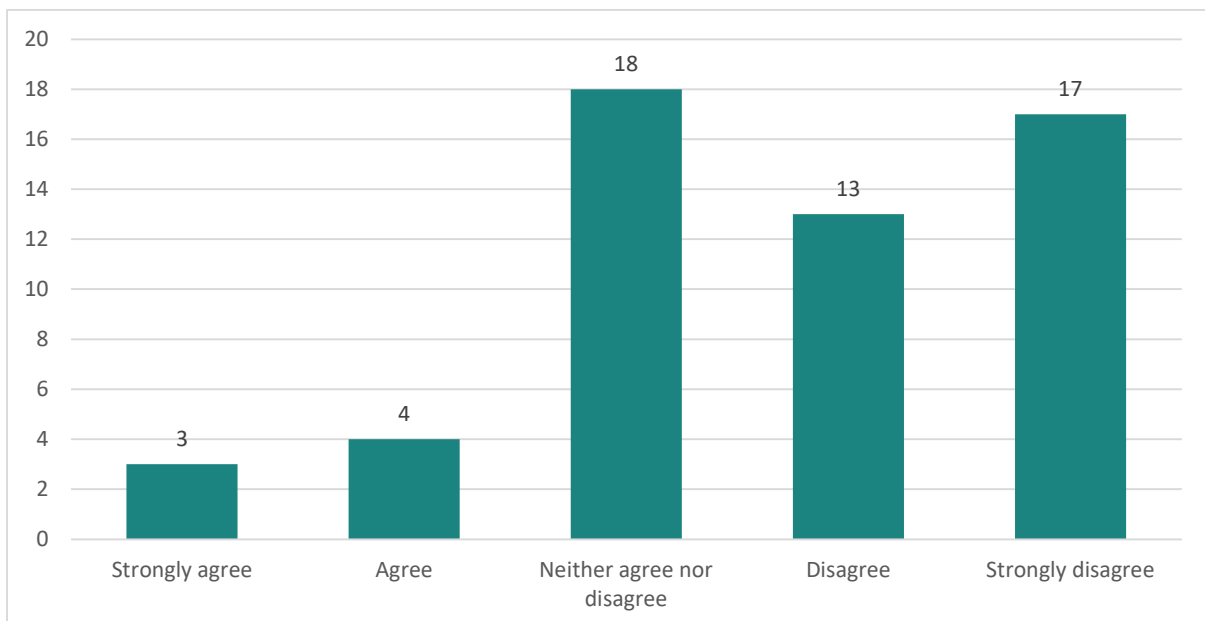
As of 28 January 2025, there were 69 responses to the budget consultation survey.

Having read the draft budget proposals, how much do you now feel you understand the council's overall financial position and the need to both increase council tax and deliver savings in 2025/26 in order to deliver a balanced budget?



Slightly more residents felt they understood the council's budget proposals (57%) compared to those that didn't (43%).

To what extent do you agree or disagree with the budget proposals?



14 residents declined to complete this question, leaving 55 responses in total. Residents were most likely to neither agree nor disagree with the budget proposals, with 33% selecting this option. Of those residents who did give a clear preference, they were more likely to pick 'Disagree' or 'Strongly disagree' (55%) compared to those who selected 'Agree' or 'Strongly agree' (13%).

Cross Reference

		Level of agreement				
		Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Level of understanding	A great deal	2	2		2	3
	A fair amount	1	2	9	4	3
	Not very much			6	7	7
	Nothing at all			3		4

The chart above compares the number of respondents that agreed with the budget with how well those respondents said they understood it. The segments with the highest response were those that felt they understood the survey a fair amount but neither agreed nor disagreed with its proposals (9 responses), and those that had not very much understanding and either disagreed or strongly disagreed with the proposals (14 responses).

Comments

Do you have any comments about our draft budget strategy?

This question received 36 comments. Comments or themes that occurred multiple times included:

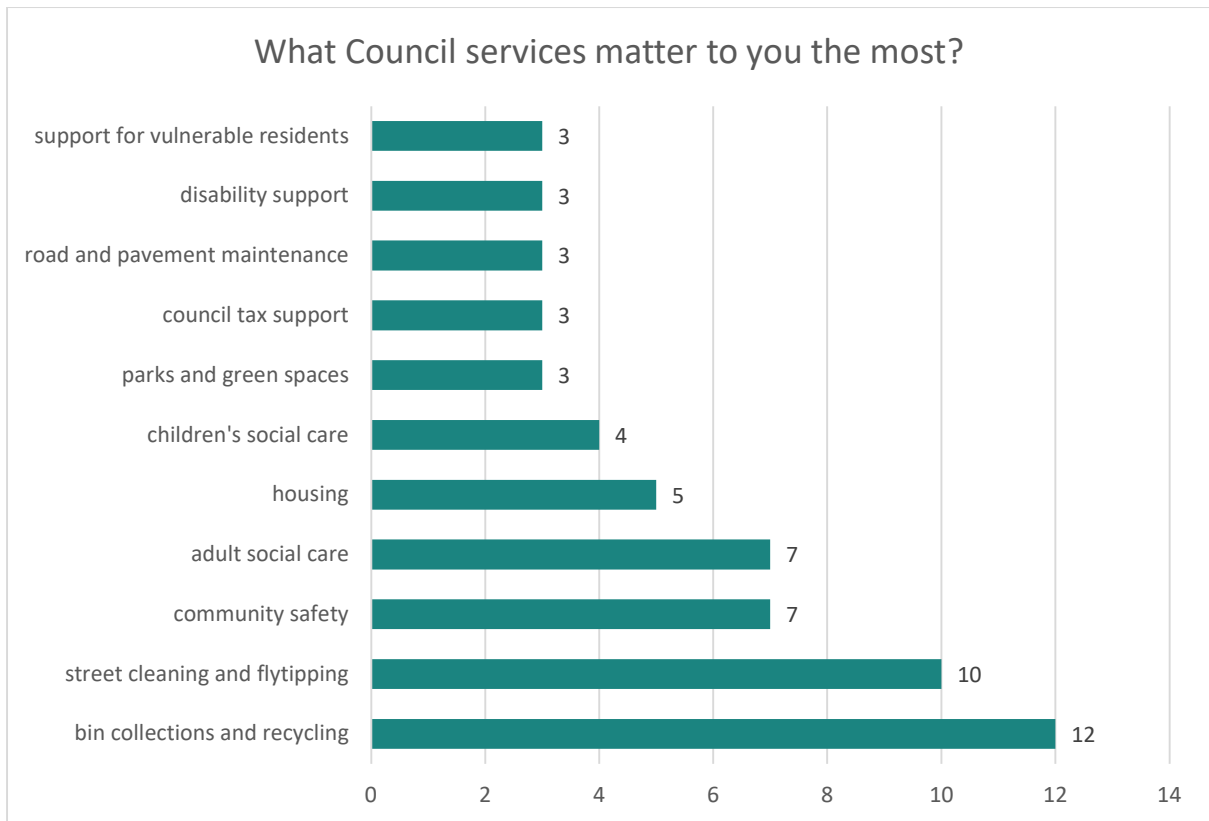
- References to difficult times ahead
- The feeling that the proposed increase of 4.99% on council tax was too much
- Concern about the impact on vulnerable residents as a result of changes to the council tax support scheme
- General concerns about housing provision, including the cost of temporary accommodation and the experience of those living in it
- A lot of emphasis on street cleaning, refuse collection and recycling, and that service should be of a higher standard and this could be impacted by the cuts.
- The impact of Wembley Stadium and Wembley Arena's events on local resources

Please provide any other comments you may have on the proposals for the 2025/26 Budget.

This question received 25 comments. Comments or themes that occurred multiple times included:

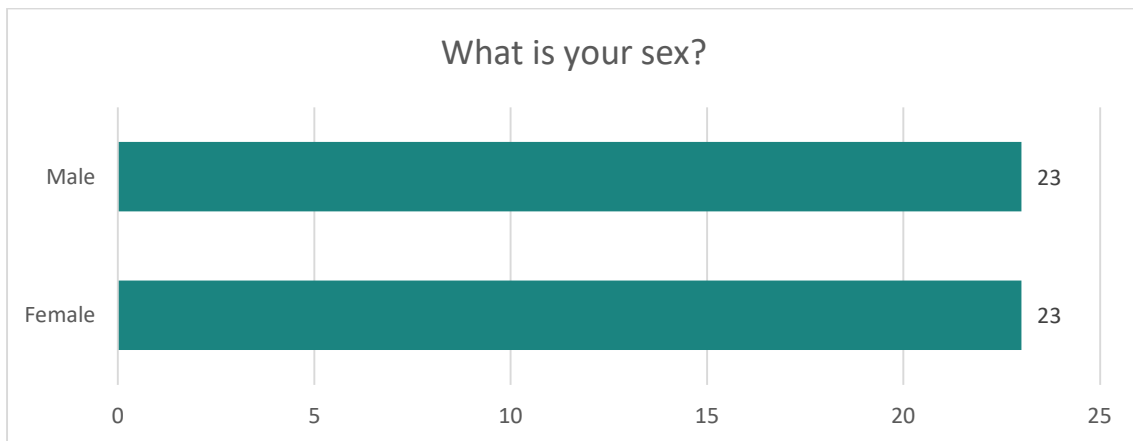
- Reiteration that the proposed council tax increase was too much of a burden on residents
- An anticipated increase in fly tipping with the proposed cost of bulk waste collections increasing

Responses from both questions asking for comments were combined into a word cloud showing the most common words used.



Equality Monitoring Questions

Sex

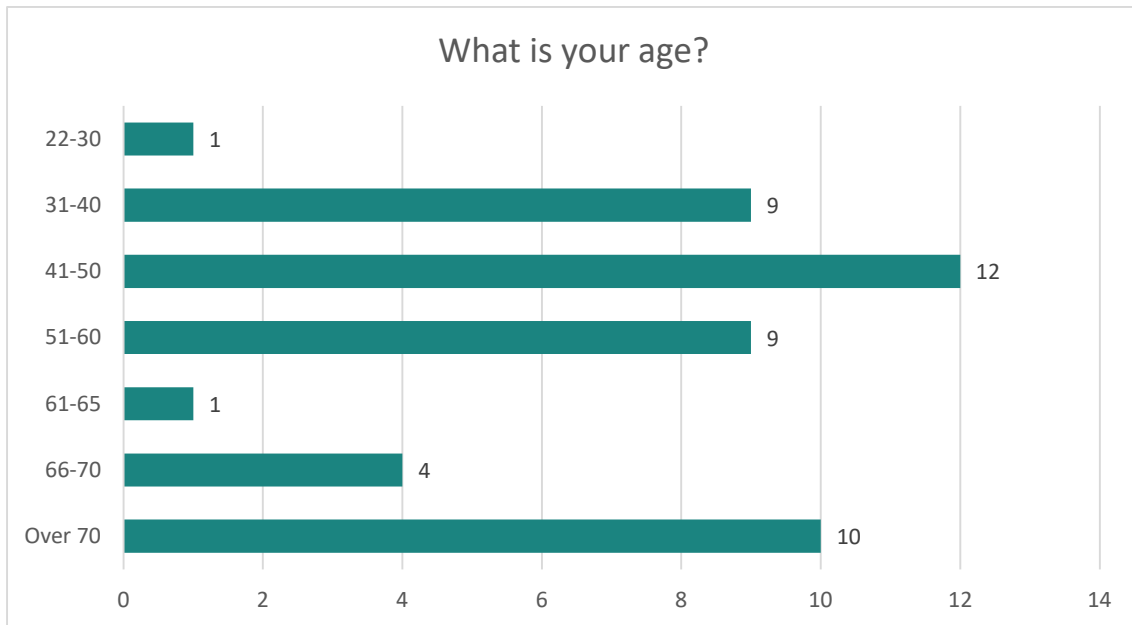


23 respondents identified as female and 23 as male. Three selected 'prefer not to state', and 20 declined to complete the question.

Gender Identity

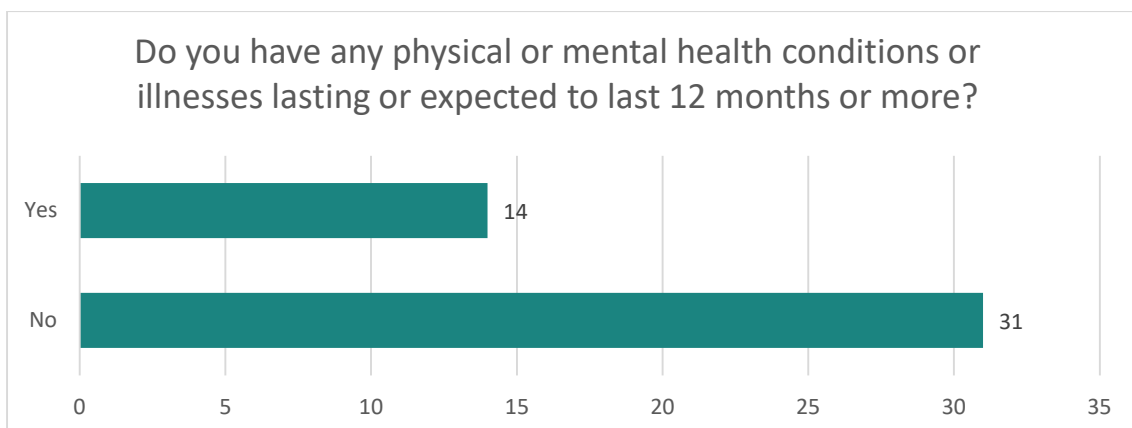
46 respondents said that the gender they identified with matched their sex registered at birth. Two selected 'prefer not to state', and 21 declined to complete the question.

Age Group



The greatest number of respondents (12) are aged between 41 – 50. Four respondents chose 'prefer not to state' and 19 declined to complete the question.

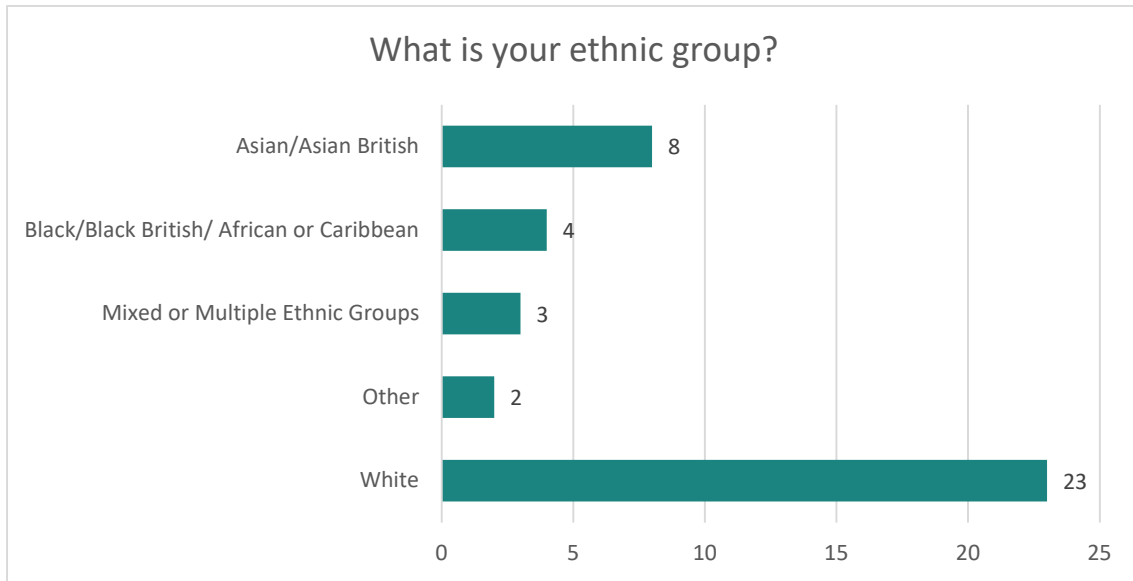
Disability



14 respondents said they have a physical or mental health condition or illness expecting to last 12 months or more, with 31 respondents saying they did not. Four respondents chose 'prefer not to state' and 20 declined to answer the question.

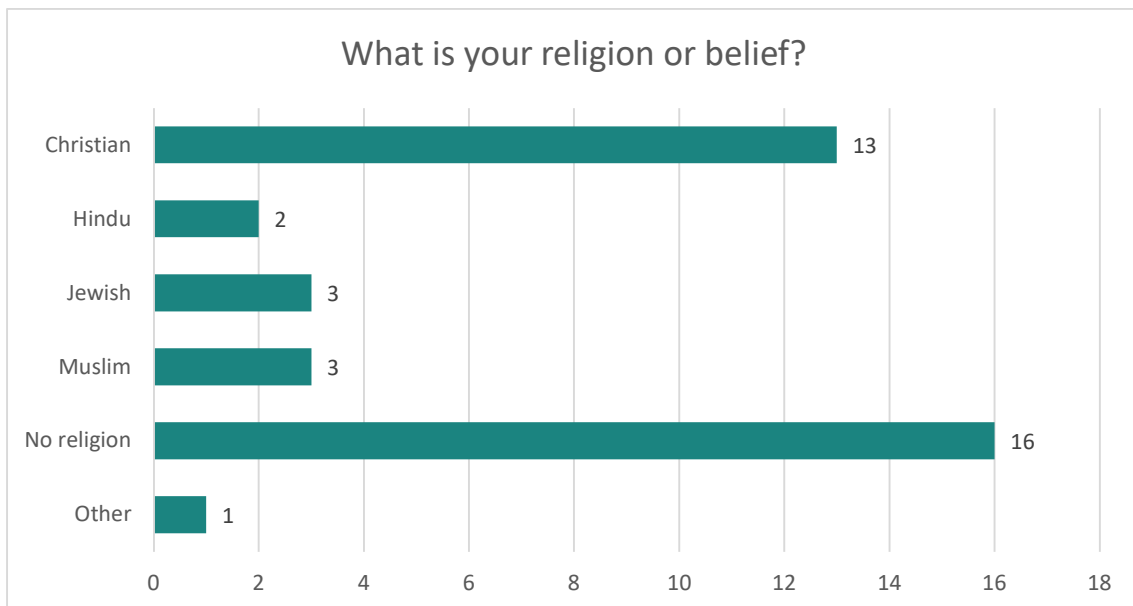
When asked for additional details, there were 18 responses. Six respondents chose 'prefer not to state', six selected mobility impairment and two selected physical impairment or hearing impairment. There was one response each for mental health or hidden impairment such as diabetes or epilepsy. No one chose multiple responses.

Ethnicity



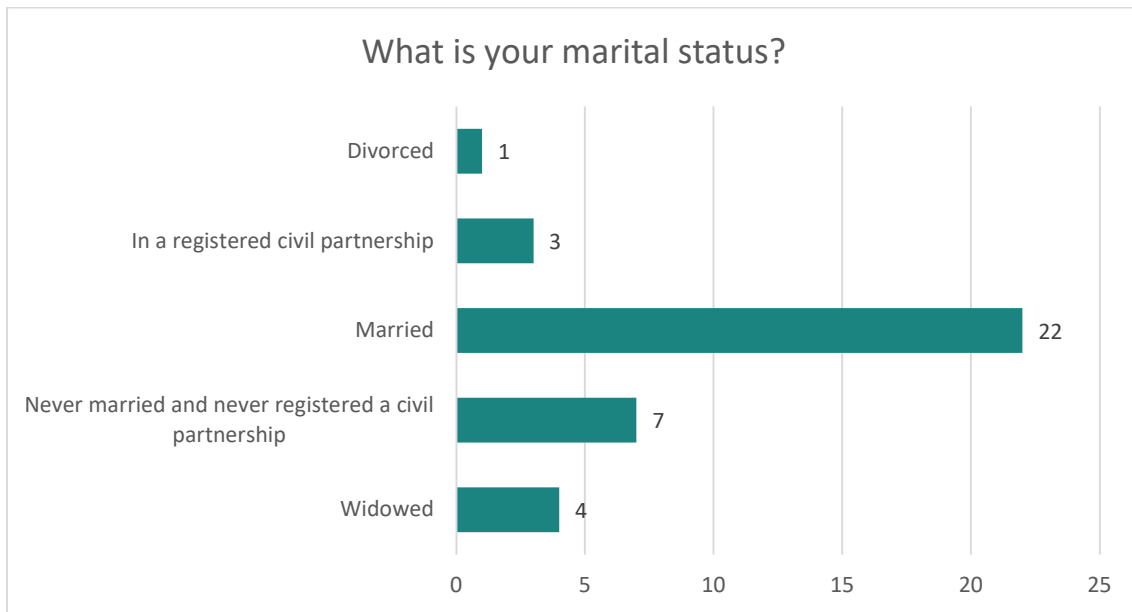
The majority of respondents were white (23 respondents). Six respondents chose 'prefer not to state' and 23 declined to complete the question.

Religion



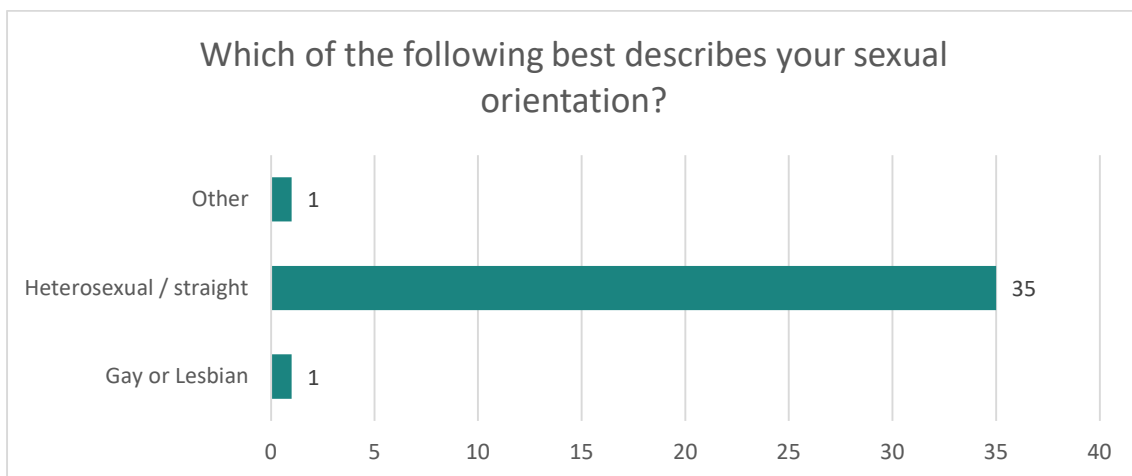
Most respondents specified their religion as Christian (13 responses) or no religion (16 responses). Seven respondents chose 'prefer not to state' and 24 declined to complete the question.

Marital Status



The majority of respondents were married, making up 22 responses. Seven respondents chose 'prefer not to state' and 25 declined to complete the question.

Sexual Orientation



35 respondents identified as heterosexual, with one respondent choosing gay or lesbian and one respondent choosing other. Six respondents chose 'prefer not to state' and 26 declined to complete the question.

Budget Promotion

Engagement activity	Audience	Dates
Promoted across Brent's Have Your Say platform, Citizens Lab	7,581 registered users	November 2024
Promoted in Brent Voluntary, Community and Social Enterprise sector newsletter	1,200 subscribers from over 500 organisations	November 2024
Promoted in Brent Business newsletter	Over 9,000 subscribers	December 2024
Budget Special Brent Connects – Autumn round	A total of 51 residents in attendance	Wembley 21 November 2024 Harlesden 26 November 2024 Kingsbury & Kenton 2 December 2024 Kilburn 12 December 2024 Willesden 9 January 2025

Additional representation

The council has received further comments from Brent Mencap, a voluntary organisation in Brent working with people of all ages with a learning disability, as part of the consultation and is attached in Appendix L (ii).

A response to the comments raised is set out below.

Response from Adult Social Care

In relation to CHW01 (Offer reablement service to a wider range of customers), CHW02 (Expand the Shared Lives programme), CHW03 (Modernise Adult Social Care Approach to Assessment and Review) and CHW04 (Implementation of Telecare Service Charges) we acknowledge the challenges and concerns raised, particularly regarding the length of time it takes to get a response from Adult Social Care, safeguarding, and housing departments. We understand that the current processes for assessment are not always efficient, flexible, or responsive enough to meet the pressing needs of residents however we are continually working to improve our process and reduce waiting times.

We are committed to exploring how we can work better together to address these challenges and improve our services for customers. We recognise the importance of valuing and listening to the lived experiences and expertise of our users and the voluntary sector. As result we have implemented coproduction across the service and have an active coproduction advisory board. We will continue to engage in joint meetings and collaborative efforts to ensure that the needs of our residents are met in a timely and effective manner.

We want to assure you that all customers will be assessed, and support will be right-sized to ensure that no one who needs support will be left at risk. We are exploring digital solutions to complement service provision and are willing to work with you to explore best practices.

We also want to assure you that our aim is to meet customer needs more appropriately by using various methodologies, including digital solutions and community resources. We are committed to being innovative and working in co-production with our customers to explore best practices. We believe that by leveraging these approaches, we can provide better support and ensure that no one who needs assistance is left at risk.

In relation to the case example used we are willing to look into this matter to understand what has not worked well. We are committed to working with you in the spirit of co-production to develop our processes and improve outcomes for our customers. By collaborating and leveraging innovative approaches, we can ensure that the needs of our community are met more effectively.

Response from Children & Young People

In relation to CYP01 (Reduction in weekend use of the Gordon Brown Centre) and CYP02 (Reduction in discretionary spend), we continue to work with the VCS to supplement support for our looked after and care experienced young people. We have worked with Barnardo's and are currently working with Grandmentors (for tenancy support) and are about to commence work with the Family Rights Group to promote family networks for young people. The Council's endorsement of care as a protected characteristic in November 2024 will ensure care experienced young people's needs are prioritised. Advice and support will continue to be provided by a young person's Personal Advisor as set out in the Leaving Care Act 2000.

This page is intentionally left blank

This feedback is from users, trustees and staff at Brent Mencap. It is based on supporting nearly 19000 Brent residents in 2023-24-it highlights their lived experiences and the challenges faced by staff to get them the right support. Initial feedback was presented to the Budget Scrutiny Task Group in November 2024. The headings in this report are based on questions asked by the Task Group.

Our full 2023-2024 annual report is available here:

<https://register-of-charities.charitycommission.gov.uk/en/charity-search/-/charity-details/3961687/accounts-and-annual-returns>

Key priorities/challenges for Brent Mencap over the next 12 months and beyond

- 1) **Lack of interim/long term for our wellbeing and creative activities**, delivered to people with a learning disability autism and mental health problems. Last year we supported 95 people to participate, meet their friends, engage with Brent Council and share their problems. We supported about 60 of them with complex safeguarding, DV and other issues, enabled them to meet support workers here and signposted them to other sources of support. They would not seek help digitally or at hubs The National Lottery Community fund has turned down 2 applications for longer term funding since 2023. We will need to find about 50K to continue with this service in 2025-26.
- 2) **The increase in employer NI and the lowering of the NI Threshold from April 2025.**
This will mean an increase of around 100k for us due to the number of staff employed. In previous years we were able to use part of our surplus to top up non funded wellbeing and creative activities. This is increasingly unlikely in 25-26.
- 3) **Competition for Charitable funding has increased dramatically**, and several big funders have suspended applications due to volume of need and applications.
- 4) **Length of time it takes us to get a response from Adult Social Care**, safeguarding, housing department re user/patients' issues. While some joint meetings have taken place to look at closer working, the level of demand and fewer staff is frustrating for staff and residents. Current processes for assessment are already not efficient, flexible or responsive enough to meet pressing needs and it will get worse. Please see detailed feedback below on pages 4 and 5 for examples of the kind of responses we get to serious issues.
- 5) **No prospect of anything improving for residents in near future. Our users' lived experiences, our evidence and expertise are not valued, recognised or listened to**
 - Recent reports highlight many problems eg the recent CQC Brent ASC report and a Healthwatch Brent ASC report. Our self-advocacy group's experiences and Brent Mencap efforts highlight gaps in service for PWLD, people with other disabilities and long-term conditions e.g. lack of ASC responses or support into employment. There is a long history of user experiences/views and voluntary sector expertise being ignored. We feel disrespected and not listened to by a Council that is unresponsive and dismissive.
 - This is a waste of valuable knowledge and capacity. E.g. Brent Mencap offers wellbeing activities to PWLD. We know that the Council has a duty to signpost people who do not qualify for ASC support to prevent any escalation. In 4 years, we have had few if any referrals through this route. It makes us wonder if any signposting happens at this post-assessment/screening stage.

- Some Council Officers have listened and made changes. After receiving feedback about service from the Hubs, one of the Hub managers did make changes to the process. This will have saved significant time for both residents and Hub staff. More generally, it feels like if something is not on the Council's agenda nothing will be responded to. Whilst we acknowledge the introduction of recent ASC Co-Production work, we have little confidence that overall anything will improve or change.

6) **Continued lack of specialist support for PWLD to get into work –**

Recent feedback from Brent Mencap resulted in a GLA employment support fund being targeted to neurodiverse people, including PWLD. However, this only lasts for 6 months until March 2025. This also followed 2 years of campaigning and repeated questions from our self-advocacy group – questions to which they have still not had any open/candid/straight answers to. Despite the evidence we have consistently highlighted, we recently received a list of organisations the Council says support PWLD who we know do not in reality offer support to this group. So, in cases like this it seems like the Council are not listening or trusting external/lived experiences, or just don't see this issue as important or worth even acknowledging.

Brent Mencaps Experience of Cost of Living on Brent People we support.

Our SPLWs have supported more patients with different enquiries, these still include housing, benefits, social care, mental health support, money and debt, access to food, employment, education, transport, family matters.

Social Care is the top enquiry for the year 23-24. Our SPLWs have supported patients with care packages, liaising with social services, requesting care needs assessments and reviews, OT referrals and supporting patients to get adjustments to their homes to better manage.

Housing and benefits have been one of our top enquiry types for many years now. The type of housing issues patients seek support with include homelessness, living in unsuitable accommodation and rehousing. The type of benefit enquiries our SPLWs have supported with includes eligibility checks, providing information and advice, making claims, supporting with application forms, and checking progress.

Requests for support with transport (supporting patients with blue badge, taxi card, dial-a-ride application process).is more common now (26 In this current year), as are requests for support with Council tax discounts (also 26) and debt than previous years.

Safeguarding referrals increased to 87. Issues include neglect, financial abuse, emotional abuse, and domestic violence. Many of the patients referred to our team are vulnerable (due to their health conditions, mental health, or age) so we ensure that all are staff are well trained to pick up safeguarding matters. Many of these are referred to the safeguarding team, however, some require attention from other services such as the police, or mental health team who we liaise with to ensure patient gets the support they need. Our SPLWs have also dealt with many suicidal patients, so we ensure they receive suicide awareness training.

