



Cabinet

Monday 13 October 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
Farah	Cabinet Member for Safer Communities, Jobs and Skills
Grahl	Cabinet Member for Children, Young People & Schools
Knight	Cabinet Member for Customer Experience, Resident Support and Culture
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:

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Notes for Members - Declarations of Interest:

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

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

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

***Disclosable Pecuniary Interests:**

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

****Personal Interests:**

The business relates to or affects:

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

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

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

or

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

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

Agenda

Introductions, if appropriate.

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

3	Minutes of the Previous Meeting	1 - 18
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To approve the minutes of the previous meeting held on Monday 8 September 2025 as a correct record.

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

5	Petitions (if any)	
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To receive and consider any petitions for which notice has been provided under Standing Order 66.

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

- (a) Rebuild, renovate, modernise and update Roe Green playground area in Kingsbury Park.
- (b) Addressing the nuisance being caused by pigeons at Network Rail Green Bridge Kilburn Station

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

Finance & Resources reports

7	Q2 Financial Forecast 2025-26	19 - 86
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This report sets 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 2 2025/26.

Ward Affected:
All Wards

Lead Member: Deputy Leader and Cabinet Member for Finance & Resources (Councillor Mili Patel)

Contact Officer: Ravinder Jassar, Deputy Director Corporate and Financial Planning

Tel: 0208 937 1487

ravinder.jassar@brent.gov.uk

Children, Young People and Community Development reports

8 Brent Youth Justice Plan 2025-2028

87 - 180

This report provides an overview of the purpose and rationale for creating the Brent Youth Justice Plan 2025-28. It additionally describes how youth justice provision in Brent contributes to strategic and Borough Plan priorities, and outlines the partnership aims and commitments that will shape the Brent Youth Justice Service (YJS) partnership in the next three years.

Ward Affected:
All Wards

Lead Member: Cabinet Member for Children, Young People & Schools (Councillor Gwen Grahl)

Contact Officer: Serita Kwofie, Head of Early Help

Tel: 020 8937 1747

serita.kwofie@brent.gov.uk

9 Youth Facilities Capital Investment Programme

181 - 190

This report provides a summary of the approach to establishing a programme of capital investment in youth facilities across the borough, in partnership with youth sector providers. The report recommends approval of Strategic Community Infrastructure Levy (SCIL) funding for a number of projects that were shortlisted by a youth panel and designed to offer enhanced youth facilities across the borough and are in, or serve, the boroughs growth areas and areas of deprivation.

Ward Affected:
All Wards

Lead Member: Cabinet Member for Children, Young People & Schools (Councillor Gwen Grahl)

Contact Officer: Serita Kwofie, Head of Early Help

Tel: 020 8937 1747

serita.kwofie@brent.gov.uk

Resident and Housing Services reports

10 Additional HMO Licensing Scheme

191 - 572

This report makes recommendations in relation to designating a new additional HMO licensing scheme to the whole area of the borough with effect from 2 February 2026 or at a later date in accordance with the statutory time required for the scheme to come into force. Details are also provided on the outcome of the consultation process undertaken with landlords, tenants, residents, stakeholders and other interested parties to inform the process.

Ward Affected:
All Wards

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

Contact Officer: Triza Handa, Head of Private
Housing Service
Tel: 020 8937 4037
Triza.Handa@brent.gov.uk

11 **Authority to Proceed with New Energy Efficient Heating for The Oaks and Pharamond** 573 - 582

This report seeks approval to proceed with a project to install energy efficient heating to replace the existing outdated and inefficient system in the Council owned blocks of flats known as The Oaks and Pharamond.

Ward Affected:
Brondesbury
Park;
Roundwood

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

Contact Officer: Spencer Randolph, Director
Housing Services
020 8937 2546
Spencer.Randolph@brent.gov.uk;

Service Reform and Strategy reports

12 **Corporate Performance Update & Q1 Performance Monitoring 2025-26** 583 - 602

This report details the Council's performance in Q1 2025-26, through the Borough Plan performance scorecard and updates against key activities for delivering its priorities and outcomes.

Ward Affected:
All Wards

Lead Member: Cabinet Member for Climate
Action and Community Power (Councillor Jake
Rubin)

Contact Officer: Tom Pickup, Policy and
Performance Manager
Tel: 020 8937 4116
tom.pickup@brent.gov.uk

Neighbourhoods and Regeneration reports

13 **Brent Purpose Built Student Accommodation Planning Position Statement** 603 - 620

This report outlines recent trends for purpose-built student accommodation (PBSA) both delivered and within the pipeline across Brent and seeks approval for publication of a Brent PBSA Planning Position Statement for consultation.

Ward Affected:
All Wards

Lead Member: Cabinet Member for
Regeneration, Planning & Property (Councillor
Teo Benea)

Contact Officer: Paul Lewin, Spatial and
Transportation Planning Manager
020 8937 6710
paul.lewin@brent.gov.uk

14 Exclusion of Press and Public

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

15 Any other urgent business

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

Date of the next meeting: Monday 17 November 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](#)



LONDON BOROUGH OF BRENT

MINUTES OF THE CABINET

Held in the Conference Hall, Brent Civic Centre on Monday 8 September 2025
at 10.00 am

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

Also present: Councillors Dar & Hack (as online participants for item 10)

1. **Apologies for Absence**

Apologies for absence were received from Councillor Mili Patel (Deputy Leader and Cabinet Member for Finance & Resources).

Councillor Muhammed Butt (as Leader of the Council) also took the opportunity to welcome Jehan Weerasinghe to his first Cabinet meeting as the newly appointed Corporate Director Neighbourhoods & Regeneration.

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 28 July 2025 be approved as a correct record of the meeting.

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

None identified.

5. **Petitions (if any)**

There were no petitions 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. **Change in order of Business**

Councillor Muhammed Butt (as Chair) advised that as he had accepted requests to speak in relation to Agenda Item 7 (Developing a new Brent Gypsy, Roma & Traveller Strategy), Agenda Item 9 (Relocation of Islamia Primary School) and Agenda Item 10 (2025-26 Neighbourhood Community Infrastructure Levy (NCIL)

Projects over £100k) he intended to change the order of the agenda to enable Item 9 and 10 to be considered following Agenda Item 7.

The minutes therefore reflect the order in which items were considered at the meeting.

8. Developing a new Brent Gypsy, Roma & Traveller Strategy

Prior to considering the report, Councillor Muhammed Butt (as Leader of the Council) welcomed Mr John O'Donnell (speaking on behalf of residents from the Lynton Close Travellers site) who was accompanied by Nancy Hawker (London Gypsy & Travellers Association) to the meeting who he advised had requested to speak in relation to the investment in Lynton Close site improvements, rent arrangements, search for additional Traveller sites in Brent and new allocations policy referred to as part of the proposed Strategy being presented for consideration.

In addressing Cabinet, Mr John O'Donnell began by highlighting the progress made in terms of the relationship between residents on the Lynton Close Travellers site and Council and efforts made to ensure the site remained opened, including the installation of heat detector fire alarms and identification of funding and land to support further improvements to address overcrowding. In expressing support for the proposals within the strategy, Mr O'Donnell outlined a number of questions on which additional assurance was being sought as part of the ongoing plans relating to the Lynton Road site, which were as follows:

- (1) Written confirmation was sought that the eviction process had now been paused, following the issuing of original notices to residents on the site.
- (2) The potential for families to remain on the Lynton Close until new sites were available along with the availability of a deadline for the process to identify and deliver the new sites.
- (3) The plans to provide enough sites/plots to accommodate all the residents that had been required to move off Lynton Close due to the fire hazards identified.
- (4) The deadline for refurbishment of Lynton Close being completed along with timescale for recruitment and appointment of the Lynton Close site manager (including an outline of the job description).

In responding to the comments and questions raised, Councillor Donnelly-Jackson (as Cabinet Member for Housing) also welcomed the more positive and meaningful process of engagement with the Traveller community at Lynton Close and highlighted the Council's commitment to celebrating diversity and ensuring Brent remained an inclusive place for all communities.

As part of this approach, reference was made to the work undertaken with residents on the Lynton Close Traveller Site to address overcrowding and fire safety risks, alongside the clearance of unwanted bulky waste, a dilapidated playground and portacabins that were no longer fit for purpose. It was pointed out these efforts had also been supported by a series of resident meetings (chaired by the Council's Chief Executive) covering a range of wider issues, which had also resulted in the

organisation of two community support days involving teams from the Council's Housing, Brent Health Matters, Hubs and Council Tax services with residents (along with the wider community) being kept updated through regular, accessible communications.

Turning to development of the new Strategy, it was highlighted that this reflected the engagement undertaken to date in partnership with Gypsy, Roma, and Traveller communities underpinned by an understanding of the needs being identified. In developing the proposals and working to improve engagement, it was highlighted that the Council had also involved interest groups like London Gypsy & Travellers Association as well as other local authorities to ensure the approach outlined was based on recognised best practice.

As part of the process of engagement and in seeking to develop a better understanding of need, it was recognised that the Irish Traveller community had highlighted access to suitable accommodation and the opportunity to meaningfully shape support services as important in supporting residents' health and wellbeing, as well as their ability to thrive in education and employment with data from the latest Census and other sources also supporting the need to improve outcomes in these areas. This had also resulted in additional cross Council work being undertaken to ensure ownership and consistency in the approach being developed with the aim being to not only improve communication but also engage and listen, enabling residents (with the Council's support) to shape their futures as well as increase wellbeing and reduce marginalisation and stigma.

In terms of the questions which had been raised, an assurance was provided that these would be responded following the meeting with initial confirmation provided that the liaison role for the Lynton Close site was already in the process of being recruited. In support of the response provided, Tom Cattermole (Corporate Director of Residents & Housing Services) also took the opportunity to provide assurance regarding the identification of funding to support development of the strategy and proposals relating to the Lynton Close Travellers Site with work continuing at pace in relation to delivery.

Having thanked Mr O'Donnell and Nancy Hawker for their attendance and representations made at the meeting, the Leader then invited Councillor Donnelly-Jackson to formally introduce the report from the Corporate Director of Residents & Housing Services outlining the Council's approach towards developing a new Brent Gypsy, Roma & Traveller Strategy along with the progress made in developing specific components of the strategy including a new Pitch Allocation Policy, search for new sites and plans to reduce pitch rent at Lynton Close as part of the Council's ambitions and commitments to the Gypsy, Roma & Travellers communities.

In presenting the report Councillor Donnelly-Jackson once again welcomed the more positive and meaningful process of engagement with the Traveller community at Lynton Close along with the progress made in addressing fire safety issues on the site. In terms of the report presented for consideration at the meeting, it was highlighted that this reflected the commitment to continue seeking to improve on a longer term basis not only in terms of the Traveller community at Lynton Close, but also in terms of the wider Gypsy Roma and Traveller communities within the borough, with the objective to not only listen, and engage but also to work to understand Gypsy Traveller and Roma residents' needs, and shape services in

order to meet them. In addition to the work undertaken to address the fire safety risks on the Lynton Close site Councillor Donnelly-Jackson advised she was also pleased to report on the work undertaken following feedback from residents to clear unwanted waste along with structures that were no longer fit for purpose as well as hold two Community Support Days supported by a series of resident meetings (chaired by the Council's Chief Executive).

Turning to development of the new Strategy, this was also felt to underline the Council's commitment to ongoing collaboration, through the development of a new Pitch Allocation Policy, aimed at creating a transparent and fair system for allocating pitches on permanent and temporary sites; proposed reduction in weekly pitch rent at Lynton Close Traveller Site (to bring charges in line with the London average, in an effort to prevent residents getting into debt); proposed investment of up to £500,000 for site improvements at Lynton Close, with a commitment to allowing residents to shape how the funds were used; consultation on a new long-term strategy for Gypsy, Roma, and Traveller communities and ongoing work to identify new sites to tackle overcrowding on Lynton Close working closely with the community to understand their needs.

In highlighting the Council's ongoing commitment to listen, Councillor Donnelly-Jackson ended by advising of the ongoing need to continue working to reduce marginalisation of the Gypsy, Roma & Traveller communities in order to improve their wellbeing and shape future services to better meet their needs.

In considering the report, Cabinet welcomed the approach outlined in terms of the development of the Strategy and key components included in seeking to provide a clear framework and build stronger and more sustainable relationships with the Gypsy, Roma and Traveller communities across Brent whilst also addressing the challenges identified by residents located on the traveller site at Lynton Close.

In recognising and supporting the efforts being made to continue and develop the process of engagement and in seeking to provide the foundation for a fairer future designed to enable Gypsy, Roma and Traveller communities to flourish in Brent Cabinet **RESOLVED**, having noted that progress in the development and delivery of the Strategy would remain under ongoing review, to:

- (1) Endorse the proposed direction of travel to develop the Gypsy, Roma & Traveller Strategy. This included:
 - The skeleton outlined in paragraph 3.2.5 of the report.
 - The consultation and engagement approach as captured in paragraphs 3.2.24 – 3.2.27 and detailed within Appendix A of the report.
- (2) To note progress made, and endorse next steps to develop key components of the strategy (as detailed in 3.2.10 – 3.2.23 of the report), including:
 - Draft Pitch Allocation Policy as detailed in Appendix B of the report.
 - Site search – with a report detailing to be provided for Cabinet in 2026.

- Site management approach.
- (3) To endorse the use of up to c.£500,000 capital investment from 2026/27 through the usual capital governance processes (Capital Programme Board and Cabinet) for site improvements as part of our improved approach to site management. This would be invested in priorities identified through consultation and engagement with the residents.
 - (4) To endorse a reduction in the weekly pitch rate from £185.13 to £138.96.

9. **Relocation of Islamia Primary School**

Prior to considering the report, Councillor Muhammed Butt (as Leader of the Council) welcomed Jitu Patel (as Chair of the Board of Trustees representing BAPS Shri Swaminarayan Mandir - Neasden Temple) accompanied by Girish Patel (as a separate Trustee) and Zafar Ashraf (Executive Director - Yusuf Islam Foundation) to the meeting who he advised had requested to speak in advance of the proposals on the relocation of Islamia Primary School being considered by Cabinet.

In highlighting the position of the Board of Trustees representing BAPS Shri Swaminarayan Mandir (Neasden Temple) Jitu Patel, as the first representative to speak, outlined their interest in the Gwenneth Rickus site as a key component in a long-term vision for the area highlighting their status as a leading Hindu organisation which represented all members of the UK Hindu community and which already owned a large part of the surrounding estate including The Swaminarayan School and the 'Tennis Courts' which adjoined the Gwenneth Rickus site. Having highlighted the interest expressed in acquiring the Gwenneth Rickus site, should it become available, over many years Jitu Patel advised the Board of Trustees had therefore been disappointed about the notice provided in relation to the proposed transfer of the site to the Yusuf Islam Foundation. In light of that, the Board had made detailed representations in response to the statutory consultation along with the submission of an alternative offer to acquire the site from Brent Council and grant a medium-term lease to Islamia School with the Board of Trustees disappointed that despite the representations made these had not been accepted for consideration. In recognising the strong nature of the relationship established with the leadership of both Brent Council and the Yusuf Islam Foundation, the Board had therefore sought to continue proactively engaging with all parties in a way that sought to respect and acknowledge the obligations and aspirations of each organisation and agree a solution that would represent a favourable outcome for all concerned.

In outlining the Board's original proposal, Jitu Patel advised that if Cabinet were minded to proceed with the transfer of the site to the Yusuf Islam Foundation, this should at the very least consider as an alternative the inclusion of a mechanism allowing for possible future acquisition of the site by BAPS, should it no longer be required for educational purposes, (subject to the necessary legal consents being obtained). In seeking a way forward, it was hoped Cabinet would therefore consider deferring a final decision to enable more detailed consideration of the alternative proposal outlined, with it confirmed that the Board of Trustees remained committed to working collaboratively with the Council and the Yusuf Islam Foundation to create a model of co-operation, and to promote and protect faith-based educational provision and community use.

Having thanked Jitu Patel for the representations made on behalf of the Board of Trustees BAPS Shri Swaminarayan Mandir (Neasden Temple), Councillor Muhammed Butt then welcomed Zafar Ashraf (Executive Director - Yusuf Islam Foundation) to the meeting who he advised had also asked to speak in advance of the report being considered.

In terms of the position outlined on behalf of the Yusuf Islam Foundation, Zafar Ashraf began by reminding members of the long running and extensive work undertaken to identify options for future provision of Islamia Primary School (as the only Muslim faith voluntary aided school in the borough) with the proposal, as set out in the report, therefore supported as a viable solution that would meet the needs and approval of key stakeholders. Whilst aware of issues raised by the Board of Trustees representing BAPS Shri Swaminarayan Mandir it was felt that these could be addressed working in collaboration including an invitation for a representative of the Board to join the Schools Governing Body as a Foundation Governor and confirmation that the new premises (subject to approval) would be made available for local community use outside of school hours. Confirmation was also provided that the Foundation would be willing to engage with the Shri Swaminarayan Mandir regarding any needs they may have in this respect, and on this basis the Foundation hoped that Cabinet would be willing to accept the proposal to relocate the school as recommended.

In thanking Zafar Ashraf and Jitu Patel for their comments, Councillor Muhammed Butt assured both that the issues raised would be taken into account during consideration of the report. Councillor Grahl was then invited to formally introduce the report from the Corporate Director Children, Young People and Community Development, which provided a summary of the informal and formal consultation undertaken by the Governing Body of Islamia Primary School (IPS) in relation to the schools proposed relocation to the Gwenneth Rickus site on Brentfield Road as a 2 Form Entry (2FE) school from September 2027.

In presenting the report, Councillor Grahl began by acknowledging Islamia Primary School's status as Brent's only Muslim state funded primary school along with the long running efforts made to secure a new home for the school, recognising the uncertainty faced since receipt of the eviction notice from its current site on Salusbury Road. Members were reminded that that school currently served over 400 pupils and remained oversubscribed with a long history of serving the community across Brent and the wider region and without action being taken would face closure. As a result, it was pointed out the proposals presented for consideration had been designed to address the uncertainty and ensure Islamia Primary School could continue to thrive at a new home on the Gwenneth Rickus site from September 2027 with, it was felt, a clear case having been outlined in support of relocation.

Members were advised this had involved parents, staff and residents having identified the current split site arrangement as being overcrowded and unsuitable with limited outdoor space and facilities that were recognised as falling short of modern standards. In contrast, it was pointed out the proposed move to the Gwenneth Rickus site would offer access to purpose built classrooms, more space for play and sport as well as improved provision for children with special

educational needs in order to provide the schools pupils with a safe, high-quality environment.

In highlighting that the Gwenneth Rickus site had become available in 2027 due to falling pupil numbers in the area and recognising the significant catchment area of Islamia Primary School, the approach identified in terms of the relocation proposals was also felt to demonstrate the Council's focus in seeking to use its assets as wisely as possible and to make best use of available space and facilities, whilst also protecting educational choice for families in Brent, strengthening the diversity of the school system and supporting the borough wide priority of giving every child the best start in life.

Reference was also made to the thorough nature and outcome of the informal and formal consultation process relating to the proposed relocation, which had resulted in support being expressed from families and the wider community highlighting the move as long overdue and with parents also supportive of the way in which the new site would bring children together under one roof, improve learning conditions and safeguard the unique educational offer of the school. At the same time, however, it was also recognised that concerns had been raised, on which the Council would continue to listen, with a commitment provided to continue working with local schools, residents and community groups to manage the impact of the relocation, from travel and traffic issues to community cohesion in an effort to continue building stronger communities through dialogue and partnership.

Councillor Grahl also felt it important to acknowledge the representations made in advance of the report being considered on behalf of the Board of Trustees representing BAPS Shri Swaminarayan Mandir - Neasden Temple, with the opportunity highlighted for these to be considered as part of the wider regeneration proposals being developed across the Neasden area, whilst also recognising the nature of the Gwenneth Rickus site as a valuable educational asset which the proposals had been designed to secure the continued use of. As such the proposals outlined in the report were felt to demonstrate the Council taking responsibility and acting decisively to protect and secure the future of a popular school ensuring that both current and future pupils were able to continue benefiting from the education it was able to provide, with the Council also committed to working with the wider community (including BAPS Shri Swaminarayan Mandir-Neasden Temple) in order to ensure a successful relocation of the school in a way that would also strengthen community cohesion.

Following on, Nigel Chapman (Corporate Director for Children, Young People and Community Development) also took the opportunity to welcome the collaborative approach outlined by the Yusuf Islam Foundation in seeking to work with the Board of Trustees at BAPS Shri Swaminarayan Mandir - Neasden Temple including the offer of a position on the School Governing Body and wider use of the premises for local community use outside of school hours. Concerns which had been raised by local schools in the area surrounding the site regarding the potential destabilising impact on pupil numbers were also acknowledged, although it was felt these were not likely to materialise given the much wider catchment area covered by Islamia Primary School. An assurance was, however, provided that demand for school places in the Primary Planning area would continue to be monitored and addressed as part of the School Place Planning Strategy.

Technical advice and assurance was also sought from officers at the meeting regarding the issues raised as part of the representations received in relation to future use of the site, should it no longer be required for educational purposes and alignment with Brents Borough Plan, Local & London Plan policies as part of any wider regeneration and development of land surrounding the Neasden Temple complex. In clarifying the legal position regarding the proposed relocation of the school and transfer of the site, it was noted that this had complied with the necessary statutory provisions with it not possible to provide any commitment about future use of the site, should it no longer be required for education purposes, on the basis that any disposal of the land would need to be considered and made in accordance with the relevant statutory processes. Confirmation was also provided that the proposed relocation of the school had been subject to all necessary statutory processes enabling a final decision to be taken by Cabinet and reflecting the statutory duty on the Council to ensure there were sufficient school places available to meet the needs of the local population. In terms of the wider conceptual masterplan which had been referred to by the Board of Trustees in relation to development of the area surrounding the Temple, members were advised these proposals would need to be considered as part of the standard masterplan development process involving engagement with key stakeholders (including the Temple) and assessment against the relevant planning policy framework.

In considering the report, members recognised the extensive nature of the process undertaken in seeking to identify a suitable site for relocation of the school and balance needing to be maintained in seeking to secure the future of the school whilst also maintaining a strong sense of community cohesion through a process of collaboration and inclusive engagement. In welcoming the approach outlined as a means of removing the uncertainty and securing the ongoing provision of the school and in recognising the schools existing site as no longer fit for purpose, members were also keen to ensure that work continued to encourage the Yusuf Islam Foundation, Temple and other local stakeholders to work collaboratively in seeking to develop a strong relationship in support of the wider community benefit including areas such as development of an active travel plan for pupils accessing the new site.

In taking the opportunity to thank all officers for their efforts in development of the proposals and once again recognising the exhaustive nature of the process undertaken in seeking to identify a suitable site for relocation of the school alongside the representations received, contents of the report, outcome of the consultation and technical advice provided during the meeting regarding the issues raised as part of the representations received, Cabinet **RESOLVED:**

- (1) To note the outcome and analysis from the formal consultation.
- (2) To approve the proposal to relocate Islamia Primary School to the Gwenneth Rickus site on Brentfield Road as a 2FE school from 1st September 2027.
- (3) To note that the Gwenneth Rickus site would be transferred into the name of the Yusuf Islam Foundation, who would be required to hold the site for the benefit of the Islamia Primary School. Further details in terms of ownership would be set out in a Trust Deed. This would ensure that the primary school would be protected from eviction in future.

10. **2025-26 Neighbourhood Community Infrastructure Levy (NCIL) - Projects over £100k**

Prior to considering the report, Councillor Muhammed Butt (as Leader of the Council) advised that he accepted a joint request to speak at the meeting from Councillors Hack & Dar in support of the Brent Beats and Roots project recommended for inclusion within the proposals set out in the report.

Addressing the meeting as online participants, Councillors Hack and Dar outlined their support of the Brent Beats and Roots project which had been recommended for inclusion as one of the projects for funding, recognising the community driven nature of the cultural initiatives outlined and specific focus within Cricklewood in celebrating the borough's Irish Heritage as a means of creating a vibrant celebration of Brent's musical legacy, cultural diversity and public spaces.

Having thanked both councillors for their comments in support of the scheme, Councillor Muhammed Butt (as Leader of the Council) then invited Councillor Rubin (as Cabinet Member for Climate Action and Community Power) to introduce the report from the Corporate Director Service Reform & Strategy detailing the projects which had been recommended to receive Neighbourhood Community Infrastructure Levy (NCIL) funding awards over £100k in value. The report also outlined the recommended projects that required a capital funding contribution, for which approval to the capital budget allocation was also being sought, as well as detailing the projects under £100k which had been approved under delegated authority (in accordance with the process approved by Cabinet in June 2025).

In presenting the report, Cabinet was advised that the £5 million investment programme outlined within the report reflected the new approach adopted towards the distribution and allocation of NCIL funding. Recognising the opportunity provided to respond directly to the priorities being highlighted by residents and focus on fairness in relation to the NCIL process, the approach adopted was also identified as reflecting the benefits of local development in terms of providing a means to reinvest in the everyday services and spaces that mattered most to residents. Members were reminded that the programme of proposed investment would cover each Brent Connects area and included a focus on investment that would deliver cleaner streets, greener spaces, safer neighbourhoods, and renewed opportunities for culture, learning, and community life.

In highlighting key elements of the programme, members were advised that it included over 60 individual projects with schemes designed to deliver around £1m of investment into cleaner, safer neighbourhoods through expanded patrols, new street bins, pothole repairs, and secure cycle parking and over £1.5m of investment into greener spaces, including major tree planting, new rain gardens, and green corridor schemes in Church End and Kingsbury. Other projects included almost £600,000 to support communities directly, with cost-of-living programmes, new learning spaces, and initiatives designed to make a real difference to families alongside over £200,000 into culture and identity through Brent Beats & Roots, as a borough-wide celebration of Brent's unique music and cultural heritage (for which the support expressed by Councillor Hack and Dar was welcomed) and more than £200,000 for community safety, including new patrols and targeted crime-reduction projects.

Taken together, it was felt the projects identified would transform the everyday experience of living in Brent enabling work to continue in tackling the impact of austerity, investing in shared spaces and restoring pride in the borough.

Members in welcoming and commending the proposed use of NCIL funding and investment programme outlined within the report, were keen to recognise and support the focus included on projects designed to benefit local communities in terms of not only enhancing the borough's public realm, physical infrastructure (including parks and green spaces) and cultural and heritage offer but also in seeking to address demand identified in relation to cost-of-living pressures, supporting employment and that would contribute towards the delivery of safer neighbourhoods through the tackling of crime and anti-social behaviour.

In acknowledging the extent of the proposed investment, which it was noted would also include a project focussed around the Freeman Family Centre as well as support for cycle and other active travel measures, members also commended the success achieved in terms of the generation and collection of CIL receipts, which was recognised as a further benefit of the efforts being made to deliver the ambitious programme of regeneration across Brent.

In support of the approach towards the use of NCIL and thanking all those involved for their focus in seeking to bring forward and deliver at pace the investment programme outlined, Cabinet **RESOLVED**:

- (1) To approve the projects set out in Appendix A of the report for NCIL funding.
- (2) To note the projects that required a capital budget requirement as set out in Appendix A and Appendix B of the report.
- (3) To approve a capital budget funded from NCIL totalling £5,088,231.
- (4) To note the projects in Appendix B that had been approved under delegated authority by the Corporate Director Service Reform and Strategy.

11. Inter Authority Agreement - Brent, Barnet, Harrow Mortuary Service

Councillor Knight (as Cabinet Member for Customer Experience, Resident Support & Culture) introduced a report from the Corporate Director Resident & Housing Services seeking approval for the continuation of a shared service arrangement with Barnet and Harrow Council's for operation of the public mortuary service located within the grounds of Northwick Park Hospital (under the jurisdiction of the North London Coroner) and for Brent to enter a new Inter Authority Agreement (IAA) covering the shared service arrangement.

In presenting the report, members were reminded of the deeply human as well as statutory nature of the service given the importance in ensuring a focus on treating people with dignity and respect (often at the most difficult of times) and doing so in a way that reflected the longstanding values of compassion, efficiency and fairness. In recognition of the fact that Brent, Harrow and Barnet Council's served one of the most diverse communities in the country, the opportunity was also taken to outline the way in which the service had been shaped to respect cultural and religious

traditions across all communities, which it was noted had been reflected within the new agreement presented as the basis for continuation of the current service.

Members were also reminded of the mortuary's role as the designated disaster mortuary for North London, with the agreement ensuring that in the event of a major incident the necessary infrastructure would be in place to respond swiftly and with professionalism. As further progress, members were reminded that under Brent's leadership a major refurbishment of the facility was also underway designed to extend capacity by 2027, including not only refrigerated and freezer spaces but much needed bariatric units designed to provide future resilience on a forward planned basis. The approach outlined was also, from a financial and value for money perspective, highlighted as an example of councils working together to deliver better outcomes at lower cost involving the shared pooling of costs and resources (as opposed to each borough facing rising infrastructure bills alone) and with the facility being maintained at a peppercorn rent lease until 2080, which it was felt represented an efficient and prudent use of public resource.

Highlighting the approach outlined as reflecting best practice in terms of collaboration, innovation and delivering for people in ways that were both compassionate and financially sustainable it was felt (in commending the report to Cabinet) that members should take pride in the fact that Brent had led the partnership from the very beginning with the leadership provided making the service one of the most respected of its kind in London.

In acknowledging the professionalism, expertise and quality in terms of the mortuary service being provided and benefits outlined in relation to the proactive and collaborative nature of the cross borough approach identified (under the leadership of Brent) in relation to future resilience and efficiency whilst also seeking to build on the outcome of the most recent Human Tissue Authority inspection of the service and maintain the highest standards of care, Cabinet **RESOLVED:**

- (1) To agree that a public mortuary service should continue to be provided by Brent Council at Northwick Park on behalf of Brent, Barnet and Harrow Councils.
- (2) To delegate authority to the Corporate Director of Residents and Housing Services in consultation with the Director Law (Chief Legal Officer) and Corporate Director Finance & Resources (Chief Finance Officer) to agree and finalise the terms of the Inter Authority Agreement (as outlined within Appendix 1 of the report), and to take all necessary action to implement the proposed shared service arrangement.

12. **Tri-Borough Leisure Contract Procurement**

Councillor Nerva (as Cabinet Member for Adult Social Care, Public Health & Leisure) introduced a report from the Corporate Director Service Reform and Strategy seeking approval for Brent to withdraw from the current Tri-Borough leisure procurement with Ealing and Harrow and commence a standalone procurement for Vale Farm Sports Centre based on a five-year agency agreement.

In introducing the report, members were advised of the key objective in terms of the approach outlined which had been designed to ensure residents would retain

access to high quality leisure services while also enabling Brent to take control of the procurement process in terms of future delivery. Reflecting on the previous decision taken in 2024 to participate in a Tri Borough procurement with Harrow and Ealing for the provision at Vale Farm Leisure Centre, Cabinet was reminded this had been felt to represent the best option at the time in terms of achieving the required economies of scale. In developing the process, however, members were advised it had become clear that the Tri Borough approach for the specific nature of service being sought would not provide Brent with the certainty or flexibility required given the barriers the contract would present in enabling the Council to bring together all of its major leisure sites from 2031, linked to the Willesden PFI coming to an end and new Bridge Park facility being opened and limited control over pricing, programming and investment in Council facilities.

As a result, the revised approach presented had sought a different pathway with it recommended that the Council consider withdrawing from the Tri Borough process and running its own standalone procurement for Vale Farm Sports Centre in a way that would not only secure continuity of service from 2026 but also strengthen local control over price, programming and investment. Members were advised that, subject to approval, the new contract would be based on a five-year agency agreement designed to keep future options open while providing certainty over current provision and also representing the first step towards delivery of a single, borough wide Active Wellbeing model from 2031.

The adoption of the agency model approach was also highlighted as being able to deliver additional benefits to residents in terms of greater oversight of income and costs, and a clearer line of sight on reinvestment with the example provided of funding secured from Sport England to install solar panels at Vale Farm as a demonstration of the kind of practical improvement it was felt a Brent led approach would be able to deliver. As further assurance in support of the move towards a broader Active Wellbeing approach, members were advised that the approach would also involve use of the Strategic Outcomes Planning Model (SOPM), including Sport England's Leisure Services Delivery Guidance (LSDG) in order to provide further evidence and ensure all future delivery models (including insourcing) could be fully appraised enabling Members to take an informed decision on the best long-term operating model from 2031 for Brent's residents and communities.

In considering the report, members welcomed the approach outlined as a means of not only ensuring continuity of service but also strengthening local control and in supporting the move towards a transformation in how leisure and wellbeing was being delivered across the borough alongside an assessment of longer-term options in terms for future provision.

Having thanked all officers involved for their support in developing the revised approach outlined Cabinet **RESOLVED:**

- (1) To approve withdrawing Brent from the current Tri-Borough leisure procurement with Ealing and Harrow.
- (2) To commence a standalone procurement for Vale Farm Sports Centre, based on a five-year agency agreement model until 2031.

- (3) To delegate authority to the Corporate Director of Service Reform and Strategy, in consultation with the Cabinet Member for Adult Social Care, Public Health and Leisure, to finalise the procurement process and award the contract, subject to legal advice and the Council's governance procedures.

13. Council Homes Acquisition Programme Delivery

Councillor Benea (as Cabinet Member for Regeneration, Planning & Property) introduced a report from the Corporate Director Neighbourhoods & Regeneration seeking approval to proceed with the Council Homes Acquisition Programme (CHAP) for which a Greater London Authority (GLA) grant of up to £1.8m had been secured, including authority to complete the contracts for the acquisition of up to 15 properties by 31 March 2026 or thereafter, subject to the relevant agreements having been obtained.

In presenting the report, Cabinet was advised of the focus in seeking to take forward the next phase in the Council's Council Homes Acquisition Programme with Brent, as part of the GLA's Affordable Homes Programme, having secured £1.8m of grant funding to acquire up to 15 properties for use as good-quality temporary accommodation. Although recognising the modest number this represented within the overall context of London's housing crisis the importance of the transformational impact on those families able to benefit from the properties being acquired was also highlighted in terms of supporting their move from hotel and B&B accommodation into more stable and secure homes.

Whilst recognising the scale of homelessness in London and impact on Brent the opportunity was also taken to remind members of the ongoing approach being taken by the Council to confront the housing crisis guided through the Borough Plan pledge to deliver 5,000 genuinely affordable homes by 2028, including 1,700 directly delivered by the Council. Alongside new-build schemes members were also reminded of the vital role and importance of acquisitions in delivering the safe and secure homes required whilst also reducing the cost pressures of relying on the private market and ensuring that vulnerable families could be supported with dignity and respect.

In welcoming and supporting the ongoing efforts being made to tackle homelessness and to keep investing in the homes so urgently need, members were also keen to commend the work undertaken with the GLA in order to secure the required uplift in the Council Homes Acquisitions Programme grant rate, which had enable the acquisition programme to proceed as a viable option recognising the impact this would have in supporting the provision of good quality temporary accommodation for families in need and in reducing associated cost pressures. The opportunity was also taken to highlight the impact of the lobbying also being undertaken in support of the Renters Reform Bill as an additional measure in relation to addressing the housing crisis focussed on challenges within the private rented sector.

Recognising the positive nature of the measures outlined in seeking to utilise all forms of available funding Cabinet **RESOLVED**, having noted the information contained within the exempt appendix of the report:

- (1) To approve delivery of the Council's Council Homes Acquisition Programme (CHAP) to acquire 15 homes for temporary accommodation.
- (2) To approve the total capital budget of £11,733,750 required to complete the acquisition and refurbishment of 15 properties.
- (3) To delegate authority to the Director, Property & Assets, in consultation with the Cabinet Member for Regeneration, Planning and Property to complete the acquisition of purchases above £1m.

14. Brent Development Plan Documents Review

Councillor Benea (as Cabinet Member for Regeneration, Planning & Property) introduced a report from the Corporate Director Neighbourhoods & Regeneration regarding the provision of additional budget to support the review of the Brent Local Plan and seeking approval for the necessary delegations to address the stages prior to submission of development plans for examination.

In introducing the report, Cabinet noted the vital importance of the Local Plan in terms the framework provided to guide new development across the borough in order to ensure that it was able to deliver the homes, infrastructure and spaces needed reflecting current challenges whilst also protecting the character of the area. As such, the need to ensure the Plan remained current and avoided becoming out of date was highlighted as a key consideration in any review to avoid shifting power away from local decision makers and the loss of the associated protection for local residents.

In recognising the impact over recent years of building safety rules, viability pressures and the challenging housing market, the Council was therefore seeking to act proactively in terms of the timing of the review. Members were advised that by acting now the Council would ensure it had the tools required to help shape growth positively, fairly and sustainably for decades to come and in a way that was able to respond to continued population growth in a sustainable way, providing new homes, particularly affordable ones, while protecting Brent's businesses, enhancing green spaces and ensuring Brent's rich heritage continued to be safeguarded.

As an additional element, it was pointed out the review would also enable the Council to strengthen its response to the climate emergency, embedding higher environmental standards and supporting the ambition to be carbon neutral by 2030 whilst also providing the ability to strengthen policy where residents had raised concerns, whether that was limiting the over concentration of student accommodation or tackling the gambling harms linked to adult gaming centres.

In seeking to tackle the housing crisis, members were reminded that Brent had over recent years delivered more homes than almost any other borough in the capital with Councillor Benea outlining the determination to go further. Whilst supporting the delivery of national housing targets, members were, however, assured that the approach would be based on a plan developed for Brent to ensure growth and development was targeted in the right places, around transport hubs and growth areas enabling new schools, parks, GP surgeries and other associated infrastructure to also be delivered in a way designed to use available land responsibly while protecting the character of the borough.

In addressing concerns regarding the scale and density of development, including the use of taller buildings, members were advised of the way in which the Plan was also designed to ensure the type of development reflected the nature and status of an area, including those designated as growth areas, enabling them to be matched with supporting infrastructure and also employment opportunities.

In recognising the focus of the review around responsibility, ambition and fairness members welcomed the approach outlined as a means of ensuring the Council retained the necessary tools to plan for the future not only in relation to meeting housing need but also protection of the borough's heritage, social and cultural infrastructure and in seeking to safeguard its environmental and economic infrastructure whilst also strengthen community life. On this basis Cabinet **RESOLVED:**

- (1) To approve £880,000 to be added to the Local Plan budget reserve to be used for the processes to support delivery of a review of the development plan documents.
- (2) To delegate authority to the Corporate Director Neighbourhoods and Regeneration in consultation with the Cabinet Member Regeneration, Planning and Property to approve Development Plan consultation material to be issued in the stages prior to any final draft plan proposed to be submitted for examination.

15. Complaints Annual Report 2024 - 2025

In Councillor Mili Patel's absence (as Deputy Leader and Cabinet Member for Finance & Resources), Councillor Muhammed Butt (as Leader of the Council) introduced a report from the Corporate Director Finance & Resources detailing the Council's complaints performance for the period 1 April 2024 to 31 March 2025. The report focused on the nature of complaints and the learning they could provide to inform Brent Council's future approach to service improvement as well as including details on complaints performance relating to Adult Social Care and Children's Social Care, as detailed in Appendices A & B of the report, which it was noted were governed by separate statutory complaint procedures. Members noted the report also contained (as Appendix C) a comparison of the Council's performance with other London boroughs provided by the Local Government and Social Care Ombudsman alongside the Council's Housing Management Service Annual Complaints Performance and Service Improvement Report for 2024-2025 (Appendix D) which was now a requirement of the Housing Ombudsman's Complaint Handling Code.

Cabinet noted the key headlines relating to complaints performance in 2024-25 along with the outline of the root causes identified and service improvements which had been implemented as a result of the nature of complaints received. In welcoming the focus on the effective management of performance in relation to complaints, members were also keen to ensure that the outcomes continued to inform development of key corporate strategies and Council priorities, recognising their value as important learning points.

In thanking officers for their efforts in monitoring and managing complaints performance (including increased monitoring of compensation cases in order to reduce unnecessary escalations and an improvement in the timeliness of complaint responses), members felt the issues and areas highlighted as key concerns reflected the nature of current challenges being experienced by many local residents requiring support and also the Council in being able to manage the increased level of demand for key services, especially in relation to housing. As such the report was welcomed as a means of continuing to focus on the approach towards service improvement for residents.

Whilst acknowledging the prevalence of complaints focussed on housing related issues and increase in level of compensation associated with complaints involving the housing needs service, members felt it important to recognise the impact of the ongoing housing crisis as an underlying reason involving the unavoidable length of stay being experienced by some families in unsuitable accommodation. Although not primarily indicative of a failing on the part of the Council and reflecting pressures created as a result of a London-wide shortage of suitable and affordable accommodation, an assurance was provided of the work being undertaken with the Housing Needs Service to identify cases where more careful monitoring of actions identified at the first stage of the complaints procedure was needed to ensure that they were promptly implemented, in an effort to prevent, where possible, unnecessary escalation. This had been supported more widely by a range of service improvements across the Housing Management Service (including the introduction of updated procedures, training and a new case management tool alongside established of a Housing Improvement Advisory Board) designed to address feedback and issues identified through the complaints process with officers thanked for their efforts in seeking to embed and drive the improvements identified.

Having considered the report and work being undertaken jointly by Cabinet Members with their relevant Corporate Directors to continue challenging performance it was **RESOLVED:**

- (1) To note Brent's performance in managing and resolving complaints.
- (2) To note and endorse Brent's self-assessment against the Housing Ombudsman's Complaint handling Code as detailed within Appendix D of the report.
- (3) To approve the report being referred, as required, to the relevant Scrutiny Committee.

16. **Treasury Management Outturn Report 2024-25**

In Councillor Mili Patel's absence (as Deputy Leader and Cabinet Member for Finance & Resources), Councillor Muhammed Butt (as Leader of the Council) introduced a report from the Corporate Director Finance & Resources presenting the outturn for the Council's Treasury Management activities 2024-25, in accordance with the Local Authorities (Capital Financing and Accounting) Regulations 2003.

In considering the report, Cabinet noted the economic background in relation to the current outturn position which included the continuing economic volatility and

challenges arising as a result of ongoing global geo-political tensions. In recognising the importance of the Treasury Management function in managing and planning for the level of funding required to support the Council's activities, services and affordability of the capital programme members noted that the activity looked to optimise the effect of borrowing costs and investment income whilst managing the associated risks in line with the Council's Treasury Management Strategy and Prudential Indicators, which had been approved by Full Council in February 2023 and in accordance with relevant professional codes and legislation.

In commending what members felt to be Brent's prudent financial stewardship the commitment made in seeking to ensure the Council continued to borrow in as sustainable a way as possible to deliver on key infrastructure projects without compromising the longer term stability of the debt portfolio and to ensure its investment portfolio remained as diversified as possible was also recognised given the continued nature of pressures faced.

Cabinet thanked officers for their work in relation to managing the Council's Treasury Management activity and having considered the report **RESOLVED:**

- (1) To note the overall financial performance for 2024-25, as set out within the report.
- (2) To approve 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.

17. Exclusion of Press and Public

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

18. Any other urgent business

There were no items of urgent business.


Prior to ending proceedings, Councillor Muhammed Butt (as Leader of the Council) took the opportunity to formally thank Alice Lester (as Corporate Director Neighbourhoods & Regeneration) for the support provided to Cabinet and all members more widely during her time at Brent. In recognising this would be her final Cabinet meeting prior retiring from the Council he, along with the rest of Cabinet, wished her all the best for the future and thanked her for the legacy left in terms of the programme of regeneration delivered during her time at Brent.

The tribute paid by the Leader was supported by Councillor Benea (as Cabinet Member for Regeneration, Planning & Property) who also took the opportunity to personally thank Alice Lester for her support and to wish her all the best in her retirement.

The meeting ended at 11.30 am

COUNCILLOR MUHAMMED BUTT
Chair

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 Brent	Cabinet 13 October 2025
	Report from the Corporate Director, Finance and Resources
	Lead Member - Deputy Leader & Cabinet Member for Finance and Resources (Councillor Mili Patel)
Quarter 2 Financial Forecast 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:	Two: Appendix A: Savings Delivery Tracker Appendix B: Prudential Indicators
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Rav Jassar, Deputy Director, Corporate and Financial Planning Tel: 020 8937 1487 Email: Ravinder.Jassar@brent.gov.uk Amanda Healy, Deputy Director, Investment and Infrastructure Tel: 020 8937 5912 Email: Amanda.Healy@brent.gov.uk

1.0 Executive Summary

- 1.1 This report sets 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 2 2025/26.
- 1.2 The Council's revised General Fund revenue budget for 2025/26 is £431.4m. The forecast at Quarter 2 is an overall overspend of £9.2m against the revenue budget, £2.7m overspend against the Dedicated Schools Grant and £2.6m overspend on the Housing Revenue Account. The current budget also reflects

£8.9m of savings agreed by Full Council in February 2025, the status of which are set out in Appendix A.

- 1.3 The tables below show the forecast position against budget for the General Fund, Dedicated Schools Grant, Housing Revenue Account and Capital Programme.

Table 1: 2025/26 Quarter 2 forecast for the General Fund

	Budget	Forecast	Overspend / (Underspend)
	£m	£m	£m
Service Reform and Strategy	181.5	183.6	2.1
Children, Young People and Community Development	96.0	98.2	2.2
Neighbourhoods and Regeneration	35.4	35.3	(0.1)
Finance and Resources	31.7	31.7	0.0
Residents and Housing Services	31.1	36.1	5.0
Subtotal Service Area Budgets	375.7	384.9	9.2
Central Budgets	55.7	55.7	0.0
Total Budget Requirement	431.4	440.6	9.2
Funding	(431.4)	(431.4)	0.0
Grand Total General Fund Budgets	0.0	9.2	9.2
DSG Funded Activity	0.0	2.7	2.7
Housing Revenue Account (HRA)	0.0	2.6	2.6
Net Total*	0.0	14.5	14.5

*DSG and HRA budgets have been presented as net figures in the table above. Gross income and expenditure budgets for the DSG and HRA are shown below.

Table 2: 2025/26 Quarter 2 forecast for the Dedicated Schools Grant

DSG gross income and expenditure			
	Budget	Forecast	Overspend / (Underspend)
	£m	£m	£m
DSG			
Income	(252.0)	(252.0)	0.0
Expenditure	252.0	254.5	2.7
Total	0.0	2.7	2.7

Table 3: 2025/26 Quarter 2 forecast for the Housing Revenue Account

HRA gross income and expenditure			
	Budget	Forecast	Overspend/ (Underspend)
	£m	£m	£m
HRA			
Income	(69.9)	(72.9)	(3.0)
Expenditure	69.9	75.5	5.6
Total	0.0	2.6	2.6

Table 4: 2025/26 Quarter 2 forecast for the Capital Programme

Portfolio / Programme	Original Budget 2025/26	Revised Budget 2025/26	Current Forecast	FY Variance	
				(Underspend)/ Overspend	(Slippage)/ Brought Forward
	£m	£m	£m	£m	£m
Corporate Landlord	9.7	11.9	11.0	(0)	(0.9)
Housing - GF	114.1	103.5	99.4	(4.1)	0.0
Housing - HRA	50.4	30.1	33.7	3.3	0.3
Public Realm	17.8	36.0	34.9	(0.1)	(1.0)
Regeneration	106.5	111.0	102.3	0.0	(8.7)
CYP & Community Development	17.1	26.1	23.1	0.0	(3.0)
South Kilburn	28.0	31.0	31.0	(0.9)	0.9
St Raphael's	3.2	3.5	0.4	0.0	(3.1)
Grand Total	346.8	353.1	335.8	(1.9)	(15.5)

Current Economic Environment

- 1.4 In the current and medium term, the economic environment is weak. Although uncertainty due to global trade restrictions has reduced since the Q1 report, domestic and geopolitical risks around economic activity remain, which will continue to weigh down on GDP growth.
- 1.5 Inflation has fallen from a peak of over 11% in 2022, to close to the Bank of England's 2% target since the middle of 2024. In the August 2025 Monetary Policy Report, the Bank forecast that inflation will peak at 4.0% in September 2025 partly because of higher energy prices, before falling back to the 2% target by 2027. Since the Q1 report, the Bank has cut the interest rate by a further 0.25 percentage points to 4.0%. However, the Monetary Policy Committee acknowledged in the report that the temporary increase in inflation could put additional upward pressure on wages and price-setting, leading to a higher risk of inflation becoming sustained. If inflation remains high, the Bank may keep interest rates higher for longer than previously forecasted.
- 1.6 The residents of Brent face an equally challenging economic environment with the ongoing effects of the cost-of-living crisis exacerbated by levels of unemployment above national and London averages. After the effects of the recent high level of inflation, and continuing high interest rates, combined with global instability, mean that the cost-of-living crisis is unlikely to end soon.

Local Government Funding

- 1.7 During 2025/26, the government has committed to fundamental reform of local government financing from 2026/27, with particular focus on diverting resources to authorities that need them most. As part of these reforms, the government has stated its intention to deliver a multi-year funding settlement to local authorities for 2026/27. This will provide greater certainty within which to plan budgets for future years.
- 1.8 To support long-term financial sustainability, a consultation on proposals to update and reform the funding system was carried out during the summer. Initial modelling of the proposed reforms was carried out with support from London Councils and LG Futures and a response to the consultation was submitted by Brent Council to central government in August.
- 1.9 The government will provide their response to the consultation in the autumn, followed by a local government finance policy statement and the first multi-year settlement, expected to be delivered in December 2025. A further update on the impact of the proposed funding reforms on Brent Council's budget and MTFS will be provided to Cabinet alongside the 2026/27 Draft Budget report in November 2025.

Maintaining Financial Control

- 1.10 Local government is facing the most challenging financial environment for many decades. Many councils are overspending and depleting their reserves,

most are experiencing the adverse effects of a prolonged period of high inflation, high interest rates and significant increases in demand due to demographic changes. In 2025/26, the government agreed to provide 30 Councils with support to manage financial pressures via the Exceptional Financial Support process (up from 19 in 2024/25), including 8 Councils for which support has been agreed for prior years. Many more authorities are in talks, allowing them to use capital resources (such as borrowing or selling assets) to pay for day-to-day spending. Concerns about future levels of government funding are widespread. Against this backdrop, Brent has maintained a strong position in terms of financial resilience and sustainability with a good track record of delivering savings and balancing the overall budget. However, in 2024/25 the Council overspent its revenue budget by £14.9m and is forecast to overspend again in 2025/26.

- 1.11 Despite the considerable efforts of the Council to manage its position, the operating environment and wider economic context continues to be volatile with small changes in demand disproportionately materialising in large financial pressures. These are particularly in Children's social care and Adult social care packages in terms of volumes and complexities, and temporary accommodation volumes, costs of provision and loss of Housing Benefit subsidy from central government. The Council is also dealing with the impact of rising costs due to the continued high level of provider inflationary pressures, and the impact of the cost-of-living crisis which also affects important income streams of the Council.
- 1.12 Since the Quarter 1 forecast report was presented to Cabinet in July 2025, the financial position has worsened. There is a forecast overspend of £5m in the Housing service, which continues to experience high levels of demand due to a rise in homelessness and a reduction in the supply of suitable temporary accommodation. Additionally, there are growing pressures in Children's and Adult social care due to increasing client numbers and the cost of care packages currently trending above that which was initially budgeted for. The sections below set out the Council's strategy and actions to deal with these pressures for the remainder of the year.
- 1.13 The introduction of spending controls and the Budget Assurance Panel in 2023 helped to facilitate a better grip of the Council's financial position and stabilise in year overspends. This introduced a range of measures including proactive vacancy management, directorate led targeted non-essential spending control including agency and interim spend, alongside department led management action plans reflecting other actions being undertaken. These sensible, proactive and prudent measures are estimated to have led to cost avoidance of over £8m in 2024/25 and are providing more assurance over the Council's spending decisions.
- 1.14 While Brent is not currently in the financial situation of those Councils that have recently issued, or threatened to issue, a Section 114 notice (legally required when the council cannot balance its budget, unlike the NHS and other parts of the public sector, councils are not allowed to carry a deficit) all efforts

must be focused on positively changing the financial position.

- 1.15 Given the current forecast overspend, these spending controls will continue throughout 2025/26. However, it is clear that further actions are now necessary. With the exception of maintaining health and safety, meeting a statutory requirement and fulfilling a contractual obligation, all other spending will be halted until further notice. In addition, controls on staff payments, recruitment and use of agency workers will be significantly enhanced. This change is to ensure decisions are made at the appropriate level with clear accountability.
- 1.16 Delivering these actions will be a significant challenge for the Council's services during the coming months, but this is considered to be a necessary step to ensure that the Council's budget can be returned to a sustainable position. Council officers and members will continue to work hard to minimise the impact on residents and provide the highest possible quality of service within the current resource constraints.

2.0 Recommendation(s)

- 2.1 That Cabinet note the overall financial position and the actions being taken to manage the issues arising.
- 2.2 That Cabinet note the savings delivery tracker in Appendix A.
- 2.3 That Cabinet note the prudential indicators for treasury management in Appendix B.
- 2.4 That Cabinet approves the virements set out in section 9.21 of this report.
- 2.5 That Cabinet notes the discretionary Business Rates reliefs to be awarded as set out in Section 9.18 of this report.
- 2.6 Approve the amendments to the capital budget as set out in paragraph 12.2.
- 2.7 Delegate authority to the Corporate Director for Finance and Resources to agree the terms of the £40m loan facility to I4B as set out in paragraph 12.2.

3.0 Cabinet Member Foreword

- 3.1 Brent Council continues to navigate a landscape of profound economic and social challenges as we set out the financial forecast for the Council's budget. Despite careful financial prudence from officers and Members alike, spending controls, and in-year savings targets, the strains of budgetary pressures on local authorities now mean a forecasted overall overspend of £14.5m for Brent across the next financial year. This is a sobering reminder of the pressures we face, but it is also an opportunity to reflect on further cost avoidance measures as we fulfil our unwavering commitment to protecting services for our residents.

- 3.2 The pressures are not abstract – they are rooted in the lived experiences of our communities. In 2024 to 2025, we received 6,281 homelessness applications — including 3,538 from single individuals and 2,743 from families. While this represents a 14% reduction from the previous year, the demand remains high, and the cost of temporary accommodation continues to rise.
- 3.3 The Council continues to take a number of proactive interventions to alleviate these pressures on Housing, increasing supply through our wholly owned housing company, i4B, and increasing the Housing Needs and Support budget by £14 million this year. We are also implementing a new model of resident support, backed by £1 million in recurring funding, to help households build long-term resilience; and expect for 899 new properties to be added to our portfolio during the next two financial years as part of our capital programme.
- 3.4 Across the Council, we are delivering £8.9 million in agreed savings, with 91 per cent on track for delivery. We are investing in our people, our infrastructure, and our future. We are also working across departments to deliver the Embrace Change programme, transforming how we support residents and manage public money. And we are taking immediate steps to implement sensible, proactive and prudent measures across the Council, with an end to all expenditure on non-essential items alongside wider spending controls.
- 3.5 While Brent does not currently find itself in the position of its peers who have recently issued, or threatened to issue, an effective bankruptcy notice, we must be honest about the risks. The cost of social care packages continues to rise, with a 3.5% increase in service users and a 7% increase in average weekly costs in 2024 to 2025. The pressures in children's placements, particularly in residential and secure settings, as well as on our Dedicated Schools Grant, remain acute.
- 3.6 We must continue to challenge ourselves, innovate, and collaborate. Brent has never shied away from difficult choices, and in the following financial quarters, we will continue to take whatever action is needed to retain this council's reputation for financial sustainability.

4.0 Revenue Detail

Service Reform and Strategy

Table 5: 2025/26 Quarter 2 forecast for Service Reform and Strategy

Service Reform and Strategy	Budget (£m)	Forecast (£m)	Overspend / (Underspend) (£m)
Adult Social Care	123.9	125.1	1.2
Strategic Commissioning & Capacity Building	16.6	17.3	0.7
Public Health	26.2	26.2	0.0
Leisure	1.8	2.0	0.2
Integrated Care Partnerships	0.1	0.1	0.0
Communications Insight and Innovation	12.9	12.9	0.0
Total	181.5	183.6	2.1

Summary

- 4.1 The Service Reform & Strategy department (SRS) budget for 2025/26 includes previously agreed savings of £4.7m. Growth funding has also been built into the budgets of £10.9m to account for assumptions around demographic and inflationary trends.
- 4.2 The Directorate is forecast to overspend by £2.1m at Quarter 2. A number of financial pressures have arisen since the reported break-even position at the end of the first quarter.
- 4.3 Demand for social care services continues to see an increase. Growth for both demand for services and inflation was factored in as part of the budget setting process for 2025/26. Increases in excess of what was previously modelled is leading to budget pressures in the service. Since the beginning of the financial year, the number of service users has increased by 1.6%. This increase is broadly in line with the growth assumptions. The average costs of a placement is increasing above what was expected when the budget was set, with costs of new placements also being higher than existing placements. In addition to financial pressures arising from cost and demand increases, an increasing number of complex cases being presented is also leading to financial pressures. Pressures arising from care packages are forecast to be £0.5m.
- 4.4 Current actions to manage these pressures include exploring the option of stepping clients down into suitable accommodation, reviewing CHC/S117 eligibility and bringing an end to B&B temporary accommodation.
- 4.5 In addition, changes are being made to the front door of services to manage the flow of referrals more effectively. Triage at the front door is being strengthened to ensure that people are signposted to community or voluntary sector options before escalating to statutory services. Additionally,

Reablement is being promoted as a first option before considering long-term care. This means that all new referrals will be considered for reablement to reduce the number of people going straight into high-cost packages. Carers assessments are being proactively offered, as well as support upfront to reduce breakdowns in care, which often lead to expensive residential placements.

- 4.6 Regarding flow and case review, a clear distinction is being made between short-term and long-term support, ensuring that packages are explicitly time-limited where appropriate. We are conducting early reviews to step down support if possible. Additionally, reviews for the top 10% of most expensive cases are being fast-tracked to check whether needs can be met in a different, lower-cost way.
- 4.7 Other mitigations/plans to reduce pressure on care costs include:
- Emphasis on assessing 1:1/2:1 care costs through timely assessments and intervention.
 - Evaluating short-term packages to ensure they are providing the necessary care provision and are not on the system for the longer duration.
 - Continuing engagement with Health regarding Section 22 funding, reviewing CHC/S117 funding. Greater clarity/ planning around post discharge of clients.
 - Robust commissioning of new packages – ensuring providers are providing value for money and the most appropriate care package for our clients.
 - Benchmarking placement costs with partners at NWL. Ensuring we are achieving Value For Money compared to the care market.
 - Demand management is being monitored through QAM (Quality Assurance). £2.24m cost avoidance has been estimated to 31st March 2026. This is based on calculations on cases where requests for new/increased service provision were not approved/resubmitted.
- 4.8 The Council's community equipment provider has declared insolvency. Alternative provisions are being arranged in both the short and medium term in order to maintain service delivery. At the time of this publication, the extent of the financial pressure arising from this are unknown, however it is estimated to be £0.5m. In addition, the delay in implementation of charging for Telecare has caused an estimated pressure of £0.2m.
- 4.9 Within Strategic Commissioning and Capacity Building there is an estimated pressure of £0.7m. This pressure relates to Housing Related Support budgets, within which there was a planned savings target of £0.5m. At the time of this publication, it is unlikely that the savings will be delivered. Actions aimed at mitigating this pressure are being developed. A review of commissioned HRS services has been undertaken. This provided recommendations on both short-term and longer-term service enhancement and efficiency opportunities. Officers are working with providers to develop and implement short-term actions aimed at mitigating the pressure including looking at what can be done to reduce service use. The impact of this needs to be assessed and fully

understood. A working group is in place to commence recommissioning of all services.

Risks and uncertainties

Adult Social Care, Strategic Commissioning & Capacity Building and Integrated Care Partnerships

- 4.10 In addition to the risks linked to packages explained above, there remains a number of other risks and uncertainties which could impact on the budgets within the SRS department. These include the following:
- 4.11 Recruitment and retention of staff remains a risk nationally in the social care sector. The sector continues to be faced with high staff turnover and vacancy rates. The shortage of qualified staff can have detrimental effects on the care provided to adult service users and added stress on existing staff. The national shortage of care workers has changed the workforce model across social care leading to a reliance on agency staff that are more costly compared to permanent staff. Management continues to focus on agency to permanent conversions as part of its workforce planning strategy and to maintain stability for the clients. An internal realignment of staffing was undertaken to better align the structure to Brent's priorities.
- 4.12 Partnership working with the NHS is a key factor in management of finances within the social care sector, with linkages between the Council and NHS for Section 117 and Continuing Healthcare (CHC) clients. This relationship has seen significant improvement during the last year, and the continuation of this progress will be important to ensure that any financial pressures can be mitigated early on.

Public Health

- 4.13 As of Quarter 1, the Public Health grant is forecast to break even, despite sustained inflationary pressures and rising costs in NHS-commissioned contracts under the national Agenda for Change framework. These financial pressures have been compounded year on year, as NHS pay awards have consistently exceeded the annual uplifts to the Public Health grant.
- 4.14 For 2025/26, the government has confirmed an increase in grant allocations to help address ongoing pay-related pressures arising from the 2024/25 NHS pay awards. While this uplift will help ease some of the strain, the council will also draw on its Public Health earmarked reserves to ensure the continued delivery of essential services. The allocation for 2025/26 also includes dedicated funding to support the expansion of supervised toothbrushing programmes.
- 4.15 Spending on targeted Public Health initiatives—funded through the Drug and Alcohol Treatment Recovery and Improvement Grant (DATRIG), Stop Smoking Grant, and Start for Life Grants—is progressing as planned and aligned with the outcomes set out in national guidance. The DATRIG, issued

by the Department of Health and Social Care (DHSC), has replaced the previous Supplementary Substance Misuse Treatment and Recovery Grant (SSMTRG) and Rough Sleepers Drug and Alcohol Treatment Grant (RSDATG) which, in recent years, have enabled a significant expansion of local treatment services, resulting in improved outcomes.

Leisure

- 4.16 Bridge Park Community Leisure Centre officially closed on 31 July 2025, following an extended period of community consultation. The £0.25m overspend has resulted from part-year running costs.
- 4.17 Willesden Sports Centre continues to face significant financial pressures due to rising indexed unitary charges and increasing utility costs. The forecast assumes a full drawdown of the £0.4m smoothing reserve. The reserve is expected to be fully utilised within the current year. In response, the council is working closely with leisure providers to develop a sustainable delivery model that ensures the long-term affordability of the service.

Communications, Insight and Innovation

- 4.18 For the Communications, Insight and Innovation service which includes Change and Customer Insight, Communications, Digital Strategy, and ICT Solutions (including Brent's funding for the Shared Technology Service), there are currently no significant risks to the budgets and savings delivery.
- 4.19 The service aims to manage any vacancies to support delivery of planned activities without disruption and ensure efficiency improvements are achieved through process automation and contract renegotiations. The service also oversees The Drum, which has undergone a review this year to optimise its commercial income potential.

Savings and Slippages

- 4.20 A savings target for 2025/26 of £4.7m is planned to be delivered across several services within the department including staffing reductions, income generation, technology enabled care and managing demand. As mentioned above, the estimate pressure resulting from slippages against savings targets are £0.7m. The department will work to manage any risk as stated earlier.

Summary of Key Assumptions

- 4.21 Table 6 summarises the main assumptions made in the forecast which could have a significant impact if there are changes.

Table 6: Summary of key assumptions in forecast for Service Reform and Strategy

Key Assumption	Downside if worse	Upside if better	Mitigations
Increases to the cost of social care packages above what has been modelled, with client numbers remaining in line with what was modelled	A 1% increase over and above the modelled cost of care packages could result in a £0.7m pressure	A 1% decrease below the modelled cost of care packages will result in costs of £0.7m less than what was anticipated	The Council is working closely with the service providers and provides robust challenge of individual package costs based on evidence as part of placement reviews.
Increases to social care client numbers above what has been modelled, with package costs remaining in line with what was modelled	Additional budget pressures should there be clients beyond those modelled as part of the MTFS.	Client numbers falling below those modelled would reduce the cost to the Council.	The Council is working on developing PowerBI tools to allow for better monitoring of placements. Consistent monitoring and reporting will be made to facilitate early identification of pressures so mitigating actions can be taken.
Leisure - Utility costs to stay within the expected forecast	Additional pressure on the leisure reserves	Reduced pressure on the reserves	Service is monitoring activity and pricing to ensure are updated and reflected in a timely and accurate way.

5.0 Children, Young People and Community Development (CYPCD) (General Fund)

Table 7: 2025/26 Quarter 2 forecast for Children, Young People and Community Development

CYP Department	Budget (£m)	Forecast (£m)	Overspend (Underspend) (£m)
Forward Planning, Performance & Partnerships	48.9	50.0	1.1
Inclusion	3.2	3.9	0.7
Setting and School Effectiveness	0.0	0.3	0.3
Virtual School	0.5	0.5	0.0
Early Help	3.3	2.8	(0.5)
Localities	0.4	0.4	0.0
LAC and Permanency	6.6	7.2	0.6
Children with Disabilities	14.8	14.2	(0.6)
Safeguarding and Quality Assurance	2.3	2.2	(0.1)
Family Support and Child Protection	11.3	12.0	0.7
Community Development	1.6	1.6	0.0
Central Management	3.1	3.1	0.0
TOTAL	96.0	98.2	2.2

Summary

- 5.1 As of July 2025, emerging pressures totalling £2.2m have been identified within the CYPCD General Fund budget, primarily due to rising costs in placement services for children in care. This budget falls within the Forward Planning, Performance & Partnerships (FPPP) service. Additional risks and uncertainties may impact on this position further as the year progresses.
- 5.2 Key pressures within the FPPP service are primarily driven by rising costs associated with residential, remand secure and welfare secure placements.

Placement pressures

- 5.3 Residential and secure placements are experiencing significant pressures of £3.1m. However, these are being partially mitigated by projected underspend in other areas, including foster care and adoption due to reduced demand, along with reduced costs of placements in supported accommodation, and additional income and contributions, resulting in a net projected overspend of £1.1m.
- 5.4 The number of Looked After Children (LAC) at quarter 4 of 2024/25 was 298, compared to the London average of 292, although Brent has a significantly lower than average LAC rate of 40 per 10,000 children compared to the

London average of 50 per 10,000 children. While the number of LAC has declined in the last year, there has been a sharp rise in children and young people entering care with complex needs, particularly since late 2024/25. This is reflected in the increase in residential placements with 41 children in residential care in mid-September 2025 – 11 more than the previous year. In addition, the average cost of residential placements has increased. Identifying residential children's home placements can be very challenging despite comprehensive nationwide searches using both the Commissioning Alliance direct Purchasing Vehicle framework and also spot purchase providers. This means the local authority has limited negotiating power in relation to initial costs. The FPPP Service has systems in place to renegotiate costs as much as possible and has close monitoring of additional residential placement spend, for example reviewing the need for additional support worker hours.

- 5.5 Youth Justice data also indicates a higher-than-usual number of secure remand cases, with six young people in care at the start of 2025/26 and this has increased to 7 as of mid-September. The length of time of these placements is dependent on the speed of moving cases through the criminal justice system and beyond the local authority's control.
- 5.6 A number of measures are in place to manage down placement costs. Service areas across the CYPCD directorate are working collaboratively to plan successful step-downs from residential placements for young people when they are ready and there is a focus on reunification back home for looked after children where safe and appropriate. The Director of Education, Partnerships and Strategy is leading a review of all residential placements to ensure there is timely progress and active management of actions to move children to the most appropriate setting, where appropriate and in line with their care plan.
- 5.7 A Strategic Commissioning Group, chaired by the Corporate Director of CYPCD, aims to reduce costs through two primary initiatives: the expansion of in-house foster care provision and the enhancement of support for care leavers to promote independent living. The number of care leavers has increased significantly in recent years (currently 500 are eligible for support). The second initiative has realised some financial savings within the supported accommodation budgets (through housing benefit income). The shortage of housing in the borough means, however, that care leavers are not able to access permanent accommodation in line with their independence plans which is impacting on progress to reduce the cost of semi-independent accommodation. The recruitment of foster carers did not significantly change during the 2024/25 financial year, though six new foster carers were recruited against a target of 10. Actions taken to improve outputs include increasing allowance rates to the West London average, development of the Mockingbird programme that uses an extended family model to provide a range of support and working collaboratively with West London boroughs on a fostering hub to streamline fostering enquiries and enhance marketing activity.
- 5.8 Work continues with other West London authorities to improve local authority run residential home sufficiency, with Brent supporting the development of

new provision across the sub-region. Places will be made available to local authorities on a spot-purchasing basis.

Other service pressures

- 5.9 The Family Support and Child protection is forecasting an overspend of £0.7m. Mainly due to an increase in spend against the budget held for clients with no recourse to public funds. There are also staffing pressures within the Multi Agency Safeguarding Hub team and the Family Support and Child Protection teams. It has been agreed that the No Recourse to Public Fund and Homelessness CYPCD budgets and team will transfer to the Housing directorate to create some synergies by sharing knowledge, staff, and resources to achieve greater efficiencies and impact.
- 5.10 There is also a forecasted overspend of £0.7m within the Inclusion service area. Staffing budget pressures in the Educational Psychology and Special Needs team are driving this, as meeting statutory deadlines for Special Educational Needs assessments has required reliance on locum staff, who are more costly than permanent employees due to recruitment challenges.
- 5.11 LAC and Permanency is reporting a £0.6m overspend, mainly driven by legal costs (£0.3m), which are largely unavoidable, are influenced by the number of court proceedings and are challenging to predict. The pressure this year relates to a small number of legal challenges and high-cost legal disbursements linked to age assessments of Unaccompanied Asylum-Seeking Children (UASC). There are also pressures in the contact team relating to payments to external agencies for out-of-borough cases. The service is reviewing the staffing structure to reduce reliance on agency staff and external contact centres within the borough, to mitigate staffing pressures against this budget.
- 5.12 The Setting and School Effectiveness service is reporting an overspend of £0.3m due to a shortfall of income against historic income targets applied to the Gordon Brown Short Break Centre. The service is assessing ways to reduce the impact of this pressure, including potential increases to fees and charges aligned with benchmarked rates.
- 5.13 Children with Disabilities (CWD) are reporting an underspend of £0.6m This is primarily due to lower projected costs for CWD placements and adjustments for prior year placement costs. The forecast assumes that all the income due from the ICB for 2024/25 and the estimated income for 2025/26 will be received.
- 5.14 The forecast against the Early Help budgets is an underspend of £0.5m, mainly derived from the Brent Family Solutions service and the efficiencies against the Barnardo's contract which supports the Brent Family Well Being Centres.

- 5.15 The directorate remains focused on closely monitoring non-essential expenditures, strategically holding vacancies where sustainable and ensuring continued progress is made on reducing agency staff costs.

Risks and Uncertainties

- 5.16 The persistent overspend on high-cost residential and secure placements poses a major financial risk. While underspends may be identified later in the year through robust budget monitoring and achievement of further in-year savings, they cannot be guaranteed as an individual high cost residential or secure placement can cost over £0.5m per annum.
- 5.17 The in-house residential children's home that was originally planned to be operational from May 2025 and expected to contribute to the management of costs and placement sufficiency has been delayed further. This was initially due to a delay from Ofsted commencing the regulation process. However, a recent, unexpected incident which resulted in damage to the front of the property has added to the delayed opening as remedial capital works are required.
- 5.18 Significant risks exist in the No Recourse for Public Funds (NRPF) and budgets held for overstayers. This is a continuation of the pressures that the area experienced in 2024/25 due to the volume of clients and increased costs, specifically related to housing. This budget currently sits within the Family Support and Child Protection service area and is expected to move to Housing services later in this calendar year.
- 5.19 Other risks exist within specific service areas such as the Setting and School Effectiveness (that reflect an unachievable historic income target at the Gordon Brown Centre) and the Inclusion service (staff pressures to maintain Special Educational Needs assessment statutory deadlines).
- 5.20 The continued growth in the number of children and young people with Education, Health and Care Plans (EHCPs) may increase the pressure on some general fund services, such as SEN Transport. Increase in demand exacerbated by rising prices on taxi routes and other pressures such as the effect of the London Living Wage and National Insurance increases, retender of the taxi routes, and an ageing fleet will place financial pressures on the budget. Delivery of the Travel Assistance Policy Implementation Plan (TAPIP) is essential to manage transport costs in 2025/26. A set of Key Performance Indicators has been developed to monitor the success of the plan. The Children with Disabilities budget within the Localities service could also be impacted by an increase in EHCPs.
- 5.21 Disputes and delays in cost-sharing agreements with the Integrated Care Board (ICB) for complex care packages continue to pose a high risk, particularly when ICB engagement has not resulted in effective resolution in a number of cases. However there had been some positive engagement with the ICB during the last quarter. About half of the cases related to the accrued income for complex care cases during the 2024/25 financial year have been

agreed with further discussions required to reach an agreement on outstanding cases, as well as the contributions for 2025/26.

Savings and Slippages

- 5.22 The department has £2m of savings to deliver in 2025/26. Comprising: £0.751m from service reductions, £0.540m from increased income/contributions, £0.405m from restructuring, £0.290m from service transformation and £0.013m from Digital Transformation.
- 5.23 The service transformation saving of £0.290m, linked to the opening of the new in-house residential children's home, is currently at risk, as the home is now expected to open in the latter part of the financial year. The remaining savings are expected to be delivered as planned.

Summary of Key Assumptions

Table 8: Summary of key assumptions in forecast for Children, Young People and Community Development

Key Assumption	Downside if worse	Upside if better	Mitigations
LAC and Care Leaver placements forecast assumes numbers of 822 FTEs and unit costs reflect current trends.	An increase in the number of high cost residential or secure placements would place additional pressure on the budget. e.g., an increase by 4 placements in year could cause an additional pressure of £2m.	Increased step-down arrangements result in falling number of residential placements. A single stepdown from a residential placement to a semi-independent placement could reduce expenditure by c£0.2m in-year.	Ongoing review of packages for best outcomes and focus on stepdown arrangements to support children to transition from residential to foster and/or semi-independent placements. Supporting the transition of care leavers to their own tenancies, to improve outcomes and independence. Innovative support and partnering with Health for CYP Mental Health and Wellbeing, among

			other preventative measures.
Health contributions for CYP placements and Children with Disabilities (CWD) packages will be lower than the 2024/25 levels.	The spend will not be mitigated by these contributions in proportion to the overall demand.	It will assist in mitigating overall net spend.	Maximising joint funding approaches with health to ensure contributions to placement costs where applicable. Targeted activity across ICS to ensure consistency in Continuing Health Care funding.
Mix of social work staff and caseloads in the Localities and LAC & Permanency service to include the use of agency staff at a similar level than 2024/25.	If increases of 15% during the year, there could be up to £0.4m additional spend on agency social work staff to manage the pressure.	There would be a reduction in the use of agency staff and the reduced caseloads could be attractive to social workers seeking permanent roles.	Continued management action to monitor caseloads across the service and review and manage social work resources and incentives. New/more targeted recruitment campaign
Assume numbers of SEN clients requiring transport do not increase significantly and the take up of Travel Assistance is in line with expectations	An increase in the numbers would place additional pressure on the budget	Reduction of the expected overspend	Tracking and monitoring KPIs with both Harrow and internally as well as continuous contract monitoring

6.0 Neighbourhoods and Regeneration

Table 9: 2025/26 Quarter 2 forecast for Neighbourhoods and Regeneration

Neighbourhoods and Regeneration	Budget (£m)	Forecast (£m)	Overspend / (Underspend) (£m)
Public Realm	25.0	24.5	(0.5)
Inclusive Regeneration & Climate Action	2.2	2.2	0.0
Property & Assets	8.2	8.6	0.4
Total	35.4	35.3	(0.1)

Summary

- 6.1 Neighbourhoods and Regeneration Directorate are currently forecasting a £0.1m underspend at Quarter 2.
- 6.2 Within Public Realm, the Parking service are forecasting a £1.7m underspend based on PCN issuance and current performance levels. This underspend is partially offset mainly by a £0.7m pressure in Waste, and other smaller pressures across the department leaving a £0.5m underspend position overall for Public Realm.
- 6.3 Property & Assets are forecasting a £0.4m which largely comes from Commercial Property who are facing a pressure on their income generation due to expired leases and vacant properties.

Risks and uncertainties

- 6.4 Within Inclusive Regeneration & Climate Action there are pressures on income generated by Building Control and Planning.
- 6.5 Building Control's ability to generate fee income has been constrained by a decline in appointments for major developments, largely due to delays or cancellations driven by broader macro-economic conditions. Additionally, the introduction of high-rise building regulations by the Health and Safety Executive (HSE) in October 2023 has shifted the service's charging model to cost recovery, further impacting revenue. The department's capacity to secure major project work has also been reduced, as the Building Safety Regulator (BSR) now assigns nearly all such projects directly to Local Authorities, removing the opportunity to compete in the open market. Ongoing staff shortages are compounding these challenges, limiting the service's ability to pursue additional work. In response, the department is actively exploring mitigation strategies, including reviewing recruitment processes, enhancing career development pathways, increasing agency pay rates, and considering a commissioning-based model.

- 6.6 Planning and Development services have experienced similar challenges to Building Control, with fee income from applications and pre-applications declining in recent years due to the broader financial climate. However, the fee levels set for 2025/26 are expected to be sufficient to avoid any financial pressures within the service during the year.
- 6.7 Within Public Realm, Service Development & Contracts Performance are due to overspend by £700k in 2025/26. High inflation has led to higher contract inflation than was budgeted for in both the Veolia and Grounds Maintenance contracts. Property growth and increased waste disposal tonnage costs with West London Waste Authority adds to the overspend. Targeted initiatives to reduce contamination levels in recycling collections to lower processing costs are underway. Education and campaigns around food recycling, further roll out of food waste collection to flats and communal properties have seen an increase in food waste tonnages. Messaging around recycling and reduction in household general waste is ongoing and we anticipate disposal cost reductions in quarter 2 as well. Early indicators suggest these measures are having a positive impact. The receipt of EPR (Extended Producer Responsibility) funding from the government in the autumn will further help to drive down costs from waste and deliver initiatives to improve our recycling efforts. The service is working with the contractor to draw up a plan on EPR spend and how the funds could be utilised to boost our recycling rates and reduce our spend.
- 6.8 It was anticipated the new waste contract would face some pressure in the first few years, and as such an earmarked reserve was created to smooth any financial impacts between years. This reserve will be utilised in 2025/26 whilst the anticipated service improvements mentioned above become embedded.
- 6.9 Property and Assets must secure new tenants to replace those with expired leases and fill vacant properties in order to meet income targets. The current overspend stands at £0.6m. To mitigate this risk, the service is actively marketing available properties and working with agents where appropriate. Facilities Management continues to experience cost pressures, particularly due to overtime requirements in Cleaning and Security services, resulting in a forecasted overspend of £0.3m. Measures are being taken to manage these pressures, and any underspends within Property and Assets will be used to help offset the impact.
- 6.10 Based on current forecasts from the Council's energy supplier, reflecting contracts already secured for future energy supply, energy costs are expected to decrease in 2025/26. The latest estimate indicates an underspend of £0.5m within the Energy budget. This underspend will contribute to reducing the anticipated overspend within Facilities Management and Commercial Services.
- 6.11 As of the beginning of the 2025/26 financial year, the Strategic CIL fund held an opening balance of £156.9m. This entire amount has been allocated to planned infrastructure projects, with commitments categorised as follows:
- £80.0m: Formally commissioned by Cabinet; expenditure pending.

- £18.4m: Approved at sub-board level; awaiting Cabinet agreement.
- £58.5m: Provisionally allocated to prospective projects; subject to formal Cabinet approval.

All funds have been earmarked, and no uncommitted balance remains available for new initiatives at this time.

Savings and Slippages

- 6.12 Savings of £0.5m are expected for 2025/26 for Neighbourhoods and Regeneration. This main savings are expected from restructures across the department and increases in fees and charges within Waste.
- 6.13 At Quarter 2 the department is currently expecting that all savings will be delivered in-year.
- 6.14 The table below summaries the main assumptions made in the N&R forecast.

Summary of Key Assumptions

Table 10: Summary of key assumptions in forecast for Neighbourhoods and Regeneration

Key Assumption	Downside if worse	Upside if better	Mitigations
Building Control is able to mitigate pressure on its income generation.	In 24/54 the department reported a £530k overspend, without mitigation the same could occur	The department is able to generate more income providing additional revenue to the Council	Cases arriving through the BSR are being closely monitored to ensure accurate forecasting. A reserve was created in 2023/24 to mitigate pressures whilst a longer-term plan is implemented.
Recycling performance will improve and material prices for the recyclates will be in the forecast range.	The full reserve could be utilised and pressures spread into future years. There is a £560k difference between the central and worst case	If recycling improves it will reduce the cost of waste disposal, leading to a rebate on forecast charges. Based on prior years this could be up to £500k. The reserve balance is not fully	The monthly data around tonnage, rejections and market prices for recycling are closely monitored. With ongoing work to improve recycling performance.

	when modelling the cost of the recycle reprocessing budget.	used and is available to repurpose and utilise for other pressures.	
The waste contract has some variable elements which are paid for as used, for example winter maintenance. It is assumed that usage will be within the expected range.	This will create a financial pressure for the service, likely leading to an overspend.	The expected budget for this element would not be utilised. This could then be used to cover pressures elsewhere.	The service are aware of the costs of the variable elements. The volume is therefore closely monitored to ensure that the usage is appropriate.

7.0 Finance and Resources

Table 11: 2025/26 Quarter 2 forecast for Finance and Resources

Finance and Resources	Budget (£m)	Forecast (£m)	Overspend / (Underspend) (£m)
Finance Services	11.4	11.4	0.0
Organisational Assurance & Resilience	4.7	4.7	0.0
Shared Technology Services	0.0	0.0	0.0
Human Resources & Organisational Development	4.2	4.2	0.0
Legal Services	5.1	5.1	0.0
Democratic Services	6.3	6.3	0.0
Total	31.7	31.7	0.0

Summary

- 7.1 The Finance & Resources directorate is reporting a breakeven position at Q2, unchanged from Q1 forecast.
- 7.2 Organisational Assurance & Resilience experienced a pressure in 2024/25 within the Insurance Service. This was due to a change in the insurance offer for schools from the Government, meaning schools were able to utilise that offer rather than that of the Council. The service has been exploring other income sources and expects to be able to mitigate the pressure in 2025/26.

The service is now also exploring ways to get schools back onto the Council's scheme. The effects of this may be seen this year or next.

7.3 Shared Technology Services (STS) is expected to breakeven, the costs for Shared Technology Services are split between Brent, Southwark and Lewisham, so income is equal to expenditure for STS.

7.4 Finance, Human Resources & Organisational Development, Legal Service and Democratic Services are all forecasting to breakeven as at Q2.

Savings and Slippages

7.5 A total of £0.7m in savings was planned for Finance and Resources through staff reductions, service transformation, and income generation.

7.6 At Q2 all saving are expected to be achieved in 2025/26.

Risks & Uncertainties

7.7 In recent years there has been a pressure in the Insurance service due to the changes to schools' insurance, but also the cost of insurance due to claims for injuries and vehicle damage relating to footways and highways. These types of claims have seen increases, so could lead to cost increases if not addressed.

7.8 Improved recruitment and the realignment of staff in Legal Services is expected to address previous cost pressures around the use of agency and specialist staff. This will be monitored to ensure that is operating as expected and pressures can be managed.

8.0 Residents and Housing Services

Table 12: 2025/26 Quarter 2 forecast for Residents and Housing Services

Residents and Housing Services	Budget (£m)	Forecast (£m)	Overspend / (Underspend) (£m)
Housing Needs and Support	13.0	18.0	5.0
Housing Partnership and Tenant Engagement	2.3	2.3	0.0
Private Housing Services	0.2	0.2	0.0
Residents Services	15.2	15.2	0.0
Housing and Resident Services Corporate Director	0.4	0.4	0.0
Total	31.1	36.1	5.0

Summary

- 8.1 The Residents and Housing Service department is currently forecasting a possible £5m overspend for the financial year 2025/26 as significant pressures continue to be experienced by this directorate, largely in the Housing Needs and Support service.
- 8.2 The Housing Needs and Support budget overspent by £15.3m in 2024/25 due to an extremely high level of demand for this service and a lack of affordable Private Rented Sector (PRS) offers. In 2025/26, with an additional £3.4m funding allocated through the main Homelessness Prevention Grant and £12.6m of growth built into the base budget, there is an increase of £15m in the service budget in comparison to the previous financial year to deal with continuous pressures and demand. However, the demand continues to grow and the associated costs are high. Assuming the current monthly net expenditure continues at the same rate until the end of the year, total costs for the financial year could reach £18m, resulting in a £5m overspend.
- 8.3 The current average net cost of a household is £15k in Stage 1 accommodation. If 100 households were placed in social housing units or a homelessness duty was relieved through the PRS, with a total cost avoidance of £15k per household over a 12-month period, the overall cost avoidance would be approximately £1.5m, reinforcing the importance of new and alternative supply as a key mitigation.
- 8.4 If a household is moving out of a leased TA unit into the new council accommodation, then the void will be used to decant a family from Stage 1. However, if there is less than six months left on the lease, and the owner does not renew, which has been the case as more landlords are leaving the PRS market, a hand back will be required. Therefore, there is no void to use for a decant resulting in no cost avoidance.
- 8.5 The service is undertaking several proactive interventions and projects focusing on increasing the supply and finding alternative arrangements for clients in the most expensive placements in order to mitigate the pressures. Although it is important to note that the overarching budgetary pressure from homelessness may not be significantly alleviated by these potential savings, as they are not immediately cashable against the backdrop of ongoing pressures and ongoing demand for the service.

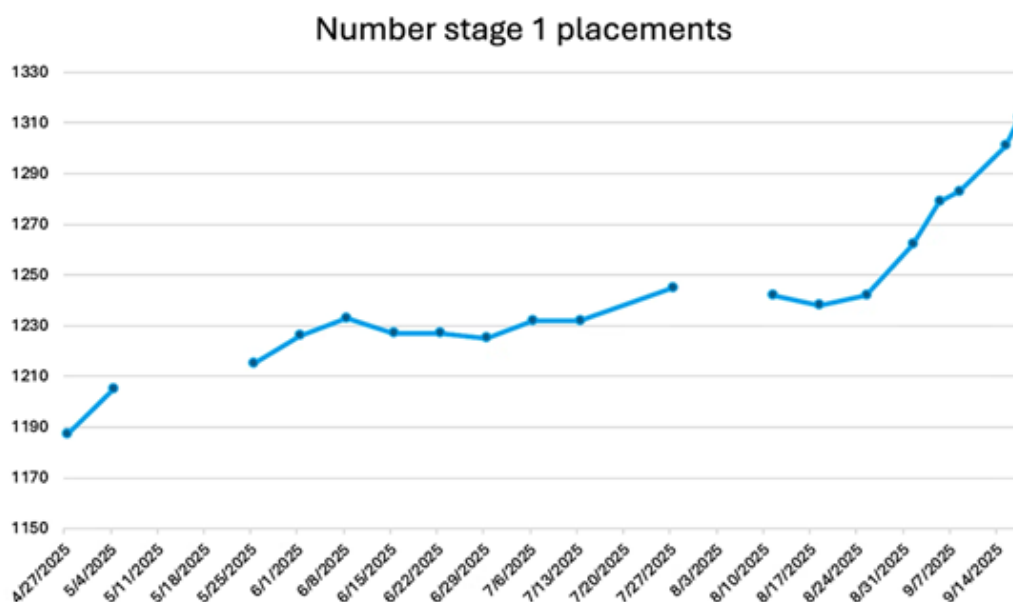
Demand

Cost per Night (£)*	Number of Households as @08/07/2025	Number of Households as @03/09/2025	% change
300	0	0	n/a
250	0	0	n/a
225	0	0	n/a
180 - 200	0	0	n/a
150 - 175	63	52	-17%
100 - 149	189	206	+9%
70-99	262	304	+16%
50-69	397	417	+5%
35-49	246	228	-7%
<35	72	73	+1%
Total	1,229	1,280	+4%

**To note that the table above illustrates the total cost per night for a household rather than the cost per room. The cheaper rooms are smaller rooms, normally only suitable for one or two people. Therefore, it is only smaller households that can be accommodated in one room, whereas the larger families, where a large proportion of the demand is, need to be provided with multiple rooms, leading to a higher nightly cost overall.*

- 8.6 As illustrated above, the total number of households in B&B accommodation in the first week of September was 1,280, a 4% increase in comparison to the beginning of July. Officers have ensured all households have been decanted from the most expensive £180 to £300 per night rooms and there has been a 17% decrease in the £150 - £175 per night group. However, there has been an increase in the use of rooms costing between £50 and £149 per night. In addition, the service is focusing on maximising spare capacity in the lower £35-£49 per night B&Bs when the opportunity presents itself. Officers negotiate the price of individual rooms to get the best price possible and are maximising the use of the lower priced B&B's, wherever possible.
- 8.7 There has been an overall increase of 8% (98 Households) in the use of B&B accommodation since the beginning of the financial year. While this represents a slower rate of growth compared to previous periods, the substantial increases seen in the previous financial years have resulted in a significantly high baseline of households in Stage 1 accommodation, along with increases in the nightly rate from current B&B providers, which remains a concern. The slower rate of growth is a direct result of the recent influx of new build social housing during the summer months that has been available to allocate to homeless households. In the first few weeks of September, the number of households has increased further by 3%.

Stage 1 TA numbers



- 8.8 The Council is expecting 899 new properties to be added to its portfolio during 2025/26 and 2026/27 as part of the capital programme. These are mostly HRA properties, some of which may house people in temporary accommodation, depending on allocations, therefore alleviating pressures on this service. Most recently, of the 66 social housing allocations made to homeless households from the Clearwater properties, 26 were direct offers targeting individuals in the most expensive forms of temporary accommodation. These households were prioritised based on their placement in higher priority bands (A and B), with the aim of reducing overall accommodation costs. The remaining 40 properties were allocated through Locata via the Choice-Based Lettings (CBL) system. These were offered to households who submitted bids and are in the highest priority banding, with allocations made in order of longest waiting time. The absence of mandatory auto-allocations for households in the highest priority bands within the Locata system continues to be a limiting factor in managing housing demand effectively. The options for implementing this approach are being explored. An annual cost saving of approximately £1m can be achieved on stage 1 accommodation as a result, a £0.6m part-year saving for 2025/26.
- 8.9 If the remaining social housing homes within the current pipeline are made available with an average occupancy of 3 months during the financial year and used to target the households in the most expensive forms of temporary accommodation, this could result in a cost avoidance of circa £2.3m in 2025/26. However, due to the increasing level of demand, the number of households in TA and the associated costs, there is a risk that this benefit could be counterbalanced.

New Supply of Temporary Accommodation & PRS

- 8.10 The increase in supply for new temporary accommodation is achieved by seeking new accommodation via acquisition or leasing.

Acquisitions

- 8.11 Two grant-funded programmes are currently supporting the delivery of temporary accommodation: the Local Authority Housing Fund (LAHF), which aims to deliver 35 units for temporary accommodation alongside resettlement homes, and the Council Homes Acquisition Programme (CHAP). Acquisitions under the LAHF programme have been more viable, with an average grant offer of £226k per unit, compared to £95k under CHAP.
- 8.12 While 22 properties have been successfully acquired under the LAHF programme, the transition to bringing these homes into active use has progressed more slowly than anticipated. Following acquisition, some properties have remained vacant due to a combination of process-related delays and timing constraints associated with the utilisation of grant funding. This has led to further pressures on temporary accommodation provision into 2025/26, as households remain in B&B accommodation awaiting move-on opportunities. To mitigate this going forward, the team are implementing strengthened reporting and monitoring arrangements and are reviewing end-to-end processes to support a timelier progression from acquisition to occupancy.

Leasing

- 8.13 While various leasing options continue to be assessed to secure cost-effective nightly paid placements, progress in delivering new supply through this route has been limited. Since the completion of the 45 unit lease at Manor Park in March 2023, few opportunities have met the Council's affordability criteria. Negotiations for the Igar Hotel to provide 40 units (an increase of 5 units plus securing preferential cost) have experienced significant delays due to issues with the counterparty's solicitors, though the arrangement is now in its final stages. A new lease has recently been completed for the Best Western, which is expected to deliver 192 units from April 2026. For 25/26 the additional supply of 5 units provides minimal cost avoidance. To help accelerate progress and strengthen commercial negotiations, Greenlight Commercial & Consulting have been engaged to support this workstream.

PRS - I4B Holdings Ltd Acquisitions

- 8.14 I4B continue with an acquisitions programme and are on track to deliver 15 street property acquisitions to allow for discharge of duty to households from the housing waiting list into PRS. They regularly review the viability of S106 acquisition opportunities and new build/block purchases which could provide significant numbers of accommodation for the company. This route continues

to provide steady investment in cost avoidance measures to mitigate our housing waiting list which currently saves the Council circa £4m per annum.

Risks and uncertainties

- 8.15 Housing Needs and Support continues to represent the most significant area of within for the department. This is primarily driven by an exceptionally high and sustained level of demand for housing services and emergency accommodation, a challenge that is experienced nationally but particularly acute within London. As at the end of 2024/25, the total demand for homeless support services in Brent stood at 6,281 households, comprising of 3,538 single individuals and 2,743 families. On average, this equates to approximately 121 new applications being submitted each week, underscoring the ongoing pressure on local homelessness services. While this level of demand reflects a 14% decrease compared to the 7,300 applications recorded during the 2023/24 period, the need for housing support and associated costs remain elevated. Despite the reduction in overall households, the volume of individuals and families requiring assistance continues to place considerable strain on resources, leading to sustained high costs for the provision of services. The total number of applications in 2025/26 is projected to reach approximately 6,862. This is in line with the amount received in 2024/25. Demand from families has remained stable, showing little to no change from previous levels. This divergence in demand patterns may have implications for resource allocation and budgeting, as family cases often require different levels and types of support compared to single-person applications. The new Renters Reform legislation comes into effect in October 2025 which means more landlords will be exiting the private rented sector market, and serving notices, resulting in a possible increase of homeless applications. Projections will be updated once more data becomes available on the impact of the legislation. In comparison to 2023/24, there was a reduction in applications which was predominantly driven by a decline in applications from single individuals.
- 8.16 London Councils conduct ongoing analysis and benchmarking against peer authorities to provide insight into the housing situation across the capital. Their latest findings indicate that housing pressures are escalating significantly beyond budgeted projections. Specifically, Councils' net deficits on homelessness service expenditures are forecasted to increase by at least £170m (18.9%) in 2025/26 compared to 2024/25. Brent, in particular, has experienced a considerable 15% rise in its deficit between the 2023/24 and 2024/25 financial years. In March 2025, the total monthly expenditure on temporary accommodation (TA) across London reached £196m, marking a significant 86% increase compared to the same month in the previous year. During this period, the number of households placed in temporary accommodation rose by 13%.
- 8.17 Given that these challenges are experienced across London, the availability of Bed and Breakfast (B&B) and annex accommodation is severely limited throughout the capital. This shortage of suitable accommodation is driving reliance on higher-cost providers and, in some cases, placements outside of

Brent. Such arrangements not only increase financial pressures due to elevated accommodation costs but also impose additional burdens on families, including increased travel expenses for children attending schools in Brent.

- 8.18 The supply of settled TA properties, leased from private landlords and intended to transition families out of Bed and Breakfast (B&B) and annex accommodation, has also declined. This reduction is primarily driven by a decrease in the procurement of new properties under Private Sector Leasing (PSL) schemes, coupled with landlords opting not to renew leases on existing properties upon expiration.
- 8.19 Findings from London Councils indicate that the PRS in London is being impacted by multiple factors contributing to a decline in the availability of rental properties. While demand for housing continues to rise, the overall supply across the market is contracting. Increased dependence on the PRS to accommodate lower-income households, combined with tightening housing benefit provisions, is further limiting affordability and availability of rental properties. Supply-side pressures such as changes in taxation, rising interest rates, and uncertainties surrounding future regulatory frameworks are notably constraining the supply of lower-end PRS properties. According to the Office for National Statistics covering April 2025 average private rents across the UK increased by 2.7% in the 12 months. Rent inflation was highest in London at 8.4%.
- 8.20 A targeted programme of work has been established to address and contain the projected overspend. Multiple workstreams have been initiated, focusing on improving the affordability of temporary accommodation and exploring new and alternative housing supply options. Council officers are proactively renegotiating contract prices and identifying alternative solutions to relocate some of the highest-cost cases, with the objective of reducing overall expenditure within the Housing Needs service. Officers continue to rigorously assess and manage homelessness applications to prevent or relieve demand where possible. In the 2024/25 financial year, 51% of homelessness approaches were successfully prevented or relieved.
- 8.21 In the 2025/26 financial year, i4B is continuing its street property acquisition programme with an initial target of acquiring 15 homes. i4B, a housing company wholly owned by Brent Council, was established to acquire, let, and manage a portfolio of affordable, high-quality PRS properties. These properties are leased to homeless families at Local Housing Allowance (LHA) rates, enabling the Council to prevent or discharge homelessness duties, thereby reducing reliance on temporary accommodation and associated costs while ensuring families have access to secure and responsible landlords. i4B remains self-financing, with the current portfolio generating annual savings in temporary accommodation costs. This self-financing portfolio generates annual savings exceeding £6m by reducing reliance on temporary accommodation. While new builds and acquisitions alone will not fully resolve the homelessness challenge, the Council is actively utilising its available resources and powers to expand housing supply. Any additional supply

secured through i4B will contribute to mitigating the risk of overspending and help manage future housing costs.

- 8.22 In addition, supported exempt accommodation properties continue to create financial pressures for the Council and represent a budgetary risk for 2025/26. Unlike other landlords, providers of supported exempt accommodation are not bound by Local Housing Allowance (LHA) caps and can charge higher rents once they demonstrate that support services are being provided. Housing Benefit subsidy levels depend on Rent Officer determinations, which are based on the rent claimed by providers. This issue reflects a national challenge, highlighting the need for clearer regulation regarding the criteria that providers must meet to qualify as Supported Exempt Accommodation. Greater clarity on what constitutes minimal care would enable a more consistent approach to assessing individual support needs across the sector. Historically, costs associated with supported exempt accommodation have not posed a significant budgetary pressure for the Council and have been managed within corporate central budgets. However, an overspend of £4m occurred in 2024/25 and this area of spend being carefully monitored. Based on the most recent data available up to week 17, the forecast overspend for 2025/26 is £1.8m.
- 8.23 A dedicated working group has been established within the Council with the objective of minimising opportunities for exploitative landlords to enter the Supported Exempt Accommodation market. The group has developed a clear strategy outlining the Council's processes for reviewing both new landlords seeking to join this market and those already operating within it. Senior managers have met with the providers with the greatest subsidy loss to the council to discuss options to reduce this loss. The reviews process will also assess individuals' support care needs and verify that providers are delivering the appropriate level of care. This strategy and reviews process should bring the cost of SEA under control and, in time, should lead to cost avoidance and/or savings. A consultation on the implementation of the Supported Exempt Accommodation Act was launched in February 2025 seeking views on plans to implement measures set out in the Supported Housing (Regulatory Oversight) Act 2023 and on the government's proposal to introduce a locally led licensing regime for supported housing across England, and new National Supported Housing Standards for the support provided. Brent Council submitted a substantial response to this outlining the Council's broad support for the Act and areas where it could go further. As the Government analyses the responses to the consultation on standards and licensing, the Council is proactively preparing to develop and implement the new licensing team. At the same time, the Council continues to make sure its activities and strategies remain aligned with emerging regulatory requirements.

Savings and Slippages

- 8.24 A total of £0.9m in savings is planned to be delivered from the department's budgets in 2025/26. The main savings are expected from restructures, digital projects and income generation opportunities. The department is currently anticipating that all savings will be achieved in full.

Summary of Key Assumptions

Table 13: Summary of key assumptions in forecast for Residents and Housing Services

Key Assumption	Downside if worse	Upside if better	Mitigations
The additional number of homeless people can be managed within the existing forecast.	Each person costs on average £397 per week to accommodate, therefore any further increases in demand would result in a circa £0.1m per quarter for every 20 people.	Faster progress on homeless pathways or any decrease in demand will reduce expenditure by £397 per week per person.	The service is focusing on moving homeless clients along the various pathways. Various project workstreams are focusing on sourcing additional housing supply to alleviate some of the pressures.
Rent collection rates for the Housing Needs service will not fall below the anticipated level.	A 5% worsening in the collection rate will cost £1m per quarter	A 5% improvement in the collection rate will recover £1m.per quarter	Collection rates are being closely monitored and investigations into the drivers for the movements in the collection rates are ongoing.
Other inflation-linked costs can be contained within existing budgets.	A 3% increase in costs above budgetary assumptions could cost an additional £0.8m per annum	A 3% cost reduction in costs would result in a circa £0.8m saving for the year.	The department continues looking for best way to achieve value for money, utilising the most efficient procurement and service delivery options and negotiations.

9.0 Central items

Collection Fund – Council Tax

- 9.1 The net collectible amount for Council Tax for 2025/26 (after exemptions, discounts and Council Tax Support) as at 31 August 2025 is £241.3m. As at

the end of August 2025, the amount collected was 43.2%, which is 0.1% lower than the amount collected in the same period in 2024/25, and 0.1% lower than the amount collected in the same period in 2023/24.

- 9.2 The service have set an in-year target for 2025/26 of 92.5% collection of Council Tax, which is an increase of 1.3% on the 91.2% achieved in 2024/25. Based on the collection in the year to date, a similar or lower level of collection on the current year liabilities can be expected at the end of 2025/26, compared to previous years, meaning that improvements are required to collection across the remainder of this financial year in order to meet this target.
- 9.3 With this in mind and for the need for significant improvement, an external review of Council Tax collection has been completed. The review has identified areas within the service where changes can be delivered to achieve potential savings and benefits. The Council is currently developing internal improvement plans on the back of the review. Additional capacity has been provided within the service, meaning that the numbers of reminder notices and summons have been sent out in higher numbers in order to maximise collection.
- 9.4 At the meeting of Full Council on 27 February 2025, alongside the budget for 2025/26, an amended Council Tax Support (CTS) Scheme from 1 April 2025 was approved. This introduced a standard 35% minimum payment for working age households and applied a percentage reduction to each of the income bands.
- 9.5 The collection rate at 31 August 2025 for those on CTS of working age is 36.54%, with 75% having made a payment toward the 2025/26 council tax. The numbers making payment have increased month on month following the dispatch of soft reminders in May and 7,134 formal reminders sent out in June 2025. Of these, 3,671 with a value exceeding £2m have been issued with a summons as no payment has been received following the formal reminder. At the summons hearing on 14 August the Council obtained 3,564 liability orders. For cases where deductions from benefits (AOB) have been set up to reduce the balances, the collection will be very slow and likely means that these individuals will carry forward significant arrears into 2026/27.
- 9.6 To offset the impact of the changes on the recipients of CTS, a Hardship Fund was agreed as part of the 2025/26 budget, providing £1.5m of support, £0.4m of which was funded by the Greater London Authority (GLA). As of 31 Aug 2025, 1,277 applications have been received for support from this fund, but only 67 (5%) have been approved. This is mainly because through open banking and credit checks it can be seen that the level of council tax should be affordable. The dispatch of recovery notices have generated more applications in this area. It should also be noted that assessments have been done in an average of 8 days from receipt, so decisions are made in a timely manner.
- 9.7 Collection continues beyond the end of the financial year, but a lower in-year collection target increases the pressure on the debt recovery team to collect

more of that debt and achieve the 97% long-term collection that has been assumed as a part of Brent's revenue budget. Evidence suggests that debt becomes much harder to collect after two years have passed, so the continued low in-year collection of Council Tax is a key risk to the Council's financial resilience in the medium term.

- 9.8 Any budget gap arising from reduced expectations for collection will have to be met either from reserves in the short term or from additional budget savings. The Council has already committed to a challenging programme of savings across 2025/26, with further savings of £30m to be delivered between 2026/27 and 2028/29 and the reserves have been depleted in recent years due to high inflation and demographic pressures. The Budget for 2025/26 approved by Full Council in February 2025, included a reduction in the assumed collection of Council Tax from 97.5% to 97%, but did not include any reductions in the growth in the taxbase. Ongoing low collection of Council Tax may result in a permanent reduction in resources for the Council through a further reduction in the taxbase used for budgeting purposes.

Collection Fund – Business Rates

- 9.9 The budgeted net collectable amount for Business Rates (NNDR) for 2025/26 is £149.8m (after exemptions, reliefs and discounts). This was based on the forecast used for the NNDR1 form in January 2025 and has increased by 6.9% from £140.1m in 2024/25. This increase is largely driven by the reduction in Retail, Hospitality and Leisure Relief from 75% to 40% from 1 April 2025.
- 9.10 The actual net collectable amount for NNDR as at 31 August 2025 is £146.5m, a reduction of £3.3m from the budget in January 2025. This is driven by additional empty properties and reductions in the gross rates payable by businesses. Further adjustments to this may occur during the year due to increases or reductions in the number of non-domestic properties and successful appeals against rateable values.
- 9.11 Any movement in the net collectable amount for NNDR does not directly affect the General Fund in the current financial year as the overall resources that the Council receives from the Business Rates retention system are determined in the Local Government Finance Settlement. However, where the actual income to the Collection Fund is different to the budgeted amount, Brent's share of the resulting surplus or deficit estimated in January is distributed to or from the General Fund in the following financial year.
- 9.12 The reduction in business rates income resulting from the additional empty property relief is an unfunded relief, meaning that this will result in a deficit that will affect the 2026/27 budget. However, the Council holds a Collection Fund reserve for the purpose of smoothing out any surpluses/deficits on the Collection Fund. It is expected that this deficit will be contained within the available reserve.
- 9.13 As of 31 August 2025, the amount collected for NNDR was 43.7%, which is in line with the amount collected in the same period in 2024/25 (43.7%).

Collection in 2024/25 was 93.4%, which remains lower than before the COVID-19 pandemic, but the service is targeting a return to 94.5% in-year collection in 2025/26. As of 31 August 2025, the collection is 0.8% down on the profiled target.

- 9.14 Collection performance is affected by large scale business rates assumed avoidance schemes amounting to £1.1m. The Home Office's recent decision to reject an application for change of use to a "place of religious worship" is a positive outcome in regards of recovery action options available to the Council. The decisions of other recent cases heard by the courts will also assist the Council in promptly identifying further attempts by agents in avoiding NNDR liability.
- 9.15 Based on historical data, the long-term collection target for NNDR is 98%. Historically, collection of arrears becomes significantly more difficult with each year that passes after the debt has been raised. Therefore, to achieve the long-term collection target, a marked improvement in the Council's collection of arrears must be seen quickly to make up for the lower expectations for in-year collection. It is also important for the Council to continue to make improvements to in-year collection, as this remains the best way of achieving the long-term target.
- 9.16 Furthermore, there remain a number of factors present in the economy which could have a negative impact on the ability of businesses to pay their Business Rates, such as high interest rates, the increase to employer's national insurance contributions and the reduction in consumer spending power as a result of the ongoing cost-of-living crisis.
- 9.17 One key area of potential concern is the Retail, Hospitality and Leisure (RHL) industry, which was particularly affected by the Covid-19 pandemic. During the pandemic relief was provided to RHL businesses at 75% of the liability. In 2025/26, this relief has been reduced to 40% of the liability, more than doubling the amount of business rates these businesses must pay. The government has stated its intention to introduce two new multipliers from 2026/27, which will formalise the lower 40% relief as part of the business rates system. The impact of this change on the affected businesses is being monitored closely and further updates will be provided in future reports.

Collection Fund – Business Rates Discretionary Rate Reliefs

- 9.18 The Council has the discretion to award rate relief to charities or non-profitmaking bodies. It also has the discretion to remit an individual National Non-Domestic Rate (NNDR) liability in whole or in part on the grounds of hardship.
- 9.19 Under the Business Rates Retention System, a percentage of the income from business rates is retained by Brent Council and the GLA. For 2025/26, the retained share in London is 67%, of which Brent Council's share is 30%. The total cost of awarding discretionary relief to the 6 organisations detailed in Table 14 is £7,209.53 for 2025/26.

Table 14: Discretionary business rates relief to be awarded

Name of person / business	Type	Level of award	Liability 2025/26	Cost to Brent at 30%
Punchdrunk Enrichment Ltd	Charity	20%	£7,714.50	£2,314.35
Jesus is the Lord Deliverance Ministry	Charity	20%	£5,364.25	£1,609.27
Markaz us-Sunnah CIO	Charity	20%	£2,644.70	£793.41
Islamia Primary School	Voluntary Aided	20%	£5,039.90	£1,511.97
Church of God (Seventh Day) West Hendon Ltd	Charity	20%	£1,746.50	£523.95
IQRAA Foundation	Charity	20%	£1,521.95	£456.58
			£24,031.80	£7,209.53

Savings

- 9.20 The 2025/26 budget, agreed at Full Council on 27 February 2025, included an £8.9m savings target, of which £4.4m had been agreed in February 2024. Appendix A sets out the progress in delivery against this savings target and any mitigating actions. Of the savings for 2025/26, at quarter 2, 81% of these are on track to be fully delivered (87% at quarter 1), which equates to delivering £7.2m of the £8.9m budgeted savings required. Since quarter 1, the number of savings which are not on target to be fully delivered has increased to 4 (up 1), with an increase in the potential budget gap of £0.5m. For all of these savings, mitigation plans are currently being developed.

Virements

- 9.21 Table 15 shows the virements and adjustments which have been entered to adjust the budgets at Corporate Directorate level between the budget approved at Full Council in February 2025 and 30 April 2025. Cabinet are recommended to approve these virements.

Table 15: Virements and adjustments in 2025/26 budget between 30.04.2025 and 31.07.2025

	2025/26 In-Year Budget at 30.04.20 25	In-year growth	Transfer of functions between services	Technical Adjustments	2025/26 In-Year Budget at 31.07.2025
	£m	£m	£m	£m	£m
Service Reform and Strategy	180.5	1.1	(0.2)	0.1	181.5
Children, Young People and Community Development	95.6	0.2	0.2	0.0	96.0
Neighbourhoods and Regeneration	35.7	0.0	(0.3)	0.0	35.4
Finance and Resources	30.3	0.1	0.6	0.7	31.7
Residents and Housing Services	30.9	0.0	(0.4)	0.6	31.1
Central Items	(373.0)	(1.4)	0.1	(1.4)	(375.7)
Total Budget	0.0	0.0	0.0	0.0	0.0

9.22 In-year growth items are budget movements from the Central Items budget to Departmental budgets which were not actioned at the start of the financial year. The table above includes the following in-year growth items added from May to July 2025:

- Permanent funding for Microsoft Unified support in the Service Reform and Strategy directorate (£39k)
- Permanent funding for a new post in the Finance and Resources directorate (£0.1m)
- Temporary funding for the Communications team in the Service Reform and Strategy directorate to deliver Borough Plan initiatives (£0.6m)
- Temporary funding for the implementation of the Triple Value Impact programme in the Service Reform and Strategy directorate (£0.3m)
- Temporary funding for Vale Farm due to reduction in management fee in the Service Reform and Strategy directorate (£0.2m)
- Temporary funding for Home to School transport service improvements following approval of a business case in Children, Young People and Community Development directorate (£0.1m)
- Temporary funding for a fixed-term post in the Finance and Resources directorate (£0.1m)

9.23 Transfers of functions between services are budget movements between Corporate Directorates, which occur when a department is moved from one

service to the other. The virement ensures that the department and the related budget remain together. The table above includes the following transfer of functions between services items added from May to July 2025:

- Transfer of Strategic Support budget from the Service Reform and Strategy directorate to the Finance and Resources directorate (£0.3m)
- Transfer of staffing budget in respect of the Council's housing companies (I4B and First Wave Housing) from the Residents and Housing Services directorate to the Service Reform and Strategy directorate (£0.2m)
- Transfer of budgets between directorates following a restructure in the Neighbourhoods and Regeneration directorate (£0.3m). £0.2m to the Children, Young People and Community Development directorate and £0.1m to Central budgets
- Transfer of staff budgets from Housing in the Residents and Housing Services directorate to Legal in the Finance and Resources directorate (£0.2m)

9.24 Technical adjustments are budget movements resulting from events which are provided for in the MTFS but only confirmed during the year (e.g. pay award), budget movements resulting from changes to processes (e.g. centralisation of budgets) or other budget movements between directorates resulting from changes to the Council's structure. The table above includes the following technical adjustment items added from May to July 2025:

- Permanent adjustments to service budgets following review of budgets subsequent to the budget load (£0.1m to Service Reform and Strategy, £0.2m to Residents and Housing Services and £0.7m to Finance and Resources, funded from Central Budgets (£1.0m)
- Temporary adjustment to the budget for Residents and Housing Services directorate for the expenditure budget in respect of the Greater London Authority's agreed £0.4m contribution to the 2025/26 Council Tax Hardship Fund, introduced to provide additional support with Council Tax bills following the changes to the Council Tax Support Scheme implemented on 1 April 2025. This increase confirms a total budget for the 2025/26 Council Tax Support Hardship fund of £1.5m.

10.0 Dedicated Schools Grant (DSG)

Table 16: 2025/26 Quarter 2 forecast for Dedicated Schools Grant by block

Funding Blocks	Overall DSG Funding 2025/26	Forecast Expenditure	Overspend/ (Underspend)
	£m	£m	£m
Schools Block	125.9	125.9	0.0
High Needs Block	82.1	84.8	2.7
Early Years Block	41.4	41.4	0.0
Central Block	2.4	2.4	0.0
Total DSG	252.0	254.5	2.7

Summary

- 10.1 At the end of July 2025, the DSG is projecting a £2.7m pressure increasing the current accumulative deficit to £16.3m by the end of this financial year. This includes a projected pressure of £1.3m against the budgets held for educating children in independent day schools and £2.1m against out-of-borough mainstream and special schools' budgets. These pressures are partially offset by a £0.4m underspend in mainstream top-up funding, additional recoupment income of £0.2m and an underspend against the SEN support services of £0.1m. These potential pressures are being closely monitored and, where necessary, will be mitigated against any underspend identified in other funding blocks.
- 10.2 The Council continues to monitor its High Needs Block Deficit Recovery Management Plan, which outlines a series of long-term actions aimed at reducing the cumulative deficit. The plan is overseen by the Corporate Director of CYPCD and the Corporate Director of Finance who coordinates and monitor actions set against the Plan. The Plan is grouped into three themes: a) managing demand, b) increasing the sufficiency of local places and c) financial management adjustments. A combination of these longer-term recovery actions and anticipated funding increases is expected to achieve a continued reduction in the deficit and new Key Performance Indicators will be agreed to continue to monitor progress in 2025/26.

Risk and Uncertainties

- 10.3 The number of children and young people with EHCPs continues to grow above forecast levels (in July 2025 the number reached 4000 for the first time). Over the years, this has created financial pressures with many authorities holding deficit balances. In addition, the increase in wages due to changes in the employer's national insurance contributions could see independent providers continuing to request high inflationary price increases.
- 10.4 The statutory override set out in the School and Early Years Finance Regulations 2021, which allows local authority to exclude DSG deficits from their broader financial accounts, preventing them from impacting Council's General Fund reserves, was initially scheduled to conclude at the end of 2022/23 financial year. However, recognising the financial challenges faced by local authorities in managing DSG deficits, the government extended the arrangement for an additional three financial years, ending in March 2026. The government has confirmed a further extension of the statutory override to end of March 2028. This protection ensures that overspending in the High Needs Block does not create immediate financial pressure on local budgets, allowing authorities more time to address structural funding challenges.
- 10.5 To mitigate this risk, the Council has a robust DSG deficit management plan, with a strong focus on managing demand, improving the sustainability of provision, and strengthening financial management to reduce the deficit. Alongside this, the outcome of the government's reforms to the SEND system

is expected, which is expected to address the level of deficits held by local authorities, as this is a national issue and not unique to Brent.

- 10.6 Depending on the outcomes of the SEND reform, and in the wider context of the Fair Funding review, the Council will continue to develop and, where necessary, strengthen its deficit recovery plan to ensure it remains fit for purpose and responsive to changing circumstances.

11.0 Housing Revenue Account (HRA)

Table 17: 2025/26 Quarter 2 forecast for Housing Revenue Account

HRA gross income and expenditure			
	Budget	Forecast	Overspend/ (Underspend)
	£m	£m	£m
HRA			
Income	(69.9)	(72.9)	(3.0)
Expenditure	69.9	75.5	5.6
Total	0.0	2.6	2.6

Summary

- 11.1 Budgets for the Housing Management function are contained within the ring-fenced Housing Revenue Account (HRA), which has a balanced budget for 2025/26 made up of £69.9m of income matched by expenditure.
- 11.2 The HRA is currently forecasting a £2.6m pressure for 2024/25 financial year, before utilising reserves. Mitigation measures are being implemented to address this shortfall, and reserves have been earmarked to cover the potential deficit at year-end if required. The fund continues to face significant risks and financial challenges in the prevailing fiscal environment.

Risks and uncertainties

- 11.3 The ongoing high inflationary environment and high interest rates are exerting pressure on both operational and capital costs. Inflation is driving up the price of materials and labour associated with repairs and maintenance, while higher borrowing costs increase the expense of financing new build and improvement programmes. The interest charge for the year is forecast to be £1m higher than initially projected.
- 11.4 The HRA is also contending with elevated demand for repairs and maintenance services. A large volume of complex repairs, as well as increased instances of issues such as damp and mould, are placing substantial strain on budgeted resources. This heightened requirement for responsive maintenance is expected to continue throughout the year, leading to cost pressures beyond original estimates. Further adding to budgetary uncertainty is the recent implementation of new contracts for repairs and maintenance services. As these contracts are still in the early stages of

embedding, there remains a level of unpredictability around actual costs and service delivery efficiencies, which could impact expenditure forecasts. It is currently projected that repair and maintenance budgets could be overspent by £5m in 2025/26.

- 11.5 Further pressures stem from the capital programme, where insufficient government funding has been allocated to meet key environmental priorities and statutory requirements, including carbon reduction initiatives and fire safety requirements for housing stock. The lack of adequate financial support to address these priorities places additional strain on the HRA's capital resources, complicating efforts to invest in sustainable and energy-efficient improvements while balancing other essential investment needs.
- 11.6 In addition, the financial and operational risks associated with adding 428 properties to the housing portfolio within the financial year must be acknowledged. Growth in the portfolio can strain existing management and maintenance resources, potentially leading to increased operational costs and challenges in delivering consistent service quality. Effective planning and resource allocation are critical to mitigating these risks and ensuring that portfolio expansion supports long-term financial sustainability. A £0.5m pressure on staffing budgets is projected for 2025/26 due to additional resources required to deal with lettings, maintenance and other administrative tasks.
- 11.7 Effective management of rent debt levels is also crucial to maintaining the HRA's overall financial health. Rising rent arrears increase the risk of bad debt provisions, which directly impact revenue streams and the Council's ability to fund essential services and maintenance. Persistent or growing rent debt strains financial planning and necessitate higher bad debt write-offs, thereby affecting the HRA's budgetary position. Consequently, robust ethical debt recovery processes and proactive tenant engagement are essential to minimising rent arrears and safeguarding the financial stability of the housing service. It is currently anticipated that the allowance for impairment will need to increase by £1m more than initially projected. The service are exploring various options to mitigate this pressure, including deploying debt collection agencies and software to increase collection rates.
- 11.8 As a result of the Council's self-referral, the required remediation programme represents a significant risk to the HRA and results in financial pressures associated with addressing the identified compliance issues. Specialists are currently assessing the situation and developing a recovery plan, with anticipated costs yet to be detailed, however it is projected that £1m will be spent on the remediation programme in 2025/26.
- 11.9 Other additional pressures on various budgets across the fund, such as decants, council tax charges, insurance and pest control are projected to result in a further £1.1m pressure in 2025/26.
- 11.10 An additional £3m in rental income beyond budgetary expectations is expected to be achieved in 2025/26, partially offsetting the budgetary

pressures outlined above. As part of the Council's capital programme, 899 properties are coming on stream during 2025/26 and 2026/27, most of which are HRA properties. 428 new units have already been added to the HRA portfolio, generating additional rental income.

- 11.11 The 2025/26 budget had anticipated a £4m revenue contribution towards capital expenditure. However, due to the current financial pressures on the fund, this contribution is no longer projected to be made. While this may result in increased borrowing costs, it frees up £4m to help alleviate revenue budget pressures. Consequently, the overall projected deficit for the year is forecast to be £2.6m.
- 11.12 While the authority's reserves currently stand at the target level of 5% of total turnover, this figure remains relatively low compared to the Council's peers. This comparatively smaller reserve base presents a financial risk, limiting the Council's capacity to respond effectively to unforeseen financial pressures or emergencies. Strengthening reserve levels will be important to enhance financial resilience and ensure greater flexibility in managing future budgetary challenges.
- 11.13 These risks are being continuously monitored and reflected in the HRA Business Plan and the Council's Medium Term Financial Strategy (MTFS).

12.0 Capital Programme

- 12.1 As at the end of July, the Capital Programme is reporting a (£17.4m) variance made up of £1.9m underspend and £15.5m slippage against the revised budget of £353.1m. The forecast position across the programme is still being refined as part of ongoing programme monitoring and review. Each Board continues to assess its portfolio, with key risks including delivery timelines, market conditions, and funding dependencies. These are being actively managed through regular oversight and adjustments to ensure the programme remains aligned with strategic priorities and delivery expectations.

Table 18: 2025/26 Quarter 2 forecast for the Capital Programme

Portfolio / Programme	Original Budget 2025/26	Revised Budget 2025/26	Current Forecast	FY Variance	
				(Underspend)/ Overspend	(Slippage)/ Brought Forward
	£m	£m	£m	£m	£m
Corporate Landlord	9.7	11.9	11.0	(0)	(0.9)
Housing - GF	114.1	103.5	99.4	(4.1)	0.0
Housing - HRA	50.4	30.1	33.7	3.3	0.3
Public Realm	17.8	36.0	34.9	(0.1)	(1.0)
Regeneration	106.5	111.0	102.3	0.0	(8.7)
CYP & Community Development	17.1	26.1	23.1	0.0	(3.0)
South Kilburn	28.0	31.0	31.0	(0.9)	0.9
St Raphael's	3.2	3.5	0.4	0.0	(3.1)
Grand Total	346.8	353.1	335.8	(1.9)	(15.5)

Budget Additions

12.2 The revised budget includes the following additions:

- An uplift of the Housing General Fund capital budget for the £40m loan facility to I4B to support its street property acquisition programme that Full Council approved as part of 2024/25 budget setting.
- Additional budget of £1.0m for the Housing HRA capital budget consisting of £0.5m for the Northgate Upgrade and £0.5m for staff capitalisation, primarily for the major repairs team. This capital budget uplift will be funded from borrowing with the interest costs covered by the revenue savings from capitalising these costs.
- Uplift of the Queen's Park Gyratory and Queen's Park and Cullen development budgets to reflect that Brent has entered into an agreement with the GLA to apply £4.4m Housing Infrastructure Funding grant to the project including reimbursement of the costs of the Falcon Pub.
- Following further detailed review of South Kilburn budgets ahead of the SDP procurement, £7.3m has been vired from the Regeneration contingency budget to the Neville, Winterleys, Carlton House and Carlton Hall (£3.9m), Carlton and Granville (£2.4m) and other South Kilburn projects (£0.9m) to bring those budgets in line with contractually agreed costs.

- 12.3 The revised capital budget of £353.1m includes new projects approved by Cabinet since Q1 including £13.8m for roads, CCTV and parks (£0.7m of the SCIL award is considered revenue). Since Q1, the Infrastructure and Regeneration Board has approved additional SCIL of £0.4m for the fit outs of Picture Palace (£0.2m) and Roy Smith House community centre under the new SCIL governance arrangements. Other changes from the original budget to the revised budget include brought forward balances from prior year slippage or accelerated spend, reprofiling, removal of budget for schemes not progressing and budget corrections for previously approved schemes.

Corporate Landlord

- 12.4 The Corporate Landlord Board is responsible for overseeing the strategic management and investment in the Civic Centre, Digital Strategy, Libraries and other Council properties. There is a forecast variance of (£0.9m) due to slippage. The largest areas of forecast slippage are £0.5m on Grove Park Pavilion Nursery as officers assess the feasibility of refurbishment options and £0.4m on Digital Strategy due to delays with the commencement of the data lake upgrade programme as further development was required.

Housing

- 12.5 The Housing General Fund is forecasting a variance of (£4.1m) driven by a £4.0m underspend on the Council's LAHF programme. The LAHF scheme provides funding for Brent to acquire local properties for temporary accommodation and resettlement to reduce pressure on future revenue housing budgets. The programme is on track to meet the target 42 properties by the end of the year (23 have already been purchased and 13 are in conveyancing) but with a lower unit mix than the original target. Further underspend has been caused by savings against the price cap. However, refurbishing the properties has taken longer than anticipated meaning that the programme has not had as significant impact on 2025/26 temporary accommodation costs as hoped for.
- 12.6 2025/26 is a critical year for the Council's new home's programme with 889 new affordable homes expected to complete this year. Most projects remain on budget apart from Clock Cottages, which has a £0.8m overspend over the life of the project. A safeguarding bid for additional grant has been submitted to the GLA with an outcome expected shortly. The budget for Claire Court / Watling Gardens has been re-profiled with £7.2m brought into 2025/26 from 2026/27 reflecting a faster than initially forecast completion timetable. On the other hand, £15.2m of the Edgware Road budget for 2025/26 has been reprofiled to future years following the decision to tender for a new contractor in July.
- 12.7 Rising interest and build costs, as well as the current HRA budget position, make further new build development very challenging from a viability perspective. Officers continue to explore alternative ways of meeting Brent's housing needs.

- 12.8 The Housing HRA is forecasting a variance of £3.6m caused by £0.3m accelerated spend and £3.3m overspend on the Kilburn Square refurbishment project. Officers are exploring value engineering opportunities on the Windmill Court refurbishment as a way of mitigating the impact of this overspend.
- 12.9 The Windmill Court and Granville Homes' budgets have been reprofiled to future years to enable the major repairs team to focus on essential fire safety works following the self-referral to the Regulator for Social Housing. The Council has brought in external consultants to review the major repairs programme and ensure that budget is allocated to the most critical areas. Officers are exploring ways of increasing capital available for major repairs without increasing borrowing, which would put more pressure on HRA reserves.

Regeneration

- 12.10 Brent's Regeneration programme plays a vital role in delivering new homes, infrastructure, and community assets that support inclusive growth and long-term sustainability. The programme is currently forecasting a variance of (£8.7m) made up largely of slippage. £7.5m of slippage relates to Wembley Housing Zones due to delays in signing the new building contract for Ujima House in December 2024. £1.0m of slippage relates to the Neasden regeneration project, because TfL have requested a longer timeframe for technical modelling than the original bid timeline.

South Kilburn

- 12.11 The key focus of the South Kilburn regeneration programme at the current time is the procurement of a Single Delivery Partner (SDP). The Council is reviewing the initial bids, and the intention is to invite three bidders to interview. The SDP model is a new way of the Council delivering a major regeneration programme intended to streamline delivery and improve co-ordination, but depending on a single partner and setting a framework for land receipts in advance also carries substantial risks. Officers are working with external development consultants and the GLA to mitigate these risks.
- 12.12 The programme is currently reporting to budget for 2025/26 but with £0.9m underspend offset by £0.9m accelerated spend. The largest area of accelerated spend is £0.4m for Kilburn Open Space as this project is progressing well following Cabinet's decision to award £4.4m SCIL in December 2024. The underspend is driven by William Dunbar and Saville (£1.4m) and Hereford and Exeter (£0.9m) but as these are SDP sites, there are likely to be significant changes to forecasts as the procurement progresses. Whilst the project is forecasting to budget for 2025/26, there is a forecast overspend of £2.3m in future years for the Carlton and Granville development of affordable homes and community space due to project delays and disputes with the contractor.

- 12.13 The South Kilburn Energy Network is currently forecasting to budget. However, initial tenders have returned higher than anticipated bids and work is ongoing to review the viability of the scheme and revise capital budgets.

Children, Young People and Community Development

- 12.14 The Children, Young People and Community Development capital programme has a variance of (£3.1m), consisting solely of slippage. Of this £3.1m, £2.5m relates to the Welsh Harp Post-16 Centre because construction will not start until 2026/27 with only design costs in 2025/26. The budget against the Onside Youth Centre has been removed as this project is not going ahead. Officers are working on proposals for alternative projects to improve youth facilities in the Borough.
- 12.15 A key challenge for the CYP capital programme has been the discovery of unforeseen issues such as ground or building condition issues during building works. This has increased the costs of works so Capital Programme Board approved a budget increase of £0.7m for the Schools Asset Management Programme funded by unallocated Basic Needs and Asset Management Programme grants. The same issue is affecting the project to develop additionally resourced provision for students with Special Educational Needs and Disabilities (SEND), but these developments are still expected to come within the overall project budget.

Public Realm

- 12.16 The Public Realm Board area focusses on improvements to community infrastructure in Brent such as roads, parks and CCTV. As at Q2, the area is forecasting a variance of (£1.1m) driven by £1.0m of slippage. The biggest contributors are the sports pitch improvements (£0.4m) due to changes in procurement law delaying tendering and Northwick Park Pavillion upgrade (£0.3m) due to health and safety issues that need to be addressed before the upgrade can progress.
- 12.17 Accurate forecasting is always particularly challenging in the Public Realm area because of the large number of relatively small projects, project delivery can be impacted by uncontrollable factors such as the weather, and the uncertainty and complexity of grant funding. A particular challenge in 2025/26 will be ramping up spending at speed following the award of £13.8m SCIL funding for capital projects part way through the year. The total revised budget of £36.0m compares to outturn of £18.1m in 2024/25 showing the extent of the delivery challenge.

St Raphael's

- 12.18 As at Q2, St Raphael's is forecast to spend £0.4m, primarily on public realm improvements, compared to a budget of £3.5m. The cause of the slippage as officers are waiting for the outcome of a revised planning application.

Treasury Management Prudential Indicators

- 12.19 In line with changes to the Prudential Code in 2021, the performance of the Council's treasury and capital activities against the approved prudential indicator for the year are now reported quarterly within these financial reports to members. Details of the performance against the indicators in the first quarter of the financial year and compliance with the limits are provided in Appendix B.

13.0 Stakeholder and ward member consultation and engagement

- 13.1 There are no stakeholder and ward member consultation arising from this report.

14.0 Financial Considerations

- 14.1 This report sets 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 2 2025/26. Financial implications of agreeing to this report are included within the forecasts provided.

- 14.2 Under the Business Rates Retention System, a percentage of the income from business rates is retained by Brent Council and the GLA. For 2025/26, the retained share in London is 67%, of which Brent Council's share is 30%. The total cost of awarding discretionary relief to the 6 organisations detailed in Table 14 is £7,209.53 for 2025/26.

15.0 Legal Considerations

- 15.1 The law requires that the council must plan to balance its spending plans against resources to avoid a deficit occurring in any year. Members need to be reasonably satisfied that expenditure is being contained within budget and that the savings for the financial year will be achieved, to ensure that income and expenditure balance (Section 28 Local Government Act 2003: the council's Financial Regulation 2.3 Revenue Budget Monitoring, Forecasting and Overspends).

16.0 Equity, Diversity & Inclusion (EDI) Considerations

- 16.1 There are no EDI considerations arising out of this report.

17.0 Climate Change and Environmental Considerations

- 17.1 There are no climate change or environmental considerations arising out of this report.

18.0 Human Resources/Property Considerations (if appropriate)

- 18.1 There are no HR or property considerations arising out of this report.

19.0 Communication Considerations

19.1 There are no direct communication considerations arising out of this report.

Report sign off:

Minesh Patel

Corporate Director, Finance and Resources

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Appendix A - MTFS Savings Delivery Tracker 2025/26

Department	Reference	Category	Description	2025/26 (£000)	RAG Status	Comments / Mitigating Actions
Service Reform and Strategy	2024-25 CHW01	Service Transformation	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	Amber	There is a slippage against the delivery of this saving. Deployment of new technology is scheduled for October 2025 and May 2026 respectively. Mitigating actions to manage this would be to offset the pressures following reviews from Direct Payment Clawbacks.
Service Reform and Strategy	2024-25 CHW02	Service Transformation	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	Green	On track to be delivered.
Service Reform and Strategy	2024-25 CHW03	Service Transformation	Reducing expenditure in mental health and learning disability including transitions so Brent benchmarks in the middle quartile with comparator authorities	275	Green	On track to be delivered.
Service Reform and Strategy	2025-26 CHW01	Service Transformation	Developing a wider range of day opportunities with partners and communities and reducing building based provision	500	Green	On track to be delivered.
Service Reform and Strategy	2025-26 CHW02	Reduction in provision	Reduction of contract value at 3 year break point for Homeless and ex-offenders	500	Amber	A review is currently underway, however there is a risk that the savings will not be delivered in 2025/26. A mitigation plan is being developed but it is proving to be difficult to reduce activity away from the current contract. Alternative cost reductions are also being explored to mitigate the risk of this slippage.
Service Reform and Strategy	2025-26 CHW03	Service Transformation	Commitment to reducing staffing cost across the Care, Health and Wellbeing Directorate	300	Green	On track to be delivered.

Service Reform and Strategy	2024-25 RS01A	Digital	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	Green	On track to be delivered.
Service Reform and Strategy	2024-25 RS02	Digital	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	Green	On track to be delivered.
Service Reform and Strategy	CHW01 25-26	Service Transformation	Offer reablement service to a wider range of customers, supporting them to remain independent and reduce their reliance on long-term care services.	800	Green	On track to be delivered.
Service Reform and Strategy	CHW02 25-26	Service Transformation	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	Green	On track to be delivered.
Service Reform and Strategy	CHW03 25-26	Digital	Modernise Adult Social Care Approach to Assessment and Review.	200	Green	On track to be delivered.
Service Reform and Strategy	CHW04 25-26	Income generation	Implementation of Telecare Service Charges.	500	Amber	There has been a delay with the implementation of this programme. Charges are due to be introduced on the 1 st of October. The service are reducing costs elsewhere to help to mitigate the impact of this slippage.

Service Reform and Strategy	PHRS01 25-26	Restructure	Staffing efficiencies and contract spend within the Shared Technology service	200	Green	Savings on track to be delivered.
Service Reform and Strategy	PHRS02 25-26A	Restructure	Staffing efficiencies within the Communications, Insight and Innovation department	251	Green	250k savings for SRS is on track to be delivered. £65k savings is for B05063 which is now under Finance & Resources.
Service Reform and Strategy	PHRS03 25-26	Income generation	Increasing commercial income generated from The Drum.	100	Green	Savings on track to be delivered.
Service Reform and Strategy	PHRS07 25- 26A	Restructure	Staffing efficiencies within the Communities and Partnerships Department	4	Green	This has been delivered.
Service Reform and Strategy	LG02 25-26	Procurement	Reduction In Car Club costs.	50	Green	This is on track to be delivered but will need to be monitored to ensure the saving materialises.
Subtotal				4,739		
Children, Young People and Community Development	2024-25 RS01B	Digital	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	Green	Savings on track to be delivered.
Children, Young People and Community Development	2025-26 CYP01	Reduction in provision	Review the Willow Nursery delivery model to ensure the provision is sustainable without funding from the General Fund	250	Green	Savings on track to be delivered.

Children, Young People and Community Development	2025-26 CYP02	Service transformation	Reduction in the placement budget for Looked After Children through operating a new residential children's home in Brent	290	Amber	The care home has not opened as planned due to processing delays with Ofsted. To offset this, we are reducing costs in current residential placements and support costs in other placements.
Children, Young People and Community Development	2025-26 CYP03	Restructure	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	Green	Savings on track to be delivered.
Children, Young People and Community Development	2025-26 CYP04	Income generation	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	Green	Savings on track to be delivered.
Children, Young People and Community Development	2025-26 CYP05	Reduction in provision	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	Green	Savings on track to be delivered.
Children, Young People and Community Development	2025-26 CYP06	Income generation	Reduce general fund contribution to commissioned services that support children's school readiness and health and wellbeing through a joint	500	Green	Savings on track to be delivered.

			commissioning approach within the ICP.			
Children, Young People and Community Development	CYP01 25-26	Reduction in provision	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	Green	Savings on track to be delivered.
Children, Young People and Community Development	CYP02 25-26	Reduction in provision	FPPP: Reduction in discretionary spend of when supporting children and families.	300	Green	Savings on track to be delivered.
Children, Young People and Community Development	CYP03 25-26	Reduction in provision	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	Green	Savings on track to be delivered.
Children, Young People and Community Development	PHRS07 25-26B	Restructure	Staffing efficiencies within the Communities and Partnerships Department.	71	Green	Savings on track to be delivered.
Subtotal				1,995		
Residents and Housing Services	2024-25 RS01D	Digital	Based on 3 complex and 5 simple processes per year across all former Resident Services departments (focusing on transactional services) with	55	Green	On track to be delivered

			efficiencies cashed through reduction in posts and/or increase in income			
Residents and Housing Services	2024-25 RS06	Restructure	Libraries and Heritage realignment of managerial responsibilities and posts. The restructure will focus on maximising income generation and delivering savings in 2025/26.	48	Green	On track to be delivered
Residents and Housing Services	2024-25 RS08A	Digital	To not recruit to vacant posts / move to digital – self-service / reduction in usage of Resilience Contract	33	Green	On track to be delivered
Residents and Housing Services	2024-25 RS09	Digital	Reduction in Benefit Assessment processing costs due to impact of Universal Credit (UC)	61	Green	On track to be delivered
Residents and Housing Services	PHRS04 25-26	Restructure	Achieving management efficiencies across Revenue and Debt, Customer Services and Assessments and Brent Community Hubs.	375	Green	On track to be delivered
Residents and Housing Services	PHRS05 25-26	Restructure	Achieving management efficiencies within Libraries, Arts and Heritage.	50	Green	On track to be delivered
Residents and Housing Services	PHRS06 25-26	Income generation	Increased income across Mortuary & Bereavement Operations (including Cemeteries) and Registration and Nationality.	184	Green	On track to be delivered
Subtotal				806		
Neighbourhoods and Regeneration	2024-25 RS01C	Digital	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	Green	On track to be delivered

Neighbourhoods and Regeneration	2024-25 RS02	Digital	Reduction in business support posts through alignment of support functions across Resident Services, combined with improved forms and integration with back-office systems	27	Green	On track to be delivered
Neighbourhoods and Regeneration	NR01 25-26	Income generation	Increase charge for bulky waste collection from £40 to £55.	30	Green	On track to be delivered
Neighbourhoods and Regeneration	NR02 25-26	Income generation	Increase garden waste annual subscription from £65 to £69.	55	Green	On track to be delivered
Neighbourhoods and Regeneration	NR03 25-26	Income generation	Increase to existing, or introduction of new, charges for additional and replacement waste containers (residual, recycling, food).	105	Green	On track to be delivered
Neighbourhoods and Regeneration	NR04 25-26	Reduction in provision	Stop subscription for Recyclopedia.	6	Green	On track to be delivered
Neighbourhoods and Regeneration	NR05 25-26	Restructure	Transformation restructures across public realm, regeneration and strategic housing.	250	Green	On track to be delivered

Subtotal				506		
Finance and Resources	2025-26 G01	Reduction in provision	There is scope to reduce the amount of administrative support provided within Executive and Member services.	60	Green	On track to be delivered
Finance and Resources	2025-26 G02	Reduction in provision	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	Green	On track to be delivered
Finance and Resources	2025-26 G03	Income generation	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.	24	Green	On track to be delivered
Finance and Resources	2025-26 G04	Reduction in provision	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	Green	On track to be delivered
Finance and Resources	2025-26 G05	Service transformation	A review has identified several underutilised resources across the Governance department and ceasing to subscribe to these will enable savings to be made.	16	Green	On track to be delivered

Finance and Resources	2024-25 RS08B	Digital	To not recruit to vacant posts / move to digital – self-service / reduction in usage of Resilience Contract	33	Green	On track to be delivered
Finance and Resources	FR01 25-26	Restructure	Transformation restructures across Finance and Resources	260	Green	On track to be delivered
Finance and Resources	LG01 25-26	Reduction in provision	Reduction in Members Allowances budget.	50	Green	On track to be delivered
Finance and Resources	LG03 25-26	Procurement	Outsource Occupational Health Service	100	Green	On track to be delivered
Finance and Resources	LG04 25-26	Reduction in provision	Deletion of two Trainee positions in Legal Services	87	Green	On track to be delivered
Finance and Resources	LG05 25-26	Income generation	Increase in income – Legal Services Property and planning.	13	Green	On track to be delivered
Finance and Resources	PHRS02 25-26A	Restructure	Staffing efficiencies within the Communications, Insight and Innovation department	65	Green	On track to be delivered
Subtotal				809		
Overall total				8,855		

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Appendix B –Quarter Two 2025/26 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 2 of 2025/26 (August 2025).

Capital Expenditure & Financing at Q2 2025/26 (£m)	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	Total 2024/25-2027/28
	Actual	Estimated	Estimated	Estimated	Estimated	Estimated	Totals
Corporate Landlord	11.6	11.0	35.1	23.3	2.7	0.6	81.0
Housing GF	71.0	99.4	10.0	21.1	17.5	0.0	201.5
Schools	22.1	23.1	12.7	12.1	3.0	0.0	70.0
Regeneration	34.6	102.3	46.2	27.6	19.0	0.0	210.8
Public Realm	18.0	34.9	9.6	2.0	6.8	0.2	64.5
South Kilburn	20.4	31.0	24.5	17.1	7.0	0.3	93.1
St Raphael's	0.2	0.4	3.1	12.5	3.9	0.0	16.2
HRA	60.9	33.7	18.6	28.0	13.9	11.1	141.1
Total Capital Expenditure	238.8	335.8	160.0	143.7	73.8	12.2	878.3
Financed By:							
Grants	64.7	75.0	23.7	9.1	5.7	0.6	172.5
Section 106	17.1	46.4	29.2	21.2	14.4	0.0	113.9
Capital Receipts	10.0	6.3	9.8	7.8	2.1	0.4	33.9
Earmarked Reserves	0.7	5.3	2.4	1.0	0.9	0.0	9.4
Major Repairs Reserve	16.6	13.7	17.2	18.1	13.9	0.0	65.6
Revenue Contributions	11.6	6.3	3.8	0.6	0.6	0.0	22.3
Borrowing	118.2	182.8	73.9	85.9	36.2	11.2	460.8
Total Capital Financing	238.8	335.8	160.0	143.7	73.8	12.2	878.3

(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 2025/26 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

External resources consist of grants and Developer contributions. Internal resources consist of use of reserves, capital receipts and revenue contributions.

CFR Movement at Q2 2025/26 (£m)	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
	Actual	Estimated	Estimated	Estimated	Estimated	Estimated
Opening CFR	1,254.5	1,357.1	1,520.4	1,573.4	1,639.5	1,657.1
Capital Expenditure	238.8	335.8	160.0	143.7	73.8	12.2
External Resources	(63.9)	(121.4)	(52.9)	(30.3)	(20.1)	(0.6)
Internal Resources	(46.5)	(31.6)	(33.2)	(27.5)	(17.5)	(0.4)
MRP	(24.9)	(18.6)	(19.8)	(18.5)	(17.2)	(16.0)
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
Accounting Adjustments	0.0	0.0	0.0	0.0	0.0	0.0
Closing CFR	1,357.1	1,520.4	1,573.4	1,639.5	1,657.1	1,650.8

(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 2025/26.

Gross Debt & the Capital Financing Requirement at Q2 2025/26 (£m)	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
	Actual	Estimated	Estimated	Estimated	Estimated	Estimated
External Loans	900.0	1,081.0	1,089.0	1,138.9	1,145.3	1,126.8
PFI & Leases	32.5	28.5	24.7	22.7	20.4	17.0
Total External Debt Liabilities	932.5	1,109.5	1,113.6	1,161.6	1,165.6	1,143.9
Internal Borrowing	424.6	410.9	459.8	477.9	491.5	506.9
Capital Financing Requirement	1,357.1	1,520.4	1,573.4	1,639.5	1,657.1	1,650.8

(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 2025/26 (£m)	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
	Actual	Estimated	Estimated	Estimated	Estimated	Estimated
CFR	1,357.1	1,520.4	1,573.4	1,639.5	1,657.1	1,650.8
LOBO Loans	59.5	24.5	15.0	5.0	5.0	5.0
Non LOBO Loans	840.5	801.8	745.1	715.4	685.7	656.0
Balance Sheet Resources	(616.7)	(615.7)	(614.7)	(613.7)	(612.7)	(611.7)
Net Loan Requirement	852.7	806.3	740.1	700.4	670.7	641.0
Plus Liquidity Allowance	20.0	20.0	20.0	20.0	20.0	20.0
Liability Benchmark	872.7	826.3	760.1	720.4	690.7	661.0

(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 2025/26 (£m)	2025/26	2026/27	2027/28	2028/29	2029/30
Authorised Limit	1,800.0	1,900.0	1,900.0	1,900.0	1,900.0
Operational Boundary	1,600.0	1,700.0	1,700.0	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 2025/26.

(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 2025/26 (£m)	2025/26	2025/26
	Approved Limit	Actual
Upper limit on one-year revenue impact of a 1% rise in interest rates	5.0	0.5
Compliance with limits:		Yes
Upper limit on one-year revenue impact of a 1% fall in interest rates	5.0	(0.5)
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 2025/26	Upper Limit	Lower limit	2025/26	2025/26	2025/26	2025/26	2025/26
			Actual Borrowing 31.08.2025	Actual Borrowing 31.08.2025	Forecast Borrowing at 31.03.2026	Forecast Borrowing at 31.03.2026	Compliance with limits
	%	%	£m	%	£m	%	
Under 12 months	40	0	92.80	9.88%	66.21	8.01%	Yes
12 months & within 24 months	40	0	48.70	5.19%	39.71	4.81%	Yes
24 months and within 5 years	40	0	65.20	6.94%	59.43	7.19%	Yes
5 years and within 10 years	60	0	275.10	29.30%	136.05	16.46%	Yes
10 years and within 20 years	75	0	41.50	4.42%	109.31	13.23%	Yes
20 years and within 30 years	75	0	150.70	16.05%	150.69	18.24%	Yes
30 years and within 40 years	75	0	159.90	17.03%	159.91	19.35%	Yes
Over 40 years	75	0	105.00	11.18%	105.00	12.71%	Yes
Total			938.90	100.00%	826.31	100.00%	

(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 2025/26	Limit	Forecast	Forecast	Forecast	Forecast	Forecast
	2025/26	2025/26	2026/27	2027/28	2028/29	2029/30
Financing Costs (Interest & MRP) (£m)	35	33.0	37.6	36.0	36.6	35.2
Net Revenue Stream (£m)	431.4	431.4	431.4	448.7	465.8	483.8
Proportion of net revenue stream (%)	8.11%	7.65%	8.72%	8.02%	7.86%	7.28%

Financing costs can be further broken down as follows.

Capital Financing Costs at Q2 2025/26 (£m)	2025/26	2026/27	2027/28	2028/29	2029/30
	Estimated	Estimated	Estimated	Estimated	Estimated
Total Gross External Debt Interest	51.5	57.5	59.9	60.1	59.6
Total Interest Payable & Expenses	53.3	58.7	61	61.3	60.8
Total Interest Receivable	-29.9	-32	-35.9	-37.4	-38
Net Interest	23.4	26.7	25.1	23.9	22.8
MRP (Excluding PFI)	9.6	10.9	10.9	12.7	12.4
Total Interest & MRP	33.0	37.6	36.0	36.6	35.2
Revenue Contributions to Capital Programme	8.6	3.5	3.5	3.5	3.5
Total Capital Financing Costs	41.6	41.1	39.5	40.1	38.7

(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 because of the Council having to seek early repayment of the sums invested.

Upper Limit for Total Principal Sums invested over 364 Days at Q2 2025/26 (£m)	2025/26	2025/26
	Approved	Actual
Upper Limit for Total Principal Sums Invested Over 364 Days	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 2025/26	2025/26	2025/26
	Approved	Actual
Portfolio average credit rating	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 2025/26 (£m)	2025/26	2025/26
	Approved	Actual
Total cash available within 3 months	20.0	49.9

(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 2025/26, whilst treasury investments are managed under the Treasury Management Strategy 2025/26.

Total Investment Exposure Indicator at Q2 2025/26 (£m)	2025/26	2026/27	2027/28	2028/29	2029/30
	Estimated	Estimated	Estimated	Estimated	Estimated
Treasury management cash investments	20.0	20.0	20.0	20.0	20.0
Service investments	323.4	322.2	321.0	319.7	318.3
Commercial investments: Property	0.0	0.0	0.0	0.0	0.0
Total Investments	343.4	342.2	341.0	339.7	338.3
Commitments to lend	50.0	50.0	50.0	0.0	0.0
Total Exposure	393.4	392.2	391.0	339.7	338.3

Service investments are further broken down in the table below.

Loans & Investments for service purposes: Category of borrower at Q2 2025/26 (£m)	2025/26	2025/26	2026/27	2027/28	2028/29	2029/30
	Approved Limit	Estimated	Estimated	Estimated	Estimated	Estimated
I4B Subsidiary Loans	500.0	222.4	222.4	222.4	222.4	222.4
I4B Subsidiary Equity		36.4	36.4	36.4	36.4	36.4
FWH Subsidiary Loans		33.4	32.9	32.5	32.0	31.5
Local Businesses	10.0	0.0	0.0	0.0	0.0	0.0
Schools, Academies and Colleges	55.0	17.4	17.1	16.8	16.5	16.2
West London Waste Authority	20.0	13.9	13.5	13.0	12.4	11.8
Local Charities	10.0	0	0	0	0	0
Housing Associations	50.0	0	0	0	0	0
Local Residents	5.0	0	0	0	0	0

Total	650.0	323.4	322.2	321.0	319.7	318.3
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(l) Investment Funding

This indicator demonstrates the amount of exposure to borrowing because 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 2025/26 (£m)	2025/26	2026/27	2027/28	2027/28	2028/29	2029/30
	Estimated	Estimated	Estimated	Estimated	Estimated	Estimated
I4B Loans	222.4	222.4	222.4	222.4	222.4	222.4
I4B Equity	36.4	36.4	36.4	36.4	36.4	36.4
First Wave Housing (FWH)	33.4	32.9	32.5	32.5	32.0	31.5
Total Service investments	292.1	291.7	291.2	291.2	290.8	290.3
Total Funded by Borrowing	292.1	291.7	291.2	291.2	290.8	290.3

(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 2025/26	2025/26	2025/26	2026/27	2027/28	2028/29	2029/30
	Limit	Estimated	Estimated	Estimated	Estimated	Estimated
Treasury management investments	3.94%	3.94%	3.75%	3.75%	3.75%	3.75%
Service investments	2.6%	2.6%	2.6%	2.6%	2.6%	2.6%

(n) Other Investment Indicators

Other investment indicators	2025/26	2026/27	2027/28	2028/29	2029/30
	Estimated	Estimated	Estimated	Estimated	Estimated
External Debt (Loans)	1,220.0	1,311.6	1,321.0	1,313.4	1,289.1
Net Service Expenditure	431.4	448.7	465.8	483.8	483.8
Debt to net service expenditure ratio	2.8	2.9	2.8	2.7	2.7

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	Cabinet 13 October 2025
	Report from the Corporate Director of Children, Young People and Community Development
	Lead Member – Cabinet Member for Children, Young People & Schools (Councillor Gwen Grahl)
Brent Youth Justice Plan 2025/28	

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: Brent Youth Justice Plan 2025-28
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Palvinder Kudhail, Director, Early Help and Social Care Palvinder.kudhail@brent.gov.uk Serita Kwofie, Head of Early Help 020 8937 1747 Email: serita.kwofie@brent.gov.uk

1.0 Executive Summary

- 1.1. This report provides a brief overview of the purpose and rationale for creating the Brent Youth Justice Plan 2025-28. It additionally describes how youth justice provision in Brent contributes to strategic and Borough Plan priorities, and outlines the partnership aims and commitments that will shape the Brent Youth Justice Service (YJS) partnership in the next three years.

2.0 Recommendation(s)

- 2.1 That Cabinet considers the content of the Brent Youth Justice Plan 2025/28.
- 2.2 That Cabinet provides agreement for the Brent Youth Justice Plan 2025/28 to be presented to Full Council for formal sign-off and adoption.

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 This report presents the Draft Brent Youth Justice Plan 2025/28 and celebrates the commitment and achievements of our Youth Justice Service (YJS) and the wider partnership to support children and young people who are risk of or have entered the youth justice system. This is the first three-year version of the Brent Youth Justice Plan. As such it provides a more comprehensive approach to planning and delivering services than was possible in the annual versions that shaped the provision of youth justice services in Brent during the last 20 years.
- 3.1.2 Performance remains strong overall, particularly in respect of the reduction in young people entering the criminal justice system for the first time. These numbers have been falling for more than a decade, at a national and local level. The number of First Time Entrants (FTE) has now plateaued and most recently totalled 70 in the period April 2024 to March 2025. This is comparable to both our statistical family and the London rate of FTEs.
- 3.1.3 It is equally pleasing that the number of children sentenced to custody in 2024/25 was significantly less than the London and statistical family average. This is due to the strong focus on prevention and engagement with children and young people so that their views are heard and interventions are personalised to their needs and environment. Work on reducing the disproportionate number of young people in the criminal justice system from Black backgrounds continues with rigour and pace.
- 3.1.4 I am heartened by the feedback of the voice of the young people through surveys and individual engagement and wish to highlight these areas:
- 94% (64) believe their case manager understands what has happened in their life.
 - 96% (65) said they had their court order explained to them by the YJS officer.
 - 97% (66) were offered an opportunity to engage in positive activities whilst in contact with the YJS.
 - 100% felt listened to by their case manager.
 - 99% (67) felt satisfied with the work that the case manager had completed with them.
 - When asked what has worked well or made the biggest difference, one respondent stated: 'I am not the person I was 2 years ago and that is a good thing.'
 - 100% said that their case manager has encouraged them to think about their future.
 - 99% (67) said that the case manager contacted them on the date and time expected for their session each week.
- 3.1.5 I would like to thank all the staff working for our Youth Justice Service for their hard work, diligence and innovation supporting young people, in what continues to be a challenging economic landscape.

- 3.1.6 The Youth Justice Plan 2025-2028 is closely aligned to three priorities within the Borough Plan 2023-27 as well as the strategies outlined below:

Thriving Communities

Brent Youth Justice Service (YJS) is working closely with community partners to make Brent safer. This includes delivering Your Life You Choose sessions, and other preventative workshops in schools in partnership with the Targeted Prevention Hub (Early Help), Willesden Magistrates Court, the Police, and the local voluntary sector. Unlocking Your Potential groupwork sessions led by YJS introduce young people to inspirational members from local and wider London communities. YJS also supports young people to access positive recreational activities at Family Wellbeing Centres.

The Best Start in Life

Young people within the Brent youth justice system are seen and heard. A trauma informed approach to supporting children is embedded within YJS. Supported by a YJS Participation Officer, children and young people communicate with members of the YJS Management Board via a range of multi-media platforms including podcasts and short films. Joint work undertaken with the Brent Community Safety Team includes exploring options for broadening Brent's mentoring offer to young people affected by gangs and other forms of criminal exploitation, and the ongoing provision of early intervention preventative support to children and young people who receive the police issued Triage Out of Court Disposal.

Healthier Brent

Young people known to criminal justice services often have poor access to mental health provision. An NHS funded Youth Liaison and Diversion Officer, based within the YJS offers mental health screening to children who attend police custody. A co-located CAMHS Mental Health Practitioner offers a range of support and refers those with more complex needs for specialist CAMHS support.

Brent Youth Strategy

The Youth Justice Plan 2025-28 is aligned to the Brent Youth Strategy 2025-28 which includes youth participation, contextual safeguarding risk management, and the provision of educational support to children not in employment, education, and training.

The Brent Equity, Diversity, and Inclusion Strategy 2024 – 2028

Brent YJS is committed to tackling inequalities which includes the added strand of work which focuses on disproportionality. The service's work is closely aligned to the Brent Equity, Diversity, and Inclusion Strategy 2024/28.

3.2 Background

- 3.2.1 The YJS is a multi-disciplinary, multi-agency service that works with children and young people aged 10-17 years and their families. Brent YJS provides support in relation to out-of-court disposals, court work, bail and remands, the assessment of children and young people who offend, the provision of court reports, the planning and delivery of community interventions, and custody and resettlement. The YJS sits within the Children, Young People and Community Development directorate and is managed by the Head of Early Help.
- 3.2.2 Local authorities have a statutory duty to provide the Youth Justice Board (YJB), with a previously annual, but now three-year Youth Justice Plan that sets out how youth justice services are funded, operate, and function. They provide an opportunity to review performance and developments and plan for the next three years. This allows services to be able to respond to any changes that have taken place prior, including new legislation, demographic changes, delivery of key performance indicators (KPIs) and developments in service delivery.
- 3.2.3 Updated guidance to youth justice services, first published in March 2023 and revised in March 2024, introduced the requirement that plans must be signed off by Full Council in accordance with Regulation 4 of the 'Local Authorities (Functions and Responsibilities) (England) Regulations 2000'.
- 3.2.4 Content in the Draft Brent Youth Justice Plan 2025/28 is presented in line with Youth Justice Board guidance. This information is analysed by the YJB to ensure compliance with statutory and financial requirements. Youth Justice Plans also serve to identify good practice capable of being replicated regionally and nationally.
- 3.2.5 The Brent Youth Justice Plan 2025/28 contains statistical information about children in Brent, with a specific focus on those children within, or at risk of entering, the youth justice system. Brent is committed to the priorities outlined in the YJB Strategic Plan 2024-27, Thematic and Area Based Inspection recommendations, and local practice approaches. In keeping with this, the following are the principal aims and commitments that will shape the Brent YJS partnership over the next three years:
- Embed the new Targeted Prevention Hub (TPH) within Brent.
 - Develop ever closer links with the voluntary and community sector – to include the ongoing identification of partners to join the TPH.
 - Implement and manage new substance misuse arrangements within Brent.
 - Embed new Appropriate Adult arrangements within Brent.
 - Increase access to victim support.
 - Work with partners to develop pathways and create access for Speech and Language Therapy.

- Refresh, implement, and monitor the Brent YJS Disproportionality Action Plan to tackle the over representation of children from Black Heritage Groups in the Brent Youth Justice System.
- Support the delivery of the Brent Youth Strategy.
- Collaborate with children's social care services to reduce the risks of criminalisation of children in care and care leavers.
- Continue to promote evidence-based 'Child First' approaches as the best means to reducing victims, promoting public protection, keeping communities safe and supporting children towards positive outcomes.
- Support the MPS Children's Strategy recommendations to help keep children in London safe, build their trust and bring to justice those who abuse and exploit them.
- Continue to build a YJS partnership culture that encourages diversity in its workforce, promotes anti-racist practice in its thinking and inclusivity, is supportive, encourages personal responsibility and is outcomes focused.
- Continue work within the YJS Management Board, the wider partnership, and YJS staff to prepare for the current round of HMIP Inspection, through a focused programme of case file audits, thematic practice development sessions and individual supervision.
- Broaden access to mentoring with clear referral pathways.
- Develop a plan to expand the remit of the service to care leavers involved in the criminal justice system

4.0 Stakeholder and ward member consultation and engagement

- 4.1 The Brent Youth Justice Plan 2025/28 was approved by the Brent Youth Justice Service Management Board on 24 July 2025.
- 4.2 The Brent Youth Justice Plan 2025/28 was presented to the Community and Wellbeing Scrutiny Committee on 17 September 2025.
- 4.3 The Brent Youth Justice Plan 2025/28 was sent to the Youth Justice Board
- 4.4 The Brent Youth Justice Plan 2025/28 will be presented to The Safer Brent Partnership Board – for information.

5.0 Financial Considerations

- 5.1 The commitments and activities of the Youth Justice Plan are funded from the Partnership Budget that includes cash and in-kind contributions from a number of partners including the Police and the Health Service. The total partnership budget is expected to be £1.7m including £579k grant from the Youth Justice Board.
- 5.2 The Council's financial contribution in 2025/26 has been reduced by £105K to £735k to meet savings targets. The savings have been delivered through the deletion of two vacant posts.

- 5.3 It is expected that the aims and commitments of the Partnership during the next three years included in paragraph 3.7 will be delivered within existing resources. Any potential impact on service capacity as a result of the savings described in paragraph 5.2 and reduction in grant funding or in-kind contributions, will need to be absorbed within the Partnership.

6.0 Legal Considerations

- 6.1 The Crime and Disorder Act 1998 introduced a requirement that all local authorities must establish a Youth Offending Team (YOT) comprising members from the police, social services, probation, health and education. Most local authorities, including Brent, have renamed YOT provision as Youth Justice Services.
- 6.2 The Act also created the Youth Justice Board to oversee and monitor youth justice services in England and Wales. One of the YJB's key functions is to provide local authorities with funding to enable YOTs to deliver statutory services.
- 6.3 Section 40 of the Crime and Disorder Act 1998 places a statutory duty on local authorities to submit an annual youth justice plan.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 The proposed Youth Justice Plan 2025-2028 supports Brent Council's commitment to equality equity, diversity, and inclusion. It is also in compliant with the statutory duties under the Equality Act 2010. Brent YJS considers all individuals when conducting their day-to-day work. This includes YJS Management Board oversight of YJS work to reduce the overrepresentation of children from Black Heritage groups in the youth justice system, child-centred operational policies, and a commitment to trauma informed work practices.
- 7.2 Brent YJS seeks to reduce health inequalities through the provision of good assessment and intervention planning for all children who enter the local youth justice system. This includes referral to substance misuse services, CAMHS, and CNWL mental health screening.

8.0 Climate Change and Environmental Considerations

- 8.1 The Draft Brent Youth Justice Plan 2025/28 details efforts to encourage young people within the youth justice system to share their views and opinions on issues of most relevance to them.
- 8.2 Youth participation and co-production is an evolving initiative within the Youth Justice Service. This work is aligned to the Brent Climate and Ecological Emergency Strategy 2021-2030, which aims to equip children and young people with the skills and opportunities needed to take action to protect the environment and tackle climate change.

9.0 Human Resources/Property Considerations (if appropriate)

9.1 No additional considerations to note.

10.0 Communication Considerations

10.1 The Brent Youth Justice Plan 2025/28 will be shared with all services and organisations represented on the Youth Justice Service Management Board.

Report sign off:

Nigel Chapman

Corporate Director of Children, Young People and
Community Development

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Brent Youth Justice Plan 2025-2028

1.0 Introduction

The Youth Justice Plan 2025-2028 (YJP) is a statutory requirement under Section 40 of the Crime and Disorder Act 1998 relating to the provision of youth justice services. Brent's new 3-year plan reviews progress made over the last 12 months and outlines our priorities and plans for the next three-years. Our planning is realistic, achievable and inspires confidence that we are well placed to build upon the gains made over the last ten-years. These include falling numbers of first-time entrants, a declining custodial population, and reductions to our reoffending rates. Our YJP also sets out how the Brent Youth Justice Service (YJS) operates, how it is funded, and provides details of our governance arrangements.

2.0 Recommendation(s)

- i. That the Brent YJS Management Board supports, enables, and monitors delivery of the Brent Youth Justice Plan 2025-2028.
- ii. Brent Youth Justice Plan 2025-2028 progress is reviewed and recorded annually and shared with the Youth Justice Board, Brent YJS Management Board and other governing authorities as directed on or before 30 June annually.
- iii. Youth Justice Partner organisations support the Brent Youth Justice Service to achieve the aims outlined in the Plan.

3.0 Vision and Strategy

View from the Chair of the Brent YJS Management Board: *'Our continuous drive to be the best we can be'.*

We hope you will enjoy reading our review of the last year and our plans for the next 3 years. The Brent Youth Justice Plan 2025-2028 outlines our work addressing the individual and often complex needs of children and young people who have entered, or are at risk of entering, the local youth justice system. In 2024, this totalled 201 children (0.6%) of the Brent 10-17 population who received 289 youth justice disposals:

Brent Youth Justice Plan 2025-2028

Table 1. No. of children supported by Brent YJS by disposal in 2024

Type of disposals	No. of Children
Court Sentence	98
Out Of Court Disposals	59
Turnaround Programme	38
Remand / Bail support programme	6
Total	201

We are proud of our achievements which include the integration of child first principles into our daily work, the progress we have made to reduce reoffending and first-time entrants into the youth justice system, and our continued commitment to addressing the overrepresentation of children from Black heritage groups supported by Brent YJS.

On a Departmental level it has been both a very busy and extremely productive year. In April 2024, Brent Council's Early Help and Social Care Directorate embarked on a new redesign programme to better support more holistic, joined up working and ensure we have a modern, fit for purpose service model, in line with the Government's Families First reform programme. Throughout the process, we engaged with staff across Early Help and Social Care to get a strong understanding of their experience within the existing operating model, and the key issues that they wanted to be addressed in the new model. Following these sessions, a proposed Target Operating Model was approved by OCSLT and was taken forward for formal consultation with staff in January 2025.

Thanks to the considerable help and support we received from staff across CYP we have developed a new model which brings together non-statutory Family Support Workers with Children's Social Workers in seven teams, each aligned to a Family Wellbeing Centre. Over time, Family Support Workers will receive training to begin to complete Child and Family Assessments under the guidance and supervision of a Social Worker. These teams will oversee all Family Support and Child in Need work. New Child Protection Teams will also be established, made up of Social Workers who will oversee caseloads of Child Protection, Section 47, Interim Care Order, Supervision Orders and Care Proceedings cases.

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Brent YJS and the Community Safety Team have long worked closely to identify and support services that combat antisocial behaviour, serious youth violence, knife crime, and county lines. Existing close collaborations were strengthened further when the service was repositioned in April 2025 within the widened Children, Young People and Community Development Department (CYPCD). Both services are committed to jointly promoting engagement with local communities and victims on the development of local youth justice services.

The development of our new Targeted Prevention Hub (TPH) is of particular relevance to Brent YJS. Located within the Brent Youth and Youth Justice Service and managed by the Youth and Youth Justice Manager (reporting to the Head of Service Early Help), the TPH will bring together existing adolescent-focused resources across Early Help and Social Care to support children and young people across all areas of the child's journey, starting at the point of referral. The TPH also includes the development of a Family Group Conference Service. The TPH is due to be launched in stages from June 2025.

The child-centred workplace culture that is so evident in Brent YJS will be incorporated into TPH through modelling the revised ways of working: *This is Brent CYP - This is How We Grow*. This ensures that all service development conforms to our common values of Contribution to Society, Integrity, Creativity and Achievement. It also encourages all staff to remain Curious, Courageous and Kind in all aspects of our work, including anti-racist practice. Our quality assurance tools continue to evolve and now include a reflective supervision template and enhanced requirements for robust management oversight.

In terms of our workforce development, it is important we recruit the right staff who will go the extra mile to safeguard children and work co-productively with them to improve outcomes. We provide a supportive, compassionate, and positive work environment that nurtures talent, values all contributions equally and strives for excellence where everyone is accountable for the delivery of their work. This is key to collaborating with the Youth Justice Board (YJB) to deliver the three strategic objectives outlined in the Youth Justice Board Strategy 2024-2027:

1. Supporting the improvement of youth justice services in local communities.
2. Focusing on addressing persistent racial disparities across the youth justice system.
3. Influencing the development of policy and practice to advance the adoption of Child First principles throughout the youth justice system.

Brent's operational responsibilities have remained broadly similar in their focus since they were introduced by the Crime and Disorder Act 1998. This required each local authority in England and Wales to deliver youth justice

Brent Youth Justice Plan 2025-2028

services in line with a statutory framework outlining youth justice responsibilities in relation to out of court disposals, court work, bail and remand, the assessment of children and young people who offend, the provision of court reports, the delivery of community interventions, and custody and resettlement.

Our approach to delivering youth justice services shares much in common with the Child-First ambitions announced by the Youth Justice Board in 2021 and re-emphasised in their Strategy Plan for 2024-2027. These are to deliver positive outcomes for children by reducing offending and creating safer communities. We see children as children first, treat them fairly and help them to build on their strengths so they can make a constructive contribution to society as responsible citizens. It is also a method that provides Brent YJS with the necessary means to achieve its principal statutory aims:

- Reducing the likelihood of children offending or re-offending
- Protecting children and young people
- Protecting the public
- Ensuring that sentences are served.

During 2024/25, we performed strongly across several key areas:

Re-offending

Re-offending rates are prone to fluctuation and tracked over a period of 18 months. The low rates of reoffending that Brent has experienced in recent years is likely to have been influenced by the considerable programme of preventative work undertaken at this time. This included the COVID-19 Pathfinder for Overrepresented Children, the MOPAC Funded Disproportionality Project, and the Your Choice cognitive behavioural therapy programme. The establishment of TPH provides renewed confidence that our reoffending rates will maintain their downwards trajectory.

Custody & Remands

Our custodial population is at a historical low. This has been influenced by our work to tackle disproportionality in the youth justice system, the implementation of the Constructive Resettlement approach, effective interventions, and multi-agency oversight including At Risk of Custody meetings.

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First Time Entrants

The number of children entering the Youth Justice System has also been falling for more than a decade. To a real extent this has reflected the effective planning, and decision making, and wide-ranging interventions offered by the YJS Out of Court Disposal team.

Out Of Court Disposals

Our procedures and processes highlight the voice of the victim, and promote our restorative justice offer. Work undertaken in partnership with the Police and the YJS Out of Court Disposal team is truly collaborative and focused on achieving fair and good outcomes for all children and young people. In 2024 we introduced the YJB Prevention and Diversion Assessment Tool to make our assessments even more child-first and to ensure interventions are needs led. The number of police referrals to the Out of Court Disposal Team is predicted to increase significantly during the life of this plan due to the strategic commitment to child-first policing made by the Metropolitan Police in April 2025.

Disproportionality

Our Disproportionality Action Plan is refreshed annually and is reflected throughout the work of the YJS. It is regularly monitored by the YJS Management Board and contains wide-ranging actions across the partnership. In 2024 we conducted an analysis of our Police diversionary interventions which showed that whilst children from Black Heritage Groups in Brent have access to OOCs, they remain under-represented when compared to children from White Heritage groups. Furthermore, children from Black Heritage groups are more likely to receive 1st tier outcomes and thus more likely to be when compared to children from White Heritage Groups. We will build upon this throughout 2025-2028 by seeking to understand whether disproportionate access to OOCs the result of child-first policing or the product of children from Black Heritage groups being subjected to disproportionately high Police attention.

Violence and Gangs

We are committed to safeguarding young people affected by gangs and violence by understanding their challenges through a trauma informed lens and responding to neurodiverse needs. Serious Youth Violence has declined year on year since 2016/17 (66 SYV offences in the year 2016/17 to 37 in 2024/25, which is 44% decrease) - although within this cohort there has been an increase in the proportion of both robbery offences and knife crime for this cohort. For this reason, safety mapping is undertaken with all children supported by the YJS to better understand the harm they are exposed to in the community and where necessary plan how they can work safely with the YJS.

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Courts

We receive a considerable amount of positive feedback from our Magistrates at Willesden Youth Court about the quality of our court reports and our knowledge of the children who appear before the Youth Bench. Our approach to sharing court facilities with Barnet and Harrow is collaborative and ensures all children are given the best possible opportunity to receive a fair outcome regardless of where they live. We are fortunate that our judiciary supports our continual strive for improvements in many ways which has included the adoption of trauma informed court reports and bail letters.

Participation

The voices of children and their families are heard and used to develop and shape service provision. YJS workers interact with our children and young people with increasing creativity. This has included YJS children sharing short films made by Brent children with the YJS Management Board, working in partnership with the Raheem Sterling Foundation, and sharing youth insights on crime and disorder with the Police during Community Safety Team Roundtable discussions, and conducting annual surveys with Brent children and their parents and carers.

Partnership and joint working

The growing proportion of high-risk children and young people on our caseloads has resulted in a growing reliance on good partnership work and close collaborations with wider Council services. We continue to extend our partnership with the local voluntary sector to provide access to existing and newly emerging preventative support. The new TPH will further strengthen our joint working.

Restorative Justice

Our determination to support victims through direct and indirect mediation is underpinned by our Restorative Justice Policy. It is particularly pleasing that our YJS Restorative Justice Workers convened our first face to face Restorative Justice Conference in 2024. It is hoped that new arrangements introduced by the Police will significantly increase our ability to directly encourage victims to engage in restorative justice.

The YJS Management Board will focus on the following in 2025/26:

Council Services

Children's Social Care

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Safeguarding children and young people from serious youth violence and risk outside the home is central to our work. Brent YJS will continue to jointly take forward our plans to reduce the criminalisation of children in care in collaboration with our Looked After Children, Leaving Care, Family Support and Child Protection and Court Teams.

Ongoing work undertaken with our early help and social care teams to keep children safe, such as peer mapping and supporting children at court, will be enhanced by the establishment of the Brent Contextual Safeguarding and Violence Reduction Strategic Group (CSVRSRG). Introduced in May 2025, the purpose of CSVRSRG is to understand the profile of our most vulnerable and at-risk residents, oversee themes and trends and develop interventions to make individuals and Brent residents safer. The CSVRSRG supports the Safer Brent Partnership to achieve the priorities of the Safer Brent Strategy to tackle violent crime, challenge domestic abuse and sexual abuse and prevent violence against women and girls, focus on incidents impacting our community, and protect the most vulnerable.

Community Safety Team

Brent YJS and the Community Safety Team have long worked closely to identify and support services that combat antisocial behaviour, serious youth violence, knife crime, and county lines. Existing close collaborations were strengthened further when the service was repositioned in April 2025 within the widened Children, Young People and Community Development Department (CYP CD).

Both services are committed to jointly promoting engagement with local communities and victims on the development of local youth justice services. This includes working together to include mentoring provision for YJS children as part of 2026-2029 commissioning arrangements and delivering one of the priorities in the Overarching Safer Brent Action Plan 2024-2026: facilitating *Roundtable* conversations between children known to the Police and key stakeholders.

Improving Educational Outcomes

YJS will continue to increase participation for those young people out of school. We have increased educational staffing resources to 2.0 FTE Prospects Careers Advisors, and this is complemented by one PLIAS Resettlement Worker who offers community-based support, advice and guidance to young people with criminal convictions. This combined with close oversight from the YJS NEET Working Group provides the tools and resources needed to reduce the number of children known to YJS who are not in employment, education or training (NEET). YJS will continue to deliver preventative workshops to mainstream and alternative schools. This will include working in partnership with our newly formed TPH to deliver the Your Life You Choose programme. This is a multi-agency presentation day which seeks to deter school students from crime, raise awareness of the consequences of their choices and empower them to make better decisions and keep themselves safe.

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Victims

We continue to work collaboratively with colleagues in our Looked After Children and Leaving Care Services to reduce the unnecessary criminalisation of children living in supported accommodation by raising awareness about alternatives to reporting low level crime. This includes referral to our restorative justice offer which is open to all victims of crime and includes both direct and indirect mediation. Brent YJS has built upon plans to extend its reparations offer and now undertakes reparative work at Family Wellbeing Centres and the church-based Dementia Café. Our children and young people also exhibited significant painting and decorating flair as part of new reparations programme which has revamped the SEND area at Stonebridge Primary School. Victim's work is predicted to expand significantly following the recent decision from the Metropolitan Police to allow YJS' to have greater direct access to victims.

Public Health

We continue to work closely with Public Health. Work undertaken last year paved the way for the creation of newly revamped substance misuse provision pathways. Introduced in April this year, all children who receive Police Out of Court Disposals can access support from VIA, a voluntary sector provider that specialises in substance misuse provision for children and young people in Brent. To promote ever closer working between Brent YJS and VIA, the two organisations held a service wide meeting in May this year, that enabled practitioners to identify service improvements and new ways of working - which include a commitment to offer groupwork. This work dovetails with TPH plans to extend access to Public Health initiatives that support the physical and emotional health of children, especially those who are missing or excluded from school, or misusing drugs and alcohol.

Partnership Services

Courts

We will improve the court experience and outcomes for children through ever closer working with Court Services partners. Issues of disproportionality affecting children from Black heritage Groups will continue to be tackled. More widely we will build upon our work to enable all children to better understand what will happen at court and facilitate their active participation in ensuring they are involved and listened to during court proceedings.

Probation

The partnership between Brent YJS and the Brent Probation Delivery Unit (PDU) is strong. For many years this has enabled Brent YJS to benefit from the provision of effective staffing resources and operational processes that ensure our children transition seamlessly from the youth justice system into adult services.

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Voluntary Sector

The continued sharing of community wide knowledge is vital to achieving good outcomes for children. This includes information shared by the Young Brent Foundation at Management Board meetings relating to contextual safeguarding, deprivation and the quality and sufficiency of safe spaces and activities for children and young people.

Brent YJS will continue to access to the broad range of youth provision offered by the Violence Reduction Unit funded *I Am Brent* consortium.

Improved Mental Health and Wellbeing

The Brent YJS Mental Health Practitioner seconded from the CAMHS Enhanced Treatment Team will continue to provide onward referral, advice and support for all children likely to require Tier 3 specialised CAMHS interventions. YJS Case Managers holding cases where children are suspected to possess less acute mental health needs can access general advice and guidance about emotional wellbeing and other community support from the Brent Centre for Young People and TPH.

Police

We will assist the Police to ensure the safety of children and better protect the public. This will include the ongoing delivery of Police led Victim Awareness and Crime Prevention group work sessions, Police One to One sessions with children and young people supported by YJS, and the joint sharing of risk and safety information between YJS and the Police. YJS will continue to support the Police to implement the child-centred ambitions contained within the new MPS Children Strategy, by identifying new opportunities to listen to and respond to the voices of children. Supporting the Community Safety Team to facilitate Roundtable events between YJS children and the Police.

National Strategy and Emerging Good Practice: the YJB and HMIP

Overall, the plans and priorities of Brent YJS will continue to be guided by good practice outlined in the *YJB Youth Justice Strategy for delivering positive outcomes for children by reducing offending and creating safer communities* (2024–2027), and recommendations made in recent HMIP thematic and area-based inspections. These include: *The experiences of Black and mixed heritage boys in the youth justice system* (October 2021), the *Joint thematic inspection of work with children subject to remand in youth detention* (November 2023), the *HMIP Annual Report 2023: inspection of youth justice services* (Sept 24). *Standards for children in the justice system: 2023 to 2024 audit* (Feb 25), *Multi-agency responses to serious youth violence: working together to support and protect children* (Nov 24), and *Children and families' experiences of multi-agency support when impacted by serious youth violence* (Nov 24).

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As in previous years we will continue to learn from case audits, Serious Case Reviews, Key Performance Information data, through engagement with children, young people, and their families, and through case presentations at Board meetings. Furthermore, our commitment to improving outcomes for children in the Brent youth justice system will continue to shape our resourcing and focus. We believe that despite the passage of time the comments made by HMIP in our 2020 inspection report still apply: ‘...overall, Board members know how their service contributes to the work of the YJS and can judge if their service’s contribution is effective’. This 3-year Plan provides the Brent Youth justice partnership with the clarity needed to work together to achieve good outcomes for children, it also provides a very clear framework to provide strategic oversight, guidance and the support needed to improve the lives of children and young people who enter the criminal justice system.

Palvinder Kudhail

Director Early Help and Social Care

Children, Young People and Community Development (CYP CD)

4.0 Local Context: Brent Children and Young People

4.1 Children and Young People Profile (2024)

- 339,818 people live in Brent. It is the 5th largest Borough in London¹
- Brent is one of the most diverse local authority areas in the country with 65% of the total population consisting of people from Black, Asian and Minority Ethnic heritage groups².
- Brent’s child population aged 0-17 years (based on Census 2021) is 73,056 with 33,359 aged 10-17 years.
- Brent’s child population (0-17) represents 22% of the total Brent population.
- Brent’s population aged 10-17 represents 10% of the total Brent population.
- Brent’s child population (0-17) represents 4% of the 0-17 London population.
- Brent’s population aged 10-17 represents 4% of the 10-17 London population.

¹ ONS 2021 Census

² GLA Population Projections 2022, published 2016.

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4.2 GLA Population Projection for 2021:

Table 2. Brent Projected Population by age.

	Projected Population 2021	
	Brent	London
Aged 0-19	81,300	2,085,300
Aged 10-19	41,500	1,024,800
All Ages	339,818	8,799,800

4.3 Looked After Children in Brent

In January 2025, there were 289 Looked After Children (LAC) – eleven fewer than in January 2024 (300). Brent has a smaller LAC cohort than its statistical neighbours and less than the national average. In January 2025, Brent had a rate of 39.0 LAC per 10,000 children under 18-years.

4.4 The LAC / YJS Cohort

Within an overall YJS open caseload of 112 children and young people in April 2025 there were 17 LAC young people supervised by the YJS - compared to 10 LAC in May 2024 – the increase is the result of eight children being remanded in custody for two serious offences. Looked after Children are one of the most vulnerable groups in Brent with many children experiencing high levels of harm and exploitation. Analysis of this cohort shows:

- 94% were male.
- 76% were aged 16 or 17 years.
- 41% were of Black African or Black Caribbean Heritage (60% in May 2024).
- 59% had committed a violent offence (70% in May 2024, 83% in June 2023, 72% in February 2022 and 37% in February 2021).
- 12% had committed a drugs offence (30% in May 2024, 17% in June 2023, 39% in February 2022 and 23% in February 2021).
- 26% had committed a robbery offence (10% in May 2024, 33% in June 2023, 39% in February 2022 and 9% in February 2021).

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4.5 Substance Misuse

National substance misuse treatment data shows that young people often enter specialist substance misuse services with a range of problems or vulnerabilities related to (or in addition to) their substance use. These include:

- using multiple substances
- having a mental health treatment need
- being a looked after child
- not being in education, employment or training (NEET)
- self-harming behaviour
- sexual exploitation
- offending
- domestic abuse

Analysis of 201 children and young people supported by Brent YJS between January and December 2024 found that:

- 174 children were male, 26 children were female.
- 84 children were from a Black Heritage Group, 48 were of 'Other' Heritage, 26 were from a White Heritage Group, 26 were of Mixed Heritage, 15 were from an Asian Heritage group and the heritage of 2 was Unknown
- Cannabis was the predominant substance - used or possessed by 52 (26%) children and young people supported by Brent YJS.
- 52 (25.8%) of those children had committed a drugs offence with 51 (98%) of the offence type being possession.
- 24 of the 46 children referred to the YJS due to cannabis crime were referred for substance misuse treatment. This is consistent with the national picture where cannabis is the most common substance used by children referred for treatment (52%).
- 67% had mental health concerns.
- 7% had a special educational need.
- 1% were recorded as having difficulty with speech and language.
- 16% had been or currently were in LA care
- 26% were previously or currently subject to a CIN.
- 8% were previously or currently subject to CP.

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4.6 All children and young people: April 2025 open caseload

A snapshot of the active caseload taken in April 2025. showed there were 112 open cases. Analysis of the caseload showed that:

- Sixty percent were aged 16 or 17 years compared to 67% in May 2024, 64% in June 2023, 64% in February 2022 and 57% in February 2021.
- Eighty-eight percent were male compared to 89% in May 2024, 87% in June 2023, 78% in February 2022 and 86% in February 2021.
- Thirty-eight percent of children and young people were from a Black Caribbean or other Black Heritage Group compared to 54% in May 2024, 46% in June 2023, 48% in February 2022 and 46% in February 2021.
- Twenty-three percent, inclusive of caretaking cases, were LAC.
- Twenty-three percent were NEET (in academic years 12 and 13 and including children and young people residing out of Brent) compared to 23% in May 2024, 29% in June 2023, 39% in February 22 and 24% in February 2021.
- Seven percent of the caseload (8) had an EHCP or Statement of SEN compared to 11% in May 2024, 6% in June 2023, 5% in February 2022 and 12% in February 2021. SEND / Additional Learning Needs is one the ten newly introduced KPI's monitored by the YJB.

The wards containing the highest proportion of children in the April 2025 cohort were Alperton, Mapesbury, Stonebridge and Harlesden. Children and young people residing in these wards represent over 28% of all open cases. A significant proportion (almost a quarter) reside outside of Brent.

4.7 Brent YJS 2024 case level data:

Table 3: Brent YJS Case Level Data 2024

Brent YJS 2023/24 Case-level data (Offences and Offending Populations)			
Offences	Disposals	Offending population by ethnicity	Offending population by gender

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Total Offences	No. of Pre -court disposals	No. of First -tier disposals	No. of Community disposals	No. of Custody disposals	Total Disposals	White	Mixed	Asian	Black	Chinese or Other	Unknown	Female	Male	Unknown	
210	22	73	18	2	116	12 (12.5%)	13 (13.5%)	3 (3.2%)	41 (42.7%)	26 (27.1%)	1 (1.0%)	6 (6.25%)	90 (93.75%)	0 (0.0%)	96

4.8 Reducing caseloads and increasing complexity

The significant reduction in caseloads in recent years reflects changes to national sentencing policy which is largely now focussed on more serious offences and children who are most at risk to others. This has led to smaller, more complex cohorts of children who often present with multiple vulnerabilities and are at high risk of harm to themselves and others. In recent years, the proportion of young people assessed as posing a high or very high risk has increased - especially amongst 16 to 18-year-olds. Inspection data taken from the *HMIP Annual Report March 2022*, showed that 'nearly 80 per cent of children sentenced to a court order were assessed as presenting some form of concern to others, and 30 per cent were considered to present a high or very high risk of harm'.

In Brent, the most prolific types of youth crime are offences of violence against the person, drug possession and supply, robbery, and motoring offences. Serious youth violence (often with links to gangs, drugs and county lines) is a persistent problem - along with knife crime - and has increased the amount of statutory provision children and young people receive.

5.0 Child First

5.1 Brent YJS delivers services to children and young people in accordance with *Child First principles*

Brent recognises that being Child First requires services to prioritise the best interests of children and recognise their needs, capacities, rights, and potential. For this reason, Brent supported Crest Advisory, an independent crime and justice consultancy, as part of ongoing research, commissioned by the YJB to understand the implementation of Child First in

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the youth justice system. This involved a series of staff interviews, and an in-person workshop that offered practitioners the opportunity to help shape the support that youth justice services receive from the YJB to operationalise Child First effectively. Key themes included, perceptions and practical applications of Child First, collaboration across youth justice services and partner organisations, and the YJB's role in driving the implementation of Child First.

The importance of really understanding our children and young people has become a key theme for Brent. All work is child focused and recognises structural barriers to full participation. This is reflected in the CYP training offer which includes anti-racist, and cultural competency training. Furthermore, YJS practice development sessions are delivered regularly and frequently make use of YJB effective practice resources to enhance the skill with which practitioners consider the importance of structural inequalities, racial discrimination, and the impact of trauma. YJS assessments are commenced after a young person, and their parent / carer's self-assessments have been completed.

Recognising neurodivergent characteristics is a fundamental part of being Child First because the way people think, move, act, see, hear, and process information varies from person to person which means some people do things differently from others. The term 'neurodiversity' covers many different conditions including attention deficit hyperactivity disorder (ADHD), autism spectrum condition (ASC) also known as autism spectrum disorder (ASD), dyspraxia, dyslexia, and developmental language disorder (DLD). Historically conditions such as dyslexia, dyspraxia, ADHD and ASCs were viewed as separate disorders or conditions. More recent research has shown these should not be considered as binary diagnoses, in that you either 'have it or do not', but more like continuous traits such as height or blood pressure where everyone lies somewhere along a continuum. The impact of having one or more condition for the individual can vary substantially however:

- About one in six people are thought to be neurodivergent
- One in four in the unemployed population are thought to be neurodivergent
- At least one in three people moving through the justice system are thought to be neurodivergent - many will not have been diagnosed whilst at school.

By taking an inclusive approach to service delivery and design, Brent YJS is able to engage more children and young people in an accessible manner. Creating a formulation for each child means the YJS has moved away from labels, to being more child-centred and towards inclusive and not exclusive approaches. Brent YJS promotes a child's individual strengths and capacities to develop their pro-social identity for sustainable desistance, leading to safer communities and fewer victims. All work is constructive and future-focused, built on supportive relationships that empower children to fulfil their potential and make positive contributions to society. Brent's continued focus on trauma and Adverse Childhood Experiences (ACEs) in its work with children and young people assists practitioners to identify those at higher risk of

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harm. Specific work can then be identified where the young person has complex issues, is 'stuck' or where there is high anxiety within the professional network. Joint 'signs of safety' group supervision with social work colleagues helps YJS workers to understand concerns and the importance of the joint planning process.

Brent YJS recognises the importance of Speech & Language and Communication Needs (SLCN) in our work with children. SLCN is described as difficulty understanding or using language. It is a type of neurodiversity, which can only be diagnosed by a Speech and Language Therapist. SLCN can also be deemed to be a hidden disability. The Brent Youth Justice Board, led by our NHS and Inclusion Service representatives, is currently redoubling efforts to establish referral pathways that will enable Brent children and young people known to YJS to access Speech and Language Therapy.

5.2 Encouraging children's active participation, engagement, and wider social inclusion

The Brent CYPCD Participation strategy describes how young people and children have meaningful and inclusive involvement throughout the decision-making process for services that impact them. It provides a structured approach to creating an environment that enables children, young people, and their families to have active involvement which influences decision making, policy and service development. Overall, participation offers numerous benefits for young people, giving them a voice and platform to be actively heard, fostering personal growth promoting social connections and enabling them to have a meaningful impact on their own lives and the wider community.

Adopting this approach has strengthened YJS's ability to form meaningful and creative collaborations. Children supported by the YJS Participation Officer have developed short films about their aspirations, challenges and experiences as victims and perpetrators of crime. Closer links with the Raheem Sterling Foundation are being formed and this has led to a group of five children, who supported a knife amnesty, discussing their hopes and aspirations with Raheem Sterling for over an hour. 'Roundtable' discussions with the Police and young people commenced in 2024. These afford children from the YJS the opportunity to share their views on crime and exploitation with the Police and senior decision makers.

During 2024/25 YJS children from Black Heritage groups identified the need for music and creative activities to form a greater part of the YJS offer. As a result of this, children from YJS have been supported to access an extensive range of music, sport and creative activities at Family Well-being Centres. All programmes have been designed to respond more specifically to children's needs and provide an open space for self-awareness. This work will be extended over the next

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three-years in line with the priorities contained in Brent's recently launched Youth Strategy 2025-2028 which are: Being Heard and Taking Part, Reaching Goals and Enjoying Yourself, Feeling Good and Staying Safe.

5.3 Promoting a childhood removed from the justice system through prevention, diversion, and minimal intervention

Possession of cannabis represents approximately 70% of all First Time Entrants to the youth justice system. Since August 2021, Brent children and young people arrested for the possession of cannabis have received Community Resolutions. These are non-criminal disposals that function as an alternative to entering the youth justice System. Despite the voluntary nature of Community Resolutions, children who receive them are offered a level of support that is commensurate to other OOCs. This includes assessment, and co-produced intervention and safety plans. Interventions offered to children include referrals to substance misuse counselling, Police led crime awareness sessions, and mental health screening and referral.

The work of the Brent Out of Court Disposal Joint Decision-Making Panel includes healthy debate on mitigating factors for children who have offended. The Panel adopts a child-first approach to identifying and balancing the personalised needs of the child against the wishes of the victim. Relevant professionals such as CAMHS workers, Social Workers, Substance Misuse Workers, Inclusion Service Officers, and Mentors are invited to Panel meetings to enable a holistic understanding of a child's background, neurodivergent characteristics, trauma concerns, learning needs or mental health issues. This enables the Panel to make child focused decisions that prevent children from being unnecessarily criminalised when they break the law. Children on an OOC who experience difficulties in school or have issues with their school place are referred to the Inclusion Service so their family can receive advice and specialist support. This includes managed moves, being home educated, and obtaining school places.

6.0 Voice of the Child

6.1 Brent YJS listens to children and young people

Brent listens closely to the voice of the child. It is heard through a range of activities that are designed and implemented by young people. This has enabled Brent YJS to move beyond hearing their views to ensuring young people are part of decision making, planning and implementation. We have journeyed with them to the implementation of a range youth led projects. These have been more creative and interactive approaches, supported by the YJS Participation Officer, such

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as podcasts and short films - including a short film about online exploitation that was shared with the Contextual Safeguarding Strategic Group.

Brent YJS commitment to co-production and youth participation was afforded a strategic advantage in April 2022, when the YJS Management Board approved a proposal to form the Youth and Youth Justice Service by bringing together the YJS and the Council's responsibility for coordinating and monitoring the Brent Youth Strategy. Approval was also given by the Board for Early Help to develop a small team to establish youth led activities at Family Wellbeing Centres. This has enabled YJS to promote service user access to a much wider range of youth participation opportunities than was previously possible. It has also created close alignment to a range of universal provision that had previously been difficult for many children from the YJS to access.

6.2 Over the course of the HMIP Inspection of youth justice services 2022/24, 423 text surveys were sent to children, parents and carers. HMIP received 152 complete responses and 52 partial responses (204 in total). Key findings included:

- Ninety-six per cent of children, parents and carers felt the aims of the YJS were communicated effectively to them: 'Help and guide', 'keep me/my child out of trouble', 'avoid further offending', 'to make better choices'.
- Ninety-eight per cent believed that their case managers had the right skills to help them: 'You get warm vibes with them – you feel that you can talk to them'. 'I feel confident with my worker, and I trust them'. 'It's taken some time to build the trust because it is something I struggle with. They got round it by being genuine, and being with them a long time now has helped me to really get to know them'.
- Ninety per cent felt that their YJS had supported them and helped them to get access to the services that would support them and help them to stay out of trouble: 'They pay for me to go to a music studio and use it for free. The people that work there have also helped me to learn how to produce music and beats.'
- Ninety-nine per cent of children felt that the places where YJS practitioners saw them were safe and accessible.
'They ask where you feel safe when you first meet them. I didn't feel safe where my school was and my YJS worker helped to get me into a new school placement.'

6.3 Brent Young People and Parent and Carer Surveys – 2024

During 2024 an extensive survey took place with YJS young people and their parents and carers. This involved 68 young people. Participants were given multiple choice questions, afforded the opportunity to provide explanatory information, and asked to rate responses on a scale to 10 - higher is better.

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Of the 68 young people, 38 (56%) were subject to a referral order and 8 (12%) were subject to a Youth Rehabilitation Order. There were 2 (3%) subject to a Detention and Training Order.

There were a wide range of responses to the question 'What led you to offend? This included frustration, anger, fear, stupidity, being bullied, not thinking, decision making both positive and negative, homelessness and money and a sense of justice. A few children maintained their innocence.

Other findings include:

- 94% (64) believe the case manager understands what has happened in their life.
- 96% (65) described their strengths as a person as sporting, nice person, resilient, good at DIY, sociable, fighting and music.
- 39% (22) fully understood their sentencing experience in court (10 rating - highest) and another 56% (32) gave ratings at 5 or above. 3 (5%) gave a rating of 1 (lowest).
- 96% (65) said they had their court order explained to them by the YJS officer.
- The overall court experience was viewed in varied ways by young people. This ranged from 'stressed, nervous, scared, trials are not fair', to 'it was ok, alright, calm, very good' and 'it was ok, but the fine was inconvenient'.
- 73% (19) said the YJS officer explained what the court order meant (42 young people skipped this question).
- 100% of young people said their case manager had completed work with them prior to an initial referral order panel. This included a learning questionnaire, YP assessment, mood questionnaire, screening tools, parent assessments, career choices, negative peers, and learning styles assessment.
- 97% (66) were offered an opportunity to engage in positive activities whilst in contact with the YJS.
- 100% felt listened to by their case manager.
- 99% (67) felt satisfied with the work that the case manager had completed with them.
- Key areas of work completed within the plan as indicated by the young people were peer pressure (54%), substance misuse (59%), victim awareness (63%), ETE (46%), work on my offence (62%), my identity (46%), reparation (41%), work on my safety (41%), restorative justice (21%), family support (28%) ETE work with Prospects (22%), stop and search (knowing your rights) (24%), weapons awareness (40%) and ETE work with PLIAS (16%).
- 94% (64) said that the case manager had given them feedback about their progress.
- When asked what has worked well or made the biggest difference on your order, responses included 'Obtaining a passport, kept me busy, knowing right and wrong, understand things more, anything can be a weapon,

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appointments give me a routine, cast off some friends, how to think and behave, good substance misuse sessions, helped my self-esteem and mental health, engaging with ETE, advice to keep me out of trouble, I like talking to you, session on decision making, having help from different people, substance misuse and mental health assessment'. One respondent stated: 'I am not the person I was 2 years ago and that is a good thing.'

- 100% said that their case manager has encouraged them to think about their future plans.
- 99% (67) said that the case manager contacted them on the date and time expected for their session each week.
- 69% (47) said that their case manager had visited them at home.
- 78% (53) of them had said that the case manager had supported them to keep them safe. This was due to 'safety mapping, advice to not go into certain areas, not going missing and telling staff where I am, advising me to talk to my Mum about the threats and better friends.'
- 34% (23) have been a victim.
- 81% (55) had been stopped and searched.
- 61% (41) felt well supported by their case manager (a 10 rating) and a further 26% (18) rated this support as 8 rating or 9.
- Participants expanded on how support' could be improved with a range of responses including: 'less (face to face) appointments and more appointments over the phone, sometimes when I am talking she does not take it all in and could listen some more, continuous support, not being so reluctant to give second chances, getting to know my case manager better, not making me do victim awareness or reparation, to be more understanding of why I did what I did, moving quicker on stuff that needs to get done.'
- 78% (53) felt that the YJS helped them to stop re-offending
- When asked what the biggest barriers to moving forwards in their lives were, participants replied: 'the neighbourhood, wrong friends, my ADHD, I don't want to answer this, some people in Southend can be a negative influence, mistakes in life, criminal record, need a job or training opportunity, to think about what I'm doing before I do it, Social Care do not listen and are too much in my business, being in custody and then needing to make up for lost time, stopping smoking cannabis, working, alcohol and my anxiety with people, nothing, being disciplined, being tagged, and living in Wembley'.
- When asked how the YJS could improve its service to young people, participants replied: 'have people work with us that have gone through the same experiences with committing a crime, don't assume people are in gangs or talk about safety issues when it's not the case, less appointments, no panels, book me a music studio session every Saturday, more videos and presentations with the interventions, more activities and practical work, not coming to court as it makes me feel like a bad person, having a jobs board for local opportunities - the SPEAR program does this but most of the opportunities are not in my area, doing what you say you will do quicker, Nah I

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don't think so, continue supporting them, more free activities like free gym memberships, have more Panels like Roundtable for young people to have good discussions about different things that affect them, not have so many appointments, more straight to the point, by providing constructive use of time such as studio time, or sports activities.'

Although findings were positive overall, there several areas where improvements need to be made. These include:

- Whilst YJS Case Managers invest a great deal of time explaining court proceedings, it is worrying that a large proportion did not fully understand their sentencing experience at court, and equally that some children were stressed, nervous and scared by their overall court experience. YJS will review current approaches to preparing children for court to identify the strengths and weaknesses of our current approach. Recognising the likely impact of known and undiagnosed speech and language difficulties and progressing our work with the NHS and Inclusion Service to unlock pathways to SALT provision will be central to improving our understanding.
- Similarly, YJS Case Managers routinely explain what a court order is, its requirements and the consequences of non-compliance. It is therefore concerning that 42 young people did not respond to this question. The YJS will assess the extent to which these messages are being delivered in a child friendly way that matches an individual's learning needs. Practice development sessions and individual support will be provided to officers where necessary. The extent to which speech and language difficulties may have contributed to the low response rate must also be considered as part of wider work to access SALT provision for children known to YJS.
- Thirty-one percent of children said they didn't receive a home visit. Work is needed to understand why. Whilst there are often safety reasons for not doing so, analysis of the ChildView database will be undertaken to understand why home visits were not undertaken in all instances. Team Managers will be expected to have close oversight of this area of practice, and where necessary provide rationale for not doing so in supervision.

6.4 YJS Parents and Carers Survey - 2024

Twenty-nine parents took part in the YJS Parents and Carers Survey 2024. Seventy-six percent of participants were female. Fifty-two percent of their children were sentenced at court and the remainder received an Out of Court Disposal (OCD) from the Police.

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Parents overwhelmingly felt emotional strain because of their child's involvement in the youth justice system. Participants referred to: 'sadness, upset, shame, tearful, feeling bad, and anxiety'.

Other findings include:

- 42% of parents found accompanying their child to court to be a difficult experience. Seventeen percent (5) said they had a good experience at court.
- 100% of parents attended and participated in their child's initial YJS meeting.
- 97% of parents felt listened to and included in the preparation of their child's Intervention Plan.
- 93% of parents were sent a copy of the plan of work to be undertaken.
- 51% of parents were invited to the child's quarterly review meeting.
- 97% felt they were able to speak to their child's case manager about any issues or concerns.
- 100% reported that they received up to date reports from the child's case manager about what is happening.
- Over 90% rated their experience as 8 and above when asked if their child was fully supported by the YJS.
- 93% were offered support, advice, and information about parenting.
- The support parents received was regarded positively: 'I could air my concerns, excellent advice and support, given a lot of tools to keep calm, supported and encouraged throughout, really helpful, I followed the advice and its worked'.
- 93% of parents and carers were satisfied with the service received from the YJS (43%) or very satisfied (50%).
- The top five issues of concerns identified by parents and carers were: substance misuse:19 parents (65%), child criminal exploitation:18 parents (63%), gangs: 20 parents (69%), social media: 14 parents (48%) and County lines: 12 parents (41%).

6.5 Although findings were positive overall, there several opportunities for improvements to be made. These include:

- It is unsurprising that so many parents and carers experienced emotional difficulties as a result of their child's involvement in the youth justice system. However, given that 100% had attended their child's initial YJS meeting, and so too that they were happy with the support provided by case managers, it is notable that so many found court to be a difficult experience. This may suggest that they require more emotional assistance than a Case Manager can be expected to give. Either way, YJS staff will work with parents to identify any additional needs that could be provided by the YJS and to refer them to local support including that offered at Family Wellbeing Centres.

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- Case Managers will invite all parents and carers to their child's quarterly review meeting. Team Managers will provide close oversight of this work and ensure the reasons for all instances of absence are recorded on ChildView.
- Parents and carers will be given access to structured workshops covering the issues they are most concerned about.

6.6 Raheem Sterling Foundation

In collaboration with Raheem Sterling Foundation and Word 4 Weapons, seven new Knife Amnesty bins were unveiled in Brent at an event held in May 2024, attended by five young people from Brent YJS, council and community workers. The knife amnesty bins provide an anonymous way for knives to be safely disposed of, with the addition of a QR code signposting young people away from knife crime and towards support with mentoring, education, and work opportunities. The bins align with the Raheem Sterling Foundation's Power of 7 objectives: social mobility, employment, education, community, creativity, leadership, and enterprise.

Commenting on the partnership, Raheem Sterling said, "I want this project to make a real difference to young people in Brent by guiding them to take positive actions and have better access to a powerful support network of opportunities. Growing up in Brent, I understand the challenges that young people experience every day, I truly hope our work enables change and I'm grateful to all our partners and the organisations supporting us to help improve the lives and increase opportunities for young people."

The YJS Participation Worker, together with YBF and the Raheem Sterling Foundation, organised for the five YJS young people who supported the event to travel to the Foundation's headquarters to discuss crime and community safety with the footballer Raheem Sterling. They spent a couple of hours being mentored, sharing their views on the challenges young people face, and hearing inspirational stories.

6.7 Brent Youth Parliament (BYP)

Brent Youth Parliament (BYP) represents over 77,000 children and young people living in the borough and encourages them to express their views and have a say on decisions that affect them. The parliament is open to young people aged between 10 and 19 (and up to twenty-five for young people with special education needs or disabilities) from a range of backgrounds, who represent schools, youth groups and different communities in Brent.

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Brent Youth Parliament run by an elected executive group of young people, which includes two members of the UK Youth Parliament who represent young people in Brent in national campaigns and decision-making. BYP meets at Brent Civic Centre once a month to discuss and campaign on issues that affect young people.

6.8 The Brent Youth Zone

This website promotes Brent Youth Parliament, the Fire Cadets and provides a platform for Brent young people to access universal information about employment, learning, support and advice and activities to get involved with. The Brent Youth Zone website is also used as an engagement tool for young people by providing online access to youth surveys to gather the voice and views of young people.

6.9 Junior Care in Action (Junior CIA), Care in Action (CIA) and Care Leavers in Action (CLIA)

The Children in Care Council for Brent Council works to make sure children and young people in care and care leavers have the chance to be involved in making decisions and in sharing views about the services and support received. These groups use flyers, newsletters and arrange meetings to share information and experiences.

6.10 Christmas Tree Appeal

In December 2023, Brent Early Help worked with the MET Police as part of their Xmas Tree appeal, reaching 3,000 young people in Brent CYP (including all YJS children) and across the borough in Family Wellbeing Centres. The aim of the work was to ensure that as many young people as possible received an age-appropriate book (for 0–12-year-olds) or a £10 online shop voucher for 13+ year olds, as well as toys, games and learning resources. This was a large undertaking involving logistics and planning and was a great success. Planning was expected to begin again in October 2024; however, the MET Police were unable to undertake the Christmas Tree appeal and distribute donations in the same as they were focussing on raising funds instead.

After exploring alternative avenues, Brent CYP received a delivery of £535 worth of £15 Amazon vouchers and £10-£20 Love2Shop vouchers donated by 'Wates Living Space'. These were distributed to young people across the Looked After and Leaving Care team, 0-25 Disabled Children and Young People's Service, Accelerated Support Team, Family Solutions, Youth Justice Service and Family Wellbeing Centres. The Church of Annunciation in Wembley kindly provided a large range of children's toys, clothes, games, books and craft items, which were given out over the two CYP conference days to Early Help staff for their Brent children and young people for Christmas. We also received two sacks of children's toys from the Ace Café in Stonebridge, which were given to the St. Raphael's and Three Trees Family Wellbeing Centres. Planning for Christmas 2025 will begin in October.

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7.0 Governance, Leadership and Partnership Arrangements

7.1 The Brent Youth Justice Service (YJS) is a multidisciplinary, multiagency service that works with children and young people aged 10-17 years and their families. Brent YJS provides support in relation to diversion, prevention, out of court disposals, court work, bail and remand, the assessment of children and young people who offend, the provision of court reports, the planning and delivery of community interventions, indirect and direct work with victims, and custody and resettlement.

The YJS sits within the CWYCD Department and is managed by the Head of Early Help. The Director of Early Help and Social Care chairs the YJS Management Board. The Board provides strategic direction and support for the YJS, ensuring that planning is undertaken to deliver effective youth justice services - which aim to reduce offending and safeguard children and young people. Secondly, the Board are informed by an understanding of the characteristics of the YJS cohort and the type and level of risk to children and young people and ensure proportionality in disposals for all children and young people in Brent.

7.2 The YJS Management Board has representation across the partnership at senior levels and has maintained a stable and engaged membership with awareness and knowledge of children in the youth justice system. Board members have developed an effective teamwork approach and contribute service area responses to Inspectorate recommendations, wider planning, and challenges. This consistent approach is embedded operationally reflecting the partnership's strategic focus on addressing disparity and disproportionality. All Board members have been encouraged to observe practice. A case study is presented by a member of the YJS at each Management Board meeting, promoting a wider understanding of interventions and their impact.

7.3 A review of the YJS Management Board's Terms of Reference, in adherence to YJB guidance, was approved in January 2025. The Board continues to monitor the original four KPIs reported to the YJB as well as overseeing the introduction and performance of ten new KPIs. The KPI on Management Board Attendance was met in full in 2023/24. The attendance at the Board remained good overall throughout 2024/25, however probation and educational representation dipped in the first half of the year due to new appointments.

Table 4: YJS Management Board Attendance 2024/25 by Quarter

Brent YJS Management Board Attendance 2024/25
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Senior Management Board Attendance	2024-25 Quarter 1 18/04/24	2024-25 Quarter 2 25/07/24	2024-25 Quarter 3 24/10/24	2024-25 Quarter 4 30/01/25
Health	0	1	2	2
LA Children's Social Care	0	2	1	2
LA Education	0	0	0	1
Police	2	2	2	1
Probation	0	0	1	1
Total	2	5	6	7

7.4 Families First reform programme

The Early Help and Social Care service commenced a redesign programme in April 2024, to make provision more seamless, holistic, and future fit. Involving staff at all levels and all stages has been a critical part of the programme's success. A series of workshops with Service Managers, Team Managers and practitioners across the service were conducted to gather a wide range of views and ideas. Other Local Authorities were also engaged, including those involved in the Government's Families First for Children Pathfinder, to understand best practice elsewhere. From this a set of key design principles underpinning the development of any model options were adopted:

- Ensure that Children and Young People are at the centre of everything we do.
- Reduction in silo-working between departments.
- Minimising and streamlining handover points between teams.
- Minimise assessments and duplication for children and families.
- Create greater opportunities for shared learning and experience building between teams
- Greater consistency for children and families.
- Increase practitioners' capacity to build strong relationships with children and families.
- Supporting the recruitment and retention of Key Workers and Social Workers.
- Improving the experience of Children and Families engaging with the Early Help and Social Care services.

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Using these guiding principles, three model options were developed, two of which were taken forward for extensive staff engagement in November and December 2024. Well over 200 staff participated in these sessions, providing extensive feedback on model options and guiding the choice of a preferred model. After careful consideration, OCSLT approved a proposed Target Operating Model for formal consultation with staff in January 2025. The model features a joining together of non-statutory Family Support Workers with Children's Social Workers in seven teams aligned to Family Wellbeing Centres. Each team is responsible for overseeing Family Support and Child in Need work. Additionally, Social Workers will be allocated to new Child Protection Teams and Court Teams to manage child protection and care proceedings cases. Care Planning Teams will remain the same, with the only change being that cases will only transfer to these teams once a Care Order is issued. Ultimately, it is hoped that this new model, with a stronger focus on preventative family support work, and closer working between qualified and alternatively qualified practitioners will reduce the number of handovers between different teams and ultimately improve outcomes for children and families.

7.5 Brent Youth Strategy 2025-2028

In March 2025 the refreshed Brent Youth Strategy 2025 – 2028 was approved by Cabinet after a period of consultation with partners and young people in Brent.

The refreshed youth strategy and action plan represent our promise and commitment to the young people of Brent, to deliver and achieve together. The Brent Youth Strategy document is made with and for the children and young people of Brent and outlines clearly how the Council and partners will work for them and support them towards a positive future. This will be monitored through the work of the Youth Strategy Delivery Group, that works collaboratively with multi-agency partners. Young people in Brent have been consulted throughout the process so that their voices and views on what is most important to them are heard and clearly reflected. The Brent Youth Strategy 2025 – 2028 is grounded in principles of equity, inclusion and innovation with a focus on ensuring that every young person, regardless of background, has the resources, confidence and opportunity to lead a healthy, fulfilling and purpose-driven life.

Through collaborative partnerships, the aim is to create a sustainable framework that nurtures the young people of Brent to be equipped to thrive.

Together with our partners, including the voluntary and community sector across Brent, we will continue building close and lasting relationships that will enable us to effectively succeed in the delivery of our strategy plan. We celebrate Brent for the diverse and vibrant borough that we are, and we are dedicated to ensuring the best possible

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outcomes for our young people. This refreshed youth strategy and action plan represent our promise and commitment to young people to deliver and achieve together.

The Youth Strategy's Priorities, or main themes, as identified by young people, are:

- Being Heard and Taking Part (Engagement and Participation)
- Reaching Goals and Enjoying Yourself (Skills, Opportunities and Activities)
- Feeling Good (Health and Wellbeing)
- Staying Safe (Safety)

On 7 April 2025, young people gathered at St Raphael's Family Wellbeing Centre to celebrate the launch of the Brent Youth Strategy 2025 – 2028 with stalls promoting youth provision and support across Brent, free sporting, music and gaming activities, hot lunch and snacks provided and a sponsored raffle.

Members of Brent Youth Parliament, who played a key role in shaping the strategy, declared: "This is a strategy made for young people, by young people, with our fingerprints embedded firmly in it."

Brent Council is strongly committed to supporting the local youth sector with the principles in the Brent Youth Strategy. These include supporting a programme of refurbishment of existing voluntary sector youth facilities as well as converting spaces such as empty buildings or offices into modern accommodation that the voluntary sector could use for the benefit of young people across the borough. These developments - through the Strategic Community Infrastructure Levy (SCIL) Youth Provision Project – will see up to £2.15 million spent on physical infrastructure to improve youth provision in growth areas. The youth voluntary sector will be able to apply for funding to improve or upscale their buildings to deliver social infrastructure and to improve the quality of life for children and young people in Brent in line with the Brent Borough Plan 2023-2027.

- 7.6** The YJB's revised Key Performance Indicators (KPIs) for Youth Offending Teams (YOTs) were introduced in England from April 2023 and approved by the YJS Management Board in January 2023. This stated that the existing four current KPIs: binary reoffending rate, frequency of reoffending, first time entrants and use of custody, will continue to be used in conjunction with ten new KPIs. These are accommodation, education, training and employment, SEND/additional learning needs, mental health and emotional wellbeing, substance misuse, out of court disposals, management board attendance, wider services, serious youth violence, and victims.

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7.7 Brent YJS is aligned to the Youth Justice Board oversight framework. This framework, informed by the YJB's vision (April 2023), monitors youth justice system performance, oversight, assurance, and compliance. It additionally highlights the YJB's two specific monitoring functions: operation of the youth justice system and the provision of youth justice services and the extent to which the system aims are being achieved and any such standards met. The framework has provided clarity on how the YJB's monitoring function is fulfilled, outlining how oversight of local youth justice services is undertaken and delivery across the wider system is understood. The framework – consolidated through the YJB Strategic Plan 2024-27 - is a new way of working for the YJB which involves challenge and support and helping systems and practices to be embedded. Our continued good relations with the YJB, who attend our Board meetings and regularly meet with the Youth and Youth Justice Manager, will continue to have far reaching benefits for our children, families, and wider communities.

7.8 The Brent Borough Plan 2023-2027, sets out what the council will focus on over the next four years. The Plan is called 'Moving Brent Forward Together' and it focuses on five priority areas:

- Prosperity and Stability in Brent
- A Cleaner, Greener Future
- Thriving Communities
- The Best Start in Life
- A Healthier Brent

By focussing on keeping young people safe, raising aspirations, empowering young people and encouraging them to be seen and heard, the work of Brent YJS is closely aligned to the Best Start in Life theme.

8.0 Workforce development

8.1 In line with the YJB Business Plan 2023/24, Brent YJS has a diverse workforce that reflects the communities it serves. Brent YJS shared its staffing profile by ethnicity with the Youth Justice Board in September 2024. This showed it is diverse and representative of children in the Brent Youth Justice System. Brent has a Disproportionality Action Plan which it regularly monitors - via the YJS management Board - and continues to ensure that everyone who works for the YJS has planned and recorded individual training and development.

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- 8.2** Brent YJS benefits from partner staffing contributions equivalent to 7.6 FTE within the YJS and senior members from partnership agencies at Board level. The YJS is compliant with the minimum staffing requirement set out in the Crime and Disorder Act 1998 – with multi agency staff from Education, Health, Probation, and the Police.
- 8.3** Brent Police continue to provide a continuous staffing contribution that exceeds the minimum statutory requirement of 1.0 FTE. There are 2.0 FTE Police Officers.
- 8.4** There are two mental health practitioners within the YJS, a seconded CAMHS practitioner and a NHSE funded Youth Justice and Liaison and Diversion Worker who undertakes mental health screening. Both offer children and young people 1:1 session, develop staff knowledge around emotional wellbeing, and support the wider professional network.
- 8.5** A 0.6 FTE National Probation Service officer is seconded to YJS. The officer holds a case load, advises YJS officers about transitions to the adult estate, and makes positive contributions to wider YJS work including team meeting attendance and providing duty cover.
- 8.6** Since the formation of YOTs in 2001, Education has fulfilled their statutory requirement to support YJS via annual Direct Schools Grant financial contributions.
- 8.7** Reporting to the Head of Service, Early Help, the Youth and Youth Justice Manager has overall management oversight of 21.5 FTE staff members.
- 8.8** Brent YJS has maintained a stable workforce of permanently employed staff. All staff have accessed training through the Brent Council CYP training programme and INSET training recommended by the Youth Justice Board. The team have received more specialist training this year such as, Restorative Justice Practice, Youth Justice Legal Training, Cultural Competency Training, anti-racist training, and neurodiversity. Regular monthly YJS monthly practice development sessions during 2024/25 have provided a wide and comprehensive focus upon case practice issues including restorative justice, understanding the new YJB KPIs, assessment and planning, Referral Order Panel best practice, reviews, management oversight, and reflective supervision.
- 8.9** The YJS will continue to develop its practice in line with the neurodiverse and personalised needs of children and young people during 2025/27. This will include building upon our understanding of disproportionality concerns, cultural competency and anti-racist training, especially around the journey of the child.

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8.10 YJS Case Managers have access to a range of one to one and group work interventions which cover a range of themes. These include offending behaviour, risk and safety interventions, victim awareness, decision and problem solving, anger and emotional management, and weapon and knives interventions.

9.0 Resourcing and Services

9.1 The YJS benefits from well-established partnerships with agencies within the voluntary sector including:

9.2 VIA

Since 2017, VIA, a voluntary sector provider that specialises in substance misuse provision have been supporting YJS children and young people:

- Who have admitted to, or been found guilty of, the commissioning of drug offences by a court of law.
- Or have been assessed as having substance misuse needs as part of the YJS duty to supervise court ordered sentences. This crucial support has been made possible due to Brent Public Health commissioning arrangements.

Following a remapping of substance misuse pathways exercise led by Public Health, VIA have increased their support in April 2025 to all children in the Brent youth justice system. This has been achieved by extending the referral pathway to include children who have received a Police-issued OOC for drug related offences, or are assessed by the YJS to have, or be at risk of, substance misuse harm.

Substance Misuse is one the ten newly introduced KPI's monitored by the YJB.

9.3 I Am Brent

I Am Brent is a local consortium includes Step Up Hub (lead organisation), PLIAS, Sport at the Heart, Connect Stars, United Borders and Hilltop. These organisations work together to address the root causes and effects of violence affecting young people in the London Borough of Brent. Support includes pre-custodial release engagement, intensive trauma informed mentoring, one to one casework support, employability support, psychotherapy, and family support. Under YJS management, TPH will work with I Am Brent to maximise the effectiveness of referral routes across CYPCD and identify opportunities to work more collaboratively.

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9.4 Brent Centre for Young People (BCYP)

BCYP offers a range of psychotherapeutic mental health interventions, designed specifically for children and young people who offend and who often struggle to engage with mental health services.

9.5 St. Giles Trust

St. Giles offer gang affected mentoring for children and young people involved in or at risk of criminal exploitation. Provision is accessible via the Exploitation, Violence and Vulnerability Panel.

9.6 Young Brent Foundation (YBF)

YBF are an umbrella organisation for local voluntary organisations and community groups. They provide mentors from across member organisations to match young people with mentors best suited to support them. The work, support, and guidance they provide to YJS is informed and guided by their extensive community knowledge. YBF is the primary link between YJS and the local youth sector. Community information is routinely shared with YJS staff and at a strategic level through membership of the YJS Management Board.

9.7 Multi-agency Panels

Brent YJS leads or contributes to a wide range of multi-agency Panels with specific strategic and operational functions. These include:

Resettlement and Aftercare panel

This monthly panel discusses all children in custody and ensures the accommodation and wider needs of children and young people due to be released from custody are identified and planned for in a timely and transparent fashion in line with the YJB's principles around constructive resettlement. The Panel also provides senior oversight on bail and remand work. Regular panel members include Feltham YOI, the Police, Social Care, Early Help, the NHS, CAMHS, Restorative Justice Workers, and the CYP Placement Service.

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Strategy and Professionals meetings

These meetings are convened as and whenever necessary to share risk, court outcomes, and other information needed to keep children and young people in the criminal justice system safe. Members include YJS, Social Care, Police, Health, and Education.

Exploitation, Violence and Vulnerability Panel

This Panel co-ordinates the sharing of information between partners about children and young people at risk of sexual or criminal exploitation, trafficking and modern slavery, and missing children to ensure identified risks are appropriately managed.

YJS Risk, Safety and Wellbeing Multi-agency Management Risk Forum

This YJS led multiagency forum meets monthly. It provides senior management oversight of risk and safety and wellbeing for some of the most vulnerable children and young people in Brent. Attendance includes Social Care, Police, CAMHS, Probation, Inclusion Service and YJS staff.

Contextual Safeguarding and Violence Reduction Strategic Group

The purpose of the Brent Contextual Safeguarding and Violence Reduction Strategic Group (CSVRSRG) is to understand the profile of our most vulnerable and at-risk residents, oversee themes and trends and develop interventions to make individuals and Brent residents safer. The CSVRSRG – which has a core membership of numerous agencies and other agencies as required - supports the Safer Brent Partnership to achieve the priorities of the Safer Brent Strategy to:

- Tackle violent crime
- Challenge domestic abuse sexual abuse and preventing violence against women and girls
- Focus on incidents impacting our community
- Protecting the most vulnerable

The Brent CSVRSRG is accountable to the Safer Brent Partnership and contributes to the Safeguarding Children Forum and Safeguarding Adult Board.

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YJS Risk, Safety and Wellbeing Multi-agency Management Risk Forum

This YJS led multiagency forum meets monthly. It provides senior management oversight of risk and safety and wellbeing for some of the most vulnerable children and young people in Brent. Attendance includes Social Care, Police, CAMHS, Probation, Inclusion Service and YJS staff.

YJS Transitions Panel

Chaired by YJS with attendance from Probation, Police (IOM) and Leaving Care colleagues, the Panel discusses young people transitioning from the YJS to Probation in accordance with the new local YJS and Probation Protocol – which is informed by the Joint National Protocol for transitions in England (June 2021). The purpose of the Panel is to support the planned and safe movement of young people from the youth justice service to the probation service when they turn 18.

Restorative Justice (RJ) Improvement Group

This is a group comprised of Referral Panel members, YJS, Police and the Courts. Members consider meaningful reparation opportunities within the community that are beneficial for both the community and young people. It is also a forum for discussion and reflection about RJ good practice. The Panel enables children and young people to consider different ways of repairing the harm caused by their offending, acquire the opportunity to reflect on their offence(s), and see the wider consequences of their offending for themselves and others.

NEET Working Group

The NEET Working Group consists of the YJS, the Virtual School, Prospects and PLIAS (mentoring). It provides a child-focused consideration of NEET young people on a case-by-case basis, inclusive of planning work and educational initiatives to help young people engage in education and training.

Out of Court Disposals (OCD) Decision Making Panel

This weekly Panel is chaired by YJS and attended by Police, Health, YJS, Social Care, Early Help staff and Restorative Justice workers to jointly consider and determine OCD decisions guided by the ACPO Police child matrix. It additionally identifies young people who are eligible to attend the Turnaround project.

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9.8 The Safer Brent Partnership (SBP)

Community Safety Partnerships are multi-agency, strategic groups that oversee the approach to reducing crime and antisocial behaviour in a particular area. SBP is made up of representatives from many agencies, including the London Borough of Brent, Metropolitan Police, London Fire Brigade, National Probation Service, Voluntary Services and Victim Support. SBP aims to build an involved community, with less fear of crime and greater confidence in services, which takes responsibility for its own actions. It also pledges to bring to justice those who cause the most harm to our community, using restorative approaches and out-of-court disposals where appropriate. Its work is intelligence-led and evidence-based, identifying real issues and taking a problem-solving approach to reducing them. The YJS Management Board is linked to SBP via its Chair who is also a member of SBP.

10.0 Progress on priorities in previous plan – new developments - and related performance against KPIs

10.1 Nationally: Youth Justice Board Strategic Plan 2024-27

Encouraging progress has been made over the last twelve years across the national youth justice system:

- The number of proven offences committed by children has fallen by approximately 65%. From 98,937 in 2012/13 to around 34,300 in 2022/23.
- There have been substantial falls in the number of children entering the justice system. This amounts to a reduction of around 77% between the years ending March 2012 and March 2023.
- There were approximately 11,900 occasions where children were sentenced at court in the year ending March 2023. This is 73% lower than in the year ending March 2012.
- The number of children being sentenced to custody has also shrunk. In the year ending March 2023, the average monthly population of the youth secure estate was the lowest it has ever been at around 440 children.

10.2 Brent

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In 2024/25, Brent YJS performed well in relation to reducing youth re-offending, the number of first-time entrants to the justice system and the use of youth custody. The statistical evidence is encouraging and set out in sections 10.3 to 10.5.

10.3 Reducing Reoffending

The binary rate of reoffending is the official measure of reoffending and the proportion of 'reoffenders' who make up the total cohort. Brent's overall trend appears to be that of a significantly fluctuating and decreasing reoffending rate. This is largely due to the small size of the cohort creating an effect of instability. Relatively small increases or decreases to the number of reoffenders, or the number of reoffences committed, can produce significant changes each quarter. For instance, in a quarter during which most reoffenders committed no or few offences, the rate of reoffending will increase considerably if one child is criminally prolific. This explains the large variations Brent has experienced during the last six years. In this time the binary reoffending rate was 50% in January to March 2017, 62.2% in January to March 2018, 32.6% in January to March 2019, 39.6% in January to March 2020, 14.9% in January to March 2021, and 13.9% in January to March 2022 and 26.1% in January to March 2023.

YJS has also created the YJS Transitions Panel to manage various transitions (often a vulnerable time for children and young people), listened to the voice of the child, responded to substance misuse and disproportionality issues, and conducted regular monthly quality assurance activity.

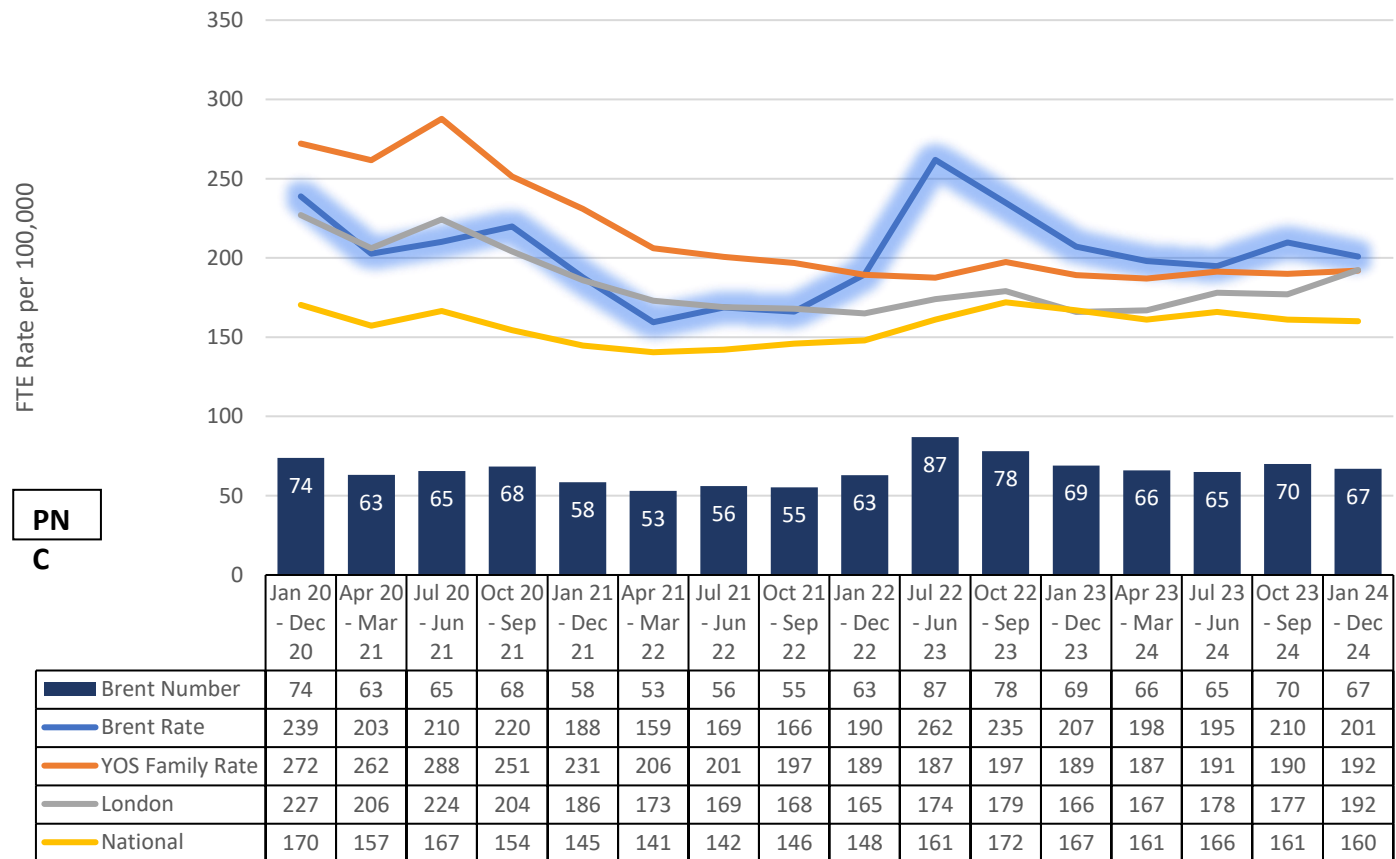
10.4 Reducing First Time Entrants (FTEs)

Although Brent recorded a small increase in the number of FTEs in 2024, the long-term trend is that of a significant fall. Brent's FTE rate per 100,000 children was 201 for the twelve-month period January 2024 to December 2024, compared to 207 per 100,000 children in the period January 2023 to December 2023. The data for this KPI comes from the Police National Computer and is shown in rolling full years.

The latest data published by the Ministry of Justice shows there were 67 new entrants to the youth justice system between January 2024 and December 2024. This is an annual decrease of 2 children when compared to the period between January 2023 and December 2023— 69 FTEs were recorded during this time.

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Table 5. No. of Brent Children Entering the Youth Justice System: January 2020 to December 2024.



10.5 Reducing Custody

Despite continued serious youth violence, criminal exploitation and gang affectedness, the number of Brent young people sentenced to custody has reduced from a high of 54 in 2013/14, to four in the twelve-month

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period ending January 2022 to December 2022. It decreased to three in the latest period (January 2024 to December 2024).

The number of remands in January 2024 to December 2024 (8 children) increased by three when compared to January 2022 to December 2022 (5 children). This increase is attributed to two serious incidents involving eight children. Children from BAME Heritage Groups continue to be overrepresented in the YJS remand cohort. The YJS has referred this to our children safeguarding partnership for a review given the themes that have emerged.

Table 6. Number of Children Remanded 2020 to 2024 by Heritage Group.

	Jan – Dec 2020 Remands	Jan – Dec 2021 Remands	Jan – Dec 2022 Remands	Jan – Dec 2023 Remands	Jan – Dec 2024 Remands
Black Heritage	8 (57%)	4 (50%)	1 (25%)	3 (60%)	6 (75%)
Other BAME	2 (14.5%)	3 (37.5%)	1 (25%)	0 (0%)	1 (12.5%)
Mixed BAME	2 (14.5%)	0 (0%)	1 (25%)	1 (20%)	1 (12.5%)
Asian BAME	1 (7%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)
Total BAME	13 (93%)	7 (87.5%)	3 (75%)	4 (80%)	8 (100%)
White Heritage	1 (7%)	1 (12.5%)	1 (25%)	1 (20%)	0 (0%)
Total	14	8	4	5	8

Brent YJS prepares written bail packages and bail letters whenever children are at risk of remand. Other proactive measures include management oversight and quality assurance of all bail applications, including a narrative of the child's history and lived experience in bail letters, and having a default approach that 'children will be given bail' in most instances. At Risk of Custody meetings are held regularly to help avoid the unnecessary use of custody.

10.6 Embedding Resettlement Practice

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The 2021 *HMIP Annual Inspection report of youth justice services*, highlighted resettlement as an area across YOTs that needed improvement. This was reinforced by the YJB in its 2023/24 Business Plan, later in February 2023 by the Minister for Prisons and Probation who directed 'YOTs to work 'with the Youth Custody Service to ensure every child has a clear plan ahead of their release and can access the right education, healthcare and accommodation support' and was highlighted in resettlement criteria for the HMIP Inspection regime. The Youth justice inspection Resettlement Case assessment guidance (CAG) v 1.3 June 2024 stated that 'planning for accommodation was to start at the point the child enters custody. This is a key aspect of resettlement work; other services cannot be organised until the child has an address to be released to'.

Brent continues to actively participate in the London Resettlement Partnership. Support is shaped by the five characteristics that have been identified as key to effective practice: Constructive, Co-created, Customised, Consistent and Co-ordinated. Support is shaped by the five characteristics that have been identified as key to effective practice: Constructive, Co-created, Customised, Consistent and Co-ordinated.

The Brent Resettlement and Aftercare Panel is an effective and well-structured forum for coordinating and reviewing resettlement planning with representation from key partners with an appropriate level of seniority. This is vital when considering that the YJB in its Strategic Plan 2024-27, described the patterns of violence, self-harm and trauma that is seen in custodial settings as 'unacceptable.' The Resettlement and Aftercare Panel will continue to review any safeguarding issues for children within the secure estate and ensure matters are escalated within the system. Systems are in place and adhered to in accordance with the Brent Probation and YJS joint protocol - under which all children are eligible for transition, and planning is initiated early.

10.7 Accommodation

Safe, suitable, and sustainable accommodation forms the foundations for delivering effective support to children and young people. In the period January to December 2024, 79 children and young people (76 in 2023) were supported by Brent YJS in suitable accommodation. Accommodation can however be deemed unsuitable for a range of reasons including proximity to contextual safeguarding risks, familial safeguarding risks, being placed in custody, or poor living circumstances such as overcrowding. In the same period, a further three children who resided in unsuitable accommodation were remanded into custody.

Brent YJS is working closely with Social Care to overcome barriers to unsuitable accommodation which include encouraging placement providers to accommodate children with challenging behaviour, and the practical difficulties associated with placing children in accommodation on weekends. Furthermore, Early Help offer a wide range of support

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that helps families address their housing and cost of living issues. Accommodation is one of the ten newly introduced KPI's monitored by the YJB.

Table 7. Suitability of accommodation 2024

KPI 1	Suitable accommodation	Unsuitable accommodation	% Suitable accommodation	% Unsuitable accommodation
Jan - Mar 2024	19	2	90%	10%
April - June 2024	24	1	96%	4%
July - Sep 2024	18	0	100%	0%
Oct - Dec 2024	21	0	100%	0%

10.8 Reducing disproportionality in custodial outcomes including remands and sentencing

Our work to reduce disproportionality follows the various stages within the criminal justice process and is particularly significant within the secure estate and the sentencing of young people. In 2023, a workshop with defence lawyers, CPS, and the court representatives on anti-racist legal representation (Just for Kids Law) provided important messaging regarding the role of defence lawyers to advocate for children and addressing the trust deficit within Black Heritage groups towards lawyers and Court Services.

During 2025-2028 there will continue to be a determined partnership response to some of the key recommendations in the *HMIP thematic inspection of work with children subject to remand in youth detention (November 2023)*, which found that at any given time, there are around 200 to 250 children remanded in youth detention. Further findings included:

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- a quarter of the children were released on bail before being sentenced, and inspectors judged that more of them could have been safely managed in the community.
- nearly half of the children in the cases reviewed had no previous convictions and some of the remands were long, lasting more than a year.
- in many cases children made no comment at the Police interview but this was not always to the child's benefit as admitting the offence at that stage might have made bail more likely.
- In just under three-quarters of cases the Youth Justice Service did not offer a bail programme at the child's first remand hearing.

Our responses will again be outlined in both the Youth Justice Improvement Plan 2025/26, and the Brent Disproportionality Action Plan to ensure there is a specific focus on a wide range of actions that address the needs of all children and young people. This will include actions addressing drug and alcohol support, monitoring release arrangements from the start of the sentence / remand, greater consultation on bail conditions, mandatory online training for Police officers around child trafficking, bail and remand training across CYP, early identification of accommodation options at the first court appearance, briefings to defence solicitors about the impact of 'no comment' interviews and offering voluntary support to those acquitted.

10.9 Reducing serious youth violence, exploitation and contextual safeguarding

Serious Youth Violence (SYV) is defined as any drug, robbery or violence against the person offence that has a gravity score of five or more. The Youth Justice Board SYV toolkit shows that serious youth violence in Brent decreased in the year ending December 2024 compared with the previous year. The tool also indicated that robbery offences have increased significantly in the year ending December 2024 compared to the previous year. An over representation of children from Black Heritage groups involvement in SYV persists. 41% of children and young people who committed SYV offences in Brent were from other heritage groups in 2024. This is an increase of 29% when compared to 2023 (12%), 2022 (0%) and 2021 (23%). Males make up the biggest proportion of children and young people committing SYV offences. In the year ending December 2024, 95% of the cohort were male compared to 100% in 2023, 96% in 2022 and 82% in 2021. During the first 3 quarters of the 24/25 period there were 2 drug related offences: 16 robbery offences and 4 offences of violence against the person.

Working in partnership is key to reducing SYV in Brent. Along with Social Care colleagues and youth justice workers from Barnet and Harrow, Brent YJS attends daily SYV Police briefings from the North-West London Borough Command Unit. Daily briefings function as an intelligence sharing forum and allow partners to coordinate the management of violence and tensions within Brent. Other strands to the concerted and joined up effort across the

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partnership to reduce SYV include supporting events such as Carnival, the deployment of various outreach activities in response to local needs, utilising peer mapping, summer programmes and communicating with neighbouring boroughs and courts. The YJS also employs safety mapping to identify risks and keep children safe.

Our work in this area will be guided by the recent HMIP report: *Multi-agency responses to serious youth violence: working together to support and protect children (Nov 24)*.

Key Points from Executive Summary

- The extent and impact of serious youth violence are more far-reaching than many adults realise
- A failure to consistently identify serious youth violence as a safeguarding issue is leaving too many children at serious risk of harm.
- The government and local agencies must prioritise the needs of children who are disproportionately at risk of harm from serious youth violence
- Multi-agency work was most effective when serious youth violence was a strategic priority
- In some areas, partners worked together well to meet the wider needs of children affected by serious youth violence.
- Local partnerships need to do more to evaluate approaches to addressing serious youth violence, to use available research about what works and to share learning across areas to drive improvement in practice.
- Children's access to support to address serious youth violence varies too much between local areas.
- Projects aimed at preventing serious youth violence often receive short-term funding.
- Engagement with the community, children and parents is essential

10.10 Reducing Knife Crime

Knife crime remains a persistent problem in Brent. A total of 39 knife offences were committed by young people in 2024, compared to 30 in 2023, 46 in 2022, 52 in 2021 and 44 in 2020.

Brent YJS has worked hard to reduce knife crime. Among other things, YJS staff accompany children to the monthly 'No Knives Better Lives' knife crime intervention at the Central Criminal Court ('Old Bailey'), all young people arrested for knife-related offences are required to attend a mandatory groupwork session led by professionals and members of the public who provide differing perspectives on knife crime – presenters have included a trauma surgeon, an ex-gang member, and the parent of a teenage victim of knife crime. Children who have committed knife offences are

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also referred to the Brent YJS Weapons Awareness Programme. This is an eight-week programme delivered by YJS Case Managers about the dangers of knife crime and offers participants strategies for preventing or resolving conflict without violence. The Raheem Sterling Foundation knife bin amnesty, saw a total of 118 weapons, including 9 zombie knives collected in September 2025. The March 2025 collection saw a total of 196 weapons, including 13 zombie knives and 4 other dangerous articles surrendered.

10.11 Unlocking Your Potential

Unlocking Your Potential seeks to inspire young people with entrepreneurial skills to achieve their ambitions. During the session with George the Poet George explained to the young people the key ingredient for success is self-belief, he said “you must choose the right friends and friends that are loyal to you”, He spoke about the importance of overcoming peer pressure and gang involvement. We discussed some of the current tensions within Brent and how he overcame this when he was young. George explained his resilience allowed him to pursue his education and achieve at Cambridge University.

people are authors of their own story, and they must take ownership rather than allowing other people to write their stories.

Feedback from participants has included:

“I think the programme is good because it gives you different perspectives on someone who has committed a crime(s) and is still able to achieve in society and make something of themselves. I learnt a lot about myself and my potential’.

‘it’s motivating seeing someone do well’

In order to develop and sustain capacity, YJS have continued a similar programme through the Roundtable Project which is now led by Community Safety and the YJS. Guest speakers from the community are invited to speak at this session similar to the format of Unlocking Your Potential

10.12 Radicalisation or extremist activity

The Youth Justice Board issued practice advice in April 2023 to support youth justice services to identify and manage children at risk of, or involved in, terrorist-related activity. This included dealing with children posing a terrorist risk and those arrested and convicted under the Terrorism Act 2000. The YJS has adopted this guidance and is also a

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member of the Prevent Operational Group. This allows youth justice perspectives to influence the shape of local anti-extremism provision and training. No Brent YJS children were referred to Channel in 2024/25.

10.13 Out of Court Disposals (O OCD)

Out of Court Disposal provision is tightly monitored in Brent. In each of the last five-years the YJS Management Board has received a report examining practice, procedures, and performance. Such high-level curiosity and interest reflect Brent's understanding of the clear links between intervening early and good outcomes. For instance, the Youth Engagement Fund toolkit shows that pre-court diversion nationally leads to greater reductions in reoffending (by 13%) than sentencing young people through Court Services. Furthermore, when children who have attended diversionary schemes do commit another offence, their offending is likely to be less serious.

The Brent YJS Out of Court Disposal Service offers effective assessment and early interventions to children and young people and their families. Its effectiveness is monitored by a Metropolitan Police led Multi-Agency Scrutiny Panel, comprised of senior representatives from the Police, CPS, Court Services, Judiciary, MOPAC and the YJB. The Scrutiny Panel audited six O OCD cases in January 2025. Decision making was agreed as correct and consistent with policy and guidance for all six cases.

The Child Gravity Matrix (CGM) is the tool Police use to determine the most appropriate outcome or disposal for children and young people who offend. The Matrix outlines the options available to the decision makers for both statutory (caution, conditional cautions, or prosecution) and non-statutory outcomes which in Brent include Community Resolutions and Triage. In November 2023, the Matrix was updated and now allows greater emphasis to be placed on mitigating factors which include vulnerabilities such as undiagnosed and diagnosed neurodiversity needs.

Keys changes include:

- Traffic Offences: the CGM now makes it clear that informal O OCDs can be considered as an alternative to penalty/points charge where appropriate.
- The CGM introduces the Child Information Form (CIF) which replaces the First Time Entrant Check list and a 10-point checklist for Looked After- Children to accompany cases being sent to CPS for a decision. The CIF is designed to collate and streamline the information provided by Police and other relevant agencies involved in the child's life, requiring both the investigator and prosecutor to consider the specific circumstances of a child.
- Clarifies that joint decision making should take place between the YJS and Police but that where there is a disagreement the final decision rests with the Police.

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- There have been various technical changes to the offences table, including remorse and regret being removed from aggravating and mitigating factors.

Brent YJS has adopted the YJB Prevention and Diversion Assessment Tool for Out of Court disposals. It enables greater analysis of how a child's behaviour can be the result of their life circumstances and helps identify their strengths. Furthermore, it provides a structured framework for assessment, interventions, planning, and the identification of risk factors.

All referrals for an Out of Court Disposal are discussed at the Out of Court Disposal Joint Decision-Making panels which are tightly organised and held weekly. Panel members include the NHS, Police, YJS, Social Care, Inclusion Service, Family Solutions and Family Support Workers. All professionals are involved in the discussion to determine any underlying issues and needs for each young person. Discussions take place around a child's life circumstances and impact that may contributed to their behaviour. The O OCD panel always aims to mitigate and lower the disposal where possible. If available victims' views are considered. YJS Police officers aim to get in contact with the victim prior to the panel and explain the diversion process.

Interventions for children who receive O O C D s, reflect their specific needs. Mental health screening is offered to all young people through referral to the NHS Youth Justice Liaison and Diversion practitioner. For those referred for drug related offences or where assessment has identified substance misuse, one-to-one sessions are offered by the Evel8 substance misuse team. Sessions include the law and drugs, county lines drug dealing, gang culture, criminal exploitation, abstinence, and harm minimisation. Other sessions delivered in 2024/25 included decision making, peer pressure, making better choices, online safety, sexually harmful behaviour, knife crime, weapon awareness, victim awareness, Police one to one sessions, crime presentations, Police led one to one sessions, and safety mapping. Case managers seek to include children in intervention planning wherever possible.

There were 76 referrals to the O C C D Team in 2024/25:

Community Resolutions: 23

Triage: 22

Youth Caution: 9 (100% successfully completed)

Youth Conditional Cautions: 14 (100% successfully completed)

Total: 67

Assessment and interventions are offered to all children and are mandatory for those who receive a Youth Conditional Caution. 67 young people undertook Safety Mapping – a contextual safeguarding tool that enables

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young people to identify non-familial risks in the community. 31 young people who were referred by the Police for drug related offences or where assessments identified substance misuse were offered one to one substance misuse counselling and groupwork sessions. Out of Court Disposals are one of the ten newly introduced KPI's monitored by the YJB – no. of young people successfully completing OOCs.

Feedback on OOCs

“Grandmother provided positive feedback on YJS involvement. She was grateful for the support provided to Y and the disposal agreed. Grandma was also happy with the advice and information provided to her around education and YJS supporting with liaising with the Inclusion Team.”
(OOC Case Manager, March 2025)

“Thank you for your work with D. She has built up a good working relationship with you and though D would never say it, she has valued your intervention. It has been great working with you!” (Social Worker, February 2025)

“The decision-making session was helpful – you helped me understand what would benefit me in a situation and what would not and how I should or could approach difficult situations.”
(Young Person, March 2025)

10.14 YJS Triage Programme

Triage is an OOC that is offered to young people who would otherwise be likely to receive a criminal justice disposal. It is available to young people who admit guilt to low gravity offences. The most common offence committed by children who take part in the Triage programme is possession of cannabis. The service is currently funded by MOPAC and has been identified as the most significant cause of the steep decline in the number of young people from Brent entering the criminal justice system. Children who complete Triage receive the same level of multiagency risk management that young people within the youth justice system receive. Triage is a short-term intervention that should not last longer than three months.

10.15 Policing

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Two Police Officers are based within Brent YJS. They work closely with YJS staff to administer and deliver OOCDS, share intelligence, enforce non-compliance, and engage with children known to YJS - this includes the delivery of groupwork and individual sessions.

The MPS' Children's 5-year Strategy (Sept'24) aims to make a meaningful difference to how the Met Police safeguard children and is designed to rebuild trust, reduce crime and ensure high standards across the force. In developing the strategy, the Met Police considered the views of children across London. Its aim is to keep children in London safe, build their trust and bring to justice those who abuse and exploit them. It proposes a child first approach with strategic aims and actions around building relationships, tackling discrimination, further increasing the use of OOCDS, strengthening schools and education provision, delivering precise and fair stop and search, and promoting routes into policing careers and volunteering. The success of this strategy will be measured through increasing the percentage of children surveyed by MOPAC who have a good opinion of the Police, feel they can trust the Met and believe the Police treat everyone fairly.

10.16 YJS Referral Order Programme

Referral Orders are a community sentence that require a young person to agree a contract of rehabilitative and restorative elements during a Referral Order Panel meeting. The YJS trains and recruits a diverse cohort of Panel members who reflect the diversity of Brent.

There are currently nine active local community panel members from Black, White British, White European, and Asian Heritage groups. Panel members come from a wide range of backgrounds including family support, teaching, accounting, business and law.

Panels take place on a weekly basis and consist of the following:

- Initial panels (where the RO contract of interventions is agreed with the young person).
- Review Panels.
- Non-compliance Panels
- Compliance review Panels.
- Final Panels.

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A young person and their parent were recently asked if they would change anything about the Panel they attended:

Young Person: 'Not really, I felt everything went well. In my opinion there's nothing that needs to be improved. It was better than I thought it would be'.

Mum 'I thought they (panel members) were fair, and they were engaged. What I liked was that they came across as though they really care. They were not judgemental, and we didn't feel judged. They came across as extremely supportive'.

Table 8. Referral Order Outcomes April 2024/25

Outcome	Disposals	Percentage
Successfully Completed	47	90%
Completed Other	1	2%
In Custody	1	2%
Not Completed (Order Revoked and Resentenced to Community Penalty)	1	2%
Not Completed Breached Order Revoked and Resentenced to Community Penalty (Terminated)	2	4%
Transfer to other agency/home YOT	1	2%
Total	52	100%

10.17 Restorative Justice (RJ) and Victims

Through engagement with RJ, Brent YJS seeks to empower victims and reduce reoffending by developing empathy within our children and young people. The YJS Partnership has dedicated staff who are innovative and creative in encouraging wherever possible victim and perpetrator engagement in restorative justice approaches.

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YJS practitioners are not always able to obtain victims views. This information can provide a unique perspective on how to keep children and communities safe. The YJS needs to work closely with the Police to identify and remove barriers to the timely acquisition of victim information. There are Police resourcing, capacity and systems issues which can make contacting victims difficult. For instance, if victims' details are not gathered by the investigating officer, delays will occur to YJS Police Officers being able to contact victims - and in some instances contact will never be made. Positively, in April 2025, the Metropolitan Police agreed a new approach that improves victim access.

This has been achieved by removing the Police requirement to gain the victims explicit consent to be able to share victim data with YJS. Furthermore, the Police have removed the requirement to send out the agreed victim letter to the victim, if they are unable to get through to the victim.

The new process means that upon receiving a YOT referral seeking an OOC, once the YOT Police have verified and confirmed the referral is suitable, they will continue to attempt to contact the victim to seek their wishes to share their basic details with the YJS. If the victim does not want to share their details no further contact will be made and the relevant YJS will be informed so this can be recorded on ChildView. If the victim agrees, or the Police are unable to make contact, they can automatically share sufficient victim data for the YJS to contact victims directly.

This process also applies to those cases which bypass the YOT referral stage and are convicted at court after a charge and sentenced to a court order to work with the YJS. For this to happen the YJS must request victim details. The Police will then seek to contact the victim. If they are unsuccessful victim details will be shared with a YJS so that they can contact the victim directly.

The Brent YJS Restorative Justice Worker has a manageable workload. Victims work is intensive so this could conceivably change now that the systems issues delaying victim consent have been resolved.

Brent YJS reparation activities have now extended into face-to-face work at a dementia Café with elderly people, Stonebridge Primary School, and at foodbanks operating out of Family Well-being Centres. These foodbanks enable young people to give back to the community in a meaningful way in a safe environment.

Brent YJS Victim Awareness Groupwork occurs on a quarterly basis for a period of six weeks. Feedback has been positive with excellent completion rates. Topics covered include establishing boundaries, values, the young persons', and the victim's experience, repairing harm and giving back to the community.

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The following quotes are typical of many victims and children and young people who took part in restorative justice in 2024:

Victims

"I'm glad you called me as didn't know RJ existed".

"I don't know if me and the victim would have ever spoken again if it weren't for RJ".

"It's good to know that young people have RJ to explore ways to repair harm. I'm happy to engage in any RJ of the young person's choosing".

"It's good to know that the young person is reflecting on their behaviour with the YJS and wants to repair the harm he caused to me".

"I am happy that I went ahead with the RJ process, it brought me closure."

"Although I wanted to rebuild the friendship, I understand that this is not possible now, but I am pleased that I could tell my side of the story."

"I was really frustrated throughout the investigation as I didn't feel that I was listened to. I am pleased that you called, and I can say what I need."

"I needed help at the time the incident happened. I wanted to prevent further harm. I am not happy with what happened at the time, but I think everybody involved has grown and now I can move on thanks for your work."

"It is good that you called and asked my opinion. I am pleased that the YP's intervention will address my concerns."

Young People

"Writing the letter (of apology) was the right thing to do".

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"I feel better for writing a letter as that's what I would have wanted".

"RJ got me thinking about my mum and how I would have felt if someone did that (his offence) to her".

"I wanted to put things right and I think my letter did that".

"I'm glad I could write a letter as I am sorry for what I did".

"I completed the Victim Awareness Group, and I liked the people doing the group, they were nice. I also learned different ways victims are impacted."

"I liked engaging with the other participants of the Victim Awareness Group where I learnt that crime can affect a lot of people that you would not have thought of."

"I wanted to meet the victim as I wanted to apologise. This was a great closure for the whole incident."

"I was sorry and embarrassed, and I wanted to say sorry from the beginning. I wrote a letter of apology to a community member as the victim didn't want any communication. I would have met the victim if he wished for it. RJ helped me to think about the impact of my actions on others."

"It's good to know that RJ is available."

Brent YJS Restorative Justice workers delivered 'Lunch and Learn' sessions to the whole CYP department in 2024. Brent seeks to build a restorative community by embedding restorative practice within both strategic and operational planning and delivery. We have also supported our full time Restorative Justice Worker to achieve the Restorative Justice Council's *Certified Advanced Practitioner* status.

Plans for 2025/26 include promoting the RJ offer to care homes and foster carers and extending the RJ Offer - currently offered to all victims of crime - to carers and key workers as a non-criminal remedy:

"I have learnt a lot of things from these offences. I've learnt that I should go down the right path. I should walk the other way and ignore negative friends," 17-year-old male.

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“Since the offence I have not been in any trouble and do not intend on getting into any trouble. I have learnt not to fight as it can affect many people including the victim, offender, community, and it can impact my future,” 17-year-old male.

“RJ has helped me look at the offence and my behaviour so I can put it in the past and get on with my life,” 16-year-old female.

“The main outcome for me was how an offence like this can truly affect the community. It really gave me a completely new angle on how to look at the crime from the perspective of someone that is a stranger to me and looks at the situation upon face value,” 18-year-old male.

Victims are one the ten newly introduced KPI's monitored by the YJB.

10.18 Education, Training and Employment

Nationally

Accessing good ETE provision, is crucial to the life chances of children under statutory supervision. It is consistently identified as one of the top three factors that need to be addressed by inspectors and the YJB. However, many children and young people have had negative educational experiences, and a proportion are entrenched in lifestyles that are not conducive to participation in ETE. This is often because of exploitation, gang affiliation and disrupted educational history. In June 2022, a *HM Inspectorate of Probation, Estyn, and Ofsted joint inspection of education, training, and employment services in youth offending teams*, involving 180 children from six local authorities, highlighted many of the strengths and challenges of ETE provision from a youth justice perspective. Brent children were not involved in the inspection.

Strengths

YOT boards consistently prioritised ETE work in the delivery of services, operational staff had enough time to deliver high quality work with children, staff had good access to training in recognising children's ETE needs, and YOTs delivering good ETE work had well-developed partnership arrangements, including specialist assessment and interventions.

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Areas for improvement

The quality of ETE work was poorest for those children who most needed it, and this was particularly evident when a child had an EHCP.

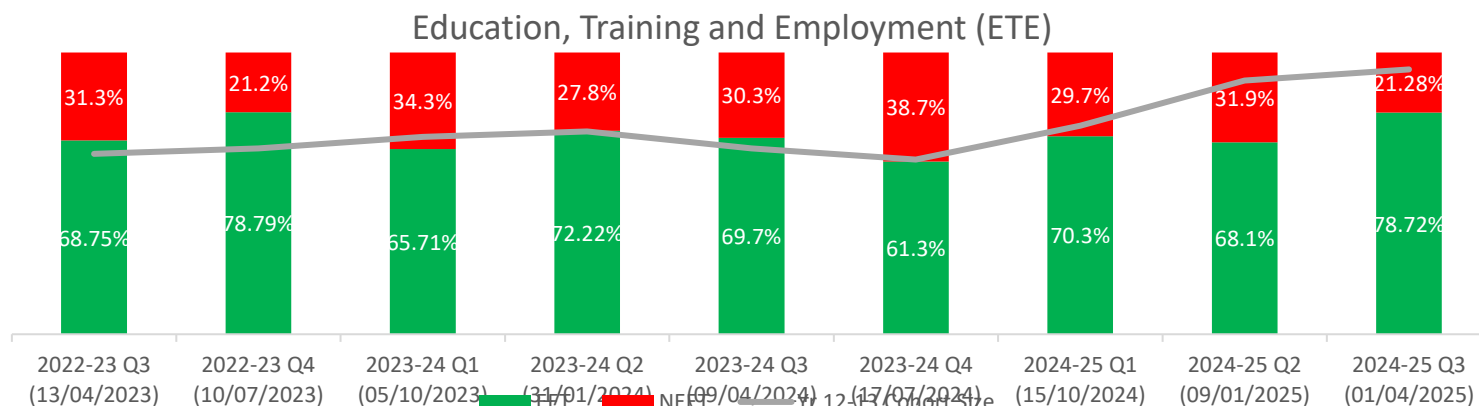
- There are too many cases where children were not making progress and whose vulnerability was increasing because of low levels of engagement in positive work.
- Boards were not monitoring key aspects of the children's engagement in ETE.
- There are significant barriers to participation.
- The quality of work was poorest for those children who most needed it.
- The support provided to the child to engage in ETE should be clear and reviewed regularly.

Employment – Training and Education (ETE) in Brent YJS

The characteristics of a strong YJS Partnership, as identified by HMIP and Ofsted, exist in Brent. The YJS Management Board scrutinizes the NEET cohort every quarter. This oversight has been extended to all children due to the national inclusion of education as a YJS Key Performance Indicator. The Board also ensures staffing levels are sufficient and there is access to a wide and varied training offer. Clear pathways between Brent YJS and mainstream and alternative education providers means that significant progress has been made towards making HMIP and Ofsted's recommended improvements. This includes increasing commitment to participation work in schools and a new quality assurance regime which ensures all assessment and case actions are undertaken within agreed timescales. Operational work is monitored by a supportive Board that maintains tight oversight of the relatively small but challenging number of NEET young people known to Brent YJS.

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Table 9. Brent NEET population 2022 to 2025: YJS children and young people



Operationally, ETE is shaped by intensive joint working between YJS, commissioned ETE provider Prospects, and the Virtual School for Looked After Children. Staffing capacity has increased and there is greater emphasis on access, monitoring and quality of provision. This includes:

- A NEET working group which meets monthly to monitor vulnerable young people not in education and ensure that plans are in place.
- The provision of employment and training data from the YJS to Prospects on a fortnightly basis so that interventions are put in place at the earliest opportunity and any children who have no recorded provision are identified.
- Working closely with custodial units to ensure children and young people have a transition destination at the point of resettlement.
- Ensuring that Prospects advisors are working closely with parents and YJS Case Managers, other professionals, and families.
- Deploying additional staffing when children and young people are already receiving support from a generic Prospects Advisor.
- The NEET group has extended its scope to include a PLIAS Employment Advisor who can provide specialist support to those seeking employment and the construction CSCS card.
- EHCP work is now more comprehensively reflected in Asset Plus and PSRs.

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- Close working with the Brent Inclusion Team. This includes the Inclusion Team Manager attending the Multi agency High-Risk Panel.
- The ASER programme offers a series of individually developed units preparing long-term YJS NEET young people for work or training.
- Brent Connexions delivered a re-engagement programme between February and April 2024. This included a series of employability groupwork job skills sessions for young people known to Brent YJS.
- Supporting children with undiagnosed learning needs is an ongoing challenge. Brent YJS works closely with the Brent Inclusion Service. Regular joint service area management meetings take place and can be used to identify training that can equip staff to better identify and refer children who are eligible for SEND and other Inclusion Service support.

Table 10. Brent YJS ETE Suitability April to December 2024

ETE suitability	
ETE Suitability	No. of Young People
Suitable	48
Unknown	0
Unsuitable	16
Total	64

Speech and Language

Brent YJS has identified significant deficiencies in access to provision relates to Speech and Language assessment and therapy. This is despite conservative estimates suggesting 40-60% of children in the youth justice system have an undiagnosed language disorder, *Winstanley, Webb & Conti-Ramsden (2021)*. Findings also suggest that Developmental Language Disorder (DLD) is the highest predictor of reoffending, and that children with DLD are 2.6 times more likely to reoffend. Furthermore, one year after committing an offence:

- 62% of people with DLD reoffended
- 25% of people without DLD reoffended.

Despite significant efforts to address this service gap in recent years, YJS still does not have access to the health resources needed to improve outcomes for children with undiagnosed speech and language needs. Work undertaken

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in the last year to resolve this shortcoming includes YJB facilitated meetings with the NHS, Head of Service discussions between Brent Early Help and the Brent Inclusion Service, and ongoing YJS Management Board oversight. In April 2025, the YJS Management Board representative from the NHS offered further support to the YJS aimed at accessing pathways to SALT assessment and support for Brent children in the youth justice system.

10.19 Mental Health and Emotional Wellbeing

Local Strategy

The Children & Young People's Mental Health and Wellbeing Local Transformation Plan 2024/25 has high ambitions for better mental health and wellbeing for every child and young person living in North-West London. These include developing inclusive, fair, and equitable services that are reasonably adjusted to support people with more complex needs, including those with learning disabilities and autism.

The North-West London Integrated Care Board (ICB) was formed in July 2022, to closely collaborate on several aspects of the Children and Young People mental health pathway. This includes implementing the National Thrive Framework which provides a set of principles for creating coherent and resource-efficient communities of mental health and wellbeing support for children, young people, and families. Thrive aims to talk about mental health and mental health support in a common language that everyone understands. This, and plans from the NW London CYP Mental Health Steering Group to embed the CYP Mental Health pathway within Family Wellbeing Centres will enable better access to mental health services for children supported by YJS.

Local delivery: CAMHS

A CAMHS Mental Health Practitioner (MHP) based within YJS supports young people who have severe or complex problems to access specialised CAMHS provision. The post was vacant between September 2024 and February 2025.

Table 11. CAMHS Mental Health Support April to September 2024: YJS young people have requested more data re table below)

Mental Health Support:	No. of Young People
Advice / Consultation	18
Referrals and Signposting to other services	7
Referral to FCAMHS / Ongoing liaison	5

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Referral to Tier 3 CAMHS	4
Total:	34

The positive outcomes achieved by the seconded CAMHS MHP include:

- Efficient information sharing, better care, and more effective multi-agency collaboration between YJS and CAMHS, as all young people who come under the CAMHS Effective Treatment Team are case managed by the MHP working across both teams. This allows the MHP to access specialist, multi-disciplinary advice from CAMHS which is shared with YJS Staff to facilitate cohesion and psychoeducation.
- Upskilling and psychoeducation provided to YJS case managers around mental health needs; including discussions alongside Social Care to promote a sense of stability and safety prior to intensive therapeutic interventions.
- CAMHS worker provided training for YJS (October '24) about mental health and neurodiversity in the context of offending behaviour. This will help better outcomes and more robust treatment plans.
- Dedicated liaison with FCAMHS to improve care and outcomes for young people; Including initial referrals, individual consultations with FCAMHS clinicians, dissemination of key information and advice, arranging and chairing network meetings, and navigating differences between services to allow collaboration around safety plans and risk mitigation. This helps alleviate workload from core network members, allowing for greater care provided to each specialism whilst also promoting cohesion and multi-agency collaboration.
- CAMHS and BCYP worker ran a four-week group for young people within the YJS exploring their emotional wellbeing in January 2025.
- Brent YJS will explore opportunities to expand referral pathways to mental health and other health provision through the establishment of TPH.
- CAMHS will provide mental health and neurodiversity training to Social Care, School and SENCOs during 2025 in the context of offending behaviour.

Mental Health Support (Help and Advice) is one the ten newly introduced KPI's monitored by the YJB.

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Local Delivery: Liaison and Diversion

The NHS England funded Youth Justice Liaison and Diversion scheme in Brent offers mental health screening to young people held in Police custody at Wembley Police Station, or those young people referred to YJS for an Out of Court or Turnaround disposal. The CNWL employed Youth Justice Liaison and Diversion (YJLD) Mental Health practitioner identifies any unmet mental health and neurodiversity needs a young person may have (ASD, ADHD, learning difficulties, or SALT) and refers on to appropriate health services. The service is monitored by the Brent ICS Lead, NHS and YJS.

Children are risk assessed and seen at a range of locations including the Brent Civic Centre, school, home, care homes, or community facility. Engagement takes place with parents, schools, Social Care, and other agencies where necessary - especially when there are unmet needs that require attention. The YJLD worker also attends CP, CIN conferences, professionals' meetings, and other meetings to help meet a young person's additional needs.

During the period April 2024 to March 2025, the YJLD worker engaged 148 young people. One hundred and twenty-nine of these were males (87.2%) and 19 were females (12.8%). Sixty-two (41.9%) assessments were completed. Over the period April 2023 to March 2024 the YJLD worker engaged 161 young people. Seventy-eight (49.8%) assessments were completed. During 2024 the YJLD worker engaged 160 young people. Ninety-one (57%) assessments were completed. The four key offences that children accessing YJLD were charged with were drug possession, violence against the person, robbery and possession of an offensive weapon. 16 and 17-year-olds form the highest age group.

10.20 Substance Misuse

Since becoming operational in 2000, more than 1,500 young people supported by the Brent Youth Justice Service have received community-based substance misuse support. After considerable planning in partnership with Public Health, approval was obtained in January 2025 from both the Brent Drug and Alcohol Board, and the Brent Youth Justice Management Board, to develop a single pathway from Brent YJS to substance misuse provision.

Under these arrangements, *Elev8*, a provider of community-based alcohol and drug detoxification services for residents in the London Borough of Brent, have been supporting all children known to the YJS who have come to the attention of YJS for committing drug or alcohol related offences or have subsequently been assessed as having substance misuse needs. These services have been accessible from VIA - the name of the substance misuse and other support services *Elev8* offer children.

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The two pathways by which children enter the youth justice system remain unaltered. The first of these are OOCs. These allow the Police to deal effectively and proportionately with low-level, often first-time offending without a prosecution at court. The other pathway by which a child will receive statutory support from a Youth Justice Service arises when a child appears before a court. If convicted, a youth court can give a range of criminal disposals including fines, Referral Orders, Youth Rehabilitation Orders, and custodial sentences. VIA have been supporting children who have become known to YJS through this route since 2017. They have maintained a co-located presence with YJS at the Brent Civic Centre throughout this time.

Table 12: Children receiving Court Orders or OOCs for drug offences 2017 to 2024: by number and percentage.

Year	Court Orders by no. of drug offences	Court Orders by percentage of drug offences	OOCs by no. of drug offences	OOCs by percentage of drug offences
2017	125	67.57%	60	32.43%
2018	138	70.77%	57	29.23%
2019	107	67.72%	51	32.28%
2020	57	52.78%	51	47.22%
2021	33	42.86%	44	57.14%
2022	28	45.90%	33	54.10%
2023	24	46.15%	28	53.85%
2024	26	50.98%	25	49.02%

Table 13: Drug offences by type, and substance misuse provider December 2023 to November 2024.

Drug offences: court convictions by drug type and percentage			Drug offences: Police issued OOCs by drug type and percentage		
Court Pathway			OOC Pathway		
Cannabis	Cocaine	Heroin	Cannabis	Cocaine	Other

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19	5	2	27	1	1
73%	19%	8%	93%	4%	3%

The development of the single pathways approach has been influenced by several factors.

- Fewer children supported by Brent YJS have accessed substance misuse provision in recent years. There is an opportunity to treat more children by refreshing referral pathways in a way that targets more children and young people supported by YJS.
- Introducing a less rigid system is now achievable and would allow substance misuse provision to be sequenced in line with the needs of the child, rather than the operational necessity to move a large volume of children into substance misuse support at the earliest opportunity.
- The majority of substance misuse delivery takes place at the Brent Civic Centre. Using a secure central office is ideal for coordinating back-to-back appointments. However, there are instances where accessing other sites would better serve the needs of children and families. It would also provide the added benefit of introducing children and their families to other provision offered at community centres
- There is real scope to put processes in place that ensure there is a consistent approach to making treatment services available to those hard to engage young people who fall through the cracks in existing pathways.
- The Metropolitan Police's *Children Strategy 2024* introduces a child first approach to policing in London. This means that the proportion of children supported by YJS's (approximately half of all Brent cases) is expected to increase significantly. Existing pathways need to be modernised to reflect this change as they were created when OOCs were a small proportion of YJS work.
- Remapping pathways enables Brent YJS and VIA to add greater value to each other's work. Partnership working between the two services is strong and benefits from good case management oversight and regular meetings. There are however many opportunities to strengthen this further through greater aligned working such as ensuring YJS staff accompany children to all first substance misuse appointments regardless of location, and where relevant to support and encourage children to access wider VIA provision including support groups and emotional wellbeing services.

10.21 Appropriate Adult Service

Brent's Appropriate Adult service sat with Adult Social Care until 31 December 2024 when the responsibility was transferred to CYP. AA services are contracted to the Appropriate Adult Service Limited (TAS). In March 2025, OCSLT approved the continuation of this arrangement. Costs will be shared across CYP and day to day management of the contract will sit with Brent YJS.

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10.22 Wider Services

Two hundred and one children and young people received a court disposal, Out of Court Disposal, Triage disposal, a Community Resolution or Turnround in 2024. Of these, 8% were on a Child Protection Plan, 26% were Children in Need, and 16% were Looked after Children. These services are classified as 'wider services' by the YJB. More than half of all children supported by YJS (50%) accessed wider statutory provision. Wider Services are one of the YJB's ten new KPIs.

Table 14. YJS Alignment with Wider Services 2024

Wider Services 2024		
Wider Service	No. of children	%
Total no. of children receiving a court sentence, O OCD, Triage or Community and Turnaround	201	
Child Protection	16	8%
Child in need	52	26%
Looked after child	32	16%

10.23 Disproportionality in the Brent Youth Justice System

Reducing disproportionality in the youth justice system is a highly challenging priority across London. The failure to achieve equity of treatment for all children in the youth justice system can also be found in Brent when using the YJB Summary Ethnic Disparity Tool to analyse children aged 10 to 17 years. This is particularly evident amongst Black African and Caribbean children and young people who are significantly overrepresented in the youth justice system. Overall, Black Heritage group children represented 37% of the Brent YJS cohort in March 2025. This compares unfavourably to the 22% of all children and young people from these other heritage groups living in Brent according to the mid-year 2021 census. The table below shows the breakdown by ethnicity over the last 5 years.

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Table 15. No. of Brent Children in the Youth Justice System 2020 to 2025 by ethnicity

Ethnic group	2020	2021	2022	2023	2024	2025	Percentage change year ending March 2020 to March 2025	Percentage change year ending March 2024 to March 2025	2021 midyear 10-17 population by ethnic group
Asian	19	13	6	17	8	11	▼ -42%	▼ -58%	10,322
Black	92	70	46	60	60	56	▼ -39%	▼ -34%	7,982
Mixed	14	10	11	12	13	24	▲ +71%	▼ -7%	2,764
Other	17	9	16	14	27	33	▲ +94%	▲ +59%	4,287
Total BAME Heritage Groups	142	102	79	103	108	124	▼ -12%	▼ -24%	25,355
White	26	22	18	20	15	22	▼ -15%	▼ -42%	7,899
Unknown	0	2	3	1	0	4	N/A	N/A	-
All Heritage Groups	168	126	100	124	123	150	▼ -11%	▼ -27%	33,254

What Brent YJS is doing to tackle disproportionality

Improving practice

- Trauma informed practice has improved the ability of YJS practitioners to tell the story behind the crime within the pre-sentence reports and the wider assessment and planning process. This includes explaining the experiences of children who have been adversely impacted by gang exploitation or have suffered trauma.
- Practice Development Sessions. These are held regularly and includes themes including Social Graces, and cultural competency (delivered by Young Brent Foundation).
- Background information has been expanded to include any experiences of discrimination or trauma to the courts.
- YJS case studies are shared at YJS Board meetings where attention is given to exploring whether the diverse needs of children have been considered.
- The CYP and YJS Audit programme monitors the quality of provision children receive.
- Magistrates training.
- Child first approaches. Relationship building, coproduced intervention plans, listening to children, participation work and annual surveys:

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- Group supervision. Social Care and the Brent YJS work collaboratively whenever Looked After Children (LAC) enter, or are at risk of entering, the youth justice system. This was enhanced in January 2022 by the adoption of joint case supervision. These arrangements formalised existing good practice by regularising ongoing joint risk management and decision making. Practitioners from partner agencies including CAMHS and the PDU participate in group supervision whenever this is in the best interests of the child.
- Out of Court Disposal Decision Making Panel. This weekly Panel is chaired by Brent YJS and attended by Police, Health, YJS, Social Care, Early Help staff and Restorative Justice workers to jointly consider and determine Out of Court Disposal (OCD) decisions. Social Workers attend the Panel - or complete a Professionals Information Form - since November 2021. This has strengthened our ability to take mitigating factors into consideration and identify appropriate interventions and disposal conditions.
- *The Joint working protocol between Brent Youth Offending Team and The Probation Service (Brent Probation Delivery Unit PDU)*. Created in May 2022, this Protocol outlines the operational procedures and standards required when transferring supervision from the YJS to the Brent Probation Service.
- Since December 2021, LAC Social Workers have contributed to all transfer meetings between the YJS and PDU. This ensures that planning is as supportive as possible for LAC Young People moving from the youth justice system to the adult criminal justice system.
- Access to Family Support Workers has enabled the YJS to support the whole family, not just the young person.
- The early identification of neurodevelopmental disorders and help in education at an early stage could combat the entry of Black heritage group children into the criminal justice system.
- The collaborative culture in CYP means that Social Care and YJS work together every day in a range of ways including Strategy meetings, at risk of custody meetings, and preparing bail packages.
- Introduced in 2022/23, the annual Brent Youth Justice Service Disproportionality Action Plan (DAP) has been created to understand the extent to which youth justice disposals are disproportionately served, monitor the effectiveness of initiatives undertaken by YJS to support children from Black Heritage groups, and to consolidate actions youth justice partners are undertaking to tackle overrepresentation. The DAP is monitored by the Brent YJS Management Board biannually. In 2024/25 the DAP focussed on preventing Black Heritage group children entering the criminal justice system, preventing re-offending within the Black Heritage cohort, preventing school exclusions, improved ETE outcomes, improving access to early support for ASD or neuro disabilities to prevent entry and re-entry into the criminal justice system, reducing disproportionality in custodial outcomes, and listening to children's voices and understanding their experiences.

It is difficult to attribute the extent to which Brent YJS has contributed to a steady decline in the number of Brent children from Black Heritage groups in the local youth justice system: a 39% reduction between March 2020 (92) and March 2025

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(56). It is hoped however that the concerted partnership effort to reduce disproportionality is a key factor. Notwithstanding these gains, it must be noted that the overrepresentation of children from Black heritage groups remains and is significant.

10.24 Prevention work - Targeted Work and our Wider Reach

Targeted Prevention Hub (TPH)

The development of our new Targeted Prevention Hub (TPH) located within the Brent Youth and Youth Justice Service brings together existing adolescent-focussed resources across Early Help and Social Care to provide an expanded range of preventative support to children and young people in Brent. Due to be introduced in stages from June 2025, it will also introduce a new Family Group Conferencing Service.

TPH is a non-case holding service that is expected to achieve a wide range of benefits including:

- Providing more support to services tackling risk outside the home.
- Strengthening Brent's approach to prevention and early intervention.
- Expanding resources for children returning home from care and supporting reunification with families.
- Unifying and coordinating existing resources from across Early Help and Children's Social Care.
- Improving experiences for children, young people, and families – providing a single, dedicated referral pathway.

By creating a single pathway across Children's Social Care, TPH will fast-track access to a menu of services, including:

- Careers advice e.g. for children who are NEET.
- Sexual Health advice (NHS/VCS).
- Expert advice re child sexual exploitation.
- 1:1 support for children who are gang affected/affiliated.
- Out of hours detached youth work.
- Mentoring.
- Missing children support.
- CVS enrichment provision e.g. Young Brent Foundation.