Our SPLWs report more enquiries related to Immigration. In the year 23-24 157 patients came to our SPLWs for immigration advice and support. Our SPLWs cannot provide legal advice or deal with immigration matters, however, they can provide information and refer to specialist services

Brent Mencap Areas of concern in the Draft Budget 2025/26, and why

CHW01 25.26 wider re-enablement service

Please see feedback above in bullet 4 and 5 above about the challenges we and our users face. We would like to know how this proposal would have improved things for the users cited in the example below. We suggest using these examples when developing any service proposals to see what difference such a system would have made to them

We appreciate the better project planning detailed in the proposal , but it is lacking detail in what kinds of therapist would be involved, how many people would benefit from the change.

This proposal doesn't recognise the need for an EIA and also pays scant regard for the need for accessible information to meet the customers communication needs as laid out in the Accessible Information Standard regulations, in force now for 7 years, which both Brent Council and the local NHS continue to ignore.

CHW02 -25-26 Shared lives respite

We are familiar with the scheme and know several people who lived with Shared lives carers and benefited from it. The proposal aims to provide more respite care but again, as above is vague about the number of people who would benefit and whether people would miss their previous respite places.

The sentence under Equality screening contradicts what is in the chart below, here it is recommended as needing to be done

CHW03 25-26 Modernise ASC assessment and review

The proposed options include "tunnelling" them to Brent Carers Centre. How does the officer know they have the capacity needed? (NB is tunnelling a new form of channelling?)

On-line assessment is likely to be difficult for many people with disabilities due to lack of digital and literacy skills, data.

Using community venues sounds great on paper but there are limited confidential spaces available in these places or in NHS GP practices

In the milestones there is talk of a project team including community organisations, as usual assuming we have the time and capacity to get involved in numerous meetings. We are likely not to be listened to nor our input valued. Engagement with organisations and residents is not done well and people do not feel listened to.

CHW04 Charges for Telecare

It's hard to imagine how the proposed income of 500k will be achieved without actually knowing how many people are likely to be charged and how much. It's unlikely, given the proposed project plan that any significant amount will be raised in the first year. We imagine that current users will be surprised and worried about the extra cost and may struggle to pay it. The charges letters sent out to users /customers we have seen in the last year are written in accountant speak and are difficult to understand. The letters and any communication about this would need to have regard to the Accessible Information Standards Regulations as mentioned before. It's possible some people will struggle with online payments systems.

CYP01 reduction of use of Gordon Brown Centre, CYP 02 cuts in discretionary payments

Sad and regrettable cuts. There seems to be no mention within this and other proposals to cut support to LAC about seeking external charitable funding, using NCII funds or finding corporate sponsorship to maintain support to this vulnerable group of young people.

There need to be clarity about who would provide the benefits advice and practical support to the young people. There should be an EIA as Disabled young people are a significant amount of LAC.

The impact the draft budget proposals are likely to have on service users/residents, if any

Realistically nothing in these proposals will make the lives of Brent residents any better, given the level of poverty and need in Brent. We expect some of the proposals will make getting the right support even harder for vulnerable people, given the examples shared below and on page 5 showing how long it can already take us to resolve issues for residents.

The necessary council tax increase will affect many people, and the proposed reduction in council Tax support will affect a significant number too. Other Vol Sector colleagues will provide detailed evidence of the likely effect .

Brent Mencap's Priorities for Council Investment over the next 3 years

- 1) Interim funding for our creative and wellbeing services to continue
- 2) Development of meaningful, long term employment related support for people with a learning disability
- 3) Use of NCIL funding to support vol sector groups extra workload as a result of the cuts, NI increases faced by vol sector and barriers vulnerable people face getting the right support detailed below.
- 4) Payment to vol sector for engaging in project planning groups, You pay others as consultants, why not your own voluntary sector?
- 5) A top-down commitment and strategic plan to fully implement the Accessible Information Standard in Brent

Recent Adverse Adult Safeguarding and ASC experiences of Brent Mencap Users

Here is some feedback from our wellbeing co-ordinator re his experiences of recent efforts to safeguard vulnerable people who come to our wellbeing and creative activities

N. Called with his wife who is his carer. Diagnosed with LD. No Adult Social Care input.

1. Financial abuse – people colleagues convincing him to transfer money - taking him for lunch and making him pay.
2. Unfairly treated at work as a security guard, compared to his colleagues – frequent changes of workplace – no reasonable adjustments e.g. less changes or support to learn new journeys.
3. Given additional work shifts, but the pay given to others who didn't work.
4. Indications he needs ASC support (wife has caring duties for their new child).

This came to the attention of his wife's support worker – children and families. She brought them to me due to her lack of LD knowledge. I raised a safeguarding alert. S/guarding wrote back instructing me to –Report to the Police, Help him with work issues, Signpost him to ASC assessment.

I wrote back letting her know of my limited areas of expertise, my current role and capacity AND reminding Council of their duty to respond to these issues/needs/concerns.

They wrote back to say they know their duties – but also that Safeguarding is ‘everybody’s business’. Which is true, to a degree. I agreed to report to the Police and attempt to signpost him to Work Rights Centre, if the s/guarding team assure he is assessed by ASC.

Post-script – The family did not want to report to the Police because extended family were involved in the financial abuse – so they felt vulnerable. I helped them to report it to CATCH – London Assembly initiative – on advice from voluntary sector experts.

Work Rights could not support him. Fed this back to s/guarding as an outstanding concern. the wife’s support worker brought him to me – but she should have reported straight to safeguarding.

In contrast, following another s/guarding alert re P, the s/worker asked why I was trying to resolve the concerns – I should have reported it and done nothing else.

S/guarding referrals now seem to be dealt with by duty social workers who are given a 5-day working week to **close** these. With 2 recent concerns sent to s/guarding they have tried to push the responsibility back to us. In both cases I reminded them of the severity of the issues and that they are duty bound to investigate. In one they said they would try to hand it on to an investigating officer, but due to shortage of staff they could not promise that! I reminded her that since –

- She is a highly vulnerable person with a history of safeguarding interventions.
- Someone has taken £12000 from her.
- Partner is being controlling & abusive, including trying to isolate her from safe places like BM.
- She has absolutely no money and no food.
- ‘Seeing what you can do’ is not in any way an appropriate action.

In each case they have finally taken some action. When that is by an investigating officer, we hear nothing. When it is passed to a s/worker they do get in touch – to find out what’s happened.

In P’s case an investigating officer did explore, taking 3 weeks and providing no feedback – then handed it over to a social worker, who took 2 weeks to arrange a meeting with concerned parties. On arrival she appeared to have no details of the case, despite the investigation.

She said she would – Assess the person’s needs, in about 2-weeks’ time, Recommend a care package for approval. A non-ASC Council Officer reminded the s/worker that –P has no money, Cannot manage her money, Needs food. So cannot wait for weeks.

All this time P has a keyworker who discovered the money was missing. Knew about the abusive partner. Knew she had no food. Did not raise a s/guarding concern. Then said she would when I told her she needed to and still did not report it. I knew she wouldn’t, so I raised it myself. It took 13 weeks for another support worker to be put in place.

M needed support to attend a valuable activity after a safeguarding alert. Allocated to a social worker. This took over 16 weeks Support is still not in place. We don’t know if our recommendation to refer to the Behavioural Intervention Team at Kingswood was actioned, despite many calls to social worker. The emotional and mental impact on M will be significant.

We expect all these cases to re-emerge in the future, needing more urgent and costly statutory involvement when more timely, less expensive preventative action could have been taken now. It’s worrying Brent Mencap’s skilled workers find it so hard get the right support at the right time.

This page is intentionally left blank

ADVICE FROM THE CORPORATE DIRECTOR, LAW AND GOVERNANCE**1. INTRODUCTION**

This appendix sets out in some detail Members' individual responsibilities to set a legal budget and how Members should approach the task. It also reminds Members about the rules concerning pecuniary and other interests.

2. WHEN THE BUDGET MUST BE SET

Under Section 31A of the Local Government Finance Act 1992, budget calculations have to be made before 11th March, but they are not invalid merely because they are made on or after 11th March. However, it is a legal duty to set the Council Tax by that date and delay in setting the Council Tax will have very serious financial consequences. It will render the Council vulnerable to legal proceedings requiring it to set the tax. In any event, it is important that the tax is set well in advance of 1st April as no sum is payable for Council Tax until 14 days after the date of posting bills. Serious financial losses will accrue very soon from a late setting of Council Tax as income is delayed and interest is foregone.

An important feature of Council Tax is that the statutory budget calculation must be followed exactly. If not the Council Tax resolution will be invalid and void.

3. SETTING OF THE COUNCIL TAX

Section 30 of the Local Government Finance Act (the Act) provides that no amount of council tax may be set before the earlier of the following—

- (a) 1st March in the financial year preceding that for which the amount is set;
- (b) the date of the issue to the authority of the last precept capable of being issued to it (otherwise than by way of substitute) by a major precepting authority for the financial year for which the amount is set.

This year the GLA meeting at which the precept will be set will take place in the afternoon of the 25 February 2025. In the event that the precept is not issued by the GLA by the time Council comes to make its decision on 27 February, the Council will only be able to calculate the Brent element of the council tax at that meeting. It seems unlikely this situation will arise this year.

Section 67 of the Act permits the setting of the council tax to be delegated to a special council tax setting committee established under that section. In the event that the GLA precept is not available at the time the council sets its budget, a meeting of the committee established under this section would be called so that the council tax can be set by 11 March.

4. NOTICE

There is a requirement to publish notice of the amount set for Council Tax in at least one local paper within 21 days of the Council's decision under section 38(2) of the Local Government and Finance Act 1992. There is also a duty to consult with representatives of Non-Domestic Ratepayers about the proposed revenue and capital expenditure before the budget requirement is calculated under section 65 of the Local Government and Finance Act 1992.

5. MEMBERS' FIDUCIARY DUTIES

The obligation to make a lawful budget each year is shared equally by each individual Member. In discharging that obligation, Members owe a fiduciary duty to the Council Taxpayer.

The budget must not include expenditure on items which would fall outside the Council's powers. Expenditure on lawful items must be prudent, and any forecasts or assumptions such as rates of interest or inflation must themselves be rational. Powers to spend money must be exercised bona fide for the purpose for which they were conferred and any ulterior motives risk a finding of illegality. In determining the Council's overall budget requirement, Members are bound to have regard to the level of Council Tax necessary to sustain it. Essentially the interests of the Council Taxpayer must be balanced against those of the various service recipients.

Within this overall framework, there is of course considerable scope for discretion within the 2025/26 financial year, especially on the part of the Cabinet. Setting a budget is not the same as deciding what expenditure will in fact be incurred. To budget for expenditure is to estimate likely expenditure and/or make financial provision for such expenditure. However, Members will bear in mind that in making the budget commitments are being entered which will have an impact on future years. Some such commitments are susceptible to change in future years, such as staff numbers which are capable of upward or downward adjustment at any time. Other commitments however impose upon the Council future obligations which are binding and cannot be adjusted, such as loan charges to pay for capital schemes. For some specific proposals within the overall Budgetary framework, Cabinet decisions have already been made. For some other proposals, subject to relevant consultation where necessary, decisions by the Cabinet will need to be made, especially where the making of such a decision would result or would be likely to result in the permanent closure of a facility used by the public or a permanent and significant reduction in the level of services or facilities provided to the public other than where such closure or reduction in service is considered necessary by the relevant strategic director for reasons of health and safety.

In making those subsequent decisions the Cabinet will be required to consider all relevant matters including the results of any consultation and the Council's equality duties. Should the Cabinet (or other decision maker) consider it

appropriate, for example when being asked to make service changes to achieve a budget reduction and having taken into account all relevant facts (including but not limited to the results of any consultation and after due consideration of the Council's equalities duties) they have the option of not making the budget reductions detailed within the overall budget. They will still be required to balance the budget overall using the appropriate constitutional procedures, for example, finding the savings from elsewhere or using reserves and otherwise complying with the Council's rules on budget setting and management.

Only relevant and lawful factors may be taken into account and irrelevant factors must be ignored. A Member who votes in accordance with the decision of his or her political group but who does so after taking into account the relevant factors and professional advice will be acting within the law. Party loyalty and party policy are capable of being relevant considerations for the individual Member provided the member does not dogmatically toe the party line without considering the relevant factors and professional advice and without properly exercising any real discretion.

Under the Brent Member Code of Conduct members are required when reaching decisions to have regard to relevant advice from the Corporate Director, Finance and Resources and the Monitoring Officer (the Corporate Director, Law and Governance). If the Council should fail to set a budget at all or fail to set a lawful budget, contrary to the advice of these two officers there may be a breach of the Code by individual members if it can be demonstrated that they have not had proper regard to the advice given.

6. ARREARS OF COUNCIL TAX AND VOTING

In accordance with section 106 of the Local Government Finance Act 1992 ("the 1992 Act"), where a payment of Council Tax that a member is liable to make has been outstanding for two months or more at the time of a meeting, the Member must disclose the fact of their arrears (though they are not required to declare the amount) and cannot vote on any of the following matters if they are the subject of consideration at a meeting:

- (a) Any decision relating to the administration or enforcement of Council Tax.
- (b) Any budget calculation required by the Local Government Finance Act 1992 underlying the setting of the Council Tax.
- (c) Any recommendation, resolution or other decision which might affect the making of the Annual Budget calculation.

Members should note the following points:

- (i) These rules are extremely wide in scope. Virtually any Council decision which has financial implications is one which might affect the making of the budget underlying the Council Tax for next year and thus is caught. The former DoE (now MHCLG) shared this interpretation as it made clear in its letter to the AMA dated 28th May 1992.

- (ii) The rules do not apply just to full Council meetings but extend to committees and sub-committees of the Council and to the Cabinet.
- (iii) Members who make a declaration are not entitled to vote on the matter in question but are not prevented by the section from taking part in the discussion.
- (iv) Members will have a defence under section 106 of the 1992 Act if they did not know that the section applied to them (i.e., that they were in arrears to the relevant extent) at the time of the meeting. Thus unwitting Members who for example can prove that they did not know and had no reason to suppose at the time of the meeting that their bank has failed to honour a standing order will be protected should any prosecution arise.
- (v) It is not enough to state that a benefit application has been submitted which has not yet been determined, as Members remain liable to pay pending determination.
- (vi) Breach of the rules is a criminal offence under section 106 of the 1992 Act which attracts a maximum fine at level 3 on the standard scale, currently £1,000.

Members' attention is also be drawn to the effect of the Local Authorities (Standing Orders)(England)(Amendment) Regulations 2014 which came into effect on 25 February 2014 which is that where any vote is taken at a Council meeting on setting the budget for the authority, the Minutes of the meeting will record the names of all Councillors present at the vote and how each Councillor voted (for or against) or the fact that they abstained from voting.

7. DISCLOSABLE PECUNIARY INTERESTS

Members are reminded to consider whether they have a disclosable pecuniary interest or a personal interest in the setting of the council's budget. If a member has a relevant interest they must disclose the interest at the meeting, subject to the provisions in the Code in respect of sensitive interests. If the interest is:

- a disclosable pecuniary interest; or
- a personal interest which a member of the public knowing the facts would reasonably regard it as so significant that it is likely to prejudice their judgement of the public interest (and it affects their financial position or the financial position of a connected person (as defined in the Code) or relates to a regulatory matter affecting or likely to affect them or a connected person.

The member may not participate in the discussions or vote on the matter, although if the interest is prejudicial but not a disclosable pecuniary interest, the member may remain for the purposes of making representations or asking questions.

Members should seek early advice to avoid any confusion on the night of the meeting if they consider they have a relevant interest.

Dispensations

The Council's Monitoring Officer may, on written request from a Member, grant a dispensation to relieve the applicant from the restrictions on participation and voting. Dispensation may be granted if:-

- Without the dispensation the number of persons prohibited from participating would be so great a proportion to impede the effectiveness of the meeting;
- The representation of different political groups would be affected and likely to alter the likely outcome of any voting at the meeting;
- Granting the dispensation is in the interests of persons living in the Borough;
- Every Member of the Council's Cabinet would be precluded from participating in the meeting;
- It is appropriate to grant a dispensation.

Dispensation may be granted for up to 4 years. A dispensation will mean that the Member to whom it is granted can speak and vote on a matter in which they have a relevant interest. Where the Monitoring Officer is undecided on the best response, and time is not of the essence, the decision could be passed to Audit & Standards Committee for decision. There is no Audit & Standards Committee meeting currently fixed before the budget setting meeting.

8. RESPONSIBILITIES OF THE DIRECTOR OF FINANCE AND RESOURCES, MONITORING OFFICER AND AUDITORS' POWERS

Director of Finance and Resources and Monitoring Officer

Section 114 of the Local Government Finance Act 1988 places the Corporate Director, Finance and Resources under an obligation to prepare a report (to full Council) if it appears to him that the expenditure the Authority proposes to incur in a financial year is likely to exceed its resources available to meet that expenditure. A failure to take note and act on such a report could lead to a complaint under the Member Code of Conduct. Similarly, the Council's Monitoring Officer is required to report to Full Council if it appears to her that a decision has been or is about to be taken which is or would be unlawful or would be likely to lead to maladministration.

Under section 25 of the Local Government Act 2003 the Corporate Director, Finance and Resources is required to report to the authority on the robustness of the estimates made for the purposes of the calculations required to be made by the Council and the adequacy of the proposed financial reserves. These are the estimates which the Cabinet is required to determine and submit to Full Council and are contained within this report. However, if the Council were minded to agree a budget based on different estimates e.g. if Council did not agree with the estimates provided by the Cabinet then those estimates which the Council would adopt would effectively become 'the estimates' for the purpose of Section 25 and as such should be subject to a report by the Corporate Director, Finance and Resources.

External Auditors' Powers

Section 91 of the Local Government Act 2000 and section 19A of the Audit Commission Act 1998 provide that an External Auditor may issue an "Advisory Notice" if he has reason to believe that an Authority is about to take a course of action which, if pursued to its conclusion, would be unlawful and likely to cause a loss or deficiency. This power is to be used where the matter is significant either in amount or in principle or both.

While the advisory notice has effect it is not lawful for the authority to implement or take the course of action in question unless it has considered the issues raised in the notice and given the auditor notice that it intends to proceed with that course of action in a specified period and that period has expired.

In addition, it is also open to the Auditor to apply for judicial review on any decision of an Authority or failure to act which it is reasonable to believe would have an effect on the accounts of an Authority.

9. SPECIFIC BUDGET ADVICE

Balances and Other Budget Calculations

A local authority must budget so as to give a reasonable degree of certainty as to the maintenance of its services. In particular, local authorities are required by section 31A(2)(b) and (c) of the Local Government Finance Act 1992 to calculate as part of their overall budget what amounts are appropriate for contingencies and reserves. The Council faces various contingent liabilities set out in the main budget report. Furthermore, the Council must ensure sufficient flexibility to avoid going into deficit at any point during the financial year. Members will need to pay careful attention to the advice of officers here. As set out previously, under section 25 of the Local Government Act 2003 the Corporate Director, Finance and Resources is required to report to the authority on the adequacy of the proposed financial reserves.

In addition to advising on the robustness of the estimates as set out above, the Corporate Director, Finance and Resources is also required to report on the robustness of the proposed financial reserves. The same advice applies to these as to the other calculations required to be made by the Council.

Having considered the officer's report the Council is then required to "*have regard to the report*" but it is not required to adopt the recommendations in it. However, Members must demonstrate they have acted reasonably if they do not adopt the recommendations.

Localism Act 2011

Sections 72 to 79 and Schedules 5 to 7 of the Localism Act 2011 amended the legislation regarding the calculation of council tax. Schedule 5 of the Localism Act provides for a council tax referendum to be held if an authority increases its

relevant basic amount of council tax in excess of principles determined by the Secretary of State. Authorities will not be able to exceed the Secretary of State's principles without having held such a referendum. The principles applicable for 2025/26 are discussed at paragraphs 6.12 to 6.13 of the main report.

Alternative Proposals

If alternative proposals to those contained in this report are moved at the budget setting meeting, the Corporate Director, Finance and Resources will need to consider if the estimates or proposed financial reserves contained in this report are affected and whether a further report (which may be oral) is required under section 25 of the Local Government Act 2003. If the Corporate Director, Finance and Resources is unable to report on the estimates or the reserves because of the lateness of the alternative proposals then he will not be able to comply with this statutory requirement. The Act does not say what happens if this duty is not fulfilled and nor does it say whether the Council can set the budget without that advice. It follows from this then that there is no express statutory prohibition. However, the authority is at risk of a Judicial Review by an interested person, e.g. a resident, if the Council has failed to have regard to a report of the Corporate Director, Finance and Resources on the estimates and reserves used for its budget calculations.

Capital Programme

The requirements of the "*Prudential Code*" established in the Local Government Act 2003 are set out in the report.

Expenditure Charged to the Housing Revenue Account

Members will be aware that the Housing Revenue Account (HRA) is by law to be maintained separately from the General Fund and there are strict rules which determine to which account any expenditure must be charged. There are only very limited areas of discretion here. Members should bear in mind that if they wished to review any current determination which affects the apportionment of charges between the General Fund and HRA, they would need to do so on the basis of an officers' report and specific legal advice. The Housing Revenue Account must be maintained in balance throughout the year and the Council is under a duty to prevent a debit balance in the Housing Revenue Account pursuant to Section 76 Local Government and Housing Act 1989.

Equalities Legislation

Section 149 of the Equality Act 2010 sets out the public sector equality duty which requires the Council, when exercising its functions to have 'due regard' to the need to eliminate discrimination (both direct and indirect discrimination), harassment and victimization and other conduct prohibited under the Equality Act, and to advance equality of opportunity and foster good relations between

those who share a 'protected characteristic' and those who do not share that protected characteristic.

A 'protected characteristic' is defined in the Equality Act as:

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race; (including ethnic or national origins, colour or nationality)
- religion or belief;
- sex;
- sexual orientation.

Marriage and civil partnership are also a protected characteristic for the purposes of the duty to eliminate discrimination.

Having due regard to the need to 'advance equality of opportunity' between those who share a protected characteristic and those who do not, includes having due regard to the need to remove or minimize disadvantages suffered by them. Due regard must also be had to the need to take steps to meet the needs of such persons where those needs are different from persons who do not have that characteristic, and encourage those who have a protected characteristic to participate in public life.

Complying with the duty may involve treating some people better than others, as far as that is allowed by the discrimination law.

Due regard to the need to eliminate discrimination, advance equality, and foster good relations must form an integral part of the decision making process. The Council must consider the effect that implementing a particular policy will have in relation to equality before making a decision.

There is no prescribed manner in which the equality duty must be exercised. However, the council must have an adequate evidence base for its decision making. This can be achieved by gathering details and statistics on who use the facilities. A careful consideration of this assessment is one of the key ways in which the Council can show "due regard" to the relevant matters. Where it is apparent from the analysis of the information that the proposals would have an adverse effect on equality then adjustments should be made to avoid that effect (mitigation).

The duty is not to achieve the objectives or take the steps set out in s.149. Rather, the duty on public authorities is to bring these important objectives relating to discrimination into consideration when carrying out its functions. "Due regard" means the regard that is appropriate in all the particular circumstances in which the authority is carrying out its functions.

There must be a proper regard for the goals set out in s.149. At the same time, the council must also pay regard to any countervailing factors, which it is proper and reasonable for them to consider. Budgetary pressures, economics and

practical factors will often be important. The weight of these countervailing factors in the decision making process is a matter for the Council.

The equality and diversity implications of budget proposals are considered at all stages of the budget process, from the development of the initial budget strategy, through consideration of individual growth and savings proposals, to the production of service development plans. The processes in place are therefore aimed at ensuring that the budget proposals in this report do not discriminate against communities or individuals because of age, ethnicity, gender, disability, religion, or sexual orientation, and support the council in meeting its other duties to promote equal opportunities and good race relations.

Council Tax Support Scheme

The council tax base used for the calculation of the council tax in this report includes the proposed amendments to the Council Tax Support Scheme to be presented to Full Council alongside this report on 27 February 2025. If the Council Tax Support Scheme amendments are rejected by Full Council or differ from those taken into account in the determination of the tax base the budget will not be a balanced budget without an adjustment. Paragraph 6.18 of the main report sets out the action that will be taken to resolve this situation should it arise.

This page is intentionally left blank



Brent

**BRENT COUNCIL PAY POLICY
STATEMENT**

Financial Year 2025/26

April 2025

Contents

Purpose.....	6
Strategic Context	6
Employee Benefits.....	7
Pay Rates and Scales	7
Remuneration of Senior Management (Chief Officers)	7
Remuneration of Lowest Paid Employees	8
London Living Wage.....	8
Pay Multiple.....	8
Job Grading.....	8
Local Conventions for the GLPC Job Evaluation Scheme	9
Pay on Appointment	10
Annual Pay Progression	10
Performance Related Pay and Bonuses	11
National / Regional Pay Agreements	11
Market Supplements	11
Fees for Election Duties	11
Pensions	11
Payments on Termination of Employment	12
Re-employment of Employees.....	12
Tax avoidance	12
Publication and access to information.....	13

BRENT COUNCIL PAY POLICY STATEMENT Financial Year 2025/26

Purpose

The Council's pay policy outlines Brent's policy on pay and benefits for all employees (excluding schools) and has been developed to meet the relevant statutory provisions of the Localism Act 2011.

The pay policy will be reviewed on an annual basis and will be approved by Full Council in advance of each new financial year.

The pay policy statement can be amended during the course of any financial year, but only by a resolution of the Full Council. The revised version of the statement will be published as soon as reasonably practicable.

Strategic Context

The current and future pay and benefit arrangements are embodied in the Council's Strategies and Policies which reflects the Borough Plan priorities. The Council's Borough Plan provides the strategic framework for the Council's workforce and people priorities.

The overarching objective for the Workforce Strategy is to have a high performing workforce that provides the best services it can and which can truly understand and meet the needs of all our diverse communities to enable the organisation to achieve its goals for the borough.

Key priorities of the Workforce Strategy are:

- Workforce planning;
- Workforce insight and experience;
- Workforce growth and development;
- Workforce ways of working.

These priorities have been determined with the aim of achievement of the overall outcome of having and maintaining a skilled and engaged workforce.

The Council is committed to being a good employer and maintaining its excellent track record in employing a diverse workforce which reflects the local community. In order to recruit and retain a high-quality workforce, the Council will pay its staff at appropriate salary levels to attract and retain staff, throughout the Council, particularly those in hard to recruit roles.

Employee Benefits

The Council's pay arrangements and terms and conditions play a key role in enabling the Council to fully realise its objectives and ensuring the workforce is 'fit for purpose'. The Council is committed to fair and equitable pay and benefits arrangements to maintain a flexible, talented and performance focused workforce. The Council published its Gender Pay Gap Report on 18 March 2024. This revealed that the overall mean gender pay gap based on data taken from the HR databases on 31 March 2023 was 6.0% and the median gender pay gap was 8.8%.

All the Council's pay arrangements are contained within a single policy document.

Pay Rates and Scales

Pay scales are reviewed annually in line with the relevant national agreements and any changes are usually effective from 1 April or 1 September each year depending on the pay scales applicable to different groups of staff.

The following pay scales have been adopted by the Council:

- Greater London Provincial Council (GLPC) London Pay Scales (main pay scales)
- Senior Manager Pay Scales (senior managers including Chief Officers)
- Soulbury Pay Scales (Education Psychologists, Advisors and Inspectors)
- Teaching Pay Scales (for centrally employed local authority teachers)

The Senior Manager Pay Scale includes adoption by the Council of a revised pay scale for the Council Management Team, effective from April 2022, which takes account of the scale of roles and provides clear delineation between Council Management posts and those of other senior managers.

Remuneration of Senior Management (Chief Officers)

The Council defines its senior management as the top 3 tiers in the management structure. This includes all statutory and non-statutory roles. It comprises the Chief Executive, Corporate Directors and Directors.

Currently the pay, expenses and key benefits for the Council Management Team are published on the Council's website. The Council Management Team comprises the Chief Executive and the Corporate Directors.

The rates of pay of the Chief Executive and Corporate Directors and other Senior Managers are in accordance with the Council's senior manager pay scales. The Council may, from time to time, engage senior managers under contracts for services. The Council generally will aim to pay such individuals at a rate consistent with the pay of directly employed staff performing a comparable role, although there may be exceptional circumstances which support a higher pay rate for a short-term period to ensure continuity of service and meet any statutory obligations.

Remuneration of Lowest Paid Employees

The Council defines its lowest paid employees as those staff paid on the lowest established grade and scale point which in Brent is Scale 1 spinal column point 2 of the Greater London Provincial Council (GLPC) Pay Scales which is currently £27,345 per annum or the pay of its lowest paid employee where they are on a higher salary which is currently Scale 1, spinal column point 3 at £27,729.

London Living Wage

The Council has implemented the London Living Wage. All staff (including Apprentices) are paid at or above the London Living Wage. The Council is an accredited London Living Wage Employer and asks its contractors supplying services to the Council to pay their staff the London Living Wage. As contractors are employers in their own right, the Council cannot force contractors to pay the London Living Wage but has built into its procurement procedures a requirement to do so in relation to council contracts where possible. The Council also encourages schools to pay the London Living Wage.

Pay Multiple

The 'pay multiple' is the ratio between the highest paid salary and the lowest/median average salary of the Council's workforce. The Council's highest paid employee is the Chief Executive. The current median salary is £43,299.

The lowest pay multiple is 1:8.5; the median pay multiple is 1:5.4.

This is within what is regarded as good practice for the median salary multiple as described by Will Hutton in his 2011 Fair Pay Review in the Public Sector which identified multiples at or around 8.00. The Council has not set a target for a maximum multiple. The lowest pay multiple has decreased from 1:10:6 in 2016/2017.

Job Grading

Single Status was introduced in 2009 for staff on the main pay scales. Single Status introduced common job evaluation schemes and pay scales for the Council's former manual workers, administrative, professional, technical and clerical employees with the exception of education psychologists, nursery nurses, youth and community workers, chief officers and the chief executive.

There are a small number of staff who have yet to move over to Single Status. We also have a small number of employees who have TUPE'd into the Council. These employees remain on their original terms and conditions until agreed otherwise.

Senior managers including chief officers have locally determined rates of pay which are linked to national negotiations for the determination of pay awards. A revised pay and grading structure for senior managers was introduced on 1 April 2013. The aim of the review was to reduce costs whilst ensuring the Council's pay arrangements remained competitive.

Also in 2013, the Council rationalised the terms and conditions for senior managers. Those senior management posts which fall within the Joint National Committee (JNC) Chief Officer definition are employed on JNC terms and conditions and all other senior managers are employed on National Joint Committee (NJC) for Local Government Services terms and conditions with some local variations. The senior management posts which fall within the JNC definition are predominately the Corporate Directors and Directors. This means that the majority of senior managers have terms and conditions which are largely consistent with those for other staff. A number of changes were also made to the JNC for Chief Officer terms and conditions to align them more with the terms and conditions for all other staff. In 2022, the pay structure for Senior managers was further revised to meet the needs of the organisation at this level.

Local Conventions for the GLPC Job Evaluation Scheme

Virtually all local authorities and organisations that use the GLPC Scheme have local conventions in place. A convention is the term given to the local interpretation of the wording of a job evaluation scheme, which are usually written down. Without local conventions, evaluators may interpret the scheme's factor level definitions differently.