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- Mental health support including CAMHS and WEST.
- Substance misuse support from VIA.
- Contextual safeguarding support e.g. peer mapping, safety mapping, complex strategy meetings, and intelligence sharing.
- Brent YJS Turnaround.
- Educational awareness sessions on crime and exploitation.
- Family group conferencing.
- Reunification of children returning from home from being looked after.
- Domestic abuse with Advance.

Turnaround Programme

Developed by the Ministry of Justice, Turnaround is based on similar principles to those underlying the Supporting Families programme, including the view that children on the cusp of offending often have complex needs that should be supported. It also recognises that supporting the needs of the whole family is an effective means of reducing the likelihood of children entering the youth justice system.

Brent Turnaround is a four-year programme which has been funded by the MoJ until April 2026 to:

- Work and offer additional support to young people who are on the edge of entering the criminal justice system.
- Support young people who come to Police attention.
- Prevent further offending.
- Help young people and their families where there are concerns around behaviour at school, in the community or at home.
- Achieve positive outcomes for young people.

Turnaround extends support offered through the OOC Team to young people aged 10 to 17 years who are:

- Subject to a No Further Action (NFA) decision.
- Subject to a Community Resolution.
- Receiving a first-time youth caution.
- Released under investigation (RUI) or those subject to pre-charge bail (PCB).
- Discharged by a court.

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- Acquitted at court.
- Fined by a court.

All the 70 Brent children who have accessed Turnaround in the three-year period up to March 2025 were either referred by the Police or Brent Early Help. Approximately 90% of referrals came via the Police. This is significant as prior to Turnaround these children would not have been given access to services. Staff work hard to encourage families to access Turnaround. As it is a voluntary intervention consent from a young person and their family is required.

Table 16. Turnaround Referrals April 2024 to March 2025

Outcome	No. of Young People
Refused intervention / Not started intervention / Not Completed intervention	3
Partially Completed	0
Successfully Completed or in still in active intervention	46
Total no. of young people	49

Turnaround staff meet with young people and their parents to ensure the whole family participates in a holistic assessment. This is to identify needs and identify any family issues or factors affecting a child or young person's behaviour. Young people who have received an Out of Court Disposal will also be assessed using the Brent YJS Diversion and Assessment template.

Turnaround participants are offered support including an NHS Mental Health screening assessment, substance misuse assessment and interventions, education training and employment advice, mentoring, and positive activities.

Turnaround outcomes include:

- Young people getting back into education or training.
- Increased self-esteem and confidence.

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- Young people identifying their goals and creating a plan for their future. Having something to aspire to gives them more purpose and motivation to change their behaviour and engage with services.
- Providing children and families with a safe space to express their thoughts and feelings, wishes and hopes. This is something they may not have been able to do before.
- Helping children to identify their trusted adults and support network.
- Understanding what makes healthy family relationships. This enables participants to assess their current relationships and identify those that may be exploitative and unhealthy.

Engage

Engage is a MOPAC Funded project that since September 2023 has provided a range of youth work support in Police custody suites across the NW Borough Command Unit. Barnet are the lead borough and have recruited youth workers who are based in the Wembley and Colindale custody suites. Youth workers meet young people in custody and offer a further two meetings post custody. During this time, they are given information, advice and signposted to Brent Early Help and Youth Justice Service interventions. Engage is open from 8am to 8pm weekdays with a reduced level of cover over weekends. Brent has an Engage SPOC working collaboratively with the Barnet Service Manager who reports progress to the YJS Management Board via the Brent Youth and Youth Justice Manager. Engage is funded until the end of 2025/26.

Your Choice

Your Choice provides training in CBT techniques to youth practitioners working with young people aged 11-17 years at elevated risk of harm. Comparing the outcomes of the treatment and control group measures the impact of Your Choice so long as the two groups are similar to each other. Teams of practitioners are randomly allocated to train and deliver Your Choice. Young people matched to trained practitioners received Your Choice. Young people matched to untrained practitioners are supported as per business as usual.

Since its introduction in Brent in 2023, 49 children and young people have been recruited to Your Choice from the YJS, Accelerated Support Team, and Children's Social Care. This is broadly similar to the 1,463 children who have received Your Choice across 31 London boroughs in the period 2021 to 2025 – an average of 47 per Local Authority. Many of the young people who engaged with the programme were at risk of contextual harm. Seventy percent of participants completed the 12-week programme.

Feedback from YJS Case Managers was very positive:

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"I have seen a noticeable difference in the behaviours and responses of the YP engaged with the YC Programme. Particularly, those children who are part of the treatment group have been afforded the opportunity to explore their thoughts and behaviours and the emotions attached. As a result, I have found the programme to be an effective method of engaging YP that are willing to explore these areas of their lives."

Your Choice funding was due to finish at the start of April but has been extended until June 2025. Brent has been invited to submit a bid to run a further 12-week programme. A proposal is being developed which if successful would be based within the YJS and made available to children involved in the youth justice system. A report focussed on the pan-London impact of Your Choice is due to be published by Youth Endowment Fund at the end of Oct 2025.

Provision of parent workshops

These workshops are popular with parents who appreciate meeting other parents in a blame free environment and learn about a variety of themes such as online grooming, county lines drug dealing, parenting styles and the negative impact of social media. These workshops have been a response to *the Children Commissioners report on Young Lives (April 2022)*, that found families often do not know where they can get help and then feel blamed when engaging in programmes. Brent YJS has an ongoing commitment to providing parent workshops as well as offering the Strengthening Families, Strengthening Communities Programme which is focused specifically on parents who have concerns about youth violence.

All parents benefitted from the work that covered topics on exploitation and county lines. Feedback from parents includes:

"Learned and was shocked about the drug houses and the dirty conditions young people are made to stay in. Also, young people are staying with strangers who also might have risky behaviours."

"Surprised to learn about the way in which the gangs are so well organised. Helped me reflect on my son's behaviour and there were signs there that he could have been groomed and how the groomers behave to exploit young people."

"Didn't know that these gangs were so well organised. Learned to be more alert. Learned that it is adults who are in charge of grooming not just teenagers".

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“Learned that the numbers of young people being groomed is high and well organised”.

Parents all commented positively about their experiences attending substance misuse workshops for parents:

‘I learnt a lot more awareness and safety tips - I would like to continue with these meetings so I can get a more detailed understanding about our children today. Overall, the meeting was a blessing because I came out knowing more than I did going in’.

Trainers commented positively about the participants who attended substance misuse workshops for parents:

“Families felt supported and have appreciated the wraparound support and advice/advocacy that had been offered.”

“Grateful for the insight into their child(s) behaviours and the YJS.”

“Thankful for the awareness given to widen knowledge around how drugs affect their child and its impact.”

“Appreciative of having someone to listen to their concerns, as they felt heard”

“Grateful for the groups they had been referred to as it helped resolve some of their concerns and given them ample information, that in some cases they thought they wouldn’t need.”

10.25 Case Work Practice and Quality Assurance

The YJS audit framework has been shaped by revised case management guidance and HMIP lines of enquiry and is closely aligned to the Brent CYP Quality Assurance Framework 2023-2026. This sets out the quality assurance activities which help the Children and Young People Department fulfil its core values, to make the most positive impact and improve outcomes for Brent children and young people:

- Places children and young people and their families at the heart of service design and delivery.
- Adopts a child/family journey approach to service delivery.
- Holds the views of children and young people and their families as of paramount importance.

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- Ensures that staff can spend as much time as possible with children and young people and their families so that they can make a real difference to their lives.
- Enables children and young people and their families to only tell their story once and be able to rely on long-term relationships with CYP professionals.

The CYP Quality Assurance cycle supports Brent to be an outstanding learning organisation through understanding what is working well, what needs to change, identifying new ways to measure the impact of our work. It drives the gathering and analysis of information, the development of action plans for individual children, staff and services and a review of outcomes. Brent YJS contributes to the quality assurance outcomes achieved as part of the CYP Annual Audit Programme. This is an intensive programme of monthly auditing of CYP service areas which in May 2024 included the topic: *Quality of work with LAC and care leavers on remand or in prison*. The YJS Management Team sought to assess the effectiveness of this by undertaking a dip sample of 30 Social Care case files. As part of the analysis, the YJS Quality Assurance & Practice Development Manager concluded that the quality of work with LAC and Care Leavers in custody was good overall. Led by the YJS Quality Assurance and Practice Development Manager, YJS Team Managers also undertook a peer audit of ten intervention plans. Applying HMIP inspection standards, eight out of ten intervention plans were assessed as Good” - the remaining two were both assessed as “requires Improvement” - one of these did not provide a rationale for its assessment of risk safety and wellbeing, and the other was not saved within ChildView. Team Managers supported their Case Managers to make the necessary improvements in both instances and good Intervention Planning has subsequently been afforded significant attention within Practice Development sessions. Other YJS audits have focussed on risk, safeguarding, education, mental health, trauma, cultural competency, and diversity. Audits undertaken during 2023/24 included a full case audit on management supervision and oversight, Pre-Sentence Reports, and Out of Court Disposals. Learning from case audits is a standing agenda item at YJS Team Meetings. Overall, audit results show an upward trajectory of good practice - especially around the quality of recorded outcomes. Areas requiring improvement identified as part of the auditing process are addressed by line managers and during monthly practice development sessions led by the Quality Assurance & Practice Development Manager. In collaboration with Barnet, a cross-borough peer audit of Brent and Barnet OOC cases is due to take place in June 2025. Auditing programmes due to commence in 2025/26 include peer audits of case files to assess recording practice, national standards adherence, and assessing the standard and use of desistance factors. YJS cases are also subject to ongoing audits and support undertaken by the YJS Quality Assurance & Practice Development Manager.

YJS has developed a bespoke and more child friendly intervention plan than the one available within the Child View Assessment framework. The intervention plan was created by an Intervention Planning Committee, led by the YJS Quality Assurance and Practice Development Manager in consultation with Case Managers, Deputy Service

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Manager, Team Managers, the YJS Liaison and Diversion Officer and a young person receiving support from the YJS.

10.26 National Standards Audit and Subsequent Reviews

The Youth Justice Board required Brent YJS to assess how well they complied with 2019 National Standards. The review in Brent took place between November 2019 and March 2020, across five new Youth Justice National Standards themes. Members of the YJS Management Board led the review. They were supported by YJS Managers and operational staff to form one small working group for each standard. The review covered strategic and operational practice. All five National Standards: Out of court disposals, at Court, the Community, in Secure Settings, and Transitions, were rated good for both the strategic and operational self-assessments.

YJS Team managers have been trained to audit national standards and have undertaken subsequent reviews of their lead areas - led by the Quality Assurance and Practice Development Manager. A review of the Court National Standard was completed in July 2023. Two improvements relating to the management oversight of court processes were identified and subsequently remedied. Overall, the audit showed good compliance with National Standards. It was submitted to the YJS for moderation – ratings remained unchanged.

11.0 Challenges, Risks and Issues

The cost-of-living crisis has provided significant challenges for children, young people, and their families. It has exacerbated tensions within the home, affected mental health and produced poor ETE outcomes. Although restrictions have long been lifted, the COVID-19 pandemic created long lasting challenges for many children. For example, some young people have been exposed to hardships that have affected their physical and mental health, experienced increased poverty and social deprivation, and experienced loneliness and a loss of support networks. For children from Black and Minority Ethnic communities, the impact of loss has been comparatively greater. To respond successfully to these challenges there may well be resource demands within the YJS in the years ahead. The effects of these socio-economic factors in Brent cannot be fully predicted but it is possible for example, that robbery, theft, and other forms of acquisitional crime such as shoplifting may increase.

Strong leadership, good governance, and a committed and determined workforce provide Brent with good reason to feel confident about achieving our ambitions for 2025-2028. We trust our stakeholders and partners to provide the

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support needed to ensure we respond effectively to the challenges that accompanied the introduction of ten new performance KPIs and our inspection preparation provides an additional layer of Quality Assurance Brent's commitment to ongoing youth justice improvement and innovation is nonetheless resource dependent. Brent has worked creatively and flexibly to protect and improve frontline service provision. However, the possibility of public sector funding reductions in the years to come, combined with cost pressures stemming from increasing local housing demands, pose a risk to the current concerted partnership effort to reduce serious youth violence, reoffending and compromise our dedicated commitment to improving outcomes for children and young people in the criminal justice system.

12.0 Service Improvement Plan and Looking Forward 2025-2028

12.1 Brent is committed to the priorities outlined in the YJB Strategic Plan 2024-27, Thematic and Area Based Inspection recommendations, and the *Brent ways of working, this is Brent, this is how we grow*. In keeping with this, the following are the principal aims and commitments that will shape the Brent YJS partnership in the next three years.

1. Embed the new Targeted Prevention Hub within Brent.
2. Develop ever closer links with the voluntary and community sector – to include the ongoing identification of partners to join the TPH.
3. Implement and manage new substance misuse arrangements within Brent.
4. Embed new Appropriate Adult arrangements within Brent.
5. Increase access to victim's support.
6. Work with partners to develop pathways and create access for Speech and Language Therapy.
7. Refresh, implement, and monitor the Brent YJS Disproportionality Action Plan to tackle the over representation of children from Black Heritage Groups in the Brent Youth Justice System.
8. Support the delivery of the Brent Youth Strategy.
9. Collaborate with Social Care to reduce the criminalisation of children in care and care leavers.
10. Continue to promote evidence-based Child First approaches as the best means to reducing victims, promoting public protection, keeping communities safe and supporting children towards positive outcomes.
11. Support MPS Children's Strategy recommendations to help keep children in London safe, build their trust and bring to justice those who abuse and exploit them.

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12. Continue to build a YJS partnership culture that encourages diversity in its workforce, promotes anti-racist practice in its thinking and inclusivity, is supportive, encourages personal responsibility and is outcomes focused.
13. Continue work within the YJS Management Board, the wider partnership, and YJS staff to prepare for the current round of HMIP Inspection, through a YJS focussed programme of case file audits, thematic Practice Development sessions and focused individual supervision.
14. Broaden access to mentoring with clear referral pathways.
15. Develop plan to expand the remit to care leavers who are involved in the criminal justice system

The above aims and actions will be included within the annual Brent Youth Justice Improvement Plan 2025/26. Activity will continue to focus upon our key themes to improve our performance, tackle serious youth violence, strengthen our partnership culture, improve our prevention offer, strengthen our staff and workforce, become more evidenced based and creative in our practice, and be inspection ready.

12.2 HMIP Inspection Standards Review

12.3 In March 2025, Brent YJS completed a 23-page self-evaluation: *Brent YJS: HMIP Inspection Standards self-assessment*. The report assessed Brent YJS readiness for inspection by His Majesty's Inspectorate of Probation (HMIP) - the independent inspector of youth justice and probation services in England and Wales.

12.4 The report outlines the two types of inspections Brent may be subject to prior to assessing Brent YJS's strengths and areas for improvement against each of HMIP's inspection standards. Information used to evidence performance include audit findings, scrutiny panel findings, service user survey responses, parents and carer survey responses, magistrates feedback, feedback from other professionals, the Brent Youth Justice Plan 2024/25, quotes from children and young people, and lead area analysis from the YJS Management Team.

12.5 The work of Brent YJS was rated Good overall. There were also seventeen recommendations that will be incorporated into the Brent YJS Improvement Plan:

Domain One recommendations

1. The creation of a three-year Youth Justice Plan.
2. Increase youth participation at YJS Management Board Meetings.

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3. Identify priority policies and devote time to increasing staff awareness.
4. Introduce a staff survey cycle
5. Director's briefings and Serious Incident Notifications to be stored in one place
6. Identify training that can equip staff to better identify and refer children who are eligible for SEND and other Inclusion Service support.
7. Pre-supervision mini audits must be routinely completed.
8. Compliance actions must be followed up within 24 hours and Management Oversight must be evident.
9. Gain access to the resources needed to improve outcomes for children with undiagnosed speech and language needs.
10. Closer data sharing and alignment with the Brent Community Safety Team.

Domain Two recommendations

11. YJS Team Managers to ensure that the full extent of the support and guidance provided to Case Managers is evidenced as management oversight on Child View.
12. Work closely with the Police to identify and remove barriers to the timely acquisition of victim information.
13. Team Managers to ensure that Case Managers routinely attach intervention plans to the Asset Plus assessment.
14. Team Managers to ensure that all Intervention Plans are SMART.

Victims

15. Brent YJS to raise issues that limit the ability of the Police to contact victims in a timely fashion with the YJB, and at pan London strategic forums.
16. A Brent YJS Victims working group should be formed to explore local barriers and identify recommendations for making improvements.
17. Centralise all victims and restorative justice practice within one overarching Victims Policy.

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13.0 Evidence-based Practice and Innovation

13.1 The *HMIP 2023 Annual Report: inspections of youth justice services* promote an evidence-based approach to youth justice policy and practice. The approach is broken down into a framework that will underpin Brent YJS effective practice development in 2025-2028:

- **Adversity** – Young people who come into conflict with the law have experienced adversity on an individual, family, and community basis, and those from ethnic minority backgrounds experience disproportionate contact with the justice system.
- **Adolescent development** - Offending behaviour by young people should be viewed as part of adolescent development and considered in the context of the young person's social and psychological environment.
- **Universal Services** - Providing access to universal services – especially those focused on education and health – can prevent young people coming into conflict with the law.
- **Individualisation** - An individualised, rights-based and child-centred approach is key to preventing young people from getting into further conflict with the law.
- **Diversion** - When seeking to divert young people who have come into conflict with the law, it is important to take care with how and when to intervene, always ensuring to support positive outcomes.
- **Positive Relationships** - The development of positive relationships between young people and adults can help to prevent offending/engaging in further offending.
- **Detention** - The use of detention must be avoided, and where used, it must be adapted to children's needs, with a focus on equipping children with the health, education and life skills that ensure their safe return to their communities.
- **Continuing Support** - Education and employment opportunities are vital to ensuring young people avoid further offending and attention needs to be paid to managing the end of any intervention, providing continuity in support to the greatest extent possible.
- **Involving YP** - Young people's lived experiences are invaluable for policymakers seeking to understand the nature of youth offending, and their views are indispensable for developing effective and child-centred responses to offending behaviour.
- **Developing the Evidence base** - There is a continued need for consistent data collection, increased funded research, and improved relationships between policymakers and the academic community to promote progressive approaches to youth justice.

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13.2 Brent has learnt much from evidence-based practice and will seek to adopt any new approach that has the potential to improve outcomes for Brent residents. This will include monitoring research commissioned by the Youth Engagement Fund via their research toolkit which provides access to many promising approaches to addressing offending behaviour and preventing serious youth violence. Work with community organisations to identify alternative forms of engagement with young people will also be explored. This will include coproduction and participation methods, such as the use of podcasts and multimedia, that enable young people to learn and express their views about offending and its impact upon their communities.

14.0 Evaluation

14.1 HMIP 2023 Annual Report: inspections of youth justice services

In January 2024, the YJB published its annual statistics, looking at data from April 2022 to March 2023. These showed a small increase in the number of children who were first-time entrants (one per cent compared with the previous year), the first increase seen in the last 10 years. There was also an increase in the number of stop and searches (13 percent compared with the previous year). (HMIP 2023 Annual Report, p.10)

Evidence gathered online found that several factors consistently emerge as central to improving the life chances and outcomes of children. These include the importance of establishing positive, secure, consistent and trusting relationships between practitioners and children, as well as working collaboratively with children to identify goals, find solutions and build on their strengths, while working to address their needs. (HMIP 2023 Annual Report, p.10).

One of the most significant concerns HMIP identify in relation to youth justice during this period is the pressure on partnership resourcing and funding. The power of the partnership is critical for YJSs. HMIP assert that their very existence is predicated on partnership commitment and statutory responsibility. (HMIP 2023 Annual Report, p.10-23).

HMIP found that boards were most effective when board members were active participants who understood the distinct and diverse needs of YJS-involved children, could direct resources to meet these needs, and were influential advocates for them. Fundamental to boards' effectiveness was their ability to listen to the experiences of children and their parents or carers, and then use this information, both strategically and operationally, to develop and improve services. (HMIP 2023 Annual Report, p.19).

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Many YJSs have a stable workforce and have demonstrated that they are able to balance office and remote working, providing staff and children with flexibility in how services are delivered. (HMIP 2023 Annual Report, p.21).

HMIP typically found strength in the strategic and operational analysis of children's needs. The strongest performing areas had embedded a child-first and trauma-informed approach across the partnership. Interventions were delivered to a consistently high standard, which demonstrated the quality of partnership working. Children were able to access a range of services and support, and specific pathways for targeted, specialist and timely provision. Many YJSs are increasingly prioritising timely and appropriate neurodevelopmental pathways and recognising the importance of making sure YJS children can access speech, language and communication provision. (HMIP 2023 Annual Report, p.24).

Examples of effective transition arrangements with probation services and good links with courts and sentencers (HMIP 2023 Annual Report, p.25).

Interventions were often highlighted as a gap in provision for a variety of different reasons. Staff identified particular interventions that they lacked in their YJS, such as addiction support, restorative justice, domestic abuse, young fathers, speech and language therapy and prevention). Some said that the interventions they did have were old, out of date or did not meet current needs, and that there was a lack of innovation in what was available. (HMIP 2023 Annual Report, p.25).

HMIP found that reparation was often under used, or there were limited options available for children. Services for victims were not being adequately prioritised, and vacancies or gaps in specialist roles had led to significant delays in children receiving the services they required. They also found that a lack of review, monitoring or quality assurance sometimes meant partners were not proactively evaluating the impact and effectiveness of the resource or service they were providing. (HMIP 2023 Annual Report, p.25).

Some staff reported that they were unclear about what provision was available locally and that a mapping exercise was required, with clear pathways showing how to access those services. (HMIP 2023 Annual Report, p.26).

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HMIP found that only nine of the 20 YJSs had a seconded Probation Officer in post. (HMIP 2023 Annual Report, p.27).

HMIP expect timely and relevant information to be available and appropriate facilities to be in place to support a high-quality, personalised and responsive approach for all children. These areas had detailed policies, procedures and guidance documents, where diversity was considered throughout, and which were evidenced-based and regularly reviewed and evaluated. HMIP found strong evidence that quality assurance drove performance and led to high-quality services. (HMIP 2023 Annual Report, p.28).

Several staff mentioned the various issues around the geography of their area, saying that services available in one part of their area were not available in another, creating a postcode lottery for the children. (HMIP 2023 Annual Report, p.29).

Other notable findings included:

- The majority of children were aged 17 or older (40 per cent), followed by children aged 15 to 17 (34 per cent).
- The majority were male (91 per cent, an increase from 86 per cent the previous year).
- The majority were of white heritage (61 per cent), a decrease from last year (75 per cent); 36 per cent were of Black and minority ethnic heritage, an increase from last year (23 per cent). Two per cent were recorded as 'other groups' and two per cent were not clearly recorded.
- In 50 per cent of the cases HMIP inspected, the children had identified disabilities. Of those, the majority had learning difficulties (75 children), followed by a cognitive disability (39 children) and then mental illness (24 children).
- The majority of children subject to court orders had received referral orders (77 per cent), followed by youth rehabilitation orders (23 per cent).
- Violent offences accounted for 55 per cent of the cases inspected, followed by robbery (nine per cent) and drugs and motoring offences (five per cent). Sexual offences (contact and non-contact) accounted for five per cent and burglary for three per cent of the cases inspected.
- In 76 cases a knife was feature in the current/inspected offence. In 59 cases a knife had been a feature in previous offences.

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- In 24 per cent of the inspected cases, children had been cared for by the local authority within the inspected period: 14 per cent of these children lived in the area covered by the YJS and 10 were living out of the YJS area.
- In 32 per cent of cases, the children did not have their religion recorded.

15.0 YJS Partnership Budget 2025/26

Brent uses Youth Justice Board funding exclusively for the delivery of a range and variety of youth justice provision, aligned to effective practice and the achievement of the youth justice core outcomes.

£105,347 reduction

Agency	Cash	In-Kind Contributions	Partnership Funding	Total
Brent Council	£621,258	-	-	£621,258
Police	-	£90,000	-	£90,000
National Probation	£5,000	£50,000	-	£55,000
Health Service	-	£120,000	-	£120,000
MOPAC	£45,000	-	-	£45,000
Youth Justice Board	£588,339	-	-	£588,339
Other Dedicated Schools Grant (DSG)	£114,000			£114,000
Other - Turnaround (MoJ)	£100,266			£100,266
Total	£1,473,863	£260,000	£0	£1,733,863

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Sign off, submission and approval



Signed

Palvinder Kudhail

**Chair of the Brent Youth Justice Service Management
Board**

Date: 15/06/2025

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Appendix 1 YJS Management Board Membership

Name	Job Title	Sector / Partnership Area
Palvinder Kudhail	Director – Early Help and Social Care	CYPCD Brent Council
Serita Kwofie	Head of Service Early Help	CYPCD Brent Council
Simon Egbor	Head of Community Safety	Community Safety and Public Protection
Vivien Dean	Head Teacher of Brent River College	Education
Alexandra Johnson	Head of Probation Delivery Unit	Probation Service
Sarah Nyandoro	Head of Joint Commissioning Brent ICB	CCG – Health
Andy Brown	Head of Substance Misuse	Public Health
Roxanna Glennon	Head of Inclusion	CYPCD Brent Council
DI Tony Killeen	Detective Inspector Offender Management Northwest Borough Command Unit Metropolitan Police	Metropolitan Police
Sgt Karl Jameson:	YJS Supervisor – NW BCU	Metropolitan Police
Kelli Eboji	Head of Service Looked After Children and Permanency	CYPCD Brent Council
Stephen Gordon	Head of Service Localities	CYPCD Brent Council
Emmanouela Kladouchou	Psychology Lead & Enhanced Treatment Team Lead. Principal Clinical & Forensic Psychologist	Brent and Kensington and Chelsea CAMHS
Rachel Summerfield	Magistrate – Chair of the Youth Bench	Willesden Magistrates Court

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Anna Alexandrou	Early Help, Panel Officer (minutes)	CYPCD Brent Council
James Salter	Youth and Youth Justice Manager	CYPCD Brent Council
Catherine Williams-Baffoe	Deputy Youth Justice Manager	CYPCD Brent Council
Antoinette Morgan	Quality Assurance and Practice Development Manager	CYPCD Brent Council
Maxine Willetts	Chief Executive Young Brent Foundation	Young Brent Foundation – Voluntary Sector
Sanjay Shah	Performance and Management Information Officer	CYPCD Brent Council
Jessica Manning / Bhavita Gohel	Oversight Manager	Youth Justice Board
Divine Bremathas	Programme Mental Health and Wellbeing Officer	Brent Integrated Care Partnership Brent Council

Dates of the YJS Management Board Meetings

Meetings 2025/26
10 April 2025
24 July 2025
23 October 2025
22 January 2026

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Appendix 2: Staff Structure

The Youth and Youth Justice Manager reports to the Head of Early Help

YJS Staffing Structure 2023 – 24		
Post	FTE	Funding Source
Youth & Youth Justice Manager	1	YJB/Brent Council
Deputy Youth Justice Manager	1	YJB/Brent Council
Quality Assurance and Practice Development Manager	1	YJB/Brent Council
Team Managers	4	YJB/Brent Council
Restorative Justice Lead	1	YJB/Brent Council
Case Managers	10	YJB/Brent Council
Data Quality Officer	1	YJB/Brent Council
Youth Participation Worker	1	YJB/Brent Council
Early Intervention Officer – Triage	1	MOPAC
Reparations Worker	0.5	YJB/Brent Council
Total	21.5	

The service wide YJS staff group of 21.5 FTE is supplemented by the following 7.6 FTE secondments and co-location arrangements:

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Post	FTE
Police Officer	2.0
Seconded Probation Officer	0.6
Prospects Employment Advisor	2
CAMHS Practitioner	1
YJLD Liaison and Diversion (CNWL)	1
VIA Substance Misuse	1
7.6	

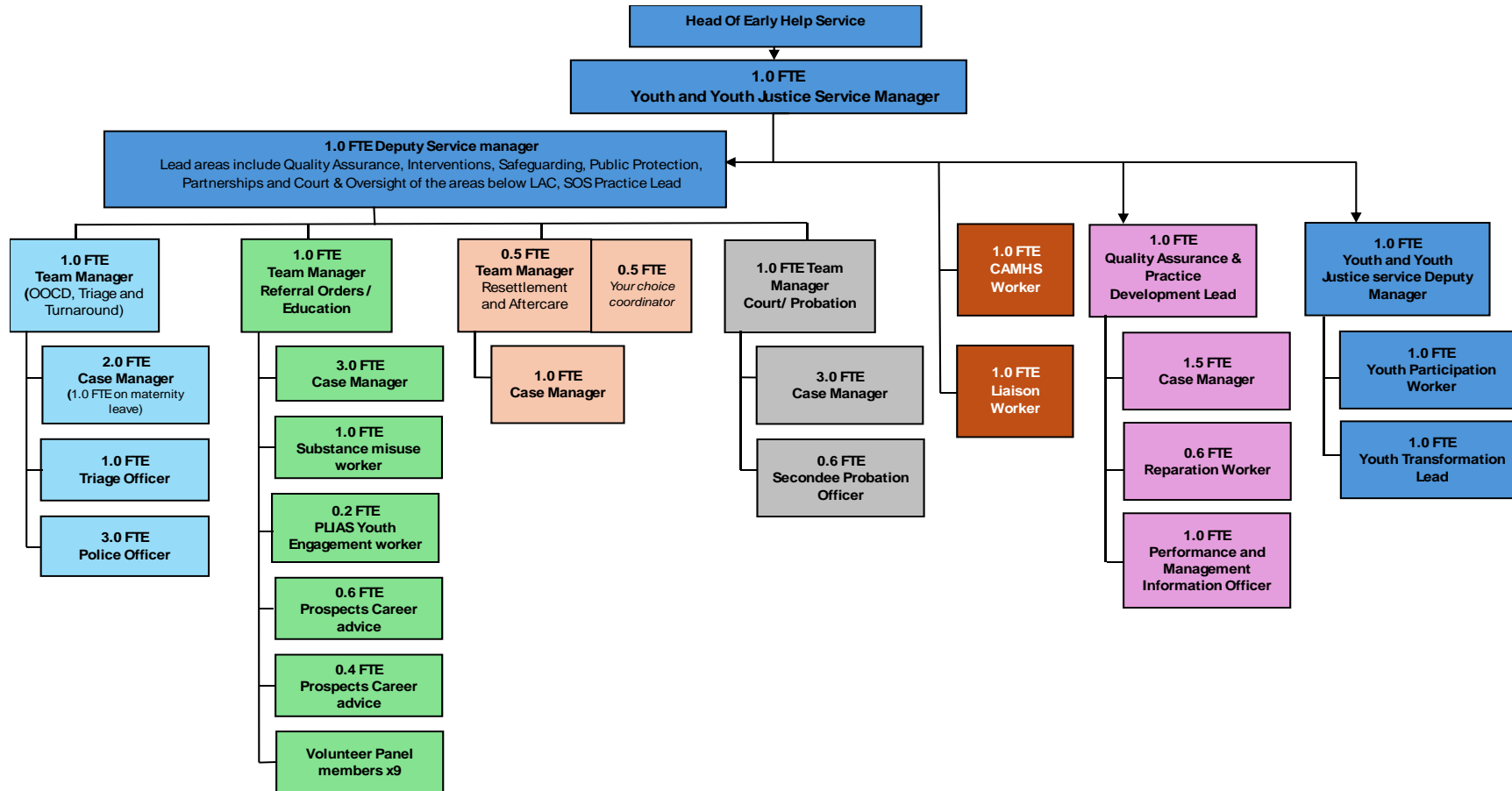
Staff by gender and ethnicity (There are no staff currently registered as disabled)

Gender	Total
Female	23
Male	7
Total	30

Ethnicity	Total
BAME	23
White	7
Prefer not to say	0
Total	30

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Brent Youth Justice Service Staff Structure 2025/26



Pre-Court	First Tier, Community and Custody Disposals					
First-time Entrants, Early Interventions, Pre-court Disposals, Data Quality, Turnaround, Engage	Referral Order Panels, Education, Employment and Training; Volunteer Panel members	Gangs, Your Choice, Contextual Safeguarding, No Knives Better Lives, Resettlement and Aftercare	Court, Custody, Bail, and Remand, Reoffending, Intensive Supervision & Surveillance, National Referral Mechanism, Probation, Transitions		Quality Assurance and Practice Development, Restorative Justice, Reparation, Group work & Interventions, Participation & YJS	Youth Strategy, Youth Engagement, FWC Interventions

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	Cabinet 13 October 2025
	Report from the Corporate Director of Children, Young People and Community Development
	Lead Member - Cabinet for Children, Young People & Schools (Councillor Gwen Grahl)
Youth Facilities Capital Investment Programme	

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:	None
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Janasugani Vetharuban, Graduate Trainee 020 8937 1959 Email: Janasugani.Vetharuban@brent.gov.uk Neil Martin, Head of Capital Delivery 020 8937 4203 Neil.Martin@brent.gov.uk Serita Kwofie, Head of Early Help 020 8937 1747 Email: serita.kwofie@brent.gov.uk

1.0 Executive Summary

- 1.1 This report provides Cabinet with a summary of the approach to establishing a programme of capital investment in youth facilities across the borough, in partnership with youth sector providers.
- 1.2 The report recommends the approval of funding five projects using the Strategic Community Infrastructure Levy (SCIL). The five projects that were shortlisted by a youth panel, offer enhanced youth facilities across the borough and are in or serve the boroughs growth areas and areas of deprivation.

2.0 Recommendation(s)

That Cabinet:

- 2.1 Approves the youth facilities capital investment programme as set out in this report.
- 2.2 Approves the projects for the organisations as set out in paragraph 3.2.8 and use of £4m of Strategic Community Infrastructure Levy to fund the programme as detailed in table 2, paragraph 5.1.

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 This report details an exciting proposal to deliver a substantial investment of Strategic Infrastructure Levy to five deeply impactful youth organisations in Brent.
- 3.1.2 Our youth sector in Brent does crucial work with young people, delivering recreation, sport and activities that help young people thrive. This has been a competitive bidding process, in which young people have been given a voice in choosing how the funding is awarded.
- 3.1.3 In congratulating everyone involved in this initiative I look forward to seeing how this investment will make a difference to young people in communities across Brent.
- 3.1.4 The programme has identified funding for local organisations to enhance youth facilities in line with a consistent approach to support the local voluntary and community sector.
- 3.1.5 This programme aims to fund structural changes and improvements to premises used by youth organisations to enable better access and an increase in facilities and activities for young people across the borough.
- 3.1.6 This programme will provide much-needed improved facilities that support both the immediate needs of young people and the long-term goals of community development. By fostering a sense of ownership and empowerment among young people, the project will encourage local leadership and active participation in the borough's ongoing regeneration. This in turn may also help young people's overall outcomes to improve.
- 3.1.7 This directly aligns with the refreshed Brent Youth Strategy 2025-2028, approved by Cabinet in March 2025. The aim of the strategy is "to empower every young person in Brent with the skills, opportunities and support needed to lead healthy, fulfilling lives and to become engaged, responsible, and inspired members of society." This initiative will support in meeting the need, well-articulated by the local voluntary youth sector in the borough, to have suitable spaces where youth organisations can deliver vital youth and community provision.
- 3.1.8 The programme aligns with the Brent Borough Plan 2023 – 2027 outcomes:

1) The Best Start in Life:

The identified works will contribute to providing an improved environment that will enable young people to enjoy and achieve in and outside of formal education.

2) Thriving Communities:

The identified works will contribute to building services around our residents and their needs by providing a good quality development environment. This programme also aligns with the Council's values as it encourages proactive collaboration with Brent communities and leading inclusive projects.

3.2 Background

- 3.2.1 In January 2021 Cabinet approved the creation of an Onside Youth Zone in Brent with a significant capital contribution, subject to a number of conditions, the most significant being obtaining a suitable site. Unfortunately, this project could not proceed as proposed due to challenges in finding a suitable site option.
- 3.2.2 Officers therefore sought an alternative method to deliver youth facility enhancements with the committed capital. As the Council does not operate its own youth facilities, it undertook engagement with established, local youth facility providers with the intention of enhancing existing facilities to seek to increase youth participation and a greater choice/range of youth provision.
- 3.2.3 An initial expression of interest period was run to identify potential providers where capital investment could seek to increase youth participation. From this expression of interest, 11 projects from across Brent were shortlisted.
- 3.2.4 These 11 potential projects had feasibility studies undertaken, involving input and feedback from the youth facility provider. Examples of the proposed enhancement works included multi-use games areas, teaching kitchens, extension of existing facilities and amenities, and reconfiguration of currently unusable areas for multi-purpose youth provision.
- 3.2.5 A detailed scoring criteria was developed by officers that included points such as the length of existing lease on the building, location, current condition and anticipated higher levels of participation from disadvantaged and hard to reach young people.
- 3.2.6 Organisations then presented to a Youth Panel during a selection event. The Youth Panel was formed consisting of young people from Brent Youth Parliament, Youth Justice Service, Brent Care Journeys 2.0 and the voluntary and community sector, ranging from 14 to 20 years old. Members of the panel lived in different areas across the borough. Ten organisations ultimately attended the Civic Centre to present their projects to the Youth Panel at a *Youth Facilities Capital Investment Programme Selection Event*.

3.2.7 The Youth Panel were provided with materials in advance that included a summary of each organisation's values, aims and their project overview, which was summarised from the feasibility reports. This formed the basis of the scoring criteria, along with location, accessibility of the project and the expected benefit to the local community. Once all presentations were complete, a moderation session was held around the table with the Youth Panel to discuss their preferred projects and scoring rationale.

3.2.8 Following this session, the group recommended that five projects should be considered for the programme. These recommendations were further assessed by officers for suitability against the relevant criteria and are now being recommended for Cabinet approval:

- **Cricklewood Boxing Club, The Boxing Gym (Dollis Hill Ward)** - The current facility, situated in a four-story building located on the edge of a large residential district with nearby schools and community services, has outgrown its capacity. As a result, the club is currently forced to turn people away due to lack of space. This expansion proposal seeks to ensure the club can continue to serve the local community effectively. By upgrading essential facilities such as the kitchen, to provide space for teaching healthy eating, increasing bathroom and changing facilities to provide a more comfortable, hygienic, and accessible environment for young people, improving the connectivity at first floor level between the boxing ring and the gym space, and providing additional usable space where garages are currently located.
- **Jason Roberts Foundation, Gym and Sports Hall flooring (Stonebridge Ward)** – This project aims to upgrade the foundation's facility in Stonebridge to better serve its diverse and growing community of young people. By providing a safe, weather-proof and accessible environment, the foundation will be better equipped to serve its mission: creating inclusive spaces that foster healthy relationships, build life skills, and support the personal growth of young people. The Youth Panel were impressed by the organisation hosting additional activities to those usually provided, with one young person stating, *“it was unique” ... “more than just football, sports that I have never seen before in London – American Football.”* One of the female members of the group stated *“girls-only football was great”* and it *“felt like the project is safe”*. The feedback included positive comments about a *“good sense of community”*, with *“good outreach and good positive opportunities for growing children and young people”*. While The Pavilion venue where Jason Roberts Foundation deliver many of their activities is adjacent to SCIL growth areas, it was unanimously agreed by the Youth Panel that the organisation had a wide reach to young people who reside in neighbouring growth areas and would therefore be SCIL eligible. Jason Roberts Foundation were able to support this with their own data which was provided on request.
- **The OK Club, Sports Hall refurbishment (Kilburn Ward)** – The proposed project will involve a full redesign and refurbishment of key areas within the building to create more inclusive and sustainable spaces. There was,

positive feedback from the Youth Panel about the longevity and inclusivity of the organisation and activities – *“they own the building which is good”* and *“it is open to all”* and supports *“a decent amount of kids.”* This in turn means the club will be able to better achieve its goals of meeting the growing needs of young people, improving access and enhancing the safety and well-being of young people in the area.

- Roundwood School and Community Centre with Sport at the Heart (Roundwood Ward)** - The building is spread over three levels, offering a media suite, performance area, outdoor multi-use games area, IT suite, dance studio, art room, café, and flexible meeting spaces. While the existing facilities serve as an essential resource for young people, this project will focus on maximizing the space and improving its functionality to inspire creativity, promote physical activity, and support the well-being of students and staff alike. Members of the Youth Panel wrote in their comments that this project had a *“clear vision”* and *“would have a big impact.”* They felt that this was in *“an area that is needed, well known, and the impact is already big, and this would increase it.”* The organisation, venue and project were described as *“youth centred”, “very accessible”* and *“all ages, safe area”*. The young people understood the aims clearly, appreciated the style of presentation, and identified that *“they [Beckmead and Sport at the Heart] want to help continue providing activities and hobbies for all children and young people including [those with] SEND.”* They were also impressed by the *“offer of a diverse range of activities for all age groups, all needs and all different groups on the weekends, with SEND specific activities.”*
- Young Brent Foundation, The Anchor Youth Hub (Roundwood Ward)** – support the continuing establishment of the new facility, whose tender was awarded in June 2024, with capital investment. The facility will provide young people with access to a wide range of recreational, educational, and wellness opportunities, fostering a safe and supportive environment for personal growth and development. The Youth Panel fed back that *“the organisation is well known in the borough and are aware of the context of the area.”* There was positive regard towards the organisation, with one young person stating that *“They seemed genuine – they showed that they know the situations with different areas and showed evidence of someone with lived experience changing.”* There was also an appreciation for how they demonstrated that *“they know how to keep young people from trouble.”* The project and venue were described as *“accessible”* and *“seems like an organised project”* with *“good risk assessment”* and it was identified that *“there are no gyms in the area so this project fills that.”*

3.2.9 The objectives of this programme are to fund structural changes and improvements to premises used by youth organisations to enable better access to facilities and activities for young people. It will also demonstrate to communities the benefits that new development can bring, through the provision of key infrastructure projects, place-making and local improvements.

3.2.10 This programme aligns with the Strategic Outcomes Planning Model (SOPM) which includes various infrastructure strategies. It is currently being designed

to provide the strategic evidence base and framework that will underpin capital investment across Brent in sport, leisure, and community infrastructure which in turn will ensure that decisions are driven by need, demand, and identified outcomes. This youth facilities enhancement programme is integrated into this process to strengthen strategic alignment, reduce duplication, maximise the Council's investment and help unlock additional funding opportunities.

Alternative options

- 3.2.11 Officers considered two other options. Firstly, officers reviewed a smaller programme with fewer projects. Although this would have reduced capital expenditure, it was felt that the location and potential scale of the programme should be maximised to meet the aims of the Brent Youth Strategy. A second option of not delivering the programme was discounted as capital investment had been made available as part of the OYZ Cabinet decision in 2021 and this would not have met the increasing demand for youth facility spaces and the aims of the Youth Strategy.

Timescales

- 3.2.12 Officers are proposing the following indicative timeline for the programme. It should be noted that the below is for the entire programme and officers will seek to deliver some of the projects / enhancements more quickly where possible.

Key Milestones	Estimated Date
Cabinet Approval	Oct - 2025
Consultant Procurement	Nov 2025 – Dec 2025
Design and Surveys	Jan 2026 – Oct 2026
Planning	Oct 2026 – Jan 2027
Contractor Procurement	Jan 2027 – March 2027
Works	April 2027 – March 2028

Table 1 – Youth facilities enhancement programme milestone plan

- 3.2.13 Some of the youth providers do not own their buildings, therefore it is necessary to gain approval from the relevant landlords before progression of the projects.
- 3.2.14 Since the projects involve community organisations, it will be necessary to ensure that each project is supported by robust Community Use Agreements (as a condition of funding, planning etc.) to safeguard access and maximise social value.

Use of Strategic Community Infrastructure Levy (SCIL) Funding

- 3.2.15 The purpose of SCIL is to help the Council to deliver the infrastructure needed to support development within the Borough. The application of Strategic CIL can be used to demonstrate to communities the benefits that new development

can bring, through the provision of key infrastructure projects, place-making and local improvements. This proposal aims to fund structural changes and improvements to premises used by youth organisations to enable better access and an increase in facilities and activities for young people in the London Borough of Brent

3.2.16 In the Council's Local Plan Policy BS11: Social Infrastructure and Community Facilities identifies that high levels of social and economic disadvantage remain in Brent and that the diverse population of the borough requires a wider range of cultural and community facilities. In terms of health, it states that 38% of children aged 10-11 are classified as overweight or obese and 33% of the population are inactive, which is amongst the highest in England. The Council's Indoor Sports and Leisure Needs Assessment identified that provision is significantly below community needs. Providing recreational space constitutes an essential element in creating a sustainable, positive community. It will assist in supporting young people to meet the aims of the Brent Youth Strategy 2025-8 – to take part, enjoy themselves, feel good and stay safe.

3.2.17 These projects are located in and/or serve growth areas such as Staples Corner, South Kilburn and Church End. There is significant growth in these areas as well as being some of the most deprived areas in the borough so it is vital the Council invests in facilities and improvements to meet population needs.

4.0 Stakeholder and ward member consultation and engagement

4.1 Officers have engaged with youth organisations across the borough to seek their input on proposals as well as involved the shortlisted projects in the feasibility reports to understand their proposals in more detail.

4.2 Officers also involved Brent's young people in the process via the panel process that considered presentations and recommended which projects to take forward. Officers will continue to engage with young people as the projects progress through the design and construction phases.

4.3 The Cabinet Member for Children, Young People and Schools as well as relevant ward members will be updated on progress of the schemes and milestones such as planning determination, construction start dates and any significant achievements including topping out and practical completion.

5.0 Financial Considerations

5.1 The project budget is based on the feasibility reports that incorporate the youth organisations expression of interest applications. Due to the early nature of these discussions and the current design stage, officers are proposing a programme contingency of 20%:

Project Name	Cost (£)
Cricklewood Boxing Club - The Boxing Gym	826k
Jason Roberts Foundation – Gym and Sports Hall flooring	1.06m
Roundwood School and Community Centre x Sport at the Heart	390k
The OK Club – Sports Hall refurbishment	550k
Young Brent Foundation – The Anchor Youth Hub	500k
Programme Contingency	700k
Total	4m

Table 2 – Cost of each youth facility enhancement project

- 5.2 Because these organisations are relatively small, they have limited capacity to undertake major capital projects. Therefore, the intention is Brent project manages the works on their behalf. This creates a risk that Brent is liable for overspends or changes in project specifications. Agreements with these organisations need to be clear that Brent's maximum budgets are fixed and they will need to cover any shortfalls or changes in project specifications.
- 5.3 Organisations can also apply for alternative funding sources to supplement the Council's contribution. Should organisations successfully apply for additional capital funds officers will seek to investigate these and any other funding streams to potentially reduce the SCIL request for this programme. It is however recommended to proceed with SCIL funding for the whole programme to ensure it proceeds in line with the projected timescale.
- 5.4 As at the end of August 2025, Brent had £156.9m SCIL with £80m committed and £72.9m allocated to pipeline schemes. Therefore, there is £4m SCIL available for this programme and the Council's Infrastructure Officer Working Group has approved this as an appropriate use of the SCIL funding.
- 5.5 Officers are working with Brent's VAT advisers to structure the arrangement in the most tax advantageous way, recovering the tax if possible. If the tax is not recoverable, the projects will need to be value engineered to ensure they remain within the overall budget.
- 5.6 Finance have carried out financial assessments of the recipient organisations in a similar way to those for prospective suppliers to understand the risks of Brent funding schemes at centres at risk of not being able to deliver the services as agreed. Where risks are identified officers will put in place appropriate mitigations to ensure the facility continues to operate should any of the organisations fail.

6.0 Legal Considerations

- 6.1 Pursuant to section 507b of the Education Act 1996 (as amended by Education and Inspections Act 2006) the Council is to secure, so far as reasonably practicable, sufficient educational and recreational activities which are for the improvement of young people's well-being, personal and social development, and sufficient facilities for such activities for young people aged 13 – 19, (or up to 25 for young people with additional needs). In addition, the Education and Skills Act 2008 requires the Council to make available to young persons and relevant young adults for whom it is responsible such services as it considers

appropriate to encourage, enable or assist the effective participation of those persons in education or training.

- 6.2 The proposed use of the Strategic Community Infrastructure Levy for funding of the improvement works of the youth facilities, the Youth Provision Programme is subject to the requirements of the Subsidy Control Act 2022. The Subsidy Control Act 2022 which replaced State Aid controls is designed to ensure the proper functioning of the UK's internal market and ensure that the UK continues to satisfy its international commitments to its trading partners in respect of subsidies.
- 6.3 Under the Subsidy Control Act 2022, public authorities are allowed to award subsidies if it could demonstrate that the purpose respects each of the seven Subsidy Control Principles set out at Schedule 1 of the Act ('the Principles'). The Principles are that the subsidy award must be for a Common interest; it is proportionate and necessary; it is designed to change economic behaviour of beneficiary; the costs would be funded anyway; it is the least distortive means of achieving policy objective; it is for competition and investment within the United Kingdom; and beneficial effects outweigh negative effects. Based on the information provided in the body of this report, the subsidy is not subject to notification to the Competition and Markets Authority under Section 52 of the Subsidy Control Act 2022 but is subject to the transparency obligations under Section 6 (which places a duty upon public authorities to post information on to the Transparency Database within three months of making an award/modifying a subsidy or adopting a subsidy scheme). Subject to the above, the funding may be awarded for improvement works at the youth facilities under the Act as measure are consistent with each of the seven Subsidy Control Principles set out at Schedule 1 of the Act.
- 6.4 It is expected that the Director, Property and Assets will agree the procurement and award of contracts for this programme that fall within the definition of Very Low Value, Low Value Contracts and Medium Value Contracts under Brent's Standing Orders. Under Part 3 of the Constitution paragraph 9.5, approval to procure and award Very Low Value Contracts, Low Value Contracts and Medium Value Contracts is delegated to the relevant Corporate Director, and Directors have similar powers under paragraph 9.7 of Part 3 of the Constitution to approve the procurement and award of such contracts falling within their area of responsibility. The Director of Property and Assets therefore has the authority to approve the procurement and award of contracts in respect of the projects.
- 6.5 Some of the proposed projects are in buildings the council does not own. Therefore, legal agreements to conduct works on these properties will need to be in place with the respective landlords.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 In March 2025, Cabinet approved the Youth strategy 2025-28. This report addresses Equity, Diversity and Inclusion considerations under the Equality Act 2010 to ensure fair access and inclusivity for all children and young people in Brent.

8.0 Climate Change and Environmental Considerations

- 8.1 The Climate Change Strategy commits the Council to include the need to set standards that support the Council's Zero Carbon ambitions. These will be factored into schemes designs where possible including but not limited to use of solar PV and enhancements to building fabric insulation levels.

9.0 Human Resources/Property Considerations (if appropriate)

- 9.1 Some of the proposed projects are in buildings the Council does not own. Therefore, legal agreements to conduct works on these properties will need to be in place with the respective landlords.
- 9.2 There is no impact on Council staff as the consultancy services and works contracts will be delivered by external organisations on the Council's behalf.

10.0 Communication Considerations

- 10.1 Young people, local residents and community groups will be kept up to date on progress of the projects through a communication plan drafted and agreed with the youth facility provider.


Related documents for reference:

[Brent Youth Strategy 2025-2028](#) Cabinet report 10 March 2025

Report sign off:

Nigel Chapman

Corporate Director Children, Young People and
Community Development

	Cabinet 13 October 2025
	Report from the Corporate Director of Residents & Housing Services
	Lead Member - Cabinet Member for Housing (Councillor Fleur Donnelly-Jackson)
Additional HMO Licensing Scheme 2026	

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>Nine:</p> <p>Appendix 1: Consultation Report</p> <p>Appendix 2: Council response to comments received during public consultation</p> <p>Appendix 3: Consultation Evidence Pack</p> <p>Appendix 4: Housing Conditions and Stressors Report, Metastreet 2024</p> <p>Appendix 5: Additional HMO Licensing Designation</p> <p>Appendix 6: Licensing scheme objectives</p> <p>Appendix 7: Additional HMO Licence Conditions</p> <p>Appendix 8: Schedule of Fees</p> <p>Appendix 9: Equality Analysis</p>
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	<p>Spencer Randolph, Director of Housing Services 020 8937 2546 Email: Spencer.Randolph@brent.gov.uk</p> <p>Triza Handa, Head of Private Housing Services 020 8937 4037 Email: Triza.Handa@brent.gov.uk</p>

1.0 Executive Summary

- 1.1. In February 2020, the Council renewed a boroughwide additional HMO licensing scheme, which was first introduced in 2017, to ensure safety standards for tenants living in smaller houses in multiple occupation (HMOs)

that are occupied by three or four people living in two or more households. This scheme ended on 31 January 2025.

- 1.2. On 19 February 2025 the Cabinet Member for Housing and Residents Services agreed the decision to carry out a statutory consultation seeking stakeholders' views on proposals to introduce a new boroughwide additional HMO licensing scheme. The decision was informed by an evidence-based report and the relevant Government guidance on the introduction of discretionary licensing schemes.
- 1.3. The consultation with landlords, tenants, residents, stakeholders and other interested parties started on the 10 March 2025 and ran for 13 weeks, concluding on 10 June 2025. The council used digital and print media to advertise the consultation, as well as in-person methods.
- 1.4. The main feedback method was via an online or paper questionnaire. The Council also hosted several public meetings with landlords, tenants, residents, and landlord groups. 381 individuals or organisations completed the online or postal questionnaire. Qualitative feedback was received at deliberative meetings with interested groups and from written responses from landlord representatives. In summary the results were very similar to previous consultation exercises the Council has undertaken on private sector licensing, with residents and business being in favour of the schemes and landlords less in favour or not at all. Of those who returned the questionnaire 58% were residents or local businesses, 40% were landlords or agents and 2% were other stakeholders.
- 1.5. The consultation looked at the level of support for introducing additional HMO licensing, and looked at views on the proposed licence conditions, fees, and the respondents' perceptions on the issues affecting HMOs, such as poor property conditions and anti-social behaviour (ASB) in the borough.
- 1.6. The findings of the consultation exercise are provided in the consultation report (**Appendix 1**).
- 1.7. This report makes recommendations in relation to designating a new additional HMO licensing scheme to the whole area of the borough with effect **from 02 February 2026** or at a later date in accordance with the statutory time required for the scheme to come into force.

2.0 Recommendation(s)

For the reasons set out in the report and its appendices, Cabinet is recommended to:

- 2.1 Note the outcome of the consultation process detailed in the Consultation Report (**Appendix 1**), the representations received and the Council's consideration and response to these representations (**Appendix 2**).

- 2.2 Note that the document to support undertaking this public consultation (consultation evidence pack) (**Appendix 3**) and Housing Conditions and Stressors Report (**Appendix 4**) highlight the scale of problems relating to poorly managed HMOs in the private rented sector, identifies the objectives that the proposed additional HMO licensing scheme would help the Council achieve and alternatives to licensing which have been considered.
- 2.3 Upon consideration of the matters at (2.1) and (2.2) above and using its powers under s.56 Housing Act 2004, agree to designate a new Additional Licensing area of the whole of the London Borough of Brent from 02 February 2026 or at a later date in accordance with the statutory time required for the scheme to come into force as delineated and edged red on the map in the draft designation in **Appendix 5**
- 2.4 Authorise the Corporate Director of Resident and Housing Services, subject to statutory notifications, to determine an alternative start date for accepting applications for selective licensing, if necessary.
- 2.5 Agree to the proposed licensing scheme objectives as set out in **Appendix 6**.
- 2.6 Agree the proposed HMO licensing conditions that would accompany any granted HMO licence as set out in **Appendix 7**.
- 2.7 Agree the proposed fee structure for licence applications made under the additional HMO licensing scheme at **Appendix 8**.
- 2.8 Agree to apply the same proposed fee structure to mandatory HMO licenses applications. For mandatory licensing, there's no statutory duty to consult on fees.
- 2.9 Consider and have regard to the results of the Equality Analysis at **Appendix 9**.
- 2.10 Agree to delegate authority to the Director of Housing Services to issue the required statutory notifications in relation to the designation and, in consultation with the Cabinet Member, to ensure compliance in all respects with all relevant procedures and formalities applicable to authorisation of the scheme; to keep the proposed scheme under review during the designation lifetime and agree any changes to the proposed implementation and delivery, including administration, fees and conditions as necessary for the effective administration of the scheme, and give all necessary statutory notifications.
- 2.11 Agree to delegate authority to the Director of Housing Services to approve the carry forward of any surplus or deficits to the established ring-fenced trading account as and when necessary, subject to consultation with the Chief Finance Officer.

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 Brent is consistent with the rest of London in that it has a shortage of affordable housing, with house prices remaining out of reach for many. The demand for social housing far exceeds supply. As a result, privately rented accommodation has become the only viable housing option for many Brent residents. Currently, 36% of Brent's housing stock is in the PRS and this is expected to continue to rise in the future.
- 3.1.2 HMOs are an integral part of the housing supply and meet the demands of a diverse range of residents, including those who are vulnerable, disabled, or living on low incomes. Unfortunately, housing conditions in HMOs are often among the worst in the PRS.
- 3.1.3 Tackling poor housing conditions and improving the quality of the private rented sector is a key priority within the Council's Borough Plan. Property licensing is a way of driving up standards and ensuring safer and better managed HMO accommodation. Like all councils across the country, Brent operates a national mandatory HMO licensing scheme for larger HMOs and introduced a boroughwide additional HMO licensing scheme on 1 February 2020 for smaller HMOs occupied by three or four people. This scheme ended on 31 January 2025.
- 3.1.4 The previous additional HMO licensing scheme significantly improved standards and management practices across many HMOs in the borough. However, evidence shows that there is a significant number of properties that remain substandard and potentially dangerous. These HMOs pose a risk to the health, safety, and wellbeing of tenants, cause problems for neighbours, and demand substantial intervention from council enforcement services. It is crucial that the Council uses all available tools to improve conditions for tenants in this sector. Licensing is a key tool in this effort.
- 3.1.5 The below report presents the evidence and responses following a statutory consultation exercise on proposals to introduce a further additional HMO licensing scheme and demonstrates how the scheme aligns with the Council's wider programmes to tackle housing need, increase sustainability, improve property standards and reduce antisocial behaviour (ASB).
- 3.1.6 The Borough Plan includes two priorities specific to Housing, these are:
- Strategic Priority 1 – Prosperity and Stability in Brent
 - Strategic Priority 2 – A Cleaner, Greener Future
- 3.1.7 The proposals support these two priorities and outline the Council's strategy to ensure the private housing sector in Brent is safe, stable, and accessible. Through the additional HMO licensing scheme housing quality can be improved, safety standards enforced, and overcrowding and poor management addressed to ensure all HMOs are fit for habitation. By incorporating

environmental standards, such as energy efficiency requirements, proper waste management, and the use of sustainable practices in HMOs, the scheme contributes to the delivery of a cleaner, greener Brent.

- 3.1.8 It is acknowledged whilst Housing is not specified in the remaining priorities set out in the borough plan, a safe and secure place to call home is a foundation for Thriving Communities, The Best Start in Life and a Healthier Brent.
- 3.1.9 The Additional HMO licensing proposals also align with the Council's wider programmes to tackle housing need, increase sustainability, improve property standards and reduce ASB. The renewal of the Additional HMO licensing scheme will help the council to deliver a number of priorities detailed in key strategies including the following:
- Private Sector Housing Strategy
 - Homelessness and Rough Sleeping Strategy
 - Climate and Ecological Emergency Strategy
 - Waste Management Policy
 - Safer Brent Community Safety Strategy
 - HMO Planning Policy (Article 4 Direction)

3.2 Background

- 3.2.1 In addition to the national mandatory HMO licensing scheme, the Housing Act 2004 enables local authorities to designate areas as subject to discretionary licensing. There are two types of discretionary licensing schemes: Additional licensing of HMO's and Selective licensing of private rented properties that fall outside the scope of HMO licensing.
- 3.2.2 On 01 February 2020, the Council implemented a boroughwide additional HMO licensing scheme to ensure safety standards for tenants living in small houses in multiple occupation (HMO). This required eligible HMOs to be licensed with the Council. Property licences require the licence holder to comply with conditions relating to the letting and management of the property. Such discretionary property licensing schemes can only last for a maximum of five years and Brent's scheme ended on 31 January 2025.
- 3.2.3 HMOs inherently present a higher risk to occupants, particularly when properties are poorly managed. Licensing serves as a tool to raise standards and ensure safer, better-managed HMO accommodation. It allows the Council to take a proactive approach to enforcement and inspections, rather than relying on residents to report issues. This is especially important for HMO tenants, who are often more vulnerable and may hesitate to report disrepair or poor management practices due to the fear of eviction. By licensing all HMO properties, a level playing field is created where tenants can trust that landlords are maintaining property standards. If landlords fail to do so, the Council can take necessary enforcement actions to ensure compliance.
- 3.2.4 Before the introduction of the additional HMO licensing scheme, when a property or management issue arose in an HMO not covered by the mandatory HMO licensing scheme, officers would spend considerable time

identifying the responsible party before addressing the problem. The additional HMO licensing scheme has established clear lines of communication with the responsible parties and set enforceable standards. This has improved access to landlords, resulting in quicker resolutions of complaints and landlords taking action to improve the quality of their HMOs and manage them more effectively.

- 3.2.5 The Council's commitment to enforcement and regulation has led to significant improvements, raising the standards of poor-quality accommodation in HMOs and protecting renters from illegal practices in the borough. However, evidence shows that there is a significant number of properties that remain substandard and potentially dangerous.
- 3.2.6 On 19 February 2025 the Cabinet Member for Housing and Residents Services agreed the decision to carry out a statutory consultation seeking stakeholders' views on proposals to introduce a new boroughwide additional HMO licensing scheme.
- 3.2.7 The proposals, subject to the consultation, were to implement a new boroughwide additional licensing scheme, with the following criteria:
- (a) An additional HMO licence will be required for properties that are rented to three or four occupiers in two or more households that share (or lack) toilet, washing and cooking facilities.
 - (b) An additional license will apply to HMOs that do not fall within the remit of the mandatory HMO licensing scheme. These are properties that:
 - have been converted into self-contained flats; and
 - the conversion did not comply with the relevant building regulations in force at that time and still does not comply; and
 - less than two thirds of the flats are owner occupied
 - are multiple-occupied flats in purpose-built blocks (with over two flats) where more than three people live in the flat.
- 3.2.8 An extensive public consultation, widely publicised using various channels of communication, was undertaken for 13 weeks between 10 March 2025 and 10 June 2025. Full details of the consultation are detailed in the consultation report (**Appendix 1**) which sets out how the Council conducted the consultation and the response received. As required by the Housing Act 2004, the Council must consider any representations made which are not withdrawn. The Council's response to these representations can be found in **Appendix 2**.
- 3.2.9 In order to ensure independence, the Council commissioned Cadence Innova, an independent management consultancy, to undertake the consultation exercise on its proposals. Consultation activities included an online survey, live online public meetings, and outreach to key stakeholders. The exercise sought views from residents, private tenants, private landlords, lettings/managing agents, businesses and other stakeholders about the

Council's proposals. Additional effort ensured that landlords resident outside the borough were also advised of the consultation exercise.

- 3.2.10 The consultation background materials and evidence base report (Housing Conditions and Stressors Report, Metastreet 2024) highlight the substantial issues related to poor housing conditions and antisocial behaviour (ASB) associated with HMOs in Brent, and that inadequate management of HMOs significantly contributes to substandard property conditions. These documents were made available during the consultation to support the proposals and can be found in **Appendices 3 and 4**.
- 3.2.11 The consultation generated 381 responses from the online questionnaire. In summary, the overall majority, 53% of respondents agreed with the Council's proposal to introduce a further boroughwide additional HMO licensing scheme to regulate property conditions and management in HMOs and help tackle anti-social behaviour. Analysis by stakeholder group shows that the majority of those in support of the proposals are residents and local businesses, and other stakeholder groups, whereas those who opposed the proposals are predominantly landlords or letting/managing agents with 63% expressing disagreement.
- 3.2.12 Respondents were also asked about their views on whether they thought a further additional HMO licensing scheme in Brent would help to achieve certain outcomes. The majority of survey respondents (48-58%) agreed that additional HMO licensing would help to address issues in the PRS, including improving property conditions, tenant safety and tackling neighbourhood problems such as ASB. Notably, 57% of respondents agreed or strongly agreed that the scheme would help identify poorly performing landlords and letting agents over the five-year period.
- 3.2.13 In the qualitative feedback section of the questionnaire, some respondents including both PRS residents and landlords, expressed concerns about the cost of licensing and that it would be passed on to tenants. Another common theme emerging was that the Council should focus on using its existing powers rather than designate a further additional HMO licensing scheme. The Council's response to these representations can be found in **Appendix 2**.
- 3.2.14 Having carefully considered the consultation representations there are no changes recommended in regard to the proposals to introduce a new boroughwide additional HMO designation.
- 3.2.15 The proposed additional HMO designation can be found in **Appendix 5**.

Proposed Licence Conditions

- 3.2.16 Section 67 of the Housing Act 2004 allows the Council to impose conditions to licences granted in order to regulate the management, use and occupation of the HMO and its condition and contents. The conditions are a combination of those which local authorities must impose (mandatory conditions by law),

and those which they have a power to impose. Draft licence conditions were available for persons to comment on during the consultation.

- 3.2.17 The consultation asked respondents for their views on the proposed licence conditions. The overall majority of respondents, 54%, agreed with the proposed licence conditions, while 32% of respondents disagreed.
- 3.2.18 During the consultation the Council received feedback in relation to the proposed licence conditions via free text comments and written representations. Following consideration of the feedback received, 3 conditions have been amended. The details of these changes can be found on pages 10, 16 and 17 of the Council's response to the consultation (**Appendix 2**).
- 3.2.19 Taking these changes into account, the revised proposed additional HMO licence conditions are attached as **Appendix 7**.
- 3.2.20 These changes will include the conditions for both additional and mandatory HMOS

Proposed Licence Fee

- 3.2.21 Landlords or managing agents will be required to pay a licence fee for each property requiring a licence in the designated area. The proposed additional licensing fee is £1,040 for the application, processing and inspection of up to five habitable rooms (lounge, dining room or bedroom). For each additional habitable room there is an additional charge of £25 per room a five-year licence.
- 3.2.22 Licences will normally be granted for the duration of the scheme (up to five years). Where the council has concerns about the management and use or occupation of the property a licence for a shorter period may be granted, usually for 1 year.
- 3.2.23 The proposed fee schedule was made available for persons to comment on during the consultation. It set out the fees the Council was proposing to charge, together with a proposed discount of £40 for applicants who are members of a London Landlords Accreditation Scheme.
- 3.2.24 46% of all respondents considered the fee to be too high, conversely 23% thought that the fee was too low and 22% considered the fee to be about right. Analysis by stakeholder group reveals that the majority of those who consider the fee to be about right or too low fall into the resident and local business, and other stakeholder groups, 19-44%. However, landlord, letting or managing agents were consistently opposed to the fee level, with 81% stating that the fee is too high.
- 3.2.25 Half of all respondents, 50% considered the Accredited Landlord discount to be too low. As before, residents and local businesses were more likely to

consider the discounts reasonable or too high, whereas landlords or letting/managing agents consider them insufficient.

- 3.2.26 Concerns over fees were strongly expressed by respondents in the free text parts of the survey, with comments including ‘fee costs will be passed on to tenants’, ‘more like an extra tax’ and ‘will drive good landlords out of the local rental market’. The Council’s response to these representations can be found in **Appendix 2**.
- 3.2.27 Having carefully considered the consultation representations in relation to the proposed level of fees and discounts the Council is not proposing to make any changes to the proposed fee structure, **Appendix 8**.

Objectives of the proposed Additional HMO scheme

- 3.2.28 The Council proposes to use additional HMO licensing to continue to improve housing conditions and management standards in HMOs, reduce ASB, provide support to maintain a clean and safe environment and increase awareness for tenants of the minimum standards they should expect in the PRS. Information about the scheme objectives was provided within the consultation documents and detailed in **Appendix 6**.
- 3.2.29 The Additional HMO licensing scheme provides the framework for the Council to achieve its objectives. This scheme ensures that landlords adopt a more hands-on approach to tenancy management in their privately rented homes. Licence conditions will require licence holders to meet obligations related to the letting and proactive management of their HMO properties.
- 3.2.30 All HMO properties will be inspected and landlords will be notified of any necessary safety and improvement works to maintain appropriate standards. The Council will ensure that any Category 1 and 2 hazards identified are remediated and that licence conditions are complied with.
- 3.2.31 The Council aims to reduce anti-social behaviour (ASB) in HMOs by working proactively with landlords and property owners to prevent and address ASB. This will be achieved through a collaborative effort involving the local authority and other agencies. Guidance and advice will be provided to landlords on managing tenants involved in ASB, especially in cases where serious ASB necessitates formal court action. Officers will work collaboratively with multidisciplinary teams and internal and external stakeholders, including the Police, to identify properties of concern, improve property conditions, and reduce ASB.
- 3.2.32 The consultation asked respondents for their views on the proposed licensing scheme objectives. The overall majority of respondents, 52%, agreed with the proposed licence objectives, while 27% of respondents disagreed.

Alternatives to licensing

- 3.2.33 A local authority must not make an additional HMO licensing designation unless consideration has been given to other courses of action available to them that would achieve the objectives they would want the designation to achieve.
- 3.2.34 The Council has considered a number of other courses of action or alternatives to renewing the additional HMO licensing scheme, but do not believe that, individually or collectively, they provide an effective, or as effective means of tackling poor conditions and raising the standard of management within HMOs in the borough. The alternative options considered are set out in the Council's consultation evidence documents (**Appendix 3**) and a summary of these alternatives is as follows:
- I. **To operate a mandatory HMO licensing scheme only** - The Council has the option to not introduce a new additional licensing scheme. This would mean that, generally, only larger HMOs meeting the mandatory criteria would require a licence. There is clear evidence to show that the number of HMOs in Brent is much higher than those covered by the mandatory scheme. If discretionary licensing powers are not utilised the majority of HMOs will remain unregulated.
 - II. **Use of Part 1 Housing Act 2004 powers to deal with enforcement of housing standards** – Formal statutory notices can be served that require improvements to a property. If the notice is not complied with the council can carry out works in default or may prosecute the landlord. Works in default can however be expensive and resource intensive for the Council, with the risk that not all costs are recovered. Formal action is generally slow, with appeal provisions against most types of notices served, which can significantly delay the time period for compliance. These powers alone would be insufficient to tackle the scale of the problems in the HMO population in Brent.
 - III. **Rely on prosecutions and civil penalties** – Successful prosecutions or the imposition of civil penalties do not in themselves secure improvements in property conditions and the Council's costs in pursuing legal action are not always met in full. These powers are reactive and do not place any obligation on landlords to be proactive in improving conditions within a property. The absence of licensing significantly reduces the scope of the Council to impose civil penalties in respect of identified housing breaches.
 - IV. **Wider promotion of voluntary accreditation landlord schemes** - We recognise that accredited landlords are key to raising standards in private sector housing, and encourage all landlords to become accredited and achieve a level of knowledge and competence before letting a home. However schemes require voluntary landlord engagement, our experience is that compliant landlords become

accredited; rogue landlords do not proactively participate in such schemes.

- V. **Use of Improvement grants to improve substandard properties** - Grants can be used to subsidise improvement works, raising standards and providing benefits for landlords and tenants.. However, generally there are few grants available, and the Council has very limited scope to offer grants through successful external funding bids. In the most part, grant awards would fund improvements that the landlord should be carrying out to meet their legal obligations. Any grant scheme would be discretionary and would rely on voluntary landlord engagement.
 - VI. **Use of ASB powers** - Formal notices can be served at addresses identified as having ASB issues. This can resolve ASB at the particular address. Action would generally be taken against the tenant in occupation. The powers do not place any obligations on landlords to be proactive in managing their properties to prevent or reduce the likelihood of ASB occurring.
 - VII. **Use of new powers made available by the Renters Rights Bill** - Although the Council will gain additional powers to address standards in the private rented sector, the Renters Rights Bill does not establish a proactive approach to housing standards. It still relies on tenants to report issues and landlords to be transparent about problems. In areas like Brent, where affordable accommodation is scarce, tenants are less likely to complain for fear of jeopardising their housing situation. Additionally, the specifics of the proposed legislative changes, any impact on licensing schemes and their implementation timeline are still unknown. Consequently, relying on the Governments proposed reforms is not deemed a viable option.
- 3.2.35 An additional HMO licensing scheme would place the responsibility on the landlord to inform the Council that their property is licensable and encourage them, with the Council's support, to ensure that they meet the required standards. The Council can then prioritise its resources effectively to dealing with the HMO properties of most concern and target enforcement actions to those landlords who fail to licence their properties and/or breach licence conditions.
- 3.2.36 Respondents were also asked whether there were any alternative measures they thought should be considered to improve poor conditions and raise management standards in HMOs. Suggestions included additional elements to the scheme, rather than opposing the scheme. A major theme was that the council should focus on building new homes, raise awareness amongst tenants and provide more targeted approach which does not penalise but supports and incentivise good landlords so as not to deter investment in the rental market. The Council's response to these representations can be found in **Appendix 2**.

3.2.37 The Council has carefully considered the consultation feedback and representations. The Council is committed to improving housing standards in the private rented sector and considers that the proposed additional HMO licensing scheme is critical to the prospects of achieving its objectives. No other alternatives have been identified that would, individually or collectively, be capable of delivering the scheme objectives that the Council would achieve through the operation of a boroughwide additional HMO licensing scheme.

4.0 Stakeholder and ward member consultation and engagement

4.1 An extensive and well publicised public consultation was undertaken over a 13 week period from 10 March 2025 until 10 June 2025. Detailed information on the consultation process, results and feedback from stakeholders is in the consultation report (**Appendix 1**). The consultation report outlines the Council's method and channels used to consult with stakeholders and those likely to be affected by the proposals, both within and outside the borough. In accordance with Section 56(3)(b) of the Housing Act 2004, the Council must consider any representations made during the consultation and that are not subsequently withdrawn. The Council's responses to these representations are documented in **Appendix 2**.

4.2 Consultation and publicity activities included:

- i. online questionnaire
- ii. paper copies of the questionnaire made available in five libraries across the borough and the Civic Centre
- iii. two virtual public meetings held with landlords, tenants, residents, and landlord groups
- iv. adverts placed in local and out of borough newspapers
- v. articles in e-newsletters
- vi. outdoor advertising campaign using Global Media and JC Decaux sites across Brent, Camden, Ealing, Hammersmith & Fulham, Harrow and Kensington & Chelsea
- vii. leaflet drop to businesses and residential properties in key areas of the borough
- viii. direct email sent to known landlords, letting and leaseholders in the borough
- ix. posters, leaflets and pull up banners displayed in in Brent owned buildings such as libraries
- x. dedicated email address for written feedback

4.3 The Council also used digital and social media to advertise the consultation, including a video featuring Councillor Fleur Donnelly-Jackson, Cabinet Member for Housing, giving information on why the consultation was being held, the ambitions the Council held in relation to the PRS, in particular HMO properties and how to take part in the consultation. Additional effort ensured that landlords residing outside the borough were also consulted.

4.4 The consultation generated 381 responses from the online questionnaire. The online forums were widely publicised and 75 people registered to attend the

events and a total of 54 people attended. Two written representations were received from stakeholder organisations and two letters of support for the scheme were received from neighbouring and other London borough councils.

5.0 Financial Considerations

- 5.1 The proposed additional HMO licensing fee is £1,040 for the application, processing and inspection of up to five habitable rooms (lounge, dining room or bedroom). For each additional habitable room there is an additional charge of £25 per room.
- 5.2 The fee is levied in two parts. Part 1 of the fee (£540) is charged when the licence application is made and covers the costs of processing, administration and validation of the application. Once the decision to grant the licence is made, Part 2 of the fee (£500) is charged which covers the costs of the administration, management, and enforcement of the licensing functions for the scheme.
- 5.3 A financial assessment has been completed to ensure cost neutrality over the course of a 5 year period and taking into account the relevant discounts. The costs of resourcing the scheme reduces in line with the number of licences that need to be managed and enforced during this period.
- 5.4 In setting the fee the Council has had regard to the Provision of Service Regulations 2009 and sections 63(7) of the Housing Act 2004 which confirms that "when fixing fees the local authority may take into account all costs incurred by the authority in carrying out their functions".
- 5.5 The Regulatory Impact Assessment on licensing makes it clear that authorities should not use fee income to raise additional revenue, the fees should be set for cost recovery of the scheme.
- 5.6 The proposed licence fees will be sufficient to cover the estimated costs of establishing and administering the schemes and also the undertaking of any enforcement action.
- 5.7 The staffing costs included in the fees model cover processing applications (including recruitment and training), conducting inspections of premises, handling appeals against licensing decisions, and other costs associated with ensuring compliance with the scheme.

	year 1	year 2	year 3	year 4	year 5	Total
Total Expenditure	£ 529,100.00	£ 359,520.00	£ 377,496.00	£ 396,370.80	£ 416,189.34	£ 2,078,676.14
Total income	£ 1,040,000.00	£ 520,000.00	£ 208,000.00	£ 208,000.00	£ 104,000.00	£ 2,080,000.00
Net operating position (i.e. Total Income less Total Expenditure)	£ 510,900.00	£ 160,480.00	-£ 169,496.00	-£ 188,370.80	-£ 312,189.34	£ 1,323.86

*The income is based on 2000 properties licensed over the 5yrs.

- 5.8 The HMO Licensing account will operate on a near break-even position over the 5-year period of the scheme in terms of income and expenditure. Any surpluses will be set aside in reserves to offset the deficit anticipated in future years. This will allow the profile of income and expenditure to be managed flexibly over the period of the scheme enabling peaks and troughs in activity to be managed.
- 5.9 There is the potential risk of a significant under recovery of income and a failure to effectively achieve the schemes objectives if the Council does not receive the estimated number of applications and fees. This risk has been mitigated by ensuring that sufficient staffing resources are allocated to identifying unlicensed properties.
- 5.10 Should the number of licences vary from those anticipated, and/or the profile of applications change, the resourcing requirement will be flexed to manage any pressure this creates within existing budgets. Some staff have been recruited on fixed term contracts which are extended on an annual basis to allow for resource flexibility.
- 5.11 The licence fee will cover the owner of the property for a period up to 5 years, however, should ownership of the property be transferred within that period, a further licence fee will be payable by the new owner.
- 5.12 The actual financial position of the scheme against the budget will be robustly reviewed on an annual basis. This will be undertaken as part of the Council fees and charges process to ensure that the fees remain reasonable and proportionate. The Council is aware that any consistent surplus must be used to adjust fees in upcoming years, although some reinvestment over more than a year is permitted. This balance will be assessed in the yearly review and adjustments made accordingly if required.
- 5.13 The licence fee set, and the financial assessment, are based on the assessments and evidence specific to Brent and does not allow comparison to other Councils, due to variations around property numbers, costs associated with each council (e.g. salaries, on costs, ICT, back office etc.), approach and operations.

6.0 Legal Considerations

- 6.1 Section 61 of the Housing Act 2004 requires the Council to administer a licensing scheme for all large HMOs. Mandatory licensing applies to all privately rented HMOs occupied by five or more people who form two or more households.
- 6.2 Section 56(1) of the Housing Act gives councils the discretion to introduce additional licensing of other types of (smaller) HMOs which are not subject to mandatory licensing. The authority must consider that a significant proportion of the HMOs of that description in the area are being managed sufficiently ineffectively as to give rise, or to be likely to give rise to one or more particular problems either for those occupying the HMOs or for members of the public.

and in forming an opinion of this must have regard to any information regarding the extent to which any codes of practice approved under section 233 have been complied with by persons managing HMOs in the area in question. The Council must also be satisfied that the designation will significantly assist with dealing with the problems.

- 6.3 Section 56(3) of the Housing Act 2004 requires that that when considering designating an additional HMO licensing area the local housing authority must take reasonable steps to consult persons who are likely to be affected by the designation, and consider any representations made in accordance with the consultation and not withdraw.
- 6.4 In line with the case of **R v London Borough of Brent ex parte Gunning**, (as affirmed and endorsed by the Court of Appeal in *R v North and East Devon Health Authority ex parte Coughlan* [1999] EWCA Civ 1871, four principles must be met in order for there to be a legitimate consultation, specifically online consultations (the Gunning Principles); these are:
- i. the proposals were consulted on at a formative stage (a final decision has not been made or predetermined),
 - ii. sufficient information and reasons have been given for the proposals to enable the consultees to consider them and respond intelligently,
 - iii. adequate time has been allowed for consideration and response for participants,
 - iv. 'conscientious consideration' has been given to the consultation responses before a final decision is made, providing evidence this has been undertaken.
- 6.5 Additionally, the Supreme Court in **R ex parte Moseley v LB Haringey [2014]** UKSC 56 endorsed the Gunning Principles and also added two further general principles:
- v. The degree of specificity regarding the consultation should be influenced by those who are being consulted.
 - vi. The demands of fairness are higher when the consultation relates to a decision which is likely to deprive someone of an existing benefit. Additionally, recent case law it is emerging that those affected by the proposals must be consulted: *R (on the application of National Council For Civil Liberties) -v- Secretary of State for The Home Department and Public Law Project (Intervener)* [2024] EWHC 1181 (Admin)
- 6.6 Before making any decision, Cabinet must be satisfied that the above principles have been met. Cabinet must also have due regard to the responses received through the consultation undertaken and take those into account when making its' decision. Additionally, Cabinet must also consider whether there are any other courses of action available to it that would achieve the same objective or objectives as any proposed scheme without the need for the designation to be made.

Other criteria to be met prior to designating an additional licensing scheme

- 6.7 Before designating an additional HMO licensing scheme, the Council must also be satisfied that:
- the proposed designation is consistent with the overall housing strategy,
 - a co-ordinated approach is adopted in dealing with homelessness, empty properties and ASB.

Housing Strategy

- 6.8 The designation of an additional HMO scheme is consistent with the Council's Private Sector Housing Strategy 2024-2029 which aims to ensure that the private housing sector in Brent is a safe, stable and accessible option for all residents. The additional HMO licensing scheme is integral to achieving the Council's strategic aims in the PRS, with the proposed scheme objectives supporting and underpinning these goals.

Homelessness Strategy

- 6.9 The Brent Homelessness and Rough Sleeping Strategy 2020-2025 outlines the Council's strategy to maximise the prevention of homelessness and to minimise the negative impacts of homelessness upon families and individuals where prevention is not possible. Although the PRS presents a challenge, it also offers an opportunity in preventing and resolving homelessness. Through HMO licensing and enforcement processes, as well as collaboration with local landlords through the Landlord Forum, we will continue to improve standards and drive-up conditions in HMOs and increase the supply of much needed stable homes. This, along with tenant education on rights and responsibilities, will support tenancy sustainment in the PRS and help in reducing homelessness in the borough.

Empty Properties Strategy

- 6.10 The Private Sector Housing Strategy 2024-2029 sets out Brent's vision in relation to empty properties which is to increase the supply of private sector homes available in Brent, so it is an accessible housing option for our residents (commitment 1). Empty properties are a wasted resource for both the community and the owner and can cause a variety of issues such as reducing the supply of housing and attracting ASB. Bringing empty properties up to standard and back into use as decent liveable homes is complementary to the objectives of the proposed additional HMO licensing scheme and other council strategies like homelessness and ASB reduction.

Anti-Social Behaviour Strategy

- 6.11 The council has committed to effectively and proportionately challenging any form of ASB within its Safer Brent Community Safety Strategy 2024-2026. Residents have the right to quiet and peaceful enjoyment of their environment,

and the council ensures cases are resolved through effective intervention and support services. To tackle ASB problems, we have made it conditional on all private landlords who hold property licences to prevent and combat ASB associated with properties they manage. Additional HMO licensing will enable the Council to encourage landlords to work with their tenants to reduce ASB. Information and support will be available both online and through forums.

Duration and notification of a licensing scheme

- 6.12 An additional HMO licensing scheme cannot come into force until three months after it is made.
- 6.13 Section 59 of the Act requires local housing authorities to publish a notice of the designation once it has been confirmed. A local housing authority must:
- publish a notice within the designated area within seven days of the designation being confirmed.
 - notify all those consulted on the proposed designation within two weeks of the designation being confirmed.
- 6.14 A designation ceases to have effect no later than 5 years after the date on which it comes into force.
- 6.15 Once made, the operation of the designations must be reviewed from time to time and if appropriate the designation may be revoked, if the council does so, they must publish a notice of the revocation in prescribed form as provided by section 60 of the Act.

Challenge

- 6.16 A designation may be challenged by way of judicial review. The time for seeking judicial review is within 3 months of the date the designation is made. The general legal principles of reasonableness, procedural propriety and proportionality will be applied by the courts on any such review.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 The Council has a Public Sector Equality Duty (PSED) under the Equality Act (2010) to have due regard to the need to:
- i. Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
 - ii. Advance equality of opportunity between people who share those protected characteristics and people who do not.
 - iii. Foster good relations between people who share those characteristics and people who do not.
- 7.2 A full Equality Analysis (EA) has been carried out and is attached at **Appendix 9**. The EA has taken account of the consultation process, the information

gathered through that process and assessed the impact that the recommendations could have on different protected groups and, where possible, identified methods for mitigating or avoiding any adverse impact on those groups.

- 7.3 The EA notes that private rented sector tenants are more likely to be children or young adults, people with disabilities, people from BAME communities, and/or lone parents. The EA details the impact that the proposals can be expected to have on people who share the protected characteristics and concludes that they will likely have a positive impact in terms of housing quality.
- 7.4 Council officers worked closely with Cadence Innova to ensure that there was a properly representative response to the public consultation, fully reflective of our diverse community.
- 7.5 Appropriate measures will be taken to remove any barriers to the licensing scheme for people who need reasonable adjustments. This will include, but not be limited to, a range of ways in which the scheme can be accessed and support provision for landlords on request.

8.0 Climate Change and Environmental Considerations

- 8.1 In 2021, Brent declared a climate and ecological emergency and pledged to achieve carbon neutrality in the borough by 2030. The Brent Climate & Ecological Strategy 2021-2030 recognises that better insulating homes and making them more energy efficient is one of the key actions that must be taken to reduce carbon emissions.
- 8.2 Additional HMO licensing will contribute to achieving Brent's climate change vision by enforcing energy efficient standards in the PRS, helping to reduce the overall energy consumption and carbon emissions of the borough.
- 8.3 HMOs usually generate more waste than other property types, over production and incorrect presentation of waste, recycling contamination and fly tipping. Ineffective waste management can pose public health concerns or contribute to litter and fly-tipping issues, as well impact on the street scene of Brent's neighbourhoods. The proposed licence conditions that would accompany any granted additional HMO licence are set out in **Appendix 7**.
- 8.4 It is a mandatory licence condition that the licence holder must comply with the refuse and recycling scheme provided by the Council. It is also a requirement that licence holders provide adequate waste receptacles for the number of occupants for the storage and disposal of household waste pending collection and sets out conditions for waste and recycling to occupiers at the start of their tenancy. Failure to meet these licence conditions can lead to financial penalties and enforcement action.

9.0 Human Resources/Property Considerations (if appropriate)

- 9.1 With the introduction of Selective and Additional licensing in January 2015 Private Housing Services already has well established, dedicated and experienced team of officers employed to both process applications and inspect properties as well as carry out and required enforcement activities. Since 2015 the services has been fully funded from the licence fee income and over that time license application and administration officers have been employed on a temporary contract basis to deal with any additional demand.

10.0 Communication Considerations

- 10.1 Should Cabinet agree to confirm the additional HMO designation, a comprehensive communication and engagement plan, including a detailed go-live strategy will be developed. This plan will ensure that all key stakeholders – such as residents, tenants, landlords, managing agents, and other community members who live or operate businesses or services in the area, are aware of the scheme's implementation.

Report sign off:

Thomas Cattermole

Corporate Director, Residents and Housing
Services

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Improving the Private Rented Sector in Brent

Report on Brent Council's consultation on additional HMO licensing proposals

July 2025

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1. Executive Summary

Brent Council is committed to addressing problems associated with houses of multiple occupation (HMOs) and property licensing is a way of driving up standards and ensuring safer and better managed HMO accommodation. Like all councils across the country, Brent operates a national mandatory HMO licensing scheme for larger HMOs. On 1 February 2020, Brent introduced a boroughwide additional HMO licensing scheme to ensure safety standards for tenants living in smaller houses in multiple occupation (HMOs), that are occupied by three or four people living in two or more households. This scheme excluded those licensed through the mandatory HMO licensing scheme and ended on 31 January 2025.

While the past schemes have resulted in significant improvements, Brent believe that a further additional HMO licensing scheme is necessary to maintain and improve the management of HMOs in the borough. HMOs pose a higher risk to occupants, especially when poorly managed. The previous additional HMO licensing scheme has helped to improve standards and management practices of many HMOs across the borough. However, the evidence shows that there is a significant number of properties that are still substandard and potentially dangerous. Even landlords with good intentions may not always be aware of the latest legal and safety requirements. These HMOs pose a risk to the health, safety, and wellbeing of tenants, cause problems for neighbours, and demand substantial intervention from council enforcement services. It is important that the council uses all available tools to improve conditions for tenants in this sector. Licensing is one of the tools and plays a key role in this effort.

A further boroughwide additional HMO licensing scheme is proposed for all HMOs (excluding those licensed through the mandatory HMO licensing scheme) that if approved, would come into force in Autumn 2025. When proposing to introduce discretionary property licensing schemes, the Housing Act 2004 requires councils to take reasonable steps to consult with all persons likely to be affected by the proposed designation(s). Brent Council commissioned Cadence Innova, an independent consultancy, specialising in collaborating with local authorities, to deliver public consultations to undertake an extensive programme of consultation activities and report independently on the findings.

To help inform all stakeholders, a consultation evidence pack was developed by Cadence Innova in conjunction with Brent Council, and this, along with other relevant documents, was available for the duration of the consultation on the council's [website](#). The council also had a dedicated phoneline and email inbox specifically to receive comments and submissions and to communicate with stakeholders for the duration of the consultation.

The consultation ran for 13 weeks from 10 March 2025 until 10 June 2025 and utilised a variety of methods to reach and seek opinions from all those likely to be affected by the council's proposals, both within and outside of the borough.

These methods included:

- an online survey
- two virtual public meetings with landlords, tenants, residents, and landlord groups
- four in-person community drop-in sessions at libraries across the borough.

109 stakeholders were directly contacted and asked for their response to the consultation. Stakeholders included:

- local councillors
- voluntary community sector organisations
- tenant support organisations and housing charities
- emergency service commanders
- all London borough councils.

The council advertised the consultation through digital and print media, as well as in-person methods.

A total of 381 survey responses were received. The survey incorporated a quantitative approach and qualitative responses through free text boxes. Qualitative feedback outside of the survey was also received at two virtual public meetings (the registration page was viewed by 1,439 and attended by 54 people total) and from 4 written representations received from interested parties.

The consultation looked at the level of support for introducing an additional HMO licensing scheme. The consultation also sought views on the proposed licence conditions, associated fees, potential discounts, scheme objectives and the respondents' perceptions of the issues of poor property conditions and antisocial behaviour (ASB) in the borough.

The results of the consultation survey and the views of stakeholders gathered during the consultation are analysed fully in this report.

1.1 Key Findings

The following analysis is based on definitive responses. Where a set of responses totals less than 100%, the remaining proportion of respondents answered, 'neither agree nor disagree' or 'don't know'.

Additional HMO Overall		Landlords, letting or managing agents	Private tenants	Owner-occupiers	Other stakeholders
Total consultation survey responses	381 responses	152 responses	54 responses	151 responses	24 responses

Responses to the question	381 responses	152 responses	54 responses	151 responses	24 responses
Agree with additional HMO licensing proposal	53%	26%	56%	75%	67%
Disagree with additional HMO licensing proposal	41%	63%	41%	21%	33%

Responses to the question	381 responses	152 responses	54 responses	151 responses	24 responses
Agree with proposed AHMO licensing conditions	54%	28%	59%	76%	71%
Disagree with proposed AHMO licensing conditions	32%	49%	31%	16%	21%

Responses to the question	381 responses	152 responses	54 responses	151 responses	24 responses
AHMO licensing fee is about right	22%	12%	26%	29%	29%
AHMO licensing fee is too high	46%	81%	41%	17%	29%
AHMO licensing fee is too low	23%	3%	19%	44%	25%

Scheme Objectives		Landlords, letting or managing agents	Private tenants	Owner-occupiers	Other stakeholders
Responses to the question	381 responses	152 responses	54 responses	151 responses	24 responses
Agree with AHMO scheme objectives	52%	28%	52%	75%	71%

Scheme Objectives		Landlords, letting or managing agents	Private tenants	Owner- occupiers	Other stakeholders
Disagree with AHMO scheme objectives	27%	43%	31%	11%	17%

1.2 Conclusions

As well as the quantitative data from the online survey, respondents had the opportunity to provide their views in free-text form in relation to several questions. The aggregate online analysis therefore offers only a partial view. The survey data, along with the free-form text responses, virtual public meetings, and other written representation received provide vital insights.

There was a degree of uncertainty or neutrality among respondents, suggesting that many may not have strong opinions or find the issues complex. The proportion of responses classified as 'neither agree or disagree', 'don't know/not applicable' or where a respondent did not select any answer is, in some cases, up to 20%, though generally between 10% to 15%. In the case that respondents were unsure about any aspect of the proposed scheme or consultation, the council invited questions and comments through a dedicated phone line, email inbox, public forums and community drop-in sessions.

It is important to note there was a stark contrast in views about the proposals among different stakeholder groups. While private tenants, owner-occupiers and 'other' stakeholders generally support the council's proposals, the 'landlords, letting and managing agents' stakeholder group, and their representative bodies were generally opposed.

The aggregate online survey data shows overall support for the council's proposals. Views expressed in the free-text responses ranged from positivity that the council is actively tackling issues prevalent in the private rented sector (PRS) such as poor housing conditions, ASB and overcrowding to concerns that the scheme is unnecessary, burdensome, a way for the council to generate revenue and the cost of the licence fee would be passed on to tenants.

A significant number of attendees at the public online forums were landlords and managing or letting agents. They called for greater financial transparency and proposed more flexible payment options to encourage continued engagement with the scheme. They also raised concerns about equity, recommending that benefits such as discounts currently offered to LLAS members be extended to landlords affiliated with other recognised bodies. Other key themes included the quality and oversight of council and housing association properties.

The council received a number of written responses from various stakeholders, both supporting and opposing the council's proposals. Another London borough with a current additional HMO licensing scheme wrote to express their support, recognising the challenges in the PRS and expressed the positive outcomes from implementing their own property licensing schemes. In contrast, landlord

representative organisations such as Safeagent and Propertymark objected to the proposals. They argued that the council should utilise existing enforcement powers to address issues in the PRS.

2. Introduction

2.1 Background

Between 10 March 2025 and 10 June 2025, Brent Council consulted on proposals to introduce a boroughwide additional HMO licensing scheme. Property licensing is a way of ensuring safer and better standards in private rented properties.

Brent is consistent with the rest of London in that it has a shortage of affordable housing, with house prices remaining out of reach for many. The demand for social housing far outstrips the supply. As a result, private rented property is increasingly becoming the only viable option for many Brent residents, including those who are vulnerable and on low incomes. Currently, 36% of Brent's housing stock is in the PRS, and this is expected to continue to rise in the future.

While the majority of properties in the PRS are well maintained and safe, there is a growing number of properties that are substandard and potentially dangerous. Even landlords with good intentions may not always be aware of the latest legal and safety requirements. These properties pose a risk to the health, safety, and wellbeing of tenants, cause issues with neighbours, and require numerous interventions from council teams that are already under pressure. It is crucial for the council to utilise all available tools to improve the situation for tenants renting properties in this sector. Licensing plays a key role in this effort.

On 1 February 2020, the council introduced a boroughwide additional HMO licensing scheme to ensure safety standards for tenants living in smaller houses in multiple occupation (HMO) that are occupied by three or four people. This scheme ended on 31 January 2025. The scheme has significantly improved property conditions and management standards in HMOs however, the Council is keen to continue the good work and build on the progress already made.

2.2 Proposals

Brent Council is proposing to introduce a further boroughwide additional HMO licensing scheme that if approved, would come into force in Autumn 2025 and would last for five years.

The proposals, subject to the consultation, were to implement a new boroughwide additional licensing scheme, with the following criteria:

- (a) An additional HMO license will be required for properties that are rented to three or four occupiers in two or more households that share (or lack) toilet, washing and cooking facilities
- (b) An additional license will apply to HMOs that do not fall within the remit of the mandatory HMO licensing scheme. These are properties that:
 - have been converted into self-contained flats; and
 - the conversion did not comply with the relevant building regulations in force at that time and still does not comply; and

- less than two thirds of the flats are owner occupied
- are multiple-occupied flats in purpose-built blocks (with over two flats) where more than three people live in the flat.

2.3 Public consultation

The consultation ran for 13 weeks from 10 March 2025 until 10 June 2025. In order to gather as much feedback as possible from landlords, tenants, residents and other stakeholders, the council used several strategies to promote the consultation.

The consultation focused on the extent to which respondents agree or disagree with the council's proposal to introduce the additional HMO licensing scheme. The consultation also looked at views on the proposed licence conditions, associated fees, proposed discounts, scheme objectives, and the respondents' perceptions of ASB, poor property conditions and other issues in the borough.

Working alongside Cadence Innova, an independent consulting firm, specialising in collaborating with local authorities to deliver public consultations, the council launched a comprehensive communications and marketing campaign to inform all stakeholders about the council's ongoing consultation on the proposed introduction of the additional HMO licensing scheme, with the aim of encouraging active participation.

The communications strategy was designed to inform and educate all stakeholders about the proposed licensing scheme and its potential benefits. The marketing approach was primarily focused on digital activities and online events. However, to meet the needs of the digitally excluded, physical hard copy communications were also made available.

Communications channels

The council used a wide range of communication channels to promote the consultation and make stakeholders aware of the proposals.

The council undertook various activities to engage all stakeholder groups, both within and outside the borough, and to raise their awareness about the consultation. These activities included:

- Updating the council website homepage with a news article and a link to the consultation on 10 March 2025, 23 May 2025 and then again on 5 June 2025
- A link to the consultation was placed on the Renting in the Private Sector landing web page
- A press release to announce the start of the consultation was published on 10 March 2025 and disseminated via the Brent Council press office
- A press release regarding enforcement day activities carried news about the consultation and was disseminated via the council press office on 23 May
- A press release to announce the consultation would soon close was disseminated by the council's press office on 5 June

- A notification was generated from the consultation portal to 8,710 registered users on 10 March 2025
- A direct email was sent to all London councils, landlord accreditation and membership organisations, housing charities and Brent emergency service commanders on 26 & 27 May 2025.

Using the council's social media

- **6** X (formerly known as Twitter) posts with a total of **14** total engagements, **9** shares (re-tweets), **1** comment and **2,540** views
- **6** Facebook posts with a total of, **90** total interactions, **42** likes, **15** clicks, **12** shares and **19,730** views
- **5** LinkedIn posts with a total of **4,441** impressions, **128** total engagements, **83** clicks, 8 reposts and **37 reactions**
- **1** Instagram post with a total of **24** interactions, **20** likes and **1,864** views
- In addition to static organic social media posts containing advertisements to promote the consultation, a video featuring Councillor Fleur Donnelly-Jackson was shared on 6 June 2025 across social media channels (Instagram: 2,482 views, 20 interactions and 20 likes. Facebook story: 410 views, 16 link clicks). The video included information on why the consultation was being held, the ambitions the council held in relation to the PRS in Brent and informed audiences on how to take part in the consultation.

Activities to reach out to Brent tenants and residents included:

- An advert about the consultation was featured in the Brent Magazine, published on 19 March and delivered to more than 135,000 homes
- Information about the consultation was included within 5 issues of the resident e-newsletter from 14 March to 9 June 2025 to 17,132, generating 59 clicks
- Information about the consultation was included within the news to headteachers bulletin, sent to 164 Brent headteachers in the March 2025 bulletin.
- Information about the consultation was included in News to all neighbourhood managers on 14 March 2025
- Information about the consultation was included in the Brent Business E-News to 9,042 subscribers and published on 3 April with 1 link click
- An out of home campaign ran with adverts added to 20 digital screens and 32 paper JC Decaux sites within Brent. The out of home campaign ran from 24 March to 4 May 2025
- Pull up banners, leaflets and posters were displayed at:
 - Ealing Road Library
 - Kilburn Library
 - Willesden Green Library
 - Kingsbury Library
 - Wembley Civic Centre
- Information about the consultation was added to digital screens at the following locations:

- Willesden Green x6 screens
- Wembley Library x2 screens
- Civic Centre
- Leaflets were distributed at the following locations:
 - New Life Bible – Presbyterian Church
 - Sacred Heart Church
 - Kilburn Library
 - Wembley Market
 - Queens Park Market
 - Kilburn Salvation Market
 - Harlesden Salvation Market
- Leaflets were distributed to residential homes and businesses within the following areas across the borough:
 - Harlesden & Kensal Green
 - Kilburn
 - Willesden Green
 - Church Road
 - Queen’s Park.

Activities to reach out to landlords included a direct email to 45,552 known landlords, agents and leaseholders on 27 March 2025.

Activities to reach out to landlords outside of the borough included:

- An out of home campaign ran with adverts added to 14 Global and JC Decaux sites from 19 May – 1 June at train stations and roadside sites within neighbouring boroughs in:
 - Barnet
 - Camden
 - Ealing
 - Hammersmith & Fulham
 - Harrow
 - Kensington & Chelsea

In addition, the Chief Executives of the of the following organisations were written to directly:

- National Residential Landlords Association (NRLA)
- British Landlords Association (BLA)
- iHowz
- Safeagent
- UK Association of Letting Agents.

The Accreditation Officer at the London Landlord Accreditation Scheme (LLAS) was also directly contacted.

The following organisations were included on the press release distribution list:

- NRLA
- Arla Propertymark
- Safeagent
- LLAS
- iHowz
- Letting Agent Today
- London Property Licensing website
- British Landlords Association
- Guild of Letting & Management.

Information about the consultation was presented at a landlord training event that was held in partnership with the London Landlord Accreditation Scheme on 12 May 2025 and attended by approximately 15 people.

The consultation was included within x3 Landlords Newsletters, the details are shown below:

- 27 March to 19,555
- 16 April to 971
- 28 April to 19,605

A digital campaign with London Property Licensing (LPL) ran between 12 March to 10 June 2025. LPL is the award winning, leading website for informing private landlords in the UK. It is the only website dedicated to providing simple, impartial and expert advice on property licensing and explaining the licensing requirements across every London borough. The website reaches out to landlords based throughout the UK and those based abroad. Since launching in April 2015, the website has received more than 2 million views. The Brent campaign included:

- From 26 March to 10 June 2025, a pixel banner advert promoting the licensing consultation was placed on the LPL homepage and 8 London borough pages:
 - Barnet
 - Brent
 - Camden
 - Ealing
 - Hammersmith & Fulham
 - Harrow
 - Kensington & Chelsea
 - Westminster
- Anyone clicking on the advert was taken directly to the council's consultation webpage
- On 12 March 2025, the LPL Brent webpage was updated with information about the licensing consultation and a direct link to the council's consultation webpage in the orange 'At a Glance' box to encourage people to find out more and take part in the

consultation. This is an additional feature added during the promotional period. The webpage was updated on 14 April, when the consultation was closed.

- From 19 March to 10 June 2025, a Brent licensing consultation listing was displayed on the LPL website and promoted on the home page, the licensing consultations page and on the same eight London borough pages listed above. The listing summarised the purpose of the consultation and explained how to take part. The consultation webpage promoted consultation events taking place on 30 April and 21 May 2025.
- The Brent consultation listing was displayed on the LPL website and promoted on the home page, the licensing consultation page and the LPL Brent page.
- A news articles about the consultation was published on 13 March 2025 and promoted via social media and the LPL newsletter.
- The Brent consultation was promoted in newsletters distributed on 26 March, 30 April and 5 June 2025. The newsletter is widely distributed to landlords, letting agents, organisations, local authority officers and government officials and sent to at least 3,700 people who have requested updates on housing regulation and property licensing schemes in London. The newsletters also displayed the Brent banner advert with a direct link to the consultation page on the council's website.
- The LPL LinkedIn page and LPL Facebook page carried news of the consultation on 18 March 2025.
- Posts about the licensing consultation were published on the LPL X (formerly known as Twitter) feed (@lplicensing) every 12 to 14 days, timed to cover a variety of morning, afternoon and evening posts, throughout the length of the consultation period. During this period the @lplicensing X feed had more than 2,300 followers, generating impressions, likes, reposts and comments.

Activities to make digitally excluded and vulnerable stakeholders aware of the consultation included:

Reaching out to the following churches and foodbanks:

- New Life Bible – Presbyterian Church
- Sacred Heart Church
- Kilburn Salvation Army
- Harlesden Salvation Army

Posters and paper copies of the consultation were available at the following locations within the borough from 10 March – 10 June 2025:

- Ealing Road Library
- Kilburn Library
- Willesden Green Library
- Kingsbury Library
- Wembley Civic Centre

- Granville Community Kitchen
- Kilburn Street Kitchen
- Salvation Army Lunch Club
- Brent Food Bank
- X6 Sufra locations
- Willesden Mutual Aid

Direct emails were sent to all of the Leader's offices, Chief Executives, Regulatory and Housing services at all boroughs across London on 26 & 27 May 2025.

Chief Executives of the following organisations were sent direct emails:

- Generation Rent
- Cambridge House Safer Renting
- St Mungos
- Homeless Link
- Citizens Advice Brent
- Shelter
- Refugee Council

Activities to make stakeholders within the council aware of the consultation included:

- The consultation was included as an item for discussion at the wider Departmental Management Team meeting, held on 10 March 2025. There were approximately 27 attendees
- Information about the consultation was available on digital screens within the Civic Centre
- Information was included in Members Bulletin to 132 recipients on 20 March, 3 April, 16 April and 1 May 2025
- The consultation was included within all 2,600 Brent staff email signatures
- A notice was placed within the internal newsletter, The Loop on 21 March 2025, sent to 2,759 and clicked 364 times
- A notice was placed on internal channel, Viva Engage on 12 March 2025, receiving 5 likes and was seen by 239
- A further notice was placed on Viva Engage on 16 May 2025, receiving 15 reactions and seen by 340
- Updating the council website corporate homepage carousel to include the consultation
- Posting a news article about the consultation on the council website during the first week of the consultation

2.4 Consultation methods

The council used several methods to gather feedback from stakeholders about the council's proposals.

Online survey

An online survey was open to the general public. Respondents could also request a paper version of the survey. A total of 381 survey responses were received. The consultation survey was the main method of gathering feedback during the consultation. Respondents were asked their views on

additional HMO licensing, the proposed fees, discounts, licence conditions, scheme objectives and their views on issues within the borough. Their responses are analysed and broken down by stakeholder type below. A copy of the survey questionnaire can be found in Appendix 3.

Public forums

The council held two virtual public forums to provide more information about the proposed scheme and to gather feedback from landlords, residents and other stakeholders who would be impacted by licensing. The virtual public meetings were held over Microsoft Teams and were facilitated by Cadence Innova. This included a presentation of the council's proposals followed by a question-and-answer session with council officers. These events are summarised below:

- 30 April 2025
- 21 May 2025

The above meetings were widely publicised. 11 people registered for the first event with 16 actual attendees. 64 people registered for the second event with 38 actual attendees.

The council held 2 in-person Landlord Forums on 30 April 2025 and on 21 May 2025 at the council offices. The event was open to all landlords and agents operating in the borough to learn more about the council's proposals and to share views. A total of 100 people attended.

The council also held four in-person drop-in sessions (which required no pre-registration) to help stakeholders understand the proposals and to signpost them towards the questionnaire or the dedicated email address to express their views.

Drop-in sessions		
Date	Time	Venue
23 April 2025	10:30am – 2:30pm	Wembley Library
6 May 2025	10:30am – 2:30pm	Harlesden Library
7 May 2025	10:30am – 2:30pm	Willesden Library
14 May 2025	10:30am – 2:30pm	Kingsbury Library

Other written feedback

The council accepted feedback on the proposed licensing scheme by email or written response. The feedback in the emails received and written responses has been analysed below. The council received 8 email responses regarding the consultation. This included 2 written responses received from stakeholder organisations, found in full at Appendix 4.

Letters of support for the scheme were received from the London Assembly Member for Brent and Harrow and also from another London borough council with a current additional HMO licensing scheme, found in full in Appendix 5.

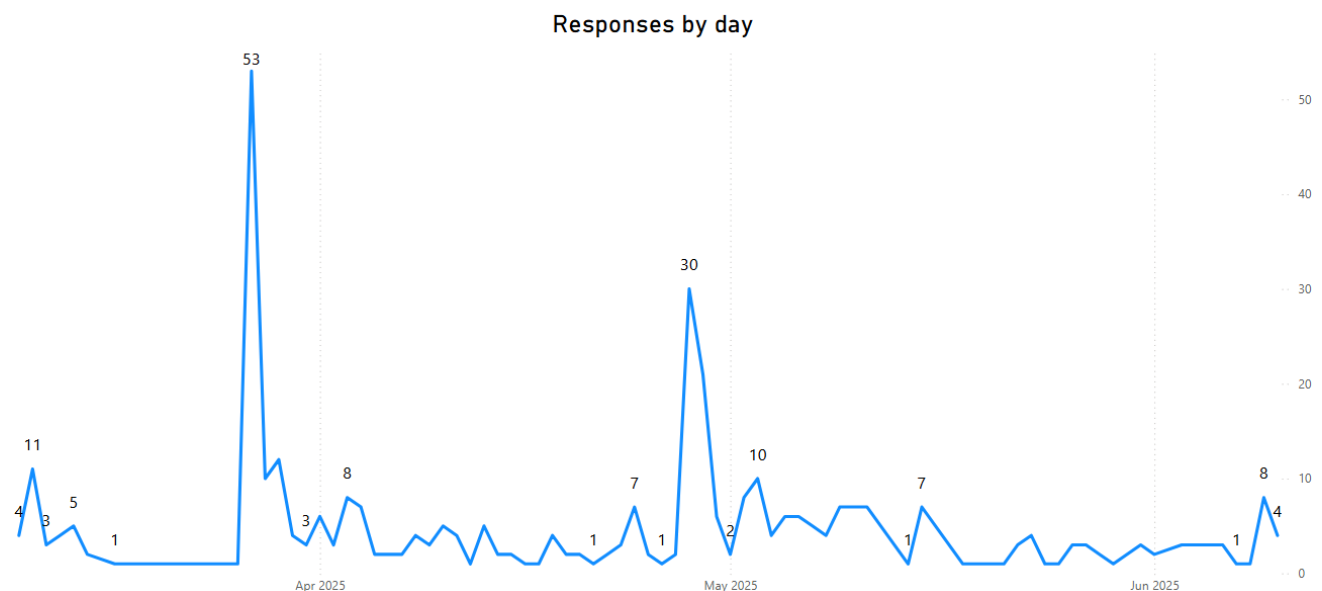
3. Consultation survey results

This section of the report presents the results from the consultation survey. There were **381** responses to the consultation survey.

In the following analysis, the percentages are based on the answers to the question and will state where fewer than the total 381 respondents answered the question.

3.1 Overall consultation response

The consultation ran from **10 March to 10 June**, during which time, different stakeholder groups were engaged in myriad ways. The timeline of responses is shown below:

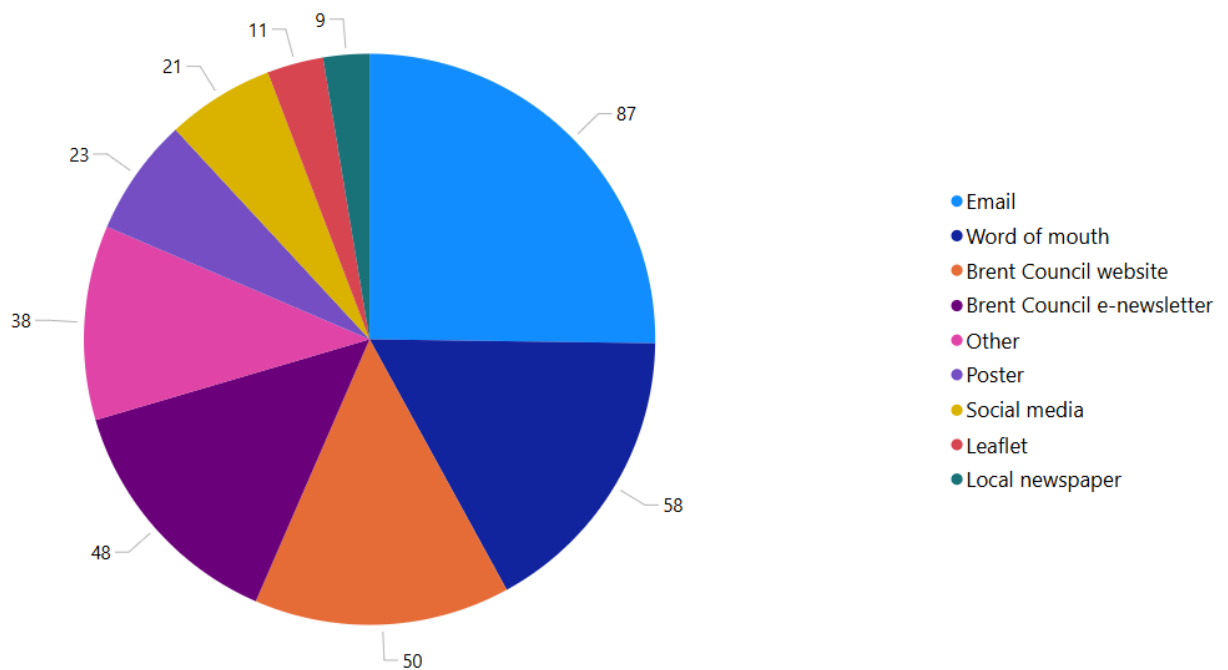


Respondents could optionally give information on the first part of their postcode, allowing for geographic analysis of responses. Of the **257** respondents who provided this information, the vast majority were Brent/London residents, though some responses came from further afield, including Milton Keynes and Norwich.



Respondents were also asked to give information about how they heard about the consultation. **305** respondents chose to answer this question and were able to select multiple options (and due to this, the responses will not add up to 100%). The largest portion of respondents, **87 (29%)** said they heard about the consultation through email, followed by **58 (19%)** heard about it through word of mouth, **50 (16%)** heard about it through the Brent Council website and **48 (16%)** heard about it through the Brent Council e-newsletter.

How did you hear about this consultation?



3.2 Stakeholders

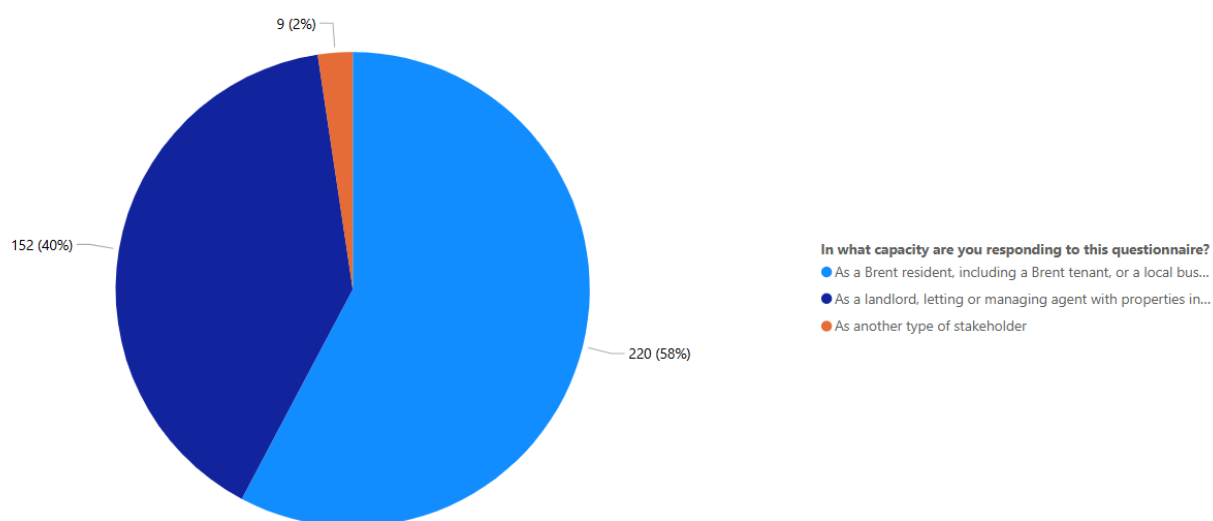
All respondents to the consultation were categorised into the following stakeholder groups:

- As a Brent resident or local business
- As a landlord, letting or managing agent with properties in Brent
- As another type of stakeholder

58% of respondents were residents or local businesses, **40%** were landlords or agents and **2%** were other stakeholders.

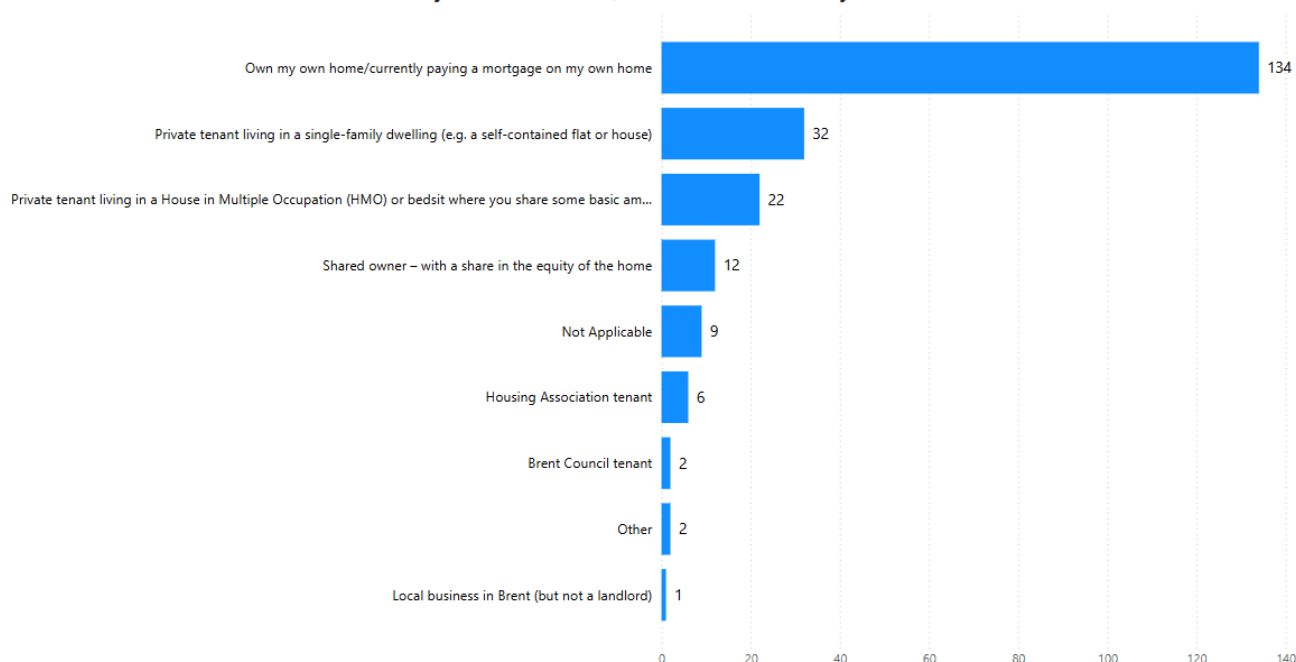
Respondents who stated they were a Brent resident or local business, or a landlord, letting or managing agent were then asked which description would best describe them.

In what capacity are you responding to this questionnaire?

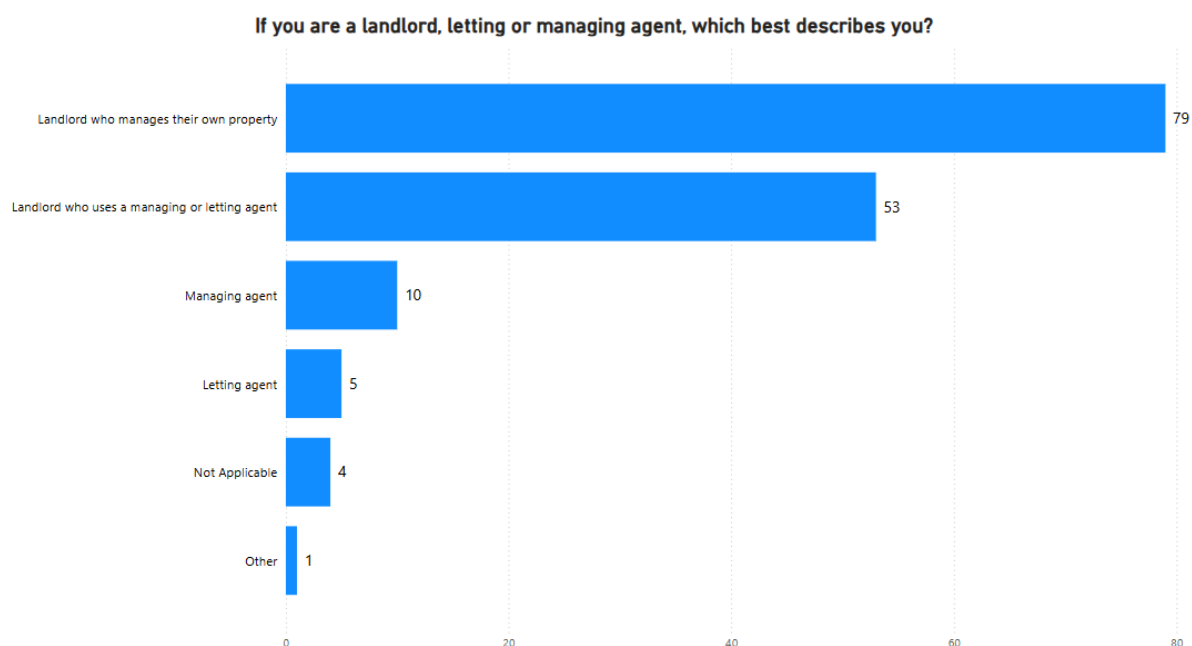


Of the **220** residents and local businesses who responded to this question, **146 (66%)** said they were an owner occupier or shared owner, **54 (25%)** said they were private tenants and **20 (9%)** said they were another type of resident or local business.

If you are a resident, which best describes you?



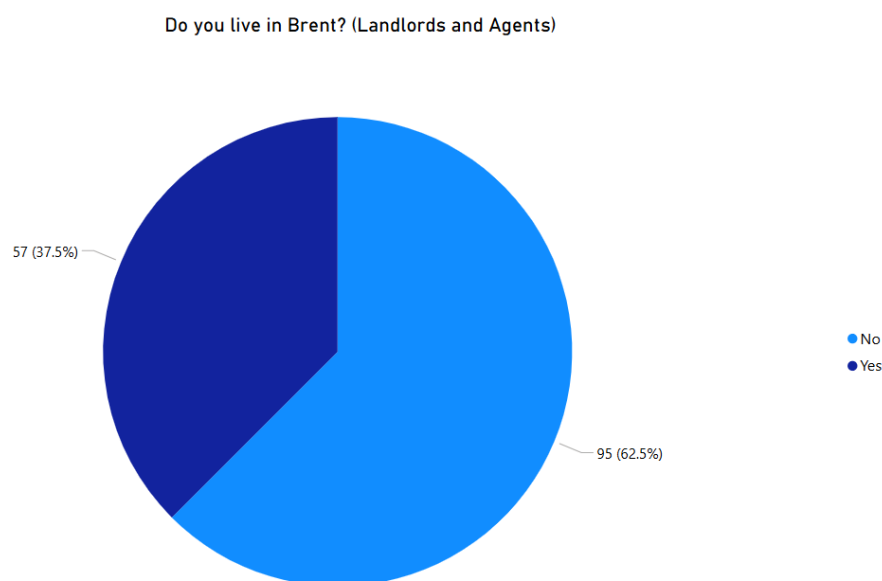
Of the **152** landlords, letting or managing agents who responded to this question, **79 (52%)** said they were a landlord who manages their own property, and **53 (35%)** said they were a landlord who uses a managing agent.



The sum of the resident capacities and landlord capacities exceeds the total number of responses; this is because some respondents have responded as both a landlord and a resident in the same submission. The range of respondents to the consultation shows a good representation of views from different stakeholder groups.

Landlords' relationship to Brent

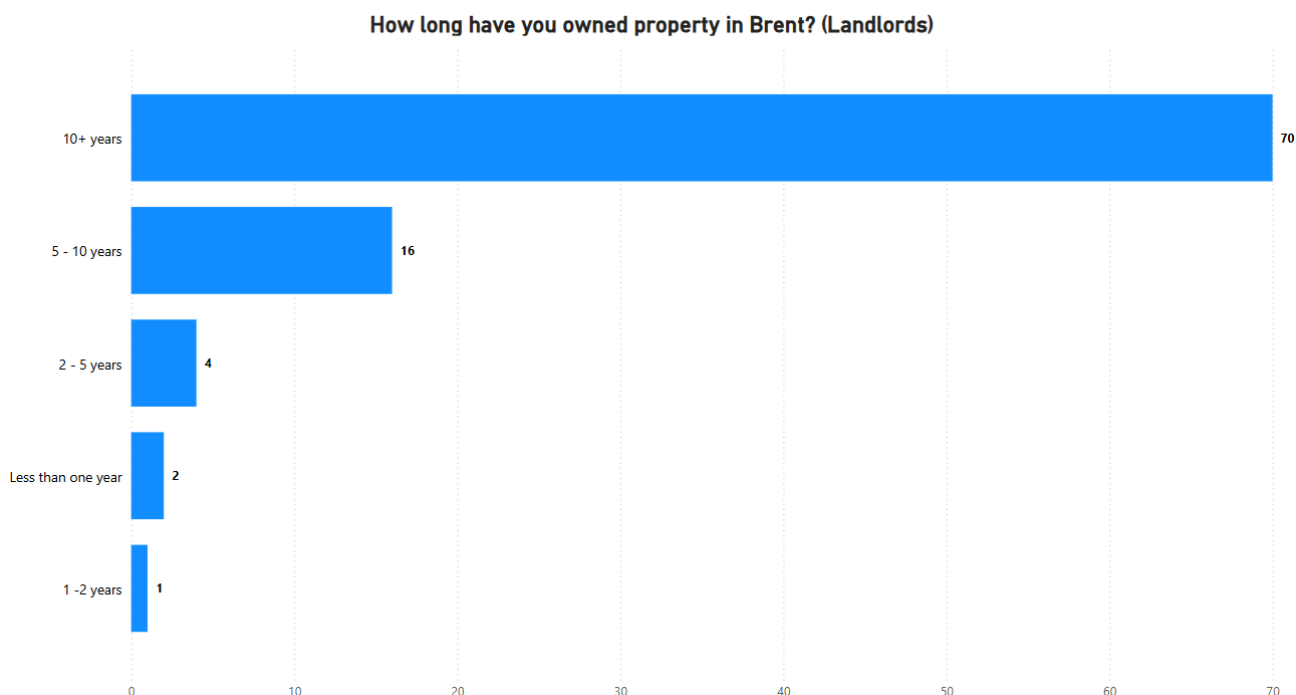
Landlords, letting or managing agents who responded to the consultation were asked if they lived in Brent. Of the **152** landlords, letting or managing agents who responded to this question, **57 (37%)** said they lived in Brent, and **95 (63%)** said they lived outside of Brent.



These results clearly indicate that the consultation reached landlords both within and outside of the borough.

Length of ownership

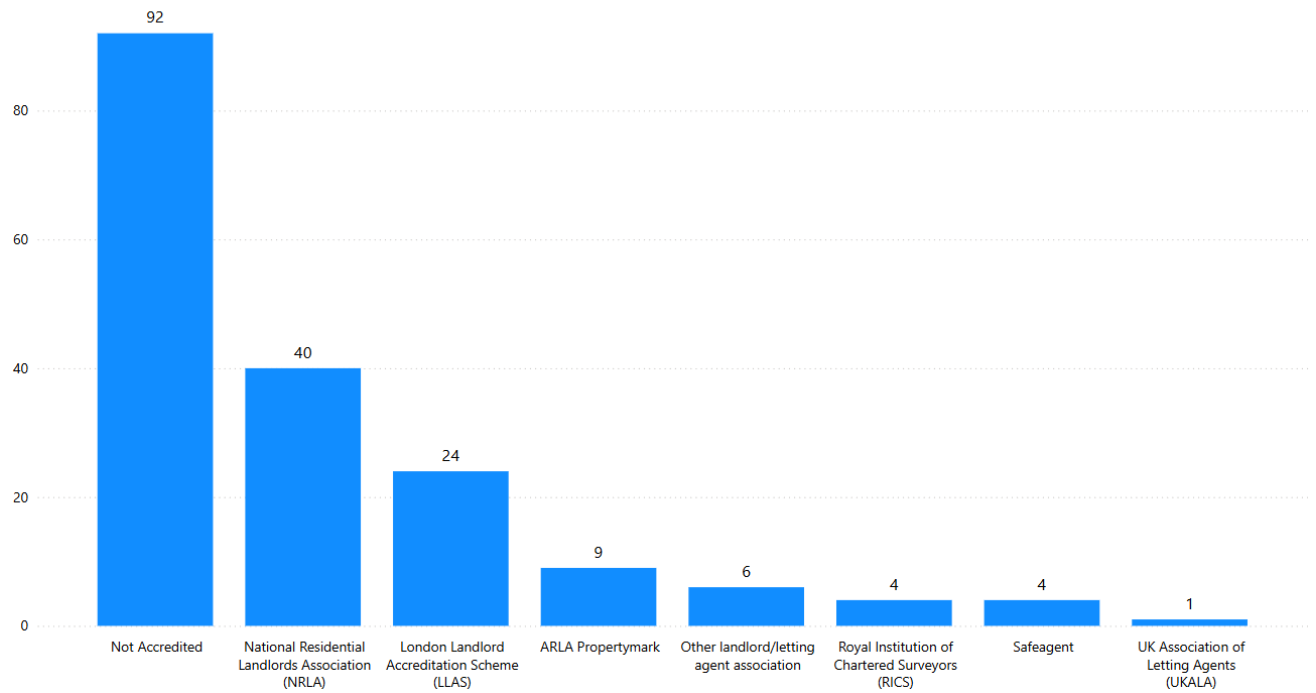
Landlords, letting or managing agents were also asked about how long they had owned property in Brent. The majority of landlords have owned property for more than 10 years.



Accreditation

Landlords, letting and managing agents were additionally asked whether they belonged to any accreditation schemes (including NRLA, LLAS, UKALA, Safeagent, ARLA Propertymark, RICS). Respondents were able to select multiple options, and, due to this, the responses will not add up to 100%. Of the 152 landlords, letting and managing agents represented by this questionnaire, **92 (61%)** said they were not accredited under any scheme, **40 (26%)** were accredited through NRLA, **24 (16%)** through LLAS and **24 (16%)** through all other landlord/letting agent associations.

Are you accredited or a member of any of the following?



3.3 Views on the proposed additional HMO licensing scheme

The council is proposing to introduce a further boroughwide additional HMO licensing scheme which would apply to all smaller HMOs not currently subject to the mandatory HMO licensing scheme. This section covers the responses regarding the council's proposals.

Responses between 10 March to 31 March

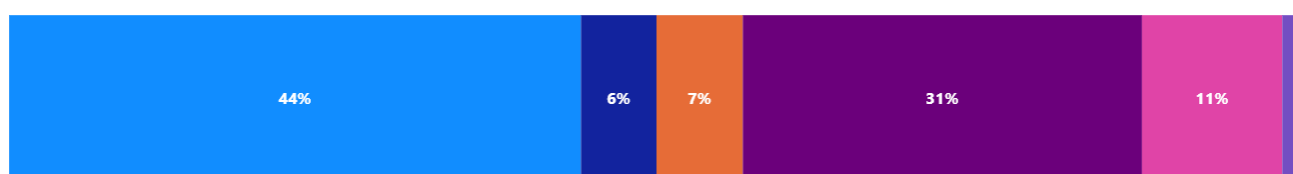
The council identified that prior to 1 April, the online version of the survey question 'To what extent do you agree or disagree with the proposal for a boroughwide additional HMO licensing scheme in Brent' contained a duplicate option for 'Strongly agree' instead of 'Strongly disagree'. This was corrected as soon as the issue was identified, and a notice was added to the consultation webpage. To ensure accurate feedback, the consultation period was extended by two weeks.

The feedback for this question during this time period is shown in the chart below. Of the 120 respondents who answered this question prior to 1st April, **50%** agreed with the proposal for an additional HMO licensing scheme. We have assumed that the 13 respondents who selected the second 'strongly agree' option (second-to-last, pink segment in chart) actually intended to disagree with the proposals. Therefore, prior to the 1 April, a total of **42%** disagreed with the proposal.

To what extent do you agree or disagree with the proposal for a boroughwide additional HMO licensing scheme in Brent?

Responses between 10/03 - 31/03

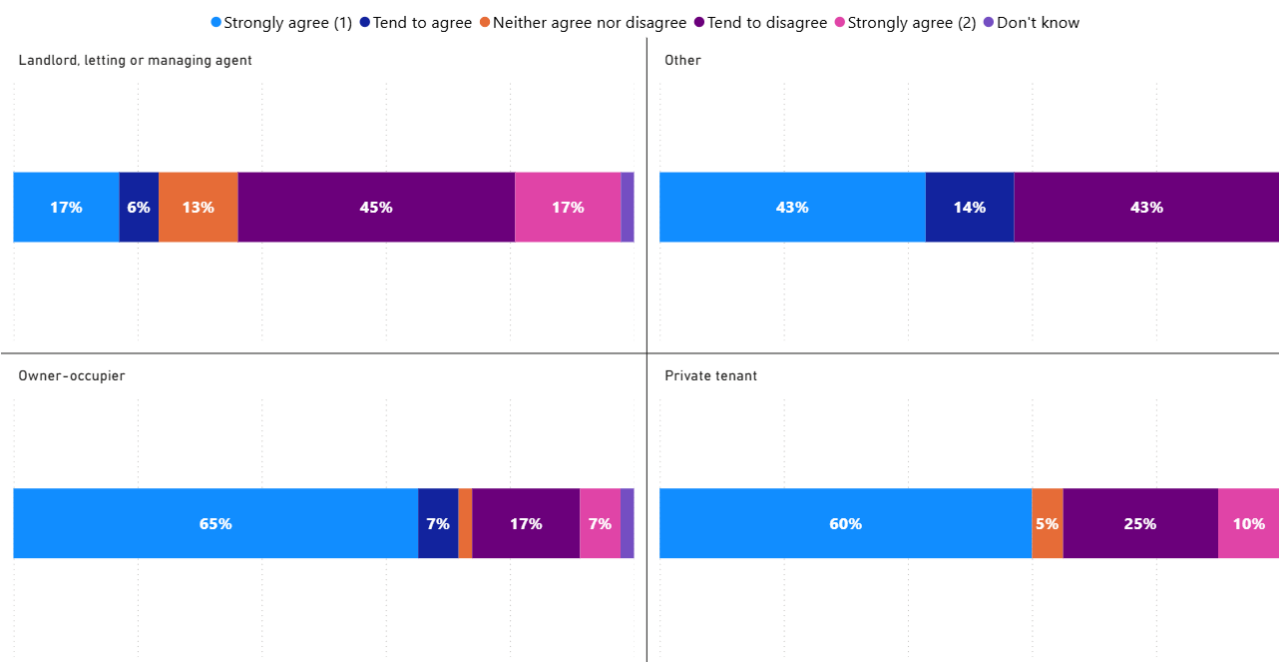
● Strongly agree (1) ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly agree (2) ● Don't know



Looking at the responses by stakeholder groups, opinions on the scheme proposal were split, with private tenants (**60%**), owner-occupiers (**72%**) and other stakeholders (**57%**) approving of the scheme overall, while **62%** of landlords, letting or managing agents disapproved

To what extent do you agree or disagree with the proposal for a boroughwide additional HMO licensing scheme in Brent?

Responses between 10/03 - 31/03



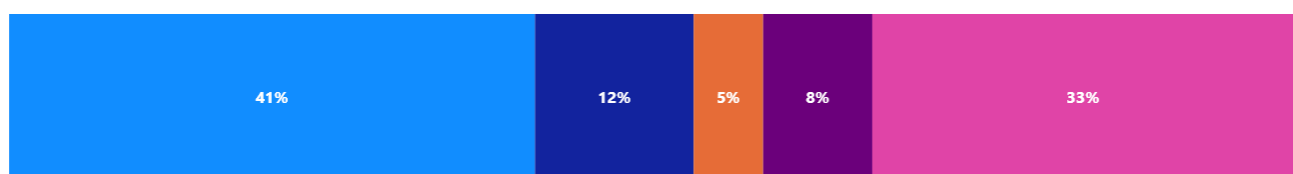
Responses between 1 April to 10 June

Of the 261 respondents who answered this question on or after 1st April (with the amended Likert scale), **53%** agreed with the proposal for an additional HMO licensing scheme, while **41%** disagreed.

To what extent do you agree or disagree with the proposal for a boroughwide additional HMO licensing scheme in Brent?

Responses between 01/04 - 10/06

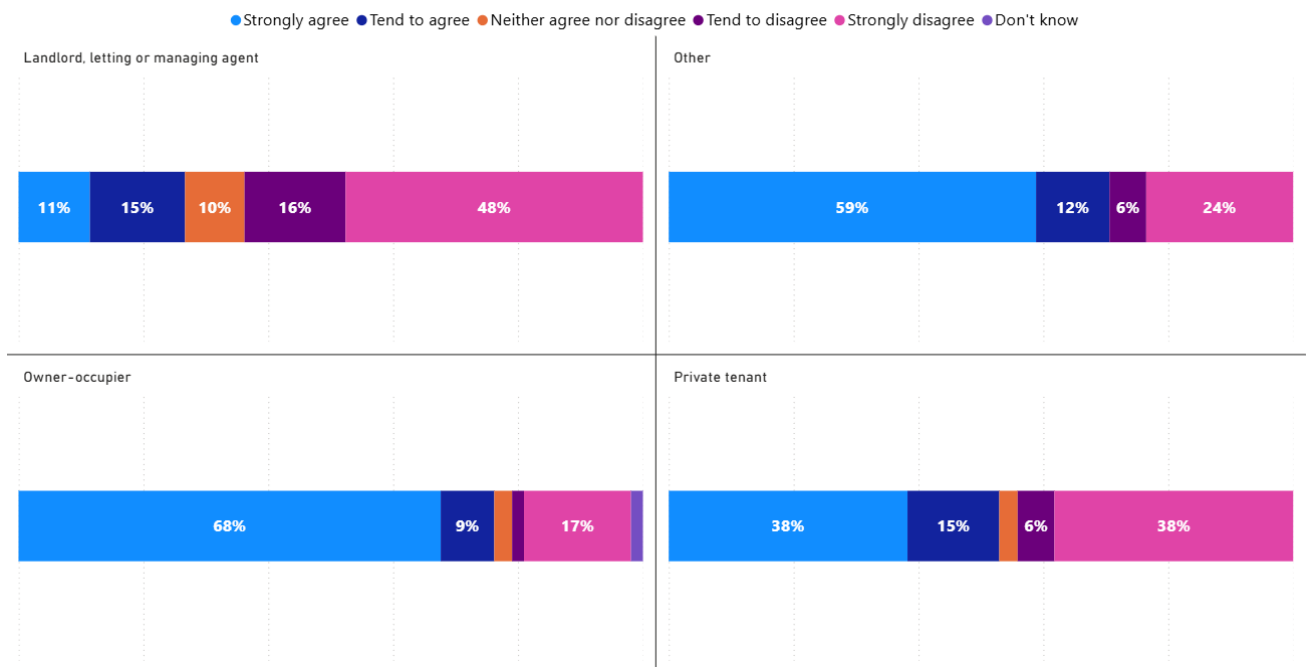
● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree ● Don't know



Similar to the first set of responses, the responses submitted on or after 1 April varied by stakeholder group. Again, private tenants (**53%**), owner-occupiers (**77%**) and other stakeholders (**71%**) approved of the scheme proposal, while **64%** of landlords, letting or managing agents disapproved.

To what extent do you agree or disagree with the proposal for a boroughwide additional HMO licensing scheme in Brent?

Responses between 01/04 - 10/06



3.4 Free text comments on the proposed schemes (for those in disagreement)

The free text comments for the questions asking respondents to explain why they disagreed with the proposed licensing scheme and if they had any further comments/considerations were analysed. The analysis looked at the responses by stakeholder type.

Landlords/agents

For landlords/agents, five major themes can be drawn out from the responses:

1. *Opposition to the scheme as a whole:* Many landlords and agents expressed strong disagreement with the proposed additional HMO licensing scheme, viewing them as unnecessary, burdensome, and a way for the council to generate revenue. They argued that existing laws and regulations are sufficient to address any issues with the property conditions and that the scheme unfairly penalises responsible landlords and will fail to remedy problems with rogue landlords.

'It's too bureaucratic and landlords are already selling up to the detriment of tenants who will have nowhere to live'

'It is taken too far and it is killer for good private landlords. This is a support to larger organisations who don't care about the quality of the housing. The government is looking for easy cash.'

2. *Concerns about increased costs and rents:* Many landlords and agents expressed concerns that the licensing scheme will lead to increased costs, which will ultimately be passed on to tenants in the

form of higher rents. They argued that this will exacerbate the already difficult housing shortage and make it more difficult for tenants to afford rental properties.

'Adds additional costs to landlords which will then be passed on to tenants in increased rents. Council already has sufficient powers to deal with any reported problems. Licensing is an unnecessary layer of additional bureaucracy and cost.'

'All additional costs will be passed to tenants, along with additional costs to cover extra administrative time.'

'By continuing to add more restrictions and objectives you are increasing the rents for tenants.'

3. *Focus on targeting rogue landlords:* landlords suggested that instead of implementing a blanket licensing scheme, the council should focus on targeting and penalising rogue landlords who are not complying with existing regulations. They argued that this would be a more effective approach to improving property conditions and protecting tenants and not penalise landlords who already have properties that meet high standards.

'Good landlords are already doing the right and correct things for their properties and tenants. Resources should be focused on targeting rogue landlords and not penalising all landlords with this additional extortionate cost.'

'Rogue landlords need to be targeted individually.'

'Pursue bad landlords - you could consider criminal convictions instead of making things more onerous for landlords who want to provide a safe and healthy home for their tenants and are struggling to afford to continue.'

4. *Utilise existing powers/legislation to target issues within the PRS:* some landlords and agents expressed that the current powers the council has to tackle problems with poor property conditions and ASB are sufficient.

'Government legislation is already in place to cover most licensing conditions, local licensing just doubles bureaucracy.'

'Use existing legislation where necessary. The council already has extensive powers to enforce property maintenance and anti-social behaviour and put the council's resources into specifically targeting problems and property.'

5. *Lack of faith in effectiveness of schemes and council management:* some landlords and agents expressed scepticism about the council's ability to effectively manage and enforce the licensing scheme. They cited examples of poor management of existing licensing schemes (both in Brent and other boroughs) and lack of inspections as evidence that the scheme may not achieve its intended goals.

'We don't see much enforcement action that actually improves the area.'

'The new licensing process feels more like an extra tax than anything else. There are very little checks and the cost is very high.'

'Licensing has not seemed to have changed much in the borough since it launched in 2017.. it does not support decent landlords, and we do not get the service required for the fees we are paying!'

Residents/local businesses

For residents/local businesses, similar themes were evidenced, with a greater emphasis on increased costs for tenants:

1. *Concerns about increased costs:* many respondents expressed concerns that the proposed licensing scheme would lead to increased costs for landlords which would ultimately be passed on to tenants in the form of higher rents. They argued that this would exacerbate the already high cost of living in Brent and during a cost-of-living crisis.

'It is an extra cost to landlords who will inevitably pass it on to tenants and the effect it will have will be to raise rents and make housing even more difficult to access.'

'All additional costs will be passed to tenants, along with additional costs to cover extra administrative time.'

2. *Focus on enforcement of existing laws:* several respondents suggested that the council should prioritise enforcing existing laws and regulations rather than implementing a new licensing scheme. They argued that there are already measures in place to address poor housing conditions and ASB and that the council should focus on effectively enforcing these laws.

'Legislations already exists in terms of fire safety, building regulations and regulation of the number of people living in a house.'

'Government legislation is already in place to cover most licensing conditions, local licensing just doubles bureaucracy.'

3. *Criticism of Brent Council's own housing management:* many respondents criticised Brent Council for not adequately maintaining its own social housing properties. They argued that the council should address the issues within its own housing stock before targeting issues within the PRS.

'you are risking my landlord increasing the rent and what for most small HMO's dont need your help Blocks of council flats or even my neeighbour that is a Housing Assoc property is more poorly managed and anti social behavior esp the front garden'

'Only controlling private housing isn't a solution. Brent has vast housing stock made-up of council/housing association properties where standards are very poor and not under control.'

4. *Impact on rental market and housing supply:* some respondents expressed concerns that the licensing scheme would discourage landlords from renting out their properties, leading to a decrease in the availability of rental housing. They argued that this would further worsen the housing crisis in Brent.

'It will add to housing costs and reduce the supply of rental properties'

'These additional licensing in Brent (and other paces) have resulted in less landlords, less choice and competition for tenants and higher rents year on year.'

5. *Need for targeted approach:* several respondents suggested that the licensing scheme should be more targeted, focusing on specific problem areas or landlords rather than applying to all properties. They emphasised the importance of addressing the issues caused by a minority of landlords without burdening all landlords with additional costs and regulations.

'Stop targeting landlords and only look at target areas like Wembley Central & Harlesden'

'There is no value in having a licence to good landlords whose tenants-are happy - brent council know bad landlords and properties in disrepair including their own properties- they should fix these rather than tax landlord of single well maintained property. Collect fines instead from bad landlords and inspect properties in a manner like food 5. Star venues'

3.5 Views on the proposed additional HMO licensing scheme fee

The consultation asked respondents for their views on the proposed licence fee for the proposed additional HMO licensing scheme. Information about the proposed licence fee was provided within the consultation documents.

Respondents were asked how reasonable they feel the proposed additional HMO licence fee of £1040 for a five-year licence is.

What are your views on the proposed additional HMO licensing fee?

● Too high ● Right level ● Too low ● Don't know

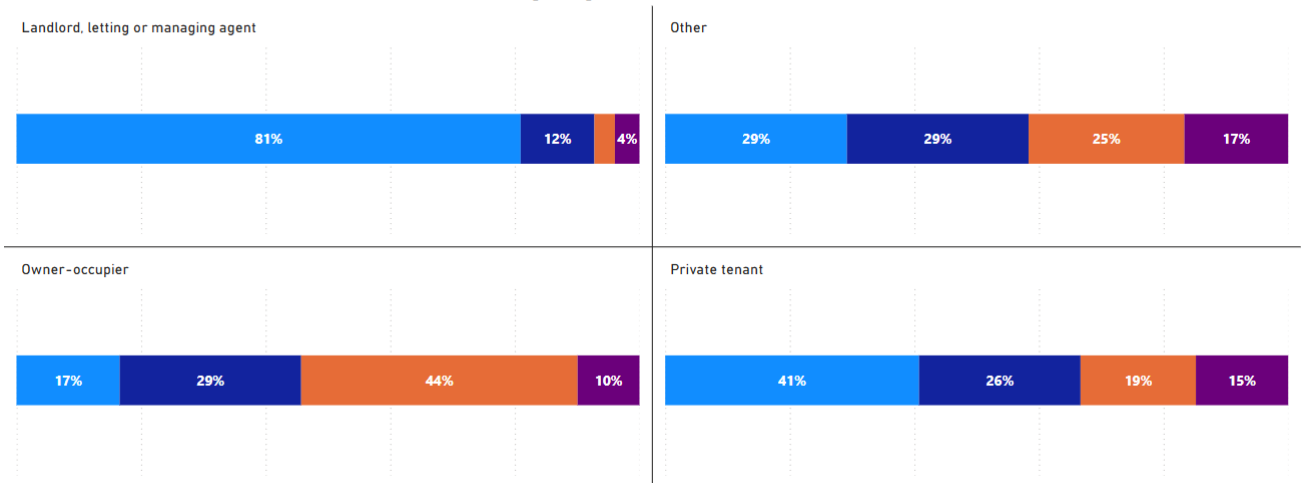


Of the **381** respondents who answered this question respondents, the largest proportion, **46%**, said that they thought that the fee is too high.

Opinions on the fee varied considerably by stakeholder group. Landlords, letting and managing agents were the most consistent in responding that the fee is too high, with **81%** selecting this option; the “Other” stakeholder group had an equal portion, **29%**, thinking the fee was too high and about the right level, **41%** of private tenants responded that the fee was too high, while **44%** of owner-occupiers responded that the fee was too low.

What are your views on the proposed additional HMO licensing fee?

● Too high ● Right level ● Too low ● Don't know



3.6 Views on the proposed additional HMO licensing scheme discount

The consultation asked respondents for their views on the proposed licence fee discount. Information about the proposed licence fee discount was provided within the consultation documents.

Respondents were asked how reasonable they feel the proposed additional HMO licence fee discounts of £40 for LLAS accredited landlords was.

What are your views on the proposed additional HMO licensing discount?

● Too high ● Right level ● Too low ● Don't know

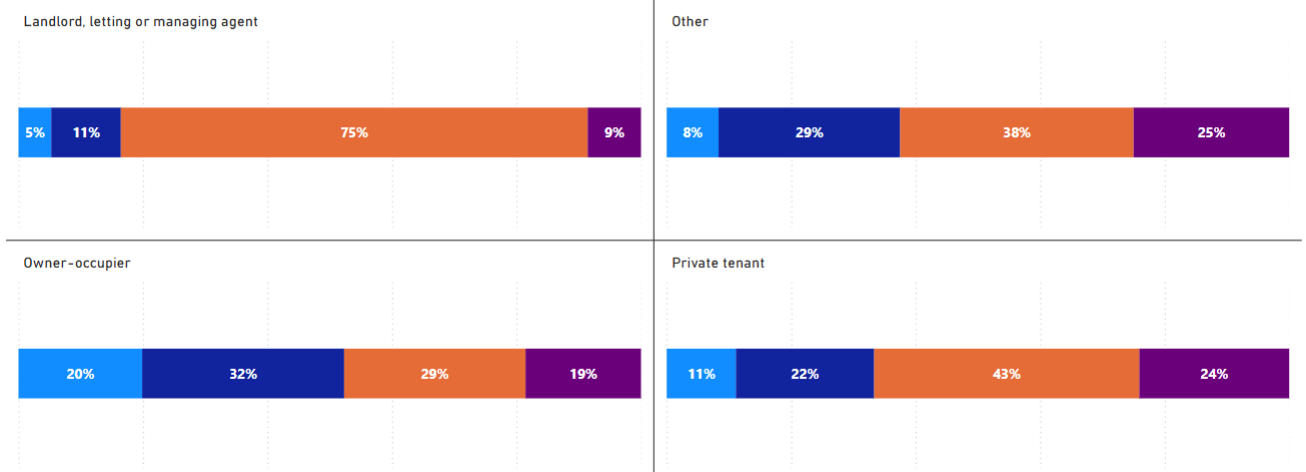


Of the **381** respondents who answered this question, the largest proportion, **50%**, said that they thought that the discount is too low.

Opinions on the fee varied by stakeholder group. The largest proportion of landlord, letting and managing agents (**75%**), 'Other' stakeholders (**38%**) and private tenants (**43%**) all indicated they believed the discount to be too low, while owner-occupiers were split, with **32%** saying it was about right and **29%** saying it was too low.

What are your views on the proposed additional HMO licensing discount?

● Too high ● Right level ● Too low ● Don't know



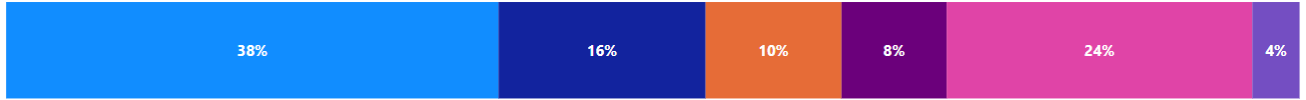
3.7 Views on the proposed additional HMO licensing scheme conditions

The consultation asked respondents for their views on the proposed additional HMO licence conditions. Information about the licence conditions was provided within the consultation documents.

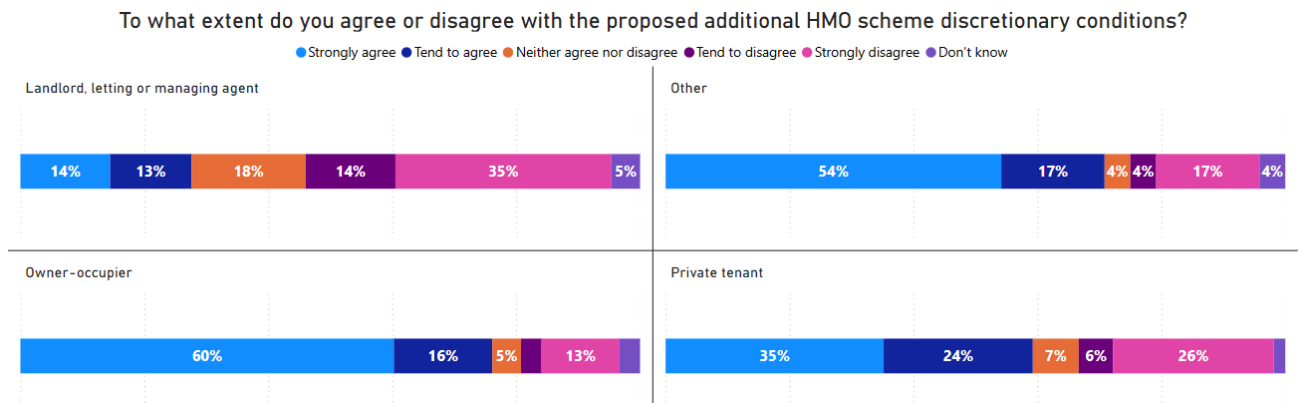
Of the **381** respondents who answered this question, the majority of respondents, **54%**, agreed with the proposed licence conditions, while **32%** of respondents disagreed.

To what extent do you agree or disagree with the proposed additional HMO scheme discretionary conditions?

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree ● Don't know



Looking at the responses by group, landlords, letting and managing agents are largely opposed, with **49%** disagreeing with the additional HMO licensing conditions. Private tenants (**59%**), owner-occupiers (**76%**) and 'Other' stakeholders (**71%**) are all majority in favour of the additional HMO licensing conditions.



Free text comments regarding the additional HMO licence conditions

The free text comments for the questions asking respondents to explain why they disagreed with the proposed additional HMO licence conditions were analysed. The analysis looked at the responses by stakeholder type.

Landlords/agents

For landlords/agents, several themes emerged, but especially the notion that the current regulations and requirements are enough and that additional conditions are unnecessary.

1. *Excessive burden:* many landlords and agents argue that the proposed additional HMO licensing conditions are excessive, place an unfair burden on responsible landlords (and in certain cases should be the responsibility of the tenant) and should not go further than national law.

'It's too bureaucratic and landlords are already selling up to the detriment of tenants who will have nowhere to live'

'Brent has overstepped its legal authority by a long way by trying to impose non-statutory standards on landlords.'

'The discretionary conditions will apply a prohibitive burden of costs on landlords which will likely make then letting of some properties no longer viable and therefore make worse the housing crisis. The mandatory regulations that are already in place are sufficient.'

2. *Impact on rents and housing supply:* landlords expressed concerns that the additional costs associated with meeting the additional HMO licensing conditions will ultimately be passed on to tenants in the form of higher rents or resulting in housing shortages from landlords leaving the market. They believed that this will further exacerbate the affordability crisis in the rental market.

'Not necessary. Laws already in place to combat poor accommodation issues. Already a shortage or rental properties in London - this makes it harder for la floes and therefore reduces properties available for rental.'

'It's too bureaucratic and landlords are already selling up to the detriment of tenants who will have nowhere to live'

Residents/local businesses

Similarly to the responses from landlords/agents, a common theme was that the licence conditions are covered by existing law. There was also a concern about the impact on tenants and that added requirements could lead to increases in rent and decrease in supply.

1. *Focus on existing regulations:* respondents expressed their disagreement, in many cases questioning the need for additional regulations and suggested that existing laws and enforcement should be sufficient

'The requirements are already stated in law. Another layer of expensive bureaucracy is not needed'

'There is enough conditions in the system at the moment. The Council should be looking at its power to educate, regulate and inspect rather than additional conditions and costs on all concerned.'

2. *Impact on tenants:* several respondents raised concerns about the potential negative impact on tenants, such as increased rents, reduced housing options, and difficulties in obtaining references or finding accommodation due to stricter regulations

'Mandatory conditions are already enshrined in legislation, imposing a license to all landlords will result in higher rents + landlords selling there letting properties and less housing available in the city. It is a completely counter productive measure.'

'pushing more private landlords with measures like these had lead to the housing crisis and higher rents, driven by local councils like brent'

3. *Enforcement*: some respondents raised concerns of the council's efficacy to enforce the scheme and questioned its effectiveness.

'These are only effective if Brent Council actually enforces them , but it's very apparent that this is not happening at present.'

'I also repeat enforcement of regulations is key and not happening.'

3.8 Views on the proposed additional HMO licensing scheme objectives

The consultation asked respondents for their views on the proposed licensing scheme objectives. Information about the licensing scheme objectives was provided within the consultation documents.

To what extent do you agree or disagree with the proposed additional HMO licensing scheme objectives?

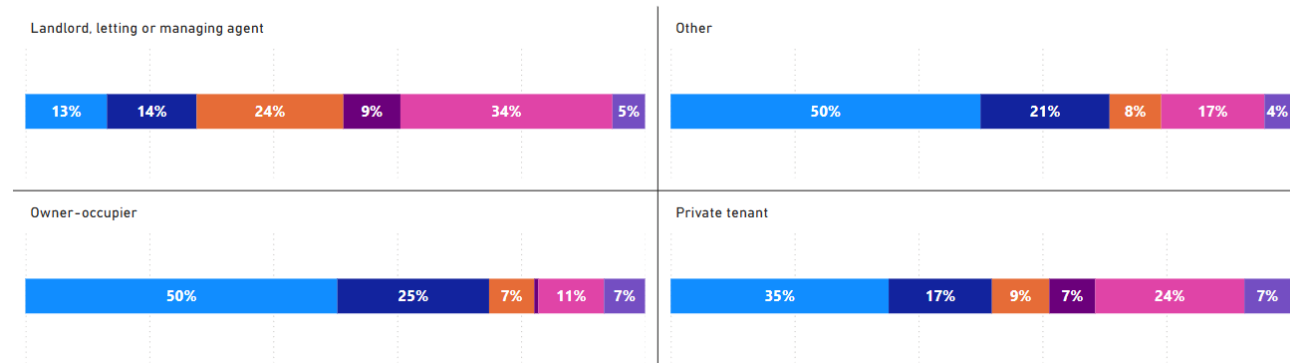
● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree ● Don't know



Of the **381** respondents who answered this question, a majority of respondents, **52%**, agreed or strongly agreed with the proposed licensing scheme objectives, while **27%** of respondents disagreed or strongly disagreed.

To what extent do you agree or disagree with the proposed additional HMO licensing scheme objectives?

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree ● Don't know



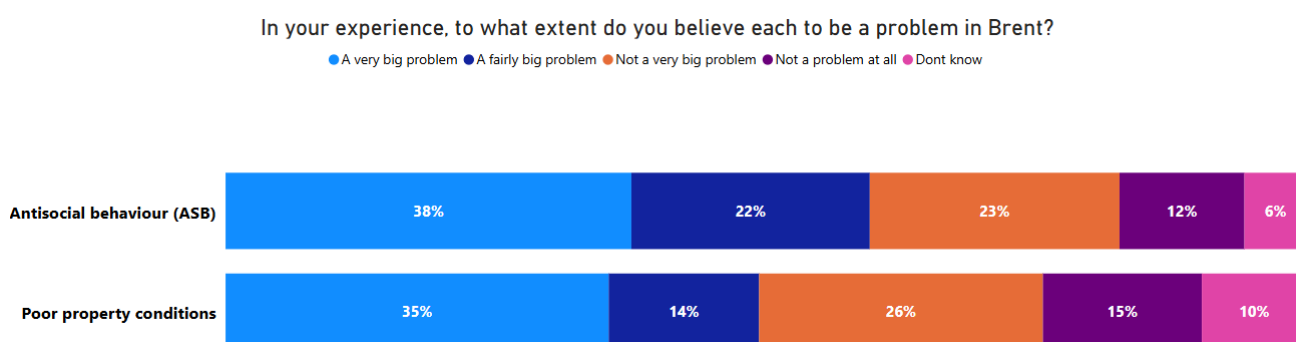
Looking at the responses by group, landlords, letting and managing agents are largely opposed, with **43%** disagreeing with the additional HMO licensing scheme objectives. Private tenants (**52%**), owner-occupiers (**75%**) and 'Other' stakeholders (**71%**) are all majority in favour of the additional HMO licensing scheme objectives.

3.9 Views on issues in Brent's PRS

Respondents to the survey were asked their opinion of issues relating to ASB and poor property conditions in private rented properties in the borough.

Respondents were asked to what extent they believed that poor property conditions and ASB are problems in their local area of Brent.

381 respondents in total answered this question.



ASB (381 responses)

60% of all respondents thought that ASB was a fairly big or very big problem as opposed to **35%** who thought it was not a very big problem or not a problem at all.

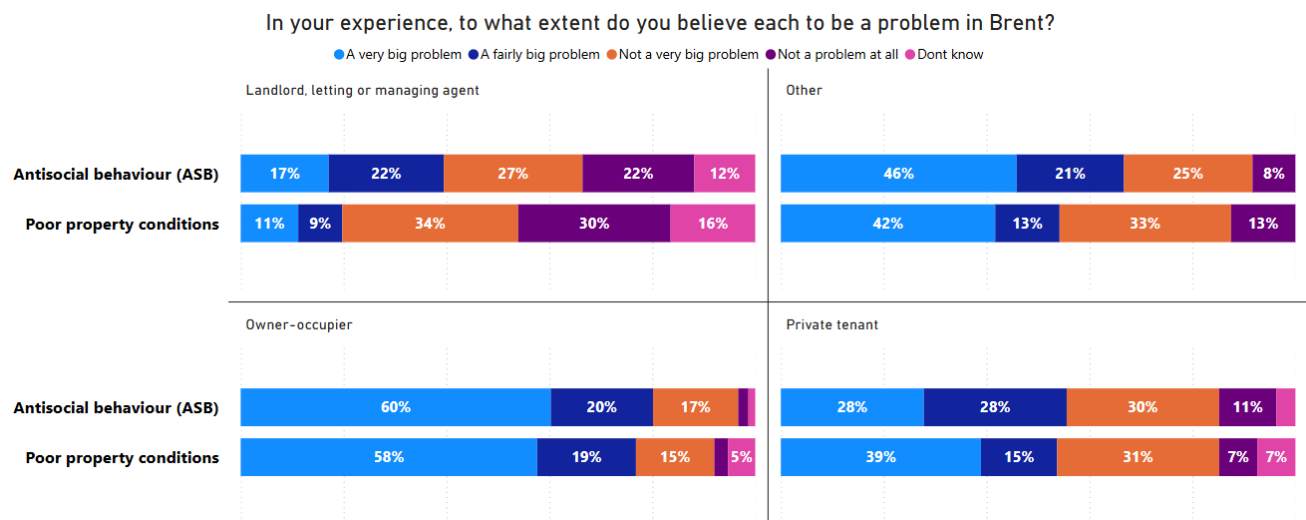
When looking at the responses by stakeholder group, as can be seen in the graphs below, there is great polarity between landlords, letting and managing agents and all other stakeholders; where **49%** of landlords, letting and managing agents viewed ASB as not a very big problem or not a problem at all, **80%** of owner-occupiers, **67%** of 'Other' stakeholders and **56%** of private tenants viewed ASB as a fairly big or very big problem.

Poor property conditions (381 responses)

The largest proportion of respondents, **49%**, stated that they believed poor property conditions were a very big or fairly big problem. **41%** believed they were not a very big problem or not a problem at all.

Similar to respondents' views on ASB relating to the borough's PRS, there is also polarity between landlords, letting and managing agents and the other stakeholder groups when considering poor property conditions; where only **20%** of landlords, letting and managing agents viewed poor property conditions as a fairly big or very big problem, in contrast, **54%** of private tenants, **55%** of

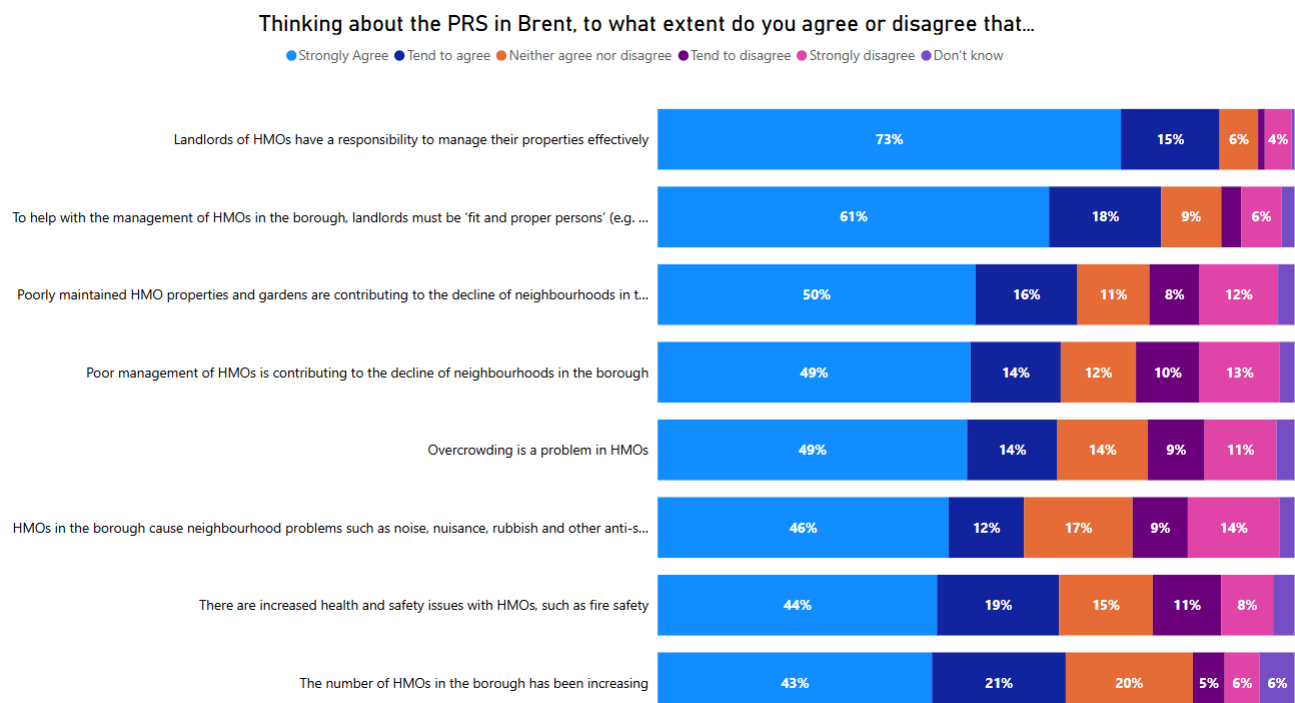
'Other' stakeholders and **77%** of owner-occupiers viewed poor property conditions as a fairly big or very big problem.



3.10 Views on the PRS in Brent

Respondents were also asked about their views on the PRS in Brent as a whole.

381 respondents in total answered this series of questions.



Landlord responsibility (381 responses)

When asked if landlords of HMOs have a responsibility to manage their properties effectively, the overwhelming majority of respondents, **88%**, either agreed or strongly agreed.

'Fit and proper' person (381 responses)

When asked if landlords of HMOs should be 'fit and proper' persons (e.g. have proper management or financial arrangements in place and not have convictions for certain types of offences), again, an overwhelming majority, **79%**, either agreed or strongly agreed.

Poorly maintained properties (381 responses)

When asked whether poorly maintained HMO properties were contributing to the decline of some areas in Brent, a majority of respondents, **66%** agreed or strongly agreed.

Poorly managed properties (381 responses)

When asked whether poor management of HMO properties was contributing to the decline of some areas in Brent, a majority of respondents, **63%** agreed or strongly agreed.

Overcrowding (381 responses)

When asked whether there was an issue with overcrowding in HMO properties in the borough, a majority of respondents, **63%** agreed or strongly agreed.

Neighbourhood problems such as noise, nuisance, rubbish and other ASB (381 responses)

When asked whether HMO properties cause neighbourhood problems, a majority, **58%**, agreed or strongly agreed.

Health and Safety Issues (381 responses)

When asked whether there were increased health and safety issues with HMO properties in the borough, a majority of respondents, **63%** agreed or strongly agreed.

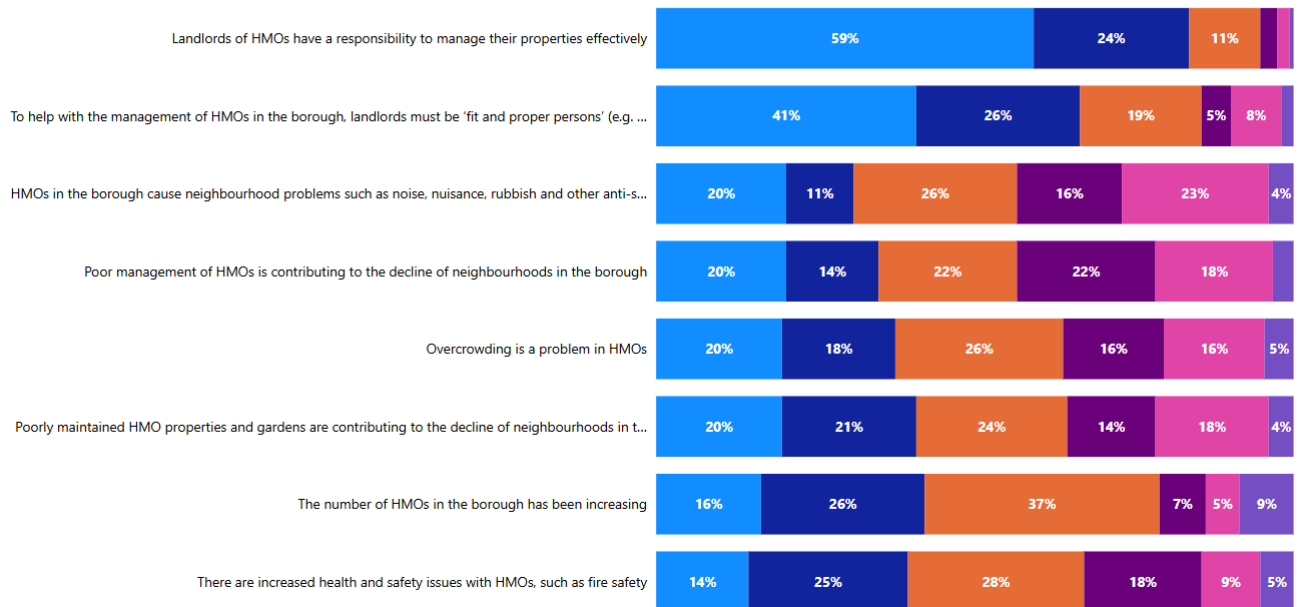
The number of PRS properties (381 responses)

When asked whether the number of private rented properties in the borough has been increasing, a majority of respondents, **64%** agreed or strongly agreed.

Similarly, when looking at responses by stakeholder group, there is a contrast between landlords, letting and managing agents' perceptions of HMO properties in Brent and that of the other three stakeholder groups. The stakeholder breakdown is shown in the graphs below.

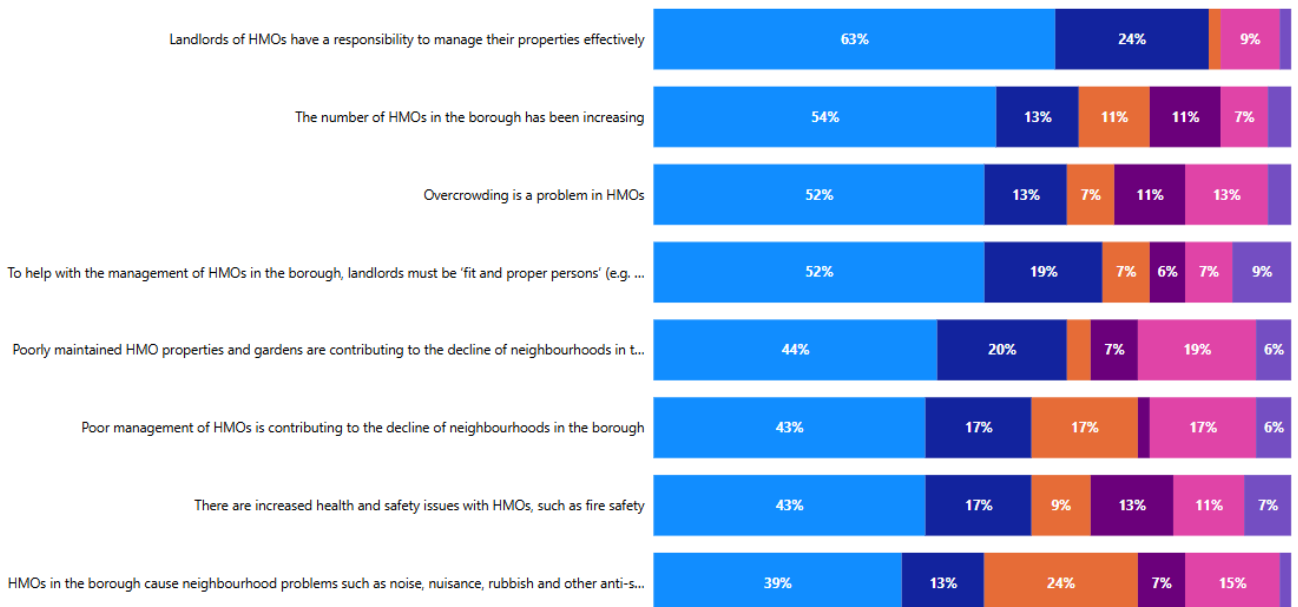
As a landlord, letting or managing agent, to what extent do you agree/disagree with the following?

● Strongly Agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree ● Don't know



As a private tenant, to what extent do you agree/disagree with the following?

● Strongly Agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree ● Don't know



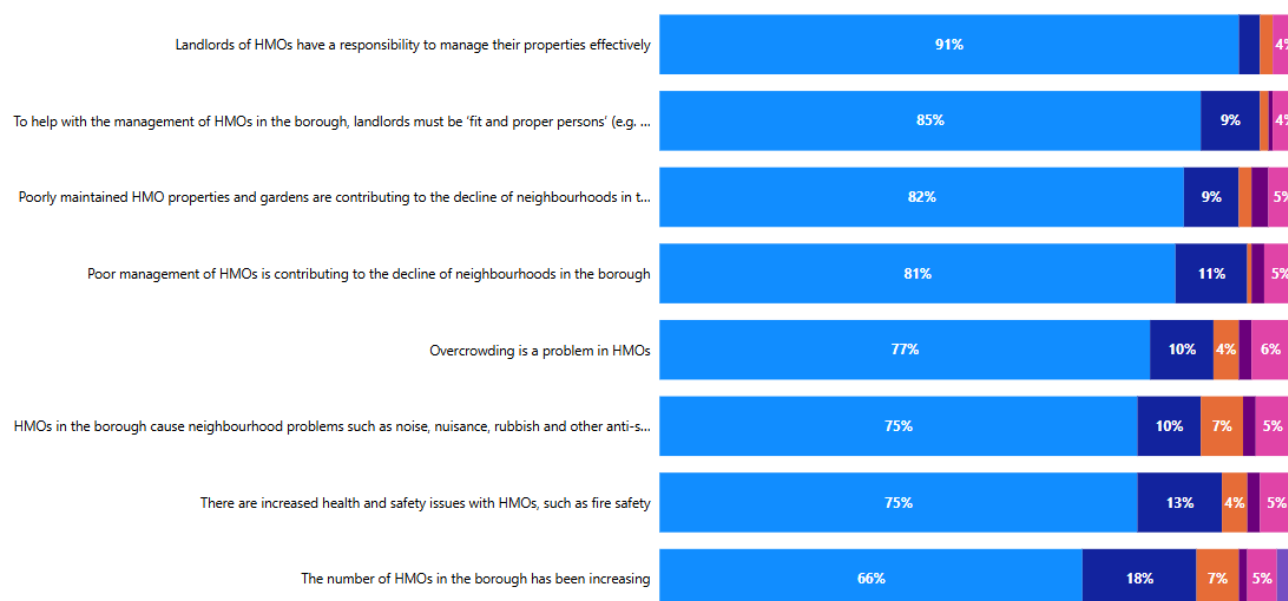
As another type of stakeholder, to what extent do you agree/disagree with the following?

● Strongly Agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree ● Don't know



As an owner-occupier, to what extent do you agree/disagree with the following?

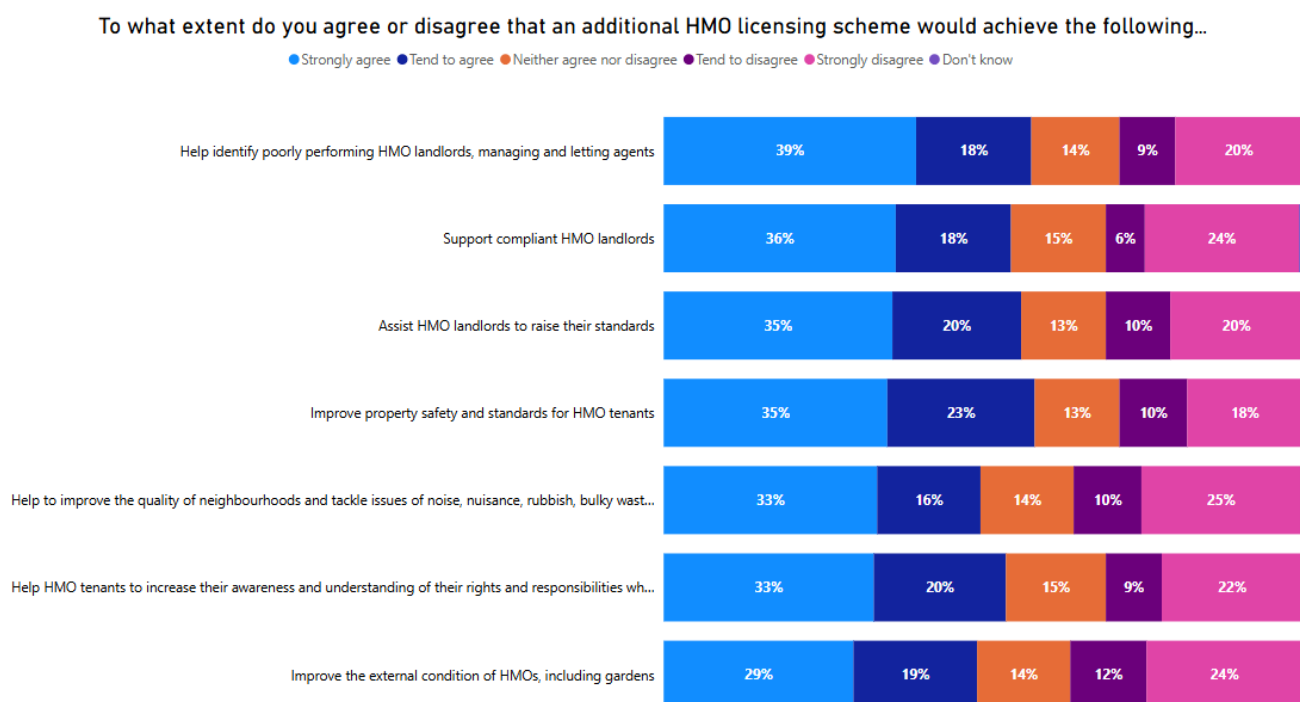
● Strongly Agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree ● Don't know



3.11 Views on additional HMO licensing scheme outcomes in Brent

Respondents were also asked about their views on whether they thought an additional HMO licensing scheme in Brent would help to achieve certain outcomes.

381 respondents in total answered this question.



The questions asked to what extent they agreed that an additional HMO licensing scheme in Brent would help to achieve the following outcomes:

Help identify poorly performing HMO landlords, managing agents and letting agents (381 responses)

57% of respondents agreed or strongly agreed, while **29%** disagreed or strongly disagreed.

Support compliant HMO landlords (381 responses)

54% of respondents either agreed or strongly agreed, while **30%** said they disagreed or strongly disagreed.

Assist HMO landlords to raise their management standards (381 responses)

55% of respondents either agreed or strongly agreed, while **30%** said they disagreed or strongly disagreed.

Improve property safety and standards for HMO tenants (381 responses)

58% of respondents either agreed or strongly agreed, while **28%** said they disagreed or strongly disagreed.

Help to tackle issues of neighbourhood problems such as noise nuisance, rubbish and other ASB (381 responses)

49% of respondents either agreed or strongly agreed, while **35%** said they disagreed or strongly disagreed.

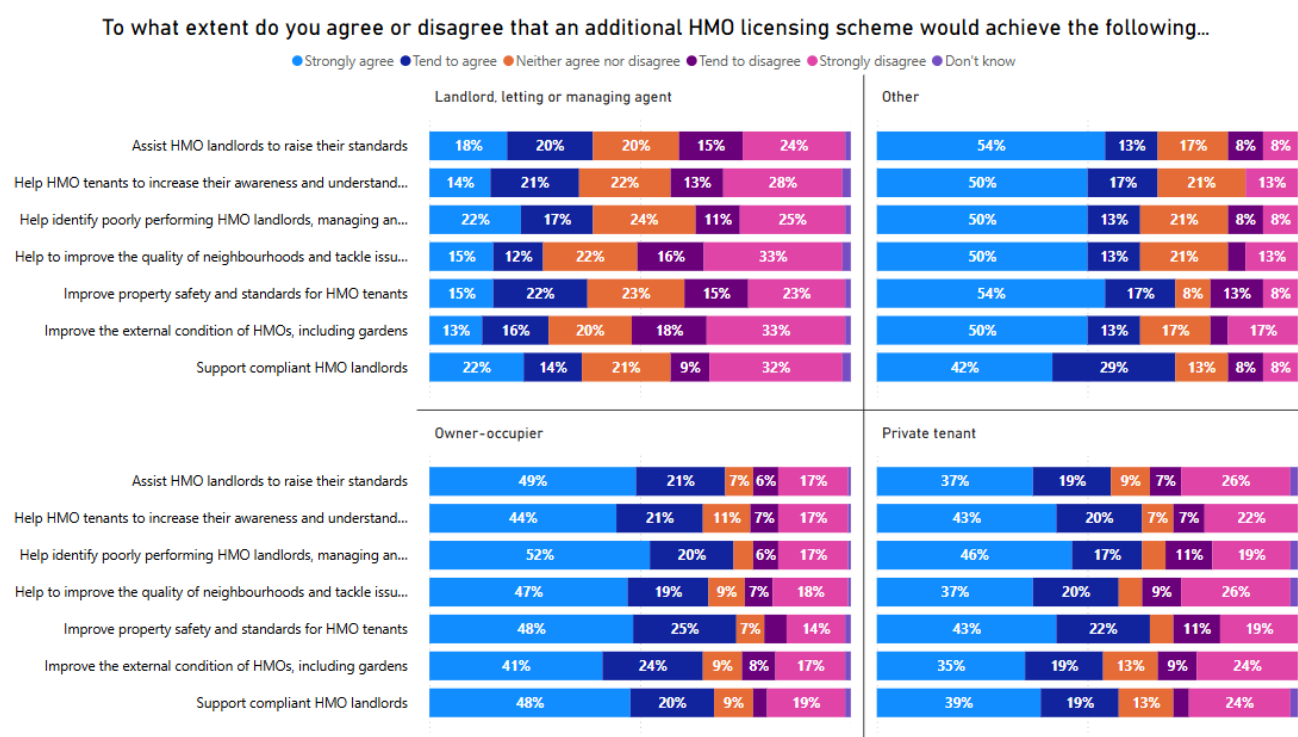
Help HMO tenants to increase their awareness and understanding of their rights and responsibilities when living in the PRS (381 responses)

53% of respondents either agreed or strongly agreed, while **31%** said they disagreed or strongly disagreed.

Improve the external condition of HMOs, including gardens (381 responses)

48% of respondents either agreed or strongly agreed, while **36%** said they disagreed or strongly disagreed.

As is the case with the majority of questions, there is polarity between the views of landlords, letting and managing agents and those of the other stakeholder groups. The stakeholder breakdown is shown in the graphs below.



3.12 Alternative solutions, other comments and considerations

Open text responses were also requested to gather additional comments, and to determine whether stakeholders felt that there was anything further that the council should consider:

Some respondents suggested alternative approaches to improving housing standards and ASB in HMO properties, such as focusing on better management and enforcement of existing regulations. They emphasised the need for a more balanced and targeted approach that does not penalise good

landlords or deter investment in the rental market. A major theme was that the council should focus on building new homes and helping to make renovations to existing properties easier.

1. Reduction in number of HMOs: many respondents expressed a negative view of HMOs overall and requested either a reduction in the number of HMOs in the borough or limits to the number of HMOs.

'Ensure HMO's are not centred in specific areas (Harlesden being a bit of a dumping spot).'

'HMO's should be banned and has no place in society as new people coming and going is a safety and security risk for locals who have lived in the area for 40yrs like me.'

'We need to reduce the number of HMOs in the area and increase enforcement of the regulations, it is becoming a real issue for many residents.'

2. Protection, education and support: there was a call for better support for both landlords tenants, including better communication of information regarding private rentals more targeted inspections and enforcement for the worst properties.

'Regulate, Educate and provide financial support for struggling landlords and tenants.'

'Raising awareness amongst tenants (presumably by raising awareness amongst all residents - but perhaps particularly social housing tenants) about their rights to quality housing, including making it easier for them to make complaints without threat of eviction, and perhaps making it easy for them to have their homes inspected if they feel there's a problem.'

'make tenants aware of their rights to complain and the legal requirements of landlords such as fire assessments epc's gas safety etc these are all legal requirements set by the government NOT Brent'

3.13 Views supporting the proposed additional HMO licensing scheme

It is worth noting that, although there were a number of free text questions inviting written responses, these were only when respondents were in disagreement or had alternative ideas. While the majority of respondents expressed agreement with the proposed scheme, the free text comments these respondents left were primarily constructive ideas for improvements and additions to the proposed scheme. There were however many positive comments about the scheme. Some of these are listed below:

'This is an excellent initiative - well done Brent. Irresponsible landlords need to be forced to fit and proper landlords.'

'this is such a huge area of focus - i'm really happy brent are addressing it. there needs to be further regulation'

'I am fully agree with HMO license it makes safe housing for teannat and some tax income for Brent'

'I think these proposals are sensible, however the problem will be with Brent Council's enforcement of them. The enforcement of waste management is non-existent and has been cut back in successive budget reduction rounds and the whole thing will fail. So you need to build in enforcement measures and funding and commitment to this for years and years to come to make this work and not fail.'

4. Public meetings and written responses

Brent Council held two virtual public forums, an in-person Landlord Forum and four in-person drop-in sessions, to provide information about the proposed schemes and to gather feedback from stakeholders. Feedback was also gathered through formal written responses. Below is a summary of the key themes that came out of the forums and the written submissions.

Council officers also responded to email queries that were sent as part of the consultation.

4.1 Public online forums

The council, in conjunction with Cadence Innova, held two meetings aimed at engaging with landlords, agents and residents, to make them aware of the consultation and to gather their feedback. There was an online meeting (via Microsoft Teams) which was held on **30 April 2025** with **16** attendees (the actual number of attendees fluctuated during the meeting as attendees joined late or left early), and a further virtual event held on **21 May 2025**, with **38** attendees.

Council officers were present at every public forum. Following on from a presentation about the proposals, the majority of the meeting was used to undertake a question-and-answer session. Attendees had the opportunity to express their views and ask questions about the proposals. They were able to highlight areas requiring clarification and suggest matters for the council officers to consider. During each public forum, council officers attempted to address all questions posed by attendees, or directed them to the consultation documents for further information (often when there were specific questions about the proposed licence conditions, fees etc).

The main themes of the questions and views expressed were as follows, categorised by theme:

Financial Transparency and Public Accountability

Does LLAS help the council financially?

Would it not help the wider public by publishing financial and objective achievements, maybe on the council website?

Payment Flexibility & Engagement

Has there been any thought given to the application fee payment method? For ongoing connection, a monthly DD similar to Council Tax would help both parties.

Equity of Accredited Landlord Discount

The £40 discount given to accredited LLAS members - what are your thoughts on extending this to landlords who are members of other larger associations such as NRLA?

Oversight of Council and Housing Association Properties

Properties not linked to the schemes are council and housing association properties, correct? Has there been any plan to improve these market?

Other

Does the council have any plan to reduce HMO properties?

4.2 Written representations

During the consultation period, Brent Council received written responses and questions through its email inbox from various stakeholders including residents, landlords and landlord groups, including two written letters responding to the consultation from representative organisations. A summary of key themes and concerns is listed below, and the organisations' full submissions are included in Appendix 4.

Opposition to including all section 257 HMOs due to challenges in determining licensing requirements (*Safeagent*)

Fee structure needs to be simplified and renewal discounts extended to all landlords under the previous scheme (*Safeagent and Propertymark*)

Accreditation discounts eligibility to be increased and Safeagent included (*Safeagent*)

Proposed Licence Conditions need to be clear, practical, and non-exclusionary conditions (*Safeagent*)

The council should recognise the important role of letting agents and the new legislation with regards to protecting client money (*Safeagent*)

Recommendation to adopt a targeted licensing approach focusing resources on wards with higher numbers of poorly managed HMOs (*Safeagent and Propertymark*)

Preference for a regulatory framework (instead of the additional HMO licensing scheme) which seeks to educate rather than use punitive measures (*Propertymark*)

Concerns around cost effectiveness of the proposed scheme (*Propertymark*)

Concerns around impact of the fee on cost of living and supply of properties in the PRS (*Propertymark*)

4.3 Letter of support

During the consultation, Brent Council also received letters in support of the council's proposals to implement the additional HMO licensing scheme from the London Assembly Member for Brent and Harrow and also from Enfield Council, drawing on their current experience of implementing property licensing schemes. These letters can be found in Appendix 5.

5. Appendices

- Appendix 1 - Communications and Marketing visuals and analytics
- Appendix 2 – Survey respondent profile
- Appendix 3 – Survey questionnaire
- Appendix 4 – Full written representations
- Appendix 5 – Letters of support

Appendix 1 - Communications and Marketing visuals and analytics

Assets

HAVE YOUR SAY ON OUR PLANS TO LICENCE HMOS IN BRENT

It's all about driving up housing standards for renters.
Let us know your views on regulating the private rented sector.

Consultation ends on 10 June. www.haveyoursay.brent.gov.uk



HAVE YOUR SAY ON OUR PLANS TO LICENCE HMOS IN BRENT

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DRIVING UP STANDARDS FOR RENTERS

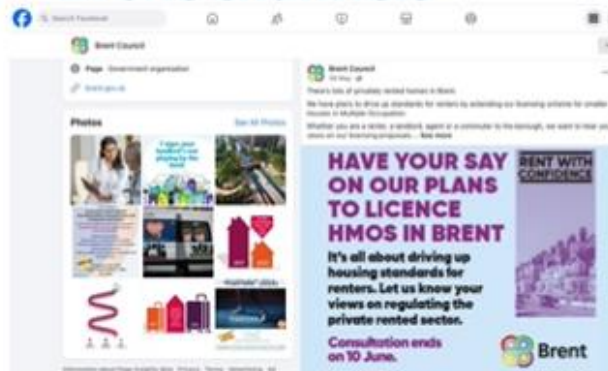
Have your say on plans to license Houses in Multiple Occupation (HMOs) in Brent.

Consultation ends on 10 June.

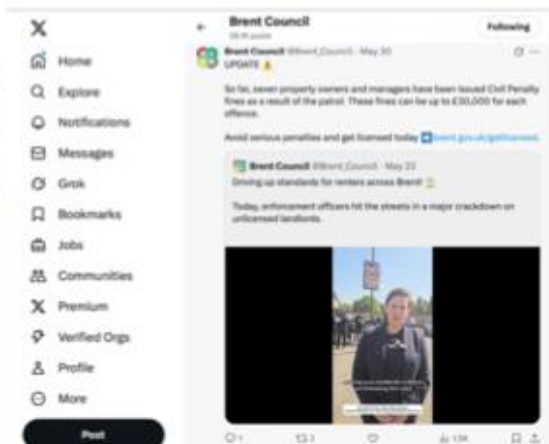
www.haveyoursay.brent.gov.uk/



Brent channels



Facebook



X (formerly Twitter)



LinkedIn



Instagram



Nextdoor

Brent channels

Homepage



Have your say on plans to license HMOs in Brent – consultation extended!
In February 2020, Brent Council introduced a borough-wide additional HMO licensing scheme to improve property conditions and management standards in smaller HMOs occupied by three or four people forming two or more households, sharing amenities. The licensing scheme ended on 31 January 2025.

We are contacting you to inform you of our proposals to introduce a further borough-wide additional HMO licensing scheme from autumn 2025.

We want to build on the work we have already achieved through the previous scheme, working with landlords and managing agents to improve property conditions and management standards in HMO properties, as well as taking a robust enforcement approach against those landlords who fail to comply and put their tenants and the wider community at risk. We believe that a further additional HMO licensing scheme will help us continue this work to make sure that all HMOs are safe and well managed.

Since additional HMO licensing was introduced, we have seen many positive improvements in the condition and management of HMOs. The council has inspected and granted more than 5,000 HMO licences.

We are committed to making sure that HMO properties are well-managed and safe for private renters, as well as creating a level playing field for landlords and letting agents in the borough.

We are running a public consultation and want to hear your views on these proposals. To ensure as many landlords and agents as possible have the opportunity to take part, the deadline has been extended to **10 June 2025**.

Have your say today.
You can also join one of our online information sessions, taking place on **Wednesday 30 April** and **Wednesday 21 May at 6.30pm**. Click the dates to reserve your place and find out more about the proposals.

We appreciate your contribution to providing safe and well-managed accommodation for our residents, and we look forward to receiving your feedback.

If you have any queries or require help in sharing your views with us, please email hmoenquiries@brent.gov.uk or call 020 8507 2384/5.

HMO newsletter



Resident e-newsletter



WhatsApp

The Loop



Out of home – neighbouring boroughs

346,553 impressions



14 sites



14 days



seven boroughs

Online articles



Landlord Today



Harrow Online



The Negotiator



London Property Licensing



Property 118



BBC

Organic social media analytics

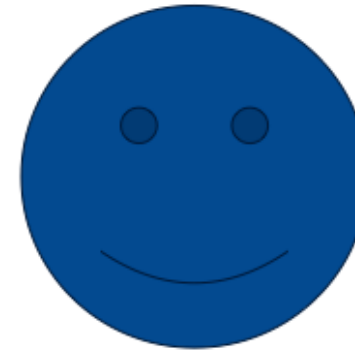
929 clicks



18 posts



82 likes



27,026 views



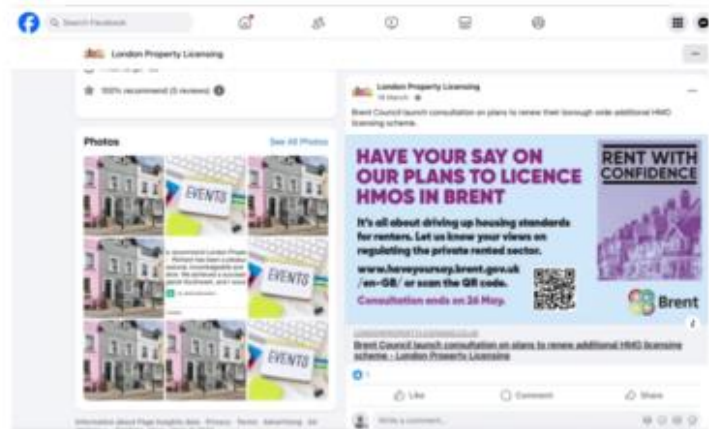
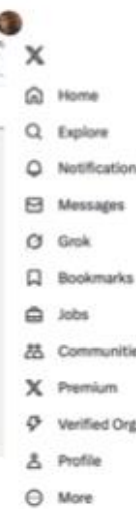
29 reposts



4,441 impressions



Page 261

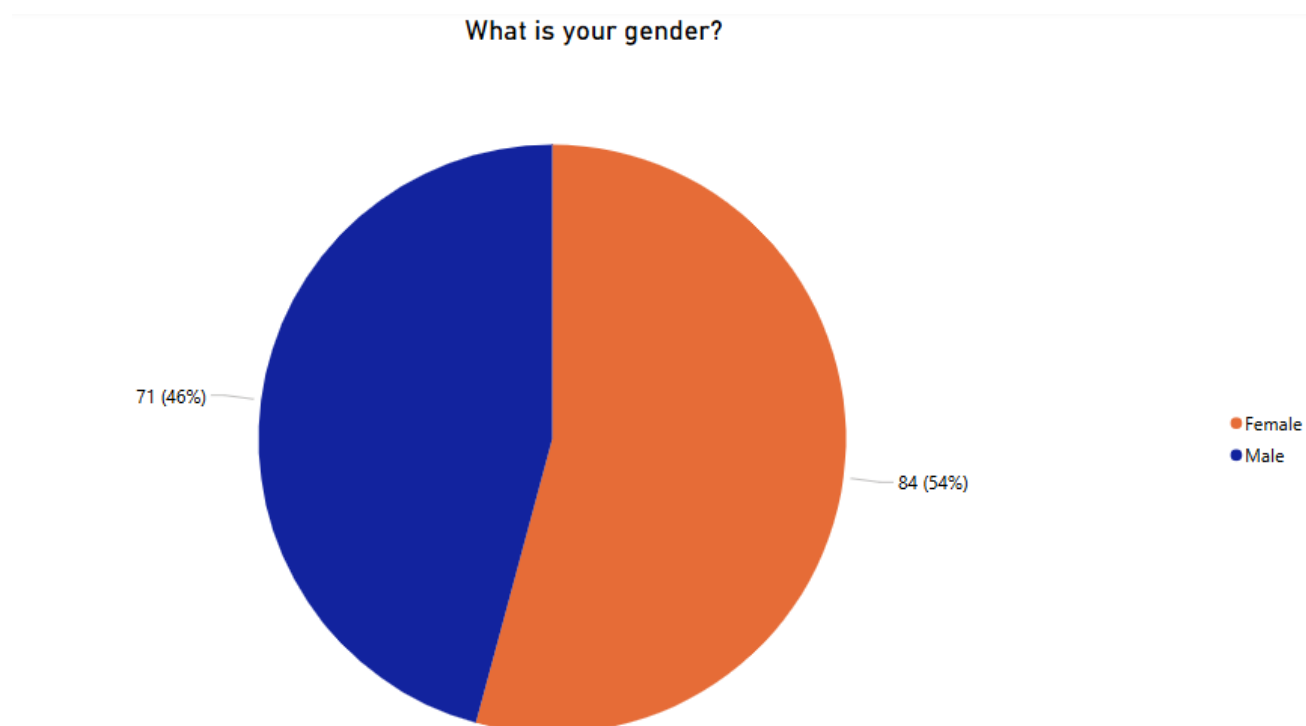


Appendix 2 - Survey respondent profile

The respondents to the consultation survey were asked if they would give their age range, sex, ethnic background, religion, sexual orientation, gender identity and disability status. Their responses were compared with benchmarks for the borough using the 2021 census¹. It is worth noting that for each of these equalities' questions, a certain proportion of respondents either did not respond or chose 'prefer not to say' as their response, therefore fully accurate comparisons with the compulsory census data cannot always be made. Where the census data includes a 'prefer not to say' option, such as sexual orientation, we have included this option as well. However, for other questions where the census does not have this option, such as gender and age, we have only included data for those who responded to the question.

Gender

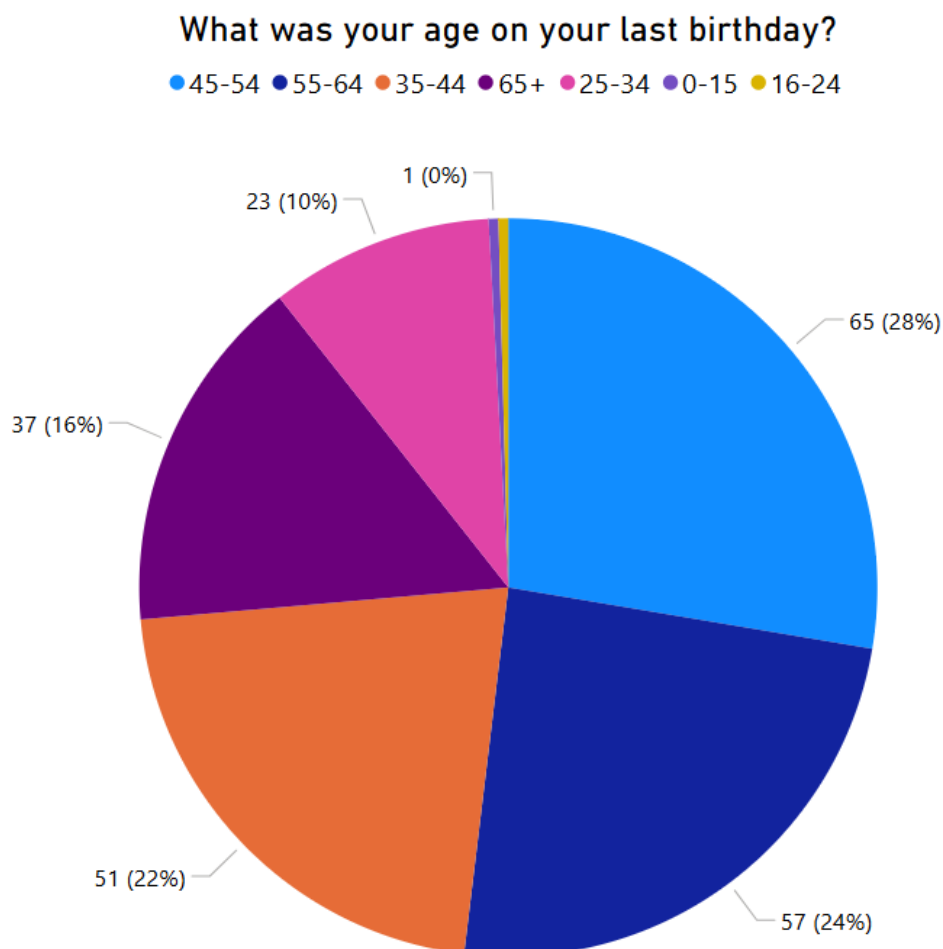
Of the **155** respondents who answered this question, **46%** said they were male and **54%** said they were female.



According to the 2021 Census, the population of Brent is **51%** female and **49%** male, meaning that, among those that chose to answer this question within the survey, women were slightly overrepresented.

¹ [Census - Office for National Statistics](#)

Age



235 respondents answered this question.

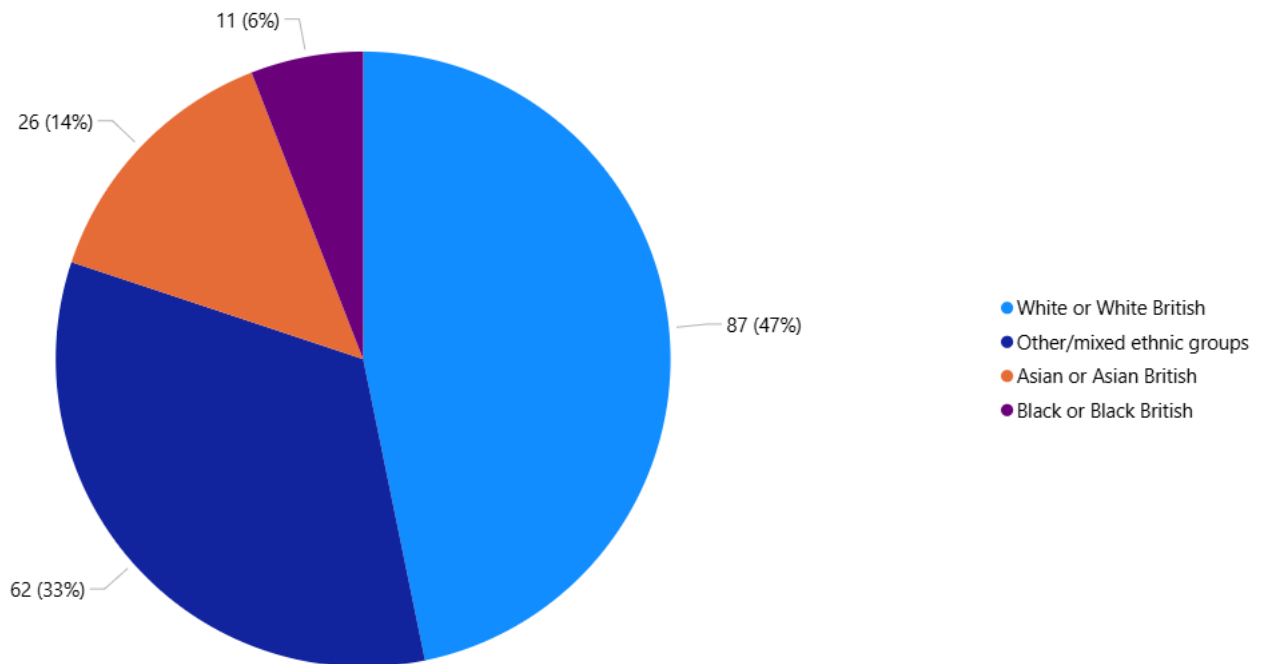
Age groups 45 to 54 years old (**65** responses) and 55 to 64 (**57** responses) were the most represented within the consultation and made up **28%** and **24%** of the total, respectively. The age group 35 to 44 (**51** responses) made up **22%**, 65+ (**37** responses) made up **16%**, 25 to 34 (**23** responses) made up **10%**, while 16 to 24 (**1**) and 15 and under (**1**) each made up **less than 1%**.

Compared to the Census data for the borough, the 45 to 54 (**28%** compared to the Census figure of **14%**), 55 to 64 (**24%** compared to **11%**), 35 to 44 (**22%** compared to **16%**), 65+ age groups (**16%** compared to **12%**) were all overrepresented. The 25 to 34 (**10%** compared to **17%**), 16 to 24 (**less than 1%** compared to **13%**) and 15 and under (**less than 1%** compared to **18%**) were all underrepresented.

Ethnic origin

Respondents were asked 'What is your ethnicity?'. **186** respondents chose to answer this question with their race or ethnicity.

What is your ethnicity?



The 2021 Census results for Brent regarding ethnic groups are shown below:

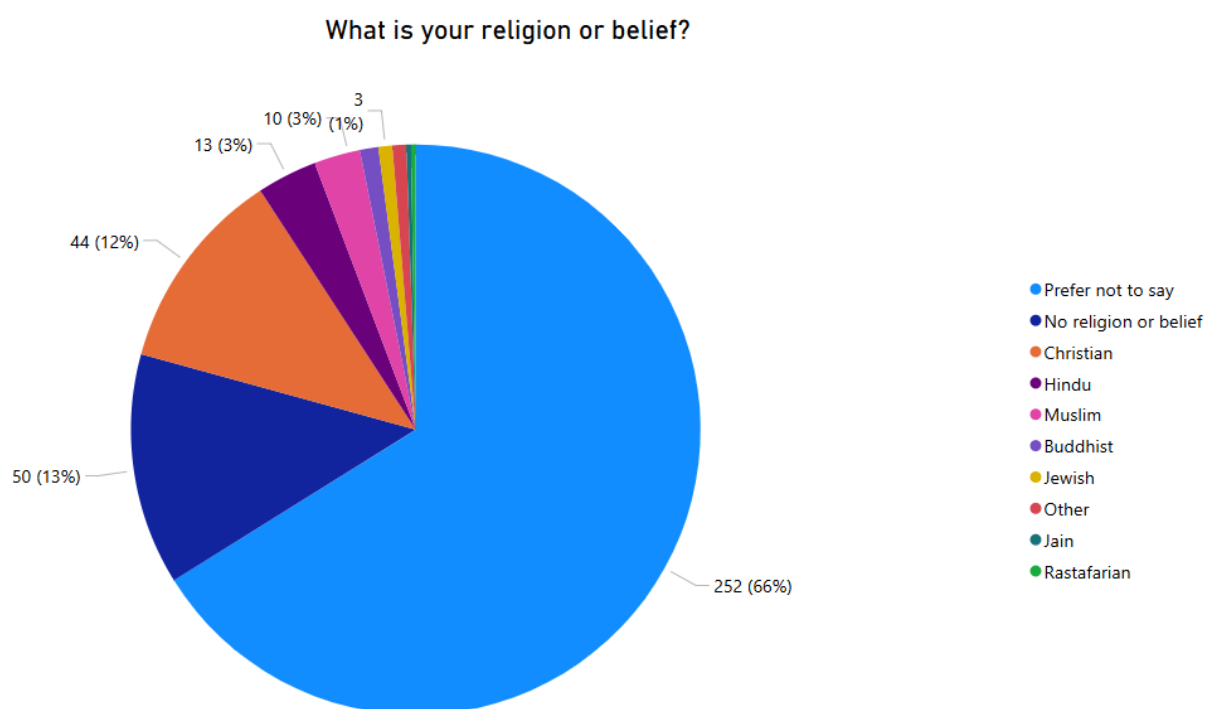
Ethnic Group	Percentage (2021 Census)
White or White British	34.6
Asian or Asian British	32.8
Black or Black British	17.5
Other or Mixed ethnic groups	15

Of the respondents who chose to answer this question, the largest ethnic group was White or White British, who made up **47%** of respondents. This is higher than the borough's Census figure of **34.6%**. This was followed by Other/mixed ethnic groups, making up **33%** of respondents which is above the Census figure of **15%**. Asian or Asian British respondents made up **14%**, compared to the Census figure of **32.8%** and Black or Black British respondents were **6%**, compared to the Census figure of **17.5%**. Therefore both Asian or Asian British and Black or Black British respondents were underrepresented.

It should however be noted that, along with many of the other equalities questions, a majority of respondents (**51%**) chose not to share their ethnicity, so definitive conclusions about representation cannot be made.

Religion and beliefs

Respondents were asked their religion or beliefs. **129** respondents chose to answer this question. Aside from the **66% (252)** who responded 'prefer not to say' (the largest proportion), **13% (50)** responded 'No religion or belief' followed by **12% (44)** responding Christian.



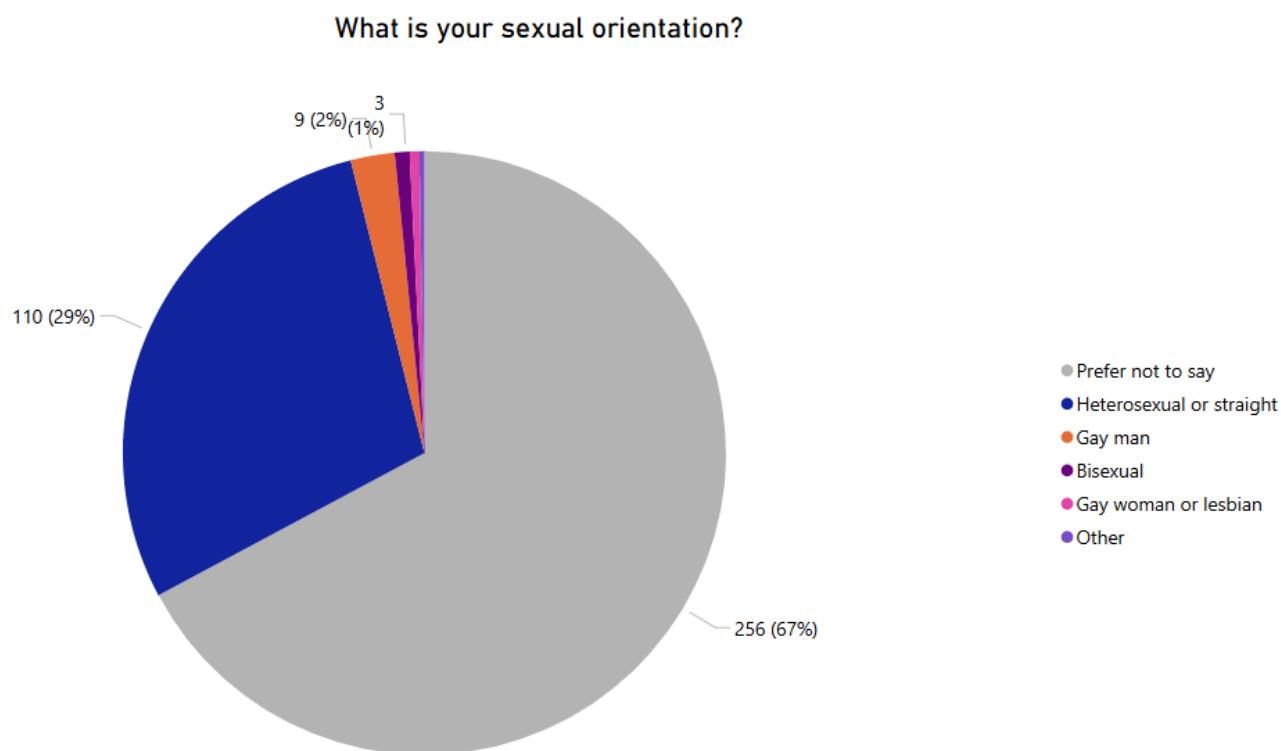
The 2021 Census results for Brent regarding religion or beliefs are shown below.

Religion or beliefs	Percentage (2021 Census)
Christian	38.8
Muslim	21.4
Hindu	15.6
No religion	13.6
Not stated	6.9
Jewish	1.1
Buddhist	0.9
Jain	0.7
Sikh	0.5
Other	0.6

Due to the high proportion of respondents who chose not to respond to this question, accurate comparisons to the borough figures cannot be made.

Sexual orientation

Respondents were also asked their sexual orientation. **125** respondents chose to answer this question. The largest proportion of responses were from people who identified as straight/heterosexual (**64%**). A large proportion of respondents, **27%**, gave the response 'prefer not to say'.



The 2021 Census results for Brent regarding sexual orientation are below.

Sexual orientation	Brent Census 2021 Percentage
Straight or Heterosexual	85.1
Not answered	11.7
Gay or Lesbian	1.3
Bisexual	1.3
Pansexual	0.5
Other	0.1

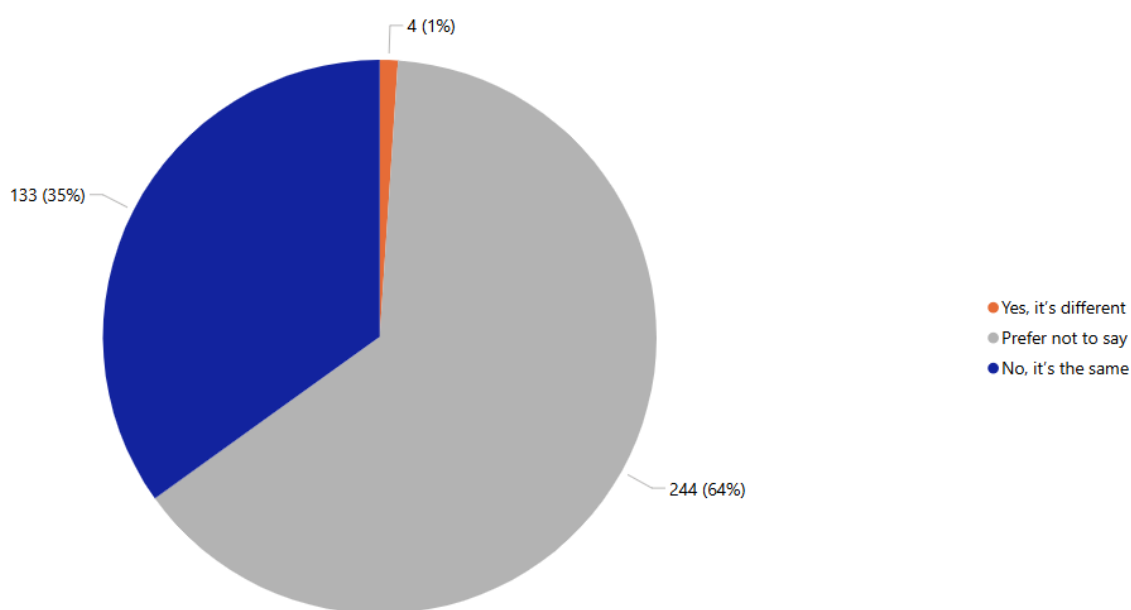
The straight/heterosexual population are underrepresented by the consultation responses (**29%** compared to **85.1%** according to 2021 Census). The gay or lesbian and bisexual populations were slightly overrepresented (**3.6%** versus **2.6% in the Census**). Given the large proportion of respondents to this question who chose not to respond to the question (**67%**), these representations cannot be assumed to be comparable to the wider borough.

Gender identity

Respondents were also asked whether their gender identity is different to the sex they were assumed to be at birth.

137 respondents chose to answer this question. The largest proportion of responses were from people who opted not to say (**64%**). The largest proportion (**35%**) of other respondents said their gender identity was the same as the sex they were assumed to be at birth while a minority (**1%**) said their gender identity was different.

Is your gender identity different to the sex you were assumed to be at birth?



The 2021 census has **1.3%** of Brent residents saying their gender identity is different to their sex registered at birth, however 10.1% of the borough population did not answer that question in the Census therefore the actual proportion of people identifying as transgender may be higher.²

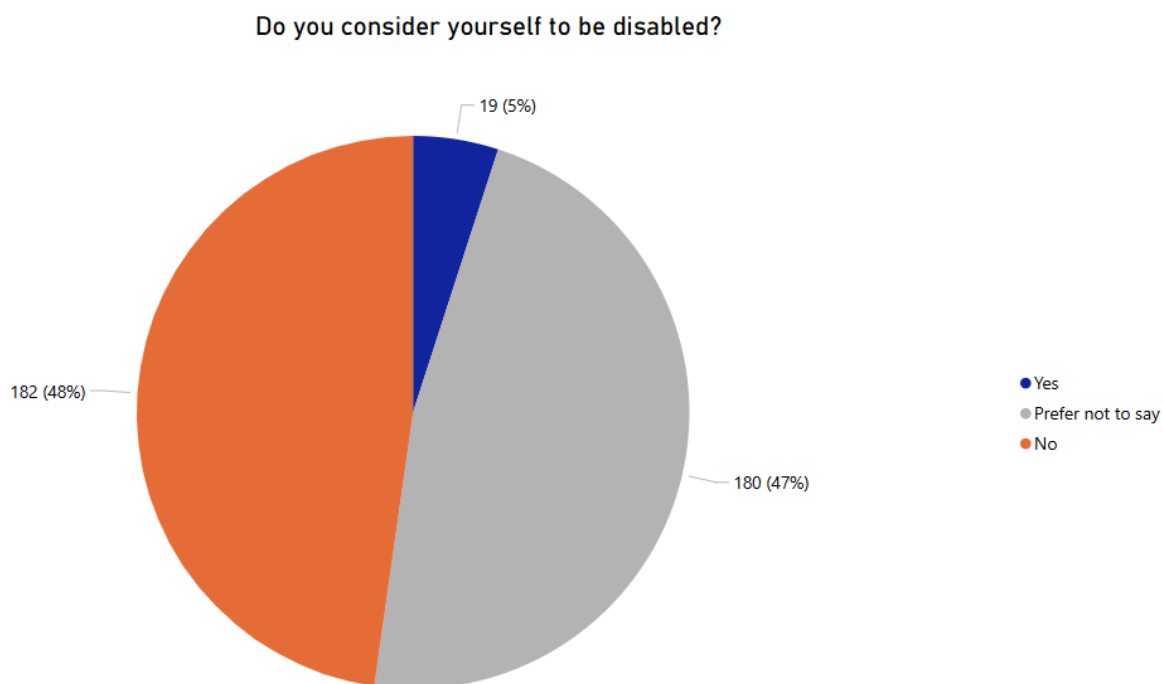
Gender Identity estimates from Census 2021 are official statistics in development. This reflects their innovative nature and the evolving understanding of measuring gender identity, along with the uncertainty associated with these estimates³.

² [LGBTQ+ population in Brent - 2021 Census topic report - revised](#)

³ [Sexual orientation and gender identity quality information for Census 2021 - Office for National Statistics \(ons.gov.uk\)](#)

Disability or long-term health condition

Respondents were also asked if they considered themselves to have a disability. **201** respondents chose to answer this question.



A large proportion (**47%**) did not choose to answer this question.

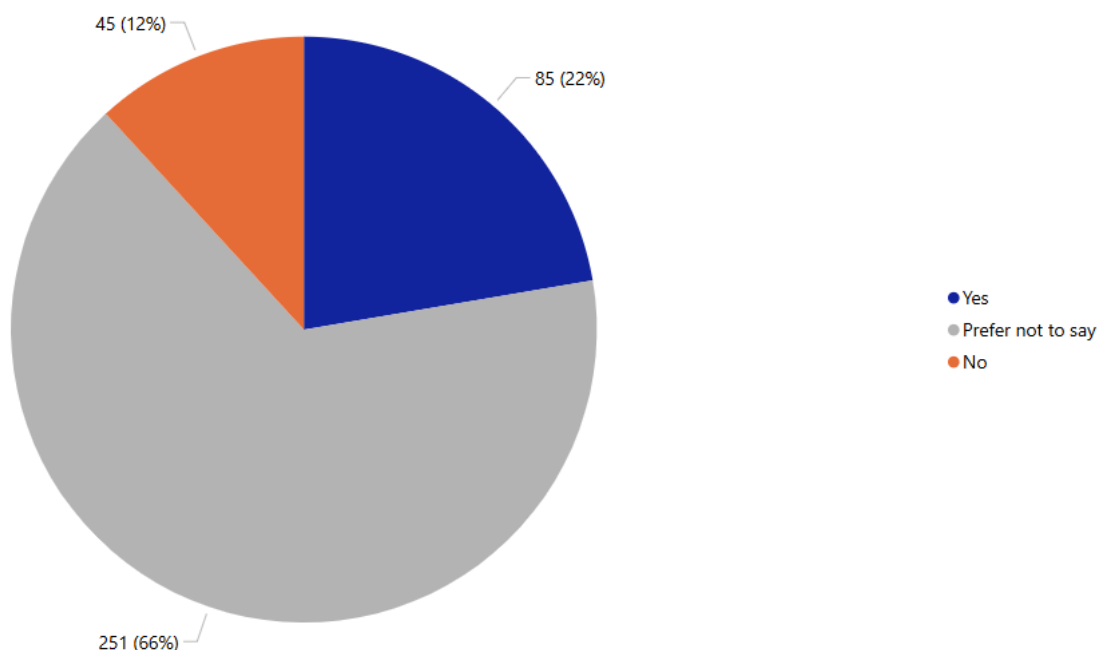
Of those who chose to answer this question, **91%** said they were not disabled while **9%** said they were disabled. The 2021 Census figures for the borough are **85.3%** not disabled and **14.7%** disabled (either 'limited a lot' or 'limited a little'), meaning the disabled population was slightly underrepresented within the survey responses⁴.

Marital Status

Respondents were asked if they were married or in a civil partnership. **130** respondents chose to answer this question.

⁴ [How life has changed in Brent: Census 2021](#)

Are you married or in a civil partnership?



Of those who answered this question, **65%** stated they were married or in a civil partnership while **35%** stated they were not.

Marital Status	Percentage (2021 Census)
Married or in a registered civil partnership	46.9
Not married or in a registered civil partnership	53.1

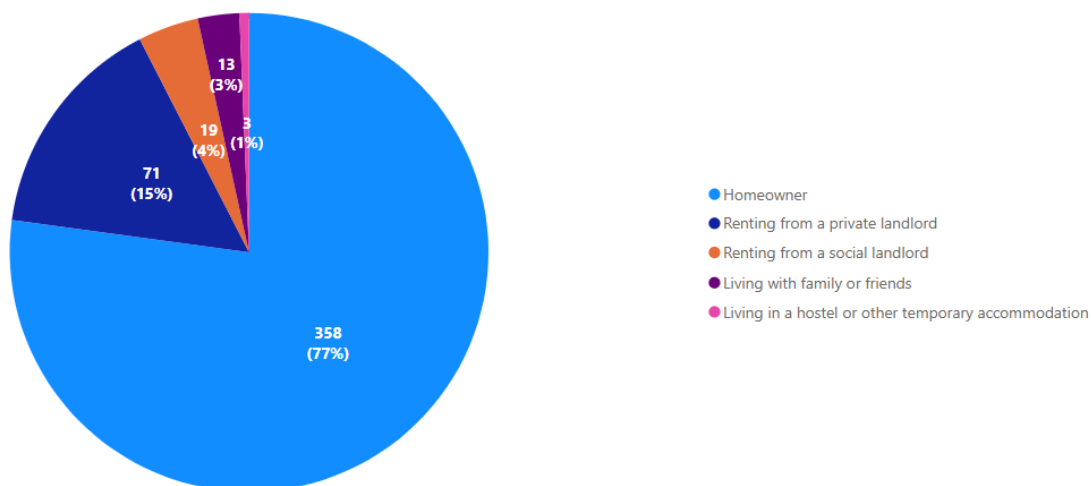
Compared to the Census data, respondents who were married or in a civil partnership were overrepresented (**65%** versus **46.9%** in the Census) and those who were not were underrepresented (**35%** versus **53.1%**).⁵

Accommodation

Respondents were asked if they rent or own their own accommodation with options on their living situation. **464** respondents chose to answer this question.

⁵ [Marriage and civil partnership status in England and Wales - Office for National Statistics](#)

Do you rent or own your accommodation?



A large majority of respondents who responded to this question were homeowners (**77%**). **15%** stated they were renting from a private landlord and **4%** from a social landlord.

Housing Tenure	Percentage (2021 Census)
Owns outright or with a mortgage or loan	27.4
Shared Ownership	0.7
Socially rented	28.3
Private rented	43.4
Lives rent free	0.3

Homeowners were significantly overrepresented (**77%** versus **27.4%**) whereas private rented and socially rented tenures were both significantly underrepresented, **15%** versus **43.4%** and **4%** versus **28.3%** respectively.

Appendix 3 - Survey questionnaire

Have your say on additional HMO licensing in Brent

Additional HMO Licensing
consultation questionnaire



YOUR PRIVACY

All the information you provide will be treated in strict confidence, will only be used for the purposes of this consultation and will only be shared with Cadence Innova who have been appointed by the council as consultants on this project.

Following the consultation a public report will be produced in which feedback from individual members of the public will be anonymous, but views from organisations may be attributed in full.

You can read the council's Privacy Notice here: [Privacy Policy | Brent Council](#)

YOUR CONNECTION TO THE LONDON BOROUGH OF BRENT

In what capacity are you responding to this questionnaire?

PLEASE TICK ✓ ONLY ONE BOX THAT APPLIES TO YOU

<input type="checkbox"/>	As a Brent resident, including a Brent tenant, or a local business in Brent (but not a landlord) – please answer the grey shaded question overleaf, then go to the 'Local Issues?' section
<input type="checkbox"/>	As a landlord, letting or managing agent with properties in Brent – please answer the blue section overleaf, then go to the 'Local Issues?' section
<input type="checkbox"/>	As another type of stakeholder – please answer the pink shaded section overleaf, and following questions

Please provide the following information about yourself (where relevant) so that we can monitor the representativeness of the responses and identify trends. We will take all feedback into account, regardless of whether you provide your personal details.

INFORMATION ABOUT YOU: BRENT RESIDENTS & BUSINESSES

If you are a [resident living in Brent](#), or [responding on behalf of a local business in Brent](#), which of the following [best](#) describes you? PLEASE TICK ✓ ONE BOX ONLY

<input type="checkbox"/>	Private tenant living in a House in Multiple Occupation (HMO) or bedsit where you share some basic amenities (e.g. toilet, bathroom, kitchen) with others
<input type="checkbox"/>	Private tenant living in a single-family dwelling (e.g. a self-contained flat or house)
<input type="checkbox"/>	Brent Council tenant
<input type="checkbox"/>	Housing Association tenant
<input type="checkbox"/>	Own my own home/currently paying a mortgage on my own home
<input type="checkbox"/>	Shared owner – with a share in the equity of the home
<input type="checkbox"/>	Local business in Brent (but not a landlord)
<input type="checkbox"/>	Other <input type="text"/>

INFORMATION ABOUT YOU: LANDLORDS AND AGENTS

If you are a landlord or agent with properties in Brent, which of the following best describes you? PLEASE

TICK ✓ ONE BOX ONLY

<input type="checkbox"/> Landlord who manages their own property	<input type="checkbox"/> Managing agent
<input type="checkbox"/> Landlord who uses a managing or letting agent	<input type="checkbox"/> Registered social landlord
<input type="checkbox"/> Letting agent	<input type="checkbox"/> Other <input type="text"/>

Do you live in the borough?

<input type="checkbox"/> Yes	<input type="checkbox"/> No
------------------------------	-----------------------------

Please indicate how many properties you own/manage in the borough, for each of the following types.

PLEASE TICK ✓ ONE BOX FOR EACH TYPE OF PROPERTY

	0	1	2-10	11-50	51-100	101+
House in Multiple Occupation (3 or 4 people)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Self-contained flat converted	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Self-contained flat purpose built	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
House in Multiple Occupation (5 or more people)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Single family occupancy house/bungalow	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Are you accredited or a member of any of the following? If yes, PLEASE TICK ✓ ALL THAT APPLY

<input type="checkbox"/> National Residential Landlords Association (NRLA)	<input type="checkbox"/> ARLA Propertymark
<input type="checkbox"/> London Landlord Accreditation Scheme (LLAS)	<input type="checkbox"/> Royal Institution of Chartered Surveyors (RICS)
<input type="checkbox"/> UK Association of Letting Agents (UKALA)	<input type="checkbox"/> Other landlord/letting agent association <input type="text"/>
<input type="checkbox"/> Safeagent	<input type="checkbox"/> No

INFORMATION ABOUT YOU: ORGANISATIONS AND OTHER STAKEHOLDERS

If you are responding on behalf of an organisation, which organisation do you represent?

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

Please give us the name of the organisation and any specific group or department. Please also tell us who the organisation represents, what area it covers and how you gathered the views of members.

If you are another stakeholder (e.g. with links to a neighbouring borough), please use the box below to provide full details. PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

LOCAL ISSUES

To what extent do you believe each of the following to be a problem in your local area?

PLEASE TICK ✓ ONE BOX IN EACH ROW

	Not a problem at all	Not a very big problem	A fairly big problem	A very big problem	Don't know
Poor property conditions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Antisocial behaviour (ASB)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ADDITIONAL HMO LICENSING SCHEME

Many people live in houses in multiple occupation (HMOs), which are properties that are shared by three or more unrelated people who form more than one household, and share toilet, washing or cooking facilities. HMOs can provide affordable and flexible accommodation, but they can also pose risks to health, safety, and wellbeing if they are poorly managed or maintained.

The council has a duty and a power to regulate HMOs through licensing schemes, which aim to ensure that HMOs meet certain standards and do not cause problems for tenants or neighbours.

Brent Council, like all other councils across the country, must operate a mandatory licensing scheme for larger HMOs. In 2015, Brent introduced a boroughwide additional HMO licensing scheme that applies to smaller HMOs that are occupied by three or four unrelated people. The scheme was renewed in February 2020 and ended on 31 January 2025.

We want to continue to improve the quality and safety of HMOs in the borough and so we are consulting on our proposal to introduce a further boroughwide additional HMO licensing scheme in Autumn 2025. Implementing an additional HMO licensing scheme will enable the council to further tackle issues such as poor conditions and the antisocial behaviour that is sometimes associated with HMO properties.

Brent Council proposes to introduce a boroughwide additional licensing scheme that will require all landlords to have a licence to let an HMO and meet certain property and management conditions. The council is allowed to set fees for licence applications that take account of its costs in administering and carrying out the licensing functions, such as covering the costs of processing a licence application, inspecting and monitoring compliance with licence conditions and enforcing the scheme. You can read more about the proposed scheme in the consultation Evidence Pack.

Thinking about the HMO tenure in Brent, to what extent do you agree or disagree with the following statements? PLEASE TICK ✓ ONE BOX FOR EACH STATEMENT

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
The number of HMOs in the borough has been increasing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
There are increased health and safety issues with HMOs, such as fire safety	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Overcrowding is a problem in HMOs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HMOs in the borough cause neighbourhood problems such as noise, nuisance, rubbish and other antisocial behaviour	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poorly maintained HMO properties and gardens are contributing to the decline of neighbourhoods in the borough	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poor management of HMOs is contributing to the decline of neighbourhoods in the borough	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Landlords of HMOs have a responsibility to manage their properties effectively	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
To help with the management of HMOs in the borough, landlords must be 'fit and proper persons' (e.g. have proper management or financial arrangements in place, and not have convictions for certain types of offences)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

To what extent do you agree or disagree with the proposal for a boroughwide additional HMO licensing scheme in Brent? PLEASE TICK ✓ ONE BOX ONLY

Strongly agree <input type="checkbox"/>	Tend to agree <input type="checkbox"/>	Neither agree nor disagree <input type="checkbox"/>	Tend to disagree <input type="checkbox"/>	Strongly disagree <input type="checkbox"/>	Don't know <input type="checkbox"/>
--	---	--	--	---	--

If you disagree with the proposals for an additional HMO licensing scheme, please explain why

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

What alternatives do you think should be considered to address the problems?

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

To what extent do you agree or disagree that an additional HMO licensing scheme will help to achieve the following outcomes? PLEASE TICK ✓ ONE BOX FOR EACH STATEMENT

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Improve the external condition of HMOs, including gardens	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve property safety and standards for HMO tenants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Help to improve the quality of neighbourhoods and tackle issues of noise, nuisance, rubbish, bulky waste, fly-tipping and other antisocial behaviour	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Help HMO tenants to increase their awareness and understanding of their rights and responsibilities when living in the PRS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Help identify poorly performing HMO landlords, managing and letting agents	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Assist HMO landlords to raise their standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support compliant HMO landlords	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

LICENCE CONDITIONS

The proposed additional HMO licensing scheme will require HMO landlords to obtain a licence. The law requires that every licence must include certain mandatory conditions. The council can also include other discretionary conditions, which the council considers appropriate to improve property safety and standards and for tackling the issues identified.

The mandatory conditions are those relating to electrical, gas and fire safety, tenancy agreements, minimum sleeping room sizes and the disposal of household waste. These are required by law and must be applied. These mandatory conditions do not form part of the consultation.

The discretionary conditions are part of the consultation, and the council can decide on these in order to deal with the management, use, occupation, condition and contents of the licensed property. Details of the mandatory and proposed discretionary HMO licence conditions can be found in Evidence Pack Appendix 2.

To what extent do you agree or disagree with the proposed additional HMO licensing discretionary conditions?

PLEASE TICK ✓ ONE BOX ONLY

Strongly agree <input type="checkbox"/>	Tend to agree <input type="checkbox"/>	Neither agree nor disagree <input type="checkbox"/>	Tend to disagree <input type="checkbox"/>	Strongly disagree <input type="checkbox"/>	Don't know <input type="checkbox"/>
--	---	--	--	---	--

If you disagree with any of the discretionary conditions for additional HMO licensing, please explain why

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

Are there any other licence conditions (that are not already covered under the mandatory or proposed discretionary licence conditions) that you think should be included?

Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
---------------------------------	--------------------------------	--

If 'Yes', please state below.

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

LICENCE OBJECTIVES

As part of the planning process for any additional HMO licensing scheme, the council must define its objectives for the scheme, and set out how it plans to achieve these.

You can find out more about the proposed scheme objectives in the supporting consultation Evidence Pack (see page 36).

To what extent do you agree or disagree with the proposed additional HMO licensing objectives? PLEASE TICK ✓ ONE BOX ONLY

Strongly agree <input type="checkbox"/>	Tend to agree <input type="checkbox"/>	Neither agree nor disagree <input type="checkbox"/>	Tend to disagree <input type="checkbox"/>	Strongly disagree <input type="checkbox"/>	Don't know <input type="checkbox"/>
--	---	--	--	---	--

If you disagree with any of the objectives for additional HMO licensing, please explain why

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

Are there any other additional HMO licence objectives (that are not already covered by the objectives listed) that you think should be included?

Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
---------------------------------	--------------------------------	--

If 'Yes', please state below

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

Page 11 of 17

LICENCE FEES

The Housing Act 2004 permits the council to set licensing fees to cover the costs of administering and enforcing the licensing scheme over five years. HMO landlords will be required to pay a fee for each HMO property that needs a licence.

Licence fees cannot be used elsewhere in the council or used to generate a profit. As long as the licence conditions are complied with, the licence would remain valid up to a maximum of five years.

The council proposes to charge £1040 per HMO property licence. The law requires that the licence fee is collected in two parts. The first part of the fee (£540) covers the costs of processing, administering and validating the application. The second part of the fee (£500) is a contribution to the other costs incurred by the council in running and enforcing the scheme and will be charged when the licence has been granted.

The licence fee will be annually reviewed.

The full schedule of licence fees, discounts and charges can be found in Evidence Pack Appendix 3.

What are your views on the proposed fee?

PLEASE TICK ✓ ONE BOX ONLY

I think the fee is too high	I think the fee is at about the right level	I think the fee is too low	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

LICENCE FEE DISCOUNTS

The council is proposing to offer a discount to landlords who are accredited under the London Landlords Accreditation Scheme (LLAS) of **£40.00**. More detailed information on fees, charges and discounts can be found in Evidence Pack Appendix 3.

This discount is at the discretion of the council and will be kept under review.

What are your views on the proposed discount?

PLEASE TICK ✓ ONE BOX ONLY


	I think the discount is too low	I think the discount is at about the right level	I think the discount is too high	Don't know
Accredited Landlord	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DO YOU HAVE ANY FURTHER COMMENTS?

The council wants to make sure that additional HMOs are safe and well-managed. Do you have any other suggestions the council should consider in helping improve the condition and management of additional HMOs in Brent?

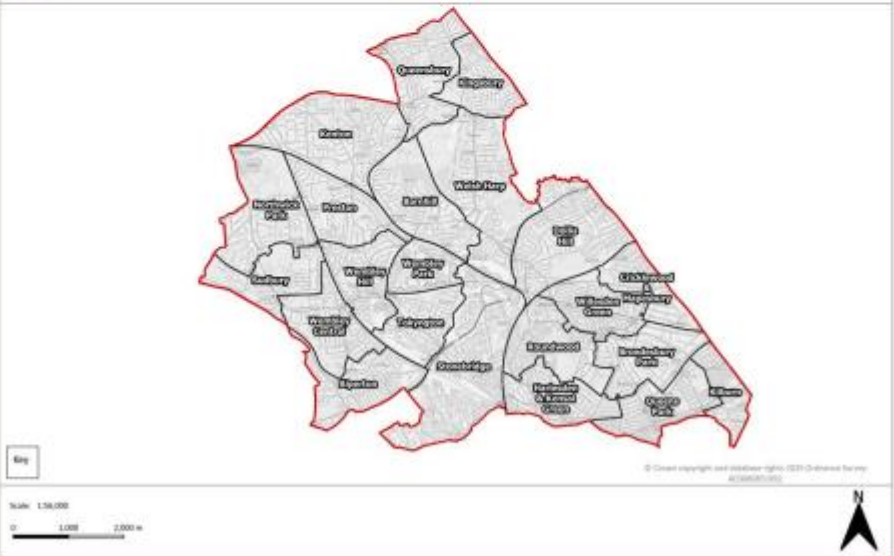
If you have any other comments that you would like to make about the council’s proposed additional HMO licensing scheme, please provide details. PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

LICENSING DESIGNATION

**Brent**

Map of Borough

Date: 21/02/2025



Brent Council is legally obliged to offer to send you a copy of the licensing designation(s) before any licensing scheme is introduced. These are supporting documents that define various things including the area where licensing will be required (in this case, boroughwide), as well as detailing the commencement and duration of the designation(s).

If you would like to receive a copy of the licensing designation(s) please provide your name and email address in the box below.

Your contact details will be used by Brent Council only for the purpose of the notification under the **Housing Act 2004** of the licensing designation(s), as required to fulfil the council's duties under **Regulation 9 (3) - The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006**. The publication requirements relating to designations require that within two weeks after the designation is confirmed or made, the local housing authority must send a copy of the notice to any person who responded to the consultation, any organisation which, to the reasonable knowledge of the authority represents the interests of landlords or tenants or property letting agents within the designated area; and every organisation within the local housing authority area that the local housing authority knows or believes provides advice on landlord and tenant matters.

If you would like to receive a copy of the consultation report please provide your name and email address in the box below.

The contact information will not be shared, shall be retained for no more than three years after decisions have been finalised, and shall be processed in adherence to your legal rights, including but not limited to the right to withdraw consent, right to copies of your information and right to be forgotten. If you are dissatisfied with the processing of your information, you can raise your concern with the council's Data Protection Officer. You have a right to lodge a complaint with the Information Commissioner's Office (www.ico.org.uk). Further information can be found at [Privacy Policy | Brent Council](#)

MORE INFORMATION ABOUT YOU

What is the first part of your postcode (e.g. NW2)?

This will help us understand views in different areas

If you are providing your own personal response, please answer the questions below...

Brent Council has a duty to promote equality and want to make sure all parts of the community are included in this consultation, but these questions are optional. All consultation responses will be taken fully into account when making decisions, regardless of whether you provide your details.

How did you hear about this consultation? (tick all that apply)

- | | |
|---|---|
| <input type="checkbox"/> Leaflet | <input type="checkbox"/> Poster |
| <input type="checkbox"/> Email | <input type="checkbox"/> Brent Council website |
| <input type="checkbox"/> Brent Council e-newsletter | <input type="checkbox"/> Local newspaper |
| <input type="checkbox"/> Word of mouth | <input type="checkbox"/> Other (please specify) |

What was your age on your last birthday?

- | | |
|-----------------------------------|--|
| <input type="checkbox"/> 0 to 15 | <input type="checkbox"/> 45 to 54 |
| <input type="checkbox"/> 16 to 24 | <input type="checkbox"/> 55 to 64 |
| <input type="checkbox"/> 25 to 34 | <input type="checkbox"/> 65+ |
| <input type="checkbox"/> 35 to 44 | <input type="checkbox"/> Prefer not to say |

What is your gender?

- | | |
|--|---------------------------------|
| <input type="checkbox"/> Male | <input type="checkbox"/> Female |
| <input type="checkbox"/> Prefer not to say | |

Is your gender identity different to the sex you were assumed to be at birth?

- | | |
|--|--|
| <input type="checkbox"/> Yes, it's different | <input type="checkbox"/> No, it's the same |
| <input type="checkbox"/> Prefer not to say | |

Have you been pregnant, on maternity leave or breastfeeding within the last six months?

- | | |
|--|-----------------------------|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| <input type="checkbox"/> Prefer not to say | |

What is your sexual orientation?

- | | |
|---|---|
| <input type="checkbox"/> Heterosexual or straight | <input type="checkbox"/> Bisexual |
| <input type="checkbox"/> Gay woman or lesbian | <input type="checkbox"/> Other (please specify) |
| <input type="checkbox"/> Gay man | <input type="text"/> |
| <input type="checkbox"/> Prefer not to say | |

Are you married or in a civil partnership?

- | | |
|--|-----------------------------|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| <input type="checkbox"/> Prefer not to say | |

What is your ethnicity?

- | |
|--|
| <input type="checkbox"/> Asian or Asian British: Bangladeshi |
| <input type="checkbox"/> Asian or Asian British: Chinese |
| <input type="checkbox"/> Asian or Asian British: Indian |

- | |
|---|
| <input type="checkbox"/> Asian or Asian British: Pakistani |
| <input type="checkbox"/> Asian or Asian British: Sri Lankan |
| <input type="checkbox"/> Asian or Asian British: Other |

- | |
|--|
| <input type="checkbox"/> Black or Black British: African |
| <input type="checkbox"/> Black or Black British: Caribbean |
| <input type="checkbox"/> Black or Black British: Somali |
| <input type="checkbox"/> Black or Black British: Other |

- | |
|--|
| <input type="checkbox"/> Mixed background: White and Asian |
| <input type="checkbox"/> Mixed background: White and Black African |
| <input type="checkbox"/> Mixed background: White and Black Caribbean |
| <input type="checkbox"/> Mixed background: Other |

- | |
|--|
| <input type="checkbox"/> White or White British: British, English, Welsh, Scottish or Northern Irish |
|--|

- | |
|---|
| <input type="checkbox"/> White or White British: Eastern European |
| <input type="checkbox"/> White or White British: Gypsy, Roma or Traveller |
| <input type="checkbox"/> White or White British: Irish |
| <input type="checkbox"/> White or White British: Western European |
| <input type="checkbox"/> White or White British: Other |

- | |
|---|
| <input type="checkbox"/> Other ethnic background: Arab |
| <input type="checkbox"/> Other ethnic background: Latin American |
| <input type="checkbox"/> Other ethnic background: Prefer not to say |
| <input type="checkbox"/> Other ethnic background: Other |

Do you consider yourself to be disabled?

- ☐ Yes ☐ No
☐ Prefer not to say

If you are disabled, what is the nature of your disability? *Under the Equality Act, you are disabled if you have a long-term physical or mental impairment which affects your ability to carry out day-to-day activities.*

- ☐ Learning or developmental disabilities (including dyslexia and autism)
☐ Long term illness (including cancer, diabetes, HIV and multiple sclerosis)
☐ Mental health condition (including anxiety, bipolar disorder and depression)
☐ Physical impairment (including arthritis, cerebral palsy and using a wheelchair)
☐ Sensory impairment (including hearing, sight and speech impairments)
☐ Prefer not to say
☐ Other

What is your religion or belief?

- ☐ No religion or belief ☐ Jain
☐ Christian ☐ Rastafarian
☐ Jewish ☐ No religion/belief
☐ Sikh ☐ Other (please specify)
☐ Baha'i
☐ Hindu ☐ Prefer not to say
☐ Muslim
☐ Buddhist

How long have you owned property in Brent?

- ☐ Less than one year ☐ 5 to 10 years
☐ 1 to 2 years ☐ 10+ years
☐ 2 to 5 years ☐ Not applicable

Appendix 4 - Full written representations

Safeagent



Proposed Additional Licensing Scheme in the London Borough of Brent

Safeagent Consultation Response

10 June 2025

An Introduction to safeagent

Safeagent is a not for profit accrediting organisation for lettings and management agents in the private rented sector. Safeagent (formerly NALS) provides an overarching quality mark, easily recognised by consumers, with minimum entry requirements for agents. Safeagent operates a government approved client money protection scheme and is a training provider recognised by the Scottish and Welsh governments for agents meeting regulatory requirements in those devolved nations.

Safeagent agents are required to:

- deliver defined standards of customer service
- operate within strict client accounting standards
- maintain a separate client bank account
- be included under a Client Money Protection Scheme

Agents must provide evidence that they continue to meet safeagent criteria on an annual basis to retain their accreditation. The scheme operates UK wide and has 1,700 firms with over 3,000 offices, including agents within the London Borough of Brent.

We very much welcome the opportunity to contribute to this consultation exercise.

Overview

We understand Brent Council is consulting on plans to renew their borough wide additional licensing scheme after the previous scheme ended on 31 January 2025. In preparing this consultation response, we have carefully considered the information published on the council's website.

Evidence base and review of existing scheme

We note Brent Council have operated a borough wide additional licensing scheme for the last 5 years and that 2,526 properties were licensed under the previous scheme.

We are pleased to note the high property inspection rate with over 3,000 property inspections undertaken in two years. We think it is vital to undertake physical inspections to identify hazards and ensure appropriate remedial action is taken, rather than rely on desktop assessments of licence applications.

We welcome the use of banning orders by Brent Council to tackle the worst offenders and stop them from operating in the private rented sector.

Whilst we welcome the limited high level data that has been shared, we expected to see a more detailed review of the previous additional licensing scheme published alongside the business case for scheme renewal.

In relation to the evidence base, the data indicates a large spike in HMOs subject to additional licensing in Wembley Park, but very low numbers in wards such as Alperton, Barnhill, Kenton, Kingsbury, Northwick Park, Preston, Queensbury, Sudbury, Tokyngton, Welsh Harp and Wembley Central. Whilst the data includes some 'hidden HMOs', we could find no definition and no certainty what this was referring to. The data suggests a better use of limited resources could be to focus the licensing scheme on those wards with the highest number of HMOs that are cause for concern to achieve more targeted interventions.

The business case for including Wembley Park within a new additional licensing scheme looks particularly weak. Despite having the largest number of HMOs subject to additional licensing, the data shows extremely low levels of hazards, ASB incidents, tenant complaints and enforcement interventions. As the council point it, the scheme can only be introduced if the council is satisfied a significant proportion of the HMOs in that ward are being poorly managed and are giving rise to problems affecting the occupiers or members of the public. With all the published data indicating this test is not met, there appears to be no sound basis for implementing the additional licensing scheme in this ward.

Section 257 HMOs (certain converted blocks of flats)

The consultation explains the council intend to include all section 257 HMOs within the proposed additional licensing scheme.

We have concerns about including all such properties within the additional licensing scheme due to the difficulty experienced by letting agents in knowing when a property was converted and whether the conversion satisfies the relevant building standards. It is not something that is reasonable for a letting agent to assess.

In situations where there is a freeholder and separate long leaseholders, the situation is further complicated by the need to determine whether less than two thirds of the flats are owner-occupied. Only the freeholder may possess this information and the tenure of each flat may vary over time.

This would make it extremely difficult for a safeagent accredited firm to assess whether a licence is required, despite their best endeavours. For example, it may be that the building did not require a licence when a flat was rented out but subsequently requires licensing because another leaseholder in the building has rented out their flat. As such, a letting agent could find themselves committing an offence of managing a flat in a licensable building without a licence, simply because another flat had been rented out without their knowledge. This also has implications for the long leasehold landlord regarding a potential Rent Repayment Order application.

Bringing section 257 HMOs within the additional licensing scheme could also be problematic for long-leasehold owner-occupiers who find their flat is within a licensable building. The licensing fee may push up their service charge and could cause difficulties with their mortgage lender. As the licence would need to be disclosed to a prospective purchaser, some mortgage lenders may be reluctant to

lend on a residential mortgage for a flat within a licensed HMO, thus adversely impacting the property's value.

It is also the case that the 2024 general approval to introduce an additional licensing scheme only applies if the council has consulted persons likely to be affected by the scheme designation. Without actively consulting long leaseholder owner occupiers and explaining the implications of licensing section 257 HMOs, the conditions in the general approval would not be met and the additional licensing scheme could not be introduced without Secretary of State approval.

Whilst we are opposed to the idea of including all section 257 HMOs within the additional licensing scheme, we recognise there are circumstances where a particular type of section 257 HMO may be worthy of more intensive regulation. For example, where a landlord has converted a property into cramped and poorly designed studio flats entirely for private rental without any planning or building regulation approval.

In such circumstances, the additional licensing scheme could be restricted to section 257 HMOs where the whole building and all the individual flats within it are in single ownership or considered to be effectively under the same control. In response to our feedback, several councils have adopted this approach.

Other councils such as Westminster City Council, Newham Council and the Royal Borough of Kensington and Chelsea have listened to our feedback and excluded all section 257 HMOs from their additional licensing schemes.

We would encourage Brent Council to give this further thought and either narrow the section 257 HMO licensing criteria or remove them entirely from the scheme.

Licensing fees

We recognise the council need to charge a reasonable fee to cover the cost of administering and enforcing the licensing scheme. It is important that the council implement an efficient and streamlined licence application and processing system. This will help to minimise costs and keep fees at a reasonable level, thereby minimising upward pressure on the rent that is charged to tenants.

We understand the council is intending to charge an additional licence application fee of £1,040 plus an extra £25 / room if there are more than five habitable rooms.

We think the extra £25 / room if there are more than five habitable rooms causes unnecessary complication, particularly as most additional licences will be for properties with two, three or four bedrooms. It creates confusion about how to classify an open plan kitchen / dining / living room and could have the unintended consequence of discouraging shared living or dining rooms and space to study. We would encourage the council to remove this extra cost.

We welcome the proposed £100 discount for licence renewals. However, we note it says the discount will only be offered if the renewal application is submitted before the expiry of the existing licence. Given the significant gap between the old scheme ending and new scheme starting, this could unfairly impact on landlords with licences that expired before the new scheme was implemented. If the scheme is renewed, we would recommend this discount is extended to all landlords and

agents licensed under the previous scheme provided their renewal application is submitted within three months of any new scheme being introduced.

We note Brent Council is proposing a £40 accreditation discount and says this is restricted to landlords and managing agents accredited through the London Landlord Accreditation Scheme. We express concern that this appears to exclude safeagent accredited firms. We believe firms that pass our stringent annual verification checks to obtain accreditation status, including redress scheme membership and client money protection for any client funds held, should be eligible for the accreditation discount. We would encourage the council to give this matter further consideration. It incentivises landlords to appoint an accredited managing agent and drive up standards in the private rented sector.

We note the accreditation discount says it only applies to 'first time applications'. We would not support this approach as it is equally important to incentivise accreditation when licences are renewed.

We encourage the council to increase the accreditation discount which represents less than 4% of the licence application fee. We note some councils offer accreditation discounts up to 20%.

Licence Conditions

We have studied the proposed list of additional licence conditions published on the council's website.

We have made some suggestions to help improve and fine tune the wording of the conditions. This in turn should help landlords and agents to understand and comply with the requirements.

Note 5

Insisting a property licence must be displayed in the tenant's home can create an unwelcome institutional feel, particularly when the property is let to a small group of friends on one joint tenancy agreement. We would request flexibility to display a copy of the licence or give a copy to the tenants at the start of the tenancy. If this is intended as an enforceable licence condition, it should also be moved from 'Notes' into licence conditions.

Condition 3 – amenity and space

We are unsure what this condition means in practice. It is for the local authority to assess the maximum occupancy limit when the licence is granted, and the responsibility of the licence holder to comply with that limit. If the purpose of this condition is simply to reinforce this point, we would suggest it is reworded so the meaning is clear.

Condition 5 – tenant references

We would encourage the council to review this referencing condition. The wording should be sufficiently broad to avoid excluding vulnerable groups from the private rented sector. For example, prison leavers, people granted asylum, people fleeing domestic violence and homeless people trying to move into secure accommodation may all struggle to source a reference. We would ask that the council consider the risk of exclusion as part of the equalities impact assessment and make any necessary adjustments to avoid that happening.

Condition 6 – rent payments

This condition duplicates condition 7 and relates to tenancy deposits. It also incorrectly says tenancy deposit information must be provided at the time the deposit is taken, whereas condition 7 correctly explains the timescale is within 30 days. This condition should be deleted.

Condition 8 – complaints procedure

We think it is excessive to require every private landlord, even if they let out just one property, to develop a written complaints procedure. The condition also fails to make clear if this is referring to complaints about something the landlord has, or has not done, or whether it is referring to repair reporting arrangements which are something quite different. With the Renters Right Bill soon to implement a national landlord register and a mandatory landlord redress scheme, we would suggest this condition be deleted and let the new legislative framework to cover this topic.

Condition 9 / 9a – anti social behaviour

We think it is excessive to require every private landlord, even if they let out just one property, to develop a written procedure to tackle any ASB that might occur, and to provide a copy to every tenant at the start of their tenancy. What might be appropriate for a large public sector landlord like the local authority or an institutional build to rent landlord, may not be reasonable for every small private landlord. We would suggest more general wording that requires the licence holder to take all reasonable and practicable steps in accordance with the procedure outlined in condition 9b.

In relation to 9a(i), we disagree with the prescriptive requirement a private landlord cannot allow anyone to rent a property in the borough unless they are satisfied they are not likely to cause anti-social behaviour. This has huge implications for exclusion. It could also effectively stop councils using the private rented sector to house chaotic families in temporary accommodation. We would invite the council to consider where families can live if they cannot afford to buy a home, are not eligible for council housing and yet are excluded from the private rented sector by this clause. We would strongly encourage the council to delete or substantially amend this clause.

We equally have concerns about condition 9a(ii). Criminal convictions, whether spent or unspent, are sensitive personal data under GDPR for which additional data handling restrictions apply. We do not think it is appropriate, and potentially not lawful, for the council to insist landlords obtain this information from every prospective tenant. We would encourage the council to seek legal advice and also seek input from the Information Commissioner's Office to ensure no sensitive data handling breach occurs. We also think it is highly irregular for a landlord or agent to be required to review a tenant's criminal convictions and decide if they should be excluded from renting a property in Brent.

In relation to 9a(iv), we do not agree the council can stipulate what information must be disclosed to a third party when providing a reference for a current or former tenant. What information, if any, is disclosed would need to be decided on a case by case basis having regard to GDPR restrictions.

Condition 15(c) – smoking signs

We suggest this clause is deleted. The government acknowledged over 10 years ago that most people were familiar with the no smoking rules and so detailed regulations on no-smoking signs were no longer needed. The challenges of correctly capturing this within a licence condition is not easy. For example, we understand this would not apply within shared accommodation let on a joint tenancy but would apply in the common parts of a property containing individual room lettings. The 'common parts' definition within this condition does not accurately capture that.

Condition 16 – external areas

The wording should be adjusted to recognise that maintaining the outside of the building and communal grounds are not the licence holder's responsibility if they are the long leaseholder of a self-contained flat within a freehold block of flats.

Condition 19 – Compliance Works

It is unclear how this condition is intended to be applied in practice. If any work is deemed necessary, we think it should be included as part of the licence with a clear timescale for compliance.

Condition 26 – Fire routine

Whilst fire procedure signs might be appropriate in a large or high risk HMO with a complex layout, it can be excessive for a shared house occupied by three friends on one joint tenancy. There is a danger that excessive signage and legal notices displayed in the tenant's home creates an unwelcome institutional feel. We would request flexibility to display the information or give a copy to the tenants at the start of the tenancy.

Condition 29 – Compliance with fire safety guidance

We have concerns about the last paragraph which says "*...where the fire safety provisions in place are below the LACORS recommended standard, the Council must be notified of any amendments/alterations*". The LACORS guidance is non-statutory risk based guidance that imposes no prescriptive standards. It does include some case studies but says they are not intended to be applied as prescriptive standards. That requirement should therefore be deleted.

Condition 33 – Absence of the Licence Holder

We assume this condition is intended for situations where the landlord is the licence holder and has decided not to appoint a managing agent. Where the landlord has appointed a safeagent accredited firm to manage their property, and this is disclosed in the licence application, no additional safeguards would be required as the council will already have the managing agent's details on the HMO licence file.

Condition 35 – Training

We would like to make the council aware that safeagent offers two relevant Ofqual regulated qualifications. A Level 2 Foundation Lettings Course (England) and a Level 3 Award in Letting & Property Management (England). These two courses are supplemented by a multitude of CDP courses and Lettings Learning Snacks. You can find more information on our website: <https://safeagents.co.uk/online-courses/>

Condition 36 – documents to displayed

We repeat the comment made earlier that insisting on documents being displayed in the tenant's home can create an unwelcome institutional feel, particularly when the property is let to a small group of friends on one joint tenancy. We would request flexibility to display a copy of the licence, gas safety certificate and energy performance certificate or give copies to the tenants at the start of the tenancy.

Delivering effective enforcement

It is vital that the council have a well-resourced and effective enforcement team to take action against those landlords and agents that seek to evade the licensing scheme.

Without effective enforcement, new regulatory burdens will fall solely on those that apply for a licence whilst the criminal element of the market continue to evade the scheme and operate under the radar. This creates unfair competition for safeagent accredited firms who comply with all their legal responsibilities. They are saddled with extra costs associated with the licence application process and compliance, whilst others evade the scheme completely.

Recognising the important role of letting agents

Letting agents have a critical role to play in effective management of the private rented sector. We would encourage the council to explore mechanisms for effective liaison with letting agents and to acknowledge the benefits of encouraging landlords to use regulated letting agents such as safeagent accredited firms.

Regulation of letting agents

To achieve better regulation of the private rented sector and improve consumer protection, it is important the council takes a holistic approach that extends far beyond the proposed licensing scheme.

Since October 2014, it has been a requirement for all letting agents and property managers to belong to a government-approved redress scheme. In May 2015, new legislation required agents to display all relevant fees, the redress scheme they belong to and whether they belong to a client money protection scheme. On 1 April 2019, new legislation required letting agents and property managers that hold client money to be members of a government approved client money protection scheme. At safeagent we operate one of the six government approved client money protection schemes.

To assist councils in regulating the private rented sector and effectively utilising these enforcement powers, we developed an Effective Enforcement Toolkit. Originally published in June 2016, the second edition was published in 2018. The third and most recent edition of the safeagent Effective Enforcement Toolkit, developed in conjunction with London Trading Standards, was published in 2021. It can be downloaded free of charge from our website:

<https://safeagents.co.uk/wp-content/uploads/2021/11/safeagent-Effective-Enforcement-Toolkit-2021.pdf>

Should you wish to discuss any aspect of this consultation response, please do not hesitate to contact me. Can you also please confirm the outcome of the consultation exercise in due course.

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Brent Council – Additional Licensing Consultation
Consultation on a proposal to reintroduce a borough-wide Additional Licensing scheme for the
London Borough of Brent
Response from Propertymark
April 2025

Background

1. Propertymark is the UK's leading professional body for estate and letting agents, property inventory service providers, commercial agents, auctioneers and valuers, comprising over 18,500 members representing over 12,800 branches. We are member-led with a Board which is made up of practicing agents and we work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry-leading training programme and mandatory Continuing Professional Development.

Overview

2. Brent Council are proposing a new borough wide additional licensing scheme to replace the previous additional licensing scheme that ended on 31 January 2025. The scheme would extend licensing to all HMOs (House in Multiple Occupation) that fall outside the remit of mandatory HMO licensing. This will include HMOs occupied by three or four people and multi-occupied flats in purpose built blocks of flats where the block comprises three or more flats. The council are proposing to include section 257 HMOs within the scheme. These are properties that have been converted into flats where less than two thirds of the flats are owner occupied and the conversion into flats does not comply with the relevant building regulations.

Summary

3. Thank you for the opportunity to respond to the consultation on reintroducing a borough-wide additional licensing scheme in Brent. Propertymark is supportive of efforts made by local authorities to improve housing stock within the private rented sector (PRS). However, we do not think that licensing is the best method to achieve this aim. Accordingly, we object to your proposal. Propertymark would prefer a regulatory framework, which seeks to educate landlords in improving their stock rather than punitive measures that are difficult to enforce and only punish compliant landlords letting those that require improvements to go undetected. We oppose this proposal on several grounds which are set out below.

Licensing structure

4. **Scope of the scheme** – it is disappointing that Brent Council must renew their previous additional licensing scheme for a further five years especially as they have been operating schemes since 2015. This clearly demonstrates that the aims and objections from the previous scheme were not met, and they should find a new way of improving standards. Furthermore, we think that the proposed scheme on a local authority level would be duplicitous with the

provisions of a national landlord's registration scheme being proposed in the Renters' Rights Bill as outlined in the King's Speech 2024¹ and will soon be at Committee Stage in the House of Lords². We would be grateful if Brent Council would clarify if this would be the final phase of the additional licensing scheme as we have intelligence of some local authorities considering a third phase. Additionally, some of the justifications for the scheme would not be from a direct consequence of issues within the PRS, but other housing tenures. We note that in some communities within the London Borough of Brent the percentage of social housing is greater than the percentage of PRS housing. Therefore, it is likely that any social problems within this area are contributed by social housing. Essentially, using a borough-wide scheme is difficult to find the root cause of issues and the Brent should consider targeting their scheme. Given the lack of a targeted approach, it should also be considered that in some areas of Brent, there is a very high proportion of properties that are new builds where standards are high including in the Wembley Park area of the borough. We do not think it would be appropriate to have a scheme in areas where there has been a high proportion of new builds built as the standards are generally very high.

5. **Costs of the scheme** – we hope that Brent Council can clarify how much these schemes will cost. Many additional and selective licensing schemes are a significant investment for local authorities, and we would ask that Councillors consider carefully if such a scheme offers value for money for their residents and is the most cost-effective method to improve the quality of the PRS. We note that the additional licensing scheme is being reintroduced. Accordingly, what has been the overall cumulative cost for the Council in implementing licensing. The costs should include the total costs for the Council in administering property licensing.
6. **Fees** – we recognise that costs to implement schemes are generally more expensive to run in London Boroughs than for other areas. We also recognise that Brent have made significant efforts to keep fees as low as possible for previous schemes. However, with fees of up to £1,040 for an additional licence, the fee is high given the economic challenges and costs faced by landlords operating in the area. It is also high when compared to other local authority licensing schemes including £650 in Newcastle³ and £550 in Liverpool⁴. The fee is also higher compared to fees for many additional licenses schemes in London Boroughs where costs are typically high. We welcome the inclusion of discounts for landlords who are members of an accredited landlord's scheme and where an applicant makes a declaration to confirm no changes to circumstances or property since 1st application and the application is made before the expiry of the existing licence. However, we would recommend that the Council considers further discounts for members of accredited membership organisations such as Propertymark. We are disappointed that no consideration has been given for members of such bodies as being a member of Propertymark demonstrates that the letting agent is suitably qualified, has access to regular training and meets compliance and regulatory standards, so encourage the Council to consider discounts for Propertymark member letting agents. We also note that there is no discount for additional licensed properties which

¹ [The King's Speech 2024 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/speeches/the-king-s-speech-2024)

² [Renters' Rights Bill - Parliamentary Bills - UK Parliament](https://www.parliament.uk/business/bills-and-legislation/bills/renters-rights-bill/)

³ [Fees and Charges.pdf \(newcastle.gov.uk\)](https://www.newcastle.gov.uk/media/1234567/fees-and-charges.pdf)

⁴ [Fees, discounts and exemptions - Liverpool City Council](https://www.liverpoolcitycouncil.gov.uk/media/1234567/fees-discounts-and-exemptions.pdf)

specifically disadvantages landlords with large portfolios. We would welcome clarity on how agents can pay fees and would recommend that in some instances agents may wish to pay by invoice especially if they are administering many property licenses.

7. **Impact of cost-of-living and landlords** - regardless of the fee level, we are concerned these charges will come at a time when landlords are impacted by ongoing mortgage costs, the cost-of-living crisis and the impact fees could have on the ability of landlords to improve standards. Our members have also told us that a common concern from landlords on licensing schemes is that the costs can be extremely high for landlords especially those, as we have just highlighted, as having larger portfolios of properties. These costs are especially high for landlords operating in London Borough's such as Brent.
8. **Impact on supply of homes** - exiting the market is especially a concern for smaller landlords who are more likely to sell their properties and further shrink the supply of much sort after PRS properties leaving remaining private tenants with higher rents. Our research on the shrinkage of the PRS⁵ found 53% of buy to let properties sold in March 2022 left the PRS and that there were 49% less PRS properties to let in March 2022 compared with 2019. In addition to these concerns, those landlords who remain in the market, often have less money to improve conditions from increased costs. If the decision to operate a borough-wide additional licensing scheme across Brent is approved in areas that are already low demand, then there is a concern that landlords currently operating within these areas could invest in neighbouring local authority areas or exit the market altogether. This could result in fewer housing options for people living in Brent communities meaning some people might be forced to find housing options outside the area, change employment or break social ties within the community.
9. **Unintended Consequences** – we are pleased to see that Brent Council acknowledge that the PRS is an important and increasingly growing tenure that is home to many people living within the Borough and home to 1 in 3 families. Renting in Brent can be expensive with a median rent in some Brent post codes for a three bedroom property being £2,448 per calendar month (September 2024⁶). It is likely that many low waged and people in receipt of benefits access the PRS in Brent live in HMO property. We are concerned that landlords may increase rent due to the added and significant costs of licenses. Consequently, some renters living within the Borough will require cheaper accommodation due to being on a low income and the continued challenges in the cost-of-living crisis. We previously outlined the possibility that further legislation could reduce the housing options of the most vulnerable from landlords exiting the market there could be further implications on the rent level for those landlords who remain. As is the general law of supply and demand, if the supply of PRS property reduces, the cost of rent for the remaining properties is likely to rise. With the current demographics of persons accessing the PRS in Brent, there is a very real danger that many low-income families will be priced out of living in the area. This is acknowledged in the Brent Private Rented Sector Housing Strategy 2024 - 2029 document, which states 'whilst an increasing number of people across the country have accessed the private sector to find a

⁵ [A shrinking private rented sector | Propertymark](#)

⁶ [London rents map | London City Hall](#)

home, those households are often impacted most harshly with wider affordability pressures. This is particularly the case for private renters, who spend an average of 31% of their household income on rent in comparison to 27% for those in social rented properties and 18% for homeowners with a mortgage⁷. Considering these concerns, more local authorities that were previously considering adopting a licensing scheme are now putting plans on hold due to the impact licensing can have on supply with Blackburn and Derwen Council being the latest to cancel plans following their consultation to adopt a selective licensing scheme in an area just outside Blackburn town centre⁸.

Improving standards

10. **Property condition** – outside of certain wards, large parts of Brent are characterised as including significant levels of older housing stock. Areas that have these characteristics are often inner-city communities with large section of pre-1919 built housing. Accordingly, a significant amount of investment is required to improve the condition of stock including the energy efficiency of properties. We would be grateful if Brent Council could clarify if they have any proposed financial grants or loans available for landlords to improve stock.
11. **Energy efficiency** - since 1 April 2020, landlords in England and Wales can no longer let or continue to let properties covered by the Minimum Energy Efficiency Standards if they have an Energy Performance Certificate (EPC) rating below E, unless they have a valid exemption in place. The current UK Government are making provisions for revised energy efficiency standards for landlords to meet EPC C by 2030 for existing properties and EPC C by 2028 for new tenancies. According to the consultation document 'the licensing inspection regime will also enable us to identify tenants on low incomes who are living in homes with an E, F or G EPC rating and those who may be affected by fuel poverty. Tenants will be referred to the appropriate services to ensure they receive the available support, and landlords will be advised accordingly'. However, only a very small number of properties would be below EPC E, and these may be exempt. We would be grateful for further clarity for landlords in this regard.
12. **Current enforcement** – Brent Council is experienced in the implementation of Licensing Schemes with the previous schemes. We would be grateful for some clarity on the performance of previous schemes. For example, how many working days did it take for a typical licence application to be processed and issued? The Council also highlight some of the key statistics on their enforcement activity including warning letters, prosecutions, and civil penalties issues. We would be grateful if this data could be broken down by years. We would also be grateful for clarity on the reasons for issuing civil penalties for example, how many were for over-crowding, banning orders or for simply not obtaining the correct license. However, we do acknowledge the strong record Brent has in enforcement from previous schemes.

⁷ [Brent Private Sector Housing Strategy 2024 - 2029](#)

⁸ [Blackburn landlord licensing plan dropped after improvement | Lancashire Telegraph](#)

Engagement

13. **Engagement with landlords and letting agents** - for most cases of substandard accommodation, it is often down to landlord's lack of understanding rather than any intent to provide poor standards. We would like clarity on how Brent Council engages with landlords and property agents including landlord forums, and training opportunities. In addition, we would welcome clarity on how the council encourages landlords and agents to be members of an accredited membership scheme such as Propertymark.
14. To strengthen this engagement, we would be very happy to support the council in engaging with our members and local property agents. A licensing scheme is a very reactive mechanism, and it is far more beneficial to have a programme of education to engage with landlords on helping them improve before a situation gets worse. We would welcome clarity on what training opportunities the council will provide to landlords and agents to help them understand their responsibilities and improve standards. We recognise the council have made strong efforts in this in the past with engagement via the Council's Landlord Forum and an accreditation scheme for local landlords. However, engagement is more credible over a longer more embedded period. Propertymark has a network of Regional Executives and a series of Regional Conferences that take place throughout the year.⁹ We would be very happy to work with the council to engage with local agents over a virtual roundtable discussion on how standards can be improved.

Tackling Anti-Social Behaviour (ASB)

15. Some areas of Brent are integral to the night-time economy within the Borough, and this can include international events such as those held at Wembley Stadium and Wembley Arena. Accordingly, it is likely that Anti-Social Behaviour (ASB) is contributed from a variety of sources outside private tenants.
16. We welcome the multi-agency approach the council has taken in trying to tackle anti-social behaviour including partnership work with the London Fire Brigade and the Metropolitan Police. We would be very happy to support Brent Council in this partnership work. Unfortunately, landlords are not the best equipped to deal with anti-social behaviour and certainly do not have the skills or capacity to deal with some tenants' problems such as mental health or drug and alcohol misuse. As one example, if a landlord or their agent had a tenant that was causing anti-social behaviour, the only tool that the landlord or agent could use would be to seek possession from the tenant under a Section 8 notice. While this would remedy the problem in the short-term, the tenant is likely to still occupy this behaviour and all that has been achieved is that the anti-social behaviour has moved from one part of IBrent to another or another local authority area. In this context, it should be noted that with regards to reducing anti-social behaviour, landlords and their agents can only tackle behaviour within their properties. Effectively, they are managing a contract and not behaviour. Landlords and their agents are not responsible in any form for anti-social behaviour occurring outside the

⁹ <https://www.propertymark.co.uk/about-us/board-and-governance.html>

property. Nevertheless, we would be interested to learn about any partnership work the council are proposing with stakeholders such as the Metropolitan Police in reducing anti-social behaviour within communities including outcomes from the Home Office funded Safer Streets Programme which we have seen effectively delivered in other London Boroughs.

Environmental crime

17. The evidence document has highlighted additional licensing as a tool to tackle environmental crimes such as fly tipping, poor waste, husbandry and street cleaning. Brent also says that there has been a reduction in repeated waste related incidences (such as fly tipping) linked to HMOs. We would be interested in further evidence to highlight this point. Essentially, while we welcome efforts to tackle fly tipping, unless the perpetrator is caught doing the fly tipping or there is some sort of evidence, such as an addressed letter, within the fly tip, then it is impossible to suggest to what extent fly tipping is a problem in the PRS. Even if the link between fly tipping and the PRS could be proved, there is very little that landlords could do for any behaviour outside the tenancy unless the fly tip was done within the grounds of the property.

Selective Licensing and Section 21

18. Propertymark would like clarification on Brent Council's policy concerning helping a landlord when a section 21 notice is served, the property is overcrowded, or the tenant is causing antisocial behaviour, as per the council's consultation. What steps will the Council take to support the landlord? It would be useful if the council were to put a guidance document before introducing the scheme to outline its position regarding helping landlords remove tenants who are manifesting antisocial behaviour. The recent proposed changes to section 21 legislation and how tenancies if implemented could mean landlords will become more risk-averse to taking tenants with a perfect reference and history. We would be willing to work with the council and develop a dispute resolution service with other local authorities.

Improving access to the PRS

19. We understand that an increasing proportion of older and disabled people access the PRS in Brent. Propertymark have called for local authorities to keep a database of adaptable property to sign post older and disabled people into suitable prs housing when there is not appropriate social housing or housing is not near support networks. Given the wealth of data the council must have from previous Licensing schemes, we would be interested to know if any consideration of such a database has been given. We would also welcome further conversations with Brent on improving access particularly for vulnerable groups.

Conclusions and alternatives

20. Propertymark thinks that local authorities need a healthy private rented sector to complement the other housing in an area. This provides a variety of housing types that can meet the needs of both residents and landlords in the area. Appropriate regulation and

enforcement are essential for improving standards and removing criminals from the sector who exploit landlords and tenants. An active enforcement policy that supports good landlords and letting agents is crucial as it will remove those who exploit others and help create a level playing field. It is essential to understand how the sector operates as landlords and letting agents can often be victims of criminal activity and antisocial behaviour with their properties being exploited.