This exposes the authority to the potential risk of inconsistency and can lead to inaccurate gradings.

The Council in March 2013 introduced local conventions to ensure that the scheme is applied consistently and fairly to all employees. These have been reviewed and amended in accordance with refreshed guidance notes on the job evaluation scheme issued by the GLPC in 2016.

Pay on Appointment

All employees are normally appointed on the lowest pay spinal column point for their job evaluated grade. Employees may be appointed at a higher point, where they are currently earning more than the lowest pay spine for the role and/or where it is considered that they already possess the skills and experience needed to justify a higher salary within the grade. Appointment at a higher point on the salary scale has to be authorised by the Director or Corporate Director responsible for that service.

The Council delegates authority to the Senior Staff Appointments Sub-Committee to make appointments to the Council of all officers at Director level and above, except for the Chief Executive, in which case a recommendation to appoint is made to Full Council for its final decision to confirm the appointment or not. The starting salary for new appointments to these posts is agreed by the body making the appointment. The starting salary for any other post where the overall remuneration package on new appointment (excluding pension contributions in accordance with the Local Government Pension Scheme regulations) is to exceed £100,000 will normally be agreed by full council or a committee of the Council unless the Chief Executive agrees otherwise.

Annual Pay Progression

Brent's pay policy is primarily based on evaluated pay grades, each having a salary range comprising a number of incremental points. Other pay grades are nationally prescribed and also have incremental progression arrangements. Most employees incrementally progress through the pay grade for their job. Progression will normally be one increment (pay spine column point) on the 1st of April each year until the top of the grade is reached for those on the main pay scales. Separate arrangements

apply during the first year of service where the start date is between 1 October and 31 March and on the anniversary of joining for those on senior manager pay scales.

Performance Related Pay and Bonuses

Council employees including the Chief Executive and directors do not receive performance related payments or bonuses.

National / Regional Pay Agreements

The Council operates the national (JNC/NJC) and regional (GLPC) collective bargaining arrangements for pay and conditions of service for all employees, including senior managers. Pay is increased in line with national and regional pay agreements.

Details of the national pay award for 2025/26 are not yet known. All proposals received from the trade unions will be considered in the context of “fair and affordable” pay rises of the public sector as announced by the Chancellor in the 2021 Spending Review.

Market Supplements

The Council re-introduced a market supplement policy in 2018 and the General Purposes Committee has agreed recruitment and retention allowances for social work staff. Individual service areas do not have discretion to apply market supplements or other recruitment and retention payments and there is a governance structure in place to agree any new supplements based on a sound business case.

Fees for Election Duties

Election fees paid to employees (including chief officers) who assist in elections are in line with the rates agreed by the Government whenever general, regional or European elections occur. Where local elections occur fees will be determined using the cross-London agreed rates.

Pensions

All non-teaching employees are able to join the Local Government Pension Scheme (LGPS). Teachers are able to join the Teachers' Pension Scheme. Benefits for both schemes are paid in accordance with government regulations. National Health Service employees who transferred to the Council under TUPE have access to the NHS Pension Scheme under special provisions agreed as part of the transfer into local government. Employees joining Public Health after the transfer are employed on Council terms and conditions and do have access to the LGPS.

Payments on Termination of Employment

In the event that the Council terminates the employment of an employee on the grounds of redundancy the terms of the Council's redundancy and early retirement arrangements will apply. Termination payments are also subject to any caps or repayment requirements introduced by government legislation. Where practicable, and unless the Chief Executive agrees otherwise, termination payments which exceed £100k will normally be agreed by full council or a committee of the Council. Where a termination payment includes a special severance payment, due regard will be given to Statutory Guidance on the Making and Disclosure of Special Severance Payments by Local Authorities in England.

Re-employment of Employees

Section 7 of the Local Government and Housing Act 1989 requires that every appointment to paid office or employment in a local authority shall be made on merit.

The re-engagement of employees including chief officers who are made redundant is subject to the Council's re-engagement arrangements (contained within the Council's Managing Change Policy). The policy sets out the minimum period a former employee must wait before being eligible to work for the Council again, as well as outlining other restrictions.

Employees who are made redundant may not be re-engaged within twelve months of their termination of employment for reasons of redundancy. After twelve months the employee may be re-engaged via the normal recruitment procedures either to carry out similar work or a different job. Re-engagement is subject to the approval of the relevant Director and the Director with responsibility for HR.

Tax avoidance

All permanent Brent staff including senior managers are paid through payroll which means that all taxes are deducted at source. A review of temporary staff is regularly conducted and it is Brent's policy to cover vacancies through the use of approved agency workers or by appointing staff on fixed term contracts. Temporary workers providing services through their own companies will be carrying out projects and generally not covering permanent roles other than in exceptional circumstances e.g. where interim cover is essential whilst a permanent appointment is recruited. Where these situations do occur they will be limited in duration, usually to less than 6 months.

The Council's approach to dealing with Her Majesty's Revenue and Customs' (HMRC) changes to regulations for provision of personal services from April 2017 and further changes to off-payroll working introduced in April 2021, is to use the HMRC online assessment tool to determine the employment status of individuals for income tax purposes. Most agency workers, consultants and interims are required to pay tax on a PAYE basis, like Council employees.

Publication and access to information

Brent's annual Pay Policy Statement will be published on the website where it can be easily accessed. Information about chief officers' remuneration is published on the Council's website www.brent.gov.uk in the section Senior Managers' pay.

Appendix O: Summary of the HRA Business Plan

1. Introduction

- 1.1 This report sets out the HRA rent setting strategy for 2025/26 and provides an update to the Housing Revenue Account (HRA) Business Plan, along with highlighting the key assumptions required to reflect national policies and financial impacts to the HRA. The business plan projections reflect the income and expenditure required to manage the landlord function and, at the same time, work towards the Council's objectives to increase Council housing supply in Brent.
- 1.2 This report does not attempt to summarise all aspects of the HRA business plan but aims to highlight areas where particular issues should be noted and consider options for future budget strategy.

2. National and local policies that can impact the HRA Business Plan

- 2.1 The HRA self-financing system for Council Housing was implemented in April 2012. Under HRA self-financing, the Council's HRA continues to be a ring-fenced account (income and expenditure) for Council dwellings. HRA self-financing is intended to allow local authority landlords to manage and maintain their own stock from the rental income they generate.
- 2.2 In October 2018, the government announced that the HRA borrowing cap would be lifted, revoking the previous determinations that specified local authorities' limits on indebtedness. This has provided councils with new borrowing powers to increase their housing supply, with a focus on mixed-tenure development including homes for social rent, affordable rent and shared equity products.
- 2.3 The Welfare Reform Act 2012 introduced radical changes to the welfare system, which included a reduction of housing benefits for social tenants if their accommodation is considered larger than required. It also introduced a new universal credit system to be implemented over time, where benefit payments would be made directly to the tenant, rather than the landlord. This change increases the risk of non-collection, which could lead to a rise in rent arrears.
- 2.4 The Welfare Reform Act 2016 imposed a 1% rent reduction a year for 4 years from April 2016 to March 2020. The final financial year of reductions being 2019/20. The resulting loss of rental income for Brent over this period was £23 million when compared to the income that would have been due to the Council if this was not imposed.
- 2.5 It was therefore necessary to make revenue savings within the HRA to compensate for the loss of rental income. A combination of these savings and the use of HRA reserves has helped to achieve a balanced budget during the period of rent reduction, as required by legislation.

- 2.6 In October 2017, the government announced a return to the option of increasing rent by CPI plus 1% for 5 years for all local authorities, starting in April 2020. A return to the CPI plus 1% model had helped to provide some stability and certainty over planned investment in the current stock, service improvements and new developments, at least in the short to medium-term.
- 2.7 Due to exceptional inflation levels and cost of living crisis experienced during 2022/23 financial year, Government implemented a 7% rent rise limitation for 2023/24, compared to 11.1% if CPI plus 1% was applied. This ceiling resulted in an estimated £2m reduction of income when compared to the standard policy of CPI plus 1%. Like most other housing providers, difficult decisions were required to reduce costs in order to close the gap between rental income and increasing cost of service delivery. Brent Housing Management services identified £3m worth of cost reductions during budget setting for 2023/24. There was then a reversion to the standard rent setting arrangements in 2024/25 and the government extended the current CPI plus 1% rent settlement by one year to cover 2025/26.
- 2.8 The approach to be taken by the government beyond 2026 remains uncertain for all local authorities. In the absence of this information, it is assumed in the business plan that rent will remain as CPI plus 1% after 2026.
- 2.9 In the context of the 30-year business plan, whilst a CPI plus 1% model helps to provide some stability and certainty, it does not entirely mitigate other risks which are present in the current economic climate. Factors such as increases in energy and material costs, repair and maintenance contracts and anticipated wage increases, mean that any decision to set rents at less than the maximum permitted, provides a significant risk to the sustainability of the HRA. Local authorities still need to cover the inflationary pressures within the HRA whilst delivering on their operational requirements and strategic priorities, some of which are additional legislative requirements, from repairs and maintenance, to building safety, fire safety and decarbonisation. A rent cap or lower than a CPI plus 1% increase combined with increasing costs results in even greater pressure on the HRA and a likely situation of spend exceeding income generated through rent and service charge collection.
- 2.10 The independent review of building regulations and fire safety, also known as the Hackitt Report, was published in 2018. The report set out over 50 recommendations for the delivery of a robust regulatory system. As a result, in June 2019, the government published the 'Building a Safer Future' consultation detailing proposals to achieve long-term reform of the building safety system. This document sets out the government's proposals for a reformed building safety system covering the performance of all buildings, as well as the management of fire and structural safety risks in new and existing buildings in scope.

- 2.11 A low-rise fire safety programme was developed by Brent Housing Management to address risks in 1,208 converted and purpose built blocks. With regard to highrise blocks, it was decided to go over and above regulatory standards by carrying out Type 4 Fire Risk Assessments across all tower blocks over 12 storeys, the outcome of which found no fundamental issues or safety concerns.
- 2.12 The Building Safety Act 2022 (BSA 2022) introduces fundamental reforms to the law and regulation of building safety, which seek to secure the safety of people in or about buildings and improve the standard of buildings. The scope and impact of the BSA is far-reaching. Its provisions will affect the design, planning, construction, occupation and alteration of future buildings. The Building Safety Regulator will be responsible for all regulatory decisions during the design, construction, occupation and refurbishment of High Rise Buildings (HRBs), which has been defined pursuant to the legislation as buildings over 18 meters or has at least 17 storeys.
- 2.13 The Council Housing Asset Management Strategy (AMS) 2022-2026 sets out a vision for responsive repairs, investment in high rise blocks, reform and improvement of the stock and its performance. The AMS consists of a 5-year budget requirement totalling £104m and spend re-profiling for this has been incorporated into the business plan.
- 2.14 Brent's high-rise blocks that are being retained require significant investment in terms of external fabric, internal works, and mechanical and electrical services. These high-rise blocks built in the 1960's and 1970's require major works if they are to achieve a further lifecycle beyond 40 years. The external walls of most of these blocks are in poor condition. Without refurbishment, these will deteriorate further and beyond the point of affordable refurbishment. The dwellings are generously sized and with refurbishment will continue to offer good accommodation to residents. The mechanical and electrical services are nearing the end of their usable life. Officers plan to undertake the major refurbishment and fire safety measures such as installing sprinklers. The business plan has incorporated £39.4m of investment over five years starting from 2025/26 on tower block refurbishment programme. The blocks are Kilburn Square, Lodge Court, Manor Court, Windmill Court, The Oaks and Watling Gardens (three blocks).
- 2.15 As part of the South Kilburn regeneration programme, the Gloucester House & Durham Court site has been redeveloped to provide 235 new affordable homes to assured social tenants. These have been occupied by Brent's residents in 2021/22. Brent Council owns the freehold and the Council's housing team, together with the Council's energy team, provide the billing for heat to the residents. The associated costs are funded by service charges and through the HRA asset management strategy, in line with other communal heating networks.
- 2.16 In May 2019, the UK government declared a climate change emergency, committing to target net zero carbon emissions by 2050. In July 2019, Brent

declared a local climate and ecological emergency, and has committed to working towards carbon neutrality by the year 2030.

- 2.17 London Councils have included a target of an average EPC Band B rating for London's housing stock by 2030 as part of its joint statement with the London Environment Directors' Network on climate change. Currently, 54% of Brent's Council housing stock has had an energy survey, of which 58% is performing better than the national average of Energy Performance Certificate (EPC) band D. However, 96% falls short of EPC band B. A key feature of the borough-wide climate strategy will be to achieve an average level of EPC band B by retrofitting all housing properties by 2030.
- 2.18 Decarbonisation works to Council homes, including energy efficiency works that reduce demand for heat, is an important part of the AMS. The AMS plays an important role in the delivery of the Brent Climate and Ecological Emergency Strategy. Homes account for 42% of direct carbon emissions in the Borough. The target is to achieve an average EPC band B rating by 2030 for Brent council stock, as it is important that the Council leads by example. Energy efficiency works will be important in helping tenants and leaseholders with the cost of living crisis by helping to reduce fuel costs. Supporting households with the cost of living crisis is a key priority in the Council's Draft Climate Strategy Delivery Plan for 2022-2024.
- 2.19 Whilst major refurbishment work on tower blocks are undertaken, there are opportunities to decarbonise properties to as high a standard as is practicable and achievable targeting at least an EPC B. The five-year Asset Management Plan therefore includes climate emergency works within the tower block programme now rather than having to return in later years with associated disruption and increased costs. The Council has been awarded £1.3m from the Social Housing Decarbonisation Funding grant. This will provide some contribution towards key energy efficiency measures such as external wall insulation, high performance windows, and renewable energy equipment. £580k of the fund has already been drawn down and a further £300k is expected to be drawn down in the financial year.
- 2.20 The Council has a commitment to deliver 5,000 affordable homes in the borough by 2028, of which 1,700 will be delivered directly by the Council. As of December 2024, 879 homes have already been delivered by the Council, with more in the pipeline. The projected capital investment for acquiring and constructing new council homes in 2024/25 is £19.3m and a further £15.5m allocated for 2025/26.
- 2.21 Following the identification of urgent remedial works required to Granville New Homes, Cabinet reviewed the proposed options presented in October 2021. It was agreed to dispose of the blocks at Granville New Homes owned by First Wave Housing (FWH) to the Council's HRA, subject to a consultation with residents. The transfer was finalised on 1 April 2022, which involved the transfer

of 84 social housing and 1 leasehold property, along with associated income and expenditures to maintain the stock. Remediation works are estimated to cost the HRA £15.4m.

3. Rent setting proposal for 2025/26

3.1 The table below shows a snapshot of current average rent levels from occupied properties and the proposed increase of 2.7% for 2025/26. All new re-lets are charged at Formula Rent and new builds are charged at Formula or Affordable Rent that are in line with Greater London Authority (GLA) benchmarks and are adjusted annually in line with rent standards. Updated rent levels are reflected in the current average rent for 2024/25, average rent can change depending on time of reporting. The average proposed rent rate for 2025/26 is £3.93 per week (2.7%) higher than the current financial year.

Tenant Rents for 2025/26

Bed Size	Current average rent 2024/25	Proposed average rent 2025/26 (2.7%)	Rent uplift
	£	£	£
Bedsits	106.31	109.18	2.87
1	127.65	131.09	3.44
2	148.31	152.31	4.00
3	160.74	165.08	4.34
4	176.21	180.97	4.76
5	188.69	193.78	5.09
6	196.00	201.29	5.29
7	242.18	248.72	6.54
Average rent	145.51	149.44	3.93

3.2 A rent increase of 2.7% is estimated to result in additional £1.6m of income when compared to current levels of income. This is due to national inflation increasing by 1.7% compared to last year, which is a reflection of current economic climate.

3.3 For tenants in receipt of housing support to help pay their rent, the cost of rent increase will be met by their housing benefit or the housing element of universal credit, unless the level of support is reduced by factors that may apply to individual circumstances such as benefit cap. Brent Housing Management provide support to tenants who are struggling to pay their rent. The primary objective is to ensure that tenants have all the support that they can get, rather than pursuing an

eviction. Support options include assessing whether the tenant is claiming all the welfare benefits that they are entitled to, assisting them to claim from the Council's resident support fund and arranging a suitable payment plan. Brent Housing Management endeavour to identify vulnerable tenants and maintain contact with tenants in order to ensure that they continue to get the required support to sustain their tenancy.

- 3.4 The net rent amounts exclude service charges. Service charges are a recharge to tenants and leaseholders based on actual costs incurred in providing specific services, such as estate cleaning.
- 3.5 It is recognised that cost of living crisis and increased rental charges can have an adverse impact on the level of rent collections. Approximately 37% of rent charges are covered through housing benefit payments in 2022/23, which is estimated at £19.8m. The remaining 63% of income estimated at £34.1m are paid directly by tenants who are in employment or in receipt of universal credit and would be at risk of non-collection.
- 3.6 Collection rates 2024/25 on average stood at 97%. If this level of rent collection remained consistent for the year, this would result in an additional budget requirement of up to £1.9m in order to allow for risk of non-payments. The Council's Resident Support Fund helps to alleviate some of financial hardship being faced by tenants. However, collection rates are still expected to continue to be impacted. For every 1% drop in collection, the loss of income is estimated at £0.6m. Bad debts have been assumed at 2.1% of rental income per annum over 30 years, this equates to an average £.2m rent loss per annum over the course of the business plan.
- 3.7 Supervision and management costs include allowances for pay inflation uplifts in the business plan. An assumed 2% inflation, similar to current year, is estimated to amount to an additional £0.2m budget requirement in 2025/26. Future pay inflations have also been assumed at 2% in every year after 2025/26, in line with inflation falling back to the Bank of England's inflation target.
- 3.8 Repairs, maintenance and general costs include annual inflationary uplifts. The general cost inflations in the business plan are assumed at 3.2% in year 2, followed by a reduction to 3.1% in year 3 and 4, during forecasted reduction to inflation as per Bank of England Monetary Policy. Following years are assumed to increase gradually to 3% from year 5 onwards in business plan.
- 3.9 Efficiency savings targets are incorporated into the budget setting process and business plan, in line with the Council's overall budget setting process. A 0.5% efficiency target across management and repairs is assumed in the business plan in the first 5 years, followed by 1% per annum over the course of the remaining 25 years, equating to an average saving of £0.3m per annum over 30 years. This

saving target is in addition to the £0.8m cost reduction incorporated into budget setting for current year 2024/25, along with a further savings target of £0.7m for 2025/26.

- 3.10 HRA business plan aims to set aside appropriate funds and incorporate a voluntary debt repayment policy that mirrors the General Fund approach. Calculations involve profiling debt repayments for new builds over 55 years, and debt repayment for major works over 25 years, based on the rate of borrowing for the debt. The repayment modelling commences from debt incurred from 2019/20 onwards, reflecting the period when HRA borrowing exceeded previously set debt cap of £199.3m. In practice, repayments will be possible in years where there is capacity within accumulated operating reserve.
- 3.11 Operating reserve as at 31st March 2024 was £2.4m, and it is not anticipated to be drawn down while rent increases are set at CPI plus 1%. The opening reserve balance had increased by £2m compared to the previous financial year predominately as a result of interest charge in 2023/24 being less than anticipated due to a combination of less than expected borrowing for new builds, a use of alternative funding sources and favourable interest rates received on balances, as well as adjustments made on expected credit losses for rent arrears balances.
- 3.12 The operating reserve is necessary to manage unexpected deficits, or for smoothing in-year budget pressures due to timing differences between the cost of building new homes and receiving rental income, so that it can offset the increased borrowing costs. In addition to the need for the HRA to balance competing demands, such as investing in supply of new homes, the Covid-19 pandemic and inflation has further stressed the importance of maintaining adequate level of reserves. The target operating reserve balance is set at 5% of rental income in the business plan, which is approximately £3m in 2025/26. The operating reserve balance is not projected to reduce below £2.4m, however due to increased cost pressures in the current economic climate, previous rent cap of 7%, along with increased investment to improve high rise blocks, target reserve levels are projected to be achieved from year 6 onwards, at an estimated reserve balance of £3.7m.

4. Summary of key assumptions in the HRA Business Plan

- 4.1 The HRA business plan provides long-term financial forecasts resulting from the implications of the Council's spending, investment and rent-setting decisions, based on the authority's current income, expenditure and investment expectations. The data is combined with key assumptions on how costs and income might change in the future to illustrate what the authority can reasonably expect to happen, using the best available information at the time.

4.2 Regular review of assumptions is important in order to help the Council to make early decisions that help keep the HRA in balance, whilst also delivering substantial levels of investment in Council housing.

4.3 A summary of the key assumptions that underpin the 30 Year Business Plan are presented below:

Description	How it impacts the Business Plan	Assumptions used in the Business Plan
HRA stock movements	Projected rental income is based on stock numbers	Baseline stock numbers in the current year are adjusted for projected RTB sales and new affordable housing supply
Inflation on supplies and services	All income and expenditure is adjusted for inflation to reflect general cost increases. CPI forecast is based on rate in September of previous year.	Rental income uses CPI, all other expenditure is assumed at RPI. CPI 2.4% in year 2, reducing to 2% from year 5 onwards. RPI 3.2% in year 2, reducing gradually to 3% from year 5 onwards.
Minimum Working Balance	Target level of minimum reserve for any overspends	Working balance requirements assumed at 5% of income giving circa £3m
Rental Income	Tenant rent projections are driven by stock numbers and average rent. Tenant rent is the largest source of income for the HRA	Average rent is currently set at £146 per week. Rent is adjusted as per government policy. Assumed CPI+1% for duration of business plan
Supervision and Management Costs	Rental income is allocated to management costs of providing a landlord service	Cost assumed to increase by RPI each year
Service Charges	Cost of specific services are charged back to tenants and leaseholders	Service charge uplift is in line with anticipated cost increases at RPI

Voids	Level of void properties have an impact on rental income that can be charged	Rent loss though voids estimated at 1.7% of rent
Bad Debts	Rent arrears that are not collected results in loss of income	Assumed on average 2.1 of rent
Description	How it impacts the Business Plan	Assumptions used in the Business Plan
Repairs and Maintenance Costs	Rental income is allocated to repairs budgets	Expenditure is adjusted in line with RPI and stock movements
Right to Buy Sales	Stock reductions reduce rental income and set a target for the Council to achieve 1-4-1 replacements	Projected 15 sales per annum
Interest rate on borrowing	Rental income is allocated to financing debt	New debt is assumed at average interest rate of 4.6%.
Capital Programme - Major Works	Investment to maintain housing stock	Profiling over 5 years based on Asset Management Strategy.
HRA Debt Balance	The HRA debt balance as at 31st of March 2024 was £300.9m	Accumulated reserve balances will determine capacity for debt repayments
RTB Receipts	Rolling five year spend targets are set by MHCLG based on RTB sales	It is currently assumed in the business plan that spend targets will be met to achieve 1-4-1 replacement of homes.

Affordable Housing Supply	The Council has committed to providing 1,957 affordable homes by 31 March 2028	As of December 2024, the council has delivered 879 new homes. The projected capital investment for acquiring and constructing new council homes in 2024/25 is £19.3m and a further £15.5m allocated for 2025/26.
Efficiency Savings	Savings contribute towards offsetting budget pressures	0.5% first 5 years then 1% efficiency savings target across revenue costs for management and repairs

5. Sensitivity Analysis

5.1 Alongside the baseline assumptions, sensitivity analysis have been undertaken to explore the impact on reserve balances from a range of assumptions. Considering each of these in turn enables to read the baseline financial projections in the context of potential changes, and so gives an indication of key risks. The key sensitivities analysed are:

- A) Baseline assumptions
- B) RPI cost inflation 0.5% higher in years 2 to 4
- C) Repairs and major works 1.5% higher than inflation in years 2 to 4
- D) Rent freeze imposed from 2025/26 for 4 years
- E) Voids and bad debts 0.5% higher from year 2 onwards
- F) CPI reduction by 0.5% from year 7 onwards

5.2 The sensitivity analysis demonstrates that:

- A) Baseline assumptions avoid deficits over 30 years with a projected reserve balance of £205.5 in year 30, which could potentially be used to reduce debt.
- B) Cost inflation to RPI at 0.5% above baseline assumptions between years 2 to 4, is projected to result in reduction to current reserve balance to manage

budget pressures in the short term. Projected 30-year reserve balance is £175.9m (£29.6m less than baseline).

- C) Repair cost inflations of 1.5% above baseline from year 2 to 4, are projected to reduce existing reserve balances to manage budget pressures in the short term. The reserve balance in year 30 is projected at £169m (£36.2m less than baseline).

- D) A four-year rent freeze from 2025/26 can have a significant impact on the health of the business plan, particularly in the immediate short-term, resulting in projected budget deficit of £17m over 4 years and £117m accumulated deficit over 30 years, making it unviable without significant cost reduction being identified.

- E) Operational performance on void turnaround and income collection rates can have a significant impact on budgets. 0.5% increases to void rent loss (1.6% baseline) and bad debts (2.1% baseline) over the life of the business plan is projected to increase budget pressures over the next 6 years. It is estimated that reserves are likely to be reduced significantly below target levels to balance budgets over this period, leaving HRA at risk of deficit if mitigating cost reductions estimated at £5.9m over next 6 years are not identified.

- F) If average annual CPI was to reduce by 0.5% to 1.5% from year 7 onwards, while inflation on expenditure remained the same as baseline at 3%. The average rental income inflation per annum will be 15% per annum. Reserve balance in year 30 is projected at £49.2m (£1563m below baseline).

6. Risks

- 6.1 The business plan is based on a set of assumptions, and there will always be an element of risk of significant changes in cashflow projections in the revenue and capital accounts, if any of the assumptions fail to materialise.

- 6.2 The main variables that could affect the long-term viability of the Business Plan are rent levels and long-term major works and repairs. There has already been a change to the Council's power to increase rents annually up to a maximum of CPI plus 1%, with an introduced rent rise limitation of 7% in 2023/24. Implications of future Government regulated rent policy remain uncertain beyond April 2026.


- 6.3 Global conflicts, the long-term impact of pandemic, Brexit, high levels of inflation, labour shortages and rising interest rates present the Council with a volatile and uncertain economic environment. The cost of living crisis will impact residents of Brent and the Council is committed to doing what it can to support those in

greatest need. Cost pressures and risk of income collection losses are continuously monitored.

- 6.4 Inflation over the past year has experienced such high levels that have not been seen since the 1980's. Besides rising energy costs, other goods are also experiencing increases in prices, due to factors such as labour shortages, pay rises, logistic issues and a general trend to increase prices and restore profit margins where previously slumps in demand had suppressed price levels.
- 6.5 In September 2024 CPI stood at 1.7% against a Bank of England target of 2%. The September inflation figures are important as they are used for the following years uplift on formula rent levels, 2023/24 being an exception with a 7% ceiling, as opposed to 11.1%. The gap between inflation on rent levels and inflation on costs is a significant risk to the long-term business plan. Inflation rates assumed in the current business plan is informed by projections from Bank of England, which is currently forecasting CPI inflation to return to the 2% target by the end of 2025.
- 6.6 The impacts of Universal Credit and cost of living crisis can affect the HRA Business Plan, as the number of rent arrears may increase considerably. A number of mitigations are in place to help support tenants on universal credit, along with Council Resident Support Fund to help with financial hardship.
- 6.7 As the Council adds more stock to its portfolio and complexities of new additional requirements to building standards are increasing, such as fire safety works and decarbonisation, the cost of major works are rising. At the moment, there is insufficient government subsidy available to address these changes. The Asset Management Strategy and investment plans must be approached cautiously and allow for flexibility to scale back on schemes where required.
- 6.8 Impacts of national housing policies and any changes proposed in future Government papers can have an adverse impact on the HRA and could require additional resources to address any unexpected changes.
- 6.9 Whilst the Council is confident in its ability to continue delivering affordable homes for Brent residents, there are social and economic factors, which are increasingly placing pressure on both current schemes that are on site and those in the Council's pipeline. Brexit, inflation, shortage of labour, materials and global events such as Covid-19 pandemic and wars have had an adverse effect on costs and therefore the financial viability of capital schemes. Developing affordable housing remains challenging within the current market which is resulting in the tenure of schemes being revisited and some pipeline schemes pausing. Though cost of materials have recently stabilised, they remain high. The Council also applies a 10% contingency to each schemes estimated build costs in order to mitigate against inflationary rises when assessing viability.

- 6.10 Significant grant funding is essential to pay for new build schemes. The Council has entered into grant agreements with the Greater London Authority governing the award of such funding to include the requirement to deliver specified numbers of new homes with start on site dates specified. Failure to observe grant conditions or achieve specified delivery numbers may lead to a requirement to repay grant funding and therefore efficient and timely delivery approaches are essential to mitigate the risk.
- 6.11 The HRA debt cap has been removed and significant borrowing is required to invest in stock in order to increase housing supply in Brent. The HRA is exposed to interest rate fluctuations, which can have a significant impact on revenue budgets and the overall business plan. Brent Council operates a one-pool approach to its borrowing, where the HRA receives a proportion of the Council's overall borrowing but with a reduced rate. Having remained at 1% or less since February 2009, base rates began rising in June 2022. The forecast borrowing rate for the HRA is informed by the Bank of England Monetary Policy, with projections for base rates to remain at current rates of 5% until 2024 Q3 and decline gradually to 3.55% by 2029. Interest rates for new borrowing during this period in the business plan have been assumed at an average rate of 4.6%.
- 6.12 Spend targets for 1-4-1 receipts set by Government mean that the Council may need to transfer receipts with compounded interest, if spend targets are not met within 5 years of receiving the receipt. There are currently sufficient schemes in pipeline to be able to utilise receipts towards adding affordable housing in Brent.
- 6.13 There are also demographic changes and a general recognition that there should be better integration of housing, social care and health services. As time goes on, a proportion of the population who are elderly or vulnerable increases and there is an increased need for appropriate housing. However, with limited clarity on the government's funding of supported housing, it is likely that the problem of how to house vulnerable elderly people will intensify.

This page is intentionally left blank

 <p>Brent</p>	<p>Cabinet 10 February 2025</p>
	<p>Report from the Corporate Director, Finance and Resources</p>
	<p>Lead Member – Deputy Leader & Cabinet Member for Finance & Resources (Councillor Mili Patel)</p>
<p>Treasury Management Mid-Year Report 2024-25</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: Economic Commentary</p> <p>Appendix 2: Debt and Investments Portfolio</p> <p>Appendix 3: Average Rate vs Credit Risk</p> <p>Appendix 4: Prudential Indicators</p>
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	<p>Nadeem Akhtar, Senior Finance Analyst Capital, Treasury & Commercial Tel: 020 8937 5957 Email: nadeem.akhtar@brent.gov.uk</p> <p>Sam Masters Head of Finance (Capital, Treasury and Commercial) Capital, Treasury & Commercial Tel: 0208 937 2224 Email: Sam.Masters@brent.gov.uk</p>

1.0 Executive Summary

- 1.1 This report updates Members on Treasury activity for the first half of the financial year 2024/25 (quarters one and two). The Local Government Act 2003 and the Local Authorities (Capital Financing and Accounting) Regulations 2003 require that regular reports be submitted to the relevant Council Committee detailing the Council’s treasury management activities.

1.2 This report updates Members on both the borrowing and investment decisions made by the Corporate Director, Finance and Resources under delegated authority in the context of prevailing economic conditions and considers the Council's Treasury Management performance. The Council can only borrow for capital investment, it cannot borrow to fund operational, day to day expenditure. The borrowing supports the Council's capital investment programmes for both Council Housing (HRA) and General Fund.

1.3 Key emerging points are as follows:

1. The Council has complied with its Prudential Indicators as at quarter two of 2024/25.
2. Borrowing outstanding at 30 September 2024 was £791.9m and had decreased from £814.3m over the course of the financial year, a change of £22.4m. The change in debt was due to the repayment of loans.
3. Cash Investments outstanding at 30 September 2024 was £38.6m and had decreased from £95.3m over the course of the financial year, a change of £56.7m. The change relates to the repayment of maturing debt and ongoing investment in the Council's capital programme in lieu of borrowing.
4. At 30 September 2024 the Council had paid £15.7m in interest payments relating to the Council's loan portfolio.
5. The Council had generated interest income of £3.6m on cash investments as at 30 September 2024. This income in part reflects the current level of Bank of England's Bank Rate. Bank Rate was cut in August 2024 and was reduced from 5.25% to 5.00%.

2.0 Recommendation(s)

That Cabinet:

2.1 Note and comment on the overall financial performance up to quarter two of 2024/25 and note the Council has had complied with the prudential indicators as set by Council in February 2024.

2.2 Approve the submission of the report to Full Council for approval in accordance with the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice.

3.0 Detail

3.1 Cabinet Member Foreword

3.1.1 This report provides detailed reporting on both the borrowing and investment decisions made by the Corporate Director, Finance and Resources for the first

six months of the financial year 2024/25. This includes borrowing raised and repaid during the reported period; cash investment balances and compliance with the Prudential Indicators as set by Full Council on 29th February 2024.

- 3.1.2 The regular reporting of treasury management activities assists Members to scrutinise officer decisions and monitor progress on the implementation of its borrowing and investment strategy as approved by Full Council.
- 3.1.3 The Council's treasury management activity is underpinned by Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice (the CIPFA Code), which requires authorities to produce annually Prudential Indicators and a Treasury Management Strategy Statement on the likely financing and investment activity.

3.2 Background

- 3.2.1 The Council has borrowed money over the long-term period to support investment in the Council's infrastructure and invests cash balances held for short periods. It is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of risk are central to the Council's treasury management strategy.
- 3.2.2 The Council has adopted the CIPFA Code which requires the Council to approve, as a minimum, treasury management semi-annual and annual outturn reports.
- 3.2.3 The 2021 Prudential Code includes a requirement for local authorities to provide a Capital Strategy, a summary document approved by full Council covering capital expenditure and financing, treasury management and non-treasury investments. The Council's Capital Strategy and Treasury Management Strategy, complying with CIPFA's requirement, was approved by full Council at a Budget and Council Tax Setting Council meeting on 29 February 2024.
- 3.2.4 The Council has borrowed and invested substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of risk remains central to the Council's treasury management strategy.

3.3 Economic Background

- 3.3.1 Key points emerging for the first two quarters of 2024/25:
- UK headline consumer price inflation remained around the Bank of England (BoE) target later in the period, falling from an annual rate of 3.2% in March to 2.0% in May and then rebounding marginally to June to 2.2% in July and August, as was expected, due to base effects from energy prices. Core and services price inflation remained higher at 3.6% and

5.6% respectively in August. The UK economy continued to expand over the period. The latest BoE Monetary Policy Report, published in August, showed policymakers expected GDP growth to continue expanding during 2024 before falling back and moderating from 2025 to 2027.

- Bank Rate was reduced from 5.25% to 5.00% during August 2024.
- Sentiment in financial markets continued to mostly improve over the period, but the ongoing trend of bond yield volatility remained.

3.3.2 Appendix 1 provides a full economic commentary for the financial year.

3.4 Balance Sheet Summary

3.4.1 As at 30 September 2024, the Council had a net borrowing position of £753.3m arising from its revenue and capital income and expenditure. The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR), while balance sheet resources are the underlying resources available for investment. These factors are summarised in Table 1 below.

Table 1: Balance Sheet Summary

	31.3.2024 Actual £m	31.3.2025 Forecast £m
General Fund CFR	935.7	1,072.3
HRA CFR	300.9	325.9
Total CFR	1,236.6	1,398.2
PFI & Lease Liabilities	32.5	28.5
Total Loan CFR	1,269.11	1,426.7
External borrowing (Excluding accrued interest)	814.3	909.1
Internal Borrowing (Loans CFR less external borrowing)	422.3	489.2
Less Usable Reserves	(513.3)	(513.3)*
Less Working Capital	(4.3)	4.1**
Investments (or new borrowing)	95.3	20.0

*Assumed to remain static. **Calculated

3.4.2 The treasury management position at 30 September 2024 and the change during the first half of the year is shown in Table 2 below.

Table 2: Balance sheet summary

	1 Apr 2024 Actual £m	Movement	30 Sep 2024 Actual £m
Short-term Borrowing	84.3	(22.4)	61.9
Long-term Borrowing	730.0	0	730.0
Total External Debt	814.3	(22.4)	791.9
Money Market Funds	90.3	(51.7)	38.6
Local Authority Cash Investments	5.0	(5.0)	0.0
Total Cash Investments	95.3	(56.7)	38.6
Net Debt	719.0	34.3	753.3

- 3.4.3 Overall Borrowing has decreased over the first two quarters of 2024/25 as loans were repaid back. Further details are provided in Table 3.
- 3.4.4 Cash investments decreased over the year following the repayment of maturing debt and ongoing investment in the Council's capital programme in lieu of borrowing.
- 3.4.5 Appendix 2 details the debt and investment portfolio as at 30 September 2024.

3.5 Borrowing

- 3.5.1 The Council's main objective when borrowing is to strike an appropriately low risk balance between securing low interest costs and achieving cost certainty over the period for which funds are required, with flexibility to renegotiate loans should the Council's long-term plans change being a secondary objective. The Council's borrowing strategy continues to address the key issue of affordability without compromising the longer-term stability of the debt portfolio.
- 3.5.2 CIPFA's 2021 Prudential Code is clear that local authorities must not borrow to invest primarily for financial return and that it is not prudent for local authorities to make any investment or spending decision that will increase the capital financing requirement and so may lead to new borrowing, unless directly and primarily related to the functions of the Council. PWLB loans are no longer available to local authorities planning to buy investment assets primarily for yield unless these loans are for refinancing or regeneration purposes.
- 3.5.3 The Council has not invested in assets primarily for financial return or that are not primarily related to the functions of the Council. It has no plans to do so in future.
- 3.5.4 Gilt yields were volatile over the 6-month period and have reduced slightly between April and September 2024. Much of the downward pressure from lower inflation figures was counteracted by upward pressure from positive

economic data. Data from the US continues to impact global bond markets including UK gilt yields which PWLB loan rates are priced off.

- 3.5.5 The Council had a borrowing position of £814.3m as at 1 April 2024. This had decreased to £791.9m as at 30 September 2024. Table 3 provides the breakdown of loan balances.

Table 3- breakdown of debt

Loan Type	01-Apr-24	New Loans	Repaid Loans	30-Sept-24
	£m	£m	£m	£m
PWLB	589.8	0.0	(7.4)	582.4
LOBO	59.5	0.0	0.0	59.5
Private Placement	95.0	0.0	0.0	95.0
Local Authority	70.0	10.0	(25.0)	55.0
Total Debt Outstanding	814.3	10.0	(32.4)	791.9

- 3.5.6 The Council had raised £10.0m of new loans in quarter two of 2024/25 and comprised of two short term local authority loans. The loans were required to support the Council's daily cashflow activity as cash balances were close to depletion. This borrowing requirement has been driven by the demands of delivering the capital programme not already funded through grants, contributions, capital receipts or reserves as well as repaying maturing debt. The local authority loans were raised at an average rate of 4.80% with an average duration of 364 days. The interest rates reflect the current rising interest rate environment.
- 3.5.7 As at 30 September 2024 the Council had repaid £32.4m of loans that were held with the PWLB (£7.4m); and local authorities (£25.0m). The PWLB loans consisted of EIP loans whilst the local authority loans were temporary loans held for cashflow purposes.
- 3.5.8 Overall, the total debt movement was a decrease of £22.4m.
- 3.5.9 The PWLB HRA rate, which is 0.4% below the Standard Rate, is available up to June 2025. This discounted rate is to support local authorities borrowing for the Housing Revenue Account and for refinancing existing HRA loans. The Council did not borrow any PWLB loans under the HRA arrangement during the first two quarters of 2024/25 but does intend to take advantage of the HRA rate by 31 March 2025.
- 3.5.10 **Loan Restructuring:** No loans were restructured during the first two quarters of 2024/25. The Council will continue to monitor and evaluate the opportunity to reschedule existing loans as and when opportunities arise.
- 3.5.11 **LOBO Loans:** As at 30 September 2024 the Council was holding £59.5m of LOBO loans. There are no LOBO call reviews in 2024/25 but £35m is expected to be reviewed in 2025/26. Therefore, there is no immediate risk to these loans requiring early repayment or experiencing rate rises in 2024/25. The Council

will keep LOBO loans under review in 2024/25 and consider any premature opportunities that arise to prepay or restructure the LOBOs rather than carrying an ongoing substantial interest risk.

3.5.12 **Forward Borrowing:** As at 30 September 2024 £60.0m of short-term local authority loans have been arranged to start in October and November 2024, with an average rate of 4.8%. The Council’s cashflow forecast has identified a need to borrow cash to support forecasted cashflow activity. The loans were also raised to avoid the capital market liquidity squeeze that is consistently observed in the months January- March, a period when Councils nationally borrow resulting in demand for cash outstripping supply causing short term loan rates to spike.

3.6 Maturity Profile of Debt

3.6.1 The forecast for 31 March 2025 is that the Council will have 68 loans spread over 50 years with the average maturity being 25 years. The maturity profile allows the Council to spread the risk of high interest rates when debt matures in any one year.

Table 4: Debt maturity profile

Maturity Profile at 31 March 2025 (£m)	2024/25
<1 Year	108.7
1-2 Years	23.2
3-5 years	37.5
5-10 Years	72.9
10-15 Years	70.1
15-20 Years	62.0
20-25 Years	91.9
25-30 Years	41.6
30-35 Years	171.0
35-40 Years	6.1
40-45 Years	5.0
45+ Years	100.0
Debt outstanding	800.0

3.6.2 The maturity loan profile includes existing debt and forward starting loans as agreed at 30 September 2024 and excludes any planned future borrowing.

3.7 Interest Rate

3.7.1 For context, the changes in interest rates during the half year were as follows:

Table 5: comparison of interest rates

Interest Rate	31-Mar-24	30-Sep-24
Bank Rate	5.25%	5.00%
1-year PWLB certainty rate, maturity loans	5.36%	4.95%
5-year PWLB certainty rate, maturity loans	4.68%	4.55%
10-year PWLB certainty rate, maturity loans	4.74%	4.79%
20-year PWLB certainty rate, maturity loans	5.18%	5.27%
50-year PWLB certainty rate, maturity loans	5.01%	5.13%

3.8 Capital Financing Requirement

- 3.8.1 The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR). This is the amount of the Capital Programme, past and present, that is funded by borrowing and has not been paid for by revenue or other resources.
- 3.8.2 Assuming that the Council's capital programme is delivered in line with the quarter two forecast, the Council's external borrowing is forecasted to be £909.1m at 31 March 2025 and expected to be within the Prudential Indicator for external borrowing, namely, that borrowing should not exceed the original estimated gross loan CFR for 2024/25 of £1,442.1m. Forecasted loan CFR as at 31 March 2025 is expected to be £1,398.2m. This can be split between the General Fund (£1,072.3m) and the HRA (£325.9m). The difference between the Loan CFR and external loans is internal borrowing. Internal borrowing occurs due to timing differences when capital expenditure that is meant to finance through external debt is instead paid for through cash resources that are intended for other purposes. Cash is replenished at a later date. Internal borrowing at 31 March 2025 is expected to be £489.2m as shown in Table 5.
- 3.8.3 As at 30 September 2024 there were no asset appropriations (land and buildings) between the HRA and the General Fund for the purpose of regeneration and development.
- 3.8.4 The General Fund CFR is forecasted to reduce by £21.4m following the application of Minimum Revenue Provision (MRP) charges and service loan repayments. MRP is discussed further below.

Table 6: Capital Financing Requirement

Capital Financing Requirement (CFR) (£m)	31-Mar-24	31-Mar-25
	Actual	Forecast
General Fund	935.7	1,072.3
Housing Revenue Account	300.9	325.9
Total CFR	1,236.6	1,398.2
Other Debt Liabilities	32.5	28.5
Loan CFR	1,269.1	1,426.7
External Borrowing	814.3	909.1
Internal Borrowing	422.3	489.2
Council Approved Limits (Capital Strategy)		
Approved Operational Boundary Limit	1,500.0	1,500.0
Approved Authorised Limit	1,700.0	1,700.0
Forecasted CFR	1,389.0	1,442.1

3.8.5 The expected movement in the Loan CFR of £161.6m between 31 March 2024 and 31 March 2025 can be explained in Table 6.

Table 7: Movement in CFR

	£m
Opening Loan CFR April 2024	1,236.6
Closing Loan CFR 31 March 2025	1,398.2
Change in Loan CFR	161.6
Capital expenditure 2024/25	293.5
Capital expenditure Financing	(110.4)
MRP	(20.5)
Service Loans Repaid	(0.9)
Total Expected Movement in CFR	161.6

3.9 Minimum Revenue Provision

3.9.1 The Minimum Revenue Provision (MRP) is the charge to revenue made in respect of paying off the principal sum of the borrowing undertaken to finance the capital programme. The statutory guidance provides options for calculating a charge that is considered prudent. The approach for this calculation is approved as part of the budget setting process each February by Full Council in the Minimum Revenue Provision Statement.

3.9.2 The 2024/25 forecasted MRP charge is expected to be £20.5m and consists of £15.5m for capital programme borrowings (historical supported borrowings and unsupported borrowings); and £5.0m for the PFI schemes. A further £0.9m is expected to be received by the Council for service loan repayments. Total MRP

debt repayments that are expected to be charged to the Comprehensive Income & Expenditure Statement will total £21.4m. The Council is not intending to make any voluntary MRP during the year, though this will be kept under review.

3.9.3 MRP will be continued to be kept under review throughout the financial year to ensure that the Council accounts for a prudent charge for the year.

3.10 Cost of Borrowing

3.10.1 Total capital financing costs are forecasted to be £36.0m for the full year. The cost reflects the current relatively high interest rate environment and the need to borrow to fund the Council's ambitious capital programme as well as service existing loans and the impact of a rising Minimum Revenue Provision (MRP) charge, which is a Statutory charge to the Revenue Account for the repayment of debt.

Table 8: Debt costs

Capital Financing Costs at Q2 (£m)	2023/24	2024/25
	Actual	Estimated
Total Gross External Debt Interest	30.3	36.8
Total Interest Payable & Expenses	33.6	39.2
Total Interest Receivable	(24.5)	(27.1)
Net Interest	9.1	12.0
MRP (Excluding PFI)	13.4	15.5
Total Interest & MRP	22.4	27.5
Revenue Contributions to Capital Programme	8.0	8.5
Total Capital Financing Costs	30.4	36.0

3.10.2 The total capital financing cost forecast includes:

- borrowing £179.1m of new loans to fund the Council's capital programme borrowing need as well as to finance maturing debt at an assumed interest rate of 4.8%.
- Interest on treasury cash investments with an average cash balance of £90.0m earning an assumed rate of 4.75%.
- Expected Interest on subsidiary loans related to I4B and First Wave Housing, two wholly owned Council companies are also included in the forecast.

- Service loan interest relates to loan advances to Brent schools, the West London Waste Authority and Alperton Academy are also included in the forecast.

3.10.3 The forecast outturn position of £36.0m is higher than the previous financial year due to a rise in UK Government Gilt rates that subsequently impact PWLB loan rates, thus making borrowing loans from the PWLB (and capital markets) more expensive. The Council's borrowing need has also increased since 2023/24 in line with approved plans to fund the borrowing requirement of the current capital programme. Furthermore, the Council has a rising MRP obligation that is associated with past borrowing decisions. The Council uses the annuity method to determine the MRP charge, which results in a lower charge in the earlier period of the repayment schedule but increases over time.

3.11 Investment Activity

3.11.1 CIPFA published a revised Treasury Management in the Public Services Code of Practice and Cross-Sectoral Guidance Notes on 20th December 2021. These define treasury management investments as investments that arise from the organisation's cash flows or treasury risk management activity that ultimately represents balances that need to be invested until the cash is required for use in the course of business.

3.11.2 The Council holds invested funds, representing income received in advance of expenditure plus balances and reserves. As at 30 September 2024, the Council was holding investment balances of £38.6m and had decreased from £95.3m, a change of £56.7m. The investment position is shown in table 8 below.

Table 9: Treasury investment activity

	31-Mar-24	Movement	30-Sept-24
	£m	£m	£m
Local Authority and DMADF Deposits	5.0	(5.0)	0.0
Money Market Funds	90.3	(51.7)	38.6
Total Cash Investments (Excluding accrued interest)	95.3	(56.7)	38.6

3.11.3 The CIPFA Treasury Management Code requires local authorities to consider their counterparty policies considering environmental, social and governance (ESG) information. The Council has regard to funds who have signed up to ESG related initiatives, including the UN Principles for responsible investment, the UK Stewardship Code and the Net-Zero Asset Managers Initiative.

3.11.4 Both the CIPFA Code and government guidance require the Council to invest its funds prudently, and to have regard to the security and liquidity of its treasury investments before seeking the optimum rate of return, or yield. The Council's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income.

3.11.5 Investment interest rates on short-term cash holdings remain relatively high but lower than a year ago. At 30 September 2024, the Council achieved circa 5.0% from cash investment holdings, which compares to 5.3% a year earlier. Appendix 3 details the average rate earned on investments against credit risk exposure.

3.11.6 Given the higher interest rate environment and the Council’s need to hold cash for day-to-day requirements, deposits have been held in short term investments, providing the Council with improved liquidity. This has also led to increased investment income given the increased deposit rates that followed from changes in the Bank of England Bank Rate since 2022. There was also a focus on holding funds with high credit ratings, providing increased security over the Council’s investment portfolio.

3.11.7 The Council expects to be a long-term borrower and new treasury investments are therefore primarily made to manage day-to-day cash flows using short-term low risk instruments. The existing portfolio of money market funds will be maintained to allow access to cash to fund daily cashflow outgoings.

3.11.8 The progression of risk and return metrics are shown in the extracts from Arlingclose quarterly investment benchmarking in the table 9 below.

Table 9: Investment benchmarking

	Credit Score	Credit Rating	Bail-in Exposure	Weighted Average Maturity (days)	Rate of Return
31.03.2022	5.06	A+	100%	1	0.52%
31.03.2023	5.03	A+	100%	1	4.08%
31.03.2024	4.91	A+	95%	10	5.31%
30.09.2024	4.94	A+	100%	1	5.01%
Similar Local Authorities*	4.70	A+	75%	12	5.33%
All Local Authorities*	4.39	A+	61%	11	5.42%

*Arlingclose clients only

3.12 Non-Treasury Investment Activity

3.12.1 The definition of investments in CIPFA’s revised 2021 Treasury Management Code covers all the financial assets of the Council as well as other non-financial assets which the Council holds primarily for financial return. Investments that do not meet the definition of treasury management investments (i.e., management of surplus cash) are categorised as either for service purposes (made explicitly to further service objectives) and or for commercial purposes (made primarily for financial return). The non-Treasury investments are held to further service objectives and are therefore categorised as for service purposes. The non-Treasury investments are classified under shareholdings to subsidiaries and loans to subsidiaries, detailed in the paragraph below.

3.12.2 Investment Guidance issued by MHCLG, and the Welsh Government also broadens the definition of investments to include all such assets held partially or wholly for financial return.

3.12.3 As at 30 September 2024 the Council held £257.0m of such investments in:

- Shareholding and soft loan investment in subsidiaries: £103.5m (£103.5m in 2023/24).
- Loans to subsidiaries £153.5m (£152.8m in 2023/24).

3.12.4 I4B Holdings Limited is a company wholly owned by Brent Council that was incorporated on 16 December 2016. The primary purpose of the company is to deliver the housing options defined in the Temporary Accommodation reform plan. As of 30 September 2024, the Council had provided total funding of £218.4m to I4B (£218.4m in 2023/24) which are secured against the company's properties. The funding is split between loans and equity financing. Loans outstanding at 30 September 2024 was £182.1m and equity outstanding was £36.4m. The Council is expected to receive £5.3m in interest for loans advanced to I4B by 31 March 2025.

3.12.5 First Wave Housing (FWH) is a registered provider of housing in Brent and is wholly owned by Brent Council. FWH was formally known as Brent Housing Partnership (BHP). The Council is expecting to receive £0.7m in interest by 31 March 2025 for loans to FWH as at the reported date and is expecting to receive capital repayment of £0.4m. As of 30 September 2024, there were outstanding loans to Brent Council totalling £34.3m (£34.3m in 2023/24) which are secured against the properties held within the company.

3.12.6 These investments are expected to generate £6.0m of income for the Council in 2024/25 (£6.0m in 2023/24). This investment income covers the borrowing cost of investing in housing through wholly owned subsidiaries. These borrowing costs would be incurred by the Council regardless of the method through which the Council develops new housing; however, this is the vehicle of choice for such investments.

3.12.7 I4B drew down £3.4m of short-term loans in the quarter two of 2024/25 and is expected to repay by quarter three of 2024/25.

3.13 Treasury Management Training

3.13.5 The needs of the Council's treasury management staff for training in investment and debt management are kept under review. These are considered as part of the staff appraisal process and additionally when the responsibilities of individual members of staff change.

3.13.6 Training for Members is also kept under review. In July 2024 an Introduction to Treasury Management training session was delivered to the Audit & Advisory Standards Committee and wider Members.

3.14 Compliance

3.14.5 The Corporate Director, Finance and Resources reports that all treasury management activities undertaken during the year complied fully with the CIPFA Code of Practice and the Council's approved Treasury Management Strategy.

3.14.6 Compliance with the approved prudential indicators, and in particular the authorised limit and operational boundary for external debt is demonstrated within Appendix 4 (Prudential Indicators) as required by the 2021 CIPFA Treasury Management Code.

4.0 Stakeholder and Ward Member Consultation and Engagement

4.1 Given the nature of this report, there has been no stakeholder and ward member consultation and engagement.

5.0 Financial Considerations

5.1 The financial implications are noted in the report.

6.0 Legal Considerations

6.1 The Local Government Act 2003 and the Local Authorities (Capital Financing and Accounting) Regulations 2003 require the Council to 'have regard to' the Prudential Code and to set Prudential Indicators to ensure that the Council's capital investment plans are affordable, prudent, and sustainable. This requires that regular reports be submitted to the relevant Council Committee. Brent Council has adopted the CIPFA Code of Practice for Treasury Management in the Public Sector and operates its treasury management service in compliance with this code and as such, following consideration by Cabinet, a report setting out the Council's Treasury Management activity for the year should be submitted to Full Council for approval.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

7.1 There are no equity, diversity and inclusion considerations arising from this report.

8.0 Climate Change and Environmental Considerations

8.1 As part of the Council's Treasury Management Strategy, the Council will ensure an assessment is made with regards to environmental, social and governance (ESG) matters for the council's long-term investments. I4B drew down a short-term loan of £3.4m in quarter two of 2024/25.

9.0 Communication Considerations

9.1 No additional communication strategies are required for this report.

Report sign off:

Minesh Patel

Corporate Director, Finance and Resources

This page is intentionally left blank

Appendix 1: Economic Commentary 2024/25 (04/10/2024)

Economic Background

UK headline consumer price inflation remained around the Bank of England (BoE) target later in the period, falling from an annual rate of 3.2% in March to 2.0% in May and then rebounding marginally to June to 2.2% in July and August, as was expected, due to base effects from energy prices. Core and services price inflation remained higher at 3.6% and 5.6% respectively in August.

The UK economy continued to expand over the period, albeit slowing from the 0.7% gain in the first calendar quarter to 0.5% (downwardly revised from 0.6%) in the second. Of the monthly figures, the economy was estimated to have registered no growth in July.

Labour market data was slightly better from a policymaker perspective, showing an easing in the tightness of the job market, with inactivity rates and vacancies declining. However, a degree of uncertainty remains given ongoing issues around the data collected for the labour force survey by the Office for National Statistics. Figures for the three months to July showed the unemployment rate fell to 4.1% (3mth/year) from 4.4% in the previous three-month period while the employment rate rose to 74.8% from 74.3%.

Over the same period average regular earnings (excluding bonuses) was 5.1%, down from 5.4% in the earlier period, and total earnings (including bonuses) was 4.0% (this figure was impacted by one-off payments made to NHS staff and civil servants in June and July 2023). Adjusting for inflation, real regular pay rose by 2.2% in May to July and total pay by 1.1%.

With headline inflation lower, the BoE cut Bank Rate from 5.25% to 5.00% at the August Monetary Policy Committee (MPC) meeting. The decision was finely balanced, voted by a 5-4 majority with four members preferring to hold at 5.25%. At the September MPC meeting, committee members voted 8-1 for no change at 5.00%, with the lone dissenter preferring Bank Rate to be cut again to 4.75%. The meeting minutes and vote suggested a reasonably hawkish tilt to rates, with sticky inflation remaining a concern among policymakers.

The latest BoE Monetary Policy Report, published in August, showed policymakers expected GDP growth to continue expanding during 2024 before falling back and moderating from 2025 to 2027. Unemployment was forecast to stay around 4.5% while inflation was shown picking up in the latter part of 2024 as the previous years' energy price declines fell out of the figures before slipping below the 2% target in 2025 and remaining there until early 2027.

Arlingclose, the authority's treasury adviser, maintained its central view that Bank Rate would steadily fall from the 5.25% peak, with the first cut in August being followed by a series of further cuts, with November 2024 the likely next one, taking Bank Rate down to around 3% by the end of 2025.

The US Federal Reserve (the Fed) also cut interest rates during the period, reducing the Federal Funds Rate by 0.50% to a range of 4.75%-5.00% at its policy meeting in

September. The forecasts released at the same time by the central bank suggested a further 1.00% of easing is expected by the end of the calendar year, followed by the same amount in 2025 and then a final 0.50% of cuts during 2026.

Having first reduced interest rates in June, the European Central Bank (ECB) held steady in July before cutting again in September, reducing its main refinancing rate to 3.65% and its deposit rate to 3.50%. Unlike the Fed, the ECB has not outlined a likely future path of rates, but inflation projections remain in line with the central bank's previous forecasts where it will remain above its 2% target until 2026 on an annual basis.

Financial markets

Sentiment in financial markets continued to mostly improve over the period, but the ongoing trend of bond yield volatility remained. The general upward trend in yields in the early part of the period was reversed in the later part, and yields ended the half-year not too far from where they started. However, the volatility in response to economic, financial and geopolitical issues meant it was a bumpy ride for bond investors during that time.

Over the period, the 10-year UK benchmark gilt yield started at 3.94% and ended at 4.00% but hit a high of 4.41% in May and a low of 3.76% in mid-September. While the 20-year gilt started at 4.40% and ended at 4.51% but hit a high of 4.82% in May and a low of 4.27% in mid-September. The Sterling Overnight Rate (SONIA) averaged 5.12% over the period to 30th September.

Credit review

Arlingclose maintained its advised recommended maximum unsecured duration limit on all banks on its counterparty list at 100 days.

Having had its outlook increased by Fitch and ratings by S&P earlier in the period, Moody's upgraded Transport for London's rating to A2 from A3 in July.

Moody's also placed National Bank of Canada on Rating Watch for a possible upgrade, revising the outlook on Standard Chartered to Positive, the outlook to Negative on Toronto Dominion Bank, and downgrading the rating on Close Brothers to A1 from Aa3.

S&P upgraded the rating on National Bank of Canada to A+ from A, and together with Fitch, the two rating agencies assigned Lancashire County Council with a rating of AA- and A+ respectively.

Credit default swap prices were generally lower at the end of the period compared to the beginning for the vast majority of the names on UK and non-UK lists. Price volatility over the period was also generally more muted compared to previous periods.

Financial market volatility is expected to remain a feature, at least in the near term and, credit default swap levels will be monitored for signs of ongoing credit stress. As

ever, the institutions and durations on the Authority's counterparty list recommended by Arlingclose remain under constant review.