21. If the scheme is approved, the Council should consider providing an annual summary of outcomes to demonstrate to tenants, landlords and letting agents' behaviour improvements and the impact of licensing on the designated area over the scheme's lifetime. This would improve transparency overall. Propertymark has a shared interest with Brent Council in ensuring a high-quality private rented sector but strongly disagrees that the introduction of the proposed measures is the most effective approach to achieve this aim both in the short term and long term.
22. We would welcome the opportunity to work with Brent Council to further engage with our members and property agents in the local area.

Appendix 5 – Letter of support

London Borough of Enfield



Councillor Fleur Donnelly-Jackson

Cabinet Member for Housing & Resident
Services, Brent Council

Please reply to: Cllr Susan Erbil
Cabinet Member for Planning and
Regulatory Services

Email: Susan.erbil@enfield.gov.uk

Phone:

Your Ref:

Date: 5 June 2025

Dear Cllr Donnelly-Jackson

Brent Additional HMO Licensing Scheme

Thank you for providing the opportunity to comment on your consultation regarding the proposal to implement a new borough-wide additional licensing scheme.

Enfield Council fully supports Brent's proposal as we view licensing as a crucial tool for improving property conditions and management standards in the private rented sector.

With a growing number of Brent's residents living in shared accommodation, introducing an additional licensing scheme is essential to ensure tenants have access to safe and decent housing. Through licensing, landlords are required to proactively address property issues and comply with established licence conditions, thereby contributing to better tenancy and management standards, while making it harder for non-compliant landlords to operate.

Your supporting evidence highlights that HMO accommodation in Brent is increasingly prevalent and disproportionately subject to disrepair and hazards. Introducing a new additional licensing scheme is key for protecting residents, particularly vulnerable tenants, by ensuring they have safe, well-maintained living conditions.

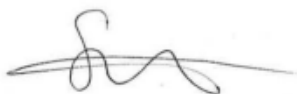
The positive impacts observed in Enfield demonstrate the effectiveness of such schemes in improving property conditions and reducing anti social behaviour. We are fully supportive of this proposal and believe it will continue to benefit Brent's communities.

Executive Director
Environment and Communities
Enfield Council
Civic Centre, Silver Street
Enfield EN1 3XY
www.enfield.gov.uk

? If you need this document in another language or format contact the service using the details above.

I wish you every success building on the achievements of your previous scheme through this new proposal.

Kind regards



Cllr Susan Erbil
Cabinet Member for Planning and Regulatory Services

Enfield Council has launched a series of 14 e-newsletters covering a range of topics that provide residents with more frequent Council news and service updates. More than 40,000 people have already signed up, make sure you're one of them. You can register at www.enfield.gov.uk/newsletters



Krupesh Hirani AM

London Assembly Member for Brent and Harrow



Krupesh Hirani AM
City Hall
Kamal Chunchie Way
London
E16 1ZE

10th June 2025

RE: Brent Additional HMO Licensing Scheme - Help drive up standards for renters in Brent

Dear PRS Partner,

Across the city, Londoners are struggling to find good quality, affordable homes. Rents have continued to rise, and despite positive action taken by the Mayor of London, more than a tenth of privately rented homes fail to meet the Decent Homes Standard.

In Brent, private rented housing accounts for 36% of housing stock. Rising prices and high demand mean that many Londoners are forced to accept living in poor quality, sometimes even dangerous, properties. This experience is particularly acute for disabled, low-income, and vulnerable Londoners who often have more limited choice of rental properties.

We must do all we can to ensure residents living in the private rental sector are in good quality, well-maintained properties owned by landlords who are held to account.

That is why I support Brent Council's application to expand HMO licensing. This will ensure the council can take a more proactive approach to improve renters' safety and standard of living. Licensing will add clarity regarding property management standards and will help to level the playing field, ensuring that any rogue landlords operating in Brent are held to account.

Effective licensing will also help to create safer and more comfortable communities by reducing anti-social behaviour and cleaning up our streets. Additional licensing will require landlords to properly investigate and address any anti-social behaviour complaints and will help regulate neighbourhood noise by helping landlords ensure tenants comply with rental conditions. Managing overcrowding and setting requirements on waste management provision per occupant will also help to reduce fly-tipping and enable proper waste and recycling processes.

Telephone: 020 7983 4377 **Email:** krupesh.hirani@london.gov.uk
Website: www.krupesh.co.uk **Facebook / X / Instagram:** @KrupeshHirani



Since additional HMO licensing was first introduced in 2015, Brent Council has seen positive improvements in the standard of living for tenants in shared properties, with over 5,000 licenses granted. Across London, rents are set to continue rising, and it is expected that the number of private renters in London will grow. Brent Council must ensure it can continue protecting its renters by ensuring landlords comply with strong conditions, thereby protecting those who are most vulnerable.

As the Assembly Member for Brent and Harrow, I strongly support the Council's application to extend HMO licensing. I hope that this additional licensing can come into force from Autumn 2025 and will further protect our renters from poor-quality housing, uncontrolled anti-social behaviour, and overcrowding.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Krupesh Hirani".

Krupesh Hirani AM
London Assembly Member for Brent and Harrow

Telephone: 020 7983 4377 **Email:** krupesh.hirani@london.gov.uk
Website: www.krupesh.co.uk **Facebook / X / Instagram:** @KrupeshHirani

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Improving the Private Rented Sector in Brent

Additional HMO Licensing Consultation

**Brent Council's response to comments
and representations received during
the public consultation**

Contents

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1. Introduction

In order to improve the standard of privately rented property in the borough, Brent Council is proposing to introduce a boroughwide additional HMO licensing scheme which will apply to all HMOs (excluding those licensed through the mandatory HMO licensing scheme). During the consultation, the Council received a range of responses regarding the proposed new scheme and the wider private rented sector in Brent. The Housing Act 2004 requires the Council to consider any representations made in accordance with the consultation which are not withdrawn. The following is the Council's formal response to these representations, which have been considered and have informed a number of changes to the proposed schemes.

2. Changes made to the proposed scheme in response to consultation feedback

Licence Conditions

In response to the consultation feedback, the Council has **amended 3** proposed licence conditions.

Condition Number	Condition Subject
6	Rent Payments
16	External Areas
26	Fire Routine Notice

Details about these changes, including original conditions, comments and agreed amendments can be found in Section 4.1 of this report

3. Positive responses to the proposed scheme

The Council would like to acknowledge some of the comments received during the consultation in support of the proposed scheme. These have helped to validate the Council's approach and highlight the strengths of the proposal, which will be built upon to make the scheme even more effective.

This is an excellent initiative - well done Brent. Irresponsible landlords need to be forced to fit and proper landlords.

This is such a huge area of focus - i'm really happy brent are addressing it. there needs to be further regulation

I am fully agree with HMO license it makes safe housing for teannat and some tax income for Brent

4. Main themes from consultation feedback

The consultation focused on the extent to which respondents agree or disagree with the Council's proposal to introduce the additional HMO licensing scheme. The consultation also looked at views on the proposed licence conditions, fees, discounts and scheme objectives

The consultation questionnaire featured free text boxes which provided respondents with opportunities to comment on the proposals in their own words, specifically:

- If you disagree with the proposals for an additional HMO licensing scheme, please explain why
- [If you disagree with the proposal for an additional HMO licensing scheme] What alternatives do you think should be considered to address the problems?
- If you disagree with any of the discretionary conditions for additional HMO licensing, please explain why
- If you disagree with any of the objectives for additional HMO licensing, please explain why
- The Council wants to make sure that additional HMOs are safe and well-managed. Do you have any other suggestions the Council should consider in helping improve the condition and management of HMOs in Brent?

The comments and feedback from the online survey, written representations received and those made during online public forum events have been analysed and categorised into themes. The Council's response to these comments and themes are shown in the sections below.

4.1 Licence conditions

The following section outlines the comments received about *specific* licence conditions.

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Condition number	Condition text	Example comment	Source	Council response
Note 5	The property licence must be displayed within a communal area of the property and a copy of the conditions should be made available to all the occupying tenants.	<i>Insisting a property licence must be displayed in the tenant's home can create an unwelcome institutional feel, particularly when the property is let to a small group of friends on one joint tenancy agreement. We would request flexibility to display a copy of the licence or give a copy to the tenants at the start of the tenancy. If this is intended as an enforceable licence condition, it should also be moved from 'Notes' into licence conditions</i>	Safeagent	This note is consistent with the HMO Management Regulations, which requires certain information to be clearly displayed in a prominent position within the HMO.
3	The licence holder must ensure that the number of occupiers and households allowed to occupy the property will relate to the amenities that are provided within the property and the size and layout of the rooms available as decided by the Council at the time of licence approval.	<i>We are unsure what this condition means in practice. It is for the local authority to assess the maximum occupancy limit when the licence is granted, and the responsibility of the licence holder to comply with that limit. If the purpose of this condition is simply to reinforce this point, we would suggest it is reworded so the meaning is clear.</i>	Safeagent	<p>The purpose of this condition is to ensure that the number of occupiers and households residing in a licensed property is appropriate to the size, layout, and available amenities, in line with the Council's adopted standards.</p> <p>While it is correct that the Council determines the maximum permitted occupancy at the point of licence approval, this determination is based on the information provided in the application, without a pre-licence inspection.</p>

Condition number	Condition text	Example comment	Source	Council response
				<p>The condition serves to reinforce the licence holder's ongoing responsibility to ensure that the property remains suitable for the number of occupiers permitted. This includes maintaining the property in a condition that continues to meet the required standards for space and amenities, as verified during the compliance inspection.</p> <p>We acknowledge your suggestion regarding clarity. However, our experience to date indicates that landlords have not raised concerns about the wording of this condition.</p>
	<p>The licence holder must demand references from persons who wish to occupy the HMO.</p> <p>No new occupiers should be allowed to occupy the property if they are unable to provide a suitable reference. When referencing consideration must be given to the tenant's history, credit and right to rent checks.</p> <p>The licence holder must provide evidence of such reference and checks carried out when</p>	<p><i>We would encourage the Council to review this referencing condition. The wording should be sufficiently broad to avoid excluding vulnerable groups from the private rented sector. For example, prison leavers, people granted asylum, people fleeing domestic violence and homeless people trying to move into secure accommodation may all struggle to source a reference. We would ask that the Council consider the risk of exclusion as part of the equalities impact assessment and make any</i></p>	Safeagent	<p>The Council agrees that the absence of references should not automatically disqualify individuals from being considered for a tenancy, particularly in cases involving vulnerable groups.</p> <p>Enforcement action is considered on a case-by-case basis and factors impacting on the ability to obtain references will be taken into consideration. However, the Council agrees to reword the condition as follows:</p> <p>No new occupiers shall be allowed to occupy the house if they are unable to provide suitable references. (References should be as</p>

Condition number	Condition text	Example comment	Source	Council response
	requested by the Council within 14 days on demand.	<i>necessary adjustments to avoid that happening.</i>		<p>a minimum, checks to ensure the tenants identity, whether they have the right to rent a property [see https://www.gov.uk/check-tenant-right-to-rent-documents/who-to-check], their ability to pay rent and their past history as a tenant.)</p> <p>The licence holder must provide evidence of such reference and checks carried out when requested by the Council within 14 days on demand.</p>
Page 317	<p>The licence holder must protect any deposits taken from the occupiers under an assured short hold tenancy agreement by placing them in a statutory tenancy deposit scheme.</p> <p>Information about the scheme being used must be given to the occupier at the time the deposit is taken. When requested this information must be provided to the Council within 14 days on demand.</p>	<i>This condition duplicates condition 7 and relates to tenancy deposits. It also incorrectly says tenancy deposit information must be provided at the time the deposit is taken, whereas condition 7 correctly explains the timescale is within 30 days. This condition should be deleted.</i>	Safeagent	<p>The Council agrees to amend the wording of condition 6 to the following:</p> <p><i>6. Rent payments</i> <i>The licence holder must ensure that there is a record of all rent payments received in respect of the property. Evidence of rent records must be provided to the Council within 14 days on demand</i></p>
8	The Licence Holder must ensure that all tenants are given a	<i>We think it is excessive to require every private landlord, even if they</i>	Safeagent	We note your reference to the forthcoming Renters' Rights Bill, which includes provisions

Condition number	Condition text	Example comment	Source	Council response
Page 318	<p>suitable written complaints procedure at the start of their tenancy.</p> <p>The procedure must include how complaints of the property conditions will be handled.</p>	<p><i>let out just one property, to develop a written complaints procedure. The condition also fails to make clear if this is referring to complaints about something the landlord has, or has not done, or whether it is referring to repair reporting arrangements which are something quite different. With the Renters Right Bill soon to implement a national landlord register and a mandatory landlord redress scheme, we would suggest this condition be deleted and let the new legislative framework to cover this topic.</i></p>		<p>to establish a Private Rented Sector Landlord Ombudsman. This new body is expected to offer a comprehensive and impartial mechanism for resolving tenant complaints, thereby strengthening accountability and transparency across the sector.</p> <p>In light of these anticipated reforms, we agree that it may be appropriate to review local licensing conditions to ensure alignment with the emerging national legislative framework. Accordingly, we will consider the necessity and wording of this particular condition, with a view to either refining it for greater clarity or removing it altogether, subject to the full implementation of the Renters' Rights Bill and associated regulations.</p>
	<p>9</p> <p>The licence holder must take reasonable and practical action to prevent or reduce anti-social behaviour by the occupiers of the property or their visitors.</p> <p>The licence holder must ensure that the occupiers of the property receive written confirmation detailing the procedure in place to</p>	<p><i>We think it is excessive to require every private landlord, even if they let out just one property, to develop a written procedure to tackle any ASB that might occur, and to provide a copy to every tenant at the start of their tenancy. What might be appropriate for a large public sector landlord like the local authority or an institutional build to rent</i></p>	Safeagent	<p>The Council's intention is to promote transparency and ensure that tenants are aware of the expectations and consequences relating to ASB from the outset of their tenancy. We will apply a proportionate approach when reviewing procedures taking into account the size and capacity of the landlords operations.</p>

Condition number	Condition text	Example comment	Source	Council response
	deal with anti-social behaviour at the start of their tenancy. Please refer to 12a and 12b below.	<i>landlord, may not be reasonable for every small private landlord. We would suggest more general wording that requires the licence holder to take all reasonable and practicable steps in accordance with the procedure outlined in condition 9b.</i>		
9a	<p>To help prevent anti-social behaviour occurring the licence holder must:</p> <ul style="list-style-type: none"> i. Obtain tenant references prior to granting a tenancy as to their previous conduct, and be satisfied that they are not likely to cause any anti- social behaviour. ii. Ask anyone wishing to occupy the property to disclose unspent criminal convictions. If unspent criminal convictions are disclosed the licence holder must consider if those convictions indicate a risk that the person is likely to commit acts of anti-social behaviour, before granting a tenancy. 	<i>In relation to 9a(i), we disagree with the prescriptive requirement a private landlord cannot allow anyone to rent a property in the borough unless they are satisfied they are not likely to cause anti-social behaviour. This has huge implications for exclusion. It could also effectively stop Councils using the private rented sector to house chaotic families in temporary accommodation. We would invite the Council to consider where families can live if they cannot afford to buy a home, are not eligible for Council housing and yet are excluded from the private rented sector by this clause. We would strongly encourage the Council to delete or substantially amend this clause.</i>	Safeagent	<p><u>Condition 9a(i)</u></p> <p>The purpose of condition 9a(i) is to encourage landlords to undertake reasonable due diligence when selecting tenants, not to impose an absolute bar on individuals with complex needs. Landlords should make informed decisions based on available references and information, without creating undue barriers to housing access.</p> <p><u>Condition 9a(ii)</u></p> <p>We appreciate the concerns regarding the handling of sensitive personal data under the General Data Protection Regulation (GDPR). The Council agrees that any request for disclosure of unspent convictions must be lawful, proportionate, and compliant with data protection legislation. We will seek legal advice to ensure that this condition is appropriately framed.</p>

Condition number	Condition text	Example comment	Source	Council response
Page 320	iii. Respond to any reference requests received for a current or former tenant from another licence holder in writing within 21 days.	<i>We equally have concerns about condition 9a(ii). Criminal convictions, whether spent or unspent, are sensitive personal data under GDPR for which additional data handling restrictions apply. We do not think it is appropriate, and potentially not lawful, for the Council to insist landlords obtain this information from every prospective tenant. We would encourage the Council to seek legal advice and also seek input from the Information Commissioner's Office to ensure no sensitive data handling breach occurs. We also think it is highly irregular for a landlord or agent to be required to review a tenant's criminal convictions and decide if they should be excluded from renting a property in Brent.</i>		<u>Condition 9a(iv)</u> We acknowledge your concerns regarding the disclosure of information in tenant references. The Council's intention is to promote responsible information sharing between landlords, not to mandate the disclosure of personal data in breach of data protection laws.
	iv. When giving a reference state whether or not they are aware of any allegations of anti-social behaviour made against the tenant. If allegations have been made, they must give details, to the best of their knowledge, of whether the allegations have been admitted or have been found proven in any court or tribunal.			We will review the condition to ensure it reflects that any disclosures must be made in accordance with GDPR and based on factual, documented incidents.
	v. Make, a minimum of quarterly inspections of the property to ensure that it is in a decent state of repair and that the occupiers are not in breach of tenancy terms and conditions.	<i>In relation to 9a(iv), we do not agree the Council can stipulate what information must be disclosed to a third party when providing a reference for a current or former tenant. What information, if any, is disclosed would need to be decided</i>		
	vi. Ensure that all tenants are aware that if they or their visitors behave in a way that			

Condition number	Condition text	Example comment	Source	Council response
	the licence holder, manager or Council considers to be anti-social they may face eviction.	<i>on a case by case basis having regard to GDPR restrictions.</i>		
9b	v: Make, a minimum of quarterly inspections of the property to ensure that it is in a decent state of repair and that the occupiers are not in breach of tenancy terms and conditions.	This feels like quite an imposition on the tenants, to have to have their home inspected every 3 months. Feels like it's treating them like untrustworthy students. I would've hated it when I was a renter.	Consultation survey comments	The Council considers that due to the higher risk factors associated with HMO properties, it is appropriate to require landlords to inspect HMOs every three months.
15(c)	<p>The Licence holder must ensure that:</p> <ul style="list-style-type: none"> a. The common parts in the premises are kept free from obstruction, in a clean condition and in good order and repair. b. Common areas, including shared living rooms, kitchens, and hallways are 	<i>We suggest this clause is deleted. The government acknowledged over 10 years ago that most people were familiar with the no smoking rules and so detailed regulations on no-smoking signs were no longer needed. The challenges of correctly capturing this within a licence condition is not easy. For example, we understand this would not apply within shared accommodation let on a joint tenancy but would apply in</i>	Safeagent	<p>While it is true that the legal obligation to display no-smoking signs has been reduced, the Health Act 2006 continues to impose a legal duty on those responsible for managing smoke-free premises to ensure that at least one compliant no-smoking sign is displayed in a prominent position at each entrance.</p> <p>The condition is intended to reinforce this statutory duty and to promote clarity for both landlords and tenants.</p>

Condition number	Condition text	Example comment	Source	Council response
Page 322	<p>not used for sleeping by tenants or their guests.</p> <p>c. Smoking is not permitted in any common area and 'no smoking' signs are clearly displayed (Health Act 2006)</p>	<p><i>the common parts of a property containing individual room lettings. The 'common parts' definition within this condition does not accurately capture that.</i></p>		<p>It applies specifically to common parts of properties that fall within the definition of smoke-free premises, which includes areas shared by occupants of separate dwellings—such as in HMOs or properties let on individual room agreements .</p>
	<p>For the purposes of this condition "common parts" means—</p> <p>(i)the entrance door to the HMO and the entrance doors leading to each unit of living accommodation within the HMO; and</p> <p>(ii)all such parts of the HMO as comprise staircases, lifts, passageways, corridors, halls, lobbies, entrances, balconies, porches and steps that are used by the occupiers of the units of living accommodation within the HMO to gain access to the entrance doors of their respective unit of living accommodation.</p>			

Page 323

Condition number	Condition text	Example comment	Source	Council response
16	<p>The licence holder must ensure that:</p> <ul style="list-style-type: none"> a. The exterior of the property including the roof, walls, drainage, window and door elements are maintained in a reasonable decorative order and state of repair. b. Gardens, fencing, paths, etc., and other external elements are kept in a clean, clear and/or sound condition. c. Outbuildings such as garages, sheds are properly maintained and are not used for sleeping purposes 	<p><i>The wording should be adjusted to recognise that maintaining the outside of the building and communal grounds are not the licence holder's responsibility if they are the long leaseholder of a self-contained flat within a freehold block of flats.</i></p>	Safeagent	<p>The intent of this condition is to ensure that properties let under licence are maintained to a reasonable standard and do not contribute to environmental degradation or nuisance. However, we recognise that licence holders should not be held accountable for matters outside their legal control. Accordingly, the Council will amend the condition as follows:</p> <p>Licence holders, within their legal responsibilities must ensure that:</p> <ul style="list-style-type: none"> d. The exterior of the property including the roof, walls, drainage, window and door elements are maintained in a reasonable decorative order and state of repair. e. Gardens, fencing, paths, etc., and other external elements are kept in a clean, clear and/or sound condition. f. Outbuildings such as garages, sheds are properly maintained and are not used for sleeping purposes
19	<p>The Licence holder must ensure that any works found to be necessary by the Council to ensure that the property complies with the Council's standards for</p>	<p><i>It is unclear how this condition is intended to be applied in practice. If any work is deemed necessary, we think it should be included as part of the licence with a clear timescale for compliance.</i></p>	Safeagent	<p>A compliance schedule will be provided to the licence holder after the property has been assessed. This will clearly identify any works required and the timeframe within which the works must be completed.</p>

Condition number	Condition text	Example comment	Source	Council response
	HMOs, are carried out within the specified time period given.			
26	<p>The licence holder should ensure that all residents are fully aware of the procedures to be followed in the event of a fire.</p> <p>They should also ensure that the fire routine notice detailing action to be taken in the event of fire, is clearly worded and displayed in a central location e.g. next to the main entrance/exits.</p>	<p><i>Whilst fire procedure signs might be appropriate in a large or high risk HMO with a complex layout, it can be excessive for a shared house occupied by three friends on one joint tenancy. There is a danger that excessive signage and legal notices displayed in the tenant's home creates an unwelcome institutional feel. We would request flexibility to display the information or give a copy to the tenants at the start of the tenancy.</i></p>	Safeagent	<p>The intention of this condition is to ensure that all residents are informed of the fire safety procedures relevant to the property. While displaying a fire routine notice in a central location (e.g. near the main entrance/exit) is considered best practice particularly in larger or higher-risk HMOs - we accept that in smaller, lower-risk properties, alternative methods may be suitable.</p> <p>The condition will be amended as follows:</p> <p>The licence holder should ensure that all residents are fully aware of the procedures to be followed in the event of a fire.</p> <p>They should also ensure that the fire routine notice detailing action to be taken in the event of fire, is clearly worded and displayed in a central location e.g. next to the main entrance/exits or a copy of the fire procedure is provided to each tenant at the start of their tenancy.</p>

Condition number	Condition text	Example comment	Source	Council response
				For larger HMOs i.e. 5 or more occupiers and/or high-risk HMO with a complex layout, the fire procedure signs must be displayed
29	<p>The licence holder must ensure that all means of escape from fire are free from obstruction and that adequate fire precautions are maintained.</p> <p>In determining adequate fire precautions reference should be made to the LACoRS guidance: HOUSING – FIRE SAFETY, Guidance on fire safety provisions for certain types of existing housing</p> <p>N.B. where the fire safety provisions in place are below the LACoRS recommended standard, the Council must be notified of any amendments/alterations.</p>	<p><i>We have concerns about the last paragraph which says "...where the fire safety provisions in place are below the LACORS recommended standard, the Council must be notified of any amendments/alterations". The LACORS guidance is non statutory risk based guidance that imposes no prescriptive standards. It does include some case studies but says they are not intended to be applied as prescriptive standards. That requirement should therefore be deleted.</i></p>	Safeagent	<p>Although LACoRS guidance is non-statutory it is widely recognised as a benchmark for good practice and is commonly used by local authorities to inform risk assessments and enforcement decisions.</p> <p>The purpose of the notification requirement is not to enforce the LACoRS guidance as a rigid standard, but to ensure the Council is informed when alternative safety measures are used. This allows us to assess whether they are suitable for the specific property.</p> <p>Where a licence holder adopts measures that significantly differ from commonly recommended approaches, it is reasonable for the Council to be notified. This enables a case-by-case evaluation to ensure that resident safety is not compromised.</p>
33	The licence holder is required to have in place suitable emergency management arrangements in the event of their absence. These	<i>We assume this condition is intended for situations where the landlord is the licence holder and has decided not to appoint a managing agent.</i>	Safeagent	Accepted

Condition number	Condition text	Example comment	Source	Council response
35	<p>details must be given to the occupiers and displayed in a prominent place in a common area, preferably near to the entrance door.</p> <p>Should the Licence Holder be unable to fulfil the licence conditions he should appoint a person to manage the HMO during the period of the licence, he must:</p> <ol style="list-style-type: none"> Obtain from the manager a signed declaration identifying the licence conditions by which he agrees to be bound, and that the manager understands the consequences of failing to comply with the licence conditions; Provide the Council a copy of the signed declaration within 14 days of the said change of circumstance. 	<p><i>Where the landlord has appointed a safeagent accredited firm to manage their property, and this is disclosed in the licence application, no additional safeguards would be required as the Council will already have the managing agent's details on the HMO licence file.</i></p>		
	The licence holder and/or manager may be required by the Council to attend an accredited	<p><i>We would like to make the Council aware that safeagent offers two relevant Ofqual regulated</i></p>		We would be happy to look at the training support Safeagent could provide to landlords in Brent.

Condition number	Condition text	Example comment	Source	Council response
	management training course, in the event of significant and/or continuous deficiencies in the supervision and/or maintenance of a licensed HMO being identified by the Council.	<i>qualifications. A Level 2 Foundation Lettings Course (England) and a Level 3 Award in Letting & Property Management (England). These two courses are supplemented by a multitude of CDP courses and Lettings Learning Snacks. You can find more information on our website: https://safeagents.co.uk/online-courses/</i>		
36 Page 327	<p>The following documents should be displayed in a prominent position in a common area, preferably near the entrance door:</p> <p>a. A copy of the licence (incorporating where the licence conditions can be viewed).</p> <p>b. A Copy of the current Gas Safety Certificate.</p> <p>c. The name, address and telephone number (including an emergency contact number, if</p>	<i>We repeat the comment made earlier that insisting on documents being displayed in the tenant's home can create an unwelcome institutional feel, particularly when the property is let to a small group of friends on one joint tenancy. We would request flexibility to display a copy of the licence, gas safety certificate and energy performance certificate or give copies to the tenants at the start of the tenancy.</i>	Safeagent	This condition is consistent with the HMO Management Regulations, which requires certain information to be clearly displayed in a prominent position within the HMO.

Condition number	Condition text	Example comment	Source	Council response
	different) of the Licensee and/or Manager of the premises. d. Energy Performance Certificate(s) (EPC) carried out for new tenancies.			

4.2 General comments about licence conditions

The following outlines comments received about the licence conditions *generally*.

Theme	Issue	Example comment	Source	Council response
Disagreement with (any) conditions/scheme, broadness/vagueness of conditions	Respondents expressed that they believed the conditions and scheme themselves were unnecessary (and onerous) or, that the conditions were too broad and/or vague	<i>The conditions seemed to cover everything, just not sure what is meant by mandatory and discretionary conditions.</i>	Consultation survey comments	<p>The purpose of these licence conditions is not to impose unnecessary burdens on landlords, but to ensure that tenants are protected from unsafe or poorly maintained HMOs, and that consistent standards are upheld across the private rented sector. They also serve to support responsible landlords by creating a level playing field and addressing poor property management where it occurs.</p> <p>The Council considers the proposed conditions necessary, proportionate, and reasonable to improve safety, quality, and accountability in HMOs. While many landlords already meet these standards, licensing provides a vital mechanism to act where minimum requirements are not met.</p>
		<i>The discretionary conditions will apply a prohibitive burden of costs on landlords which will likely make then letting of some properties no longer viable and therefore make worse the housing crisis. The mandatory regulations that are already in place are sufficient.</i>		
		<i>After reading the conditions, I am still not quite sure what is meant by discretionary conditions. Hence the I don't know.</i>		

4.3 Fees, discounts and the financial impact of the scheme

Theme	Issue	Example comment	Source	Council response
Cost of licence fee	<p>Respondents expressed concern that the proposed fee is too high, and will create an unnecessary financial burden on landlords, which could be passed to tenants. Also, considered to be high when compared to other Councils</p>	<i>Adds additional costs to landlords which will then be passed on to tenants in increased rents. Council already has sufficient powers to deal with any reported problems.</i>	<p>Consultation survey comments, PropertyMark</p>	<p>The proposed fee has been calculated based on the cost of setting up and operating the licensing schemes. The aim is to ensure that the costs are covered by the expected income from the number of licence applications that the Council anticipates under the proposed designations. Councils are not permitted to make a profit from licensing schemes and careful consideration and financial modelling has gone into the licence fees and discounts.</p> <p>An additional HMO licence obtained at the start of the scheme will pay a one-off fee of £1040 for a 5-year licence, which equates to £4 per week. The Council has also elected to offer a discount to eligible landlords in order to reward and incentivise high property management standards.</p> <p>Whilst the Council recognises that the licence fee is a cost to the landlord, this is not considered unaffordable compared to the average rental income obtainable in Brent at present. According to the ONS, the average monthly rental price in Brent is currently £2067 (meaning that the additional HMO licence fee would represent a less than</p>
		<i>All additional costs will be passed to tenants, along with additional costs to cover extra administrative time.</i>		
		<i>It's a huge amount of money for a license fee.</i>		
		<i>we recognise that costs to implement schemes are generally more expensive to run in London Boroughs than for other areas. We also recognise that Brent have made significant efforts to keep fees as low as possible for previous schemes. However, with fees of up to £1,040 for an additional licence, the fee is high given the economic challenges and costs faced by landlords operating in the area. It is also</i>		

Theme	Issue	Example comment	Source	Council response
		<i>high when compared to other local authority licensing schemes including £650 in Newcastle and £550 in Liverpool. The fee is also higher compared to fees for many additional licenses schemes in London Boroughs where costs are typically high.</i>		<p>one percent reduction in rental revenue for the average property).</p> <p>The Council notes that the boroughs mentioned in the Propertymark submission are not neighbouring Brent. The total cost of an HMO licence in Liverpool is £1283 and not the £550 referenced.</p> <p>In regard to Newcastle the fee of £650 quoted is for part 2 of a selective licence or part 2 of a renewal of a mandatory HMO licence; the whole fee for an additional HMO licence in Newcastle is £1000 . Given the average monthly private rental cost in Newcastle was £1097 in April 2025 , and the average for Brent was £2067 for the same period, as a proportion of average monthly rent, Brent's licence fee is lower than Newcastle's.</p> <p>The proposed additional HMO licence fee is also below many other London Councils, including Waltham Forest (£1200), Southwark (£1300) and Lambeth (£1518). As a result of inflation the costs of administering and enforcing licensing schemes has also risen, leading to higher fees in more recent schemes.</p>

Theme	Issue	Example comment	Source	Council response
				We are mindful of financial pressures that landlords may currently be under. Landlords are encouraged to claim reasonable business expenses related to rental properties which may help reduce their tax bill.
Opposed to extra £25 per room fee if there are more than five habitable rooms. Page 332	Respondents expressed concern that the additional surcharge is makes the fee structure complicated	<p><i>We understand the Council is intending to charge an additional licence application fee of £1,040 plus an extra £25/ room if there are more than five habitable rooms.</i></p> <p><i>We think the extra £25 / room if there are more than five habitable rooms causes unnecessary complication, particularly as most additional licences will be for properties with two, three or four bedrooms. It creates confusion about how to classify an open plan kitchen / dining / living room and could have the unintended consequence of discouraging shared living or dining rooms and space to study. We would encourage the Council to remove this extra cost.</i></p>	Safeagent	<p>The Council considers its fee structure to be fair, proportionate, and reflects the additional resources required to assess larger properties.</p> <p>Properties with more than five habitable rooms typically require more intensive inspection and regulatory oversight. The additional £25 per room helps cover the cost of officer time and administrative processing, ensuring that the scheme remains cost-neutral to the Council and funded by those who benefit from or create greater regulatory demand.</p> <p>The majority of licensed properties are expected to fall below the five-room threshold, meaning this surcharge will apply only in a minority of cases. The Council will provide clear guidance on how habitable rooms are defined, including treatment of open-plan spaces, to minimise confusion and ensure consistency.</p>

Theme	Issue	Example comment	Source	Council response
				This fee structure has been in place for over a decade without significant issues being raised. Nonetheless, we will continue to monitor its implementation and remain open to reviewing the approach if substantive concerns are identified.
Costs of implementing the scheme and value for money Page 333	Concern about whether the scheme is the most cost-effective method of improving the PRS.	<i>We hope that Brent Council can clarify how much these schemes will cost. Many additional and selective licensing schemes are a significant investment for local authorities, and we would ask that Councillors consider carefully if such a scheme offers value for money for their residents and is the most cost-effective method to improve the quality of the PRS. We note that the additional licensing scheme is being reintroduced. Accordingly, what has been the overall cumulative cost for the Council in implementing licensing. The costs should include the total costs for the Council in administering property licensing.</i>	PropertyMark submission	The licence scheme is designed to be cost neutral and will not make a profit; the fee has been designed to be as low as possible whilst ensuring the cost of the licensing scheme is covered.
Licence Renewal Discount	Respondents suggest the scope of the	<i>We welcome the proposed £100 discount for licence renewals.</i>		The Council will not be offering a discount. However, it will accept licence applications at

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Theme	Issue	Example comment	Source	Council response
	proposed £100 renewal discount be extended to landlords and agents licensed under the previous scheme	<i>However, we note is says the discount will only be offered if the renewal application is submitted before the expiry of the existing licence. Given the significant gap between the old scheme ending and new scheme starting, this could unfairly impact on landlords with licences that expired before the new scheme was implemented. If the scheme is renewed, we would recommend this discount is extended to all landlords and 4 agents licensed under the previous scheme provided their renewal application is submitted within three months of any new scheme being introduced.</i>		the previous fee of £840 per licence, during the transitional period between Cabinet approval being granted, and the scheme formally going live. This period is anticipated to run from November 2025 to end of January 2026.
Landlord Accreditation Discount Eligibility	Respondents suggested firms eligible for accreditation discount be widen	<i>We note Brent Council is proposing a £40 accreditation discount and says this is restricted to landlords and managing agents accredited through the London Landlord Accreditation Scheme. We express concern that this appears to exclude safeagent accredited firms. We believe firms that pass our stringent annual verification</i>	Safeagent	The council have a partnership working group with LLAS as part of London alliance. The council welcomes the opportunity to continue working and communicating with Safeagent and other landlord groups on how their members can best engage with the scheme.

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Theme	Issue	Example comment	Source	Council response
		<i>checks to obtain accreditation status, including redress scheme membership and client money protection for any client funds held, should be eligible for the accreditation discount. We would encourage the Council to give this matter further consideration. It incentivises landlords to appoint an accredited managing agent and drive up standards in the private rented sector.</i>		
		<i>We are disappointed that no consideration has been given for members of such bodies as being a member of Propertymark demonstrates that the letting agent is suitably qualified, has access to regular training and meets compliance and regulatory standards, so encourage the Council to consider discounts for Propertymark member letting agents</i>	Propertymark	
Accreditation discount should be increased	Concern about the type and level of discounts applied, and suggestion to widen the scope of	<i>We note the accreditation discount says it only applies to 'first time applications'. We would not support this approach</i>	Safeagent, Propertymark	Part A of the licence fee covers the cost of processing, administration and validation of the application, including inspection. The overall administrative burden remains

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Theme	Issue	Example comment	Source	Council response
	the accredited landlord discount	<i>as it is equally important to incentivise accreditation when licences are renewed.</i>		<p>significant; the licence fee is set to reflect this and as such a reduced fee has not been afforded for a subsequent licence.</p> <p>The Council has taken into account the recommendation of an increase in the scope and amount of the accredited landlord discount but concludes that the current discount is a sufficient incentive and reward,</p>
		We encourage the Council to increase the accreditation discount which represents less than 4% of the licence application fee. We note some Councils offer accreditation discounts up to 20%.		
		We also note that there is no discount for additional licensed properties which specifically disadvantages landlords with large portfolios.		
Money-making scheme	Respondents express belief that the scheme is a means of revenue-generation for the Council rather than a means of improving the PRS.	<p><i>The new licensing process feels more like an extra tax than anything else. There are very little checks and the cost is very high.</i></p> <p><i>This is nothing more than a money generation / taxation scheme for the Council that won't improve conditions for tenants!</i></p>	Consultation survey comments	Under the law, the Council is not allowed to make money from the licensing scheme. The proposed fee has been calculated based on the cost of setting up and operating the licensing scheme, so that the costs would be met by the expected income from the number of licence applications the Council anticipate, under the proposed designations.

Theme	Issue	Example comment	Source	Council response
		<i>Licencing is just a money earner for the Council with no social benefit.</i>		The fee will be kept under annual review to ensure the scheme remains cost neutral.
Cost of raising standards of older properties	Concern about the cost to landlords of raising the standard of pre-1919 housing stock, particularly in relation to energy-efficiency, and a request for clarity over available grants and loans	<i>Outside of certain wards, large parts of Brent are characterised as including significant levels of older housing stock. Areas that have these characteristics are often inner-city communities with large section of pre-1919 built housing. Accordingly, a significant amount of investment is required to improve the condition of stock including the energy efficiency of properties. We would be grateful if Brent Council could clarify if they have any proposed financial grants or loans available for landlords to improve stock.</i>	Propertymark	<p>The Council currently offers empty property grants. Further details can be found on the Council's website. We also intend to seek funding from sources such as MHCLG, DESNZ, and others to support property improvement initiatives.</p> <p>The Council currently offers financial support through empty property grants, aimed at bringing vacant homes back into use and improving housing standards. Full details of these grants, including eligibility criteria and application procedures, are available on the Council's website.</p> <p>In addition to this, the Council is actively exploring opportunities to secure external funding from national bodies such as MHCLG and DESNZ, and other relevant agencies. These funding streams will be used to support wider property improvement initiatives across the borough, helping to enhance housing quality, energy efficiency, and overall living conditions for residents.</p>
Effect on rental supply and prices	Respondents expressed concern that property	<i>There is a growing demand for simple, affordable, and clean</i>	Consultation survey	From administering its HMO licensing schemes, the Council has seen no evidence

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Theme	Issue	Example comment	Source	Council response
	licensing could cause landlords to leave the market/sell up, decreasing housing supply and increasing the price of renting within the borough	<p><i>accommodation. However, the increasing number of regulatory schemes and additional costs being imposed on landlords will inevitably lead to these expenses being passed on to tenants.</i></p> <p><i>exiting the market is especially a concern for smaller landlords who are more likely to sell their properties and further shrink the supply of much sort after PRS properties leaving remaining private tenants with higher rents</i></p> <p><i>Because it will put off landlords from renting and will reduce availability for tenants.</i></p> <p><i>theres only so much landlords can take. If you keep hounding them they will sell up and leave meaning less supply of good quality homes and higher rents</i></p>	comments, Propertymark	<p>that landlords have increased rents to cover their licence fee costs or that landlords have moved elsewhere.</p> <p>This is supported by the findings from the many other Councils in London and nationally that run discretionary property licensing schemes (selective and/or additional) and have no evidence to support that licensing has pushed landlords out of the rental market.</p> <p>If a landlord decides to increase the rent for their property, there are procedures which must be followed and any increase above market rents levels can be challenged by the tenant via the Residential Property Tribunal.</p>

Theme	Issue	Example comment	Source	Council response
Impact on low income families	Concern that an unintended consequence of licensing could be that low-income families will be priced out of Brent	<i>Renting in Brent can be expensive with a median rent in some Brent post codes for a three-bedroom property being £2,448 per calendar month (September 2024⁶). It is likely that many low waged and people in receipt of benefits access the PRS in Brent live in HMO property. We are concerned that landlords may increase rent due to the added and significant costs of licenses. Consequently, some renters living within the Borough will require cheaper accommodation due to being on a low income and the continued challenges in the cost-of-living crisis.</i>	Propertymark	As detailed previously, the licence fee is a relatively small proportion of the average monthly rental income in Brent (the licence equates to around £4.00 per week over the 5-year scheme), and therefore should not have an impact on rents charged in a competitive market. However, if landlords want to increase the rent, there are procedures which must be followed and any increase above market rents levels can be challenged via the Residential Property Tribunal.

4.4 'Good' landlords and collaboration

Theme	Issue	Example comment	Source	Council response
Target rogue landlords	Respondents suggested that the Council focus its efforts solely on targeting rogue landlords	<i>Prosecution of rogue landlords doesn't need to mean demonizing 95% of landlords</i>	Consultation survey comments	The Council understands that many landlords who rent out HMO properties in the private sector manage their properties responsibly. However, the evidence shows that the borough is experiencing large scale issues in HMOs with poor housing conditions and poor management.
		<i>If you have knowledge of the rogue landlords, hand them fines and stop them becoming landlords. Do not penalise the landlords doing a good job.</i>		The Council's intention is to use the regulatory framework provided by the additional HMO licensing scheme to focus on those that do not comply and impact negatively on the reputation of those responsible landlords as well as having a detrimental effect on tenants and neighbourhoods.
		<i>Good landlords are already doing the right and correct things for their properties and tenants. Resources should be focused on targeting rogue landlords and not penalising all landlords with this additional extortionate cost.</i>		Non-compliant landlords will be subject to more scrutiny and put to greater cost than responsible, compliant landlords as they will be given a reduced-term licence. Furthermore, we will use robust enforcement against wilfully non compliant landlords to ensure HMO properties are protected by the licensing scheme. We will continue to robustly enforce against wilfully non-compliant landlords

Theme	Issue	Example comment	Source	Council response
				and the licence fee will enable the Council to have a significant proactive enforcement capability.
Work with 'good' landlords	Respondents expressed concern that the scheme would treat 'good' landlords and rogue landlords the same, penalising good landlords	<i>Work with landlords more rather than taking an aggressive approach when contraventions occur</i>	Consultation survey comments, Propertymark	The Council is committed to providing robust support for landlords, and we have several measures already in place to ensure this.
		<i>Consider more workshops or training sessions for landlords to help them navigate regulations and improve property management skills.</i>		Our guidance for landlords, available on the Council's webpage, provides comprehensive information and advice to landlords to support them in meeting their obligations when letting a property.
		<i>Propertymark would prefer a regulatory framework, which seeks to educate landlords in improving their stock rather than punitive measures that are difficult to enforce and only punish compliant landlords letting those that require improvements to go undetected</i>		<p>We shall continue to provide landlord forums and educational opportunities to support landlords.</p> <p>The Council welcomes engagement with all agents' representatives and will strengthen our links with member organisation over the licensing scheme period.</p> <p>The Council has considered a range of alternatives to additional HMO licensing</p>

Theme	Issue	Example comment	Source	Council response
		<i>Propertymark has a network of Regional Executives and a series of Regional Conferences that take place throughout the year. We would be very happy to work with the Council to engage with local agents over a virtual roundtable discussion on how standards can be improved.</i>		but does not believe they are as effective in dealing with the poor housing conditions and management standards in HMOs in the borough. The Council is satisfied that the proposed additional HMO licensing scheme, in conjunction with other initiatives, will bring about the required improvements.
<div> <div>Work collaboratively with letting agents</div> <div>896342</div> </div>	Respondents suggest that the Council should work collaboratively with letting agents.	<i>Letting agents have a critical role to play in effective management of the private rented sector. We would encourage the Council to explore mechanisms for effective liaison with letting agents and to acknowledge the benefits of encouraging landlords to use regulated letting agents such as safeagent accredited firms.</i>	Safeagent	The Council agrees and is indeed open to exploring ways for effective collaboration with letting agents.

4.5 Anti-Social behaviour

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Theme	Issue	Example comment	Source	Council response
Landlords' responsibility for dealing with ASB and tenant behaviours	Respondents expressed concern about landlords being held accountable for ASB and other tenant-related behaviours along with concerns about the Council supporting landlords in addressing ASB	<i>More definition and accountability of TENANT responsibilities for the general upkeep and maintenance of the property. They should also bear some responsibility as per the terms defined in the tenancy agreement.</i>	Consultation survey comments, Propertymark	The Council understands that it is the responsibility of all residents in the borough not to partake in anti-social behaviour.
		<i>Landlords have a role here but tenants are responsible for maintaining gardens, putting out waste and recycling and their behaviour.</i>		The Council does not expect landlords to be solely responsible for the behaviour of their tenants, but the Council would expect landlords to meet the proposed licence conditions, which lay out how to help address issues with ASB in licensed HMOs.
		<i>Unfortunately, landlords are not the best equipped to deal with anti-social behaviour and certainly do not have the skills or capacity to deal with some tenants' problems such as mental health or drug and alcohol misuse.</i>		The Council will work with landlords who are experiencing issues with tenants to address issues of ASB, including guidance on how to manage ASB caused by tenants.
		<i>Issue i believe is that tenants should be responsible for some issues at the property, the landlord should not be liable for everything, also with number of tenants if overcrowded tenants</i>		The Council would encourage landlords to include clauses in their tenancy agreements about ASB, and to manage their tenancies and ensure that ASB caused by their tenants is effectively addressed and if necessary appropriate action taken.
				The licence conditions give actions which landlords should take to indicate that they are dealing with ASB associated with their properties. Evidence presented to the Council

		<p><i>should have to pay a penalty not landlord.</i></p> <p><i>The principle is great and we do need a baseline for standards for private rented accommodation but the onus here is on landlords and more costs and regulations will reduce the size of the sector and drive up rents.</i></p>		<p>may be used in claims for possession. The Council's (ASB) officers will work in partnership to support landlords in dealing with tenants causing ASB.</p>
<p>Environmental crime</p> <p>Page 344</p>	<p>Clarity over the extent to which the ASB and enviro-crime referred to in the Evidence Pack is attributable to the PRS</p>	<p><i>The evidence document has highlighted additional licensing as a tool to tackle environmental crimes such as fly tipping, poor waste, husbandry and street cleaning. Brent also says that there has been a reduction in repeated waste related incidences (such as fly tipping) linked to HMOs. We would be interested in further evidence to highlight this point. Essentially, while we welcome efforts to tackle fly tipping, unless the perpetrator is caught doing the fly tipping or there is some sort of evidence, such as an addressed letter, within the fly tip, then it is impossible to suggest to what extent fly tipping is a problem in the PRS. Even if the link between</i></p>	<p>Property mark</p>	<p>While it is not always possible to identify individual perpetrators of fly tipping, the licensing framework enables the Council to engage directly with landlords and managing agents to ensure that adequate waste storage facilities are provided, tenants are informed of their responsibilities, and waste management arrangements are clearly documented and monitored. This proactive approach contributes to a reduction in repeat waste-related incidents associated with licensed HMOs.</p> <p>We fully acknowledge that landlords cannot be held responsible for actions beyond their control. However, through licensing, they are well positioned to set clear expectations, maintain appropriate property standards, and work collaboratively with tenants to prevent environmental issues. The Council's objective is not to assign blame, but to promote shared</p>

		<i>fly tipping and the PRS could be proved, there is very little that landlords could do for any behaviour outside the tenancy unless the fly tip was done within the grounds of the property.</i>	<p>responsibility and improve the overall quality and cleanliness of neighbourhoods.</p> <p>All data within the Evidence Pack and the Housing Conditions Report (Appendix 1) relating to ASB is specifically linked to HMOs. Where no link could be found or maintained, this data was excluded. Section 6 (page 55) of the Housing Conditions Report states: <i>"It is important to note, where incidents could not be matched directly at the property level with HMO, ASB incidents have been discarded from this study. For example, ASB incidents investigated on a street corner that cannot be directly linked to an HMO property have been excluded."</i></p>
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4.6 Administration of the proposed scheme

Theme	Issue	Example comment	Source	Council response
Use existing regulations and powers	Respondents expressed they felt that the current regulations around the PRS and powers granted to the Council were sufficient to solve any issues and that any additional regulations add an unnecessary layer of bureaucracy.	<i>It's too bureaucratic and landlords are already selling up to the detriment of tenants who will have nowhere to live</i>	Consultation survey comments	<p>The Council acknowledges that landlords are subject to existing regulations and laws. However, the existing mandatory HMO regulations and powers do not require landlords of smaller HMOs to declare themselves to the Council. This means that without an additional HMO licensing scheme there is no obligation for landlords to make their properties known to the Council or to be proactive in improving conditions, including minor issues (that may still pose a health and safety risk) but still need to be addressed, but which a tenant may not complain to the Council about. Formal action under the Housing Act can be a slow process, and improvements to properties can take many months.</p> <p>Whilst the Council acknowledges that many HMO landlords operating in the borough keep their properties to a high standard, the evidence presented during the consultation shows that there are large scale issues with poor property conditions in HMOs in the borough.</p> <p>The Council have considered a range of alternatives to additional HMO licensing, but</p>
		<i>Additional unnecessary burden on landlords that are already squeezed for money.</i>		
		<i>Government legislation is already in place to cover most licensing conditions, local licensing just doubles bureaucracy.</i>		
		<i>Use existing legislation where necessary. The Council already has extensive powers to enforce property maintenance and anti-social behaviour and put the Council's resources into specifically targeting problems and property.</i>		

Theme	Issue	Example comment	Source	Council response
				do not believe they are as effective in dealing with poor property maintenance and management in the borough.
Importance of alternative/complementary measures	Respondents encouraged the Council to work in tandem with law enforcement, utilising alternative measures	<i>More investment in community police and policing...Stronger enforcement of existing guidelines</i>	Consultation survey comments	<p>As clearly outlined in the Evidence Pack, the Council maintains strong collaborative relationships with a range of external partners, including the police, to deliver a coordinated, multi-agency response to crime and antisocial behaviour. This joined-up approach ensures that the issues affecting our residents, businesses, and visitors are addressed effectively and consistently.</p> <p>The success of this model was demonstrated during the previous Additional HMO licensing scheme, where collaborative working significantly enhanced enforcement outcomes. In particular, the increase in prosecutions of non-compliant landlords can be directly linked to improved intelligence sharing and operational coordination across multiple disciplines. This integrated approach not only strengthens enforcement but also ensures that resources are used efficiently and that interventions are targeted where they are most needed.</p>
		<i>Police on the streets for ASB and Brent staff walking around the area investigating fly tipping</i>		
		<i>Criminal activity cannot just be passed to a third party (police). The Council must pursue issues and work with police until they are resolved.</i>		
Failure to find/license/penalise rogue landlords	Respondents expressed concerns that rogue landlords would	<i>There is too much pressure on good landlords, while bad landlords continue to operate</i>	Consultation survey comments	The Council recognises the significant challenges posed by landlords who operate HMOs without the required licence,

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Theme	Issue	Example comment	Source	Council response
	continue to operate under the radar, resulting in a scheme that only includes good landlords without achieving benefits for them	<p><i>outside of regulations - pursue the bad ones instead of using the good ones as cash cows.</i></p> <p><i>These licensing fees do not get paid by the real perpetrators of bad practice in the rental sector.</i></p> <p><i>The vast majority of landlords and managing agents in Brent operate professionally and within the law. Imposing blanket licensing unfairly penalizes compliant property owners with increased bureaucracy and significant costs, while rogue landlords often ignore such schemes entirely. This approach dilutes resources that could be more effectively used in targeted enforcement against the minority who flout regulations.</i></p>		<p>undermining the integrity and effectiveness of the licensing scheme. Tackling unlicensed properties is therefore a key priority.</p> <p>If a new scheme is approved, the Council will undertake proactive inspections to identify unlicensed HMOs and carry out regular compliance checks to ensure licence conditions are being met. We have set ambitious objectives for this scheme and are committed to deploying resources strategically - focusing enforcement efforts on the properties and landlords of greatest concern.</p> <p>By targeting those who fail to licence or who breach licence conditions, the Council aims to uphold a fair and consistent standard across the sector. This approach not only protects tenants but also supports compliant landlords and contributes to safer, better-managed housing for all residents in the borough.</p>
Efficient administration and robust enforcement	Respondents emphasised the need for proper and efficient administration and,	<i>What Brent needs is better enforcement of the existing framework, not new layers of regulation. The Council already has the powers to deal with</i>	Consultation survey comments, Safeagent	The Council agrees that efficient enforcement and proactive inspections are fundamental to the success of any scheme. Brent Council has one of the strongest

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Theme	Issue	Example comment	Source	Council response
	robust enforcement of the scheme	<i>poorly managed properties and unfit landlords but often lacks the capacity or will to enforce them effectively. Redirecting resources to enforcement rather than licensing administration would yield far better results.</i>		records in enforcement and administration of its licensing scheme.
		<i>More regular and mandatory visits and checks by Council to ensure living conditions are met.</i>		The financial model underpinning the scheme builds in enforcement and inspection officers ensuring that visits to HMO properties are routinely conducted, and appropriate enforcement action is taken where necessary.
		<i>Works are being done in these properties without building control approvals nor respect to neighbors. Also soundproofing should be considered in these properties as sound exponentially increases with more people around. Also max amount of people living in these places should be checked occasionally. Maintenance of dwelling and gardens should be regularly checked. This should also help with fly-tipping.</i>		While the Council remains committed to an educational and supportive approach - particularly for landlords who are willing to comply - we will not hesitate to take firm action where there is clear and wilful non-compliance. This dual approach ensures that risk within the private rented sector is managed effectively, and that tenants living in HMOs are afforded the protections the licensing scheme is designed to deliver.
Transparency and accountability in licensing outcomes	If the scheme is approved an annual review should be	<i>If the scheme is approved, the Council should consider providing an annual summary</i>	PropertyMark	We agree that transparency and accountability are essential to building trust and demonstrating the value of the scheme

Theme	Issue	Example comment	Source	Council response
	undertaken and made publicly available	<i>of outcomes to demonstrate to tenants, landlords and letting agents' behaviour improvements and the impact of licensing on the designated area over the scheme's lifetime. This would improve transparency overall.</i>		to all stakeholders, including landlords, letting agents, tenants, and the wider community. The Council is committed to monitoring the impact of the scheme and recognises the importance of sharing this information in a clear and accessible way.

4.7 General comments on the proposed scheme

Theme	Issue	Example comment	Source	Council response
Overall opposition to HMOs in the borough	Respondents expressed general dissatisfaction with the state of HMOs and perceived growth in the HMO tenure within the borough	<i>Brent should NOT take on any additional HMO we are saturated and out of control. Brent seriously have problems as we are</i>	Consultation survey comments	HMO planning and HMO licensing are separate regimes, and their legislative requirements are quite different. Small HMOs (between 3 and 6 unrelated occupiers) have permitted development rights. The Council has no legal grounds to take action or stop the development where change of use is 'permitted'.
		<i>Not just a license, but they need to be capped. The turning of whole areas into HMO's are creating urban ghetto's. I've visited HMO's in appalling conditions in our house searches, and in our 22yrs in the borough, the Council planning and licensing policies have created a ghetto. There are illegal extensions, illegal conversions, antisocial and unsafe behaviour, and properties in appalling conditions. HMO's create over crowding, not only in the property itself, but on numerous whole streets (I can send names if you wish).</i>		Property licensing schemes do not result in increased numbers of HMOs, but they do seek to improve the management and standards of the HMO properties already in existence. The Council believes, therefore, that those areas with large numbers of HMOs will continue to see the benefits of additional HMO licensing that a further scheme would bring.
		<i>Stronger limitations on the number of HMOs permitted in an area, in order to reduce anti-social behaviour, and in</i>		The licensing scheme will enable issues of overcrowding within HMOs to be addressed. There are specific licence conditions relating to the maximum occupancy of both the property and the rooms within it. Licence-holders are required to inspect their properties every three months. This must include evidence of checks that the HMO is

Theme	Issue	Example comment	Source	Council response
		<i>order to limit water use, household waste and strain on public services like GPs and public transport</i>		being occupied by the level of occupancy specified in the licence.
Issues in Council and housing association properties Page 352	Respondents expressed that they believed the primary issues within rented properties were primarily related to properties owned/managed by Councils and housing associations.	<i>Finally, the Council also needs to set higher standard for properties owned and managed by the Council. I have several times reported poorly maintained properties , only to find out they were owned/managed by Brent. Shocking.</i>	Consultation survey comments	The proposed additional HMO licensing scheme is set within the context of the Council's wider programmes to improve property standards and reduce ASB throughout the borough.
		<i>The issue is in the area is with Housing Associations who manage HMO's.</i>		The Council's "Moving Brent Forward Together for 2023-2027" borough plan is made up of five key ambitions, including "Prosperity and Stability in Brent", in which the Council sets out its goals of delivering 'safe, secure, decent housing'.
		<i>Focus on Housing Association owned and Council owned properties.</i>		The Council acknowledges there are challenges faced by all tenures of housing, including Council-run and housing association properties as well as owner-occupied properties. However, additional HMO licensing is a tool that enables the Council to mitigate issues <i>solely</i> within the PRS; specifically smaller HMOs. properties let by a local authority or a Registered Provider (housing association) are exempt from licensing by law and thus any

Theme	Issue	Example comment	Source	Council response
				issues with these types of properties must be dealt with separately.
Opposed to boroughwide scheme	licensing should be focused only on wards with the highest number of HMOs of concern	<i>In relation to the evidence base, the data indicates a large spike in HMOs subject to additional licensing in Wembley Park, but very low numbers in wards such as Alperton, Barnhill, Kenton, Kingsbury, Northwick Park, Preston, Queensbury, Sudbury, Tokyngton, Welsh Harp and Wembley Central.</i>	Safeagent, PropertyMark	The Council acknowledges concerns about the distribution of HMOs and the suggestion that licensing should focus only on wards with the highest concentrations. However, a borough-wide scheme ensures consistency, fairness, and the ability to intervene wherever poor management is identified. It also enables the Council to allocate resources flexibly and proportionately, targeting the landlords and properties of greatest concern while maintaining oversight across the borough.
		<i>Whilst the data includes some 'hidden HMOs', we could find no definition and no certainty what this was referring to</i>		This approach aligns with the statutory framework and supports the Council's strategic aim to raise standards across the entire private rented sector.
		<i>The data suggests a better use of limited resources could be to focus the licensing scheme on those wards with the highest number of HMOs that are cause for concern to achieve more targeted interventions.</i>		The term "hidden HMOs" in the evidence base refers to properties that are predicted to meet the legal definition of an HMO but have not been licensed under either mandatory or additional licensing powers. These are often identified through inspections, complaints, or intelligence sharing with partner agencies. Including them in the data is essential to
		<i>Essentially, using a borough-wide scheme is difficult to find</i>		

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Theme	Issue	Example comment	Source	Council response
		<i>the root cause of issues and the Brent should consider targeting their scheme</i>		<p>understanding the true scale of the sector and the risks posed by unregulated accommodation.</p> <p>While some wards may show fewer reported issues, this does not diminish the need for borough-wide intervention. Underreporting is common, particularly in newer developments or professionally managed blocks.</p> <p>The Council therefore considers the proposed designation to be both proportionate and justified.</p>
Inclusion of Wembley Park	Insufficient evidence to support the inclusion of Wembley Park within the scheme.	<i>The business case for including Wembley Park within a new additional licensing scheme looks particularly weak. Despite having the largest number of HMOs subject to additional licensing, the data shows extremely low levels of hazards, ASB incidents, tenant complaints and enforcement interventions. As the Council point it, the scheme can only be introduced if the Council is satisfied a significant proportion of the HMOs in that</i>	Safeagent, Propertymark	<p>Section 56 of the Housing Act 2004 allows a local housing authority to designate either the area of their district or an area in their district as subject to additional licensing if they consider that a significant proportion of the HMOs of that description in the area are being managed sufficiently ineffectively as to give rise, or to be likely to give rise to one or more particular problems either for those occupying the HMOs or for members of the public.</p> <p>Brent Council has proposed to designate the area of its district (the London borough of Brent). When considering the evidence for the</p>

Theme	Issue	Example comment	Source	Council response
		<p><i>ward are being poorly managed and are giving rise to problems affecting the occupiers or members of the public. With all the published data indicating this test is not met, there appears to be no sound basis for implementing the additional licensing scheme in this ward.</i></p> <p><i>it should also be considered that in some areas of Brent, there is a very high proportion of properties that are new builds where standards are high including in the Wembley Park area of the borough. We do not think it would be appropriate to have a scheme in areas where there has been a high proportion of new builds built as the standards are generally very high.</i></p>		<p>area as a whole (including Wembley Park) the Council is satisfied that the legal tests have been met and a significant proportion of the HMOs of that description in the whole borough area are being managed sufficiently ineffectively.</p> <p>The evidence base supporting the scheme has therefore been developed at the borough level, taking into account a wide range of indicators including housing conditions, management standards, and the prevalence of HMOs. While some wards may show lower levels of reported issues, this does not negate the overall borough-wide need for intervention. It is also recognised that underreporting can occur in areas with newer developments or professionally managed blocks, where tenants may be less likely to raise concerns directly.</p> <p>Including Wembley Park within the scheme ensures consistency in regulation and enables the Council to proactively engage with managing agents and freeholders to maintain high standards as the area continues to grow.</p> <p>The Council will continue to monitor the area closely and remains committed to reviewing</p>

Theme	Issue	Example comment	Source	Council response
				the scheme's impact over time. However, based on the borough-wide evidence and the need for a consistent and preventative approach, the inclusion of Wembley Park is considered both proportionate and justified.
Necessity for a further additional HMO Scheme Page 356	Concern that licensing schemes are not achieving aims and objectives	<i>It is disappointing that Brent Council must renew their previous additional licensing scheme for a further five years especially as they have been operating schemes since 2015. This clearly demonstrates that the aims and objections from the previous scheme were not met, and they should find a new way of improving standards.</i>		<p>The renewal of the scheme does not indicate failure, but rather reflects the ongoing and evolving nature of housing challenges in the borough.</p> <p>Since the introduction of additional licensing in 2015, Brent Council has licensed over 2,500 HMOs and carried out thousands of inspections, leading to significant improvements in property conditions, management standards, and tenant safety. The scheme has enabled the Council to identify and address serious hazards, enforce minimum standards, and support responsible landlords.</p> <p>Despite these achievements, the private rented sector in Brent continues to grow. This growth brings ongoing pressures, including poor property conditions, overcrowding and non-compliance with safety standards. Renewing the scheme allows the Council to build on the progress</p>

Theme	Issue	Example comment	Source	Council response
				made, maintain regulatory oversight, and continue improving conditions for tenants
The inclusion of section 257 HMOs (certain converted blocks of flats)	Difficulty in determining whether a property qualifies as a section 257 HMO	<p><i>The consultation explains the Council intend to include all section 257 HMOs within the proposed additional licensing scheme.</i></p> <p><i>We have concerns about including all such properties within the additional licensing scheme due to the difficulty experienced by letting agents in knowing when a property was converted and whether the conversion satisfies the relevant building standards. It is not something that is reasonable for a letting agent to assess.</i></p> <p><i>In situations where there is a freeholder and separate long leaseholders, the situation is further complicated by the need to determine whether less than two thirds of the flats are owner-occupied. Only the freeholder may possess this</i></p>	Safeagent	<p>The Council has considered the concerns raised regarding the inclusion of section 257 HMOs in the proposed additional licensing scheme. However, we maintain that their inclusion is necessary to address safety risks commonly found in such properties, particularly those with inadequate fire protection and poor conversion standards.</p> <p>We recognise that determining whether a property qualifies as a section 257 HMO may involve some complexity. However, it is reasonable to expect letting agents and landlords to undertake appropriate due diligence when managing properties. The Council will provide clear guidance and support to assist in identifying licensable properties.</p> <p>The presence of multiple leaseholders or changes in tenure over time does not negate the need for regulation, nor does it prevent the Council from enforcing licensing requirements where appropriate. Concerns about mortgage lending and property values are noted but unsubstantiated. Licensing can improve</p>

Theme	Issue	Example comment	Source	Council response
		<p><i>information and the tenure of each flat may vary over time.</i></p> <p><i>This would make it extremely difficult for a safeagent accredited firm to assess whether a licence is required, despite their best endeavours. For example, it may be that the building did not require a licence when a flat was rented out but subsequently requires licensing because another leaseholder in the building has rented out their flat. As such, a letting agent could find themselves committing an offence of managing a flat in a licensable building without a licence, simply because another flat had been rented out without their knowledge. This also has implications for the long leasehold landlord regarding a potential Rent Repayment Order application.</i></p> <p><i>Bringing section 257 HMOs within the additional licensing scheme could also be</i></p>		<p>housing quality and market confidence. The Council has conducted a thorough consultation, engaging a wide range of stakeholders, and is satisfied that statutory requirements have been met.</p> <p>Licensing of only certain section 257 HMOs would create enforcement gaps and undermine the scheme's effectiveness. The inclusion of all section 257 HMOs within the additional licensing scheme will ensure consistency, fairness, and the ability to address poor housing conditions across the borough.</p>

Theme	Issue	Example comment	Source	Council response
		<p><i>problematic for long-leasehold owner-occupiers who find their flat is within a licensable building. The licensing fee may push up their service charge and could cause difficulties with their mortgage lender. As the licence would need to be disclosed to a prospective purchaser, some mortgage lenders may be reluctant to 3 lend on a residential mortgage for a flat within a licensed HMO, thus adversely impacting the property's value.</i></p> <p><i>It is also the case that the 2024 general approval to introduce an additional licensing scheme only applies if the Council has consulted persons likely to be affected by the scheme designation. Without actively consulting long leaseholder owner occupiers and explaining the implications of licensing section 257 HMOs, the conditions in the general approval would not be met and the additional licensing scheme</i></p>		

Theme	Issue	Example comment	Source	Council response
		<p><i>could not be introduced without Secretary of State approval.</i></p> <p><i>Whilst we are opposed to the idea of including all section 257 HMOs within the additional licensing scheme, we recognise there are circumstances where a particular type of section 257 HMO may be worthy of more intensive regulation. For example, where a landlord has converted a property into cramped and poorly designed studio flats entirely for private rental without any planning or building regulation approval.</i></p> <p><i>In such circumstances, the additional licensing scheme could be restricted to section 257 HMOs where the whole building and all the individual flats within it are in single ownership or considered to be effectively under the same control. In response to our</i></p>		

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Theme	Issue	Example comment	Source	Council response
		<p><i>feedback, several Councils have adopted this approach.</i></p> <p><i>Other Councils such as Westminster City Council, Newham Council and the Royal Borough of Kensington and Chelsea have listened to our feedback and excluded all section 257 HMOs from their additional licensing schemes.</i></p> <p><i>We would encourage Brent Council to give this further thought and either narrow the section 257 HMO licensing criteria or remove them entirely from the scheme.</i></p>		
Short-term lets	Respondents expressed desire for the inclusion of short-term lets/Airbnb properties within the scheme	<i>Ensure short-term and holiday lettings are licensed as they are very similar to HMO and are used all year round creating lots of rubbish and noise</i>	Consultation survey comments	Properties let through Airbnb are short-term lets and do not legally fall within the HMO licensing scheme which applies to longer term rentals. However, Airbnb properties may require planning permission for a change of use if the property is rented out frequently. Generally, they require planning permission if let for over 90 nights per year:
		<i>Holiday letting limits being exceeded. these are HMO-like rentals that are not monitored nor enforcement action taken</i>		

Theme	Issue	Example comment	Source	Council response
		<p><i>when being used all year round.</i></p> <p><i>Timing - should wait until the new renters bill has passed to identify any overlaps between local licensing rules and national registration requirements</i></p>		The Council will continue to monitor short-term lets and respond to issues caused by Airbnb's, such as noise complaints using appropriate legislation.
EPC ratings Page 362	Only a small number of EPC properties below E rating	<p><i>According to the consultation document 'the licensing inspection regime will also enable us to identify tenants on low incomes who are living in homes with an E, F or G EPC rating and those who may be affected by fuel poverty. Tenants will be referred to the appropriate services to ensure they receive the available support, and landlords will be advised accordingly.' However, only a very small number of properties would be below EPC E, and these may be exempt. We would be grateful for further clarity for landlords in this regard.</i></p>	Propertymark	<p>The requirement for HMO properties to meet a minimum band E EPC rating remains relevant and is integral to the Council's efforts to improve housing quality and environmental sustainability.</p> <p>By encouraging landlords to achieve higher EPC ratings, the Council aims to improve the energy efficiency and overall condition of properties. This not only benefits the environment but also ensures better living conditions for tenants.</p>

Theme	Issue	Example comment	Source	Council response
Support for landlords dealing with tenant-related issues	A need for guidelines and support for landlords on how to handle tenant-related problem	<i>Propertymark would like clarification on Brent Council's policy concerning helping a landlord when a section 21 notice is served, the property is overcrowded, or the tenant is causing antisocial behaviour, as per the Council's consultation. What steps will the Council take to support the landlord? It would be useful if the Council were to put a guidance document before introducing the scheme to outline its position regarding helping landlords remove tenants who are manifesting antisocial behaviour. The recent proposed changes to section 21 legislation and how tenancies if implemented could mean landlords will become more risk averse to taking tenants with a perfect reference and history. We would be willing to work with the Council and develop a dispute resolution service with other local authorities.</i>	Propertymark	The Council will work in partnership to support landlords in dealing with tenants causing overcrowding or persistent ASB. Licensing Officers will work closely with the Homelessness Prevention team to support landlords and tenants to sustain tenancies. However, where the sustainment of tenancies is not possible landlords are advised to seek legal advice before taking steps to seek possession of their property.

Theme	Issue	Example comment	Source	Council response
Improving access to the PRS	Request for Council to maintain a database of adaptable property to sign post older and disabled people into suitable prs housing	<i>We understand that an increasing proportion of older and disabled people access the PRS in Brent. Propertymark have called for local authorities to keep a database of adaptable property to sign post older and disabled people into suitable prs housing when there is not appropriate social housing or housing is not near support networks. Given the wealth of data the Council must have from previous Licensing schemes, we would be interested to know if any consideration of such a database has been given. We would also welcome further conversations with Brent on improving access particularly for vulnerable groups.</i>	Propertymark	<p>We recognise the increasing reliance on the PRS among vulnerable groups and share your commitment to ensuring that housing is both suitable and accessible. The Council's Disabled Facilities Grant and Housing Adaptations teams are embedded within our Private Housing Service and play a key role in supporting residents with specific needs. Their work is guided by our Private Sector Housing Strategy, which outlines our approach to improving housing standards and accessibility across the borough.</p> <p>Through our licensing schemes, we have gathered substantial data on PRS properties, including those that have received grant funding for adaptations. While we do not currently maintain a formal database of adaptable properties for signposting purposes, we acknowledge the value of such a resource and will consider its feasibility as part of our ongoing strategy development.</p> <p>In addition, our Temporary Accommodation teams assess the suitability of placements on a case-by-case basis, ensuring that accommodation meets the specific needs of individuals, including proximity to support networks and accessibility requirements.</p>

Theme	Issue	Example comment	Source	Council response
				We welcome your offer to engage in further discussions and would be pleased to explore collaborative opportunities with Propertymark and other stakeholders to improve access to appropriate PRS housing for vulnerable groups.
Renters Rights Bill	Respondents expressed their view that the proposed scheme would duplicate the policies proposed within the Renters Rights Bill	<p><i>Considering the renters bill is going through parliament at the moment I think that a lot of back-tracking can be avoided by waiting with this plan until the provisions in the renters bill are clear and can be implemented at the same time without overlap and duplication.</i></p> <p><i>Also, the Renters Rights Bill will introduce a PRS register which will require submission of many safety documents - this will likely duplicate a lot of the documents required for licensing and therefore increase the burden on landlords which ultimately means smaller landlords existing and those that remain need to increase rents to cover the cost of</i></p>	Safeagent, Propertymark	<p>The Council has carefully considered the proposals in the Renters Rights Bill. While the proposal includes valuable tools for local authorities, like the property portal, it is not a substitute for an additional HMO licensing scheme.</p> <p>However, additional HMO licensing provides a locally tailored, systematic approach to improving housing standards. It is more than just a collection of information; it is a proactive means for local authorities to inspect privately rented housing without the need for tenant complaints. This facilitates targeted action where it is needed most, ensures property managers are fit and proper persons, and protects vulnerable tenants.</p> <p>The property portal proposed in the Renters Rights Bill will aid in the identification of unlicensed properties and inform landlords about local activities. However, it will not</p>

Theme	Issue	Example comment	Source	Council response
		<i>increasing administrative requirements.</i>		directly improve property conditions and management. Certificates will still need to be checked for accuracy, and landlords can opt out of receiving notifications from the portal, limiting its impact.
		<i>We think that the proposed scheme on a local authority level would be duplicitous with the provisions of a national landlord's registration scheme being proposed in the Renters' Rights Bill as outlined in the King's Speech 2024 and will soon be at Committee Stage in the House of Lords</i>		In conclusion, while the portal and other parts of the Renters Rights Bill will provide a valuable source of information on the sector, an additional HMO licensing scheme is still necessary. It will ensure effective regulation and improvement of the HMO sector, providing a comprehensive solution that addresses the unique challenges of each targeted local authority area. The Council supports the implementation of both tools in tandem to achieve the best outcomes for landlords, tenants, and local communities.

Improving the Private Rented Sector in Brent

Additional HMO licensing proposal

Evidence for consultation 2025



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Glossary

Term	Meaning
Private rented sector (PRS)	The portion of housing in the borough that is rented from private landlords.
Privately rented	Homes rented from a private landlord.
Socially rented	Homes rented from the council or a Housing Association.
Mandatory houses in multiple occupation (HMO) licensing	A national scheme which requires landlords to have a licence to legally let eligible HMOs occupied by five or more unrelated persons living in two or more separate households sharing one or more basic amenity
Additional houses in multiple occupation (HMO) licensing	A discretionary licensing scheme which requires landlords to have a licence to legally let eligible HMOs occupied by three or four unrelated persons living in two or more separate households sharing one or more basic amenity, which fall outside the scope of mandatory HMO licensing
Selective licensing	A discretionary licensing scheme which requires landlords to have a licence to legally let their property to a family or no more than two unrelated sharers.
Designation	A geographical area chosen for licensing that meets relevant legal tests
Housing Health and Safety Rating System (HHSRS)	A Government prescribed system that rates housing hazards based on their risk to occupiers' health, safety, and welfare
Category 1 hazard (Category 1)	The most serious hazards under the HHSRS, which include immediate risk to a person's health, safety and welfare
Category 2 hazard (Category 2)	Less serious hazards under the HHSRS. Whilst considered less serious they can still be regarded as placing the occupiers' health, safety and welfare at risk.
Statutory notice	A legal document issued by the council that requires the recipient to complete specified actions within a specified timeframe.

Term	Meaning
Antisocial behaviour (ASB)	Behaviour related to the occupiers of, and/or visitors to, a rented property that causes nuisance, annoyance and irritation to neighbours and the community. Most commonly noise, litter and waste
Deprivation	Living on low income and not having the money to pay for some basic requirements.
Indices of multiple deprivation	A dataset produced by the government to give a relative value to how deprived an area is, compared to the rest of the country.
Barriers to housing and services	One of the Government's measures of deprivation. It combines measures relating to housing affordability, overcrowding and homelessness.
Minimum Energy Efficiency Standard (MEES)	Regulations that set a minimum energy efficiency standard (EPC rating of E) that applies to privately rented properties.
Energy Performance Certificate (EPC)	EPCs rate how energy efficient properties are using grades from A to G (with 'A' the most efficient grade).
Accreditation	Schemes overseen by various organisations, including local authorities and landlord associations, to provide training and encourage good practice by private landlords.
Habitable room	For the purpose of Brent HMO licence fees, a habitable room is any room or portion thereof used or designed for living or sleeping. This includes bedrooms, dining rooms, communal living rooms, dormitories, lounges, and studies. Conservatories, bathrooms, kitchens, hallways, and landings are not considered habitable rooms.

1 Executive Summary

Brent is consistent with the rest of London in that it has a shortage of affordable housing, with house prices remaining out of reach for many. The demand for social housing far outstrips the supply. As a result, privately rented accommodation is increasingly becoming the only viable housing option for many Brent residents, especially for families with children priced out of owner occupation, and those who are vulnerable and on low incomes. Currently, 36% of Brent's housing stock is in the PRS and this is expected to continue to rise in the future¹.

Brent is committed to addressing problems associated with houses of multiple occupation (HMOs) and property licensing is a way of driving up standards and ensuring safer and better managed HMO accommodation. Like all councils across the country, Brent operates a national mandatory HMO licensing scheme for larger HMOs. On 1 February 2020, we introduced a boroughwide additional HMO licensing scheme to ensure safety standards for tenants living in smaller houses in multiple occupation (HMOs) that are occupied by three or four people. This scheme ended on 31 January 2025.

While we have seen significant improvements, we believe that a further additional HMO licensing scheme is necessary to maintain and improve the management of HMOs in the borough. HMOs pose a higher risk to occupants, especially when poorly managed. The previous additional HMO licensing scheme has helped us improve standards and management practices of many HMOs across the borough. However, the evidence shows that there is a significant number of properties that are still substandard and potentially dangerous. Even landlords with good intentions may not always be aware of the latest legal and safety requirements. These HMOs pose a risk to the health, safety, and wellbeing of tenants, cause problems for neighbours, and demand substantial intervention from council enforcement services. It is important that the council uses all available tools to improve conditions for tenants in this sector. Licensing is one of the tools and plays a key role in this effort.

We are therefore consulting on proposals to introduce a further boroughwide additional HMO licensing scheme for all HMOs (excluding those licensed through the mandatory HMO licensing scheme) that if approved, would come into force in Autumn 2025.

Whether you are a private tenant, landlord, managing or letting agent, resident or

¹ Census 2021

business in Brent or a surrounding area, we want to hear your views on the councils' proposal for HMO property licensing in Brent.

2 Introduction

This consultation document provides information about the scale of problems relating to poor housing conditions, ASB and poor property management in Brent's HMO sector and the evidence to support the council's proposal to introduce a further additional HMO licensing scheme. It also provides a detailed description of the proposed licensing scheme, licence conditions, fees, and scheme objectives.

We want to know your views on our proposals before any final decision is made about the future of additional HMO licensing in Brent. We are keen to hear from all those who are likely to be affected by the proposals, including private tenants, landlords, managing agents and members of the community who live, operate businesses or provide services in the borough and/or the surrounding areas.

We would encourage you to complete our online survey [here](#).

We shall also be holding a number of forums during the consultation period. If you are interested in sharing your experiences and views, please email Prslicensing@brent.gov.uk

The consultation will run for 13 weeks from **10 March 2025 until 10 June 2025**.

For further information about the proposed additional HMO licensing scheme, assistance with completing the questionnaire or to request a paper copy of the consultation please contact:

- **Email:** Prslicensing@brent.gov.uk
- **Telephone:** 020 8937 2384/5
- **Post:** Tony Jemmott, Private Housing Services, 6th Floor, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ

Once the consultation has closed the council will review the feedback and responses. A full consultation report, including the council's response to any alternatives suggested, will be published on the council's website.

3 Property licensing schemes

3.1 What is property licensing?

Property licensing allows the council to regulate private rented properties in their area by issuing a licence to the person responsible for the property, usually the landlord. The aim of such schemes is to improve the private rented market by ensuring that the licence holder is a 'fit and proper' person to hold the licence, and that the property is of a decent standard for a landlord to rent out.

Licences come with conditions that relate to the management, use, occupation, condition and contents of the property. Some of these conditions are mandated by Government, however the council has scope to add its own conditions that are tailored to dealing with specific problems in the designation relating to the PRS.

The Housing Act 2004 sets out three types of property licensing schemes and prescribes how the council can implement them.

3.2 Mandatory HMO licensing

The Housing Act 2004 introduced mandatory licensing for certain privately rented HMOs. Generally, these are larger HMO properties occupied by five or more persons living in two or more households, and where those persons share facilities, such as kitchens/bathrooms/WCs. All local authorities in England must operate a mandatory HMO licensing scheme.

For the purpose of this consultation, mandatory HMO licensing is not being considered.

3.3 Additional HMO licensing (discretionary)

The Housing Act 2004 allows local authorities to designate either the entire area of the borough, or areas within the borough as being subject to an additional licensing scheme, in relation to some or all of the HMOs in that area, which are not already subject to mandatory HMO licensing, for a period of up to five years. Generally, these are smaller HMO properties occupied by three or four persons living in two or more households, and where those persons share facilities, such as kitchens/bathrooms/WCs. Additional HMO licensing can be introduced where the evidence demonstrates that a significant proportion of the borough's HMOs are being poorly managed and are giving rise, or are likely to give rise, to problems

affecting their occupiers or members of the public.

Additional licensing can also include properties converted into flats known as Section 257 HMOs. These are buildings which have been converted into and consist entirely of self-contained flats where less than two thirds of the flats are owner-occupied, and the conversion into flats did not comply with the appropriate building regulations.

A proposed additional HMO licensing scheme is the basis of this consultation, and the council welcomes feedback on this proposal.

3.4 Selective licensing (discretionary)

A selective licensing scheme for all other privately rented properties and not just HMOs can be implemented in selected or 'designated' areas of the borough. A selective licensing designation can only be made if the designated area has a high proportion of properties in the PRS and is experiencing one or more of the following criteria:

- low housing demand
- a significant and persistent problem caused by antisocial behaviour (ASB)
- high levels of crime
- poor housing conditions
- high levels of migration or deprivation.

For the purpose of this consultation, selective licensing is not being considered.

4 What are the benefits of HMO licensing schemes?

HMO licensing schemes offers benefits to landlords, tenants, the wider community and the council. These include the following:

Benefits to tenants

- licensing requires licence holders to proactively manage and maintain their HMOs to a decent standard through conditions that accompany a licence
- licensing allows the council to take a more proactive approach to improve the standard and safety of HMO properties for the tenants and families who live in them
- licensing encourages good practices by imposing specific obligations on the property licence that require a landlord to demonstrate that their properties are safe, such as providing fire, gas and electrical safety certificates. Many people who are vulnerable, disabled and living on low incomes rely on private renting. Licensing helps the council to protect as many tenants living in private renting as possible
- through increased communication about licensing, tenants become more aware of their rights and responsibilities, and they also gain a better understanding of and easier access to council services that can support them.

Benefits to landlords

- licensing requires landlords to proactively manage their properties and to take reasonable action to address problems. This ensures higher-quality, safer homes for tenants, which leads to fewer disputes and longer, more sustainable tenancies
- the council will work with landlords to help support them and build their professionalism, especially relating to fire safety
- licensing enables the council to create a 'level playing field' for responsible landlords by taking a much more robust approach to the minority of 'rogue' landlords who neglect their properties and fail to comply with regulation and standards
- licensing provides clear and consistent property management standards for HMOs.

Benefits to the community

- poorly managed privately rented HMOs have a negative impact on neighbourhoods. Licensing will increase the number of landlords managing their properties effectively, including the enforcement of tenancy conditions to combat neighbourhood nuisance caused by their tenants or people visiting their properties
- licensing will reduce ASB by requiring landlords to investigate and address complaints of ASB problems in their properties by imposing a requirement on the licence conditions
- there is a connection between HMOs and poor waste management. All property licences contain a condition that the holder must provide adequately sized bins and sufficient recycling containers for the occupiers.
- when an HMO is overcrowded, this is often linked to an increase in noise complaints. Through licensing the council is able to limit the number of occupants in an HMO, reducing overcrowding and the likelihood of noise nuisance
- licensing increases the council's ability to uncover empty properties and encourage their use back into the housing market.

Benefits to the council

- licensing enables the council to target support and information for both tenants and landlords more effectively
- licensing provides opportunity for easier engagement with landlords, managing agents, lettings agents, and others involved in the sector
- licensing improves data quality, enabling an intelligence-led approach to enforcement
- licensing increases the council's ability to uncover previously unknown HMOs, some of which will fall under mandatory licensing.

5 Planning legislation in relation to HMOs

Certain properties require planning permission to be converted into an HMO. Planning permission defines HMOs as “use classes”. You can perform certain types of work without needing to apply for planning permission. These are called “permitted development rights”.

A local planning authority can issue an ‘Article 4 Direction’. This removes the permitted development rights which allow a change of use from a dwelling house (Class C3) to use as an HMO (Class C4). In November 2022, Brent Council introduced an [Article 4 Direction](#) aimed at controlling the spread of HMOs across the borough. This action has removed permitted development rights boroughwide for the change of use of a building from a dwelling house to an HMO. As a result, a house or flat cannot be lawfully converted into an HMO without first going through the formal planning process and getting planning permission.

The introduction of an Article 4 Direction does not mean that all planning applications for a change of use from a dwelling house to a Use Class C4 HMO will be refused. The Direction requires the submission of a planning application for consideration by the local planning authority. Each application will be determined on its own merits but allows the council to consider the impact of any HMO on the neighbourhood before deciding whether to grant permission. For example, the impact of increased noise and rubbish, the loss of parking spaces, and the loss of family-sized homes.

If I am granted an additional HMO licence, do I still need to obtain planning permission?

You should have the appropriate planning permission and building control approval before you convert the property into an HMO.

The issuing of an HMO licence does not mean the property has the appropriate planning and building permission for this use. It will not have any bearing on the matter should planning or building control consider it necessary to pursue any formal action. The onus is on the applicant to fully consider and address all relevant planning and building control permissions.

6 HMO licensing schemes in Brent

In addition to the national mandatory HMO licensing scheme, on 1 February 2020 Brent implemented a boroughwide additional HMO licensing scheme to improve property and safety standards for tenants living in smaller HMOs.

The additional HMO licensing scheme applies to most HMOs that are not subject to the national mandatory HMO licensing.

- the current HMO licensing scheme has enabled council officers to inspect all HMOs to ensure they meet the minimum property and fire safety standards
- the licensing scheme has helped provide clarity on the required property and management standards for landlords, enabling them to operate legally
- licensing has allowed the council to enforce standards against non-compliant landlords and against those landlords who evade licensing. We have found that landlords who failed to licence also required wider enforcement interventions
- licensing has helped the council to raise awareness of tenants' rights and responsibilities and reach out and give advice to the more vulnerable residents living in HMOs so they can report any concerns that they have regarding their accommodation
- licensing has enabled us to improve communication with landlords to provide advice and information by carrying out HMO compliance inspections, providing fire safety advice and guidance, landlord forums, and dedicated landlord webpages on the council's website.

Since the introduction of the additional licensing scheme, more than 5000 HMO licences have been granted.

Licence type	Current licences granted
Mandatory	2676
Additional	2526
TOTAL	5,202

6.1 Improvements in poor housing conditions through regulation and enforcement

Through the HMO licensing schemes, the council has been able to improve standards, often in the most dangerous housing at the lower end of the housing market, where some of the most vulnerable people in society live. All licences have conditions attached which must be complied with, allowing the council to regulate the PRS, improve housing conditions, and promote better housing management standards.

Brent Council uses a range of interventions to improve standards in the HMO tenure, including regulation and enforcement. This includes using the Housing Act 2004, the Housing and Planning Act 2016, and other public protection legislation to serve statutory notices, impose civil penalties and, in the most serious cases, to take prosecution action and/or issue banning orders. Interventions can be a result of a complaint being made by a tenant about their accommodation or as a result of a proactive inspection by the council.

HHSRS inspections are essential to the councils strategy to improve property conditions. These inspections not only detect hazards but also provide the council with various enforcement options. Following a formal HHSRS inspection, if a local authority identifies a category 1 hazard, they are required to serve a statutory notice compelling landlords to improve property conditions.

A further option open to local authorities in combatting potentially hazardous property conditions and poor management is the issuing of civil penalties. The aim of the civil penalty regime is to improve property conditions and disrupt the business model of the small criminal element in the PRS, without unduly affecting the vast majority of law-abiding responsible landlords.

According to a recent NRLA (National Residential Landlords Association) report on local authority enforcement between 2021 and 2023, Brent was ranked among the top ten local authorities nationally in terms of enforcement action². The council conducts a significant number of HHSRS inspections and issues improvement notices and civil penalties more frequently than many other local authorities.

² [The Enforcement Lottery: Local authority enforcement 2021-2023](#)

Category	Rank out of top 10 local authorities	Details
Top ten local authorities who performed the most inspections in two years	4th	3,093 inspections
Top ten local authorities for issuing improvement notices	3rd	395 improvement notices
Top ten local authorities for issuing HMO related civil penalty	3rd	65 penalty notices

National Local Authority Enforcement (NRLA 2024)

Banning orders are applied to the most serious offenders and in August 2023 the council issued its first banning order against an HMO landlord for multiple housing related offences. The order bans the landlord from letting out houses in England and engaging in any sort of property management work in the country for the next five years. Further details can be found in Case study 1 below.

Case study one

Banning order imposed for repeated HMO management failures

Background

In April 2021, the Private Sector Housing team received a complaint from tenants of a licensed HMO, raising concerns about the safety and management of the property. On inspection significant breaches of HMO Management Regulations were identified, posing serious risks to tenant safety and wellbeing. These included blocked means of escape, expired safety certificates, inadequate fire safety measures, disrepair in communal areas, and the absence of tenancy agreements.



Council findings and action

Further investigation revealed that the managing agent had a history of poor HMO management dating back to 2017, when he had been prosecuted for similar offences. In January 2022, the managing agent was convicted under the HMO Management Regulations for poor property management and fined £33,347.50. Additionally, in August 2022, he was fined £6,190 for providing false and misleading information to the council. Due to ongoing concerns regarding the agents management practices, the council initiated banning order proceedings to prevent him from managing any HMO properties in the future, to protect the safety and welfare of tenants.

Outcome

In June 2023, the Residential Property Tribunal imposed a five-year Banning Order, prohibiting the agent from acting as a landlord, managing, or letting HMO properties for five years. This decision reflected the serious nature of the breaches, his repeated non-compliance, and his history of mismanagement.

Where appropriate, the council will not hesitate in using robust enforcement measures to hold landlords accountable, improve poor housing conditions and protect the safety and wellbeing of tenants.

The council's commitment to enforcement and regulation has resulted in much needed improvements and has helped raise standards of poor-quality accommodation in HMOs in the borough.

6.2 Reduction in antisocial behaviour

Poorly managed privately rented properties have a negative impact on many neighbourhoods. In particular, high levels of noise complaints and accumulations of rubbish can be linked to the failure of private landlords to manage their properties and tenancies effectively.

Poor waste management and fly tipping are linked to the PRS, particularly within HMOs. All HMO licences contain a condition that the licence holder must provide adequately sized bins and sufficient recycling containers for the occupiers. They must also display a notice for the occupiers of the property indicating the day of the week rubbish and recycling is collected. Through partnership working and sharing of intelligence, we continue to educate both landlords and tenants on their responsibilities in terms of waste disposal.

When a property is overcrowded, this is often linked to an increase in noise complaints. Through licensing, we have been able to limit the number of occupants in a property, reducing overcrowding and the likelihood of noise nuisance.

We have seen, through licensing, an increase in landlords managing their properties more effectively in order to ensure they do not breach licence conditions. This includes the enforcement of tenancy rules to prevent ASB by tenants or their visitors.

6.3 Partnership/joint working

Brent Council continues to work collaboratively with external partners, including the Police, Home Office, London Fire Brigade and Department for Work and Pensions, Justice for Tenants, NRLA, London Property Licensing, Brent Advice4Renters, HJA Solicitors, to create a safer and better community for its residents. Collaboration includes information sharing, joint investigations, and coordinated enforcement actions to address fraudulent activities effectively.

In addition, licensing has seen better and more effective working with internal stakeholders too, such as community safety, planning enforcement, The Brent Joint

Action Group (BJAG), Brents Enforcement Practitioners Group (EPG), empty properties team, housing needs, council tax, Brent Connects and others.

Since the introduction of the licensing schemes, co-working has resulted in an increase in prosecutions of rogue landlords which can largely be attributed to the increased and efficient intelligence sharing across multiple disciplines.

Case study two

Working in partnership to uncover an unlicensed HMO

In June 2023, Housing Enforcement Officers along with the Metropolitan Police carried out a dawn raid on a house in Wembley after being tipped off about the number of occupants by local residents. On inspection, 11 people were found living crammed inside the run-down house, with tenants sleeping in every room inside the house, except for the kitchen and bathroom.

The three-bedroom, semi-detached property was not a licensed house in multiple occupation and no licence application had been submitted.

On inspection, the property was found to contain a number of category 1 hazards including:

- a polystyrene ceiling giving way inside the kitchen
- no fire safety doors
- no fire alarm system
- extensive damp and black mould covering the walls and ceilings making it difficult for tenants to breathe.

Outcome

The council served a Housing Act 2004 improvement notice on the owners of the property. This required specified remedial works to be carried out to address the poor condition of the property. At the same time a licence application was pursued from the landlord, who was found culpable of operating without a licence. Further investigations led to the landlord being issued with a financial penalty of £10,000.

Additional HMO licensing provides the council with the necessary regulatory oversight to ensure the safety and wellbeing of HMO occupants. Licensing not only mandates landlords to adhere to stringent safety standards but it also empowers the council to take swift action against non-compliance leading to improved living conditions in HMOs.

We shall continue to work with multidisciplinary teams alongside internal and external stakeholders including the Police to identify properties of concern in order to improve property conditions and management standards.



6.4 Working with and supporting good landlords and agents

We recognise that the majority of landlords in the borough are both responsible and cooperative. We have taken a more educational approach seeking to work with landlords and bring about compliance through informal means.

We have particularly encouraged landlords to become accredited to increase their professionalism in managing their properties. Through accreditation, landlords are able to achieve a level of knowledge and competence before letting a home, which is key to raising standards in the HMO tenure.

As of January 2025, Brent had 2,238 landlords accredited to the London Landlords Accreditation Scheme (LLAS), the sixth highest of all London boroughs. LLAS-accredited landlords are eligible to receive a £40.00 discount on HMO licence fees.

Detailed guidance for landlords on their legal obligations and responsibilities has been produced and made available online.

Through the licensing schemes, a database of circa 12,000 landlords and agents operating in Brent has been compiled, supporting better communication and engagement with the sector.

6.5 Supporting private rented sector tenants

In promoting tenants' rights and responsibilities, tenants' awareness of the minimum standards to be expected in rented accommodation can dramatically be increased. Tenants have been encouraged to report landlords who have not licensed their properties or who do not comply with licensing conditions.

We also work in partnership with Brent Advice for Renters group, Hodge Jones Allen Solicitors, Setting the Standard 2, and the Brent homelessness preventions team to support tenants and help sustain tenancies.

It is clear from running the licensing schemes that licensing allows the council to work proactively with landlords and tenants. Licensing provides clear conditions for landlords to comply with, promotes an improvement in property conditions and enables ASB to be minimised through better, more effective management. Licence conditions can be enforced against much more effectively and quickly than using

other powers available to the council, such as Part 1 of the Housing Act (2004). Formal action under Part 1 is generally a slow process, with appeals allowed for most types of notices, which can significantly delay the time period for compliance.

7 Proposals for an Additional HMO licensing scheme

7.1 Criteria that must be considered before designating an additional HMO licensing scheme

To introduce an additional HMO licensing scheme the council must be satisfied that:

- a **significant proportion of the HMOs are being poorly managed** and are giving rise, or likely to give rise, to problems affecting the occupiers or members of the public
- a decision to implement an additional HMO licensing scheme must be consistent with the council's **housing strategy**
- it is part of a **coordinated approach** for dealing with homelessness, empty homes and other related policies
- there are **no other courses of action** that might provide an effective remedy and that introduction of a licensing scheme will significantly assist in dealing with the problem.

7.2 What is the council proposing?

The evidence base demonstrates that the criteria for a boroughwide additional licensing scheme is met in that a significant proportion of the borough's HMOs are being poorly managed and are giving rise, or are likely to give rise, to problems affecting their occupiers or members of the public. The HMO sector in Brent is affected by poor housing conditions and incidences of repeat ASB, which are worsened by other issues such as overcrowding and poverty.

The council has been evidence-led in proposing a further boroughwide additional HMO licensing scheme. Thorough evidence gathering and research has been carefully carried out to ensure that the most severe problems in each ward can be dealt with.

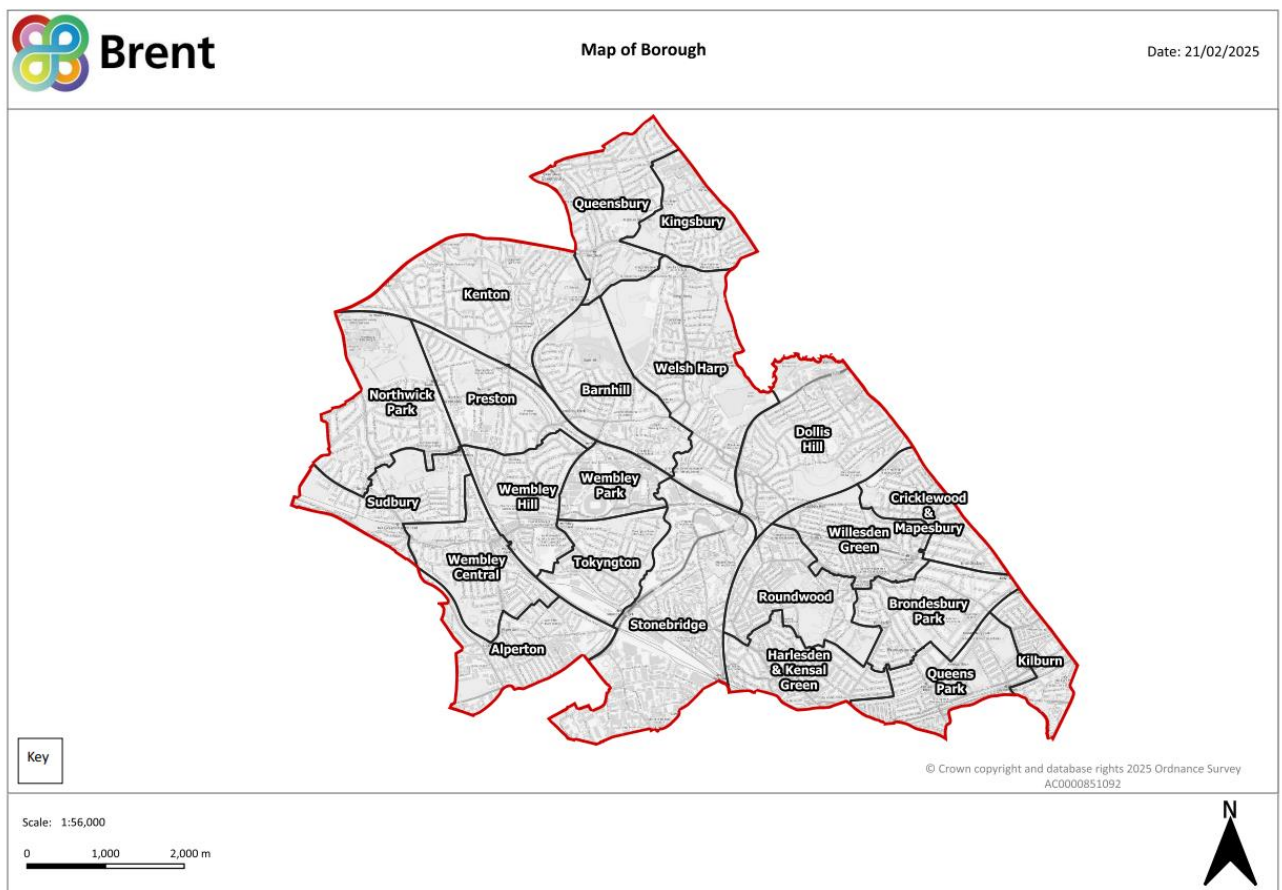
We are therefore proposing to introduce an additional HMO licensing scheme that will apply to all 22 wards in the borough. Subject to consultation and approval, the scheme will come into force in Autumn 2025 and last for five years.

- 1) An additional HMO licence will be required for properties that are rented to three or four occupiers in two or more households that share (or lack) toilet, washing and cooking facilities
- 2) An additional licence will apply to HMOs that do not fall within the remit of the mandatory HMO licensing scheme. These are properties that:
 - have been converted into self-contained flats; and
 - the conversion did not comply with the relevant building regulations in

force at that time and still does not comply; and

- less than two thirds of the flats are owner occupied
- are multiple-occupied flats in purpose-built blocks (with over two flats) where more than three people live in the flat.

7.3 Map of the proposed additional HMO licence scheme designation



7.4 What is the evidence to support the council's proposals to implement an additional HMO scheme?

In order to obtain a greater understanding of the HMO tenure in Brent, the council worked with internal and external agencies to review multiple intelligence sources relating to the housing stock in the borough, with a focus on the following key areas:

- Distribution of HMO properties
- Housing conditions of HMOs
- HMO related stressors, including ASB and service demand
- Quality of management of HMOs, including regulation and enforcement.

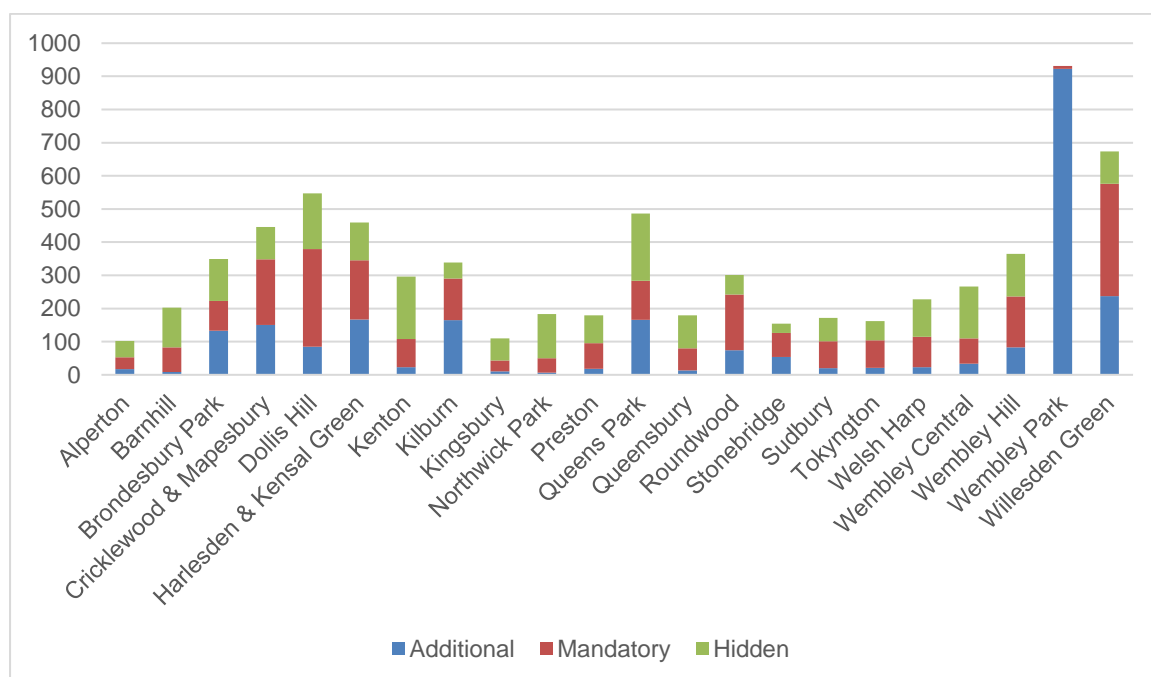
The full results are presented within the Housing Stock Conditions Report (HSCR), which is attached as **Appendix 1** however, some key findings from the report are detailed below.

7.4.1 Distribution of HMOs across the borough

The HMO population in Brent is divided into two main groups:

- licensed HMOs under the additional and mandatory licensing schemes (4,922)
- predicted hidden HMOs (2,209)

The total known and predicted HMO population in Brent is calculated to be 7,131. Wembley Park (931) and Willesden Green (674) have the highest numbers of HMOs.



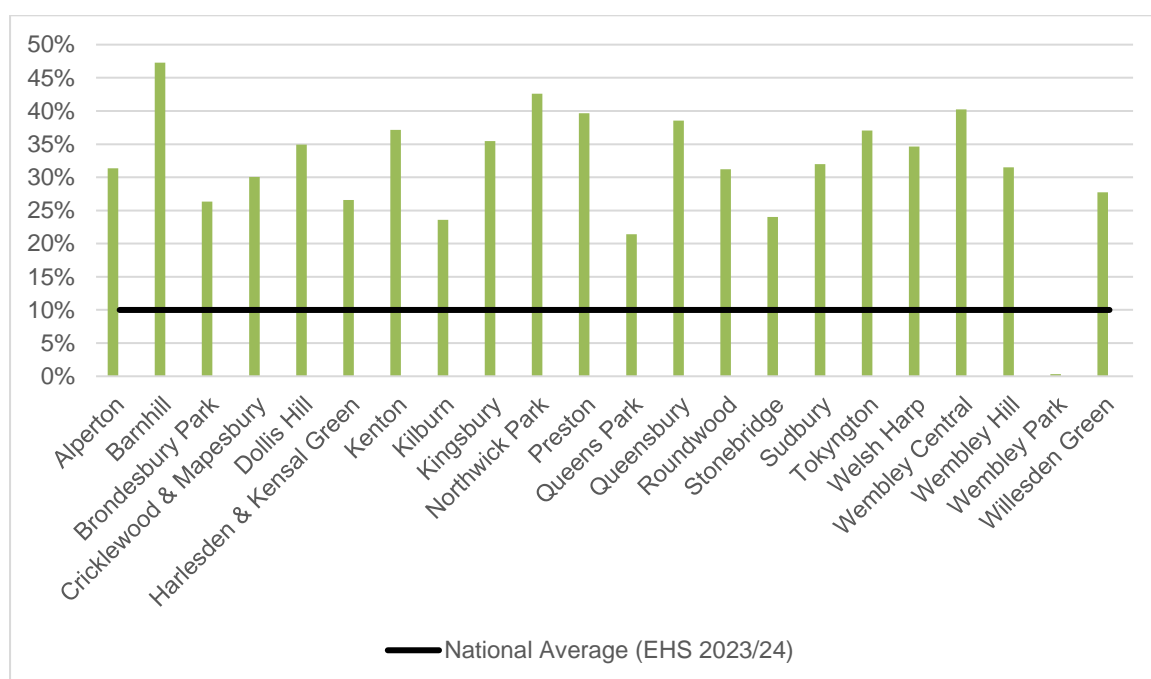
Number of HMOs (additional, mandatory, predicted hidden) by ward

7.4.2 HMOs & housing conditions

The recent review of Brent's HMO stock has provided insights about the predicted presence and distribution of a range of housing factors in HMOs in the borough. HMOs can exhibit some of the worst housing conditions of any tenure if poorly managed. The main finding is that poor housing conditions are likely to be widespread in HMOs across Brent. Under the HHSRS, category 1 hazards are the most serious housing hazards and may result in the immediate risk to a person's

health and safety. A significant category 2 hazard, although less serious or less urgent, can still be regarded as placing the occupiers' health, safety and welfare at risk.

The evidence shows that 1,955 HMOs in Brent are predicted to have one or more serious hazard (HHSRS category 1 and/or high-scoring category 2). This represents nearly 30% of all HMOs in Brent and is significantly above the national average within the private rented sector of 10%³.

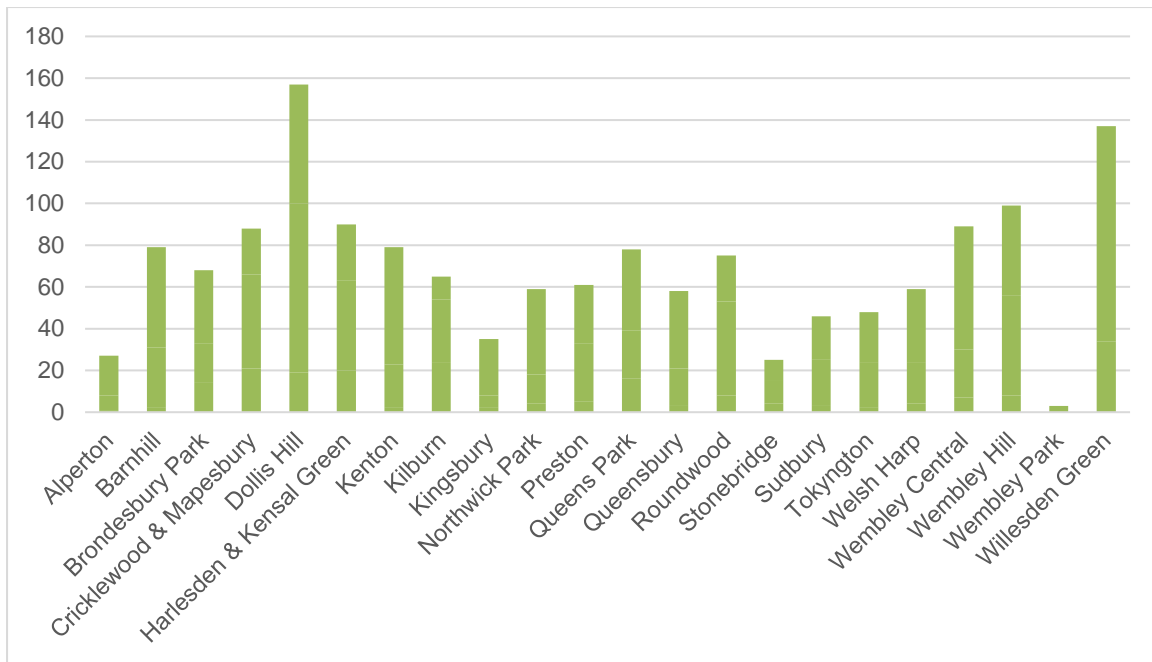


Percentage of all HMOs with 1 or more predicted serious hazard by ward (HSCR 2024)

7.4.3 HMOs & ASB

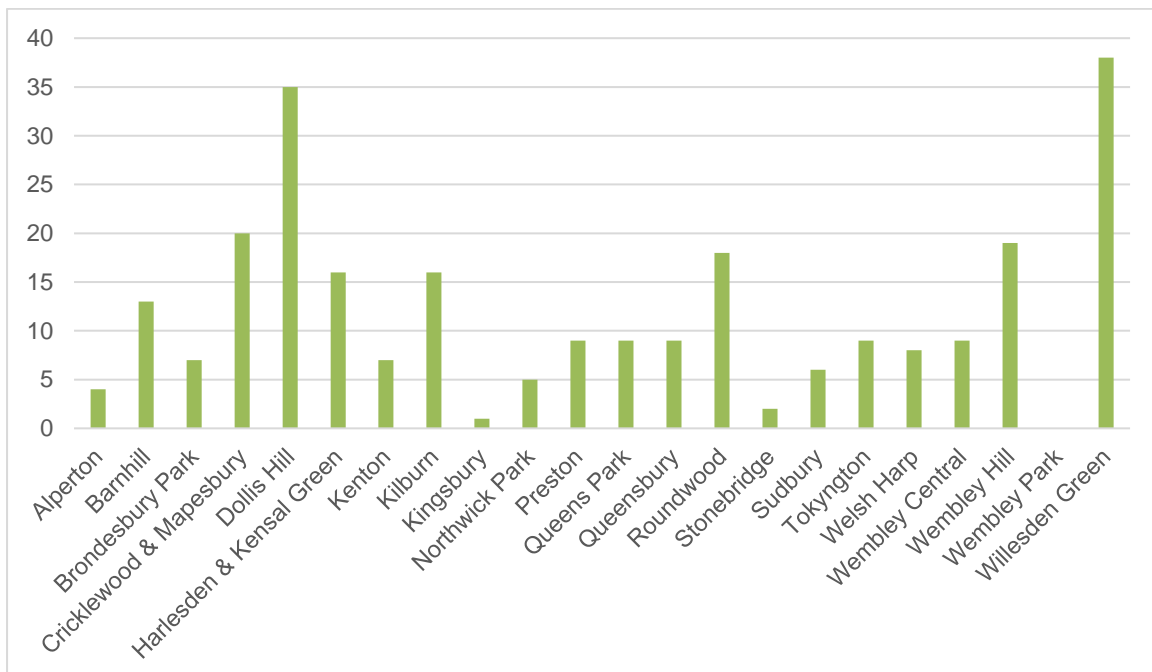
ASB incidents linked to HMOs are distributed across all wards. Over a five-year period 2,366 ASB incidents have been linked to HMOs in Brent.

³ [English Housing Survey 2023/24 Chapter 1: Housing quality](#)

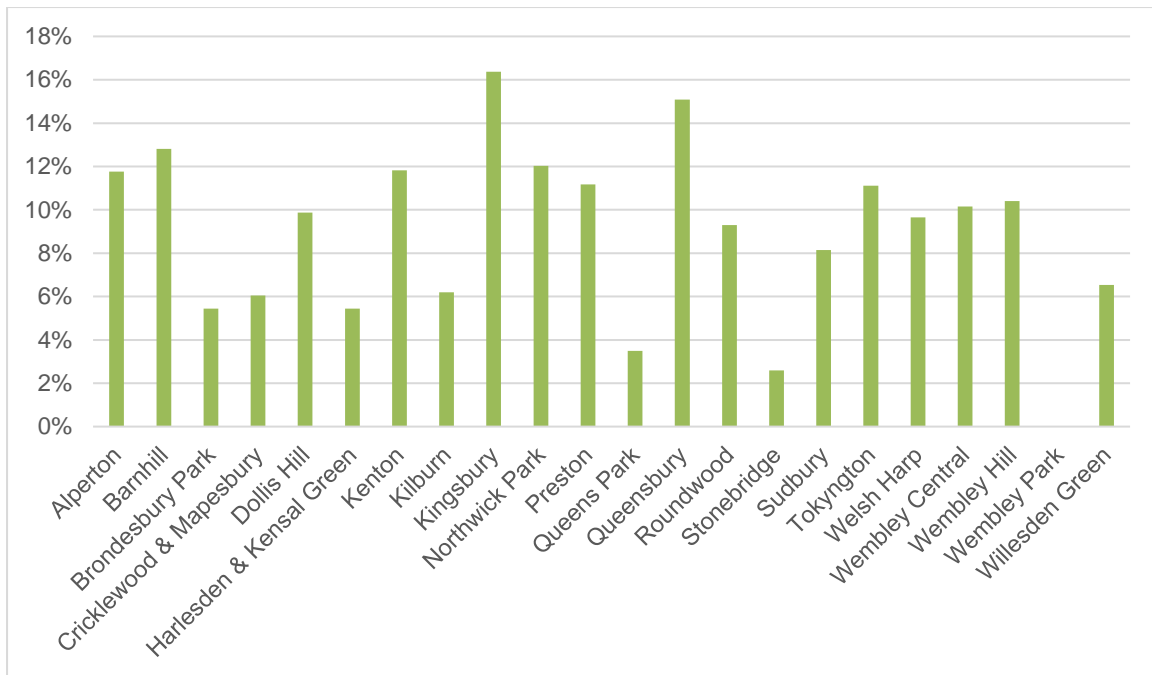


HMOs with at least one ASB incidents by ward (HSCR 2024)

Repeat incidences of ASB (two or more ASB investigations linked to one dwelling) in HMOs indicate that some landlords are failing to take appropriate action to address issues of ASB when it first occurs and is a direct indicator of poor management. Repeat ASB in HMOs is evident within the majority of wards in Brent.



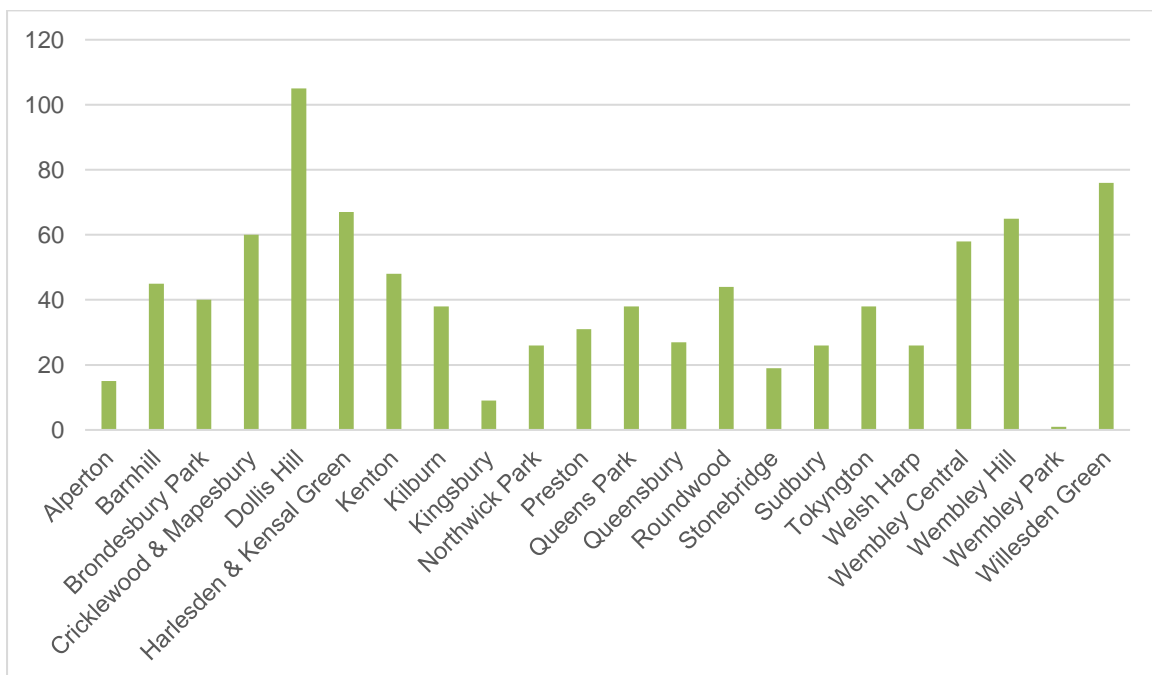
HMOs with two or more ASB incidents by ward (HSCR 2024)



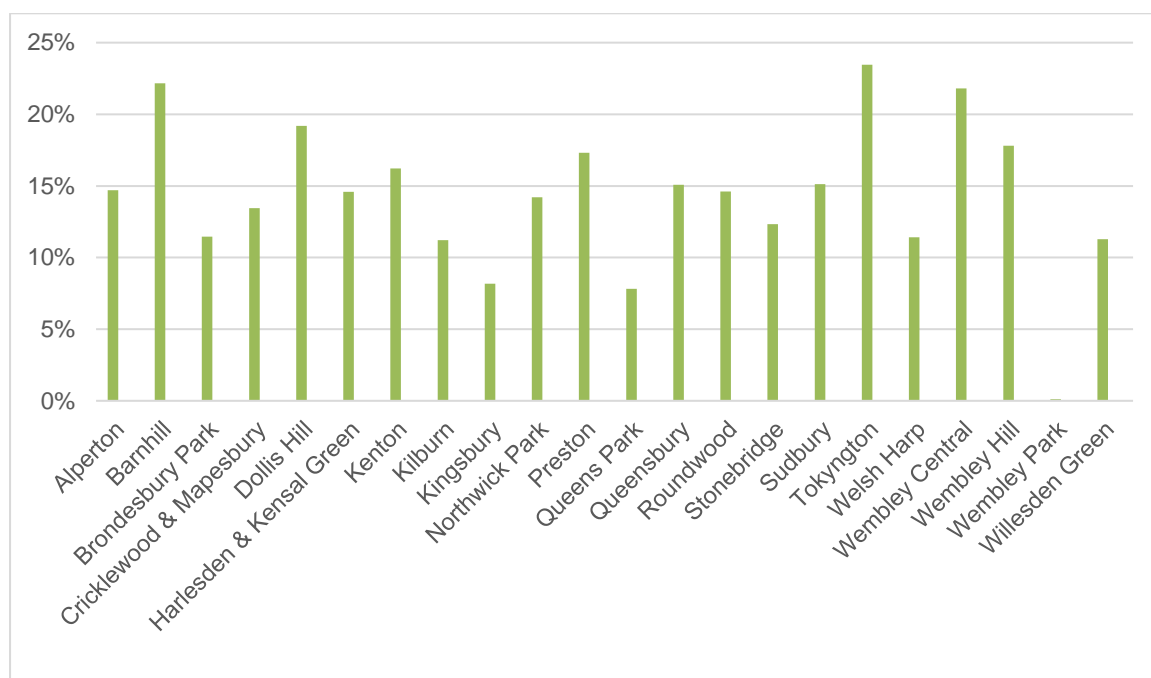
Percentage of HMOs with two or more ASB incidents by ward (HSCR 2024)

7.4.4 Indicators of poor property conditions through complaints

Complaints made by tenants and others to Brent Council about poor property conditions and inadequate property management are a direct indicator of low quality and poorly managed HMOs. Brent received 902 complaints linked to HMOs over five years (2019-2024). HMOs with complaints linked to them are distributed across all wards, with Dollis Hill (105) and Willesden Green (76) having the highest numbers.



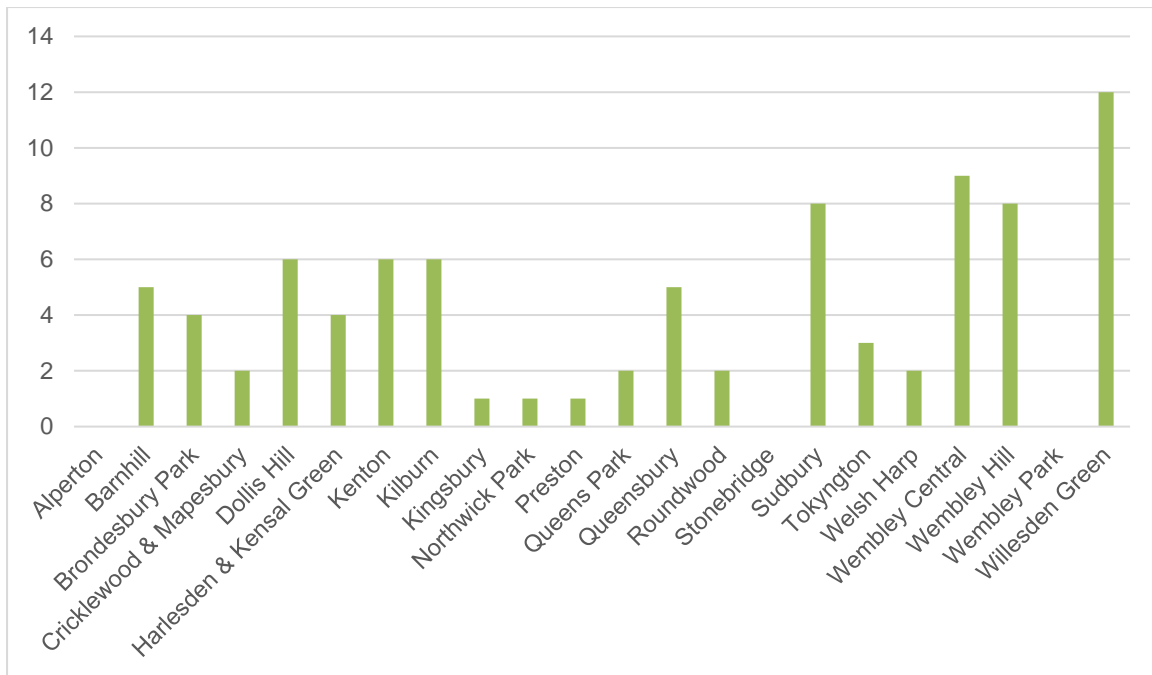
Complaints linked to HMOs by ward (HSCR 2024)



Percentage of HMOs with complaints by ward (HSCR 2024)

7.4.5 Indicators of poor property conditions through enforcement

Responding to complaints in HMOs has required a significant number of council interventions, representing a drain on council resources. Over a five-year period (2019-2024) the council has served 101 civil penalty notices (CPNs) to HMOs (known and hidden). Willesden Green had the greatest number of CPNs served (12) during this period.



HMO CPNs served by ward (HSCR 2024)

7.5 Other factors impacting poor property conditions and property management

7.5.1 Damp and mould

Damp and mould is one of 29 hazards assessed under the HHSRS. The HHSRS is a tool used to assess risks in residential properties. Hazards assessed at the most dangerous level using issued Government guidance are classified as 'category 1'. All other assessable hazards that are judged to be significantly worse than average are 'category 2' hazards. Local authorities have a duty under the Act to take enforcement action on category 1 hazards and a power to take enforcement action on category 2 hazards.

Damp and mould primarily affect the airways and lungs, but they can also affect the eyes and skin. The respiratory effects of damp and mould can cause serious illness and, in the most severe cases, death. The presence of damp and mould can also affect tenants' mental health. This could be due to worries about the health impacts of damp and mould, unpleasant living conditions and destruction of property and belongings, among other concerns.

Everyone is vulnerable to the health impacts of damp and mould, but people with certain health conditions, children and older adults are at greater risk of more severe health impacts. In 2022, the media reported widely on poor conditions caused by damp and mould in social and private rented housing. This was primarily prompted

by highlighting the tragic case of two-year-old Awaab Ishak who died in 2020 due to prolonged exposure to mould in his home.

Certain groups are more likely than others to live in homes with damp and mould⁴. This includes:

- people with a long-term illness
- people who struggle to heat their homes and/or are experiencing fuel poverty
- people on low incomes
- people with disabilities
- people from ethnic minority backgrounds
- people living in temporary accommodation.

7.5.2 Overcrowding

Overcrowding is a secondary impact of housing unaffordability. A household is classified as overcrowded if it has fewer bedrooms than it needs to avoid undesirable sharing, based on the age, sex and relationship of household members. 24.7% of privately rented households within Brent are overcrowded. This is significantly higher than the London average of 15%⁵.

Overcrowding exacerbates hazards such as damp and mould due to the increased laundry and cooking activities required to cater to more people in a confined space. Insulation and ventilation cannot generally cope with the extra demand. The HHSRS states that 'crowded conditions can result in a moisture burden above that which the dwelling is designed to safely deal with, and this can be a cause of condensation and high humidities, giving rise to associated health risk'⁶.

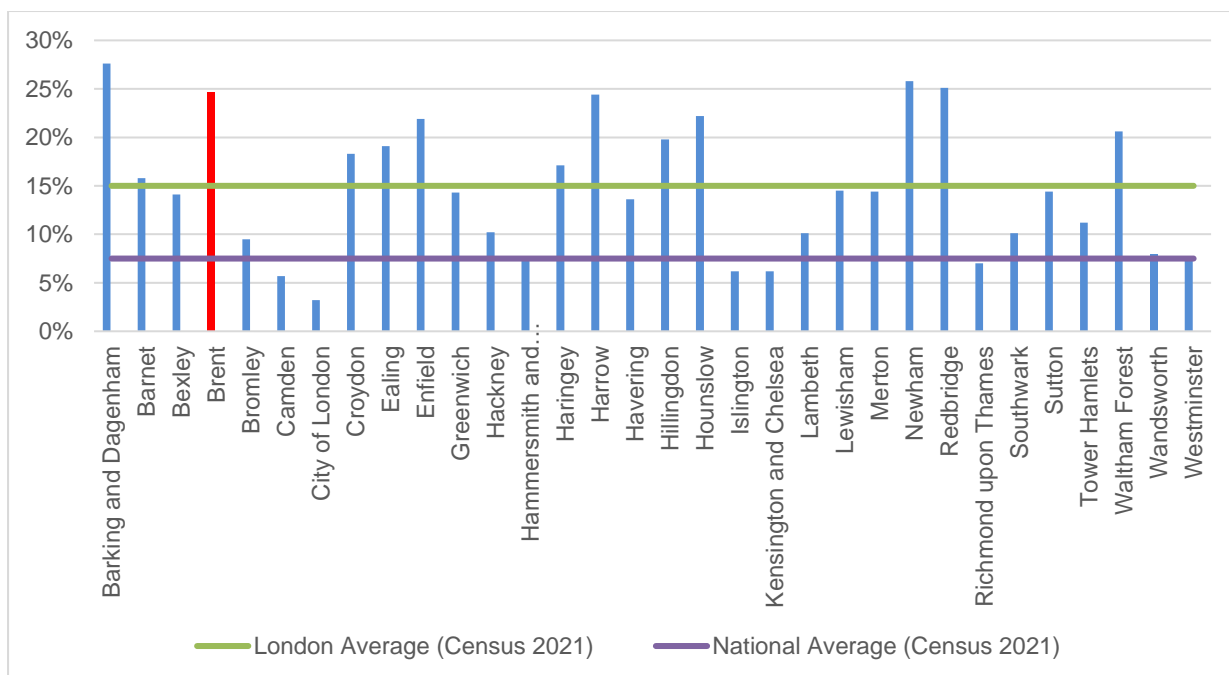
Evidence indicates that poor housing conditions and overcrowding negatively affect physical and mental health and can also have a major impact on educational achievement. For example, children's education may be affected by overcrowding directly, through a lack of space for homework, as well as indirectly because of school absences caused by illness⁷.

⁴ [Understanding and addressing the health risks of damp and mould in the home](https://www.gov.uk/government/consultations/understanding-and-addressing-the-health-risks-of-damp-and-mould-in-the-home) GOV.UK (www.gov.uk)

⁵ Census 2021

⁶ [HHSRS Guidance](#)

⁷ [The impact of bad housing on children's lives \(Shelter\)](#)



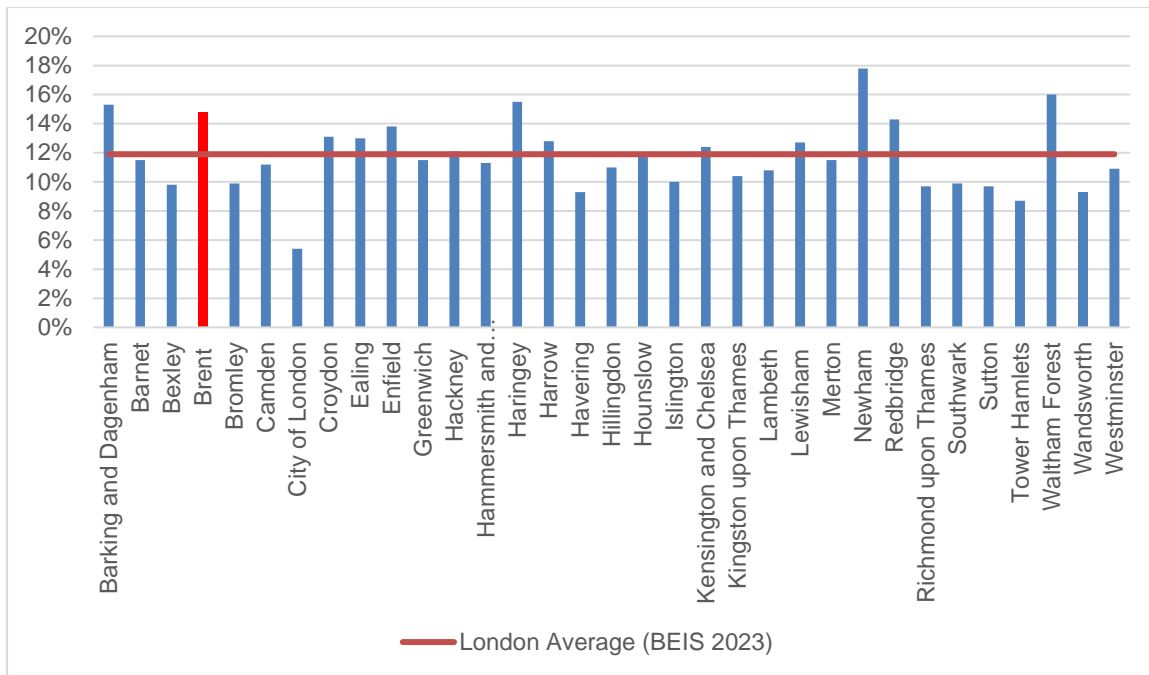
Percentage of overcrowded PRS properties by London borough (Census 2021)

7.5.3 Fuel poverty

Whilst energy prices in the UK are no longer near the extreme highs seen in late 2022 and early 2023, energy prices still remain high and unaffordable for many. With growing pressure on household finances because of increasing energy costs and wider concerns about the cost of living, there are reports that households are choosing between “heating or eating” over the winter months.

The fuel poverty score produced by the Department for Business, Energy & Industrial Strategy (BEIS) using 2021 data and published in 2023 shows that currently Brent has a higher proportion of households in fuel poverty (nearly 15%) than the London average (nearly 12%).⁸ These figures are likely to significantly change at the next point of publishing as a result of the 2022 acute fuel price increases.

⁸ Department for Business, Energy & Industrial Strategy 2021
<https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2021>



Percentage of households in fuel poverty by London borough (BEIS 2023)

7.5.4 Child poverty

Increasingly in Britain, families with young children are living in HMOs, with whole families sometimes renting a single room in an unlicensed property in substandard conditions⁹.

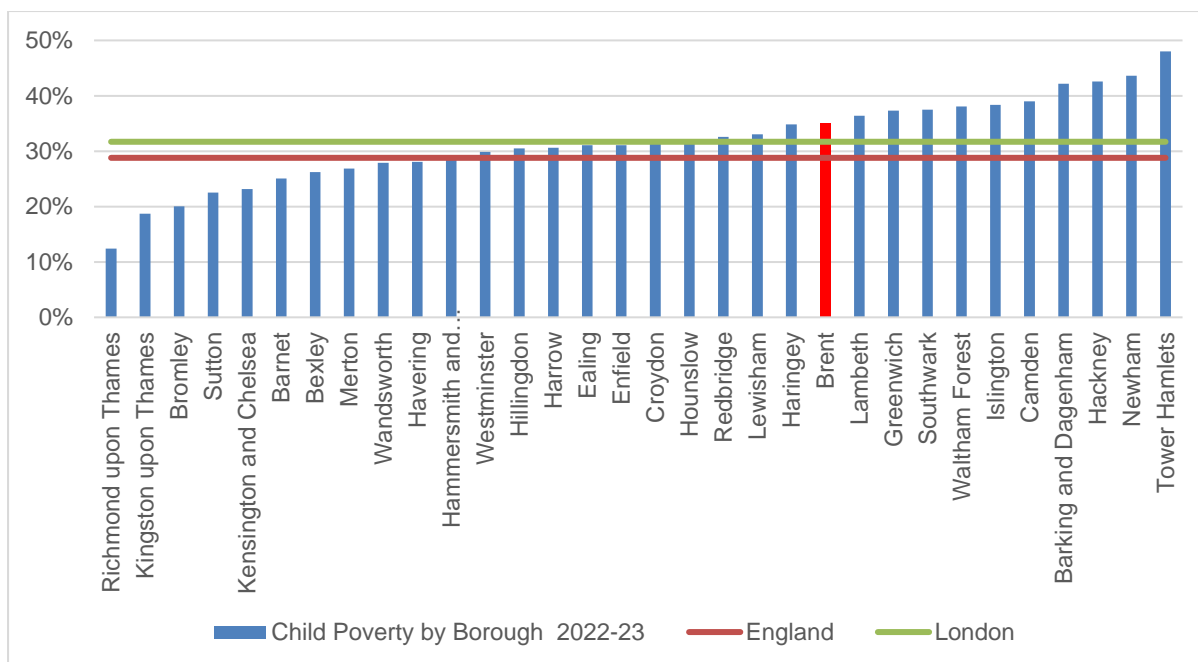
In Brent 35% of children aged 15 years and under experience child poverty after housing costs. This is higher than the England rate of 29% and the London rate of 32%.¹⁰

As the cost-of-living crisis continues, it is likely that many households with children will be unable to afford to put the heating on, making homes more susceptible to damp, mould and cold. Children aged 14 years or under are at the greatest risk of ill health caused by damp and mould in their homes¹¹.

⁹ [Bedsit Britain: 160,000 people in England crammed into unlicensed housing | Housing | The Guardian](#)

¹⁰ [Child Poverty Statistics – End Child Poverty](#)

¹¹ [Housing Health and Safety Rating System \(HHSRS\)](#)



Child poverty after housing costs 2022/23 (End Child Poverty 2024)

7.5.5 Minimum Energy Efficiency Standard (MEES)

An EPC rating is an assessment of a property's energy efficiency. It is primarily used by buyers or renters of residential properties to assess the energy costs associated with heating a house or flat. The rating is from A to G. 'A' indicates a highly efficient property; 'G' indicates low efficiency.

Under the current Minimum Energy Efficiency Standard (MEES), properties must have an Energy Performance Certificate (EPC) rating of E and above before they can be let out. Currently in Brent, 458 HMOs have an E, F or G rating, and approximately 1.1% of HMOs are likely to fail the MEES statutory requirement¹².

The statistical evidence shows that there is a continuous relationship between indoor temperature and vulnerability to cold-related deaths¹³. The colder the dwelling, the greater the risk. The percentage rise in deaths in winter is greater in dwellings with low energy efficiency ratings. Therefore, the F and G properties present a serious risk to the occupants' health, particularly if over the age of 65.

¹² Housing Stock Condition and Stressors Report (Metastreet 2024)

¹³ [Housing Health and Safety Rating System](#)

8 Addressing poor HMO management through licensing

The designation of a boroughwide additional HMO licensing scheme will allow the council to bring about a significant improvement in the management of HMO properties within all wards reducing incidences of serious housing hazards and ASB within the borough throughout the scheme duration.

The evidence shows that a high proportion of HMOs in the borough are being managed ineffectively due to the cumulative presence of serious housing hazards and/or significant and persistent ASB. Through the licensing regime and the granting of licences, standard licence conditions will be imposed that require licence holders to manage their properties proactively and to take reasonable action to address issues identified.

We will ensure that HMOs identified as 'high risk' are prioritised for inspection by officers to check for hazards and compliance with the licence conditions. This will allow the council to take enforcement action (under Part 1 of the Housing Act), where necessary, to improve conditions.

Licensing also gives the council further powers to reduce ASB in HMOs. Without licensing the council are only able to take action against tenants for ASB, as opposed to licensing, which places a duty on landlords to manage ASB in their properties as well. Landlords will receive guidance and advice on managing tenants involved in ASB, particularly in cases of serious ASB requiring formal court action.

The licensing inspection regime will also enable us to identify tenants on low incomes who are living in homes with an E, F or G EPC rating and those who may be affected by fuel poverty. Tenants will be referred to the appropriate services to ensure they receive the available support, and landlords will be advised accordingly. For those whose properties fall below the legal requirement and who ignore the advice and support of the council, the private housing service team will work with trading standards (currently responsible for enforcement of The Domestic Minimum Energy Efficiency Standard (MEES) Regulations) to bring them into compliance.

The council will expect property management issues identified during an inspection to be resolved within a reasonable period, depending on the severity of the issue. improvement notices, overcrowding notices and prohibition orders are formal notices that may be issued to bring about improvements in properties. Landlords who fail to license their properties could also receive a civil penalty or may be

prosecuted.

We will also continue to collaborate with the local Police, the London Fire Brigade, UK Border Agency and other council departments to identify properties that need improvement. The council is committed to working with landlords to address poor property management and assist them in complying with the licence conditions. Information and guidance on managing HMOs will be provided via the council's website and through forums.

We will use licensing to empower HMO tenants by educating them on the standards that they should expect from their rented accommodation, their rights and responsibilities and how to access council services that can support them if needed.

This comprehensive approach ensures that all stakeholders - the council, landlords, and tenants - work together towards improving the living conditions in HMO properties across the borough.

9 Proposed licensing scheme conditions

There are two types of conditions that can be applied to an additional licensing scheme: mandatory and discretionary. The mandatory conditions are required by law (Schedule 4 of the Housing Act 2004) and must be included in a licence. These mandatory conditions do not form part of the consultation.

Discretionary conditions are those which the council can apply for regulating the management, use and occupation of the property and its condition and contents. The proposed discretionary conditions do form part of the consultation and respondents are able to give us their views on these.

In some circumstances, for a particular property, where the council believes there are specific issues not being covered by the discretionary conditions, additional or more specific conditions can be added.

The proposed additional licence conditions are attached as **Appendix 2**. These licence conditions form part of the consultation, and the council welcomes any views on them. Please note, licence conditions will apply to all HMOs in the borough.

10 Proposed HMO licence fee

10.1 Fee proposal

Licence applicants will be required to pay a fee for each HMO property that needs a licence. The HMO licensing fees are set to cover the cost of administering the licensing scheme functions (administration and enforcement).

Licences will normally be granted for the duration of the scheme (up to five years). Where we have concerns about the management and use or occupation of the property, we may grant a licence for a shorter period, usually for 1 year.

The proposed schedule of fees, charges and discounts is attached as **Appendix 3**. These form part of the consultation, and the council welcomes any views on them. Please note, fees will apply to all HMOs in the borough.

10.2 Fee split

By law, the fee must be levied in two parts. Part A will be payable on submission of the application and will cover the cost of processing, administration and validation of the application. Should the application be refused or rejected by the council or withdrawn by the applicant this first Part A payment will not be refunded.

Part B will be payable once the application has been assessed, and the decision is made to grant the licence. This part of the fee is a contribution to the other costs incurred by the council in running, administering and enforcing the licensing scheme. The legal requirement is that fees are split in two parts, however, applicants have the option of making the full payment at the time of making the application.

10.3 Proposed fee amount

We propose an increase from the current £840.00 HMO licensing fee to that proposed below:

Licence Type	Full Fee	Detail	Part A Fee on Application (non-refundable)	Part B Fee on Grant of Licence
Mandatory HMO	£1040.00	Application, processing and inspection of up to five habitable rooms (lounge, dining room or bedroom)	£540.00	£500.00
	£25.00	For each additional habitable room an additional charge per room of....		
Additional HMO	£1040.00	Application, processing and inspection of up to five habitable rooms (lounge, dining room or bedroom)	£540.00	£500.00
	£25.00	For each additional habitable room an additional charge per room of....		

10.4 Proposed fee discount

Nature of discount	Amount
London Landlord Accreditation Scheme membership Applicable to new (first time) applications.	£40 off Part B

10.5 How we calculated the fees

The proposed fees have been calculated on the basis that the schemes will be cost-neutral to the council and will not generate a profit. Licence fees cover our costs of administering the schemes and meeting the scheme objectives that are set out below. A significant proportion of the licence fee income will meet the necessary staffing costs to deliver the scheme outcomes, but the fees will also meet other running costs, such as IT expenditure, with appropriate allowances made for inflationary increases during the life of the scheme.

The proposed fees are underpinned by assumptions about the level of income the fees will generate, based upon the number of properties that we expect to be licensed during the life of the schemes and the numbers of those properties that we expect to be eligible to discounts.

10.6 Fee comparisons

The table below show how the proposed fee compares with the advertised fee structures for other London boroughs with similar schemes.

Local Authority	Additional HMO fee
Brent	£1,040
Waltham Forest	£1,200
Newham	£1,250
Lewisham	£1,000 - £2,500
Southwark	£1,300
Lambeth	£1,518*
Merton	£1,450 - £1,550
Redbridge	£1,698 - £1,800

* Based on a three-bedroom HMO

11 Additional HMO licensing exemptions

Additional HMO licensing applies to all privately rented HMO properties within the designation unless they are licensable under the mandatory licensing scheme or exempt by law.

Schedule 14 of the Housing Act provides an exemption from HMO licensing law for some types of buildings. These include buildings controlled by public sector bodies (for example, housing associations), some buildings occupied by students, and some owner-occupied buildings. A full list of exemptions can be found at [Housing Act 2004 \(https://shorturl.at/v8hfa\)](https://shorturl.at/v8hfa)

12 Alternatives to licensing

We have considered a number of other courses of action, or alternatives to the additional licensing proposals, but do not believe that, individually or collectively they provide an effective, or as effective means of tackling poor property management of HMOs within the borough. The table below shows the alternatives that we have considered and explains why they are not sufficient to meet our objectives.

Alternative Measure	Strengths	Weaknesses
Use of Part 1 Housing Act 2004 enforcement powers [HHSRS] and Public Health powers	<p>Following an investigation, formal statutory notices can be served that require improvements to be carried out to a property.</p> <p>Councils can carry out work in default if a notice is not complied with.</p> <p>Landlords risk being prosecuted if they do not comply with the notice, or the council can impose a civil penalty on the person responsible.</p>	<p>The powers do not place any obligation on landlords to be proactive in improving conditions. Formal action is generally slow, with appeal provisions against most types of notices served, which can significantly delay the time period for compliance.</p> <p>Work in default can be effective but it is expensive and time-consuming to the council, with the risk that not all costs are recovered.</p> <p>Successful prosecutions and civil penalties do not in themselves secure improvements in property conditions and the council's costs in pursuing legal action are often not met in full.</p>
Rely on prosecutions and civil penalties for housing offences	<p>Provides landlords with a disincentive to keep properties in poor conditions.</p>	<p>These powers do not place any obligation on landlords to be proactive in improving conditions. Successful prosecutions, or the imposition of civil penalties, do not in themselves secure improvements in property conditions. The absence</p>

		of licensing significantly reduces the scope of the council to impose civil penalties in respect of identified housing breaches.
Wider promotion of voluntary accreditation schemes to facilitate improvement in management practices and standards	For those landlords who take part, accreditation can increase their knowledge and competence and their ability to effectively manage a property.	This requires voluntary landlord engagement, and rogue operators are unlikely to attend/engage in such schemes.
Improvement grants to improve sub-standard properties	Grants subsidise improvement works, improving standards and giving benefits for landlords and tenants.	<p>Generally, there are few grants available, and the council has very limited scope to offer grants through successful external funding bids. In the most part, grant awards would fund improvements that the landlord should be carrying out to meet their legal obligations.</p> <p>Any grant scheme would be discretionary and would rely on voluntary landlord engagement.</p>
ASB powers	Formal notices can be served at addresses identified as having ASB issues. This can resolve ASB at the particular address.	Action would generally be taken against the tenant in occupation. The powers do not place any obligations on landlords to be proactive in managing their properties to prevent or reduce the likelihood of ASB occurring.
Renters Rights Bill (Introduced to Parliament September 2024)	Will give the council greater enforcement and investigatory powers.	Does not put in place a proactive approach to housing standards and still relies on tenants complaining and landlords being upfront about issues.

Each of the above powers or measures supports the council in achieving the objectives of additional HMO licensing;

- to improve the quality of living conditions for tenants and residents in HMOs
- to improve the management standards and practices of landlords and agents of HMOs
- to improve the health and safety of occupants of HMOs
- to improve the environmental quality and amenity of neighbourhoods

However, the council considers that the best way to achieve these aims is to introduce a further large scale additional HMO licensing scheme, in combination with our other regulatory and enforcement tools, as none of the alternative powers or measures can effectively address the issues and challenges posed by poorly managed HMOs in the borough.

13 Proposed scheme objectives

Licensing is part of a broader, coordinated approach to help improve privately rented properties in Brent. In general terms, we propose to use additional licensing to continue to improve property conditions within the borough, tackle ASB and keep our residents safe. We are committed to improving property conditions and management standards in the PRS, so that it contains good quality accommodation, helps us to achieve sustainable communities and continues to contribute positively to the local economy.

The objectives of our proposed schemes are outlined below:

Objective	Outcome
1. Improve property conditions in HMO properties	<ul style="list-style-type: none">• Licensed HMO properties are inspected, monitored, and licence conditions robustly enforced and complied with• Poor housing conditions in HMOs are improved with category 1 & 2 hazards resolved (including issues such as damp and mould)• HMO properties meet a minimum band E EPC rating (unless an exemption applies)• Improved health, safety and welfare of tenants in HMOs• The council will gain increased knowledge of the PRS in the borough. This will enable targeted enforcement and support for landlords
2. Improve management standards in HMO properties	<ul style="list-style-type: none">• Landlords actively manage their HMO properties or be enforced against• Absentee landlords, or landlords who are not 'fit and proper', employ an agent to actively manage their properties to ensure compliance• Prevention of overcrowding in HMOs

		<p>through better management of property occupancy</p> <ul style="list-style-type: none"> • Greater number of landlords become accredited improving the professionalism of landlords in the PRS • Engagement with landlords improved • Landlords are kept informed of latest legislation and good practice • Responsible landlords will become more involved in council licensing schemes and receive information and support • Irresponsible landlords will be forced to improve their properties or be enforced against.
3.	Reduction in ASB and repeat ASB incidents in HMO properties	<ul style="list-style-type: none"> • Reduction of ASB incidents through better management of HMO properties • Reduction in ASB will improve neighbourhoods making these areas safer and more desirable places to live.
4.	Promote initiatives and provide support to maintain a clean and safe environment	<ul style="list-style-type: none"> • Reduction in repeated waste related incidences (such as fly tipping) linked to HMOs • Improvements to the overall environment, creating better living places.
5.	Increased awareness for tenants on the minimum standards to be expected in rented accommodation and of their rights and responsibilities when renting in the PRS	<ul style="list-style-type: none"> • Information for tenants on the local licensing scheme advertised and third-party support for tenants made available • Officers will support the most vulnerable tenants with their housing and wider needs e.g., benefits assessments, homelessness support • Improved tenants' support through work with third parties • Renters know their rights and

		<p>responsibilities and have greater awareness of and access to council services that can support them</p> <ul style="list-style-type: none"> • Tenants will see economic benefits such as reduced heating costs, bringing them out of fuel poverty.
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14 Licensing and wider council strategies

HMO licensing is an effective tool in improving conditions for private renters and forms an integral part of the council's overarching housing strategy. In addition, licensing can support the delivery of several broader council priorities that recognise the impact of poor property management, housing conditions and antisocial behaviour in residents' lives.

14.1 Brent Corporate Plan

The "[Moving Brent Forward Together for 2023-2027](#)" Borough Plan outlines Brent Council's commitment to creating a prosperous, inclusive, and sustainable community. The plan focuses on five key priorities:

1. Prosperity and Stability in Brent
2. A Cleaner, Greener Future
3. Thriving Communities
4. The Best Start in Life
5. A Healthier Brent

A key outcome of Priority 1 is to deliver 'safe, secure, decent housing' which includes improving the quality of housing in Brent across the private rented sector and the council's own housing stock. The HMO licensing scheme will contribute to the council's vision and assist in achieving this desired outcome by:

1. Improving Housing Quality: The licensing scheme ensures that HMOs meet specific standards, which helps improve the overall quality of housing in the private sector.
2. Safety and Security: By regulating HMOs, the council can enforce safety standards, reducing risks such as fire hazards and ensuring secure and safe living conditions for tenants.
3. Decent Housing: Licensing helps maintain decent living conditions in HMOs by addressing issues like overcrowding and poor management of HMOs, ensuring that all HMOs are fit for habitation.

14.2 Housing Strategy

The [Private Sector Housing Strategy 2024-2029](#) aims to ensure that the private housing sector in Brent is a safe, stable and accessible option for all residents. In order to deliver its vision, the council sets out three key commitments:

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

home, living safe and comfortable lives

The additional HMO licensing scheme is integral to the council achieving these key commitments. The council will ensure all licensed HMOs are inspected, respond to concerns raised about poor property conditions and ASB in HMOs and work with landlords and property managers to ensure compliance with required standards, while taking robust enforcement action using the full range of available powers against landlords who do not maintain their properties, fail to license or deliberately flout licence conditions.

16.3 Homelessness

Brent Council has outlined its strategy to maximise the prevention of homelessness and to minimise the negative impacts of homelessness upon families and individuals where prevention is not possible in the [Brent Homelessness and Rough Sleeping Strategy 2020-2025](#). The council's homelessness review has shown that the loss of a private sector assured-shorthold tenancy is still the most common reason for people to approach the council for help.

Working to improve access to and conditions in the private sector is therefore vital for providing a wider housing offer for Brent residents and the council has committed (commitment 3) to '*work to increase the supply of and access to stable and affordable homes across the borough*'.

Through HMO licensing and enforcement processes, as well as collaboration with local landlords through the Landlord Forum, we will continue to improve standards and drive-up conditions in HMOs and increase the supply of much needed stable homes. This, along with tenant education on rights and responsibilities, will support tenancy sustainment in the PRS and help in reducing homelessness in the borough.

16.4 Empty Homes Programme

The Private Sector Housing Strategy 2024-2029 sets out Brent's vision in relation to empty properties which is to increase the supply of private sector homes available in Brent, so it is an accessible housing option for our residents (commitment 1).

This council aims to reduce the number of long-term empty homes to maximise the existing housing stock, increase the supply of housing and reduce the negative environmental and social impacts associated with vacant properties. This will be achieved through direct engagement with property owners, offering renovation grants, and taking enforcement action when necessary.

The increased level of enforcement activity made possible by an additional HMO

licensing scheme, with officers out in the borough on tasking days and inspections, will unearth more empty homes that can potentially be returned to the private rented market. Empty properties attract nuisance and ASB, so bringing empty properties up to standard and back into use as decent liveable homes is complementary to the objectives of the proposed additional HMO licensing scheme.

16.5 Climate & Ecological Strategy

In 2021, Brent declared a climate and ecological emergency and pledged to achieve carbon neutrality in the borough by 2030. The [Brent Climate & Ecological Strategy 2021-2030](#) recognises that better insulating homes and making them more energy efficient is one of the key actions that must be taken to reduce carbon emissions.

Additional HMO licensing will contribute to achieving Brent's climate change vision by enforcing energy efficient standards in the PRS, helping to reduce the overall energy consumption and carbon emissions of the borough.

16.6 Anti-Social Behaviour

The council has committed to effectively and proportionately challenging any form of ASB within its [Safer Brent Community Safety Strategy 2024-2026](#). Residents have the right to quiet and peaceful enjoyment of their environment, and the council ensures cases are resolved through effective intervention and support services.

To tackle ASB problems, we have made it conditional on all private landlords who hold licences under the additional HMO licensing scheme to 'take reasonable and practicable steps to prevent or address problems of antisocial behaviour resulting from the conduct of occupiers or visitors to the HMO'. Section 57(5) of the Housing Act 2004 gives a definition of ASB for the purposes of licensing under Part 3 of the Act.

We will use all tools and powers available to support those affected by ASB and to take action, including prosecution, against licence holders who do not take adequate steps to tackle ASB. The Housing Act 2004 refers to an offence being committed if a landlord breaches a condition of a licence without reasonable excuse.

The additional HMO licensing scheme will encourage landlords to work with their tenants to reduce ASB, with information and support available online and through forums.

15 Further information

The Public Sector Equality Duty (PSED), Section 149 of the Equality Act 2010 requires the council to have “due regard” to its equality aims when exercising its public functions. Brent Council believe that an Equality Analysis (EA) is the best method to demonstrate compliance with the PSED. An Equality Analysis was carried out as part of these proposals. The results of the EA are attached as **Appendix 4**.

16 Appendices

Appendix 1	Housing Stock Condition and Stressors Report (Metastreet, 2024)
Appendix 2	Additional HMO Licence Conditions
Appendix 3	Schedule of Proposed Fees, Charges and Discounts
Appendix 4	Equality Analysis

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London Borough of Brent

Houses in Multiple Occupation: Housing Stock Condition and
Stressors Report

December 2024



Executive Summary

Metastreet were commissioned by the London Borough of Brent to review Houses in Multiple Occupation in the borough and assess stressors related to the private rented sub-tenure.

The detailed information provided in this report will facilitate the development and delivery of Brent's housing interventions and enable a targeted approach to tackling poor housing.

The main aim of this review was to investigate and provide accurate estimates of:

- Information on the number of Houses in Multiple Occupation (HMOs) as a subset of the private rented sector (PRS).
- Levels of serious hazards that might amount to a Category 1 & 2 hazard (HHSRS) within the HMO population.
- Other housing related stressors, including antisocial behaviour (ASB & service demand) linked directly to HMOs.
- Assist the council to make policy decisions, including a possible redesignation of property licensing schemes under Part 2 of Housing Act 2004.

Metastreet has developed a stock-modelling approach based on metadata and machine learning to provide insights about the prevalence and distribution of a range of housing stressors and factors.

The housing models are developed using unique property reference numbers (UPRN) as a data key, which provide detailed analysis at the property level.

Data records used to form the foundation of this report include but are not limited to:

Council tax	Property licensing	Other council interventions records	Tenancy deposit data
Housing benefit	Private housing complaints and interventions records	ASB complaints and interventions records	Energy Performance data

Key Findings

- The HMO population of Brent is calculated to be 7,131 properties.
- The HMO population in Brent is made up of two main categories; licenced HMOs (Additional and Mandatory) that share basic amenities (4,922); predicted hidden HMOs that share basic amenities (2,209).
- The most common HMO property type in Brent are houses (70%), while bungalows are the least common property types (1%).
- Brent recorded 902 HMO complaints (one or more) at HMOs (all types) from tenants and others over a 5-year period (April 2019 – March 2024).
- There were 166 repeated complaints in Brent at All HMOs (known and hidden) for the period April 2019 – March 2024.
- There are 1,955 HMO (known and Predicted/hidden) properties in Brent that are likely to have at least 1 serious housing hazard (Category 1 & 2 hazards, HHSRS).
- Of the known and Predicted/hidden HMO population, 27% are predicted to have at least 1 hazard (Category 1 & 2, HHSRS), more than double the PRS national average (12%).
- There were 1,525 HMOs (all types) linked to Anti-social Behaviour incidents in the period April 2019 – March 2024.
- A total of 2,366 ASB incidents have been matched to all HMO properties (known and predicted hidden) for the period April 2019 – March 2024.
- There were 518 HMOs (all types, known and Predicted/hidden) with repeat ASB incidents over the period April 2019 — March 2024.
- Over a 5-year period (2019-24), Brent Council used its regulation powers to serve 101 Civil Penalty Notices (CPN) to HMOs (known and Predicted/hidden).
- Between April 2019 and March 2024, Brent Council served 87 Civil Penalty Notices (CPN) to Known HMOs (Additional and Mandatory) under housing and public protection legislation.
- Between April 2019 and March 2024, Brent Council served 14 Civil Penalty Notices (CPN) to Predicted/hidden HMOs under housing and public protection legislation.

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1 Introduction & Project Objectives

Metastreet were commissioned by the London Borough of Brent to review its HMO housing stock with a focus on the following key areas:

- Distribution of HMOs
- Housing conditions of HMOs
- HMO related stressors, including Anti-Social Behaviour (ASB) & service demand.
- Quality of management of HMOs, including regulation and enforcement

The report provides the council with the evidence base for developing housing and service interventions. The report also assists with the council's responsibility to review its housing stock as set out under Part 1, Section 3 of the Housing Act 2004.

For the purposes of this review, it was decided that a ward-level summary is the most appropriate basis to assess housing conditions across Brent, built up from property level data.

Predictive tenure models (Ti) have been developed as part of this project which are unique to Brent, they include:

- Serious housing hazards (Category 1 and/or high scoring Category 2 hazards, HHSRS A-D)
- Houses in Multiple Occupation (shared amenity HMOs, Section 254)

All data used in this report is taken from Brent's own service records over the last 5 years (April 2019 – March 2024) and other open-source property level data. An updated data frame focused on HMOs has been developed specifically for this project.

The appendices to the report contain a summary of the data and a more detailed report methodology.

2 London Borough of Brent and HMOs

Brent is a London borough in North London. It covers an area of 43.2km². It borders the London boroughs of Barnet and Harrow to the northwest, Camden to the east, Ealing to the south, with Hammersmith and Fulham to the south. Kensington & Chelsea, and the city of Westminster lie to the southeast. Districts include Wembley in the west, ¹_[OBJ].

Houses in Multiple Occupancy (HMO) identified as part of this study have been divided into two main categories and two separate licence types. The first category is known HMOs that share basic amenities (Housing Act 2004, Section 254) that have been licenced under either **Mandatory** or **Additional** licensing powers.

The second category are properties that are predicted **hidden** HMO that share basic amenities (Housing Act 2004, Section 254) but have not been licensed under either Mandatory or Additional licensing powers (Predicted/hidden HMOs). It is assumed that this group of properties is inhabited by three or more occupiers, residing in two or more distinct households, and sharing common amenities like a kitchen or bathroom.

Any HMO meeting the following criteria requires a **Mandatory licence** in Brent.

- Dwellings inhabited by five or more occupiers, residing in two or more distinct households, and sharing common amenities like a kitchen or bathroom. This regulation applies irrespective of the number of floors.
- Self-contained flats located within a building comprising up to two flats. If either or both flats are inhabited by five or more individuals from two or more separate households, licensing is Mandatory.

Any HMO meeting the following criteria requires an **Additional licence** in Brent.

- Dwellings inhabited by 3 or 4 occupiers, residing in two or more distinct households, and sharing common amenities like a kitchen or bathroom.

It's important to note, there are number of exemptions from HMO property licensing, including:

- Buildings managed by a local housing authority, registered social landlord, police, fire & rescue authority or health service body.
- Buildings already regulated under certain other statutory provisions (Schedule 1 to SI 2006 Number 373).

¹ Wikipedia, November 2024, https://en.wikipedia.org/wiki/London_Borough_of_Brent

- Certain student halls of residence.
- Buildings occupied principally for the purposes of a religious community whose principal occupation is prayer, contemplation, education or the relief of suffering; and
- Building's owner occupied with no more than two lodgers.

Therefore, it should not be assumed that the number of HMOs is equal to the number of licensable HMOs in any given area.

3 Methodology

Tenure Intelligence (Ti) uses council held and publicly available data to identify tenure and analyse property stressors, including property conditions and ASB. Metastreet has collaborated with the council to create a residential property data warehouse focused on the known and predicted HMO population. This has been developed by using a mixture of licence holder and application flags held by the authority and predictive models. Therefore, there is a very high confidence that the 'known' study group are HMOs because they have been assessed and, in many cases, inspected by the authority to establish their tenure.

The project has included linking large amounts of council and externally held data to unique property references (UPRN).

Machine learning has been used for property condition predictions based on training data taken from a contemporary sample of known outcomes. Results are analysed to produce a summary of housing stock, predictions of Category 1 and/or high scoring Category 2 hazards, HHSRS A-D.

Different combinations of risk factors were systematically analysed for their predictive power in terms of key outcomes. Risk factors that duplicated other risk factors but were weaker in their predictive effect were systematically eliminated. Risk factors that were not statistically significant were also excluded through the same processes of elimination.

It is important to note that this approach can never be 100% accurate as all large datasets and statistical models include some level of error. A more detailed description of the methodology and the specific factors selected to build predictive models for this project can be found in Appendix 2.

All specified and requested council held longitudinal data is from April 2019 – March 2024 unless otherwise specified.

Where appropriate and where the data allows, the findings for different HMO types (described previously) have been presented separately.

4 HMO Population: Distribution & Occupancy

The HMO population can be examined in two ways; by looking at the number of HMO properties across the various wards, and by the occupancy type (kind of property inhabited).

4.1 HMO populations

The HMO population in Brent is made up of two main categories (described previously); licenced HMOs (Additional and Mandatory) that share basic amenities (4,922); and Predicted/hidden HMOs that share basic amenities (2,209). The total HMO population in Brent is therefore calculated to be **7,131**.

Licensed HMOs (Additional and Mandatory) are spread across all wards in Brent. Wembley Park has the highest (931) number of HMO licenses (Figure 1).

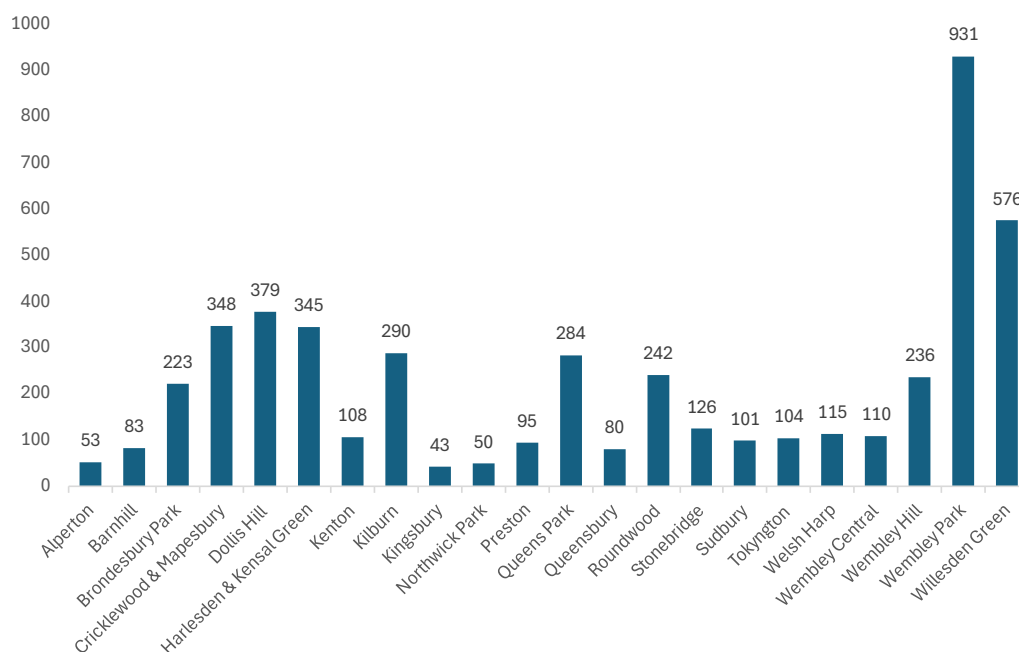
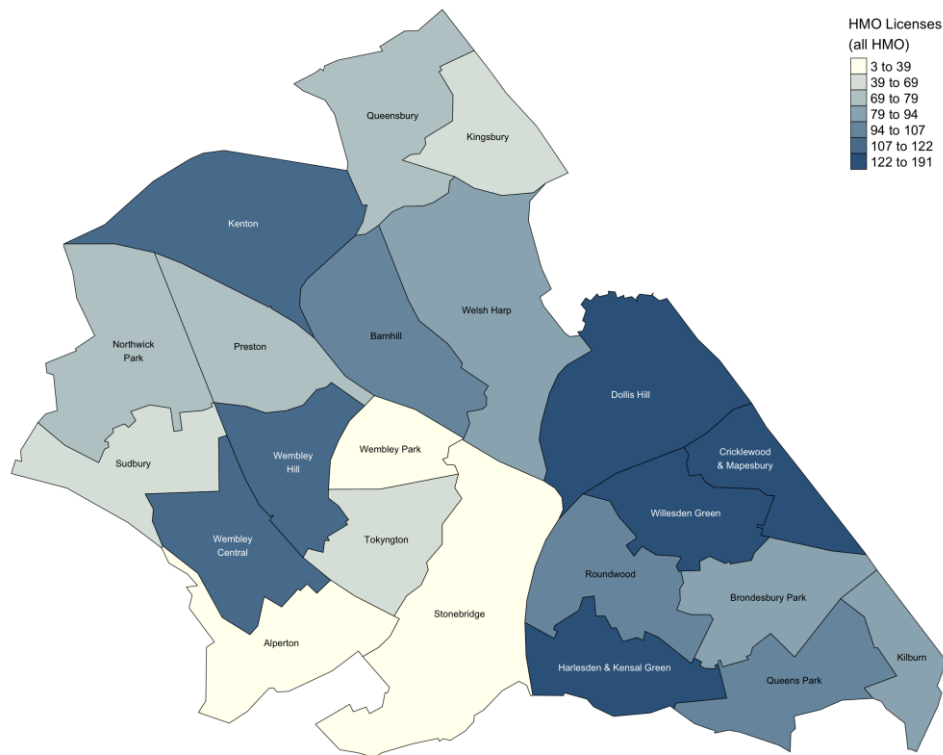


Figure 1. Licensed HMO population (Additional and Mandatory) by ward (Source Ti 2024).

HMO licenses for Additional and Mandatory HMOs are distributed throughout Brent, with a slight bias towards the eastern wards (Map 1).



Map 1. Distribution of licensed HMOs (Additional & Mandatory) by ward (Source: TI 2024, Map by Metastreet).

4.1.1 All HMOs

The HMO population is distributed across all wards. Wembley Park (931) has the most HMOs, whilst Alperton has the least (102) (Figure 2).

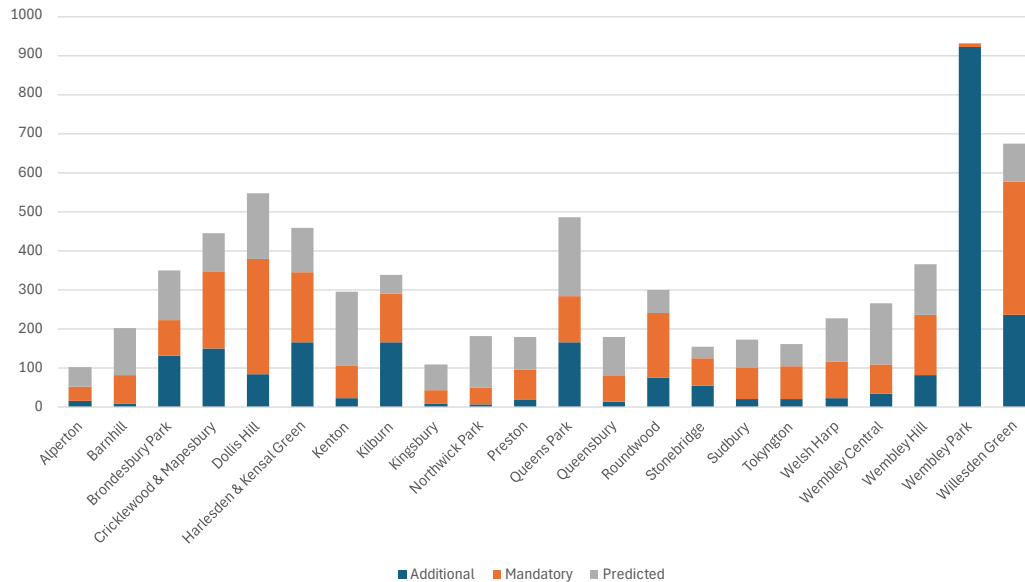
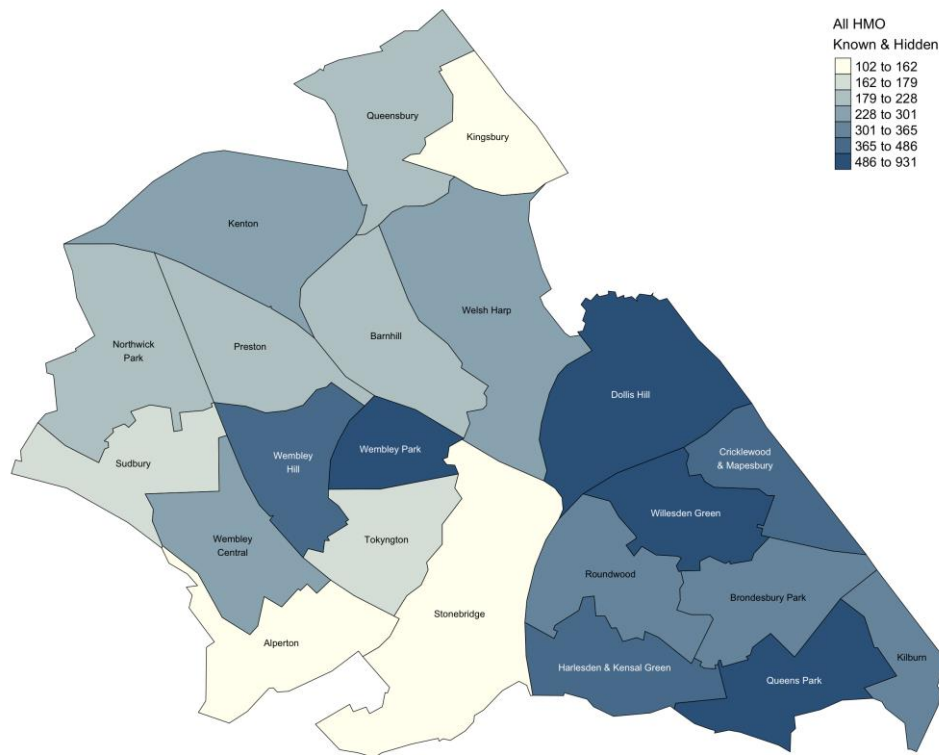


Figure 2. Total HMO population (all types) by ward (Source Ti 2024).

HMO properties are spread throughout the borough of Brent, although there are generally greater numbers in the eastern wards (Map 2).



Map 2. Distribution of All HMOs by ward (Source: TI 2024, Map by Metastreet).

4.1.2 Additional HMOs

Wembley Park has the most Additional HMOs (923) but is something of an anomaly (Figure 3). Other wards with substantial Additional HMOs are Willesden Green (237), Harlesden & Kensal Green (167), Queens Park (166), and Kensal (165).

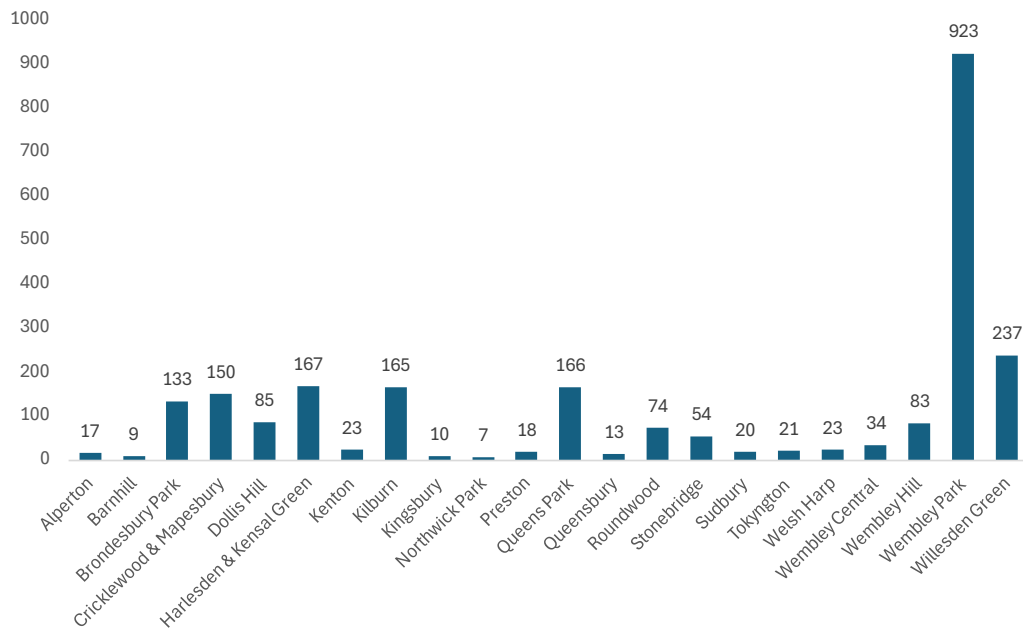
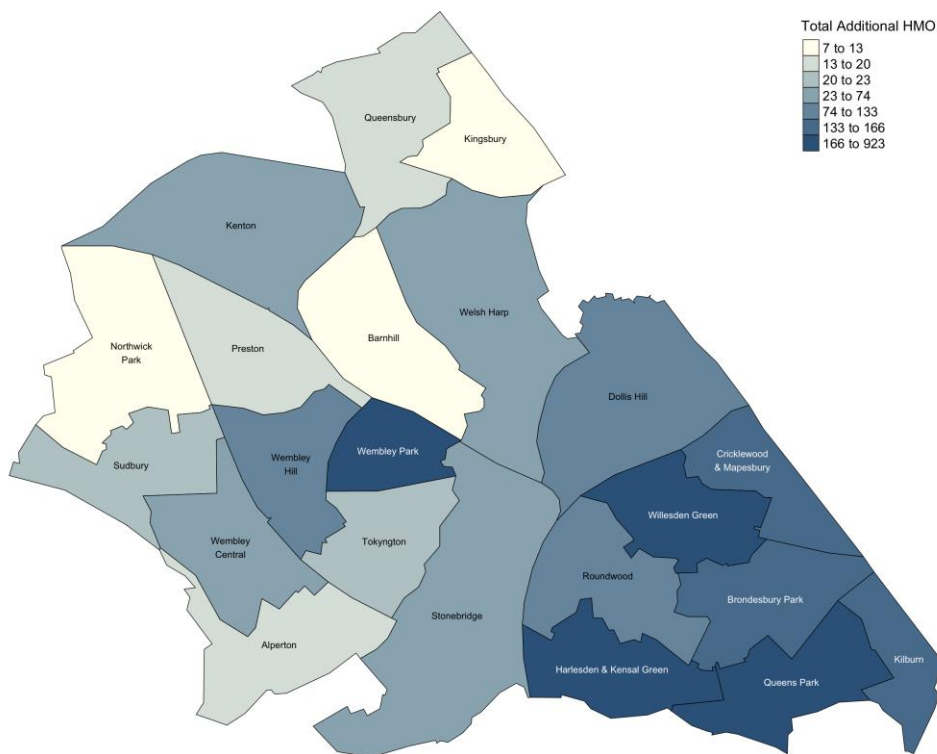


Figure 3. Number of Additional HMOs by ward (Source Ti 2024).

Although Additional HMOs are spread throughout the borough of Brent, there are more in the eastern wards (Map 3).



Map 3. Distribution of Additional HMOs by ward (Source: Ti 2024, Map by Metastreet).

4.1.3 Mandatory HMOs

There are similar numbers of Mandatory HMOs (2,490) and Additional HMOs (2,432). Willesden Green ward (339) has the highest number of Mandatory licences (Figure 4).

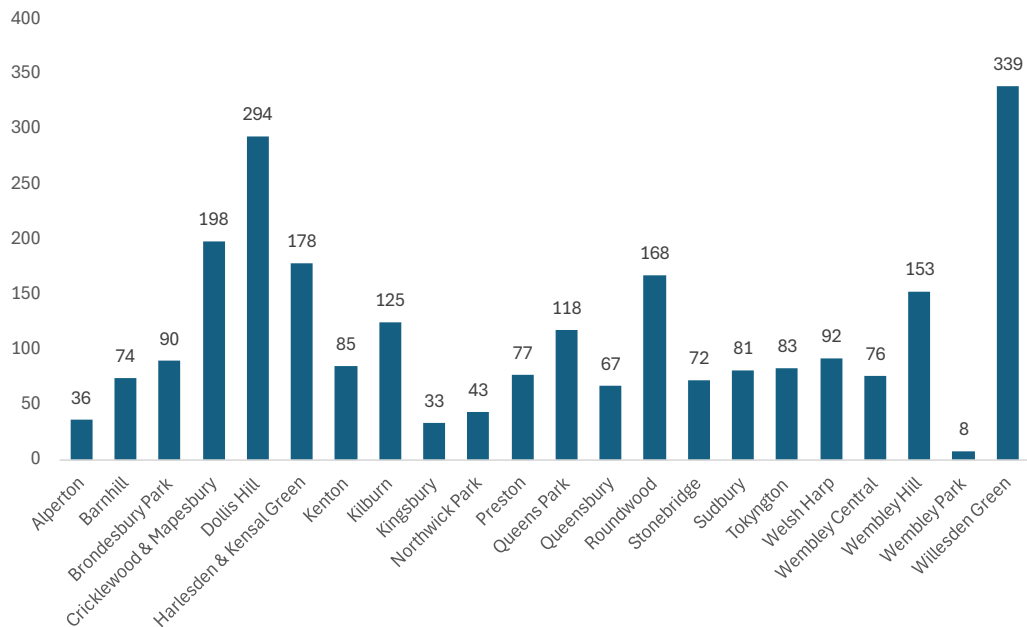
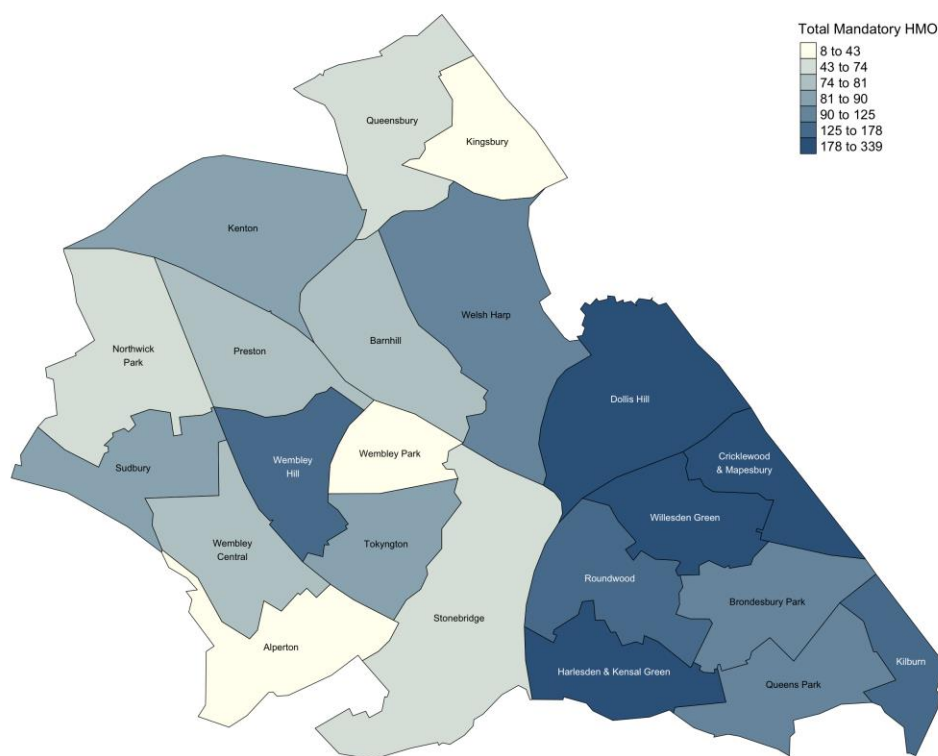


Figure 4. Number of Mandatory HMOs by ward (Source Ti 2024).

Although Mandatory HMOs are distributed across the borough of Brent, there are more in the eastern wards (Map 4).



Map 4. Distribution of Mandatory HMOs by ward (Source: Ti 2024, Map by Metastreet).

4.1.4 Predicted/Hidden HMOs

Predicted/hidden HMOs (2,209) make up 31% of the total. This group may either be exempt from licencing, unlicensed, or licenced as a single-family dwelling. It is not possible to identify from the data (where licensable) if the predicted hidden HMO properties would fall under Additional or Mandatory requirements. Queens Park has the highest number of Predicted/hidden HMOs (202) (Figure 5).

The predictions regarding whether a property is classified as an HMO are a critical component of the modelling exercise. Each UPRN is evaluated individually as part of the modelling process, with the model assigning a likelihood (probability) to its classification. Once the modelling has completed the

predictions, we use a probability of 90% as a cut-off.

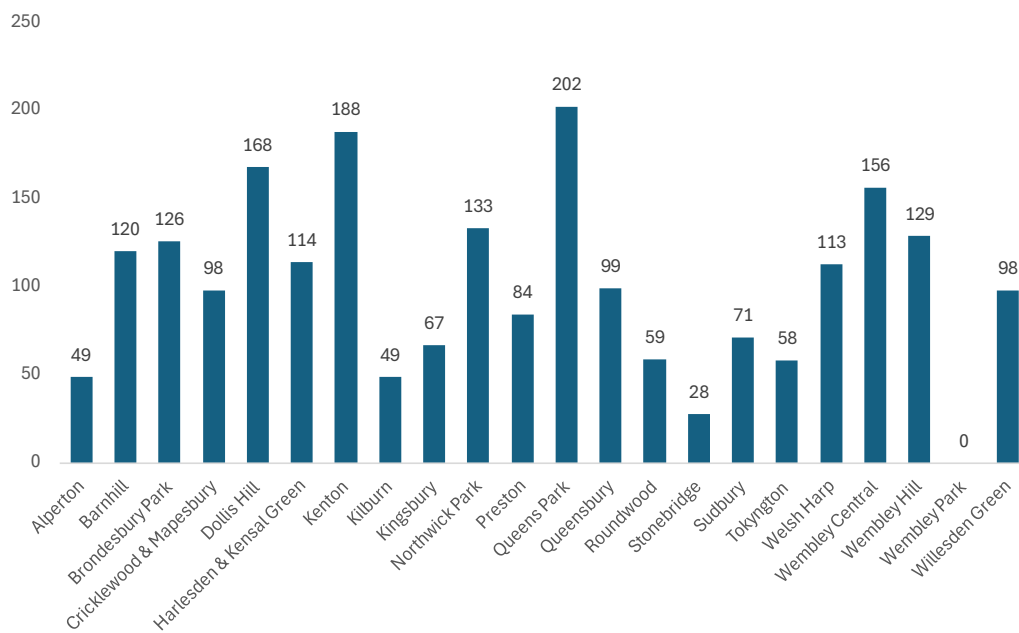
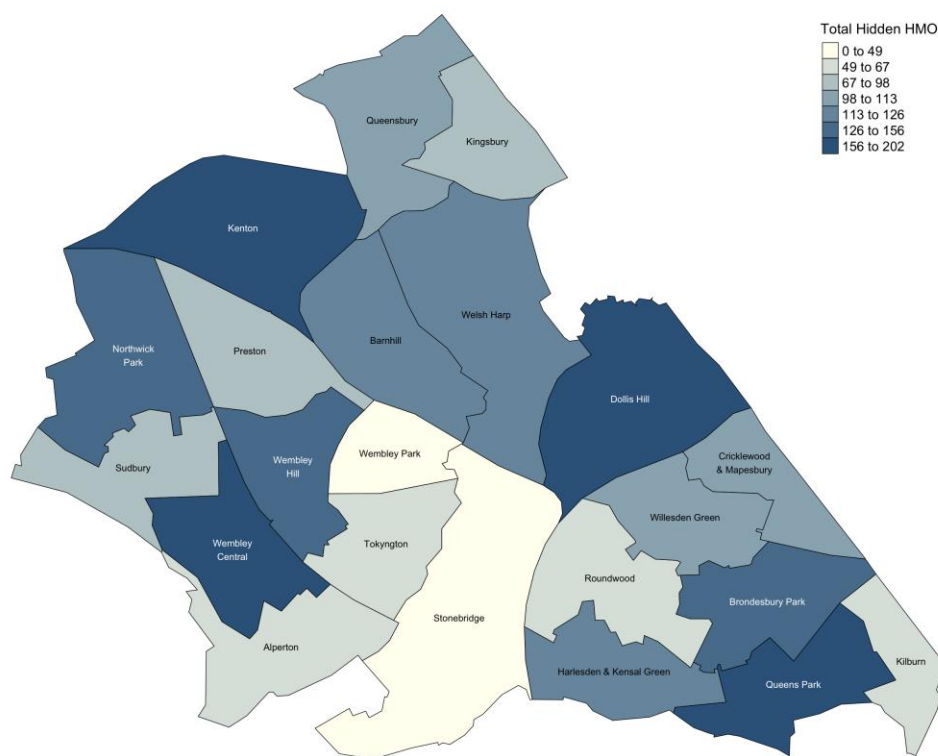


Figure 5. Number of Predicted/hidden HMOs by ward (Source Ti 2024).

Predicted/hidden HMOs are distributed across all wards (except Wembley Park, which has none); with greater concentrations not showing any geographical bias (Map 5).



Map 5. Distribution of Predicted/hidden HMOs by ward (Source: Ti 2024, Map by Metastreet).

The percentage of Predicted/hidden HMOs for each ward was calculated (Figure 6). A high percentage of Predicted/hidden HMOs would show that there are potentially many more unlicensed HMOs than in a ward with a low percentage. Northwick Park for example has the highest percentage of Predicted/hidden (therefore unlicensed) HMOs (73%).

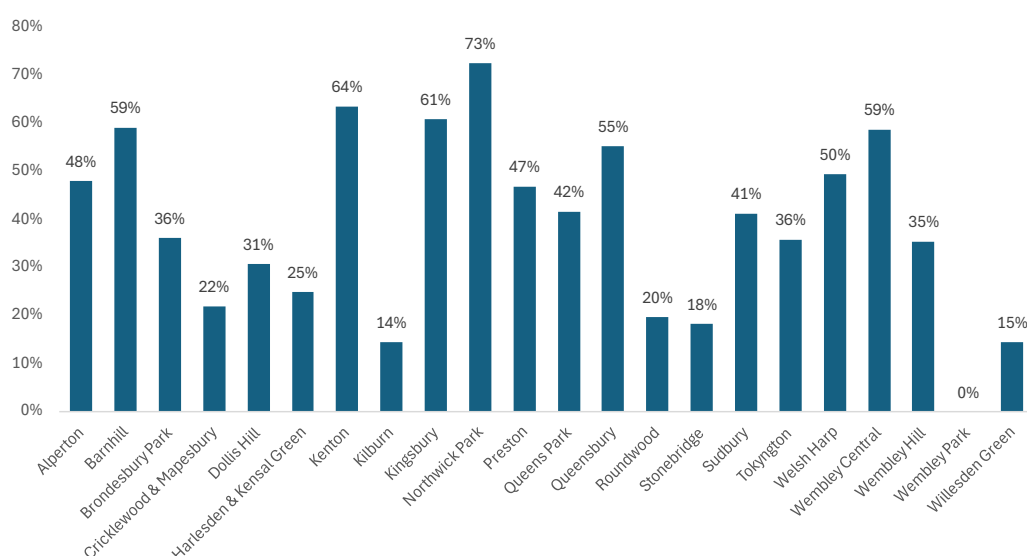


Figure 6. Percentage of Predicted/hidden HMOs by ward (Source Ti 2024).

4.2 Property type

HMO property type profile offers an indication of HMO makeup, density, and construction type. Inspection data and Energy Performance Certificate (EPC) records have been analysed. The most common property type in Brent are houses (70%), while bungalows are the least common property types (1%). Flats make up 26% of the HMO properties (Figure 7).

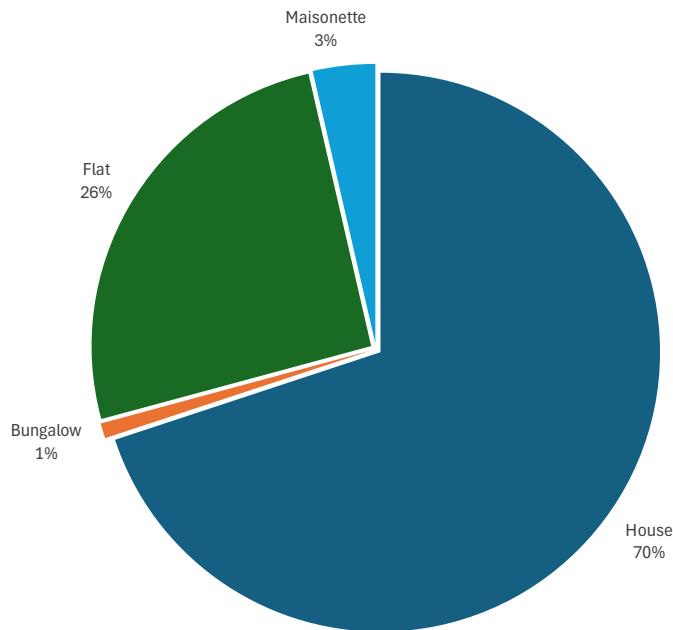


Figure 7. HMO (all types, known and hidden) property types (Source Ti 2024).

Flats and houses make up most of the housing types in Brent. Of properties for which data is available, flats make up 65% of the total (with houses 31%) (Source: Ti data from EPC). However, the proportion of flats that are HMO (Additional, Mandatory, or Predicted/hidden) is much smaller (26%), whilst the proportion of houses that are HMO is larger (70%, Figure 7).

The prevalence of houses as HMO is typical of the sector. Houses generally have more space and lend themselves to being HMOs. Thus, the higher proportion of houses as HMO when compared to the overall housing stock.

5 HMO Standards & Management

Housing conditions are affected by the level of maintenance, quality of repair & management, the age of the property, thermal efficiency, and type of construction.

Proper management of HMOs is necessary to safeguard the tenants and the wider community. The HMO Management Regulations require the manager to keep all parts of the HMO safe, clean and well maintained. They also place a duty on tenants of HMOs to cooperate with the manager and not damage any fire safety equipment². HMOs can exhibit some of the poorest housing conditions of any tenure if poorly managed. Therefore, HMO managers are required to comply with licence conditions and HMO Management Regulations. These include space standards, repair obligations, fire precautions and testing, waste management and tenancy management³.

5.1 Complaints from tenants and others

Complaints made by tenants and others to Brent Council regarding poor property conditions and inadequate property management are a direct indicator of low quality and poorly managed HMOs.

5.1.1 All HMOs

Brent recorded 902 complaints about HMOs (known and hidden) from tenants and others over the period April 2019 – March 2024. Dollis Hill has the greatest total number of HMO complaints (105), whilst Wembley Park (1) has the fewest (Figure 8).

² The Licensing and Management of Houses in Multiple Occupation (Additional Provisions) (England) Regulations 2007, <https://www.legislation.gov.uk/uksi/2007/1903/contents/made>

³ Regulating the Privately Rented Housing Sector, Evidence into Practice, Edited By Jill Stewart, Russell Moffatt, (2022) <https://www.routledge.com/Regulating-the-Privately-Rented-Housing-Sector-Evidence-into-Practice/Stewart-Moffatt/p/book/9781032159690>

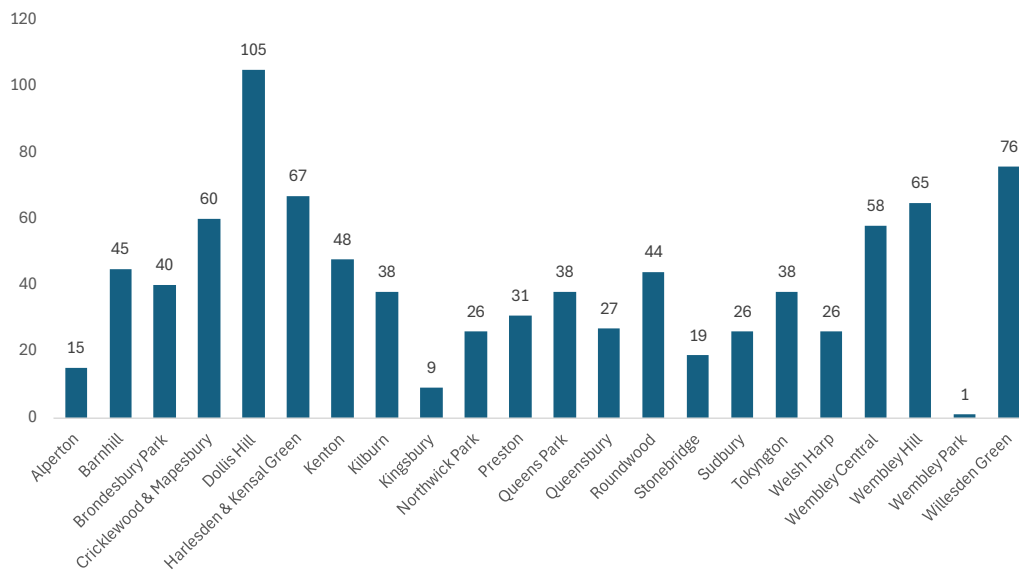
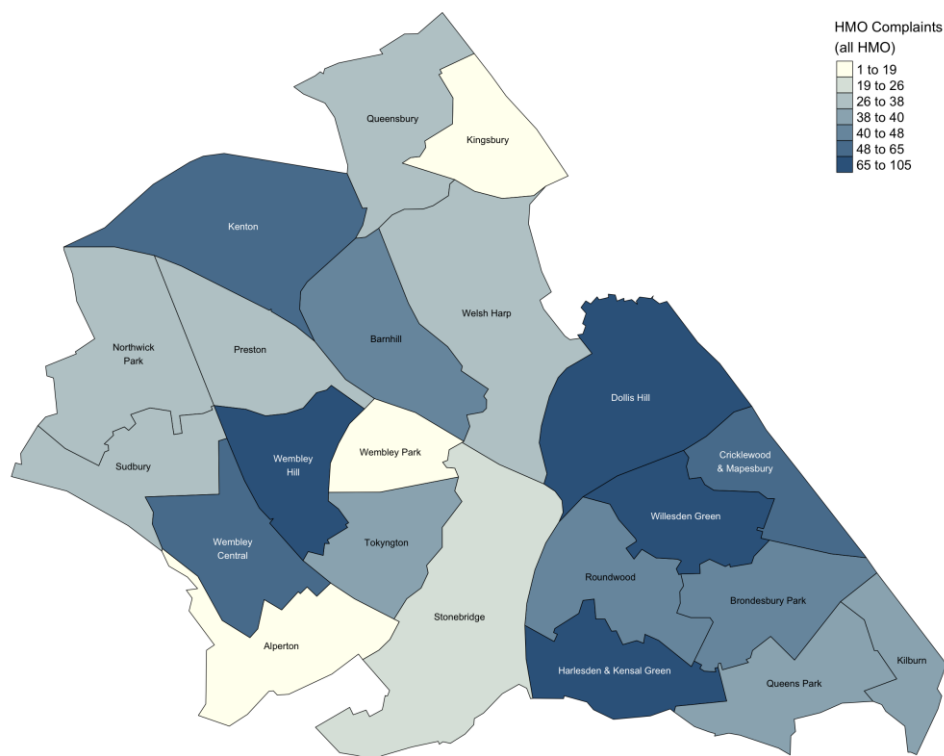


Figure 8. Number of HMO complaints (one or more) from tenants and others by ward (All HMOs, April 2019 – March 2024) (Source: Ti 2024).

Complaints are spread throughout the borough, with a slight bias towards the east (Map 6).



Map 6. Distribution of complaints (one or more) from tenants and others by ward at all HMOs (known and hidden, April 2019 – March 2024)

5.1.2 Mandatory HMOs

There were 441 complaints by tenants and others to Brent Council linked to Mandatory HMOs. Dollis Hill (66) has the highest number of complaints (Figure 9).

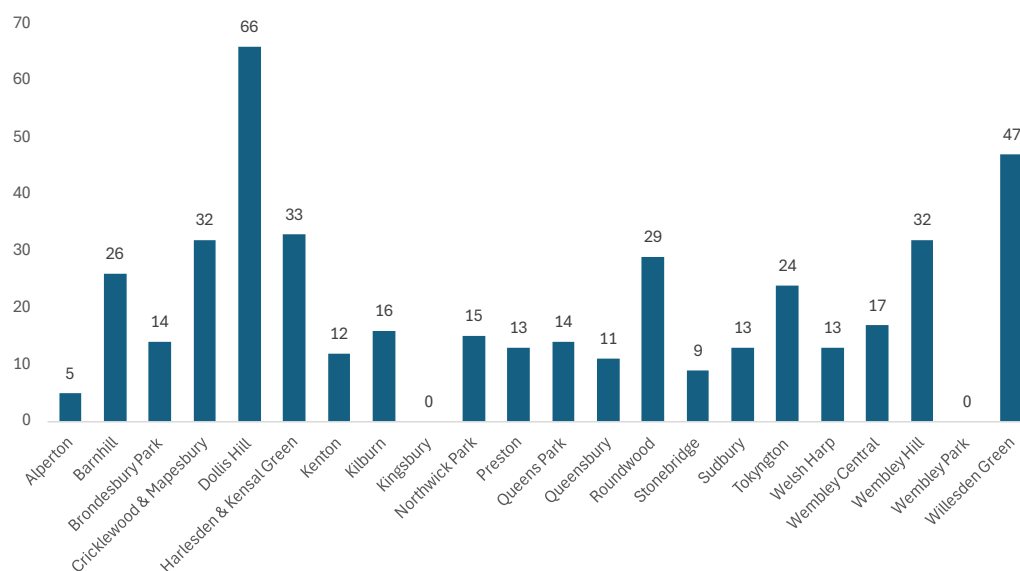
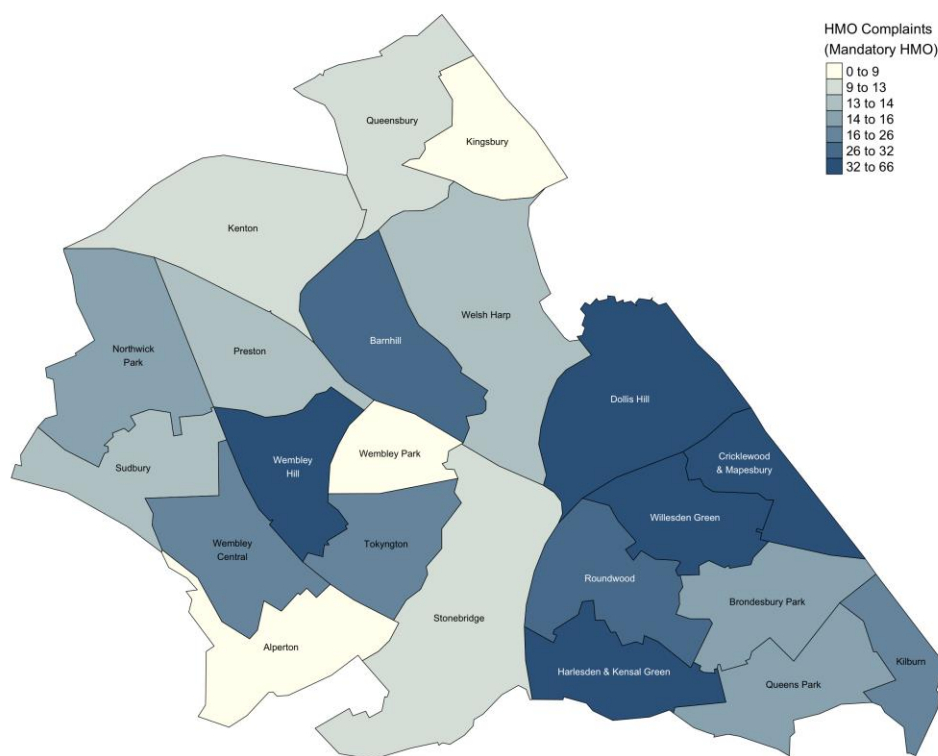


Figure 9. Number of complaints (one or more) at Mandatory HMOs from tenants and others by ward (April 2019 – March 2024) (Source: Ti 2024).

Complaints are distributed across the borough, with a bias towards the eastern wards (Map 7).



Map 7. Distribution of complaints (one or more) from tenants and others by ward at Mandatory HMOs (April 2019 – March 2024).

5.1.3 Additional HMOs

There were 157 complaints made by tenants and others to Brent Council linked to Additional HMOs (Figure 10). The highest number of complaints (21) were at Cricklewood and Mapesbury.

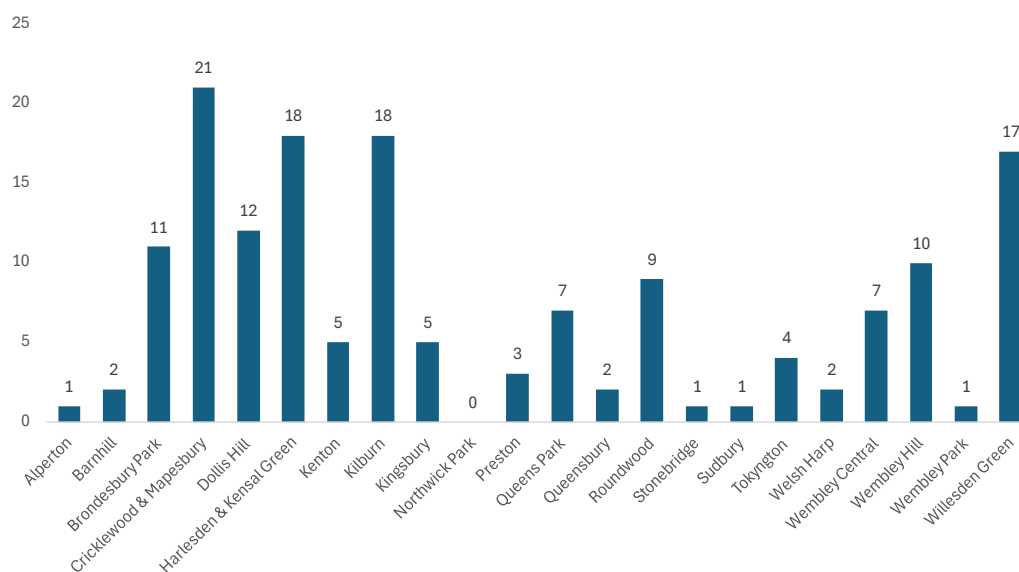
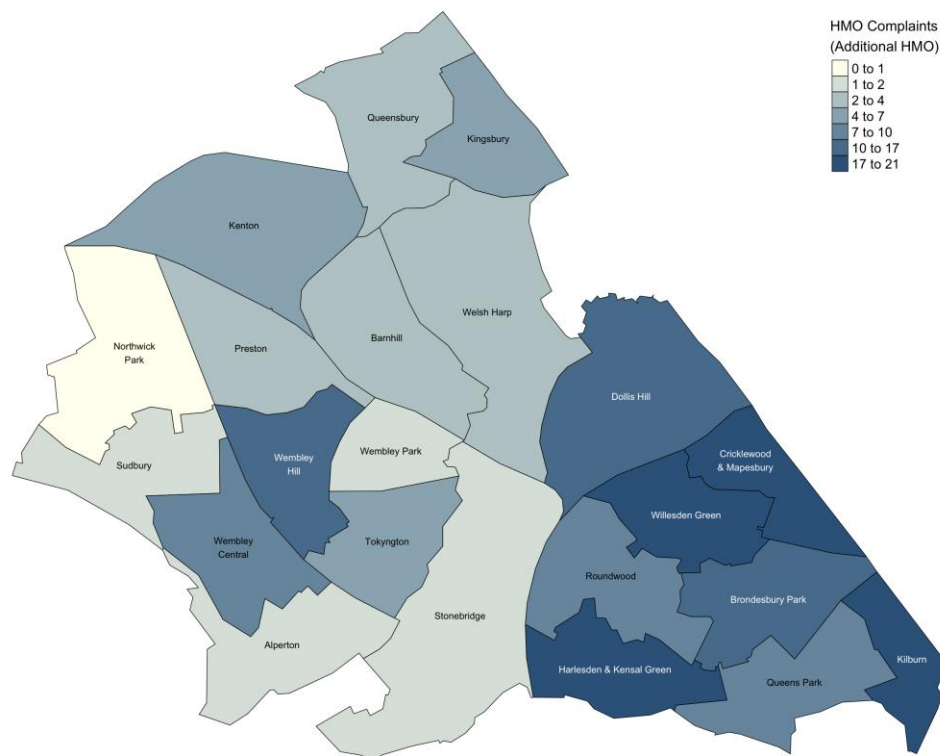


Figure 10. Number of HMO complaints (one or more) from tenants and others by ward linked to Additional HMOs (April 2019 – March 2024) (Source: Ti 2024).

Concentrations of complaints come predominantly from the eastern wards (Map 8).



Map 8. Distribution of HMO complaints (one or more) from tenants and others by ward linked to Additional HMOs (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

5.1.4 Predicted/Hidden HMOs

There were 304 HMO complaints made by tenants and others to the Council linked to Predicted/hidden HMOs. Wembley Central (34) has the highest number of complaints (Figure 11).

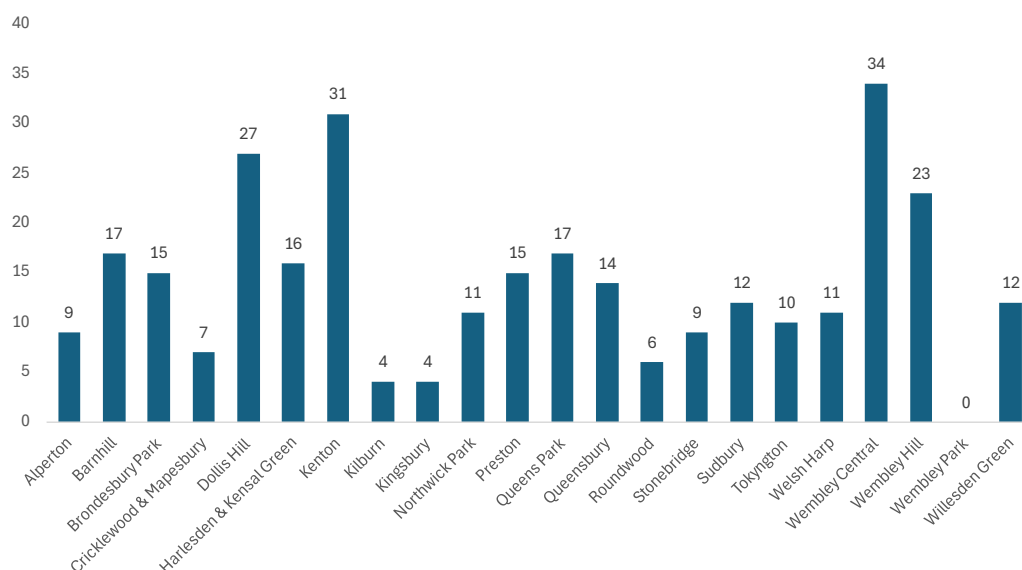
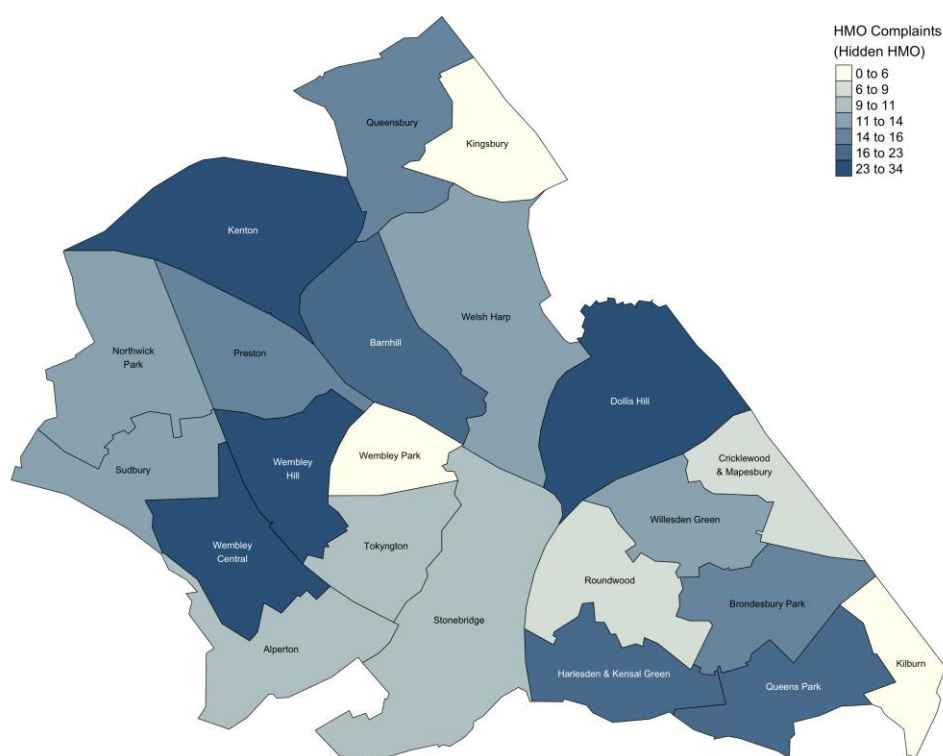


Figure 11. Number of HMO complaints (one or more) from tenants and others by ward linked to Predicted/hidden HMOs (April 2019 – March 2024) (Source: Ti 2024).

Complaints are distributed across the entire borough. Concentrations of complaints come predominantly from Wembley Central, Wembley Hill, Kenton, and Dollis Hill wards (Map 9).



Map 9. Distribution of HMO complaints (one or more) from tenants and others by ward at Predicted/hidden HMOs (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

5.2 Repeated Complaints

Properties with repeated complaints could indicate that HMO managers are failing to comply with licence conditions and HMO Management Regulations.

5.2.1 All HMOs

For the period April 2019 – March 2024 there were 166 repeated complaints at All HMOs (known and hidden). Dollis Hill (23) had the highest number (Figure 12).

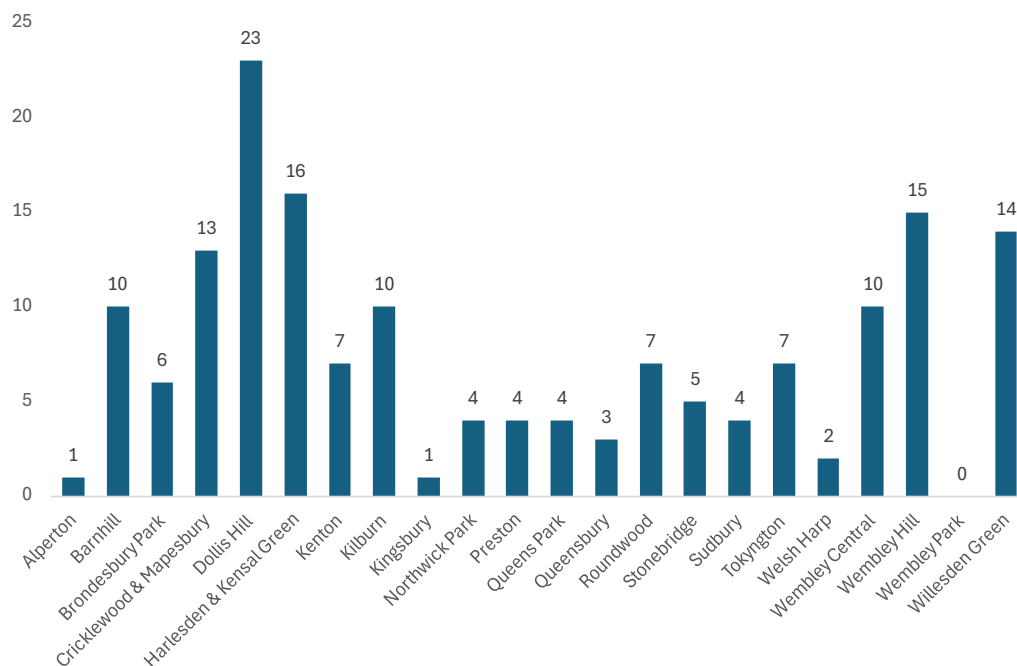
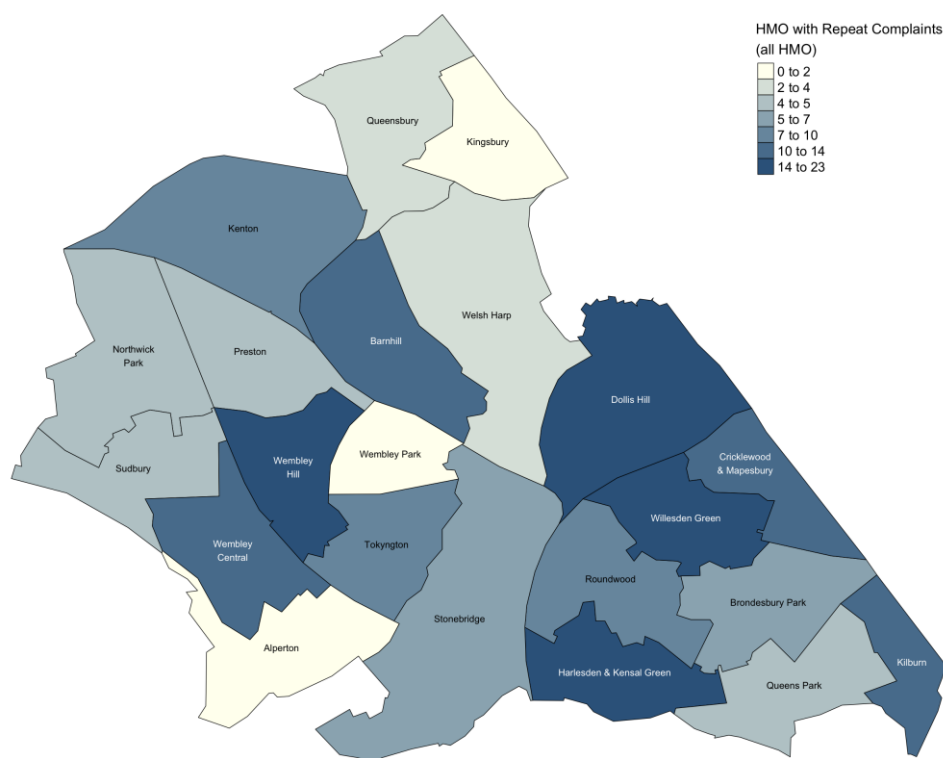


Figure 12. Number of repeated complaints from tenants and others at All HMOs (known and hidden) by ward (April 2019 – March 2024) (Source: Ti 2024).

Repeated complaints were received across Brent, with a slight bias towards the eastern wards (Map 10).



Map 10. Distribution of repeated complaints from tenants and others at All HMOs (known and hidden) by ward (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

5.2.2 Mandatory HMOs

For the period April 2019 – March 2024 there were 84 repeated complaints at Mandatory HMOs. Dollis Hill (14) had the highest number (Figure 13).

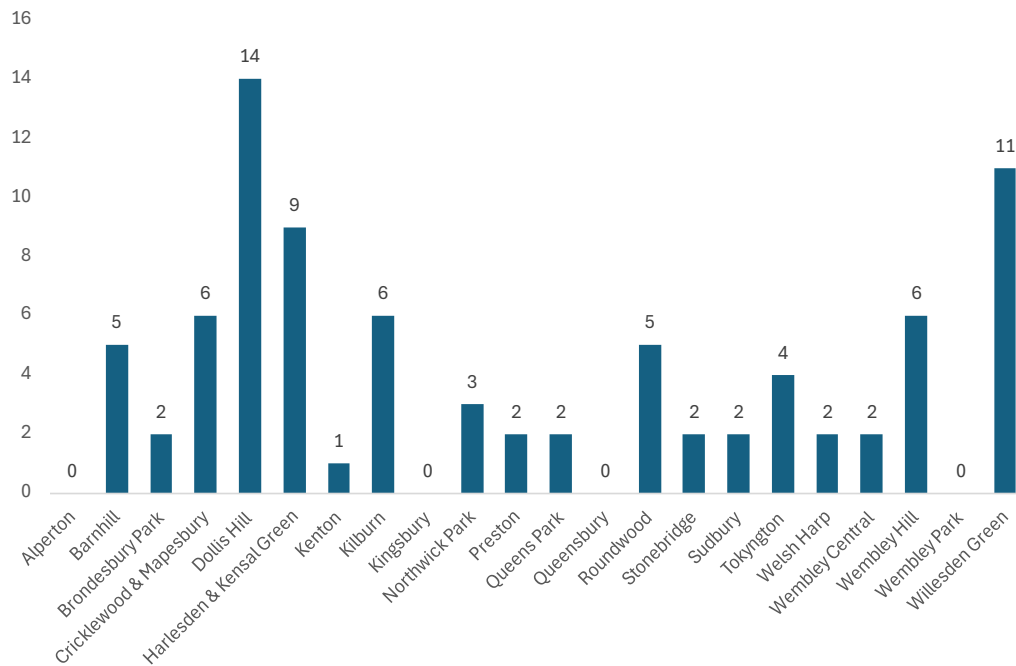
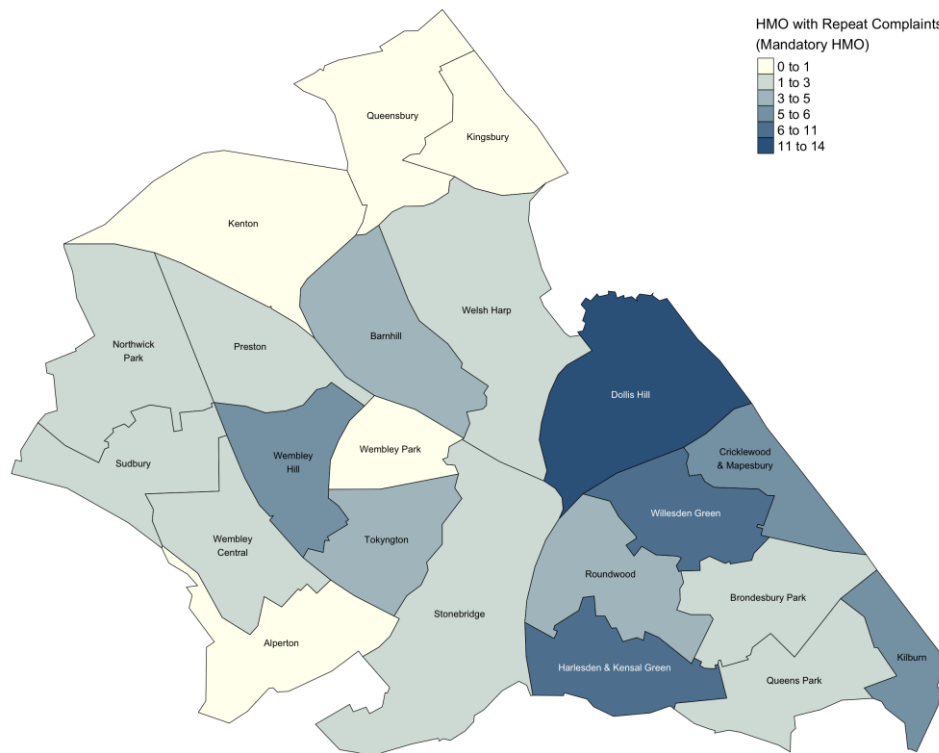


Figure 13. Number of repeated complaints from tenants and others at Mandatory HMOs by ward (April 2019 – March 2024) (Source: Ti 2024).

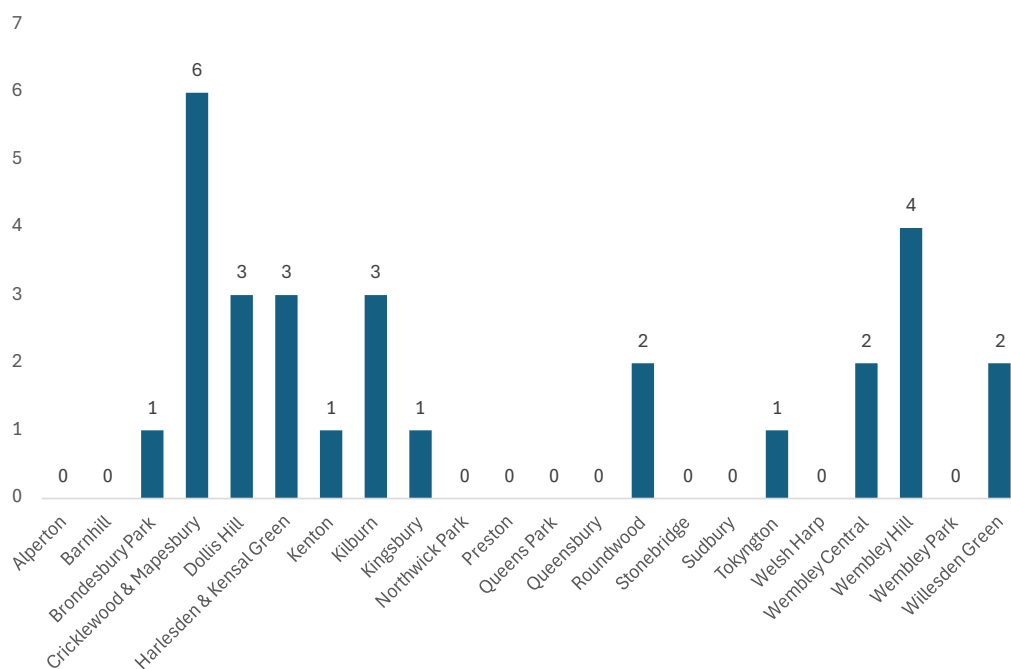
Repeated complaints at Mandatory HMOs were widespread in Brent, with a bias towards the eastern wards (Map 11).



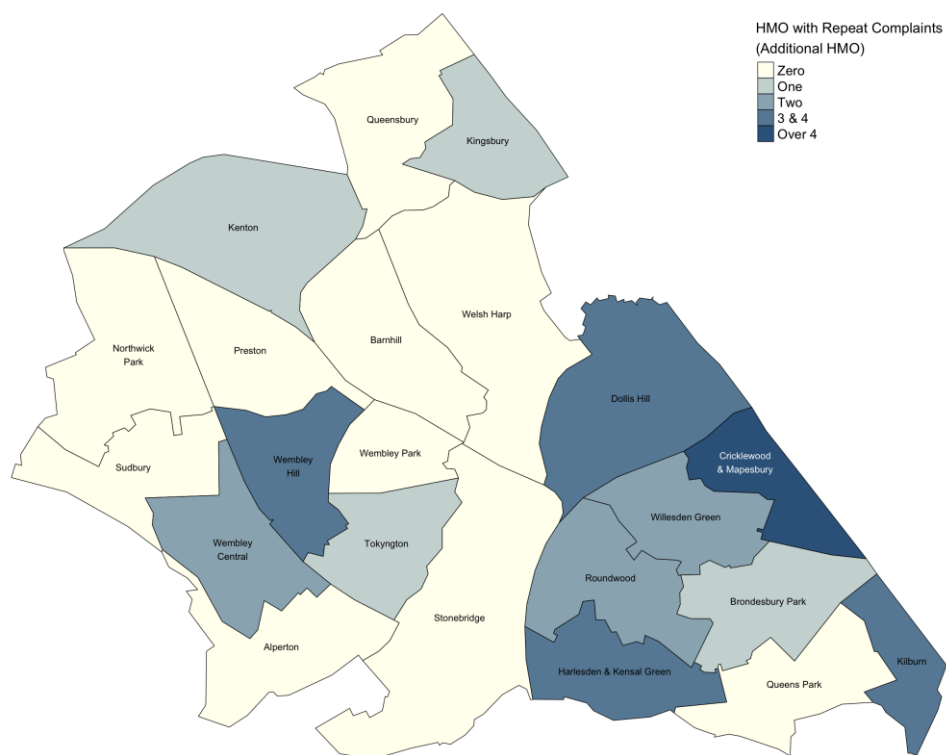
Map 11. Distribution of repeated complaints from tenants and others at Mandatory HMOs by ward (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

5.2.3 Additional HMOs

For the period April 2019 – March 2024 there were 29 repeated complaints at Additional HMOs. Cricklewood & Mapesbury (6) had the highest number (Figure 14).



Repeated complaints at Additional HMO were generally from the eastern wards (Map 12).



5.2.4 Predicted/hidden HMOs

For the period April 2019 – March 2024 there were 53 repeated complaints at Predicted/hidden HMOs. Wembley Central (6) and Dollis Hill (6) had the highest number (Figure 15).

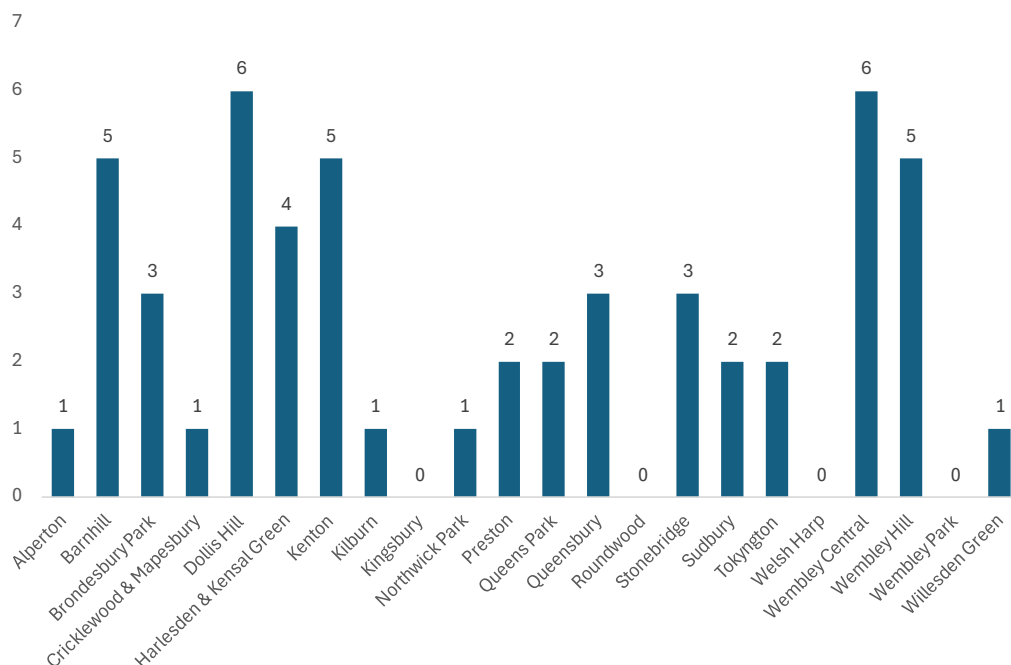
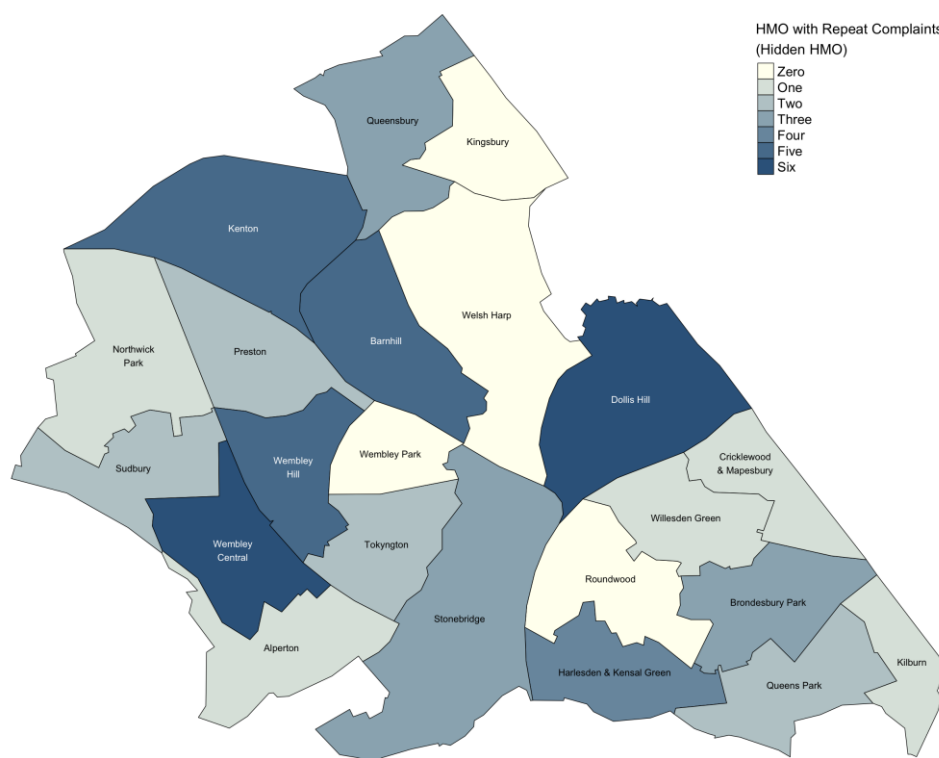


Figure 15. Number of repeated complaints from tenants and others at Predicted/hidden HMOs by ward (April 2019 – March 2024) (Source: Ti 2024).

Repeated complaints at Predicted/hidden HMOs were widespread throughout Brent (Map 13). Although Dollis Hill (6) had the highest, there are other wards across Brent with similar numbers.



Map 13. Distribution of repeated complaints from tenants and others at Predicted/hidden HMOs by ward (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

5.2.5 Summary

Overall, there were 902 complaints, and 166 repeated complaints. Mandatory HMOs had the most (441 & 81), with Predicted/hidden HMOs not far behind (304, 53) (Figure 16).

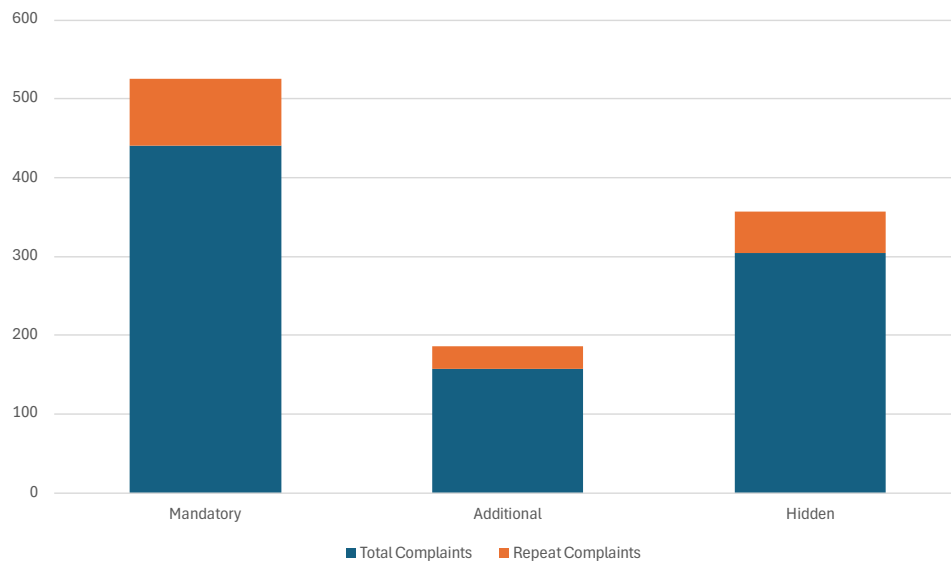


Figure 16. Number of complaints from tenants and others at HMOs April 2019 – March 2024 (Source Ti 2024).

Although the absolute numbers of complaints and repeat complaints varied between HMO types (Figure 16), the proportion of all complaints that were repeated was remarkably consistent (Figure 17). For the different HMO types the values are all around 18%, i.e. 18% of all complaints are from HMOs where there have been previous complaints.

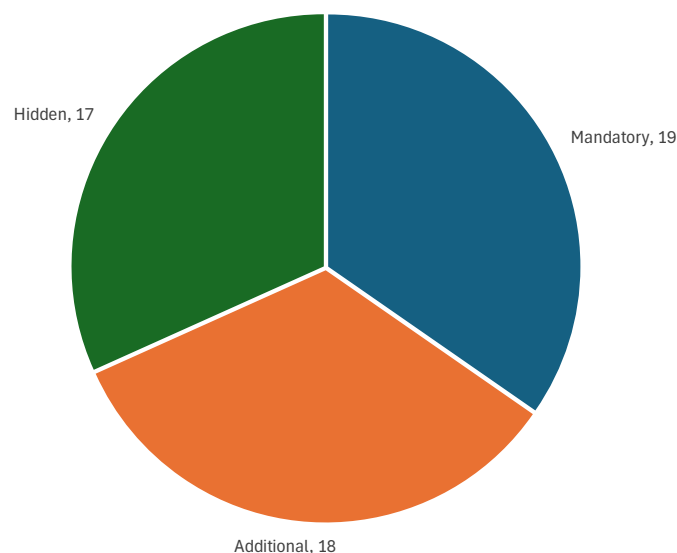


Figure 17. Percentage of all complaints that were repeated complaints, for HMO types April 2019 – March 2024 (Source Ti 2024).

5.3 Predicted HMO hazards

The Housing Health and Safety Rating System (HHSRS) is a system for assessing housing conditions. A hazard is any risk of harm to the health or safety of an actual or potential occupier of accommodation that arises from a deficiency in the dwelling, building or land in the vicinity.

Currently the HHSRS assessment identifies 29 hazard types that give rise to hazards, under 4 main public health categories; physiological requirements; psychological requirements; protection against infection; protection against accidents⁴. Serious hazards (Category 1 & 2, HHSRS) hazards have a physiological or psychological impact on the occupant and may result in medical treatment⁵.

In 2023, 12% of private rented dwellings in England had at least one Category 1 hazard; this was a higher proportion than the average for the total housing stock (8%), and significantly higher than owner occupied dwellings (9%) or social rented dwellings (4%). Furthermore, the private rented sector had the highest proportion of non-decent homes (21%)⁶.

Using a sample of properties that are known to have at least one serious housing hazard (see above), it is possible to predict the number of HMO properties with at least one serious hazard (Category 1 and/or high scoring Category 2 hazards, HHSRS A-D) across the HMO population (known and predicted hidden) (Figure 17). Further details of the methodology can be found in Appendix 2.

5.3.1 All HMOs

There are 1,955 HMO (known and Predicted/hidden) properties in Brent that are likely to have at least 1 serious housing hazard (Category 1 and/or high scoring Category 2 hazards, HHSRS). Dollis Hill (191) has the greatest number, whilst Wembley Park (3) has the fewest (Figure 18). This represents 27% of the known and Predicted/hidden HMO population, more than double the PRS national average (12%)⁷.

⁴ HHSRS) operating guidance, <https://www.gov.uk/government/publications/hhsrs-operating-guidance-housing-act-2004-guidance-about-inspections-and-assessment-of-hazards-given-under-section-9>

⁵ Housing Health and Rating System, Operation Guidance, 2006, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/15810/142631.pdf

⁶ EHS Headline 2022-2023, <https://www.gov.uk/government/statistics/chapters-for-english-housing-survey-2022-to-2023-headline-report>

⁷ EHS Headline 2022-2023, <https://www.gov.uk/government/statistics/chapters-for-english-housing-survey-2022-to-2023-headline-report>

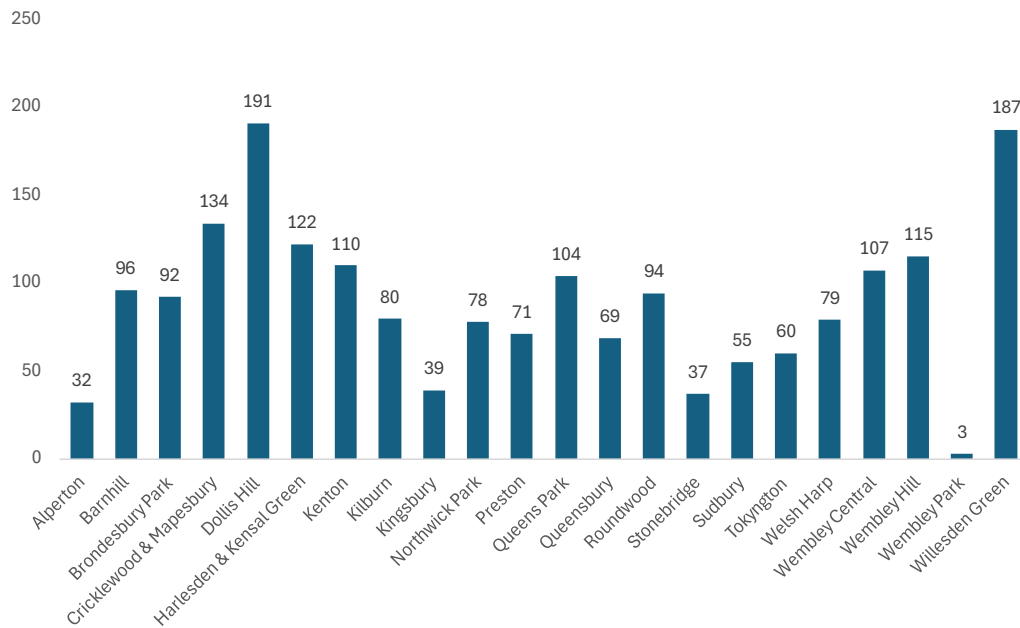
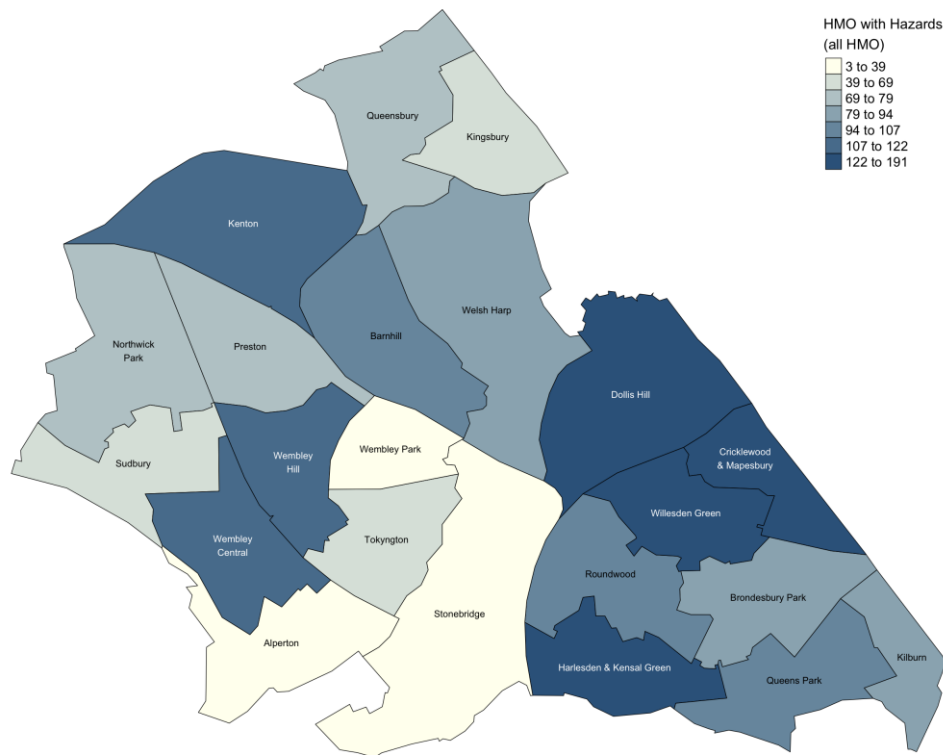


Figure 18. HMOs (shared amenities, known and hidden) with one or more predicted serious hazards (Category 1 and/or high scoring Category 2 hazards, HHSRS) by ward (Source: Ti 2024).

HMO properties (known and hidden) with predicted serious hazards are spread throughout the borough of Brent, although there is a bias towards the eastern wards (Map 14).



Map 14. Distribution of All HMOs with one or more predicted serious hazards (Category 1 and/or high scoring Category 2 hazards, HHSRS) by ward (Source: Ti 2024, Map by Metastreet).

5.3.2 Additional HMOs

There are 255 Additional HMOs properties in Brent that are likely to have at least 1 serious housing hazard (Category 1 and/or high scoring Category 2 hazards, HHSRS). Willesden Green (50) has the highest number of predicted hazards, whilst Alperton (1) has the lowest (Figure 19).

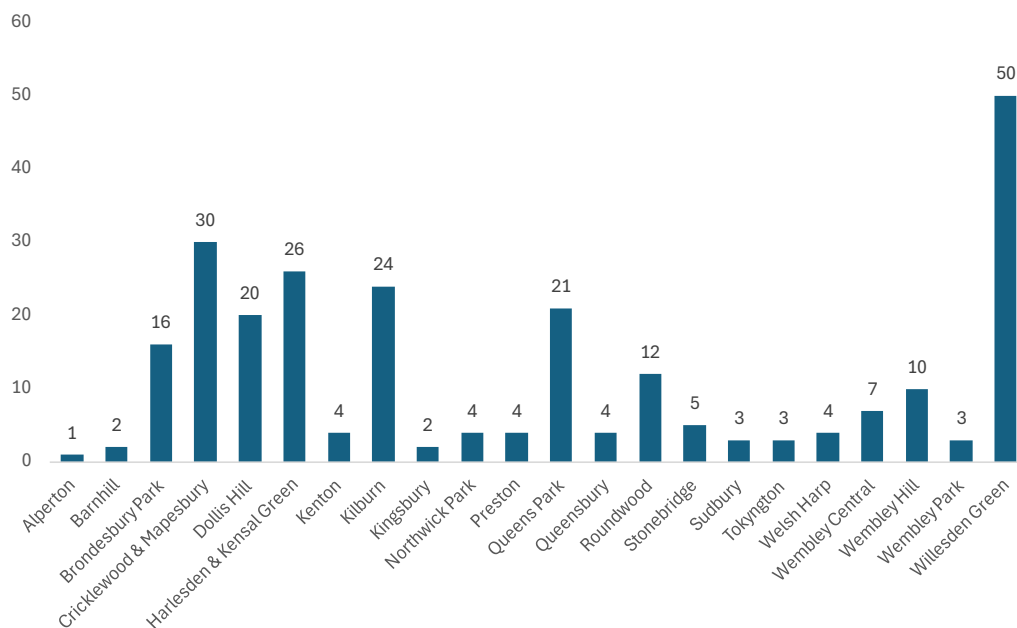
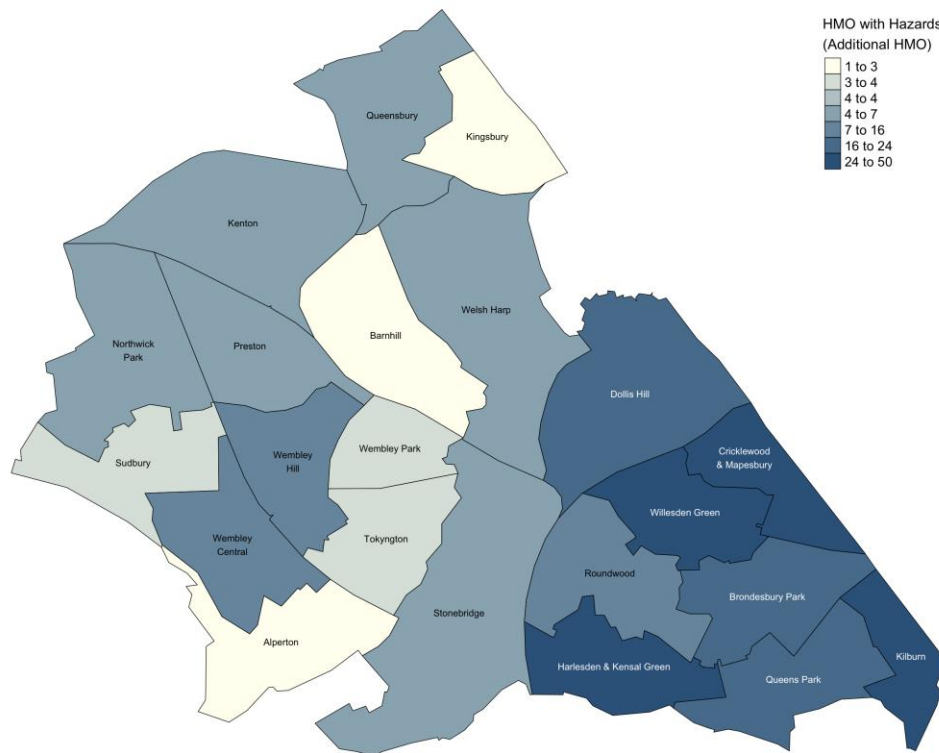


Figure 19. Additional HMOs with one or more predicted serious hazards (Category 1 and/or high scoring Category 2 hazards, HHSRS) by ward (Source: Ti 2024).

Concentrations of properties with serious hazards can be found predominantly in the southern and eastern wards (Map 15).



Map 15. Distribution of Additional HMOs with one or more predicted serious hazards (Category 1 and/or high scoring Category 2 hazards, HHSRS) by ward (Source: Ti 2024, Map by Metastreet)

5.3.3 Mandatory HMOs

Mandatory HMOs with serious hazards (784) are distributed across the whole borough (Figure 20). New Willesden Green (98) and Dollis Hill (97) have the highest number of predicted hazards.

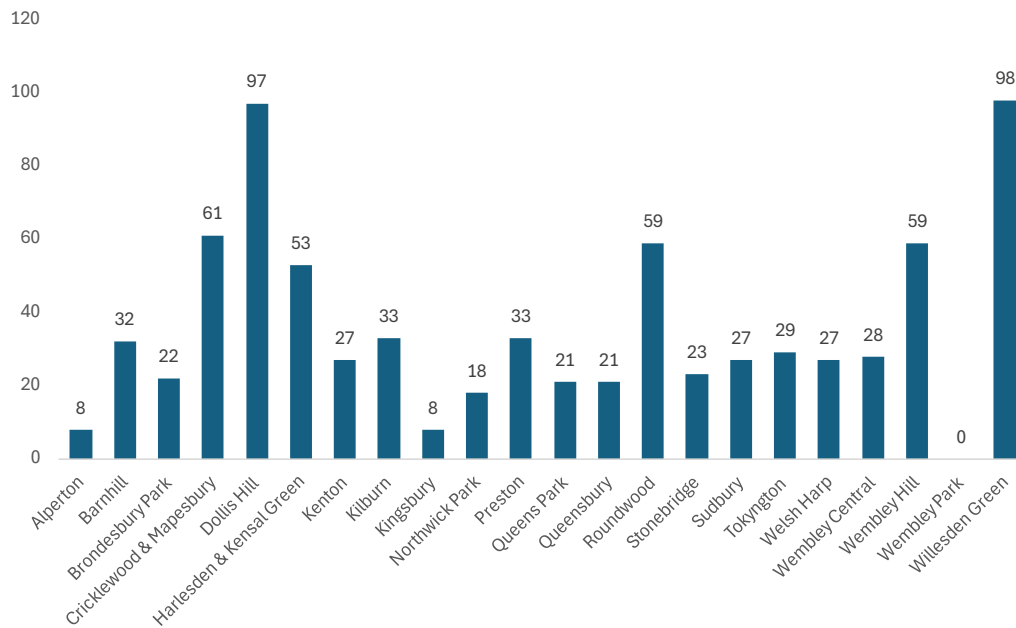
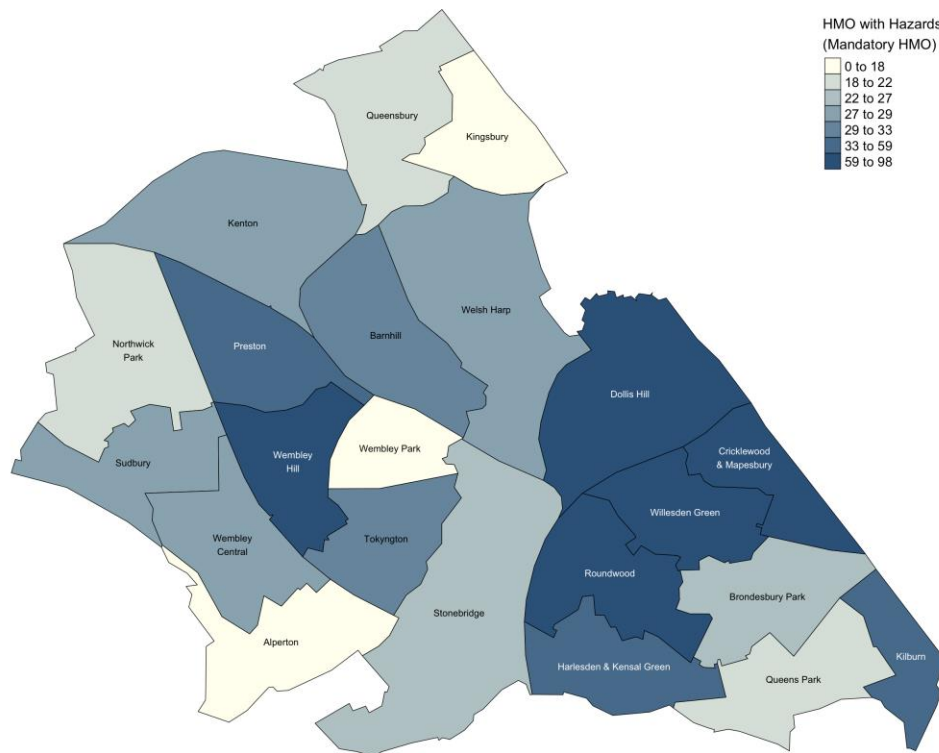


Figure 20. Mandatory HMOs with one or more predicted serious hazards predicted (Category 1 and/or high scoring Category 2 hazards, HHSRS) by ward (Source: Ti 2024).

As with other types of HMO, concentrations of properties with serious hazards can be found predominantly in the southern and eastern wards (Map 16).



Map 16. Distribution of Mandatory HMOs with one or more predicted serious hazards (Category 1 and/or high scoring Category 2 hazards, HHSRS) by ward (Source: Ti 2024, Map by Metastreet).

5.3.4 Predicted/hidden HMOs

Predicted/hidden HMOs with serious hazards (916) are distributed across the whole borough. Kanton (79) and Dollis Hill (74) wards have the highest number of Predicted/hidden HMOs with predicted serious hazards (Figure 21).

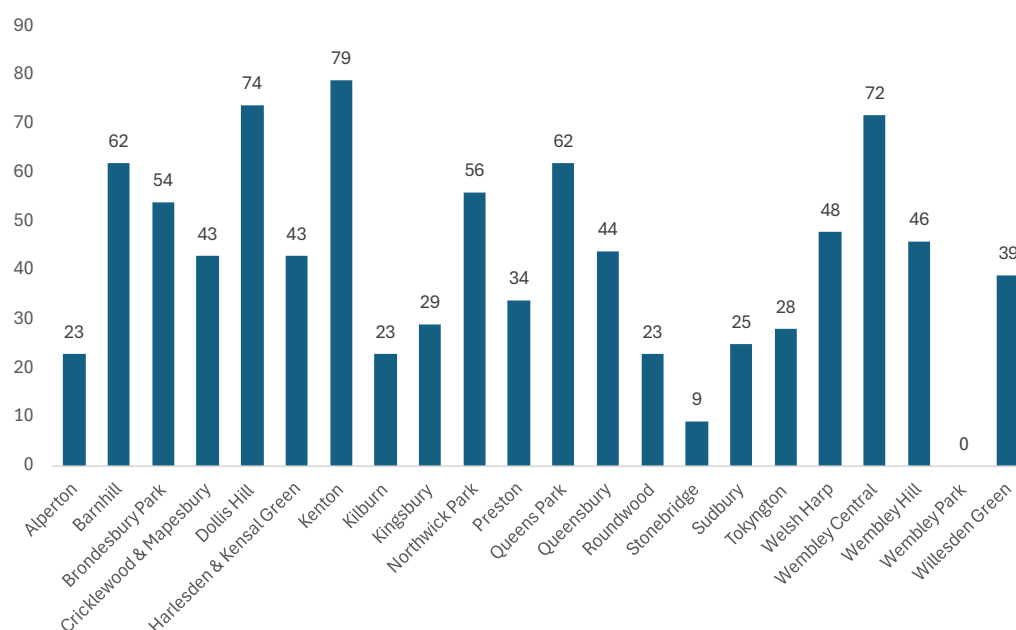
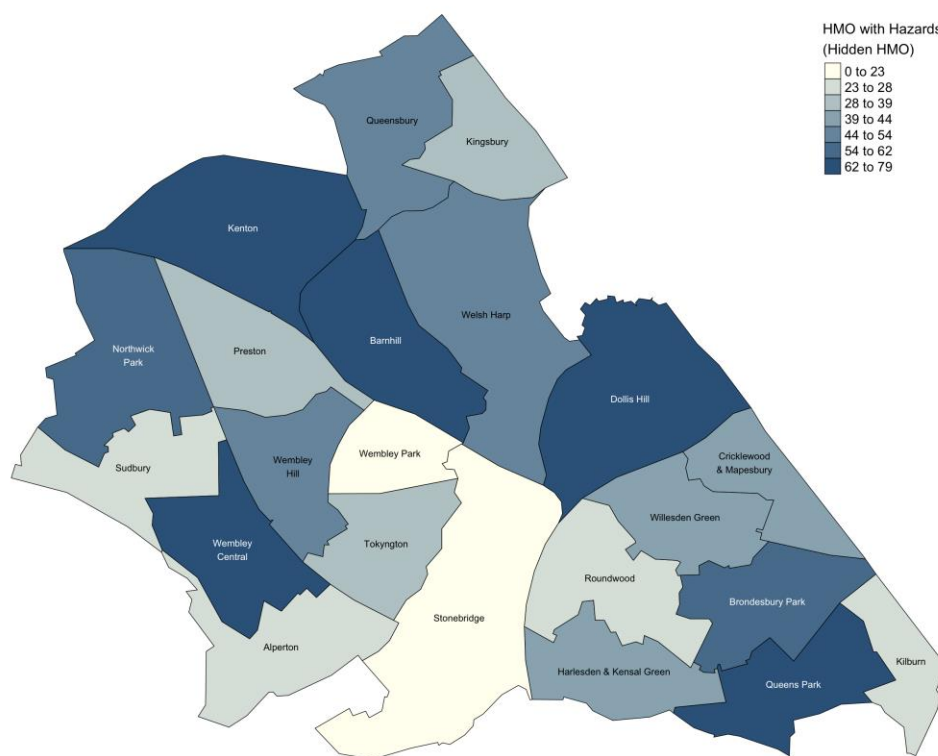


Figure 21. Predicted/hidden HMOs with one or more predicted serious hazards (Category 1 and/or high scoring Category 2 hazards, HHSRS) by ward (Source: Ti 2024).

Concentrations of Predicted/hidden HMO properties with serious hazards can be found throughout Brent, with hot spots in Queens Park, Dollis Hill, Kenton, Barnhill, and Wembley Central (Map 17).



Map 17. Distribution of Predicted/hidden HMOs with one or more predicted serious hazards (Category 1 and/or high scoring Category 2 hazards, HHSRS) by ward (Source: Ti 2024, Map by Metastreet).

5.4 Energy performance

An EPC rating is an assessment of a property's energy efficiency. It is primarily used by buyers or renters of residential properties to assess the energy costs associated with heating a house or flat. The rating is from A to G. A indicates a highly efficient property, G indicates low efficiency.

The energy efficiency of a dwelling depends on the thermal insulation of the structure, on the fuel type, and the size and design of the means of heating and ventilation. Any disrepair or dampness to the dwelling and any disrepair to the heating system may affect efficiency. The exposure and orientation of the dwelling are also relevant.

As part of this study, 3,620 EPC ratings were matched to known HMO properties (Figure 22). All figures have been modelled from this group. The housing stock is dominated by EPC ratings C & D, with B & E ratings less so. The A, F & G ratings are the least common.

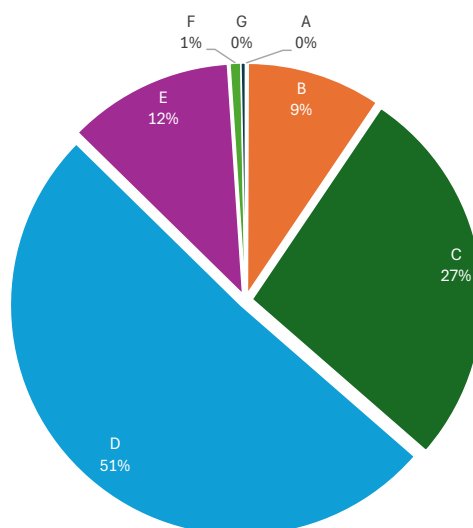


Figure 22. EPC rating distribution for HMOs (A-G) (Source: Ti 2024).

The EPC ratings are distributed around the D rating (51%), with progressively smaller contributions towards the lower and upper ends (Figure 23).

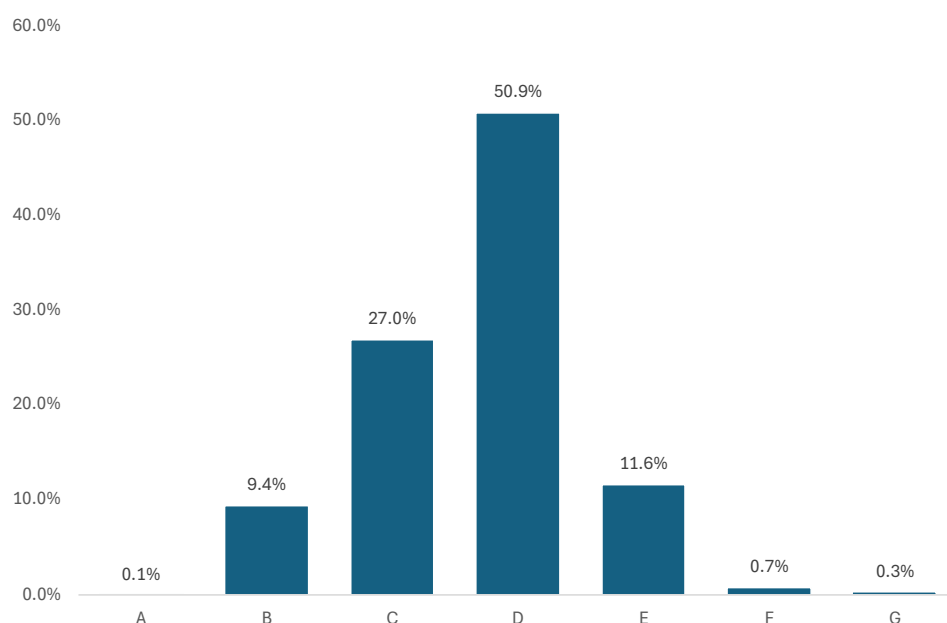


Figure 23. EPC ratings across Brent for known HMOs, showing the percentage of properties in each band (Source Ti 2024).

Ratings by property type show that bungalows fall in the C—E categories (Figure 24). Flats, show a largely even spread, with some B ratings but also E—F ratings. Houses show a wide range across all ratings A—G. There are far more houses and flats than bungalows and maisonettes.

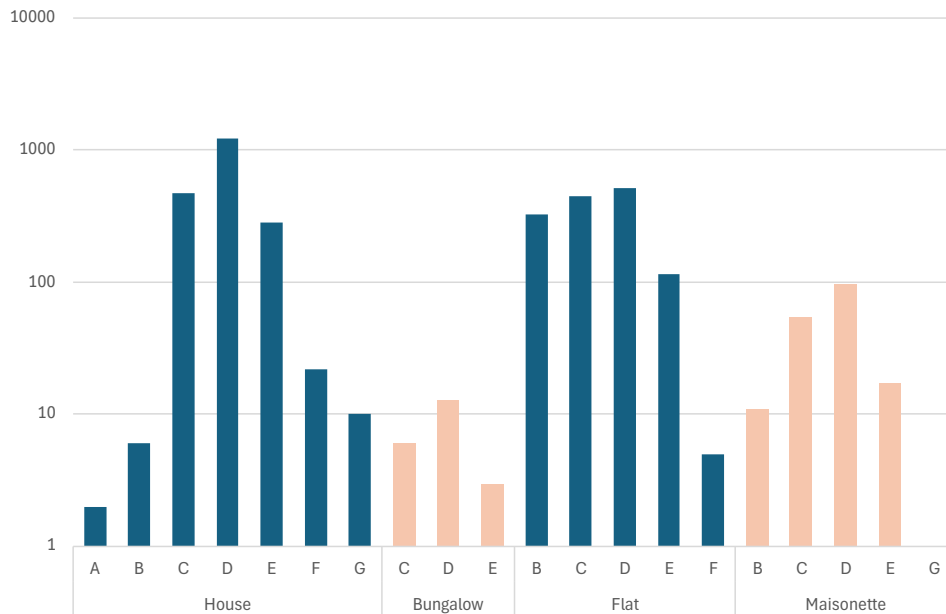


Figure 24. EPC ratings for known HMOs in Brent, split by property type (note that this is a logarithmic scale, Source Ti 2024).

Brent has 458 HMO EPC records that are E, F, & G rated (Figure 25). EPC ratings E, F, & G represent properties with the least energy efficiency. Willesden Green (76) and Cricklewood & Mapesbury (49) have the highest number of EPC ratings E-G (Figure 25).

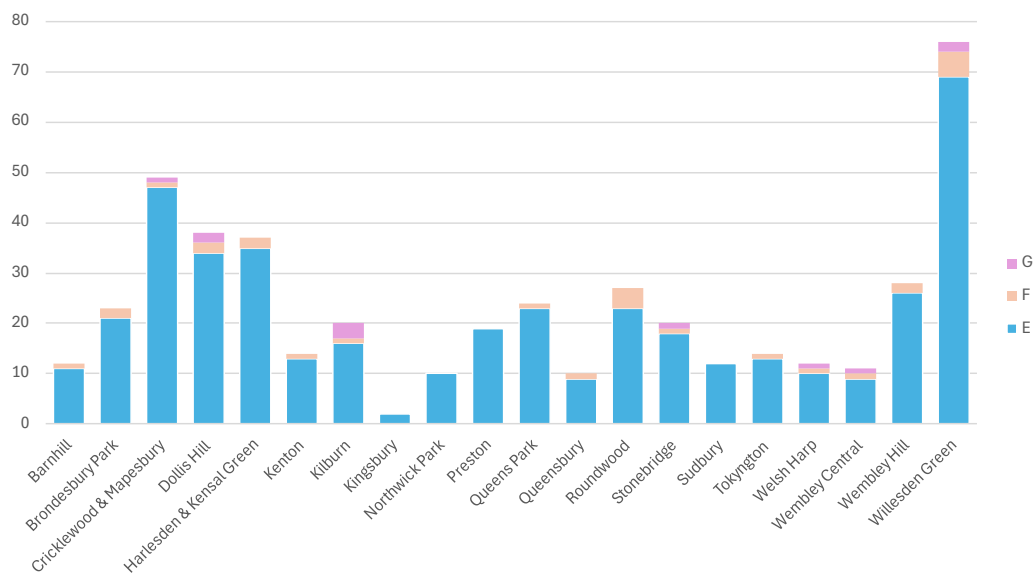


Figure 25. EPC rating (E-G) distribution for HMOs by ward (Source: Ti 2024).

The Minimum Energy Efficiency Standard (MEES) came into force in England and Wales on 1 April 2018. The regulation applies to PRS properties and mandates that all dwellings must have an EPC

rating of E and above to be compliant. It has been calculated using the matched addresses that 1.1% (102) of HMO properties (known and Predicted/hidden) in Brent have F and G rating. It is possible that these properties have been excluded from the MEES regulation requirements on technical grounds.

6 HMO Anti-Social Behaviour (ASB)

ASB incidents, recorded by the council over the period April 2019 – March 2024 have been linked to HMO properties and analysed. Understanding ASB emanating from HMOs (all types) helps support the development of strategic interventions. Different assessments of ASB were recorded:

- Number of HMOs with one or more ASB incidents.
- Total number of ASB incidents.
- Repeat ASB, i.e. number of HMO with 2 or more ASB incidents.

6.1 Number of HMO linked to ASB

The number of properties linked to ASB can inform as to how widespread anti-social behaviour is.

6.1.1 All HMOs

Across Brent 1,525 HMO properties (all types) have recorded ASB incidents. It is important to note, where incidents could not be matched directly at the property level with HMO, ASB incidents have been discarded from this study. For example, ASB incidents investigated on a street corner that cannot be directly linked to an HMO property have been excluded. Dollis Hill (157) has the highest number of HMOs with ASB incidents (Figure 26).

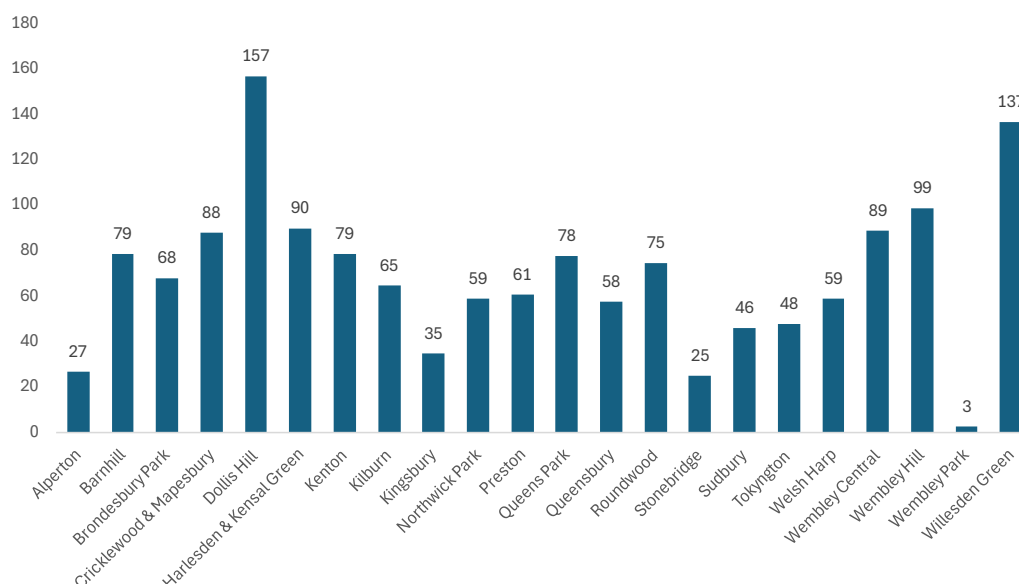
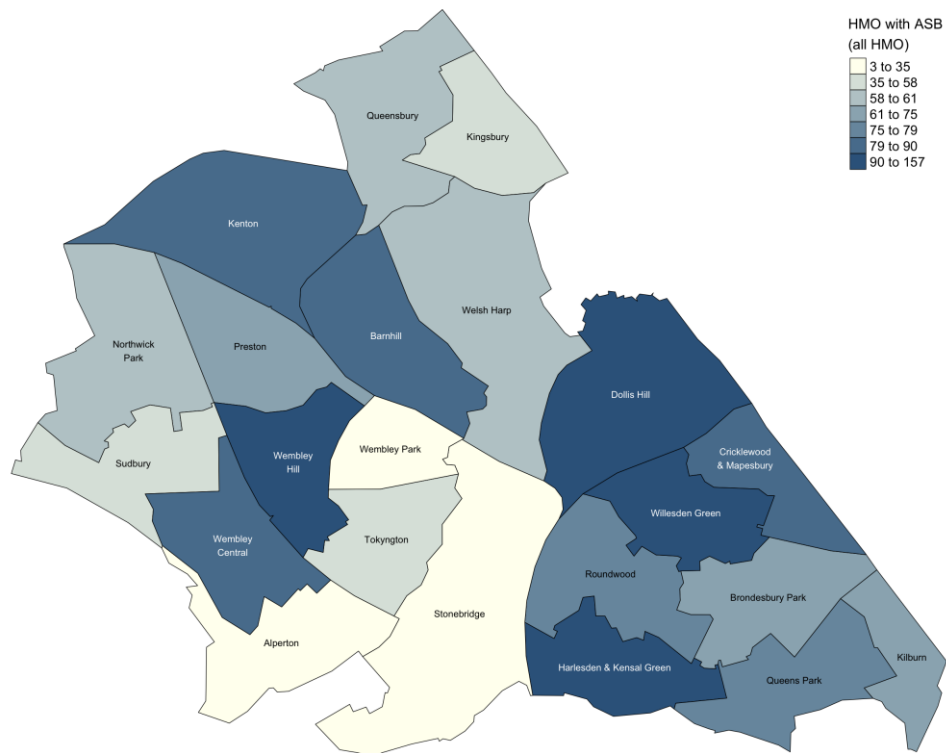


Figure 26. Number of HMOs (all types) with ASB incidents by ward (April 2019 – March 2024) (Source: Ti 2024).

HMOs where ASB incidents occur are widespread throughout Brent, with a bias towards some of the eastern wards (Map 18).



Map 18. Number of HMOs (all types) with ASB incidents by ward (April 2019 – March 2024) (Source: Ti 2024).

6.1.2 Additional HMOs

There were 206 Additional HMOs linked to ASB incidents in Brent (13.5%). Willesden Green (34) has the highest number of complaints (Figure 27).

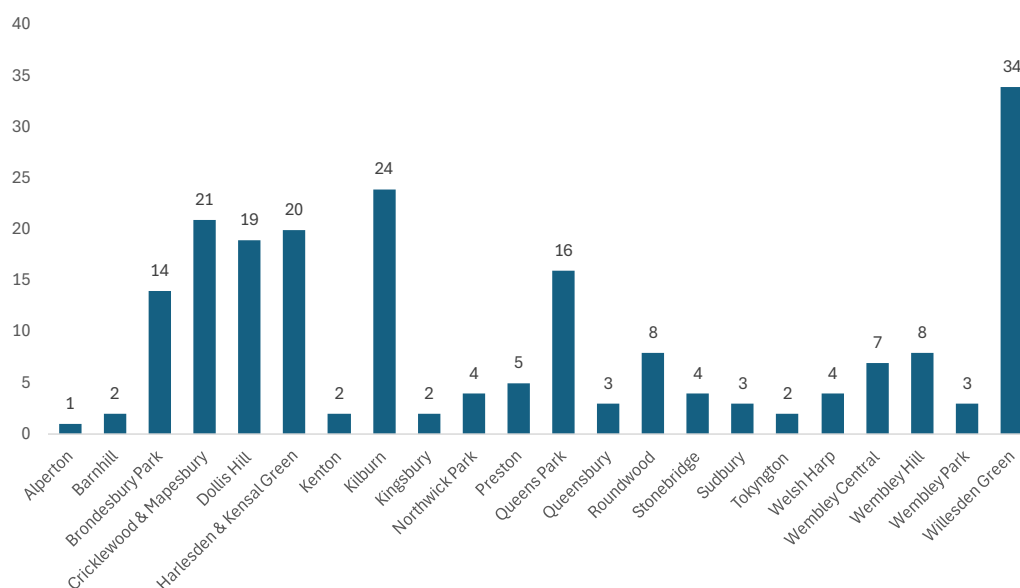
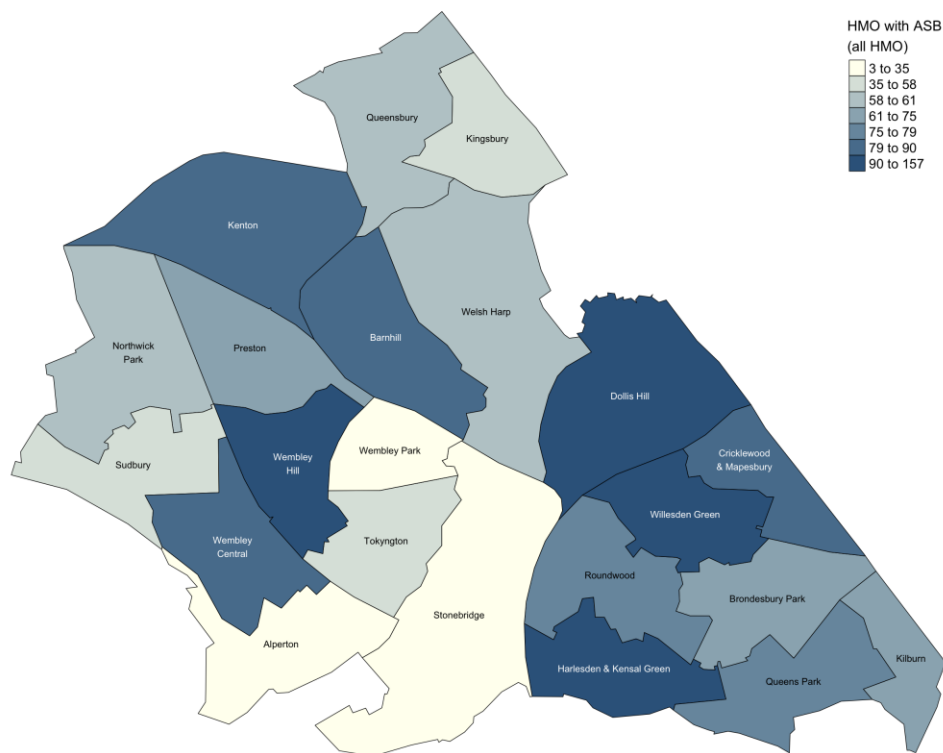


Figure 27. Number of Additional HMOs with ASB incidents by ward (April 2019 – March 2024) (Source: Ti 2024).

ASB incidents linked to Additional HMOs are distributed across most of the borough, with hotspots in certain areas such as Dollis Hill, Wembley Hill, Willesden Green, and Harlesden & Kensal Green (Map 19).



Map 19. Distribution of ASB linked to Additional HMOs by ward (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

6.1.3 Mandatory HMOs

There were 637 Mandatory HMOs linked to ASB incidents throughout Brent (41.8%). Willesden Green (82) and Dollis Hill (81) have the highest number of complaints (Figure 28).