This page is intentionally left blank

Appendix 2

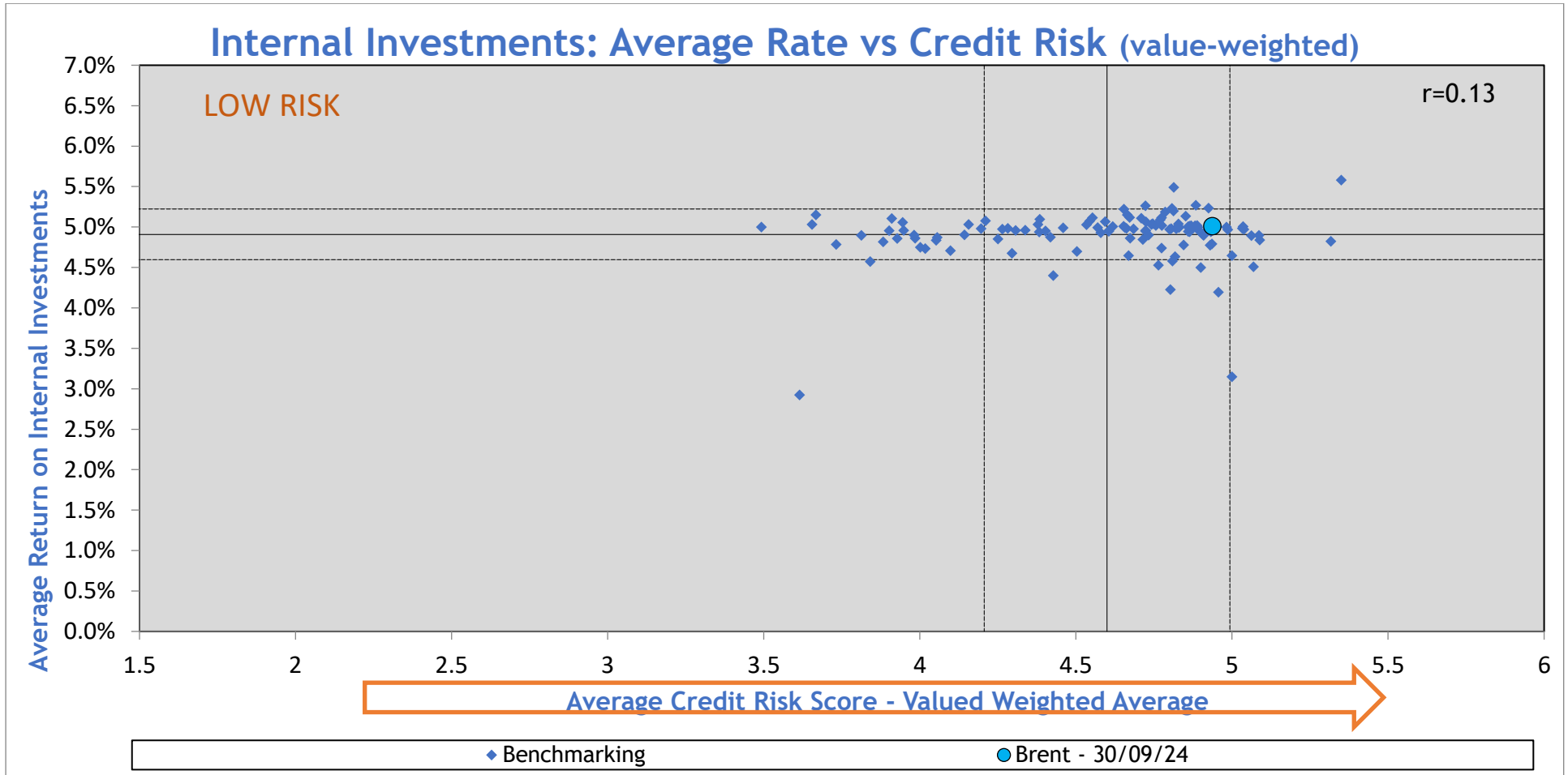
Debt and Investment Portfolio as at 30 September 2024

	Actual Portfolio as at 30 Sept 2024 (£m)	Average Rate as at 30 Sept 2024
External Borrowing:		
PWLB Maturity Loans	378.9	4.01%
PWLB Equal Instalment Principal Loans	203.5	
Fixed Rate Market Loans	95.0	3.22%
LOBO Loans	59.5	
Short-term Loans	55.0	5.73%
Total External Debt	791.9	
Investments:		
Money Market Funds	38.6	5.24%
Total Investments	38.6	
Net Debt	753.3	

This page is intentionally left blank

Appendix 3

Internal Investments: Average Rate vs Credit Risk as at 30/09/2024



The Council measures the financial performance of its treasury management activities against similar Council's through benchmarking provided by its Treasury Management Advisor, Arlingclose limited.

This page is intentionally left blank

Appendix 4 – Prudential Indicators

Legislative Update

In December 2021, CIPFA published its revised Prudential Code and Treasury Management Code of Practice following concerns around the commercial activity undertaken by several local authorities and the affordability of borrowing plans.

The Code required authorities to not borrow to invest primarily for financial return and all capital expenditure undertaken must be related to the functions of the authority. The Council has not undertaken any activities to invest for a yield or have any commercial plans within the capital programme.

The Code required the Prudential Indicators (which are approved as part of the Council's Treasury Management Strategy) to be reported quarterly (from semi-annually) as part of the financial updates and will be a recurring addition to the quarterly financial reports.

Prudential Indicators

The Council has a significant borrowing requirement and balance and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of risk remains central to the Council's treasury management strategy.

Prudential indicators have been calculated using the capital programme data as at quarter two of 2024/25 (August 2024 Forecast) and a forecasted spend as at 31 March 2025.

Capital Expenditure & Financing at Q2 2024/25 (£m)	2023/24	2024/25	2025/26	2026/27	2027/28	Total 2024/25-2027/22
	Actual	Estimated	Estimated	Estimated	Estimated	
Corporate Landlord	10.0	16.2	20.6	14.2	28.2	79.3
Housing GF	99.4	81.9	75.7	30.7	3.6	192.0
Schools	11.7	20.1	16.6	30.0	3.5	70.2
Regeneration	4.5	64.3	73.4	23.1	28.4	189.2
Public Realm	25.1	24.5	11.9	2.3	1.0	39.7
South Kilburn	18.9	33.6	3.9	3.9	0.0	41.4
St Raphael's	0.6	0.5	3.2	3.9	12.5	20.0
HRA	42.8	52.2	96.6	32.7	10.5	192.1
Total Capital Expenditure	213.0	293.5	301.9	140.8	87.8	823.9
Financed By:						
Grants	57.3	46.4	23.5	7.3	3.3	80.4
Section 106	8.9	26.3	16.6	0.0	0.0	42.9
Capital Receipts	4.9	1.8	28.2	23.3	26.1	79.4
Earmarked Reserves	0.9	2.5	0.1	1.4	0.0	3.9
Major Repairs Reserve	10.4	22.9	21.4	0.0	0.0	44.3
Revenue Contributions	9.0	10.6	1.7	7.7	0.5	20.5
Borrowing	121.5	183.1	210.4	101.2	57.9	552.5
Total Capital Financing	213.0	293.5	301.9	140.8	87.8	823.9

(a) Capital Financing Requirement (CFR)

The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement. This is the amount of the Capital Programme that is funded by borrowing. The Council's maximum external borrowing requirement for 2024/25 is shown in the table below. The indicator is set to ensure that the level of proposed capital expenditure remains within sustainable limits and to consider the impact on Council tax and in the case of the HRA, housing rent levels.

CFR Movement at Q2 2024/25 (£m)	2023/24	2024/25	2025/26	2026/27	2027/28
	Actual	Estimated	Estimated	Estimated	Estimated
Opening CFR	1,139.6	1,236.6	1,398.2	1,584.8	1,660.2
Capital Expenditure	213.0	293.5	301.9	140.8	87.8
External Resources	(66.3)	(72.6)	(40.1)	(7.3)	(3.3)
Internal Resources	(25.3)	(37.7)	(51.4)	(32.3)	(26.6)
MRP	(18.1)	(20.5)	(22.8)	(24.7)	(26.8)
Capital Loans Repaid	(0.9)	(0.9)	(1.0)	(1.1)	(1.2)
Accounting Adjustments	(5.5)	0.0	0.0	0.0	0.0
Closing CFR	1,236.6	1,398.2	1,584.8	1,660.2	1,690.0

External resources consist of grants and Developer contributions. Internal resources consist of use of reserves; capital receipts and revenue contributions.

(b) Gross Debt and the Capital Financing Requirement

To ensure that over the medium term, debt will only be for a capital purpose, the Council should ensure that debt does not, except in the short term, exceed the total of capital financing requirement in the preceding year plus the estimates of any additional capital financing requirement for the current and next two financial years. This is a key indicator of prudence. The table below shows that the Council expects to comply with this recommendation during 2024/25.

Gross Debt & the Capital Financing Requirement at Q2 2024/25 (£m)	2023/24	2024/25	2025/26	2026/27	2027/28
	Actual	Estimated	Estimated	Estimated	Estimated
External Loans	814.3	909.1	1,064.7	1,134.6	1,159.5
PFI & Leases	11.4	11.7	11.5	9.6	10.0
Total External Debt Liabilities	825.6	920.8	1,076.2	1,144.2	1,169.5
Internal Borrowing	411.0	477.5	508.7	516.0	520.6
Capital Financing Requirement	1,236.6	1,398.2	1,584.8	1,660.2	1,690.0

(c) Liability Benchmark

The liability benchmark is an important tool to help establish whether the Council is likely to be a long-term borrower or long-term investor in the future, and so shape its strategic focus and decision making. The liability benchmark itself represents an estimate of the cumulative amount of external borrowing the Council must hold to fund

its current capital and revenue plans while keeping treasury investments at the minimum level required to manage day-to-day cash flow.

Liability Benchmark at Q2 2024/25 (£m)	2023/24	2024/25	2025/26	2026/27	2027/28
	Actual	Estimated	Estimated	Estimated	Estimated
Loans CFR	1,236.6	1,398.2	1,584.8	1,660.2	1,690.0
Less Balance Sheet Resources	(470.5)	(470.5)	(470.5)	(470.5)	(470.5)
Net Loan Requirement	766.1	927.8	1,114.4	1,189.7	1,219.6
Plus, Liquidity Allowance	20.0	20.0	20.0	20.0	20.0
Liability Benchmark	786.1	947.8	1,134.4	1,209.7	1,239.6

(d) Authorised limit and Operational Boundary for External Debt

The Operational Boundary for External Debt is based on the Council's estimate of most likely i.e. prudent, but not worst-case scenario for external debt. It links directly to the Council's estimates of capital expenditure, the capital financing requirement and cash flow requirements and is a key management tool for in-year monitoring.

Other long-term liabilities comprise finance leases, Private Finance Initiative contracts and other liabilities that are not borrowing but form part of the Council's debt.

The Authorised Limit for External Debt is the affordable borrowing limit determined in compliance with the Local Government Act 2003. It is the maximum amount of debt that the Council can legally owe. The authorised limit provides headroom over and above the operational boundary for unusual cash movements.

Authorised Limit at Q2 2024/25 (£m)	2023/24	2024/25	2025/26	2026/27	2027/28
Authorised Limit	1,700.0	1,700.0	1,800.0	1,900.0	1,900.0
Operational Boundary	1,500.0	1,500.0	1,600.0	1,700.0	1,700.0

The Corporate Director for Finance and Resources confirms that there were no breaches to the Authorised Limit and the Operational Boundary during Quarter one of 2024/25.

(e) Upper Limits on one-year revenue impact of a 1% movement in interest rates

This indicator is set to control the Council's exposure to interest rate risk. The impact of a change in interest rates is calculated on the assumption that maturing loans in the current year will be replaced at current rates.

Upper Limits on one-year revenue impact of a 1% movement in interest rates on Maturing Debt at Q2 2024/25 (£m)	2024/25	2024/25
	Approved Limit	Actual
Upper limit on one-year revenue impact of a 1% rise in interest rates	5.0	0.8
Compliance with limits:		Yes
Upper limit on one-year revenue impact of a 1% fall in interest rates	5.0	(0.8)
Compliance with limits:		Yes

(f) Maturity Structure of Fixed Rate Borrowing

This indicator is to limit large concentrations of fixed rate debt needing to be replaced at times of uncertainty over interest rates. The Council uses the option date as the maturity date for its LOBO loans. Loans based on existing debt portfolio as at the reported period.

Maturity Structure of Fixed Rate Borrowing at Q2 2024/25	Upper Limit	Lower limit	2024/25	2024/25	2024/25	2024/25	2024/25
			Actual Borrowing	Actual Borrowing	Actual Borrowing 31.03.2025	Actual Borrowing 31.03.2025	Compliance with limits
	%	%	£m	%	£m	%	
Under 12 months	40.0	0.0	59.6	7.5%	48.7	6.7%	Yes
12 months & within 24 months	40.0	0.0	48.7	6.2%	23.2	3.2%	Yes
24 months and within 5 years	40.0	0.0	47.0	5.9%	37.5	5.1%	Yes
5 years and within 10 years	60.0	0.0	73.4	9.3%	72.9	10.0%	Yes
10 years and within 20 years	75.0	0.0	144.3	18.3%	132.1	18.1%	Yes
20 years and within 30 years	75.0	0.0	122.3	15.5%	133.5	18.3%	Yes

30 years and within 40 years	75.0	0.0	189.3	24.0%	177.1	24.3%	Yes
Over 40 years	75.0	0.0	105.0	13.3%	105.0	14.4%	Yes
Total			789.6	100.0%	730.0	100.0%	

(g) Ratio of Financing Costs to Net Revenue Stream

This is an indicator of affordability and highlights the revenue implications of existing and proposed capital expenditure by identifying the proportion of the revenue budget required to meet financing costs, net of investment income.

Financing Costs to Net Revenue Stream at Q2 2024/25	Limit	Forecast	Forecast	Forecast	Forecast
	2024/25	2024/25	2025/26	2026/27	2027/28
Financing Costs (Interest & MRP) (£m)	39.1	27.5	33.3	37.5	39.5
Net Revenue Stream (£m)	383.3	387.0	395.0	407.3	420.1
Proportion of net revenue stream (%)	10.2%	7.1%	8.4%	9.2%	9.4%

Financing costs can be further broken down as follows.

Capital Financing Costs at Q2 (£m)	2023/24	2024/25	2025/26	2026/27	2027/28
	Actual	Estimated	Estimated	Estimated	Estimated
Total Gross External Debt Interest	30.3	36.8	41.6	47.0	49.7
Total Interest Payable & Expenses	33.6	39.2	43.4	48.3	50.9
Total Interest Receivable	(24.5)	(27.1)	(27.8)	(30.7)	(33.0)
Net Interest	9.1	12.0	15.5	17.6	18.0
MRP (Excluding PFI)	13.4	15.5	17.8	19.9	21.5
Total Interest & MRP	22.4	27.5	33.3	37.5	39.5
Revenue Contributions to Capital Programme	8.5	9.0	9.5	4.0	4.0
Revenue Contribution from Service Area (Parking)	(0.5)	(0.5)	(0.5)	(0.5)	(0.5)
Total Capital Financing Costs	30.4	36.0	42.3	41.0	43.0

(h) Upper Limit for Total Principal Sums invested over 364 Days

The purpose of this limit is to contain exposure to the possibility of loss that may arise as a result of the Council having to seek early repayment of the sums invested.

Upper Limit for Total Principal Sums invested over 364 Days at Q2 2024/25 (£m)	2023/24	2023/24	2024/25	2024/25
	Approved	Actual	Approved	Actual
Upper Limit for Total Principal Sums Invested Over 364 Days	50.0	0.0	50.0	0.0

(i) Security

The Council has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit rating of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

Credit Risk Indicator at Q2 2024/25	2023/24	2023/24	2024/25	2024/25
	Approved	Actual	Approved	Actual
Portfolio average credit rating	A	A+	A	A+

(j) Liquidity

The Council has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within a rolling three-month period, without additional borrowing.

Liquidity Risk Indicator at Q2 2024/25 (£m)	2023/24	2023/24	2024/25	2024/25
	Approved	Actual	Approved	Actual
Total cash available within 3 months	20.0	95.3	20.0	55.8

(k) Investment Forecast

This indicator demonstrates the Council's investment exposure broken down by category for Treasury and non-treasury investments. Non-Treasury investments are

directed under the Council's Investment Strategy 2024/25, whilst treasury investments are managed under the Treasury Management Strategy 2024/25.

Total Investment Exposure Indicator at Q2 2024/25 (£m)	2023/24	2024/25	2025/26	2026/27	2027/28
	Actual	Estimated	Estimated	Estimated	Estimated
Treasury management cash investments	95.3	20.0	20.0	20.0	20.0
Service investments: Loans	285.6	284.5	283.3	269.1	267.7
Commercial investments: Property	0.0	0.0	0.0	0.0	0.0
Total Investments	380.9	304.5	303.3	289.1	287.7
Commitments to lend	50.0	50.0	50.0	50.0	50.0
Total Exposure	50.0	50.0	50.0	50.0	50.0

Service investments are further broken down in the table below.

Loans & Investments for service purposes: Category of borrower at Q2 2024/25 (£m)	2023/34	2024/25	2024/25	2025/26	2026/27	2027/28
	Actual	Approved Limit	Estimated	Estimated	Estimated	Estimated
I4B Subsidiary Loans	182.1	400.0	182.1	182.1	182.1	182.1
I4B Subsidiary Equity	36.4		36.4	36.4	36.4	36.4
FWH Subsidiary Loans	34.3		33.8	33.4	32.9	32.5
Local Businesses	0.2	10.0	0.2	0.2	0.2	0.2
Schools, Academies and Colleges	17.9	55.0	17.6	17.4	16.7	16.5
West London Waste Authority	14.8	20.0	14.4	13.9	0.8	0.0
Local Charities	0	10.0	0	0	0	0
Housing Associations	0	50.0	0	0	0	0
Local Residents	0	5.0	0	0	0	0
Total	285.6	550.0	284.5	283.3	269.1	267.7

(I) Investment Funding

This indicator demonstrates the amount of exposure to borrowing as a result of investments made for service purposes. These investments are the loans to the Council's subsidiaries i4B Holdings Ltd and First Wave Housing Ltd.

Investments Funded by Borrowing at Q2 2024/25 (£m)	2023/24	2024/25	2025/26	2026/27	2027/28
	Actual	Estimated	Estimated	Estimated	Estimated
I4B Loans	218.4	218.4	218.4	218.4	218.4
First Wave Housing (FWH)	34.3	33.8	33.4	32.9	32.5
Total Service investments: Loans	252.7	252.3	251.8	251.4	250.9
Total Funded by Borrowing	252.7	252.3	251.8	251.4	250.9

(m) Investment Rate of Return


This indicator demonstrates the rate of return obtained from the different investment categories.

Investments net rate of return at Q2 2024/25	2023/24	2024/25	2025/26	2026/27	2027/28
	Actual	Estimated	Estimated	Estimated	Estimated
Treasury management investments	5.31%	4.75%	3.00%	3.00%	3.00%
Service investments: Loans	2.40%	2.40%	2.40%	2.40%	2.40%
Commercial investments: Property	0	0	0	0	0

(n) Other Investment Indicators

Other investment indicators	2023/24	2024/25	2025/26	2026/27	2027/28
	Actual	Estimated	Estimated	Estimated	Estimated
External Debt (Loans)	814.3	893.9	1,037.6	1,105.1	1,133.1
Net Service Expenditure	358.4	387.0	395.0	407.3	420.1
Debt to net service expenditure ratio	2.3	2.3	2.6	2.7	2.7
Commercial income as a % of net service expenditure ratio	0.0	0.0	0.0	0.0	0.0

This page is intentionally left blank

 <p>Brent</p>	<p>Cabinet 10 February 2025</p>
	<p>Report from the Corporate Director of Children and Young People</p>
	<p>Lead Member – Cabinet for Children Young People and Schools (Councillor Gwen Grahl)</p>
<p>Authority to award contract for the provision of Speech & Language Therapy (SLT) for Children & Young People in Brent and Out of Borough Schools</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 1: Equalities Impact Assessment
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	<p>Shirley Parks Director, Safeguarding, Partnerships and Strategy 020 8937 4529 Shirley.parks@brent.gov.uk</p> <p>Michelle Gwyther, Head of Forward Planning, Performance and Partnerships 020 8937 2499 Michelle.gwyther@brent.gov.uk</p> <p>Roxanna Glennon, Head of Inclusion 020 8937 2785 Roxanna.Glennon@brent.gov.uk</p>

1.0 Executive Summary

- 1.1. The report concerns the procurement of a contract in respect of Speech and Language Therapy (SaLT) for children and young people in Brent schools and out-of-borough schools who have speech and language therapy needs identified in section F of their Brent Education Health Care Plan, to Central London Community Healthcare Trust (CLCH) NHS pursuant to the Provider Selection Regime. This report requests authority to award the contract as

required by Contract Standing Order 88. This report summarises the process undertaken in tendering this contract and the recommendation to whom the contract should be awarded.

2.0 Recommendation(s)

That Cabinet:

- 2.1 Approves the direct award of a contract for the provision of Speech and Language Therapy (SaLT) for children and young people in Brent schools, Additionally Resourced Provision and out-of-borough schools (the “Contract”) following the Provider Selection Regime (PSR) process C for an initial period of three (3) years from 1 April 2025 to 31 March 2028 with an option to extend by a further one (1) year in the sum of £6,569,499 exclusive of VAT to Central London Community Healthcare Trust NHS (CLCH).

3.0 Details

3.1 Cabinet Member Foreword

- 3.1.1 The provision of speech and language therapy support enables Local Authorities to deliver their statutory duties under the Children and Families Act 2014 to meet the educational needs of children and young people as stated in a child or young person’s Education Health and Care Plan (EHCP).
- 3.1.2 The recommendation to direct award this Contract to CLCH will contribute to the Borough Plan Priority for the Best Start in Life by ensuring children and young people have access to appropriate support for a positive journey into adulthood and independence. The recommendation also contributes to the delivery of the priorities identified in the SEND Strategy 2021-25, specifically the commitments to ensure that all children and their families have a range of support and opportunities available to them that support them to realise their aspirations and to be active citizens.
- 3.1.3 The number of children and young people with SEND is increasing in the borough, which is reflected in increasing need for specialist SaLT as set out in this report. A number of strategies are in place to support children and young people with SEND, including a capital programme to provide more local special school places and Additionally Resourced Provisions of over £44m.

3.2 Background

Local Context

- 3.2.1 Brent has 42,593 children and young people of statutory school age and the under 5-year-old population in education settings is 5,603. In Brent 15.7% of pupils have SEND compared to 11.9% in London and 18.0% nationally (4.6% have EHCPs and 11.1% are on SEN Support). In Brent schools, the highest number of pupils with SEN have Speech Language and Communication Needs (31.1%) followed by SEMH (Social, Emotional and Mental Health) (18.0%) and

autism spectrum disorder (16.0%). This data is from the January 2024 school census.

3.2.2 The largest ethnic groups of statutory school age are: Asian Indian (18.8%), Any Other White Background (15.6%), Any Other Ethnic Group (14.4%), Black African (11.4%) and White British (9.4%). A very high proportion of pupils have English as an Additional Language (65.0%). The largest spoken first languages other than English are: Arabic (9.9%), Gujarati (8.9%), Somali (5.0%), Romanian (4.9%) and Urdu (2.7%).

3.2.3 The Council entered into a contract with CLCH on 1 April 2019 for SaLT for pupils with a Brent EHCP in mainstream schools in Brent and out-of-borough and support for the Speech and Language Communication needs of children and families accessing Family Wellbeing Centres/Early Years settings. The contract was entered into for a period of 2 years, with an option to extend for a further 3 years. The Council exercised the option to extend the contract for a further one year and the contract is due to expire on 31 March 2025. Officers are therefore seeking to put in place contractual arrangements to ensure a continuation of service when the existing contract expires.

3.2.4 The Provider Selection Regime (“PSR”) came into effect on 1st January 2024. The PSR introduced new regulations governing the procurement of health care contracts which support the move from commissioning to the new collaborative arrangements, including the creation of Integrated Health Systems, under the Health and Care Act 2022. Officers are recommending awarding the Contract following the Provider Selection Regime (PSR) process C to CLCH (the existing provider) for an initial period of three years (3) with the option to extend by a further 12 months (1 year) for a total contract value of £6,569,499 (exclusive of VAT) for the following reasons:

- The current contract for the provision of speech language therapy expires on 31 March 2025.
- The provision of SaLT is statutory and therefore the provisions of the Contract will help the Council to comply with its statutory duties for needs specified in Section F of a child’s education Health Care Plan (EHCP).
- The Central London Community Healthcare NHS Trust (the ‘CLCH’) has developed positive working relationship with schools and the local authority and the award of this Contract will support continuation of quality services that are in the best interests of children and young people.
- There is added value in this service being delivered by CLCH as it allows the service to be aligned with their delivery of Brent’s community Speech and Language Therapy services commissioned by Northwest London ICB. The extension would maintain strategic alignment of services. This will ensure that children and young people and families have access to a seamless service.

3.2.5 At the end of Quarter 2 2023/24 (September 2024), the existing contract with CLCH supported 765 children and young people with SLCN on their EHCP, an increase of 7.9% from the same quarter the previous year. In addition, there are

children who are not covered by the current Contract receiving SaLT through spot purchase arrangements (72 as at October 2024).

New Model

3.2.6 Officers have been working with system partners to review the delivery model in Brent. A joint agreed statement was developed by the working group for the new model which states:

- Local Authority Children's Services (Public Health and Education) and the Health Integrated Commissioning Partnership (ICP) work together to ensure all children and young people communicate to the best of their ability so that they thrive through childhood and into adult life. These partners, alongside parent carers, build on the strengths of the linguistic and cultural diversity of Brent to create and foster opportunities for good development.
- The focus of our approach is based on the principle that children and young people's communication skills are best developed through interaction with those who are most familiar to them in everyday situations, both at home and in education settings. We aim to achieve this by ensuring a whole system approach - providing training and guidance to parents and a wide range of professionals (from maternity services to health visiting to nurseries and schools) who can then support children and young people in their everyday, functional interactions with peers and adults. For those children and young people who need it, therapeutic assessment, intervention and support will be available at a targeted and specialist level.
- This approach will contribute to improved outcomes, educational attainment and emotional health and wellbeing for Brent children and young people. It will also ensure that we nurture highly skilled staff, ensuring a workforce that is confident and responsive to individual communication profiles.

3.2.7 The purpose of the new model is:

- To build on existing provision across the continuum of need, from universal to specialist.
- To clarify needs at each level of provision and set out which agency/LA department is responsible for funding/delivering that element of provision.
- To meet previous gaps in service delivery.

The table below shows the developed model:

1	Universal	The focus is on early intervention and is available to all. It empowers parents and staff to facilitate support for all children and particularly those at risk of developing speech language and communication needs (SLCN).
2	Targeted 1 Max 40% of children will be between universal, targeted 1 and targeted 2 levels	<p>This level is linked to the graduated approach and is mainly setting/school-led, i.e. it is delivered universally or almost universally, and therefore not necessarily focused on the needs of individual children.</p> <p>Interventions include those which have been established with the help of the Speech and Language/or Assistant (SaLT/Assistant) but become self-sustaining within settings.</p>
3	Targeted 2	T2 interventions would include those that require the direct involvement of SaLT for assessment and monitoring, but which can be delivered by staff and/or parents, with relevant training provided.
4	Specialist Max. 10% of children at this level	This level supports those children who have a defined clinical need and where the therapist's expertise, together with the parents and/or key workers, will make a significant contribution.

Proposed New Speech, and Language Therapy Contract

3.2.8 The contract will deliver:

- An equitable and inclusive SaLT service to children and young people aged from 0 to 25 years with an EHCP where SaLT has been identified as a need in Section F within mainstream schools and Additionally Resourced provision (both in and out borough) and, where applicable, young people attend further educational facilities including colleges.
- The provision of SaLT to Brent children and young people in out-of-borough mainstream schools and FE colleges within a 12 miles radius of Brent Civic Centre.
- The contract will deliver SaLT as identified in Section F of EHCPs, review the level therapy provision and contribute to the statutory annual review. Where stated as part of an EHCP, the provider will also deliver training to staff in schools to support implementation of the SaLT programme.
- Young people known to the Youth Justice Service will have access to SaLT where that is stated in Section F of their Plan.

3.2.9 Taking a baseline of 1035 CYP with SaLT needs as of 1st April 2025 and building in a 7% growth in subsequent years, the expected number of CYP to be supported each year of the contract is:

Contract Year	Current CAP	In contract year growth, spot arrangement and ARPs: Baseline @Oct 2024	% increase from current CAP
24/25	770	1035	34%
New Contract Years	Number of CYP	plus Annual growth	Expected Number of CYP supported in each contract year
Year 1	1035	0%	1035
Year 2	1035	+7%	1108
Year 3	1108	+7%	1186
Year 4	1186	+7%	1269

3.2.10 Officers are recommending a direct award of the Contract under the Provider Selection Regime for the provision of SaLT with CLCH for a period of 3 years from 1 April 2025 – 31 March 2028, with an option to extend by 12 months (1 year) for a total contract value of £6,569,499 exclusive of VAT. The Contract will provide SaLT for 1035 children and young people in 2025/2026 with the number of children and young people supported increasing by 7% each Contract year.

3.2.11 The Contract procurement has been managed under the Provider Selection Regime (PSR) which was to be introduced under the Health and Care Act 2022. The PSR governs the procurement of health care services in England by bodies including NHS England, ICBs, NHS Trusts and local authorities. The provision of SaLT is therefore in scope. The PSR removes the requirement to competitively tender and provides an alternative framework to allow collaboration leading to contract award.

4.0 Award Considerations

4.1 The Council, as a relevant authority under the Health Care Services (Provider Selection Regime) Regulations 2023 ('PSR'), must follow the appropriate procurement process as determined by the PSR when procuring relevant health care services.

4.2 The PSR mandate allows the following processes: a) direct award process — which is subdivided into three forms of direct award (A, B, and C); b) the most suitable provider process and c) a competitive process.

4.3 Officers have identified direct award process C as the most suitable process to procure the Contract for Speech and Language Therapy for children and young people in Brent with an EHCP and have addressed its requirement as follows:

Ref.	Requirement	Response
(i)	Description of the relevant health care services to which the contract relates, including the most relevant CPV (Common	85100000-0 - Health services

Ref.	Requirement	Response	
	Procurement Vocabulary) code(s) – PSR Schedule 1		
(ii)	Are you also procuring other goods or services along with the relevant health services as described above (mixed procurement)?	No	
(iii)	The value.	£6,569,499 exclusive of VAT	
(iv)	The contract term.	Initial period of three (3) years from 1 April 2025 to 31 March 2028 with an option to extend by a further 12 months (1 year)	
(v)	The procurement process adopted.	Provider Selection Regime Route C Direct Award.	
vi	Are you required to use direct award processes: A (one capable supplier) or B (patient choice) under the PSR?	No	
vii	Did you consider the Most Suitable Provider or Competitive Processes? Why neither of those processes have been recommended for this procurement?	Officers are satisfied that the existing provider is meeting the current contractual arrangement. Officers believes the existing provider will continue to meet the requirements of the new contract and therefore did not seek a competitive process.	
viii	Are the proposed contract arrangements changing considerably from the existing contract?	No, Officers have determined the considerable change threshold has not been met. The changes in the relevant care services to which the proposed contracting arrangements related (compared with the existing contracts) are attributable to a decision of the Council; however, the decision had to be made due to external factors as a result of higher volume of service user volumes which is beyond the control of the relevant authority or the provider. The proposed contracting arrangements are not materially different in character to the existing contract when that existing contract was entered into.	
ix	Is the existing provider (CLCH) satisfying the existing contract to a sufficient standard and is likely to be able to satisfy the new contract to a sufficient standard?	Yes, see (xi)	
x	The procurement timetable.	Stage in Procurement	Indicative dates
		Publication of notice of intention to make an award to existing provider	18/02/2025
		Standstill period of at least 8 working days	19/02/2025 - 27/02/2025
		Confirmation of award	28/02/2025

Ref.	Requirement	Response	
		Contract start date	01/04/2025
(xi)	The evaluation criteria and process.	<p>Key criteria as follows:</p> <p>Quality and innovation 30%</p> <ul style="list-style-type: none"> • Provider will be able to satisfy the new contract to a sufficient standard. • The service should support the Local Authority to fulfil its statutory duties through the delivery of the services within this contract. • Resources are to be recruited to meet the projected increase and growth annually. <p>Value 30%</p> <ul style="list-style-type: none"> • Provider will be able to satisfy the new contract to a sufficient standard. • The provider actively engages in reviewing gaps in provision with key partners and is working to understand how resource can support the new model of delivery. <p>Integration, collaboration and service sustainability 25%</p> <ul style="list-style-type: none"> • Provider will be able to satisfy the new contract to a sufficient standard. • The service is currently meeting the Borough based plan, and the new service specification and contract outlines opportunities for the provider to do this again. For example, CLCH sits on the steering group for the Start for Life programme. <p>Improving access, reducing health inequalities and facilitating choice 5%</p> <ul style="list-style-type: none"> • Provider will be able to satisfy the new contract to a sufficient standard. • The new specification outlines an equitable and inclusive Speech and Language Therapy Service to children and young people aged from 0 to 25 years with an Education Health Care Plan, where SaLT has been identified as a need in Section F, within linked early years settings, mainstream schools and ARPs (both in and out borough) and, where applicable, some young people attending further educational facilities including colleges. • The service delivers training to staff in schools to support implementation of the programme. <p>Social value 10%</p> <p>While there is no specific commitment to the Council's Social Value and Ethical Procurement policy, the provider is actively engaged in reviewing gaps in provision with key partners within the wider system and is working to understand how resource can support the new model of delivery. This supports improvements in the cohort's life chances to realise their aspirations by ensuring early intervention at all ages and support for children, young people and families.</p>	
xii	Information as to how any conflicts or potential	No conflicts of interest were declared.	

Ref.	Requirement	Response
	conflicts of interest have been managed	
xiii	Procurement Principles - briefly explain how this procurement has been made with a view to: <ul style="list-style-type: none"> ◦secure the needs of the people who use the services ◦improve the quality of the services, and ◦improve efficiency in the provision of the services And carried out transparently, fairly and proportionately	<p>Under the Children and Families Act 2014, local authorities have a responsibility to meet the educational needs of children and young people as stated in a child or young person's Education Health and Care Plan (EHCP).</p> <p>A working group was set up to review the provision of Speech Language Communication Needs and Occupational Therapy in Brent resulting in the development of a new Model and a joint statement agreed which ensures all children and young people communicate to the best of their ability so that they thrive through childhood and into adult life.</p> <p>These partners, alongside parent carers, build on the strengths of the linguistic and cultural diversity of Brent to create and foster opportunities for good development. The service will therefore provide a smooth transition for the CYP as they get older and become an adult.</p> <p>The Council have undertaken a thorough assessment of the provider's capabilities against the key criteria and have determined a competitive procurement exercise was not required because the provider is likely to satisfy the original contract and will likely satisfy the proposed contract to a sufficient standard.</p>
(xiv)	Any business risks associated with entering the contract.	No specific business risks are considered to be associated with entering into the Contract.
(xv)	The Council's Best Value duties.	It is considered that by adopting the procedure detailed in Section (v) above, award will result in the Council achieving best value.
(xvi)	Consideration of Public Services (Social Value) Act 2012	<p>The outcome of the Contract is designed to benefit those living in Brent.</p> <p>Social Value is a requirement of the Contract.</p>
(xvii)	Any staffing implications, including TUPE and pensions.	There are no implications for Council staff arising from the procurement.
(xviii)	The relevant financial, legal and other considerations.	Financial – See Financial Considerations section 6 below.
		Legal – See Legal Considerations section 7 below.
		Other – N/A
(xix)	Sustainability	Given the nature and value of the Contract, it is not possible to include specific sustainability requirements.
(xx)	Key Performance Indicators / Outcomes	Appropriate Key Performance Indicators / Outcomes will be included in the Contract.
(xxi)	London Living Wage	The Contract will require the payment of the London Living Wage.

Ref.	Requirement	Response
(xxii)	Contract Management	A contract manager will be appointed, and appropriate contract management provisions will be included in the Contract.

5.0 Stakeholder and ward member consultation and engagement

5.1 Consultation has taken place with a range of internal and external stakeholders to inform future delivery. Parent and carers, schools and early years' settings were consulted at the start of the review (October 2023). A meeting was held with Parent Carer Forum to discuss the proposed changes in November 2023. A series of workshops were held in Spring 2024 with services across Children and Young People Directorate, delivery partners, Public Health and NWL ICP/ICB. Respondents were overall positive about improving access to therapies. Updates on the progress of the review have been taken to Schools Forum.

6.0 Financial Considerations

6.1 The current SaLT contract is funded from the High Needs Block of the Dedicated Schools Grant with an annual budget allocation of £1.11m and £0.14m allocated for spot purchases, totalling £1.25m.

6.2 As a demand led service, incorporating spot purchases into the overall contract would mitigate the risk of exceeding the available budget for the service.

6.3 The total available budget over four years, starting from April 2025 is £5.46m. This includes funding for spot purchases and a projected 7% annual growth from 2026/27. This amount aligns with the current forecast spend of £1.25m for the current financial year (excluding provision for children and young people in ARPs).

6.4 The proposed contract cost of £6.57m would create £1.1m budget pressure over the 4 years. This pressure includes the extension of the contract to provide services for children and young people in ARPs, with an estimated cost of £0.717m over this period. The £1.1m pressure will be addressed through a review of services funded by the High Needs Block of the DSG and a subsequent realignment of funding to ensure the High Needs Block budget remains balanced.

7.0 Legal Considerations

7.1 Officers are recommending the award of the Contract to the existing provider CLCH without competition by following the Provider Selection Regime's direct award process C which was introduced by the Health Care Services (Provider Selection Regime) Regulations 2023 ('PSR') which came into force on 1 January 2024, and that replaced the Public Contracts Regulations 2015 for

defined health care services; and National Health Service (Procurement, Patient Choice and Competition) Regulations 2013.

- 7.2 The Council as a defined Relevant Authority under the PSR, is required to apply the PSR for the purposes of procuring relevant health care services. Relevant health services are a statutory defined term under the regulations (Schedule 1). Officers in the table at section 4 have identified the Speech and Language Therapy (SaLT) for children and young people in Brent schools as relevant health care services subject to the PSR.
- 7.3 Unlike the Public Contracts Regulations 2015, the PSR regime has no minimum financial threshold for its application. However, it mandates the Council to follow one of the processes under the PSR and comply with the procurement principles which require the Council to make decisions in the best interests of the services' users.
- 7.4 Officers have identified direct award process C as the most appropriate process to award a contract to the incumbent provider on the basis that the Council is not required to follow direct award processes A or B, the term of the current contract is due to expire 31 March 2025, and Officers propose the new Contract to replace it. In the table at section 4, above, Officers have explained that the "considerable change" threshold is not met and that after applying key criteria and basic selection criteria their view is that the existing provider is satisfying the existing contract and will likely satisfy the proposed Contract to a sufficient standard.
- 7.5 Furthermore, Officers have also explained the steps taken in order to procure the Contract ensures compliance with the procurement principles and therefore, are now seeking authority to award the Contract to CLCH so a notice of intention to make an award to the existing provider can be published in Find a Tender containing the information set out in Schedule 3 of the PSR.
- 7.6 A contract procured using the direct award process C must not be entered before the end of the standstill period. The standstill period begins the day after the notice of intention to make award is published on Find a Tender and it must last for a minimum of eight working days. The standstill period is to give a service provider who is either aggrieved or believes that PSR have not been complied with, the opportunity to make written representations to the Council particularising concerns before the contract is formalised. Such representations should be received before midnight on the eighth working day after the standstill period begins. Following the end of the standstill period, and providing that no written representations are made during the standstill period the relevant authority can enter into the contract.
- 7.7 Contract Standing Order 86f (iv) states that subject to complying with any relevant parts of Procurement Legislation, Tenders need not be invited, nor quotations sought for contracts for health care services procured in compliance with the Provider Selection Regime PROVIDED that advice is sought from the Corporate Director of Law and Governance and Head of Procurement.

- 7.8 The award is subject to the Council's own Standing Orders and Financial Regulations in respect of High Value Contracts given the procurement is valued at more than £5 million. Part 3 of the Council's Constitution state that contracts for services exceeding £5 million shall be referred to the Cabinet for approval of the award of the contract.
- 7.9 As the decision being sought here is a Key Decision, it may not be taken by Cabinet unless this matter has been published on the Forward Plan. The Key Decision must be published on the Forward Plan (Paragraph 30 of the Access to information rules) and must be included on the Forward Plan not less than 28 days before the decision is to be made. (Paragraph 34 of the Access to Information Rules). The decision to award has been placed on the Forward Plan for the requisite 28 days. The decision is subject to the Council's 5 clear day call-in period and may not be implemented until after expiry of the call-in period provided that no call in has been made.
- 7.10 There are no TUPE implications as the Contract is being awarded to the same provider who is delivering the current services and there will be no Council staff impacted by this decision.

8.0 Equity, Diversity & Inclusion (EDI) Considerations

- 8.1 Pursuant to s149 Equality Act 2010 (the "Public Sector Equality Duty"), the Council must, in the exercise of its functions, have due regard to the need to:
- (a) eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act
 - (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.
- 8.2 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.
- 8.3 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.
- 8.4 There is no prescribed manner in which the council must exercise its public sector equality duty but having an adequate evidence base for its decision is necessary.

8.5 Cabinet is referred to the contents of this report for information, in particular the Equality Analysis at Appendix 1

9.0 Climate Change and Environmental Considerations

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

10.0 Human Resources/Property Considerations (if appropriate)

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

11.0 Communication Considerations

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

Report sign off:

Nigel Chapman

Corporate Director, Children and Young People

This page is intentionally left blank

Appendix 1 - Equalities Impact Assessment

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Provision of Speech Language Therapy
DEPARTMENT:	Children and Young People
TEAM:	Commissioning and Resources, Forward Planning, Performance and Partnerships Service
LEAD OFFICER:	
DATE:	22/10/2024

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.

This EIA is in relation to the commissioning of a contract for provision of Speech & Language Therapy (SLT) for children and young people in Brent schools, ARPs and out-of-borough schools within a 12-mile radius (of Brent Civic Centre) and who have an Education Health Care Plan with SLT needs identified in section F of the plan.

Section 26 of the Children and Families Act 2014 places a duty on local authorities to implement joint commissioning arrangements with health partners for the education, health and care of children and young people with SEND. The following therapy services are currently commissioned:

- Under the Children and Families Act 2014, local authorities have a responsibility to meet the educational needs of children and young people as stated in a child or young person's Education Health and Care Plan (EHCP). The LA commissions services for children where Speech and Language Therapy (SaLT) is identified as an educational need in their EHCP.

National Context

Paediatric Speech and Language Therapists provide life-improving treatment, support and care for children and young people who have difficulties with communication, eating, drinking or swallowing. This will include premature babies and infants with conditions such as cerebral palsy, cleft palate and Down syndrome who, from very early in life, have difficulties with drinking, swallowing and early play and communication skills. They also support children and young people with primary speech, language and communication difficulties, such as stammering, as well as speech, language and communication difficulties that are secondary to other conditions such as learning difficulties and hearing problems. Speech and Language Therapists assess and treat speech, language and communication problems to help them communicate better. They also assess, treat and develop personalised plans to support people who have eating and swallowing problems. Using specialist skills, Speech and Language Therapists work directly with children and young people and their families and provide them with tailored support. They also work closely with teachers and other health

professionals, such as doctors, nurses, other allied health professionals and psychologists to develop individual treatment programmes.

In relation to the early years, appropriately qualified speech and language therapists/assistants have a particular role in helping parents, staff and volunteers and staff that work with babies and very young children apply evidence-based approaches to early identification and developing children's speech, language and communication skills. Children and families should receive skilled, evidence-based care that is based on the relevant national guidance, and underpinned by professional standards including the practice care standards set by the Royal College of Speech and Language Therapists.

Local Context

Brent is one of the most culturally diverse areas in England. The dynamic mix of communities continues to enrich and inform the social, economic, and cultural make-up of the borough.

Brent has 42,593 children and young people of statutory school age and the under 5-year-old population in education settings is 5,603. In Brent 15.7% of pupils have SEND compared to 11.9% in London and 18.0% nationally (4.6% have EHCPs and 11.1% are on SEN Support). In Brent schools, the highest number of pupils with SEN have Speech Language and Communication Needs (31.1%) followed by SEMH (Social, Emotional and Mental Health) (18.0%) and autism spectrum disorder (16.0%). This data is from the January 2024 school census.

The largest ethnic groups of statutory school age are: Asian Indian (18.8%), Any Other White Background (15.6%), Any Other Ethnic Group (14.4%), Black African (11.4%) and White British (9.4%). A very high proportion of pupils have English as an Additional Language (65.0%). The largest spoken first languages other than English are: Arabic (9.9%), Gujarati (8.9%), Somali (5.0%), Romanian (4.9%) and Urdu (2.7%).

At the end of Quarter 2 2023/24 (September 2024), the existing contract with Central London Community Health Trust supported 765 CYP with SLCN on their EHCP, an increase of 7.9% from the same quarter the previous year. In addition, there are children who are not covered by the current Contract receiving SaLT through spot purchase arrangements (72 as at October 2024).

The service will cover 62 Brent primary schools, 16 Brent secondary schools, Further Education in Brent and pupil referral unit provision.

Delivery of speech and language therapy

Through the commissioning of this service, the council can ensure that:

1. Service delivery adheres to all aspects of the SEND Code of Practice 2015 (updated October 2020).
2. The priorities identified in the SEND strategy 2021 – 2025 are supported:
 - Education, employment and training
 - To live a healthy lifestyle
 - To be fully active citizens of Brent.
 - To live independently
 - My Brent - The voice of young people to be heard in shaping the Brent of the future.
3. Its statutory responsibility to provide the level of care specified in Section F of a child's EHC Plan with regards to speech and language therapy is met
4. There is delivery of an equitable service across all Key Stages considering the needs of children and young people requiring the service.

The service is expected to achieve the following outcomes:

- An improvement in the educational attainment and ability to participate in the curriculum of children and young people with occupational therapy needs listed in Section F of their EHC Plan.
- Children and young people who are aware of and, where possible, able to independently use strategies to support their therapeutic difficulties in everyday situations.
- Children and families receiving a seamless service when transferring between primary, secondary and independent providers of occupational therapy, and are aware of the on-going support available.

The Service is also expected to contribute towards achieving the following outcomes:

- The rate of improvement in under-achieving groups is accelerated
- All children and young people with SEND are able to access the same wide educational opportunities and life chances as others.

The new Brent Delivery Model for SLT

In developing the new service specification, key stakeholders across health and the local authority (including public health) came together to develop a new delivery model to ensure maximum impact of therapists. An SLCN statement was also drawn up that sets out the intentions for the new model. The statement for SLCN is:

Local Authority Children's Services (Public Health and Education) and the Health Integrated Commissioning Board (ICB) work together to ensure all children and young people communicate to the best of their ability so that they thrive through childhood and into adult life. These partners, alongside parent carers, build on the strengths of the linguistic and cultural diversity of Brent to create and foster opportunities for good development.

The focus of our approach is based on the principle that children and young people's communication skills are best developed through interaction with those who are most familiar to them in everyday situations, both at home and in education settings. We aim to achieve this by ensuring a whole system approach - providing training and guidance to parents and a wide range of professionals (from maternity services to health visiting to nurseries and schools) who can then support children and young people in their everyday, functional interactions with peers and adults. For those children and young people who need it, therapeutic assessment, intervention and support will be available at a targeted and specialist level.

This approach will contribute to improved outcomes, educational attainment and emotional health and wellbeing for Brent children and young people. It will also ensure that we nurture highly skilled staff, ensuring a workforce that is confident and responsive to individual communication profiles.

The new model sets out four levels of support. All levels are time limited before review and an expectation that children move up or down a level.

Level		Description of provision
1	Universal	The focus is on early intervention and is available to all. It empowers parents and staff to facilitate support for all children and particularly those at risk of developing occupational therapy needs.
2	Targeted 1	Linked to graduated approach and is setting-/ school-led, not necessarily child-led

		Interventions include those which have been established with the help of the Therapist or Assistant but become self-sustaining within settings.
3	Targeted 2	Interventions include those that require the direct involvement of a SLT for assessment and monitoring but which can be delivered by staff or parents. Would require a referral and then assessment but not necessarily 1:1: delivery by trained TA, & training for parents
4	Specialist	This level supports those children who have a defined clinical need and where the SLTs expertise together with the agent of change, for example a parent or key worker will make a significant contribution

The Service Provider will deliver speech and language therapy for those Children and Young People (CYP) with Education Health Care (EHC) plans who have SLCN needs identified in Part F of the EHC plan on a case by case basis in mainstream schools in or out of the borough aged 0-25. The provider will deliver speech and language therapy in mainstream schools following an assessment and will deliver a package of therapy based on the assessed need identified in Section F of the EHCP, review the therapy provision and contribute to the statutory annual review. It will also include training staff in schools to implement the program to assist speech, language and communication, development in school to aid learning for those CYP with EHC plan. This training will help support implementation of Brent's Graduated Approach Framework which should reduce pressure on demand for EHCPs.

The written submissions for the EHC plans needs to be clear, accessible and specific. They should provide advice about outcomes relevant for the child or young person's age and phase of education, and strategies for their achievement. This advice should be co-produced with the child's parents and/or the young person. Professionals should limit their advice to areas in which they have expertise. Advice and information requested by the local authority must be provided within six weeks unless personal exceptional circumstances affect the child, young person or parents.

The provider will also deliver support to children and young people known to the Youth Justice Service, who have an EHCP with SaLT specified in Section F. If there is capacity, the service will also offer training to YJS staff.

Taking a current baseline of 1035 children and young people with Speech Language Therapy needs as of 1st April 2025 with an anticipated expected 7% growth in demand each year until the end of the contract term.

Contract Year	Current CAP	In contract year growth, spot arrangement and ARPs: Baseline @Oct 2024	% increase from current CAP
24/25	770	1035	34%
New Contract Years	Number of CYP	plus Annual growth	Expected Number of CYP supported in each contract year
Year 1	1035	0%	1035
Year 2	1035	+7%	1108
Year 3	1108	+7%	1186
Year 4	1186	+7%	1269

Year 5	1269	+7%	1358
--------	------	-----	------

Key Changes to current provision:

Speech and language Therapy for those Children and Young People (CYP) with Education Health Care (EHC) plans who have SLCN needs identified in Section F of the EHCP is funded through the High Needs Block budget. Funding from the Council's General Fund has been used to cover the costs of early intervention in early years through Family Wellbeing Centres. However, due to financial pressures facing the Local Authority this element of funding is not being recommissioned. This element is not a statutory service in terms of SEND.

The Council's Early Help Service is leading on a project, working with Brent Public Health and Speech and Language UK, to develop a whole system approach and pathways to communication needs for children from pre-birth to seven years old. This project should deliver more awareness and action around support for communication needs from a wider range of partners, including health, public health and early help.

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

Children and Young People
 Parents/Carers/guardians
 Schools and other education settings
 Practitioners working with Children and Young People

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

Yes

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

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

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

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?	x	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	
<p>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.</p>		

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 Service ensures the council meets its statutory responsibility to provide the level of care specified in Section F of a child's Education, Health and Care Plan with regards to speech and language therapy and an equitable service across all Key Stages considering the needs of children and young people requiring the service. The service is expected to achieve the following outcomes:

- An improvement in the educational attainment and ability to participate in the curriculum of children and young people with occupational therapy needs listed in Section F of their EHC Plan.
- Children and young people who are aware of and, where possible, able to independently use strategies to support their therapeutic difficulties in everyday situations.
- Children and families receiving a seamless service when transferring between primary, secondary and independent providers of occupational therapy, and are aware of the on-going support available.

The Service is also expected to contribute towards achieving the following outcomes:

- The rate of improvement in under-achieving groups is accelerated
- All children and young people with SEND are able to access the same wide educational opportunities and life chances as others.

The service adheres to all aspects of the SEND Code of Practice 2015 (updated October 2020).

Funding from the HNB is used to support the statutory service element of this service. The LA has had to review and re-prioritise General Fund funding allocated to services for children and young people which has resulted in a decision not to re-commission the service in the current contract for pre-school aged children with speech, language and communication needs as part of a universal support offer in Family Wellbeing Centres.

The SEN Code of Practice 2014 is clear where statutory duties lie for SEND provision. In relation to SaLT this is to ensure provision of SaLT for children with SaLT specified in section F of their EHCP. From April 2025, the service delivery of SaLT, funded by the HNB, will only cover statutory provision; i.e. as specified in Section F of EHCPs.

It is clear that other partners, both within the LA and outside, have a role to play in meeting the communication needs of children, particularly in early years. The Inclusion and Early Help services will work with these partners to ensure they are linked to the project underway with Speech and Language UK to develop a whole system approach to communication needs for children from pre-birth. This project should deliver more awareness and action around communication needs from a wider range of partners.

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	
Details of impacts identified	<p>The new service will have a negative impact on children accessing early intervention services at Family Wellbeing Centres/early years settings as the universal offer of the current service, that includes group work provision, will no longer be provided through the new contract.</p> <p>The Speech and Language UK project will support further work with partners to ensure they are meeting their statutory obligations.</p>
DISABILITY	
Details of impacts identified	<p>The new service will impact on children in early years who may or may not have a disability.</p> <p>Some of the children who have previously accessed early intervention in communication needs at Family Wellbeing Centres would not have had a disability, but may have had delays in certain development areas which good communication skills can help them overcome. These children do not have a disability although they will be affected by this change to the service.</p> <p>Children in early years who do have a disability will now no longer be able to access this early intervention and may therefore not make such good progress. This may result in issuing Education Health Care Plans earlier than if they had received the early intervention if they cannot access support in other ways.</p>
RACE	
Details of impacts identified	<p>The service will impact equally upon all children and young people and their parents and carers regardless of race who have an Education Health Care Plan with SLT Therapy needs identified in Section F of their plan.</p>
SEX	
Details of impacts identified	<p>The service will impact equally upon all young people and their parents and carers regardless of their gender who have an Education Health Care Plan with SLT Therapy needs identified in Section F of their plan.</p>
SEXUAL ORIENTATION	
Details of impacts identified	<p>The service will impact equally upon all young people and their parents and carers regardless of their gender who have an Education Health Care Plan with SLT Therapy needs identified in Section F of their plan.</p>

PREGANCY AND MATERNITY	
Details of impacts identified	The service will impact equally upon all young people and their parents and carers regardless of their gender who have an Education Health Care Plan with SLT Therapy needs identified in Section F of their plan.
RELIGION OR BELIEF	
Details of impacts identified	The service will impact equally upon all young people and their parents and carers regardless of their gender who have an Education Health Care Plan with SLT Therapy needs identified in Section F of their plan.
GENDER REASSIGNMENT	
Details of impacts identified	The service will impact equally upon all children and young people and their parents and carers regardless of Gender assignment who have an Education Health Care Plan with SLT Therapy needs identified in section F of the plan.
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	The service will impact equally upon all young people and their parents and carers regardless of their gender who have an Education Health Care Plan with SLT Therapy needs identified in Section F of their plan.

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?

Consultation has taken place with a range of internal and external stakeholders to inform future delivery. Parent and carers, schools and early years' settings were consulted at the beginning of the service review (October 2023), although response to the surveys was low (4 responses from parents and 4 from schools/ settings). A meeting was also held with Brent Parent Carer Forum to discuss the changes in November 2023. Respondents were overall positive about improving access to therapies.

Updates on the progress of the review has been taken to Schools Forum.

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?

The reduction in universal provision may be mitigated through the universal offer supported by Public Health. The Speech Language UK project is intended to ensure better universal

provision is available from a wider range of services to meet children's communication needs in the early years.

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

The delivery of speech, language and communication needs will be overseen by the Local Area Partnership (Local Authority, Public Health and Integrated Care Partnership Health partners).

Robust contract monitoring processes will be put in place to monitor outcomes and impacts and to inform future delivery. This includes regular feedback from service users, monitoring complaints and compliments received, service data analysis and contract monitoring meetings.

SECTION C - CONCLUSIONS

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

Any provider will be required to maintain diversity monitoring information which will be reviewed as part of the quarterly contract monitoring processes and will inform the future planning of services.

Consultation and engagement with key stakeholders will continue to sustain a co-production approach to enhance local services.

The importance of all partners delivering their statutory duties will be key to ensuring that children and young people with SLCN make good progress.

SECTION D – RESULT

<i>Please select one of the following options. Mark with an "X".</i>		
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.


Action	Expected outcome	Officer	Completion Date
Establish a clear implementation plan and contract review plan, working with the stakeholders	To mitigate negative impacts by, for example, ensuring take-up of training before the new contract starts and under the scope of the new contract, signposting to other services.	Tanuja Saujani/Roxanna Glennon/Serita Kwofie	Ongoing
Ensure SEND/ Inclusion Service representation in design and delivery of S&L UK Project	To ensure early years communications needs are met through a comprehensive range of providers.	Roxanna Glennon/ Serita Kwofie	December 2024
Set up and organise regular meetings of SLCN group	To ensure key partners: health, public health and early help collectively develop early intervention and prevention work around SLCN.	Roxanna Glennon	Already started - ongoing

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Tanuja Saujani
REVIEWING OFFICER:	Yasin Patel
HEAD OF SERVICE:	Roxanna Glennon

This page is intentionally left blank

 Brent	Cabinet 10 February 2025
	Report from the Corporate Director, Community Health and Wellbeing
	Lead Member – Cabinet Member for Adult Social Care, Public Health and Leisure (Councillor Neil Nerva)
Authority to Tender contracts for the Provision of Extra Care Housing Support for six Extra Care Schemes	

Wards Affected:	Kingsbury, Stonebridge, Sudbury, Wembley Central & Wembley Hill and Willesden Green
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:	None
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Mark Mulvenna Supplier Relationship Manager, Community Health & Wellbeing 020 8937 4139 mark.mulvenna1@brent.gov.uk

1.0 Executive Summary

1.1 This report concerns the procurement of Extra Care Housing (ECH) support for six extra care schemes. This report requests approval to invite tenders for the provision of ECH support services that will be split into two contracts or lots to cover the six extra care schemes at Beechwood Court, Harrod Court, Tulsi House (Lot 1); and Rosemary House, Newcroft House and Willow House (Lot 2), and as it is required by Contract Standing Orders 88 and 89.

2.0 Recommendation(s)

That Cabinet:

- 2.1 Approve inviting tenders for the provision of Extra Care Housing (ECH) support services for six extra care schemes split into two contracts/lots on the basis of the pre - tender considerations set out in paragraph 3.4 of the report.
- 2.2 Approve Officers evaluating the tenders referred to in 2.1 above on the basis of the evaluation criteria set out in section (vi) of the table at paragraph 3.4.1 of the report.
- 2.3 Delegate authority to the Corporate Director, Community Health and Wellbeing in consultation with the Lead Member for, Community Health and Wellbeing to award the contract for each of the two lots for the provision of ECH support services for the six extra care schemes for a term of three (3) years with the option to extend by a maximum of two (2) years on a one plus one basis (3+1+1).

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 The upcoming tender for the Extra Care is strategically positioned to significantly contribute to Brent Council's Borough Plan outcomes. This setting, dedicated to serving vulnerable adults over the age of 55, is crucial in enhancing resident health and well-being through providing an alternative to care homes, through a core service and assessed support to keep people as independent as possible. Furthermore, the setting not only supports employment in the local community, but also enhances the resilience of these communities by fostering supportive networks. This tender will ensure the continued alignment with and contribution to the Council's aspirations, promoting a healthier, more equitable, and unified community.
- 3.1.2 Strategic Priority 5 within the Brent Borough plan 2023-27: Moving Brent Forward Together¹ is about building a healthier Brent. One of the desired outcomes of this is Desired Outcome 1 under tackling health inequalities, to ensure all adults with care and support needs are able to access support and services and they are integrated with health, culturally competent and responsive to individual need. To work with NHS and partners to deliver more cross-sector working within services that impact on health, such as housing, mental health and community safety.
- 3.1.3 Desired outcome 2 of the Strategic Priority 5 is for localised services for local needs. This includes continuing to support people to be cared for closer to

¹ <https://www.brent.gov.uk/the-council-and-democracy/strategies-priorities-and-policies>

home, by developing health and social care community services to help people, including those with complex needs, to live at home independently while also addressing key health issues including heart disease and respiratory conditions.

- 3.1.4 The proposed extra care contracts at these 6 schemes will help achieve desired outcome 1 and 2 of the Strategic Priority 5 by ensuring extra care accommodation with core and assessed support is available to adult social care residents over the age of 55 to allow them to live more independently and promote their wellbeing.

<https://www.brent.gov.uk/the-council-and-democracy/strategies-priorities-and-policies>

3.2 Background

- 3.2.1 The Council currently has two contracts for the provision of Extra Care Housing support services for six extra care schemes. One contract was awarded to Westminster Homecare Limited which commenced on 3rd September 2018, for three of the six extra care schemes (Beechwood Court, Harrow Court and Tulsi House). The other contract was awarded to London Care Limited which commenced on 4th June 2018, for three extra care schemes (Willow, Newcroft and Rosemary House(s)). The two contracts were let for an initial period of five years with an option to extend by up to two further years (the “Contracts”).
- 3.2.2 The two Contracts were extended and varied so as to align their termination and enabling the procurement of all six extra care schemes before their expiry date on 2nd June 2025 . Details of the extension and variations of the Contracts are in the Officer Key Decisions of 3rd August 2023 and 22nd August 2023 and the Director of Adult Social Care’s decisions of 28th May 2024.
- 3.2.3 The six extra care schemes are placed in properties owned and managed by SNG (Sovereign Network Group) and they have given permission for the properties to be included as part of this tender exercise as they will continue to be properties specifically for those over 55 years of age.
- 3.2.4 Currently there are 7 step down flats across two of the blocks and ASC has taken the decision to no longer have step down beds within these blocks. The process of returning the step down flats to be used as general needs over 55 housing will be undertaken throughout 2025, although it should be noted that this does not affect the core hours proposed as part of this tender which are specific to the blocks and not individual flats.

Name of Scheme	Number and size of flats.	Primary care group
Beechwood Court, Wembley	20 one bedroom flats	Dementia
Harrod Court, Kingsbury	38 one bedroom and 2 two bedroom flats	General needs aged 55+
Rosemary House, Willesden	40 one bedroom flats	General needs aged 55+
Tulsi House, Sudbury	32 one bedroom and 4 two bedroom flats	General needs aged 55+
Willow House, Wembley	38 one bedroom and 2 two bedroom flats	General needs aged 60+ Care needs aged 55+
Newcroft House*, Stonebridge	37 one bedroom and 3 two bedroom flats	General needs aged 55+
*Newcroft House currently has 25 units that are used specifically for supported housing (was 10 in 2018) and as each new (void) unit becomes available it is specifically allocated for supported housing.		

3.2.5 The services are designed to meet the varying needs of residents, to promote health and wellbeing and to enable borough residents to live independently in their home and reduce the potential of moving to residential care. The scheme generates efficiency savings to ASC through the provision of care and support in place of residential placements, where the council is responsible for care and accommodation costs. In an extra care service, the council will fund care, Housing Benefit is used to pay accommodation costs. The services are available for people who self-fund and are able to afford their rent and care costs.

3.3 Model of Delivery

3.3.1 The council's eligibility threshold for extra care housing (ECH) support was reviewed as part of a strategic move towards maximising service provision and best meeting the needs of the residents of Brent. The procurement of the ECH support contracts is to ensure that two successful providers are able to meet the needs of a mixed group of residents from the community with a range of age groups from 55 years + and a range of needs including adults with physical needs, sensory, mental health (including Dementia) and learning disabilities as well as those with complex needs and behaviours that challenge. In maintaining the eligibility to those 55 years and above, the service is best able to meet the wider demand for ECH support within the community.