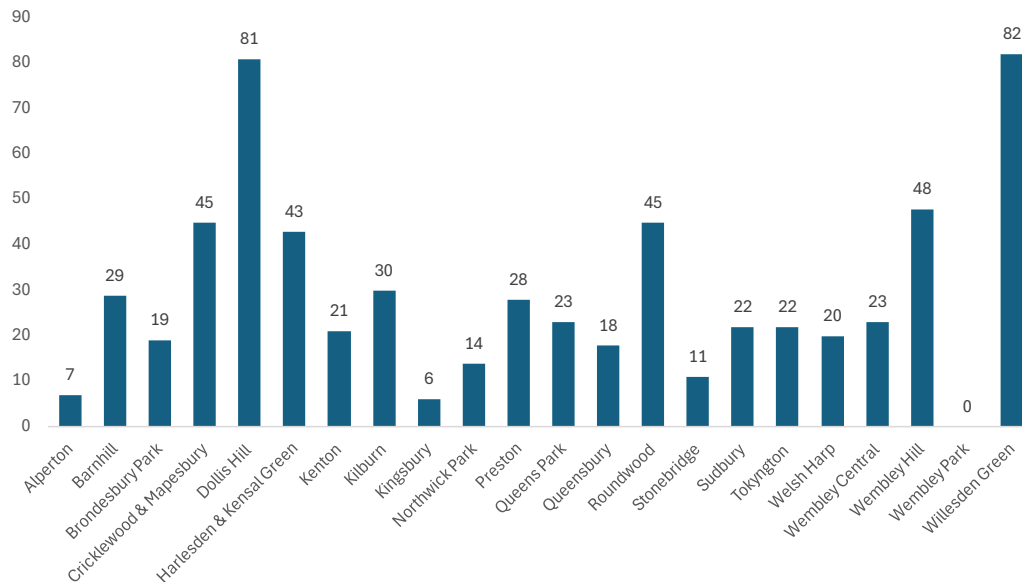
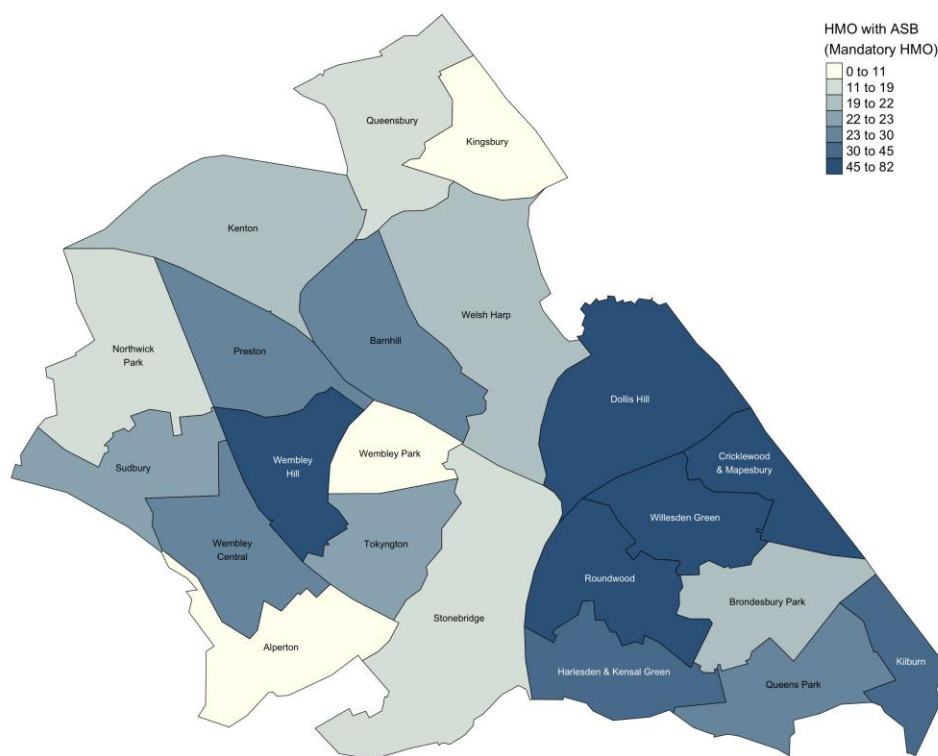


Figure 28. Number of Mandatory HMOs with ASB incidents by ward (April 2019 – March 2024) (Source: Ti 2024).

Most wards have ASB linked to HMOs (Wembley Park is an exception) with eastern wards having higher concentrations (Map 20).



Map 20. Distribution of ASB linked to Mandatory HMOs by ward (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

6.1.4 Predicted/Hidden HMOs

There were 682 Predicted/hidden HMOs linked to ASB incidents (44.7%). Wembley Central has the highest number of (hidden) HMOs with ASB incidents (59), with Dollis Hill (57) and Kanton (56) not far behind (Figure 29).

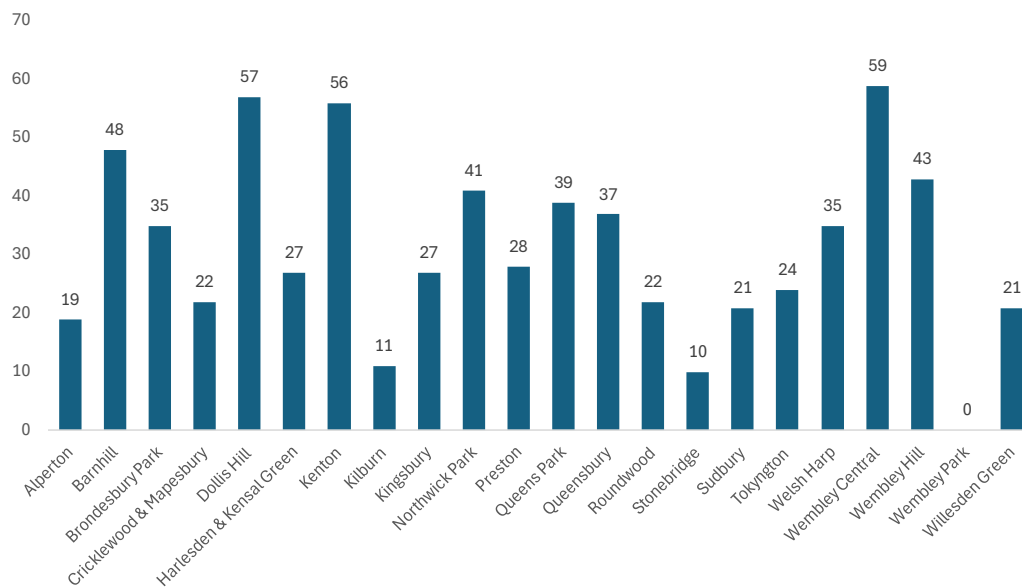
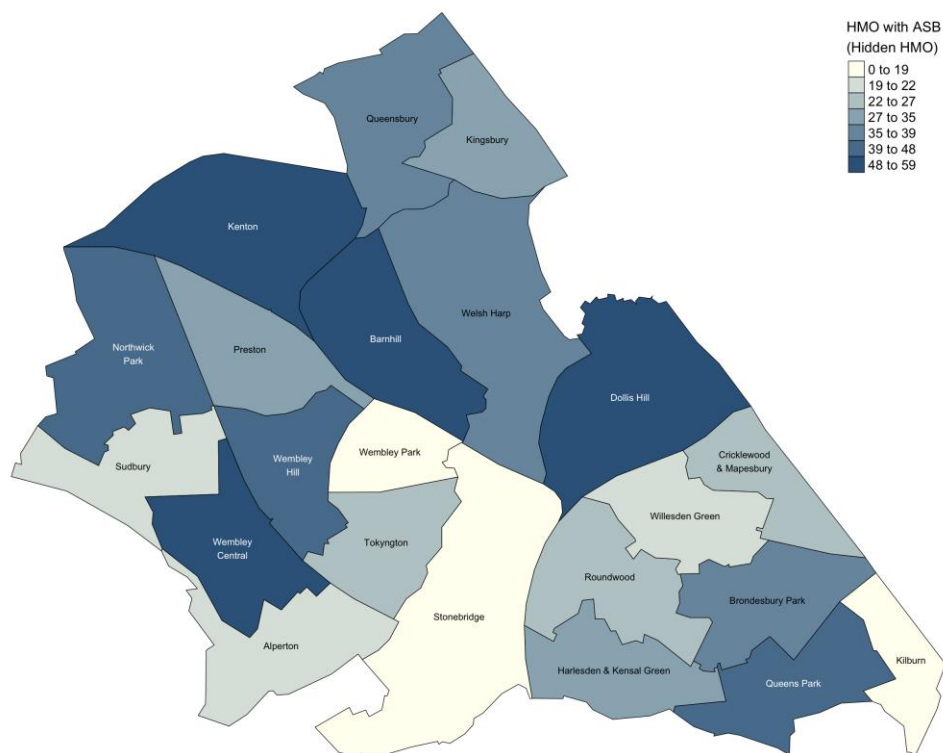


Figure 29. Number of Predicted/hidden HMOs with ASB incidents by ward (April 2019 – March 2024) (Source: Ti 2024).

All wards (except Wembley Park) have ASB linked to Predicted/hidden HMOs (Map 21). There is a slight bias towards the northern wards.



Map 21. Distribution of ASB linked to Predicted/hidden HMOs by ward (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

6.2 Total ASB incidents

The total number of ASB incidents includes properties where there were multiple incidents. As such the data show the levels of anti-social behaviour across the borough and at different kinds of HMO property.

6.2.1 All HMOs

Overall, there were 2,366 ASB incidents linked to all HMOs. The most (229) were from Dollis Hill (Figure 30).

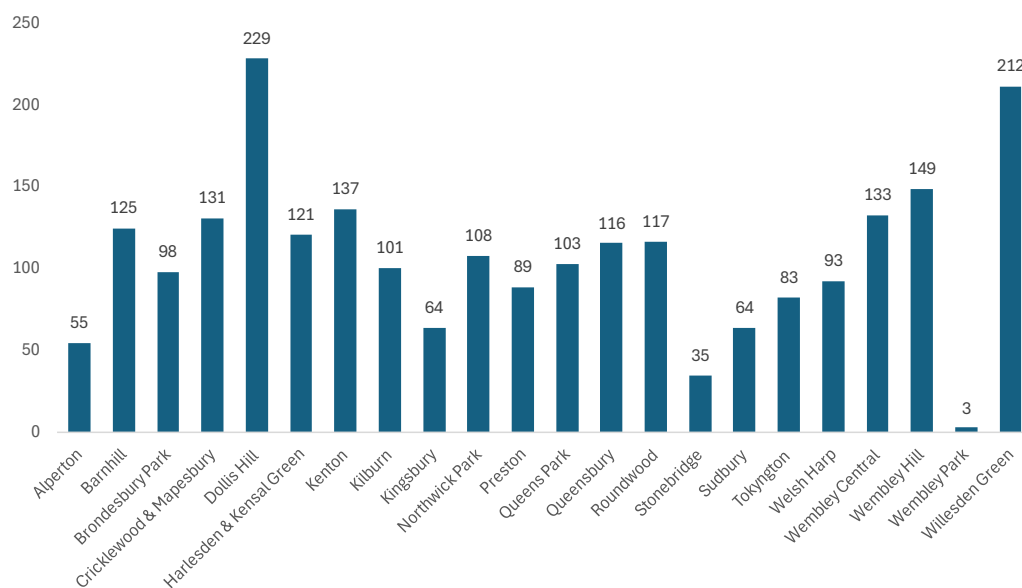
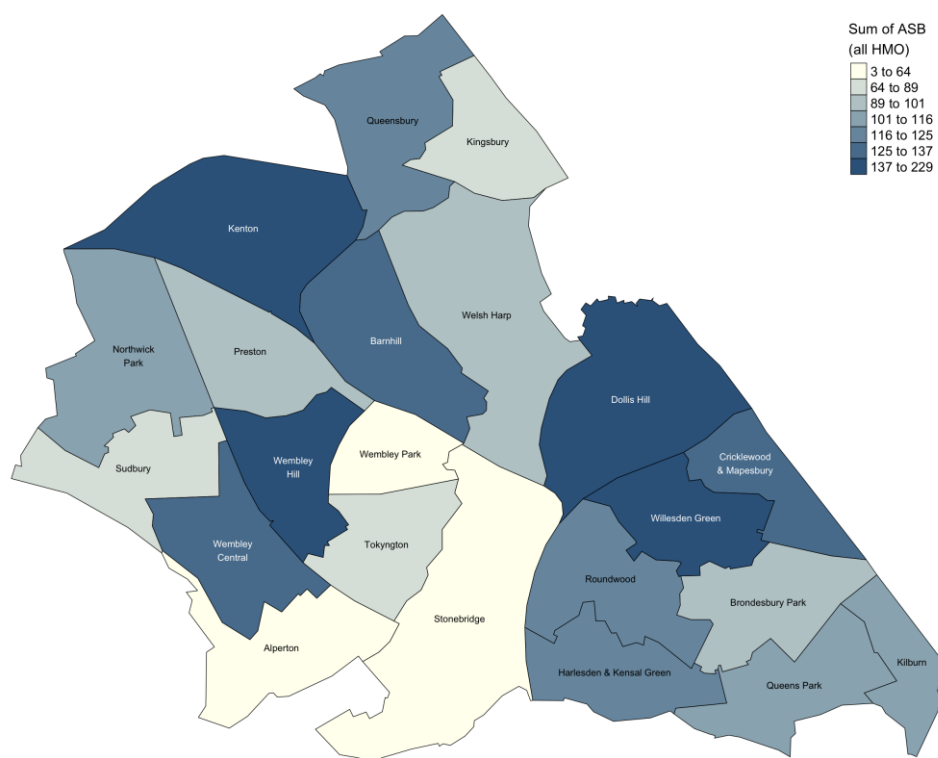


Figure 30. Total number of ASB incidents linked to All HMOs (April 2019 – March 2024)
(Source: Ti 2024).

ASB incidents are widespread throughout Brent (Map 22). There are hot spots in the east (Dollis Hill, Willesden Green), north (Kenton), and Wembley Hill ward.



Map 22. Distribution of total number of ASB incidents linked to All HMOs (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

6.2.2 Additional HMOs

Of the total ASB incidents 274 (11.6%) were linked to Additional HMOs. Willesden Green had the highest (45) total number of ASB incidents (Figure 31).

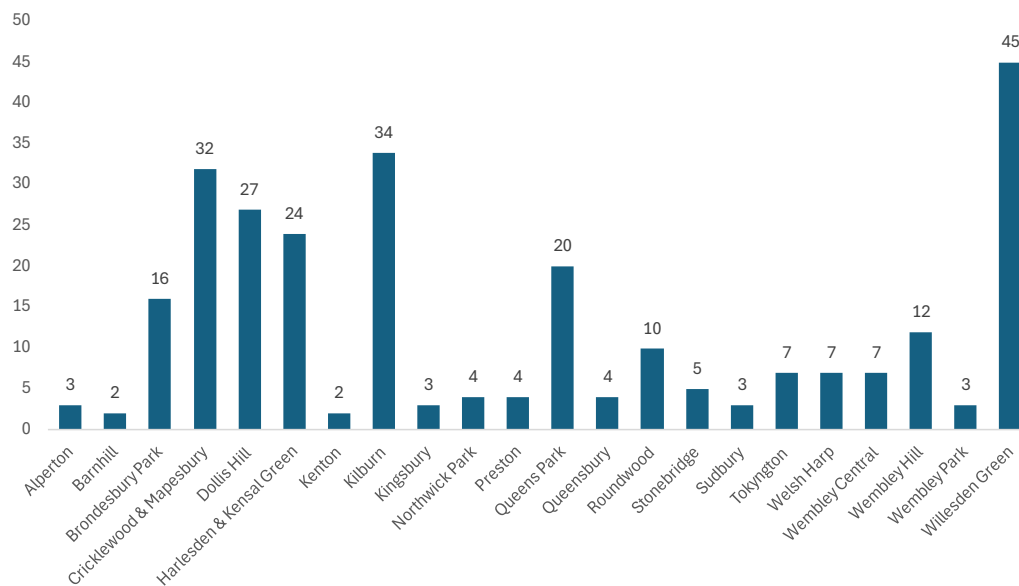
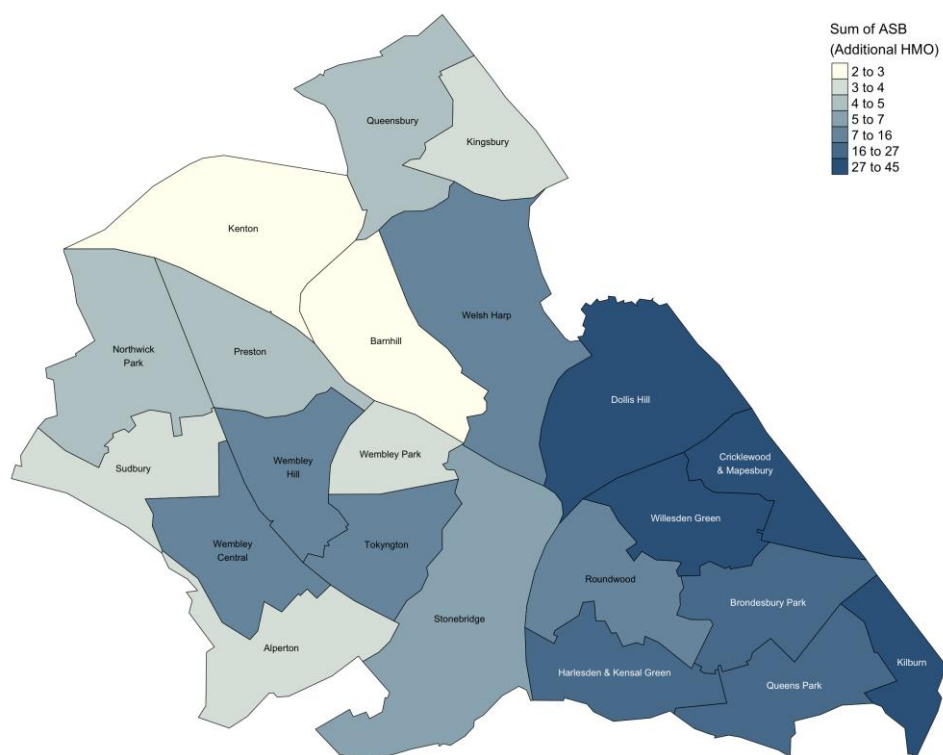


Figure 31. Total number of ASB incidents linked to Additional HMOs (April 2019 – March 2024) (Source: Ti 2024).

There were ASB incidents in all Brent wards (Map 23). There is a slight bias towards the southeastern wards.



Map 23. Distribution of total number of ASB incidents linked to Additional HMOs (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

6.2.3 Mandatory HMOs

Of the total ASB incidents 966 (40.8%) were linked to Mandatory HMOs. Willesden Green had the highest (130) total number of ASB incidents (Figure 32).

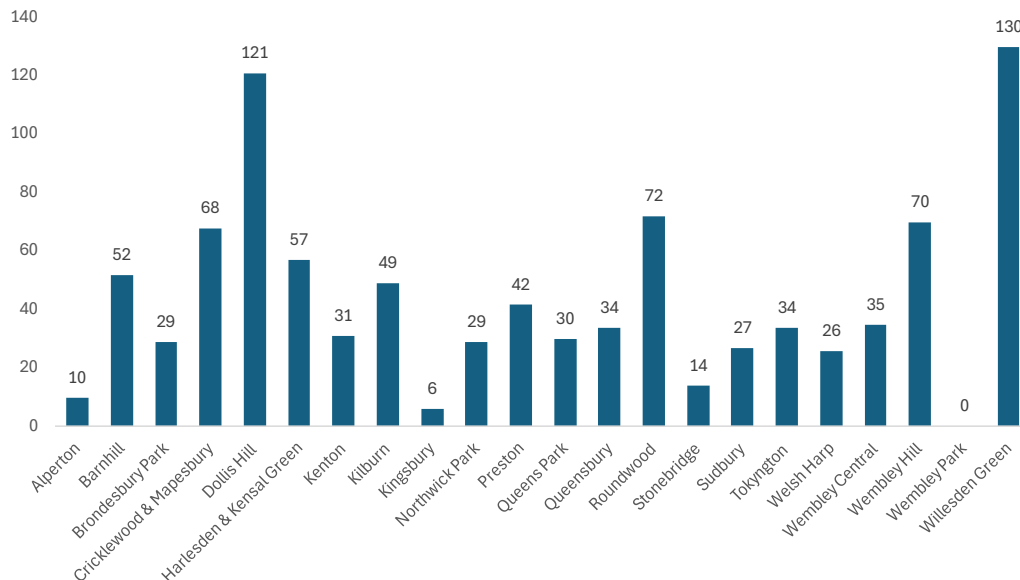
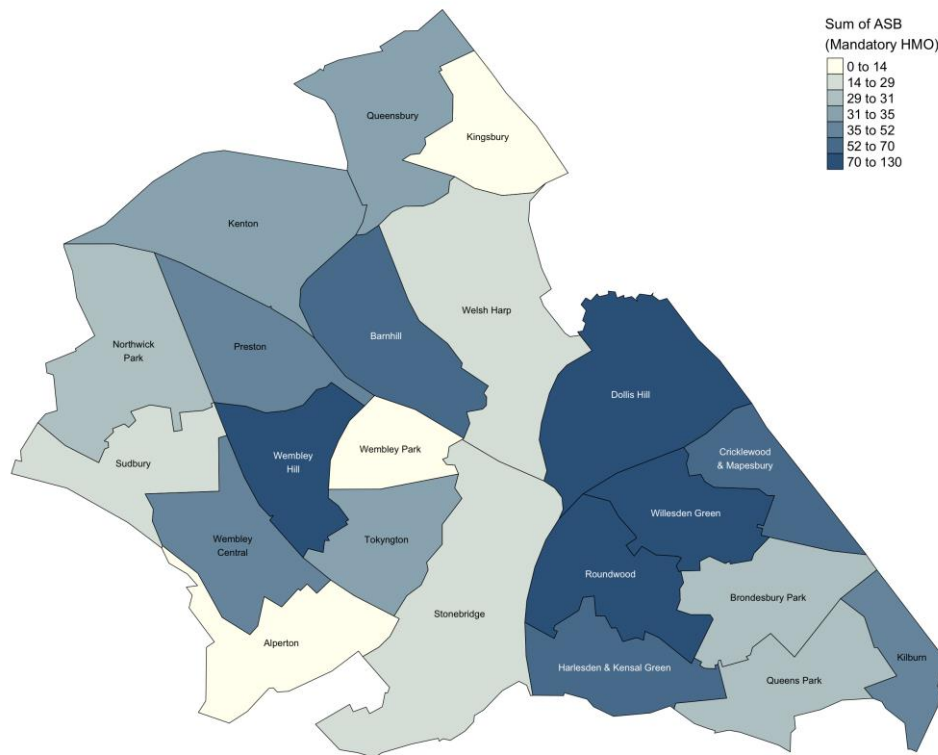


Figure 32. Total number of ASB incidents linked to Mandatory HMOs (April 2019 – March 2024) (Source: Ti 2024).

There were ASB incidents linked to Mandatory HMOs in all wards except Wembley Park (Map 24). In general, there is a slight bias towards the eastern wards.



Map 24. Distribution of total number of ASB incidents linked to Mandatory HMOs (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

6.2.4 Predicted/hidden HMOs

Of the total ASB Predicted/hidden HMOs accounted for 1126 incidents (47.6%). Kanton ward had the highest total (104) incidents (Figure 33).

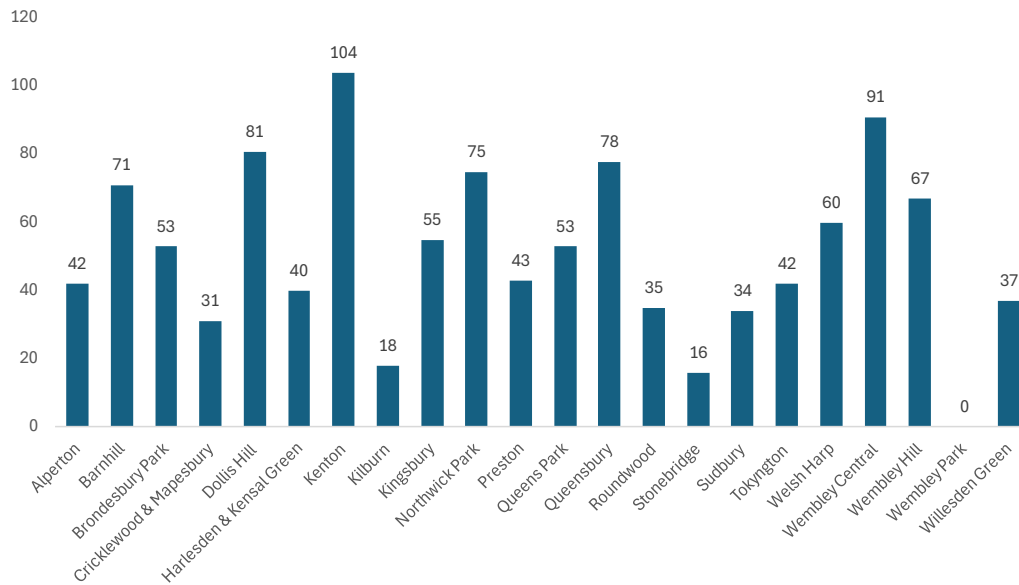
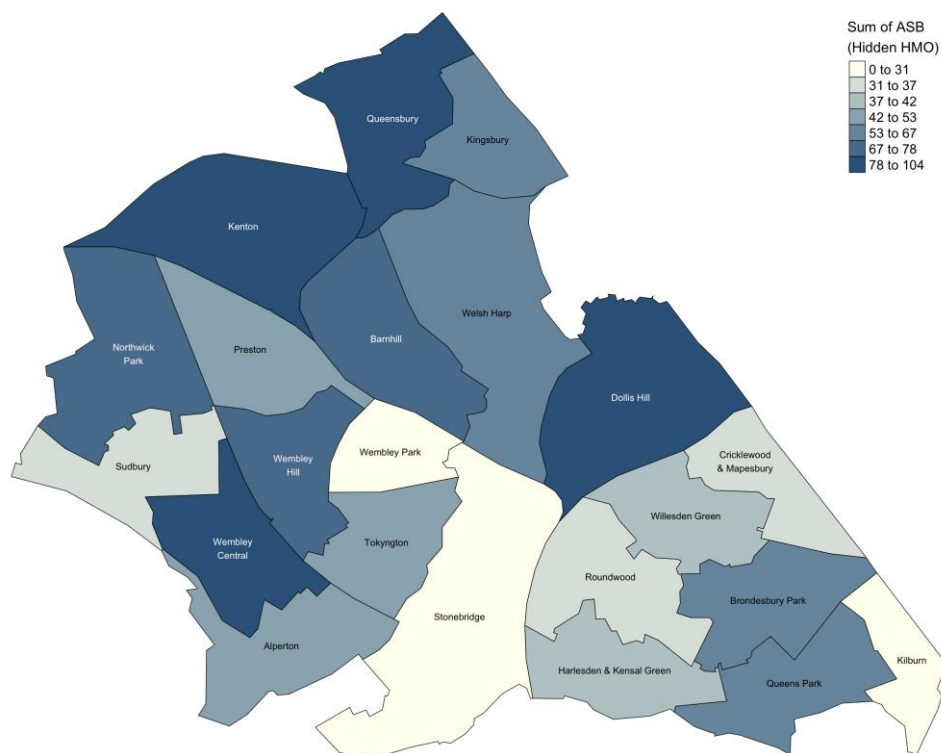


Figure 33. Total number of ASB incidents linked to Predicted/hidden HMOs (April 2019 – March 2024) (Source: Ti 2024).

There were ASB incidents linked to Predicted/hidden HMOs in all wards except Wembley Park (Map 25). ASB linked to Predicted/hidden HMOs seem particularly prevalent in the north.



Map 25. Distribution of total number of ASB incidents linked to Predicted/hidden HMOs (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

6.3 Repeat ASB

Some properties are linked to multiple ASB incidents. Repeat ASB incidents (2 or more at same property) provide an indication of persistent anti-social behaviour linked to HMO properties.

6.3.1 All HMOs

There were 518 HMOs (all types) with repeat ASB incidents. Dollis Hill (54), and Willesden Green (44) had the highest number of repeat ASB incidents (Figure 34).

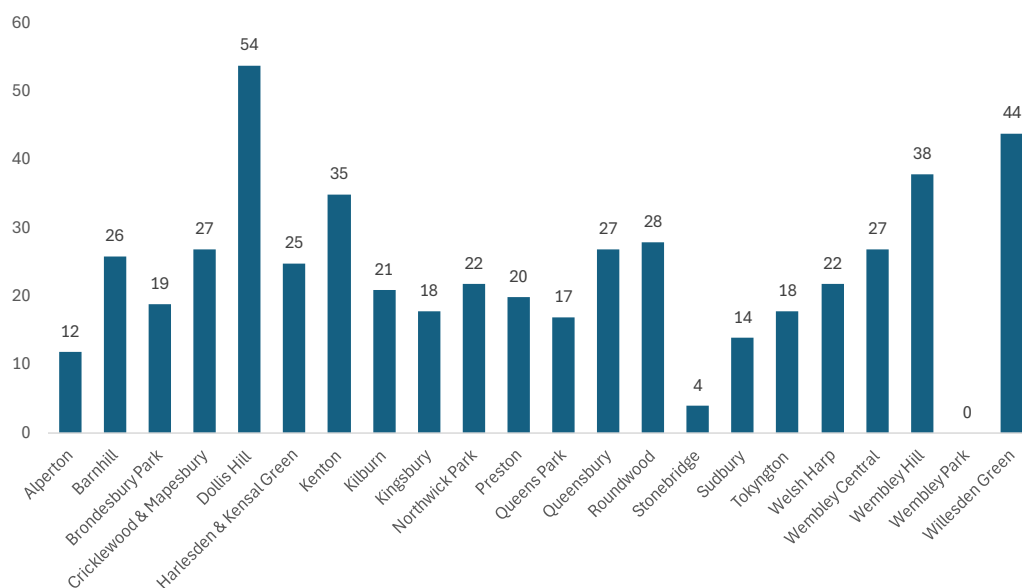
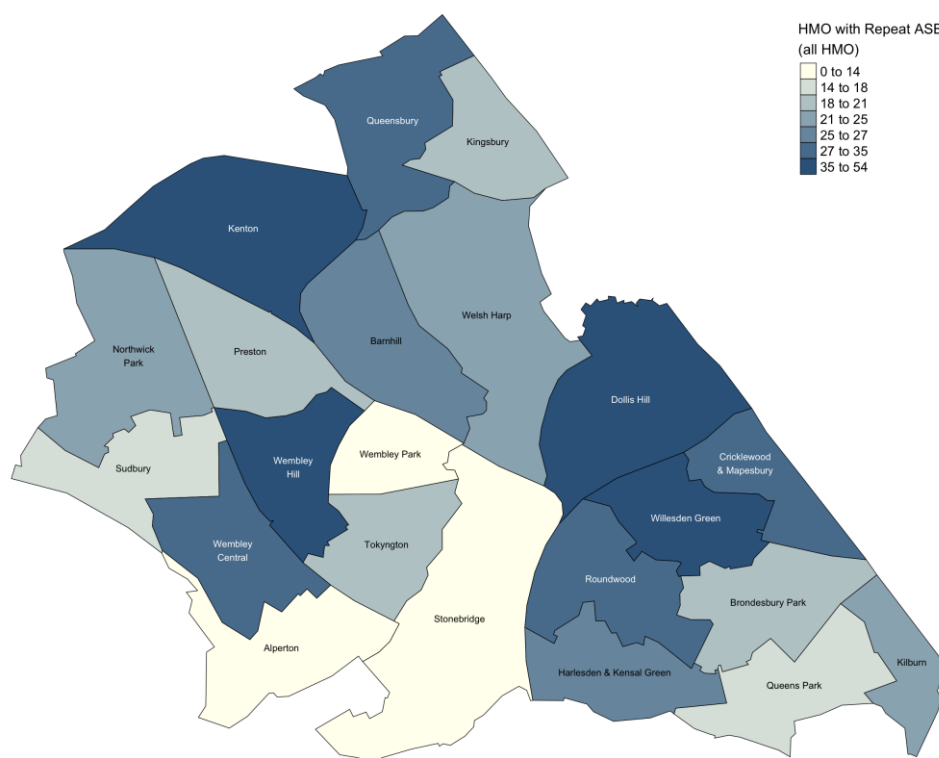


Figure 34. Number of HMOs (all types) with repeat ASB incidents (April 2019 – March 2024) (Source: Ti 2024).

Repeated ASB incidents at HMOs occurred across Brent, except for Wembley Park (Map 26). There are hotspots in the east, north, and at Wembley Hill ward.



Map 26. Number of All HMOs with repeated ASB incidents (April 2019 – March 2024)
(Source: Ti 2024, Map by Metastreet).

6.3.2 Additional HMOs

There were 47 Additional HMOs with repeated ASB incidents (9.1%). Four wards contributed substantially to this total: Willesden Green, Cricklewood & Mapesbury, Dollis Hill, and Kilburn (Figure 35).

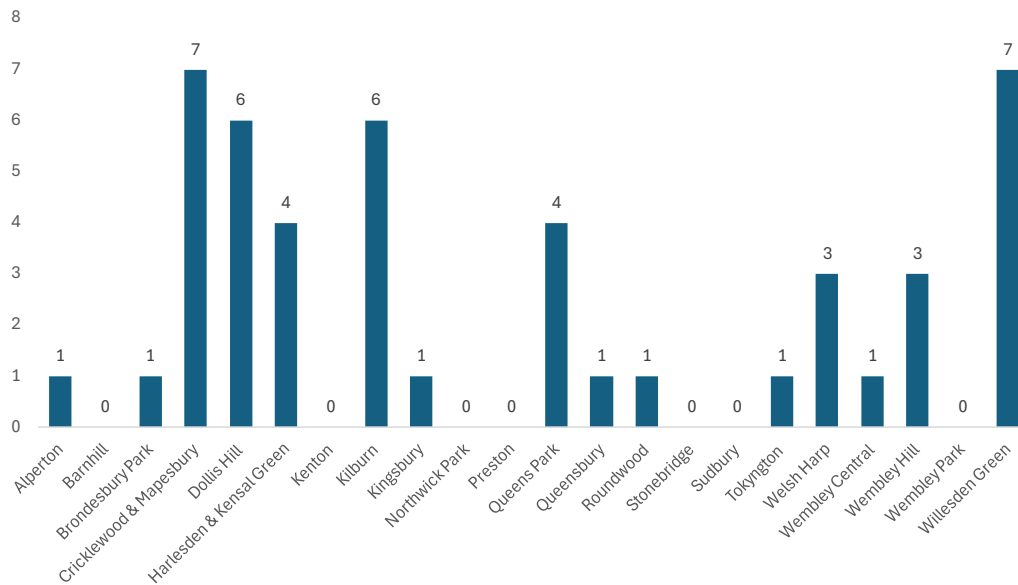
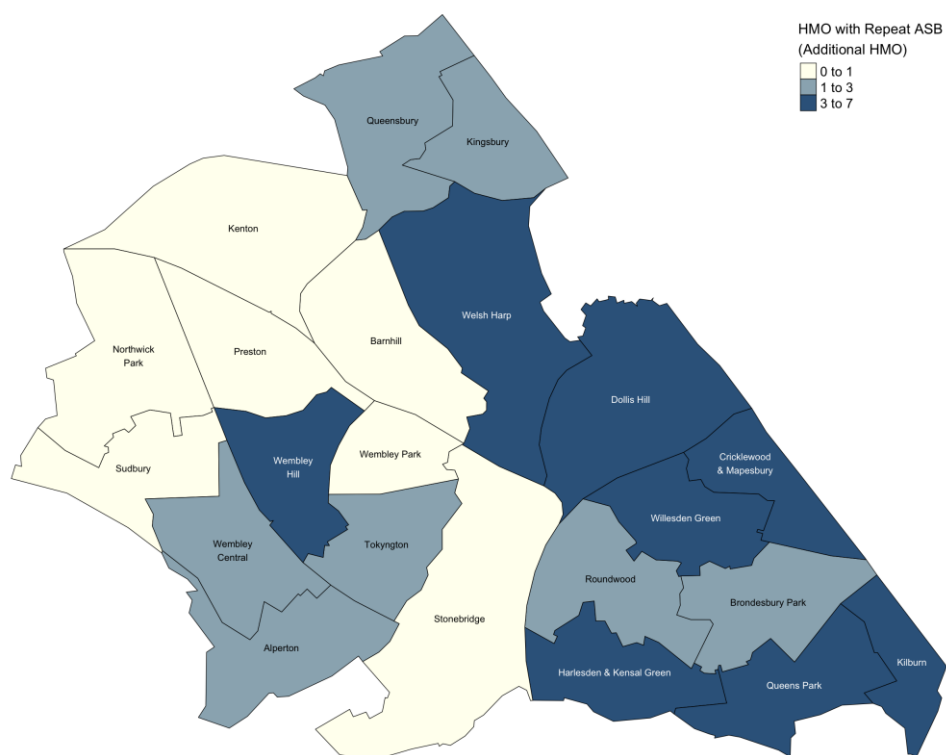


Figure 35. Number of Additional HMOs with repeat ASB incidents (April 2019 – March 2024) (Source: Ti 2024).

The majority of the repeat ASB incidents linked to Additional HMOs are from the east and southeastern wards (Map 27).



Map 27. Number of Additional HMOs with repeated ASB incidents (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

6.3.3 Mandatory HMOs

There were 213 Mandatory HMOs with repeated ASB incidents (41.1%). Willesden Green (31), and Dollis Hill (29) were the highest (Figure 36).

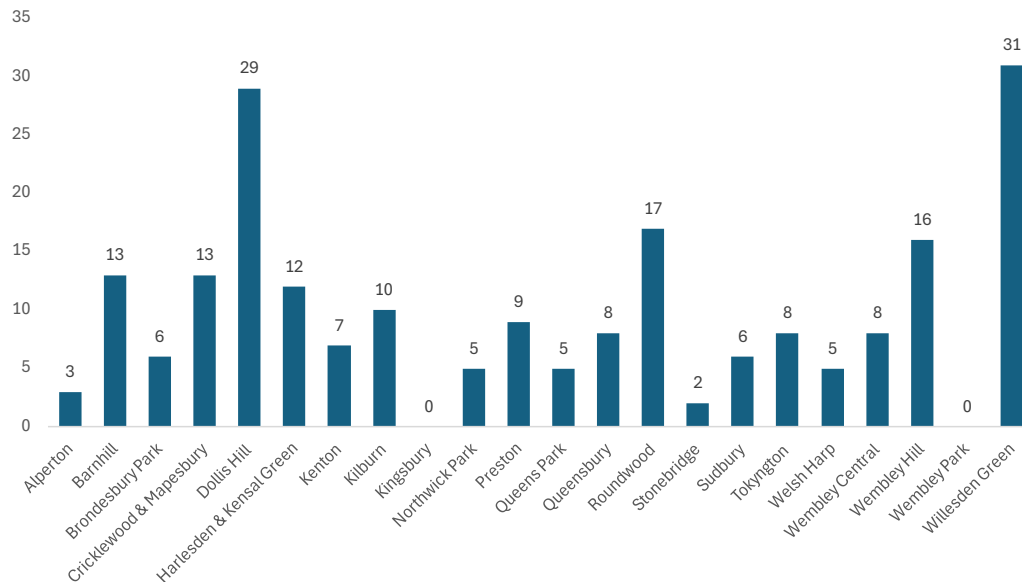
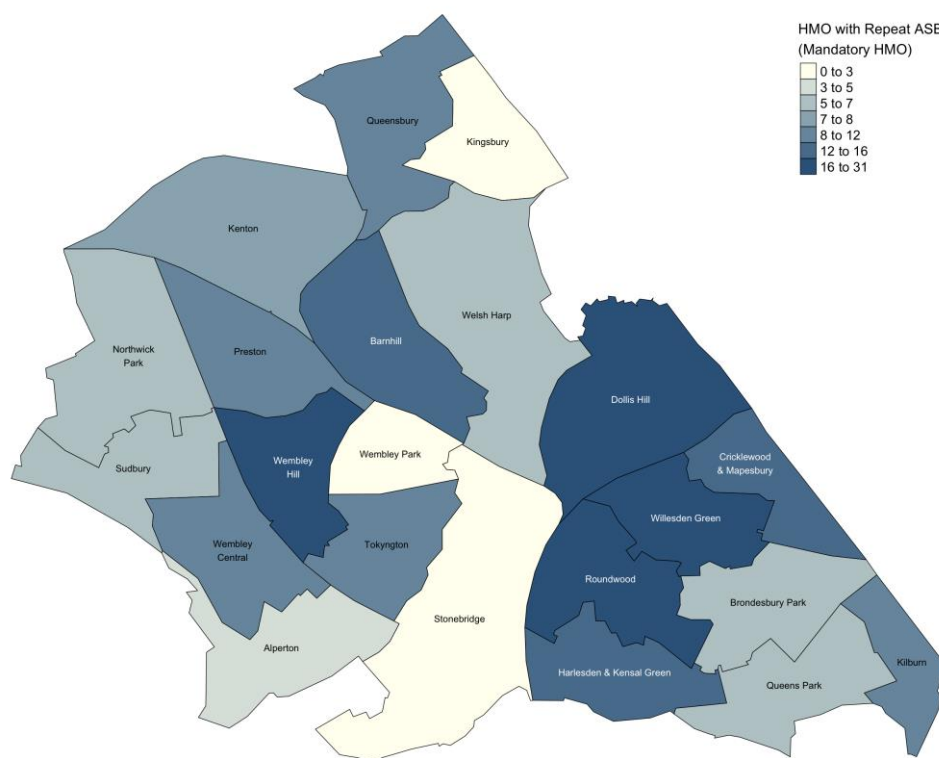


Figure 36. Number of Mandatory HMOs with repeat ASB incidents (April 2019 – March 2024) (Source: Ti 2024).

Repeat ASB incidents at Mandatory HMOs occurred throughout most of Brent (Map 28). There is a slight bias towards the eastern wards, but Wembley Hill is also notable.



Map 28. Number of Mandatory HMOs with repeated ASB incidents (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

6.3.4 Predicted/hidden HMOs

There were 258 Predicted/hidden HMOs linked to repeat ASB (49.8%). Kenton ward had the highest (28) number of Predicted/hidden HMOs with repeated ASB incidents (Figure 37).

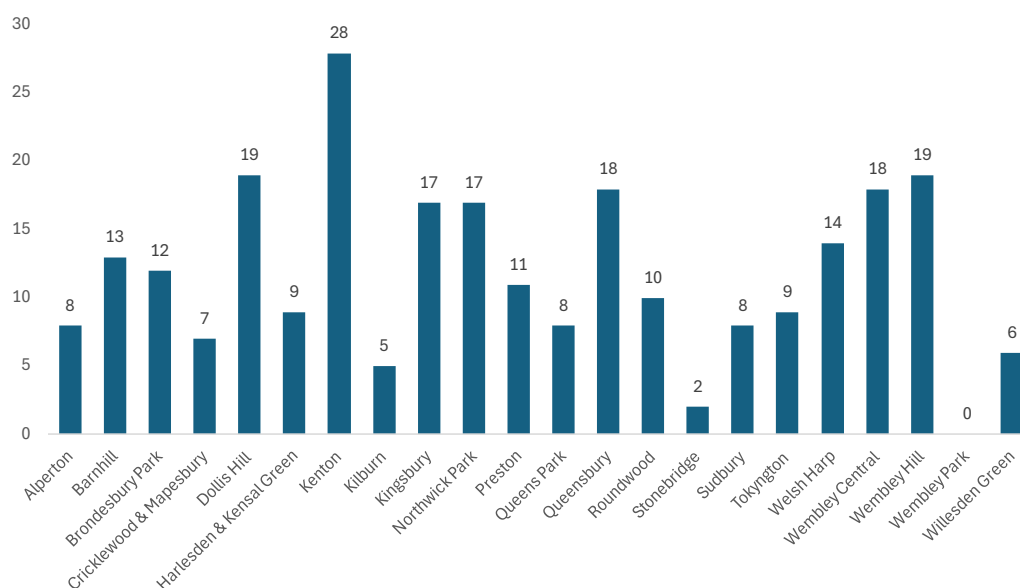
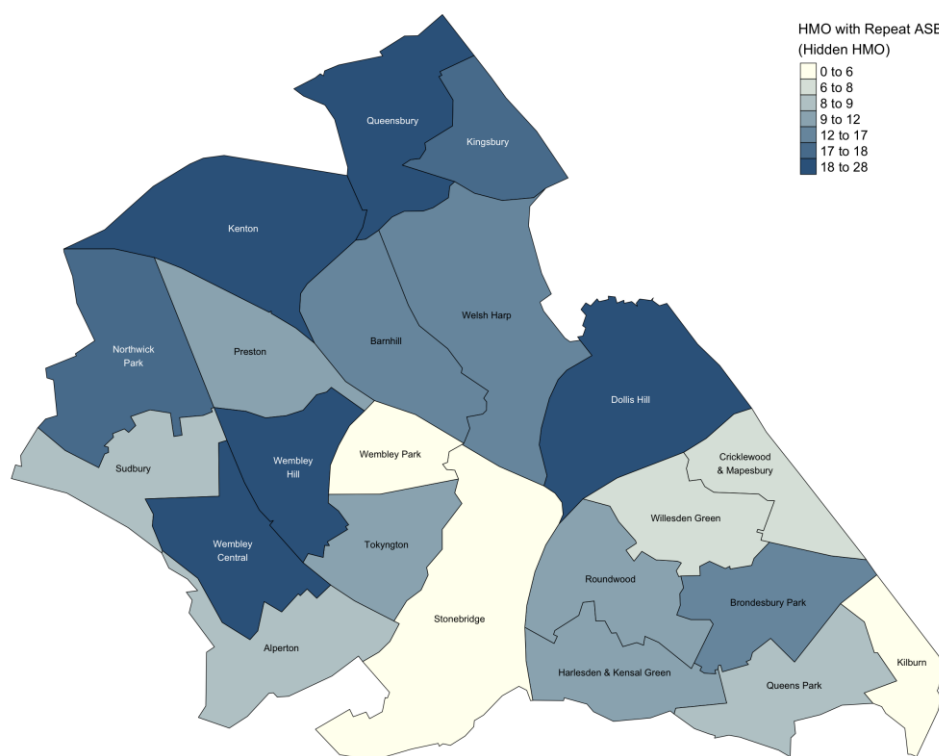


Figure 37. Number of Predicted/hidden HMOs with repeat ASB incidents (April 2019 – March 2024) (Source: Ti 2024).

Predicted/hidden HMO linked to repeat ASB incidents are widespread throughout Brent (Map 29). The distribution is uneven, with hotspots in the north (Queensbury, Kenton), west (Wembley Hill/Central), and east (Dollis Hill).



Map 29. Number of Predicted/hidden HMOs with repeated ASB incidents (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

6.4 Summary

The potential impact of hidden HMOs becomes most apparent when the proportions of the HMO types are compared to one another (Figure 38). Predicted/hidden HMOs account for about the same (45—50%) as Mandatory HMOs (41—42%, Figure 38). Additional HMOs account for much less (9—11%). Being able to identify hidden HMOs could be a helpful step in dealing with anti-social behaviour.

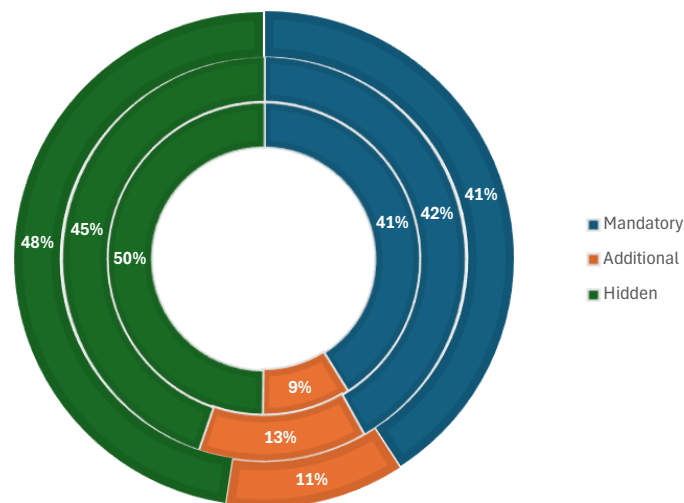


Figure 38. Relative proportions of HMO types in relation to ASB. Outer ring = HMO with ASB, Middle ring = Total ASB, Inner ring = HMO with Repeat ASB (April 2019 – March 2024) (Source: Ti 2024).

There are many types of anti-social behaviour, and council records provide insight into these. Of all the categories, the top 10 account for 95% of all recorded ASB incidents (Figure 39). Rowdy behaviour accounts for the vast majority of ASB incidents (72% of all ASB).

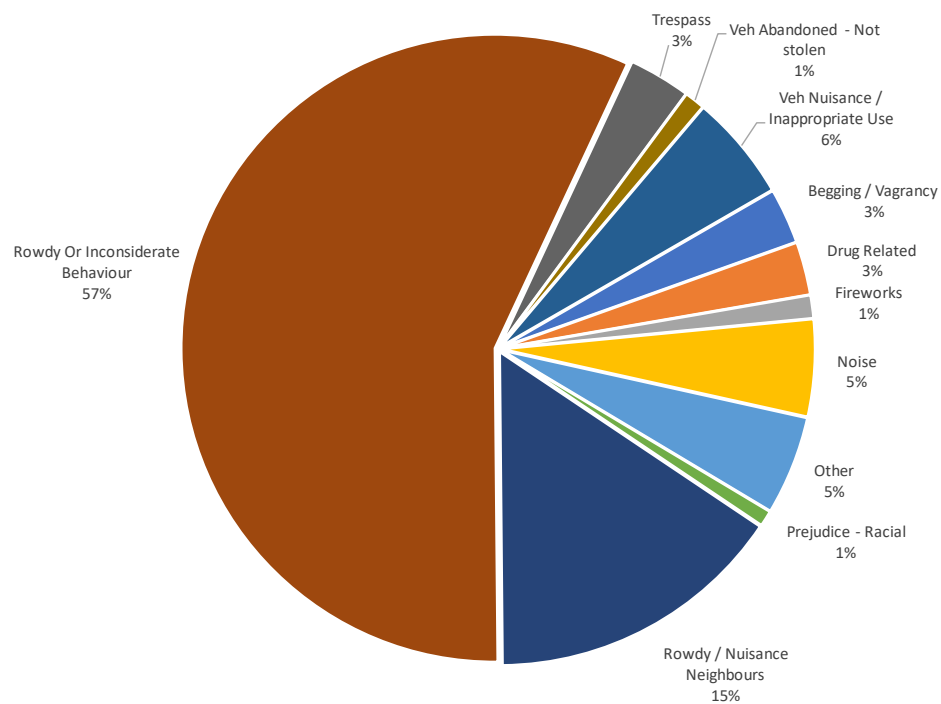


Figure 39. Categories for ASB incidents in Brent (April 2019 – March 2024) (Source Ti 2024).

7 Regulation and Enforcement

Brent Council uses a range of interventions to improve HMO standards, including enforcement and regulation. Enforcement includes using Housing Act and other public protection legislation to enforce standards and includes civil penalties and prosecutions.

Interventions can be a result of a complaint being made by a tenant about their accommodation or because of a proactive inspection. Regulation includes sector intervention using statutory housing and public health notices to address poor housing standards in the HMO sector. This includes notices to have HMOs repaired through to the prohibiting the use of some or all parts of a property.

7.1 All HMOs

Between April 2019 and March 2024, Brent Council used its regulatory powers to serve 101 Civil Penalty Notices (CPN) to HMOs (known and hidden) under housing and public protection legislation. Willesden Green had the greatest number of CPN served (12) during this period (Figure 40).

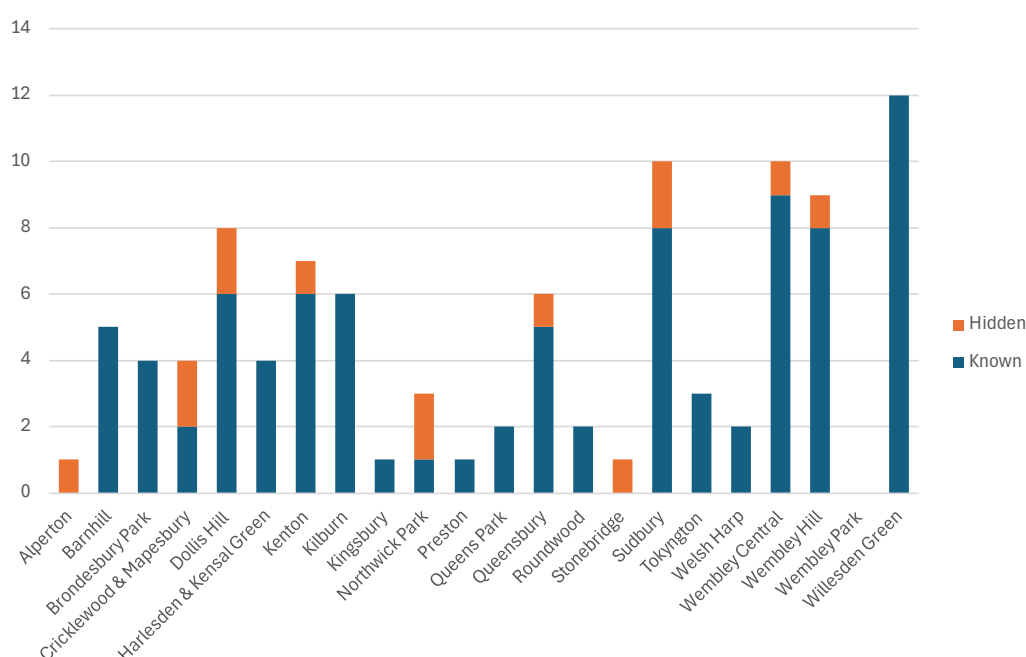
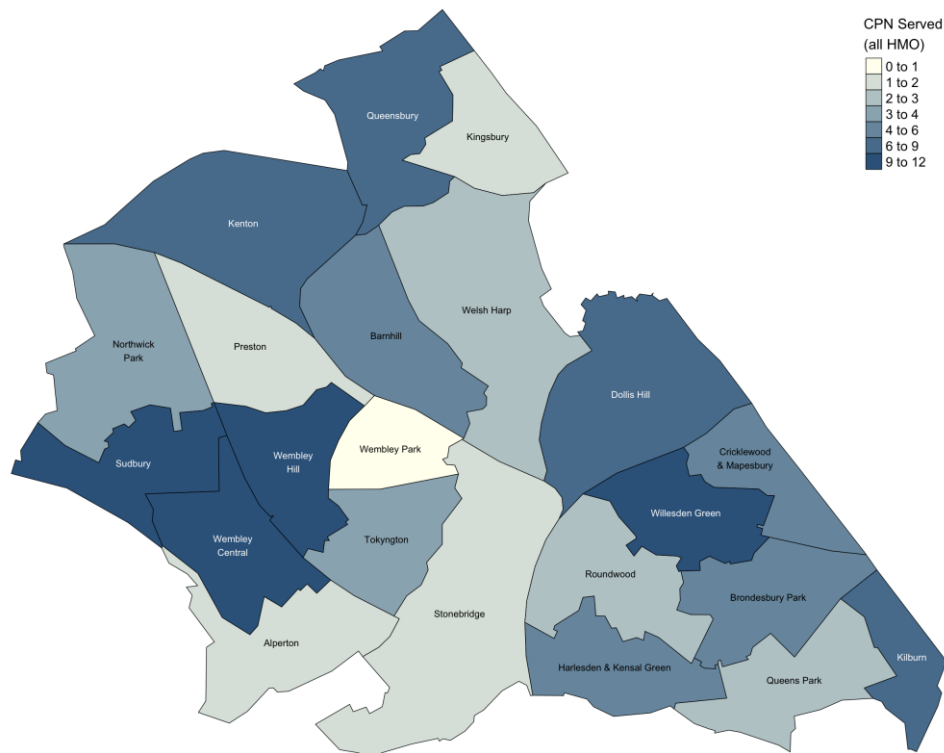


Figure 40. Regulation and enforcement interventions (CPN served) linked to All HMOs (known and hidden) by ward (April 2019 – March 2024) (Source TI 2024).

CPNs were served throughout the borough of Brent, with hotspots in the west, and in Willesden Green (Map 30).



Map 30. Distribution of regulation and enforcement interventions (CPN served) linked to All HMOs (known and hidden) April 2019 – March 2024 (Source Ti 2024, Map by Metastreet).

7.2 Known HMOs

It is most practical to look at Known HMOs (Additional and Mandatory) when considering CPNs.

Between April 2019 and March 2024, Brent Council used its regulatory powers to serve 87 Civil Penalty Notices (CPN) to Known HMOs (Additional and Mandatory) under housing and public protection legislation. Willesden Green had the greatest number of CPN served (12) during this period (Figure 41).

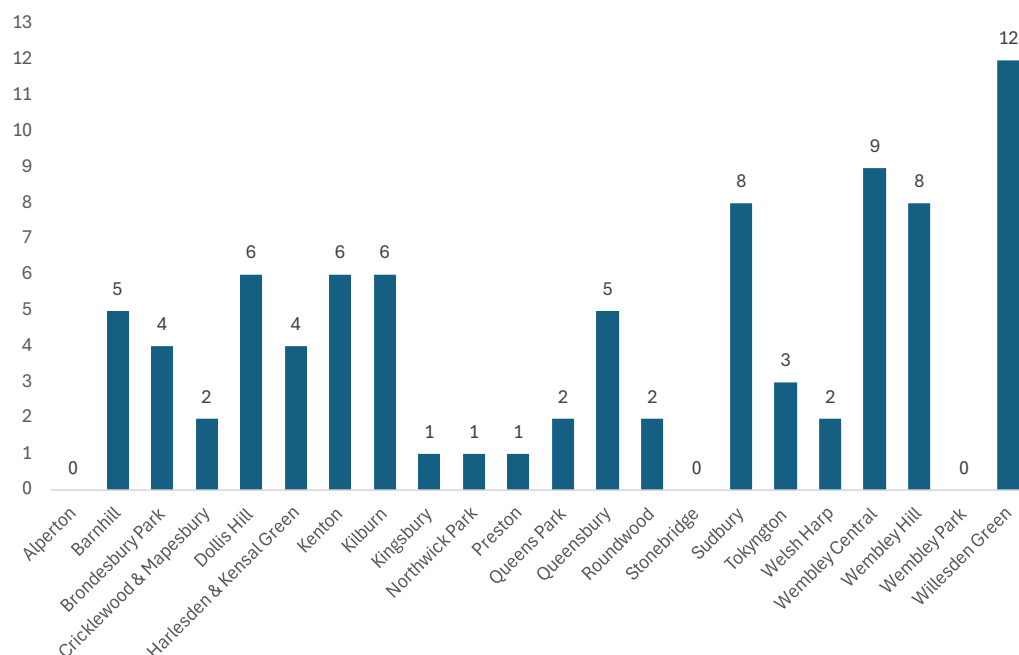
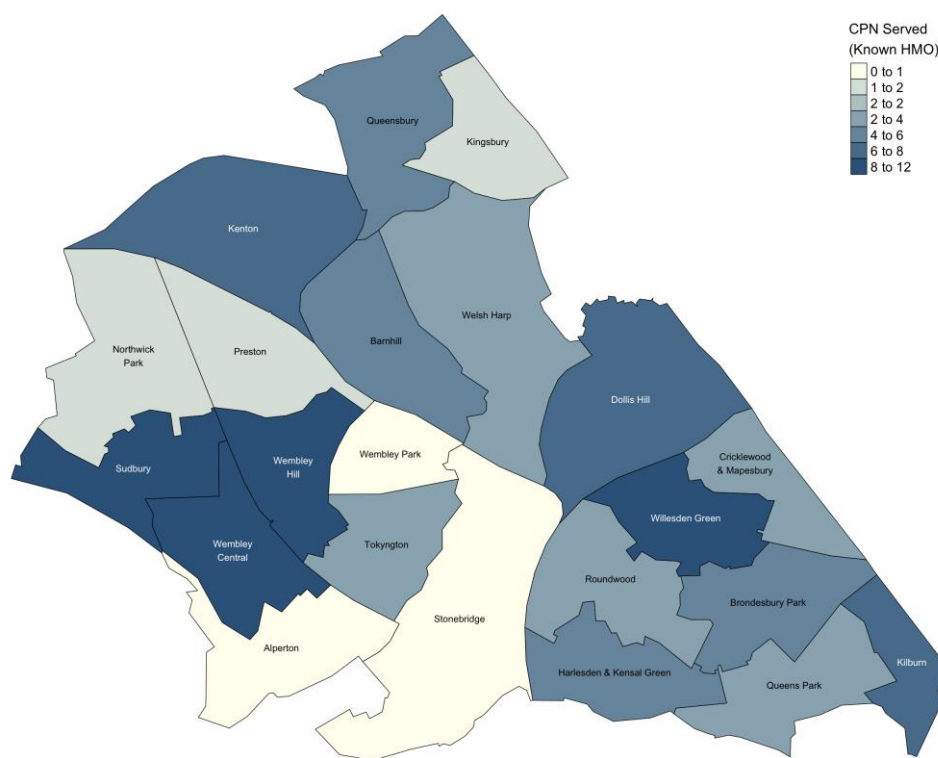


Figure 41. Regulation and enforcement interventions (CPN served) linked to Known HMOs (Additional and Mandatory) by ward (April 2019 – March 2024) (Source Ti 2024).

CPNs were served throughout the borough of Brent, with hotspots in the west, and in Willesden Green (Map 31).



Map 31. Distribution of regulation and enforcement interventions (CPN served) linked to Known HMOs (Additional and Mandatory) April 2019 – March 2024 (Source Ti 2024, Map by Metastreet).

7.3 Predicted/hidden HMOs

Between April 2019 and March 2024, Brent Council used its regulatory powers to serve 14 Civil Penalty Notices (CPN) to Predicted/hidden HMOs under housing and public protection legislation (Figure 42).

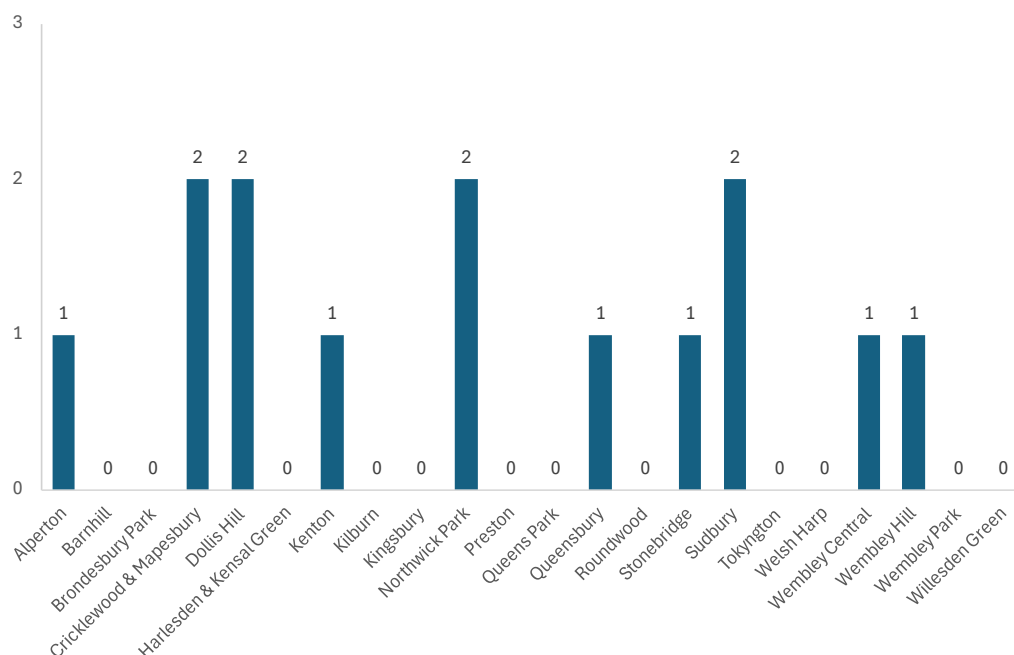
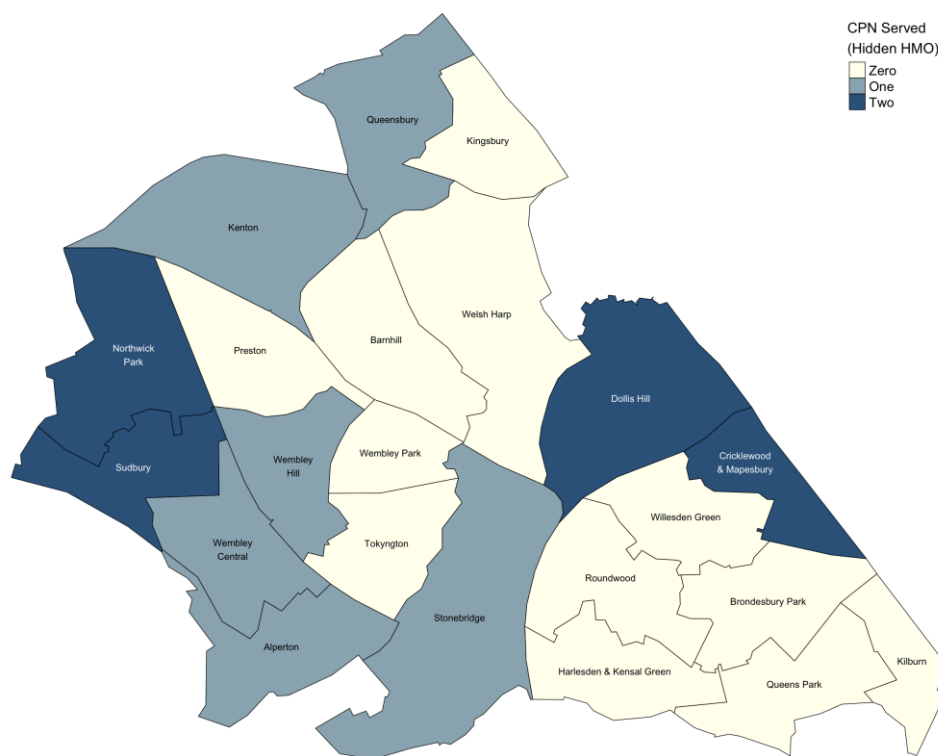


Figure 42. Regulation and enforcement interventions (CPN served) linked to Predicted/hidden HMOs by ward (April 2019 – March 2024) (Source Ti 2024).

CPNs were served across the borough of Brent, with hotspots in the west, and the east (Map 32).



Map 32. Distribution of regulation and enforcement interventions (CPN served) linked to Predicted/hidden HMOs April 2019 – March 2024 (Source Ti 2024, Map by Metastreet).

7.4 CPN Summary

Enforcement interventions, such as Civil Penalty Notices are seen as a last resort in the regulatory framework. The distribution between the HMO types is interesting (Figure 43).

Mandatory HMOs make up the largest proportion of CPNs served (73%), whilst Predicted/hidden HMOs account for 14%.

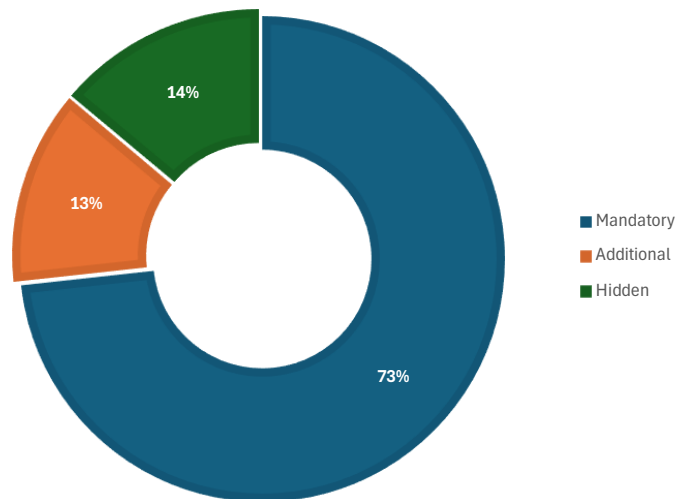


Figure 43. Proportions of CPN served to All HMOs (April 2019 – March 2024) (Source Ti 2024).

8 Summary

8.1 Population

The HMO population in Brent is made up of two main categories (described earlier); licenced HMOs (Additional and Mandatory) that share basic amenities (4,922); and Predicted/hidden HMOs that share basic amenities (2,209). The total HMO population in Brent is therefore calculated to be 7,131. The total HMO population is distributed across all wards. Wembley Park (931) has the most HMOs, whilst Alperton has the least (102) (Figure 2 & Map 2).

Additional HMOs are distributed across Brent (2,432). For this category, Wembley Park (923) has most HMOs, whilst Northwick Park (7) has the least (Figure 3 & Map 3). Mandatory HMOs are also widespread (2,490). Willesden Green ward has the highest number of Mandatory licences (339) (Figure 4 & Map 4). Predicted/hidden HMOs make up about one third of all HMOs (31%, 2,835). This group may either be exempt from licencing, unlicensed, or licenced as a single-family dwelling. It is not possible to identify from the data (where licensable) if the Predicted/hidden HMO properties would fall under Additional or Mandatory HMO requirements. Queens Park has the highest number of predicted hidden HMOs (202) (Figure 5 & Map 5).

Predicted/hidden (unlicensed) HMOs account for around one third (31%) of all HMOs across Brent (Figure 6). Northwick Park has the highest percentage of Predicted/hidden (therefore unlicensed) HMOs (73%).

The most common HMO property type in Brent are houses (70%), while bungalows are the least common property types (1%) (Figure 7).

8.2 Complaints

Brent recorded 902 HMO complaints (one or more) from tenants and others over a 5-year period (April 2019 – March 2024) across all HMO types (known and hidden).

There were 441 Mandatory HMOs linked to complaints by tenants and others to Brent Council. Dollis Hill (66) has the highest number of complaints (Figure 9).

There were 157 HMO Additional HMOs linked to complaints made by tenants and others to Brent Council (Figure 10). The highest number of complaints (21) were at Cricklewood and Mapesbury.

There were 304 Predicted/hidden HMOs linked to complaints made by tenants and others to the Council. Wembley Central (34) has the highest number of complaints (Figure 11).

Complaints are spread throughout the borough, with a slight bias towards the eastern wards (Map 6, Map 7, Map 8). However, when looking at Predicted/hidden HMOs the pattern becomes more divided, with concentrations of complaints predominantly from Wembley Central, Wembley Hill, Kenton, and Dollis Hill wards (Map 9).

For the period April 2019 – March 2024 there were 166 repeated complaints at All HMOs (known and hidden). Dollis Hill (23) had the highest number (Figure 12).

For the period April 2019 – March 2024 there were 84 repeated complaints at Mandatory HMOs. Dollis Hill (14) had the highest number (Figure 13).

For the period April 2019 – March 2024 there were 29 repeated complaints at Additional HMOs. Cricklewood & Mapesbury (6) had the highest number (Figure 14).

For the period April 2019 – March 2024 there were 53 repeated complaints at Predicted/hidden HMOs. Wembley Central (6) and Dollis Hill (6) had the highest number (Figure 15).

Overall, there were 902 complaints, and 166 repeated complaints. Mandatory HMOs had the most (441 & 81), with Predicted/hidden HMOs not far behind (304, 53) (Figure 16).

Although the absolute numbers of complaints and repeat complaints varied between HMO types (Figure 16), the proportion of all complaints that were repeated was remarkably consistent (around 18%, Figure 17).

8.3 Hazards

There are 1,955 HMOs (known and Predicted/hidden) properties in Brent that are likely to have at least 1 serious housing hazard (Category 1 and/or high scoring Category 2 hazards, HHSRS). Dollis Hill (191) has the greatest number, whilst Wembley Park (3) has the fewest (Figure 18, Map 14). This represents 27% of the known and Predicted/hidden HMO population, more than double the PRS national average (12%)⁸. Properties with serious hazards are distributed throughout Brent but there is a slight bias towards eastern wards (Map 14).

There are 255 Additional HMOs properties in Brent that are likely to have at least 1 serious housing hazard (Category 1 and/or high scoring Category 2 hazards, HHSRS). Willesden Green (50) has the highest number of predicted hazards, whilst Alperton (1) has the lowest (Figure 19, Map 15).

⁸ EHS Headline 2022-2023, <https://www.gov.uk/government/statistics/chapters-for-english-housing-survey-2022-to-2023-headline-report>

Although Additional HMOs with serious hazards are widespread there is a slight bias towards the eastern wards (Map 15).

Mandatory HMOs with serious hazards (784) are distributed across the whole borough (Figure 20, Map 16). New Willesden Green (98) and Dollis Hill (97) have the highest number of predicted hazards. Although Mandatory HMOs with serious hazards are widespread there is a slight bias towards the eastern wards (Map 16).

Predicted/hidden HMOs with serious hazards (916) are distributed across the whole borough. Kenton (79) and Dollis Hill (74) wards have the highest number of Predicted/hidden HMOs with predicted serious hazards (Figure 21). Predicted/hidden HMO properties with serious hazards can be found throughout Brent, with hot spots in Queens Park, Dollis Hill, Kenton, Barnhill, and Wembley Central (Map 17).

8.4 EPC rating

As part of this study, 3,620 EPC ratings were matched to known HMO properties (Figure 22). All figures have been modelled from this group. The housing stock is dominated by EPC ratings C & D (78%), with B & E ratings less so (21%). The A, F & G ratings are the least common (Figure 23).

Brent has 458 HMO EPC records that are E, F, & G rated (Figure 25). EPC ratings E, F, & G represent properties with the least energy efficiency. Willesden Green (76) and Cricklewood & Mapesbury (49) have the highest number of EPC ratings E-G (Figure 25). It has been calculated using the matched addresses that 1.1% (102) of HMO properties (known and Predicted/hidden) in Brent have F and G rating.

8.5 Anti-social behaviour

Across Brent 1,525 HMO properties (all types) have recorded ASB incidents. Dollis Hill (157) has the highest number of HMOs with ASB incidents (Figure 26). HMOs where ASB incidents occur are widespread throughout Brent, with a bias towards some of the eastern wards (Map 18).

There were 206 Additional HMOs linked to ASB incidents in Brent (13.5%). Willesden Green (34) has the highest number of complaints (Figure 27). ASB incidents linked to Additional HMOs are distributed across most of the borough, with hotspots in certain areas such as Dollis Hill, Wembley Hill, Willesden Green, and Harlesden & Kensal Green (Map 19).

There were 637 Mandatory HMOs linked to ASB incidents throughout Brent (41.8%). Willesden Green (82) and Dollis Hill (81) have the highest number of complaints (Figure 28). Most wards have

ASB linked to HMOs (Wembley Park is an exception) with eastern wards having higher concentrations (Map 20).

There were 682 Predicted/hidden HMOs linked to ASB incidents (44.7%). Wembley Central has the highest number of (hidden) HMOs with ASB incidents (59), with Dollis Hill (57) and Kenton (56) not far behind (Figure 29). All wards (except Wembley Park) have ASB linked to Predicted/hidden HMOs (Map 21). There is a slight bias towards the northern wards.

Overall, there were 2,366 ASB incidents linked to all HMOs. The most (229) were from Dollis Hill (Figure 30). ASB incidents are widespread throughout Brent (Map 22). There are hot spots in the east (Dollis Hill, Willesden Green), north (Kenton), and Wembley Hill ward.

Of the total ASB incidents 274 (11.6%) were linked to Additional HMOs. Willesden Green had the highest (45) total number of ASB incidents (Figure 31). There were ASB incidents in all Brent wards (Map 23). There is a slight bias towards the southeastern wards.

Of the total ASB incidents 966 (40.8%) were linked to Mandatory HMOs. Willesden Green had the highest (130) total number of ASB incidents (Figure 32). There were ASB incidents linked to Mandatory HMOs in all wards except Wembley Park (Map 24). In general, there is a slight bias towards the eastern wards.

Of the total ASB Predicted/hidden HMOs accounted for 1126 incidents (47.6%). Kenton ward had the highest total (104) incidents (Figure 33). There were ASB incidents linked to Predicted/hidden HMOs in all wards except Wembley Park (Map 25). ASB linked to Predicted/hidden HMOs seem particularly prevalent in the north.

There were 518 HMOs (all types) with repeat ASB incidents. Dollis Hill (54), and Willesden Green (44) had the highest number of repeat ASB incidents (Figure 34). Repeated ASB incidents at HMOs occurred across Brent, except for Wembley Park (Map 26). There are hotspots in the east, north, and at Wembley Hill ward.

There were 47 Additional HMOs with repeated ASB incidents (9.1%). Four wards contributed substantially to this total: Willesden Green, Cricklewood & Mapesbury, Dollis Hill, and Kilburn (Figure 35). The majority of the repeat ASB incidents linked to Additional HMOs are from the east and southeastern wards (Map 27).

There were 213 Mandatory HMOs with repeated ASB incidents (41.1%). Willesden Green (31), and Dollis Hill (29) were the highest (Figure 36). Repeat ASB incidents at Mandatory HMOs occurred

throughout most of Brent (Map 28). There is a slight bias towards the eastern wards, but Wembley Hill is also notable.

There were 258 Predicted/hidden HMOs linked to repeat ASB (49.8%). Kenton ward had the highest (28) number of Predicted/hidden HMOs with repeated ASB incidents (Figure 37). Predicted/hidden HMO linked to repeat ASB incidents are widespread throughout Brent (Map 29). The distribution is uneven, with hotspots in the north (Queensbury, Kenton), west (Wembley Hill/Central), and east (Dollis Hill).

Predicted/hidden HMOs account for about the same (45—50%) as Mandatory HMOs (41—42%) for all recorded ASB (Figure 38). Additional HMOs account for much less (9—11%). Being able to identify hidden HMOs could be a helpful step in dealing with anti-social behaviour.

There are many types of anti-social behaviour, and council records provide insight into these. Of all the categories, the top 10 account for 95% of all recorded ASB incidents (Figure 39). Rowdy behaviour accounts for the vast majority of ASB incidents (72% of all ASB). Note that these figures are all ASB incidents and not necessarily those linked to HMOs.

8.6 Civil Penalty Notices

Between April 2019 and March 2024, Brent Council served 101 Civil Penalty Notices (CPN) to HMOs (known and hidden) under housing and public protection legislation. Willesden Green had the greatest number of CPN served (12) during this period (Figure 40).

Between April 2019 and March 2024, Brent Council served 87 Civil Penalty Notices (CPN) to Known HMOs (Additional and Mandatory) under housing and public protection legislation. Willesden Green had the greatest number of CPN served (12) during this period (Figure 41). CPNs were served throughout the borough of Brent, with hotspots in the west, and in Willesden Green (Map 31).

Between April 2019 and March 2024, Brent Council served 14 Civil Penalty Notices (CPN) to Predicted/hidden HMOs under housing and public protection legislation (Figure 42). CPNs were served across the borough of Brent, with hotspots in the west, and the east (Map 32).

Appendix 1 – Ward summaries

The ward summaries show the data used to create the summary graphs and maps for the 22 wards in the borough of Brent.

Table 1. HMO overview (known HMOs, Additional) (Source Ti 2024).

Ward	HMOs	HMO complaints	Repeat complaints (2 or more incidents)	HMOs with hazards (1 or more)	HMOs with ASB (1 or more incidents)	Sum of HMO ASB incidents	Repeat ASB (2 or more incidents)	CPN served
Alperton	17	1	0	1	1	3	1	0
Barnhill	9	2	0	2	2	2	0	0
Brondesbury Park	133	11	1	16	14	16	1	0
Cricklewood & Mapesbury	150	21	6	30	21	32	7	1
Dollis Hill	85	12	3	20	19	27	6	1
Harlesden & Kensal Green	167	18	3	26	20	24	4	0
Kenton	23	5	1	4	2	2	0	2
Kilburn	165	18	3	24	24	34	6	2
Kingsbury	10	5	1	2	2	3	1	1
Northwick Park	7	0	0	4	4	4	0	0
Preston	18	3	0	4	5	4	0	0
Queens Park	166	7	0	21	16	20	4	0
Queensbury	13	2	0	4	3	4	1	0
Roundwood	74	9	2	12	8	10	1	0
Stonebridge	54	1	0	5	4	5	0	0
Sudbury	20	1	0	3	3	3	0	3
Tokington	21	4	1	3	2	7	1	0
Welsh Harp	23	2	0	4	4	7	3	0
Wembley Central	34	7	2	7	7	7	1	2
Wembley Hill	83	10	4	10	8	12	3	0
Wembley Park	923	1	0	3	3	3	0	0
Willesden Green	237	17	2	50	34	45	7	1
Total	2432	157	29	255	206	274	47	13

Table 2. HMO overview (known HMOs, Mandatory) (Source Ti 2024).

Ward	HMOs	HMO complaints	Repeat complaints (2 or more incidents)	HMOs with hazards (1 or more)	HMOs with ASB (1 or more incidents)	Sum of HMO ASB incidents	Repeat ASB (2 or more incidents)	CPN served
Alperton	36	5	0	8	7	10	3	0
Barnhill	74	26	5	32	29	52	13	5
Brondesbury Park	90	14	2	22	19	29	6	4
Cricklewood & Mapesbury	198	32	6	61	45	68	13	1
Dollis Hill	294	66	14	97	81	121	29	5
Harlesden & Kensal Green	178	33	9	53	43	57	12	4
Kenton	85	12	1	27	21	31	7	4
Kilburn	125	16	6	33	30	49	10	4
Kingsbury	33	0	0	8	6	6	0	0
Northwick Park	43	15	3	18	14	29	5	1
Preston	77	13	2	33	28	42	9	1
Queens Park	118	14	2	21	23	30	5	2
Queensbury	67	11	0	21	18	34	8	5
Roundwood	168	29	5	59	45	72	17	2
Stonebridge	72	9	2	23	11	14	2	0
Sudbury	81	13	2	27	22	27	6	5
Tokington	83	24	4	29	22	34	8	3
Welsh Harp	92	13	2	27	20	26	5	2
Wembley Central	76	17	2	28	23	35	8	7
Wembley Hill	153	32	6	59	48	70	16	8
Wembley Park	8	0	0	0	0	0	0	0
Willesden Green	339	47	11	98	82	130	31	11
Total	2490	441	84	784	637	966	213	74

Table 3. HMO overview (Predicted/hidden HMOs) (Source Ti 2024).

Ward	HMOs	HMO complaints	Repeat complaints (2 or more incidents)	HMOs with hazards (1 or more)	HMOs with ASB (1 or more incidents)	Sum of HMO ASB incidents	Repeat ASB (2 or more incidents)	CPN served
Alperton	49	9	1	23	19	42	8	1
Barnhill	120	17	5	62	48	71	13	0
Brondesbury Park	126	15	3	54	35	53	12	0
Cricklewood & Mapesbury	98	7	1	43	22	31	7	2
Dollis Hill	168	27	6	74	57	81	19	2
Harlesden & Kensal Green	114	16	4	43	27	40	9	0
Kenton	188	31	5	79	56	104	28	1
Kilburn	49	4	1	23	11	18	5	0
Kingsbury	67	4	0	29	27	55	17	0
Northwick Park	133	11	1	56	41	75	17	2
Preston	84	15	2	34	28	43	11	0
Queens Park	202	17	2	62	39	53	8	0
Queensbury	99	14	3	44	37	78	18	1
Roundwood	59	6	0	23	22	35	10	0
Stonebridge	28	9	3	9	10	16	2	1
Sudbury	71	12	2	25	21	34	8	2
Tokington	58	10	2	28	24	42	9	0
Welsh Harp	113	11	0	48	35	60	14	0
Wembley Central	156	34	6	72	59	91	18	1
Wembley Hill	129	23	5	46	43	67	19	1
Wembley Park	0	0	0	0	0	0	0	0
Willesden Green	98	12	1	39	21	37	6	0
Total	2209	304	53	916	682	1126	258	14

Appendix 2 – Tenure Intelligence (Ti) – stock modelling methodology

This Appendix explains at a summary level Metastreet’s Tenure Intelligence (Ti) methodology (Figure 44).

Ti uses big data and machine learning in combination with expert housing knowledge to accurately define outcome at the property level.

Council and external data have been assembled as set out in Metastreet’s data specification to create a property data warehouse comprising millions of cells of data.

Where necessary, machine learning is used to make predictions of defined outcomes for each residential property, using known outcome data provided by the council.

Results are analysed by skilled practitioners to produce a summary of housing stock, predictions of levels of property hazards and other property stressors. The results of the analysis can be found in the report findings chapter.

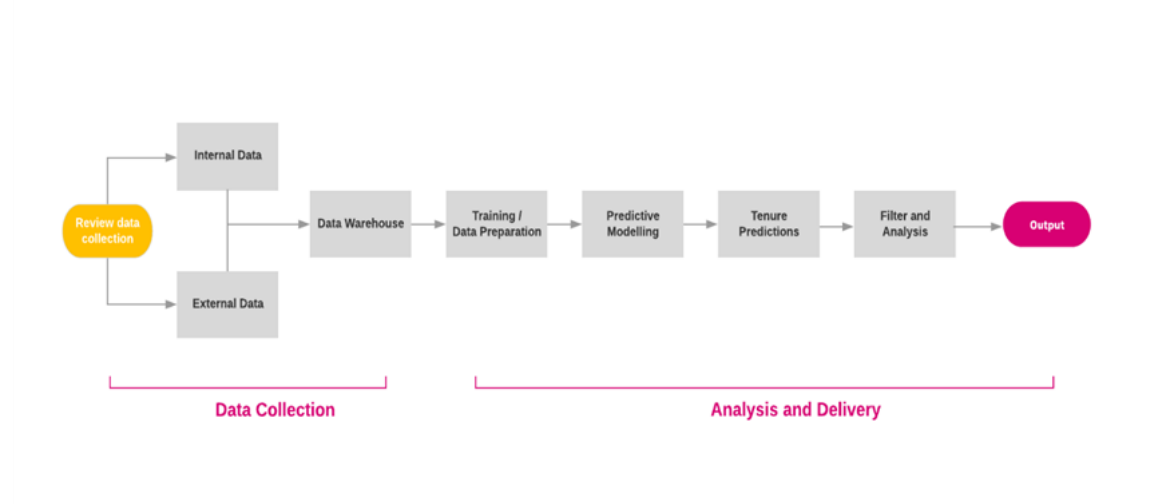


Figure 44. Summary of Metastreet Tenure Intelligence methodology.

Methodology

Metastreet has worked with Brent to create a residential property data warehouse based on a detailed specification. All longitudinal council held data is 5 consecutive years, from April 2019 – March 2024 unless otherwise specified.

Once the property data warehouse was created, the Ti model was used to predict tenure and stock condition using the methodology outlined below.

Machine learning was utilised to develop predictive models using training data provided by the council. Predictive models were tested against all residential properties to calculate risk scores for each outcome. Scores were integrated back into the property data warehouse for analysis.

Many combinations of risk factors were systematically analysed for their predictive power using logistic regression. Risk factors that duplicated other risk factors but were weaker in their predictive effect were eliminated. Risk factors with low data volume or higher error are also eliminated. Risk factors that were not statistically significant are excluded through the same processes of elimination. The top 5 risk factors for each model have the strongest predictive combination.

Using a D^2 constant calculation it is possible to measure the theoretical quality of the model fit to the training data sample. This calculation has been completed for each model. The D^2 is a measure of “predictive capacity”, with higher values indicating a better model.

Based on the modelling each residential property is allocated a probability score between 0-1. A probability score of 0 indicates a strong likelihood that the property tenure type is *not* present, whilst a score of 1 indicates a strong likelihood the tenure type *is* present.

Predictive scores are used in combination to sort, organise and allocate each property to one of 4 categories described above. Practitioner skill and experience with the data and subject matter is used to achieve the most accurate tenure split.

It is important to note that this approach cannot be 100% accurate as all mathematical models include error for a range of reasons. The D^2 value is one measure of model “effectiveness”. The true test of predictions is field trials by the private housing service. However, error is kept to a minimum through detailed post analysis filtering and checking to keep errors to a minimum.

A continuous process of field testing and model development is the most effective way to develop accurate tenure predictions.

The following tables include detail of each selected risk factors for each model. Results of the null hypothesis test are also presented as shown by the $Pr(>Chi)$ results. Values of <0.05 are generally considered to be statistically significant. All the models show values much smaller, indicating much stronger significance.

Serious hazards (HHSRS) model

Numerous properties where the local housing authority has recently taken action to address serious hazards were sampled for training data. Specifically, this included Housing Act 2004 Notices served

on properties to address serious hazards. The model results show that each of the model terms is statistically significant, with the overall model having a “predictive capacity” of around 94% (Table 4).

Table 4. Serious hazard (HHSRS) predictive factors.

Risk factors selected	Pr (>Chi) *
CURRENT_ENERGY_EFFICIENCY	2.2e-16
ASB.all.types	2.2e-16
PRS.intervention	2.2e-16
Planning_enforcement	3.272e-06
Bens.number	1.708e-08
Training data, n= 417	
D ² test = 0.94	

HMO predictive model

The HMO model shows that each of the 5 model terms is statistically significant, with the overall model having a “predictive capacity” of around 68% (Table 5).

Table 5. HMO predictive factors.

Risk factors selected	Pr(>Chi)
ASB.all.types	1.530e-15
NUMBER_HABITABLE_ROOMS	2.2e-16
TOTAL_FLOOR_AREA	2.2e-16
Electors_Removed_Since_2018	2.2e-16
Planning_enforcement	2.2e-16
Training data, n= 1133	
D ² test = 0.68	

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**Cabinet Report October 2025
Private Housing Licensing in Brent**

Appendix 5:

Title: Designation Area for Additional Licensing



Designation of an area for Additional Licensing

The London Borough of Brent Council Designation of an Area for Additional Licensing of Houses in Multiple Occupation 2026.

The London Borough of Brent Council in exercise of their powers under section 56 of the Housing Act 2004 ("the Act") hereby designates for additional licensing of Houses in Multiple Occupation ("HMOs") the area described in paragraph 4.

CITATION, COMMENCEMENT AND DURATION

1. This designation may be cited as the London Borough of Brent Council Designation for an Area for Additional Licensing of Houses in Multiple Occupation 2026.
2. This designation is made on **Date to be confirmed** and shall come into force on **Date to be confirmed**.
3. This designation shall cease to have effect on **Date to be confirmed** or earlier if the Council revokes the scheme under section 60 of the Act.

AREA TO WHICH THE DESIGNATION APPLIES

4. This designation shall apply to the area of the district of the London Borough of Brent as delineated and edged red on the map at Annex A.

APPLICATION OF THE DESIGNATION

5. This designation applies to all Houses in Multiple Occupation described in Annex B and within the area described in paragraph 4 unless –
 - (a) the building is of a description specified in Annex C (Buildings that are not HMOs for the purpose of the Act - other than Part 1);
 - (b) the HMO is subject to an Interim or Final Management Order under Part 4 of the Act;
 - (c) the HMO is subject to a temporary exemption under section 62 of the Act; or
 - (d) the HMO is required to be licensed under section 55 (2) (a) of the Act (mandatory licensing).¹

¹ For the application of mandatory licensing see SI 371/2006 – The Licensing of Houses in Multiple Occupation (Prescribed Descriptions) (England) Order 2006

EFFECT OF THE DESIGNATION

6. Subject to sub paragraphs 5(a) to (d), every HMO of the description specified in Annex B and in the area specified in paragraph 4 shall be required to be licensed under section 61 of the Act.²

7. The London Borough of Brent Council will comply with the notification requirements contained in section 59 of the Act and shall maintain a register of all houses registered under this designation, as required under section 232 of the Act.³

This designation is given general approval by the Cabinet of the London Borough of Brent Council

This designation falls within a description of designations in relation to which the Secretary of State has given a general approval under section 58 of the Act, namely The Housing Act 2004: Licensing of Houses in Multiple Occupation and Selective Licensing of Other Residential Accommodation (England) General Approval 2010 which came into force on the 30 March 2010.

EXECUTED as a Deed by affixing)
the Common Seal of **THE LONDON**)
LONDON BOROUGH OF BRENT)
in the presence of:)

Signature

Authorised Signatory

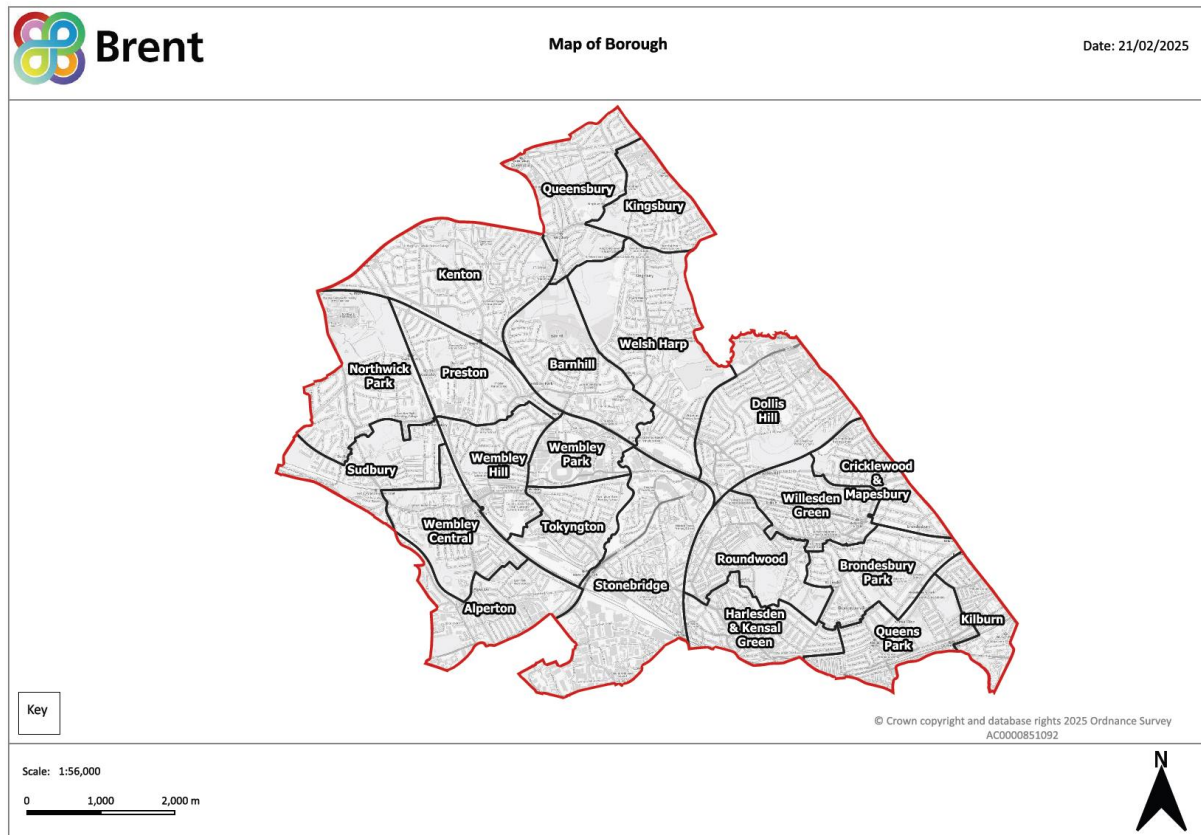
Name of Authorised Signatory (Print Name):

Date:

² Section 62 of the Act provides for certain temporary exemption. As to suitability see section 64. Note, if the house is not suitable to be licensed the Council must make an Interim Management Order - see section 10

³ Section 232 of the Act and paragraph 11 of SI 373/2006

ANNEX A – Paragraph 4: Map of Designated Area for Additional HMO Licensing



ANNEX B – Paragraph 5: HMOs subject to the designation;

(1) For the purposes of the designation a building or a part of a building is a “house in multiple occupation” if—

- (a) it meets the conditions in subsection (2) (“the standard test”);
- (b) it meets the conditions in subsection (3) (“the self-contained flat test”);
- (c) it meets the conditions in subsection (4) (“the converted building test”);
- (d) an HMO declaration is in force in respect of it under section 255 of the Act; or
- (e) it is a converted block of flats to which section 257 of the Act applies.

(2) A building or a part of a building meets the standard test if—

- (a) it consists of one or more units of living accommodation not consisting of a self-contained flat or flats;
- (b) the living accommodation is occupied by persons who do not form a single household (see section 258 of the Act);
- (c) the living accommodation is occupied by those persons as their only or main residence or they are to be treated as so occupying it (see section 259 of the Act);
- (d) their occupation of the living accommodation constitutes the only use of that accommodation;
- (e) rents are payable or other consideration is to be provided in respect of at least one of those persons’ occupation of the living accommodation; and
- (f) two or more of the households who occupy the living accommodation share one or more basic amenities or the living accommodation is lacking in one or more basic amenities.

(3) A part of a building meets the self-contained flat test if—

- (a) it consists of a self-contained flat; and
- (b) paragraphs (b) to (f) of subsection (2) apply (reading references to the living accommodation concerned as references to the flat).

(4) A building or a part of a building meets the converted building test if—

- (a) it is a converted building;
- (b) it contains one or more units of living accommodation that do not consist of a self-contained flat or flats (whether or not it also contains any such flat or flats);
- (c) the living accommodation is occupied by persons who do not form a single household (see section 258 of the Act);
- (d) the living accommodation is occupied by those persons as their only or main residence or they are to be treated as so occupying it (see section 259 of the Act);
- (e) their occupation of the living accommodation constitutes the only use of that accommodation; and
- (f) rents are payable or other consideration is to be provided in respect of at least one of those persons’ occupation of the living accommodation.

(5) But for any purposes of the designation a building or part of a building within subsection (1) is not a house in multiple occupation if it is listed in Annex C below.

References to an HMO include (where the context permits) any yard, garden, outhouses, outbuildings and appurtenances belonging to, or usually enjoyed with, it (or any part of it).

Interpretation

In Annex B —

- “basic amenities” means—

- (a) a toilet,
- (b) personal washing facilities, or
- (c) cooking facilities;

- “converted building” means a building or part of a building consisting of living accommodation in which one or more units of such accommodation have been created since the building or part was constructed;

- “enactment” includes an enactment comprised in subordinate legislation (within the meaning of the Interpretation Act 1978 (c. 30));
- “self-contained flat” means a separate set of premises (whether or not on the same floor)—
 - (a) which forms part of a building;
 - (b) either the whole or a material part of which lies above or below some other part of the building; and
 - (c) in which all three basic amenities are available for the exclusive use of its occupants.

ANNEX C – Paragraph 5(a): Buildings that are not HMOs for the purpose of the Act⁴

Buildings controlled or managed by public bodies etc⁵

1. A building where the person managing or having control of it is⁶:
 - (a) a local housing authority;
 - (aa) a not for profit registered provider of social housing;
 - (b) a body which is which is registered as a social landlord under Part 1 of the Housing Act 1996;
 - (c) a police and crime commissioner;
 - (d) the Mayor's Office for Policing and Crime;
 - (e) a fire and rescue authority, or
 - (f) a health service body within the meaning of section 9 of the National Health Service Act 2006.

- 2A. A building—
 - (a) which is social housing within the meaning of Part 2 of the Housing and Regeneration Act 2008, and
 - (b) where the person managing or having control of it is a profit-making registered provider of social housing.

Buildings controlled or managed by a co-operative society⁷

- 2B. (1) A building where—
 - (a) the person managing or having control of it is a co-operative society whose rules are such as to secure that each of the conditions set out in sub-paragraph (2) is met, and
 - (b) no person who occupies premises in the building does so by virtue of an assured tenancy, a secure tenancy or a protected tenancy.
- (2) The conditions are—
 - (a) that membership of the society is restricted to persons who are occupiers or prospective occupiers of buildings managed or controlled by the society,
 - (b) that all management decisions of the society are made by the members (or a specified quorum of members) at a general meeting which all members are entitled to, and invited to, attend,
 - (c) that each member has equal voting rights at such a meeting, and
 - (d) that, if a person occupies premises in the building and is not a member, that person is an occupier of the premises only as a result of sharing occupation of them with a member at the member's invitation.
- (3) For the purposes of sub-paragraph (1) “co-operative society” means a body that—

⁴ Schedule 14 of the Act and SI 373/2006

⁵ Paragraph 2 of Schedule 14

⁶ For the definition of “person managing” and “person having control” see section 263 of the Act

⁷ Paragraph 2B of Schedule 14

(a) is registered as a co-operative society under the 2014 Act or is a pre-commencement society (within the meaning of that Act) that meets the condition in section 2(2)(a)(i) of that Act, and

(b) is neither—

(i) a non-profit registered provider of social housing, nor

(ii) registered as a social landlord under Part 1 of the Housing Act 1996.

(4) In this paragraph—

“the 2014 Act” means the Co-operative and Community Benefit Societies Act 2014;

“assured tenancy” has the same meaning as in Part 1 of the Housing Act 1988;

“protected tenancy” has the same meaning as in the Rent Act 1977;

“secure tenancy” has the same meaning as in Part 4 of the Housing Act 1985.]

Buildings regulated otherwise than under this Act⁸

3. Any building whose occupation is regulated otherwise than by or under this Act and which is of a description specified for the purposes of this paragraph in regulations made by the appropriate national authority, including a tenancy, licence or occupation of a house which is regulated under the following enactments:

(a) sections 87, 87A, 87B, 87C and 87D of the Children Act 1989;

(b) section 43(4) of the Prison Act 1952;

(c) section 34 of the Nationality, Immigration and Asylum Act 2002;

(d) The Secure Training Centre Rules 1998;

(e) The Prison Rules 1999;

(f) The Young Offender Institute Rules 2000;

(g) The Detention Centre Rules 2001;

(h) The Criminal Justice and Court Services Act 2000 (Approved Premises) Regulations 2001;

(i) The Care Homes Regulations 2001;

(j) The Children's Homes (England) Regulations 2015; and

(k) The Residential Family Centres Regulations 2002;

Buildings occupied by students⁹

4. (1) Any building—

(a) which is occupied solely or principally by persons who occupy it for the purpose of undertaking a full-time course of further or higher education at a specified educational establishment or at an educational establishment of a specified description, and

(b) where the person managing or having control of it is the educational establishment in question or a specified person or a person of a specified description.

(2) In sub-paragraph (1) “specified” means specified for the purposes of this paragraph in regulations made by the appropriate national authority.

(3) Sub-paragraph (4) applies in connection with any decision by the appropriate national authority as to whether to make, or revoke, any regulations specifying—

(a) a particular educational establishment, or

(b) a particular description of educational establishments.

(4) The appropriate national authority may have regard to the extent to which, in its opinion—

(a) the management by or on behalf of the establishment in question of any building or buildings occupied for connected educational purposes is in conformity with any code of practice for the time being approved under section 233 which appears to the authority to be relevant, or

⁸ Paragraph 3 of Schedule 14 and schedule 1 of SI 373/2006

⁹ Paragraph 4 of schedule 14

(b) the management of such buildings by or on behalf of establishments of the description in question is in general in conformity with any such code of practice, as the case may be.

(5) In sub-paragraph (4) “occupied for connected educational purposes”, in relation to a building managed by or on behalf of an educational establishment, means occupied solely or principally by persons who occupy it for the purpose of undertaking a full-time course of further or higher education at the establishment.

Buildings occupied by religious communities¹⁰

5. (1) Any building which is occupied principally for the purposes of a religious community whose principal occupation is prayer, contemplation, education or the relief of suffering.

(2) This paragraph does not apply in the case of a converted block of flats to which section 257 applies.

Buildings occupied by owners¹¹

6. (1) Any building which is occupied only by persons within the following paragraphs—

(a) one or more persons who have, whether in the whole or any part of it, either the freehold estate or a leasehold interest granted for a term of more than 21 years;

(b) any member of the household of such a person or persons;

(c) no more than such number of other persons as is specified for the purposes of this paragraph in regulations made by the appropriate national authority.

(2) This paragraph does not apply in the case of a converted block of flats to which section 257 applies, except for the purpose of determining the status of any flat in the block.

Buildings occupied by two persons¹²

7. Any building which is occupied only by two persons who form two households.

Meaning of “building”

8. In this annex a “building” includes a part of a building.

¹⁰ Paragraph 5 of schedule 14

¹¹ Paragraph 6 of Schedule 14

¹² Paragraph 7 of schedule 14

Improving the Private Rented Sector in Brent

Additional HMO licensing proposal

Appendix 6 Scheme Objectives



Scheme objectives

Licensing is part of a broader, coordinated approach to help improve privately rented properties in Brent. In general terms, we propose to use additional licensing to continue to improve property conditions within the borough, tackle ASB and keep our residents safe. We are committed to improving property conditions and management standards in the PRS, so that it contains good quality accommodation, helps us to achieve sustainable communities and continues to contribute positively to the local economy.

The additional HMO licensing scheme will be assessed against the following scheme objectives:

Objective	Outcome
<p>1. Improve property conditions in HMO properties</p>	<ul style="list-style-type: none"> • Licensed HMO properties are inspected, monitored, and licence conditions robustly enforced and complied with • Poor housing conditions in HMOs are improved with category 1 & 2 hazards resolved (including issues such as damp and mould) • HMO properties meet a minimum band E EPC rating (unless an exemption applies) • Improved health, safety and welfare of tenants in HMOs • The council will gain increased knowledge of the PRS in the borough. This will enable targeted enforcement and support for landlords
<p>2. Improve management standards in HMO properties</p>	<ul style="list-style-type: none"> • Landlords actively manage their HMO properties or be enforced against • Absentee landlords, or landlords who are not 'fit and proper', employ an agent to actively manage their properties to ensure compliance • Prevention of overcrowding in HMOs through better management of property occupancy • Greater number of landlords become accredited improving the professionalism of landlords in the PRS • Engagement with landlords improved

Appendix 6

	Objective	Outcome
		<ul style="list-style-type: none"> • Landlords are kept informed of latest legislation and good practice • Responsible landlords will become more involved in council licensing schemes and receive information and support • Irresponsible landlords will be forced to improve their properties or be enforced against.
3.	Reduction in ASB and repeat ASB incidents in HMO properties	<ul style="list-style-type: none"> • Reduction of ASB incidents through better management of HMO properties • Reduction in ASB will improve neighbourhoods making these areas safer and more desirable places to live.
4.	Promote initiatives and provide support to maintain a clean and safe environment	<ul style="list-style-type: none"> • Reduction in repeated waste related incidences (such as fly tipping) linked to HMOs • Improvements to the overall environment, creating better living places.
5.	Increased awareness for tenants on the minimum standards to be expected in rented accommodation and of their rights and responsibilities when renting in the PRS	<ul style="list-style-type: none"> • Information for tenants on the local licensing scheme advertised and third-party support for tenants made available • Officers will support the most vulnerable tenants with their housing and wider needs e.g., benefits assessments, homelessness support • Improved tenants' support through work with third parties • Renters know their rights and responsibilities and have greater awareness of and access to council services that can support them • Tenants will see economic benefits such as reduced heating costs, bringing them out of fuel poverty.

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Improving the Private Rented Sector in Brent

Additional HMO licensing proposal

Appendix 7 – Final HMO Licence Conditions

NOTES

1. In these licence conditions:
 - “*HMO*” refers to the building or such part of it as is licensed under Part 2 of the Housing Act 2004 (The Act).
 - “*Authority*” refers to the local housing authority, namely the London Borough of Brent.
 - “*Licence Holder*” refers to: (a) the person to whom the Authority has granted this licence; and (b) from the date of his or her consent, any other person who agrees to comply with the licence restrictions and obligations that follow;
2. The following are standard conditions that will be attached to each HMO licence issued by the London Borough of Brent under Part 2 of the Housing Act 2004. In some circumstances, where the Council believes there are specific issues not covered in the standard conditions for a particular property, additional or more specific conditions will be added.
3. It is the licence holder’s responsibility to ensure that the licensed property complies with all the conditions set out in this booklet. Failure to do so may lead to prosecution for a breach of the licence conditions, a loss of the licence, and an unlimited fine per offence, or the imposition of a civil penalty charge with a maximum of £30,000 per offence.
4. The licence holder is responsible for ensuring that all licence conditions are complied with at all times whether or not a manager or another person is bound by the conditions.
5. The property licence must be displayed within a communal area of the property and a copy of the conditions should be made available to all the occupying tenants.

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CONDITIONS OF THE LICENCE

Permitted Occupation

1. Number of occupiers and households

The licence holder must ensure that the number of persons occupying the property and the maximum number of persons who may occupy each room does not exceed the maximum numbers stated on the licence.

1.1 The Licence Holder must ensure that the following minimum space standards are complied with:

- a. the floor area of any room in the HMO used as sleeping accommodation by one person aged over 10 years is not less than 6.51 square metres;
- b. the floor area of any room in the HMO used as sleeping accommodation by two persons aged over 10 years is not less than 10.22 square metres;
- c. the floor area of any room in the HMO used as sleeping accommodation by one person aged under 10 years is not less than 4.64 square metres;
- d. any room in the HMO with a floor area of less than 4.64 square metres is not used as sleeping accommodation.

1.2 The Licence Holder must ensure that:

- a. Where any room in the HMO is used as sleeping accommodation by persons aged over 10 years only, it is not used as such by more than the maximum number of persons aged over 10 years specified in the licence;
- b. Where any room in the HMO is used as sleeping accommodation by persons aged under 10 years only, it is not used as such by more than the maximum number of persons aged under 10 years specified in the licence;
- c. Where any room in the HMO is used as sleeping accommodation by persons aged over 10 years and persons aged under 10 years, it is not used as such by more than the maximum number of persons aged over 10 years specified in the licence and the maximum number of persons aged under 10 years so specified.

1.3 The licence holder must take the necessary steps to rectify the breach

within the specified period, where:

- a. any of the Licence conditions imposed above have been breached in relation to the HMO,
- b. the licence holder has not knowingly permitted the breach, and
- c. the local housing authority have notified the licence holder of the breach,

The specified period means the period, of not more than 18 months beginning with the date of the notification, which is specified in the notification.

In this section above;

- a. A reference to a number of persons using a room in an HMO as sleeping accommodation does not include a person doing so as a visitor of an occupier of the HMO.
- b. A room is used as sleeping accommodation if it is normally used as a bedroom, whether or not it is also used for other purposes.
- c. Any part of the floor area of a room in relation to which the height of the ceiling is less than 1.5 metres is not to be taken into account in determining the floor area of that room for the purposes of this paragraph.
- d. This paragraph does not apply to an HMO which is managed by a charity registered under the Charities Act 2011 and which:
 - (i) is a night shelter, or,
 - (ii) consists of temporary accommodation for persons suffering or recovering from drug or alcohol abuse or a mental disorder

2. Time for compliance with conditions

Note: This applies if the first licence, concerning a HMO, is granted on or after 1st October 2018.

If the local housing authority has notified the Licence Holder, at the time the licence is granted, that the licence holder is not complying with one or more of the conditions imposed under 1.1 and 1.2 above, the licence holder is required to comply with the condition or conditions within the period specified. This period specified by the authority must not exceed 18 months from the date of the notification.

3. Amenity and space (size of rooms) standards

The licence holder must ensure that the number of occupiers and households

allowed to occupy the property will relate to the amenities that are provided within the property and the size and layout of the rooms available as decided by the Council at the time of licence approval.

[For further information on Brent Councils Amenity and Space Standards see Appendix 1 below, pages 23-27].

Tenancy Management

4. Terms of occupation

The licence holder must supply to the occupiers of the HMO a written statement of the terms on which they occupy the property (this is usually a tenancy or licence agreement).

The licence holder must provide a copy to the Council within 14 days on demand.

5. Tenant references

The licence holder must demand references from persons who wish to occupy the HMO.

No new occupiers should be allowed to occupy the property if they are unable to provide a suitable reference. When referencing consideration must be given to the tenant's history, credit and right to rent checks.

The licence holder must provide evidence of such reference and checks carried out when requested by the Council within 14 days on demand.

6. Rent payments

The licence holder must protect any deposits taken from the occupiers under an assured short hold tenancy agreement by placing them in a statutory tenancy deposit scheme.

Information about the scheme being used must be given to the occupier at the time the deposit is taken. When requested this information must be provided to the Council within 14 days on demand.

The licence holder must ensure that there is a record of all rent payments received in respect of the property. Evidence of rent records must be provided to the Council within 14 days on demand

7. Deposits

The licence holder must protect any deposits taken from the occupiers under an assured short hold tenancy agreement by placing them in a statutory tenancy

deposit scheme.

Information about the scheme being used must be given to the occupier within 30 days of the time the deposit is taken. When requested this information must be provided to the Council within 14 days on demand.

8. Complaints

The Licence Holder must ensure that all tenants are given a suitable written complaints procedure at the start of their tenancy.

The procedure must include how complaints of the property conditions will be handled.

9. Anti-social behaviour (ASB)

The licence holder must take reasonable and practical action to prevent or reduce anti-social behaviour by the occupiers of the property or their visitors.

The licence holder must ensure that the occupiers of the property receive written confirmation detailing the procedure in place to deal with anti-social behaviour at the start of their tenancy. Please refer to 12a and 12b below.

[For further information on what the Council considers to be anti-social behaviour see useful information below].

9a. Prevention

To help prevent anti-social behaviour occurring the licence holder must:

- i. Obtain tenant references prior to granting a tenancy as to their previous conduct, and be satisfied that they are not likely to cause any anti- social behaviour.
- ii. Ask anyone wishing to occupy the property to disclose unspent criminal convictions. If unspent criminal convictions are disclosed the licence holder must consider if those convictions indicate a risk that the person is likely to commit acts of anti-social behaviour, before granting a tenancy.
- iii. Respond to any reference requests received for a current or former tenant from another licence holder in writing within 21 days.
- iv. When giving a reference state whether or not they are aware of any allegations of anti-social behaviour made against the tenant. If allegations have been made, they must give details, to the best of their knowledge, of whether the allegations have been admitted or have been found proven in any court or tribunal.
- v. Make, a minimum of quarterly inspections of the property to ensure that it is in a decent state of repair and that the occupiers are not in breach of tenancy terms and conditions.
- vi. Ensure that all tenants are aware that if they or their visitors behave in a way that the licence holder, manager or Council considers to be anti-

social they may face eviction.

9b. Action

This is a procedure to be followed if or when a landlord has been made aware of the occurrence of anti-social behaviour. For the purpose of transparency, this process should be made available to tenants at the start of their tenancy agreement.

The licence holder must cooperate with the Council, the Police Service and any other agencies in resolving complaints of anti-social behaviour.

The licence holder should address problems of anti-social behaviour resulting from the occupiers or their visitors by following the procedure set out below:

- i. If a complaint is received, or anti-social behaviour is discovered, the licence holder must contact the tenant within 14 days. The tenant must be informed in writing of the allegations made against them and of the consequences of its continuation.
- ii. The licence holder shall monitor any allegations of anti-social behaviour for a period of 28 days, from the date the complaint was received.
- iii. If after 28 days it is found that the anti-social behaviour is still continuing, the licence holder must visit the premises within 7 days and provide the tenant with a warning letter advising them of the possibility of eviction if their behaviour continues.
- iv. If after 14 days of giving a warning letter the tenant has not taken steps to address the anti-social behaviour and it is still continuing, the licence holder shall take action which may include legal eviction proceedings.
- v. The licence holder must ensure that written notes are kept of any meetings, telephone conversations or investigations regarding anti-social behaviour for 3 years and if requested by the Council, provide this information within 28 days on demand.
- vi. Any letters, relating to antisocial behaviour sent or received by the licence holder, must be kept for 3 years by the licence holder and if requested by the Council, provide copies of them within 28 days on demand.
- vii. Where the licence holder or his agent has reason to believe that the anti-social behaviour involves criminal activity, the licence holder shall inform the appropriate authorities.

Property Management

10. Gas

If gas is supplied to the HMO, the Licence Holder must produce to the local housing authority annually for their inspection a gas safety certificate obtained in respect of the HMO within the last 12 months.

If gas is supplied to the property, the licence holder must ensure that the gas installation and appliances are tested annually by an approved Gas Safe engineer. Within 14 days of the licence holder being notified by the Council of any safety risk, a new Gas Safe certificate must be submitted to the Council.

The licence holder must provide to the Council, a current Gas Safe Certificate within 14 days on demand.

11. Electrical Appliances

The licence holder is responsible for the maintenance and safety of all supplied electrical appliances and must ensure:

- a. Electrical appliances are safe and in good working order. A declaration as to their condition must be provided at the point of application.
- b. Test reports on the condition of the electrical appliances in the property must be provided to the Council within 14 days on demand.
- c. All electrical equipment supplied by the landlord must be safe to use. Portable Appliance Test (PAT) report must be provided to the Council within 14 days on demand.

12. Furniture and Furnishings

The Licence holder must keep furniture made available by him in the HMO in a safe condition and comply with the Furniture and Furnishings (Fire) (Safety) Regulations 1988.

The Licence Holder must supply the authority, within 14 days on demand, with a declaration by him as to the safety of such furniture.

13. Heating and Insulation

The Licence Holder must provide an adequate and efficient fixed heating system with adjustable controls, which is capable of maintaining an indoor temperature of at least 21°C in habitable rooms.

14. Security

The Licence holder is responsible for the security of the property and must ensure:

- a. The access to the property such as locks, latches and entry systems are maintained and in good working order at all times.
- b. The front door of the property is fitted with a mortice lock (thumb turn) or equivalent, to a five-lever security level.

- c. Where window locks are fitted, the keys are provided to the relevant occupants.
- d. Where a burglar alarm is fitted to the property, the occupiers are informed in writing about the circumstances under which the code for the alarm can be changed, and are given details on how this can be arranged.
- e. Where previous occupants have not returned keys, the relevant locks will be changed prior to new occupants moving in.

15. Common Parts (shared areas)

The Licence holder must ensure that:

- a. The common parts in the premises are kept free from obstruction, in a clean condition and in good order and repair.
- b. Common areas, including shared living rooms, kitchens, and hallways are not used for sleeping by tenants or their guests.
- c. Smoking is not permitted in any common area and 'no smoking' signs are clearly displayed (Health Act 2006).

For the purposes of this condition "common parts" means—

- (i) the entrance door to the HMO and the entrance doors leading to each unit of living accommodation within the HMO; and
- (ii) all such parts of the HMO as comprise staircases, lifts, passageways, corridors, halls, lobbies, entrances, balconies, porches and steps that are used by the occupiers of the units of living accommodation within the HMO to gain access to the entrance doors of their respective unit of living accommodation.

16. External areas

The licence holder, **within their legal responsibilities** must ensure that:

- a. The exterior of the property including the roof, walls, drainage, window and door elements are maintained in a reasonable decorative order and state of repair.
- b. Gardens, fencing, paths, etc., and other external elements are kept in a clean, clear and/or sound condition.
- c. Outbuildings such as garages, sheds are properly maintained and are not used for sleeping purposes

17. Refuse and waste

The Licence Holder must comply with the Councils policy on the storage and disposal of waste at the HMO pending collection. In addition, the Licence holder must;

- a. Ensure that there are adequate arrangements for the storage and disposal of waste.
- b. Ensure that the occupiers of the HMO are given the information in writing about waste and recycling within 7 days of the start of their occupation:
- c. Ensure that a sufficient number of suitable external rubbish bins for the occupiers to dispose and recycle waste.
- d. Ensure that any kind of refuse which the Council will not ordinarily collect (e.g. large items of bedding, furniture, hazardous waste etc.) are disposed of responsibly and appropriately.
- e. Actively respond to complaints of poor waste practices associated with the property. The Licence holder must keep a record of the action taken and provide this to the Council within 14 days on demand.

Information on Recycling and waste can be found at

<https://www.brent.gov.uk/services-for-residents/recycling-and-waste/>

18. Repairs

The Licence Holder must ensure that:

- a. All occupants of the HMO receive written confirmation detailing arrangements in place to deal with repairs. If requested, this must be provided to the Council within 14 days on demand.
- b. Disrepair and/or defects identified to the landlord by the Council are investigated and adequately addressed within the specified timeframes as may be stipulated by the Council.
- c. All repairs to the property or any installations, facilities or equipment within it are carried out by competent and reputable persons.
- d. They respond positively and within the specified time period given to any mandatory housing related enforcement notices, issued by the Council.
- e. Whilst any works are in progress, the work is carried out to ensure the safety of all persons occupying or visiting the premises.
- f. On completion of any works, the property is left in a clean and tidy

condition.

19. Compliance Works

The Licence holder must ensure that any works found to be necessary by the Council to ensure that the property complies with the Council's standards for HMOs, are carried out within the specified time period given.

20. Pest Control

The Licence holder is responsible for ensuring that the property, including external areas such as gardens, are free from pest infestation e.g. rodents. Any pest infestations must be managed effectively and within a period of 7 days of being reported. Records of treatment and management must be kept and copies of these must be provided to the Council within 14 days on demand.

Fire Safety

21. Smoke Alarms and Carbon Monoxide Alarms

21(1) Smoke alarms

The licence holder must ensure that:

- a. A smoke alarm is installed on each storey of the HMO on which there is a room used wholly or partly as living accommodation; and that,
- b. Each such alarm is kept in proper working order; and that,
- c. On demand, the Authority is supplied with a declaration by him or her as to the condition and positioning of any such alarms.

When considering what smoke alarm installation may be appropriate, hard wired mains operated smoke alarms with battery back-up to BS 5446 should be provided.

For the purpose of Condition 21(1), a bathroom or lavatory is to be treated as a room used as living accommodation.

21(2) Carbon Monoxide Alarms

The Licence Holder must ensure that:

A carbon monoxide alarm is installed in any room in the HMO which is used wholly or partly as living accommodation and contains a fixed combustion appliance other than a gas cooker; and that,

Any such alarm is kept in proper working order; and that

The Authority is, on demand, supplied with a declaration by him or her as to the condition and positioning of any such alarm or alarms.

For the purpose of Condition 21(2) “room” includes a hall or landing, and a bathroom or lavatory is to be treated as a room used as living accommodation.

22. Fire precautions

The licence holder must ensure that all fire precautions provided to the property, e.g. fire doors, automatic fire alarm and emergency lighting system(s), etc. are maintained in full working order at all times.

Where the HMO is of a type which falls under the remit of the Fire Safety Order, the licence holder must ensure that a fire risk assessment as required under The Regulatory Reform (Fire Safety) Order 2005 is carried out by a competent person.

23. Servicing and testing of systems and equipment

The licence holder must ensure that all fire detection systems, means of escape and fire- fighting equipment installed in the property must be annually serviced by a registered qualified person and be maintained and tested in accordance with the manufacturer's instructions. A new test/servicing report must be provided to the Council on demand within 14 days of any identified damage or Disrepair being notified to the landlord by the Council.

24. Electricity supplies and fire safety

The licence holder must ensure that electricity supplies to fire detection and emergency lighting systems are not disconnected, or threatened with disconnection, due to non-payment of monies owed to the relevant provider.

25. Doors

The licence holder must ensure that the main entrance/exit doors and all unit doors leading to common areas are openable from the inside without the use of a key.

26. Fire routine

The licence holder should ensure that all residents are fully aware of the procedures to be followed in the event of a fire.

They should also ensure that the fire routine notice detailing action to be taken in the event of fire, is clearly worded and displayed in a central location e.g. next to the main entrance/exits **or a copy of the fire procedure is provided to each tenant at the start of their tenancy.**

For larger HMOs i.e. 5 or more occupiers and/or high-risk HMO with a complex layout, the fire procedure signs must be displayed

27. Fire blankets

The licence holder must ensure that a fire blanket conforming to current British standards is provided in each kitchen.

28. Means of escape

The licence holder must ensure that all means of escape from fire are free from obstruction and fire precautions are maintained.

29. Compliance with fire safety guidance

The licence holder must ensure that all means of escape from fire are free from obstruction and that adequate fire precautions are maintained.

In determining adequate fire precautions reference should be made to the LACoRS guidance: *HOUSING – FIRE SAFETY, Guidance on fire safety provisions for certain types of existing housing*

N.B. where the fire safety provisions in place are below the LACoRS recommended standard, the Council must be notified of any amendments/alterations.

[For further information on LACoRS, see the 'Useful Information' page 22 below].

30. Electrical Installations

The licence holder must ensure that:

Every electrical installation in the house is in proper working order and safe for continued use; and that

The Authority is, on demand, supplied with a declaration by him or her as to the safety of such installations;

The Licence Holder must supply a current (i.e. within the previous 5 years) Domestic Electrical Installation Periodic Report for the whole of the electrical installations to the Council within 28 days of demand.

All recommendations for urgent attention and improvement (Codes 1 and 2) must be carried out within 28 days of the report.

For the purposes of condition 30 “electrical installation” has the meaning given in regulation 2(1) of the Building Regulations 2010.

General

31. Consultation of Changes

The licence holder must consult with the Council before making changes to the layout of the property, amenity provisions (such as adding or removing bathroom or kitchen facilities), fire precautions or occupation of the accommodation.

32. Notification of changes of circumstances

The licence holder must inform the Council of:

- a. Details of any unspent convictions not previously disclosed to the Local Authority involving fraud or dishonesty, violence or drugs, any offence listed in Schedule 3 to the Sexual Offences Act 2003 or any other conviction relevant to the licence holder and/or the property managers fit and proper person status.
- b. Details of any finding by a court or tribunal against the licence holder and/or the manager that they have practiced unlawful discrimination on the grounds of sex, colour, race, ethnic or national origin or disability.
- c. Details of any civil or criminal proceedings against the licence holder or manager, relating to housing, public health, environmental health or landlord and tenant law, resulting in a judgment or finding being made against them.
- d. Information about any property the licence holder or manager owns or manages or has owned or managed, that has been refused a licence by a local housing authority or has had a licence revoked due to the breaching of the licence conditions.
- e. Information about any property the licence holder or manager owns or manages or has owned or managed that has been the subject of an interim or final management order under the Housing Act 2004.
- f. The property becoming empty for more than 3 months.
- g. Notification of repossession/foreclosure.
- h. Successful claims against the licence holder for default of tenancy deposits.
- i. A change in managing agent or the instruction of a managing agent.
- j. The undertaking of substantial works to the property, including conversions and modernisation or emergency problems relating to fire, flood or disaster.

33. Absence of the Licence Holder

The licence holder is required to have in place suitable emergency management arrangements in the event of their absence. These details must be given to the occupiers and displayed in a prominent place in a common area, preferably near to the entrance door.

Should the Licence Holder be unable to fulfil the licence conditions he should appoint a person to manage the HMO during the period of the licence, he must:

- a. Obtain from the manager a signed declaration identifying the licence conditions by which he agrees to be bound, and that the he manager understands the consequences of failing to comply with the licence conditions;
- b. Provide the Council a copy of the signed declaration within 14 days of the said change of circumstance.

34. Compliance inspections

The licence holder must arrange for access to be granted when requested by the Council at any reasonable time.

The Licence Holder must ensure that council officers are not obstructed from carrying out their statutory duties including inspecting and the surveying of the property to ensure compliance with licence conditions and relevant legislation.

35. Training

The licence holder and/or manager may be required by the Council to attend an accredited management training course, in the event of significant and/or continuous deficiencies in the supervision and/or maintenance of a licensed HMO being identified by the Council.

[For contact details on Brent Councils approved course; London Landlord Accreditation Scheme, refer to the useful information section]

Documents to be displayed

36. Within the property

The following documents should be displayed in a prominent position in a common area, preferably near the entrance door:

- a. A copy of the licence (incorporating where the licence conditions can be viewed).
- b. A Copy of the current Gas Safety Certificate.

- c. The name, address and telephone number (including an emergency contact number, if different) of the Licensee and/or Manager of the premises.
- d. Energy Performance Certificate(s) (EPC) carried out for new tenancies.

37. Licensing and Management Regulations

All licensing conditions shall be read in conjunction with the relevant provisions of the:

- a. Management of Houses in Multiple Occupation (England) Regulations 2006
- b. Licensing and Management of Houses in Multiple Occupation and other houses (Miscellaneous Provisions) (England) Regulations 2006
- c. The Licensing and Management of Houses in Multiple Occupation (Additional Provisions) (England) Regulations 2007.

[END OF CONDITIONS]

USEFUL INFORMATION

1. Definition of terms

- a) "*HMO or house*" refers to the building or such part of it as is licensed under Part 2 of the Housing Act 2004;
- b) "*Licence Holder*" refers to: (a) the person to whom the Authority has granted this licence; and (b) from the date of his or her consent, any other person who agrees to comply with the licence restrictions and obligations that follow.
- c) "*Mandatory Licence Conditions*" refers to conditions that the Authority is obliged to impose under any licence granted under Part 2 or Part 3 Housing Act 2004 by virtue of Schedule 4 of Housing Act 2004.
- d) "common parts" means:
 - (i) the entrance door to the HMO and the entrance doors leading to each unit of living accommodation within the HMO; and
 - (ii) all such parts of the HMO as comprise staircases, lifts, passageways, corridors, halls, lobbies, entrances, balconies, porches and steps that are used by the occupiers of the units of living accommodation within the HMO to gain access to the entrance doors of their respective unit of living accommodation.

2. Anti-social behaviour

For the purposes of the Housing Act 2004, antisocial behaviour means conduct on the part of occupiers of, or visitors to, residential premises.

(a) Which or is likely to cause a nuisance or annoyance to persons residing, visiting or otherwise engaged in lawful activities in the vicinity of such premises, or

(b) Which involves or is likely to involve the use of such premises for illegal purposes.

Examples of include:

Crime: tenants engaging in vandalism, criminal damage, burglary, robbery/ theft and car crime

Nuisance neighbours: Intimidation and harassment; noise, rowdy and nuisance behaviour; animal related problems; vehicle related nuisance. Tenants engaged in begging; antisocial drinking; street prostitution and kerb-crawling; street drugs market within the curtilage of the property.

Enviro-crime: tenants engaged in graffiti and fly-posting; fly-tipping; litter and waste; drugs paraphernalia; fireworks misuse in and around the curtilage of the property.

London Borough of Brent – Anti-social Behaviour Team. Tel: 020 8937 2000

3. The London Landlord Accreditation Scheme (LLAS)

A partnership of landlord organisations, London Councils and university accommodation units who have worked together to set up a development programme which will provide you with the information necessary to improve your business.

www.londonlandlords.org.uk/accreditation

Tel: 020 7974 1970

4. The Electrical Safety Council

The Electrical Safety Council is an independent charity committed to reducing deaths and injuries through electrical accidents at home and at work. They are supported by all sectors of the electrical industry as well as local and central government and work to promote safety and good practice.

<http://www.esc.org.uk>

Tel: 0870 040 0561

5. Gas safety

The Health and Safety Executive website provides guidance in relation to gas safety. By law you must repair and maintain gas pipework, flues and appliances in safe condition, ensure an annual gas safety check on each appliance and flue, and keep a record of each safety check.

www.hse.gov.uk/gas/landlords/index.htm

6. Tenants Deposit Protection

The Tenancy deposit must be placed in a government-backed tenancy deposit scheme (TDP) if you rent on an assured short hold tenancy that started after 6 April 2007. In England and Wales your deposits can be registered with:

- Deposit Protection Service
- MyDeposits, or
- Tenancy Deposit Scheme

<https://www.gov.uk/tenancy-deposit-protection>

Tel: 020 702 0003

7. MHCLG – The Ministry of Housing, Communities and Local Government.

<https://www.gov.uk/government/organisations/department-for-communities-and-local-government>

8. LACoRS (Local Authorities Coordinators of Regulatory Services) Fire Safety Guidance.

www.lacors.gov.uk

Appendix 1

The Council HMO amenities and space standards are provided as guidance. These standards will be applied in deciding the suitability of the HMO at the time of the licence approval and its compliance.

Advice regarding bedroom sizes

- i. Single occupancy; minimum of 6.5m² where provided with separate shared kitchen, minimum of 10.2m² where a room contains kitchen facilities.
- ii. Two persons' occupancy; minimum of 10.2m² where provided with separate shared kitchen, minimum of 13.9m² where a room contains kitchen facilities.
- iii. The standard is to be applied irrespective of the age of the occupants.
- iv. The floor area taken up by a solid chimneybreast should be discounted.
- v. All floor space taken up by en-suite bathroom/shower facilities should be discounted.
- vi. No account should be taken of entrance lobbies where the room door opens into a lobby/corridor which is less than 1200mm in width.
- vii. Single rooms should have a minimum width of 1.8m.
- viii. Rooms which are to accommodate two persons should have a minimum width of 2.3m.
- ix. Sharing of rooms shall be avoided unless the individuals concerned consent to share the room.
- x. No persons of the opposite sex who are aged 12 years or over shall share a room unless they are living together as partners.
- xi. Irrespective of the floor area, consideration shall be given to the shape and useable living space within the room to determine whether it is suitable for occupation and to what occupancy level.
- xii. All rooms must have a minimum floor to ceiling height of at least 2.14 metres over not less than 75% of the room area.
- xiii. Any floor area where the ceiling height is less than 1.53 metres shall be disregarded.
- xiv. No staircase or landing nor any room which has been appointed as a

kitchen or bathroom shall be deemed suitable for sleeping accommodation.

Advice regarding kitchen facilities in HMOs

Kitchens for Communal Use

Where the Local Authority is satisfied that the provision of kitchen facilities for exclusive use is not practicable or appropriate, facilities may be provided on a ratio of one set of facilities to every three households or every five persons, normally whichever is the smaller and being irrespective of age.

The kitchen should be not more than one floor distance from any individual letting unless a suitable communal dining area is also provided (adjacent to kitchen).

There shall be no more than two sets of facilities in any one room.

EACH SET of facilities shall meet the following minimum standards:

Cooking Gas or electric cooker with four burners/hobs, oven and grill.

Sink: Stainless steel sink and integral drainer (minimum size 1000mm x 600mm), set on a base unit.

The sink is to be provided with a constant supply of hot and (potable) cold water and properly connected to the drainage system via a suitable trap.

A tiled splash back (minimum 300mm high) shall be provided to the sink and drainer.

[A wash hand basin is not a suitable alternative to a sink.]

Storage Lockable storage cupboards, minimum capacity 0.3m³
e.g. 600mm wide x 720mm high x 600mm deep for each single bedroom and
0.4m³ e.g. 1000mm wide x 720mm high x 600mm deep for a two-person
household whose occupants use the kitchen.

[In calculating the required provision of storage cupboards, base unit cupboards below sinks/drainers should be discounted.]

Preparation A suitable worktop or table of smooth and impervious material of minimum size 1000mm x 600mm.

Two double outlet 13-amp electrical power sockets to be situated above the work surface at a convenient height and in a safe position.

These are in addition to any power outlets serving major appliances.

In addition, a refrigerator of minimum capacity 0.15m³ should be provided within

each occupancy.

Other general requirements for kitchen facilities

All kitchens and kitchen areas are to be provided with an adequate provision for artificial lighting.

All kitchens and kitchen areas are to be provided with adequate ventilation.

This may be obtained by being ventilated directly to the external air by a window with an openable area of at least 1/20th of the floor area. However, where this is not practicable mechanical ventilation providing a minimum of one air change per hour shall be provided.

Such an installation shall be fitted with an over run device for a minimum of 20 minutes and be connected to the lighting circuit of the room.

A kitchen containing one set of facilities should be a minimum floor area of 5.5m² and a kitchen containing two sets of kitchen facilities should be a minimum of 11m².

Where two sets of cooking facilities are provided in a kitchen, the two sets of facilities (i.e. cooker, sink & worktop) shall be reasonably separate from each other to allow their safe and simultaneous use by two or more households.

Cookers should be located remote from doorways, and there should be enough floor space for items to be retrieved from the oven and for the safe circulation of occupants generally.

Sinks, worktops and immediately adjacent walls and floors should be non-porous and reasonably smooth so as to facilitate cleaning.

[Kitchens must NOT be installed in any hallway, corridor or lobby and no bedroom should be accessed via a kitchen unless a suitable alternative means of escape (in case of fire) can be provided from that occupancy.]

Where separate communal living/dining room(s) provided, there should be a minimum floor area of – 11.0m² for 1 to 5 persons - 16.5m² for 6 to 10 persons.

Advice regarding sanitary facilities

One water closet shall be provided and maintained for (a maximum of) every five persons or lesser number irrespective of age.

Each such water closet shall be in a separate room within the building and when shared by two or more households, be entered from a common passageway or hallway and shall not be more than one floor distance from any individual letting.

Each W.C. compartment shall also be provided with a suitable wash hand basin supplied with a constant supply of hot and cold water and a splash back.

Any bathroom, shower room or compartment containing a W.C. should be separated from any space used for the preparation of food.

Although an intervening lobby is not essential, the W.C. compartment should not open directly onto the area of a kitchen immediately adjacent to where food is prepared, especially in the case of shared amenities.

Not less than fifty percent of water closets shall be provided in separate compartments from the bath/shower facilities. These compartments should have minimum dimensions of 1300 mm x 800mm.

All bath/shower rooms are to be provided with an adequate provision for artificial lighting.

All bath/shower rooms are to be provided with adequate ventilation. This may be obtained by being ventilated directly to the external air by a window with an openable area of at least 1/20th of the floor area.

However, where this is not practicable mechanical ventilation providing a minimum of three air change per hour shall be provided. Such an installation shall be fitted with an over run device for a minimum of 20 minutes and be connected to the lighting circuit of the room.

The surfaces any water closet compartment should be reasonably smooth, non-absorbent and capable of being readily cleansed.

The water closet compartment shall be constructed so as to afford privacy to the user

External water closets are not acceptable.

The HMO shall be provided with an effective system, both above and below ground for the drainage of foul, waste and surface water.

Personal washing facilities

Each occupancy shall be provided where practicable with a separate bath or shower. Where this is not practicable one bath or shower shall be provided and maintained for (maximum of) every five persons or lesser number irrespective of age.

Each washing facility shall be provided not more than one floor distance from any user.

Each bath shall be of minimum dimensions 1700mm x 700mm and each shower

shall have minimum dimensions of 800mm x 800mm.

Each bath shall be situated in a separate bathroom of adequate size (minimum dimensions 1700mm x 1400mm).

Each shower shall be situated in a suitable shower room (minimum dimensions 1600mm x 900mm).

Each separate bath/shower room shall be provided with a suitable wash hand basin (minimum dimensions 500mm x 400mm), together with constant supplies of hot and cold running water. A tiled splash back (minimum 300mm high) is to be provided to each wash hand basin.

Each bath and shower shall be provided with a constant, freely available supply of hot and cold water. A tiled splash back (minimum 300mm high) shall be provided to all baths.

Any shower cubicles should have fully tiled walls or be complete self- standing cubicles.

Showers shall be provided with a suitable water resistant shower curtain or door to the cubicle.

The hot and cold water supplies to all washing facilities shall be adequate, constant and available.