- 3.3.2 This contract will be based on a core and flexi model with only the core element being the “contracted amount” as per the current contract. The core service is designed to meet unplanned and emergency care needs and night support. The flexi hours will be based on service user’s assessed needs and support hours will fluctuate as individuals’ needs change. Residents will be able to choose another care provider to deliver their assessed hours, or arrange their own care through a Direct Payment, but the successful provider will deliver the core hours in the service.
- 3.3.3 Core care and support hours will be available throughout the day and night to meet the planned and unplanned needs of residents for example, fluctuating/unpredictable care needs, responding to emergency alarm calls, requests for assistance with toileting, thereby ensuring a safe and responsive service delivery.
- 3.3.4 The core service will require cover on a 24 hours basis.
- 9am to 5pm Monday to Friday – Team Leader or equivalent.
 - 7am to 9am & 5pm to 9pm – An on call service to support if required those carers carrying out individually assessed packages
 - 9pm to 7am – 2 Night support workers
 - 7am to 9pm Saturday/Sunday and Public Holidays - An on call service to support if required those carers carrying out individually assessed packages
- 3.3.5 Each contract/lot which will comprise of 3 extra care schemes (‘Schemes’) and bidders will be asked to source the following staff or similar who will work across the 3 Schemes and cover for each other during any absences.
- One Health and Wellbeing/Activities coordinator
 - One Deputy Manager
 - One Registered Manager (See paragraph below)
- 3.3.6 There will be a requirement to have a registered manager in place who will spend time across all 3 schemes within the service. The other roles specified above are a guide and bidders may have different titles for these roles, but the overall value of the contract and the estimated assessed hours will give each bidder an idea of the levels of staff that will be required in the various roles, such as “Senior Support Worker”.
- 3.3.7 A budget to cover at least the services as shown above will be made available and bidders will be encouraged to be innovative about the way the Core Hours are covered making sure the minimum requirements as shown below are covered.

Night Support Workers

- 3.3.8 Having 2 Night Support Workers at extra care schemes is now the normal approach particularly to avoid the issues that can be encountered with lone working. It will also increase the level of oversight and response times to

potential emergencies; and also ensure that there is someone available to continue the normal duties of a night worker in an emergency or where a service user perhaps acts in an unpredictable way.

3.3.9 Four of the Schemes currently have 2 night support workers, so this will bring all Schemes into line with each other, particularly the dementia specific scheme where there is only 1 night support person at present.

3.3.10 We will expect the provider to manage the work of the night support worker so that they can cover the periodic check up calls (usually 15 mins in duration) that people sometimes require throughout the night and where perhaps people require pads to be changed or to be re-positioned at night.

Core hours are based on an average of 5-6 hours, per week, per person.

	Units	Core Hours	Breakdown
Willow	40	238	1 x 24 Hr Support x 7 = 168 1 x 10 Hr 2nd Night Support Worker x 7 = 70
Rosemary	40	238	1 x 24 Hr Support x 7 = 168 1 x 10 Hr 2nd Night Support Worker x 7 = 70
Newcroft	40	238	1 x 24 Hr Support x 7 = 168 1 x 10 Hr 2nd Night Support Worker x 7 = 70
Harrod	40	238	1 x 24 Hr Support x 7 = 168 1 x 10 Hr 2nd Night Support Worker x 7 = 70
Tulsi	36	238	1 x 24 Hr Support x 7 = 168 1 x 10 Hr 2nd Night Support Worker x 7 = 70
Beechwood*	20	238	1 x 24 Hr Support x 7 = 168 1 x 10 Hr 2nd Night Support Worker x 7 = 70
Hours where there has to be a dedicated Core person on site are - 9pm to 7am - 7 Days per week Monday-Friday 9am to 5pm			
* Beechwood has an increased ratio of Core Hours as a Dementia specific service.			

3.3.11 Assessed hours based on people's individual needs will be determined by a Social Worker and will be purchased using the spot hourly rate that will be submitted as part of this tender. However, if any of the needs identified can be carried out by the Core staff on site (particularly the night support workers), then although these hours/visits will form part of the care plan, they will not be chargeable. This will be made clear in the specification. It will be part of the tender requirements that the spot rate per hour should not exceed the core hourly rate and is likely to be lower due to the fact that a lot of a bidder's central overheads will be already be present within the core costs. The estimated assessed hours for 2024/2025 are shown below and are based on the total hours submitted for each block for 2023/2024. Whilst these are not guaranteed, it is acknowledged that the reason people move into extra care schemes is that they have care needs and are likely to have a package of assessed care that needs to be provided for.

Estimated assessed hours and costs for 2024/2025			
Based on Total Hours submitted for 2023/2024			
Lot 1	Yearly Hours	Hourly Rate	Estimated Yearly Cost
Beechwood	15077	£21.70	£327,170.90
Harrod	31432	£21.51	£676,102.32
Tulsi	22374	£21.79	£487,529.46
		Total	£1,490,802.68
Lot 2	Yearly Hours	Hourly Rate	Estimated Yearly Cost
Newcroft	18144	£18.96	£344,010.24
Rosemary	30072	£18.96	£570,165.12
Willow	45618	£18.96	£864,917.28
		Total	£1,779,092.64

3.4 Pre Tender Considerations

3.4.1 In accordance with Contract Standing Orders 88 and 89, pre-tender considerations for the procurement of the contract for the provision of Extra Care Housing (ECH) support for six extra care schemes (the “Contract”) have been set out below for the approval of the Cabinet.

Ref.	Requirement	Response
(i)	The nature of the services.	<p>Delivery of extra care housing support services at the six extra care housing schemes detailed in the body of the report.</p> <p>The support is for older adults with care and support needs at substantial or critical level and an identified social housing need.</p> <p>Needs may include physical disabilities, mental health issues (including dementia, alzheimer’s, learning disabilities) and a range of other needs.</p>
(ii)	The estimated value.	<p>Up to £4,325,932 for Lot 1 and up to £4,325,932 for Lot 2 over the term of the Contract including any extensions provided for under the Contract</p> <p>Up to £865,186 p.a. for each Lot over the proposed contract length of five years (3+1+1). This is based on 37,230 Core Hours for each Lot.</p>
(iii)	The contract term.	Three years initial period with the option to extend for a further two, on a one plus one year extensions (3+1+1)

		<p>financial standing requirements, technical capacity and technical expertise.</p> <ul style="list-style-type: none"> At tender evaluation stage, the panel will evaluate the tenders against the following criteria: 50% quality, 10% Social Value and 40% price. This procurement will be divided into two lots. Bidders will be asked to identify their preferred Lot should they decide to bid for the two lots. The bidder with the highest score will be awarded with their chosen lot and the second-highest bidder will be awarded the remaining Lot. The Council will reserve the right to not award any of the lots if bidders do not pass the quality criteria; or award the two lots to the highest scored bidder.
(vii)	Any business risks associated with entering the Contract.	Financial Services and Legal Services have been consulted concerning this contract and there are no risks identified associated with entering into this contract.
(viii)	The Council's Best Value duties.	The adoption of an open tendering process under Light Touch Regime will enable the council to achieve best value for money.
(ix)	Consideration of Public Services (Social Value) Act 2012	See section 11 below
(x)	Any staffing implications, including TUPE and pensions.	There will be TUPE implications which have been taken into consideration. See Section 9 below.
(xi)	The relevant financial, legal and other considerations.	See sections 5 and 6 below.
(xii)	Sustainability	This has been assessed in line with the Procurement Sustainability Policy and determined that a quality measure for sustainability is not required and can be captured as part <ul style="list-style-type: none"> of the Social Value criteria.
(xiii)	Key Performance Indicators / Outcomes	Appropriate Key Performance Indicators/Outcomes will be included in the Contract.

(xiv)	London Living Wage	The Contract will require the payment of the London Living Wage.
(xv)	Contract Management	This contract has been assessed against the contract segmentation process which determined it is classified as a major contract. A contract manager will be appointed and appropriate contract management provisions will be included in the Contract.

4.0 Stakeholder and ward member consultation and engagement

4.1 The lead Member for Community Health & Wellbeing has been consulted and a consultation with the provider of the accommodation has been undertaken. Resident’s were consulted with at meetings that were held in the Spring of 2024 and any changes to the provider of these services after this procurement will be relayed to the provider of the accommodation and residents throughout the mobilisation phase.

5.0 Financial Considerations

5.1 The estimated total value of the core services to be provided under the contracts over the contract term of 5 years (3+1+1) is £4,325,932 for Lot 1 and £4,325,932 for Lot 2 at today’s prices, based on an estimated annual cost of £865,186 for each Lot.

5.2 The estimated value of this contract will be funded from existing ASC budgets. Cost modelling has taken place, and it is expected that the change of provision of the service will be contained within the existing EHC budget.

5.3 The cost modelling was based on this contract being London Living Wage compliant at £13.85 per hour. To deliver the agreed amount of hours under the core/block element of this contract will mean approx. 41 FTE support workers will benefit from being paid at least the current minimum LLW of £13.85ph. It should be noted that the LLW rate that will be used in Brent contracts from 1st April 2025 was announced in October 2024.

6.0 Legal Considerations

6.1 The services that Officers are proposing to procure (care and support) fall under Schedule 3 of the Public Contracts Regulations 2015 (“PCR 2015”) and a such are subject to the PCR 2015 “light-touch regime”. Officers are recommending to divide this opportunity into two lots, which can be awarded under two separate contracts. Since the estimated value for each of the two lots is above the threshold for Schedule 3 Services (see paragraph 4.1) currently set at £663,540 (inclusive of VAT) the procurement is therefore governed by the

requirements set in Regulations 74 to 77 of the PCR 2015 and which include the publication of a contract notice; conducting the procurement in conformance with the information provided in the contract notice; setting time limits that are reasonable and proportionate; and compliance with the principles of equality of treatment, fairness and transparency in the award of contracts.

- 6.2 The procurement is also subject to the Council's own Standing Orders and Financial Regulations in respect of High Value Contracts given that the estimated value of each lot is above £2 million. For High Value Contracts, Cabinet must approve the pre-tender considerations set out in paragraph 3.4.1 above (Standing Order 89) and the inviting of tenders (Standing Order 88).
- 6.3 Officers in recommendation 2.3 are requesting Cabinet to delegate the award of the contract(s). Therefore, if Cabinet grants such delegation once the tendering process is undertaken, officers will report to the Corporate Director, Community Health and Wellbeing explaining the process undertaken in tendering the Contract and recommending the award of the contact(s) to be taken in consultation with the Lead Cabinet Member for, Community Health and Wellbeing.
- 6.4 The Council intends to observe a minimum of 10 calendar standstill period before the contract(s) are awarded. This will include notifying all tenderers in writing of the Council's decision to award and providing additional debrief information to unsuccessful tenderers on receipt of a written request. The standstill period provides unsuccessful tenderers with an opportunity to challenge the Council's award decision if such challenge is justifiable. However, if no challenge or successful challenge is brought during the period, at the end of the standstill period the Council will issue a letter of acceptance to the successful tenderers and the contracts may commence
- 6.5 Officers have set out in section 8.1 that the proposed services will be provided by external contractors and that there are no implications for the Council's staff arising from this procurement under the Transfer of Undertakings (Protection of Employment) Regulations 2006 ('TUPE'). However, in the present case if the lots are awarded to a new contractor(s) TUPE is likely to apply so as to transfer from the current to the new contractor those employees of the current contractors who spend all or most of their working time on the activities taken over by the new contractor(s).

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 Pursuant to s149 Equality Act 2010 (the "Public Sector Equality Duty"), the Council must, in the exercise of its functions, have due regard to the need to:
- (a) eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act
 - (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.

7.2 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.

7.3 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.

7.4 These services respond to the specific needs of older people in the community who due to their age and health conditions are likely to need accommodation that is more suitable, accessible, safer and with appropriate levels of support to enable them to retain their independence. Equalities issues particularly with regard to age have been taken into account throughout the review of the services and have been a key focus in the service model and service specification.

7.5 An Equalities Analysis has been completed. Any negative impacts that have been identified these have been addressed within the service model and specification. Where positive impacts of the proposed model have been identified they have been enhanced where possible.

7.6 The service model is expected to continue to deliver an improved quality of life for service users. Impacts of any change of provider will be monitored throughout the implementation period to ensure the quality of service is maintained. A robust Quality Assurance Framework and Performance Management Framework are included in the service specification and associated schedules.

8.0 Climate Change and Environmental Considerations

To set out how the proposals impact on the Council's environmental objectives and climate emergency strategy.

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

9.0 Human Resources/Property Implications (if appropriate)

- 9.1 This service is currently provided by an external contractor and there are no implications for Council staff arising from retendering the Contract.

As part of the procurement process, employee liability information will be sought from current contractors and provided to the tenderers. The TUPE process and any issues that may arise from it will be managed during the mobilisation phase, which will be at least two months between contract award and commencement.

- 9.2 The properties for the service provision are provided by an external provider and there are no direct property implications for the Council arising from the tender process.

10.0 Communication Considerations

- 10.1 To enhance the existing communication plan, given our familiarity with the resident population, a tailored communication plan will be put in place with service users and their families.

11.0 Public Services (Social Value) Act 2012

- 11.1 The Council is under duty pursuant to the Public Services (Social Value) Act 2012 (“the Social Value Act”) to consider how services being procured might improve the economic, social and environmental well-being of its area; how, in conducting the procurement process, the Council might act with a view to securing that improvement; and whether the Council should undertake consultation. Officers have had regard to considerations contained in the Social Value Act in relation to the procurement.

- 11.2 It is the intention within this tender that 10% of the total evaluation criteria will be reserved for social value considerations.

- 11.3 The services are fully established within the wards and have good community ties and access to local resources. To ensure a real sense of place and belonging, the housing and provision aims to keep the community together supporting the existing demographic within the wards. Residents have access to shared transport links, shared Interests, community groups and worship facilities and the sense of community is reinforced from this. Providers will be expected to focus on the social value themes and outcomes and these will be measure throughout the term of the contract. Themes predominantly focus on the immediate community, while linking local areas together to maximise the benefits to residents.

- 11.4 The social value themes focus on the immediate and wider community linking local areas together to maximise the benefits to residents. The themes will seek to:
- Promote growth and development opportunities for all residents within the borough. Providing access to opportunities to develop new skills and gain meaningful employment.

- Building strong, ongoing relationships with the voluntary and social enterprise sectors to continuing to engage and empower citizens, creating a safe, healthier, resilient community for the present and future.
- To ensure the places where residents live within the borough utilise sustainable procurement supporting a cleaner and greener, and secure the long-term future for the community and our planet.
- For providers to be innovative as the council promotes best practice, they should find and deliver innovative solutions and generate new ideas.

Related documents for reference:

Cabinet report for 9 April 2018 – Authority to award Care and Support Contracts for six Extra Care Schemes


Officer Key Decision Report – June 2018 – Authority to Award Contract at Beechwood Court, Harrod Court and Tulsi House

Officer Key Decision – 3 August 2023 - Authority to extend contract for the provision of extra care housing (ECH) services at willow, newcroft and rosemary house(s)

Officer Key Decision - 22 August 2023 - Authority to Vary and Extend a Care and Support Contract within Extra Care Housing Schemes

Report sign off:

Rachel Crossley
Corporate Director, Community Health
and Wellbeing

 Brent	Cabinet 10 February 2025
	Report from the Corporate Director of Partnerships Housing and Resident Services
	Lead Member – Cabinet Member for Housing and Resident Support (Councillor Fleur Donnelly- Jackson)
Authority to award contract for Housing Repairs & Maintenance Service	

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>	Part Exempt – Appendix 1 is exempt as it contains 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)"
No. of Appendices:	Three Appendix 1: List of Tenderers (exempt) Appendix 2: Tender Evaluation Appendix 3: Equality Assessment
Background Papers¹:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Ryan Collymore, Head of Housing Property Services 020 8937 1204 Ryan.Collymore@brent.gov.uk

1.0 Executive Summary

- 1.1 This report concerns the outcome of the tender for the repairs and maintenance contract which expires 31 March 2025. This report requests authority to award contracts as required by Contract Standing Order 88. This report summarises the process undertaken in tendering these contracts and, following the

completion of the evaluation of the tenders, recommends to whom the contracts should be awarded.

2.0 Recommendation(s)

That Cabinet:

- 2.1 Approve the award the contract for Lot 1 Responsive Repairs to Wates Property Services Limited for a term of five years plus an option to extend for three years and one further two year extension for the estimated annual value detailed in paragraph 6.1 below.
- 2.2 Approve the award the contract for Lot 2 Planned Works to Wates Property Services Limited for a term of five years plus an option to extend for three years and one further two year extension for the estimated annual value detailed in paragraph 6.1 below.
- 2.3 Approve the award the contract for Lot 3 Voids Repairs to Wates Property Services Limited for a term of five years plus an option to extend for three years and one further two year extension for the estimated annual value detailed in paragraph 6.1 below.
- 2.4 Approve the award the contract for Lot 4 Responsive Repairs to Masher Brothers Limited for a term of five years plus an option to extend for three years and one further two year extension for the estimated annual value detailed in paragraph 6.1 below.
- 2.5 Approve the award the contract for Lot 5 Planned Works to Mears Limited for a term of five years plus an option to extend for three years and one further two year extension for the estimated annual value detailed in paragraph 6.1 below.
- 2.6 Approve the award the contract for Lot 6 Voids Repairs to Greyline Group Limited for a term of five years plus an option to extend for three years and one further two year extension for the estimated annual value detailed in paragraph 6.1 below.

3.0 Detail

Cabinet Member Foreword

- 3.1 This report outlines the proposals for the future of the repairs service and how officers have worked closely with members to agree on a preferred option. It is anticipated that the service set out in this report will utilise a framework of local contractors and a handyperson's service. It is expected that some of the procured contractors will be based in Brent and some the handypersons recruited will be Brent residents. This is in line with the Council's strategic priorities of Prosperity and Stability in Brent, Community Wealth Building and Thriving Communities.

- 3.2 The Borough Plan includes two priorities specific to Housing, that are;
- Strategic Priority 1 – Prosperity and Stability in Brent
 - Strategic Priority 2 – A Cleaner, Greener Future
- 3.3 These two priorities re-affirm the Council’s ambition to continue building new Council homes with a target of 1,700 homes by 2028 and improving the quality of housing across the private sector and in the Council’s own housing stock. Housing is also a key stakeholder in the delivery of Green Neighbourhoods both through the engagement with Registered Providers and investment in Council owned homes, specifically retrofitting poorly performing housing. It is acknowledged that whilst Housing is not specified in the remaining priorities set out in the borough plan, a safe, suitable, and secure place to call home is a foundation for Thriving Communities, The Best Start in Life, and a Healthier Brent.
- 3.4 Other strategies that are relevant to Housing include:
- Black Community Action Plan
 - Climate and Ecological Emergency Strategy
 - Homelessness and Rough Sleeper Strategy
 - Equality Strategy
 - Health and Well-being Strategy
 - Procurement Strategy
 - Local Plan
 - Inclusive Growth Strategy
- 3.5 Future Strategies due for delivery this year that will also provide context are the Private Housing Strategy, Tenant and Leasehold Engagement Strategy and overarching Housing Strategy.

4.0 The Tender Process

- 4.1 Advertisements were placed on Find a Tender Service and Contracts Finder service on 27/06/2024 to seek expressions of interest, which elicited 44 initial enquires. Contractors were provided with the contract documents and details of the tender approach.
- 4.2 All tenders had to be submitted electronically no later than 30/08/2024 12:00. Tenders were opened on 02/09/2025, and 11 No. valid tenders were received. Each member of the evaluation panel read the tenders and carried out an initial evaluation of how well they considered each of the award criteria was addressed in the tender.
- 4.3 On 11 March 2024 Cabinet approved that the final evaluation criteria would be agreed by Corporate Director, Housing and Resident Services, in consultation with the Corporate Director, Finance and Resources. The agreed tendering

instructions stated that the contract would be awarded on the basis of the most economically advantageous offer to the Council and that in evaluating tenders, the Council would have regard to the following:

- 50% weighting for Cost assessment
- 40% weighting for Quality assessment
- 10% weighting for Social Value assessment

4.4 Tenderers could submit a bid for all lots, but an award would be restricted to three per contractor. In addition, a tenderer could not be awarded the same workstream from both areas, for example, a tenderer could not be awarded lot 1 and lot 4, lot 2 and lot 5 & lot 3 and lot 6. However, a tenderer could be awarded lot 1,2 & 3 or lot 4,5 & 6 based on the tender considerations set forth above. A tenderer could be awarded multiple lots across both areas if it is not the same workstream, for example a tenderer could be awarded lot 3, lot 5, and lot 1. Where a tenderer scored overall highest in two lots with same workstream, the Council will award the tenderer based on the most economically advantageous grouping of the lots, subject to agreement by the tenderer.

4.5 The new contracts will be let using JCT contracts with amendments for an initial term of 5 years plus optional extension periods of 3 and 2 years respectively. The contracts for each lot should be materially the same to ensure contract management is not cumbersome.

5.0 Evaluation process

5.1 The tender evaluation was carried out by a panel of officers from Property Services and two local residents for one specific question.

5.2 All tenders had to be submitted electronically no later than 30/08/2024 12:00. Tenders were opened on 02/09/2025, and 11 No. valid tenders were received. Each member of the evaluation panel read the tenders and carried out an initial evaluation of how well they considered each of the award criteria was addressed in the tender.

5.3 The panel met (***moderation meetings***) between 08/12/2024 to 16/12/2024 and each submission was marked by the whole panel against the award criteria.

5.4 The names of the tenderers are contained in Appendix 1. The scores received by the tenderers are included in Appendix 2. It will be noted that Tenderer **11** was the highest scoring tenderer for Lot 1, Tenderer **11** was the highest scoring tenderer for Lot 2, Tenderer **11** was the highest scoring tenderer for Lot 3, Tenderer **6** was the highest scoring tenderer for Lot 4 after discounting Tenderer 11 who bid for the same workstream in the other area, Tenderer **7** was the highest scoring tenderer for Lot 5 after discounting Tenderer 11 who bid for the same workstream in the other area and discounting Tenderer 8 because they withdrew from the process, Tenderer **3** was the highest scoring tenderer for Lot 6. Officers therefore recommend the award of the contract to

Tenderer **11** (Wates Property Services Limited for Lots 1, 2 and 3; Tenderer **6** (Masher Brothers Limited) for Lot 4; Tenderer **7** (Mears Limited) for Lot 5; and Tenderer **3** (Greyline Builders Limited) for Lot 6.

5.5 The contract will commence on 1 April, 2025 subject to the Council's observation of the requirements of the mandatory standstill period noted below.

6.0 Contract costs

6.1 The comparative contract costs are set out in the table below; however, these figures are estimates based on predicted volumes. These volumes will fluctuate particularly with responsive repairs and voids.

Area 1	New Tender £	Current Contract £	Difference £	Difference %
Lot 1 Repairs	3,237,418	1,824,451	1,412,967	77.45%
Lot 2 Planned	4,490,262	4,134,026	356,236	8.62%
Lot 3 Voids	2,107,828	2,636,002	(528,174)	(20.04%)
Total	9,835,508	8,594,479	1,241,029	14.44%
Area 2	New Tender £	Current Contract £	Difference £	Difference %
Lot 4 Repairs	2,668,823	2,097,980	570,843	27.21%
Lot 5 Planned	4,556,239	4,134,026	422,213	10.21%
Lot 6 Voids	1,209,626	2,547,029	(1,337,403)	(52.51%)
Total	8,434,688	8,779,035	(344,347)	(3.92%)
Grand Total	18,270,196	17,373,514	896,682	5.16%

7.0 Financial Considerations

7.1 Part 3 of the Council's Constitution state that contracts for works exceeding £10 million shall be referred to the Cabinet for approval of the award of the contract.

7.2 The annual value of this contract is currently estimated to be circa £18.24m at today's prices. The award of the contract is for an initial period of five years, with an option to extend for periods of three and two years respectively. This makes a total contact cost of £91.3m over five years at today's prices. The contract is subject to inflationary increases which will need to be considered as part of the Council's Medium Term Financial Planning.

7.3 It is anticipated that the cost of this contract will be funded from the Housing Revenue Account (HRA) budgets. In comparison, the current contract costs £17.3m, therefore there is a £0.8m increase in costs. The increase in costs has

been built into the HRA 30-year Business Plan in anticipation of this re-procurement.

- 7.4 The current level of responsive repair works and associated costs result in financial pressures on the existing budgets which are mitigated through wider efficiencies. This is in addition to broader budgetary pressures on the HRA fund associated with uncertainty around the inflation and interest rates, rising cost of major works, increasing complexities of additional requirements to building standards, such as fire safety, energy efficiency works and decarbonisation. The HRA is under significant financial pressures and any expenditure and investments plans must be considered carefully and mitigating measures might be required to continue achieving a balanced financial position.

8.0 Legal Considerations

- 8.1 The value of these contracts individually over their lifetime are in excess of the threshold for Works under the Public Contracts Regulations 2015 (PCR 2015) and the procurement and award of the contracts is therefore governed by the PCR 2015. As detailed in Section 3, a procurement process in compliance with the PCR 2015 has been conducted.

- 8.2 The award of the six contracts is subject to the Council's own Standing Orders and Financial Regulations in respect of High Value Contracts given the contracts are valued at more than £5 million. Part 3 of the Council's Constitution state that contracts for works exceeding £10 million shall be referred to the Cabinet for approval of the award of the contract.

- 8.3 The Council must comply with the PCR 2015 relating to the observation of a mandatory minimum 10 calendar day standstill period before the contract can be awarded. Therefore, once the Cabinet has determined which tenderer should be awarded the contract, all tenderers will be issued with written notification of the contract award decision. A minimum 10 calendar day standstill period will then be observed before the contract is concluded – this period will begin the day after all Tenderers are sent notification of the award decision – and additional debrief information will be provided to unsuccessful tenderers in accordance with the PCR 2015. After the standstill period ends, the successful tenderer will be issued with a letter of acceptance and the contract can commence.

- 8.4 The award of contracts will also be subject to leaseholder consultation pursuant to Section 151 of the Commonhold and Leasehold Reform Act 2002 (Section 20 consultation).

9.0 Equity, Diversity & Inclusion (EDI) Considerations

- 9.1 Pursuant to s149 Equality Act 2010 (the "Public Sector Equality Duty"), the Council must, in the exercise of its functions, have due regard to the need to:

- (a) eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
 - (c) relevant protected characteristic and persons who do not share it,
- 9.2 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.
- 9.3 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.
- 9.4 There is no prescribed manner in which the council must exercise its public sector equality duty but having an adequate evidence base for its decision is necessary.
- 9.5 The proposals in this report have been subject to screening and Officers believe that there are no adverse equality implications as noted in Appendix 3.

10.0 Consultation with Ward Members and Stakeholders

- 10.1 A Members Repairs re-procurement working group, included the Lead Member for Housing, Homelessness and Renters Security was formed late last year to provide constructive oversight and feedback on the design and delivery of the hybrid Repairs delivery model. Several meetings were held where discussions took place about the vision for the service and the progress of the delivery model.
- 10.2 In June 2024 residents were asked to provide their feedback on the re-procurement proposals online, there was also an in-person workshop and an online briefing. Residents were also invited to take part in the tender evaluations and two agreed to take part and undertook evaluations of the questions focused on customer experience.

11.0 Climate Change and Environmental Considerations

- 11.1 All contractors submitted sustainability statements as part of the tender which outlined climate change and environmental considerations. These included

deadlines on decarbonising their fleet and details of their proposed waste management plans. All statements were scored as part of the submission.

- 11.2 These proposals will be formalised through the mobilisation period and monitored throughout the year at Core Group meetings.

12.0 Human Resources/Property Implications (if appropriate)

- 12.1 This service is currently provided by an external contractor and there are no implications for Council staff arising from retendering the contract.

13.0 Public Services (Social Value) Act 2012

- 13.1 The Council is under duty pursuant to the Public Services (Social Value) Act 2012 (“the Social Value Act”) to consider how services being procured might improve the economic, social and environmental well-being of its area; how, in conducting the procurement process, the Council might act with a view to securing that improvement; and whether the Council should undertake consultation. Officers have had regard to considerations contained in the Social Value Act in relation to the procurement.

- 13.2 Each Social Value Theme (Strong Foundations; Every opportunity to succeed; A cleaner, more considerate Brent) was allocated a weighting and responses to the KPIs under each Theme and were given a score to which the weighting was applied. In evaluating Social Value questions, the Council had regard to The Social Value Commitments (action plan) contractors offered as part of these contracts; and The supporting information (method statement) contractors provided on how they proposed to deliver Social Value commitments as set out in the action plan which they populated with units and monetary value. The Council requires a Social Value monetary commitment of 10% of the total contract value.

14.0 Communication Considerations

- 14.1 Communication plans will be agreed with each contractor during the mobilisation period, which will include “meet the contractor days” and other initiatives outlined in the tender submissions.
- 14.2 The move from one contractor to four will be a big change for residents who have had the same contractor for over 10 years. It is important that residents understand how their service will change and what the expected performance is based on the new contracts.

Related document(s) for reference:

Future of Housing Repairs Service 11 September 2023.

Future of Housing Repair Service Update 14 February 2024

Approval of Pre-tender Considerations for Repairs and Maintenance Contractors 17 June 2024

Report sign off:

Peter Gadsdon

Corporate Director of Partnerships
Housing and Resident Services.