The bath/shower shall be accessible at all times.

The surfaces of any bathroom or shower room should be reasonably smooth, non-absorbent and capable of being readily cleansed. In addition, flooring should be non-slip.

Shared amenities are to be accessible from a common area.

All bath/shower rooms are to be provided with an adequate provision for artificial lighting.

All bath/shower rooms are to be provided with adequate ventilation. This may be obtained by being ventilated directly to the external air by a window with an openable area of at least 1/20th of the floor area.

However, where this is not practicable mechanical ventilation providing a minimum of three air change per hour shall be provided.

Such an installation shall be fitted with an over run device for a minimum of 20 minutes and be connected to the lighting circuit of the room.

Improving the Private Rented Sector in Brent

Additional HMO licensing proposal

Appendix 8 – Schedule of Proposed Fees, Charges and Discounts

Section 63 of the Housing Act 2004 allows the Council to require that the licence application to be accompanied by a fee fixed by the authority. The HMO licensing fees are set to cover the cost of administering the licensing schemes functions (administration and enforcement) under the Housing Act 2004. The legal requirement is that fees are split in two parts, however, applicants have the option of making the full payment at the time of making the application. As with our existing licensing schemes the grant of a licence will be subject to the payment of the full fee.

The proposed licence fee has been set using assumptions about the level of income the fees will generate, based on the number of properties that we expect to be licensed during the life of the schemes, the activities involved. Staffing and other resources necessary to administer, run and enforce the scheme been included to calculate the overall cost of licensing. Our fees will be kept under review.

A £40.00 discount per property application is proposed if the property licence holder or managing agent is accredited to the London Landlord Accreditation Scheme (LLAS).

Licences will normally be granted for the duration of the scheme (up to 5 years). Where we have concerns about the management and use or occupation of the property, we may grant a licence for a shorter period, usually for 1 year. A typical example will be where the application processing stage indicates a breach of a mandatory condition. The reason for a shorter period will always be given with the Housing Act 2004, schedule 5 notices proposing to grant, and granting the licence.

We propose an increase from the current £840.00 HMO licensing fee as set out in the schedule proposed fees and associated charges below:

1. Proposed HMO licence application fee

Scheme	Full Fee	Detail	Part 1 Fee on Application (non- refundable)	Part 2 Fee on Grant of Licence
Mandatory HMO	£1040.00	Application, processing and inspection of up to 5 habitable rooms (lounge, dining room or bedroom)	£540.00	£500.00
	£25.00	For each additional habitable room an additional charge per room of....		
Additional HMO	£1040.00	Application, processing and inspection of up to 5 habitable rooms (lounge, dining room or bedroom)	£540.00	£500.00
	£25.00	For each additional habitable room an additional charge per room of....		

2. Discount

Appendix 8

Details	Discount
Landlord Accreditation Scheme Membership off new (First time) applications. The discount is applied to the 2 nd part fee payment.	£40 per property application

3. HMO licence renewal application fee

Scheme	Full fee	Details	Part 1 Fee on Application (non-refundable)	Part 2 Fee on Grant of Licence
HMO	£940.00	Where an applicant makes a declaration to confirm no changes to circumstances or property since 1st application and the application is made before the expiry of the existing licence.	£500.00	£440.00

4. Additional charges associated with the application process

Council assistance provided to complete an application.	Fee
For those applicants that are not able to complete an online application form the Council will offer an assisted service. This will enable you to make an application by telephone or by coming into Brent's Civic Centre, by appointment, and we will help you complete the form online.	£100.00

5. Other fees and charges

Action	Fee or charge
Taking a licence back (revocation)	None
Application to licence after one has been taken away	Initial application fee
Applicant withdraws application	Initial application fee with no refund
Mistaken application (see refund policy)	Refund
Temporary Exemption Notice (TEN) made by the council or granted	No fee
Application received following the expiry of a Temporary Exemption Notice (TEN) made by the council	Initial application fee

Change of licence type – e.g., if a single dwelling (selective) is re-let or become occupied as a House in Multiple Occupation or a change from an HMO licence to a selective licence	New application fee
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5. Licence variation fees

These fees are applicable where the property is already licensed.

Proposed variation to the licence	Fee
Change of details of any existing licence holder, manager, owner, mortgagor, freeholder or leaseholder	None
Change of mortgagor, owner, freeholder and leaseholder (unless they are also the licence holder or manager)	None
Reduction in the number of occupiers and/or households for licensing purposes	None
Variation of licence started by the council	None
Change of manager (unless they are also the licence holder)	None
A larger number of occupiers and/or households for licensing purposes through increasing the number or size of rooms, and/or amenity provision (unless there is a change of licence type - from Selective to Additional or mandatory HMO)	None
Change of the existing licence holder	A new application plus fee must be made

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Additional HMO Licensing Scheme 2025
DEPARTMENT:	Residents and Housing Services
TEAM:	Private Housing Services
LEAD OFFICER:	Spencer Randolph, Director of Housing Services Email: Spencer.Randolph@brent.gov.uk
DATE:	24 September 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 proposes to introduce a new borough-wide additional HMO licensing scheme that would come into force on 02 February 2026.

In February 2020, the Council introduced a boroughwide additional HMO licensing scheme to ensure safety standards for tenants living in smaller houses in multiple occupation (HMOs), this scheme ended in January 2025. This scheme followed a previous scheme, which was introduced in January 2015 and expired in 2020. The schemes covered HMOs that are occupied by three or four people living in two or more households. The schemes excluded those licensed through the mandatory HMO licensing scheme.

Property licensing provides an additional legislative framework to regulate conditions and practices in the private rented sector. Through conditions attached to granted property licences, licence holders must comply with a set of conditions relating to the letting and management of their privately rented homes.

HMOs present a higher level of risk to occupants, and this is elevated where properties are poorly managed. The current additional HMO licensing scheme has helped us improve the standards and management practices of many HMOs across the borough. However, the evidence shows that there is a significant number of properties that are still substandard and potentially dangerous. These HMOs pose a risk to the health, safety, and wellbeing of tenants, cause problems for neighbours, and require significant intervention from Council enforcement services.

While we have seen significant improvements from the scheme that ended in January 2025, we believe that a further additional HMO licensing scheme is necessary to continue the work we have achieved and to maintain and improve the management of HMOs in the borough.

Since the introduction of the additional HMO licensing scheme, the Council has granted more than 2500 licences, meaning that over 5000 households are living in safer, more

secure accommodation as a result. The introduction of a new additional HMO licensing scheme would allow for seamless continuity of the work already carried out in regulating, improving housing conditions and promoting better management standards within HMOs.

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

The main group of people affected by the proposal are the tenants of privately rented homes in the borough, which make up about 36% of Brent's households. The overall impacts of the additional HMO licensing scheme, should it be introduced, should provide improved living conditions for private tenants, specifically those living in HMOs, and wider benefits for the borough's other residents.

2021 Census data remains the most up-to-date available data to assess the numbers and proportions of people of different sexes, ages, disabilities, races and religion/beliefs who live in rented accommodation in Brent and are most likely to be impacted upon by the introduction of this licensing scheme. Unfortunately, the categorisation of census variables makes it difficult to separate out those living in private rented accommodation from those who are living rent free. However, the numbers living rent-free are very small and unlikely to have a significant impact on the figures.

Data from the 2021 census indicates that people who rent from a private landlord in Brent are broadly representative of Brent's population, although some groups are over or underrepresented. Where these groups overlap with the protected characteristics described in the Equality Act 2010, the comparative data is outlined in Section 3 – Equality Analysis.

Other persons/groups affected by the proposals are:

- Other residents of the borough who do not rent from a private landlord
- Landlords/agents of the privately rented homes
- Residents of homes immediately outside the proposed licensing scheme designation areas

The service does not have access to data regarding the prevalence of one or more protected characteristics of landlords and agents who specifically let properties in Brent. However, according to the English Private Landlords Survey 2024¹, the national profile of landlords includes the following characteristics:

- Landlords are as likely to be male as female, though male landlords tend to have larger portfolios than female landlords
- The median age of individual landlords is 59 years old. This is older than the general population. Almost two thirds (64%) of landlords are aged 55 or older
- The ethnicity of landlords broadly reflects that of the population as a whole, though Census 2021 data shows a smaller proportion of the wider population identified as white (81% compared to landlords at 87%)
- Around one in five (21%) of landlords had a total annual gross income of £100,000 or more
- Looking at both income from rent and income from other sources, on average landlords received nearly half (50%) of their total income from rental property

¹ [English Private Landlord Survey 2024: main report - GOV.UK](#)

The licensing scheme, if agreed and introduced, would place the same obligations on all landlords and agents who let and manage HMO properties in Brent.

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.

The Public Sector Equality Duty (PSED), section 149 of the Equality Act 2010 requires the Council to have "due regard" to its equality aims when exercising its public functions. Brent believes that an Equality Analysis (EA) is the best method to demonstrate compliance with the PSED.

Brent is one of the most diverse boroughs in the UK and to work effectively in such a diverse setting, we need to have a good understanding of all our communities and to apply an evidence-based approach to our decision-making processes.

As part of the decision making process to introduce a new additional HMO licensing scheme, the Council undertook a public consultation which ran for 13 weeks from 10 March 2025 until 10 June 2025 and utilised a variety of methods to reach and seek opinions from all those likely to be affected by the council's proposals, both within and outside of the borough.

This EA has taken account of the consultation process, the information gathered through that process and assessed the impact that the recommendations could have on different protected groups and, where possible, identified methods for mitigating or avoiding any adverse impact on those groups.

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.

This EA is informed by the responses from the consultation process, Brent Equalities profile 2020-21, the 2021 Census and other data sources about the demographic, diversity and socio-economic characteristics of the local population across the borough, including: age, sex, disability and long-term health conditions, ethnicity, religion or belief, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy and maternity and income status.

The latest census data and reports, is available **on the [Census page on open data](#)**. We have benchmarked census data for Brent against England and Wales, London, Inner London and Outer London and data from other sources against London and Great Britain.

More information about our equalities objectives and about how we implement these is found in Brent Council Equity, Diversity, and Inclusion Strategy 2024 – 2028. [Equality and diversity | Brent Council](#). We have gathered enviro-crime, antisocial behaviour, and property data from our council’s recording and external databases, data from the latest English Housing Condition Survey reports and data from a Brent commissioned Housing Stock Survey report 2024.

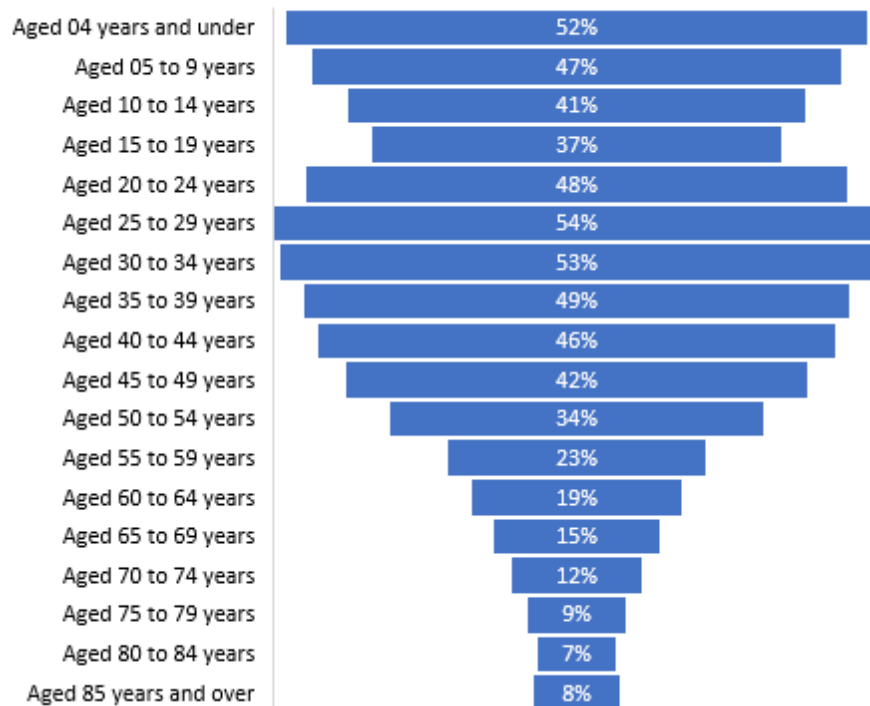
2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

Details of impacts identified

Census 2021 data shows that the highest proportions of Brent residents who inhabit the PRS are those between the ages of 25 and 34, followed by residents aged 14 or younger.

- Children aged 14 and under account for more than 20% of the total number of Brent residents living in the PRS.
- Nearly 52% of children who are aged 4 and under in Brent inhabit the PRS.
- Another large proportion of Brent residents who privately rent (nearly 43%) are aged between 25 and 44 years old (the parents of those young children presumably being partially among that demographic).
- Over 50% of Brent residents who are aged between 25 and 44 live in the PRS.
- Owner-occupation gradually rises as residents surpass the age of 29, with those residents aged 75 and over being least likely to inhabit Brent's PRS (with only 8% of that demographic privately renting).

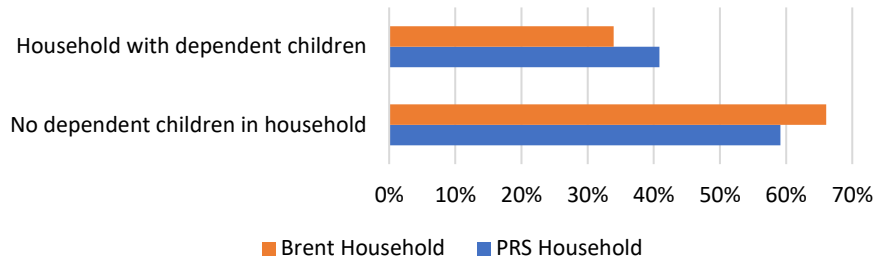
% of each age group living in the PRS in Brent



The Council also considered it relevant (within the equality analysis for 'age') to compare living arrangements and prevalence of dependent children in Brent's PRS with the borough as a whole:

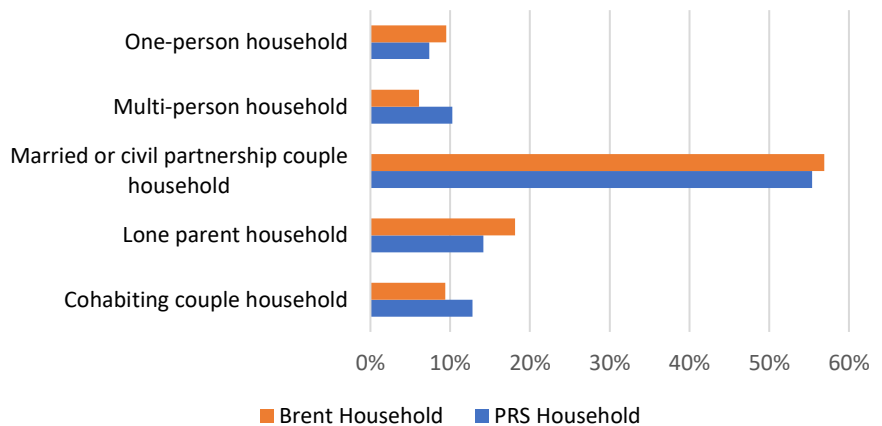
- Households with dependent children are underrepresented in Brent's PRS at 59% (compared with 66% of all households in the borough)

% Brent PRS households relative to % all Brent households



- PRS households in Brent broadly reflect the wider population of the borough in terms of living arrangements, though multi-person households and cohabitating couple households are slightly overrepresented in Brent's PRS, while one-person households, married or civil partnership couple households and lone-parent households are slightly underrepresented.

% Brent PRS households relative to % all Brent households



This indicates that younger people and multi-person households might be affected to a greater extent by the introduction of the proposed additional licensing scheme, which is intended to improve conditions in the private rented sector. Despite this prevalence, we are finding the numbers of older people and families renting from a private landlord are growing as a result of the growing unaffordability of owner-occupation and inaccessibility of social housing.

As the cost-of-living crisis continues, it is likely that many households with children will be unable to afford to put the heating on, making homes more susceptible to damp, mould and cold. Children aged 14 years or under are at the greatest risk of ill health caused by damp and mould in their homes.

Child poverty AHC was 39.5% in Brent for 2020-21, the seventh highest level across London (*End Child Poverty*). The average for London in the equivalent period was 35.2%. In the seven years since 2014/15 that these figures have been published there has been very little change in Brent's performance over time, with figures between a high of 40.9% for 2018-19 and a low of 39.5% in 2021-22².

Increasingly, families with young children are living in HMOs, with whole families sometimes renting a single room in an unlicensed property in substandard conditions. Students and young professionals, who can be exploited in the current rental market, also tend to live the private rented sector and in HMOs in particular.

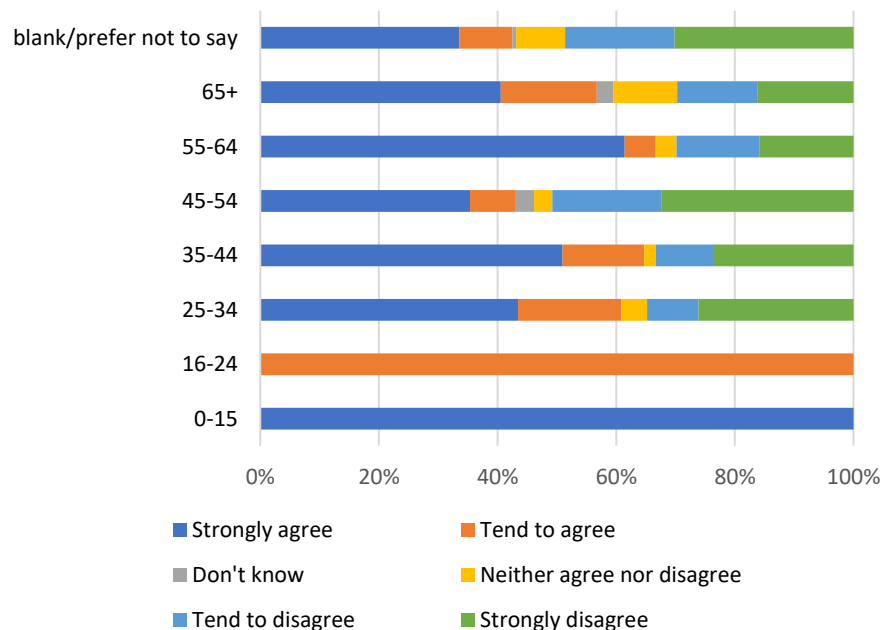
Effective regulation of HMOs, leading to an improvement in housing standards has the potential to benefit all HMO tenants as well as the wider community. We know that some health hazards are considered to be particularly serious for young people so this group would particularly benefit from the better regulation of the sector.

Respondents to the questionnaire

Compared to the Census data 2021 for adult population of the borough, younger residents (up to the age of 34) were underrepresented, whereas those over the age of 35 were more accurately represented in the consultation data.

Respondents across most age groups were largely in favour of the proposals, though there was more disagreement among some older age groups (who are less likely to be privately renting than younger residents).

Do you agree with the proposals? by age group

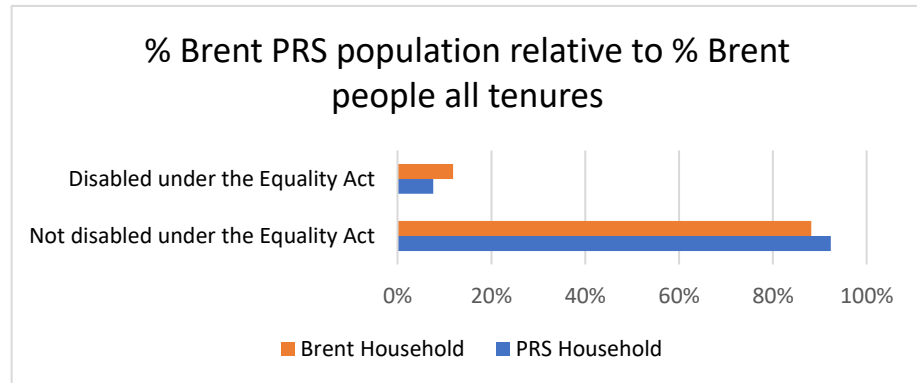


² Borough Plan 2023-27 Evidence Pack

DISABILITY

Details of impacts identified

According to Census 2021 data, residents who are disabled under the Equality Act are slightly underrepresented in Brent's PRS (8% compared to 12% of the borough's population).



People with disabilities may find themselves in the position of renting within an HMO. Unsuitable housing has a severe impact on people with disabilities, leading to anxiety, isolation, and which can hinder independent living. The Equalities and Human Rights Commission's 2018 report identified that disabled individuals face disadvantages in the private rented sector due to landlords' reluctance to adapt properties, hesitance to rent to them, and short-term tenancies discouraging adaptations. Hazards in unsafe properties can exacerbate existing conditions. Renewing the additional HMO licensing scheme will help improve conditions and safety for disabled tenants as the scheme will generate increased inspections. This will ensure people are referred to the appropriate internal departments or external agencies to have their living accommodation suitably assessed and adapted for their needs. Unsuitable or un-adapted housing can have a negative impact on disabled people, leading to mobility problems inside and outside the home, poorer mental health and a lack of employment opportunities. An ageing population will see the numbers of disabled people continuing to increase and it is important that the Council continues to use measures such as property licensing to ensure its residents with disabilities are living in safe, well-adapted homes.

If properties are assessed for the health and safety of their inhabitants, it is probable that people with mobility and visual/hearing difficulties, for example, may disproportionately benefit from licensing through professionals' suggestions of supportive modifications to the properties. This would serve to reduce the inequality gap between those with and without serious long term health conditions.

The renewal of the borough-wide additional HMO licensing schemes is considered to have an overall positive impact on this group. Proportionally the scheme is more likely to impact on people without long-term disabilities or illnesses as these people are less likely to be

in rented accommodation in the borough. However, for persons with disabilities/long-term illnesses who are in private rented accommodation, the schemes will also benefit them.

Respondents to the consultation

8% of the respondents to the questionnaire said they have a long-term physical or mental health condition or illness, which is less than the Census 2021 figure of 12% for the borough.

Of this 8% who said they have a long-term physical or mental health condition, the majority were in favour of the proposals.

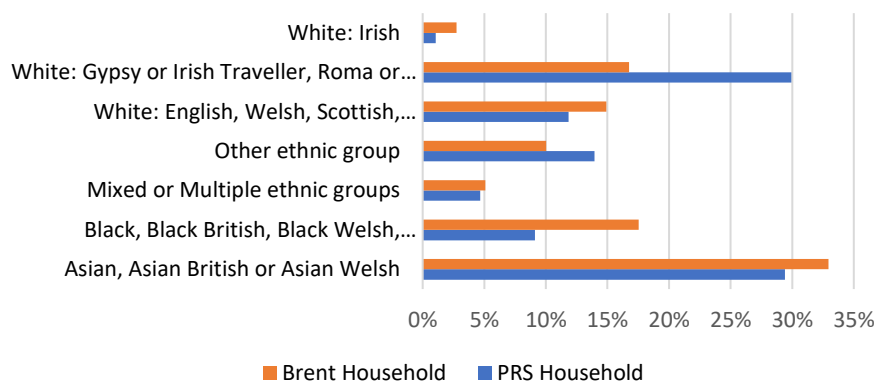
RACE

Details of impacts identified

Data from the 2021 census indicates that people who rent from a private landlord are broadly representative of the ethnicities within Brent's wider population, although some groups are over or underrepresented:

- The largest ethnic group in Brent, 'Asian, Asian British or Asian Welsh' (33% of Brent residents) is slightly underrepresented in the PRS, making up 29%.
- 'White: Gypsy or Irish Traveller, Roma or Other White' are overrepresented in the PRS at 30% of residents in that tenure (though only making up 17% of Brent's population).
- 'Black, Black British, Black Welsh, Caribbean or African' are underrepresented in the PRS at 9% of residents in that tenure while making up 18% of Brent's population.
- Other ethnicities are broadly representative of the resident population as a whole, with 'White: English, Welsh, Scottish, Northern Irish or British' slightly underrepresented and those who identified as 'Other ethnic group' slightly overrepresented.

% Brent PRS population relative to % Brent population all tenures

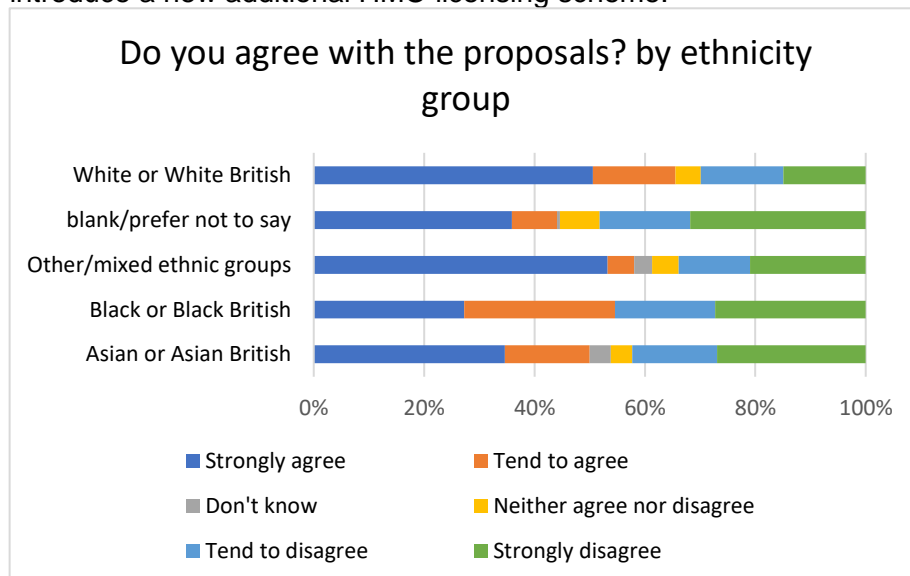


Respondents to the consultation

Of the respondents who chose to answer this question, the largest ethnic group was White or White British, who made up 47% of respondents. This is higher than the borough's Census figure of 34.6%. This was followed by Other/mixed ethnic groups, making up 33% of respondents which is above the Census figure of 15%. Asian or Asian British respondents made up 14%, compared to the Census figure of 32.8% and Black or Black British respondents were 6%, compared to the Census figure of 17.5%, therefore both Asian or Asian British and Black or Black British respondents were underrepresented.

It should however be noted that, along with many of the other equalities questions, a majority of respondents (51%) chose not to share their ethnicity, so definitive conclusions about representation cannot be made.

Most ethnic groups were broadly in favour of the proposals to introduce a new additional HMO licensing scheme.



The renewal of the additional HMO licensing scheme aims to safeguard vulnerable households from unscrupulous landlords. It aims to ensure tenants receive legal protections while taking robust enforcement actions against landlords who exploit their tenants and do not comply with their legal responsibilities.

The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number of landlords in the borough who might discriminate against people on the grounds of their race.

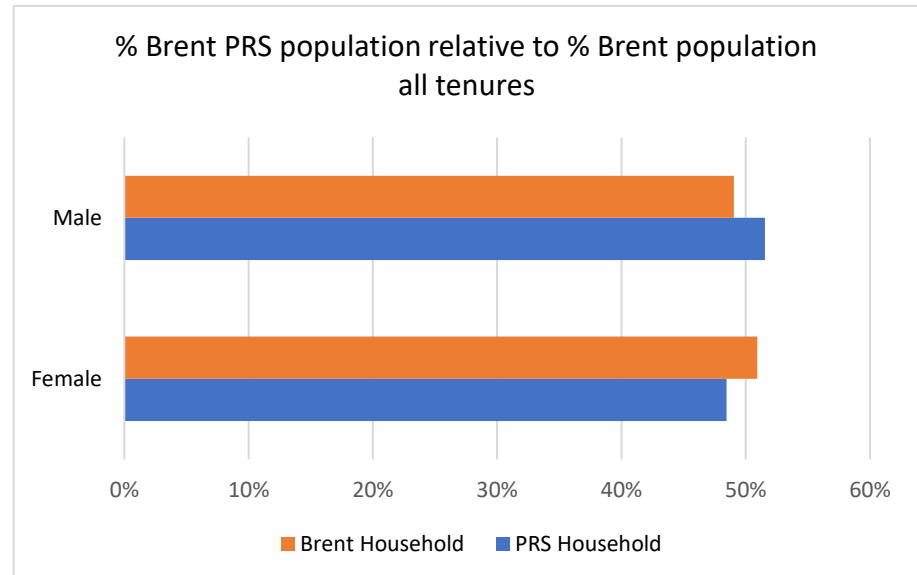
The proposal is to renew the additional HMO licensing scheme which, if agreed and implemented, would serve to improve the

standard of HMOs and the PRS. It is considered that this would have an overall positive impact across all ethnic groups.

SEX

Details of impacts identified

Census 2021 data shows that the numbers of males and females inhabiting the PRS in Brent corresponds with the total Brent population.



The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number of landlords in the borough who might discriminate against people on the grounds of their sex.

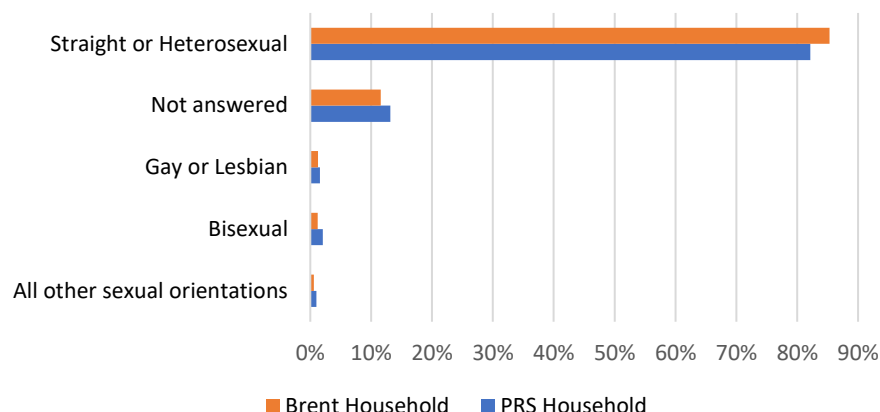
The proposal is to renew the additional HMO licensing scheme which, if agreed and implemented, would serve to improve the standard of HMOs and the PRS. It is considered that this would have an overall positive impact on both female and male PRS tenants.

SEXUAL ORIENTATION

Details of impacts identified

According to Census 2021 data (*residents aged 16 and over*), the sexual orientation of residents within the PRS in Brent is broadly similar to that of the wider Brent population.

% Brent PRS population relative to % Brent population all tenures



Additional HMO licensing aims to reduce antisocial behaviour which is likely to benefit people who suffer homophobic crime and incidents. The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number of landlords in the borough who might discriminate against people on the grounds of their sexual orientation.

The proposal is to renew the additional HMO licensing scheme which, if agreed and implemented, would serve to improve the standard of the HMOs and the PRS. It is considered that this would have an overall positive impact on tenants irrespective of sexual orientation.

PREGNANCY AND MATERNITY

Details of impacts identified

The Council does not hold specific data regarding pregnancy and maternity within the PRS. However, the ONS linked births dataset shows that in 2024 there were a total of 4,443 live births in Brent³. In 2022, the live birth rate was 13 per 1,000 population in the borough which is predicted to remain stable over the next ten years⁴. We already know that nearly 52% of children who are aged 4 and under, and over 47% of children between the ages of 5 and 9 in Brent live in the PRS. This suggests that a significant proportion of families with children reside in the private rented sector, and highlights that the licensing scheme's advantages would positively impact both parents and expectant parents.

The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or

³ [Births in England and Wales: linked births - Office for National Statistics](#)

⁴ [Birth characteristics - Office for National Statistics](#)

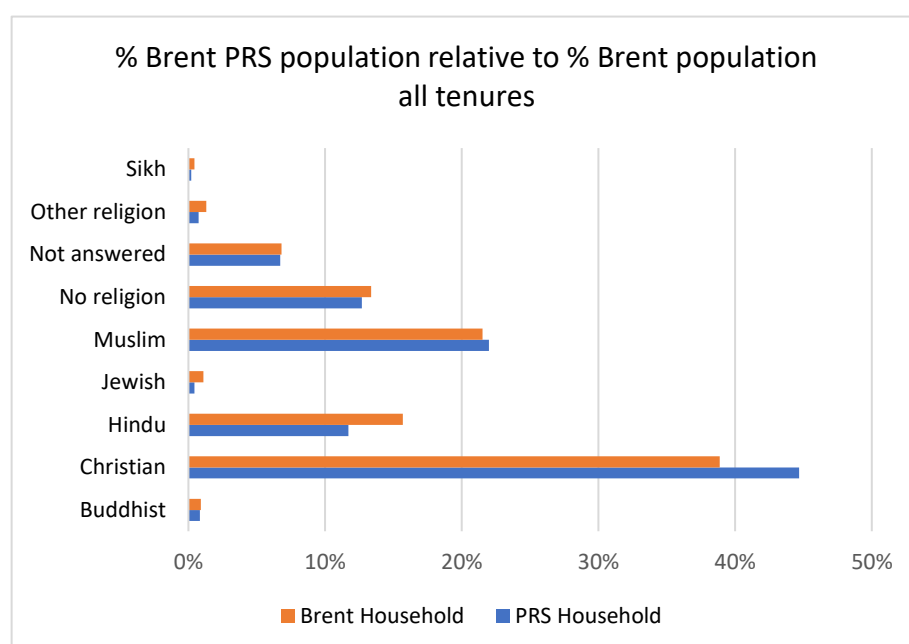
discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number of landlords in the borough who might discriminate against people on the grounds of pregnancy or maternity.

The proposal is to renew the additional HMO licensing scheme which, if agreed and implemented, would serve to improve the standard of HMOs and the PRS. It is considered that this would have an overall positive impact on pregnant women and women caring for babies and young children.

RELIGION OR BELIEF

Details of impacts identified

According to census 2021 data, the religious beliefs of persons occupying the PRS in Brent are broadly reflective of the wider population living in the borough. However, Christians are somewhat overrepresented in the PRS (45%) compared to the borough as a whole (39% of Brent's population) and Hindus are slightly underrepresented (12% of the PRS compared to 16% of Brent's population).



While there is limited evidence to suggest that renters might face poor conditions or exploitation in the private rented sector solely due to their religion, instances of direct or indirect religious discrimination cannot be entirely ruled out. It is more probable that when religion intersects with race and immigration status, renters may experience disadvantages or discrimination, potentially restricting them to the most insecure or substandard housing options.

The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number

of landlords in the borough who might discriminate against people on the grounds of their religion or beliefs.

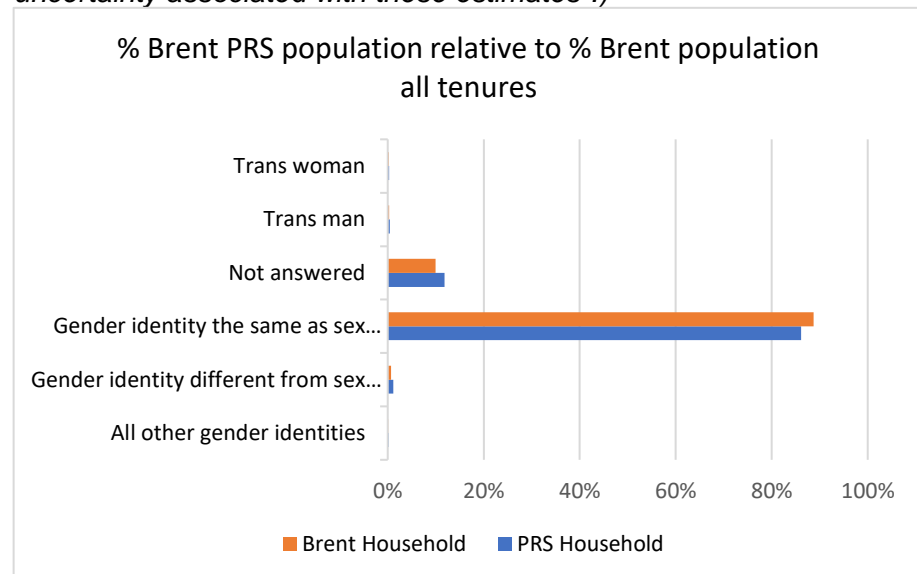
The proposal is to renew the additional HMO licensing scheme which, if agreed and implemented, would serve to improve the standard of HMOs and the PRS. It is considered that this would have an overall positive impact across all faith groups, and those of no faith at all.

GENDER REASSIGNMENT

Details of impacts identified

According to Census 2021 data (*residents aged 16 and over*), the gender identities reflected in the Brent residents who rent from a private landlord are broadly the same as in the wider Brent population.

(Gender Identity estimates from Census 2021 are official statistics in development. This reflects their innovative nature and the evolving understanding of measuring gender identity, along with the uncertainty associated with these estimates⁵.)



According to Stonewall's Trans Report (2018)⁶:

- One in four trans people (25%) were discriminated against when looking for a house or flat to rent or buy in the last year (up to 2018).
- One in five non-binary people (20%) have experienced discrimination while looking for a new home.
- Two in five trans people (41%) have experienced a hate crime or incident because of their gender identity in the last 12 months (most recent data from 2018).
- Three in ten non-binary people (31%) have experienced a hate crime or incident because of their gender identity.

⁵ Sexual orientation and gender identity quality information for Census 2021 - Office for National Statistics (ons.gov.uk)

⁶ LGBT in Britain - Trans Report (2018) | Stonewall

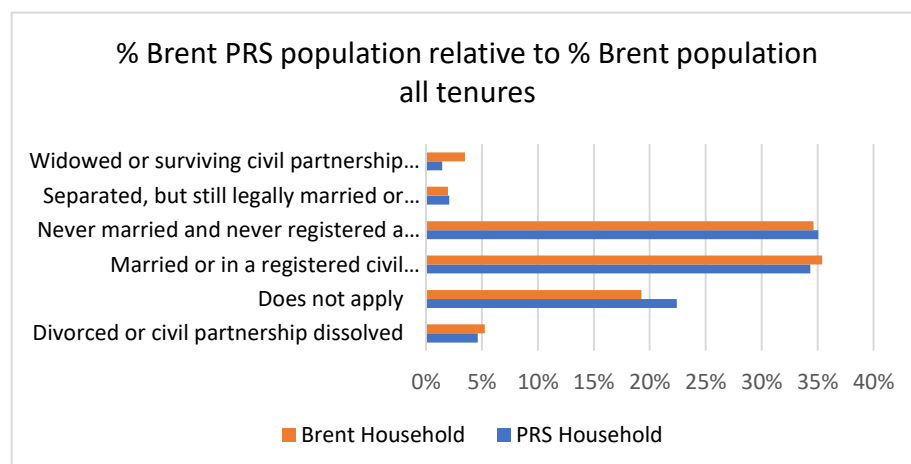
Additional HMO licensing aims to reduce antisocial behaviour within and associated to private rented homes, which is likely to benefit people who suffer transphobic crime and incidents. The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should therefore on balance reduce the number of landlords in the borough who might discriminate against people because of gender reassignment.

The proposal is to renew the additional HMO licensing scheme which, if agreed and implemented, would serve to improve the standard of the HMOs and the PRS. It is considered that this would have an overall positive impact on tenants irrespective of gender reassignment.

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified

Census data 2021 indicates that persons occupying the PRS in Brent broadly reflect the wider population of the borough in terms of their marital status, though those who are widowed or a surviving civil partner are somewhat underrepresented in the PRS (1% compared to 3% of Brent's overall population).



The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number of landlords in the borough who might discriminate against people on the grounds of whether they have entered into marriage or a civil partnership with someone of the same or a different sex.

The proposal is to renew the additional HMO licensing scheme which, if agreed and implemented, would serve to improve the standard of HMOs and the PRS. It is considered that this would have an overall positive impact on tenants irrespective of whether or not they are married or in a civil partnership.

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?

Mixed (representation of overall population explained above, broken down by demographic)

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?

We will monitor the impact on equalities during the implementation of the licensing scheme (if approved) and conduct a review 12 months after implementation.

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 anticipated that licensing is likely to bring about positive benefits to groups with protected characteristics, particularly those who are disadvantaged and who have little or no choice but having to rent in the private sector.

The key purpose of the scheme is to reduce antisocial behaviour, improve property conditions and management standards in HMOs. Addressing these criteria will have an

impact on reducing the level of deprivation, which will benefit residents across all protected characteristics and particularly more vulnerable groups.

In particular, BAME groups, families with young children, disabled residents and vulnerable adults will benefit from better enforcement of licence conditions and of the Housing Health and Safety Rating System standards. All groups will benefit from improvements in engagement, communication and signposting information between the council, landlords and tenants and other service providers. Information would relate to such matters as changes in the law affecting the PRS, energy efficiency measures and grants availability, information on local organisations and agencies which may be able to provide support.

There is an increased threat of homelessness for some residents should landlords decide to withdraw from the private renting sector altogether. To mitigate this, the proposal tries to minimise the cost of licences, including offering a discount for certain accredited landlords, in addition to training and education to help them to manage their properties.

A publicity campaign will be launched when licensing is introduced to make tenants and landlords aware of their rights and obligations and what tenants can do if they are threatened with eviction. Specific actions are set out in more detail in the action plan below.

If additional licensing is continued, it is intended to enforce the scheme robustly and to closely monitor the situation on an on-going basis and carry out periodic reviews.

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


Licensing will work with landlords and liaise with Temporary Accommodation teams.	Homeless prevented	Licensing Manager	April 2026
Assist tenants with legal advice and signpost them to relevant support services available to them.	Tenants' rights observed	Licensing Manager	April 2026
Provide communication with and support provided to tenants with Learning Disabilities, Mental Health needs.	Tenants' rights observed	Licensing Manager	April 2026
Licensing is likely to see an increase in enforcement action against BAME landlords who may be overrepresented in Brent. Enforcement will be in line with our private housing enforcement policy, where possible using civil penalties as an alternative prosecution.	Early compliance and applying formal enforcement only where required. Civil penalties used as opposed to prosecutions.	Licensing Manager	April 2026
Equalities impact to be part of the licensing review	Ensure positive outcome or justify any unavoidable negative outcome	Licensing Manager	April 2026

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	James Philip 
REVIEWING OFFICER: Head of Service	Triza Handa 
Operational Director:	Spencer Randolph

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 Brent	Cabinet 13 October 2025
	Report from the Corporate Director, Residents and Housing Services
	Lead Member – Cabinet Member for Housing (Councillor Fleur Donnelly- Jackson)
Authority to Proceed with New Energy Efficient Heating for The Oaks and Pharamond	
Wards Affected:	Roundwood & Brondesbury Park
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:	None
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	<p>Spencer Randolph, Director Housing Services 020 8937 2546 Spencer.Randolph@brent.gov.uk;</p> <p>Gary Mitchell, Head of Housing Management Property Services Gary.Mitchell@brent.gov.uk;</p> <p>Giuseppe Coia, Major Works and Refurbishments Manager 020 8937 2652 Giuseppe.Coia@brent.gov.uk;</p>

1.0 Executive Summary

- 1.1 This paper concerns a project to install energy efficient heating to replace the existing outdated and inefficient oil, gas and electric heating in the Council owned blocks of flats known as The Oaks and Pharamond. The preferred heat source is via ground source heat pumps, which will be complemented by cavity wall insulation to reduce the heat demand.

- 1.2 The project will be funded utilising a combination of The Warm Homes Social Housing Fund (WHSHF), previously known as the Social Housing Decarbonisation Fund, and a co-funding allocation from the council's Carbon Offset Fund.
- 1.3 The funding proposal has already been approved by the Capital Programme Board.

2.0 Recommendations

That Cabinet:

- 2.1 Approves adding the New Low Carbon, Energy Efficient Heating for Oaks and Pharamond housing to the capital programme.
- 2.2 Notes that the budget of £3,150,911 will be funded by £1,082,353 Warm Homes Social Housing Fund grant and £2,068,558 Carbon Offset Fund.
- 2.3 Authorises the Director of Housing Services to enter the necessary procurements to deliver the scheme including a works contractor and a technical consultant.

3.0 Detail

Cabinet Member Foreword

- 3.1 This report outlines the proposals to proceed with new energy efficient heating for the Oaks and Pharamond.
- 3.2 The current heating at the 2 blocks is inefficient and requires replacing. Pharamond has a communal oil fuelled system which is beyond its serviceable life. The works will also include installation of cavity wall insulation as required. Ground source heat pumps provide less expensive heating and hot water than traditional fossil fuels and the installations require less maintenance over their lifetime. Residents can expect to see a reduction in their heating charges.
- 3.3 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
- 3.4 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.

3.5 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

4.0 Background

4.1 The key WHSHF aims and objectives of the scheme are:

- **Tackling Fuel Poverty:** The primary objective is to reduce the number of households in fuel poverty by improving the energy efficiency ratings of social homes currently below EPC Band C and lowering energy bills for tenants through reducing the demand for heating.
- **Carbon Reduction:** The initiative aims to deliver cost-effective carbon savings that contribute to the achievement of national carbon budgets and progress towards the UK's target of Net Zero by 2050. This will be achieved by reducing CO₂ emissions from social housing.
- **Tenants:** The programme seeks to enhance the comfort, health, and well-being of social housing tenants by delivering warmer, more energy-efficient homes that improve living conditions and reduce energy consumption and costs.
- **Green Economy:** A key goal is to support economic resilience and aid in the growth of the green economy in the UK helping to safeguard and potentially create thousands of jobs and apprenticeships in the fastest growing sector of the UK economy.
- **Develop the Retrofit Sector:** The initiative will help foster growth in the retrofit supply chain, increasing capacity and capability, driving productivity, and encouraging innovation within the construction sector. Additionally, it aims to upskill social landlords in retrofit techniques to support ongoing improvements in energy efficiency across the social housing sector.

4.2 The 80 properties included in Brent's bid are located across two blocks: Pharamond and The Oaks. These blocks are a mixture of social housing currently administered by Brent and held within the Housing Revenue Account and private leaseholders.

4.3 Table 1 gives an overview of the property locations by postcode, Table 2 the starting EPC band of selected properties and Table 3 further detail on estimated costs and carbon savings.

Table 1. Breakdown of properties by postcode

Block name	Postcode	Number of properties
The Oaks	NW10 3SA	44
Pharamond	NW2 5RD	36

Table 2. Breakdown of properties by starting EPC Band

Starting EPC Band	G	F	E	D	C
Number of properties	1	1	5	10	18

Note: Only 35 out of 80 properties have current EPC ratings, and the table reflects this limitation. Further survey work/investigation is required prior to the works being undertaken and this has been factored into the proposed first year of the programme

Table 3. Further detail on estimated costs / carbon savings

Number of properties	Estimated cost of energy works £'000s	Estimated Lifecycle	Tonnes CO2e saved (lifetime)	Cost / tonne lifetime Carbon Saving £
80	3,151	30 years	6,000	615

- 4.4 The energy efficiency improvements for both blocks would involve installing a new heating system, by using ground source heat pumps, and replacing cavity wall insulation. The Pharamond block is of particular importance from an environmental sustainability perspective due to its reliance on an oil-fuelled heating system, which is scheduled for replacement to meet sustainability and efficiency targets.

5.0 Pre-tender Considerations

- 5.1 The new heating will provide benefits as follows:

- They are currently among the worst-performing properties in terms of their EPC ratings. Properties are expected to improve to a SAP C rating.
- Retrofitting properties within concentrated blocks is more efficient than addressing scattered street properties.
- Pharamond has an outdated, inefficient heating system which requires replacement. The proposal includes installing a more cost-effective, efficient, sustainable heating system through ground-source heat pumps.
- We are seeking to de-gas The Oaks and remove the oil fuel source from Pharamond so that both blocks are in line with our current approach to high rise council properties.

- The resident demographic at the properties is expected to benefit from warmer homes through the installation of cavity wall insulation as part of the works
- It is anticipated that the works will ultimately result in cost-savings to residents through a reduction in their energy bills, achieved through warmer, more efficient and sustainable properties. This will be modelled as part of detailed feasibility. Brent will in effect become the heat supplier to the 2 blocks and will need to comply with Heat Network Metering & Billing Regulations and decide how much of resident's heat usage it will recharge. VAT will be recharged at 5%. This will be considered in a future report once more detail is available.
- The Council will make savings on revenue maintenance costs and capital renewal costs over the elemental lifecycle. The new plant is very low maintenance once installed and has minimal running costs when compared to other sources of energy. The actual values will be calculated once more detail is available.

5.2 The project timetable is as follows and is in accordance with the terms of the grant funding:

Financial Year	FY 2025/2026	FY 2026/2027	FY 2027/2028	FY 2028/2029
Outline Design and Specification	Oct			
Procure Consultants	Nov			
Full Design and Specification Plus Planning	Dec - Mar	Apr - May		
Procurement of Works Contractor		June - Aug		
Contract Award and Works Commencement		Sep -	Ongoing	- Aug
Works Completed and Commissioned				Sep - Oct

Options Appraisal

5.3 Following Cabinet's decision in October 2024 to amend the governance of the Carbon Offset Fund, officers have recently evaluated alternative options for its use. This process included identifying other street properties within the council's housing stock that have poor energy efficiency ratings, as alternatives to Pharamond and The Oaks. Two scenarios were considered, which identified 82 properties suitable for either "light" or "deep" retrofit work. The financial implications of these scenarios ranged from £600k to £4m, with further feasibility work needed to determine whether these alternatives would result in greater carbon savings compared to retrofitting Pharamond and The Oaks. Additionally, it was noted that retrofitting separate street properties would pose greater delivery risks due to the complexities involved, compared to working on two communal blocks.

- 5.4 This project would not have been viable without funding from the WSHF, and the council's Carbon Offset Fund.

Benefits to Council

- 5.5 The project provides the following benefits to the Council.

Description of Benefit	Financial/ non-financial benefit?	Estimated benefit amount?	When will the benefit be realised?	One-off or recurring?
New heating and hot water system for the Oaks.	Financial	£1,100,000	2026 /27	One-off
New heating and hot water system for Pharamond.	Financial	£900,000	2026 / 27	One-off
Reduction in ongoing maintenance costs.	Financial	£20,000 per annum	2027 /2028	Recurring
Carbon Savings	Non-financial	6,000 Tonnes	2027 / 2028	One-off

Alignment with Strategic Objectives

- 5.6 The programme will improve energy efficiency and reduce carbon emissions in 80 poorly performing properties in the council housing stock from an energy efficiency perspective. This work aligns with Brent's Climate & Ecological Emergency Strategy (2021-2030) and is a specific key deliverable within the current Climate Programme 2024-2026, approved by Cabinet in October 2024. It also aligns with several existing Borough Plan priorities, specifically under Strategic Priority 2: *A Cleaner, Greener Future* and Strategic Priority 5: *A Healthier Brent*. The programme directly supports these priorities by enhancing environmental sustainability and the co-benefit of seeking to improve the health and well-being of Brent's residents living in the properties identified for works, with warmer homes delivered through improved insulation measures.
- 5.7 This project is the second substantial retrofit programme undertaken by LB Brent, furthering the Council's commitment to decarbonisation. The first programme involved retrofitting 100 properties throughout the borough as part of the Social Housing Decarbonisation Fund 2 project. The project contributes to advancing the borough's climate action goals and reflects an increased ambition to improve energy efficiency across the council's housing stock.

Procurement

- 5.8 A consultant will be procured from a Framework.
- 5.9 The works contractor will be procured from a Framework.
- 6.0 Stakeholder and ward member consultation and engagement**
- 6.1 The Cabinet Member for Housing and ward councillors have been briefed and consulted on this proposal.

7.0 Financial Considerations

- 7.1 The proposed budget for the project is £3.15m funded by £1.08m Warm Homes Social Housing Fund grant and £2.07m Carbon Offset Fund. The Corporate Director for Housing and Resident Services approved entry into the Warm Homes Social Housing Fund grant in May 2025.

Warm Homes Social Housing Fund	£	1,082,353
Carbon Offset Fund	£	2,068,558
Total	£	3,150,911

- 7.2 The budget is made up as follows:

THE OAKS AND PHARAMOND				
Estimated cost of the heating works			£	2,400,000
Allowance to reinstate dwellings following removal of existing heating			£	120,000
Cavity wall insulation / wall ties allowance			£	320,000
Mast Climbers / asbseil allowance			£	100,000
Additional consultancy			£	100,000
Contingency			£	110,911
			£	3,150,911

- 7.3 There is remaining Carbon Offset Funding which could be used if further cost uplifts are unavoidable. Because of the current challenging financial position of the Housing Revenue Accounts, there is no additional funding available to cover overspends nor other works to improve the properties.
- 7.4 Section 5.5 outlines some estimated cost savings arising from the project. The Council will recharge residents for their energy usage from the new ground source heat pump installation. The financial savings are savings for the HRA.
- 7.5 VAT is charged at 5% on energy projects so this is a taxable supply and the VAT on the capital works is recoverable.
- 7.6 The selected heating specification will also legally be considered a betterment and mostly not fully rechargeable. Officers are considering at what cost/rate to charge the 23 leaseholders in the 2 blocks to recover non-betterment costs. This will potentially reduce the required funding from the Carbon offset Fund.

8.0 Legal Considerations

- 8.1 As noted in this report, funding from the Warm Homes Social Housing Fund grant is being proposed. Officers will confirm that applicable obligations, requirements and benchmarks are followed, and all conditions are met for the receipt of grant funds.
- 8.2 Further, procurement of those consultants stated above need to be in accordance with the Council's constitution, relevant standing orders, and the relevant procurement laws. Should these recommendations be agreed by

Cabinet, officers will consult with legal and procurement colleagues to progress such appointments.

9.0 Equity, Diversity & Inclusion (EDI) Considerations

9.1 As a public authority, the Council is subject to the Public Sector Equality Duty (PSED) under Section 149 of the Equality Act 2010 (EqA). This duty requires the Council to actively consider the need to eliminate discrimination, advance equality of opportunity, and promote good relations between people from different backgrounds. In line with this duty, a full Equality Impact Assessment (EIA) was carried out as part of the adoption of the Brent Climate and Ecological Strategy in 2021. This EIA is publicly available on the Council's website and outlines the anticipated impacts of climate and housing interventions on different groups, particularly those who may be disproportionately affected by poor housing conditions or fuel poverty.

9.2 Key EDI considerations in the context of the housing retrofitting and energy efficiency improvements include:

Prioritisation of At-Risk Groups: The retrofitting of housing and improvements to energy efficiency are designed to target those who are most at risk of fuel poverty, with a specific focus on households that include vulnerable groups such as elderly residents, those with disabilities, and families with young children. Ensuring that these households benefit from warmer, more energy-efficient homes help reduce health inequalities, particularly in relation to respiratory illnesses exacerbated by cold, damp living conditions.

Fuel Poverty: The strategy prioritises households in areas with high levels of fuel poverty, particularly those with residents who are from lower-income backgrounds, Black, Asian, and Minority Ethnic (BAME) communities, and other groups that may face greater barriers to accessing energy-efficient housing. These groups are often more vulnerable to the negative effects of poor housing conditions, including the physical and mental health impacts of living in energy-inefficient homes.

Health Impacts: There is a clear link between poor housing conditions and public health outcomes. Retrofitting homes to improve energy efficiency will not only reduce energy bills but will also mitigate risks associated with respiratory and cardiovascular diseases, which are more prevalent among vulnerable groups. Reducing these health risks aligns with the Council's commitment to improving public health outcomes and advancing equality of opportunity for all residents, particularly those most in need.

9.3 By ensuring that energy efficiency interventions are delivered in a way that is inclusive and equitable, the Council aims to make a significant contribution to reducing health disparities and promoting a more sustainable, healthy living environment for all residents.

9.4 Engagement with residents of the affected blocks will be coordinated in collaboration with the Council's delivery partner to ensure clear and timely

information about the upcoming energy efficiency improvements. This will include providing updates on the project timeline, potential disruptions, and the benefits of the work to residents.

10.0 Climate Change and Environmental Considerations

- 10.1 Implementing this project will enable Brent to make energy efficiency improvements to some of its worst performing housing stock, improving insulation and therefore reducing carbon emissions from domestic properties. The project is a key deliverable within the Council's current Climate Programme (2024-26) approved by Cabinet in October 2024.
- 10.2 This project will also seek to support the green economy in Brent, with opportunities to collaborate with local partners, such as Brent's own Green Skills Centre at the College of Northwest London, to build local capacity and skills.

11.0 Human Resources/Property Considerations (if appropriate)

- 11.1 None.

12.0 Communication Considerations


- 12.1 The project will require a comprehensive communication strategy. This will include an open day where the project team is invited to discuss the project logistics and impact on the residents.
- 12.2 A detailed communications plan will be developed to include tenants and leaseholders. This will include:
- An initial letter to all residents and ward councillors outlining the scope and objectives of the project. This will explain what disruption can be expected and that residents can remain in their homes during the works.
 - A meeting with residents once more detailed specifications are prepared. This is expected to be in December 2025. This will be followed up by minutes of the meeting and a copy of the specification.
 - Newsletters and / or meetings at each milestone stage.
 - Monthly newsletters during the course of the works.
 - A separate meeting for leaseholders when a decision is made around their recharges.
 - Section 20 consultation meetings.
 - Ad-hoc meetings as required.

Report sign off:

Thomas Cattermole

Corporate Director Residents and
Housing Services

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	Cabinet 13 October 2025
	Report from the Corporate Director of Service Reform and Strategy
	Lead Member – Cabinet member for Climate Action & Community Power (Councillor Jake Rubin)
Corporate Performance update and Q1 reporting	
Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
List of Appendices:	One Appendix A: Borough Plan Q1 Scorecard
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Jon Cartwright, Head of Change and Customer Insight 020 8937 1742 Jon.Cartwright@brent.gov.uk Tom Pickup, Policy and Performance Manager 020 8937 4116 Tom.Pickup@brent.gov.uk Anisha Fernandes Senior Performance Officer 020 8937 3927 Anisha.Fernandes@brent.gov.uk Daniel Henderson Senior Performance Officer 020 8937 2841 Daniel.Henderson@brent.gov.uk

1. Executive Summary

- 1.1. The paper also sets out the council's performance position for Q1 2025/26, using the Borough Plan performance scorecard and providing updates on key activities that support delivery of the Borough Plan priorities and outcomes.

2. Recommendation(s)

Cabinet is asked to:

- 2.1. Note the Borough Plan 2025/2026 performance reporting for Q1 set out from 3.2 and included in Appendix A, and:
 - 2.1.1. Consider the current and future strategic risks associated with the information provided and agree remedial actions on strategic risks as appropriate.
 - 2.1.2. Challenge progress with responsible officers as necessary.

3. Detail

3.1. Cabinet member Foreword

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

3.2. Borough Plan performance Q1

- 3.2.1. The Q1 performance scorecard includes a total of 60 key indicators from the Borough Plan. Of the 60 Borough Plan indicators reported this quarter, 48% were green, 25% red, and the remainder amber or contextual.
- 3.2.2. Each KPI is assigned a Red, Amber or Green rating based on its performance against the quarterly targets.
 - Green – KPI has met or exceeded its target.
 - Amber – KPI is slightly off target, falling between 0.01% and 5% outside the target.
 - Red – KPI is significantly off target, exceeding 5% variance from the target.
- 3.2.3. Performance breakdown for Q1 Borough Plan indicators:

Table 5

Priority	Red	Amber	Green	Contextual
Prosperity and Stability in Brent	7	1	9	4
Cleaner, Greener future	1	0	9	3
Thriving communities	1	0	2	5
The Best start in life	5	1	3	0
A Healthier Brent	1	0	6	2
Total	15	2	29	14

Prosperity and Stability in Brent

Red KPIs

- 3.2.4. At the end of Q1 2025/26, i4B purchased one property against the 2025/26 acquisition target of 15. An additional 10 properties are currently in conveyancing.
- 3.2.5. The number of households in temporary accommodation stood at 2,411, against a target of 2,100, resulting in this KPI being rated Red. High demand for homelessness services has persisted throughout the quarter, contributing to continued growth in temporary accommodation placements. However, there was a slight decrease in numbers in the last month of the quarter.
- 3.2.6. The number of Houses of Multiple Occupation (HMO) licensed within the borough stands at 4,798, below the target of 5,578, resulting in a red rating for this KPI. The Brent Additional Licensing Scheme ended on 31 January 2025, meaning that currently smaller HMOs are no longer licensable. This reduction directly reflects the impact of the loss of the scheme. A report will be going to Cabinet in October to redesignate a borough wide additional licensing scheme and the new designation should come into force February/March 2026.
- 3.2.7. The average days taken to process change events was 7.25, missing the target of 5 days and resulting in a red rating. In April, processing time increased to 7 days from 2 days in March. In May, this rose slightly to 8 days due to rent increase notifications from Social Landlords and delays in their responses, alongside delays in ATLAS file transfers. June saw a slight improvement as Social Landlords provided information more promptly and CIC assessments were completed more efficiently, reducing processing times.
- 3.2.8. The average number of days to process RSF applications was 25, against a target of 20 days, resulting in this KPI being rated red. However, there is clear improvement from 37 days in April and 30 days in May. The backlog clearance plan is proving effective, with the volume of outstanding applications steadily reducing, directly contributing to a decrease in overall processing times. This progress demonstrates enhanced efficiency in case management and is positively impacting service delivery and response time.

- 3.2.9. 27 job outcomes were achieved through Brent Works, below the target of 37 and resulting in a red rating.
- 3.2.10. Brent Start recorded an overall achievement rate of 86%, short of the 93% target and rated red. This reflects in-year academic results only; as further results are still to be claimed, performance is expected to align more closely with the 93% target.

Amber, Green and contextual KPIs

- 3.2.11. The average number of days taken to process new benefit claims currently stands at 23.72, marginally exceeding the target of 22 days rating this Amber. In April, processing times met the target, maintaining an average of 22 days at the start of the financial year. However, in May, processing experienced delays due to a combination of late information being received from the Housing department and increased diary commitments, which were impacted by limited resource availability to manage daily workloads.
- 3.2.12. A total of 4,564 residents accessed Community Hubs, exceeding the target of 3,500. This represents an overall increase compared to previous quarters, likely influenced by the Council Tax Support Scheme.
- 3.2.13. 82% of enquiries at the Community Hubs were resolved at the point of exceeding that target of 80%. Throughout the quarter, the Community Hubs experienced increased demand, largely driven by changes to the council tax support scheme. Despite this, the team improved their first point of contact resolution rate, demonstrating strong service efficiency. A temporary data recording issue in May affected reported figures but has since been resolved. June saw a continued rise in enquiries, particularly in areas such as Council Tax, Housing Benefit, and Homelessness, highlighting ongoing pressure on the service
- 3.2.14. The percentage of jobs secured paying the London Living Wage (LLW) was 83%, exceeding the target of 80% and achieving a green rating. This is a slight improvement on last year's 82%. Minor quarterly fluctuations are expected due to seasonal trends, such as summer and Christmas employment patterns.
- 3.2.15. 13 Apprenticeship outcomes were achieved through Brent Works, surpassing the target of 12. Performance followed a typical Q1 pattern, with 5 outcomes in April 3 in May, and 5 in June, consistent with trends observed in the same period last year.
- 3.2.16. A total of 44 local apprenticeships and work experience opportunities were delivered, exceeding the target of 20 and rated Green. This performance is higher than in Q1 last year. Through our social value commitments, we continue to create apprenticeships and work experience opportunities, with a particular focus on disadvantaged groups, for the Brent community
- 3.2.17. There were 11 job and apprenticeship opportunities created in growth industries across the borough, a similar level to Q1 last year. A significant

proportion of these apprenticeships are in construction, which remains a key growth sector

- 3.2.18. Percentage of Black, Asian and Minority Ethnic employees remained consistent at 71.7% in Q1 which is which is the highest across all London Borough's.
- 3.2.19. 15 properties were refurbished and brought back into use, exceeding the target of 12. Several grants are in the pipeline, with around 16 units progressing from enquiry to approval and further non-grant properties expected to be occupied this year. Empty Property Grants are landlord-led, with works financed upfront by landlords and grants only paid on completion. While some projects may be delayed or cancelled, as in previous years, most completions are expected in the final quarter of the financial year.
- 3.2.20. 33% of suppliers used were local, exceeding the target of 25%. Local suppliers are defined as those with a Brent postcode, which can include both locally based businesses and national organisations with a presence in the borough
- 3.2.21. 70 affordable homes were delivered by external providers (incl. S.106) This is a contextual measure, with delivery this quarter provided by Metropolitan.
- 3.2.22. While the council delivered 115 new homes at London Affordable Rent (LAR) in May 2025 at Grand Union Phase 2, Block F (Clearwater House, 14 Quay Walk, Wembley HA0). The development comprised 32 one-bed, 52 two-bed, and 31 three-bed homes.
- 3.2.23. 497 referrals to food banks were made through Brent Hubs, a decrease compared with previous quarters. The reduction is likely linked to phone handling issues, and new management procedures have been introduced to address this. The impact on referral numbers will be closely monitored.
- 3.2.24. 328 applications were submitted for the Digital Support Package, with 185 cases approved during the same period. Delivery is progressing at a steady pace, with the service moving toward achieving a targeted four-week lead time for assessing and providing all packages.

Cleaner, Greener Future

Red KPIs

- 3.2.25. No electric vehicle (EV) charge points were installed against a quarterly target of 15, resulting in the KPI being rated Red. Delivery will be progressed through the Local Electric Vehicle Infrastructure (LEVI) funded programme. The Council is currently awaiting the outcome of a joint borough funding application, which will determine the timeline for installation

Amber, Green and Contextual KPIs

- 3.2.26. In Q1, 98% of residential fly-tips were cleared up by the contractor within 48 hours, slightly below the 100% target, resulting in the KPI being rated Amber. The target was not met due to Persistent Organic Pollutants (POPs) being collected separately in line with new legislation. This is being closely monitored internally to ensure that POPs collection does not significantly impact overall performance.
- 3.2.27. 153 bike hangers have been installed, significantly exceeding the target of 41 and resulting in a green rating. Consultation is underway for a further 17 installations, supporting the Council's sustainable transport ambitions.
- 3.2.28. The proportion of borough schools with a School Street scheme reached 44%, above the 39% target. The Council is working with 79 schools in partnership with Transport for London, with two additional schools scheduled to implement schemes later in the year
- 3.2.29. 100% of reported and inspected Category 2 defects were repaired on time, exceeding the 98% target. All works were attended to within the 7-day and 28-day contractual timelines, reflecting strong service performance.
- 3.2.30. Annual percentage carbon emissions reduction from the Council's own estate and operations have reduced by 77.5% against the 2010–11 baseline, exceeding the 71.7% target. This demonstrates continued progress towards the Council's long-term carbon reduction goals. This covers corporate buildings, street lighting and the council fleet. Data collated annually in summer for previous fin. year. This data is for 2023/24. 2024/25 data will be available in Q2 2025/26.
- 3.2.31. Brent's recycling rate stood at 35%, above the 30% target and an improvement on both Q4 2024/25 and the overall 2024/25 performance. The rise is largely due to a reduction in gate rejects from the recycling processor. However, contamination levels within accepted loads remain a concern and are being addressed through the Council's contamination program and the ongoing 'Monsters' communications campaign.
- 3.2.32. The average kilograms of residual waste collected per household was 96.93 Kg of the target, below the threshold of 104.9 Kgs and lower than the previous quarter, resulting in a green rating. This positive outcome supports the Council's long-term aim to reduce residual waste and increase recycling rates.
- 3.2.33. A total of 4,374 fly-tipping incidents were investigated, exceeding the target of 3,000 and resulting in a green rating. The number of investigations is linked to the tasks assigned to patrol teams, with peaks in activity associated with Public Spaces Protection Order (PSPO) enforcement.
- 3.2.34. The proportion of sites failing street cleansing standards for litter was 2.9%, significantly better than the 9% threshold. Weekly inspections by Neighborhood Managers, undertaken in partnership with the contractor, confirm that street cleansing standards remain at an acceptable level.

- 3.2.35. A total of 904 formal enforcement actions for fly-tipping were undertaken. Enforcement activity remained steady and is consistent with seasonal averages.
- 3.2.36. 80 community projects were awarded Together Towards Zero funding. Cumulative performance since 2022/23. Round 4 of the Together Towards Zero small grants scheme opened in Spring 2025. The scheme remains popular with residents and allows community organisations and resident groups to apply for a grant of up to £5,000 to fund local environmental sustainability activities in the borough, thus empowering communities to support the council's climate action goals.
- 3.2.37. A total of 1,073 Council housing stock (domestic) units have been retrofitted with at least one energy efficiency measure since 2019. The most recent program, funded through the Social Housing Decarbonization Fund (Phase 2.1), delivered upgrades to 100 Brent homes, improving their energy efficiency.

Thriving Communities

Red KPIs

- 3.2.38. In Q1, 55 hours were contributed toward supporting events within the community, below the target of 65 and resulting in the KPI being rated Red. The Council continues to secure social value commitments through its procurement processes to support the delivery of better outcomes for the community, including training and events.

Green and Contextual KPIs

- 3.2.39. A total of 225,735 books were issued, including Home Library/Outreach Service and e-downloads, exceeding the target of 170,391 and resulting in the KPI being rated Green. Strong performance was seen in Kingsbury, Harlesden, Wembley, Ealing Road, and Outreach services, alongside a 5.7% increase in e-borrowing. Some libraries fell slightly below their individual targets due to closures, seasonal factors, and varying local demand; however, overall performance remained well above target for the quarter.
- 3.2.40. Library visits reached 316,785, meeting the target and resulting in the KPI being rated Green. While April and May saw slight decreases in visits (4.3% and 4.8% respectively) due to public holiday closures and favourable weather encouraging outdoor activities, June recorded strong performance, with Kingsbury, Wembley, and Willesden Green meeting their targets and other branches showing month-on-month improvements. The soft closure of the Civic Centre at weekends on event days has had some impact on footfall figures.
- 3.2.41. The Community Engagement and Social Infrastructure (CESI) team attended 74 community engagement events across the borough. Highlights included the Philippine Independence Day celebration, a Community Safety Meeting

on drug and knife-related issues, the South Kilburn Community Working Party with South Kilburn Regeneration representatives, the Repair Café, the London Funders Arts, Heritage & Culture Network Meeting, and other local events.

- 3.2.42. Alongside this engagement activity, work focused on developing a new grant partnership with the Wembley Stadium Foundation. This collaboration increased the Love Where You Live grant fund (LWYL) from £60,000 per year to £200,000 per year, with the maximum award rising from £500 to up to £15,000. To manage the increased funding pot and anticipated demand within existing team capacity, the grant round will now run twice a year instead of monthly. The first round under the new partnership, held from 30 May to 29 June attracted 143 applications, the highest in recent years with 10% from grassroots organisations and 53% from applicants who had either never received funding from Brent Council or had not been funded in the past three years.
- 3.2.43. The resident support fund approved 1,465 applications, providing vital financial assistance to residents in need. Grant support continues to be processed as quickly as possible, with applications submitted on 21 July 2025 currently being actioned as at end of July 2025. The service remains focused on reducing turnaround times while maintaining a fair and consistent approach.
- 3.2.44. No Brent Connects meetings were held, as the programme is seasonal and typically runs from October to March/April. The last meeting took place at the end of March, and reporting will resume in the next cycle.

The Best Start in Life

Red KPIs

- 3.2.45. In Q1, Number of youth participation in Care Leavers Hub activities was 20, below the target of 35 rating this KPI red. Attendance comprised 7 young people in May and 13 in June 2025. No event was held in April, as funding was intentionally reserved for higher-profile and higher-cost activities later in the year, such as a planned event at the O2. Participation is expected to increase in subsequent quarters as these larger events take place.
- 3.2.46. Participation in Brent Youth Parliament (BYP) activities was 24, below the target of 30, resulting in a red rating. Attendance included 13 young people at the April BYP meeting, with no meeting in May due to members' exams, and 11 attending the June meeting despite ongoing exams. Additional engagement during the quarter included: 7 BYP members attending the Brent Youth Strategy launch and 9 taking part in BYP Executive training (April); 6 attending the London Youth Achievement Awards and 1 representing BYP at the London Youth Assembly (May); and 3 volunteering at SEND celebration events (June).

- 3.2.47. The proportion of Looked After Children (LAC) in Year 12 and 13 who were in education, employment, or training (EET) stood at 69%, down 1% from Q4 and below the 80% target, resulting in a red rating.
- 3.2.48. The percentage of care leavers aged 19-21 who are engaged in education, employment, or training (EET) is 54% for those with birthdays in Q1, which is 1% less than Q4 and 3% below the target of 57%, which rates it red. This KPI can vary from quarter to quarter due to the different young people who make up each cohort.
- 3.2.49. The overall percentage of children on a second/subsequent CP Plan was 12.8% in Q1, just below the 13% target. Within this, 36.36% had gangs, missing, CSE, or criminal exploitation as the main factor, up from 13.4% in Q4. The sharp increase is due to a smaller total number of CP Plans and a very small subset in this category, making the KPI volatile. Although numbers are low, the high proportion in exploitation-related cases signals significant safeguarding concerns.

Amber, Green and Contextual KPIs

- 3.2.50. In Q1, Brent Care Journeys 2.0 engaged 25 care leavers (aged 18–25) and 9 looked after children (aged 11–17), totalling 34 attendees. This is just one participant below the target of 35, resulting in an amber rating, and represents the highest attendance recorded to date.
- 3.2.51. The number of young people from Black African, Caribbean, and Somali communities who were permanently excluded from Brent schools (all pupils) is rated Green. 50% (2 of 4) permanent exclusions of male pupils in Q4 from Brent Schools were of young male pupils from Black African, Caribbean or Somali communities. The overall number and cohort is a smaller when compared to Q4 (4 out of 9) which results in a higher percentage. This KPI will vary from quarter to quarter due to the low number of pupils who make up each cohort.
- 3.2.52. Care Quality Ambassadors and Care Leavers participated in 9 inspections of residential homes, exceeding the quarterly target of 6, resulting in a green rating.
- 3.2.53. A total of 7,465 registered service users had contact with a Family Wellbeing Centre, significantly exceeding the quarterly target of 2,691 and resulting in a green rating. This represents 41% of the 2024/25 annual total of 18,079, demonstrating the Centres' continued strong reach.

A Healthier Brent

Red KPIs

- 3.2.54. In Q1, 39% of care act assessments were completed within 28 calendar days, missing the target of 80% and resulting in a red rating. While performance remains below target, this represents a 10% improvement on the Q4

2024/2025 outturn of 29%, indicating that progress made in Q4 24/25 has been maintained in Q1 25/26. Further targeted action within the service has included a reset week, focused on the completion of outstanding workflows. To support this, ASC Performance have developed a dashboard to give Managers and Social Workers full access to outstanding work. Managers will follow up in Supervision with social workers to agree priorities and actions. Timely completion of workflow and the outcomes of the reset week will be a key topic at the next ASC Staff Quarterly in September, reiterating the importance of completing assessments within 28 days. In addition, the Mosaic End to End review is due to complete in October/November when the new workflow will go live, simplifying the process and supporting social workers to work more efficiently. It is anticipated that further improvement will be made in the latter half of the year as the new workflow goes live.

Green and Contextual KPIs

- 3.2.55. In Q1, 95.5% of new birth visits were completed within 14 days, meeting the target of 95% and resulting in a green rating. Visits within 30 days were also above target, at 98.7% against a target of 98%.
- 3.2.56. The total number of adults in structured treatment was 1,429 (rolling 12-month figure to the end of April 2025), slightly exceeding the target of 1,425 and resulting in a green rating. The multi-agency Brent Drug and Alcohol Partnership continues to develop, with regular management contact between Brent and Via (the service provider) to ensure service provision. Service user-led engagement and delivery of services through B3 also continues.
- 3.2.57. In Q1, the Brent Health Matters (BHM) programme held 242 community events, exceeding the target of 175 and resulting in a green rating. These events include all Public Health team health promotion activities, BHM health promotion events, and BHM health and wellbeing events. The Q1 2025/26 figure is higher than both Q1 last year (208) and the 2024/25 average number of events per quarter (217).
- 3.2.58. Through those events, the programme reached and engaged with 513 organisations, meeting the target of 500 and resulting in a green rating. These figures relate to organisations engaged with the BHM programme, and the same organisation may be engaged on multiple occasions in the period. We have seen community organisations generally move from the informing stage to the co-creating and empowering stages which meets our aim.
- 3.2.59. BHM colleagues also completed 1,142 health checks at events this quarter, exceeding the target of 1,000 and resulting in a green rating. These checks typically include BMI, blood pressure, heart rate, and diabetes risk assessments. The programme continues to engage communities that do not normally access health and care services, as well as emerging communities, through targeted health and wellbeing events. The number of health checks completed this quarter was significantly higher than in Q1 last year (899).

3.2.60. In Q1, the reablement service achieved performance of 82%, exceeding the target of 75% and resulting in a green rating.

3.2.61. Adult Social Care's focus on supporting people to live as independently as possible is having a positive impact, with the rate of older adults whose long-term support needs were met by admission to residential and nursing care homes was 43.2 per 100,000 population, below target.

3.2.62. Rate of younger adults whose long-term support needs were met by admission to residential and nursing care homes was 3.5 per 100,000 population, remaining close to target. Actions through the Quality Management Meeting (QAM) to review recommended care packages has supported the reduction in admissions for both older and younger adults.

4. Stakeholder and ward member consultation and engagement

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

4.2 Balanced scorecard measures have been developed in consultation with Lead Members, CMT and nominated service leads.

5.0 Financial Considerations

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

6.0 Legal Considerations

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

7.0 Equity, Diversity & Inclusion (EDI) Considerations

7.1 There are no direct diversity implications. The Learning, growth and culture 'perspective' of the Balanced Scorecard is designed to increase visibility of some existing EDI measures in relation to Brent staff.

8.0 Climate Change and Environmental Considerations

8.1 Indicators that support delivery of the Brent Climate Emergency Strategy are included in the 'Cleaner, Greener Future' section of this report and in the first iteration of the Corporate Balanced scorecard.

9.0 Human Resources/Property Considerations (if appropriate)

9.1 There are none.

10.0 Communication Considerations

10.1 There are none.

Related document(s) for reference:

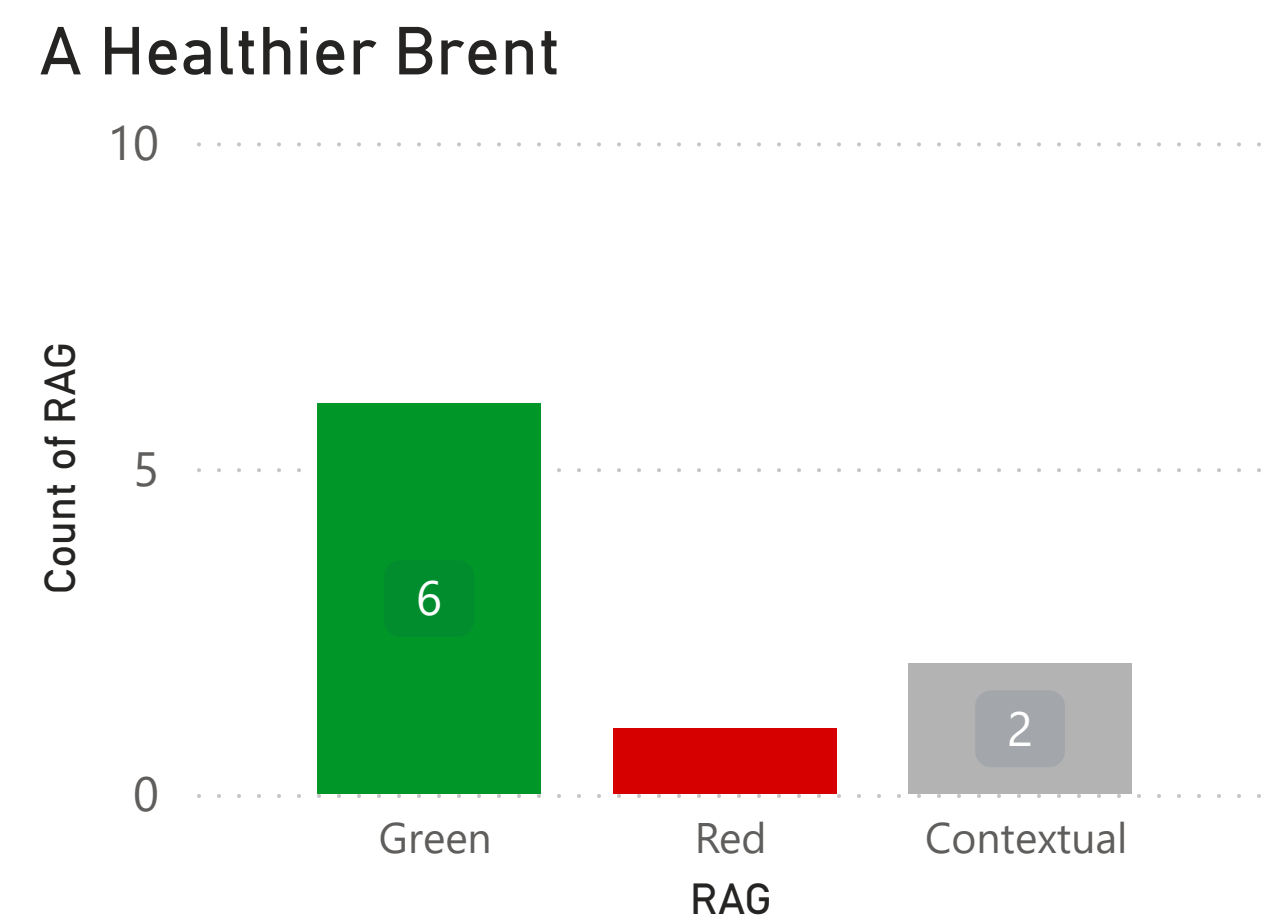
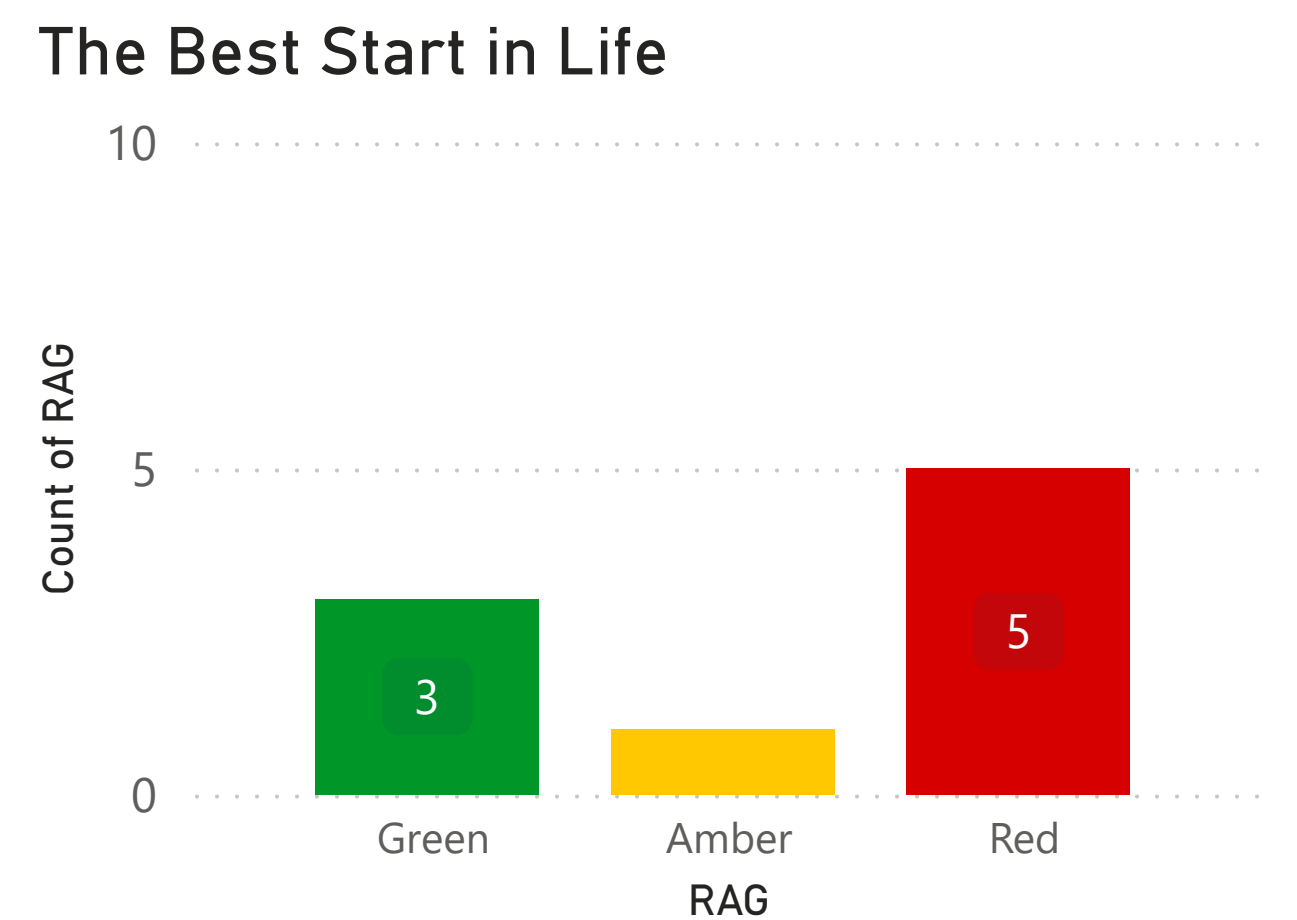
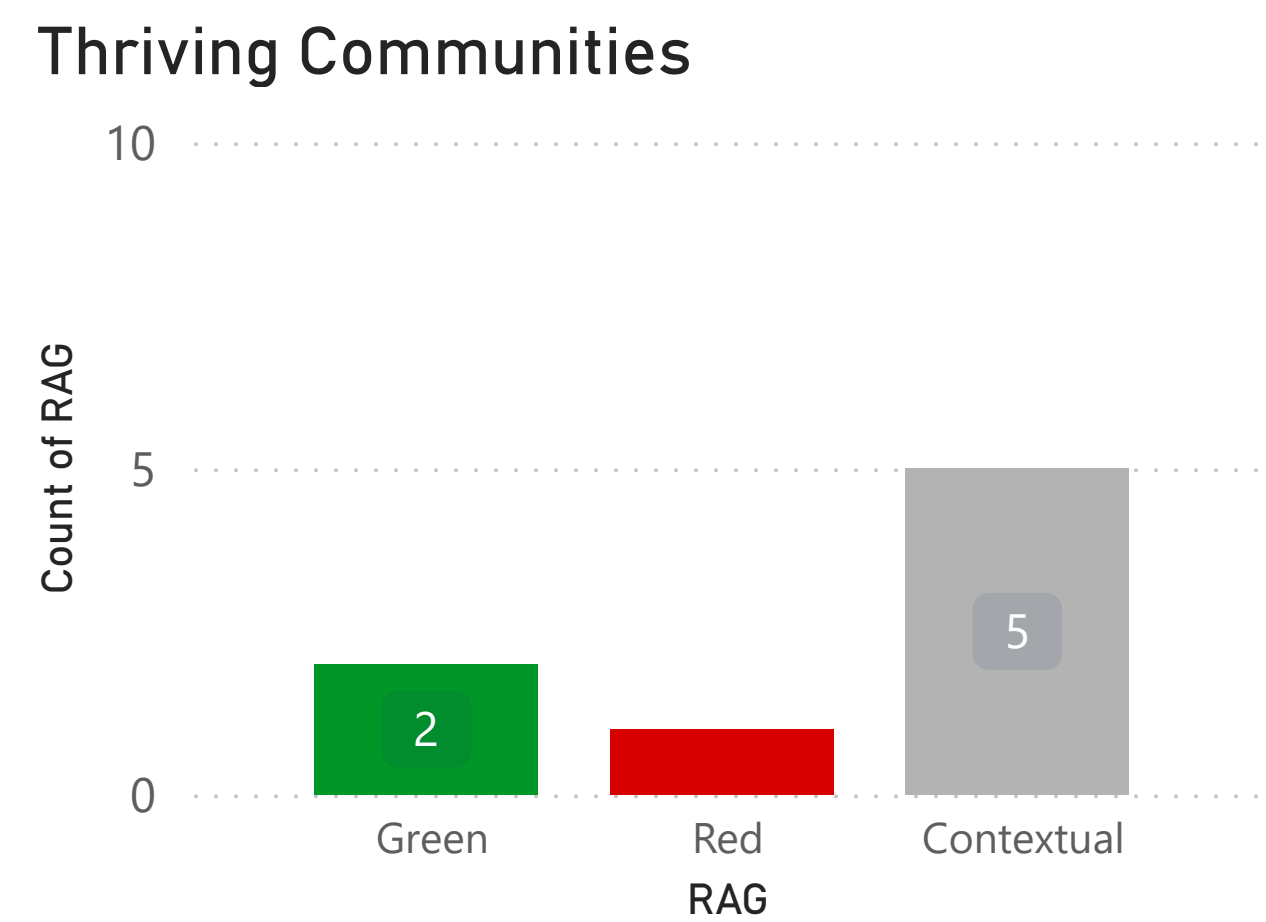
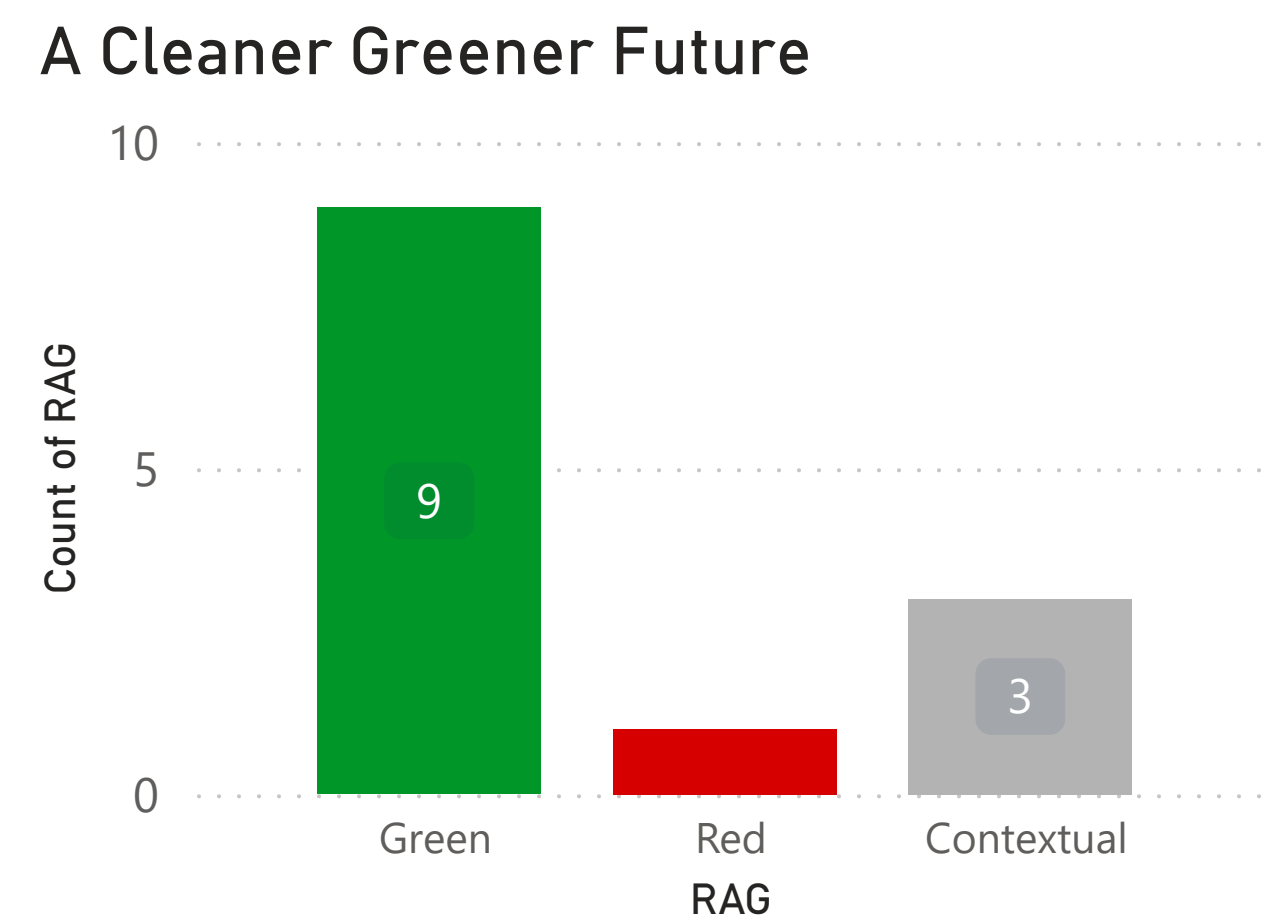
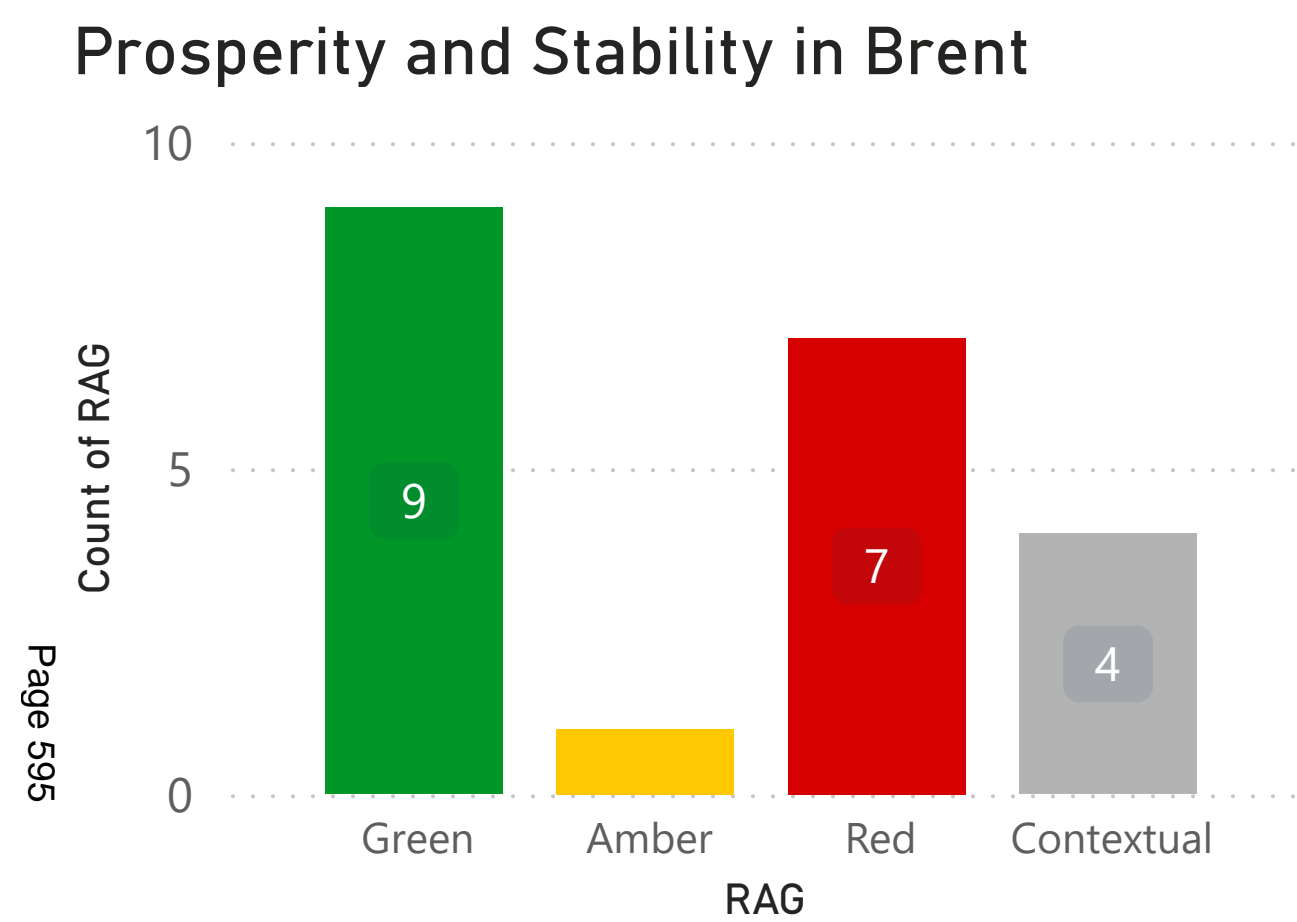
Cabinet report 16 June 25: (Q4 Corporate Performance update 2024-25)

Report sign off:

Rachel Crossley

Corporate Director, Service Reform
and Strategy

Corporate Performance Report - 2025-26 Q1



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

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

Corporate Performance Report - 2025-26 Q1

Prosperity and Stability in Brent

G	Percentage of enquiries at the Community Hubs resolved at the point of con...	82.0%	Target: 80.0%	G	Percentage of Jobs secured paying LLW	83.0%	Target: 80.0%	G	Brent Works: Apprenticeship Outcomes	13	Target: 12	G	% of BAME staff (Overall & Senior)	71.6%	Target: 65.0%
G	Number of empty properties refurbished and brought back in to use within the bo...	15	Target: 12	G	Number of residents accessing Community Hubs	4,564	Target: 3,500	G	Number of local suppliers we use in Brent	33.0%	Target: 25.0%	G	Number of local apprenticeships/work experience opportunities (i...	44	Target: 20
G	Increase in the number of job and apprenticeship opportunities across the b...	11	Target: 1	A	Average days taken to process new benefit claims	23.72	Target: 22.00	C	Number of affordable homes delivered by external providers (incl. S.106)	70	Contextual	C	Number of council homes delivered	115	Contextual

Corporate Performance Report - 2025-26 Q1

Prosperity and Stability in Brent

C	Number of referrals to food banks made through Brent Hubs	497	Contextual	C	Total applications made for the Resident Support fund (Digital support package) a...	328	Contextual	R	Number of affordable homes delivered by i4B	1	Target: 4	R	Average days taken to process change events	7.25	Target: 5.00
R	Brent Works: Jobs Outcomes	27	Target: 37	R	Average number of days processing Resident Support fund	25.00	Target: 20.00	R	Number of households in Temporary Accommodation	2,411	Target: 2,100	R	Number of Houses of Multiple Occupation licensed within the borough	4,798	Target: 5,500
R	Brent Start overall achievement per academic year (July-Sept)	86.0%	Target: 93.0%												

Corporate Performance Report - 2025-26 Q1

A Cleaner Greener Future

G	Reported and inspected category 2 defects repaired on time	100.0%	Target: 98.0%	G	% of residential fly-tips completed by the contractor within 48hrs	98.4%	Target: 95.0%	G	Annual % carbon emissions reduction from council own estate and operations sinc...	71.7%	Target: 77.5%	G	Total number of kilograms of residual waste collected per household	97	Target: 105
G	Proportion of borough schools with a school street scheme (%)	44.0%	Target: 38.8%	G	Brent Recycling Rate	35.0%	Target: 30.0%	G	Number of Fly-tipping incidents investigated	4,374	Target: 3,000	G	Improved Street Cleansing (Litter)	2.9%	Target: 9.0%
G	Number of bike hangers	153	Target: 41	C	Fly tipping – formal enforcement actions	904	Contextual	C	No. of community projects awarded Together Towards Zero funding	80	Contextual	C	No. of council housing stock (domestic) retrofitted with at least one energy efficiency...	1,073	Contextual
R	Number of EV charges programmed to be operational within the fina...	0	Target: 15												

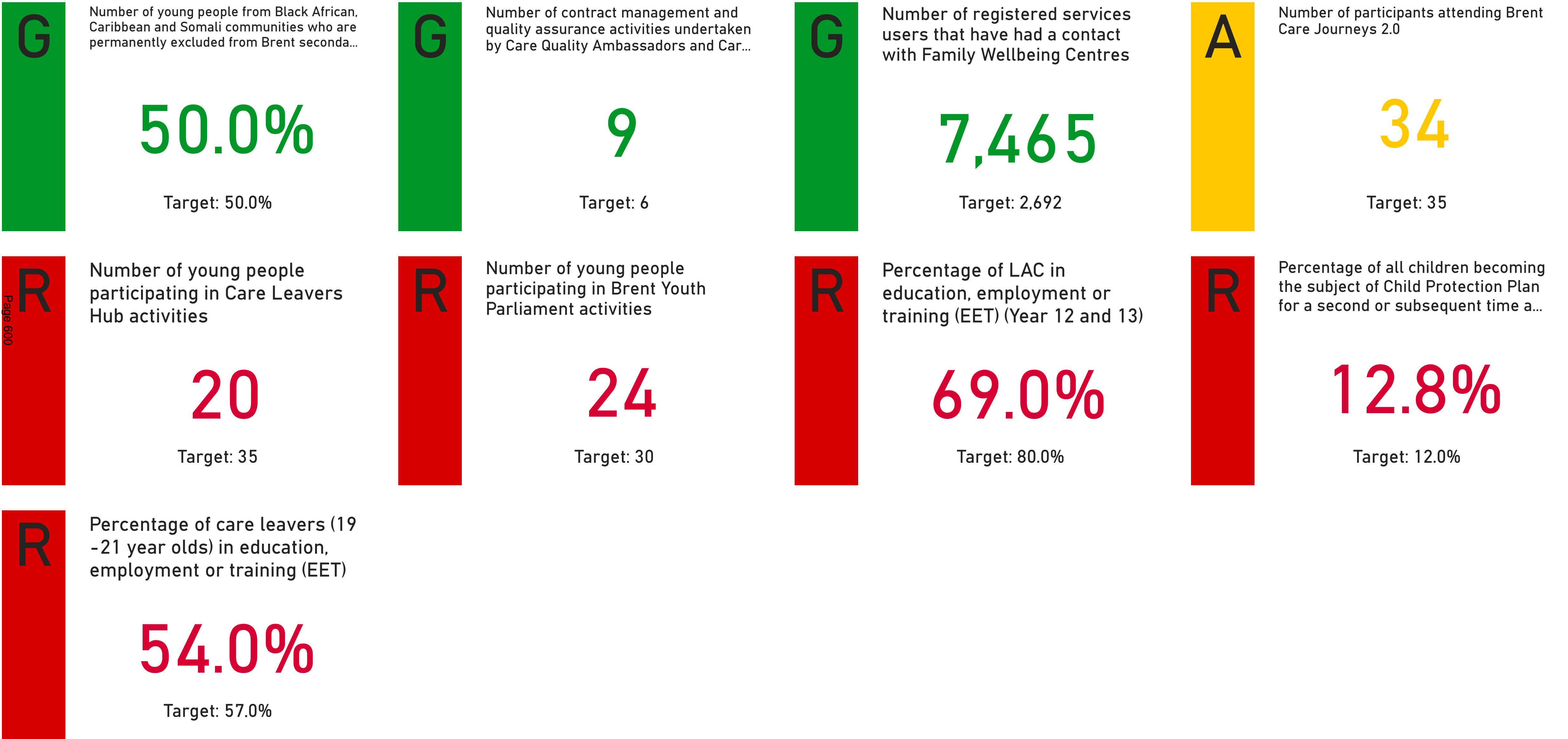
Corporate Performance Report - 2025-26 Q1

Thriving Communities

G	No of books issued including Home Library/Outreach Service and e-downloads	225,735	Target: 170,391	G	Library Visits	316,785	Target: 49,697	C	Increase in the number of engagement events that take place across the com...	74	Contextual	C	Total amount of funding awarded through grants	£0	Contextual
C	Total applications approved for the Resident Support fund	1,465	Contextual	C	Total number of grants awarded	0	Contextual	C	Total number of residents attending Brent Connects meetings	0	Contextual	R	Hours contributed toward supporting events within the community [SVEPP]	55.00	Target: 65.00

Corporate Performance Report - 2025-26 Q1

The Best Start in Life




Corporate Performance Report - 2025-26 Q1

A Healthier Brent

Page 601	<div>G</div> <div>Percentage of new birth visits within 14 days</div> <div>95.0%</div> <div>Target: 95.0%</div>	<div>G</div> <div>Total number of adults in structured drug and alcohol treatment</div> <div>1,429</div> <div>Target: 1,425</div>	<div>G</div> <div>BHM programme: No. of orgs reached out to and engaged with</div> <div>513</div> <div>Target: 500</div>	<div>G</div> <div>Reablement sequel to service</div> <div>82.3%</div> <div>Target: 75.0%</div>
	<div>G</div> <div>BHM programme: No. of health-checks completed at events</div> <div>1,142</div> <div>Target: 1,000</div>	<div>G</div> <div>BHM programme: No of community events held</div> <div>242</div> <div>Target: 175</div>	<div>C</div> <div>Long term support needs of older adults met by admission to residential and nursing care homes per 100,000 population</div> <div>43.20</div> <div>Contextual</div>	<div>C</div> <div>Long term support needs of younger adults met by admission to residential and nursing care homes per 100,000 population</div> <div>3.50</div> <div>Contextual</div>
	<div>R</div> <div>% of assessments completed within 28 calendar days (excluding SMART and OT as not care act)</div> <div>39.0%</div> <div>Target: 80.0%</div>			

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	<p align="center">Cabinet 13 October 2025</p>
	<p>Report from the Corporate Director Neighbourhoods and Regeneration</p>
	<p>Lead Member – Cabinet Member for Regeneration, Planning & Property (Councillor Teo Benea)</p>
<p>Brent Purpose Built Student Accommodation Planning Position Statement</p>	
<p>Wards Affected:</p>	<p>All except parts of Alperton, Harlesden and Kensal Green, Stonebridge and Tokyngton, where OPDC is the Local Planning Authority.</p>
<p>Key or Non-Key Decision:</p>	<p>Key</p>
<p>Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</p>	<p>Open.</p>
<p>List of Appendices:</p>	<p>One Appendix A: Brent Planning Position Statement for Purpose Built Student Accommodation</p>
<p>Background Papers:</p>	<p>London Plan March 2021 Purpose Built Student Accommodation LPG October 2024 Brent Local Plan 2019-2041</p>
<p>Contact Officer(s):</p>	<p>Paul Lewin, Spatial and Transportation Planning Manager 020 8937 6710 paul.lewin@brent.gov.uk</p>

1.0 Executive Summary

- 1.1. Cabinet is requested to consider recent trends for purpose-built student accommodation (PBSA) both delivered and within the pipeline within Brent, and the potential impact if current trends are perpetuated on meeting housing need and providing balanced and mixed communities, particularly in the Wembley Growth Area and approve publication of a Brent PBSA Planning Position Statement for consultation. This sets out the Council's position that in advance of the review of the Brent Local Plan, a temporary pause on additional PBSA planning consents other than those which have reached an advanced stage in negotiation, should occur for Wembley Growth Area. The position statement

will be issued for a period of consultation, and after considering the responses the Council will decide whether to adopt it as a material consideration in the determination of planning applications.

2.0 Recommendation(s)

- 2.1 That Cabinet considers the recent trends of purpose-built student accommodation in Brent, the relevant planning policy provisions, the role of the accommodation in addressing a wide range of positive outcomes, and the need for balanced and mixed communities.
- 2.2 That Cabinet approves the Brent Planning Position Statement for Purpose Built Student Accommodation as set out in Appendix A for consultation.
- 2.3 That Cabinet delegates authority to the Corporate Director Neighbourhoods and Regeneration in consultation with the Cabinet Member Regeneration, Planning and Property to consider the consultation responses, the need for any changes, and whether to adopt the Brent Planning Position Statement for Purpose Built Student Accommodation and for this to be a material consideration in respect of decisions on planning applications.

3.0 Detail

Cabinet Member Foreword

- 3.1 The Council embraces the opportunities that development can bring in improving the social, economic and environmental prospects of Brent. It has consistently been one of London's top performers in delivering new homes and accommodation to meet its, as well as wider London's, needs. This has been an integral part of the positive transformational changes that have and will occur across the borough, particularly in its growth areas, such as Wembley.
- 3.2 London's higher education institutions are world renowned and support its and the UK's role in providing quality education and research that supports social, economic and environmental sustainability. The presence of higher education institutions in Brent is limited. However, the size of the sector in London, together with limited opportunities centrally to accommodate students, means Brent does and will play a role in housing students. Increasingly purpose-built student accommodation (PBSA) will meet those accommodation needs.
- 3.3 Brent has provided a substantial number of PBSA bedspaces in the last decade. Currently there is substantial interest in the sector, with activity elevated significantly when compared to conventional housing proposals. However, in Wembley if recent trends were to be continued for the next three years, there is the prospect of a potential imbalance in Brent priority housing needs being met and longer term an unbalanced and mixed community occurring. To address this in advance of the Brent Local Plan review, a planning position statement will provide clarity. This is not new policy but clarifies the Council's interpretation of what it considers to be an acceptable concentration of PBSA in supporting balanced and mixed communities.

3.4 The position statement provides a positive framework for managing development to meet the borough plan priorities as follows:

1. **Prosperity and Stability in Brent** – The statement seeks to address housing needs of Brent's population whilst balancing that with providing for PBSA to support London's needs. PBSA is a strong development sector, attracting inward investment. This can be important, particularly in the early stages of delivery of ambitious regeneration schemes, or subsequent in maintenance of their delivery rates, contributes to housing delivery targets and brings with it a population that increasingly has a higher representation of foreign students with significant spending power, supporting Brent's economic base.
2. **Thriving Communities** – Addressing the provision of balanced and mixed communities will help create places that are sustainable in the longer term. A strengthened sense of place helps to improve development outcomes and create a sense of belonging which contributes towards community cohesion.
3. **The Best Start in Life** – A principal determinant of future life chances for younger people is having a stable accommodation, including a home that is affordable, has sufficient space to live and growth in and internally provides a healthy environment. The interim statement helps support additional conventional priority affordable housing needs.

Background

3.5 PBSA typically is for full-time students in higher education. In Brent it has been new-build predominantly multi-bedroom 'cluster flats' (linked to kitchen/ dining/ living rooms) and additional shared amenities targeted at student lifestyles and support (e.g. for socialising, studying, laundry, health and wellbeing). More recently the sector has sought to move towards more studio units with shared amenities. Accommodation is managed either by a university or a specialist landlord with rooms/ bed spaces let individually, usually for an academic year.

Brent and its role in supporting PBSA

3.6 Brent has one higher education institution campus, University of Westminster at Northwick Park, which has some PBSA (150 bedspaces) on site. Over the last decade or so the amount of PBSA in Brent has grown significantly. 6,257 bedspaces are now completed, 1,617 under construction 1,559 either permitted or planning committee has approved in principle, subject to some outstanding issues being satisfactorily addressed. 2,010 bedspaces applications are yet to be subject to decision and 918 bedspaces are in relatively advanced discussions having received advice that the principle of PBSA is acceptable prior to submission of an application. Most of the provision is within Wembley Growth Area, albeit other Growth Areas are now starting to be subject to greater interest.

- 3.7 Notwithstanding Brent's limited representation of higher education institutions, it is recognised that it does have a role to play in supporting the student accommodation needs of London. The London Plan's existing and emerging evidence base indicates there is a strong need for additional PBSA. This reflects the volume of institutions and their student numbers. Being able to offer accommodation guarantees (e.g. to first-year students) through PBSA is important to the institutions competing for students domestically and internationally and contributes to their ongoing viability, growth and world-class status. Some students welcome 'all-inclusive' rents which allows for more predictable bills and budgeting. The quality of the accommodation with dedicated study, sleeping and social spaces that are well designed and maintained, can also be an attractive feature for students.
- 3.8 Central London boroughs where most institutions are located have significant accommodation supply constraints and an inability locally to address this. This is mostly due to lack of sites for PBSA, but the associated expense of delivery also would result in very high accommodation costs for students. Outer London boroughs have less of these limitations; thus, well-connected locations are attractive to PBSA operators and students who may study centrally.

Additional benefits of PBSA

- 3.9 Across the wider London housing market, in the longer term the provision of PBSA will help reduce students living in housing or houses in multiple occupation. This will free up potential capacity within that accommodation to meet more conventional housing needs. To reflect this, PBSA schemes are counted towards housing delivery targets with 2.5 bedspaces being regarded as equivalent to 1 dwelling.
- 3.10 PBSA can be beneficial to supporting regeneration areas. Often it can act as a 'pioneer' use supporting earlier phases of delivery and give confidence to other developers to bring forward other sites. Due to the pent-up need, investment in the sector tends to be more consistent, with it less likely to be subject to the extremes in delivery that can occur for conventional housing impacted by economic cycles. It helps support the Council's housing delivery test compliance.
- 3.11 Overseas students, a higher proportion of who occupy PBSA often have a high disposable income and therefore along with other students in PBSA can contribute significantly to local economies through their purchasing power.

Development Plan Policy and Guidance

- 3.12 PBSA is subject to policies both within the London Plan 2021 (Policy H15 Purpose Built Student Accommodation) and the Brent Local Plan 2019-2041 (Policy BH7 Accommodation with Shared Facilities or Additional Support). Both are supportive of PBSA subject to a range of criteria being met. The policies however do reference the need for the provision of PBSA to avoid an over-concentration (BH7) and support balanced and mixed communities (H15). This issue has been given greater consideration in the recently adopted PBSA

London Plan Guidance. It is becoming evident that some boroughs appear to be becoming the predominant locations for PBSA investment activity. This is raising concerns within them about the imbalance of PBSA activity compared to conventional housing and impacts on achieving borough priority housing needs.

Brent Priority Housing Needs

- 3.13 Brent like other London boroughs is impacted by the lack of housing supply compared to needs. Providing more homes to meet needs is one of the Council Borough Plan's key priorities. Brent historically has done comparatively well and is within the top 3 for delivery of new homes in London over the last 10 years. Notwithstanding this, needs for affordable homes and family sized homes are acute and in the last couple of years have become more so. The Council has seen the number of people presenting as homeless increase by 23% in the 3 years to August 2024 with 140 households becoming homeless each week. This has continued to rise, with more than half of these homeless now housed in temporary accommodation.
- 3.14 During this time conventional housing delivery has slowed significantly, despite over 8000 homes having planning permission, completions in 23/24 being 656 net additions, or less than a third of the 2325 required. A multiplicity of factors including construction costs and availability of materials, lack of construction labour, building safety issues, reduction in help to buy and buyer confidence/ability to attain mortgage finance has impacted viability and delivery. At the same time investor interest in PBSA has increased, with PBSA now being promoted on some sites previously consented for conventional homes.
- 3.15 This has brought concerns from councillors that provision and prioritisation of PBSA is reducing the ability of Brent to meet more pressing conventional housing needs. Whilst student accommodation is displacing some conventional homes schemes, in the context of Brent's overall housing stock the number of PBSA units existing and potentially coming forward currently is relatively small. The issues with conventional housing delivery currently are so severe that limiting PBSA provision would arguably do little to support additional conventional housing delivery.

Wembley Growth Area

- 3.16 As identified however, the spatial distribution of PBSA provision has been focussed on Wembley Growth Area where to date 6058 bedspaces have been constructed. Currently 21.8% of the Growth Area's population is students either in PBSA or in all student households renting homes.
- 3.17 A further 1617 PBSA bedspaces are under construction and planning committee has been minded to approve 759 more bedspaces, subject to an appropriate S106 obligation. Some sites are subject to current applications and others are also in relatively advanced pre-application discussions where the principle of PBSA has been identified as acceptable. If all delivered, a further 3500 student bedspaces could be supplied in the next 3 years, resulting in 9558

bedspaces in total. It is anticipated that 1871 additional dwellings will be completed in the area in the next 3 years. Students would in three years comprise 26.8% of the overall population.

- 3.18 In the short term this is not considered to be a mixed and balanced population. However, development is often cyclical, and officers have been mindful of the overall predicted future population when considering the acceptability of these student schemes. Wembley Growth Area has a substantial number of conventional homes either with planning permission or that are predicted to be developed on site allocations by 2041. If no additional PBSA above that identified to be delivered in the next 3 years, were provided in the period to 2041, the student population would return to 20.8%. This is closer to levels that historically have been identified as appropriate number in policy (Wembley Area Action Plan).
- 3.19 Given the short-term projected population imbalance however, and the sustained strong interest in promoting PBSA schemes, it is considered that it would be appropriate for the Council to clarify its position in the short term in relation to additional PBSA schemes in Wembley Growth Area. A continuation of the trend seen in the last three years adding to that which is already in the pipeline to the amount of PBSA in the Growth Area is not considered appropriate. As such, the Council can indicate that it wishes to see a pause in additional PBSA schemes in Wembley Growth Area other than those consented, submitted as applications or in advanced pre-application discussions where the principle of PBSA has already been indicated as acceptable. In other Growth Areas the issue is less acute, but similarly the statement can identify that monitoring potential over-concentration will occur, with the Council clarifying it may seek similar pauses should it be required.
- 3.20 As this is an interpretation of policy in relation to clarifying the position in terms of PBSA over-concentration/ supporting balanced and mixed communities, rather than writing new policies, it is suggested that the Council issues a policy position statement. Although not officially recognised in planning statutes as a Local Development Document or perhaps having the weight of a Supplementary Planning Document (SPD), if consulted upon and following the same processes as a SPD, once adopted by the Council it can be regarded as a material consideration in the determination of planning applications with some weight.
- 3.21 As the Council will start its Local Plan review process more formally next year, the position statement can be an interim solution. The Local Plan will allow the Council to more fully consider its policies in respect of PBSA provision in the borough, and issues such as over-concentration, and the priority given to PBSA compared to other conventional housing to meet Brent's needs to be clarified and tested more rigorously.

PBSA Schemes Addressing Conventional Housing Needs

- 3.22 Although PBSA schemes may not currently address conventional housing needs directly, new schemes coming through the planning process could

potentially do so more specifically. More recently the Council has been able to negotiate provision of an affordable housing payment in lieu to meet borough housing needs instead of the provision of affordable student housing within schemes. This would partially address the limited activity in respect of conventional housing currently coming forward, which in turn is limiting affordable housing delivery. Given the interest in PBSA there is also the potential for the Council to seek to encourage its development to potentially incorporate some conventional affordable housing in separate blocks on site that could meet priority needs. This could support delivering homes that in the short term may otherwise not be delivered due to the lack of viability/ market desire to deliver conventional homes. Both these matters have been addressed in the position statement attached in Appendix A.

- 3.23 Additionally, the potential for PBSA students to better integrate into and support Brent social, economic and environmental outcomes through, for example, volunteering is also encouraged in association with the policy aim of seeking to support mixed and inclusive neighbourhoods.

Options

- 3.24 There are potentially two options open to the Council:

- a) Take forward the Brent Planning Position Statement for Purpose Built Student Accommodation.
- b) Do not take forward the Brent Planning Position Statement for Purpose Built Student Accommodation

Option a) Take forward the Brent Planning Position Statement for Purpose Built Student Accommodation.

- 3.25 This will provide clarity to prospective developers or investors in PBSA, particularly in Wembley Growth Area that, other than schemes already subject to approval or with clear advice from the Council through the pre-application process that the principle of PBSA is currently acceptable, the Council is unlikely to support their scheme in the short term.
- 3.26 Such an approach will allow a pause to occur and for the Council to get a better understanding of whether this should be a more permanent situation to be taken forward in a local plan review, or whether additional PBSA sites can be supported in the future. This will allow those developers to make an informed decision as to whether to continue to seek to move forward with PBSA on sites or invest the funds elsewhere in a location more likely to be viewed positively.
- 3.27 Setting out the Council's view of PBSA prioritising payments in lieu or on-site conventional housing/ affordable housing instead of affordable student accommodation is likely to lead to better outcomes for the borough in meeting its housing needs. For these reasons, this is the recommended option.

Option b) Do not take forward the Brent Planning Position Statement for Purpose Built Student Accommodation.

- 3.28 This will not provide clarity to prospective developers or investors in PBSA, particularly in Wembley Growth Area that, other than schemes already subject to approval or with clear advice from the Council through the pre-application process that the principle of PBSA is currently acceptable, the Council is unlikely to support their scheme. This will not allow those developers to make an informed decision as to whether to continue to seek to move forward with PBSA on sites or invest the funds elsewhere in a location more likely to be viewed positively. This could lead to prospective schemes in Wembley being refused permission, with the associated resource implications for the developer.
- 3.29 Not setting out the Council's view of PBSA prioritising payments in lieu or on-site conventional housing/ affordable housing instead of affordable student accommodation will either lengthen the decision-making process to allow such changes to be made to a development, or mean affordable student accommodation is delivered, which would likely result in poorer outcomes for the borough in meeting its housing needs. For these reasons, option b) is not the recommended option.
- 3.30 On this basis, option a) is the recommended option.

Next steps

- 3.31 The Council will follow the steps normally applied to a SPD as set out in The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). This includes a minimum of 6 weeks consultation, consideration of the responses and if necessary, amendments to the position statement, prior to the consideration of whether to adopt it.
- 3.32 To reduce Cabinet business it is recommended that Cabinet delegates authority to the Corporate Director Neighbourhoods and Regeneration in consultation with the Cabinet Member Regeneration, Planning and Property to consider the consultation responses, the need for any changes, and whether to adopt the Brent PBSA Planning Position Statement and for this to be used by officers and planning committee as a material consideration on which they should place some weight in respect of decisions on planning applications.

4 Stakeholder and ward member consultation and engagement

- 4.1 The appropriate levels of consultation and engagement consistent with the Council's Statement of Community Involvement regarding Supplementary Planning Documents will be undertaken.

5 Financial Considerations

- 5.1 The activities arising in producing and adopting the position statement are consistent with those typically associated with planning policy work and will be

addressed within the existing resources available to the policy team with regards to the establishment and revenue budget.

6 Legal Considerations

- 6.1 The processes will be consistent with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Prior to adoption by the Council, the position statement will have some limited weight in the determination of planning applications, post adoption the weight will increase.

7 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 The Equality Act 2010 introduced a new public sector equality duty under section 149. It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Council must, in exercising its functions, have 'due regard' to the need to:
- a) Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - b) Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - c) Foster good relations between people who share a protected characteristic and those who do not.
- 7.2 The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.
- 7.3 The planning position statement has been subject to Equalities Impact Assessment screening. The statement interprets existing London Plan and Brent Local Plan policy and London Plan Guidance, rather than introducing new policy. It clarifies that it considers no additional PBSA is appropriate beyond that which has been subject to at least some form of confirmation of its acceptability in principle, either by planning committee or officers through the pre-application process for Wembley Growth Area. This will limit the additional provision of PBSA which might have otherwise come forward (albeit not certain that such development would have come forward as it could in any case have been refused based on the policy). This potentially disproportionately impacts 18–21-year-olds and foreign nationals in higher education who will have a higher representation amongst those impacted compared to the general population. This could result in prospective occupiers of additional PBSA that might otherwise have been built being accommodated in a poorer standard of accommodation. In respect of foreign nationals, it may reduce their likelihood of applying to study at London institutions.
- 7.4 The Council's approach to prioritising payment in lieu of affordable student accommodation for use for other forms of affordable housing to meet Brent

needs may also adversely affect those students from disadvantaged backgrounds unable to afford full market PBSA rents.

- 7.5 In limiting additional PBSA in Wembley Growth Area, this will prioritise site allocations and future windfall housing sites for types of homes that address more conventional Brent priority housing needs. Due to Brent's population characteristics, for more general conventional housing this will be beneficial to ethnic minority groups who comprise more of the population than nationally. In addressing affordable housing, this will also be beneficial to the more economically disadvantaged in allowing them to meet their housing need. These people comprise greater representation from ethnic minority groups and the disabled than the wider national population.

8 Climate Change and Environmental Considerations

- 8.1 There are no specific impacts related to the position statement. For example, both PBSA and conventional homes developments are subject to similar environmental standards policies. In respect of being required to reduce carbon emissions both must reduce energy use and maximise use of renewables to achieve a minimum 35% reduction on building regulations standards and achieve net zero on site or through carbon off-set payment.

9 Human Resources/ Property Considerations

- 9.1 There are no specific impacts related to the position statement.

10 Communication Considerations

- 10.1 Consistent with the approach to supplementary planning documents, there will be an appropriate level of communication's team support to raise awareness, e.g. through press releases/ council social media notifications to complement the engagement measures set out in the Councils' Statement of Community Involvement. Councillors will be made aware of the consultation through the members' bulletin. The Council's consultation portal on the website will be used to host the consultation. Those on the Council's planning policy database will be notified of the consultation.

Report sign off:

Jehan Weerasinghe

Corporate Director Neighbourhoods and
Regeneration

Appendix A

Brent Position Statement on Purpose Built Student Accommodation October 2025

1 Executive Summary

- 1.1 Brent has had substantial growth in purpose-built student accommodation (PBSA) over the last decade. Wembley Growth Area has been particularly attractive to PBSA operators, with 7675 bedspaces either built or under construction. Students represent approximately 21.8% of the growth area's current population.
- 1.2 For Wembley, a further 1687 bedspaces are subject to applications or have been subject to positive pre-application discussions which are likely to become full applications where the principle of student use has been regarded as appropriate. If these are delivered in the short term (3 years) together with projected conventional housing completions, the student population would rise to 26.5%.
- 1.3 This percentage, if perpetuated for all future residential development activity in the period to 2041, is not considered by the Council to be a balanced/ mixed community for the area. The 9362 bedspaces are however acceptable in the context of the projected population of the growth area (with growth coming from conventional housing completions) to 2041. If this PBSA number remained the same, students would represent 20.6% of the growth area's population, which the Council has previously in policy identified it is broadly content with.
- 1.4 Given the substantial interest in PBSA for Wembley, there is significant potential for further sites other than those already put forward to be promoted for PBSA in the short term. Due to this prospect, if current trends are perpetuated, the student population could go significantly above 20% by 2041. The Council does not want to see this occur and the population become unbalanced longer term. As such, the Council wishes to initiate a pause in this trend. It is unlikely to support further PBSA permissions (outside those already submitted or in advanced pre-application discussions where the Council has agreed the principle of PBSA) in the growth area.
- 1.5 The Council is making this clear so that this will prevent prospective developers promoting PBSA schemes, with the associated resource risks, where there are places in London (and beyond) where that resource is more likely to result in a planning permission.

- 1.6 Notwithstanding Brent's limited higher education institutions, it does recognise it has a role in supporting provision of PBSA. In other Brent growth areas, whilst there has been some PBSA interest, the issue is not so acute in terms of percentage of the areas' future population. Currently there is no suggested potential for over-concentration for these areas. This, however, will be kept under review particularly if it becomes clear that students could become significantly more than 20% of a growth area's predicted population.
- 1.7 The Council during the next three to four years is likely to have progressed its Local Plan review to a point where its policies might have some weight. This will provide greater clarity on how large the population of the Wembley growth area is likely to be. It will also allow a move towards a more clearly defined policy approach on the acceptable level of student population the Council supports in growth areas.
- 1.8 For PBSA schemes at pre-application stage yet to be determined, the Council wishes to better address its own local housing priorities, particularly in delivering affordable housing. In this respect it will seek to pursue a financial contribution towards affordable housing to meet the borough's needs, rather than the PBSA scheme delivering affordable student accommodation.
- 1.9 For potential PBSA sites outside the Wembley Growth Area that have not yet been subject to pre-application discussions, the Council will encourage schemes that support the delivery of more conventional homes, priority housing such as specialist older person's housing (as set out in policy BH8), and affordable housing that can meet Brent's needs. This could include the delivery of a separate affordable housing block, rather than affordable student bedspaces. Where these options are not feasible, the Council will seek a financial contribution to affordable housing. All these options will be prioritised over the provision of affordable student accommodation.
- 1.10 The Council wishes to encourage greater interaction between PBSA students and the wider community to create mixed and inclusive neighbourhoods in Brent. In this respect it will support PBSA schemes that promote student engagement in local life, for example through volunteering and collaboration with residents and third-sector organisations, to enhance Brent's social, economic and environmental outcomes.

2 Existing Student Accommodation Policies

- 2.1 The London Plan 2021 Policy H15 and the Brent Local Plan 2022 Policy BH7 support the provision of additional student accommodation. Both policies recognise that Purpose Built Student Accommodation (PBSA) meets a London wide need for student accommodation. In terms of an appropriate spatial distribution, neither policy sets a specific limit on what might be considered acceptable. Policy H15 is supportive provided that “at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood”, whilst BH7 is too, providing that it “will not lead to an over-concentration of the type of accommodation in the area.”
- 2.2 Brent’s Local Plan identifies that site allocations for residential purposes are appropriate to accommodate a wide range of residential uses including PBSA. It does not seek to identify or prioritise specific sites for any form of homes, including PBSA.
- 2.3 The Council is aware that in economic cycles, the residential accommodation types which are most attractive to the investment/ developer community will vary, with specific sectors, e.g. PBSA, being more attractive at certain times, whilst at other times, smaller homes, or larger family homes may be more attractive.
- 2.4 The Local Plan policies have been loosely framed to allow for flexibility and be able to support development in what might be changing economic conditions, or changes in preference of site characteristics for residential providers.
- 2.5 More recently, the Mayor of London’s London Plan Guidance on Purpose-built Student Accommodation was published in November 2024. It acknowledges that some boroughs, including those in outer London, have seen a particularly high influx of PBSA schemes in recent years. It identifies that in some boroughs this has given rise to concerns about housing mix in their neighbourhoods and the potential ‘crowding out’ of conventional housing, given other types of housing need amongst their population.

3 Higher Education Establishments and Brent

- 3.1 The Local Plan policies have been loosely framed to allow for flexibility and be able to support development in what might be changing economic conditions, or changes in preference of site characteristics for residential providers.

- 3.2 Brent has only one small campus of a higher education establishment (University of Westminster at Northwick Park). This has some PBSA on site (150 bedspaces) and is subject to an outline planning permission that would allow more. Many of the higher education institutions are in central London, where there are significant constraints to finding new sites for PBSA. Parts of Brent have good transportation links to central London, and it is recognised that Brent has a role to play in delivering PBSA to support London's higher education facilities.

4 Brent's other housing priorities

- 4.1 There is an intense lack of supply of homes in Brent, with a particularly acute affordable housing need. New supply has also diminished in the last year or two due to a range of housing delivery factors, prevalent across much of London. On the other hand, the Council has seen the number of people presenting as homeless increase exponentially in this time. This means that the Council is finding it very hard to house people. It is increasingly having to place people in temporary accommodation in Brent or, in a growing number of cases, elsewhere.

5 Purpose Built Student Accommodation

- 5.1 For new major developments over the last two years, PBSA has become more predominant as the proposed residential typology. The principal interest has been within Wembley Growth Area. Interest in other areas has to date been more limited, albeit PBSA schemes are currently being proposed in Neasden (1040 bedspaces), Northwick Park (800 bedspaces) and Cricklewood (826 bedspaces) with other growth areas subject to pre-application discussions.
- 5.2 In some cases, sites with housing consents are being promoted for PBSA instead. Given the acute local housing need, there are concerns from councillors that Brent's ability to meet its priority housing needs are being displaced by accommodation that does not specifically meet Brent's needs.
- 5.3 PBSA operators often indicate that their premises will help free up places in existing dwellings occupied by students to meet wider housing needs. This is difficult to verify, as Brent is part of the wider London housing market. Meaningful comparison between the last two census is difficult as it appears Census 2021 has significantly under-represented higher education students living in Brent. Whilst it may be true there may be

some transfer, for the most part it is considered that new PBSA adds to Brent's student population, rather than effectively redistributing it by making more homes available for Brent's general housing needs. It is not clear if there is a direct link, but it is also possible PBSA in Wembley has encouraged more student occupation of conventional homes. Within Wembley growth area newer private rented homes are being wholly let to students at much higher levels than the rest of the borough. This might be through those considering PBSA becoming aware of the availability of homes in Wembley, or occupants when leaving PBSA moving into homes.

6 Wembley Growth Area

- 6.1 Brent has seen a substantial increase in PBSA over the last 12 years and Wembley has been the place to date where this has principally occurred. Here there are now (June 2025) 6058 PBSA bedspaces constructed. These have been in Wembley Park. A further 1617 bedspaces are under construction (most along Wembley High Road). Planning committee has been minded to grant 759 more bedspaces in Wembley Park, subject to an appropriate S106 obligation. In total this is 8434 student bed spaces.
- 6.2 Within the Wembley Growth Area there are currently (June 25) 12130 dwellings. Most of these properties are smaller in terms of number of bedrooms than the Brent average. This is because nearly all homes are flats, most are medium/ high rise, and recent developer focus has been on one and two bed homes. Relatively few homes are social rent (typically highest levels of occupancy per bedroom), some are owner-occupied (typically with the lowest levels of occupancy per bedroom), and the majority are privately rented.
- 6.3 Determining a definitive population of the Wembley Growth Area is not easy. Its boundaries are not contiguous with any wards or smaller census output areas. The Council has therefore estimated the existing and future population using 2021 Census data for the Wembley Park ward. It is considered that this provides the best ability to estimate average occupation of dwellings across the growth area. It is almost 100% flats, which is similar across the wider growth area. Future development in the area in terms of housing type, sizes and affordable ratios is likely to be like that already delivered. The Council is using an assumed occupancy level of 2.16 people per dwelling, which is the average household size for Wembley Park ward.
- 6.4 When looking at the 12130 dwellings in the area, 452 are currently subject to whole Council tax discount due to their occupation by students.

- 6.5 This gives a non-student population in Wembley Growth Area of 25244 in dwellings.
- 6.6 The student population in dwellings is an estimated 976 (assuming the same household size as conventional homes occupation). When added to the number of students in PBSA, this gives a total of 7,034 students. As a proportion of the overall population, students currently represent 21.8%.
- 6.7 The increased interest in PBSA, however, has meant that with recent permissions yet to be completed, minded to approves¹, current planning applications and relatively advanced PBSA pre-application discussions, a further 3304 student rooms could be supplied in the next 3 years. This would lead to 9362 student rooms in the growth area. It is anticipated that 1871 dwellings will be completed in the next 3 years. If students occupy a similar proportion of these dwellings as currently, this will result in 151 additional students. This would lead to a student population of 10489, compared to the non-student population of 29115. Thus, students would comprise 26.5% of the overall population.
- 6.8 If no more student schemes were to come forward in the period to 2041 and all other housing sites were delivered (5422 dwellings have consent, 2429 dwellings are allocated and 517 bedspaces are in a co-living scheme), the population would increase by 19732. Of these, the student population would represent 736. The overall proportion of students would drop to 20.6% of the 2041 total population. This is more consistent with the amount that the Council previously in the Wembley Area Action Plan indicated it would regard as an acceptable concentration within the growth area.

7 The Council's position on PBSA for the short term

- 7.1 Given the substantial interest in PBSA for Wembley there is significant potential for further sites to be promoted for PBSA by developers/landowners, or PBSA providers. These parties would usually enter into pre-application discussions before submitting a planning application to the Council.
- 7.2 For the Wembley Growth Area, the Council is concerned about the prospect of the student population to 2041 rising significantly above 20% if the current PBSA trends are perpetuated. The Council is therefore unlikely

¹ Planning applications which Brent's planning committee have voted to approve subject to the resolution of outstanding matters, for example the completion of a legal agreement.

to support PBSA permissions (outside those already in advanced pre-application discussions where the Council has agreed the principle of PBSA) in the growth area.

7.3 The Council is making this clear to prospective developers to reduce the risk of wasted resources. It would encourage those promoting PBSA to target other places in London where the resource, time and effort is more likely to result in a planning permission.

7.4 Notwithstanding Brent's limited higher education institutions, it does recognise that it has a role in supporting the provision of PBSA. In other Brent growth areas, whilst there has been some PBSA interest, the issue is not so acute in terms of percentage of the areas' future population and a risk of over-concentration occurring. Currently there is no suggested pause for these areas, although this will be kept under review particularly if it becomes clear that students could become more than 20% of the growth area's population. PBSA schemes proposed in these areas would be robustly assessed against the relevant policies and guidance in place.

8 How long will the Council maintain the view that it will not support additional PBSA in Wembley Growth Area?

8.1 The Council has set out its timetable for the Local Plan review. It is estimated that it will take 3-4 years for the draft replacement Plan to progress to an advanced stage where some weight can be attached to its policies. This will provide greater clarity on how large the population of the Wembley growth area is likely to be. It will provide a more clearly defined policy approach on the acceptable level of student population the Council will support in growth areas. This might provide the opportunity for it to identify that more PBSA in the area might be appropriate or confirm the current position that a point has been met beyond which additional provision will be regarded as an over-concentration and not supported in policy.

9 PBSA's ability to address Brent's Priority Housing Needs.

9.1 For PBSA schemes yet to be determined, the Council wishes to better address its own local housing priorities, particularly in delivering affordable housing. In this respect it will seek to prioritise a financial contribution towards affordable housing to meet the borough's needs, rather than the PBSA scheme delivering affordable student accommodation.

- 9.2 For sites outside the Wembley Growth Area that have not yet been subject to pre-application discussions, The Council will look more favourably on schemes that support the delivery of more conventional homes, priority housing such as specialist older person's housing (as set out in policy BH8) and affordable housing that meets Brent's needs. Alternatively, it will also look favourably on PBSA- led schemes that deliver a separate affordable housing block, rather than affordable student spaces.

10 PBSA's contribution to balanced and mixed communities.

- 10.1 Policy H15 is supportive of PBSA provided that "at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood". This requirement goes beyond demographic characteristics and relates to how occupants contribute to, and engage with, their neighbourhood. The Council wishes to encourage greater interaction between PBSA students and the wider community in Brent. To this end, it will support PBSA schemes that enhance student involvement in local life, for example, volunteering and collaboration with residents and third-sector organisations, to improve Brent's social, economic and environmental outcomes.
- 10.2 Many Higher Education and affiliated organisations already provide [such opportunities](#), and the Council would welcome their expansion to create more opportunities in Brent.
- 10.3 In addition, the London Plan Guidance on Purpose-built Student Accommodation recognises that publicly accessible uses within PBSA developments (such as shops, community facilities and meeting spaces), can benefit the local community while also offering students employment and volunteering opportunities. For example, [in Lewisham, Phoenix Community Housing](#) has partnered with Goldsmiths, University of London, to deliver a "good neighbours" scheme where students support residents aged 55 and over. The Council would support similar initiatives that promote student inclusion.