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

APPENDIX 2
REPAIRS AND MAINTENANCE CONTRACTS
TENDER EVALUATION GRID

Area 1 Responsive Lot 1				
No.	Quality SCORE	Cost Score	Total Score	Ranking
1	33.07692308	29.83967	62.91659	4
2	-	-	-	-
3	-	-	-	-
4	23.84615385	18.22320	42.06935	6
5	-	-	-	-
6	34.61538462	41.19024	75.80562	2
7	38.46153846	34.98710	73.44864	3
8	-	-	-	-
9	31.53846154	28.65642	60.19488	5
10	-	-	-	-
11	43.07692308	36.81557	79.89250	1

Area 1 Planned Lot 2				
No.	Quality SCORE	Cost Score	Total Score	Ranking
1	-	-	-	-
2	-	-	-	-
3	33.07692308	41.308271	74.385194	5
4	24.61538462	28.192262	52.807646	9
5	40.76923077	33.042485	73.811716	4
6	36.92307692	32.065960	68.989037	7
7	36.92307692	38.067562	74.990639	3
8	34.61538462	43.798239	78.413623	2
9	33.07692308	34.165873	67.242796	8
10	33.84615385	36.247430	70.093583	6
11	43.07692308	40.564592	83.641516	1

Area 1 Voids Lot 3				
No.	Quality SCORE	Cost Score	Total Score	Ranking
1	36.15384615	18.14	54.29208553	0
2	-	-	-	-
3	33.07692308	37.90	70.97286911	2
4	23.07692308	5.51	28.59134834	8
5	39.23076923	20.28	59.51127272	4
6	36.92307692	16.17	53.0952251	6
7	39.23076923	22.56	61.79281737	3
8	32.30769231	34.10	66.40495902	2
9	33.84615385	23.45	57.29417729	5
10	30.76923077	20.66	51.42998427	7
11	40.00000	34.10	74.09727	1

Area 2 Responsive Lot 4				
No.	Quality SCORE	Cost Score	Total Score	Ranking
1	33.07692308	30.24	63.31292535	5
2	-	-	-	-
3	-	-	-	-
4	-	-	-	-
5	-	-	-	-
6	34.61538462	41.19	75.80615114	2
7	38.46153846	36.37	74.82661718	3
8	-	-	-	-
9	31.53846154	32.64	64.17486366	4
10	-	-	-	-
11	43.07692308	36.61	79.68353689	1

Area 2 Planned Lot 5				
No.	Quality SCORE	Cost Score	Total Score	Ranking
1	-	-	-	-
2	-	-	-	-
3	33.07692308	41.35	74.42966398	4
4	-	-	-	-
5	40.76923077	32.95	73.72316994	5
6	36.92307692	31.93	68.85732946	7
7	36.92307692	37.90	74.82749322	3
8	34.61538462	43.63	78.24388704	2
9	33.07692308	34.04	67.11240741	8
10	33.84615385	36.12	69.96558306	6
11	43.07692308	40.49	83.56559827	1

Area 2 Voids Lot 6				
No.	Quality SCORE	Cost Score	Total Score	Ranking
1	36.92307692	18.07	54.99067811	8
2	38.46153846	18.06	56.52370439	7
3	33.07692308	37.77	70.84629787	1
4	-	-	-	-
5	39.23076923	19.96	59.19496471	5
6	36.92307692	16.04	52.96566232	9
7	39.23076923	22.54	61.77331317	4
8	32.30769231	33.61	65.91360416	2
9	33.84615385	23.93	57.77535428	6
10	30.76923077	20.29	51.05628394	10
11	40	21.79	61.78985487	3

This page is intentionally left blank

APPENDIX 3

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Award of Repairs and Maintenance Contracts
DEPARTMENT:	Partnerships, Housing and Resident Services
TEAM:	Property Services
LEAD OFFICER:	Ryan Collymore
DATE:	16/01/25

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 award of the repairs and maintenance contracts ensures Brent Council can execute their duties under the Section 11, Landlord and Tenants Act 1985. The contracts will also ensure that Council assets are maintained and high-quality services are provided to residents.

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

- Council tenants and leaseholders
- Brent Council staff
- Contractors

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.

There is no real relevance to equality in regard to the Repairs and Maintenance Contract. The Council is obligated to ensure that contractors undertake repairs to all occupied properties and blocks within the housing stock. Contractors will attend properties as requested regardless of who lives there. All contractors will be expected to work in line with Brent's Equality 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 tender documents have been assessed to enable this assessment to be made.

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

Details of impacts identified	Not applicable
--------------------------------------	----------------

DISABILITY

Details of impacts identified	Not applicable
--------------------------------------	----------------

RACE

Details of impacts identified	Not applicable
--------------------------------------	----------------

SEX

Details of impacts identified	Not applicable
--------------------------------------	----------------

SEXUAL ORIENTATION

Details of impacts identified	Not applicable
--------------------------------------	----------------

PREGANCY AND MATERNITY

Details of impacts identified	Not applicable
--------------------------------------	----------------

RELIGION OR BELIEF

Details of impacts identified	Not applicable
--------------------------------------	----------------

GENDER REASSIGNMENT

Details of impacts identified	Not applicable
--------------------------------------	----------------

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	Not applicable
--------------------------------------	----------------

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?

Not required.

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

No areas identified

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?

Any negative effects on particular groups will be identified through several methods of resident feedback including transactional customer satisfaction surveys, complaints and tenant satisfaction measures.

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.

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.


Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Ryan Collymore, Head of Housing Property Services 16/01/24
REVIEWING OFFICER:	
OPERATIONAL DIRECTOR:	Spencer Randolph, Director of Housing Services

This page is intentionally left blank

 Brent	Cabinet 10 February 2025
	Report from the Corporate Director of Partnerships, Housing and Resident Services
	Lead Member – Cabinet Member for Housing & Resident Support (Councillor Fleur Donnelly-Jackson)
Authority to Tender for the Provision and Management of Temporary Accommodation Housing Association Leasing Scheme	
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 1: Equality Impact Assessment
Background Papers:	
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Laurence Coaker, Director – Housing Needs & Support 020 8937 2788 Laurence.Coaker@brent.gov.uk

1.0 Executive Summary

- 1.1 This report requests approval to invite tenders in respect of the Procurement and Management of Temporary Accommodation in support of the Council's Housing Association Leasing Scheme (HALS) as required by Contract Standing Orders 88 and 89.
- 1.2 This procurement exercise is designed to retain as well as increase the stock of more settled leased temporary accommodation to help meet demand from homeless households. This will prevent the council having to use poorer quality, more expensive nightly paid temporary accommodation and to enable households to continue to live in Brent.
- 1.3 The proposed contract is anticipated to commence on 1 August 2025 for an acquisition and management period of 3 years, with an option to extend for up to 2 x one year extensions. The contract will continue for a further 3 year

management period following expiry of the acquisition and management period. This will ensure existing properties continue to be managed, even if no new properties are acquired. The value of the contract is £12.6m over 5 years.

2.0 Recommendation(s)

- 2.1 Approve inviting tenders for Procurement and Management of Temporary Accommodation in support of the Council's Housing Association Leasing Scheme (HALS) on the basis of the pre - tender considerations set out in paragraph 4.20 of the report.
- 2.2 Approve Officers evaluating the tenders referred to in 2.1 above on the basis of the evaluation criteria set out in paragraph 4.20 of the report.
- 2.3 Delegate authority to the Corporate Director of Partnerships, Housing and Resident Services, in consultation with the Lead Member for Housing, to award contracts for Procurement and Management of Temporary Accommodation for an acquisition and management term of 3 years, with an option to extend for up to 2 years, and a further management term of 3 years following expiry of the acquisition and management term

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 Increasing the supply of affordable housing is integral to meeting the long-term housing needs of Brent Residents.
- 3.1.2 There is currently an acute shortage of affordable private rented sector accommodation across London which has been falling due to a highly inflated rental market where landlords are able to secure and charge higher rents. This has impacted Brent's ability to gain access to private rented properties in Brent and outside of Brent for discharge of the Council's statutory homeless duties.
- 3.1.3 While the Council has emergency Temporary Accommodation (TA) schemes designed to accommodate statutory homeless households, such as Anansi House and Knowles House, these are already operating at full capacity with very limited potential to move these households into affordable private rented accommodation to end the homeless duty. As a result, alternative accommodation needs to be secured to try to meet current and expected demand.
- 3.1.4 The proposal within this report aligns with one of the Council's ambition to provide safe, secure and decent housing for residents as set out under Strategic Priority 1 'Prosperity and Stability' of the Borough Plan, including addressing rough sleeping by working with partners across the Borough. Other strategies relevant to achieving this strategic priority include the Council's Homelessness and Rough Sleeper Strategy 2020-2025.

4.0 Background

- 4.1 The Council has a statutory duty to provide suitable temporary accommodation to homeless persons who are eligible and in priority need under homelessness legislation. The duty to provide temporary accommodation (TA) usually comes to an end by arranging an offer of either social housing or private rented sector (PRS) housing to end the main homeless duty.
- 4.2 There are currently 1199 households in Stage 1 Emergency TA (Bed and Breakfast and Annexes), out of these 71 are the highest priority in terms of decant, due to cost to the council through TA subsidy loss. The high level of demand from homeless households and lack of affordable accommodation is generating a requirement to provide an unprecedented level of nightly paid Emergency TA.
- 4.3 There is currently an acute shortage of affordable private rented sector accommodation across London which has been falling due to a highly inflated rental market where landlords are able to secure and charge higher rents. This has impacted Brent's ability to gain access to private rented properties in Brent and outside of Brent for discharge of the Council's statutory homeless duties.
- 4.4 While the Council has emergency TA schemes designed to accommodate statutory homeless households, such as Anansi House and Knowles House, these are already operating at full capacity with very limited potential to move these households into affordable private rented accommodation to end the homeless duty. As a result, alternative accommodation needs to be secured to try to meet current and expected demand.
- 4.5 The Council is having to meet its statutory duty to provide Emergency TA at an exponentially increasing cost and with a high-level of reliance on emergency accommodation.
- 4.6 With demand from homeless households increasing and the supply of affordable accommodation decreasing, the pressure to retain and acquire good quality and affordable TA has also increased. The Housing Needs & Support service, working with Housing Supply and Partnerships have a plan to reduce the need for Emergency / Temporary Accommodation by delivering 5000 affordable homes in the borough by 2028. However, there will always be a need for some good quality Temporary Accommodation, and while this will be in the medium term be delivered through council provision, there continues to be a need for Temporary Accommodation and this procurement will help retain the existing stock of HALS units and stop families having to go into Emergency Accommodation.
- 4.7 There are three types of Temporary Accommodation: Bed and Breakfast, Annexes, and more settled leased accommodation, the majority of which is delivered through HALS. Due to the current demand, the overall number of households residing in Bed and Breakfast and Annexes has increased. This is also, in part, due to a reduction in the number of better quality units available through HALS, so there is still a significant reliance on the use of poor quality and expensive nightly paid annexe accommodation.

- 4.8 Annexe accommodation is self-contained, which means the family have exclusive use of a bathroom, toilet and kitchen facilities. However, the majority of the annexe accommodation that is used are en-suite rooms, with a kitchenette in the corner of the room. A key objective of this procurement is to maintain the current levels, and possibly increase the HALS provision so that there is a reduction in the use of nightly paid emergency annexe accommodation.

Current HALS provision

- 4.9 There are 1061 homeless households currently living in leased TA in Brent. Approximately 500 of these households are in a Temporary Accommodation property sourced and managed by the current HALS provider, Notting Hill Genesis Housing Association.
- 4.10 Under the existing and proposed contract, the Registered Provider (RP) sources suitable properties and enter into head leases with the property owners, generally for a 3-year term. The Council is provided with nomination rights to these properties and uses them to accommodate accepted homeless households in settled TA, while they wait for a final offer of either social housing or a Private Rented Sector property to end the main homeless duty. The tenants enter into an assured short hold tenancy with the RP and pay rent (generally via Housing Benefit paid to homeless families).
- 4.11 The RP provides management and maintenance services which are covered by the rent. In line with TA subsidy rules, the weekly rent is calculated using 90% of the January 2011 Local Housing Allowance (LHA) for the size of the property plus an element for management costs (£40 per property per week). In addition, the Council pays a weekly tendered nomination fee to the RP for each property.
- 4.12 The management cost of £40 per week and the nomination fee of £42 per week is covered by Housing Needs & Support's General Funds budget which includes the Council's allocation of Flexible Homelessness Support Grant.
- 4.13 The current contract is due to expire on 31 July 2025 and it is proposed that the new contract will commence on 1 August 2025. However, the provider is still contractually obliged to continue management of their portfolio of properties until lease end.

Impact of not re-procuring

- 4.14 The Council still owes the main rehousing duty to all households living in these properties. If the properties are handed back to the owners, the Council will have a statutory duty to find alternative accommodation for them. Due to the difficulties in securing alternative accommodation, this will most likely result in a move to emergency B&B or hotel annex accommodation which may not be in Brent.

- 4.15 If the council does not re-procure this, it will either need to try and bring those units into the in-house leasing scheme or lose 500 units of good quality, managed and affordable accommodation. The Council still owes the main rehousing duty to all households living in these properties and so as households are evicted due to leases coming to an end, they will require alternative accommodation. Due to the difficulties of securing alternative accommodation, this will most likely result in a move back to poor quality, and expensive emergency B&B or hotel annex accommodation which may or may not be in Brent.
- 4.16 The demand for affordable housing in Brent continues to be one of the major challenges that the Council faces. The HALS TA portfolio is a vital component of the Council's resource in meeting the increased housing demand from homeless households in Brent. This procurement exercise is designed to ensure the retention and provision of good quality, managed and affordable TA properties and thereby reduce the need for high cost nightly paid accommodation.
- 4.17 The procurement sets out to maintain the current service, with no major changes are being proposed to the service. The minimum property standards and furniture standards specified by the Council will be maintained and the contractor has to provide a high-quality housing management service. The scope of services include a full property management service to include property acquisition, viewings and lettings processes, tenancy management, property inspections, administering decants, void periods and property handbacks and performance management. Performance is monitored through performance indicators and regular contract monitoring meetings.
- 4.18 The nomination fee for the service will be determined by this competitive tender. The contract will make provision for the adjustment of the nomination fee to take account of the effects of changes to legislation and benefit rates and arrangements to ensure that value for money and the required supply are maintained.

Procurement

- 4.19 The contracts will be awarded for an initial 3 year management and acquisition period with the potential to grant two x 1 year extension to this period. During the management and acquisition period, the successful Organisations will enter into head leases for new properties and manage those properties. Following expiry of the management and acquisition period the contract will continue for a further 3 year management period. During the management period, the successful RPs will continue to manage the properties with existing head leases but will not enter into new head leases. The Council will have nomination rights in respect of the properties with head leases throughout the full period of the contract (maximum of 8 years).
- 4.20 In accordance with Contract Standing Orders 88 and 89, pre-tender considerations for the procurement of the contract for the construction works

required to deliver the project (the “Contract”) have been set out below for the approval by the Director of Property and Assets.

Ref.	Requirement	Response	
(i)	The nature of the services / supplies / works.	The Provision and Management of Temporary Accommodation Housing Association Leasing Scheme	
(ii)	The estimated value.	£12.6m	
(iii)	The contract term.	3 years with the potential to grant two x 1 year extension to this period.	
(iv)	The tender procedure to be adopted.	Open process	
v)	The procurement timetable.	Indicative dates are:	
		Tender opportunity published	17 th February 2025
		Tender Workshop	24 th February 2025
		Deadline for Tender Submissions	12pm 17 th March 2025
		Evaluation and moderation	18 th March - 9 th April 2025
		Report recommending Contract award circulated internally for comment	10 th April 2025
		Corporate Director in consultation with the Lead Member approval	By 17 th April 2025
		Minimum 10 calendar day standstill period – notification issued to all tenderers and additional debriefing of unsuccessful tenderers (contracts covered by the full requirements of PCR 2015 only)	22 nd April 2025
		Contract Mobilisation	2 nd May– 30 th June 2025
		Contract start date	1st August 2025
(vi)	The evaluation criteria and process.	<ul style="list-style-type: none"> At selection stage, shortlists are to be drawn up in accordance with the Council's Contract Procurement and Management Guidelines by the use of a selection questionnaire to 	

		<p>identify organisations meeting the Council's financial standing requirements, technical capacity and technical expertise.</p> <ul style="list-style-type: none"> At tender evaluation stage, the panel will evaluate the tenders against the following criteria: 50% quality, 10% Social Value and 40% price.
(vii)	Any business risks associated with entering the contract.	There is a risk that the Council may not receive any bids in which case it will either need to try and bring the HALS units into the in-house leasing scheme or lose 500 units of good quality, managed and affordable accommodation.
(viii)	The Council's Best Value duties.	The adoption of an open tendering will enable the council to achieve best value for money.
(ix)	Consideration of Public Services (Social Value) Act 2012	See section 11 below.
(x)	Any staffing implications, including TUPE and pensions.	See section 10 below.
(xi)	The relevant financial, legal and other considerations.	See sections 6 and 7 below.
(xii)	Sustainability	This has been assessed in line with the Procurement Sustainability Policy and determined that a quality measure for sustainability is not required and can be captured as part of the Social Value criteria.
(xiii)	Key Performance Indicators / Outcomes	Appropriate Key Performance Indicators/ Outcomes will be included in the contract.
(xiv)	London Living Wage	The Contract will require the payment of the London Living Wage.
(xv)	Contract Management	This contract has been assessed against the contract segmentation process which determined it is classified as a major contract. A contract manager will be appointed and appropriate contract management provisions will be included in the contract.

5.0 Stakeholder and ward member consultation and engagement

- 5.1 The Cabinet Member for Housing and Resident Support will be kept up to date with the progress of the procurement and contract and relevant ward members will also be kept up to date.

6.0 Financial Considerations

- 6.1 The current HALS contract is estimated to cost the council £2.10m in 2024/25 for 500 properties. The spend for this contract is absorbed within the Housing Needs Budget. The cost of the new contract is estimated to increase by approximately £110k to £2.25m per year for 500 properties.
- 6.2 In line with the TA subsidy rules, the weekly rent is calculated using 90% of the January 2011 Local Housing Allowance (LHA) for the size of the property, which is collected by the RP. The cost to the council is an element of the management costs and a weekly tendered nomination fee to the RP for each property.
- 6.3 The cost of the management fee will remain at £40 per week per property, and the nomination fee is estimated to increase from £42.51 to £46.71 per week per property (including top ups). An amount of £1.4m has been set aside in 2025-26 for inflationary pressures arising from an increase of TA provider costs within the Medium-Term Financial Strategy.
- 6.4 The Council still owes the main rehousing duty to all households living in these properties. If the properties are handed back to the owners, the Council will have a statutory duty to find alternative accommodation for them, this will most likely result in a move to emergency B&B or hotel annex accommodation. Based on the current portfolio, which has one household per property, this would result in approximately £6.1m additional cost to the council.
- 6.5 Any increase in stock will prevent the council having to use poorer quality, more expensive nightly paid temporary accommodation. It is estimated that an additional 60 units will be added to the current portfolio per year, resulting in a £590k per year reduction in spend on B&B providers. The procurement of the additional units is estimated to cost £1.3m across the five years. The anticipated increase in stock is included within the £12.6m contract cost quoted in 4.20.

7.0 Legal Considerations

- 7.1 The estimated value of the Contract is above the threshold for Schedule 3 Services under the Public Procurement Regulations 2015 (the "PCR 2015") and the procurement is therefore governed by the PCR 2015.
- 7.2 The procurement is subject to the Council's own Standing Orders and Financial Regulations in respect of High Value Contracts given the procurement is valued at £12.6M. For High Value Contracts, the Cabinet must approve the pre-tender considerations set out in paragraph [insert] above (Standing Order 89) and the inviting of tenders (Standing Order 88).
- 7.3 In accordance with Recommendation 2.3, once the tendering process is undertaken, Officers will report to the Corporate Director, Partnerships Housing and Resident Services, explaining the process undertaken in tendering the Contract and recommending award.

7.4 As this procurement is subject to the full application of the PCR 2015, the Council must observe the requirements of the mandatory minimum 10 calendar standstill period imposed by the PCR 2015 before the Contract can be awarded.

8.0 Equity, Diversity & Inclusion (EDI) Considerations

8.1 Pursuant to s149 Equality Act 2010 (the “Public Sector Equality Duty”), the Council must, in the exercise of its functions, have due regard to the need to:

- (a) eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act
- (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,

8.2 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.

8.3 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.

8.4 There is no prescribed manner in which the council must exercise its public sector equality duty but having an adequate evidence base for its decision is necessary.

8.5 The proposals in this report have been subject to screening and officers believe that there are no adverse equality implications

9.0 Climate Change and Environmental Considerations

9.1 To ensure that consideration is given to climate change and environment, Officers will endeavour to procure in line with the Sustainable Procurement Policy and to provide within the procurement document, scope for at least one of the Social Value KPIs to be selected from the measures listed under the Cleaner, Greener Brent theme in the Social Value Pro Forma.

9.2 Officers will also provide that the specification for the services to be delivered includes requirement to support individual and collective climate action, in particular climate action that supports households with the cost of living.

10.0 Human Resources/Property Considerations (if appropriate)

10.1 The service will be provided by external contractors and there are no implications for Council staff arising from the procurement or the property implications.

11.0 Public Services (Social Value) Act 2012

11.1 The Council is under a duty pursuant to the Public Services (Social Value) Act 2012 (“the Social Value Act”) to consider how services being procured might improve the economic, social and environmental well-being of its area; how, in conducting the procurement process, the Council might act with a view to securing that improvement; and whether the Council shall undertake consultation.

11.2 Officers have had regard to considerations contained in the Social Value Act in relation to the procurement and 10 per cent of the evaluation score is assigned to social value.

12.0 Communication Considerations

As indicated in paragraph 5 above, Officers will keep all relevant parties informed of progress of the procurement and delivery of the service.

Report sign off:

Peter Gadsdon

Corporate Director of Partnerships, Housing and Resident Services

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Retendering of the Housing Association Leasing Scheme
DEPARTMENT:	Partnerships and Housing
TEAM:	Housing Needs & Support
LEAD OFFICER:	Saleema Nuraney
DATE:	10-01-2025

SECTION A – INITIAL SCREENING

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

This equalities analysis is on the retendering of the Housing Association Leasing Scheme as the current contract expires on 31 Jul 2025. This procurement exercise is designed to retain existing stock and provide a sufficient supply of temporary accommodation (TA) to meet demand from homeless households, to allow the council to move away from the use of expensive and less desirable nightly paid accommodation and to enable the placement of households in or closer to Brent.

The Council has a statutory duty to provide suitable temporary accommodation to homeless persons who are eligible, unintentionally homeless and have a priority need for accommodation under Part VII of the Housing Act 1996 (as amended). The HAL Scheme is used to provide temporary accommodation for homeless families.

There is currently an acute shortage of affordable private rented sector accommodation across London which has been falling due to a highly inflated rental market where landlords are able to secure and charge higher rents. This has impacted Brent's ability to gain access to private rented properties in Brent and outside of Brent for discharge of the Council's statutory homeless duties.

While the Council has emergency Temporary Accommodation (TA) schemes designed to accommodate statutory homeless households, such as Anansi House and Knowles House, these are already operating at full capacity with very limited potential to move these households into affordable private rented accommodation to end the homeless duty. As a result, alternative accommodation needs to be secured to try to meet current and expected demand

The Council contracts with the Housing Associations to source suitable housing for homeless families. The Housing Associations source suitable properties and enter into head leases with the property owners, generally for a 3 year term. The Council is provided with nomination rights in order that the Council can nominate tenants to properties made available by the Housing Associations. The tenants enter into an assured short hold tenancy with the Housing Associations and pay rent (generally via Housing Benefit paid to homeless families). The Housing Associations provide management and maintenance services which are covered by the rent. The Council pays a weekly nomination fee to the relevant Housing Association for each property. There are minimum property standards and furniture standards specified by the Council, and the Housing Associations have to provide a high-quality housing management service. Performance is monitored through performance indicators and regular monitoring meetings.

The principal aim of the HAL scheme is to:

- Continue to meet the housing need for eligible, homeless persons with a priority need for whom the Council has a statutory duty to provide suitable TA under part VII of the Housing Act 1996 (as amended).
- Meet housing need through provision of appropriate affordable housing
- Make best use of leased accommodation to meet housing need
- To specify the affordability thresholds to be complied with by Contractors when setting rents
- Encourage Housing providers to pay full regard to the affordability of TA
- Promote a consistent approach to the letting and management of TA in the borough
- To retain and acquire good quality and affordable TA has also increased

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

The proposed approach is expected to directly benefit homeless families who have approached the Council and are eligible for suitable accommodation. The families are from various ethnic backgrounds and include those who may not have English as their first language as well as those who do.

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. This is a statutory service to meet the needs of homeless people in Brent. They must have "due regard" to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under section 149 of the Equality Act 2010, to advance equality of opportunity and foster good relations between those who have a "protected characteristic" and those who do not share that protected characteristic. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation

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.

<p>The information used for this analysis is taken from the Housing Northgate database as at January 2025 and consists of households currently residing in HALS accommodation over 22/23 and 23/24 which is a total of 549 households.</p>
--

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

Details of impacts identified	<p>Neutral impact. Households will not be discriminated against because of their age. Services can be accessed by adults over 18. 21 responses were blank. Where a response was captured, analysis indicates that the greatest number of main applicants accessing the service are aged between 41 - 50 as they make up 35% of households in HALS TA.</p> <p>21-30 (30 individuals, 6%) 31-40 (133 individuals, 25%) 41-50 (185 individuals, 35%) 51-60 (142 individuals, 27%) 61-91 (38 individuals, 7%)</p>
--------------------------------------	---

DISABILITY

Details of impacts identified	<p>Neutral impact. Households will not be discriminated against because of their disability. The provision of accommodation is based on client need. Where adapted or single level accommodation is required, Providers are informed to procure suitable accommodation. Due to the shortage of adapted properties, preference is given to households who require properties that have been adapted or developed for people with a disability.</p> <p>Of the 455 responses captured, analysis indicates that all applicants 455 applicants stated they did not have a disability in their household. Applicants who have an illness or disability are required to complete a medical form and include as much detail as possible to enable an accurate assessment. Medical priority is awarded following an assessment and recommendation from the Council’s District Medical Officer (DMO). The DMOs recommendations are always taken into consideration before an offer of TA is made to the applicant. If the DMO has made a recommendation for a specific type of property e.g. ground floor or single level access accommodation but where none is available, accommodation with downstairs facilities are sought to meet the applicant’s housing need. This flexible approach is adopted largely due to the difficulties in procuring adapted properties to meet the needs of disabled applicants. Part of the tender evaluation will assess how Housing Associations ensure disabled clients are able to access service.</p> <p>Clients with learning disabilities, mental health issues, sensory or physical impairment are also able to access floating support either through a self referral or through a referral from the Council or the Housing Association.</p>
--------------------------------------	---

	<p>The types of support offered are :</p> <ol style="list-style-type: none"> 1. helping families to access appropriate welfare benefits 2. helping people into education, training and employment 3. support with finding debt-cancelling agencies where applicable 4. support with finding appropriate agencies for physical and mental health needs 5. helping families to keep tenancies and prevent repeated homelessness 6. helping families reintegrate into the community 7. supporting people experiencing domestic violence 8. supporting families with social/cultural issues <p>They are also able to arrange interpreters where necessary and help clients liaise with various service e.g. mental health services, hospitals, GP, social services and schools to name a few.</p>
--	---

RACE

<p>Details of impacts identified</p>	<p>Neutral impact. Households will not be discriminated against because of their race. Brent is one of the most diverse boroughs in London. A sensitive and flexible approach to meeting clients' needs is taken to ensure adequate and suitable provision is made.</p> <p>People from black and minority ethnic communities are more likely to be impacted because they are over-represented among homeless acceptances (compared to the general population).</p> <p>The majority of households who access TA are from BAME households (specifically the Black African community). Of the 294 responses captured, analysis indicates there are 42% of households in HALS TA from the Black community (African, Caribbean, Somalian, Other),</p> <p>42% Black community (African, Caribbean, Somalian, Other) 28% Asian community (Indian, Pakistani, Chinese, Bangladeshi, Other) 12% Any other ethnic background 11% White community (Irish, UK, Other) 4% Mixed 2% Arab community 1% Prefer not to say</p>
---	---

SEX

Details of impacts identified	Neutral impact. Households will not be discriminated against because of their gender. Although the provision of accommodation through the HAL scheme is accessible by both men and women, of the 520 responses captured, analysis indicates that 69% of households in TA are headed by women whereas only are headed by 31% by men.
--------------------------------------	---

SEXUAL ORIENTATION

Details of impacts identified	Neutral impact. Households will not be discriminated against on the basis of their sexual orientation. Unfortunately there is insufficient data on this protected characteristic due to a lack of responses by clients.
--------------------------------------	---

PREGANCY AND MATERNITY

Details of impacts identified	There will be a positive impact on households with children or pregnant mothers as only eligible families with children can access this service. Pregnancy is also classified as a priority need when determining if a household is eligible for assistance under the Housing Act 96 (as amended).
--------------------------------------	--

RELIGION OR BELIEF

Details of impacts identified	<p>Neutral impact. Households will not be discriminated against on the basis of their religion or belief. Of the 76 responses captured, analysis indicates the majority of households are Muslim (39%).</p> <p>40% Muslim 31% no religion/Not stated 26% Christian 3% Other</p>
--------------------------------------	---

GENDER REASSIGNMENT

Details of impacts identified	Neutral impact. We have no data on this protected characteristic Households will not be discriminated against on the basis of gender reassignment. The Provider of the retendered services will be required to provide the council with monitoring data which will be reviewed for any evidence of barriers to access the services.
--------------------------------------	---

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	Neutral impact. We have no data on this protected characteristic. Households will not be discriminated against on the basis of this protected characteristic
--------------------------------------	--

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?

N/A

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?

There will be on-going performance monitoring via quarterly contract meetings held with the Providers and by reviewing their KPIs which are submitted on a monthly basis. The number of complaints will also be used as a monitoring mechanism to ensure customers have been treated fairly and have not experienced discrimination on the basis of any of the protected characteristics. Regular performance monitoring will ensure that the TA scheme does not operate in a manner that disadvantages or discriminates against any particular group

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.

Overall the policy is intended to ensure availability of enough suitable accommodation for homeless households to allow the council to meet its duties at a cost that it can sustain and which are affordable to homeless households, against the background of an increasingly difficult housing market.

The policy is also intended to provide more certain and sustainable outcomes for homeless households and enable them to be accommodated within Brent. The offer of a temporary accommodation will mean that households can move into more settled accommodation that is affordable, enabling them to settle in a neighbourhood, engage with local services and opportunities and plan their futures with more certainty.

No negative impacts have been identified. The positive equality impacts which have been identified will remain due to the eligibility criteria of the households who can access the service.

Brent Council is committed to the principle of equal opportunities in the delivery of all of its services and will seek to ensure that the HAL scheme is applied in a manner that is fair to all sections of the community regardless of their protected characteristic.

Brent Council and its partners will be responsive, accessible and sensitive to the needs of all applicants. They will not tolerate prejudice and discrimination and will actively promote equality.

The contract terms will ensure applicants placed by the Council receive the best possible service in accordance with their individual needs and requirements and there is a clear understanding of the relationship between the Council and the Provider.

The tender process will also include method statements which allow the panel to assess how well the Provider is able to meet our clients' needs. Bidders are required to demonstrate their experience by providing examples of how they will deal with tenancy and housing management issues. The panel will also be assessing Providers to ensure their staff are CRB checked.

The Council will allocate TA in line with Brent's TA Placement Policy which will ensure that everyone's housing need is met in a fair, consistent and non discriminatory manner.

The specification of the HALS contract will ensure that properties procured by Contractors will meet rigorous standards, including adhering to the "minimum property standard" as defined in the HALS specification.

The specification also includes Brent's commitment to Equality and Diversity in Procurement and states clearly the commitment we expect from Provider to promote equality and diversity, taking into account the needs of the people protected under the Equality Act 2010 in respect of the Protected Characteristics.

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.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Saleema Nuraney Private Sector Initiatives and Projects Team Leader	
REVIEWING OFFICER: <i>* the manager with oversight of the project</i>	 Laurence Coaker Director, Housing Needs & Support	14/01/2025
HEAD OF SERVICE / Operational Director:	 Laurence Coaker Director, Housing Needs & Support	14/01/2025

This page is intentionally left blank

By virtue of paragraph(s) 6a, 6b of Part 1 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 6a, 6b of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 6a, 6b of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 6a, 6b of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank