



Resources and Public Realm Scrutiny Committee

Tuesday 24 February 2026 at 6.00 pm

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

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

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

Membership:

Members

Councillors:

Conneely (Chair)
Kennelly (Vice-Chair)
S Butt
Dixon
Long
Lorber
Maurice
Mitchell
Molloy
Shah
L. Smith

Substitute Members

Councillors:

Aden, Afzal, Chohan, Collymore, Mahmood,
Ketan Sheth T. Smith and 1 vacancy.

Councillors:

Kansagra and J Patel

Councillors:

Clinton and Matin

Councillors:

Ahmadi Moghaddam and Gbajumo

For further information contact: Hannah O'Brien, Senior Governance Officer
Email: hannah.o'brien@brent.gov.uk

For electronic copies of minutes, reports and agendas, and to be alerted when the minutes of this meeting have been published visit: www.brent.gov.uk/democracy

Notes for Members - Declarations of Interest:

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

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

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

***Disclosable Pecuniary Interests:**

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

****Personal Interests:**

The business relates to or affects:

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

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

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

or

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

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

Agenda

Introductions, if appropriate.

Item	Page
1 Apologies for absence and clarification of alternate members	
2 Declarations of interests	
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 Deputations (if any)	
To hear any deputations received from members of the public in accordance with Standing Order 67.	
Members are asked to note that a deputation has been received from a local resident in relation to flytipping.	
4 Minutes of the previous meeting	1 - 24
To approve the minutes of the previous meeting held on 21 January 2026 as a correct record.	
5 Matters arising (if any)	
To consider any matters arising from the minutes of the previous meeting.	
6 Fly Tipping and Littering in Brent	25 - 50
This report reviews the effectiveness, performance and future development of the Council's arrangements for preventing, reporting, enforcing and cleaning up fly tipping and littering in Brent.	
7 Quarter 3 Financial Forecast 2025/26	51 - 146
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 3 2025/26. It also includes a separate in-depth overview of the Housing Revenue Account, providing further detail on the financial position and the key risks and challenges facing the fund.	

8 Complaints Analysis Report 2024/25 147 - 320

This report seeks to provide an overview of Brent's performance in handling and resolving complaints and presents the Complaints Annual Report for 2024-25.

9 Scrutiny Progress Update - Recommendations Tracker 321 - 338

The purpose of this report is to present the Scrutiny Recommendations Tracker to the Resources and Public Realm Scrutiny Committee for consideration.

10 Resources and Public Realm Scrutiny Committee Work Programme Report 339 - 346

To provide an update on the changes to the Resources and Public Realm Scrutiny Committee's work programme.

11 Any other urgent business

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

Date of the next meeting: Thursday 2 April 2026



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 RESOURCES AND PUBLIC REALM SCRUTINY COMMITTEE Held in the Conference Hall, Brent Civic Centre on 21 January 2026 at 6.00 pm

PRESENT: Councillor Conneely (Chair), Councillor Kennelly (Vice-Chair) and Councillors, S Butt, Dixon, Long, Lorber, Mitchell, and Molloy.

1. Apologies for Absence and Clarification of Alternate Members

Councillor Conneely (as Chair) welcomed members of the Scrutiny Committee to the meeting.

Apologies for absence were received from Councillors Shah and Lesley Smith.

Apologies were also recorded from Councillor Maurice during the meeting.

2. Declarations of Interests

There were no declarations of interest made during the meeting.

3. Deputations (If Any)

No deputations were received at the meeting.

4. Minutes of the Previous Meeting

It was **RESOLVED** that the minutes of the previous meetings held on Tuesday 4 November 2025 be approved as a correct record.

5. Matters Arising (If Any)

There were no matters arising raised at the meeting.

6. Resources & Public Realm Scrutiny Committee Work Programme 2025/26

The Chair began by reporting that Councillor Moeen (Cabinet Member for Community Safety and Cohesion) had been appointed Cabinet Member for Community Safety and Cohesion, taking over from Councillor Farah and replacing the previous Safer Communities, Jobs and Skills portfolio.

The Chair confirmed that Councillor Mitchell had stepped aside as Chair in favour of Councillor Molloy in relation to the Kerbside Management Scrutiny Task Group. It was also noted that the agenda item titled 'Kerbside Management Scrutiny Task Group Findings' had been rescheduled from the meeting on 21 January 2026 to the meeting on 2 April 2026.

The Chair additionally reported that the agenda item titled 'Community Engagement and Consultation' had been rescheduled from the meeting on 21 January 2026 to the meeting on 2 April 2026.

It was further highlighted that all changes were highlighted within the Work Programme report and corresponding Appendix.

Having reviewed the work programme report, it was **RESOLVED** to note the Resources & Public Realm Scrutiny Committee work programme for the 2025/26 Municipal Year.

7. Scrutiny Progress Update - Recommendations Tracker

The Chair advised the Committee of several key changes reflected within the Scrutiny Recommendations Tracker and confirmed that the Committee had now received long outstanding information previously requested in relation to I4B and First Wave Housing, as well as the information concerning the Green Skills Centre. The Chair further reported that the Committee had received the update on the Quarter 2 financial forecast, together with the information that the Committee had requested on a previous agenda item concerning the Voluntary Sector in Brent, Social Value and Procurement.

The Chair, however, highlighted that several requests remained outstanding from the Committee's meeting in February 2025 relating to Commissioning and Procurement, and Community Wealth Building and Social Value. The Chair further explained that a number of items continued to be outstanding from the Voluntary Sector in Brent, and Social Value and Procurement discussions held in November 2025. The Chair expressed concern that there had been significant delays in receiving responses to a number of these matters.

Having introduced the report, the Chair then moved on to invite questions and comments from the Committee in relation to the Scrutiny Recommendation's Tracker, with the following comments and issues discussed:

- As an initial query, the Chair questioned what the key barriers had been to the Committee receiving requested information in a timely manner and how the department and the Committee might work together more effectively in order to prevent further delays. In offering his apologies for the delays in the Committee's receipt of the information requested, Rhodri Rowlands (Director of Strategic Commissioning Capacity Building and Engagement) stated that the February 2025 recommendations would be addressed in detail at a later date. Regarding the recommendations from the November 2025 meeting, shared with the department in writing, he explained that had been a misunderstanding of the timeframes and stated that he was not entirely clear which recommendations and information requests remained outstanding at this time. It was highlighted that a number of key initiatives discussed extensively in November 2025, including the Procurement Strategy, the Social Value Policy and the implementation of both, were designed to address the recommendations and areas for improvement.
- Details were sought on which areas of concern were the most significant in relation to the outstanding recommendations identified. In response, Rhodri

Rowlands (Director of Strategic Commissioning Capacity Building and Engagement) clarified that the principal concerns related to the February 2025 recommendations. It was stated that the initial delays were attributable to himself and the service and stemmed from an underestimation of the scale of data cleansing and data analysis required to present the information in the format requested by the Committee. Rhodri Rowlands reflected that there were lessons to be learned regarding operational viability and communication at the outset of the information gathering and information sharing process associated with the Committee's recommendations. It was explained that, in some cases, the service's systems had not stored data in a format that was readily accessible. Reference was made to updates previously provided to the Committee in February 2025 and in November 2025, which had outlined the Procurement Improvement Programme and the proposals to transition to a new contract management system. It was additionally confirmed that additional capacity had been brought in to support data cleansing, and that these combined factors had caused earlier time estimates to fall short. It was also stated that a full response was anticipated within the next four weeks. It was further reported that spend analysis had been commissioned from the Centre for Local Economic Strategies as part of the Procurement Improvement Programme and the Community Wealth Building work. It was additionally stated that the findings would support the outstanding requirements and that relevant updates would be incorporated into the analysis. In concluding the response, Rhodri Rowlands reiterated that no single factor had caused the delays, but that operational viability at the outset had been the predominant issue.

- Clarification was sought on whether there would be an increase in resourcing within the service, or if the key matter was ensuring clearer communication and more realistic timescales when recommendations were set. In response, Rhodri Rowlands (Director of Strategic Commissioning Capacity Building and Engagement) noted that the previous viability issues had largely been addressed through significant improvements to the data position. It was confirmed that increasing capacity had been a core priority within the procurement improvement work and that additional staff had been brought into the service, including staff dedicated to data analysis and data management. Confidence was expressed that the service would not face the same difficulties in future.
- The Chair emphasised that the Strategic Commissioning Capacity Building and Engagement department was responsible for several highly significant decisions and policies which the Committee viewed as priorities for both the Council and its future direction. The Chair noted that discussions could also occur outside formal meetings regarding how both parties might work together more effectively, particularly during the work planning process after May 2025. In response, Rhodri Rowlands (Director of Strategic Commissioning Capacity Building and Engagement) confirmed his full support for this approach and acknowledged the wider strategic context. It was noted that several requests from the November 2025 meeting would be addressed through annual reports and updates on procurement and social value which would be presented to the Committee in due course.

Having reviewed the Scrutiny Recommendations Tracker, it was **RESOLVED** to note the progress of the previous recommendations, suggestions for improvement, and information requests of the Committee.

8. Anti-Social Behaviour (ASB) in Brent Report

Councillor Moeen (Cabinet Member for Community Safety and Cohesion) was invited to introduce the report relating to Anti-Social Behaviour (ASB) in Brent, which provided a detailed account of the scale, nature, and management of antisocial behaviour (ASB) in the borough, enabling the Committee to assess performance, understand key responsibilities and identify areas for improvement. In presenting the report, the strong progress that had been made in tackling antisocial behaviour across Brent and the significant challenges that the service continued to manage were highlighted. Members were advised that the report demonstrated the increased use of antisocial behaviour tools and powers in responding to perpetrators who often presented with complex needs. It was observed that this reflected the issues most frequently raised by residents, namely repeat antisocial behaviour offenders within neighbourhoods who were frequently vulnerable individuals experiencing housing insecurity, mental health difficulties, and drug and alcohol dependency. It was emphasised that the report detailed the clear and effective network of partnerships that the Council had utilised in order to address residents' safety concerns while ensuring that offenders received the support necessary to rebuild their lives. It was explained that the effective use of statutory powers enabled housing services, environmental health, community safety, safeguarding, youth services and the police to work collaboratively to address both the immediate impact of antisocial behaviour on residents and the underlying causes that contributed to such behaviour. It was further stated that strong multi-agency partnerships remained central to the Council's approach to reducing antisocial behaviour and protecting local communities. The report also highlighted the detrimental impact that antisocial behaviour had upon communities. It was noted that antisocial behaviour caused residents to feel unsafe and could lead to further criminality. It was further stated that antisocial behaviour created an environment of fear, which was particularly felt by women and girls. Attention was then drawn to the successful bid for Neighbourhood Community Infrastructure Levy (NCIL) funding that would enable the commissioning of patrol officers to support efforts to reduce antisocial behaviour occurring during night time hours. It was additionally stated that this would strengthen the Council's presence on the ground and enhance its ability to respond swiftly to matters as they arose. It was confirmed that the new patrol officers were expected to become operational by early next month.

In continuing the presentation, Nigel Chapman (Corporate Director Children Young People and Community Development) stated that antisocial behaviour remained a major issue for local residents and represented a significant concern that affected their daily lives. Hope was expressed that the Committee would recognise, through the report, that the increase in the number of fixed penalty notices and closure orders provided clear evidence of the impact of the ASB team's work. It was emphasised that, in relation to vulnerable residents who required both support and intervention, the report demonstrated how risk had been effectively managed and how the lives of residents had been improved as a result of the interventions undertaken.

Kibibi Octave (Director Community Development) further added that the report highlighted the importance placed by both the ASB team and the Council on understanding how antisocial behaviour affected residents and how addressing such behaviour contributed to increased public confidence in the Council's work to reduce crime and tackle antisocial behaviour. It was noted that the case studies included within the report provided an indication of the manner in which the ASB team addressed the issues presented to them, and that the work undertaken did not rely solely upon the front facing enforcement methods that were more commonly visible to the public. It was emphasised that the case studies illustrated the broader and more holistic approaches used by the service to support residents and reduce harm within communities.

Having thanked Councillor Moeen, Nigel Chapman and Kibibi Octave for introducing the report, the Chair then moved on to invite questions and comments from the Committee in relation to the Anti-Social Behaviour (ASB) in Brent Report, with the following comments and issues discussed:

- As an initial query, clarification was sought around whether there was a standalone Anti-social Behaviour Strategy or whether antisocial behaviour activity was primarily being delivered through the Safer Brent Community Safety Strategy. In response, Kibibi Octave (Director Community Development) clarified that antisocial behaviour was addressed within the overarching Safer Brent Strategy and was identified as one of the priorities under that strategy. It was explained that the guiding principle running throughout the strategy was early intervention and prevention, which included the Council's approach to antisocial behaviour. It was highlighted that one of the priorities within the strategy was the protection of those who were most vulnerable, whether they were victims or, in some instances, perpetrators of antisocial behaviour. It was confirmed that the Council did not have a standalone strategy for antisocial behaviour, unlike the approach taken for VAWG. It was added that this was a matter that could be considered further and potentially discussed with the Safer Brent Partnership, should they consider a standalone antisocial behaviour strategy to be required.
- The Chair sought details on how officers distinguished between increases in reporting that reflected greater public confidence in reporting incidents and increases that indicated a genuine rise in the prevalence of antisocial behaviour. The extent to which the increase in recorded incidents reflected improved reporting as opposed to increased incidence of antisocial behaviour was questioned. In response, Simon Egbor (Head of Community Safety and Prevention) noted that the evaluation undertaken by officers indicated an overall increase in the reporting of antisocial behaviour. It was stated that environmental antisocial behaviour represented the highest concentration of cases, as reflected in the committee report. It was explained that the Council had operated Public Spaces Protection Orders (PSPOs) for several years and that these orders were being expanded. This expansion had increased the range of prohibitions and had resulted in the need for greater enforcement activity, which in turn had led to an increase in the number of reports received. It was additionally highlighted that this increased reporting was considered positive, as it enabled the Council to better identify and respond to areas of

concern. It was added that there remained further work to be undertaken in assessing the impact of enforcement interventions, support measures and analytical processes, particularly in relation to reducing issues in identified hot spot areas. Members heard that the Safer Brent Strategy would conclude towards the end of the current year, and that issues concerning impact measures and the effectiveness of enforcement and support approaches would be set out in the annual report scheduled to be presented to the scrutiny committee in April 2026.

- As a further query, members drew attention to page 75 within the committee report concerning the number of reports made to the Council in 2024 and 2025. It was noted that reports relating to Environmental ASB (street based) had increased from 98 in 2024 to 212 in 2025. Clarification was sought on the reason for this significant increase. In response, Nigel Chapman (Corporate Director Children Young People and Community Development) opined that the increase reflected improved communication about the ways in which residents could report concerns. It was added that the Council's responsiveness in dealing with environmental antisocial behaviour, including clean-up work, had encouraged greater public engagement. It was noted that the increase from 98 to 212 was still relatively modest compared with the size of the Brent population and that overall numbers could be considerably higher. It was anticipated that numbers were likely to rise further given the focus on public engagement through the Council's campaign in this area. Noah Okunromade (Principal ASB Localities Officer) further added that improved reporting mechanisms, including the increased use of online platforms such as Fix My Street, had contributed significantly to the rise in reports relating to environmental antisocial behaviour.
- Members expressed disappointment that the report did not contain further analysis of the reasons for increases in specific categories of antisocial behaviour. It was noted that while a heat map provided a ward-based breakdown, there was no accompanying analysis explaining why particular increases had occurred. Details were sought on where this evidence could be found and, if not currently available, when it would be obtained, emphasising that understanding these trends was essential to reducing antisocial behaviour. In response, Nigel Chapman (Corporate Director Children Young People and Community Development) explained that in some areas, officers could identify clear reasons for increases. As an example, he cited the rise in fixed penalty notices, which could be attributed to focused enforcement activity by officers in locations such as Wembley Park. It was acknowledged that it was more difficult to determine the underlying cause of increases in other areas, and that it was not always clear whether rises reflected greater prevalence of antisocial behaviour or improved reporting by residents. It was noted that the ASB team intended to examine these issues further in advance of the annual report that would be presented to the committee in April 2026, in order to provide a more detailed understanding of trends and shifts. Kibibi Octave (Director Community Development) further explained that understanding the underlying factors required partnership working across the Safer Brent Partnership. It was highlighted that issues such as substance misuse, overcrowding, and concentrations of houses in multiple occupation were known to contribute to patterns of antisocial behaviour. It was stated that while heat maps and data

analysis could identify patterns, understanding the causes required information from partners as cases often evolved over time. It was emphasised that this analysis would be strengthened through further partnership engagement and incorporated into future Safer Brent Partnership data and reporting. Simon Egbor (Head of Community Safety and Prevention) additionally stated that drug related activity and labour disputes had remained consistent top categories of antisocial behaviour over several years. It was highlighted that environmental antisocial behaviour had become the highest category in the current reporting period, reflecting enforcement activity linked to Public Spaces Protection Orders. It was added that changes in working patterns following the Covid pandemic had resulted in more residents spending time at home, which had affected tolerance levels and influenced reporting patterns.

- Further information was sought by Members regarding what the success rate was in relation to the return of income from the issuing of fixed penalty notices, noting that this information had not been included within the committee report. In response, Noah Okunromade (Principal ASB Localities Officer) explained that Public Realm colleagues were responsible for issuing fixed penalty notices. Where a recipient had an identified vulnerability, they were referred to the appropriate support services. Where no vulnerability was identified, officers escalated matters to prosecution if fines remained unpaid. Simon Egbor (Head of Community Safety and Prevention) added that the service did not yet hold the percentage return rate. It was noted that there was generally a good level of compliance, and that in cases of systematic nonpayment individuals were considered for prosecution. It was additionally noted that proportionality was always taken into account when determining enforcement action and that referrals to support services were made where underlying issues were identified. Nigel Chapman (Corporate Director Children Young People and Community Development) further added that the latest data received indicated that the Council was recovering approximately 60% of fixed penalty notice income. He advised that further analysis would be undertaken as the collection and enforcement of fixed penalty notices sat within another directorate. It was confirmed that more detailed information would be obtained and shared with the committee following the meeting.
- The Chair then queried what types of cases were progressed to prosecution for consideration in court. In response, Councillor Krupa Sheth (Cabinet Member for Public Realm & Enforcement) explained that only higher-level offences were taken to court, as pursuing minor matters would not be a proportionate or efficient use of resources.
- In querying the apparent inconsistency in enforcement between the north and the south of the borough as shown in the fixed penalty notice data contained on pages 125 to 129 of the committee report, members sought clarification on the reasons for these discrepancies. In response, Simon Egbor (Head of Community Safety and Prevention) explained that there was a high level of enforcement activity in certain areas, particularly around Wembley Park, due to the significant events portfolio in that location. Members were advised that discussions were ongoing with Public Realm colleagues regarding how enforcement coverage could be more evenly distributed across the borough,

particularly with the anticipated introduction of additional Antisocial Behaviour officers. It was observed that data showed a higher prevalence of antisocial behaviour crime reports in the south of the borough, although such issues also occurred in the north. As an example, reference was made to persistent issues with street drinking around Ealing Road, which had resulted in increased enforcement. Members heard that the service was seeking to increase patrol flexibility and to encourage greater involvement from safer neighbourhood teams in enforcement activity. The need for a more equitable distribution of foot patrols across the borough was emphasised. It was also noted that a QR system was in place which enabled residents to report issues in real time. This intelligence informed the deployment of patrols and supported efforts to ensure fair coverage across the borough.

- The Chair further questioned what capacity existed within the team and within Council resources more broadly to deliver the level of enforcement currently seen in Wembley across the whole borough. In response, Nigel Chapman (Corporate Director Children Young People and Community Development) explained that additional officers funded through Neighbourhood Community Infrastructure Levy (NCIL) allocations were expected to commence the following month. The intention was to use the Neighbourhood Community Infrastructure Levy funding which arose from development in Wembley Park to expand enforcement presence across the borough. He advised that the aim was for officers to be visible in those areas that had historically experienced less enforcement activity. It was confirmed that this approach formed part of the broader strategy to ensure that resources were targeted in the areas where they were most needed.
- Clarification was sought on how long the work undertaken by the Neighbourhood Community Infrastructure Levy (NCIL) funded officers would continue. In response, Kibibi Octave (Director Community Development) explained that while the work would run for one year from February 2026, the programme would provide an evidence base to support future funding bids, including the possibility of submitting a growth bid. It was stated that the information gathered over the course of the year would help shape future proposals and determine the longer-term approach. Councillor Moeen (Cabinet Member for Community Safety and Cohesion) added that there was a recognised need for increased visibility and enforcement in the borough. It was noted that the programme would operate as a pilot and that its performance would inform decisions about how the Council might sustain the work in future. It was further stated that the Council would explore the use of its own resources or alternative income generating measures to ensure continuity where necessary.
- Members queried how many NCIL officers there would be. In response, confirmation was provided that the intention was to recruit 4 officers. Simon Egbor (Head of Community Safety and Prevention) added that Public Realm colleagues currently had approximately 18 patrol officers across the borough. It was noted that their shift patterns meant that they finished at approximately 8PM or 9PM. It was explained that the service intended to distribute enforcement activity more evenly, increase the generation of fines, and expand

borough wide coverage. It was additionally noted that there were numerous prohibitions and therefore significant opportunities to enhance enforcement activity, improve fine collection, and use data to inform decisions.

- In noting the absence within the committee report of information relating to the impact of improperly parked dockless bikes, including those left on pavements and within residents parking bays, members were keen to seek details on what actions were being taken where bikes were not parked in the designated bays around the borough. In response, Councillor Krupa Sheth (Cabinet Member for Public Realm & Enforcement) explained that consultations were underway regarding the Lime bike bays and that the Council intended to complete the installation of bays shortly. Members were advised that once the bays were in place riders would be unable to end their journeys outside a designated bay. It was confirmed that, should issues persist, the Council would consider further actions to hold the operator accountable. It was further stated that the Council was also exploring a model similar to that adopted by Hackney Council for their mobility bike provider. Members were additionally informed that a procurement exercise might be undertaken in the future to ensure a more stringent framework and to secure appropriate returns for the borough. It was confirmed that the priority was to complete the installation of the docking bays and then monitor their effectiveness.
- Members enquired about the timeline for the installation of the docking bays, noting that concerns regarding dockless bikes had persisted for several months. In response, Councillor Krupa Sheth (Cabinet Member for Public Realm & Enforcement) explained that only one officer was responsible for progressing this work and that the department faced resourcing constraints. It was noted that the pace of delivery was affected by objections arising during consultations, particularly where ward councillors or residents did not support proposed bay locations. This required the team to continually reassess locations and recommence consultation. It was confirmed that the programme was in its final stages and that an update would be provided once all bays had been installed. Although a definitive completion date was unable to be provided, Councillor Krupa Sheth expressed the expectation that the bays would be installed within the next couple of months and in any case before Spring 2026.
- Assurance was then sought on whether, aside from fixed penalty notices, the Council operated any other schemes, and how learning was captured, including lived experience, to inform different approaches to the wide range of antisocial behaviour issues, some of which could escalate into criminal behaviour. In response, Kibibi Octave (Director Community Development) explained that the Council operated a dedicated antisocial behaviour team alongside the core community safety team, which undertook significant commissioning work for interventions. It was stated that enforcement alone was not sufficient for long term solutions, and that support and diversion, for both young people and adults, were essential elements of the approach. It was noted that both teams reported to Simon Egbor (Head of Community Safety and Prevention). Reference was made to the Community Multi Agency Risk Assessment Conference (CMARAC), which consistently reviewed joint intervention options and support pathways where antisocial behaviour concerns had been

identified. It was emphasised that the Council did not adopt an exclusively enforcement led approach but maintained a continual support offer. Simon Egbor (Head of Community Safety and Prevention) further added that multi agency operations were not solely enforcement based. It was explained that teams typically included outreach providers such as Via for substance misuse support, St Mungo's for rough sleeping issues, the police, and other commissioned organisations depending on the needs of the area. It was stressed that the Council adopted a holistic model, recognising issues such as the lack of safe spaces for children after school, which could contribute to heightened perceptions of crime and antisocial behaviour. Members heard that part of the response involved supporting providers to deliver training and employment pathways and other interventions. It was noted that the Council commissioned a range of providers and was seeking greater flexibility in service mobilisation to respond rapidly to increases in antisocial behaviour or serious violence. It was confirmed that a tender exercise was underway, with specifications designed to ensure providers could deploy flexibly across the borough.

- Members further commented on the value of victim impact statements but noted that the committee report did not include information regarding victim satisfaction or how trust was being built with residents. In response, Simon Egbor (Head of Community Safety and Prevention) highlighted that internal discussions had been held with housing colleagues regarding satisfaction measures. Members noted that the Council was exploring how best to survey residents and understand the impact of interventions. It was further stated that annual surveys had previously been undertaken, and that the service intended to rebuild and embed stronger satisfaction monitoring. It was additionally noted that this work would be reflected in future reports to the Committee.

At this point in the proceedings, the Chair took the opportunity to introduce a representative of the Brent Youth Parliament (BYP) and invited them to put forward their questions, particularly in relation to matters affecting schools, with the following points noted:

- As an initial query, the Brent Youth Parliament representative questioned what assurance could be provided that Public Spaces Protection Orders (PSPOs) and closure orders were not disproportionately impacting individuals with protected characteristics such as age or complex needs. It was further queried whether the data presented by officers on antisocial behaviour enforcement specifically tracked age ranges or other protected characteristics in order to identify any potential discrimination. In response, Noah Okunromade (Principal ASB Localities Officer) explained that the Council had conducted an Equality Impact Assessment to ensure that protected characteristics were considered when Public Spaces Protection Orders were issued. It was stated that where a fixed penalty notice was issued to an individual who appeared to be vulnerable, the matter was escalated to him so that checks could be undertaken to ensure that vulnerable individuals were not inappropriately fined. Simon Egbor (Head of Community Safety and Prevention) further added that the Equality Impact Assessment (EIA) was reviewed annually to ensure that enforcement activity remained equitable and proportionate. It was acknowledged that officers faced

challenges in gathering demographic information during enforcement interactions, as in some cases individuals declined to provide such details. It was confirmed that efforts were underway to improve data collection and that where harder to reach groups were affected, bespoke interventions would be developed. It was emphasised that the Equality Impact Assessment examined all protected characteristics and considered both positive and negative impacts, and that the assessment was reviewed in light of enforcement data.

- Further information was then sought by the Brent Youth Parliament representative around whether demographic data collected for equality monitoring purposes would be publicly available. The Chair additionally queried what data informed the Equality Impact Assessment if officers were not consistently recording age, ethnicity, or other demographic characteristics. In response, Simon Egbor (Head of Community Safety and Prevention) informed that officers were advised to capture demographic information although individuals were not legally required to provide all the details requested. It was confirmed that individuals were required by law to provide their name and address, and that non-compliance constituted an offence which could be enforced by the police. Members were further advised that officers were being encouraged to collect as much demographic information as possible in order to ensure that enforcement activity did not result in the over representation or under representation of specific groups. Noah Okunromade (Principal ASB Localities Officer) added that the Equality Assessment was publicly available and that the relevant demographic data regarding enforcement would be shared with the Committee.
- The Chair sought details on which age group represented the largest proportion of recipients of fixed penalty notices and which age group was most frequently sanctioned under Public Spaces Protection Orders. In response, Simon Egbor (Head of Community Safety and Prevention) advised that this information would need to be examined in greater detail and would be brought back to the Committee as part of the annual report. Nigel Chapman (Corporate Director Children Young People and Community Development) further added that a greater depth of data collection and analysis was required to inform future work. The need to gather as much contextual and background information as possible was emphasised, noting that disclosure from individuals could at times be limited.
- In noting that reference to the removal of safer schools officers was not included within the section of the committee report titled 'Future Challenges and Opportunities', the Brent Youth Parliament representative questioned what impact the removal of safer schools officers had on antisocial behaviour enforcement involving young people and how this was being monitored. In response, Nigel Chapman (Corporate Director Children Young People and Community Development) reported that the withdrawal of safer schools' officers was a decision made by the Metropolitan Police. It was noted that while not all schools had previously had a dedicated officer, several secondary schools within the borough did. The Metropolitan Police had decided to redeploy officers from schools into neighbourhood policing teams. It was acknowledged that councils, including Brent, had expressed concerns about this change but

confirmed that the decision rested with the Metropolitan Police. Nigel Chapman advised that police representatives would be attending the Resources and Public Realm Committee meeting in April 2026 to present the Safer Brent Report, where this matter could be raised directly.

- As an additional issue highlighted, the Brent Youth Parliament representatives queried the reference to youth programmes on page 106 of the committee report and noted that no specific information was provided on the referral pathways for young people or on the level of council funding allocated to these programmes. In response, Nigel Chapman (Corporate Director Children Young People and Community Development) conveyed that the Youth Justice Service operated a range of interventions and programmes for young people assessed as being at higher risk of offending. It was reported that a new programme was due to commence in April 2026 in partnership with Camden and Westminster, jointly funded by the John Lyons Trust and the three councils. This would provide cross border activities for children and young people and would utilise facilities including the Oxford Kilburn Youth Trust in Kilburn (OK Club). It was further stated that the Council had invested approximately £4 million of Neighbourhood Community Infrastructure Levy (NCIL) funding into five youth providers to improve youth facilities over the next two years. It was clarified that this funding was directed to improving buildings and facilities rather than individual programmes, although this investment would allow providers to redirect their own resources towards activities and support for young people.
- As a final issue raised, the Brent Youth Parliament representatives sought details on whether the Council tracked how allocated funds were ultimately used. In response, Nigel Chapman (Corporate Director Children Young People and Community Development) confirmed that a project team oversaw the allocation of funding and that clear monitoring arrangements were in place. It was noted that the Youth Strategy, which had been developed with input from young people, included an action plan relating to facilities and spaces, and that progress was monitored. It was additionally noted that the Community and Wellbeing Scrutiny Committee also held the service to account for delivery of the Youth Strategy. Councillor Moeen (Cabinet Member for Community Safety and Cohesion) additionally noted that representatives of the Metropolitan Police would be present at the Metropolitan Police engagement event on 26 January 2026 at Brent Civic Centre and that this would present an opportunity for Brent Youth Parliament members to raise concerns about the removal of safer schools officers directly with police representatives. The Brent Youth Parliament representative confirmed that they normally attended the Brent Safer Neighbourhood Board meetings and would therefore be present at the upcoming engagement event.
- Returning to the issue of multi-agency partnership work, members queried the extent to which local councillors were able to feed local intelligence into multi agency partnership work undertaken through the Community Multi Agency Risk Assessment Conference (CMARAC) and the Brent Joint Action Group (BJAG), as highlighted in the committee report. In response, Noah Okunromade (Principal ASB Localities Officer) confirmed that councillors were able to feed intelligence into the Brent Joint Action Group. Members were advised that such

contributions were valuable in identifying hotspots, as issues raised through this route could be discussed at Brent Joint Action Group meetings, which included police and partner agencies. It was also noted that antisocial behaviour officers were available for the reporting of cases and that Members Enquiries provided alternative means through which issues could be raised. It was explained that some matters were subsequently considered through the multi-agency panel. Kibibi Octave (Director Community Development) added that Member Enquiries remained one of the key channels for intelligence. Members were further advised that residents also made use of the noise reporting app and the online antisocial behaviour reporting tool, and that repeated reports concerning a particular street or block were prioritised for consideration by the Brent Joint Action Group. It was additionally stated that, during a recent handover meeting with Councillor Moeen (Cabinet Member for Community Safety and Cohesion), discussions had taken place regarding how best to enhance engagement with ward councillors. It was explained that the Safer Brent Partnership had moved to an area-based model six months previously, aligned with the Brent Connects areas, enabling more detailed analysis at a neighbourhood level. It was indicated that consideration was being given to inviting ward councillors to receive updates relating to their respective ward areas or enabling Councillor Moeen, as Lead Member for Community Safety and Cohesion, to feedback key points and invite councillors to submit issues for discussion. It was emphasised that the intention was to build more consistent channels through which councillors could contribute intelligence.

- Questions were raised around how the Council dealt with issues that spanned multiple Brent Connects areas, noting that some matters involved several wards and more than one Brent Connects area. In response, Nigel Chapman (Corporate Director Children Young People and Community Development) explained that the Council sought to avoid artificial boundaries and confirmed that where an incident crossed ward or area lines, the relevant ward councillors would be notified. Members were advised that the Brent Connects structure was used primarily to analyse broader themes within an area rather than individual cases, which were addressed directly with the relevant ward councillors on an as required basis. Members further suggested that, given the importance of community intelligence, it would be valuable to engage not only ward councillors but also ward panel chairs, who had extensive community networks. It was further questioned whether opportunities could be explored to include ward panel chairs, should the terms of reference be reviewed. In considering the response, Kibibi Octave (Director Community Development) advised that Gill Close, Chair of the Safer Neighbourhood Board, held strong relationships with ward panel chairs, and that consideration could be given to briefing them in the same manner as councillors and enabling them to contribute intelligence relating to Brent Connects areas.
- Members queried the cross connection between community safety and housing services and sought further detail on how the two areas worked together. In response, Simon Egbor (Head of Community Safety and Prevention) explained that the team held a service level agreement to manage medium and high-risk cases for Brent Housing Services and that a service level agreement with Private Housing Services (PHS) had recently been established. Members

noted that both housing services acted as primary investigators where antisocial behaviour originated from those premises. It was confirmed that where a hotspot met the required threshold, it would be referred to the Brent Joint Action Group for coordinated action, with representatives from Private Housing Services and Brent Housing Services participating as appropriate. It was noted that Noah Okunromade (Principal ASB Localities Officer) accompanied private housing officers on joint visits to review licensing conditions, assess compliance and address any issues with landlords, which ensured a more integrated approach. It was emphasised that the team had invested in dedicated officer capacity for this work, as a service level agreement with Private Housing Services had not existed previously. Noah Okunromade (Principal ASB Localities Officer) further stated that representatives from Private Housing Services attended the Brent Joint Action Group and were therefore able to support the development of joint actions to resolve issues.

- The Chair sought details on when the service level agreement with the private rented sector team began, to which Noah Okunromade (Principal ASB Localities Officer) confirmed that it had commenced in 2025. Simon Egbor (Head of Community Safety and Prevention) additionally noted that the service level agreement with Brent Housing Services had been in place since 2018 and that the arrangement with Private Housing Services had been in place for just over one year. The Chair raised related questions around whether the service level agreement with the private rented sector team had been effective. In considering the response, Noah Okunromade (Principal ASB Localities Officer) stated that the arrangement had been successful, as it allowed for joint working and joint visits which had not been possible previously. It was explained that antisocial behaviour officers and enforcement officers were now able to undertake joint inspections, identify compliance issues and engage directly with landlords to resolve problems. Kibibi Octave (Director Community Development) further added that challenges often arose from the behaviour of other tenants within properties. It was stated that the support provided by housing colleagues had been positive, but a key issue under discussion was how the Council could strengthen its engagement with managing agents, particularly where landlords passed responsibility for property management to agents. The importance of ensuring that managing agents did not place tenants who were likely to cause antisocial behaviour was emphasised. Simon Egbor (Head of Community Safety and Prevention) additionally noted that the Antisocial Behaviour Crime and Policing Act 2014 provided tools and powers that could be used to enforce obligations on landlords. Members were advised that housing providers had been issued with notices where they had failed to take reasonable steps to address issues, for example, failing to secure bin chutes. It was confirmed that officers were being encouraged to consider applying these powers where necessary.
- Details were sought on whether the Houses in Multiple Occupation (HMO) licensing teams routinely consulted the antisocial behaviour teams before issuing a licence, specifically to determine whether an applicant was a suitable licensee and whether a property or landlord had any history of antisocial behaviour. Members further asked whether licensing officers engaged with other relevant council departments to ensure that properties or landlords linked

to antisocial behaviour were appropriately identified. In response, Simon Egbor (Head of Community Safety and Prevention) highlighted that this was an area that could be strengthened. Members were advised that there was an opportunity to review the service level agreement, including the volume of cases, the level of engagement, and the processes in place concerning the selection of landlords operating within the borough. However, it was confirmed that consultation of this nature was not currently undertaken. Councillor Muhammed Butt (Leader of the Council & Cabinet Member for Safer Communities, Jobs & Skills) added that housing associations operated their own antisocial behaviour teams and that the Council worked collaboratively with them to ensure a holistic response to issues. Reference was made to work with L&Q in the Tokyngton ward, where significant efforts were being made to gather evidence and data of sufficient quality to meet the threshold required for court action. The challenges that arose when working with organisations that did not utilise their own teams fully was acknowledged. It was also explained that Councillor Fleur Donnelly-Jackson (Cabinet Member for Housing) held monthly meetings with major housing associations in Brent to raise concerns regarding antisocial behaviour, and that senior level engagement with providers such as Quintain took place regularly, enabling issues to be escalated swiftly.

- The Chair posed the question of whether housing associations were sufficiently utilising their antisocial behaviour resources and whether the Council was absorbing costs that fell within the responsibility of those associations. In response, Councillor Muhammed Butt (Leader of the Council & Cabinet Member for Safer Communities, Jobs & Skills) opined that he did not consider the Council to be bearing an inappropriate cost, as the residents affected were Brent residents irrespective of the type of accommodation in which they lived. It was emphasised that it was incumbent upon the Council to work with partners regardless of cost considerations. It was further advised that Quintain and local housing associations also contributed resources to address antisocial behaviour, and that partnership working was not one sided.
- Clarification was sought by members on what other tools were available to address antisocial behaviour aside from closure orders. In response, Noah Okunromade (Principal ASB Localities Officer) explained that the tools used depended on the nature and severity of the antisocial behaviour. It was advised that closure orders were only one option and that the Council also utilised injunctions and a range of other tools and powers. Simon Egbor (Head of Community Safety and Prevention) further added that the evidence gathering process could influence the timescale for action, particularly where the removal of an individual from their home for a period of up to three months, for example, was being considered. It was noted that witness statements and accumulated evidence of antisocial behaviour or crime were often required. The use of community protection warnings and community protection notices were highlighted, which could be issued quickly and flexibly. It was also explained that intelligence gathering could be challenging in some estates, particularly where camera infrastructure was limited. Work was underway with housing colleagues to explore opportunities for integrating estate-based cameras into the Council's control room to enhance monitoring. It was further emphasised that antisocial behaviour tools operated on a civil standard and that officers

were encouraged to intervene as early as possible. The importance of proportionality was stressed, particularly with younger individuals, to avoid unnecessary criminalisation that could hinder future opportunities. Reference was also made to work on target hardening and the need to prioritise resources based on prevalence and data. It was additionally noted that closure notices could be cancelled prior to court proceedings where appropriate and that the legislation provided flexibility to act swiftly. The vital role of the police in identifying individuals and the importance of aligning council resources, patrol teams and police body worn camera evidence to support early intervention was also highlighted.

- The Chair queried whether confidentiality requirements hindered the Council's ability to reassure residents that appropriate action and support were being provided, and whether improvements could be made in how the Council communicated outcomes while still protecting vulnerable individuals. In response, Kibibi Octave (Director Community Development) informed that ward panels provided a suitable forum for sharing high level information without breaching confidentiality. It was explained that while the Council could not share personal details regarding individual cases, it was possible to inform residents that a multi-agency response had been undertaken, involving partners such as health services, which often provided reassurance. It was noted that some residents welcomed this approach while others were less concerned with the process and more focused on resolving the problem. It was highlighted that this type of communication demonstrated a partnership approach. It was also explained that the Safer Neighbourhood Board held the police to account and provided oversight of partnership activity, and that while the Council was not responsible for the Board's operations, it worked closely with it. It was suggested that the Safer Brent Partnership Annual Report could include a paragraph summarising the work of ward panels and their role in addressing crime in Brent. In continuing the response, Nigel Chapman (Corporate Director Children Young People and Community Development) added that the Mayor's Office for Policing and Crime (MOPAC) funded the work of neighbourhood panels and required the submission of monitoring returns. It was suggested that the Safer Brent Partnership report could include a summary of this information to demonstrate the effectiveness of the panels and areas for further focus.
- Details were sought by members on what safeguards had been in place to ensure that no inaccurate or malicious reporting occurred and to minimise any legal risk to the Council arising from any failure to follow established procedures correctly. In response, Noah Okunromade (Principal ASB Localities Officer) advised that all tools and powers utilised by Anti-Social Behaviour officers had been discussed with him for clarity. It was stated that, where any uncertainty arose regarding the proportionality of escalating the use of such tools and powers, legal services would be consulted to provide appropriate guidance. It was confirmed that this procedure acted as a safeguard to ensure that the Council took the correct steps and did not place itself at risk. Simon Egor (Head of Community Safety and Prevention) further confirmed that any closure order case had required ratification by the legal team before being submitted to the court. It was reported that quality checks had also been undertaken when considering safeguards for young people. It was added that, in relation to

investigation processes and the victim and offender profile, substantive evidence was required prior to taking any enforcement action. In considering the response received by officers, a Member referred to a recent live example in which a Community Protection Notice had been issued and subsequently withdrawn following a meeting with the legal team. The Member questioned what checks had been undertaken prior to issuing such a notice. In response, Simon Egbor (Head of Community Safety and Prevention) noted that he had been aware of the case and explained that in fact, a Community Protection Warning had been issued as opposed to a Community Protection Notice. It was clarified that the Community Protection Warning in question had been issued by the Nuisance Control Team rather than by the Anti-Social Behaviour Team. It was emphasised that one of the safeguards in place had been the assessment of proportionality prior to any escalation. It was clarified that a Community Protection Warning was not a legal notice and constituted only an initial warning intended to advise an individual of required behavioural changes before any formal notice might be issued. It was confirmed that this represented a first step intervention. Kibibi Octave (Director Community Development), in continuing the response, added that Fixed Penalty Notices, Community Protection Notices and other enforcement mechanisms were issued by multiple departments, including parks and neighbourhood patrol officers. It was suggested that the Public Space Protection Order working group could consider this matter further, as consistent cross departmental understanding was required. It was stated that the point would be taken forward to ensure that officers across the Council exercised full consideration before issuing any warnings or notices. In referring to a recent Cabinet report relating to the corporate peer challenge, Councillor Muhammed Butt (Leader of the Council & Cabinet Member for Safer Communities, Jobs & Skills) additionally noted that the report had highlighted organisational silos. Assurance was provided that he and the Council Management Team (CMT) had been reviewing how these silos could be reduced and how teams could be encouraged to work more effectively across departments.

- Members sought clarification regarding which operational pressures were most critical to be addressed in order to improve the service as quickly as possible. In response, Nigel Chapman (Corporate Director Children Young People and Community Development) reported that partnership working had presented ongoing challenges, although strong operational arrangements with the police had been maintained. It was noted that issues had arisen due to neighbourhood and borough boundaries, particularly at the Westminster and Camden borders, and within the Kilburn area. It was confirmed that officers, including Simon Egbor (Head of Community Safety and Prevention) had been working to manage the complexities created by three borough command units operating within one locality. It was further reported that resources remained a challenge, noting that the size of the team had been lean and had consequently limited the ability to undertake detailed analysis of work and its impact. It was further identified that income generation through Fixed Penalty Notices and the sustainability of the new enforcement team would form a key future consideration. Simon Egbor (Head of Community Safety and Prevention) further added that the historical staffing model had provided Anti-Social Behaviour officer presence only from Monday to Friday, with officers finishing

work after 18:00PM. It was outlined that peaks in antisocial behaviour had typically occurred during late evenings and weekends. It was reported that the service had been addressing this challenge by expanding operational coverage to 01:00AM, which had improved visibility and capacity to manage incidents. Members were further advised that, although closure orders could be put in place, they were ineffective if they could not be adequately monitored, particularly where unauthorised re-entry into blocks occurred. The importance of continued engagement with police regarding resource prioritisation was stressed, recognising that serious and violent crime would take precedence. It was confirmed that officers were lobbying the police to ensure that antisocial behaviour commitments were met on the ground. It was further emphasised that the Council also needed to strengthen its own visibility and presence, including joint working with VIA and other outreach providers.

- Members questioned why, despite rising Anti-Social Behaviour reports and increased case complexity, no Anti-Social Behaviour case reviews had met the statutory threshold. It was queried whether this reflected effective early intervention or whether barriers to escalation remained. In response, Noah Okunromade (Principal ASB Localities Officer) stated that early intervention had been the primary factor. It was explained that when cases had been presented for review, officers had first sought information from Registered Providers or internal Council services to establish what action had already been taken. In most cases, evidence had shown that steps were in progress. It was noted that the gathering of evidence for enforcement action could take time and that, when officers had been satisfied that activity was underway, an appropriate response had been provided. It was added that Noah Okunromade routinely assigned a named officer in his responses to ensure that residents with ongoing concerns had a direct point of contact. It was confirmed that residents had generally been satisfied with the responses provided. Kibibi Octave (Director Community Development) additionally noted that the pattern of cases indicated evidence of prevention. It was noted that the challenge lay in maintaining consistent monitoring of early intervention outcomes. It was stated that the public health early intervention model was well embedded, but the service needed to improve how it collated and celebrated the success of cases that had not escalated. Simon Egbor (Head of Community Safety and Prevention) further explained that Anti-Social Behaviour case reviews were governed by a prescribed statutory criteria determining which cases could progress. The importance of resident satisfaction monitoring was emphasised and confirmed that the team intended to undertake regular surveys to analyse service impact. It was stressed that the team had taken prompt action in accordance with customer service expectations, resulting in early intervention being applied in many cases. It was noted that the review process was publicly accessible through the Council's website. It was additionally reported that more work was required to gauge resident perceptions of performance and to use evaluation feedback to refine service delivery.
- Details were sought on whether any benchmarking had been undertaken with other boroughs. In response, Noah Okunromade (Principal ASB Localities Officer) confirmed that he attended the Anti-Social Behaviour Forum, through which case levels and practice with colleagues from other authorities were

benchmarked. Simon Egbor (Head of Community Safety and Prevention) added that the annual report could include comparative data on case reviews for further transparency.

- Members questioned how serious a problem Houses in Multiple Occupation had been for the borough. In response, Noah Okunromade (Principal ASB Localities Officer) reported that Houses in Multiple Occupation had been one of the principal reasons for establishing a new service level agreement. It was explained that, during the previous year, Houses in Multiple Occupation had been identified as a significant issue. Following this, officers had worked with Private Housing Services and had undertaken joint operations to visit properties and address antisocial behaviour concerns. In considering the response, a Member expressed concern that, despite licensing requirements, many Houses in Multiple Occupation in Brent remained unlicensed or unidentified. The Member highlighted that Houses in Multiple Occupation generated a range of issues beyond antisocial behaviour and questioned why the Council did not temporarily halt all further approvals of Houses in Multiple Occupation until outstanding problems had been fully addressed. The Member argued that the continued conversion of larger properties into Houses in Multiple Occupation reduced the availability of suitable accommodation for homeless households and urged the Council to adopt a temporary suspension of the approval of Houses in Multiple Occupation until all existing Houses in Multiple Occupation had been identified and appropriately managed. The Chair responded, clarifying that the Houses in Multiple Occupations known to the Council were those that had applied for licences or those that had been subject to review.
- The Chair noted previous evidence suggesting a high number of unlicensed Houses in Multiple Occupation within the borough and queried why additional resources had not been directed to identifying these properties and further asked why antisocial behaviour data identifying Houses in Multiple Occupation hotspots had not been routinely shared with licensing colleagues. In response, Kibibi Octave (Director Community Development) confirmed that information was shared routinely. It was explained that when a report of a House in Multiple Occupation was received, officers first checked whether a licence existed and initiated enforcement action where necessary. Members were informed that Housing Services were represented on the Safer Brent Partnership and analysed the prevalence of Houses in Multiple Occupation. It was further noted that areas with Edwardian and Victorian properties were more likely to contain Houses in Multiple Occupation. It was also confirmed that Willesden and Kilburn had shown the highest levels of demand. It was acknowledged that unlicensed properties were harder to identify unless reported by the community.
- A Member suggested that, given the housing crisis and the shortage of large accommodation for homeless households, the Council should suspend the approval of new Houses in Multiple Occupation for a period of 12 months until the situation had been stabilised. In response, Councillor Muhammed Butt (Leader of the Council & Cabinet Member for Safer Communities, Jobs & Skills) explained that a property could only be converted into a House in Multiple Occupation following an application for planning permission. Members were advised that a suspension on approvals would be a retrograde step and could

deter compliant landlords who had invested in meeting required standards. It was emphasised that the Council acted robustly against illegal conversions and confirmed that several properties had been returned to single dwelling use following enforcement action. It was added that the Council had successfully prosecuted landlords who had illegally converted properties and that significant fines had been issued. Members were referred to examples published on the Council's website. It was further stated that the Renters Rights Act 2025 had provided new powers that would support continued enforcement activity.

In seeking to bring consideration of the item to a close, the Chair thanked officers and members for their contributions towards scrutiny of the Anti-Social Behaviour (ASB) in Brent Report. As a result of the outcome of the discussion, the following information requests and suggestions for improvement identified were AGREED:

RECOMMENDATIONS TO CABINET:

- (1) Develop a stand-alone Anti-Social Behaviour (ASB) strategy structured around a clear three-pillar approach encompassing early interventions, formal enforcement and criminal justice interventions, and financial, housing, and social care-related interventions.
- (2) Strengthen planning policies relating to the location, concentration, design and management of Houses in Multiple Occupation (HMOs), enabling planning decisions to better consider and mitigate the risk of anti-social behaviour.

SUGGESTIONS FOR INFORMATION:

- (1) Strengthen liaison and information-sharing between anti-social behaviour, housing and neighbourhoods, and licensing enforcement teams, ensuring that relevant intelligence on landlord management history is consistently considered when applying licensing criteria, and that any concerns are appropriately flagged for continued oversight where licences are granted.

Prior to considering the suggestion for improvement detailed above (as subsequently amended following consultation with the Chair) Councillor Lorber suggested the following as an alternative action - that the Committee consider a proposal to halt the approval of new Houses in Multiple Occupation for a period of 12 months until the housing crisis and the shortage of large accommodation for homeless households had been stabilised. Upon being put to the vote, the proposal was declared lost and therefore not agreed and the Committee RESOLVED to approve the suggestion for information as set out above.

- (2) Review the current prioritisation and resourcing of licensing enforcement to ensure it is sufficient to address the scale and impact of anti-social behaviour associated with poor property management.
- (3) Improve the consistency and equity of anti-social behaviour enforcement across the borough, ensuring that Public Spaces Protection Order (PSPO) and related enforcement powers are applied fairly and proportionately, and that residents receive a comparable standard of service regardless of location.

- (4) Subject to evaluation of impact and value for money, explore and pursue all appropriate funding options, including Neighbourhood Community Infrastructure Levy (NCIL)(where available, to sustain out-of-hours ASB enforcement activity beyond the initial 12-month NCIL-funded pilot period.
- (5) Actively encourage strategic multi-agency ASB partnerships (e.g. Community Multi-Agency Risk Assessment Conference (CMARAC), Borough Joint Action Group (BJAG)) to strengthen engagement with local representatives, including councillors and ward panel chairs, to improve the flow of local intelligence and insight into emerging ASB issues and community impacts.
- (6) Ensure future reports to the Committee clearly set out the strategic context for the topic under consideration and are supported by sufficient background information, narrative explanation of figures and trends (including benchmarking where relevant), and insight into resident experience and satisfaction. As an initial step, include in the upcoming annual report the following information, where possible:
 - Assessment of the effectiveness of current anti-social behaviour interventions, drawing on available data and evidence to support understanding of what is working and where improvement may be needed.
 - Clear explanation of police and council community safety remits, including Safer Neighbourhood Team and ward panel activity as police functions, and how these link to and inform the work of the Safer Brent Partnership Board.
 - Analysis of Fixed Penalty Notices related to ASB, including offence type, enforcement outcomes, repeat enforcement, geographic distribution, time-based patterns, relevant demographic characteristics, and evidence of impact on anti-social behaviour.
 - Analysis of Fixed Penalty Notice income recovery, including payment rates, cases escalated to court, prosecution outcomes, and recovery rates for unpaid notices, with contextual information distinguishing, where available, between non-payment due to inability to pay and deliberate non-compliance.
 - Analysis of PSPOs, including geographic patterns of use, enforcement outcomes, repeat breaches, evidence of impact, relevant demographic trends, and community feedback.
 - Benchmarking of ASB case review outcomes against comparable authorities or relevant external benchmarks, where available.

INFORMATION REQUESTS

- (1) Provide an update on the 'Dockless Cycle Hire Bay' consultation undertaken in Summer 2025 as part of the work to identify suitable locations for Lime bike parking bays across the borough, including engagement with residents and ward councillors and any emerging outcomes.

Please note that the specific wording of the Cabinet recommendations, suggestions for improvement and information requests were subject to refinement following the meeting, with the agreement of the Chair.

9. Budget Scrutiny Task Group Findings Report

The Chair opened the discussion by expressing gratitude to all Members who had contributed to the work of the Budget Scrutiny Task Group. In introducing the report, the Chair stated that, although some progress had been made as a result of the three-year settlement and certain improvements to core funding, these developments represented only an initial step. The Chair emphasised that such measures remained insufficient to compensate for the significant reductions in service funding experienced over many years and decades. The Council therefore continued to operate in an extremely difficult financial environment. The Chair noted that the budget had been presented in a revised format, which placed an increased responsibility upon the Committee to reconsider its approach to budget scrutiny in order to maintain best practice. The revised approach, in the Chair's view, provided an opportunity to address organisational silos and to support more strategic cross departmental working than had previously been undertaken. The Chair commended the work of the Children and Young People service, which had achieved a significant reduction in the use of agency staff, lowering related expenditure by half within a two-year period, and had developed new proposals to counter the effects of privatisation within contracts. The Chair expressed the hope that similar approaches would be adopted more widely across the organisation. Early indications of comparable developments in Adult Social Care had been referenced, and further analysis was expected as part of the Quarter 3 Finance Report in February 2026. The Chair stressed that it was essential for the Committee to maintain a very close focus on the impact of financial decisions upon residents. The quarterly finance reports scheduled before May 2026, and thereafter, would be integral to this monitoring process.

Having introduced the report, the Chair then moved on to invite questions and comments from the Committee in relation to the Budget Scrutiny Task Group Findings Report, with the following comments and issues discussed:

- As an initial point, members stated that the report had been both fair and reasonable and commented that the conclusions had been particularly well summarised.
- A Member expressed the view that the Committee had not achieved meaningful scrutiny outcomes, stating that the Committee had not been provided with the appropriate information required to contribute effectively. The Member noted that, in response to the current year's overspend, Cabinet had approved a recommendation to halt non-essential expenditure. The Member stated that the

Committee had not been given any opportunity to scrutinise what constituted non-essential expenditure, nor whether such expenditure reductions represented genuine savings or simply deferrals into the next financial year. The Member further stated that the Committee had not been able to scrutinise the overall change in spending arrangements or the use of strategic Community Infrastructure Levy (SCIL) funding. Additionally, the Member noted that the spending power of the Council had been presented as increasing by 9.9%. The Member questioned the accuracy of this figure, observing that it included an assumption that the Council would adopt the Government's recommended 5% increase in Council Tax. The Member noted that officers had initially advised that 1/3 of the 9.9% increase had been attributable to the Council Tax rise, whereas the current report indicated that 40% of the increase derived from the Council Tax uplift. The Member further stated that the report had not clarified that the Council's overspend for Quarter 2 had been estimated at £9 million, driven primarily by temporary accommodation pressures and costs relating to Adult Social Care. The Member noted that by Quarter 3 the overspend had increased to £12.5 million, representing an increase of £3.5 million. The Member sought clarification from officers as to whether this represented a recurring overspend arising from ongoing financial pressures such as increased employee costs, including the rise in National Insurance contributions imposed nationally. The Member argued that, if such pressures were recurrent, the 9.9% spending power improvement had already been diminished substantially.

In response, the Chair provided clarification that all the matters raised by the Member, except for the final point concerning the change between Quarter 2 and Quarter 3, had been discussed during the Budget Scrutiny Task Group meetings. The Chair explained that timing challenges existed between the scheduling of budget scrutiny and the availability of the Quarter 2 and Quarter 3 financial reports, meaning the Committee could only scrutinise the information available at the time of presentation. The Chair reiterated that the Committee had acknowledged that the Council remained in a highly vulnerable financial position. The Quarter 3 Report, due to be received in February 2026, would provide the Committee with the opportunity to scrutinise the increase in overspend between the two quarters, an increase which the Chair confirmed had been influenced in part by the rise in National Insurance contributions. The Chair stated that the Committee would return to these issues at the February 2026 meeting, where Members would be able to revisit the questions raised.

- Another Member stated that the financial settlement did not address the systemic financial challenges faced by Brent and by other local authorities nationally. The Local Government Association (LGA) had described the settlement as a 'sticking plaster' which did not provide a sustainable solution. The Member requested that this concern be noted formally on the record, emphasising the precarious financial context and the need for improved national policy that recognised the substantial pressures faced by local government.
- As a further issue highlighted, a Member further stated that the Committee had not been provided with sufficient detail about Council expenditure to enable it to identify potential areas for savings or to contribute meaningfully to

discussions regarding how material overspends might be mitigated. In response, the Chair reported that the Quarter 3 Report, to be presented in February 2026, would include early indications of departmental spending, along with identification of the service areas responsible for the overspend. The Chair confirmed that the relevant departments had already been requested to attend the upcoming meeting so that Members could question them directly regarding their expenditure, the causes of overspend, and the actions being taken to manage financial pressures. The Chair stated that they had already anticipated the risk areas and had taken steps to ensure appropriate officer attendance at the February 2026 meeting.

In seeking to bring consideration of the item to a close, the Chair thanked officers and members for their contributions towards the discussion of the Budget Scrutiny Task Group Findings Report. As a result of the outcome of the discussion, it was RESOLVED:

- (1) That the Budget Scrutiny Task Group Findings report be agreed and submitted to Cabinet and Full Council as part of the budget setting process.

10. Any other urgent business

No items of urgent business were identified.

The meeting closed at 8:36 PM

COUNCILLOR RITA CONNEELY
Chair

 Brent	Resources and Public Realm Scrutiny Committee 24 February 2026
	Report from the Corporate Director of Neighbourhood and Regeneration
	Lead Cabinet Member for Public Realm and Enforcement - Cllr Krupa Sheth
Fly Tipping and Littering in Brent	

Wards Affected:	All
Key or Non-Key Decision:	Not applicable
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
List of Appendices:	N/A
Background Papers:	N/A
Contact Officer(s): (Name, Title, Contact Details)	Chris Whyte Director of Public Realm Chris.Whyte@brent.gov.uk Tel: 020 8937 5342

1.0 Executive Summary

- 1.1. The purpose of this report is to review the effectiveness, performance and future development of the Council's arrangements for preventing, reporting, enforcing and cleaning up fly tipping and littering in Brent.
- 1.2. This report provides detailed information on fly tipping and littering performance, reporting process through FixMyStreet portal and how it is incorporated into wider integrated street cleansing and waste contract with Veolia.
- 1.3. This report also provides an overview on Don't Mess with Brent campaign and cites some case studies with outcomes achieved through enforcement actions carried out by officers.

2.0 Recommendation(s)

- 2.1 It is recommended that the committee note the contents of this report.
- 2.2 It is recommended that the committee note improvements made through performance monitoring of Veolia contract, reporting through FixMyStreet portal, enforcement actions undertaken and the wider impact of Don't Mess with Brent campaign on fly tipping and littering.

3.0 Detail

3.1 Contribution to Borough Plan Priorities & Strategic Context

- 3.1.1 Brent's Borough Plan sets out how we can achieve one of our strategic priorities "A Cleaner, Greener Future", with the objective to future-proof the Borough to bring about positive changes to keep the environment clean and develop our services to residents. Waste and Recycling performance has a direct link with the Borough's aim to reduce the overall proportion of household waste being generated by encouraging more recycling and promoting reuse of items. The Simpler Recycling reforms mandate separate collection of paper and card, and food roll out to all properties in Brent by 2026. By having the back-end systems / processes in place, we can collect more types of recyclable materials.
- 3.1.2 One of the desired outcomes of our Climate & Ecological Emergency Strategy is to tackle climate change by reducing consumption, resources, and waste. A key factor in helping to achieve this outcome is to reduce carbon emissions from the disposal of recyclable packaging.
- 3.1.3 Effective waste collection systems that promote more sustainable waste management help change behaviours and create better environmental outcomes and particularly support the council's climate action programme.

3.2 Background

3.2.1 Definitions of fly-tipping and littering, including the distinction between them.

Under Waste Data Flow (WDF) guidance, the distinction between littering and fly-tipping is based on the size of the waste, using a wheelbarrow as the practical benchmark.

A fly-tip is defined as waste that is too large to be removed using a standard hand-sweeping barrow. Simply, this means that a single full bin bag, several carrier bags of waste dumped together, would be classified as a fly-tip.

By contrast smaller items of waste that be collected via standard street sweeping equipment and methods is generally classified as litter.

3.2.2 How fly-tipping and littering services sit within the wider Integrated Street Cleansing, Waste Collections and Winter Maintenance contract

Fly-tip removal and litter services form part of the core contract offering within the Integrated Street Cleansing, Waste Collections and Winter Maintenance contract. Fly-tipping removal is not costed per fly-tip but paid for on a resource basis. Street littering service costings are based on the number of operatives required to service a pre-defined schedule. If we increase the frequency, then more resource will be required at an additional cost.

4.0 Contractor Performance and monitoring

4.1 Overview of the Veolia service offer relating to fly-tipping and littering.

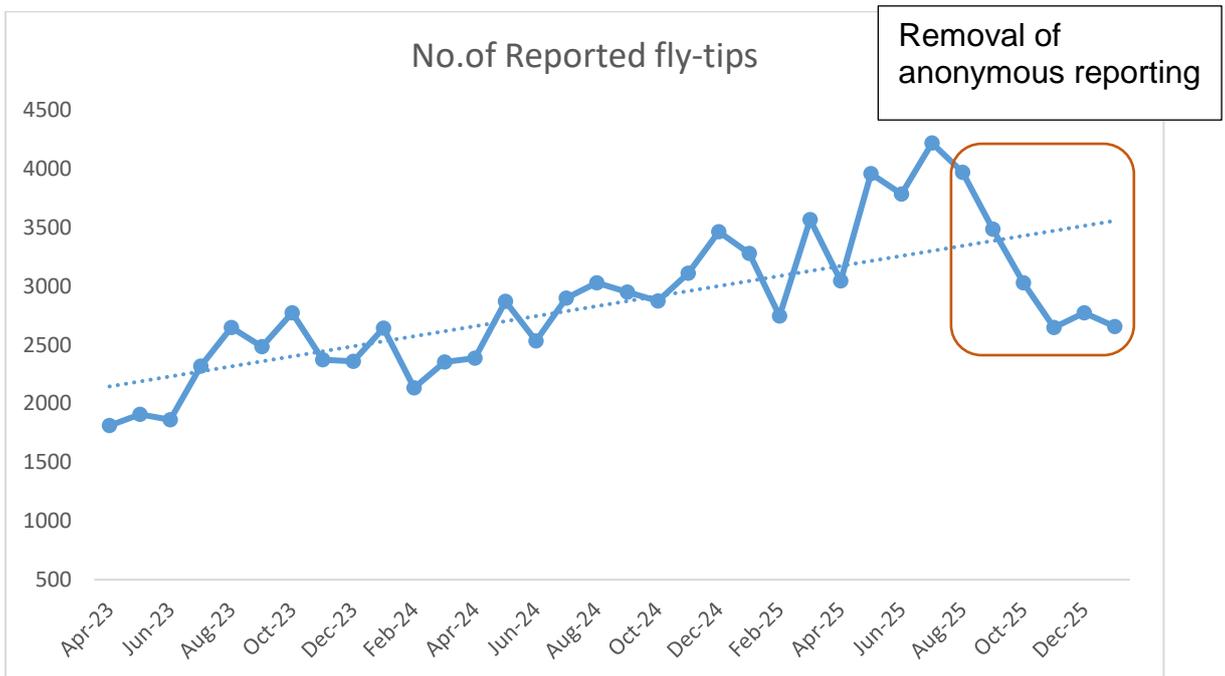
Veolia offer a “clear as you go” fly-tip removal service for Brent’s public highways. They also assist with clearing large fly-tips from parks and open spaces. The street sweeping service covers all public footpaths within the Borough. The streets are swept based on a schedule which is regularly reviewed / adjusted based on intelligence. Veolia also litter picks grass verges. In addition, we also have a rapid response team from Veolia in each of the five Brent Connects area. Their task is to survey the area and proactively clear flytip and litter in those areas. They visit the hot spots on a regular basis (Monday-Friday) and pick up any FixMyStreet reports generated by residents, members or staff and deals with them.

4.2 Contract performance over the past two years, including service outcomes and Trends (incident levels, hotspots, response times, clearance rates) & Contract monitoring arrangements.

4.2.1 There are robust contract monitoring arrangements in place in the way of regular meetings with all stakeholders. Joint inspections take place between Veolia and council officers and feedback received from residents and other council workers are taken into consideration. There is an internal Power BI dashboard created to monitor street cleansing and fly-tipping reports monthly. At the monthly contract meetings with Veolia, there is a presentation highlighting performance issues seen in the previous month to discuss forward steps and analysis emerging trends and potential hotspot areas. This information is also then cascaded to the neighbourhood managers to ensure they are aware of any emerging changes within their connect areas.

4.2.2 Incidents level and Trends

The number of reported fly-tipping incidents has steadily increased since the introduction of FixMyStreet in the borough. On average, around 90 fly-tips are reported each day via FixMyStreet. Although daily figures can fluctuate due to reporting behaviour, such as periods of increased activity from high-reporting residents as well as seasonal and connect area variance. There is also ongoing monitoring/reviewing which enables resources are used effectively to manage demand as well as ensuring that fly-tips are removed quickly to maintain cleaner streets and resident satisfaction.



The above line graph shows an initial steady increase of the fly-tip reports within the borough which can be attributed to FixMyStreet’s ease of use and accessibility. The decrease in fly-tip reporting since August 2025 is mainly attributed to the removal of anonymous reporting feature on the platform. This action was necessitated due to receipt of several inappropriate messages received on the platform. Although there is a decrease in reporting, the change has resulted in the improvement of standards of reports made.

4.2.3 Hotspots

Hotspot analysis is used to identify locations of the repeat or persistent fly-tipping. These hotspots are initially identified using resident reports made through the FixMyStreet platform. When streets are consistently reported for flytips and meet an internally agreed threshold level, they go on our hotspot lists and are then closely monitored by Veolia’s cleansing team. If further intervention is needed, then these hotspot areas are escalated to our Waste Enforcement team who can place temporary cameras for further monitoring.

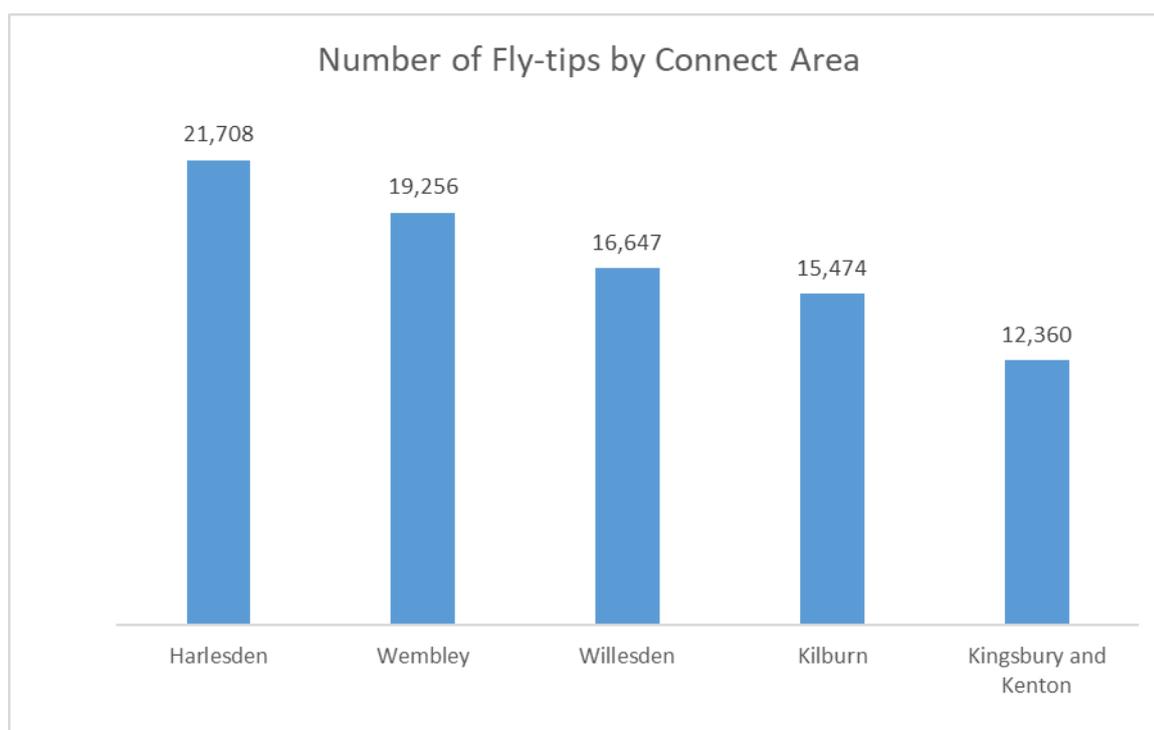
4.2.4 Response Times and Clearance Rates

Performance has been consistently high. Over the last two years, Veolia have cleared 98.95% (86,013) of reported fly-tips within the agreed Service Level Agreement (SLA), exceeding the 95% target.

On average around 90 fly-tips are reported to Veolia daily via FixMyStreet, with most fly-tips being collected within 24-48 hours (excluding items i.e. sofa, mattresses, armchair that contains PoPs (Persistent Organic Pollutants), as

they must be collected separately due to legislative requirements. The prompt response from Veolia crew helps maintain clean communities as well as maintain public confidence with the FixMyStreet platform.

Our analysis since April-23 has shown that Harlesden connect area has recorded the highest total number of fly-tips (21,708) since April-23, with 57% of Harlesden Connect fly-tips taking place with the Harlesden & Kensal Green ward (10,684). The lowest reported connect area is Kingsbury and Kenton (12,360), Northwick Park in the Wembley Connect area have the lowest total number of reported fly-tips (1,406). The graph below provides the number of fly tips reported in each Brent Connect area since April 2023.



4.3 Assessment of value for money

The FixMyStreet Portal was introduced in April 2023 to coincide with the new Veolia contract. There were several changes made to the street cleansing schedule in comparison to the old contract to generate savings. The new Veolia contract focussed on intelligence-based street cleansing. This intelligence is received through FixMyStreet reports and rapid response teams working in each Brent Connect Area. We have managed to retain reasonable level of street cleanliness across the borough without additional cost to the contract, providing value for money.

4.4 Areas for improvement and key risks

Key risks to the current operating system are:

- Service failure and under performance by the contractors

- Technical issues leading to unavailability of FixMyStreet platform for reporting
- Workforce/industrial actions leading to difficulties in recruitment of drivers and crew collecting flytips and littering
- Lack of flexibility on behalf of contractors and suppliers to adapt to legislative changes or meet emerging demands or council's requirement

Areas for improvement are:

- Ongoing development work with FixMyStreet platform to make it more user friendly and accessible to residents
- Review the cleansing schedule to address consistent issues in different locations and agree on a longer-term plan with the contractors
- Better connectivity of internal systems when it comes to flytipping reports and enforcement actions undertaken

4.5 **Case Studies**

Example 1 – 8020753

Coles Green Road – We receive an increased number of Fly-Tip reports from Coles Green road. During this time of increased reporting within the area, residents used the platform to provide feedback on the progress reported on work being completed.

Report created and allocated on Wednesday 13th August 2025 at 15:47. On the 14th August at 08:09 the resident has stated their concern as the fly-tip had not been removed. Later the same day the fly-tip was removed.

This demonstrates that resident actively monitor our response and will use the platform to raise concerns when delays have been seen.

UPDATES		Category
Moderate this update	<p>Allocated to Crew</p> <p><i>State changed to: In progress</i></p> <p>Posted by Brent Council (Brent Council) at 15:47, Wed 13 August 2025</p>	<input type="text" value="Fly-tip Small - Up to 3 black bags"/>
Moderate this update	<p>Still there</p> <p><i>Posted by Brent Accountability team at 08:09, Thu 14 August 2025</i></p> 	<p>UPRN reference</p> <input type="text"/>
Moderate this update	<p>Completed</p> <p><i>State changed to: Fixed</i></p> <p>Posted by Brent Council (Brent Council) at 13:26, Thu 14 August 2025</p>	<p>Property ID</p> <input type="text"/>
		<p>Service ID</p> <input type="text"/>
		<p>Type of waste</p> <input type="text" value="Construction / DIY"/>
		<p>Did you see the fly-tipping take place</p> <input type="text" value="No"/>
		<p>usrn</p> <input type="text" value="20201557"/>
		<p>If 'Yes', are you willing to provide a statement?</p>



Example 2 - 8726842

Resident has reported littering on Hay Lane on 20th January 2026 at 11:05. the contractor has stated 6 minutes later that the job was completed. The resident has then responded our contractor stating it is completed at 15:59 with a response *“Hi, I don’t know why this report has been recorded as fixed. The litter remains in situ all along the footpath, gutters and road at the lower end of Hayland Close.”*

The case demonstrates the value of resident feedback for service delivery which enables the council to investigate issues of non-delivery and premature job closures with the contractor.

Hayland Close

Reported via iOS in the Street cleaning - Street needs sweeping category anonymously at 11:05, Tuesday 20 January 2026

Sent to Brent Council 1 minute later. FixMyStreet ref: 8726842.



Litter

Moderate

☆ Shortlist

UPDATES

Moderate this update

Completed

State changed to: Fixed

Posted by **Brent Council** (Brent Council) at 11:11, Tuesday 20 January 2026

Moderate this update



Hi, I don't know why this report has been recorded as fixed. The litter remains in situ all along the footpath, gutters, and roadway at the lower end of Hayland Close.

Posted anonymously at 15:59, Tuesday 20 January 2026

5.0 Reporting and Insights

5.1 Overview of reporting routes available to residents and councillors

Residents and councillors do have access to reporting for litter and fly-tipping through complaints and member enquires; however, the primary reporting platform is FixMyStreet which is accessible via the FixMyStreet web application. This platform is used consistently by residents, council staff and elected members, providing a single, shared route for reporting fly-tipping and street cleansing issues.

Since its introduction in April 2023, FixMyStreet has been bespoke configured to meet the borough needs by evolving in response to service requirements and user feedback, resulting in an invaluable intelligence tool. It is used for capturing reports but also for generating insight into the scale, type and location of fly-tipping and cleansing activity across the borough.

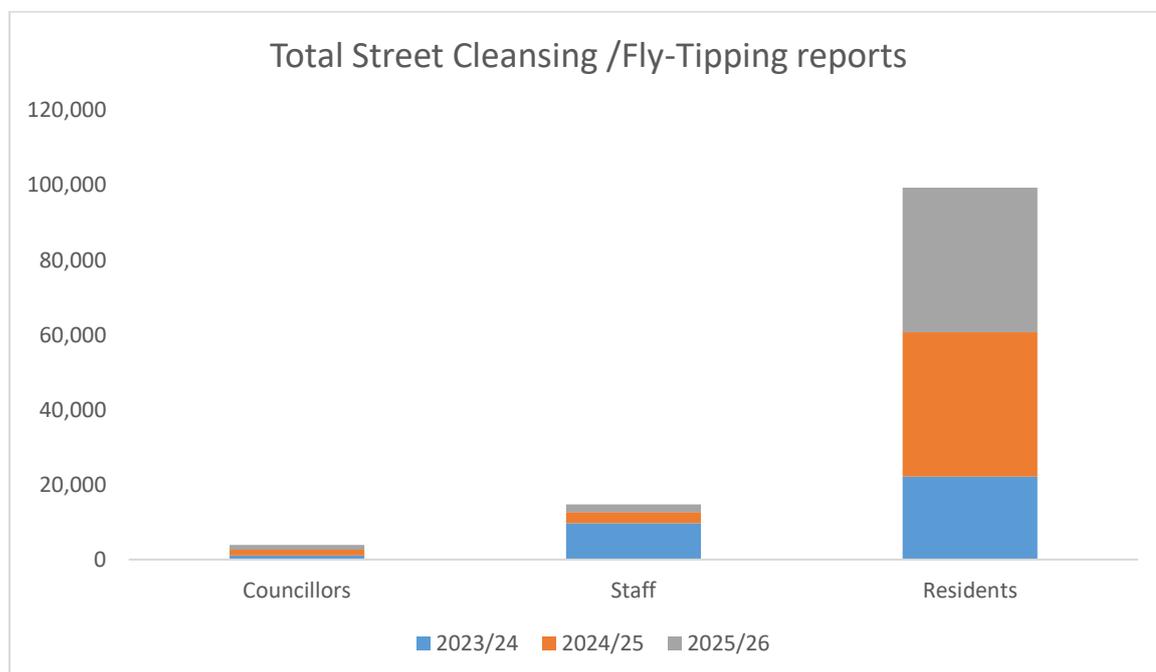
As FixMyStreet is integrated directly into Veolia’s IT system via an Application Programming Interface (API), it enables reports to be recorded on their database in real time. This integration delivers several key benefits which include:

Faster response time - As reports are send directly to the contractors operating teams.

Improved Performance assurance – As the system provides confirmation of when reports are acknowledged and completed.

5.2 Key issue types and sources of reports

The primary source of both fly-tipping and street cleansing reports is from residents. In 2024/25, residents created 38,625 reports, accounting for 90% of all street cleansing and fly-tipping reports received during the year. The graph and table below provide a breakdown for each user category.



Fly-Tipping / Street Cleansing reports	Councillors	Staff	Residents
2023/24	1,125	9,747	22,123
2024/25	1,462	2,984	38,625
2025/26** (Apr/Jan)	1,284	1,986	38,601

Total	3,871	14,717	99,349
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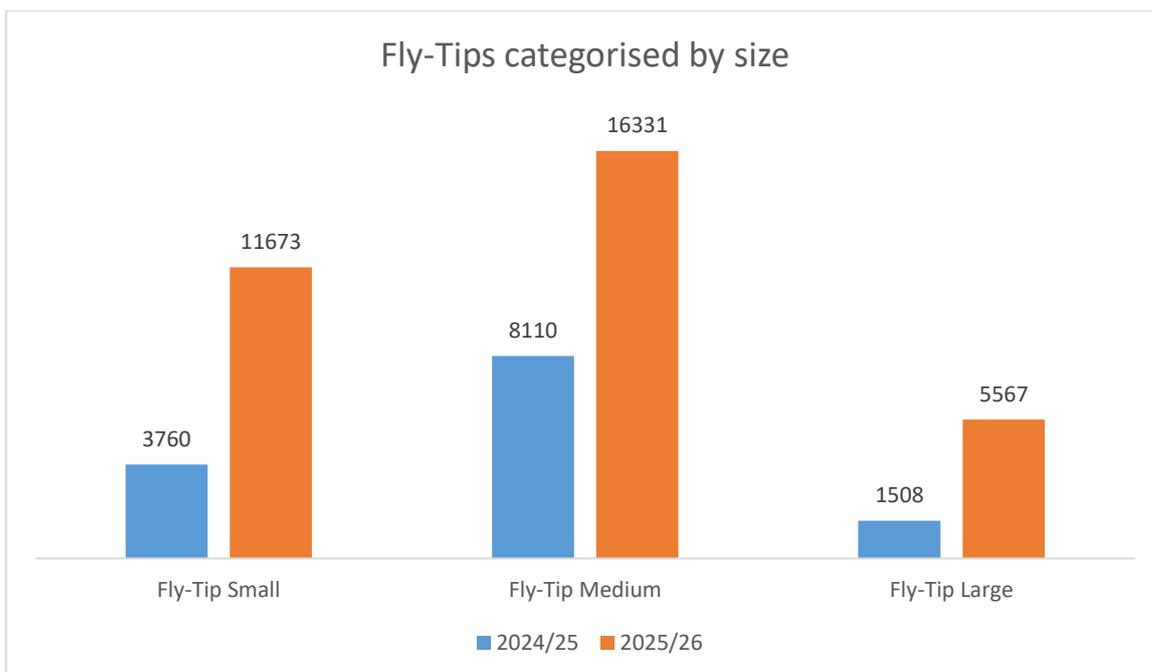
What we can observe from the table above is that total number of street cleansing and fly-tipping reports were initially being made by staff in the 2023/24 financial year. This largely reflects the early introduction of FixMyStreet. But gradually we can see significant decreases in staff reporting in the following financial years. This indicates a reduced reliance on intermediary reporting by staff and demonstrates FixMyStreet becoming embedded as a self-service channel for residents.

Key Issue – Fly-Tipping

As mentioned previously, we separated Fly-tips into three sub-categories (small, medium and large) in November 2024, as we could see that the Defra used size definitions were potentially confusing residents as shown below:

Category	Definitions
Single black bag	A single bin bag containing waste. Cost of removal/disposal will be entered for you based on national average costs
Other single item	One piece of furniture or equipment. There may also be a few small items that would not on their own constitute a fly-tip. Cost of removal/disposal will be entered for you based on national average costs.
Car boot load or less	The rubbish could be broken down and squeezed into a large boot of a car. About 1 cubic metre maximum. Up to 5 large bin bags. Cost of removal/disposal will be entered for you based on national average costs.
Small Van load	Bigger than the car boot load but that the rubbish could be broken down and squeezed into an Astra size van. About 4 cubic metres. Between 6 and 15 bin bags. Cost of removal/disposal will be entered for you based on national average costs
Transit Van load	Bigger than the small van but that the rubbish could be broken down and squeezed into a transit size van. About 10 cubic metres. A large 3-piece suite of furniture would fall into this category. Between 16 and 30 bin bags. Cost of removal/disposal will be entered for you based on national average costs.
Tipper lorry load	A single load from an 8-wheeled tipper truck. You will need to enter your estimated or actual cost of removal and disposal.
Significant/multiple loads	A multiplicity of the above. You will need to enter your estimated or actual cost of removal and disposal.

By changing the category to small, medium and large it allows us to gain a better understanding of the fly-tipping size that are occurring within the borough



Analysis of fly-tipping reports show that 52% of the total number of fly-tips have been classified as medium-sized fly-tips since category change took place in November 2025.

Total Categorised Fly-tips (Since Nov-25)	Count	%
Small Fly-Tips	15,443	33%
Medium Fly-Tips	24,441	52%
Large Fly-Tips	7,075	15%

There is an indication that some resident may be over-classifying smaller fly-tips as medium-sized. This could be likely driven by the perception that selecting a larger category may result in a more prioritised response from the contractor. The introduction of size-based categories, supported by pictorial guidance, has been instrumental identifying reporting behaviour for the first time.

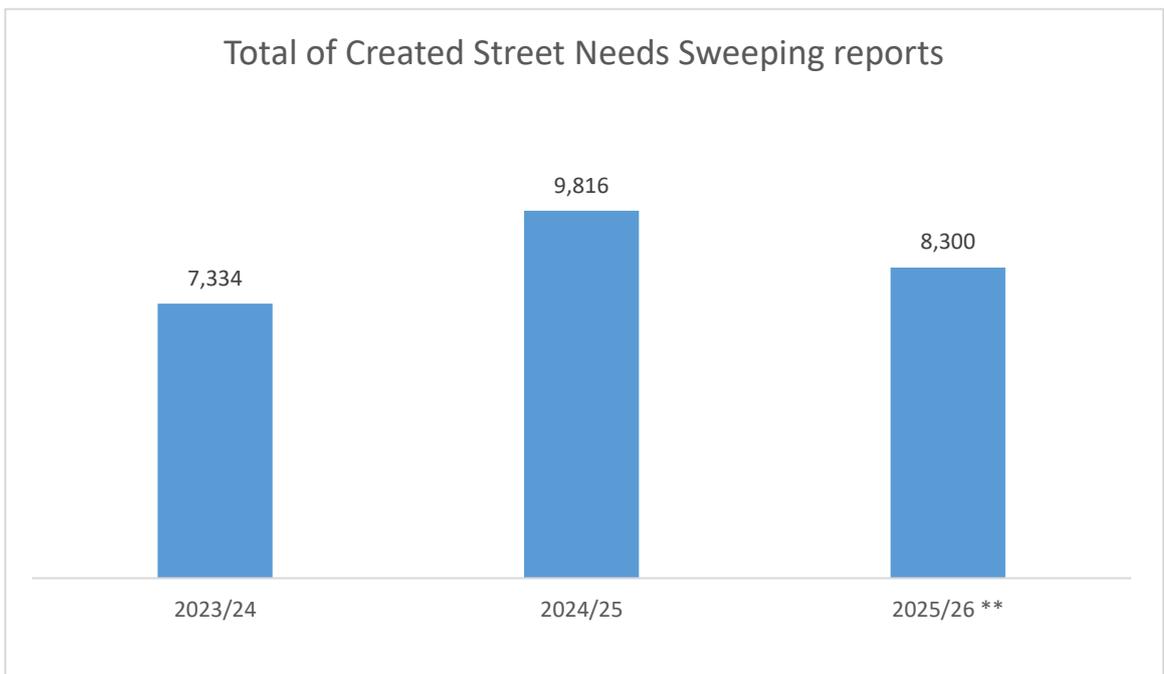
A further notable trend relates to changes in reporting behaviour following the removal of anonymous reporting across the FixMyStreet platform in September 2025. When comparing January 2026 data to August 2025 (the final month in which anonymous reporting was available), there has been a 24% reduction in fly-tipping reports.

While a reduction in report volumes could be initially perceived as a concern, this change provides important positive assurance as residents are now required to log in to FixMyStreet, meaning reports are now made with clear intent and accountability as well as an improvement in the qualitative quality of report.

Key issue- Street cleansing (Street Needs Sweeping)

The Street Needs Sweeping category enables residents to report locations where street cleanliness falls below a particular standard.

The aim of this category is to support the transition to intelligence-based cleansing rather than a rigid street cleansing schedule. Since its introduction, an average 750 street cleansing reports are created per month with 25,450 total reports created since April 2023 with residents making 83% (21,107) of the total number of reports. Highlighting strong resident engagement with this category.



From the above graph we can see there has been a steady increase in street needs sweeping reports made with a 34% increase in reporting from 2023/24 to 2024/25.

Through FixMyStreet geospatial functionality we can identify which Connect area these reports are generated from.

Connect Area	Count
Kilburn	223
Wembley	216
Willesden	172
Harlesden	168
Kingsbury and Kenton	89
Total	868

While Street Needs Sweeping do not reach the same monthly volume as Fly-Tipping, they remain operationally significant. By working closely with both Veolia and our Neighbourhood Managers, these reports help identify areas that may require additional cleansing. Regarding observed insight we can confirm that there is an increased number of reporting in south of the borough compared to the north.

5.3 Use of FixMyStreet, including: Effectiveness in supporting fly-tipping and littering reporting

The use of FixMyStreet has been integral in supporting the reporting of fly-tipping and littering as well as identifying environmental crime and cleanliness hotspots across the borough. FixMyStreet provides a consistent and accessible report route for residents. For staff FixMyStreet 'summary statistics' generates high-quality location- specific data that underpins both operational response and strategic insight.

The report data generated from Fly-Tipping and Street Cleansing reports are made available internally through Power BI dashboards, enabling officers to analyse trends from a Brent Connect Area level, to a granular street level when required. This level of granularity allows for timely identification of emerging hotspots, ensuring that resources are deployed effectively based on empirical information rather than anecdotal evidence.

FixMyStreet data also plays a central role in performance management and governance. On a monthly basis we present data on reporting volumes and data trends at the Contract meetings and review the contractor performance against agreed KPI's, identify any areas of concern and agree any required operation or response to situation that may have arisen in the previous month.

Through this dual use of providing operation intelligence and formal performance oversight – FixMyStreet has become a critical tool in ensuring that fly-tipping and littering issues are not only responded in a timely manner but continuously reviewed.

5.4 Analysis of reports (e.g. April 2025–present), broken down by type, source (e.g. public, councillors etc) and ward.

The detailed analysis of FixMyStreet performance data on issue type, source and ward level is covered under section 5.2- key issues and sources of reports

5.5 Strengths and limitations of current reporting arrangements

The introduction of FixMyStreet reporting tool has provided several benefits as listed below. Any reporting limitations have been worked through with the systems development team. They are very proactive in identifying and resolving issues and suggesting development ideas where practical.

Street cleansing reports ("Streets needs sweeping") submitted via FixMyStreet now provide a significantly richer dataset than was previously

available. This enhanced reporting capability has been a critical enabler in the council's transition to an intelligence -led street cleansing strategy, ensuring that decisions are supported by evidence that is sufficiently robust.

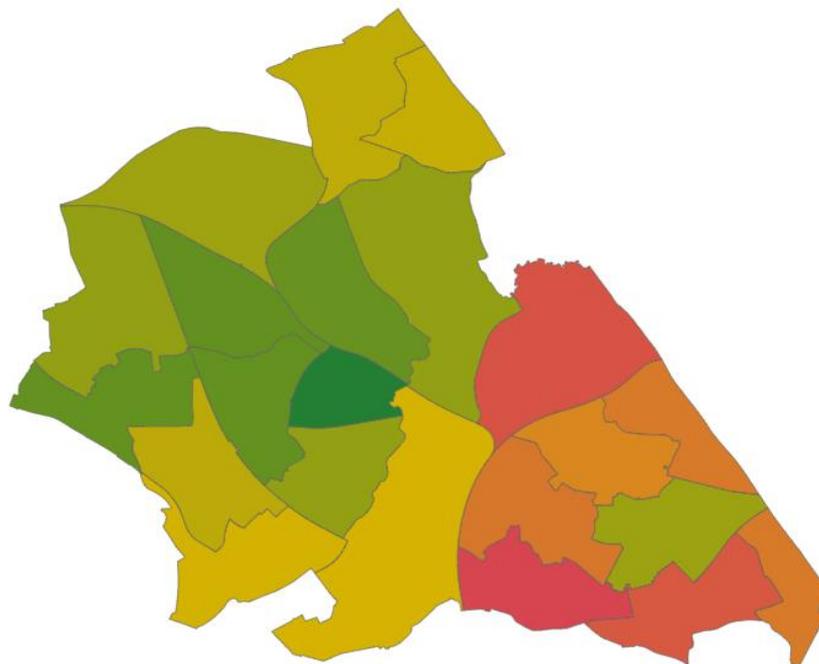
In addition to description of the issue and photographic evidence, each report includes (but not limited to):

- Precise geospatial information (latitude and longitude)
- Ward -level attribution
- Time-stamped contractor data, showing when a resident's report was acknowledged and completed.

This level of detail has strengthened performance oversight, improved transparency and enabled more details analysis of cleansing demand across the borough.

This enhanced dataset has delivered several important benefits:

- Improved spatial understanding of demand - The inclusion of geospatial data enables the service to map where street cleansing issues are most frequently reported across the borough. This level of spatial insight was not available and represents a step-change in how demand can be quantified and analysed.



- Better support for neighbourhood based management - The ability to visualise cleansing reports geographically has become a valuable tool for Neighbourhood managers, allowing them to identify localised hotspots within their areas, supporting more targeted engagement and proactive monitoring.

- Stronger performance transparency and assurance – The availability of acknowledgement and completion timestamps strengthens oversight of contractor performance, enabling clearer monitoring and service standards at both ward and Brent Connect Areas level.

Community Skips locations – These are based on areas of high fly-tipping with the connect area of the community skip event. The geospatial data used for this is from the fly-tipping dashboard, source being the FixMyStreet platform.

Fly-Tip categorisation- In November 2024, the fly-tipping categorisation framework was enhanced by splitting the original single category into three size-based categories: small, medium and large (based on the Defra definition of a fly-tip's size). This was supported by the introduction of the pictorial guidance, enabling resident to more accurately classify a fly-tip at the point of reporting. This ensure firstly the appropriate operational response is deployed first time and helps when we are trying to gather information about fly-tipping within the borough. his improvement has delivered several key benefits:

- Improved data quality and insight – Redefining the categories provided clearer understanding internally of the scale and nature of fly-tipping incidents across the borough. For the first time the service could reliably quantify fly-tips by size rather than relying on Defra's definition, which are confusing to residents.
- Improved resident engagement and confidence – Introducing pictorial guidance has made reporting clearer and more accessible for residents, displaying our ongoing efforts for more accurate reporting which can be passed on to our enforcement when needed.
- Stronger Performance assurance - The enhanced categorisation provides us with more robust evidence to monitors trends and assess service performance as well as evaluate the effectiveness of interventions over time.

6.0 Fix My Street Contract Retender

6.1 Current contract requirements

The current contract is for the delivery and support of an integrated platform for reporting of street-based issues and household waste, which includes online self-service for members of the public, a single system for Contact Centre staff to use, and reporting tools and dashboards for front-line teams. The procurement of this contract was designed to benefit those living in Brent.

6.2 Early insights from initial assessments into emerging lessons learned, gaps, and opportunities within the current contract

As explained in the sections above, our initial assessment of the current contract with FixMyStreet is very positive. We have seen several benefits of

utilising this tool. Our performance of the waste and cleansing contract has tremendously benefited from the usage of this tool. The data received from the tool is used to plan future projects like community skips, hot spot areas in the borough that requires closer monitoring by the contractors.

There is a direct integration between FixMyStreet and IT systems used by Brent contractors in waste and street cleansing, Parks and Green spaces, Highways etc. This reduces the numerous interactions between the residents and the council. The benefits are being appreciated by the council's contact centre too. The waste work modules provided by the contractor allows self-service functionality to residents when they want to order bins, report a missed bin, check their collection dates and various other things. The system allows a good level of engagement with residents whereby residents can provide comments, upload images etc.

It has taken us a couple of years to fully utilise the system and promote its usage widely to Brent residents, staff and members. As the contract is coming to an end in October 2026, we have paused any further development opportunities within the current contract. We see no immediate gaps within the contract. Any lessons learnt or identified over the past two years of contract were picked up with the contractors and a resolution was sought either through discussions or development work. There is a good working relationship between council officers and the contractor.

6.3 Initial thinking on future social value commitments for the new contract, building on existing activity and aligning with Council priorities (important to members)

We have recently reached out to colleagues in Shared Technology Services and central procurement to start discussion on the procurement process. Social value will be further explored as part of those discussions. Officers in Public Realm will explore the possibility of plugging in more resident facing services and align with council priorities where possible in the new contract. But it is too early to mention initial ideas and activities that we would like to see in the new contract without much research or discussion.

6.4 Future contract and retendering timeline

The current contract started on 04 October 2022 and went live in April 2023 and will come to an end on 04 October 2026. As part of the procurement discussions, a timeline will be drawn to enable meet the procurement requirements and council's governance process for sign off.

7.0 Enforcement

7.1 Enforcement Approach and Powers

Environmental Enforcement's approach to enforcement in relation to littering and fly-tipping is governed by the Council's overarching Enforcement Policy, which sets out the principles of proportionality, consistency, transparency, and

accountability. In line with this policy, Environmental Enforcement's primary objective in dealing with both domestic and commercial waste offences is to achieve compliance. Formal enforcement action is taken where appropriate, particularly where there is evidence of deliberate, negligent, or repeat offending. In respect of littering and fly-tipping, the Environmental Enforcement exercises powers under the Environmental Protection Act 1990. This includes:

- Section 33, which relates to the unlawful deposit, treatment, or disposal of controlled waste (fly-tipping offences).
- Section 34, which places a duty of care on those who produce or handle waste to ensure it is transferred and disposed of lawfully.
- Sections 87 and 88, which create offences relating to littering and provide powers to issue Fixed Penalty Notices (FPNs) as an alternative to prosecution.

These powers enable Environmental Enforcement to investigate offences, issue Fixed Penalty Notices, and where necessary, prepare and pursue prosecutions through the courts.

The operational structure of the enforcement function supports both visible deterrence and more complex investigations. The service includes:

- Uniformed Neighbourhood Patrol Officers, who undertake on-street enforcement activity. Their role includes issuing on-the-spot Fixed Penalty Notices for littering offences, investigating fly-tipping incidents, searching for evidential material within deposited waste, and issuing FPNs for fly-tipping where sufficient evidence is identified. Their uniformed presence also provides a visible deterrent and reassurance to residents.
- Environmental Enforcement Officers, who manage more complex and large-scale investigations, including repeat offenders and commercial waste offences. They compile case files for prosecution and represent the Council's interests through the court process. In addition to fly-tipping and littering matters, they also deal with related environmental enforcement issues such as abandoned vehicles and unauthorised scaffolding, ensuring a coordinated regulatory approach.

This tiered structure allows Environmental Enforcement to respond swiftly to lower-level offences while maintaining the capacity to pursue more serious or persistent breaches through formal legal proceedings. The combination of visible patrol activity and robust case preparation supports both compliance and enforcement outcomes.

7.2 Joint Working Between the Council and Waste Contractors, Veolia

Effective joint working arrangements are in place between the Neighbourhood Patrol Service and Veolia. Neighbourhood Patrol Officers hold regular operational on street meetings with Veolia crews, typically in the early morning while daily rounds are being completed. These meetings provide an opportunity to share intelligence, identify emerging issues, and agree targeted action in known problem locations. This coordinated approach supports the efficient deployment of both cleansing and enforcement resources. Veolia crews play

an important role in supporting enforcement activity. As the first responders to many fly-tipping incidents, operatives are instructed to identify and preserve any evidential material found within deposited waste. This information is referred to enforcement officers to support investigations and, where appropriate, the issuing of Fixed Penalty Notices or progression to prosecution.

In addition, Veolia provides intelligence relating to businesses suspected of improperly disposing of commercial waste, contributing to fly-tipping. This intelligence supports duty of care investigations and enables enforcement officers to take proportionate action where non-compliance is identified. Veolia operatives also act as additional “eyes on the street”, reporting incidents of littering, fly-tipping and related environmental offences encountered during their daily duties. This enhances real-time intelligence gathering and strengthens Environmental Enforcement’s overall enforcement capability. This collaborative approach ensures that operational cleansing and enforcement functions are aligned, enabling a proactive and intelligence-led response to littering and fly-tipping across the borough.

7.3 Performance and Impact of Enforcement Activity

Enforcement activity in relation to littering and fly-tipping is monitored through a combination of internal performance reporting and statutory submissions to national reporting frameworks. Quarterly enforcement figures are submitted to the Waste Data Flow (WDF) system, providing an annual record of enforcement actions taken by Environmental Enforcement. These figures demonstrate a year-on-year increase in enforcement activity, reflecting an enhanced focus on fly-tipping investigations and a more proactive enforcement approach. Where Don't Mess with Brent (Wanted) campaign are implemented in identified hotspot areas, there is evidence of significant short-term reductions in fly-tipping. In such locations, Environmental Enforcement has observed approximately a 50% reduction in fly-tipping incidents over the six-week period following the campaign.

These outcomes indicate that the combined approach of visible enforcement, intelligence-led investigation, and targeted campaigns can effectively reduce fly-tipping. Environmental Enforcement continues to monitor performance to ensure enforcement activity is proportionate, targeted and aligned to emerging trends.

7.4 Income generated from enforcement

In calendar year 2025, Environmental Enforcement generated approximately £426,000 in income from littering and fly-tipping Fixed Penalty Notices.

7.5 Case studies

Case Study 1: Enforcement Action Following Improper Waste Disposal

Background

Veolia’s PM shift crews identified two separate incidents of improper waste

disposal by a local business. On both occasions, the business used black bin bags rather than the required Veolia trade waste bags, and the recycling contained significant contamination.

Action

The incidents were reported by Veolia crews and promptly investigated by Environmental Enforcement. The evidence provided by the crews, including details of the waste contamination and the improper disposal method, supported the investigation.

Outcome

As a result of the investigation, a £500 Fixed Penalty Notice for fly-tipping was issued to the business. The FPN was paid promptly, demonstrating swift compliance following enforcement action.

Impact

This case demonstrates the effectiveness of joint working between Veolia and Environmental Enforcement Team. It also highlights the role of operational crews as key intelligence sources, enabling rapid investigation and resolution of waste offences.



Case Study 2: Residents Linked to 18 Dumped Bags

Background

Veolia crews reported a fly-tipping incident at the junction of Dollis Hill Lane and Brook Road. A total of 18 black bags of domestic waste, along with drawers and other furniture, had been dumped at the location.

Action

Environmental Enforcement Officers attended the site and inspected the waste. Evidence found within the bags, including letters, parcels and food delivery bags, linked 11 of the bags to the same address, with two occupant names identified.

Outcome

Fixed Penalty Notices (FPNs) were issued to the identified residents and were

promptly paid. This case demonstrates effective evidence gathering and enforcement following intelligence provided by operational crews.

Impact

The outcome reinforces the Council's zero-tolerance approach to fly-tipping and highlights the importance of partnership working between Veolia crews and enforcement officers. It also provides a clear deterrent message to residents and businesses that fly-tipping will not be tolerated.



Case Study 3: Fly-Tipping Incident – Commercial Fridge Abandoned on Kilburn High Road

Background

During a routine morning patrol, an Environmental Enforcement Officer identified a large commercial fridge that had been abandoned on Kilburn High Road. The fridge was left on the pavement and was causing an obstruction to pedestrians.

Action

Initial enquiries with nearby businesses did not identify any witnesses. However, the officer provided the Control Room with the time of the incident and potential CCTV locations, enabling the incident to be investigated further. Due to the limited time window and effective CCTV review, the offender was successfully identified from the footage.

Outcome

A Fixed Penalty Notice (FPN) of £1,000 was issued to the responsible shopkeeper. This case demonstrates the Council's ability to pursue enforcement action in commercial waste and fly-tipping incidents, including where initial evidence is limited.

Impact

The outcome highlights the importance of proactive patrolling, effective use of CCTV and robust investigative procedures. It also reinforces the Council's deterrent message that fly-tipping and obstruction of public footways will be subject to formal enforcement action.



8.0 Communications and Engagement

8.1 Communication, education and behaviour change initiatives through Dont Mess with Brent campaign

We were worst in the country for fly-tipping in 2024. We will be in the 23rd position this year. This is a significant improvement.

- We have tripled our enforcement officers from 6 to 18
- We continue to take a zero-tolerance approach to fly-tipping and have more than doubled the amount of fines we have handed out. With over 5,700 fines handed out to people that are ruining our streets.
- Our fines are the highest they legally can be and are a deterrent to those considering leaving a mess in the public realm.

Communications: Our approach has been multi-faceted, but has focused mainly on messages around zero-tolerance across the whole borough. This includes:

- Lamppost banners across over 60 hotspot locations for fly-tipping
- Adverts on billboards across 60 sites in the borough
- Numerous national media coverage
 - [Man who dumped bed by road fined £4,600 by Brent Council - BBC News](#)
 - [Brent Council in paan-spitting crackdown - BBC News](#)
 - [Fly-tipping clampdown sees fines double in Brent - BBC News](#)
 - [Brent Council Invests £30,000 Annually to Combat Paan Stains](#)
 - [Brent businessman fined after employees dumped meat and fish - BBC News](#)
 - [Brent Council cracks down on fly-tipping with fines and patrols - BBC News](#)
 - [Fly-tipper is fined £4,600 after he was caught on camera dumping a bed at a roadside | Daily Mail Online](#)
- Video and social media highlighting the worst offenders, with a lot of comments and reaching tens of thousands of residents

- [Do you know the culprits? Caught on Camera - Don't Mess With Brent](#)
 - [\(6\) Instagram](#)
- Viral video on paan with over one million views on Instagram and one video on TikTok receiving over four million views
 - [\(6\) Instagram](#)
- A visit from the Secretaries of State to announce more powers for local authorities to crush cars that are used in fly-tipping
 - [‘I can’t wait to crush more vehicles’ – Brent Council leader vows crackdown on fly-tipping - Harrow Online](#)
- Our communication colleagues have also given presentations to numerous other local authorities who want to replicate this campaign

The **Don’t Mess with Brent** campaign continues to demonstrate strong and measurable impact across the borough. By combining clear messaging, visible enforcement, and community engagement, the campaign has helped shift behaviours and reinforce shared responsibility for keeping Brent clean. Residents and businesses alike have responded positively to the campaign’s direct, no-nonsense approach, which has made the expectations around waste disposal and street cleanliness unmistakably clear.

A key strength of the campaign has been its visibility. The bold branding, targeted signage, and presence across high-footfall areas have ensured that the message is consistently reinforced. This visibility has contributed to increased awareness of enforcement activity and a greater understanding of the consequences of non-compliance. As a result, we have seen improved compliance in several hotspot locations, alongside a noticeable reduction in repeat offending.

The campaign has also supported stronger collaboration between council teams, local businesses, and community groups. By aligning enforcement with education and engagement, **Don’t Mess With Brent** has helped build a culture where residents feel empowered to report issues and take pride in their neighbourhoods. This partnership approach has been particularly effective in areas with persistent waste challenges, where sustained messaging and targeted patrols have led to meaningful improvements.

Overall, the campaign has reinforced Brent’s commitment to maintaining clean, safe, and welcoming public spaces. Its success reflects not only the work of enforcement teams but also the willingness of the community to play an active role in protecting their environment. As the campaign continues to evolve, it remains a central part of our strategy to tackle environmental crime and promote civic pride across the borough. Some of the branding and communication examples are listed below.

Comms, Comms , Comms



Old



New



8.2 Targeted engagement with housing providers, landlords, businesses, schools, community groups, and residents

Landlords- As part of a trial, an officer from Environmental Enforcement has been assigned to act as a conduit between the Private Sector Housing team and the Waste and Recycling teams. This approach includes reviewing current workflow processes and improving waste-management compliance within HMOs.

Case Study 1 – 28 Claremont Road, W9

(Mandatory HMO – previously short-term let use)

Outcome: Sustained compliance

Key Developments

- No recorded collection incidents since intervention.
- No obstruction or WOPL reports.
- Planning Contravention Notice issued.
- Short-term bookings cancelled.
- Application for Certificate of Lawful Development submitted (pending).

Observations

- Bin presentation compliant and orderly.
- Recycling information displayed in communal areas.
- Food waste and blue sacks under-utilised but no overflow present.

Assessment

This case demonstrates that coordinated intervention (Waste Enforcement + HMO + Planning) can deliver sustainable improvement when licence holders engage constructively.

Before and After Photos – Claremont Road



Before: Overflow and mixed presentation (contamination / obstructions



After Intervention : Compliant bin allocation and labelled separation. Waste Information in hallway

Schools- As part of WISE's social value commitments, they deliver school visits to engage young people on waste- related issues. They have carried out five such sessions 2025



Business- With the rollout of the new time- banding approach, we have engaged with businesses regarding their waste- management responsibilities, both through written communication and updated signage. In addition, Environmental Enforcement officers are visiting businesses across Brent's town centres—carrying out 800 inspections in 2025—to discuss waste- management requirements directly.



9.0 Stakeholder and ward member consultation and engagement

9.1 There is ongoing engagement with stakeholders with regards to flytipping, littering and FixMyStreet portal. No specific engagement is carried out as part of this report writing.

10.0 Financial Considerations

10.1 There are no financial considerations arising from this report.

11.0 Legal Considerations

11.1 There are no legal implications arising from this report.

12.0 Equity, Diversity & Inclusion (EDI) Considerations

12.1 There are no EDI considerations relating to this report.

13.0 Climate Change and Environmental Considerations

13.1 The Integrated Street cleansing, waste collection and recycling service contract supports the borough plan priorities for; A cleaner Greener Future and Healthier Brent, along with various key strategies including the Brent Climate & Ecological Emergency Strategy 2021-2030.

14.0 Human Resources/Property Considerations (if appropriate)

14.1 There are no HR or property related implications arising from this report.

15.0 Communication Considerations

15.1 Communication is addressed in the paragraphs above.

Report sign off:

Jehan Weerasinghe

Corporate Director, Neighbourhoods and Regeneration

	<p align="center">Resources and Public Realm Scrutiny Committee 24 February 2026</p>
	<p align="center">Report from the Corporate Director, Finance and Resources</p>
	<p align="center">Lead Member: Deputy Leader and Cabinet Member for Finance and Resources - Councillor Mili Patel</p>
<p>Quarter 3 Financial Forecast 2025/26</p>	

Wards Affected:	All
Key or Non-Key Decision:	Not applicable
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
List of Appendices:	Three: Appendix A: Savings Delivery Tracker Appendix B: Prudential Indicators Appendix C: Housing Revenue Account (HRA) Update
Background Papers:	N/A
Contact Officer(s): (Name, Title, Contact Details)	Rav Jassar Deputy Director, Corporate and Financial Planning Email: Ravinder.Jassar@brent.gov.uk Tel: 020 8937 1487 Amanda Healy Deputy Director, Investment and Infrastructure Email: Amanda.Healy@brent.gov.uk Tel: 020 8937 5912

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 3 2025/26.
- 1.2 The Council's revised General Fund revenue budget for 2025/26 is £431.4m. The forecast at Quarter 3 is an overall overspend of £12.5m against the revenue budget, £4.8m overspend against the Dedicated Schools Grant and £2.3m overspend on the Housing Revenue Account. The current budget also reflects £20.4m of savings agreed by Full Council in February 2025. Appendix A sets out the status of the Council wide savings.
- 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 3 forecast for the General Fund

	Budget £m	Forecast £m	Overspend/ (Underspend) £m
Service Reform and Strategy	182.1	190.2	8.1
Children, Young People and Community Development	97.2	99.3	2.1
Neighbourhoods and Regeneration	31.8	29.8	(2.0)
Finance and Resources	32.7	32.5	(0.2)
Residents and Housing Services	32.9	37.4	4.5
Subtotal Service Area Budgets	376.7	389.2	12.5
Capital Financing	38.6	38.6	0.0
Central Budgets	16.1	16.1	0.0
Total Budget Requirement	431.4	443.9	12.5
Funding	(431.4)	(431.4)	0.0
Grand Total General Fund Budgets	0.0	12.5	12.5
DSG Funded Activity	0.0	4.8	4.8
Housing Revenue Account (HRA)	0.0	2.3	2.3
Net Total*	0.0	19.6	19.6

*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 3 forecast for the Dedicated Schools Grant

	Budget £m	Forecast £m	Overspend / (Underspend) £m
DSG			
Income	(250.6)	(250.6)	0.0
Expenditure	250.6	255.4	4.8
Total	0.0	4.8	4.8

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

HRA gross income and expenditure	Budget £m	Forecast £m	Overspend/ (Underspend) £m
HRA			
Income	(69.9)	(73.5)	(3.6)
Expenditure	69.9	75.8	5.9
Total	0.0	2.3	2.3

Table 4: 2025/26 Quarter 3 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	13.4	12.5	(0.4)	(0.5)
Housing - GF	114.1	115.9	112.8	(2.1)	(0.9)
Housing - HRA	50.4	27.6	26.7	3.5	(4.4)
Public Realm	17.8	34.9	31.1	(0.3)	(3.5)
Regeneration	106.5	84.2	82.0	0.1	(2.3)
CYP & Community Development	17.1	25.5	21.4	0.0	(4.1)
South Kilburn	28.0	26.9	20.0	0.0	(6.9)
St Raphael's	3.2	0.4	0.4	0.0	0.0
Grand Total	346.8	328.9	307.0	0.8	(22.6)

Current Economic Environment

- 1.4 In the current and medium term, the economic environment remains weak. Forecasts for growth in GDP for the UK in 2026 is expected to remain modest at 1.5%. This is similar to the forecast for 2025 (forecast growth 1.3%), which may not be sufficient to significantly help many of those people still suffering from the cost-of-living crisis.
- 1.5 Forecasts for CPI inflation in 2026 is expected to average 2.5% which is lower than the 2025 average of 3.5%. The high rate of inflation is driven by rising energy and food prices. Inflation is projected to return to near 2.0% by 2027.
- 1.6 In December 2025, the Bank of England's Monetary Policy Committee (MPC) voted to reduce the base rate to 3.75% from 4.00%. This was influenced by falling inflation, weaker labour market, and reduced fiscal uncertainty. The 2026 interest rate outlook is for a gradual easing towards 3.25 – 3.50% and for stabilisation at around 2.75 – 3.00% in 2027.
- 1.7 The UK unemployment rate is forecast to rise to near 5% in 2026 and is expected to remain elevated till 2027, up from its 2025 level of 4.5%. This projection is based on factors like decelerating economic growth and subdued hiring, though some recent data suggests the labour market is stabilising and the pace of job cuts may have slowed from earlier estimates.

Local Government Funding

- 1.8 In September 2025, Brent was awarded £1.5m as part of the new Pride in Place programme focused on improving public spaces, community spaces and high street and town centre regeneration.
- 1.9 During 2025/26, the government 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 delivered a multi-year funding settlement to local authorities for 2026/27 in December 2025 and enables greater certainty within which to plan budgets for future years.
- 1.10 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 suggested that resources were being diverted away from London and that London's needs were being underrepresented. A response to the consultation was submitted by Brent Council to central government in August.
- 1.11 On 26 November 2025, the Government published the response to the consultation alongside a Local Government Finance Policy Statement, which set out the Government's intended approach to reforming the funding system from 2026/27 and resetting the Business Retention system for the first time

since 2013. This confirmed some changes to the technical details of the reforms as a result of the feedback the government received from respondents to the consultation, which included Brent Council. It also confirmed many of the key details previously announced, including that the 2026/27 settlement will cover the three years to 2028/29 and the Council Tax referendum principles being continued at the 2025/26 rate (2.99% + 2% for adult social care) throughout the settlement period.

- 1.12 The Government also confirmed that the Index of Multiple Deprivation (IMD) and Income Deprivation Affecting Children Index (IDACI) have been updated to include housing costs. These updated indices will be used in the calculation of relative need that will determine the allocation of funding between authorities in the multi-year settlement. As housing costs are a significant factor affecting incomes for people in Brent, it is expected that this change will have a positive impact on the outcome of the Fair Funding Review for Brent Council.
- 1.13 The Ministry of Housing, Communities and Local Government published their provisional Local Government Finance Settlement for 2026/27 – 2028/29 on the 17 December 2025. Brent’s core spending power (a measure of the total resources available for local government, including Council Tax increases) will increase by 9.9% in 26/27 with a 7.7% increase in 27/28 and 7.3% in 2028/29. The final budget will be presented to Cabinet in the Budget and Council Tax report in February 2026, which will incorporate the changes to grants set out in the provisional funding settlement as well as the new burdens and additional costs expected next year.

Maintaining Financial Control

- 1.14 Local government has been 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 by a similar level in 2025/26.

- 1.15 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 subsidies 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.
- 1.16 Since the Quarter 2 forecast report was presented to Cabinet in October 2025, the financial position in the General Fund has worsened by £3.3m. This is due to a £6m increase in the overspend for Service Reform & Strategy due to challenges in the delivery of savings and pressures arising from the cost of placements; a £0.1m decrease in the overspend for Children, Young People & Community Development and a £1.9m increase in the underspend for Neighbourhoods & Regeneration as a result of a comprehensive review of income by the Healthy Streets and Parking Service. In addition, a £500k Homelessness Prevention Grant Top-Up was unexpectedly announced in December, reducing the projected Residents and Housing Services pressure proportionately. The sections below set out the Council's strategy and actions to deal with these pressures for the remainder of the year.
- 1.17 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.
- 1.18 While Brent is not currently in the financial situation of those Councils that have 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.
- 1.19 Given the current forecast overspend, these spending controls will continue throughout 2025/26. Since the Q2 forecast, these spending controls were enhanced. 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. Further details of the spending controls being implemented by directorates are set out below.

- 1.20 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 the Resources & Public Realm Scrutiny Committee note the overall financial position and the actions being taken to manage the issues arising.
- 2.2 That the Resources & Public Realm Scrutiny Committee note the savings delivery tracker in Appendix A.
- 2.3 That the Resources & Public Realm Scrutiny Committee note the prudential indicators for treasury management in Appendix B.

3.0 Contribution to Borough Plan Priorities and Strategic Context

- 3.1 This Quarter 3 Financial Forecast sets out clearly the scale of the financial challenge facing the Council and the difficult context in which decisions continue to be taken. Like all local authorities across the country, Brent is managing sustained pressure from rising demand, high inflation, elevated interest rates and increasing complexity in statutory services. The General Fund is forecasting an overspend of £12.5 million, with the most significant pressures concentrated in housing and temporary accommodation, Adult Social Care, and Children and Young People's Services, where the Council has limited discretion and must respond to need as it presents.
- 3.2 These pressures are real and material. Temporary accommodation costs continue to rise as demand increases and housing supply remains constrained. Adult Social Care and Children's Services are experiencing higher than anticipated volumes and complexity, alongside sharp increases in placement and care package costs. Small changes in demand are translating into very large financial impacts, and the operating environment remains volatile.
- 3.3 Against this backdrop, it is important to recognise the Council's continued grip, resilience and ability to respond. Spending controls remain firmly in place and have been strengthened further during the year. The introduction of enhanced assurance, vacancy management and tighter controls on non-

essential spend has helped stabilise the in year position and avoid far more severe outcomes, at a time when a growing number of councils nationally are requiring exceptional financial support.

- 3.4 There are also clear positives in this forecast. The capital programme continues to support delivery of homes, regeneration and infrastructure that will improve outcomes for residents and reduce longer term pressure on revenue budgets. Over £326 million of capital investment is forecast this year, including significant progress on new council homes, regeneration schemes and public realm improvements. Nearly 900 new homes are expected to be added to the Council's housing portfolio over 2025 and 2026, helping to reduce reliance on expensive temporary accommodation over time
- 3.5 The Council has also secured £1.5 million through the Pride in Place Impact Fund, supporting visible improvements to public spaces, parks and high streets. This funding reflects our belief that even in a constrained financial environment, investing in neighbourhood pride, cleaner streets, safer parks and thriving town centres matters to residents and to the long-term health of the borough.
- 3.6 Alongside this, there are emerging positives in the medium-term outlook. The Government has confirmed a multiyear funding settlement from 2026/27, updated deprivation measures that better reflect housing costs, and reforms to local government finance that are expected to improve the alignment between need and funding. While uncertainty remains, this greater clarity provides a stronger foundation for future planning.
- 3.7 We are therefore walking a tightrope. On one side is our ambition to make our vision for Brent real, to invest in homes, places and communities, and to continue making the borough better. On the other hand, it is the unavoidable responsibility to fund statutory services, protect the most vulnerable residents and maintain financial control. This report demonstrates how the Council is holding that balance with discipline, realism and purpose in one of the most challenging periods local councils have ever faced.

4.0 Revenue Detail

Service Reform and Strategy

Table 5: 2025/26 Quarter 3 forecast for Service Reform and Strategy

Service Reform and Strategy	Budget (£m)	Forecast (£m)	Overspend / (Underspend) (£m)
Adult Social Care	123.7	132.4	8.7
Strategic Commissioning & Capacity Building	16.7	16.4	(0.3)

Public Health	26.2	26.2	0.0
Leisure	1.8	2.1	0.3
Integrated Care Partnerships	0.2	0.2	0.0
Communications Insight and Innovation	12.8	12.5	(0.3)
Change Programme	0.7	0.5	(0.3)
Total	182.1	190.3	8.1

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 budget of £10.9m to account for assumptions around demographic changes and inflation on contracts and care packages.
- 4.2 The Directorate is forecast to overspend by £8.1m at Quarter 3. A number of financial pressures have arisen since the £2.1m overspend was reported in Quarter 2.
- 4.3 The £2.1m overspend reported at Q2 assumed that savings attributed to placement budgets (£4.3m) would be fully achieved. There have been significant challenges in meeting this target, where £2.5m of savings are at risk (£1.3m unachievable and £1.2m slippage).
- 4.4 Within the Q2 forecast, £0.8m was assumed to be achieved through the deployment of a costing tool intended to aid with open and transparent re-negotiation of placement costs. There was an assumption that the cost of some care packages would reduce as a result of this deployment. As the year has progressed, it has become apparent that the price that the Council has negotiated is already competitive and therefore no further savings can be achieved in this area.
- 4.5 The previous forecast also assumed £0.2m of income will be generated through charging for Telecare services. The full year savings target for this is £0.5m. However, initial analysis has shown that this will not bring in the income that was initially assumed. Whilst charging has not commenced, £0.1m savings have been achieved through the reduction of clients from 3,700 to 2,750.
- 4.6 In addition to challenges in delivering the savings, there have been pressures arising from the cost of placements. Growth of £10.9m was applied to the placements budget for 2025/26, which limited the uplifts that could be provided on existing packages. New placements are being priced at a value that far exceeds the current packages with some feedback from providers that this is to compensate for low uplifts. As the Council spot purchases residential and nursing placements, the providers have more power to

charge at higher rates. In addition, recent increases in National Insurance, London Living Wage and the cost of new placements, have significantly increased the pressure on the social care placements. Care Analytics had estimated a £20m growth pressure when modelling National Insurance, demographics and inflation last year.

- 4.7 Supported Living care packages are showing a significant pressure of £7.8m, as the average cost per week is 20% more than previously modelled for inflation. This is due to clients requiring one to one or two to one care and having greater, complex needs.
- 4.8 Nursing Care Placement Packages show a pressure of £4.6m. There are 15 less clients than what had been anticipated. However, the cost has risen substantially. The average cost across nursing placements is 27% higher than modelled at the time of budget setting. Nursing Dementia is showing a 46% increase on average cost compared to previous assumptions.
- 4.9 Residential Placements contribute £2.6m to the overspend. There are 20 more clients, costing on average 27% more than last year, than had previously been anticipated.
- 4.10 Homecare shows a pressure of £3.7m. Since November 2024, homecare hours have increased by 3.8%.
- 4.11 A number of actions have been taken to manage the current pressures, which are set out below.
- Reviewing short-term placements that do not have a committed end date and ensuring all new short-term placements have an end date and are reviewed within eight weeks. Short term placements are defined as packages that are up to eight weeks and are generally more expensive than long term placements. Reviewing these short-term placements will reduce costs, either by re-purchasing on a long-term basis where appropriate or by ending the package of care where it is no longer needed. Client contributions can also be obtained from clients in long-term care, where financial assessed as needing to contribute to their care, but not from clients receiving short term care.
 - Reviewing the top ten highest cost care packages in each type of care. This will be reviewed to assess whether they are eligible for continuing health care and therefore funding should be received by the NHS. This review also serves as a data quality check to ensure that packages of care are recorded correctly in Mosaic (Adult Social Care's case management system) as focusing on the largest packages of care will bring the highest financial benefit if they are recorded correctly.

- Reviewing cases where clients are receiving a Nursing care placement but there is no recorded contribution from the NHS for Funded Nursing Care. Funded Nursing Care is an agreement with the NHS whereby the Nursing element of a Nursing Care placement is paid for by the NHS, for which the standard rate is £254.06 per week.
 - Analysing Mental Health placements to review whether additional income can be received from the NHS as part of the Section 117 agreement. Section 117 joint funding refers to the duty shared by the NHS and local authorities to jointly fund and provide free aftercare services for individuals who have been receiving care under specific sections of the Mental Health Act 1983 and are leaving hospital.
 - Ensuring any funding allocated via Direct Payment but not being utilised is recouped from accounts to help reduce the overspend position currently forecast.
 - Continue to strengthen the role of the Quality Assurance Management panel, which is a panel set up to review new packages and uplifts to existing packages, that has helped to reduce the number of packages and has generated £2.4m of cost avoidance.
 - More focussed approach on providers where we are seeing disproportionate requests for additional support beyond core offer, to understand the reasons why and ensuring the most cost effective model to support residents are in place.
- 4.12 In light of the significant increase in the forecast overspend, accountability meetings have now been set up to track mitigations and actions so the overspend can be minimised as much as possible. It is anticipated that if the actions above are addressed, the forecast overspend could reduce by £0.5m, to £7.6m.
- 4.13 The Strategic Commissioning and Capacity Building directorate is forecast to underspend by £0.3m. Whilst the department is forecast to underspend, 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. It is very unlikely that any savings will materialise this year. 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. It is anticipated that £0.5m will

be made in 2026/7 by working closely with Housing on alternative delivery models and recommissioning of contracts.

Risks and uncertainties

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

- 4.14 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.
- 4.15 Recruitment and retention of staff remain one of the most significant risks nationally within the social care sector. High turnover and vacancy rates continue to impact service delivery, placing additional strain on existing teams and creating challenges in maintaining continuity of care for vulnerable adults. Locally, the quality of applicants for adult social care roles has been a persistent issue. To address this, we have adopted a targeted recruitment approach. Over the past eight months, this strategy has delivered tangible results:
- 17 agency staff successfully converted to permanent roles, with three currently completing onboarding.
 - A focused campaign through a recruitment agency to recruit 25 social workers, we have recruited twenty-five social workers through this process, and the contract has now ended.
- 4.16 Despite these successes, recruitment remains challenging. This reflects the wider national shortage of qualified care workers, which has fundamentally altered the workforce model across social care. As a result, there is an increased reliance on agency staff, which is significantly more costly than permanent appointments. While management is prioritising agency-to-permanent conversions to stabilise the workforce and reduce costs, some posts cannot be made permanent due to their funding source. A significant proportion of agency roles are funded by the Better Care Fund, and others by the Market Sustainability and Improvement Fund (MSIF) – both of which are temporary funding streams. Consequently, these posts cannot be converted to permanent positions at present.
- 4.17 As part of the long-term strategy, investment in developing talent internally is a priority. This year, the service have recruited 10 apprentices, who are currently progressing through their training. In addition, there are 8 Assessed and Supported Year in Employment (ASYE) social workers, and a significant number are already embedded within the service. Once qualified, these individuals will transition into permanent social work posts, strengthening the workforce and reducing reliance on external recruitment. Overarching strategy remains clear:

- Target permanent recruitment for all posts where possible.
 - Retain high-performing agency staff to safeguard service quality.
 - Continue agency-to-permanent conversions as a priority, alongside proactive recruitment campaigns.
 - Grow our own talent pipeline through apprenticeships and ASYE placements.
- 4.18 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

- 4.19 As of Q3, the Public Health grant is forecast to break even, unchanged from the Q2 forecast, 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.
- 4.20 The public health grant amounts for the next three years were published on 17 December 2025, as part of the Provisional Local Government Financial Settlement. There is an increase in the grant from £26,219,135 in 25/26 to £28,541,794 for Brent. In addition, the Drug and Alcohol Treatment and Recovery Improvement Grant, Individual Placement and Support Grant, the Local Stop Smoking Services and Support Grant, and the Swap to Stop scheme are continuing but as part of the core Public Health Grant. The public health grant remains ring-fenced with clear criteria determining its use.
- 4.21 Spend against ring-fenced Public Health grants, including the Drug and Alcohol Treatment Recovery and Improvement Grant (DATRIG), the Stop Smoking Grant and the Start for Life programme, remains on track and in line with national requirements. These grants continue to underpin targeted interventions and local population health initiatives. The position will be monitored closely given ongoing contractual inflation and demand pressures across commissioned services.

Leisure

- 4.22 Bridge Park Community Leisure Centre officially closed on 31 July 2025, following an extended period of community consultation. A £0.3m overspend has resulted from part-year running costs, unchanged from the Q2 forecast.

Communications, Insight and Innovation

- 4.23 The Communications, Insight and Innovation service, which includes Change and Customer Insight, Communications, Digital Strategy and ICT, is forecasting an underspend of £0.3m at Q3, representing an improvement from the breakeven position reported at Q2. The favorable movement reflects staffing underspends, proactive budget management and income overperformance.
- 4.24 The Change Programme is also forecasting an underspend of £0.3m, driven by reduced expenditure on corporate training and development.

Savings

- 4.25 The directorate has £4.7m of savings to deliver in 2025/26, of which £1.583m has been flagged as at risk. Savings at risk include Technology Enabled Care (£0.35m), a review of housing related support contracts (£0.5m), implementation of Telecare Service Charging (£0.5m) and managing demand at the front door, prevention and early intervention (£0.23).
- 4.26 As a result of the enhanced spending controls, the directorate has focused on holding vacancies where possible and continuing to reduce reliance on agency staff. In the last eight months, there have been seventeen staff conversions from agency to permanent, equating to approximately £0.2m of full year cost avoidance.

Summary of Key Assumptions

- 4.27 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	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	The Council is working closely with the service providers and provides robust challenge of individual package costs based on

with what was modelled		than what was anticipated	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 3 forecast for Children, Young People and Community Development

CYPCD - General Fund	Budget	Forecast	Overspend / (Underspend)
	(£m)	(£m)	(£m)
Central Management	4.1	2.1	(2.0)
Community Safety and Prevent	1.8	1.9	0.1
Communities and Partnerships	0.2	0.3	0.1
Employment Skills and Enterprise	(0.4)	(0.1)	0.3
Early Help	4.7	4.7	0
Looked After Children (LAC) and Permanency	6.6	6.7	0.1
Children With Disabilities	14.8	14.6	(0.2)

Safeguarding & Quality Assurance	2.2	2.1	(0.1)
Family Support & Child Protection	9.5	9.9	0.4
Forward Planning Performance and Partnerships	50	52.3	2.3
Inclusion	3.2	4.0	0.8
Setting and School Effectiveness	0	0.3	0.3
Virtual School	0.5	0.5	0.0
TOTAL	97.2	99.3	2.1

Summary

- 5.1 The CYPCD directorate is reporting on a Q3 financial forecast position of £2.1m. This represents a £0.1m decrease from the Q2 reported position of £2.2m. The overall pressure is largely due to the cost of placing children in residential care with a significant increase seen in the past few months.

Placement pressures

- 5.2 The residential and secure placement budgets held within the FPPP service area continue to experience significant pressures totaling £3.9m. This projected overspend is being partially mitigated by projected underspend in other areas, including foster care and adoption, along with reduced costs of placements in supported accommodation, and additional income and contributions, resulting in a net projected overspend of £2.1m.
- 5.3 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 increased to seven as of mid-September as reported in Quarter 2. These were not anticipated at the time of the budget setting. 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. The estimated cost of the secure placements is £1.3m.
- 5.4 While the number of LAC declined in the last year, there has been a sharp rise in children and young people entering care with complex needs, particularly since the end of spring 2025. This is reflected in the increase in residential placements with an average of 45 children in residential care in October 2025 – 15 more than the previous year. In addition, the average cost

of residential placements has increased. Despite this, 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. As of October, there were 307 LAC children in Brent. Identifying residential children's home placements can be very challenging despite comprehensive nationwide searches using both the Commissioning Alliance's direct purchasing vehicle framework as well as spot purchase providers. This means the local authority has limited negotiating power in relation to initial costs.

- 5.5 The FPPP Service has implemented measures to manage down placement costs including renegotiating costs as much as possible. 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.
- 5.6 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.
- 5.7 In addition to the above, 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 shortage of housing in the borough means, however, that care leavers cannot access permanent accommodation in line with their independence plans which is impacting on progress to reduce the cost of semi-independent accommodation.
- 5.8 Actions taken to increase foster care provision include increasing allowance rates to the West London average, development of the Mockingbird programme, the use of 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.
- 5.9 Lastly, work continues with other West London authorities to improve sufficiency of a residential home run by local authorities, 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

- 5.10 The Community Development area is forecasting an overall overspend of £0.5m, which includes a reported pressure of £0.3m against the budgets held for Employment Skills and Enterprise. This pressure has mainly arisen from a reduction in the Adults Skills Fund (ASF) grant funding from the Department for Education. There is an ongoing review to identify mitigations, including seeking additional external grant funding and managing spend.
- 5.11 LAC and Permanency's latest forecast is an overspend of £0.1m from legal fees and costs linked to the Contact team. There is no dedicated budget for legal costs and pressures in the Contact team have been partially mitigated by underspends in the client subsistence budgets and other miscellaneous budgets.
- 5.12 The CWD area is forecasting a net overspend of £0.2m. There are pressures of £0.4m mainly due to new clients requiring residential support and increased placement costs partially mitigated by a £0.2m underspend in salaries (vacant positions held in year) and reduced spending on client subsistence.
- 5.13 The Family Support and Child Protection service is currently reporting an overspend of £0.4m primarily stemming from the Multi Agency Safeguarding Hub (MASH) budget which reports an overspend of £0.3m, mainly attributable to staffing pressures including recruitment and retention costs. This pressure is expected to be mitigated by underspends against the wider social care budgets.
- 5.14 Inclusion is set to overspend by £0.8m. Staffing budget pressures in the Educational Psychology and 0-25 SENAS teams are driving an overspend of £0.6m as meeting statutory deadlines for Special Educational Needs assessments has required reliance on agency staff, who are more costly than permanent employees due to recruitment challenges. The forecast pressure for this area also includes £0.2m of undelivered savings against the reduction in contract for targeted services. The pressure in the area will be mitigated by forecast underspends within the central budgets held by the directorate.
- 5.15 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.

5.16 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. Examples of additional management actions by the directorate that have led to spend controls or cost avoidance in the last three months are:

- Agency worker spend continues to be scrutinised including ensuring that annual leave is taken before any extension is approved. Agency to permanent conversions continue to be progressed. There is an ongoing recruitment drive for permanent social workers and alongside that a recruitment programme for newly qualified social workers, that attract external funding.
- All requests for residential placements are approved by the Director Early Help and Social Care as a new control that has been introduced to ensure that all other options have been considered. In addition, the Residential Panel is now co-chaired by the Director of Education, Partnerships and Strategy and the Director of Early Help and Social Care to ensure focus on appropriate and timely step-down arrangements.
- Scrutiny of School Transport expenditure has increased through greater controls on decision-making through management tiers. The aim is to undertake targeted work in the new financial year in relation to eligibility for SEND transport for the 16-25 cohort.
- The directorate is also taking stock of licences and related contracts to understand whether cheaper alternatives can be procured.

Risks and Uncertainties

5.17 The persistent overspend on high-cost residential and secure placements poses a major financial risk. While mitigations 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.

5.18 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.

5.19 A recent restructuring has not fully mitigated the impact of the staffing pressures within the Employment and Skills service area. The 2024/25 academic year is the final year in which the GLA will fund delivery that

exceeds 100% of the contracted allocation. From the 2025/26 academic year onward, any over-delivery of learning hours or outcomes will not be reimbursed, potentially resulting in unfunded delivery costs for the service.

- 5.20 Expenditure relating to ongoing judicial review cases and significant legal disbursements associated with age assessments for UASC. This remains a key risk, particularly with the arrival of eight new UASC in September 2025.
- 5.21 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 is 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.
- 5.22 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 was 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

- 5.23 The directorate has £2m in 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.
- 5.24 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 MTFS 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 812 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.	<p>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.</p> <p>Supporting the transition of care leavers to their own tenancies, to improve outcomes and independence.</p> <p>Innovative support and partnering with Health for CYP Mental Health and Wellbeing, among other preventative measures.</p>
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	If increases of 15% during	There would be a reduction in	Continued management action to

in the Localities and LAC & Permanency service to include the use of agency staff at a similar level than 2024/25.	the year, there could be up to £0.4m additional spend on agency social work staff to manage the pressure.	the use of agency staff and the reduced caseloads could be attractive to social workers seeking permanent roles.	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 3 forecast for Neighbourhoods and Regeneration

Neighbourhoods and Regeneration	Budget (£m)	Forecast (£m)	Overspend / (Underspend) (£m)
Public Realm	21.2	19.4	(1.8)
Inclusive Regeneration & Climate Action	2.3	2.3	0.0
Property & Assets	8.3	8.1	(0.2)
Total	31.8	29.8	(2.0)

Summary

- 6.1 Neighbourhoods and Regeneration Directorate are currently forecasting a £2.0m underspend at Quarter 3. The breakdown of this underspend is noted below, with the impact of the spending controls noted in section 6.19.
- 6.2 Within Public Realm, the Parking service are forecasting a £2.5m overachievement of income based on PCN issuance and current performance levels. This position is partially offset within the Directorate,

mainly by a £0.7m pressure in Waste, and other smaller pressures across the department. This leaves a £1.8m underspend position overall for Public Realm.

- 6.3 Property & Assets are forecasting a £0.2m underspend which comes from a £0.5m underspend within the Energy team, partially offset by a £0.4m pressure within Commercial Property.

Risks and uncertainties

- 6.4 Inclusive Regeneration & Climate Action continues to face income challenges within Building Control and Planning services.
- 6.5 Building Control's revenue generation has been impacted by a slowdown in major development appointments, largely driven by delays and cancellations linked to wider economic conditions. The introduction of new high-rise building regulations by the Health and Safety Executive (HSE) in October 2023 has also shifted the charging structure to a cost-recovery basis, reducing potential fee income. Furthermore, the Building Safety Regulator (BSR) now allocates most large-scale projects directly to Local Authorities, limiting opportunities for competitive bidding. Persistent staffing shortages add further pressure, restricting the team's ability to secure additional work.
- 6.6 The department is exploring mitigation strategies, and engagement sessions have been held with the Building Control team. In addition, a meeting with the Recruitment Team has taken place to progress a targeted campaign aimed at filling vacant posts and strengthening market position.
- 6.7 Planning and Development services are experiencing similar trends, with application and pre-application fee income declining in recent years due to the challenging financial climate. However, the revised fee structure for 2025/26 is expected to provide sufficient resilience to prevent financial pressures within the service during the year. In the future years, a fee increase is anticipated, and income generated by the Land Charges team is projected to provide sustainable financial support to the Planning and Development service.
- 6.8 Within Public Realm, Service Development & Contracts Performance Team are due to overspend by £0.7m 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 continue, including a promotional piece in the Brent magazine, and further roll out of food waste collection to flats and communal properties hope to continue the trend of increased food waste tonnages.

- 6.9 A programme to retrofit recycling bins at communal blocks of flats is now also underway, and that focus through this will be to further improve recycling rates at these difficult to serve properties. Work is also ongoing in terms of managing behaviours and participation with respect to the blue sack service. This past quarter has seen the highest volume return of materials collected through this system, with an increase of approximate 60 tonnes of paper and card collected compared to previous quarter but the most important point to note is that contamination of blue sack tonnage is minimal at 9.2 tonnes compared to last year being 25 tonnes. By way of example, every tonne of food waste recycled saves £133 per tonne, every tonne of paper and card saves £85 per tonne, and every tonne of Mixed Recycling diverted saves £81 per tonne. This means the 1,345 tonne increase in paper and card recycling over the last 12 months has saved approximately £115k.
- 6.10 Messaging around recycling and reducing household general waste is ongoing. Across Q1&2 disposal costs have been over £350k less than was estimated ahead of the start of the year, and it is hoped this trend will continue. 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. Work is ongoing to draw up a plan on how the funds could be utilised to boost our recycling rates and reduce our spend.
- 6.11 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, and this usage is reflected in the above forecast.
- 6.12 The improved position forecast reported by Healthy Streets and Parking Service is a result of a comprehensive review of income collected. The service regularly review the enforcement plan to ensure that locations and resources are optimally aligned for effective deployment. This includes the installation of new CCTV cameras as part of the School Streets expansion, the relocation of cameras from areas where compliance has improved, and the introduction of CCTV enforcement at yellow box junctions where it was not previously in place. There has also been an increase in parking contraventions during major events, prompting an enhanced event-day deployment strategy alongside a higher number of events this year. Additionally, late-night deployments in hotspot areas, particularly around Kingsbury, and improved deployment plans in areas with low compliance have further contributed to the uplift.
- 6.13 An underspend of £0.3m is forecast from Regulatory Services which has been generated from additional license fees and Pest Control income. An expansion of the pest control service with new contracts in place has allowed the service to generate additional income in 2025/26.
- 6.14 To achieve income targets, Commercial Property must continue attracting tenants to replace expired leases and fill vacant spaces. At present, the

service is reporting an overspend of £0.4m. This decrease from Q2 is primarily driven by anticipated additional rental income and the expiry of rent-free periods. To continue to mitigate this, active marketing of available properties is underway, supported by collaboration with agents where necessary. Facilities Management remains under cost pressure, particularly from overtime in Cleaning and Security services, leading to a forecast overspend of £0.1m. Actions are being taken to manage these pressures, and any savings within Property & Assets will help offset the impact.

- 6.15 Current forecasts from the Council's energy supplier, based on secured contracts for future supply, indicate energy costs will fall in 2025/26. The latest estimate suggests an underspend of £0.5m within the Energy budget, which will help reduce the anticipated overspend in Facilities Management and Commercial Services. LASER purchases energy in advance through annual tranches starting each October, with monthly updates on procurement progress and price forecasts. Approximately 50% of next year's electricity and gas has already been secured, and current projections indicate a slight reduction in prices compared to this year. Therefore, a similar position is expected for the next financial year.

Savings

- 6.16 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.
- 6.17 At Quarter 3 the department is currently expecting that all savings will be delivered in-year.
- 6.18 In light of the serious financial challenge that the Council is facing, the Directorate has been monitoring the impact of spending controls that have been implemented.
- Public Realm are holding vacancies in Regulatory Services and Neighbourhood Management, overtime is being restricted to only those areas that support income generation particularly parking enforcement income processing and pest control, and also events where the costs are recharged. Spend is being scrutinised more generally to ensure contractual spend is being challenged and non-essential spend is stopped. In order to offset some of these continued pressures, the Public Realm NCIL programme has been a focus. This involves a number of well-resourced projects thus relieving pressures on revenue budgets.
 - Within Property & Assets, there are no agency staff employed in the service as at the end of November 2025. The Property & Assets has also continued to look for all opportunities to claim external grants and has recently secured up to £7.3m of GLA safeguarding funding for the

Clock Cottage and Watling Gardens new-build affordable housing schemes to reduce the demand on the Council’s capital borrowing.

- Inclusive Regeneration and Climate Action have continued to hold a number of posts vacant to maintain revenue savings. Other measures include reviewing subscriptions and contracts as they come up for renewal which have also resulted in some small savings.

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 24/25 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. A targeted recruitment plan is due to commence aimed at filling vacant posts and strengthening the market position.
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 when	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 used and is	The monthly data around tonnage, rejections and market prices for recycling are closely monitored. With ongoing work to improve recycling performance with targeted initiatives to reduce contamination levels in recycling

	modelling the cost of the recycle reprocessing budget.	available to repurpose and utilise for other pressures.	collection. In addition, there are education and campaigns around food recycling.
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 3 forecast for Finance and Resources

Finance and Resources	Budget (£m)	Forecast (£m)	Overspend / (Underspend) (£m)
Finance Services	11.8	11.8	0.0
Organisational Assurance & Resilience	4.7	4.7	0.0
Shared Technology Services	0.0	0.0	0.0
Human Resources & Organisational Development	4.3	4.2	(0.1)
Legal Services	5.6	5.5	(0.1)
Democratic Services	6.3	6.3	0.0
Total	32.7	32.5	(0.2)

Summary

- 7.1 The Finance & Resources directorate is reporting a £0.2m underspend at Q3. This is an improved position from the Q2 breakeven forecast.
- 7.2 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.
- 7.3 Legal Services is reporting an underspend of £0.1m, primarily due to a reduction in the number of complex children's cases, leading to a reduction in expenditure on legal fees. The service has also benefited from the receipt of a settlement from an historical criminal case.

- 7.4 As part of the spending controls implemented by the department, the Legal team has successfully recruited to several positions previously covered by agency staff, and where possible, has also held a number of vacancies.
- 7.5 As a result of changes to the Legal structure, Chief Lawyers are closely reviewing and monitoring all income and expenditure within their individual teams. Any external legal work assigned to third parties is subject to scrutiny to ensure that internal expertise is not overlooked and that value for money is achieved. These measures have helped reduce overall costs within the Legal service.
- 7.6 The Human Resources & Organisational Development service is reporting an underspend of £0.1m. This is largely due to a review of the service structure, and the implementation of spending controls to scrutinise spend in the service.
- 7.7 Democratic Services is reporting a breakeven position at Q3. The Chief Executive's Office is reporting an underspend following a review of postage arrangements. However, this is offset by a forecast overspend in the Complaints Service due to an increase in the number of complaints, which has required additional staffing support.

Savings

- 7.8 A total of £0.7m in savings was planned for Finance and Resources through staff reductions, service transformation, and income generation.
- 7.9 At Q3 all saving are expected to be achieved in 2025/26.

Risks & Uncertainties

- 7.10 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.
- 7.11 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 3 forecast for Residents and Housing Services

Residents and Housing Services	Budget (£m)	Forecast (£m)	Overspend / (Underspend) (£m)
Housing Needs and Support	14.0	18.5	4.5
Quality Assurance and Resident Experience Service	2.6	2.6	0.0
Private Housing Services	0.2	0.2	0.0
Residents Services	15.8	15.8	0.0
Housing and Resident Services Corporate Director	0.3	0.3	0.0
Total	32.9	37.4	4.5

Summary

- 8.1 The Residents and Housing Service department is currently forecasting a possible £4.5m 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. This forecast represents a £500k improvement compared to the previous quarter, fully attributable to a top up of the Homelessness Prevention Grant that was unexpectedly announced in December 2025.
- 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 £4.5m overspend. Whilst there are improvements, the costs continue to grow, the average net cost of a household in Stage 1 accommodation has increased further from £15k to £17k in comparison to Quarter 2 and the total number of people in temporary accommodation continues to increase.
- 8.3 The service is implementing several proactive interventions and projects aimed at increasing supply and identifying alternative arrangements for clients currently in the most expensive placements, in order to help mitigate financial pressures. However, it is important to note that the overall

budgetary pressure from homelessness may not be significantly reduced by these potential savings, as they are not immediately cashable and must be considered against the backdrop of ongoing pressures and sustained demand for the service.

Demand

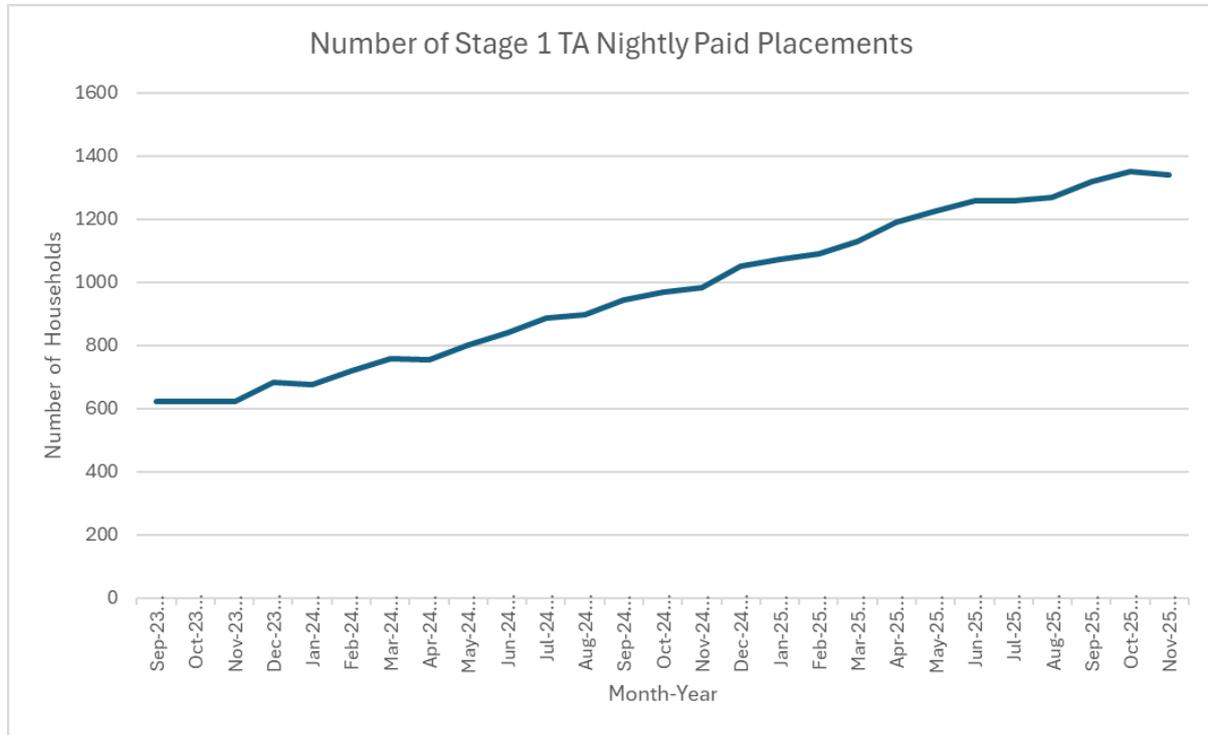
Cost per Night (£)*	Number of Households as @13/04/2025	Number of Households as @03/09/2025	Number of Households as @28/11/2025	% change (Apr-Nov)	% change (Sep-Nov)
300	0	0	0	n/a	n/a
250	0	0	0	n/a	n/a
225	0	0	0	n/a	n/a
180 - 200	0	0	0	n/a	n/a
150 - 175	64	52	28	-56%	-46%
100 - 149	168	206	184	+10%	-11%
70-99	205	304	411	+100%	+35%
50-69	403	417	431	+7%	+3%
35-49	265	228	204	-23%	-11%
<35	77	73	59	-23%	-19%
Total	1,182	1,280	1,317	+11%	+3%

**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.*

8.4 As illustrated above, the total number of households in nightly paid accommodation in the last week of November was 1,317, a 3% increase in comparison to the beginning of September and an 11% increase from April. Officers have ensured all households have been decanted from the most expensive £180 to £300 per night rooms and there has been a 46% 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 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 nightly paid accommodation, wherever possible.

8.5 There has been an overall increase of 11% (135 Households) in the use of nightly paid 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 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.



8.6 The Council is expecting 892 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. So far this year, of the 265 social housing allocations made to homeless households from the properties at Clearwater, Aneurin Bevan Court, and Fulton Road, 162 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 103 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 £4.8m could be achieved on stage 1 accommodation as a result, a £1.5m part-year saving for 2025/26.

8.7 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 £1.9m 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.

- 8.8 In addition, 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.

New Supply of Temporary Accommodation & PRS

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

Acquisitions

- 8.10 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 7 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.

- 8.11 While 29 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 nightly paid 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

- 8.12 Various leasing options continue to be assessed to secure cost-effective nightly paid placements. However, negotiations, assessments and evaluations require time. There are a number of options currently under consideration, however a sizeable impact is not anticipated to be achieved in the current financial year and is forecast to be more prominent in 2026/27.

A lease deal with the Igar Hotel to provide 40 units (an increase of 5 units plus securing preferential cost) has now been completed. A number of other lease proposals are currently being considered. To help accelerate progress and strengthen commercial negotiations, Greenlight Commercial & Consulting have been engaged to support this workstream with a number of lease proposals in review. Greenlight also work to decant the top 100 most expensive nightly paid placements to cheaper accommodation. To date 33 moves have been achieved, achieving a cost reduction of circa £1,413 per night.

Private Rented Sector Acquisitions - I4B Holdings Ltd

- 8.13 I4B Holdings Ltd 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 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 £6m per annum on stage 1 accommodation costs.

Risks and uncertainties

- 8.14 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. In 2024/25, the demand for homeless support services in Brent was for 7,285 households, comprising of 4,178 single individuals and 3,107 families. In 2025/26 the demand in Brent is currently for 6464 households, 3,937 single and 2,527 families. On average, this equates to approximately 170 new applications being submitted each week, underscoring the ongoing pressure on local homelessness services. This level of demand reflects a 21% increase compared to the 140 weekly applications recorded during the 2024/25 period, highlighting the need for housing support as associated costs remain elevated. The total number of applications in 2025/26 is projected to reach approximately 8,840. 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 Renters' Rights Act 2025 has now become law and whilst it is anticipated that some landlords will exit the private rented sector market, resulting in a possible increase of homeless applications, it is anticipated the new legislation will have an overall positive impact on homelessness demand. This is because the ban on Section 21 'no fault' evictions in the private rented sector, scheduled to be implemented on 1 May 2026 means that all new possession claims will

have to proceed under Section 8 instead. Landlords will be able to serve a Section 8 notice for reasons such as rent arrears, anti-social behaviour, selling the property or where a close family member needs to move back in. However, there will need to be clear evidence to support the grounds, and the claim can still be contested by the tenant.

- 8.15 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%. New research estimates a £740m temporary accommodation shortfall across London, equivalent to £202 per household. The equivalent of 11% of the average household's council tax bill is now spent on temporary accommodation - equal to one in every nine council tax pounds spent. Further analysis shows boroughs now spending £5.5 million a day on homelessness.
- 8.16 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.
- 8.17 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.
- 8.18 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 November 2025 average private rents across the UK increased by 5% in the 12 months. In London, rent inflation rose by 4.3%, with the average monthly rent in Brent reaching £1.9k.

- 8.19 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.
- 8.20 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.
- 8.21 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, the forecast overspend for 2025/26 is £2.1m.

- 8.22 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

- 8.23 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.
- 8.24 In September 2025, the Council implemented enhanced spend controls to meet the financial challenges. Since then, 3 members of the Homelessness Services team have been replaced with permanent employees. Resident Services are in the process of converting 5 agency staff within the contact centre to permanent appointments. A number of vacancies are also being held across all services except where the role has a significant impact on statutory services or contributes to income collection, debt reduction or income generation. In addition, services are stopping all overtime and scrutinising any overtime requests. Overtime is only being used where there

is a clear and compelling business case. Registration and Cemeteries have cancelled staff where possible working extra days as part time additional hours or weekend overwork where services not taken up by public.

8.25 Resident Services also postponed investment in the next stage of the culture strategy whilst the scope, costs and likely outputs are being reviewed. Registration Brochure renewal stopped saving circa £8k. Museum and culture teams routinely seek external funding to support additional activity in Brent. In October, Brent Museum and Archives was awarded a grant of £122k from Department for Culture, Media and Sport through Arts Council England’s Museum Renewal Fund to improve museum collections. The team, working with Public Health, have also secured a £750k Arts Council England grant for a three-year programme aiming to increase arts engagement and improve health outcomes in Brent, with a particular focus on Black and Asian communities, people with SEND, and those experiencing health inequalities. Registration have offered the blossom suite an additional day per week through October and November to generate additional income. As a result of Central Middlesex Hospital closing their onsite mortuary, the Funeral Service has been able to generate a modest income through transfers to Ealing or Northwick Park.

8.26 Furthermore, Accommodation Services introduced a firmer approach to allocating compensations following complaints, including the option to direct all or part of compensation payments toward rent arrears where appropriate. The service are introducing new appraisal tools to strengthen accountability and maximise cost avoidance opportunities.

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 £326 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 £326 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 £0.3m per quarter	A 5% improvement in the collection rate will recover £0.3m 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 £1.2m per annum	A 3% cost reduction in costs would result in a circa £1.2m 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 30 November 2025 is £240.9m. As at the end of November 2025, the amount collected was 67.4%, which is 0.2% higher than the amount collected in the same period in 2024/25, and 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 as at 30 Nov 2025 for those on CTS of working age is 55.1%, with 76% having made a payment towards their 2025/26 council tax bill. 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 30 Nov 2025, 1,659 applications have been received for support from this fund and 202 (12%) have been approved. The dispatch of recovery notices have generated more applications in this area. It should also be noted that assessments have been completed in an average of 9 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 collectible amount for NNDR as at 30 November 2025 is £148.2m, an increase of £1.7m from the reported in Quarter 2. 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 collectible 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 30 November 2025, the amount collected for NNDR was 69.43%, which is an increase by 1.64% with the amount collected in the same period in 2024/25 (67.79%). 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 30 November 2025, the collection is 0.73% up against 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.

Savings

- 9.18 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 3, 81% of these are on track to be fully delivered (81% at quarter 2), which equates to delivering £7.2m of the £8.9m budgeted savings required. Since quarter 2, the number of savings which are not on target to be fully delivered has increased to 4, up 1 since Q2.

Virements

- 9.19 Table 14 shows the virements and adjustments which have been entered to adjust the budgets at Corporate Directorate level between 31 July 2025 and 31 October 2025.

Table 14: Virements and adjustments in 2025/26 budget between 31.07.2025 and 31.10.2025

	2025/26 In-Year Budget at 31.07.2025	In-year growth	Transfer of functions between services	Technical Adjustments	2025/26 In-Year Budget at 31.10.2025
	£m	£m	£m	£m	£m
Service Reform and Strategy	181.5	0.1	(0.4)	0.9	182.1
Children, Young People and Community Development	96.0	1.1	0.0	0.1	97.2
Neighbourhoods and Regeneration	35.4	0.0	0.0	(3.6)	31.8
Finance and Resources	31.7	0.4	0.1	0.6	32.7
Residents and Housing Services	31.1	0.3	0.3	1.2	32.9
Capital Financing	38.4	0.0	0.0	0.2	38.6
Central Budgets	17.3	(1.9)	0.0	0.7	16.1
Core Funding	(431.4)	0.0	0.0	0.0	(431.4)
Total Budget	0.0	0.0	0.0	0.0	0.0

9.20 Since the Q2 report, Central Items (£375.7m at 31.07.2025) has been split into three sections for increased transparency of the budgets in Central Items:

- Capital Financing (£38.4m at 31.07.2025) is the budget for the costs of financing the Capital Programme.
- Core Funding (£431.4m) is the income budget representing the funding for the net revenue budget per Appendix A to the Budget and Council Tax report approved by Full Council in February 2025. This includes Council Tax, Business Rates, Revenue Support Grant and specific Government grants.
- Central Budgets (£17.3m at 31.07.2025) is the remaining income and expenditure budgets not attributable to specific service directorates.

9.21 In-year growth items are budget movements from the Central budgets 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 August to October 2025:

- Permanent funding to reduce an income budget in the Service Reform and Strategy directorate (£0.1m)
- Permanent funding for historic pressures (£0.8m) and business case investment (£0.3m) on SEND transport in the Children, Young People and Community Development directorate
- Permanent and temporary funding for salaries in the Finance and Resources and Residents and Housing Services directorates (£0.5m)
- Temporary funding for the NEC resilience contract in the Residents and Housing Services directorate (£0.2m)

9.22 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 August to October 2025:

- Transfer of Resident Data Team salary budget from the Service Reform and Strategy directorate to Residents and Housing Services directorate (£0.4m)
- Transfer of staff budgets from Housing in the Residents and Housing Services directorate to Legal in the Finance and Resources directorate (£0.1m)

9.23 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 August to October 2025:

- Permanent increase to salary budgets to reflect the 2025/26 Local Government pay award, net of the reduction in employer pension contributions (£1.0m to Service Reform and Strategy, £1.0m to Children, Young People and Community Development, £0.5m to Neighbourhoods and Regeneration, £0.6m to Residents and Housing Services, £0.6m to Finance and Resources)
- Transfer of three cost centres from the Children, Young People and Community Development directorate to the Residents and Housing Services directorate and realignment of salaries budgets (£0.9m)
- Permanent increase to PCN income budget in the Neighbourhoods and Regeneration directorate (£3.9m)
- Permanent transfer of budget from the Neighbourhoods and Regeneration directorate to fund capital financing (£0.2m)
- Temporary reductions to the Service Reform and Strategy directorate budget to adjust profile of funding for Triple Value Impact project (£0.1m)

- Reversal of temporary adjustment to the budget for Residents and Housing Services directorate (as per the Q2 report) 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 is a technical adjustment to remove the increase to the service expenditure budget from Central Budgets as the income will be received by the service directly. The total budget for the 2025/26 Council Tax Support Hardship fund remains at £1.5m, including the GLA contribution.
- Temporary increase to salary budgets in Residents and Housing Services (£0.1m).

10.0 Dedicated Schools Grant (DSG)

Table 15: 2025/26 Quarter 3 forecast for Dedicated Schools Grant by block

Funding Blocks	Overall DSG Funding 2025/26	Forecast Expenditure	Overspend/ (Underspend)
	£m	£m	£m
Schools Block	126.0	126.0	0.0
High Needs Block	82.5	87.3	4.8
Early Years Block	39.7	39.7	0.0
Central Block	2.4	2.4	0.0
Total DSG	250.6	255.4	4.8

Summary

- 10.1 The DSG forecast for 2025/26 indicates a deficit of £4.8m against grant funds of £250.6m, a £2.1m increase compared to the Q2 forecast, primarily driven by pressures within the High Needs (HN) Block. The forecast assumes that the other Blocks will achieve a balanced budget by year end.
- 10.2 At the end of 2024/25 financial year, the cumulative deficit stood at £13.6m, driven by increasing demand for High Needs provision and pressures on top-up funding allocations. For 2025/26, the DSG budget is projected to close with a rise in the cumulative deficit, now forecast at £18.4m.
- 10.3 The overall DSG allocation reduced by £1.2m following an in-year adjustment by the DfE in July 2025. This adjustment includes a £0.5m increase in the HN Block funding, mainly to fund additional special free

school places, and £1.7m reduction in the Early Years Block after the January 2025 census confirmed a decline in childcare hours compared to the January 2024 census data. The reduction in the Early Years Block funding was anticipated and accounted for in the budgets for this financial year. In response to the low take up of free childcare entitlements in Brent, the Local Authority is prioritising its Best Start in Life planning and the new Early Years strategy to boost and maximise uptake of the local offer.

- 10.4 Although the HN Block allocation increased by £5m in 2025/26 (£2.5m in 2024/25), the growth in EHCPs has continued at a similar pace to previous years. Between January 2025 and September 2025, there was a 7% (8% between January 2024 and January 2025) increase in children and young people with an EHCP, with number increasing from 3791 to 4050 over this period. This sustained demand continues to place significant pressure on the HN Block, driven by rising costs for independent, residential, out of borough placements and post 16 education, as well as the overall increase in EHCP related costs outstripping the growth in funding.

Forecast

- 10.5 The main elements of the forecast position are further detailed below:

DSG High Needs Block forecast	2025/26 Budget	2025/26 Forecast	2025/26 Variance
	£m	£m	£m
Place funding in Brent Special Schools and ARPS	2.7	2.7	0.0
Top up funding in Brent Mainstream, Special schools, and ARPs	47.2	45.3	(1.9)
Recoupment Income	(3.7)	(3.3)	0.4
Residential and Independent settings	11.4	12.3	0.9
Out of borough Top ups	7.6	11.1	3.5
Post 16 Top ups	5.0	6.3	1.3
Early Years Inclusion Fund	1.1	1.1	0.0
SEN Support Services including Education Otherwise/ Awaiting Placement	10.7	11.4	0.7
SEN Support	0.5	0.3	(0.2)
Total Expenditure: High Needs Block	82.5	87.3	4.8

- 10.6 The £4.8m in year deficit against the HN Block is due to several factors. The forecast position is further detailed below:

- i. A pressure of £0.4m is reported due to a reduced forecast for recoupment income from other boroughs for children attending Brent school places. An additional £0.9m pressure relates to education costs for children placed in independent and residential settings.
- ii. There is a £3.5m pressure against the cost of placing Brent children in out-of-borough schools and a further £1.3m pressure against the budgets held for post-16 top up funding.
- iii. The pressure includes £121k from the introduction of a new ARP top up funding rate of £12,500 with effect from September 2025 as agreed by Schools forum in June 2025. The adjustments apply to payments from September 2025.
- iv. SEN support services are forecasting a combined pressure of £0.5m, mainly driven by an increase in high-cost mental health placements in hospitals. These placements are outside the local authority's control, as commissioning powers rest with NHS. Additional pressure is also arising from the growing cost of educating pupils who have been permanently excluded from mainstream schools.

10.7 To mitigate these pressures, 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 control the deficit. Alongside this, the outcome of the government's reforms to the SEND system is expected to address the level of deficits held by local authorities, as this is a national issue and not unique to Brent.

10.8 Local authorities have been allowed to hold high-needs deficits off their balance sheets under a statutory override, which ends on 31 March 2028. As part of the budget announced in November 2025, from 2028/29, the full cost of SEND provision will be funded centrally by government, rather than through local authority budgets and the Dedicated Schools Grant high-needs block. This aims to stop councils from accumulating further SEND debt. However, historic DSG deficits remain unresolved and the government has not committed to writing them off. The Council awaits the Government's Schools White Paper, which will include SEND reform and is expected in 2026.

Risk and Uncertainties

- 10.9 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) and currently 4050 as of end of September. The growth in ECHPs is a national and London wide trend whereby the number of children assessed as meeting the threshold for support continues to increase. 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.
- 10.10 The statutory override set out in the School and Early Years Finance Regulations 2021, which allows local authorities to exclude DSG deficits from their wider financial accounts, thereby preventing them from impacting the Council's General Fund reserves, was initially scheduled to conclude at the end of the 2022/23 financial year. However, recognising the financial challenges faced by local authorities in managing DSG deficits, the government extended the arrangement for a further three financial years, to March 2026, and has since confirmed an additional extension to March 2028. The latest budget announcement has also clarified that local authorities will not be required to recover DSG deficits from their General Fund budgets. This continued protection ensures that overspending in the High Needs Block does not create immediate financial pressure on local budgets, allowing authorities additional time to address underlying structural funding challenges.
- 10.11 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 16: 2025/26 Quarter 3 forecast for Housing Revenue Account

HRA gross income and expenditure			
	Budget	Forecast	Overspend/ (Underspend)
	£m	£m	£m
HRA			
Income	(69.9)	(73.5)	(3.6)
Expenditure	69.9	75.8	5.9
Total	0.0	2.3	2.3

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 £2.3m pressure for the 2024/25 financial year, before utilising reserves. This forecast represents a £0.3m reduction in the projected deficit when compared to the previous quarter. This is due to updating forecasts with the latest income trends, as well as expenditure commitments and projections. Mitigation measures are being implemented to address the 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. 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. The 2025/26 projected net overspend for the HRA is £2.3m. The repair and maintenance budget is forecast to be overspent by £5.6m due to elevated demand, plus a net £300k on other related housing expenditure. This is partly offset against higher than budgeted income of £3.6m due to new units coming on board. The costs of existing and new contracts are being scrutinised to ensure they are at competitive rates, with particular focus on exclusion works, so future expenditure can be managed within budget.
- 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 £0.4m pressure on staffing budgets is projected for 2025/26 due to additional resources required to deal with lettings, maintenance and other administrative tasks, as well as additional project specific resources focusing on service improvements and efficiencies.
- 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, 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 non-recovery of bad debt will need to increase by £0.9m more than initially projected. The service is 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 have assessed the situation and developed 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 £1.2m pressure in 2025/26.
- 11.10 An additional £3.6m 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 £2.3m.
- 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 November, the Capital Programme is reporting a net slippage of £22.6m and a net overspend of £0.8m against the revised budget of £328.9m. 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 17: 2025/26 Quarter 3 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	13.4	12.5	(0.4)	(0.5)
Housing - GF	114.1	115.9	112.8	(2.1)	(0.9)
Housing - HRA	50.4	27.6	26.7	3.5	(4.4)
Public Realm	17.8	34.9	31.1	(0.3)	(3.5)
Regeneration	106.5	84.2	82.0	0.1	(2.3)
CYP & Community Development	17.1	25.5	21.4	0.0	(4.1)
South Kilburn	28.0	26.9	20.0	0.0	(6.9)

St Raphael's	3.2	0.4	0.4	0.0	0.0
Grand Total	346.8	328.9	307.0	0.8	(22.6)

Budget Additions

- 12.2 The revised capital budget for 2025/26 of £328.9m includes new projects approved by Cabinet since Q2, including:
- £4.1m for a variety of NCIL funded capital schemes across multiple programmes, mostly in the Public Realm area.
 - £3.2m for energy efficiency improvements at Oaks and Pharamond social housing properties funded by grant and Carbon Offset Fund.
 - £11.7m for the Council Homes Acquisition Programme to acquire properties for temporary accommodation part-funded by GLA grant under the Housing General Fund.
 - £0.9m for an alternative heating source at Willesden Green Library funded by grant and Carbon Offset Fund.
- 12.3 The Council has also been awarded £1.5m of Pride in Place Impact Fund Grant to fund improvements in public spaces, community spaces and high street and town centre revitalization. As a result, £0.5m has been added to the 2025/26 budget and £1.0m has been added to the 2026/27 budget. Following consultation with Cabinet members, priority thematic areas will include “Pride in Parks”, “Pride in High Streets” and “Don’t mess with Brent”.
- 12.4 The revised 2025/26 budget also includes the following changes:
- £0.3m increase in Corporate Landlord budget for new legal software funded by revenue reserves.
 - £2m virement from the Regeneration contingency to the South Kilburn budgets to cover both current and historic unpaid Council Tax and Service Charges from vacant properties that have been decanted awaiting demolition.
 - A further £2.8m virement from the Regeneration contingency to the South Kilburn budget over the next three years to enable a budget increase for the Carlton and Granville project to deliver community spaces and social homes following additional costs from project delays and disputes with the supplier.
- 12.5 Since Q2, £45.3m has been reprofiled from 2025/26 into future years’ budgets, £2.7m has been removed as budget corrections to previously approved schemes and £0.8m has been removed for schemes not progressing.

- 12.6 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. All funds have been earmarked, and no uncommitted balance remains available for new initiatives at this time.
- £94.1m: Formally commissioned by Cabinet; expenditure pending.
 - £8.1m: Approved at sub-board level; awaiting Cabinet agreement.
 - £54.7m: Provisionally allocated to prospective projects; subject to formal Cabinet approval.

Corporate Landlord

- 12.7 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), largely driven by forecast underspend of £0.5m on Grove Park Pavilion Nursery as the project is unlikely to proceed. The forecast also includes slippage of £0.3m on Roy Smith House refurbishments, which are on hold due to a recent water supply issue.

Housing

- 12.8 The Housing General Fund is forecasting a variance of £3.0m driven by an underspend of £2.8m on the Local Authority Housing Fund (LAHF) programme. The LAHF scheme is grant funding for the acquisition of local properties for temporary accommodation and resettlement. Despite the underspend, the project is on track to meet the 42-property target, with 29 properties purchased to date, and 13 in conveyancing. The forecast underspend has reduced significantly since Q2 (by £1.3m), as officers have changed strategy toward acquiring larger properties to provide temporary accommodation for higher need families. 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 expected. It is now anticipated that at least 14 properties will be ready to let before Christmas.
- 12.9 Brent's New Council Homes Programme is progressing well, with 418 affordable homes delivered so far in 2025/26. This financial year, 303 more units are expected: Clock Cottages, Pharamond, Watling Gardens and Alperton Bus Garages. As previously reported, most projects remain on budget apart from Clock Cottages, which is forecasting an overspend of £0.9m. The safeguarding bid for additional grant funding from the GLA was approved in November, so the overspend will not be financed by additional borrowing.

- 12.10 The programme slippage of £0.9m relates to Disabled Facilities and Empty Properties Grants. It is possible that the full budget will be spent this financial year as works tend to complete and closer to year end, but based on the current level of expenditure, officers are anticipating some slippage into 2026/27.
- 12.11 The Housing HRA programme is forecasting a variance of (£0.9m) caused by slippage of £4.4m on the Tower Blocks refurbishment programme related to Windmill Court, as the Major Repairs team are reviewing ways to increase the affordability of the project. The Kilburn Square Tower Block refurbishment project is forecasting an overspend of £3.8m. Officers are exploring value-engineering opportunities on the Windmill Court refurbishment as a way of mitigating the impact of this overspend.
- 12.12 As Brent's New Homes Programme reaches completion in 2026/27, officers are facing challenges in planning new development projects. The rising interest and construction costs combined with the current HRA budget position and slippage on housing schemes delaying anticipated rental income make further new build developments challenging from a viability perspective.

Regeneration

- 12.13 The Regeneration programme is delivering new homes, infrastructure and community assets designed to support inclusive growth and sustainability. Since Q2, budgets for Staples Corner Growth Area Infrastructure (£0.3m), Neasden Civic Partnerships Programme (£0.9m) and Wembley Housing Zones (£10.6m) have been reprofiled to future years in line with delivery plans resulting in a total revised budget of £84.2m for 2025/26. Wembley Housing Zones is still forecast to complete on time in September 2026.
- 12.14 The programme is currently forecasting slippage of £2.3m. This is made up of £0.6m on Mahogany Arts Capital Improvement works, £0.7m on Bridge Park Regeneration as planned demolition was on hold until a listing decision was made and £0.6m on Alperton Medical Centre because of ongoing discussions between the developer and the NHS.
- 12.15 A key risk facing the Regeneration programme is delays on grant funded projects where grant conditions require completion by 31st March 2026. Officers are working to reduce delays and are in discussions with funding partners, but reductions in funding sources may lead to projects not being delivered to initial specifications or additional borrowing being incurred.

South Kilburn

- 12.16 The procurement process for the Single Delivery Partner (SDP) is progressing well, with three bidders shortlisted. A key element of this process is the incorporation of comprehensive contractual mitigations to address critical risks, including financial exposure, to ensure robust and secure delivery for Brent. The SDP model is intended to streamline delivery and improve co-ordination of the major regeneration programme. The move to a single delivery partner model has delayed some schemes in the programme, so officers have processed budget reprofiles totaling £5.8m to future years in line with anticipated delivery.
- 12.17 The South Kilburn programme is currently forecasting slippage of £6.9m. The majority of the slippage of £6.7m is projected against the South Kilburn Energy Network. Following the tender process, officers are reviewing the scheme to ensure affordability and working towards revising capital budgets.
- 12.18 The main risk to the South Kilburn programme is the adoption of the Single Delivery Partner model and the ongoing procurement. Officers have appointed external commercial advisers and are in ongoing discussions with the GLA to identify and mitigate risks arising from the new model.

Children, Young People and Community Development

- 12.19 The Children, Young People and Community Development programme is forecasting slippage of £4.1m. £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. There is slippage of £1.4m on the SEND Capital programme as one project has now become part of the DfE School Rebuilding Programme, which will involve a complete rebuild of the site.
- 12.20 The budget for Islamia Primary School has been removed for 2025/26 and future years as the project is not going ahead in its original form as Cabinet have agreed to relocate the school to the Gwenneth Rickus site.
- 12.21 A challenge for the CYP programme has been the identification of unforeseen ground and building conditions issues which were not factored into initial budgets, as reported at Q2. Officers continue to monitor the situation, and the SEND expansion projects are still forecast to remain within their overall budget allocations.

Public Realm

- 12.22 The Public Realm Board is designed to deliver improvements to community infrastructure in Brent, including roads, parks and CCTV. The budget for 2025/26 has reduced by £4.9m compared to Q2 because of the removal of

the budget for the waste bins project not going ahead, and reprofiling for the Beresford Avenue / Mount Pleasant CPZ and Northwick Park Mortuary Schemes. This has been offset by an increase of £3.7m for new NCIL schemes approved by Cabinet in September.

- 12.23 The (£3.8m) variance in Public Realm is driven by £2.1m slippage on Safer Streets and Parking due to delays in obtaining TFL approvals. There is further £1.2m slippage on parks caused by changes in procurement law delaying the sports pitch improvement project tendering process, and health and safety issues delaying the Northwick Park Pavillion upgrade.
- 12.24 Most NCIL projects are currently forecasting to be delivered on time and to budget, but the habitat bank project is reporting £0.1m of slippage.
- 12.25 Public Realm continues to face the challenge of increasing expenditure during the latter part of the financial year following the in-year approval of NCIL and SCIL-funded projects. The large number of small projects within the programme can be difficult to forecast, especially as uncontrollable circumstances can impact delivery, such as poor weather conditions.

Treasury Management Prudential Indicators

- 12.26 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 second 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 1 2025/26. Financial implications of agreeing to this report are included within the forecasts provided.

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

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 Three 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 3 of 2025/26 (October 2025 position).

Capital Expenditure & Financing at Q3 2025/26 (£m)	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	Total 2024/25-2029/30
	Actual	Estimated	Estimated	Estimated	Estimated	Estimated	Totals
Corporate Landlord	11.6	13.4	9.3	3.5	2.7	0.6	37.8
Housing GF	71.0	115.9	9.7	21.1	17.5	0.0	217.6
Schools	22.1	25.5	17.7	9.3	5.3	0.0	74.6
Regeneration	34.6	84.2	92.3	46.5	16.6	0.0	257.7
Public Realm	18.0	34.9	12.2	3.7	6.0	0.2	68.9
South Kilburn	20.4	26.9	31.8	23.2	7.6	1.2	102.3
St Raphael's	0.2	0.4	6.9	12.5	0.0	0.0	20.0
HRA	60.9	27.6	88.8	11.6	0.4	0.0	188.9
Total Capital Expenditure	238.8	328.9	268.7	131.4	56.1	2.0	967.8
Financed By:							
Grants	52.0	94.4	31.0	10.7	6.1	0.8	188.1
Section 106	11.9	27.0	23.1	24.4	14.4	0.0	86.4
Capital Receipts	17.3	3.6	11.3	34.4	2.1	0.4	66.6
Earmarked Reserves	1.2	5.4	2.7	1.0	1.0	0.1	10.3
Major Repairs Reserve	16.6	0.0	0.0	0.0	0.0	0.0	16.6
Revenue Contributions	11.4	11.1	3.5	1.9	6.6	0.6	27.9
Borrowing	128.3	187.4	197.1	59.0	25.9	0.1	571.9
Total Capital Financing	238.8	328.9	268.7	131.4	56.1	2.0	967.8

(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 Q3 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	1,505.3	1,648.1	1,634.7	1,568.5
Capital Expenditure	238.8	328.9	268.7	131.4	56.1	2.0
External Resources	(63.9)	(121.4)	(54.1)	(35.1)	(20.5)	(0.8)
Internal Resources	(46.5)	(20.1)	(17.5)	(37.3)	(9.7)	(1.1)
MRP	(24.9)	(39.2)	(54.3)	(72.4)	(92.1)	(112.4)
Capital Loans Repaid	(0.8)	0.0	0.0	0.0	0.0	0.0
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	1,505.3	1,648.1	1,634.7	1,568.5	1,456.2

*MRP includes PFI/Leases IFRS16 adoption.

(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 Q3 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	1,090.5	1,287.6	1,346.5	1,372.5	1,372.6
PFI & Leases	32.5	28.5	24.7	22.7	20.4	17.0
Total External Debt Liabilities	932.5	1,118.9	1,312.3	1,369.2	1,392.8	1,389.6
Internal Borrowing	424.6	386.4	335.8	265.5	175.6	66.6
Capital Financing Requirement	1,357.1	1,505.3	1,648.1	1,634.7	1,568.5	1,456.2

(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 Q3 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	1,505.3	1,648.1	1,634.7	1,568.5	1,456.2
LOBO Loans	59.5	5.0	24.5	0.0	10.0	10.0
Non LOBO Loans	840.5	1,085.5	1,263.1	1,346.5	1,362.5	1,362.6
Balance Sheet Resources	(616.7)	(495.7)	(494.7)	(493.7)	(492.7)	(491.7)
Net Loan Requirement	852.7	1,070.5	1,267.6	1,326.5	1,352.5	1,352.6
Plus Liquidity Allowance	20.0	20.0	20.0	20.0	20.0	20.0
Liability Benchmark	872.7	1,090.5	1,287.6	1,346.5	1,372.5	1,372.6

(d) Authorised limit and Operational Boundary for External Debt

The Operational Boundary for External Debt is based on the Council's estimate of most likely i.e. prudent, but not worst-case scenario for external debt. It links directly to the Council's estimates of capital expenditure, the capital financing requirement and cash flow requirements and is a key management tool for in-year monitoring.

Other long-term liabilities comprise finance leases, Private Finance Initiative contracts and other liabilities that are not borrowing but form part of the Council's debt.

The Authorised Limit for External Debt is the affordable borrowing limit determined in compliance with the Local Government Act 2003. It is the maximum amount of debt that the Council can legally owe. The authorised limit provides headroom over and above the operational boundary for unusual cash movements.

Authorised Limit at Q3 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 Q3 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 Q3 2025/26	Upper Limit	Lower limit	2025/26	2025/26	2025/26	2025/26	2025/26
			Actual Borrowing 30.10.2025	Actual Borrowing 30.10.2025	Forecast Borrowing at 31.03.2026	Forecast Borrowing at 31.03.2026	Compliance with limits
	%	%	£m	%	£m	%	
Under 12 months	40	0	100.0	10.0%	80.0	8.02%	Yes
12 months & within 24 months	40	0	36.5	3.7%	41.5	4.16%	Yes

24 months and within 5 years	40	0	58.7	5.9%	58.7	5.89%	Yes
5 years and within 10 years	60	0	129.5	13.0%	128.5	12.89%	Yes
10 years and within 20 years	75	0	255.1	25.6%	272.8	27.36%	Yes
20 years and within 30 years	75	0	156.8	15.8%	156.8	15.72%	Yes
30 years and within 40 years	75	0	153.8	15.5%	153.8	15.42%	Yes
Over 40 years	75	0	105.0	10.5%	105.0	10.53%	Yes
Total			995.5	100.0%	997.1	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 Q3 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	43.0	51.6	58.3	67.0	76.4
Net Revenue Stream (£m)	431.4	431.4	431.4	448.7	465.8	483.8
Proportion of net revenue stream (%)	8.11%	9.97%	11.96%	12.99%	14.39%	15.79%

Financing costs can be further broken down as follows.

Capital Financing Costs at Q3 2025/26 (£m)	2025/26	2026/27	2027/28	2028/29	2029/30
	Estimated	Estimated	Estimated	Estimated	Estimated
Total Gross External Debt Interest	28.2	57.5	59.9	60.1	59.6

Total Interest Payable & Expenses	53.3	58.7	61.0	61.3	60.8
Total Interest Receivable	(29.9)	(32.0)	(35.9)	(37.4)	(38.0)
Net Interest	23.4	26.7	25.1	23.9	22.8
MRP (Excluding PFI)	19.6	24.9	33.2	43.1	53.6
Total Interest & MRP	43.0	51.6	58.3	67.0	76.4
Revenue Contributions to Capital Programme	0.0	0.0	0.0	0.0	0.0
Total Capital Financing Costs	43.0	51.6	58.3	67.0	76.4

(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 Q3 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 Q3 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 Q3 2025/26 (£m)	2025/26	2025/26
	Approved	Actual
Total cash available within 3 months	20.0	55.7

(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 Q3 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 Q3 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

(I) 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 Q3 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 Q3 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 at Q3 2025/26	2025/26	2026/27	2027/28	2028/29	2029/30
	Estimated	Estimated	Estimated	Estimated	Estimated
External Debt (Loans)	1,090.45	1,287.58	1,346.49	1,372.46	1,372.57
Net Service Expenditure	431.4	448.7	465.8	483.8	483.8
Debt to net service expenditure ratio	2.5	2.9	2.9	2.8	2.8

	<p align="center">Resources & Public Realm Scrutiny Committee 24 February 2026</p>
	<p align="center">Report from the Corporate Director of Resident and Housing Services</p>
	<p align="center">Lead Member: Cabinet Member for Housing - Councillor Donnelly-Jackson</p>
<p align="center">Housing Revenue Account (HRA) Update</p>	

Wards Affected:	All
Key or Non-Key Decision:	Non-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 Tel: 020 8937 2546 Email: Spencer.Randolph@brent.gov.uk</p> <p>Jekaterina Popova Head of Finance, Finance and Resources Tel: 020 8937 1463 Email: Jekaterina.Popova@brent.gov.uk</p>

1.0 Executive Summary

- 1.1 This report provides an overview of the Housing Revenue Account (HRA), highlights its financial position and set out key risks and challenges facing this fund.
- 1.2 Budgets for the Housing Management function are contained within the ring-fenced Housing Revenue Account (HRA) account, which is required by statute to have a balanced budget. For 2025/26 the budget is made up of £69.9m of income matched by expenditure. The forecast at Quarter 3 is a projected overspend of £2.3m, which is, if materialises, expected to be covered from reserves at the end of the financial year.
- 1.3 In the context of continued uncertainty surrounding inflation and interest rates, alongside rising costs associated with major works and the increasing

complexity of regulatory and building standard requirements, including fire safety, energy efficiency and decarbonisation, the HRA is subject to significant financial pressures. As a result, investment plans must be developed and implemented with caution, incorporating sufficient flexibility to allow for reprioritisation, scaling back or modification where necessary to ensure ongoing financial sustainability.

2.0 Recommendation(s)

- 2.1 That the Committee notes the overall financial position of the HRA, the actions being taken to manage the issues arising and provides comment on the performance and position as necessary.

3.0 Detail

3.1 Contribution to Borough Plan Priorities & Strategic Context

- 3.1.1 The Council's HRA makes a significant contribution to the Borough Plan priority of Prosperity and Stability in Brent by maintaining a financially sustainable housing service that supports residents during ongoing cost-of-living pressures. Effective financial management enables the Council to keep rents affordable, provide tenancy support and welfare-focused interventions, and reduce the risk of rent arrears and homelessness, helping to tackle inequality and promote financial stability for tenants.
- 3.1.2 A strong HRA financial position also underpins the Council's ambition to increase the supply of genuinely affordable housing. Through prudent long-term planning, responsible borrowing and careful maintenance of reserves, the HRA supports investment in new council homes, property acquisitions and the ongoing improvement of existing estates. This directly contributes to the delivery of safe, secure and decent housing, while reducing reliance on temporary accommodation and associated financial pressures.
- 3.1.3 In addition, the HRA supports the Council's Cleaner, Greener Future objectives by funding capital investment in energy efficiency, estate regeneration and planned maintenance programmes. These investments improve housing quality, reduce carbon emissions and help lower household energy costs, supporting both environmental sustainability and improved health and wellbeing outcomes.
- 3.1.4 Overall, strong financial stewardship of the HRA ensures that housing services remain resilient, affordable and aligned with the Council's wider strategic priorities. By balancing tenant affordability with long-term investment, the HRA plays a key role in supporting thriving communities, reducing inequality and promoting sustainable growth across the borough.

3.2 Background

- 3.2.1 The Housing Revenue Account (HRA) is a ring-fenced account that records all income and expenditure associated with the Council's landlord responsibilities. This relates to a total housing stock of 12,537 dwellings, comprising 8,683 tenanted properties and 3,854 leasehold properties.
- 3.2.2 The HRA self-financing system for Council housing was introduced in April 2012. Under this framework, the HRA continues to operate as a ring-fenced account within the General Fund, capturing all income and expenditure attributable to council dwellings. The self-financing model enables local authority landlords to manage, maintain and invest in their housing stock using the rental income generated.
- 3.2.3 The HRA budget is set annually within the context of a 30-year Business Plan. This Business Plan is reviewed each year to support horizon scanning and to identify and mitigate risks across the short, medium and long term. Early identification of risks supports effective financial planning and the implementation of mitigating actions, ensuring the ongoing financial sustainability of the HRA and the delivery of its key objectives, namely to
- Expand and accelerate the development of new council homes;
 - Continue to maintain and improve existing council homes; and
 - Transformation and continuous improvement of front-line services to tenants and leaseholders.
- 3.2.4 Regular review of assumptions is important in order to help the Council make early decisions that help keep the HRA in balance, whilst also delivering substantial levels of investment in Council housing.

HRA Forecast 2025/26

- 3.2.5 Budgets for the Housing Management function are held within the ring-fenced HRA. The HRA has a balanced budget for 2025/26, with £69.9m of income matched by £69.9m of expenditure.
- 3.2.6 The HRA is experiencing material cost pressures arising from sustained high inflation and interest rates, which are increasing both operational and capital costs. Repairs and maintenance budgets are under particular strain due to elevated demand, complex repairs, and issues such as damp and mould, alongside uncertainty associated with newly implemented contracts. For 2025/26, the Housing Revenue Account is forecasting a net overspend of £2.3m. This position is primarily attributable to a £5.8m pressure on repairs and maintenance and additional management costs, partially offset by £3.6m of additional rental income arising from new homes. Mitigation actions are underway, and reserves have been identified to address any year-end shortfall if required. The fund continues to face significant financial challenges.
- 3.2.7 Further risks relate to the capital programme, where insufficient government funding for statutory and environmental requirements, including fire safety and carbon reduction, places additional pressure on HRA resources. The interest

charge on borrowing for the year is forecast to be £1m higher than initially projected.

3.2.8 Rent arrears present an ongoing risk to the HRA’s financial sustainability, with the bad debt provision forecast to increase by £0.9m. Mitigation measures are being explored to improve collection rates. In addition, a remediation programme arising from a self-referral is expected to cost £1m in 2025/26, with further details to be confirmed. Other pressures, including decants, council tax, insurance and pest control, are forecast to add £1.2m of costs.

3.2.9 Although additional rental income is expected from continued housing growth, the planned £4m revenue contribution to capital expenditure for 2025/26 is no longer forecast to be achievable. This eases immediate revenue pressures but increases reliance on borrowing, resulting in an overall projected HRA deficit of £2.3m.

HRA Business Plan

3.2.10 The HRA budget is set annually within the context of the 30-year Business Plan, which is reviewed each year to support forward financial planning and the identification and mitigation of risks. The HRA business plan provides long-term financial forecasts resulting from the implications of the Council’s spending, investment and rent-setting decisions, based on the authority’s current income, expenditure and investment expectations. The data is combined with key assumptions on how costs and income might change in the future to illustrate what the authority can reasonably expect to happen, using the best available information at the time. Regular review of assumptions is important to help the Council to make early decisions that help keep the HRA in balance, whilst also delivering substantial levels of investment in Council housing.

3.2.11 A summary of the key assumptions that underpin the 30-year Business Plan are presented below:

Description	How it impacts the Business Plan	Assumptions used in the Business Plan
HRA stock movements	Projected rental income is based on stock numbers at different rent designations (low-cost social/affordable/London affordable rent/other)	Baseline stock numbers in the current year are adjusted for projected RTB sales and new affordable housing supply

Description	How it impacts the Business Plan	Assumptions used in the Business Plan
Inflation on supplies and services	Income and expenditure are adjusted for inflation to reflect general cost increases. CPI forecast is based on rate in September of previous year.	Rental income uses CPI+1%. All other expenditure is assumed at RPI. CPI 3.8% in year 1, reducing to 2% from year 4 onwards. RPI 3.2% in year 1, reducing gradually to 2.85% from year 3 onwards.
Minimum Working Balance	Target level of minimum reserve for any overspends	Working balance requirements assumed at 5% of income giving circa £3.7m
Rental Income	Tenant rent projections are driven by stock numbers and average rent. Tenant rent is the largest source of income for the HRA.	Average rent is currently set at £145.28 per week. Rent is adjusted as per government policy. Assumed CPI+1% for duration of business plan.
Supervision and Management Costs	Rental income is allocated to management costs of providing a landlord service	Cost assumed to increase by RPI each year
Service Charges	Cost of specific services are charged back to tenants and leaseholders	Service charge uplift is in line with anticipated cost increases at RPI
Voids	Level of void properties have an impact on rental income that can be charged	Rent loss through voids estimated at 3.5% of rent for 2026/27 and 3% thereafter
Bad Debts	Rent arrears that are not collected results in loss of income	Assumed 2.5% in 2026/27 and 2% thereafter
Repairs and Maintenance Costs	Rental income is allocated to repairs budgets	Expenditure is adjusted in line with RPI and stock movements
Right to Buy Sales	Stock reductions reduce rental income and set a target for the Council to achieve 1-4-1 replacements	Projected 50 sales in 2025/26, 80 sales in 2026/27, and 7 sales per year thereafter

Description	How it impacts the Business Plan	Assumptions used in the Business Plan
Interest rate on borrowing	Rental income is allocated to financing debt	New debt is assumed at average interest rate of 4.8%.
Capital Programme - Major Works	Investment to maintain housing stock	Profiling over 5 years based on Asset Management Strategy.
HRA Debt Balance	The HRA debt balance as at 31 March 2025 was £348m	Accumulated reserve balances will determine capacity for debt repayments
RTB Receipts	Rolling five year spend targets are set by MHCLG based on RTB sales	It is currently assumed in the business plan that spend targets will be met to achieve 1-4-1 replacement of homes.
Affordable Housing Supply	834 affordable homes will have been completed in the financial years 2025/26 and 2026/27.	583 of these homes will complete in 2025/26 and a further 251 will complete in 2026/27. Of these, 594 are at London Affordable Rent and 240 at Low-Cost Social rent.

3.2.12 Alongside the baseline assumptions, a sensitivity analysis is undertaken to explore the impact on reserve balances from a range of assumptions. Considering each of these in turn enables to read the baseline financial projections in the context of potential changes and so gives an indication of key risks. The key sensitivities analysed are:

- A) Baseline assumptions
- B) RPI cost inflation plus 0.5%: 3.7% in 2026/27, 3.56% in 2027/28, 3.35% in 2028/29, and 3.34% thereafter.
- C) Voids 0.5% higher than baseline
- D) Bad debt 1% higher than baseline
- E) Rent at CPI from year 11 onwards

3.2.13 The sensitivity analysis demonstrates that:

- A) Baseline assumptions provide consistently small surpluses over 30 years, with a projected reserve balance of £154.7m in year 30, which could potentially be used to reduce debt.
- B) Cost inflation at RPI plus 0.5% is projected to result in year-on-year deficits from 2034/35, and HRA reserves running out by 2042/43.
- C) Voids 0.5% higher than baseline leads to reduced surpluses, with a reduction of the projected reserve balance to £139.4m in year 30. A net impact of £15.3m over the 30-year period.
- D) Bad debt 1% higher than baseline leads to reduced surpluses, with a net reduction of the projected reserve balance to £113.6m in year 30. A net impact of £41.1m over the 30-year period.
- E) Rent increasing at CPI from year 11 (rather than CPI+1% in the baseline assumptions) results in increasing deficits from year 15 with reserves depleted by 2049/50.

3.2.14 In summary, if voids run 0.5% higher than baseline, bad debt write off is 1% higher than baseline, and RPI is 0.5% higher than baseline, there will be consistent deficits on the HRA with a negative reserve of £0.9m by 2035/36.

3.2.15 While the HRA's operating reserve currently stands at £4.5m (6% of the turnover, against the target level of 5%) and the fund has £5.9m set aside in earmarked reserves, this figure remains relatively low compared to the Council's peers. In absolute terms, the operating reserve balance is £9.6m lower than peer average. The average reserve balance per unit of stock for peers is also higher at £1,351 per unit, which is £807 higher than Brent at £544 per unit of stock.

3.2.16 In 2025/26, Brent's HRA is forecasting a requirement of £2.3m from the operating reserve in order to deliver a break-even outturn. This would leave £2.2m within the operating reserve and £5.9m in earmarked reserves. The operating reserve would then represent approximately 3% of total rental income, below the 5% target incorporated into the Business Plan. However, total reserves, including earmarked reserves, are projected to represent around 11% of total rental income, compared with a sector-wide adequacy benchmark of 10%.

3.2.17 The comparatively smaller reserve base, when compared to peers, presents a financial risk, limiting the Council's capacity to respond effectively to unforeseen financial pressures or emergencies. The level of reserves is currently not projected to increase while the fund is experiencing significant financial pressures and the tower block programme and affordable housing supply require significant investment. However strengthening reserve levels in future years will be important to enhance financial resilience and ensure greater flexibility in managing future budgetary challenges.

Rent Convergence

3.2.18 The government confirmed at the Spending Review that it will implement a rent convergence mechanism as part of the new rent settlement. Social rent convergence aims to align rents for social housing properties that are currently below the 'formula rent', which is the maximum rent allowed for a property when let to a new tenant. The convergence mechanism allows rents on properties below formula rent to increase by an additional amount each year, over and above the Consumer Prices Index (CPI) + 1% cap, until they reach the formula rent level. This mechanism was previously introduced in 2002 but was discontinued in 2015. The government has now confirmed the details and the increase will be implemented from 2027/28 at £1 per week above CPI + 1%, increasing to £2 per week from 2028/29 until formula rent is reached.

3.2.19 This helps to increase the sustainability of the HRA and adds £18.6m of income over the first ten years of the Business Plan starting from 2027/28, net of voids and bad debt provision, or £1.86m per annum. Within the current Business Plan, rent convergence is projected to reach 56% by Year 5 and 81% by Year 10.

3.2.20 If further changes are implemented, or if the convergence period is shorter than anticipated, it is likely that annual savings targets will need to be introduced to maintain a balanced financial position.

Risks and Uncertainties

3.2.21 As mentioned earlier in the report, Brent's HRA is facing significant financial pressures driven by escalating maintenance and repair costs and increasing demand for affordable housing. These challenges are compounded by rising borrowing costs, which have increased debt servicing expenses and limited the councils' capacity to finance new housing developments. Additional regulatory requirements related to building safety and energy efficiency standards are also resulting in considerable additional compliance costs. Rising inflation and supply chain disruptions have further exacerbated expenditure, while welfare reforms and demographic shifts continue to impact rental collection rates, increasing the risk of arrears. As a result, the HRA is encountering considerable financial difficulties in balancing its obligations to provide safe, affordable housing while maintaining fiscal sustainability, necessitating urgent strategic financial planning, service adjustments and cost mitigations.

3.2.22 The level of additional rental income from new builds that are being added to the HRA portfolio as part of the capital programme (the majority are also at the London Affordable Rent (LAR) level rather than Social/Formula rent) and the recently confirmed rent convergence help to alleviate financial pressures within the HRA considerably and no deficits are being projected over the duration of the 30-year business plan. However the position remains highly volatile, and factors such as increased borrowing, higher-than-expected void losses, or lower-than-forecast debt recovery rates may impact the fund's financial position.

- 3.2.23 The main variables that could affect the long-term viability of the Business Plan are rent levels and long-term major works and repairs. There has already been a change to the Council's power to increase rents annually up to a maximum of CPI plus 1%, with an introduced rent rise limitation of 7% in 2023/24, however the government has now provided a 10-year settlement on social housing rent policy allowing social housing rents to increase by CPI plus 1% each year for 2026 - 2036. However, collection rates remain volatile.
- 3.2.24 The main source of income for the HRA is rent. These are forecast to generate £62.4m of income in 2025/26. Therefore, effective management of rent debt levels is 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.
- 3.2.25 As of January 2026, the tenants debt balance is £13.5m, of which £4.6m relates to former tenants and £8.9m to current tenants. The debt is increasing by approximately £176k per month and is forecast to increase the total outstanding balance by £2.1m by the financial year end. In 2024/25, the amount of total debt has increased by 21%. For Brent, total cumulative arrears as a percentage of the rent roll represent 22% against the London average of 9.9%. The collection rate currently stands at 94.91% against the current year's debt and 10.19% against prior years' debt. The 30-year HRA Business Plan currently assumes a 98% collection rate.
- 3.2.26 The current leaseholder debt stands at £5.7m, representing a reduction of £1.5m since the start of the financial year. However, no charges have yet been raised for the current financial year. To account for the risk of non-collection, a provision is applied as follows: 20% for debt raised within the current year, 70% for debt that is one year old, and 100% for debt older than two years.
- 3.2.27 It is estimated that for every 1% reduction in rent collection, there is a corresponding income loss of approximately £0.6m. For 2025/26, the required allowance for non-collection is £2.3m. Any improvements in debt recovery performance could help reduce this provision and potentially release funding to support other service areas.
- 3.2.28 Effective voids management is also crucial for maintaining the financial health of the HRA. Minimising the length of time properties remain vacant directly impacts rental income, helping to reduce revenue losses and ensuring a steady cash flow. Additionally, efficient voids management supports the timely re-letting of homes, which not only meets housing demand but also optimises asset utilisation. By carefully managing voids, the Council can control associated costs such as repairs and maintenance, ultimately ensuring that resources are maximised to support ongoing housing services and investment in stock quality.

3.2.29 Based on current performance, voids account for 5.07% of social/formula rent properties, resulting in an estimated rental income loss of £3m for 2025/26. In comparison, peers report a median void loss rate of 2.2%. A 1% reduction in void losses would generate approximately £0.6m in additional annual income.

3.2.30 The HRA is facing heightened demand for repairs and maintenance services. A substantial volume of complex repairs, alongside an increase in issues such as damp and mould, is placing considerable strain on existing budgets. Appropriate and accurate management of repairs and maintenance expenditure is vital to safeguarding the financial integrity of the Council's HRA. The Repairs and Management spend in 2025/26 is forecast to be £23m, 31% of the fund's total income. The table below provides a comparison of Brent's maintenance costs against the median figures.

	23-24 LB Brent	24-25 LB Brent	Median
Maintenance (Responsive repairs + Void works + Building safety + Other planned works)	£1,457	£2,324	£1,909
• Responsive repairs	£713	£1,452	£1,067
• Void works	£332	£202	£230
• Building safety	£412	£670	£507

3.2.31 In April 2025, the Council self-referred to the Regulator of Social Housing due to breaches in building safety compliance, culminating in a regulatory judgement of C3 issued on 28 May 2025. Health and Safety Specialist have been contracted to support ongoing improvement work, providing additional objective and independent oversight, as well building safety expertise and undertaking an audit and root cause analysis. These have highlighted and clarified several areas that the service had already identified as needing focus as well as some additional key learning and have fed into the development of a robust action plan for improvement to ensure permanent solutions are in place to prevent similar issues arising in the future and will form a key part of the agenda and monitoring for the relevant project board under the newly established Housing and Tenant Improvement Programme. Comparable local authorities have incurred costs of around £2.3m in similar circumstances. As a result of the Council's self-referral, the required remediation programme introduces a material financial risk to the HRA, with additional costs associated with addressing identified compliance issues. These costs and related financing assumptions have been incorporated into the HRA 30-Year Business Plan, and it is essential that spending and investment decisions continue to be approached with caution.

3.2.32 Global conflicts, Brexit, high levels of inflation, labour shortages and rising interest rates present the Council with a volatile and uncertain economic environment. The cost of living crisis impacts residents of Brent and the Council is committed to doing what it can to support those in greatest need. Cost pressures and risk of income collection losses are continuously monitored. A

number of mitigations are in place to help support tenants on universal credit, along with Council Resident Support Fund to help with financial hardship.

- 3.2.33 Inflation over the past few years has experienced such high levels that have not been seen since the 1980's. Besides rising energy costs, other goods are also experiencing increases in prices, due to factors such as labour shortages, pay rises, logistic issues and a general trend to increase prices and restore profit margins where previously slumps in demand had suppressed price levels. In September 2025 CPI stood at 3.8% against a Bank of England target of 2%. The September inflation figures are important as they are used for the following years uplift on formula rent levels, 2023/24 being an exception with a 7% ceiling, as opposed to 11.1%. The gap between inflation on rent levels and inflation on costs is a significant risk to the long-term business plan. Inflation rates assumed in the current business plan is informed by projections from Bank of England, which is currently forecasting CPI inflation to return to the 2% target by the second quarter of 2026.
- 3.2.34 As the Council adds more stock to its portfolio and complexities of new additional requirements to building standards are increasing, such as fire safety works and decarbonisation, the cost of major works are rising. At the moment, there is insufficient government subsidy available to address these changes. The Asset Management Strategy and investment plans must be approached cautiously and allow for flexibility to scale back on schemes where required.
- 3.2.35 Impacts of national housing policies and any changes proposed in future Government papers can have an adverse impact on the HRA and could require additional resources to address any unexpected changes.
- 3.2.36 Whilst the Council is confident in its ability to continue delivering affordable homes for Brent residents, there are social and economic factors, which are increasingly placing pressure on both current schemes that are on site and those in the Council's pipeline. Brexit, inflation, shortage of labour, materials and global events such as the Covid-19 pandemic and wars have had an adverse effect on costs and therefore the financial viability of capital schemes. Developing affordable housing remains challenging within the current market which is resulting in the tenure of schemes being revisited and some pipeline schemes pausing. Though costs of materials have recently stabilised, they remain high.
- 3.2.37 Significant grant funding is essential to pay for new build schemes. The Council has entered into grant agreements with the Greater London Authority governing the award of such funding to include the requirement to deliver specified numbers of new homes with start on site dates specified. Failure to observe grant conditions or achieve specified delivery numbers may lead to a requirement to repay grant funding and therefore efficient and timely delivery approaches are essential to mitigate the risk.
- 3.2.38 The HRA debt cap has been removed and significant borrowing is required to invest in stock to increase housing supply in Brent. The HRA is exposed to interest rate fluctuations, which can have a significant impact on revenue

budgets and the overall business plan. Brent Council operates a one-pool approach to its borrowing, where the HRA receives a proportion of the Council's overall borrowing but with a reduced rate. Having remained at 1% or less since February 2009, base rates began rising in June 2022. The forecast borrowing rate for the HRA is based on the medium to long term PWLB borrowing rate at the discounted value for the HRA, at an average of 4.8%.

3.2.39 Spend targets for 1-4-1 receipts set by Government mean that the Council may need to transfer receipts with compounded interest, if spend targets are not met within 5 years of receiving the receipt. There are currently sufficient schemes in pipeline to be able to utilise receipts towards adding affordable housing in Brent.

3.2.40 There are also demographic changes and a general recognition that there should be better integration of housing, social care and health services. As time goes on, a proportion of the population who are elderly or vulnerable increases and there is an increased need for appropriate housing. However, with limited clarity on the government's funding of supported housing, it is likely that the problem of how to house vulnerable elderly people will intensify.

Savings

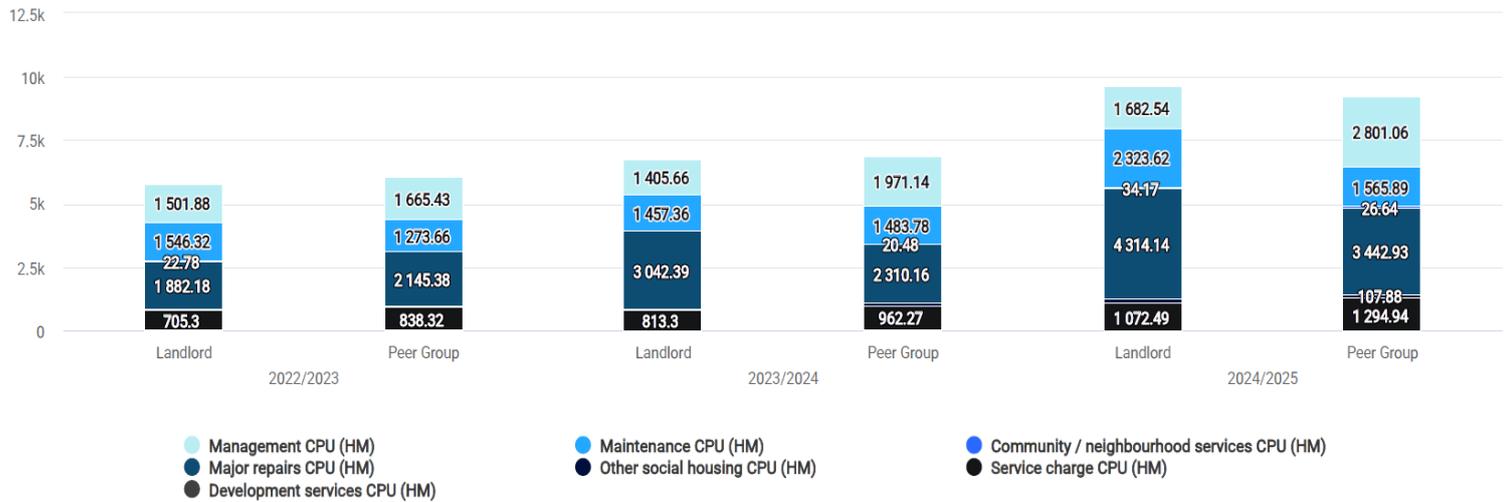
3.2.41 As a result of ongoing uncertainties, risks and sustained financial pressures, there is a continuous requirement for the fund to make savings in order to deliver a balanced financial position. Over the last five years, the HRA achieved £5.6m in recurring savings.

Year	2025/26	2024/25	2023/24	2022/23	2021/22
Savings	£0.7m	£0.8m	£3.1m	£0.5m	£0.5m

Benchmarking

3.2.42 Housemark carries out an annual performance summary and benchmarking analysis designed to help social landlords measure, compare, and improve their services. The below is the latest costs data available for Brent.

Social housing CPU (HM)

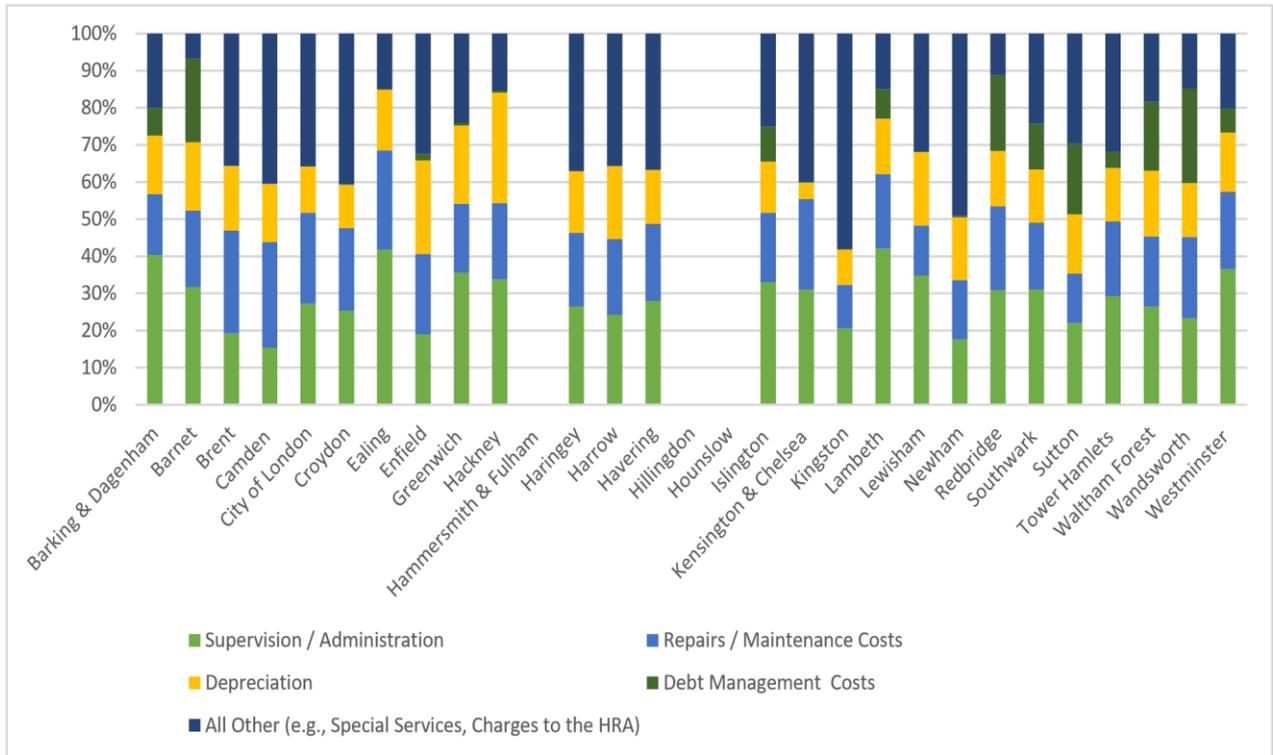


Category	24-25 LB Brent (£)	23-24 LB Brent	Median (£)
Social housing cost per property (£)	£9,651	£6,796	£9,535
Management (Overhead + Customer experience + Housing management + Maintenance management)	£1,683	£1,406	£2,700
└ Overhead	£734	£507	£1,580
└ Customer experience	£127	£115	£149
└ Housing management	£327	£348	£476
└ Maintenance management	£495	£436	£495
Maintenance (Responsive repairs + Void works + Building safety + Other planned works)	£2,324	£1,457	£1,909
└ Responsive repairs	£1,452	£713	£1,067
└ Void works	£202	£332	£230
└ Building safety	£670	£412	£507
└ Other planned works	£0	£0	£105
Service charge costs	£1,072	£813	£1,285
Development services	£0	£1	£19
Community/neighbourhood	£34	£22	£34
Major works (incl capital)	£4,314	£3,042	£3,106
Other	£224	£55	£10

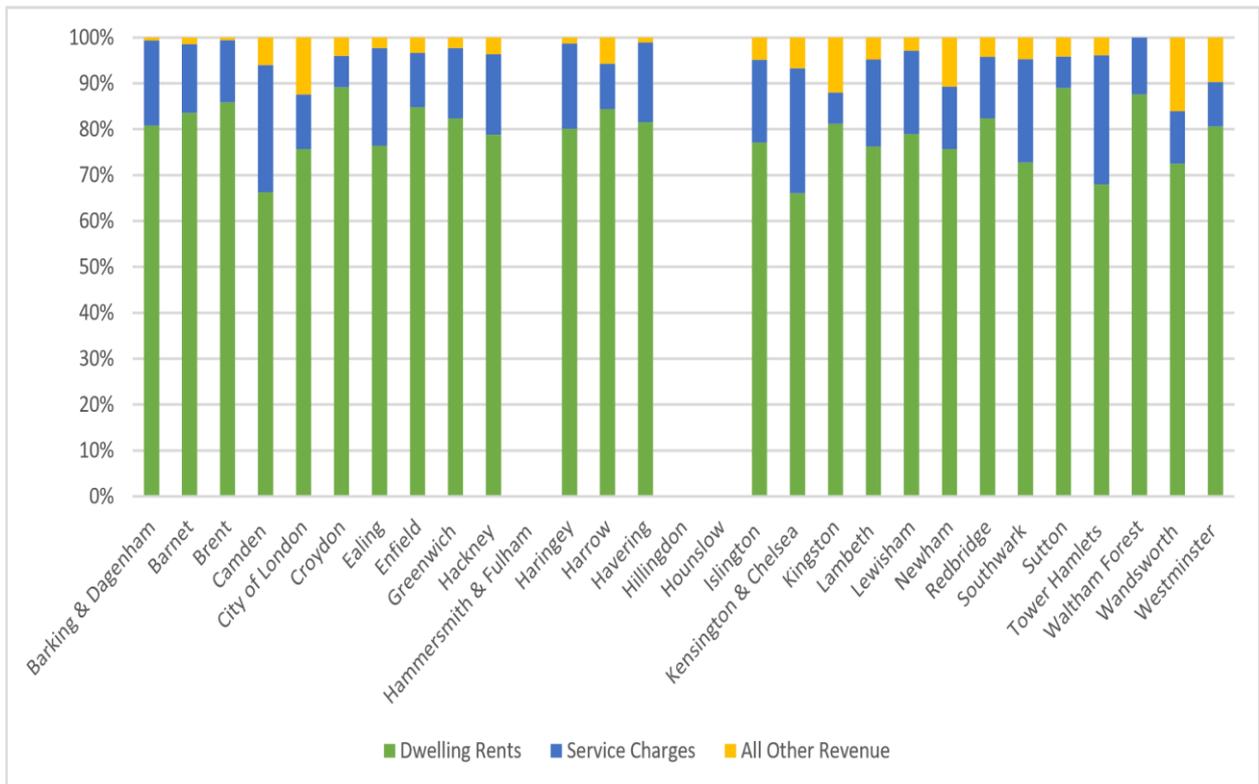
3.2.43 Currently 29 of London's 33 Boroughs have HRAs and London Councils carried out a survey last year where 26 boroughs shared their returns. The survey revealed that a number of HRAs are budgeting an annual deficit.

Local Authority	2025-26	2026-27	2027-28
Barking & Dagenham	1.3	-1.1	2.9
Barnet	-2.5	-4.7	-9.3
Brent	0.0	0.0	0.0
Camden	-0.9	-2.4	-4.0
City of London	-0.7	0.5	0.3
Croydon	-24.1	0.2	0.1
Ealing	-0.4	-2.2	0.1
Enfield	-8.8	-4.1	0.0
Greenwich	2.4	-3.7	0.2
Hackney	0.3	0.7	0.5
Haringey	0.0	0.0	0.0
Harrow	1.3	-0.1	-1.0
Havering	-1.0	-1.1	-6.5
Islington	11.2	10.3	9.9
Kensington & Chelsea	0.0	0.0	0.0
Kingston	1.0	0.0	0.1
Lambeth	-9.0	-10.3	-10.8
Lewisham	0.3	0.6	0.4
Newham	-1.4	-6.9	-2.5
Redbridge	-0.2	0.7	1.4
Southwark	0.0	0.0	0.0
Sutton	0.1	0.0	1.1
Tower Hamlets	5.5	5.8	6
Waltham Forest	-0.5	0.4	1.2
Wandsworth	12.3	-0.4	-9.6
Westminster	0.0	0.0	0.0
# of local authorities in deficit	11	11	7

3.2.44 Half of HRA expenditure is directed to supervision / administration and repairs / maintenance, with significant expenditure also directed to depreciation, special services, and charges to the HRA from other accounts.



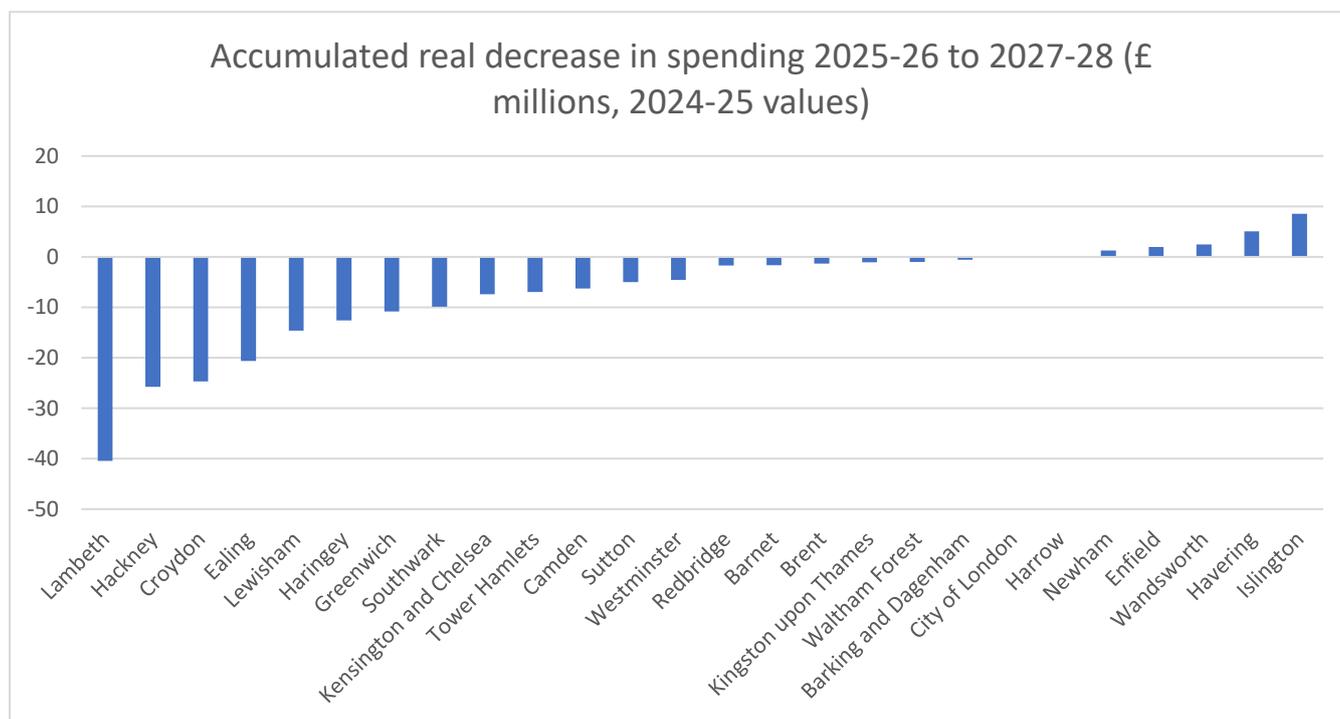
3.2.45 Over three quarters of HRA income was derived from dwelling rents, with significant revenue from service charges to leaseholders and other tenants.



3.2.46 A review of HRA budgets submitted showed many were based on conservative assumptions, with the potential to require significant deferred maintenance / rehabilitation.

Borough	YoY Increase			YoY Increase			YoY Increase		
	Repairs / Maintenance			Depreciation			Supervision / Management		
	2025-26	2026-27	2027-28	2025-26	2026-27	2027-28	2025-26	2026-27	2027-28
Barking & Dagenham	2.5%	2.0%	2.0%	2.8%	2.0%	2.0%	2.8%	2.0%	2.32%
Barnet	0.2%	18.3%	1.5%	3.0%	0.7%	1.1%	3.2%	1.5%	2.57%
Brent	4.4%	3.2%	2.6%	4.3%	4.2%	4.0%	4.7%	2.9%	3.67%
Camden	4.4%	5.0%	5.0%	0.0%	0.0%	0.0%	1.2%	2.0%	1.76%
City of London	2.3%	2.3%	3.7%	9.1%	4.2%	4.0%	2.1%	3.3%	3.24%
Croydon	2.1%	-17.1%	1.7%	2.7%	2.0%	1.9%	2.8%	2.2%	0.31%
Ealing	3.8%	-28.6%	1.7%	2.8%	2.0%	2.0%	-2.7%	1.9%	0.36%
Enfield	6.3%	5.4%	3.6%	7.3%	3.4%	4.9%	7.1%	2.9%	5.41%
Greenwich	3.7%	6.1%	4.7%	0.0%	3.6%	2.2%	-1.7%	2.2%	-0.71%
Hackney	1.1%	0.5%	2.7%	2.7%	3.8%	2.1%	-5.5%	1.6%	-0.76%
Haringey	-1.9%	2.0%	-6.9%	4.7%	4.9%	4.8%	4.2%	2.0%	1.76%
Harrow	3.0%	3.0%	3.0%	3.1%	2.9%	2.8%	2.3%	0.8%	2.04%
Havering	13.5%	2.8%	2.8%	2.4%	2.0%	2.0%	5.9%	2.0%	3.41%
Islington	1.6%	0.8%	3.0%	2.2%	1.9%	2.0%	7.8%	2.0%	4.85%
Kensington & Chelsea	-0.5%	-3.2%	-0.5%	0.0%	0.0%	0.0%	4.1%	2.0%	2.77%
Kingston	2.6%	1.3%	3.8%	3.2%	3.1%	3.0%	6.0%	2.8%	3.76%
Lambeth	-3.2%	1.7%	1.7%	6.6%	4.6%	3.8%	-4.0%	1.5%	-0.35%
Lewisham	1.6%	1.1%	6.4%	1.9%	1.8%	1.8%	-1.7%	-4.4%	-0.99%
Newham	6.2%	5.8%	4.2%	5.9%	6.8%	4.4%	6.0%	3.8%	5.46%
Redbridge	4.9%	5.9%	2.0%	6.8%	9.5%	1.4%	1.7%	2.9%	0.85%
Southwark	2.9%	2.5%	2.6%	0.8%	0.0%	0.0%	3.0%	2.5%	2.71%
Sutton	-1.5%	1.4%	2.7%	-1.1%	1.1%	1.1%	-3.5%	3.6%	-1.40%
Tower Hamlets	2.1%	2.0%	2.0%	1.7%	2.3%	1.7%	-2.0%	1.7%	0.48%
Waltham Forest	5.1%	3.0%	3.0%	4.0%	3.0%	3.0%	6.6%	3.0%	4.75%
Wandsworth	4.3%	2.3%	1.5%	4.6%	2.3%	2.7%	5.0%	3.0%	4.15%
Westminster	2.9%	2.4%	2.4%	3.7%	3.1%	1.7%	1.8%	1.8%	1.96%
Total (AVERAGE)	2.9%	2.4%	2.4%	3.7%	3.1%	1.7%	1.8%	1.8%	1.96%

3.2.47 A number of boroughs were planning real terms spending reductions in supervision and management, and repair and maintenance. Boroughs were projecting a real term reduction of 4% in spending in these areas across London. The accumulated real terms decrease in spending from 2024/25 to 2027/28 was estimated to be over £170 million across London. A number of boroughs were planning to make accumulated real terms reductions in spend that were greater than their expected HRA reserves by 2027, indicating that they must make these reductions to remain solvent.



4.0 Stakeholder and ward member consultation and engagement

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

5.0 Financial Considerations

5.1 This report sets out the financial position of the Housing Revenue Account (HRA) revenue budget. There are no direct financial implications arising as a result of this report.

6.0 Legal Considerations

6.1 Local housing authorities are required by section 74 of the Local Government and Housing Act 1989 to keep a HRA unless the Secretary of State has consented to their not doing so. The account must show credits and debits arising from the authorities' activities as landlord. The HRA identifies the major elements of housing revenue expenditure, such as maintenance, administration

and contributions to capital costs, and how they are funded by rents and other income.

- 6.2 Section 76 of the 1989 Act requires HRA budgets to be set on an annual basis in January or February before the start of the financial year. A local authority may not budget for an overall deficit on the HRA, and all reasonable steps must be taken to avoid a deficit.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 The Public Sector Equality Duty, as set out in section 149 of the Equality Act 2010, requires the Council, when exercising its functions, to have “due regard” to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, to advance equality of opportunity and foster good relations between those who have a “protected characteristic” and those who do not share that protected characteristic. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. The Council also internally recognises care experience and socio-economic status as protected characteristics.

- 7.2 The financial pressures outlined in this report have implications for residents who may be more affected by rising demand for repairs and maintenance, issues such as damp and mould, and the building safety and decarbonisation requirements identified. The report notes that investment plans must be approached cautiously, with flexibility to reprioritise or scale back schemes where necessary due to financial constraints. Clear and accessible communication with tenants about any changes to planned works is essential, particularly for residents with disabilities, older people, and families with young children, who may experience greater disruption or health impacts when repairs are delayed or when building safety or improvement works need to be adjusted.

- 7.3 Growing rent arrears and wider cost-of-living pressures also present a risk of worsening inequalities if not managed inclusively. Lower-income households and tenants with additional support needs may be disproportionately impacted by rising debts, making the Council’s continued focus on ethical debt recovery, tenant engagement and targeted financial assistance critical. As demographic shifts increase the number of residents requiring integrated housing, health and care support, the HRA’s long-term planning will need to remain responsive to ensure that services stay accessible, equitable and capable of supporting those with the greatest need.

8.0 Climate Change and Environmental Considerations

- 8.1 The council declared a climate and ecological emergency in July 2019 and pledged to do all reasonable in the council’s gift to aim for carbon neutrality by 2030 and to work with the government to achieve the national 2050 target. The borough’s Climate and Ecological Emergency Strategy also has ‘Homes, Buildings and the Built Environment’ as its third key theme. This theme has its own objective which is: *‘By 2030, as many homes and buildings in the borough*

as possible will be more energy efficient, be powered by renewable sources and be resilient to future adverse weather events caused by climate change – and we will do all in our gift to achieve an average rating of Energy Performance Certificate B in directly owned council stock’.

- 8.2 Emissions from all domestic properties in the borough (not just council housing) remains the highest single emission source within the borough boundary, with 38% of Brent’s total carbon emissions coming from homes. Unfortunately, retrofitting homes remains prohibitively expensive at scale. Our best estimate for retrofitting council housing stock up to an average is EPC B is that it would cost £60m, and it is likely with current inflationary pressure that this figure would be significantly higher.
- 8.3 To date, Brent has relied on securing external capital grant funding for retrofit works within our own stock, alongside utilisation of the council’s Carbon Offset Fund and integrating retrofit measures into existing asset management programmes. This has seen us retrofit 100 council properties as part of the government’s Social Housing Decarbonisation Scheme (phase 2.1) and recently secure funding for a retrofit project on 80 properties for two Tower Block schemes (The Oaks and Pharamond) via the Social Housing Fund. 1,568 council properties have also been retrofitted with at least one energy efficiency measure since the council declared a climate emergency in 2019.
- 8.4 The government has also recently announced £15bn for energy efficiency plans as part of the new Warm Homes Plan. Brent will be monitoring further announcements closely on opportunities to access potential capital funding under this plan to undertake further retrofit schemes within the council’s own stock.
- 8.5 Brent has also recently adopted its Climate Adaptation and Resilience Framework, which sets out under Priority 2 (Adapting Infrastructure, Buildings and the Built Environment) our aspirations to making Brent’s homes, buildings, infrastructure and public spaces more resilient to the impacts of climate change. Including improving and upgrading Brent’s highest risk homes and buildings to be resilient to extreme heat, flood, and drought. The document acknowledges that this is a long term ambition and will similarly likely be dependent on national and regional funding in order to drive this forward.

9.0 Human Resources/Property Considerations (if appropriate)

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

10.0 Communication Considerations

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

Report sign off:

Tom Cattermole

Corporate Director, Resident and Housing Services

 <p>Brent</p>	<p align="center">Resources and Public Realm Scrutiny Committee 24 February 2026</p>
	<p align="center">Report from the Corporate Director, Finance and Resources</p>
	<p align="center">Deputy Leader and Cabinet Member for Finance and Resources - Cllr Milli Patel</p>
<p>Complaints Analysis Report 2024-25</p>	
<p>Wards Affected:</p>	<p>All</p>
<p>Key or Non-Key Decision:</p>	<p>Non-Key Decision</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>Appendix A: Annual Complaints Report 2024 – 2025 – Cabinet September 2025</p> <p>Appendix B: ASC Complaints Annual Report 2024-25 (<i>Appendix A to the Cabinet Report</i>)</p> <p>Appendix C: CYP Complaints Annual Report 2024-25 (<i>Appendix B to the Cabinet Report</i>)</p> <p>Appendix D: Table Comparing to other London LAs (<i>Appendix C to the Cabinet Report</i>)</p> <p>Appendix E: Housing Management Service (HMS) Annual Complaints Performance and Service Improvement Report (<i>Appendix D to the Cabinet Report</i>)</p> <p>Appendix E (i): Housing Ombudsman performance report for Brent (<i>Part of Appendix D to the Cabinet Report / Appendix 1 to the HMS Annual Report</i>)</p>

	<p>Appendix E (ii): Code Self-Assessment- July 2025 <i>(Part of Appendix D to the Cabinet Report / Appendix 2 to the HMS Annual Report)</i></p> <p>Appendix E (iii): Spotlight on Knowledge Information Management <i>(Part of Appendix D to the Cabinet Report / Appendix 3 to the HMS Annual Report)</i></p> <p>Appendix E (iv): Spotlight on Attitudes Respect and Rights <i>(Part of Appendix D to the Cabinet Report / Appendix 4 to the HMS Annual Report)</i></p> <p>Appendix E (v): Brent Council Complaints Policy - July 2025 <i>(Part of Appendix D to the Cabinet Report / Appendix 5 to the HMS Annual Report)</i></p> <p>Appendix F: Compensation breakdown for last three years</p> <p>Appendix G: Correlation between issue types and outcomes of complaints by department 2024-2025</p> <p>Appendix H: Learning and improvements arising from complaints 2024-2025</p>
Background Papers:	N/A
Contact Officer(s): (Name, Title, Contact Details)	<p>Mariza Barros Complaints and Casework Manager Mariza.Barros@brent.gov.uk Tel: 0208 937 1381</p>

1.0 Executive Summary

- 1.1 This report provides a breakdown of complaints received by department and the top five issues of complaint for those respective departments. The report also provides a breakdown of the number of complaints that have been upheld, not upheld, partly upheld, rejected or withdrawn for each department.
- 1.2 Appendix A, the Annual Complaints report 2024-25 sets out complaint's performance in Brent Council for the period 1 April 2024 to 31 March 2025 and focuses on the nature of complaints and the learning they provide to inform Brent's future approach to service improvement.
- 1.3 Some complaints concerning Adult Social Care (ASC) and Children's Social Care are governed by separate statutory complaint procedures and individual summary reports have been provided for statutory complaints about these services in Appendices B and C respectively as part of the Annual Complaints Report 2024-25.

- 1.4 A comparison of the Council's performance with other London boroughs provided by the Local Government and Social Care Ombudsman has been provided as part of the annual complaints report in Appendix D.
- 1.5 Appendix E, the HMS Annual Complaints Performance and Service Improvement Report provides performance of Housing Management complaints from 1 April 2024 to 31 March 2025 as required by the Housing Ombudsman Service.
- 1.6 Appendix F provides a compensation breakdown for the last three years and Appendix G provides a correlation between the root causes and their issue types and outcomes of complaints.

2.0 Recommendation(s)

- 2.1 Scrutiny is asked to note Brent's performance in managing and resolving complaints.

3.0 Detail

3.1 Contribution to Borough Plan Priorities and Strategic Context

- 3.1.1 Complaints provide important learning points for the Council and allow us to inform the Council's priorities in many different ways. Through these learning points, we can make changes to achieve and further our priorities and move forward together.

Complaints provide an opportunity for the Council to understand issues and put things right, also ensuring that they do not reoccur.

- 3.1.2 Complaints are wide-ranging and dealt with across the Council. Owing to this, they touch upon all the priorities within the Borough Plan as detailed below:

- *The Best Start in Life* - Being able to deal with concerns at crucial stages of people's lives allows them to get the best start in life. Assisting our looked after children and children with special educational needs with issues that they may have, and providing advocacy to bring these issues forward to the Council will ensure that they are provided with the necessary support in life.
- *Thriving Communities* - Providing our residents with a route to complain and provide feedback not only encourages resident engagement but allows us to make improvements and inform change. In turn, by addressing their concerns and developing solutions that will benefit them, communities are given the opportunity to thrive.
- *A Cleaner, Greener Future* - The Council receive a number of complaints regarding environmental issues, which are reviewed and help us target specific areas. This also allows the Council to evaluate services that are being provided to ensure they meet our aspirations for a cleaner, greener future.

- *Healthier Brent* – Complaints regarding leisure services and our parks allow the Council to investigate and develop more initiatives to improve the health and wellbeing of our residents and those that visit Brent. During our complaints process we also signpost to relevant services that can assist our complainants, such as Mental Health services.
- *Prosperity and Stability in Brent* – Analysis of complaints received about housing needs is fundamental in terms of providing the tools and initiatives to support, empower and equip residents, and ensure long term stability.

3.1.3 Complaints also feed into some of the current strategies, priorities and plans set out for Brent, such as the Diversity and Inclusion Strategy 2024–2028. The Complaints Service ensures residents and service users are provided with access to the complaints procedure in line with the Public Sector Equalities Duty (PSED). The Digital Strategy 2022-2026 and the extended Digital Road Map 2026-28 also plays a pivotal role when looking at how users are accessing our services and how they are logging complaints. The Complaints Service have made it easier for users to log complaint casework, view the history of what they have logged, and access everything in one place.

3.2 Background

3.2.1 Scrutiny Committee has asked for a cover report on the themes and issues resulting from complaints and a comparison of compensation paid over the last three financial years. This is provided in appendix F.

Scrutiny Committee has also asked for a breakdown by department of the key issues and the outcomes of complaints that are investigated by the Council. This is provided in appendix G, with headlines summarised in this section.

3.2.2 Breakdown of complaints closed by department and issue type

A breakdown is provided below of the top five issues as recorded on the Council's complaints management system where available for each department. The Councils commissioned services' complaint issues have been incorporated in the overall data. On the issue of commissioned services, appendix B, the Adult Social Care Statutory Complaints Report, includes details relating to complaints received by ASC's Commissioning Contracting and Market Management. Appendix G provides further details for Housing Management Property Services and services provided by parking contractors.

Breakdown

Service Reform and Strategy – 165 stage 1 complaints

Adult Social Care responded to 164 stage one complaints. The top five issues were:

- Social Worker – 45
- Access and Information – 35

- Hospital discharge – 22
- Client Invoices - 12
- Care Package/Care Package Review – 11

Public Health received 1 stage 1 complaint.

Children, Young People and Community Development - 167 stage 1 complaints

Early Help and Social Care responded to 123 stage 1 complaints. The top 5 issues were:

- BFFD/MASH/NRPF (combined): 32
- Care Planning (combined): 12
- Looked after Children (combined): 11
- CYP LAC & Permanency (combined): 10
- East Locality Teams (combined): 7
- West Locality Teams (combined): 7

Education, Partnerships and Strategy responded to 44 stage 1 complaints. The top 5 issues were:

- Input form service: 22
- SEND Specialist Services (combined): 9
- Commissioning (combined): 5
- School Admissions (combined): 5
- CYP Commissioning (combined): 2

Finance and Resources - 18 stage 1 complaints.

Top issues were:

- Access & Facilities (combined): 6
- Insurance (combined): 4
- Acquisitions & Disposals (combined): 2
- Commercial Property (combined): 2

All other teams received 1 stage 1 complaint each.

Law and Governance - 10 stage 1 complaints

Top issue was:

- Legal Team – Brent legal services: 5

All other teams responded to 1 stage 1 complaint each.

Neighbourhoods and Regeneration - 192 stage 1 complaints

Public Realm responded to 148 stage 1 complaints. The top 5 issues were:

- HS&P (combined): 78 (mainly parking enforcement and permits)
- Highways Management (combined): 15
- Parks (combined): 8
- Grounds Maintenance (combined): 5
- NHM Multiple Issues: 5

Inclusive Regeneration and Employment responded to 31 stage 1 complaints. The top 5 issues were:

- Planning Enforcement (combined): 11
- Other: 4
- Inadequate Investigation or Analysis: 3
- Other Planning matters: 3
- South Kilburn Estates Regeneration: 2

Strategic Housing responded to 10 stage 1 complaints
Property and Assets responded to 3 stage 1 complaints

Resident and Housing Services - 1421 stage 1 complaints

Housing Services responded to 643 stage 1 complaints. The top 5 issues were:

- Repairs To My Property (Including Inspections): 139
- Outstanding Repairs (combined): 112
- Communal Repair: 64
- Housing Customer (combined): 54
- Anti - Social Behaviour: 46
- Damp and/or mould: 43

Resident Services responded to 428 stage 1 complaints. The top 5 issues were:

- Council Tax (combined): 312
- Libraries (combined): 26
- Debt Recovery (combined): 14
- Housing Benefits (combined): 9
- Local Welfare Assistance (combined): 8

Housing Needs and Support responded to 329 stage 1 complaints. The top 5 issues were:

- Homelessness application (combined): 222
- Offers of accommodation: 31
- Temporary Accommodation or Bed & Breakfast: 31
- Application for social housing waiting list: 20
- Banding: 12

Service improvements

- 3.2.3 Service areas use the information gathered from complaints to make service improvements. Once a complaint has been investigated any corrective actions that arise from the complaint are recorded on the Council's case management system to be tracked and monitored to completion. Officers are asked to upload any evidence so that it is readily available and can be retrieved when requested.
- 3.2.4 Appendix H provides more details on learning and improvements arising from complaints during 2024-2025.

Outcomes

3.2.5 Breakdown of Stage 1 complaint outcomes by Department

There are several outcomes to a complaint. A definition has been provided below for each outcome:

Upheld

If substantive evidence is found to support the complaint, then the complaint should be recorded as upheld.

Not upheld

If there is no evidence to support any aspects of a complaint made, the complaint should be recorded as not upheld.

Partly upheld

If a complaint is made about several issues and one or more, but not all, are upheld then the complaint should be recorded as partially upheld.

Withdrawn

Sometimes people choose not to pursue their complaint. This may be because the issues have since been resolved, for personal reasons or because of a change in circumstances.

Rejected

Complaints may be rejected if the issues are currently being dealt with through court proceedings, a safeguarding investigation is ongoing or if it has been more than twelve months since the issue occurred.

Department	Not Upheld	Partly Upheld	Upheld	Complaint Withdrawn / Not Pursued	Rejected	Grand Total
Housing Services	172	168	225	14	70	649

Resident Services	255	75	70	6	22	428
Housing Needs and Support	139	86	43	48	15	331
Adult Social Care	29	56	68	4	7	164
Public Realm	73	32	22	13	8	148
Early Help and Social Care	60	37	8	7	10	122
Education, Partnerships and Strategy	18	19	6	0	1	44
Inclusive Regeneration and Employment	22	7	2	0	0	31
Property & Assets	13	1	0	1	0	15
Community Development	7	0	3	1	1	12
Strategic Housing	1	4	3	2	0	10
Democratic Services	1	1	1	0	2	5
Law	5	0	0	0	0	5
Customer Access	4	0	0	0	0	4
Communications Insight and Innovation	2	0	1	0	0	3
Finance	0	0	1	2	0	3
Organisational Assurance and Resilience	2	1	0	0	0	3
Integration & Improved Outcomes	1	0	0	0	0	1
Public Health, Leisure & Parks	0	1	0	0	0	1

3.2.6 The table above shows the breakdown of **stage one** complaint outcomes.

3.2.7 A breakdown of the departments which received the highest amount of stage one complaints and their uphold rate is provided below:

- Housing Services received 649 Stage one complaints. Of these 649 complaints, 393 cases were upheld or partly upheld which means that in 61% of cases, some fault was found.
- Resident Services received 428 Stage one complaints. Of these 428 complaints, 145 cases were upheld or partly upheld which means that in 34% of cases some fault was found.
- Housing Needs and Support received 331 Stage one complaints. Of these 331 complaints, 129 cases were upheld or partly upheld which means that in 39% of cases some fault was found.

- Adult Social Care received 164 Stage one complaints. Of these 164 complaints, 124 cases were upheld or partly upheld which means that in 76% of cases some fault was found.
- Public Realm received 148 Stage one complaints. Of these 148 complaints, 54 cases were upheld or partly upheld which means that in 36% of cases some fault was found.
- Early Help and Social Care received 122 Stage one complaints. Of these 122 complaints, 45 cases were upheld or partly upheld which means that in 37% of cases some fault was found.
- Education, Partnerships and Strategy received 44 Stage one complaints. Of these 44 complaints, 25 cases were upheld or partly upheld which means that in 57% of cases some fault was found.
- Inclusive Regeneration and Employment received 31 Stage one complaints. Of these 31 complaints, 9 cases were upheld or partly upheld which means that in 29% of cases some fault was found.
- Property & Assets received 15 Stage one complaints. Of these 15 complaints, 1 case were upheld or partly upheld which means that in 7% of cases some fault was found.
- Community Development received 12 Stage one complaints. Of these 12 complaints, 3 cases were upheld or partly upheld which means that in 25% of cases some fault was found.
- Strategic Housing received 10 Stage one complaints. Of these 10 complaints, 7 cases were upheld or partly upheld which means that in 70% of cases some fault was found.

All other departments received under 10 complaints and therefore percentages will be skewed.

Department	Not Upheld	Partly Upheld	Upheld	Complaint Withdrawn / Not Pursued	Rejected	Grand Total
Housing Services	24	44	48	0	1	117
Resident Services	19	11	2	1	0	85
Housing Needs and Support	16	32	17	1	2	68
Adult Social Care	3	10	7	0	2	22
Public Realm	8	7	0	0	4	19
Early Help and Social Care	7	6	1	1	0	15
Inclusive Regeneration and Employment	6	3	0	0	0	9

Customer Access	5	3	1	0	0	9
Education, Partnerships and Strategy	2	5	1	0	0	8
Integration & Improved Outcomes	0	6	1	0	1	8
Strategic Housing	2	2	2	0	0	6
Property & Assets	3	0	0	0	0	3
Community Development	1	2	0	0	0	3
Environment and Leisure	2	1	0	0	0	3
Organisational Assurance and Resilience	1	1	0	0	0	2
Law	1	0	0	0	1	2
Regeneration, Growth & Employment	1	0	0	0	0	1
Democratic Services	0	1	0	0	0	1
Communications Insight and Innovation	0	0	1	0	0	1

3.2.8 The table above shows the breakdown of **stage two** complaint outcomes

3.2.9 A breakdown of the departments which received the highest amount of **stage two** complaints and their uphold rate is provided below:

- Housing Services received 117 Stage two complaints. Of these 117 stage two complaints, 92 cases were upheld or partly upheld which means that in 79% of cases some fault was found.
- Resident Services received 85 Stage two complaints. Of these 85 stage two complaints, 13 cases were upheld or partly upheld which means that in 15% of cases some fault was found.
- Housing Needs and Support received 68 Stage two complaints. Of these 68 stage two complaints, 49 cases were upheld or partly upheld which means that in 72% of cases some fault was found.
- Adult Social Care received 22 Stage two complaints. Of these 22 stage two complaints, 17 cases were upheld or partly upheld which means that in 77% of cases some fault was found.
- Public Realm received 19 Stage two complaints. Of these 19 stage two complaints, 7 cases were upheld or partly upheld which means that in 37% of cases some fault was found.

- Early Help and Social Care received 15 Stage two complaints. Of these 15 stage two complaints, 7 cases were upheld or partly upheld which means that in 47% of cases some fault was found.

All other departments received under 10 complaints and therefore percentages will be skewed.

3.2.10 The volume of complaints is increasing, and the growing use of Artificial Intelligence (AI) by residents is contributing to this rise. In 2024/25 the Council received 1983 stage 1 complaints and 346 stage 2 complaints. So far this year, from April 2025 to January 2026 the Council has received 3379 stage 1 complaints (an increase of 70%) and 506 stage 2 complaints (an increase of 46%). Many complainants are now using AI tools to help them draft complaints and better understand their rights, which has had a noticeable impact on how complaints are received and managed. The Council recognises this shift and is exploring how AI can positively reshape complaint handling by improving speed, accuracy, and overall insight. Evidence shows that AI can enhance responsiveness and accessibility through functions such as automated triage, digital assistants, and improved communication tools. However, these benefits must be balanced with strong governance to ensure responsible use. While AI offers substantial advantages for complaints management, its implementation must carefully address ethical considerations, including bias, data governance, and accountability.

4.0 Stakeholder and ward member consultation and engagement

4.1 The report was discussed at Cabinet and is on the agenda for scrutiny committee.

5.0 Financial Considerations

5.1 The details provided in the Annual Complaints Report 2024-25 (Appendix A) on compensation payments and in Appendix F – Compensation Breakdown for last three years reflect the monetary impact of not getting things right the first time as an organisation and the need to improve the customer experience thus minimising the financial penalties incurred by the Council.

5.2 The total amount of compensation awarded in 2024-2025 has increased by just over 56% compared to 2023-2024.

5.3 The total compensation awarded/offered in 2024/25 was £277,814 compared to £177,754 in 2023/24.

6.0 Legal Considerations

6.1 Complaints concerning Adult Social Care and Children’s Social Care fall under separate statutory complaint procedures. It is a legal requirement to produce annual reports for these areas, and these are included as part of the complaints annual report in appendices B and C with reference to the statutory frameworks for the management of these statutory complaints.

- 6.2 The Local Government and Social Care Ombudsman (LGSCO) or the Housing Ombudsman provide the final stage in the complaints process, where an individual has complained to the Council and remains dissatisfied with the outcome.
- 6.3 The LGSCO can investigate allegations of maladministration in connection with the exercise of a local authority's administrative function, allegations regarding a failure in a service which it is the local authority's function to provide, an allegation or an apparent failure to provide such a service pursuant to the Local Government Act 1974 as amended.
- 6.4 The Housing Ombudsman investigates complaints and resolves disputes involving the tenants and leaseholders of social landlords (housing associations and local authorities), as well as for voluntary members (private landlords and letting agents).
- 6.5 The Social Housing Regulation Act gave the Housing Ombudsman considerable new powers. The Housing Ombudsman is now able to order a landlord to evaluate a particular policy or practice to prevent service failure being repeated. Previously, these types of orders would have only been recommendations, which the landlord was not legally required to act upon (although it has always been the Council's policy to do so). The expanded powers enable the Ombudsman to require landlords to go beyond the scope of individual complaints and seek to address any wider issues.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 Under Section 149 of the Equality Act 2010, the Council has a duty when exercising its functions to have 'due regard' to the need:
- (a) to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited under the Act.
 - (b) advance equality of opportunity; and
 - (c) foster good relations between those who share a "protected characteristic" and those who do not.
- 7.2 This is the Public Sector Equality Duty (PSED). The 'protected characteristics' are age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, sex, and sexual orientation.
- 7.3 Although there have been no equality implications identified as a result of this report, the Council is improving the complaints system so that equalities data is captured, and data analysis can be used to identify issues that may disproportionately affect different equality groups.

8.0 Climate Change and Environmental Considerations

- 8.1 Not applicable

9.0 Human Resources/Property Considerations (if appropriate)

9.1 Not applicable

10.0 Communication Considerations

10.1 The Housing Ombudsman as well as the Local Government and Social Care Ombudsman issue spotlight reports to address thematic issues. The Complaints Service ensure that these reports and any other significant communications from the Ombudsmen are highlighted to the relevant services.

10.2 The Council continues to advertise its complaints procedure and policy on its website and in correspondence with residents.

Report sign off:

Minesh Patel

Corporate Director of Finance and Resources

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 Brent	Cabinet 8 September 2025
	Report from the Corporate Director of Finance and Resources
	Lead Member – Deputy Leader, Cabinet Member for Finance & Resources (Councillor Milli Patel)
Complaints Annual Report 2024 – 2025	

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:	Four Appendix A: Adult Social Care Complaints Appendix B: Children’s Social Care Complaints Appendix C: Local Government and Social Care Ombudsman performance comparison with other London boroughs Appendix D: HMS Annual Complaints Performance and Service Improvement Report
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Amira Nassr Deputy Director Democratic & Corporate Governance 0208 937 5436 amira.nassr@brent.gov.uk

1.0 Executive Summary

- 1.1 This annual report sets out complaints performance at Brent Council for the period 1 April 2024 to 31 March 2025 and focuses on the nature of complaints and the learning they provide to inform Brent’s future approach to service improvement.
- 1.2 Complaints concerning Adult Social Care (ASC) and Children’s Social Care are governed by separate statutory complaint procedures and individual summary reports have been provided for these services in **Appendices A and B** respectively.

- 1.3 A comparison of the Council's performance with other London boroughs provided by the Local Government and Social Care Ombudsman has been provided in **Appendix C**.
- 1.4 The report also contains in **Appendix D** the Council's Housing Management Service Annual Complaints Performance and Service Improvement Report for 2024/25 which is now a requirement of the Housing Ombudsman's Complaint Handling Code.

Ombudsman assessment

- 1.5 Brent's complaint performance continues to be positively assessed by the Local Government and Social Care Ombudsman (LGSCO):

Independent, external assessment of the quality of Brent's complaint performance is provided by the relevant Ombudsman. Sections 4.21 to 4.57 of this report and Appendix C provide detailed information about this. Brent continues to perform well against some key measures. The LGSCO carried out 24 detailed investigations into Brent complaints in 2024/25, of which 21 were upheld. The figures are the same as last year and only 4% higher than similar authorities. When adjusting this metric to consider Brent's population, this is 6.1% upheld decisions per 100,000 residents. The average for authorities of this type is 9.1% upheld decisions per 100,000 residents. Significantly, in seven of these 21 upheld cases (33% of cases), the LGSCO concluded that Brent had already satisfactorily remedied the complaint within the Council's complaints procedure. This compared favourably with Brent's performance against this metric in 2023/24 and also compared favourably to a 12% rate for similar authorities in 2024/25.

The LGSCO also noted that Brent complied with 100% of the remedies proposed by their complaint investigations. This demonstrates that Brent is embedding learning identified by Ombudsman investigations.

Learning and improving from complaints

- 1.6 Individual complaint investigation and the reporting and analysis of wider trends all highlight key learning points. For example, the section of this report on service improvements (4.20) highlights two key learning points for improving the service offered to homeless applicants within the extremely challenging context of the ongoing housing crisis. One key learning point is the importance of ensuring that homeless applicants are informed of their right to request a suitability review at the appropriate time if they consider their accommodation to be unsuitable. A second key learning point is issuing licence agreements for emergency accommodation in a timely manner and providing information for working homeless applicants on how to pay rental charges at the earliest possible stage in the homelessness assessment process. This ensures that homeless applicants' expectations are properly managed. It also enables the Housing Needs Service to maximise income collection.

The Housing Management Service commenced a major review of its complaint handling during 2024/25. One initiative arising from this review is the promotion of learning reviews. The Housing Ombudsman, which decides complaints relating to

the Council's role as a landlord, sometimes orders the Housing Management Service to undertake a learning review as one of the outcomes of an upheld complaint investigation. The purpose of learning reviews are to fully embed learning from complaints within the service. The Housing Management Service is trialling a more proactive approach to learning reviews, starting by initiating one each time the Council is notified that the Ombudsman is investigating a complaint, rather than waiting to be ordered to undertake one. If this trial proves successful, it can be rolled out more widely across the Council.

Capturing compliments and positive feedback from residents and service users

- 1.7 The complaints data outlined in this report provides extensive information about residents' and customers' dissatisfaction with services and the Council's efforts to resolve this dissatisfaction. Section 4.58 of this report provides data about and some examples of compliments received. This is another, more positive side of the story, where residents and customers take the trouble to proactively praise and express gratitude for what the Council does, outside of the standard consultation and feedback processes. Efforts have been made to encourage all service areas within the Council to ensure that ad hoc compliments are recorded on the relevant database. There has been a slight increase in the number of recorded compliments in 2024/25 compared to the previous year. Changes will be made to the online forms through which residents interact with the Council to make it easier for them to log a compliment through this channel from 2025/26 onwards.

2 Recommendation(s)

- 2.1 Cabinet is asked to note Brent's performance in managing and resolving complaints.
- 2.2 Cabinet is asked to note and review Brent's self-assessment against the Housing Ombudsman's Complaint handling Code in Appendix D.
- 2.3 Cabinet is asked to approve to progress this report to the relevant Scrutiny committee.

3 Cabinet Member Foreword

- 3.1 Complaints provide important learning points for the Council and allow us to inform the Council's priorities and improve on service delivery. Complaints are wide ranging and dealt with across the Council, from assisting our looked after children to acting on environmental and social care concerns, right through to improving our Housing Needs service. Alongside adhering to a number of strategies, dealing with complaints touches upon all the priorities within the Borough Plan as detailed below:
- *The Best Start in Life* - Being able to deal with concerns at crucial stages of people's lives allows them to get the best start in life. Assisting our looked after children and children with special educational needs with issues that they may have, and providing advocacy to bring these issues forward to the Council will help to ensure that they are provided with the necessary support in life.

- *Thriving Communities* - Providing our residents with a route to complain and provide feedback not only encourages resident engagement but allows us to make improvements and inform change. By addressing their concerns and developing solutions that will benefit them, communities are given the opportunity to thrive.
- *A Cleaner, Greener Future* - The Council receives a number of complaints regarding environmental issues, which are reviewed and help us target specific areas of improvement. This also allows the Council to evaluate services to ensure they meet our aspirations for a cleaner, greener future.
- *Healthier Brent* – Complaints regarding leisure services and our parks allow the Council to resolve challenges and develop more initiatives to improve the health and wellbeing of our residents and those that visit Brent. During our complaints process we also signpost to relevant services that can assist our complainants, such as Mental Health services, where appropriate.
- *Prosperity and Stability in Brent* – Analysis of complaints received about the Housing Needs and Property and Assets Service, for example, helps to shape the tools and initiatives to support and empower residents, and contributes to long term stability.

3.2 Points of note for the period 1 April 2024 to 31 March 2025 include housing-related complaints constituting almost half of all Stage 1 cases, an improvement in the timeliness of complaint responses across all stages, and an increase in the number of compensation cases, which the Council plans to enhance its monitoring of to reduce unnecessary escalations.

3.3 As ever, the Annual Complaints Report acts as a crucial document for the Council to reflect on its duties to Brent’s residents, identifying particular points of strain and where service areas may require further attention or resource.

4.0 Background

4.1 The Council has three different processes for managing complaints:

- a two stage corporate complaints process;
- a two part adult statutory complaints process; and
- a three stage children’s statutory complaints process.

4.2 The complaints data and information provided in this report is based on information recorded on the Council’s Resident Feedback and Complaints (RFC) system.

4.3 Brent Council has a clear, corporate commitment to a positive customer experience. The Council is committed to its Customer Access Strategy which sets out what Brent residents should expect from staff, including service standards in relation to complaints. The aim is for the organisation to be sensitive to customer needs, prioritise communication and provide clear, accurate and current information.

4.4 In this context, the Council prioritises customer complaints to ensure that these are dealt with appropriately and efficiently. The central Complaints Service monitors the numbers of complaints received and the quality and timeliness of responses. The Complaints Service works closely with service areas to ensure that corrective actions are put in place and learning from complaints is built into service

design. There is a strong commitment to improve responses and reduce the number of complaints.

4.5 The key statistical headlines from complaints performance in 2024/25 are as follows:

- Housing repairs, Council Tax and homeless applications are again the top three concerns for customers.
- The number of Brent Stage 1 complaints (corporate and statutory) has increased by 98 complaints (↑ red) compared to last year.
- The number of Brent Stage 2 complaints (corporate and statutory) has increased by 12% (up by 37 cases) (↑ red) compared to last year.
- There were 21 Local Government and Social Care Ombudsman (LGSCO) cases upheld against Brent in 2024/25, which is the same as last year. (- amber).
- The Ombudsman's annual performance report for Brent for 2024/25 noted that 33% of Brent complaints that were upheld by the Ombudsman were found to have already been satisfactorily remedied within the Council's complaints procedure, compared to 12% for similar authorities. (↑ green)
- The total number of cases where compensation was offered or awarded has increased by 34% (up by 121 cases) compared to last year. The total amount of compensation has also increased to £277,814. Compared with the previous year, this is a significant increase of 56%. (↑ red)
- There have been increases in the timeliness of corporate and statutory complaint responses across the board when compared to 2023/24. (↑ green)
- The largest increase in timeliness was 10%, in relation to statutory first stage complaints. This increase was however from a lower base than the timeliness of other areas. (↑ green)

Volume of Complaints received

4.6 The chart below shows the volume of corporate and statutory complaints received at Stage 1, Stage 2 and Stage 3 over the past 3 years. The key points to note are:

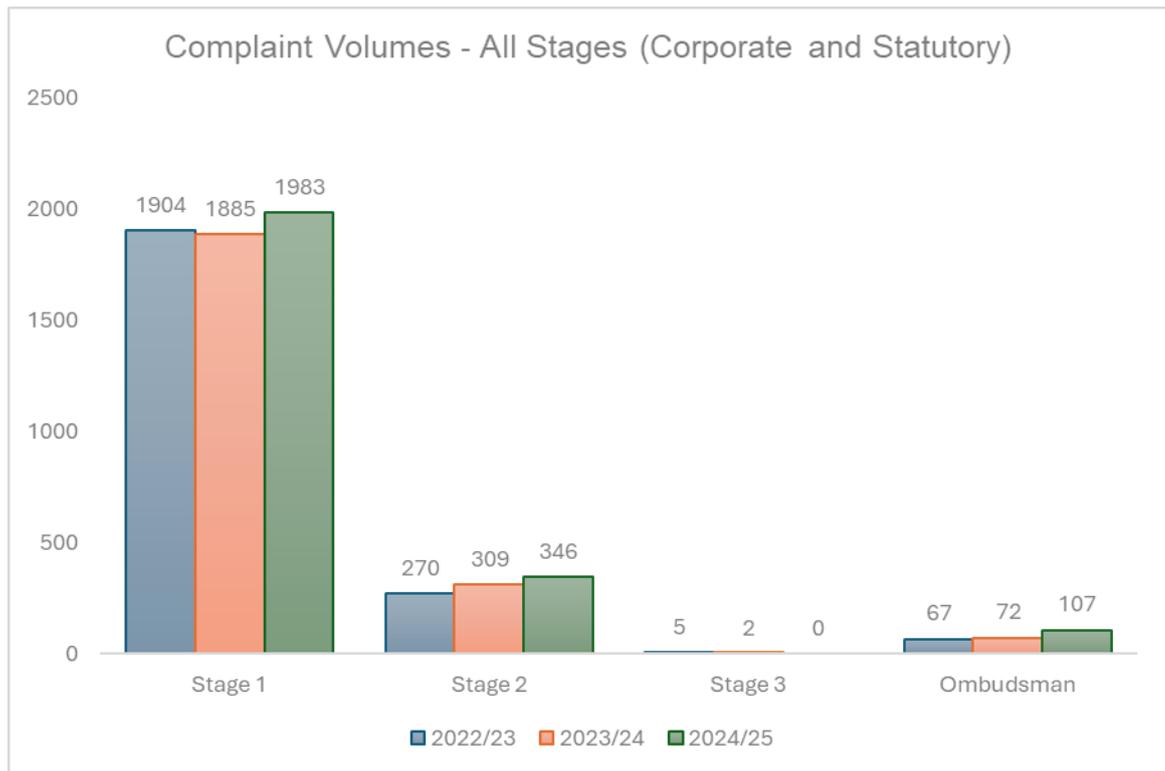
- In 2024/25 Brent received 1,983 Stage 1 complaints (corporate and statutory). This is an increase of 98 complaints compared to the previous year.
- In 2024/25 Brent received 346 Stage 2 complaints (corporate & statutory). This is an increase of 37 complaints compared with last year.
- There were no Stage 3 Review Panels convened during 2024/25, compared to the two convened in 2023/24. This is partly due to efforts made by the Statutory Complaints Manager to mediate CYP complaints to prevent them escalating to this stage. Quite apart from any compensation awarded, the administrative cost of convening a Stage 3 Review Panel is several thousand pounds, so the fact that there were none in 2024/25 is in several respects a positive outcome for the Council.
- The number of Ombudsman decisions has risen in 2024/25. The number has increased from 72 in 2023/24 to 107 in 2024/25.

4.7 The majority of stage 1 complaints for 2024/25, 49% of the total, related to housing services. Of the 1,983 stage 1 complaints received in 2024/25, 968 related to the

Housing Management Service, Housing Needs Service and PHS. This is an increase from 2023/24 which saw 864 complaints related to housing services.

4.8 Stage 2 escalations increased by 37 complaints compared to the previous year. The increase was mainly in the Housing Needs Service with 20 additional escalations to stage 2 when compared to 2023/24.

4.9 More Ombudsman enquiries were received in 2024/25 compared to the previous year. The increase was mainly in Housing Ombudsman enquiries received. More detailed information relating to the increase can be found in Appendix D.



Timeliness of Complaints

4.10 The table below highlights the percentage of complaints closed on time. There have been increases in the percentage of complaints closed on time across the board. The timeliness of stage 1 corporate complaints closed on time has improved slightly, as has the timeliness of stage 2 corporate and stage 2 statutory complaints. There has been a significant increase in the timeliness of stage 1 statutory complaints, from 77% in 2023/24 to 87% in 2024/25, up by 10%. This is partly the result of some sustained work by the Complaints Service, such as training and targeted support to managers, to support ASC and CYP to improve performance in this area.

Year	Brent - % of Cases Closed on Time			
	Stage 1 - Corporate	Stage 1 - Statutory	Stage 2 - Corporate	Stage 2 - Statutory
2022-23	96%	85%	98%	72%
2023-24	95%	77%	96%	90%

2024-25	96%	87%	98%	91%
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Complaint Outcomes

4.11 The percentage of cases upheld or partly upheld for stage 1 corporate and statutory complaints as well as stage two corporate complaints has remained at broadly the same level as 2023/24. There was a 1% decrease in the percentage of stage 1 corporate complaints upheld this year, a 2% increase in the percentage of stage 1 statutory complaints, and a 3% increase in the percentage of stage 2 corporate complaints upheld this year. This suggests a longer-term consistency in decision-making in these three areas of the complaints procedure.

There has been a significant increase of 28% of stage 2 statutory complaints upheld or partly upheld, 84% compared to 56% in 2023/24. This is closer to the level of the previous year, 2022/23, which was 75%.

Year	Brent - % of Cases Upheld or Partly Upheld			
	Stage 1 - Corporate	Stage 1 - Statutory	Stage 2 - Corporate	Stage 2 - Statutory
2022-23	39%	61%	58%	75%
2023-24	47%	65%	60%	56%
2024-25	46%	67%	63%	84%

Complaints not accepted

4.12 The Council also records the types of complaints made that were not accepted. In 2024/25, 239 complaints were not accepted at stage 1 of the complaints process. This included 224 corporate complaints, 7 ASC statutory complaints and 8 CYP statutory complaints. Of the complaints not accepted, 98 complaints were withdrawn/not pursued and 141 were rejected. The types of complaints not accepted vary but the top three most common case types were related to homelessness applications, housing repairs and Council Tax. Homelessness applications and housing repairs are two of the top concerns raised by residents. The high number of complaints received regarding these issues is reflected in the number of cases not accepted. It is also relevant to note that homeless applications and some Council Tax complaints have their own appeal procedures so another reason why some of these complaints were rejected is because they were more appropriately dealt with through these alternative routes.

4.13 The most common reason recorded for complaints being rejected or withdrawn/not pursued was that the complaint had already been investigated or was a duplicate request. This applied to 94 stage 1 complaints. Other reasons for stage 1 complaints not being accepted were: the complaint was about a non-Council related service; that the customer has the right of appeal under a different process; the complaint was out of time; the complaint was about a Legal or HR issue; the complainant not having permission to act on behalf of the service user.

Compensation

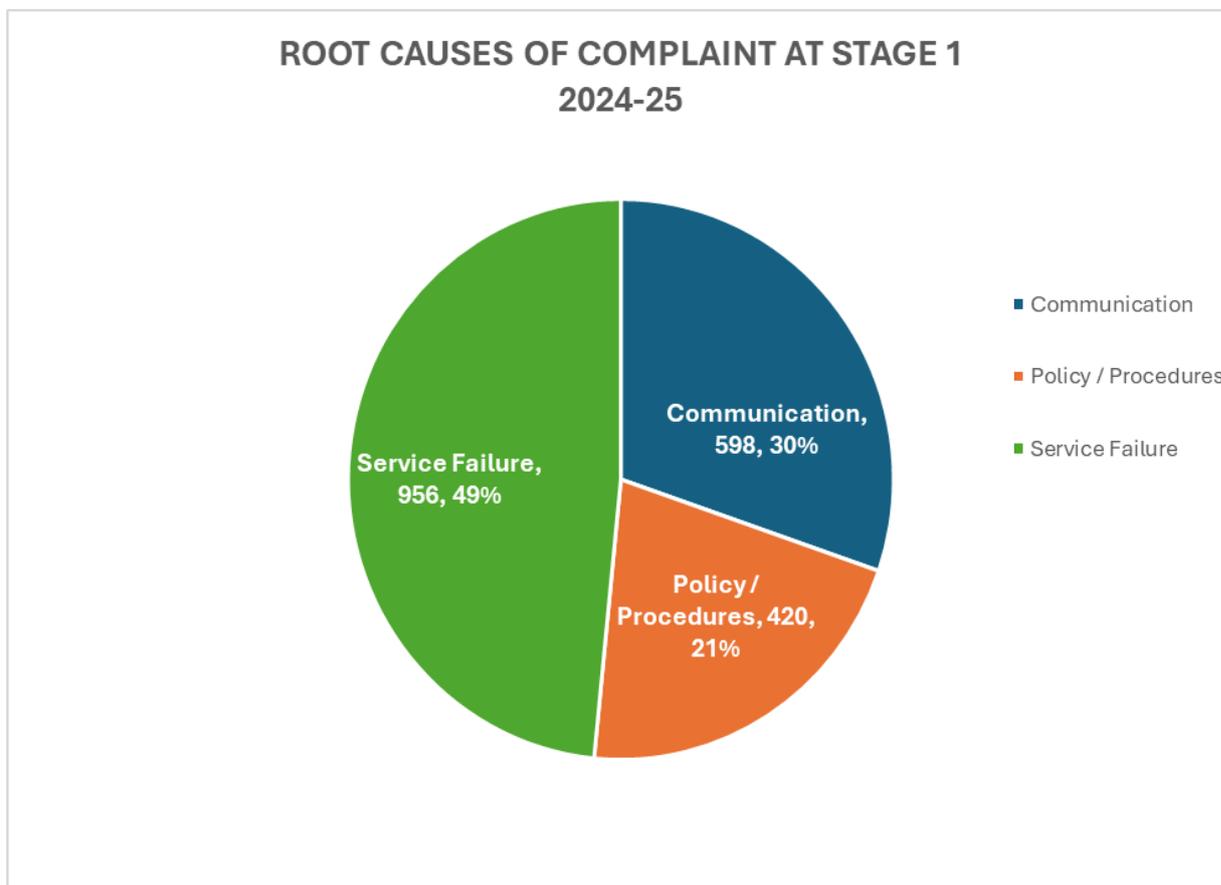
- 4.14 The table below shows the total amount of compensation paid in Brent at all stages of the corporate and statutory process, including Ombudsmen cases. Compensation can be offered at any stage of the complaints process. The total number of cases where compensation was awarded or offered has increased by 34% (an increase of 121 cases) compared to last year and the amount of compensation awarded for each case on average has increased by £82, which is a 16% increase.

Year	All Brent		
	Cases	Total Comp.	Avg / Case
2022-23	263	£165,827	£631
2023-24	353	£177,754	£504
2024-25	474	£277,814	£586

- 4.15 Compensation can be awarded for time and trouble, distress, as a goodwill gesture, or in the form of a refund, reimbursement, or the offset/waiving of arrears. The majority of compensation in 2024/25 was offered at stage 2 of the Council's complaints process with £164,302 being offered at this stage. At stage 1, £83,812 was offered, and £31,350 was awarded across the Council at the Ombudsman stage. Just under £70,000 of the compensation awarded involved credits to debts the complainants owed to the Council (e.g. Council Tax arrears, rent arrears, social care charges) rather than a direct payment. The highest amounts of compensation paid out in individual cases were both for Housing Needs complaints. One of the cases involved an award of £12,800. The second involved clearing just over £12,000 of emergency accommodation rent arrears.
- 4.16 Overall, the Housing directorate accounted for 81% of all the compensation awarded (£225,515). This was averaged at £500 per case and was disbursed in 451 cases. The most significant increase in compensation paid, which has had an impact upon the overall amount of compensation paid by the Council, was for the Housing Needs Service. The Housing Needs Service paid a total of £36,645 compensation at all stages of the complaints procedure in 2023/24. This increased by a factor of 2.7 to £99,498 in 2024/25. Six cases alone accounted for £54,000 of the compensation paid by the Housing Needs Service. The underlying reason for this is the ongoing housing crisis, with some families unavoidably staying for too long in unsuitable accommodation. This is therefore not primarily indicative of a failing on the part of the Council but rather a London-wide shortage of suitable and affordable accommodation. Nevertheless, for 2025/26 the Complaints Service will work closely with the Housing Needs Service to identify cases where more careful monitoring of actions promised at the first stage of the complaints procedure is needed, to ensure that they are promptly implemented, which may prevent some unnecessary escalation and therefore unnecessary compensation payments at the second stage.

Root Causes of Complaints

4.17 Root causes of complaints are categorised by the Council under the following types: Service failure; communication; policy/procedures. As shown in the pie chart below, 49% of complaints closed at stage 1 were categorised under service failure in 2024/25. Issues with communication constituted 30% of complaints whilst dissatisfaction with policy/procedure comprised 21% of all complaints closed.



4.18 Housing repairs, including surveyor inspections, Council Tax, and homelessness applications were the central issues that made up residents' concerns. The Housing Management Service carried out nearly 40,000 repairs in 2024/25. This means that there is likely to be a correlation between the large number of repairs carried out and the relatively high number of complaints received.

4.19 In 2024/25, a significant number of complaints were received relating to Council Tax. This is largely due to the rising pressures of the cost of living and some residents struggling to keep up with payments. Additionally, the Council received a significant number of complaints relating to homeless applications, especially at the second stage of the complaint procedure, up from 42 in 2023/24 to 58 in 2024/25, a 38% increase. This also stems from the increased cost of living, particularly rental costs, and the wider housing crisis.

Service Improvements implemented

4.20 Partly as a result of complaints received by Brent Council, many service improvements have been implemented. These improvements include:

- To prevent neighbour disputes, the Housing Management Service introduced a more robust process for checking that the status of gardens are clarified before new tenants sign their tenancy agreements to ensure that correct information is provided (e.g. whether the garden is for the tenant's sole use, shared with another tenant, communal, etc.).
- The Housing Needs Service reviewed its procedure for issuing licence agreements for emergency accommodation and providing information for working homeless applicants on how to pay rental charges for this type of accommodation to minimise any future uncertainty on what or how to pay.
- Several complaints highlighted the importance of the Housing Needs Service notifying homeless applicants, as soon as possible when appropriate, that after the main homeless duty is accepted they can request a formal review of the suitability of their bed and breakfast/hostel accommodation if they consider it unsuitable for any reason. The Housing Needs Service will of course seek to address and resolve any suitability issues that are raised in the first instance, but the review process is the correct route through which to address any fundamental dissatisfaction relating to suitability of accommodation, although this can create pressures for the reviews team in terms of increased caseloads.
- The Council Tax team reviewed its procedure to ensure that appropriate checks are undertaken to identify cases where there may be legitimate outstanding queries that need to be answered before a summons is issued.
- The Electoral Services team worked with Customer Services, and updated the website, to provide residents with more detailed information when they enquire about postal voting, to ensure they are entirely clear on the process.
- The Registration and Nationality Service further refined its approach to asking parents necessary but potentially sensitive questions when births are registered.
- Customer Service officers have been provided with an updated list of properties managed by Hyde Housing on behalf of the Council to ensure that these Council tenants are correctly advised when they call or email the Council with enquiries.

Local Government & Social Care Ombudsman (LGSCO) Decisions and Learning Points

4.21 The Local Government and Social Care Ombudsman (LGSCO) provides an Annual Review report every year which focusses on the Council's performance in relation to complaints that have been referred to it. It also publishes data comparing Brent's complaint performance to that of other London boroughs.

4.22 In summary:

- The number of referrals made to the LGSCO for Brent was 154 in 2024/25, an increase of 13 compared to last year. The borough with the highest number of referrals in 2024/25 was Lambeth with 309 referrals, and the lowest was City of London with 7 referrals.
- The LGSCO decided the same number of detailed investigations into Brent complaints referred to them as last year when 24 detailed investigations were carried out.

- Brent's upheld rate out of the 24 investigations is 88% (21 out of 24), the same as last year. Brent was joint 11th highest with Newham, Lewisham, Bromley, Islington and Kingston Upon Thames out of all London boroughs on this performance indicator. Barking and Dagenham had the highest uphold rate with 95% of cases requiring a detailed investigation, upheld.
- Comparing the number of actual cases upheld by the Ombudsman, Brent were joint 16th lowest with Waltham Forest out of all London Councils. Lambeth had the highest number of cases with 58 upheld.
- To provide a better picture of performance compared to other London boroughs, the LGSCO have provided an adjusted metric to measure uphold rate by calculating the number of upheld cases per 100,00 residents. When reviewing this metric to consider Brent's population, Brent had 6.1% of upheld decisions per 100,000 residents which puts the Council in 9th lowest compared to other Councils. The average for authorities of this type is 9.1% upheld decisions per 100,000 residents. Greenwich had the lowest rate at 3.4 and Haringey had the highest rate at 20.2.
- Of the 24 investigations completed for Brent:
 - three complaints were not upheld;
 - of the remaining 21, fourteen complaints were upheld with further recommendations; and the remaining seven were upheld, but the Council had already implemented its own recommendations which had been accepted by the LGSCO as a suitable remedy, or there were no further recommendations made by the Ombudsman.
- The Ombudsman's annual performance report for Brent for 2024/25 noted, positively, that the 33% of Brent complaints that were upheld by the Ombudsman which were found to have already been satisfactorily remedied within the Council's complaints procedure (the seven out of 21 noted above), compared favourably to 12% for similar authorities.
- Compliance with the Ombudsman's recommendations remains at 100%.

LGSCO Volumes and Outcomes

- 4.23 There were 154 enquiries and complaints referred to the Ombudsman in 2024/25 which is 13 enquiries higher than the 141 enquiries made the previous year. In 2024/25 the LGSCO made decisions on 138 cases which is one less than the previous year. Of the 139 cases decided in 2024/25 only 24 cases required a detailed Ombudsman investigation. This is the same number of cases that required a detailed investigation in 2023/24. 21 of the cases investigated in 2024/25 were upheld and 3 were not upheld. This is again the same as in 2023/24.
- 4.24 LGSCO categories of cases not taken forward for investigation include: 'advice given'; 'referred back for local resolution'; 'incomplete or invalid'; and 'closed after initial enquiries'.

4.25 The statistics on LGSCO outcomes below show broad consistency, compared to last year, in the number of complaints which the Ombudsman referred back to the Council to consider within its complaints procedure or which they closed after initial enquiries. The table below shows a 4-year comparison of LGSCO outcomes of Brent Council cases:

Year	LGSCO Outcomes						Total
	Not upheld	Upheld	Advice given	Referred back for local resolution	Invalid or incomplete	Closed after initial enquiries	
2021-22	11	22	8	39	7	31	118
2022-23	7	22	6	25	5	29	94
2023-24	3	21	11	46	11	47	139
2024-25	3	21	13	46	7	48	138

LGSCO Upheld Cases

4.26 There were 21 cases upheld against Brent in 2024/25 in the following services:

- Housing – 9
- Adult Social Care – 4
- Education and Children Services – 3
- Healthy Streets and Parking – 2
- Council Tax – 2
- Regulatory Services - 1

4.27 The Ombudsman was satisfied that the Council had successfully implemented its recommendations to remedy these complaints, achieving a 100% compliance rate.

4.28 This is an encouraging outcome and shows that the Council is complying with remedies set by the Ombudsman.

4.29 A summary of the 21 cases upheld by the LGSCO for each area is provided below.

Housing

4.30 Complaints concerning the Housing Management Service are referred to the Housing Ombudsman and are not included in the summary in this section.

4.31 Nine complaints relating to other housing services were upheld after being submitted to the LGSCO, which is an increase of two complaints compared to last year. Eight of these complaints related to the Housing Needs Service. One related to Private Housing Services (the Ombudsman categorised the PHS complaint under Adult Care Services but we have included it under housing services to reflect the Council's structure).

- 4.32 In four of the upheld Housing Needs Service cases, a remedy had already been provided during the Council's complaints process, therefore the LGSCO made no further recommendations. The five cases where an apology and additional actions and/or compensation were recommended are detailed below.
- 4.33 Case one - The Ombudsman concluded that PHS caused a complainant avoidable confusion and frustration because it did not include widening of his lounge and kitchen thresholds in his Disabled Facilities Grant (DFG) specification, despite these works having been agreed. The Ombudsman recommended an apology for this.
- 4.34 Case two - The Ombudsman concluded in this case that the Council remedied the individual injustice to the complainant caused by delays in progressing his homeless application. However, the Ombudsman further recommended that Housing Needs Service officers should be reminded that the homeless prevention duty is automatically triggered when a homelessness applicant receives a section 21 notice.
- 4.35 Case three - The Ombudsman concluded that poor advice by a Housing Needs Service officer, in telling a family that if they moved to emergency bed and breakfast accommodation they could be sharing facilities indefinitely, resulted in the family declining to go to emergency accommodation and therefore staying much longer in their unsuitable accommodation than they otherwise would have done, until they were eventually rehoused in January 2024. The Ombudsman recommended £3,350 additional compensation and an apology.
- 4.36 Case four - The Ombudsman concluded that the Council had already addressed the issue of the complainant and her family staying too long in unsuitable bed and breakfast accommodation and had paid compensation that accorded with the Ombudsman's guidance. However, the Ombudsman also noted that the complainant had not been told of her right to request a review at every point where this was appropriate. The Ombudsman therefore awarded £200 additional compensation, recommended an apology, and asked the Housing Needs Service to remind officers to ensure that they inform homeless applicants when decisions can be reviewed.
- 4.37 Case five - The Housing Needs Service took longer than it should have done to complete a review of an applicant's Locata banding, although the eventual outcome was that her banding remained the same. The Ombudsman recommended an apology, £250 compensation and a reminder to officers of the importance of completing reviews within a reasonable timescale. At the same time, the Ombudsman accepted that the Housing Needs Service had recruited staff in order to improve its review response times.

Adult Social Care

- 4.38 The Ombudsman upheld four ASC complaints. In one upheld ASC case, the Ombudsman concluded that a reasonable remedy had already been provided by the Council, therefore the LGSCO made no further recommendations.
- 4.39 In the second upheld ASC complaint, a mother complained about various issues regarding her son's supported living placement. The Ombudsman found some fault

and recommended the following actions: apologies to both mother and son; £100 time and trouble compensation to the mother; completion of a financial mental capacity assessment and best interest decision for the son; a reminder to relevant officers of their duties in safeguarding adults; a reminder to relevant officers of the importance of effective complaint handling.

- 4.40 In the third upheld ASC complaint, the Ombudsman recommended additional compensation of £4,000 for injustice arising from the delays in setting up an increased personal budget for a young adult with significant care and support needs, and for failing to respond properly to the first stage complaint. The Ombudsman also decided in this instance that the compensation should not be offset against debt owed to the Council.
- 4.41 The fourth upheld ASC complaint related to issues with a care and support package. The Ombudsman recommended an apology to the complainant's family for the distress and uncertainty caused by the failure to share the outcome of the review of the complainant's care package and removing funds from his direct payment account without warning. The Ombudsman also recommended a reminder to all relevant officers about the importance of promptly sharing details of care package reviews with service users, their carers and their family, and ensuring that at least one week's notice is given prior to recouping funds from a direct payment account.

Education and Children Services

- 4.42 The Ombudsman upheld three CYP complaints. In the first, the Ombudsman accepted that the Council had offered a reasonable financial remedy for delay in securing a suitable college place for the parent of a young person with special educational needs. However, the Ombudsman recommended that the Council should apologise and pay an additional £300 to the parent for the lack of updates about consultations and progress in securing her son's college place.
- 4.43 The second upheld CYP complaint related to failure to provide interim education to a young person with special educational needs when they were out of school and poor handling of a request for school transport. The Ombudsman concluded that the Council had already made an appropriate compensation award but recommended a further apology for failing to send a decision letter regarding the school transport application and failing to make further enquiries to better inform this decision.
- 4.44 The third upheld CYP complaint related to services provided to a former looked after child. The Ombudsman found fault in delays in the administration of the children's statutory complaints procedure. The Ombudsman recommended £200 compensation for the frustration this caused, as well as a reminder to relevant officers of the need to complete the children's statutory complaints procedure within the statutory timescales. One issue the Council faces here is that the children's statutory complaints procedure requires the employment of independent investigators, who can be difficult to recruit.

Healthy Streets and Parking

- 4.45 The Ombudsman upheld two Healthy Streets and Parking complaints. In one of these, a remedy had already been provided by the Council, therefore the LGSCO made no further recommendations. In the other, the LGSCO recommended that the Council refund enforcement agent fees which the service had not yet done.

Council Tax

- 4.46 The Ombudsman upheld two Council Tax complaints. In one of these, a remedy had already been provided by the Council, therefore the LGSCO made no further recommendations. The second upheld complaint related to a credit incorrectly applied to the complainant's Council Tax account which was subsequently reversed, generating an unexpected bill some years later. The Ombudsman recommended an apology, contacting the complainant to make a payment of £120 compensation the Council had already offered, and the development of guidance or procedure for staff: a) to have some sort of requirement for them to check on inputted account numbers for credits and debits; and b) that when a debt is generated because of Council error, that it contacts the taxpayer before sending an unexpected bill.

Regulatory Services

- 4.47 The Ombudsman concluded that the Community Protection team had failed on some occasions to respond to reports of anti-social behaviour (ASB) in line with its ASB policy. The Ombudsman recommended £100 compensation, an apology, and a review of how to meet the timescales outlined in the policy.

LGSCO Compensation

- 4.48 In 2024/25, the LGSCO asked the Council to pay an additional £8,620 in compensation across nine cases. This is £455 less than the previous year, 2023/24, where £9,075 was paid in compensation over thirteen cases. This continued a trend whereby 2023/24 also saw a reduction in the total additional compensation awarded by the LGSCO compared to 2022/23.
- 4.49 As noted above, LGSCO payments over £1,000 in 2024/25 included £3,350 compensation awarded in one of the Housing Needs cases for the amount of time the complainant was in unsuitable accommodation, and an additional £4,000 compensation for injustice arising from the delays in setting up an increased personal budget for a young adult with significant care and support needs.

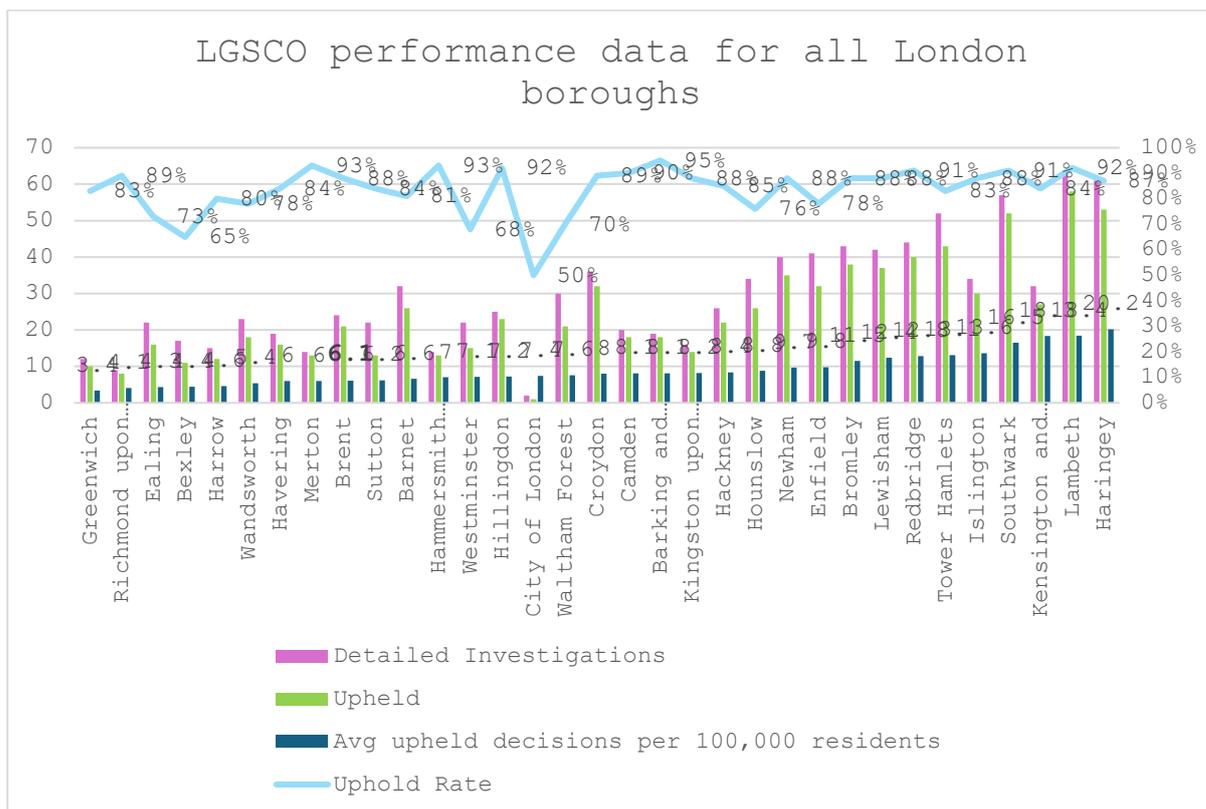
LGSCO performance compared to other London boroughs

- 4.50 Brent came 2nd highest of all London councils for upheld cases where a satisfactory remedy had already been provided before the complaint reached the Ombudsman. Of the 21 cases which were upheld during 2024/25, the Council had already offered a satisfactory resolution to the complaint before it reached the Ombudsman on seven occasions. This equates to 33% of our total upheld cases and is above the London average of 12%. For these seven cases, the Ombudsman confirmed no further action was required and just upheld the complaint because the Council had identified some fault and also upheld the complaint. There were also two cases where fault was found but only a further apology was required.

4.51 In comparison with all 32 London boroughs in 2024/25, Brent fares mid table on most of the criteria measured:

- 2nd highest at providing a satisfactory remedy before the complaint reached the Ombudsman, in 33% of cases (↑ green)
- 16th lowest in number of detailed investigations undertaken (- amber)
- 16th lowest in number of LGSCO upheld cases (- amber)
- 16th lowest in number of referrals to the LGSCO (- amber)
- Joint 11th highest LGSCO uphold rate (88%) in 2024/25 (↑ red)
- 9th lowest average upheld decisions per 100,000 residents (↓ green)

4.52 The table below shows the Ombudsman uphold rate, number of detailed investigations, cases upheld and uphold rate based on upheld decisions per 100,000 residents in 2024/25 compared with all London boroughs. Of the 24 detailed investigations undertaken by the LGSCO, 21 cases were upheld for Brent. This provides a uphold rate of 88% which is 11th highest out of all London Councils in percentage terms, however 16th lowest in the number of cases actually upheld and 9th lowest when comparing upheld decisions per 100,000 residents.



4.53 A performance comparison of all the LGSCO categories with other London boroughs has been provided in Appendix C.

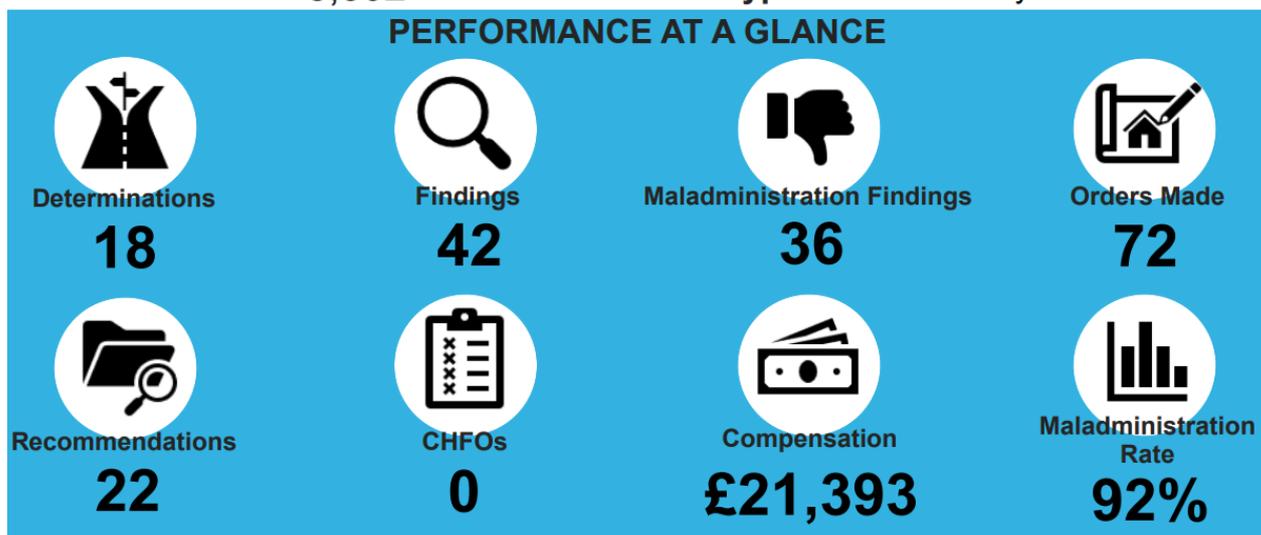
Housing Ombudsman (HO) Decisions and Learning Points

4.54 The Housing Ombudsman has not yet provided its annual report for 2024/25 and therefore we are unable to report on cases that have been referred to it for this financial year. The Housing Ombudsman has however asked that the comments

from their 2023/24 report are included in the Council's annual report for 2024/25. The table below has therefore been extracted from the Housing Ombudsman's 2023/24 report on the Housing Management Service's performance.

Landlord Homes: 8,302

Landlord Type: Local Authority / ALMO or TMO



4.55 The Housing Ombudsman decided eighteen Housing Management Service complaints in 2023/24, with forty-two findings and thirty-six maladministration findings arising from these decisions. These resulted in seventy-two orders and twenty-two recommendations. There were no complaint handling failure orders (CHFOs) and no severe maladministration findings issued, both of which are positive outcomes.

4.56 A total of £21,393 compensation was recorded as having been ordered by the Housing Ombudsman during 2023/24. Only £13,503 of this was additional compensation awarded by the Housing Ombudsman further to their investigations and decisions. £7,890 of the total compensation included in the total Housing Ombudsman figure of £21,393 had already been offered to complainants within the Council's complaints procedure.

4.57 A separate report providing more detailed analysis of Housing Management complaints, including Housing Ombudsman complaints, is included in **Appendix D**.

Compliments

4.58 In 2024/25 121 compliments were logged on the system for the Council, an increase of 5 from the previous year where 116 compliments were logged. Customers can send feedback to the Complaints Service or to service areas directly, who then forward it to the Complaints Service for logging. Example of some of the compliments have been provided below:

Housing Management

“Over all XXX was a unique housing officer...she was very good listener...she was not argumentative and judgmental.”

Libraries

"I have noticed that the number of electronically equipped tables has increased significantly. As a dedicated library member, I would like to express my gratitude to all the staff and management for their efforts in providing a comfortable and well-equipped environment for those who love studying and conducting research."

CYP - SEND

"I hope you are well. Happy new year.

I just wanted to say how grateful I am for your help a year ago - with [my daughter] and her EHCP - the support/conversations re planning and schools. [My daughter] is 1 term in and loving her time at [her new school] - having met wonderful friends and thriving in lessons and classes. Thank you sincerely and so far, I could not have wished for a better school, more support or kinder teachers for [my daughter]."

Complaints Service

"I am writing to inform you that I received the stage 2 complaint outcome today. I would like to take a moment to express my sincere gratitude for the support you have provided. Your assistance has been invaluable to me during this time."

ASC - Commissioning Contracting & Market Management

"XXX visited dad and I at dad's care home on Wednesday and was absolutely wonderful and so supportive. I wanted to write and tell you about the absolutely positive experience that we had with XXX. She is very talented and very good at her job."

5.0 Stakeholder and ward member consultation and engagement

5.1 This report is due to be considered at Cabinet and the relevant scrutiny committee.

6.0 Financial Considerations

6.1 The details provided on compensation payments in sections 4.14 – 4.16 and throughout this report, reflect the monetary impact of not getting things right the first time as an organisation, and the need to improve the customer experience, thus minimising the financial penalties incurred by the Council.

6.2 The total number of cases where compensation was awarded has increased by 34% when compared to 2023/24. The amount of compensation awarded for each case on average has increased by £82.

6.3 The total compensation awarded/offered and paid in 2024/25 was £277,814 (474 cases), which is a 56% increase to the previous year. This was primarily driven by Housing Needs Service complaints, especially at the second stage of the complaint procedure. The costs implications and budgetary impacts to the Council are being continuously monitored. At the same time, payment of the appropriate level of compensation is necessary not only to remedy individual injustice but also to protect

the Council from reputational risk, specifically an increase in adverse Ombudsman decisions.

7.0 Legal Considerations

7.1 Complaints concerning Adult Social Care and Children's Social Care fall under separate statutory complaint procedures. It is a legal requirement to produce annual reports for these areas and these are included in appendices A and B with reference to the statutory frameworks for the management of these statutory complaints.

7.2 The LGSCO is the final stage in the complaints process, where an individual has complained to the council and remains dissatisfied with the outcome. The LGSCO can investigate allegations of maladministration in connection with the exercise of a local authorities' administrative function, allegations regarding a failure in a service which it is the local authorities function to provide, an allegation or an apparent failure to provide such a service pursuant to the Local Government Act 1974 as amended.

7.3 The Housing Ombudsman's Complaint Handling Code became statutory on 1 April 2024, meaning that the Council is obliged by law to follow the requirements set out in the Code. The Social Housing (Regulation) Act 2023 places a duty on the Housing Ombudsman to monitor compliance with the statutory Complaint Handling Code. The Council's procedures and policies have been updated to take account of these changes.

8.0 Equity, Diversity & Inclusion (EDI) Considerations

8.1 Under Section 149 of the Equality Act 2010, the Council has a duty when exercising their functions to have 'due regard' to the need:

- (a) to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited under the Act;
- (b) advance equality of opportunity; and
- (c) foster good relations between those who share a "protected characteristic" and those who do not.

8.2 This is the Public Sector Equality Duty (PSED). The 'protected characteristics' are: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, sex, and sexual orientation.

8.3 Although there have been no equality implications identified as a result of this report, the Council is improving data that is collected on the complaints system so that data analysis can be used to identify issues that may disproportionately affect different equality groups.

9.0 Climate Change and Environmental Considerations

9.1 Not applicable

10.0 Human Resources/Property Considerations (if appropriate)

10.1 Not applicable

11.0 Communication Considerations

11.1 Not applicable

Report sign off:

Minesh Patel

Corporate Director Finance and Resources

Complaints Annual Report 2024 – 2025

Appendix A – Adult Social Care Statutory Complaints

1. Summary

- 1.1 This report provides an overview of statutory complaints made about Brent Adult Social Care (ASC) services from 1 April 2024 to 31 March 2025, as required under The Local Authority Social Services and National Health Service Complaints (England) Regulations 2009, the Health and Social Care Community Health & Standards Act 2003 and the Local Authority Social Services Complaints (England) Regulations 2006.

2. Statutory Complaints Process

- 2.1 The Department of Health defines an adult social care complaint as, *“an expression of dissatisfaction or disquiet about the actions, decisions or apparent failings of a Council’s adult social care provision which requires a response”*.
- 2.2 Anyone who has received a service, is currently receiving a service or is seeking a service from the Council can make a complaint. This includes anyone affected by decisions the Council makes about social care, including a service provided by an external provider acting on behalf of the Council. In such a case, they can complain directly to the provider or to the Council. External providers are required to have their own complaints procedures and must comply with them. They are also required to share information on complaints and outcomes with the Council.
- 2.3 Legislation states that there is only one stage in the statutory process, however the Council has interpreted this as a provisional response (stage 1) and a final decision (stage 2) so that it is in line with the corporate procedure. All complaints made to the Council are logged and acknowledged on our internal complaints database. The Council will try to resolve the provisional complaint as soon as possible, and within 25 working days of receipt. If delays are anticipated, the complainant is consulted and informed appropriately. All responses, regardless of whether a timescale has been agreed with the complainant or not, must be completed within six months of receiving the complaint.
- 2.4 The Head of Service should sign all provisional complaint responses and if complainants are still unhappy, they will be given the opportunity to have their complaint reviewed by the Director, Adult Social Care or the Corporate Director, Community, Health and Wellbeing. In some cases, complaints may need to be passed to the Safeguarding leads as appropriate and the complaints process suspended in order to allow the safeguarding process to be completed. In cases where the complaint relates to several organisations, a single organisation will act as the lead and co-ordinate a joint response to the complainant. The final complaint response must advise the complainant of their right to approach the Local Government & Social Care Ombudsman (LGSCO) should they remain dissatisfied.

3. Headlines

3.1 The main performance headlines from ASC statutory complaints are as follows:

- 114 complaints were received at the initial stage of the complaints process in 2024/25, a reduction of 14% from 2023/24.
- The volume for service areas for first stage complaints are as follows – Access, Information and Long Term Support (50%), Learning Disability and Mental Health (20%), Commissioning, Contracting and Market Management (10.5%), Intermediate Care and Principal Occupational Therapist (17.5%) and Safeguarding and Principal Social Worker (2%).
- 78% of provisional responses were upheld or partly upheld.
- 74% of stage 2 cases were upheld or partially upheld.
- 92% of stage 1 complaints were responded to on time which is a significant improvement on the 79% performance last year.
- There was a significant increase in the amount of compensation paid between 2023/24 and 2024/25 (further details in section 9 of this report)

4. ASC Service Users

4.1 In order to provide some context in relation to complaints submitted, in 2024/25 ASC recorded a total of 11,526 contacts, 3,680 via Brent Customer Services, 3,690 via ASC supported Hospital Discharge Team. ASC carried out 12,133 assessments as well as 7,036 reviews. Currently 1,751 people are receiving homecare and 499 people are receiving support in supported living or extra care sheltered housing, and 265 people are receiving Extra Care. At the end of March 2025, ASC was providing funded support to 4,478 people.

5. Complaints Received

5.1 In 2024/2025, ASC received 114 stage 1 statutory complaints compared to 131 in 2023/2024 which is a 14% decrease. In recent years, the overall number of stage 1 complaints received continually increased.

5.2 When complaints are received, they are directed to the Complaints Service for triaging. The Team will receive complaints by email, online through the web form or My Account, telephone and by letter. Brent Customer Services will also refer complainants to the Complaints Service. The ASC complaint legislation is explicit that the Council must receive complaints by any means. The ASC complaints process should be easy for all to access, and therefore the Team have provided a telephone number on the website especially for ASC clients. Staff within the Complaints Service will assist complainants as necessary, and if required will assist them in obtaining an advocate.

5.3 Statutory complaints received in this period are largely related to a service users' care needs assessment or the provision of social care needs through either homecare services or residential care. Anyone can approach the Council and is entitled to receive a care needs assessment. The main areas where ASC received complaints were Access, Information and Long-Term Support, Commissioning Contracting and Market Management and Learning Disability and Mental Health.

Details of the services they provide and the figures relating to complaints across these areas are as follows:

- ***Access, Information and Long Term Support:***

5.4 In 2024/2025, the service received 50% of all statutory complaints made to ASC at stage 1 (62 of 114). This is a significant increase on the previous year where 35% of cases received in 2023/2024 were for Access, Information and Long Term Support. This team deals with more complex support cases and have to manage service users' and families' expectations about the packages of care to which they are entitled. The complaints that are received by the team relate to disagreements with the decisions around care packages / assessments, delays in receiving an assessment and complaints concerning communication from social workers. The service users and their families will often have a higher expectation of the services they should receive than the Council can provide. The Council has to consider value for money, as well as the needs of the service user when providing services. These are complex and often sensitive matters and can lead to understandable disputes between the parties involved. This Team serves as the front-door to services within ASC and take on a larger number of cases compared to other services. There has been a concerted effort to improve complaint handling throughout the service and develop a more robust working relationship with the Complaints Service to help reduce the number of complaints, an example being fortnightly case conferences and complaints training.

- ***Commissioning Contracting and Market Management:***

5.5 In 2024/2025, complaints relating to these services accounted for 10.5% of all complaints received by ASC which is a significant decrease from 21% in the previous year. Overall, 14 complaints were received for this service area in 2024/2025 at stage 1 and stage 2 compared to 31 received in the previous year.

- ***Intermediate Care and Principal Occupational Therapist:***

5.6 Of the 114 cases received at Stage 1 for ASC, this service received 20 complaints (17.5% of all complaints received by ASC at stage 1). At stage 2, five complaints were received from this service.

- ***Learning Disability and Mental Health:***

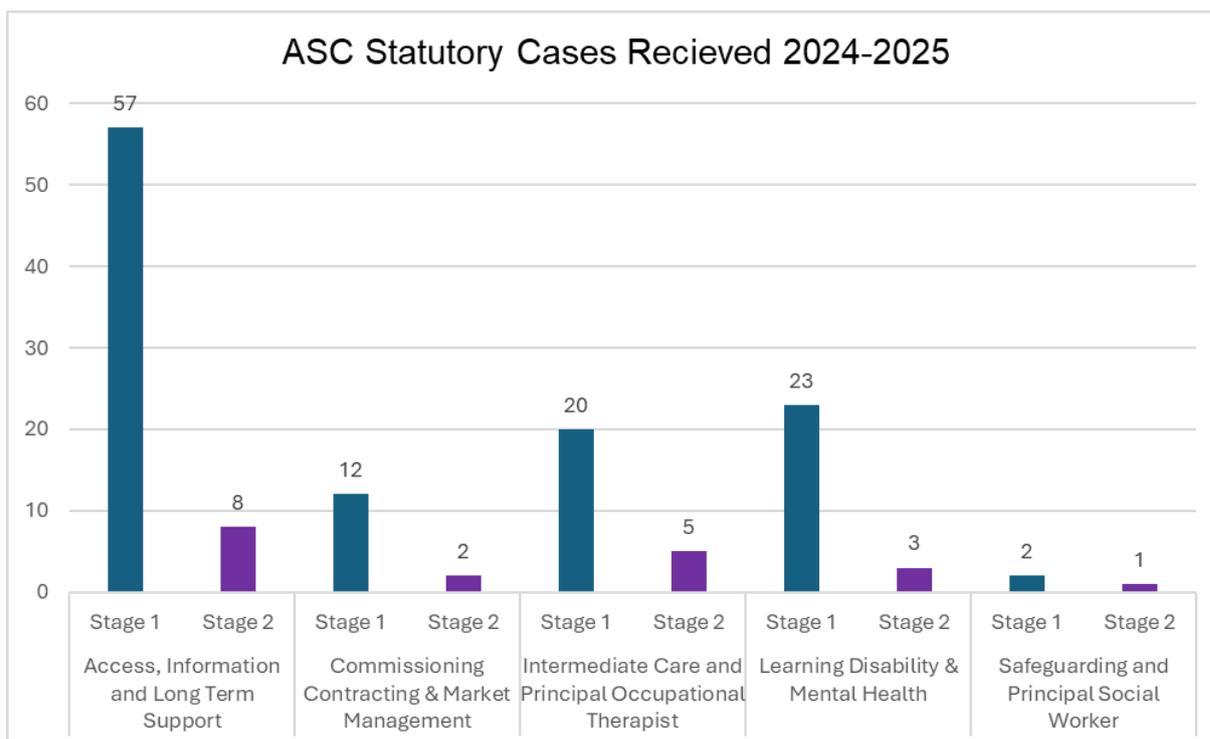
5.7 This service accounted for 20% of all complaints received by ASC at stage 1 in 2023/2024, a marginal decrease of 3% from the previous year. This service is smaller in comparison to others in ASC however this service deal with cases of a complex nature.

- ***Safeguarding and Principal Social Worker:***

5.8 This service rarely receives complaints because issues of safeguarding are usually reviewed within the service areas in which customers are provided support. The one

case received related to a Doctor from a GP practice who made a safeguarding referral regarding one of their patients. The Safeguarding Team closed their enquiries however the complainant was not happy about this so requested a complaint investigation.

5.9 The chart below shows the number of ASC statutory complaints received in 2024/2025. Of the 114 statutory complaints received at stage one, 19 were escalated to the final review stage, which is more than last year. In 2023/2024, 11 complaints were escalated and in 2022/2023 12 were escalated to the final review stage. This year saw a significant increase in escalations.

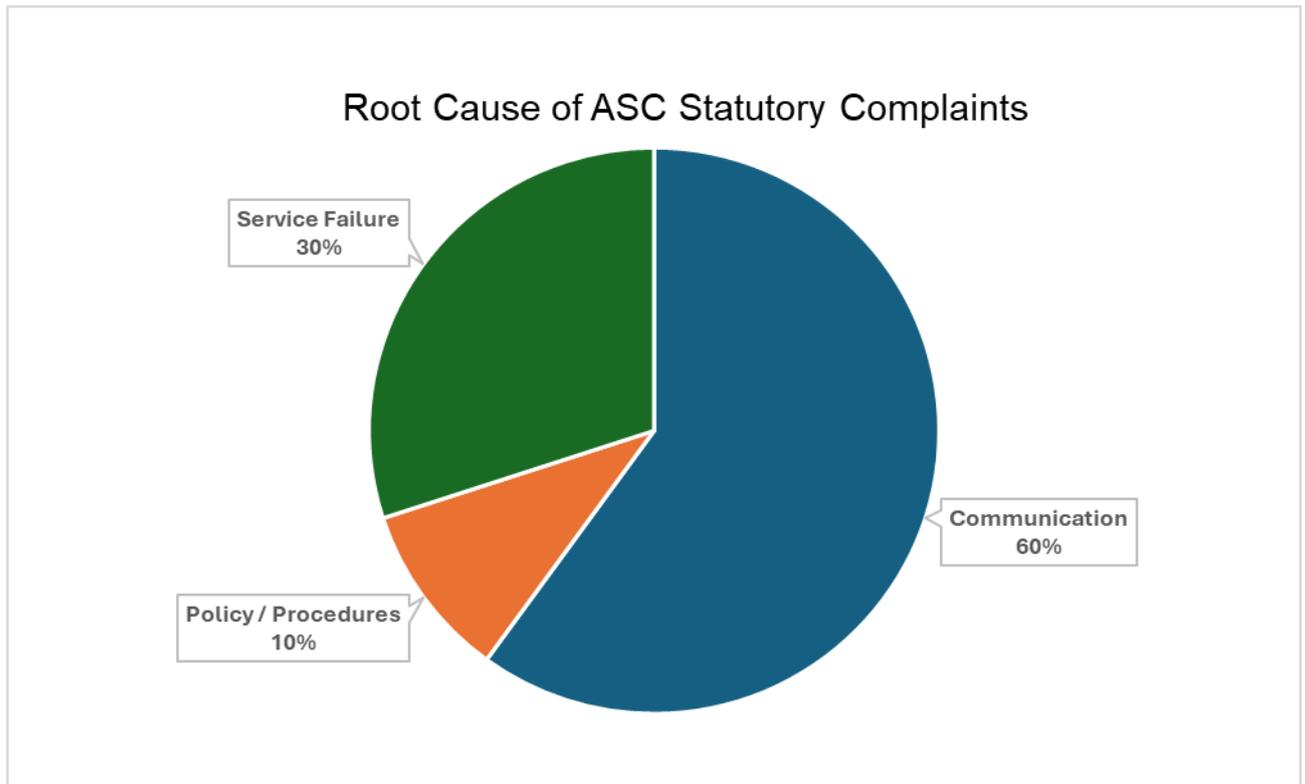


5.10 In 2024/2025, the escalation rate for statutory complaints is 17% compared to 8% in 2023/2024 and 11% in 2022/23. This is partly due to the increased demand on services and more education around complaints investigations needed. ASC actively tries to resolve concerns, however, despite this, some of the more complex cases are escalated. Access, Information and Long-Term Support received 8 cases and Intermediate Care and Principle Occupational Therapist services received 5 cases. These services have the highest number of stage 2 escalations. Both services received 3 stage 2 escalations each last year. This issue became apparent mid-way through the year and as a result, the Complaints Service set up fortnightly case conferences to assist with the quality of stage 1 responses.

6. Nature / Reasons for Complaints

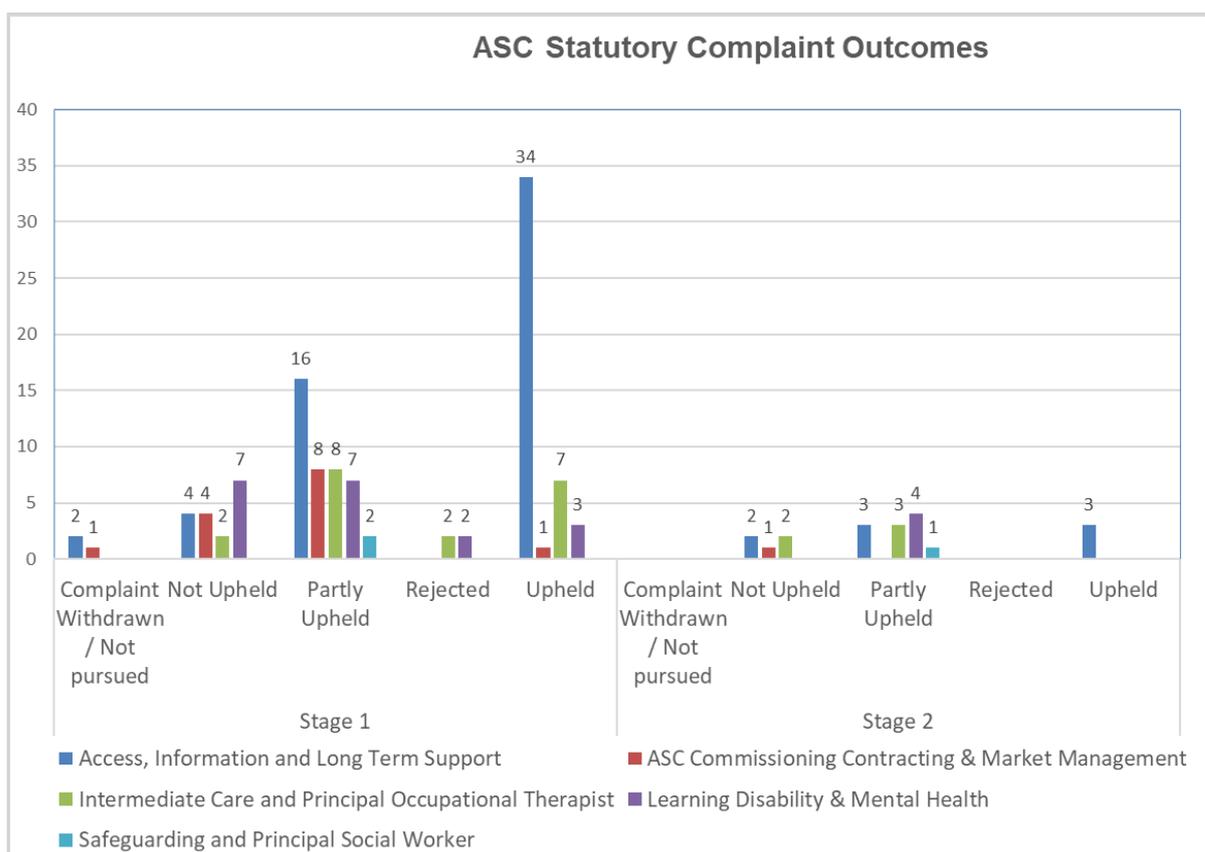
6.1 In 2024/2025, communication issues accounted for 60% of all complaints received, demonstrating a slight increase from 2023/2024 when this was the case for 57% of complaints. This rise suggests there are still ongoing challenges with keeping service users informed and updated. Service failure accounted for 30% of complaints, showing a slight decrease from 33% the previous year, indicating some

improvement in services. Complaints related to policy or procedure remains the same as last year at 10% of all complaints received.



7. Complaint Outcomes

7.1 The chart below shows the outcome of statutory complaints at stage 1 and final review stage:



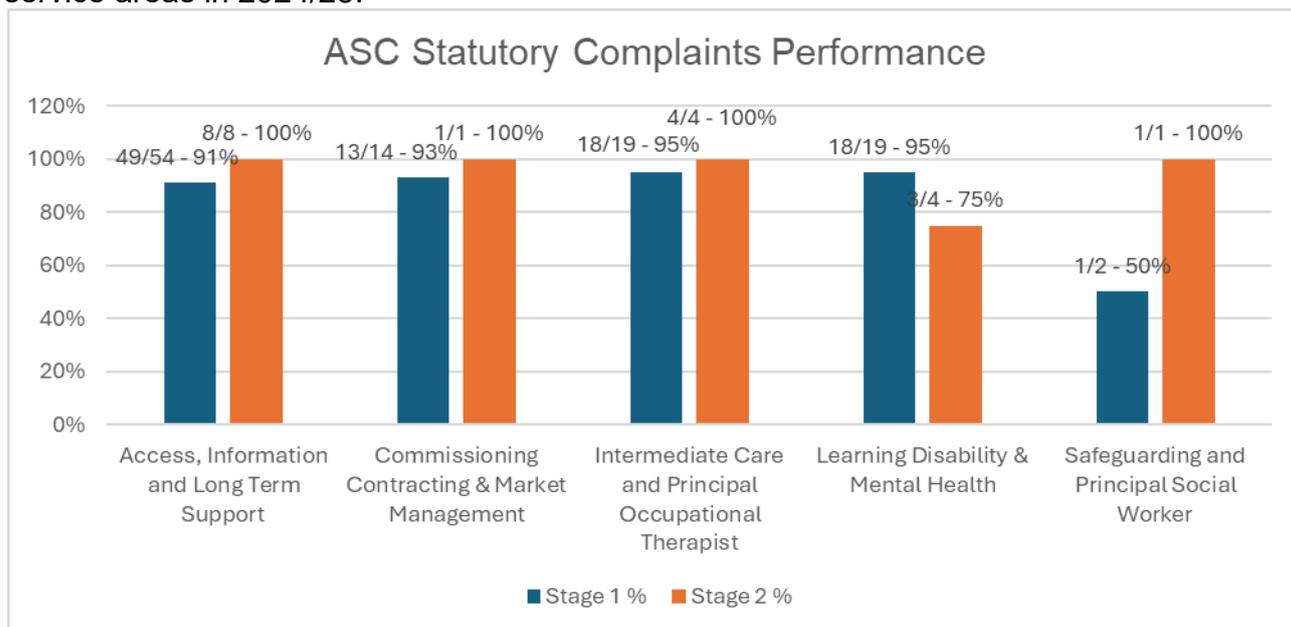
- 7.2 Complaints received at stage 1 show that some fault (upheld or partly upheld) by the Council was found in 78% of cases, showing a significant increase compared to some fault being found in 66% of cases in 2023/2024. The increase in cases upheld shows services are continually willing to accept fault and make service improvements.
- 7.3 Complaints of a complex nature and which involve a number of teams are more typically escalated to stage 2. At stage 2, some fault was found in 74% (14/18 stage 2 complaints received) of cases, this is a significant increase from 2023/2024 where some fault was found in 36% of cases as well as from 2022/23 where 61% of complaints were either upheld or partly upheld. The Complaints Service has worked with colleagues in ASC to identify appropriate service improvements through stage 1 quality assurance. The figures above shows that this has had a significant impact with outcomes (upheld/not upheld) at stage 2 remains the same as stage 1. However, there are some instances where only part of the service improvements have been identified and at stage 2, a wider approach is needed to resolve a complainant's concerns.
- 7.4 The Complaints Service continues to work with ASC to review the accuracy and quality of stage 1 responses, where they have escalated to the final stage, and report the findings to the ASC Management Team in order to implement strategies to reduce the number of escalations.
- 7.5 The Complaints Service are also working to ensure that the different departments within ASC are better coordinated when dealing with complaints about services that crossover the various teams by providing advice and regular complaints training. As a result of the recent changes in leadership across the service area, the Complaints

Service have identified a need to retrain senior members of staff and to advise them on timescales and quality of responses. Since November 2024, the Complaints Service began fortnightly case conferences to assist ASC on how to respond to complex complaints.

7.6 Some service improvements identified at the final review stage have been included in point 14 - Learning from Complaints.

8. Timeliness of Responses

8.1 The chart below shows complaint response timeliness across the various ASC service areas in 2024/25:



8.2 In 2024/2025, ASC responded on average to 92% of all stage 1 complaints within timescales which is a significant improvement on the 79% in the previous year. Stage 2 response times have remained consistent from last year, with one case being overdue as a result of a low staffing period.

9. Compensation

9.1 The below table provides a comparison to last year of the compensation paid on ASC cases across all stages of the complaints process.

ASC	2024/25 Amount	2023/24 Amount
Stage 1 / Provisional	£1,715	£100
Stage 2 / Final	£17,052.43	£800
Ombudsman	£4,100	£1,850
Total	£22,867.43	£2,750

9.2 At stage two, compensation was awarded on 13 cases. Some of these cases were escalated to stage 2 as a result of the lack of compensation awarded at stage 1 or,

where the need to pay compensation was identified, there was a failure to pay the sum awarded.

- 9.3 The Complaints Service have been working with ASC to encourage offers of compensation where it is warranted and deemed appropriate. As part of this effort, the Complaints Service has offered to deliver training to ASC staff to support them in processing compensation payments.
- 9.4 We continue to advocate for the implementation of a streamlined payment process, in collaboration with the relevant department and the ASC Finance Partner and await further updates on the progress of this development.
- 9.5 Significant payments were made on two cases, one for £5,150 and one for £7,052.43. The Ombudsman awarded a further £4,100 on two cases with one case being awarded an additional £4,000 to the £5,150 that was awarded at stage two.
- 9.6 All compensation awarded by the Council is in accordance with the Local Government and Social Care Ombudsman remedies guidance.

10. Local Government and Social Care Ombudsman Decisions in 2024/2025

- 10.1 The Local Government and Social Care Ombudsman (LGSCO) provide statistics for cases received and decisions made during a financial year as a complaint that has been received in one period may be decided in the following financial period. In the financial period 2024/2025 the LGSCO received 154 complaints (corporate and statutory) and enquiries across the Council and of those, 20 related to Adult Social Care, which is three less than the previous year. In total, 138 decisions were made by the LGSCO in the 2024/25 financial year for Brent of which 17 decisions related to ASC, which is eight less when compared to the previous year where 25 decisions related to ASC. The LGSCO's decisions included referring four cases back to the Council for local resolution as the Council's complaints process had not been completed. Two cases were closed by the Ombudsman as there was insufficient information or invalid information to proceed, one case was closed as advice had been given and four cases were closed after initial enquiries as there was no worthwhile outcome achievable by investigation. Detailed investigations were carried out in 6 cases. Of those, 5 were upheld (one less than in 2023/24) and 1 was not upheld. Three of the cases upheld were statutory cases and a summary for them has been provided in section 10.3. The other two cases were corporate cases and a summary has been provided in the Annual Complaints cover report.
- 10.2 The uphold rate to the LGSCO for ASC cases is 80%, which is less than the previous year at 86%.
- 10.3 A summary of the complaints upheld by the LGSCO is provided below:
- In the first upheld complaint, a mother complained about various issues regarding her son's supported living placement. The Ombudsman found some fault and recommended the following actions: apologies to both mother and son; £100 time and trouble compensation to the mother; completion of a financial mental capacity assessment and best interest decision for the son; a reminder to relevant officers of

their duties in safeguarding adults; a reminder to relevant officers of the importance of effective complaint handling.

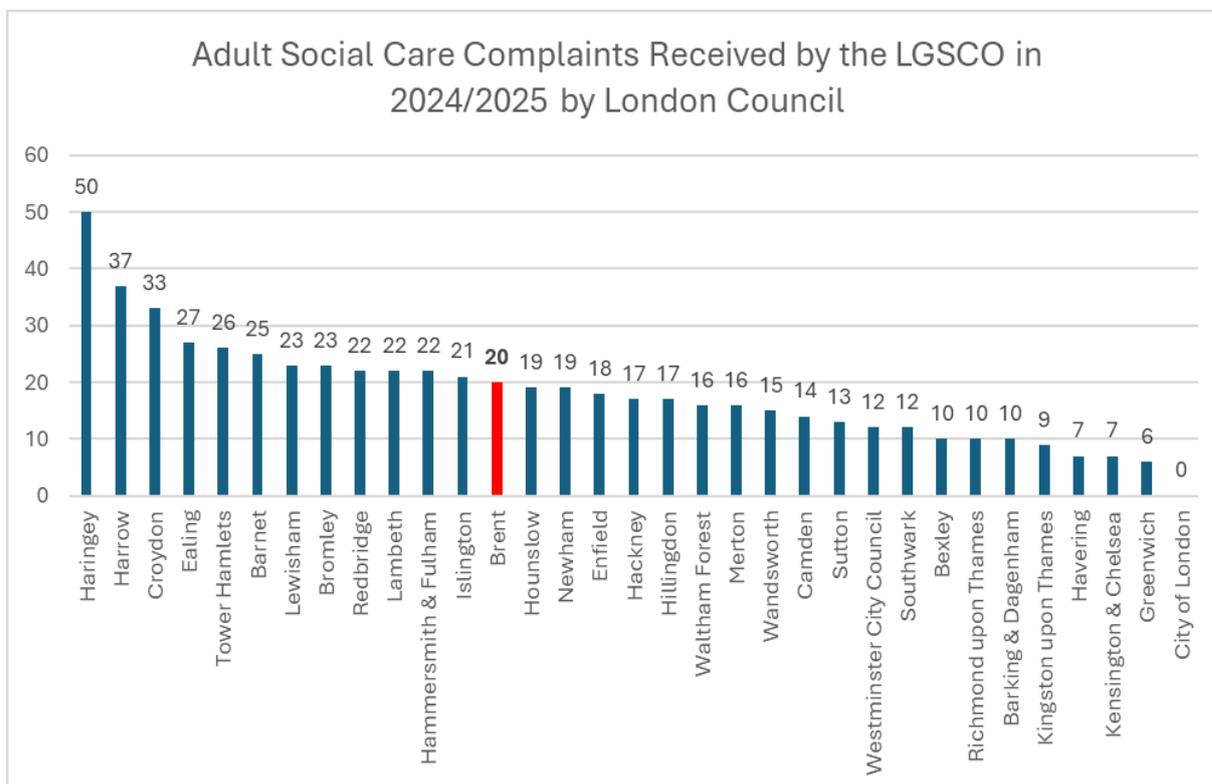
- In the second upheld complaint, the Ombudsman recommended additional compensation of £4,000 for injustice arising from the delays in setting up an increased personal budget for a young adult with significant care and support needs, and for failing to respond properly to the first stage complaint. The Ombudsman also decided in this instance that the compensation should not be offset against debt owed to the Council.

- The third upheld complaint related to issues with a care and support package. The Ombudsman recommended an apology to the complainant's family for the distress and uncertainty caused by the failure to share the outcome of the review of the complainant's care package and removing funds from his direct payment account without warning. The Ombudsman also recommended a reminder to all relevant officers about the importance of promptly sharing details of care package reviews with service users, their carers and their family, and ensuring that at least one week's notice is given prior to recouping funds from a direct payment account.

11. Benchmarking Data

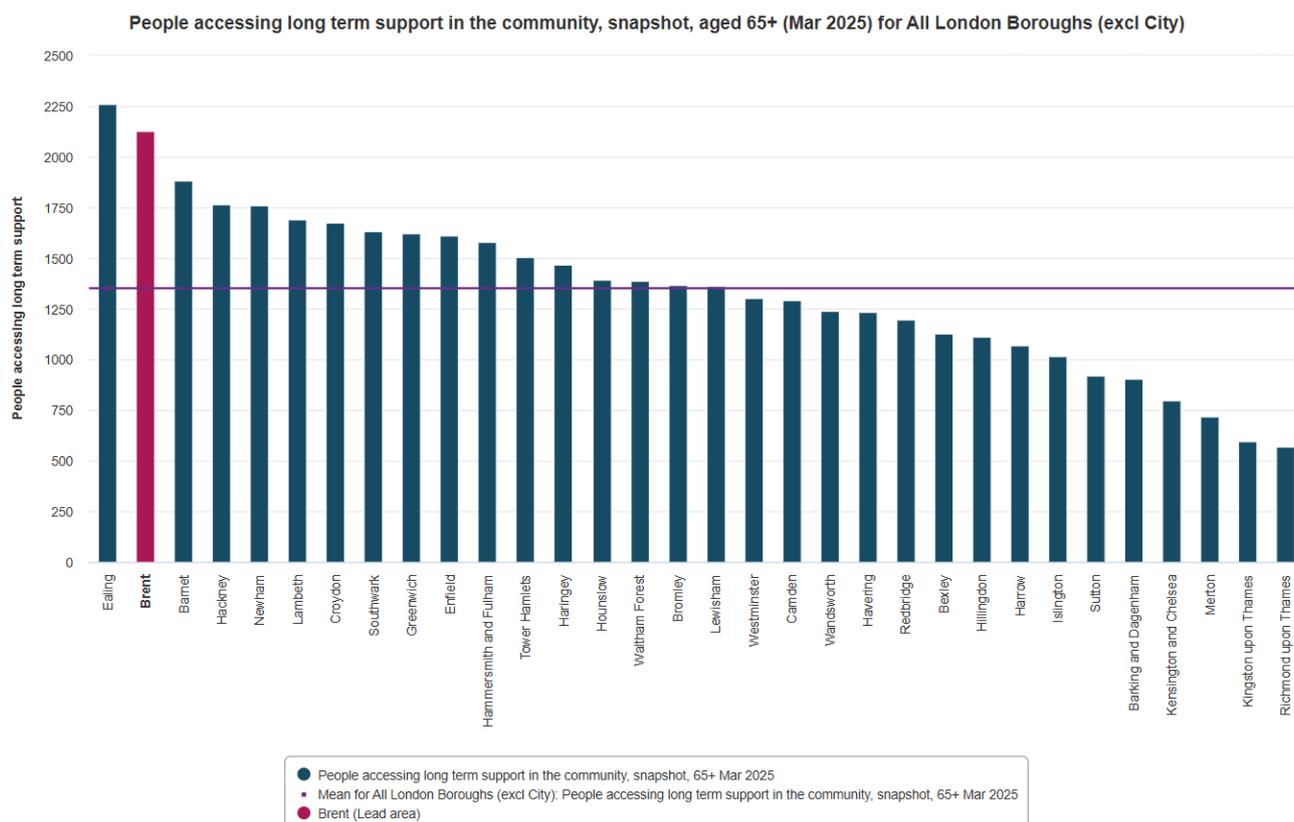
11.1 Brent Council belongs to the North West London Social Care Complaint Managers Group. Unfortunately, many Councils have not yet completed their Complaints Annual Report or are reluctant to share their data.

11.2 The graph below shows data provided by the LGSCO with regards to the number of Adult Social Care complaints/enquiries received for each London borough.



11.3 The graph includes corporate as well as statutory complaints. In terms of complaints/enquiries received by the Ombudsman in relation to ASC, Brent has a high number of complaint/enquiries compared with other Councils. There are twelve London boroughs that had a higher number of complaints received. The complaints received are seven higher than the previous year for Brent, however, generally the number of complaints received regarding ASC across London is increasing, with a total of 491 received last year compared to 598 received this year for all London Councils. The figures provided do not necessarily mean that the complaint/enquiries were warranted but does show that ASC complaints continue to increase.

11.4 The data below from the Local Government Association also shows that Brent is supporting almost the most people aged over 65+ which means more complaints are to be expected. In addition to this, there are Councils supporting fewer people who are seeing more ASC LGSCO complaints than Brent (see bench marking graph in section 11.2 - Haringey for example is supporting less people but has highest amount of complaints escalated to the LGSCO for instance).



Source:
Department of Health and Social Care

12 Customer Feedback and Engagement

12.1 The majority of customer contact with the Complaints Service is reactive in that the Team responds to direct contact from customers and their representatives when they report a problem. Through this initial contact, the team, in conjunction with ASC managers, has been able to informally resolve a number of complaints at an early stage of contact, e.g. delayed OT assessments / care assessments, identifying resolutions to invoicing / billing queries that could have progressed to formal complaints.

13 Compliments

13.1 Compliments are as valuable as complaints in helping to improve services. When individuals take the time to tell the Council what is working well, it allows us to acknowledge excellent practice and reinforce our strengths.

13.2 Many compliments are given verbally through face-to-face conversations or phone calls and are not formally recorded, meaning they are not fully reflected in the annual figures.

13.3 A total of 18 compliments were formally recorded in 2024/25, compared to 27 in 2023/24. This represents a decrease and highlights the importance of recognising good practice as part of our quality assurance approach. Below are examples of compliments that staff in ASC have received:

- **Access Information Safeguarding and Well-Being Services**

“thank you so much for all your help with my father - the family really appreciate it. Thank you for all your efforts, time and assistance to get the appropriate equipment to make dad’s life a bit easier. This will help the team to keep him safer. Thank you for the paperwork too which I hope will help us to move forward so dad can be assessed for financial help etc. Wishing you all the best. Once again a very big thank you”.

- **Personalisation and Customer Reviews**

“[staff member] came to visit my mum, to carry out an assessment on her. My mum was a lot better than a couple of months ago as her mobility and personal capabilities had improved immensely. Therefore, my mum did not need the carers package as before. [staff member] was extremely professional and carried out my mums physical and mental assessment with great care and understanding, taking in to account my mums limited English. [staff member] was empathetic and listened, providing ideas and planned a care package which is the most effective and realistic for my mother. [staff member] assessed my mother in great detail and care, taking her through every obstacle that she may face day to day and how my mother is able to carry these out or not according to her capabilities. My mother felt so much warmth from [staff member] at the end of the meeting, my mother wanted to keep her longer. You are really lucky to have [staff member] working with you, I wish there were more like her, who care and are very passionate about their work”

- **Learning Disability, Mental Health and Autism**

“I am writing to commend your team, especially [staffs’ name) for their stellar support in dealing with the social care issues that we have encountered on Shore ward, and more specifically, for all the support they provided to our team in managing a particularly challenging case we recently had on the ward. They were able to raise concerns as needed and respond to our concerns in a very timely manner. They also attended all the required meetings to discuss the case. This is not something that I have always found during my tenure at PRCMH, which is why I felt the need to highlight it and say a big thank you. [staff member] in particular has shown that she is a valuable member of the senior management team and someone I have found to be professional but quite easy to liaise with. I look forward to continuing to work with them to ensure that patients are well looked after and provided with the care and support to help them stay well and safe in the community”

- **Intermediate Care and Occupational Therapy Service**

“I greatly appreciate your services and thank you and your team for the great job you do. [staff member] has been a great support in understanding my needs in this

difficult time I am going through because of my accident. He has arranged for the right Care Package, who also in turn are very supportive and deal empathically. I am truly very thankful to [staff member] for dealing in most professional manner, compassionately assessing the client's needs and arranging the right care package. He is a good listener who motivates and encourages me to come out of this difficult situation soon. His visits have been nice and peaceful. In short, I feel he is a great asset to your team and I wish him a great success in his career. Wishing your team and [staff member] a great success in your field”

14 Learning from Complaints

14.1 Learning from complaints offers a vital opportunity to improve services based on real-life experiences. Staff and managers responding to complaints are expected to identify any lessons learned, with learning outcome action plans developed for more complex cases.

14.2 Throughout 2024/25, Adult Social Care has continued to analyse a wide range of feedback from service users and carers, including that gathered via the Adult Social Care Outcomes Framework (ASCOF) and locally collected data. Complaints, enquiries, and requests have also informed our learning.

14.3 According to the most recent Adult Social Care Survey (2024/25), 83% of individuals reported feeling extremely, very, or quite satisfied with the care and support they receive. The majority also stated that they enjoy a good quality of life and feel safe.

14.4 Brent Adult Social Care considers feedback from both compliments and complaints to be an integral part of its Quality Assurance process. Depending on the learning identified, ASC uses a variety of approaches to share and embed improvements across the service. These include:

- Developing and issuing updated practice guidance amongst staff and providers.
- Sharing updates during supervision, team meetings, ASC Quarterly meetings, dedicated learning forums and developing action plans to address areas of learning.
- Conducting case file audits to monitor and improve the quality of practice
- Sharing relevant complaint insights with other departments, such as Brent Customer Services

14.5 Where the learning is case-specific, it may not warrant changes to broader policy or procedure, but targeted learning is still addressed through team training, supervision, reflective practice, and development sessions.

14.6 Learning from residents' experiences also highlights areas where policy or service improvement is needed. It ensures senior leaders are aware of residents' concerns, strengthens communication, and supports service development. Brent's Co-production and Community Partnership approach actively engages residents and partners to co-design services that better meet local needs—helping to reduce complaints and improve satisfaction.

14.7 ASC also conducts quarterly reviews of complaints through the Improvement and Assurance Board. These reviews enable the sharing of learning, tracking of actions, and clarification of service standards directly with staff in response to complaint findings.

Complaints Annual Report 2024 – 2025

Appendix B – Children’s Social Care Statutory Complaints

1. Purpose of report

- 1.1 This report provides an overview of statutory complaints made about Brent Council Children’s Social Care Services as required under The Children Act 1989 Representation Procedure (England) Regulations 2006.
- 1.2 This report provides information about all statutory complaints made during the twelve months between 1 April 2024 and 31 March 2025 under the complaints and representations procedures.

2. Statutory Complaints Process

- 2.1 The purpose of the Children’s Act 1989 and Representation Procedure (England) Regulations 2006 is to ensure local authorities have a formal complaint handling procedure in place for children and young people who wish to make a representation or complaint about social care.
- 2.2 It is helpful to be clear on what constitutes a complaint. The guidance “Getting the best from Complaints” produced by the Department for Education and Skills (DfES) provides advice for local authorities on implementing the Children Act 1989 complaints procedure for children and young people. It defines a complaint as: **‘A complaint may be generally defined as an expression of dissatisfaction or disquiet in relation to an individual child or young person, which requires a response.’**
- 2.3 **Who Can Make a Complaint?**

Section 26(3) and section 24D of the Children Act, 1989 and section 3(1) of the Adoption and Children Act, 2002 require Councils to consider complaints made by:

- any child or young person (or their parent or someone who has parental responsibility for them) who is being looked after by the local authority, or is not looked after by them but is in need
- any local authority foster carer (including those caring for children placed through independent fostering agencies)
- children leaving care
- special guardians
- a child or young person (or parent of his) to whom a Special Guardian order is in force
- any person who has applied for an assessment under section 14F (3) or (4) of the Children Act 1989
- any child or young person who may be adopted, their parents and guardians
- persons wishing to adopt a child
- any other person to whom arrangements for the provision of adoption services extend
- adopted persons, their parents, natural parents, and former guardians

- such other person as the local authority considers has sufficient interest in the child or young person's welfare to warrant his or her representations being considered by them.

2.4 The Council will accept complaints received through any medium, through contact with the Complaints Service, phone, email, online complaint form, by post or in person.

2.5 The regulations set out three stages:

- **Stage 1: Local Resolution** – this is the most important stage of the complaints procedure. The department and external contractors provide services on behalf of the Council and are expected to resolve as many complaints as possible at this initial stage. The statutory social care complaints procedure requires first stage complaints to be responded to within 10 working days. However, Heads of Service can request an extension of a further 10 working days where a complaint is considered complex or there is a need for a number of external organisations to be consulted. They will need to consult with the Complaints Service before an extension can be applied and also inform the complainant of the new timescale.
- **Stage 2: Independent Investigation** – this stage is triggered when the complainant is dissatisfied with the response at Stage 1. As a first step, the Complaints Service will consider mediation to resolve ongoing concerns at the end of the Stage 1 process, and before commencing the Stage 2 process. If a complaint does progress to Stage 2, this requires an investigation by an 'Independent Officer', a person external to the service and usually independent of the Council. In addition, the Council is also required to appoint an "Independent Person" who is independent of the Council and not related to any members or officers of the Council. The purpose of the 'Independent Person' is to represent the complainant in the process. The Stage 2 investigation report is then considered by the Director, who provides an adjudication letter to the complainant to confirm whether they agree with the report and the steps to be taken to address any recommendations. Stage 2 complaints which fall within the statutory process must be dealt with in 25 working days. Where it is not possible to complete the investigation within this timeframe an extension can be applied up to a maximum of 65 working days.
- **Stage 3: Review Panel** – where complainants are dissatisfied with the result of a Stage 2 investigation and wish to continue with their complaint about statutory social service functions, the Council is required to establish a Complaint Review Panel. The Panel consists of three independent panellists who have no connection to the Council; a Chair who is appointed by the Complaints Service and is also separate from the Council. The Chair consults with the Complaints Service on the selection of the other two panel members. The Panel undertakes an investigation and makes recommendations via a panel report. This will then be adjudicated by the Corporate Director for Children and Young People (CYP) who makes the final decision on the complaint.

2.6 If the Complainant remains unhappy with the outcome of their complaint, they have the right to refer their concerns to the Local Government and Social Care Ombudsman (LGSCO). The LGSCO will carry out their own investigation requesting information from both parties and provide an outcome with any recommendations if appropriate.

3. Headlines

3.1 The main performance headlines from Children’s Social Care are as follows:

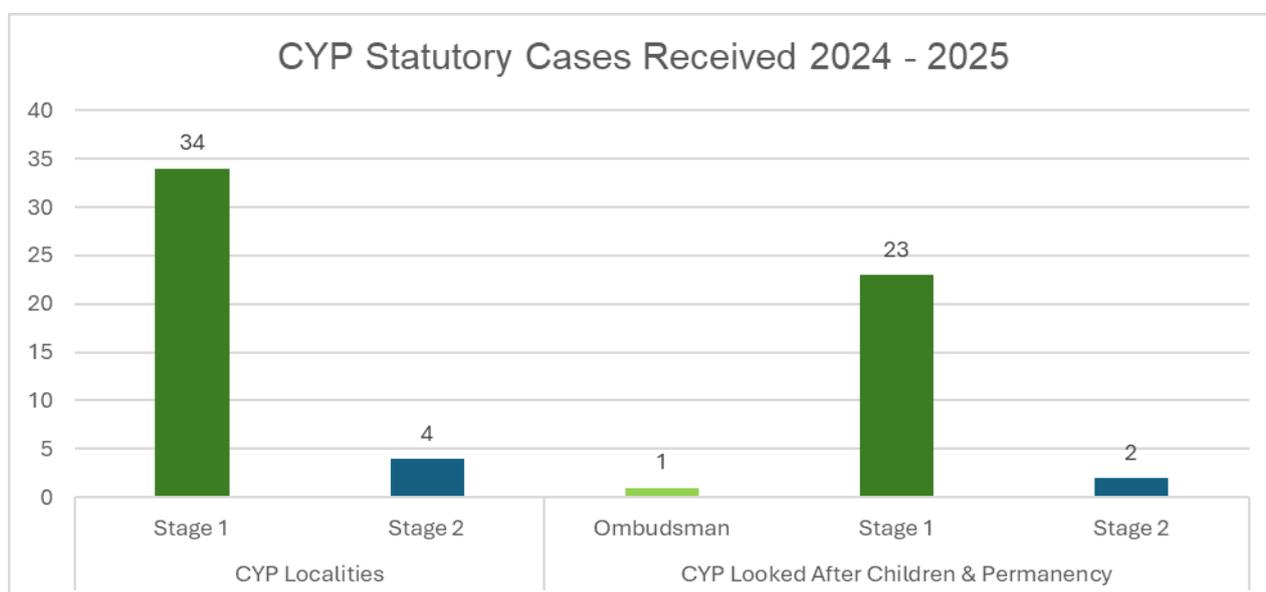
- The department received 59 statutory stage 1 complaints in 2024/25
- Stage 1 statutory complaint numbers increased by 39% in 2024/25
- There were eleven stage 2 investigations received and six of those investigations closed compared to seven the previous year
- 78% of stage 1 statutory complaints were responded to within target in 2024/25, against a target of 100%. This is the same as the previous year.
- £4,715 was paid in compensation for the period 2024/25, a slight decrease from £6,095 paid in the previous year.

4. Children’s Social Care Service Users

Subject to formal returns being received, Children’s Social Care received a total of 3,571 referrals and completed 3,110 Child & Family Assessments. The Council had 2,829 open Children in Need cases and 329 children were the subject of a Child Protection Plan. There were 296 Looked After Children and the Council had 618 care leavers aged 18-25 eligible for services.

5. Complaints Received

5.1 Brent Council CYP received a total of 57 stage 1 statutory complaints in 2024/25, an increase of 39% from last year where 41 complaints were received. There were six stage 2 requests received which is one less than last year.



- 5.2 The number of stage 1 complaints received for Localities was 34 which is an increase of 54.5% in comparison to the previous year with 22 complaints received. The number of complaints received at stage 1 for Looked After Children and Permanency increased by 28% from 2023/24 with 23 complaints received in 2024/25.
- 5.3 The Localities Service accounted for 34 complaints, 60% of the total number of stage 1 complaints received. These are split between East Localities, West Localities, Children with Disabilities and Multi-agency Safeguarding Hub (MASH)/Family Front door/ Families with no recourse to public funds (NRPF). These complaints concerned the communication and attitude of social workers, the accuracy of reports and assessments and disagreements over the size of support packages.
- 5.4 The Children with Disabilities team received 18 stage 1 complaints in 2024/25 and four were escalated to stage 2. These cases commonly related to reductions in care packages and disagreements relating to this. Another common theme was around communication and information contained within records and reports. The Family Front Door/MASH/NRPF team received 11 stage 1 complaints, these generally concerned unhappiness with the behaviour of the allocated social worker and the process following a referral to Brent Family Front Door (BFFD).
- 5.5 Looked after Children accounted for 40% of the total number of stage 1 complaints received. The complaints received are split between Care Planning, Young People in Care, Fostering and Adoption and Kinship. Cases within Looked After Children are typically raised by the young person themselves so the Complaints Service will give the option of an advocate to help them navigate the complaints process, should this be required.
- 5.6 The Council received 6 Stage 2 requests in 2024/25, compared to 7 in 2023/24. Two of these complaints related to the Looked after Children and Permanency Service. The other four cases fell under Localities, more specifically the Children with Disabilities Service received three stage 2 requests, and one for the East Locality Team.
- 5.7 Under the children's statutory procedure, a complainant has a right for their complaint to be heard by an Independent Review Panel at Stage 3. In the later part of 2024/25 the Council received 2 requests for Stage 3 panels however they will be closed in the new financial year.

6. Profile of complainants and method of contact

- 6.1 When complaints are received, they are directed to the Complaints Service for triaging. Of all the statutory children's stage 1 complaints received, the team received 70% by email and 30% by self-service online. The number of complaints received via email remains similar compared to last year. We received 5% of cases via telephone last year and none this year. There also hasn't been much change in the percentage of complaints received via the online portal. The complaint legislation explicitly states that the Council must receive children's statutory complaints by any means.

- 6.2 The varied method of contact demonstrates that this is happening. Whilst the team has provided a telephone number on the web site, especially for children’s social care complaints, email appears to be the preferred mode of delivery for complainants. There are three options to log complaints online through the customer portal: anonymously, unregistered or registered. The portal allows complainants to log and monitor the progress of their complaints all in one place. There are also other mechanisms in place by which children and young people can raise issues before needing to raise a formal complaint. This is via a commissioned Advocacy service and Looked After CYP have an Independent Reviewing Officer who is able to advocate on CYP’s behalf as well.
- 6.3 The Council has limited information about the ages of complainants as many complainants do not provide this information. 23 complainants provided their age out of a possible 59 complaints that were received. Two of the complainants were under the age of 18, four of the complainants were aged between 22 – 25 years old. The remaining complainants who lodged complaints were 28 or over. The majority of complaints received in relation to Localities are raised by parents regarding their children, however, the majority of complaints received by the Looked after Children service are raised by the young person themselves.
- 6.4 In terms of ethnicity of complainants, 16 complainants selected an option when submitting their complaints through the portal. The data captured is as follows:

Any other ethnic group	2
Asian Indian	1
Asian Other	0
Asian/Asian British: Indian	2
Asian/Asian British: Pakistani	1
Black British	1
Black/ African/Caribbean/Black British: African	4
Black/ African/Caribbean/Black British: Caribbean	1
Mixed Other	1
Other Arab	1
White British	0
White Other	2

7. Nature / Reasons for Complaints

- 7.1 The main reason for complaints received in 2024/25 related to service failure which is the same as last year. Complaint root causes are categorised in three main categories: Communication, Service Failure and Policy and Procedure. In 2024/25 56% of the stage 1 complaints closed were categorised under the category service failure. Communication accounted for 32% of cases and policy and procedure for 12%. Complaints concerning communication generally related to complainants not feeling they were kept informed or updated on key issues. The Directorate continue to make improvements on how they communicate with service users to manage expectations.

7.2 Numerous complaints also concerned a reduction in a care package. Service users often felt that the decision to reduce the package was unfair and the reason for this was not communicated well. In the majority of these cases, the complaint was upheld. As a result of a stage 2 investigation, it was recommended that the cases that were impacted by care package reductions were audited to ensure the decisions were in line with the policy.

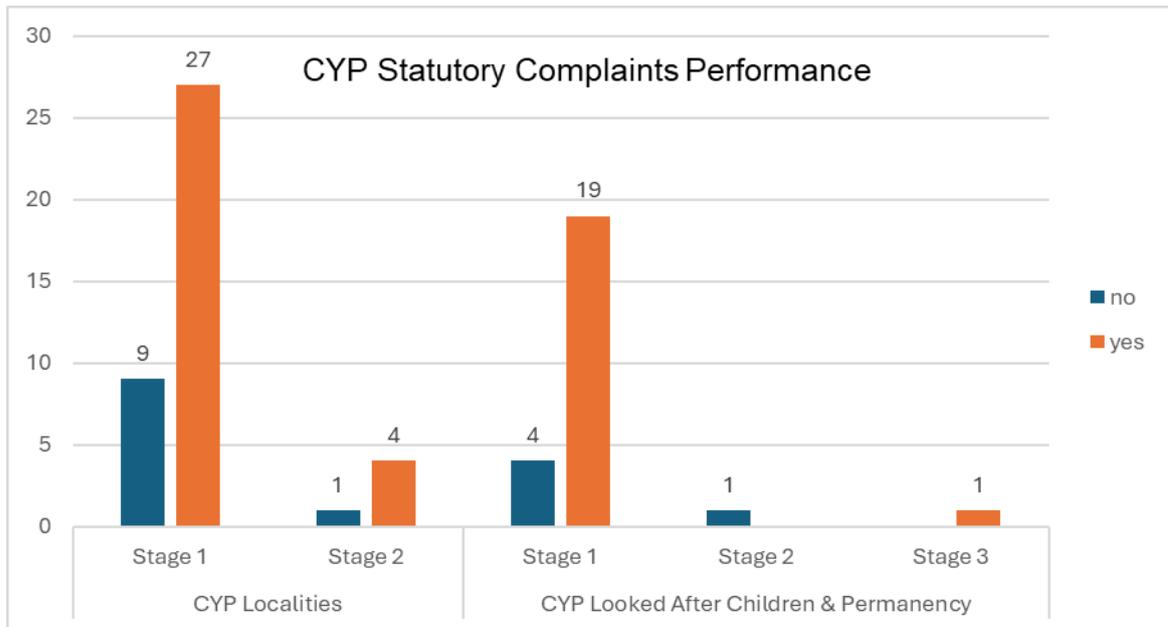
7.3 Complaints concerning parents who are in a conflict situation, with regards to access and care of their children, are on the rise. Usually this has been where the partners disagree about the care the child or children are receiving from the other parent. Some feel that the Child and Family Assessment or court reports are not completed in an impartial way and that the social worker has failed to communicate with them at an early enough stage in proceedings. This presents a challenge for social workers who must find a balanced approach through these relationships.

7.4 Examples of the types of root causes of complaints that arise are listed below: -

- ***Alleged poor staff attitude*** - much of the work of Localities staff involves them taking actions in connection with highly sensitive child protection or child in need issues, which parents or carers may often disagree with. There have been a number of comments about social workers where the family member perceives a bias, leading to complaints about the alleged impartiality of assessments.
- ***Service failure*** - on completion of a Child and Family Assessment, or reports to the Initial Child Protection Conference, social workers had not kept all the interested parties updated with the completed assessment and reports. In addition to this, not all parties agree to the information within reports which has been recorded as 'not up to standard.'
- ***Looked After Children*** - the main area of complaints related to leaving care. Most of the root causes are recorded as young people not being kept informed. This suggests the need for more awareness around time scales and procedures which need to be made clearer to customers.

8. Timeliness of Responses

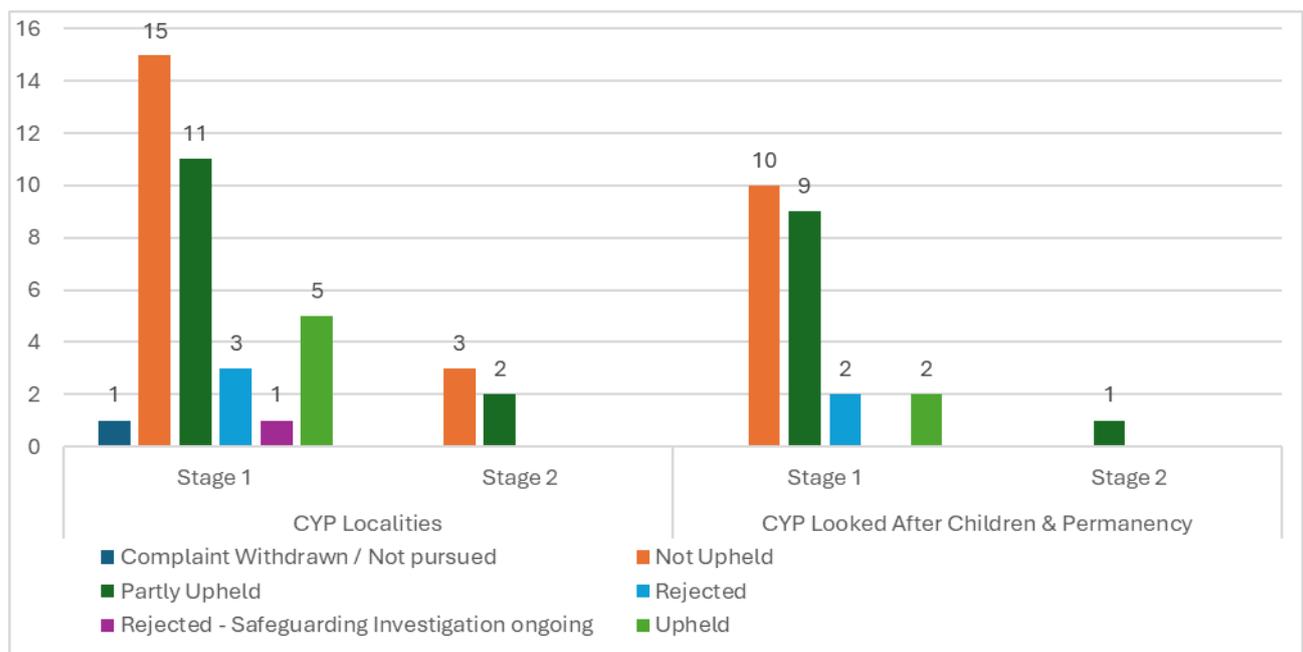
8.1 The Council responded to 78% of all children's statutory complaints within the appropriate timescales. This is a decrease of 16% compared to the previous year. However, there is a significant increase in cases received compared to the previous year.



8.2 It is important to note that the statutory children’s complaint legislation allows the Complaints Service to extend the target deadline by 10 working days in complex cases.

8.3 In 2024/25, 59 stage 1 statutory complaints were due for a response. The performance rate at stage 1 was 78%, with 46 out of 59 complaints responded to on time, whereas the performance rate for stage 2 complaints increased on last year with 3 out of 5 cases responded to on time. Two cases were overdue due to delays in independent investigators providing their reports as a result of the complexity of the cases. We have since better managed the relationships with the independent investigators to encourage reports being completed in a timely manner.

9. Complaint Outcomes



9.1 There are four possible outcomes for complaints: withdrawn/not pursued/rejected, not upheld, partly upheld and upheld. The chart below shows the outcomes of statutory complaints at stage 1, stage 2 and stage 3 in 2024/25 as recorded on the Council's case management system.

The key findings are:

- Of the 59 cases closed at stage 1 during 2024/25, the Council found some merit in 46% of complaints with 27 complaints either upheld or partly upheld. The percentage is lower than last year however the number of complaints that were upheld or partly upheld remains the same. A not upheld outcome was decided in 25 cases at stage 1.
- The Council closed 5 stage 2 statutory complaints during 2024/25 which is one less than the previous year. Three complaints were not upheld and two were partly upheld.
- In 2024/25 one stage 3 panel was completed, which was not upheld. We received two stage 3 panel requests in 2024/25 however these will be closed in the new financial year.

10. Analysis and Learning from Complaints

10.1 Lessons learnt from complaints can help shape and improve services and the customer experience. CYP managers and staff are committed to using this learning to improve outcomes for service users.

10.2 Detailed below is a summary of the cases escalated to stage 2 and where a detailed investigation was undertaken. It also includes any learning points and service improvements identified as a result of the complaint. The Council wishes to learn from its complaints and improve the service it provides.

10.3 Localities had five stage 2 investigations in 2024/25 which is a significant increase from last year where there was only one case. The reason for the influx is due to the changes in care packages across the Children with Disabilities service. The recommendations resulting from these complaints included:

- It was strongly recommended that the Council arrange training for its SEND staff around ceasing EHCPs and ensuring officers fully understand their duties with regards to consulting young people and their parents/carers.
- Following Resource Panels, such as the 18 Plus Panel, decision letters should be sent to service users' families. These letters should clearly outline the rationale for any changes to the support plan and also provide details as to how families can appeal the panel's decision
- Children's Service undertakes an audit of the information provided to parents in regard to the Resource Allocation System (RAS) questionnaire to establish if some parents were provided with the incomplete document. If this is found to be the case then appropriate action should then be taken to address this issue with parents.

- Mandatory staff training/updating to be implemented in regard to the application of the RAS tool.

10.4 Looked after Children and Permanency had one stage 2 investigation. This case related to the lack of support from Children Services following a full care order which resulted in siblings being placed with different foster carers. The recommendations included:

- A review of the relationship between Children Services and the Finance Team in regard to the payment of subsistence allowance to young people.
- Staff were reminded to ensure that young people who are eligible for a Pathway Plan shortly after their 16th birthday are fully involved in the drafting of the plan and their voice is fully represented within this document.
- Children Services must ensure that all young people have a fully allocated Personal Assistant before their 18th birthday.

10.5 There was a single stage 3 review panel adjudication during the year, a summary of which is provided below:

- The complainant raised various concerns regarding the lack of support received by the Leaving Care Team mainly around support with making a Legal Claim for compensation following a road traffic accident. LAC were unable to support him with this due to liability concerns as advised by our Legal Team. The complainant also raised concerns about support for Housing however the concerns he raised fell within Housing's remit rather than CYP.

11. Local Government and Social Care Ombudsman (LGSCO) Decisions in 2024/25

11.1 There were fifteen corporate and statutory Education & Children's Services complaints escalated in 2024/25 which is nine less complaints than the previous year 2023/24. The LGSCO made decisions on twelve cases during 2024/25 of which five were closed after initial enquiries were made, one was invalid/incomplete, three were referred back to the Council for local resolution, and three were upheld. In summary, from the twelve cases decided, fault was found in three of the cases, which provides a 25% uphold rate. This is more than last year where the uphold rate was 14% however there were 10 more detailed investigations undertaken in 2023/24.

11.2 Two of the cases upheld fall under the corporate complaints process so are summarised in the covering Annual Complaints Report. The statutory complaint that was upheld related to services provided to a former looked after child. The Ombudsman found fault in delays in the administration of the children's statutory complaints procedure. The Ombudsman recommended £200 compensation for the frustration this caused, as well as a reminder to relevant officers of the need to complete the children's statutory complaints procedure within the statutory

timescales. The delays in completing this complaint were due to the Complaints Service attempting to mediate a resolution by meeting with the complainant and his advocate as some aspects of the complaint did not fall within Children Services.

12. Compensation

12.1 Children’s Social Care awarded a total of £4,715 in compensation in 2024/25 across ten cases. This is a decrease of 25.5% from £6,095 which was awarded in 2023/24, across ten cases. This breaks down as follows:

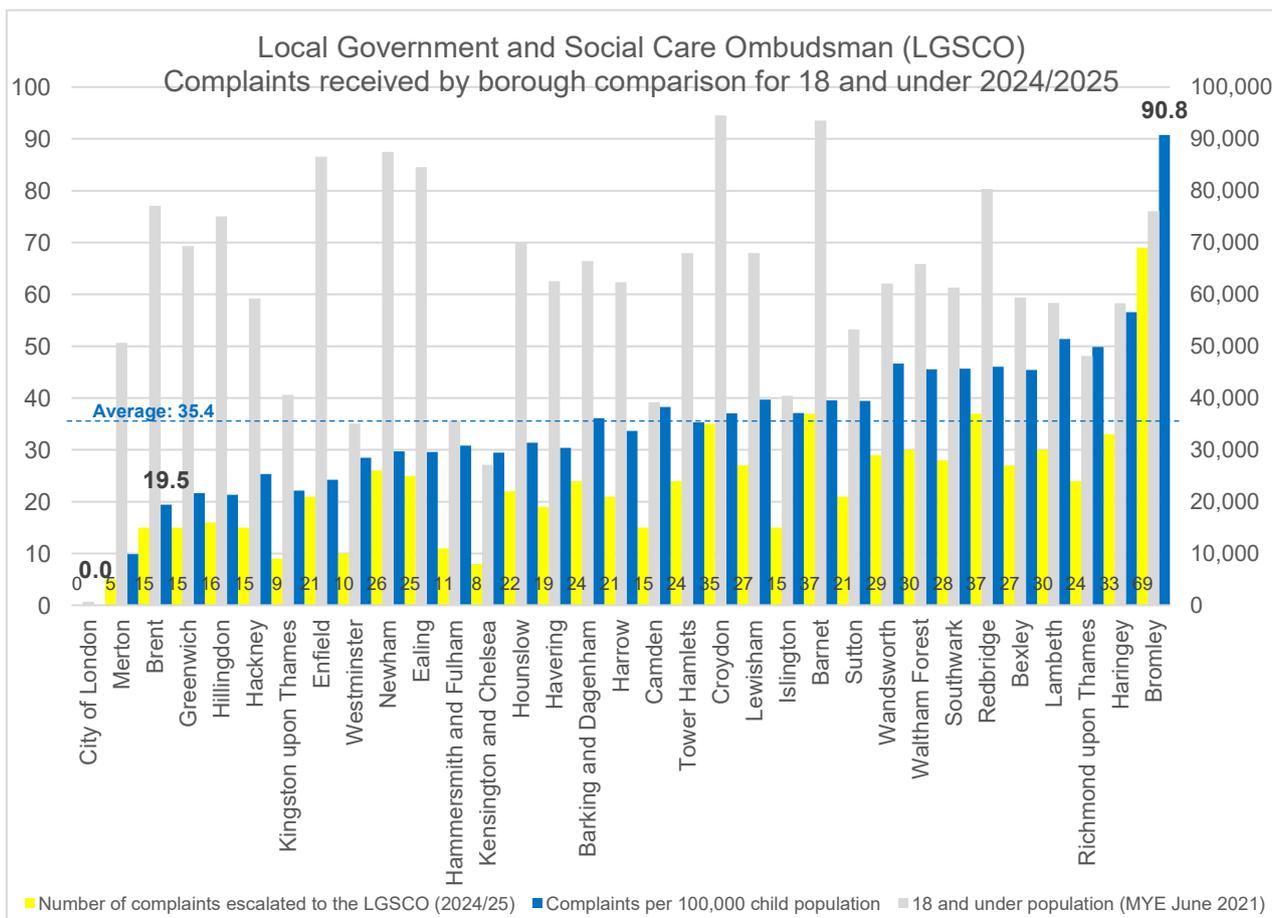
- A total of £2,065 was offered in three cases at stage 1 of the statutory complaints procedure. The compensation was paid for delays in making savings payments to a young person, delays in providing services and costs incurred.
- A total of £2,450 was paid out at stage 2 across six cases. In five of these cases, compensation was paid due to a failure or delay in providing a service. In one case compensation was paid due to time and trouble. There was also one case where £250 was awarded for complaint handling errors at stage 1 and issues not being identified prior to the stage 2 request.
- The Ombudsman awarded £200 on a case for delays during the stage 2 and 3 process which were as a result of sourcing independent investigators and mediation attempts with the young person and his advocate.

Children’s Social Care	Amount
Stage 1	£2,065
Stage 2	£2,450
Stage 3	£0
Ombudsman	£200
Total	£4,715

13. Benchmarking

13.1 Brent Council belongs to the North West London Social Care Complaint Managers Group. The majority of Councils have not yet completed their Annual Complaints report or have chosen not to share data. Comparative data has therefore been provided below on Education and Children’s services cases that were received by the LGSCO during 2024/2025. Data from the Office of National Statistics for 2021 was also used to illustrate the number of complaints received relative to size of population of children within each borough. The average for all London Councils is 35.4 per 100,000 population whereas Brent is 19.5.

13.2 This means that Brent Council is performing better than average and better than all London Councils bar the City of London (which didn’t receive any complaints) and Merton for complaints received by the LGSCO when compared to its projected population in 2021 of children 18 and under. There were 15 complaints escalated to the LGSCO in relation to Education and Children’s Services in 2024/2025, which is a decrease of nine complaints compared to 2023/2024. Out of all the London Councils, Brent were joint 7th with Greenwich, Hackney, Camden, and Islington with the least amount of complaints escalated to the Ombudsman. The estimated population for children 18 and under within Brent for mid-year 2021 was 77,113.



14. Compliments

14.1 The Service doesn't just learn from complaints. Positive feedback can also provide useful insights. In the period covered by this report, the Children and Young People department logged 49 compliments on the Council's complaints and compliments database, which is fewer than those logged than the previous year. Managers are encouraged to log all compliments they receive. CYP Good News is a regular forum where CYP staff hear about, celebrate and learn from positive feedback.

The Complaints Team are currently working with the Digital Team to implement a compliments section so that service users can log this via MyAccount in the same manner as logging a complaint or service request.

Below are examples of some of the compliments received in 2024/25.

- **Localities – East Locality team**

My name is xxx and we met briefly today in a call about a child whose care is shared care by GOSH. I am one of the nurses.

This is going to sound very strange, however I felt compelled to email you after our meeting. I just wanted to say that in my current job, I have worked with a lot of local teams, social workers, local authority workers etc – and today was the first time I felt heard. You have a really great manner about you and you felt really

approachable, and I left today's meeting feeling valued, heard and hopeful that we are doing the right thing – which is a first for any patient I have cared for!

You took time to understand the medical background and gave everyone a platform to share concerns. It was really clear that you have a lot of expertise and it was so helpful to hear everything you had to say as it helped me understand the situation we are. Hearing your ideas were really enlightening and I feel like I learned something today. I just wanted to say that I am really glad to be working with you on this and look forward to speaking to you again. Thank you – and I hope this wasn't really weird!

- **Early Help – Early Years**

My name is xxx, and I am a parent who regularly attends sessions at the Family Wellbeing Centre. I want to take a moment to share my feedback as a way of giving back for the invaluable support I have received.

I first learned about the Family Wellbeing Centre (FWC) through my health visitor during my daughter's one-year review. As a first-time mom without much support in the UK, I was looking for a space that could provide me with both guidance and community. From the moment I started attending the sessions, I found them incredibly helpful, enjoyable, and supportive.

One person who really stood out to me was xxx, who gave me invaluable advice on potty training—a challenge that had been weighing heavily on me, especially with my second child on the way. Her guidance helped me feel much more confident in navigating this new phase.

I also received great support from xxx, who were incredibly culturally sensitive in their approach. Their understanding and respectful support made me feel truly appreciated and seen.

Before coming to the FWC, I often felt isolated on this journey of motherhood, but the support I received there made all the difference. I felt looked after, and it gave me a sense of belonging. My child loves the messy play sessions, which we regularly attend, and it's clear she enjoys them just as much as I do.

Even though I travel 30-40 minutes to reach the centre, it's worth every moment because of the value and support it brings to both me and my child. The FWC has truly played a key role in building my confidence as a mother and giving my child a space to grow and explore.

- **Looked after Children & Permanency**

I would like to express my sincere gratitude and appreciation for all your great efforts and continuous support. Today's court sessions went well, and we are very happy with the outcome. We truly appreciate your dedication, the well-structured plan you implemented, and the positive impact it has had. Rest assured that you will always be a source of trust and will diligently follow all your guidance.

Once again, thank you for your hard work and ongoing support

- **Localities – NRPF and Homeless Team**

I wanted to take a moment to express my deepest gratitude for all the support and care you have provided to me and my daughters during the summer holidays. Despite the short period of just two weeks, your assistance has made an incredible difference in our lives, and I am truly grateful for everything you've done. From the very beginning, you have gone above and beyond in your role as our social worker, always checking in on us and working tirelessly to communicate with the council on our behalf. Your dedication to ensuring that we have suitable accommodation has been nothing short of remarkable.

You are, without a doubt, the best social worker my family and I have ever encountered since moving to London. The level of commitment, compassion, and professionalism you have shown in such a brief time is truly exceptional, and I often find myself wishing there were even stronger words to express just how highly I think of you. You have earned my deepest respect and sincere gratitude, and I believe it's important to give credit where it is due—xxxx, you have been a lifeline for us during a very challenging time. My daughters, too, have been greatly impacted by your kindness and support. They often ask about you, and it's clear they feel a sense of safety and happiness because of your presence in our lives. They speak so fondly of you, and it's heartwarming to see how much your efforts have positively influenced them. Your ability to connect with them and provide reassurance has been invaluable, and I cannot thank you enough for the sense of stability you have brought into their lives.

What stands out to me most is the way you've gone out of your way to communicate with us and Westminster council even after your shifts, to ensure we had a safe and secure place to sleep. Your dedication to your work and to the well-being of my family is something I will never forget. You did so much especially in such a short time and I am eternally grateful.

I was hoping to see you before you transfer us to Camden social service or Westminster, but I understand how incredibly busy you must be, especially with the numerous families and individuals who rely on your support. I know that your time and energy are in high demand, and it's entirely understandable. I just wanted to make sure you know how much we appreciate everything you've done for us.

Thank you once again, xxxx, for being such a remarkable support system for my family and me. Your dedication, kindness, and professionalism have made an immeasurable difference in our lives, even within just two weeks, and I will always be grateful for your help. My daughters and I are fortunate to have had you by our side, and I wish you all the best in your continued work.

With heartfelt appreciation,

- **Inclusion – SEND Service**

I would like to say a big thank you from the bottom of my heart for your perseverance and putting up with my constant bombarding of emails . I am actually crying with joy to hear today's news one because finally xxxx has got somewhere where there will be a sense of belonging and not segregated all the time . Think today was the last straw of having to deal with an executive head that has done nothing but complain about funding and all negativity regarding xxxx . I felt like today was a threat when said gonna permanently exclude or I agree to name of school coming of the EHCP plan. I can now relax knowing that will hopefully go into a new environment that will bring the best out of him. Ek outreach have done nothing but compliment Kasey. I hope you both have a lovely weekend .

Once again as the happiest ever mother right now that has had a very long journey and feeling like I have harassed you .

- **Early Help – Early Years**

To all the team at Three Trees,

I just want to say a big thank you for all the amazing support you give to our families at Anson Primary.

It is so reassuring to know that when I make an EH referral, you are at the other end. Having an open channel of communication is key and so often, we raise concerns about our families and never know the outcome or what support they are receiving. That is not the case with Three Trees - all I have to do is ask and you are there with answers.

C has been so supportive to me as a new-to-the-job DSL, and that has really helped my confidence to grow. From welcoming me into the Three Trees Centre and explaining all they have to offer to presenting parent coffee mornings - she has helped to make Anson a place where families feel heard and supported.

I have also had the pleasure of working with J - she is just brilliant with our families and has such a warm, fun and caring spirit.

P has been fantastic with Global Girls Thinking, which provided well-needed support for one of our Year 6 students and also recently demonstrated just how effective the triage system is working, when she was instrumental in helping one of our families in crisis. A single mum with three children was about to be made homeless, so I advised her to go to the triage service at Three Trees for help and Pauline helped her to secure a new home for her family and a crisis was averted without a need to escalate to an EH referral.

Well done to all of you that make Three Trees the success that it is!

Appendix C – LGSCO Comparison with other London Authorities

Authority Name	Population (estimated)*	Referrals to LGSCO	Detailed Investigations	Upheld	Avg upheld decisions per 100,000 residents	Uphold Rate	Remedy Rate
Barking and Dagenham	218,534	134	19	18	8.1	95%	6%
Barnet	388,639	187	32	26	6.6	81%	8%
Bexley	246,543	80	17	11	4.4	65%	9%
Brent	338,918	138	24	21	6.1	88%	33%
Bromley	329,830	173	43	38	11.5	88%	8%
Camden	210,390	145	20	18	8.1	90%	11%
City of London	8,618	7	2	1	7.4	50%	0%
Croydon	390,506	218	36	32	8	89%	13%
Ealing	366,127	166	22	16	4.3	73%	6%
Enfield	329,601	178	41	32	9.8	78%	0%
Greenwich	289,254	110	12	10	3.4	83%	20%
Hackney	259,956	138	26	22	8.4	85%	23%
Hammersmith and Fulham	183,295	95	14	13	7	93%	31%
Haringey	264,130	264	61	53	20.2	87%	13%
Harrow	260,987	122	15	12	4.6	80%	0%
Havering	262,022	118	19	16	6	84%	19%
Hillingdon	304,792	121	25	23	7.2	92%	4%
Hounslow	287,940	151	34	26	8.8	76%	8%
Islington	216,767	131	34	30	13.6	88%	23%
Kensington and Chelsea	143,940	90	32	27	18.3	84%	11%
Kingston upon Thames	167,845	71	16	14	8.2	88%	14%
Lambeth	317,498	309	63	58	18.4	92%	7%
Lewisham	299,810	174	42	37	12.4	88%	3%
Merton	215,324	69	14	13	6	93%	15%
Newham	350,626	206	40	35	9.7	88%	29%
Redbridge	309,836	169	44	40	12.8	91%	15%
Richmond upon Thames	195,232	75	9	8	4.1	89%	38%
Southwark	306,374	248	57	52	16.5	91%	13%
Sutton	209,517	86	22	13	6.2	84%	8%
Tower Hamlets	312,273	211	52	43	13.1	83%	2%
Waltham Forest	278,050	160	30	21	7.6	70%	5%
Wandsworth	328,367	140	23	18	5.4	78%	11%
Westminster	205,087	116	22	15	7.1	68%	7%

Key: Outer London Inner London

*As per the Office of National Statistics' Mid-Year Estimates June 2021

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	<p align="center">Council Management Team 13 August 2025</p>
	<p align="center">Report from the Corporate Director of Finance and Resources</p>
	<p align="center">Lead Cabinet Member - Cabinet Member for Housing and Residents Services, (Cllr. Fleur Donnelly-Jackson)</p>
<p align="center">Housing Management Complaints Performance and Service Improvement Annual Report 2024/2025</p>	
Wards Affected:	All
Key or Non-Key Decision:	Non-Key Decision
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>Appendix 1 – Housing Ombudsman’s performance report for Brent 2023/2024</p> <p>Appendix 2 – Council’s Self-Assessment against the Housing Ombudsman’s Complaint Handling Code</p> <p>Appendix 3 – Knowledge and Information Management spotlight report</p> <p>Appendix 4 – Attitudes, Respect and Rights spotlight report</p> <p>Appendix 5 - Council’s updated Complaints Policy</p>
Background Papers:	N/A
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Amira Nassr Deputy Director, Democratic & Corporate Governance Brent Council

1.0 Executive Summary

1.1 This annual report sets out complaints performance for the Housing Management service for the period 1 April 2024 to 31 March 2025. The report focuses on volumes of complaints, complaint outcomes, compensation offered, nature of complaints and learning and service improvements as a result. Complaints regarding housing management fall under the Housing Ombudsman and therefore a separate report has been prepared for this purpose.

1.2 The report also contains the Housing Ombudsman’s performance report for Brent for 2023/2024 (Appendix 1) and the Council’s self-assessment against the Housing Ombudsman’s Complaint Handling Code (Appendix 2).

2.0 Recommendation(s)

- 2.1 CMT are asked to note Brent Housing Management's performance in managing and resolving complaints.
- 2.2 CMT are asked to note, and review Brent's latest self-assessment against the Housing Ombudsman's updated Complaint Handling Code.
- 2.3 CMT are asked to note and review the latest updates to the Council's Complaints Policy.
- 2.4 CMT are asked to approve progressing the report to Cabinet and the relevant Scrutiny Committees.

3.0 Background

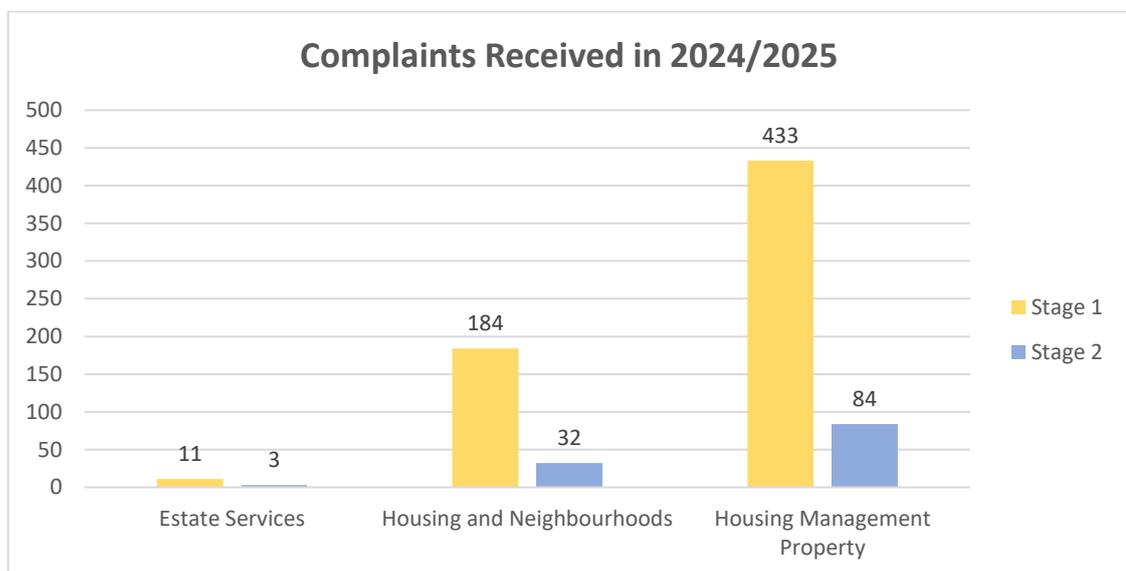
- 3.0.1 The Council's corporate complaints fall under two separate governing bodies, the Housing Ombudsman and the Local Government and Social Care Ombudsman (LGSCO). Complaints relating to Housing Management fall under the Housing Ombudsman and complaints about any other service fall under the LGSCO.
- 3.0.2 This report focusses on complaints that fall under the Housing Ombudsman only.
- 3.0.3 The main performance headlines from Housing Management complaints are as follows:
 - 628 complaints were received at the initial stage of the complaints process in 2024/2025, an increase of 9% on 2023/2024. 119 stage 2 complaints were received in the same period, which is the same as last year.
 - The majority of issues raised related to service failure (77%, 480 complaints) and more specifically delay in a service being provided which accounted for 275 complaints.
 - Many of the complaints were escalated to stage 2, because the complainant did not agree with the decision at stage 1. This was the reason in 39% of cases that were escalated.
 - 206 complaints were upheld at stage 1 and 279 complaints partly upheld which provides a 64% uphold rate.
 - 83% of stage 2 cases were upheld or partially upheld.
 - 65 complaints were rejected at stage 1 and 1 complaint was rejected at stage 2. In 59 of the stage 1 cases, the complaint was rejected because it was a duplicate request or had already been investigated.
 - 96% of all stage 1 Housing Management complaints were responded to on time and 99% of stage 2 complaints were responded to on time.
 - A total of £109,787 was paid out in compensation at stage 1 and 2.

Housing Management Stock

3.0.4 The Housing Management service currently manage 13,482 properties which are a mixture of tenanted and leasehold properties. As a housing landlord, Brent manages 11,076 flats and maisonettes, 2210 houses and bungalows, as well as 196 New Accommodation for Independent Living (NAIL) properties. In addition, the service manages 22 rooms, and 1 gypsy and traveller site with 31 pitches.

Complaints Received

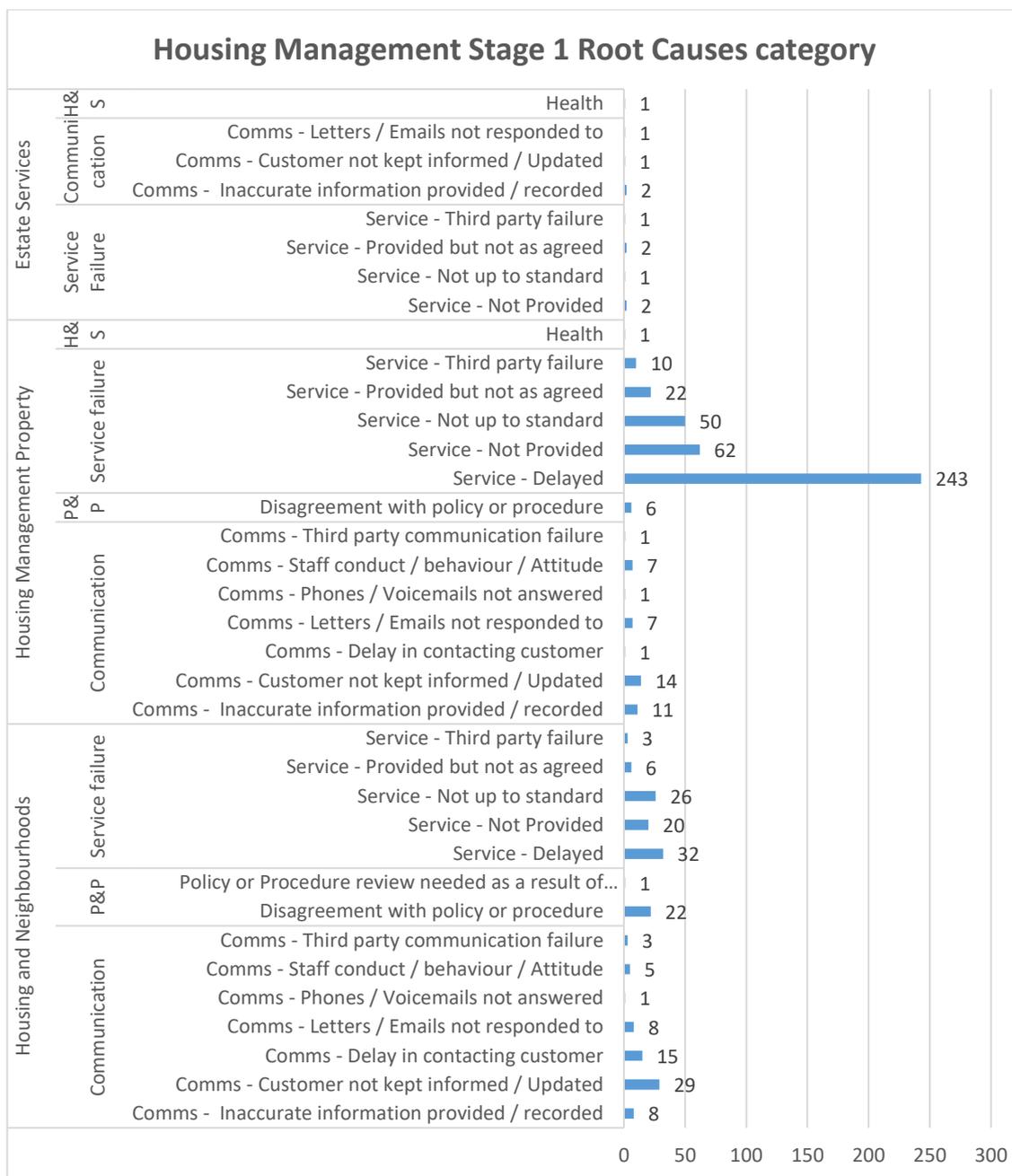
3.0.5 In 2024/2025, the Housing Management service received 628 stage 1 complaints compared to 575 the previous year, which is an increase of 9% (52 complaints).



3.0.6 Estate Services has now moved under the Public Realm directorate and therefore data on complaints for this area has been provided separately. Estate Services received 11 stage 1 complaints and 3 stage 2 complaints in 2024/2025. The escalation rate for complaints received by Estate Services is 27% with 3 out of 11 complaints escalated to stage 2. Housing and Neighbourhoods received 184 stage 1 complaints in 2024/2025 which is 54 more complaints than the previous year albeit Estate Services sat within this department the previous year. In the same period Housing and Neighbourhoods received 32 stage 2 complaints which is 8 less than the previous year. This provides an escalation rate of 17% which is 1% less than the previous year. In 2024/2025, 433 stage 1 complaints were received and 84 stage 2 complaints which is 12 less stage 1 complaints, and 11 less stage 2 complaints compared to the previous year. The escalation rate for Housing Management Property complaints was 19% which is 2% less than the previous year. In 2023/2024 a total of 119 stage 2 complaints were received which is the same number of complaints escalated as 2023/2024 and one more than 2022/2023.

Nature / Reasons for Complaints

- 3.0.7 We record root causes of complaints at stage 1 once a complaint has been closed, therefore we look at the complaints that were closed in 2024/2025 rather than received. This is why the total number of complaints that we have recorded root causes for is 626 which is slightly less than the 628 complaints received at stage 1.
- 3.0.8 The Council classifies root causes of complaints into three main areas: Communication, Policy/Procedures, and Service Failure.
- 3.0.9 The data below shows that for Housing and Neighbourhoods, 49% of complaints (87 out of 179) were due to service failures and that this was primarily related to services being delayed (32 complaints) or service being perceived as not up to standard (26 complaints). Communication issues constituted 39% of the complaints (69 out of 179) which is the same percentage as last year, with the predominant issue being that customers were not kept informed or updated. Policy/procedure was the root cause for 13% of complaints for Housing and Neighbourhoods. All but one complaint in this category disagreed with the policy or procedure that was in place.
- 3.0.10 In comparison, for Housing Management Property, 89% of complaints (387 out of 436) were due to service failures which is similar to the percentage last year, with delays in service provision continuing to be the main issue (243 complaints, 63% in this category). The second highest root cause for Housing Management Property was communication. Communication issues made up 10% of the complaints (42 complaints) and this mainly related to the resident not being kept informed or updated (14 complaints, 33% in this category), and inaccurate information provided or recorded (11 complaints, 26% in this category). Issues with policy/procedure were less prevalent at 1% with 6 complaints disagreeing with the policy or procedure in place which is the same as last year.
- 3.0.11 In 2024/2025, 11 Estate Services complaints were closed, 6 complaints related to service failure, 4 complaints related to communication and one complaint related to Health. There were no complaints received which related to policy or procedure.
- 3.0.12 Overall, across Housing Management, service failure was the most common root cause for complaints. Service failure accounted for 77% of all complaints received at stage 1 (480 out of 626). Service being delayed was the most common cause of complaints within this category with 275 complaints. Service Failure being the main reason for complaints remains consistent with other local authorities.
- 3.0.13 Communication issues accounted for 18% of the overall complaints (115 complaints), policy/procedure issues accounted for 5% (29 complaints) and Health accounted for less than 1% with only two complaints received, however this is a new category that has been introduced so there will likely be more complaints categorised in this category next year.



3.0.14 A list of the specific issue types that complaints were categorised under has been provided below to provide more context and further analysis.

Root cause and issue type	Number of complaints
Service Failure	480
Repairs To My Property (Including Inspections)	123
Outstanding Repairs - Other	100
Communal Repair	59
Damp and/or mould	43
Housing Customer - Other	27
Anti - Social Behaviour	20
Complaints about Wates	16
Leasehold Enquiries	13

Gas Safety	8
Asbestos Safety	6
Electrical Safety	6
Estate Services	6
Planned Maintenance Of My Property	6
Service Failure	6
Communal Cleaning	4
Complaints about PS Staff	4
Poor Customer Service	4
Right To Buy	4
Complaints about Oakray	3
Grounds Maintenance	3
Water Safety	3
Billing	2
Lettable standard	2
Arrears	1
Banding	1
Bedroom Entitlement	1
Cleaning schedule	1
Estate Parking	1
Lettings process	1
Lift Safety	1
My New Home	1
My Personal & Household Details	1
Overcrowding	1
Rent Refund	1
Tree Maintenance	1
Communication	115
Housing Customer - Other	25
Anti - Social Behaviour	15
Outstanding Repairs - Other	11
Repairs To My Property (Including Inspections)	10
Communal Repair	8
Grounds Maintenance	7
Water Safety	5
Estate Services	4
Poor Customer Service	4
Complaints about PS Staff	3
Sound Insulation	3
Communal Cleaning	2
Complaints about Wates	2
Leasehold Enquiries	2
Noise Nuisance	2
Parking	2
Arrears	1
Asbestos Safety	1
Banding	1
Electrical Safety	1

Estate Parking	1
Overcrowding	1
Payment / Arrears	1
Rent Refund	1
Right To Buy	1
Service Failure	1
Policy / Procedures	29
Arrears	5
Repairs To My Property (Including Inspections)	5
Anti - Social Behaviour	4
Payment / Arrears	4
Housing Customer - Other	2
Parking	2
Rent Refund	2
Billing	1
My Personal & Household Details	1
Outstanding Repairs - Other	1
Poor Customer Service	1
Right To Buy	1
Health	2
Communal Cleaning	1
Repairs To My Property (Including Inspections)	1
Grand Total	626

Reasons for escalation

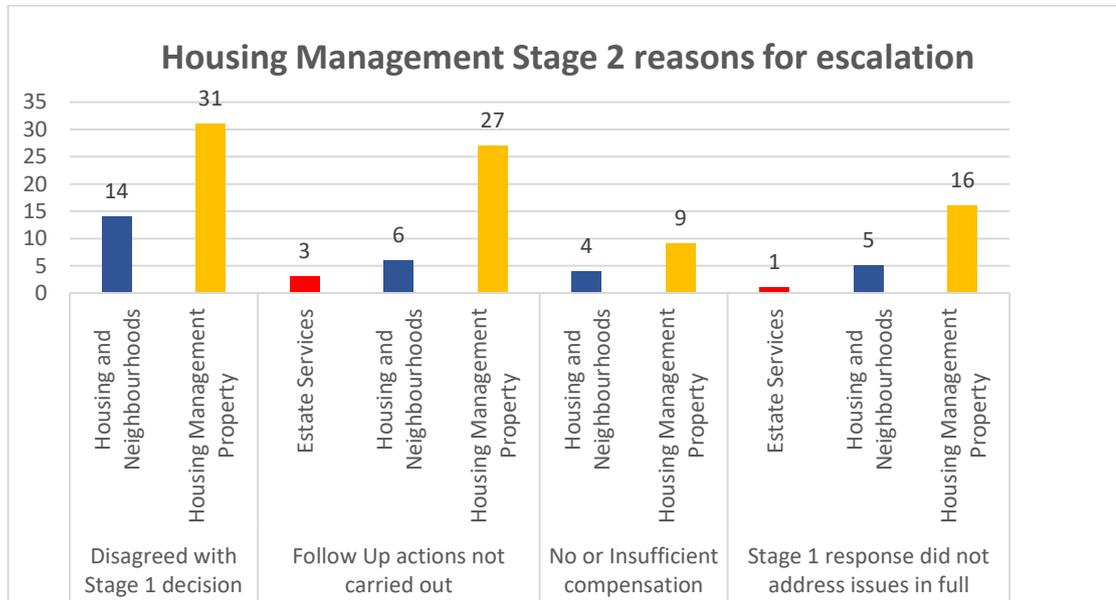
3.0.15 In 2024/2025, 29 escalated complaints were closed for Housing and Neighbourhoods. The most frequent reason for escalation was disagreement with the stage 1 decision, accounting for 48% of complaints. Other reasons included follow-up actions not being carried out (6 complaints, 21%), the stage 1 response did not address issues in full (5 complaints, 17%), and that no or insufficient compensation (4 complaints, 14%) was offered.

3.0.16 There were 83 escalated complaints closed for Housing Management Property. Similar to Housing and Neighbourhoods, the leading reason for escalation was disagreement with the stage 1 decision, which had 31 complaints and accounted for 37% of the escalated complaints. The second reason was follow-up actions were not carried out which was closely behind with 27 complaints, which accounted for 33% escalations. Additional reasons were the stage 1 response did not address the issues in full (16 complaints, 19%), and that no or insufficient compensation was awarded at stage 1 (9 complaints, 11%).

3.0.17 Four escalated complaints were closed in 2024/2025 for Estate Services with the reasons for escalation being follow up actions not carried out (3 complaints, 75%) and the Stage 1 response did not address issues in full (1 complaint, 25%)

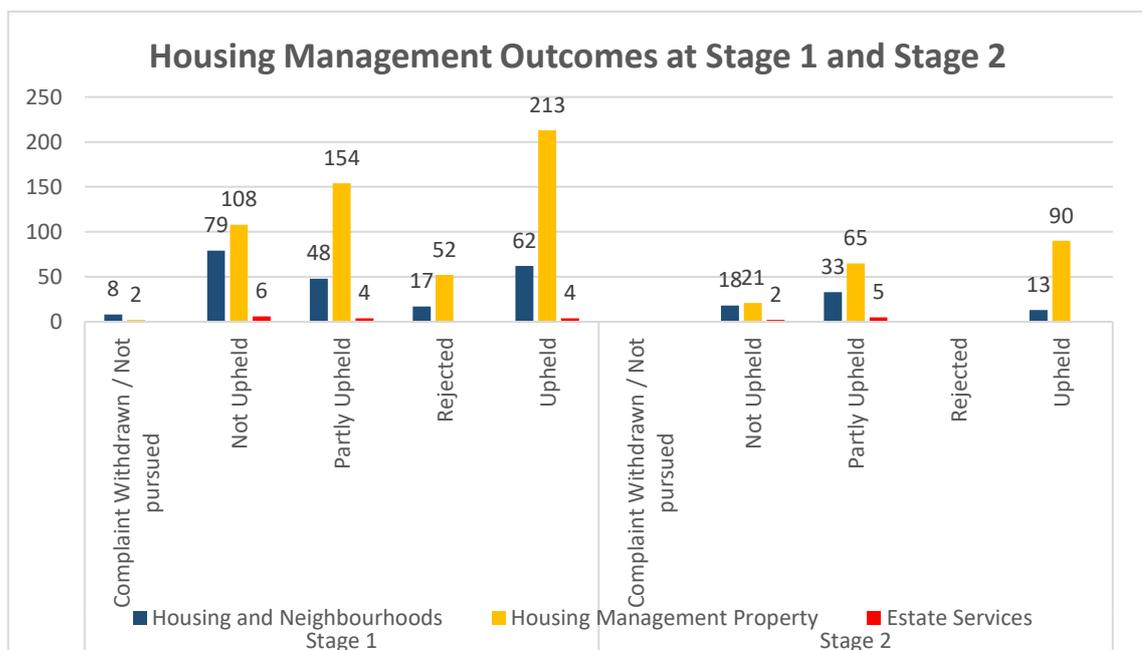
3.0.18 Overall, 116 complaints that were escalated to stage 2 were closed in 2024/2025. The most common reason for escalation was disagreement with

the stage 1 decision, with 45 complaints (39% of all complaints), followed by follow up actions not being carried out, 36 complaints (31% of all complaints), Stage 1 response did not address issues in full, with 22 complaints (19% of all complaints) and no or Insufficient compensation, with 13 complaints (11% of all complaints).



Complaint Outcomes

3.0.19 The chart below shows the outcome of complaints at stage 1 and final review stage:



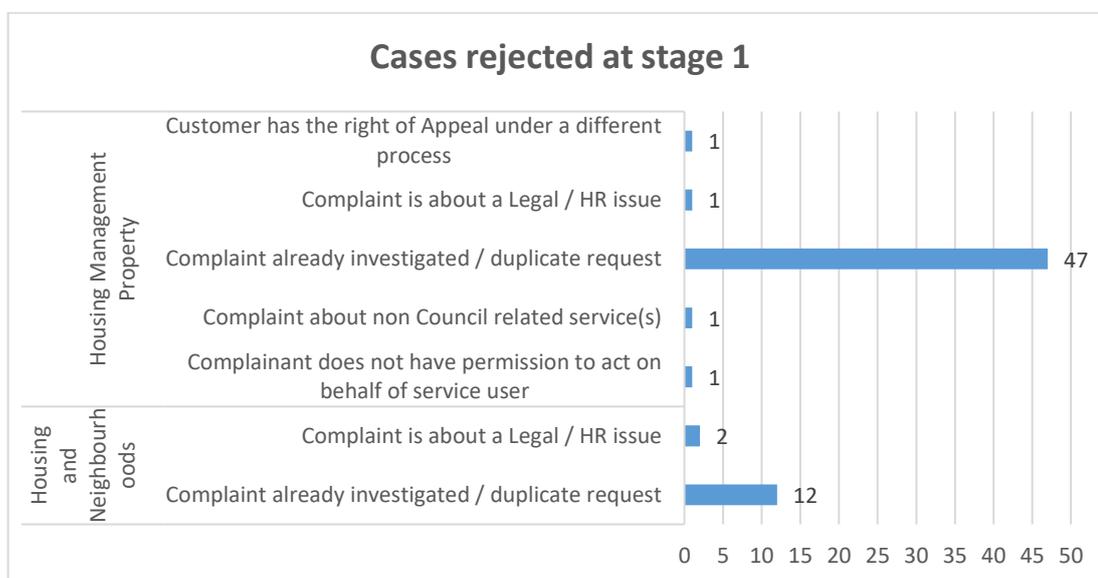
- 3.0.20 The Council has the following outcomes that can be selected on the Council's complaints system: Upheld, Partly Upheld, Not Upheld, Rejected and Complaint Withdrawn/Not pursued. Where a complaint is partly upheld, this means that there may have been an aspect of the complaint that was upheld but the main substance of the complaint was not upheld. This allows for better analysis to be carried out as to why complaints are upheld. However all complaints that are upheld or partly upheld are deemed upheld as there has still been some fault on the part of the Council.
- 3.0.21 At stage 1 of the complaints process, for Housing and Neighbourhoods, 48 complaints were partly upheld (22%) and 62 were upheld (29%), resulting in 51% of complaints being either upheld or partly upheld overall. Although this is similar to last year percentage wise, there were 110 complaints upheld or partly upheld compared to 66 in 2023/2024.
- 3.0.22 For Housing Management Property at stage 1, 154 complaints were partly upheld (29%) compared to 46 the previous year which equated to 10%. There were 213 upheld complaints (40%) compared to 270 complaints last year with an overall rate of 58%. Overall, 329 complaints were upheld or partly upheld in 2024/2025 resulting in a 69% uphold rate.
- 3.0.23 Estate Services closed 14 complaints in 2024/2025, partly upholding and upholding an equal number of complaints (4 complaints) providing an uphold rate of 57%.
- 3.0.24 Overall, 485 complaints were upheld out of 757 complaints closed in 2024/2025. This results in a 64% uphold rate which is an increase of 5% compared to 2023/2024.
- 3.0.25 At stage 2, for Housing and Neighbourhoods, 33 complaints were partly upheld (52%) and 13 were upheld (20%), meaning 72% of complaints were upheld or partly upheld.
- 3.0.26 For Housing Management Property, 65 complaints were partly upheld (37%) and 90 were upheld (51%). This means 88% of complaints were upheld or partly upheld which is the same as the previous year.
- 3.0.27 For Estate Services, 5 complaints were partly upheld and 2 complaints were not upheld at stage 2. This provides an uphold rate of 71%.
- 3.0.28 Overall, 83% of stage 2 complaints were upheld or partly upheld. This is a 5% increase from the previous year.
- 3.0.29 This again shows that there is a 19% increase in the complaints being upheld or partly upheld from stage 1 to stage 2 (same as last year). When looking at the stage 2 cases closed in 2024/2025 and comparing the stage 1 outcome with the stage 2 outcome, 21 complaints that were decided as not upheld were subsequently partly upheld or upheld at stage 2. This was broken down into 1 Estate Services complaint, 7 Housing and Neighbourhood complaints and 13 Housing Management Property complaints. This indicates that Housing

Management need to review the complaints more openly and accept where things have gone wrong and work to remedy the complaint to avoid escalation to stage 2.

3.0.30 The Complaints Service circulates all stage 2 responses to officers that were involved in the complaint investigation and the officer that responded at stage 1 so that stage 1 responses can be improved and lessons learnt.

3.0.31 Some service improvements identified at the final review stage have been included in point 14 - Learning from Complaints.

Complaints Rejected



3.0.32 At stage 1, 65 complaints were rejected which is more than the 47 that were rejected last year. As seen in the chart above, the main reason for this was that the complaint had already been investigated or there was a duplicate complaint request. Residents are required to email the Complaints Service to escalate their complaints to stage 2 of the Council's complaint procedure however some residents raise the same complaint on the complaints database. We therefore need to reject the complaint on the database and escalate the original complaint to avoid duplication. Some residents will also try to raise the same complaint again although their complaint has already been through the complaints procedure. In this scenario, they would need to escalate their complaint further by approaching the Housing Ombudsman to make a final decision on the complaint. This was the reason for 91% of complaints rejected and for 59 complaint rejections overall across the Housing Management Services.

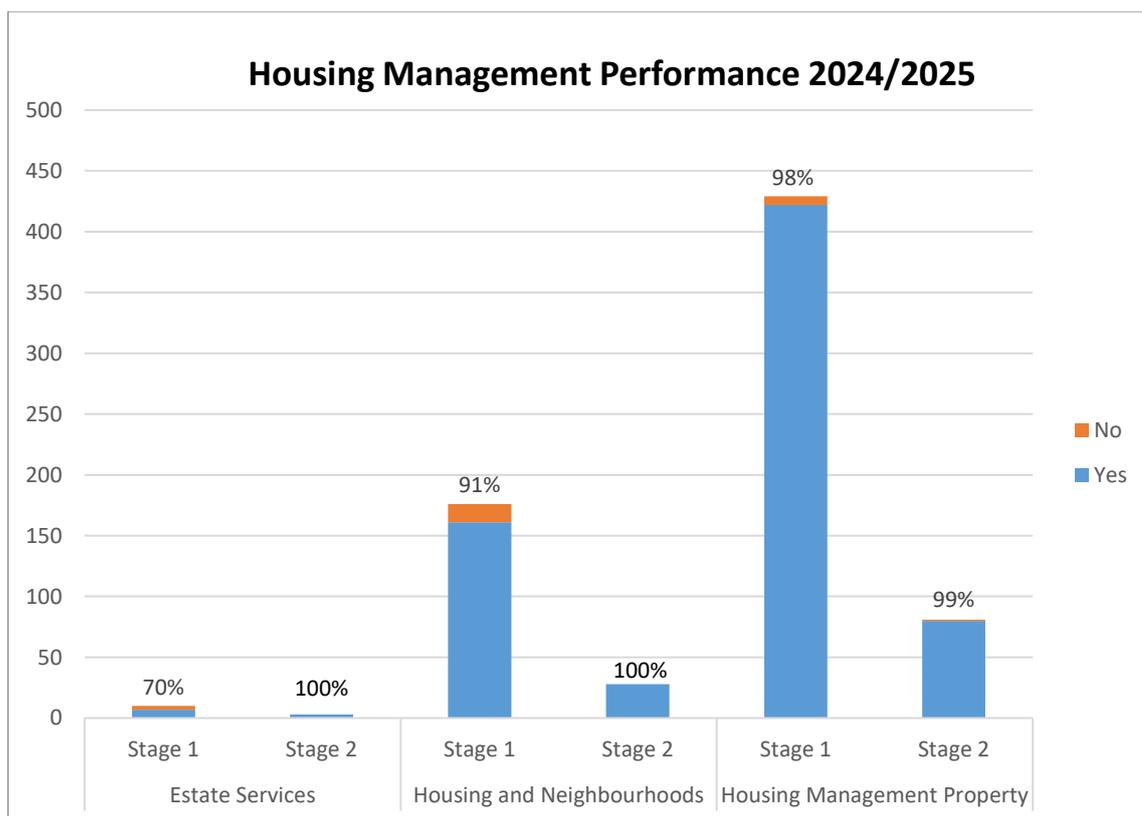
3.0.33 In addition, three complaints were rejected due to being about Legal or HR issues and therefore were investigated through different routes. Where the matter is already in Court, the Council is unable to investigate the complaint. Other reasons that cases were rejected included one complaint relating to non-Council related services, one complaint where the complainant did not have

consent to raise the complaint on behalf of the resident, and another complaint where there was a more appropriate avenue through an appeals process.

3.0.34 There was one escalation that was rejected as a response had already been provided under a separate complaint and therefore was a duplicate request.

Timeliness of Responses

3.0.35 The chart below shows complaint response times across the Housing Management Service in 2024/2025:



3.0.36 In 2024/2025, at stage 1, 98% of complaints from Housing Management Property were responded to on time, while 91% of Housing and Neighbourhoods complaints were responded to on time and 70% of Estate Services complaints were responded to within the expected timeframe. At stage 2, 99% of Housing Management Property complaints were responded to on time which is an increase of 3% compared with last year, and 100% of Housing and Neighbourhoods complaints and Estate Services complaints were responded to on time.

3.0.37 At stage 1, out of the 615 complaints due across the Housing Management Service, 590 were responded to on time. Of the 25 cases that were responded to outside of the relevant timescales, 10 were closed within two days of the deadline and 7 were closed within 1 day of the deadline. At stage 2, 99% of complaints were responded to on time, with this being the case for 111 of the 112 complaints due overall, so only one went outside of the required timescales. This was a complex case which eventually was escalated to the

Housing Ombudsman. The Ombudsman decided that the Council had satisfactorily resolved the resident's complaint and no further action was required.

Compensation

	Estate Services		Housing and Neighbourhoods		Housing Management Property	
	Total number of cases	Amount	Total number of cases	Amount	Total number of cases	Amount
Stage 1	0	£0	39	£7,489	221	£53,408
Stage 2	1	£50	16	£7,355	76	£41,485
Total	1	£50	55	£14,844	297	£94,893

3.0.38 One case involving Estate Services resulted in a £50 compensation payment at stage 2. The Housing and Neighbourhoods service issued similar compensation amounts at both stage 1 and stage 2; however, more than twice as many cases received compensation at stage 1 compared to stage 2. The Housing Management Property service paid out the highest total compensation, with £53,408 across 221 cases at stage 1 and £41,485 across 76 cases at stage 2.

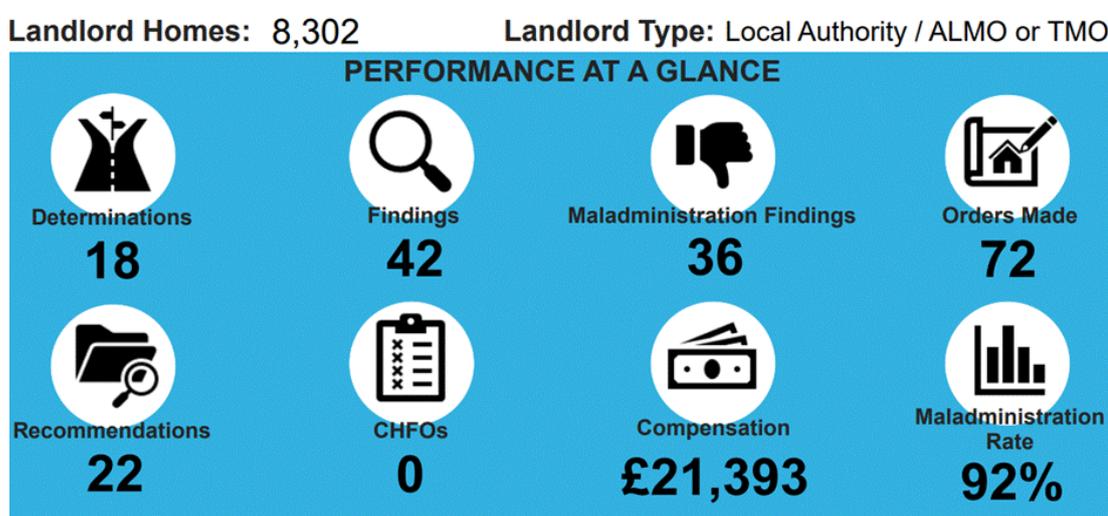
3.0.39 The Council paid a total of £109,787, in compensation in the year 2024/2025, comprising a total of 353 cases. At stage 1, compensation was awarded in 260 cases with a total of £60,897 compensation given overall. Stage 2 involved 93 cases, where £48,890 was awarded in compensation. The amount of compensation and cases that have been awarded compensation has increased compared to 2023/2024 which shows that we are willing to compensate and remedy complaints at an early stage and thus preventing further compensation at stage 2. In 2023/2024, £41,865 was paid at stage 1 which is an increase of almost £20k compared to this year. However, the amount of compensation at stage 2 has decreased by approximately £5k compared to this year.

3.0.40 The main reason recorded for awarding compensation, was due to delay or failure to provide service. This accounted for 217 cases at stage 1 and 81 cases at stage 2. This is 84% of the cases where compensation was awarded across stage 1 and stage 2. The other three main reasons for compensation being paid were for time and trouble which was the reason compensation was given in 23 cases across stage 1 and 2, distress was the reason given for awarding compensation in 16 cases and costs that were incurred by customer was the reason compensation was paid in 11 cases. Another reason for awarding compensation included incorrect actions. When awarding compensation, we credit a resident's rent account if they are in arrears, make direct payments to their bank or, if the amount awarded is under £500, compensation is awarded as a postal voucher to be claimed at any post office.

3.0.41 Compensation awarded by the Council is benchmarked against the Housing Ombudsman’s remedies guidance.

Housing Ombudsman Decisions in 2023/2024

3.0.42 The Housing Ombudsman has not yet provided its annual report for 2024/2025 and therefore we are unable to report on cases that have been referred to it for this financial year. The Housing Ombudsman has however asked that the comments from their 2023/2024 report are included in the Council’s annual report for 2024/2025. The table below has therefore been extracted from the Housing Ombudsman’s 2023/2024 report on the Housing Management Service’s performance. A copy of the Housing Ombudsman’s performance report for Brent has been provided in Appendix 1.



3.0.43 The Housing Ombudsman decided eighteen Housing Management Service complaints in 2023/2024, with forty-two findings and thirty-six maladministration findings arising from these decisions. These resulted in seventy-two orders and twenty-two recommendations. There were no complaint handling failure orders (CHFOs) and no severe maladministration findings issued, both of which are positive outcomes.

3.0.44 A total of £21,393 compensation was recorded as having been ordered by the Housing Ombudsman during 2023/2024. Only £13,503 of this was additional compensation awarded by the Housing Ombudsman further to their investigations and decisions. £7,890 of the total compensation included in the total Housing Ombudsman figure of £21,393 had already been offered to complainants within the Council’s complaints procedure.

3.0.45 The maladministration findings and orders are much higher than the previous year 2022/2023. This is mainly due to the number of determinations made compared to the previous year. In 2022/2023, the Housing Ombudsman made 8 determinations but in 2023/2024 there were more than double determinations made with 18 cases determined. In terms of the recommendations and orders, many of these had already been agreed during the Council’s own complaints

process and the Ombudsman had asked the Council to complete these if we hadn't done so already.

3.0.46 The maladministration rate has however increased by 19% compared to the previous year and therefore more work needs to be done to improve this. This seems to be an issue across local authorities as Brent performed similarly when compared to similar landlords by size and type.

3.0.47 The table below provides a breakdown of the findings by category for 2023/2024.

Complaint Decision	Severe Maladministration	Maladministration	Service failure	Mediation	Redress	No Maladministration	Outside Jurisdiction	Withdrawn	Total
Property Condition	0	15	2	0	1	0	2	0	20
Complaints Handling	0	5	5	0	0	0	0	0	10
Anti-social behaviour	0	2	1	0	1	0	0	0	4
Estate Management	0	3	0	0	0	0	0	0	3
Reimbursement and Payments	0	0	2	0	0	0	0	0	2
Health and Safety (inc. building safety)	0	1	0	0	0	0	0	0	1
Moving to a Property	0	0	0	0	0	0	1	0	1
Occupancy Rights	0	0	0	0	0	1	0	0	1
TOTAL	0	26	10	0	2	1	1	0	42

3.0.48 The Council complied with all 68 of the Housing Ombudsman's orders due to be closed in 2023/2024, achieving a 100% compliance rate.

3.0.49 The Council use the learning from complaints to inform decisions on areas of improvement within the Housing Management Service. The Council also carry out an annual self-assessment against the Housing Ombudsman's Complaint Handling Code to ensure compliance with the Code. A copy of the self-assessment has been provided in Appendix 2.

3.0.50 The Housing Ombudsman has released a series of reports in which they have put the spotlight on issues identified through complaints that they have investigated and resolved. These have consisted of the following:

- Damp and Mould spotlight report – this report contained a number of recommendations for landlords. The Council therefore self-assessed against these recommendations and provided a copy of the results in the annual report for 2022/2023.
- Knowledge and Information Management spotlight report - the Council have also undertaken a self-assessment against the Housing Ombudsman spotlight report on Knowledge and Information Management, and this assessment has been included in Appendix 3.
- Attitudes, Respect and Rights spotlight report – the Council self-assessed against this report last year and the results have been included in Appendix 4.

Benchmarking Data

3.0.51 Due to the short timescale set by the Housing Ombudsman for submitting the annual report, it was not possible to benchmark Brent's performance against other councils' annual reports. However, the Housing Ombudsman's 2023/2024 Annual Complaints Review provides comparative data for similar landlords.

3.0.52 According to the report, the average maladministration rate for London councils was 77%, while Brent's rate stood at 92%, indicating a need for improvement. However, when compared with landlords of similar size and type, Brent's performance was broadly in line, suggesting that many landlords are facing similar challenges in reducing maladministration findings.

3.0.53 Notably, Brent recorded no severe maladministration findings in 2023/2024, compared to a London average of 9% for local authorities. In addition, the Council did not receive any Complaint Handling Failure Orders (CHFOs) during the same period. These outcomes are positive indicators that, despite the higher maladministration rate, there were no serious failings that warranted severe findings or formal intervention.

Customer Feedback and Engagement

3.0.54 The Transparency, Influence and Accountability Standard set out by the Regulator of Social Housing requires all registered providers of social housing to collect and report annually on their performance using Tenant Satisfaction Measures. These are a set of defined measures that provide residents with more transparency regarding their landlord's performance. Through this, we can engage with tenants and glean further information around their housing concerns and satisfaction levels. To note, leaseholders are not part of the sample for these measures.

3.0.55 Complaints are all about listening to and acting on feedback. The proportion of tenant respondents who reported making a complaint in the last 12 months and who are recorded as satisfied with their landlord's approach to complaints handling is 22.2%. This is a slight increase on the previous year, which was at 17.4% and continues to illustrate that this is an area needing significant, evidence-led improvement. Another useful measure is the proportion of tenant respondents who are satisfied that their landlord listens to views and acts upon them. This year we achieved 39.2% satisfaction, compared to last year at 35.2%, another very slight increase. We will continue to engage with the wider resident base to understand what drives their perceptions of our service and what we can do to improve.

3.0.56 One way we are doing that is by creating a resident complaints group, to co-design the improvements highlighted by our complaints handling review. The review was driven by resident insight including Tenant Satisfaction Measure data, wider performance data, a complaint handling survey, benchmarking data, and a scrutiny exercise on the quality of responses. We are confident that by bringing residents together consistently to drive change and hold us to account that we will make effective, sustainable changes to how we deliver complaints.

3.0.57 Tenants were also asked how satisfied or dissatisfied they were with the overall repairs service from the landlord over the last 12 months and the proportion of tenants who reported that they were satisfied with the repairs service was 51.3%. This is a decrease of 3.8% from last year and continues to demonstrate how important it is that we use complaint insights to make targeted service improvements to better the resident experience.

Learning from Complaints and Service Improvements

3.0.58 Feedback from residents offers important insights into what we do well and what can be improved.

3.0.59 Learning from the lived experiences of residents can help identify where services, policies and procedures can be improved, and this helps to ensure that senior managers are informed of issues that matter to residents. This also helps to improve communication and strengthen relationships.

3.0.60 As a result of complaints received by Brent Council, many service improvements have been implemented. Some of the service improvements that have been implemented by the Housing Management Service as a result of complaints include:

- a) Property Services and Pest Control putting in place a more robust communication process to facilitate a coordinated approach in tackling issues of infestation, not least those of a historic nature.
- b) Plain English training has been made mandatory to improve accessibility of our communications with residents across our processes

- c) We have provided training for housing officers to better manage noise nuisance reports
- d) We have updated our adaptations process to improve resident experience.
- e) We have updated the CRM database with PFI properties (Hyde properties where we are the landlords) so that customer services could better triage calls and cases as previously tenants would be advised to go to Hyde even if we were their landlord.
- f) To develop a more robust written procedure for dealing with decants as well as for cases where tenants have declined the initial offer or offers of decant accommodation made to them.
- g) The Housing Management Service to carry out a review and implement a written policy on the use of dehumidifiers
- h) Review process for highlighting health and safety issues identified by surveyors to senior management
- i) Review of the training provided to surveyors
- j) Housing and Neighbourhoods service to review the wording of future anti-social behaviour letters to ensure they are proportionate to the circumstances.

3.0.61 We have implemented a new case review tool to help identify and monitor learning from complaints. Once this is embedded across the service, we will confidently be able to report on the progress of service improvements which are being led by the relevant service areas.

3.0.62 In October 2024, we launched a full review into our complaints handling. The review aims to create a holistic housing management complaints service which advocates for residents, puts things right, helps to rebuild trust, and that learns from its failings and improves to prevent failings happening again. The actions for improvement span from system improvements, internal guidance, training and campaigns, governance and performance monitoring – and makes crucial changes to the way the service is delivered to remove points of failure. This review is not about finding quick fixes or seeking an unjustified reduction in complaints, we want to set up an accessible and effective complaints process and a positive complaint culture embed across our services. Once we have full assurance that our complaint handling is robust, we can then focus on delivering measurable service improvements taken from our complaints learning.

3.0.63 Findings from the review, and learning from this years' complaint data, will be compiled in a Housing Management Complaint Handling Review report, which

will be taken through the governance structures following the Corporate Complaints Annual Report.

3.0.64 Following the Council's annual Complaint Handling Code compliance submission on 28 June 2024, the Housing Ombudsman has reviewed the Council's complaints policy. Their review focussed on ensuring landlords have met the requirements of the Code based on what residents can reasonably expect to be included in a policy document.

3.0.65 Their review identified twelve recommendations for the Council to consider. The Council has accepted all 12 recommendations and has updated its complaints policy to reflect the changes. A copy of the updated policy can be found in Appendix 5.

4.0 Stakeholder and ward member consultation and engagement

4.1 This report will be discussed at Cabinet and the relevant scrutiny committees.

5.0 Financial Considerations

5.1 The details provided on compensation payments in sections 3.0.38 - 3.0.40 and throughout this report reflect the monetary impact of not getting things right the first time as an organisation and the need to improve the customer experience thus minimising the financial penalties incurred by the Council.

5.2 The total compensation offered for Housing Management complaints during the Council's own complaint procedures in 2024/2025 was £109,787 (353 cases), which is an increase of 14% compared to the previous year. The costs implications and budgetary impacts to the Council are being continuously monitored.

6.0 Legal Considerations

6.1 Complaints concerning Housing Management fall under the Housing Ombudsman. The Ombudsman is the final stage in the complaints process, where an individual has complained to the Council and remains dissatisfied with the outcome.

6.2 The Complaint Handling Code became statutory on 1 April 2024, meaning that the Council is obliged by law to follow the requirements set out in the Code. The Social Housing (Regulation) Act 2023 places a duty on the Housing Ombudsman to monitor compliance with the statutory Complaint Handling Code. The Council's Complaints Policy was updated to take account of these changes.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

7.1 Under Section 149 of the Equality Act 2010, the Council has a duty when exercising their functions to have 'due regard' to the need:

- (a) to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited under the Act;
- (b) advance equality of opportunity; and
- (c) foster good relations between those who share a “protected characteristic” and those who do not.

7.2 This is the Public Sector Equality Duty (PSED). The ‘protected characteristics’ are: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, sex, and sexual orientation.

7.3 Although there have been no equality implications identified as a result of this report, the Council is improving the way in which equalities data is captured and analysed so it can be used to identify issues that may disproportionately affect different equality groups.

8.0 Climate Change and Environmental Considerations

8.1 Not applicable

9.0 Human Resources/Property Considerations (if appropriate)

9.1 Not applicable

10.0 Communication Considerations

10.1 The Housing Ombudsman issues spotlight reports to address thematic issues and publishes a monthly report on cases of severe maladministration by landlords. Although the Council has not been featured in any of these reports, it is imperative that we learn from these reports to avoid severe maladministration decisions in the future.

10.2 The Council continues to advertise its complaints policy on the Council’s website and in correspondence with residents. A copy of the Council’s self-assessment against the Housing Ombudsman’s complaint handling Code is also available on the Council’s website along with a copy of this report once it has been through the relevant governance procedures. Comments from Cabinet in relation to the report will be included.

Report sign off:

Minesh Patel

Corporate Director of Finance and Resources

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Housing
Ombudsman Service

**LANDLORD
PERFORMANCE
REPORT**

2023/2024

London Borough of Brent

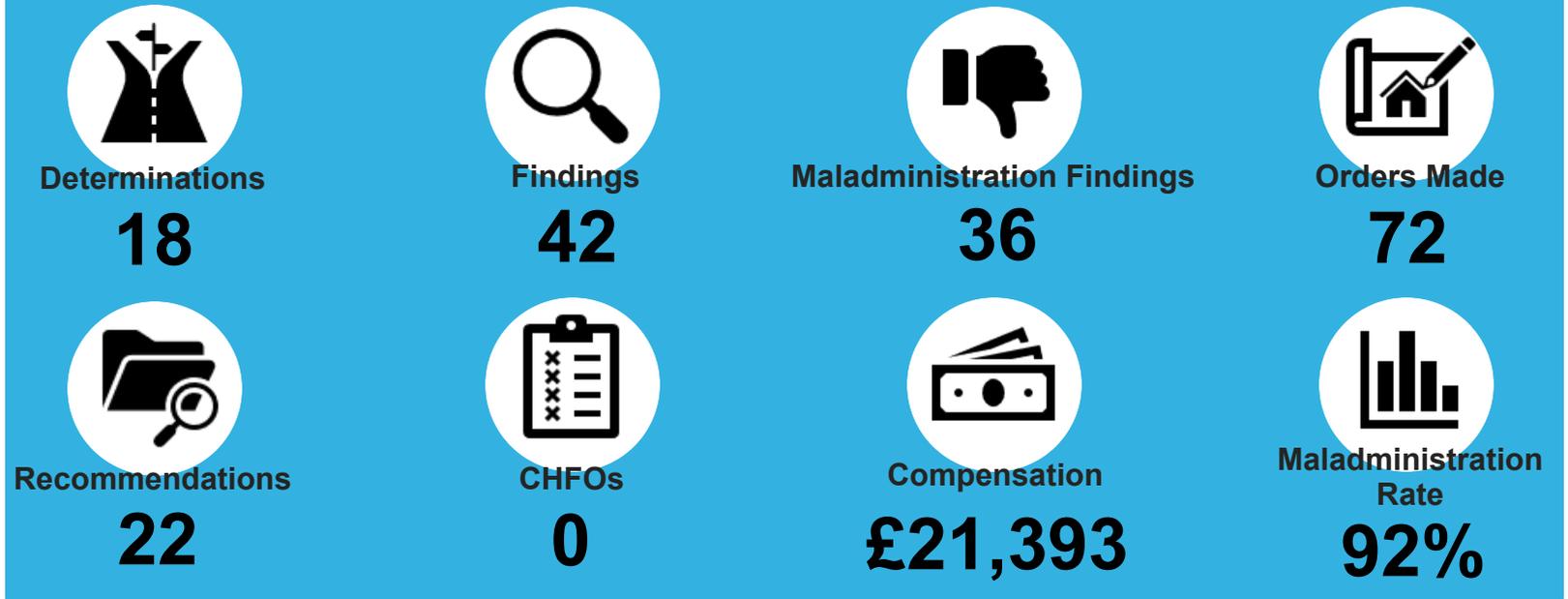
London Borough of Brent

Landlord: London Borough of Brent

Landlord Homes: 8,302

Landlord Type: Local Authority / ALMO or TMO

PERFORMANCE AT A GLANCE



PERFORMANCE 2022-2023



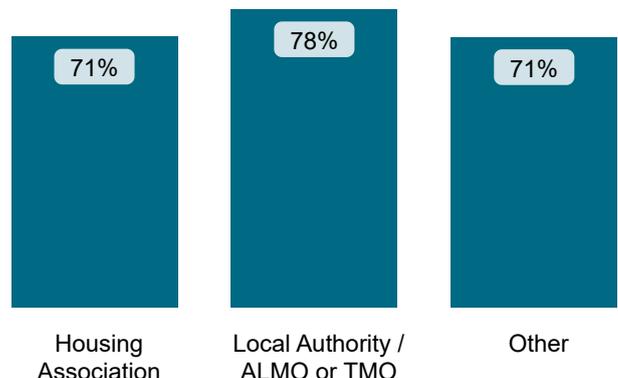
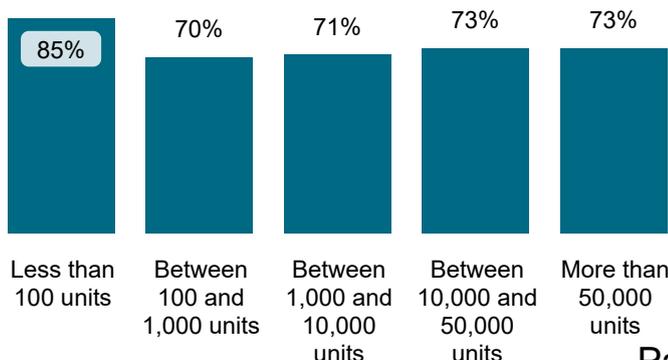
Maladministration Rate Comparison | Cases determined between April 2023 - March 2024

NATIONAL MALADMINISTRATION RATE: 73%

The landlord performed *similarly* when compared to similar landlords by size and type.

National Mal Rate by Landlord Size: [Table 1.1](#)

by Landlord Type: [Table 1.2](#)



Findings Comparison | Cases determined between April 2023 - March 2024

National Performance by Landlord Size: Table 2.1

Outcome	Less than 100 units	Between 100 and 1,000 units	Between 1,000 and 10,000 units	Between 10,000 and 50,000 units	More than 50,000 units	Total
Severe Maladministration	14%	6%	4%	8%	7%	7%
Maladministration	35%	37%	41%	42%	43%	42%
Service failure	18%	19%	20%	18%	19%	19%
Mediation	0%	0%	1%	1%	1%	1%
Redress	0%	5%	7%	8%	12%	9%
No maladministration	12%	21%	20%	15%	12%	15%
Outside Jurisdiction	22%	11%	8%	7%	5%	7%
Withdrawn	0%	0%	0%	0%	0%	0%

London Borough of Brent	
Outcome	% Findings
Severe Maladministration	0%
Maladministration	62%
Service failure	24%
Mediation	0%
Redress	5%
No maladministration	2%
Outside Jurisdiction	7%
Withdrawn	0%

National Performance by Landlord Type: Table 2.2

Outcome	Housing Association	Local Authority / ALMO or TMO	Other	Total
Severe Maladministration	6%	9%	6%	7%
Maladministration	41%	45%	36%	42%
Service failure	19%	18%	21%	19%
Mediation	1%	1%	0%	1%
Redress	12%	4%	5%	9%
No maladministration	15%	15%	21%	15%
Outside Jurisdiction	6%	9%	11%	7%
Withdrawn	0%	0%	0%	0%

Outcome	% Findings
Severe Maladministration	0%
Maladministration	62%
Service failure	24%
Mediation	0%
Redress	5%
No maladministration	2%
Outside Jurisdiction	7%
Withdrawn	0%

Landlord Findings by Category | Cases determined between April 2023 - March 2024

Table 2.3

Category	Severe Maladministration	Maladministration	Service failure	Mediation	Redress	No maladministration	Outside Jurisdiction	Withdrawn	Total
Property Condition	0	15	2	0	1	0	2	0	20
Complaints Handling	0	5	5	0	0	0	0	0	10
Anti-Social Behaviour	0	2	1	0	1	0	0	0	4
Estate Management	0	3	0	0	0	0	0	0	3
Reimbursement and Payments	0	0	2	0	0	0	0	0	2
Health and Safety (inc. building safety)	0	1	0	0	0	0	0	0	1
Moving to a Property	0	0	0	0	0	0	1	0	1
Occupancy Rights	0	0	0	0	0	1	0	0	1
Total	0	26	10	0	2	1	3	0	42

Findings by Category Comparison | Cases determined between April 2023 - March 2024

Top Categories for London Borough of Brent

Table 3.1

Category	# Landlord Findings	% Landlord Maladministration	% National Maladministration
Property Condition	18	94%	73%
Complaints Handling	10	100%	84%
Anti-Social Behaviour	4	75%	68%

National Maladministration Rate by Landlord Size: Table 3.2

Category	Less than 100 units	Between 100 and 1,000 units	Between 1,000 and 10,000 units	Between 10,000 and 50,000 units	More than 50,000 units	% Landlord Maladministration
Anti-Social Behaviour	71%	61%	60%	67%	75%	75%
Complaints Handling	100%	87%	87%	86%	81%	100%
Property Condition	75%	63%	72%	74%	74%	94%

National Maladministration Rate by Landlord Type: Table 3.3

Category	Housing Association	Local Authority / ALMO or TMO	Other	% Landlord Maladministration
Anti-Social Behaviour	68%	69%	67%	75%
Complaints Handling	81%	91%	91%	100%
Property Condition	72%	77%	59%	94%

Findings by Sub-Category | Cases Determined between April 2023 - March 2024 Table 3.4

Highlighted Service Delivery Sub-Categories only:

Sub-Category	Severe Maladministration	Maladministration	Service failure	Mediation	Redress	No maladministration	Outside Jurisdiction	Withdrawn	Total
Responsive repairs – leaks / damp / mould	0	8	0	0	1	0	0	0	9
Responsive repairs - general	0	5	1	0	0	0	0	0	6
Noise	0	1	0	0	1	0	0	0	2
Asbestos	0	1	0	0	0	0	0	0	1
Pest control (within property)	0	1	0	0	0	0	0	0	1
Total	0	16	1	0	2	0	0	0	19

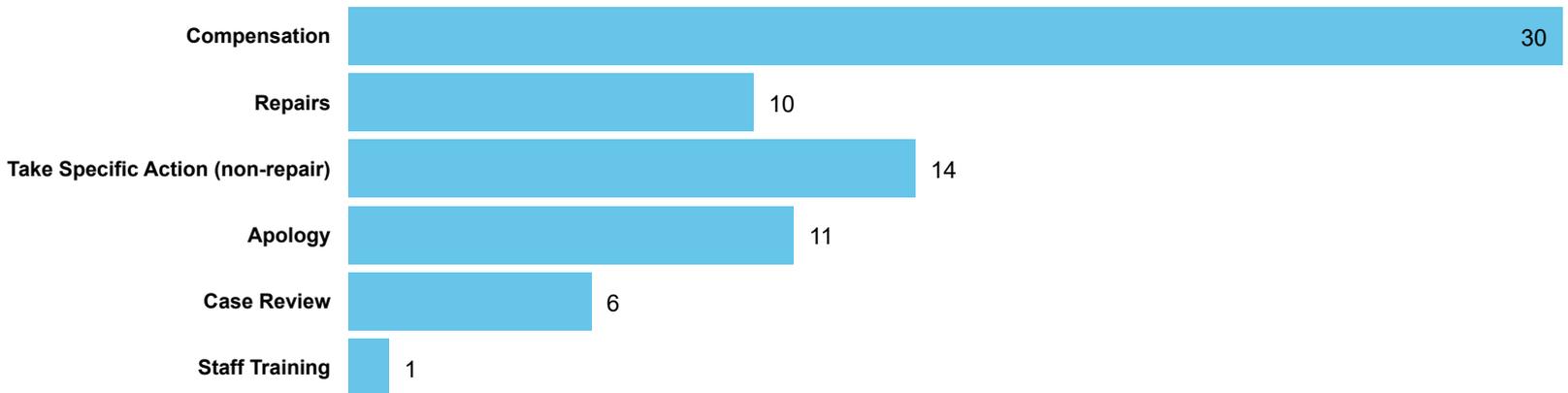
Top Sub-Categories | Cases determined between April 2023 - March 2024

Table 3.5



Orders Made by Type | Orders on cases determined between April 2023 - March 2024

Table 4.1



Order Compliance | Order target dates between April 2023 - March 2024

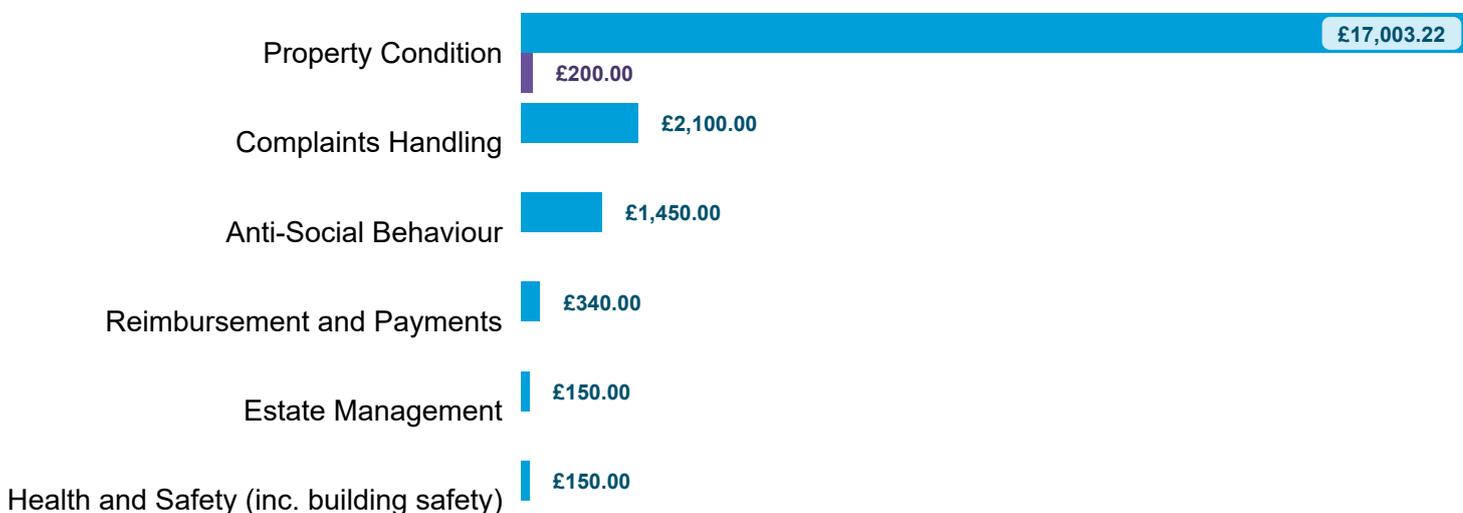
Table 4.2

Order Complete?	Within 3 Months	
	Count	%
Complied	68	100%
Total	68	100%

Compensation Ordered | Cases Determined between April 2023 - March 2024

Table 5.1

● Ordered ● Recommended



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Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Complaints Policy (Under point 3.1)	The definition in the Complaints Policy reads: "A complaint is defined as an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual or several individuals." The reference to residents has been removed as anyone can make a complaint, not just residents.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Complaints Policy (Under point 3.1 & 3.2)	Residents do not have to use the word complaint for it to be treated as one and a complaint submitted via a third party or representative is handled in line with the Council's complaints policy. As per the policy and definition above, a complaint could be made about the following: <ul style="list-style-type: none"> • Delay in taking action without good reason • Failure to provide a service • Mistakes in the way a decision was taken • Not following the law or the Council's own rules • Broken promises • Giving incorrect or misleading

				<p>information</p> <ul style="list-style-type: none"> • Bias or discrimination • Rude, unhelpful or inappropriate behaviour by staff • Poor communication <p>Complaint training provided to staff also reiterates that residents do not have to use the word 'complaint' for it to be treated as such.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Workshops, training and guidance to improve our tolerance of dissatisfaction, and how we are identifying and recording potential complaints. • An internal campaign, using case studies, to improve identification of dissatisfaction due to potential service failings and strengthen root cause analysis.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not	Yes	<p><u>Complaints Policy</u></p> <p>(Under point 3.1)</p>	The Council recognises the difference between a complaint and a service request. It mentions in its Complaints Policy, "Some issues do not fall within the category of a complaint and are more appropriately dealt with as a service request. This can include instances where a customer is 'complaining' about a

	complaints, but must be recorded, monitored and reviewed regularly.			<p>problem that the Council has not created, such as neighbour noise nuisance. The same can be true for a 'complaint' received to report a repair request. These are requests to the Council for appropriate action to be taken."</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Workshops, training and guidance to improve our triaging of dissatisfaction and recording of potential complaints. • An internal campaign, using case studies, to stop the reliance on service requests. • Monitoring of service requests will be added to all casework conversations and used to improve our customer access. First analysis to be published in our Housing Management Complaints Performance Review later this year.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	<p>Complaints Policy</p> <p>(Under point 3.1)</p>	<p>The Council will log a complaint where the complainant is not happy with the way in which their service request/s has/have been handled. The Council will continue to take action on the requests raised whilst the complaint is being investigated.</p>

1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Awareness of complaints process in tenant satisfaction surveys	The Council will outline where appropriate, how a resident can raise a complaint should they express dissatisfaction through a survey or any other feedback mechanism. We will include in our tenant satisfaction surveys information on how residents can pursue any dissatisfaction with the service they have received through the complaints process.
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Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Complaints Policy (Under point 8.1)	<p>The Council accepts all complaints unless there is a valid reason not to, including where it falls within Appendix 1 of the Complaints Policy.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Reinforce in training and guidance • To be added as an assessment point on the complaints audit programme

2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	<p>Complaints Policy (Under point 3.4)</p>	<p>The Complaints Policy clearly outlines what can and cannot be considered under the Council's complaints process. The circumstances are fair and reasonable and in line with Housing Ombudsman guidance.</p>
2.3	<p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	Yes	<p>Complaints Policy (Under point 3.4)</p>	<p>The Council accepts complaints that are made within 12 months of the issue occurring or the complainant becoming aware of the issue unless they are excluded on other grounds. There may be occasions where the Council will apply discretion to investigate complaints which exceed the 12 months period. The Complaints Policy states: "The Council will accept complaints made within 12 months of the issue occurring or the individual being made aware of the issue, unless</p>

				<p>excluded on other grounds such as the ones outlined in section 8.1 of this policy. The Council will not normally accept a complaint where the customer has delayed raising the complaint with the Council by more than 12 months.</p> <p>The Council recommends that contact is made as soon as possible, to ensure access to data is readily available. Complaints exceeding 12 months will be considered on a case by case basis.”</p>
2.4	<p>If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.</p>	Yes	<p>Complaints Policy (Under point 3.4)</p>	<p>If a complaint is not to be considered, the resident will still receive a response detailing reasons why the complaint cannot be considered and the response will include escalation rights.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Reinforce in training and guidance • To be added as an assessment point on the complaints audit programme
2.5	<p>Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.</p>	Yes	<p>Complaints Policy (Under point 3.4)</p>	<p>The Council will consider complaints exceeding 12 months on a case by case basis. This is noted in the Complaints Policy. We also have a Vexatious Complaints Policy which we follow but this again will consider individual circumstances of the case.</p>

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Complaints Policy (Under point 3.3)	<p>Complaints can be raised via email, in person, by telephone or using the online form or portal. They can also be submitted via a Councillor or directly to officers if the resident asks for an issue to be processed through the complaints process. We accept all forms of communication including verbal, written or online.</p> <p>The Council is committed to ensuring that all residents can access its services and are not disadvantaged in any way. Below are some of the adjustments that can be offered which are outlined in the Council's Complaints Policy:</p> <ul style="list-style-type: none"> • use of email or telephone in preference to hard copy letters • use of plain English or Easy Read service on our website • communication through a representative or intermediary • rest or comfort breaks in meetings. • provision of information in appropriate alternative formats (eg. large print, Braille, coloured paper etc.) • provision of auxiliary aids

				<p>The Equality Act 2010 introduced the Public Sector Equality Duty (PSED) which the Council considers when carrying out day-to-day functions, crafting policies and delivering services. All staff undertake equality and diversity training, which is part of the Council's essential training programme. The Council's Equalities Strategy Lead officer is currently undertaking an overarching piece of work which is reviewing accessibility to the Council – not just in terms of physical access but also looking at how residents and customers are able to interact with us and access services/support based on, for example, our use of language in corporate materials. Our Equalities Strategy, due for circulation next year alongside our Borough Plan, will set out a detailed approach on how we aim to remove inequalities and build a better, stronger, more inclusive Brent.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none">• Plans to consult and co-design improvements with the resident complaints group• Complaints campaign during resident summer roadshows 'how to make a
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				<p>complaint'</p> <ul style="list-style-type: none"> • Improved website content • Improving internal guidance on routes to complaint and support that may be required by residents
3.2	<p>Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.</p>	Yes	<p>Complaints are accepted in person, on the phone, via email and social media channels</p>	<p>Officers within the Council are made aware of the complaints process. Services know how to log their own complaints and there is a corporate team within the Council to offer assistance and provide training. The Housing Department have a dedicated team who log all housing complaints.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • New Housing Complaints Guidance • Housing Services Complaint Handlers Teams area • Potential development of a staff form to support residents to make their complaint
3.3	<p>High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.</p>	Yes	<p>We provide this narrative in our Annual Complaints Report</p>	<p>The Council welcomes complaints as a way of learning and agrees that the number of complaints is not indicative of a high number of issues within the borough, it can demonstrate awareness of the complaints process.</p> <p>Recommendations following Complaint Learning Review:</p>

				<ul style="list-style-type: none"> • Directly addressing this message as part of the project which is championing different metric e.g. reducing number of escalated and upheld complaints, as opposed to lowering volumes • Realigning data and performance information with resident outcomes • Extensive ongoing data validation and system changes to ensure complaint volumes are accurate • Complaints campaign during resident summer roadshows ‘how to make a complaint’ • Development of a complaints comms plan
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord’s website.	Yes	<p>Complaints Policy</p> <p>(Under point 7.1)</p> <p>How to make a complaint Brent Council</p>	Our complaint policy is available on the Council’s website in a clear and accessible format for all residents. The policy is available with voiceover, and can be translated from the toolbar in a number of languages, viewed using screen mask or with enlarged text. The policy explains the complaint stages, what will happen at each stage, and timeframes for a response. The policy also explains “The Council will consider and try to accommodate as far as possible any requests to provide the policy and any other relevant documents in an accessible format.”

				<p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • housing specific complaint webpage to make it clearer for our residents, with simplified information and tested for reading age • Potential to explore other mechanisms e.g. infographics, video etc, to be co-designed with the resident complaints group
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	<p><u>Complaints Policy</u></p> <p>(Under point 7)</p>	<p>The Complaints Policy explains how we publicise details of the policy, contains information on the Housing Ombudsman and the Code. A copy of the Council's self-assessment of the code and the Code itself are all publicised on the Council's complaints webpages. Our final review complaint responses also signpost residents to the Housing Ombudsman should they remain dissatisfied. The Housing Management Service will include in regular correspondence (leaflets, posters, newsletters) details of the Housing Ombudsman and Complaints Handling Code as well as the Complaints Policy.</p> <p>The Housing Management Service will also be providing information on notice boards within Council blocks, at Resident Associations and will insert an advert banner on all their emails to residents for</p>

				short periods across the year promoting the complaints process.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Complaints Policy (Under point 3.2)	The Council accept complaints from advocates, a representative or family member as long as consent from the complainant has been provided. Where reasonable they are also able to attend any meetings.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Complaints Policy (Under point 3.7)	<p>Contact details for the Housing Ombudsman are available on the Council's webpages and a direct link to the Ombudsman website is also provided. The Complaints Policy details a complainant's right to access the Housing Ombudsman Service throughout their complaint. Our final review complaint responses also signpost residents to the Housing Ombudsman should they remain dissatisfied.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • The resident newsletter introduced in 2025 to include regular messaging around complaints and the Housing Ombudsman • Complaints campaign 'how to make a complaint' • Review of tenancy sign up information is ongoing and checking complaints

				information will feature as part of this review
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Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	We have a Corporate Complaints team who report to the governing body.	<p>The Housing Management Service have a dedicated support team and a Complaints Officer managing complaints. In addition, our principal repairs contractor has a dedicated complaints officer and we have weekly complaints meetings to address lessons learnt from complaints and work on next steps. The Council also have a corporate complaints team that monitor and track all complaints received by the Council. The corporate complaints team compile complaint reports to Cabinet on a yearly basis.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Creation of a new Teams are for all Housing Services Complaint Handlers' i.e. anyone who is involved in our residents' complaints • Ongoing review of how complaints are monitored and coordinated across

				Housing Services and beyond to the other teams and contractors who provide landlord services
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	The Corporate Complaints team interact with staff at all levels and have the authority and autonomy to resolve complaints. The team also hold a compensation budget for stage 2 complaints	All complaint handlers receive training on dealing with complaints and complainants. They have autonomy to resolve complaints and approve lower level compensation payments. There is also direct access to senior staff to facilitate quick resolution and approve higher level payments or complex remedies.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Complaint Handling training is provided to officers	<p>All relevant staff are suitably trained to handle complaints. Services are reasonable resourced to handle complaints and we have a corporate complaints team which is a core service that delivers refresher training sessions for staff across the Council.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • New Ombudsman Review tool to be implemented- review learning from positive feedback received • Further mandatory training for all complaint handlers and monitoring of attendance to be introduced • Creation of a new Teams group for all Housing Services Complaint Handlers' i.e. anyone who is involved in our residents' complaints to keep reaffirming

				key messages
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Complaints Policy	<p>The Council has one single Policy for dealing with complaints which details all the necessary information in regards to the management of complaints. All complainants are treated fairly and in line with the policy. They are not treated adversely if they complain.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Introduction of new Housing Complaints guidance document to clarify specific information for staff and residents
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Complaints Policy (Under point 3.5)	The Council has one single complaints process which has two stages. The policy outlines how complaints will be dealt with.
5.3	A process with more than two stages is not acceptable under any	Yes	Complaints Policy	The Council operates a two stage complaint process.

	circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.			
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	We have agreements in place with contractors in relation to complaints handling	<p>We ask any third parties to whom we have delegated complaint handling to respond at stage 1 of the process and if the complainant remains dissatisfied they have a right to escalate to stage 2 in which the Council will investigate and respond.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Full mapping exercise to clarify where responsibilities sit with third parties and strengthen our monitoring of this
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	This is included in our third party agreements	<p>We provide third parties with the process which they must follow and ask that they handle complaints in line with the Code. We also hold regular meetings with our contractors to discuss volumes and complaints handling.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Full mapping exercise to clarify where responsibilities sit with third parties and strengthen our monitoring of this
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2,	Yes	Complaints Policy	Complaint acknowledgements include a brief summary of the area of complaint and

	landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.		(Under point 3.5) Complaint acknowledgements have been updated to reflect this	<p>officers dealing with the complaint will promptly contact the complainant to request clarification if any aspect of their complaint is unclear or should the outcome the resident is seeking also not be clear. This has been explained in the policy “complaints are logged, defined and acknowledged within 5 working days of the complaint being received. The acknowledgement will include our understanding of the complaint, the outcomes that are being sought, which aspects the Council is or isn’t responsible for and if there are any aspects that are unclear clarification will be sought.”</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Reinforced through training and guidance • To be added as an assessment point on the complaints audit programme • Closer monitoring on those that receive a second auto acknowledgement to be implemented to prevent non-compliance
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not,	Yes	Complaints Policy (Under point 3.5)	Complaint acknowledgements make clear what aspects of the complaint are to be investigated and confirm any aspects that fall outside of the policy or aspects for which we are not responsible.

	responsible for and clarify any areas where this is not clear.		Complaint acknowledgements have been updated to reflect this	<p>This has been explained in the policy “complaints are logged, defined and acknowledged within 5 working days of the complaint being received. The acknowledgement will include our understanding of the complaint, the outcomes that are being sought, which aspects the Council is or isn’t responsible for and if there are any aspects that are unclear clarification will be sought.”</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Reinforced through training and guidance • To be added as an assessment point on the complaints audit programme
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> deal with complaints on their merits, act independently, and have an open mind; give the resident a fair chance to set out their position; take measures to address any actual or perceived conflict of interest; and consider all relevant information and evidence carefully. 	Yes	<p>Complaints Policy</p> <p>(Under point 3.5)</p>	<p>All complaint handlers receive relevant training on complaints handling to conform to the points listed. There is also guidance on the Council’s intranet pages to reinforce these points to officers. Annual Data Protection training is also a mandatory training requirement for all officers. If a complaint concerns a particular individual it is assigned to their line manager. The Corporate Complaints team investigate stage 2 complaints independently of the service about which a complaint has been made.</p>

				<p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Reinforced through training and guidance • To be added as an assessment point on the complaints audit programme
5.9	<p>Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.</p>	Yes	<p>Complaints Policy</p> <p>(Under point 3.6)</p>	<p>Where reasonable, officers will keep residents updated with the progress of their investigation. Complainants are informed in advance on the rare occasions when there will be a delay in responding and will agree on regular updates until a full response is provided.</p> <p>The policy states “On occasions where additional time is required beyond the extended timescales noted above (more than 20 days from stage 1 acknowledgement or more than 40 days of the complaint being acknowledged at stage 2) the investigator will agree with the complainant suitable intervals for being updated on their complaint.”</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Working on system solutions to improve

				<p>the way we control and monitor case extensions to ensure this process is followed</p> <ul style="list-style-type: none"> • To be added as an assessment point on the complaints audit programme
5.10	<p>Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.</p>	Yes	<p>Complaints Policy (Under point 3.2)</p>	<p>The Council makes reasonable adjustments for residents where appropriate. The Complaints Policy provides examples of some of the reasonable adjustments that can be made. Residents can indicate when raising a complaint whether they have any disabilities or require any adjustments. This information is then recorded on their complaint record.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Formalise adjustments when reviewing the complaint customer journey • Enhance data collection and usage as part of wider, longer-term projects on resident data • Share good case studies through training and Teams area
5.11	<p>Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these</p>	Yes	<p>Complaints Policy (Under point 3.5)</p>	<p>The Council does not refuse to escalate a complaint through its complaints procedure unless there is a valid reason. Reasons why a complaint may not be escalated are stipulated in the Council's Complaints</p>

	reasons, and they must comply with the provisions set out in section 2 of this Code.			Policy. A response will be provided to the resident outlining why we will not escalate the complaint.
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	This is all contained within the Council's case management system and can be downloaded	<p>All records of the complaint are logged on the Council's case management system. This includes dates of complaint receipt and responses, relevant correspondence and documentation, and details of any compensation and corrective actions/service improvements and outcomes. Corrective actions and service improvements are separately monitored by the service to ensure actions are carried out. We also record issue types and root causes of complaints.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • System and process requirements to be backed up in Housing Complaints guidance • To be added as an assessment point on the complaints audit programme
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the	Yes	Officers handling complaints have the autonomy to suggest and implement appropriate remedies at any stage of the complaints process	We do our best to resolve a complaint at the first point of contact. We consider the issues and after full consideration will propose a reasonable solution. Any immediate actions will be taken as soon as possible.

	complaints process without the need for escalation.			Recommendations following Complaint Learning Review: <ul style="list-style-type: none"> • Potential to implement a compensation/remedies policy or guidance for housing complaints • To be picked up through training
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Vexatious Complaints Policy 2023	The Council's Vexatious Complaints Policy provides procedures on how to manage unacceptable behaviour from residents and/or their representatives when pursuing a complaint. When a person is restricted we keep all evidence in a folder and a reason for restriction is provided in our restriction letter. We have a review period for restrictions. The Council are working on a Council-wide unreasonable behaviour policy
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	Vexatious Complaints Policy	Restrictions placed following unacceptable complainant behaviour and managed through the Vexatious Complaints Policy consider the Equality Act 2010 and impact on individual complainants. Only necessary restrictions are applied relating to specific issues. We always allow residents in these circumstances to access Council services more generally. We also have review periods for restrictions. The Council are working on a Council-wide unreasonable behaviour policy.

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Complaints Policy (Under point 3.5)	<p>The Council will aim to respond to complaints as early as possible and specifically where there are any risks or vulnerabilities involved and the issue is current/live as well as if the complaint raises something urgent, like an outstanding repair, we will seek to progress that as soon as possible, at the same time as pursuing a complaint investigation. Where the complaint relates to historic issues or is complex these may take longer to investigate.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Ongoing discussions about how records and information is shared between housing systems to enable • Once stronger record keeping is in place then guidance and training will reinforce a more formalised process
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five</u>	Yes	Complaints Policy (Under point 3.5)	<p>The Council logs and acknowledges all stage 1 complaints within 5 working days. This is also stipulated in our Complaints Policy.</p>

	<u>working days of the complaint being received.</u>			<p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • New channels for reporting complaints and triaging straight to housing complaints team are being explored and implemented • Reporting around acknowledgements to be enhanced to allow for stronger case management and assurance that tailored information is sent • To be added as an assessment point on the complaints audit programme
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	<p>Complaints Policy</p> <p>(Under point 3.6)</p>	The Council responds to complaints within 10 working days of the complaint being acknowledged.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	<p>Complaints Policy</p> <p>(Under point 3.6)</p>	<p>Where the Council requires more time to investigate the issues and provide a response, an email is sent to the resident explaining the reason for the extension and providing a new deadline date which does not exceed 10 working days.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • System changes being explored to add more controls to this part of the process and strengthen accurate compliance

				<p>report</p> <ul style="list-style-type: none"> • Reinforced in training and guidance • To be added as an assessment point on the complaints audit programme
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Email acknowledgements have been updated to reflect this.	<p>When we request for an extension of the timescales in our email to the complainant we will include details of the Ombudsman.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Reinforced in training and guidance • To be added as an assessment point on the complaints audit programme
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	<p>Complaints Policy</p> <p>(Under 3.7)</p>	<p>A complaint response is provided once an investigation has been completed and no later than the maximum timescale outlined in the Complaints Policy. Any actions required following the investigation will be logged with a timescale and tracked until completion on the Council's complaints system. This is explained in the policy "Complaints will normally be closed once an investigation has been completed and a response has been provided to the complainant. If there any outstanding actions following a complaint response at any stage, these are logged on to the Council's complaint system with an agreed timescale and tracked to completion. Updates on these outstanding actions will be provided to the complainant."</p>

6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	The Council has a template letter which officers need to follow when responding to complaints to ensure a thorough response is provided	<p>The Council addresses all points raised in the complaint, clearly providing reasons for decisions, and referencing any relevant law/good practice.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Reinforced in training and guidance • To be added as an assessment point on the complaints audit programme
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	<p>Complaints Policy</p> <p>(Under point 3.6)</p>	Where additional complaints are raised during the investigation, these will be incorporated if relevant and if the response has not yet been issued. If the issues require significant time to be looked into and would delay the response, a new complaint will be logged, or new timescale will be agreed with both parties. This is stipulated in the policy "If additional related information or complaints are provided during the course of the investigation, the Council will incorporate them into the stage 1 response if the response has not yet been issued, however we may need to extend the response time to consider the new information. It is therefore important that all supporting information is provided at the time the complaint is lodged. Any new issues will be logged as a new complaint if the stage 1 has already been

				<p>issued, the issues are unrelated, or it would unreasonably delay the response.”</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Reinforced in training and guidance • To be added as an assessment point on the complaints audit programme
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ol style="list-style-type: none"> the complaint stage; the complaint definition; the decision on the complaint; the reasons for any decisions made; the details of any remedy offered to put things right; details of any outstanding actions; and details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	<p>The Council has a template letter which officers need to follow when responding to complaints to ensure all points are covered.</p>	<p>The Council has a template available for officers to use so that all the points (a-g) are addressed within the response.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Reinforced in training and guidance • To be added as an assessment point on the complaints audit programme

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	<p style="text-align: center;">Complaints Policy</p> <p style="text-align: center;">(Under point 3.5)</p> <p>We have a two stage process, and escalation details are provided in all stage 1 responses.</p>	<p>All stage 1 complaints inform complainants that if they remain dissatisfied, they can escalate their complaint to stage 2 and details are provided of how they can do this. This is also explained in the policy at section 3.5 "the complaint can be progressed directly to stage 2, if all or part of the complaint is not resolved to the complainant's satisfaction. Details of how complainants can escalate their complaints to stage 2 will be contained in the stage 1 response."</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Reinforced in training and guidance • To be added as an assessment point on the complaints audit programme
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	All stage 2 complaints are acknowledged, defined and logged within 5 working days as per the Complaints Policy	<p>All stage 2 complaints are defined and acknowledged within 5 working days of receipt. This is explained in the policy.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • To be added as an assessment point on

				the complaints audit programme
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	Officers make reasonable enquiries to determine what points are outstanding.	<p>The Council will make reasonable efforts to understand why complainants remain unhappy, however, if it is not clear we will ask the complainant for clarification so that we can ensure we address all the issues they remain unhappy with and avoid any misunderstanding. The policy explains that “although not a requirement we ask that they clearly state what parts of their complaint have not been addressed satisfactorily and the reasons why so that the investigator can focus the investigation and identify the aspects of the stage 1 that did not sufficiently remedy the complaint and for any outstanding points to be addressed in the stage 2 response.”</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • To be added as an assessment point on the complaints audit programme
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<u>Complaints Policy</u> (Under point 3.5)	All stage 2 responses are investigated by the Corporate Complaints team who are independent of the service area and officer who has responded at stage 1. Corporate directors review and decide stage 2 complaints. If they are unavailable, this is delegated to a director to approve and sign off.

6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Complaints Policy (Under point 3.6)	The Council aims to respond to all stage 2 complaints within 20 working days of acknowledgement, where possible.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Complaints Policy (Under point 3.6)	When considering a complaint escalation that has been received and it is clear that due to complexity or other factors that more time will be required to investigate we will inform the complainant in the acknowledgment or a further email of the new expected timescale which will not exceed an additional 20 working days.
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Complaint acknowledgements have been updated to cover this	We provide details of the Ombudsman when we require an extension of the response timescales. Recommendations following Complaint Learning Review: • To be added as an assessment point on the complaints audit programme
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions	Yes	Complaints Policy (Under point 3.7)	A complaint response is provided once an investigation has been completed and no later than the maximum timescale outlined in the Complaints Policy. Any actions required following the investigation will be logged with a timescale and tracked until

	must still be tracked and actioned promptly with appropriate updates provided to the resident.			completion on the Council's complaints system. This is explained in the policy.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	The Council has a template letter which officers need to follow when responding to complaints to ensure a thorough response is provided	The Council addresses all points raised in the complaint, clearly providing reasons for decisions, and referencing any relevant law/good practice.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	The Council has a template letter which officers need to follow when responding to complaints to ensure all points are covered.	At the completion of a stage 2 investigation, a response is issued which includes the points stated. The response includes a summary of the complaint, a chronology of any relevant events, the decision and reasons for it. It also includes any actions and learning with timescales for implementation and a reasonable remedy which may include compensation.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaints Policy (Under point 6.1)	All relevant officers are consulted before a second stage complaint response is finalised, to ensure that the decision is a corporate one.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes	<p>In complaint responses if we are in the wrong we will apologise, explain what happened and provide information on what actions will be taken to remedy the issue whether that be a change in policy or procedure, sending a reminder to staff, taking specific action or providing a financial remedy. All actions are documented on the Council's complaints system and assigned to an officer to action.</p>	<p>The Council will always try to resolve the issues as soon as possible. If the Council is at fault, it will accept fault, offer an apology, and provide a plan of action to put things right if the issues have not yet been resolved.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Reinforced through training and guidance using best practice e.g. HO apologies guidance • Key message to be enforced as part of cultural change towards a positive complaints culture • To be added as an assessment point on the complaints audit programme
7.2	<p>Any remedy offered must reflect the impact on the resident as a result of any fault identified.</p>	Yes	<p>Complaints Policy</p> <p>(Under point 4.1)</p>	<p>The Council follows the remedies guidance provided by the Housing Ombudsman. All remedies are considered on their own merit and in line with published guidelines.</p>

				<p>The Council will try its best to manage expectations of what remedies can and cannot be delivered.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Potential to implement a compensation/remedies policy or guidance for Housing complaints • To be picked up through training
7.3	<p>The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.</p>	Yes	<p>Remedies are logged on the Complaint system and assigned to an officer with a timescale for completion</p>	<p>Any actions to be taken to remedy fault will be explained and clear timescales will be provided. Corrective actions will be monitored and tracked to completion.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Bringing together all responsibilities in one process end-to-end of the complaints journey • Monitoring of corrective actions as commitments • Remedies and compensation guidance review
7.4	<p>Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.</p>		<p>Complaints Policy</p> <p>(Under point 4.1)</p>	<p>The Council follows the Housing Ombudsman guidance on compensation and considers payments that are required by law, any refunds/reimbursement of</p>

				losses, time and trouble, distress and inconvenience.
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Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ol style="list-style-type: none"> the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; any findings of non-compliance with this Code by the Ombudsman; the service improvements made as a result of the learning from complaints; any annual report about the landlord's performance from the Ombudsman; and 	Yes	<p>Open data link to annual reports: Annual Report Data</p>	<p>The Council produces an annual report which includes our self-assessment of the Code, quantitative and qualitative data on performance and the types of complaints received, any findings of non-compliance with the Code, any annual report about the landlord's performance from the Ombudsman, and any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p> <p>The report is then reviewed through the Council's governance procedures which includes Cabinet and relevant scrutiny committees.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> Housing Services Quality Assurance and Standards Team jointly working on self-assessment against the Code with the corporate complaints team to improve on the detail included,

	f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.			<p>transparency and accountability of the service</p> <ul style="list-style-type: none"> • Improving data analysis to feed into the report – to include qualitative analysis • QA Team to produce a performance report later in the year which triangulates the findings from this self-assessment, with performance and insight, and findings from the review
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	<p>Copy of latest published annual report on relevant website page: Latest Annual Report</p> <p>Cabinet response to report: Cabinet Report and Governing Body's Comments</p>	<p>The annual complaints report is reported to the Council's governing body and to the relevant scrutiny committees. The annual complaints report is also published on the Council's website on the Complaints page. The governing body's response to the report can be found in the Cabinet report minutes under the relevant governance page along with a copy of the report. The report for this year is awaiting to go through the relevant governance procedures before it is published.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Reporting to the newly formed Housing Management Advisory Board • Reporting more consistently to the MRC • Clearer governing body response on the website

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	This is our latest self-assessment and is to be included as an appendix in our annual report 2024/2025	<p>The Council will carry out a self-assessment if there have been significant changes. The outcome of the self-assessment is reported to elected members. It is also published on the Council's website and included in the annual complaints report.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Housing Services Quality Assurance and Standards Team jointly working on self-assessment against the Code to ensure it reflects ongoing changes as the project progresses
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We self-assess against the Code on an annual basis and when asked by the Ombudsman.	Noted. The Council has not been asked to do this.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	We will alert the Ombudsman and resident if we are unable to comply with the Code due to exceptional reasons.	The Council will inform the Ombudsman if due to exceptional circumstances we are unable to comply with the requirements of the Code. We will advise complainants who may be affected and we will publish on our website a timescale of when we will be returning to compliance with the Code.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Learning and improvements are included in the Council's Annual Complaint Report	<p>The Council will always look beyond the circumstances of the complaint and try to learn lessons from complaints and implement any more general service improvements to benefit residents.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Creating an accountable, continuous learning based, positive complaints culture and holistic service is a driving aim for all the solutions listed throughout the self-assessment • Implementation of new case review tools and QA monitoring • Root cause analysis training for complaint handlers
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	We discuss complaints in our departmental management meets and report on performance and quality of responses on a quarterly basis.	The Council uses the learning and feedback from complaints to inform decisions, learning and improvements across the Council. The Council continuously scrutinise complaints data to identify themes and trends so that change can be made to prevent issues occurring.

				<p>We discuss complaints in our departmental management meets and report on performance and quality of responses on a quarterly basis.</p> <p>All findings and actions highlighted in the complaints handling review aim to embed a new way of working and a new culture</p>
9.3	<p>Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.</p>	Yes	<p>Wider learning and improvements are included in the annual report which goes to relevant scrutiny committees. We also discuss complaints during residents' panels</p>	<p>Learning from complaints is included in the Council's annual complaints report which goes to Cabinet and is considered at scrutiny committees. If some of the recommendations include training needs or reminders to staff, senior managers will communicate this. Residents are informed in complaints responses of any service improvements that will be implemented as a result of their complaint.</p> <p>Under the new tenant engagement strategy and model there is a clear commitment to respecting resident feedback and how this is not only implemented in the service but positive change is communicated back to the resident. Examples include: A tenant and leaseholder led review of complaint responses a minimum of once per year; communicating learning from trends in our complaints in tenant targeted</p>

				<p>communications; using complaints as a form of insight when reviewing policies.</p> <p>To effectively embed a culture of respect for resident feedback, the service responsible for engagement will carry out training and briefings with individual teams and a quality management system will be linked to the new strategy to measure impact and identify gaps in practice.</p>
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	The Director of Housing Services is the appointed person	<p>The Director of Housing Services is the senior lead person accountable for complaint handling for Housing Management complaints. The Director is provided with data on stage 1, stage 2 and Ombudsman enquiries and has the autonomy to direct service changes.</p> <p>The Quality Assurance and Standards Team are leading on a full review of complaints handling for Housing and feeding findings into the Director of Housing Services to lead on change.</p>
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member	Yes	The Deputy Leader of the Council is the MRC	MRC has been appointed as the Cabinet Member for Housing who is directly involved in the review and whose role in driving a positive complaints culture will continue to grow as we embed a new way of working. Complaints are reported quarterly to the Council's Management Team (CMT) and annually to Cabinet,

	Responsible for Complaints ('the MRC').			Policy Co-ordination Group (PCG) and the relevant Scrutiny Committee.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	The MRC has access to staff who will provide the relevant information for discussion with the governing body	<p>The Deputy Leader of the Council will receive regular updates on complaint performance data and is copied into all upheld Ombudsman decisions (the anonymised report only). They have a direct line in to the Deputy Director of Democratic and Corporate Governance who oversees the corporate complaints team.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Work with the MRC to embed a new governance framework to create an effective line of sight of complaints
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to 	Yes	The MRC is update quarterly and received the annual complaints report which includes all the data outlined	<p>Information relating to complaints is provided quarterly to CMT which includes: volumes, performance, outcomes, compensation, root causes, and Ombudsman cases.</p> <p>All Ombudsman decisions are circulated to Corporate Directors, Directors, Heads of Service and officers involved with the complaint when the decision is received. The upheld Final Decisions are also circulated to the Chief Executive, the Leader, and Deputy Leader as portfolio holder. A summary of the upheld cases is also included in the Council's annual</p>

	<p>severe maladministration findings; and d. annual complaints performance and service improvement report.</p>			<p>complaints report. The self-assessment the Council undertakes in relation to the Housing Ombudsman Code will be included in the Council’s annual complaints report if there have been any significant changes.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Work with the MRC to embed a new governance framework to create an effective line of sight of complaints
<p>9.8</p>	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	<p>Yes</p>	<p>We share our objectives with staff and contractors that are working on our behalf to ensure there is one goal and we work together to achieve it for the benefit of our residents</p>	<p>The Council works collaboratively with teams across departments to achieve a joined up approach to complaints. Council services collectively take responsibility and identify solutions to make things right.</p> <p>All findings and actions highlighted in the complaints handling review aim to embed a new way of working and a new culture</p>

Spotlight on: Knowledge and Information Management (KIM) – Brent Housing self-assessment – Sep 2023

	Recommendation	Detail	Brent current position	Proposed action
Governance and Culture				
1	Define the oversight role of governance for knowledge and information management.	Governance should seek assurance that the landlord knows its products, services and residents well, and that it uses this data to inform business and financial planning.	<p>The new Data and Insight Strategy (due to be published later this year) for Brent Council includes specific commitments to developing a strong data culture across the organisation.</p> <p><u>Existing governance structures:</u> In terms of governance structures, the internal Data Ethics Board, consisting of senior council officers and independent, external data experts ensures the Council uses data in the right way, in accordance with legal, ethical and best practice guidance.</p> <p>The Information Governance Group, comprised of senior representatives from each service area, sets standards and develops the Councils approach to information governance, including sharing protocols.</p> <p>The Housing Digital Board (HDB) meets monthly to discuss digital and data challenges and opportunities specific to the housing service, escalate areas of concern and direct the digital transformation programme for the service.</p> <p>The Brent Data Network, a cross-council staff-led group open to all officers, meets regularly to share best practice and discuss and collaborate in resolving common data challenges.</p> <p><u>Examples of work ongoing:</u></p> <ul style="list-style-type: none"> • A programme of data quality work has started in Housing, with a cleanse of void property data in Northgate Housing as the first priority area and intention to move on to wider property / asset management data as a next step. • New True Compliance system has been procured so that all compliance information can be held in one place. Full transfer to this system is set for September 2023. • Engagement officers have been utilising door knocking and estate roadshow events to improve the contact data held for our tenants, specifically focusing on areas where there are gaps in contact data. 	<ol style="list-style-type: none"> 1. Review of the remit and update to terms of reference for the HDB to ensure focus is aimed at priorities for the service 2. Shape the digital programme for housing around improving data quality across the service and prioritise the work starting on Northgate Housing re. BHM housing stock, agree governance of this project with HDB. 3. Ensure BHM is in a position to meet regulatory requirements from April 2024 which requires accurate, individual property level reporting for decency, compliance and repairs and maintenance. 4. Embed a refreshed tenancy verification visit programme and ensure it is used as an opportunity to update tenant contact, socio-demographic and household information, including vulnerabilities / support needs.
2	Implement a knowledge and information management strategy	This should include: <ul style="list-style-type: none"> • defining knowledge and information management • clear definitions of which data repository is to be used for which datasets • the implementation of an Information Asset Register so you know what data you already have, what you don't have, and what you need 	<p>The new Data and Insight Strategy for Brent Council defines knowledge and information management across the organisation and sets out a delivery plan for improving data quality, the culture around data management, the technology being used and staff skills.</p> <p>The strategy includes actions to:</p> <ul style="list-style-type: none"> • Map data architecture across the organisation • Ensure 100% of information Asset Register reviews are completed annually • Improve consistency in system usage / integrate systems where possible to provide improved, more joined-up services 	<ol style="list-style-type: none"> 5. HDB to invite the Head of Change and Insight and the Strategic Data Manager (once in post) to a meeting for an overview of the new Data and Insight Strategy and a discussion re. what this means for the housing service. 6. Include reference to consistent and effective record keeping / data and information management as part of the updated JD's under the planned re-organisation.

		<ul style="list-style-type: none"> outcomes-focused data mining: what you are trying to achieve and what do you need the data for? how it aligns with the overall business strategy and the need for continuous service improvement what the expected standards are, how they will be monitored, and the consequences of failing to adhere to them 	<ul style="list-style-type: none"> Develop data quality standards / measures 	
3	Benchmark against other organisations' good practice in knowledge and information management.	This should underpin a continuous improvement approach to service delivery.	<p>Brent Housing Management is a member of Housemark and submits benchmarking data annually. Once a year, a tailored feedback session is also held with the Housing senior management team and Housemark data specialists with outputs from this being used to inform improvements and service plans for the following financial year.</p> <p>BHM have also recently engaged with a cross-London benchmarking group for the Ombudsman KIM report, the first meeting being due to take place at the end of September 2023.</p>	<p>7. Better utilise our membership to Housemark Clubs where there are networking and learning opportunities re. best practice by ensuring attendance from service representatives and any key learning is fed back effectively.</p> <p>8. Attendance at the London Councils KIM benchmarking group and report best practice to HDB</p>
4	Review safeguarding policies and procedures	To ensure data analysis forms part of a landlord's proactive activities to satisfy their duties	<p>The Housing Service follows corporate policies and approaches regarding safeguarding policies and procedures. There is functionality in CRM to record vulnerabilities and the tenancy audit function allows for safeguarding referrals to be made where needed.</p> <p>London safeguarding protocol*</p>	<p>9. Ensure all housing staff and contractors are trained in when and how to make a safeguarding referral</p> <p>10. Consider how safeguarding and safeguarding referral data can be better used to ensure the housing service is satisfying safeguarding duties and provide more targeted / tailored services</p>
5	Train staff on the requirements of the Equality Act 2010	Particularly with relevance to the importance of knowledge and information management as a tool for compliance	<p>Brent Council facilitates corporate Equality and Diversity training, however it is not widely known about or attended.</p> <p>There is also training available, at request, regarding carrying out Equality Impact Assessments (EIA).</p>	11. Recommend that the corporate Equality Act training becomes mandatory as a refresher course, similar to that of data protection
6	Review internal guidance around recording vulnerabilities	Particularly to ensure temporary, as well as permanent, vulnerabilities are recognised, recorded and then removed from records once no longer appropriate	There is functionality in Housing Management CRM to record tenant vulnerabilities, however this is not kept updated in a consistent way and so is not well utilised to inform service delivery.	<p>12. Review (and update as needed) functionality re. recording vulnerabilities in Dynamics, ensuring this is considered for both permanent and temporary vulnerabilities.</p> <p>13. Ensure all Housing staff are aware of the functionality and how and when to update this on customer profiles (including when to remove)</p> <p>14. Develop reporting on vulnerabilities / ensure steps are included in processes i.e. repairs that encourage checking of vulnerabilities data so service delivery can be tailored where needed</p>
Devise key recording standards				
7	Develop organisational key data recording standard requirements that will ensure good records that support the business and demonstrate compliance with national standards	This should set out the minimum standard to which data must be entered in the various databases owned by the landlord.	<p>The new Data and Insight Strategy sets out an action for generic data quality standards / measures to be developed for use across all services in Brent Council.</p> <p>There are no specific standards currently in place for the housing service.</p>	15. Consider utilising the HACT data standards, as recommended under the Better Social Housing Review, to set out the requirements for housing service data management.
8	Make adherence to the minimum standard for knowledge and	The quality of information sharing should form part of the assessment at procurement stage.	This is not in place across some contracts / SLA's and, where it is, it is light touch and not rigorously managed as part of ongoing contract / SLA management.	16. Review knowledge and information aspects of ongoing contracts / SLA's and agree more robust approach for all future contract procurement / SLA's.

	information management part of the service level agreement with third parties			
9	Have a clear categorisation system for ATIS/FOI requests	This allows quick identification of whether the question has previously been answered and analysis of which systems require refinement to answer questions in future.	CRM functionality in Brent does not currently allow for clear categorisation of FOI requests.	17. Consider enhancements to CRM functionality to improve categorisation of requests coming in or look into use of AI to assess themes across FOI's. 18. Agree process for publication of FAQ's, including regularly refreshed data on key asks.
10	Publish FAQs on websites and keep them updated	This allows for information self-service and reduces resourcing requirements.	This isn't currently happening in Brent but there is the infrastructure available to do so. Moving forward, the incoming regulatory requirements to publish performance information will also support information self-service for residents.	19. Identify regular asks coming in through FOI's / service requests and publish these on Brent Open Data or the BHM pages on the website. 20. Finalise approach to publishing BHM performance data
Ensure appropriate systems are in place				
11	Review existing databases for capability and capacity to record those key data requirements	To ensure databases are capable of adequately capturing information about residents – e.g. vulnerabilities. To ensure databases are capable of adequately capturing information about homes – e.g. repairs and stock condition.	A number of systems are used to capture housing stock data including Northgate, Lifespan, Dynamics and True Compliance. Resident data is held in Dynamics.	21. Consider and confirm that systems currently in use are adequate and capable of requirements moving forward re. data capture, maintenance, and reporting for residents and housing stock information. 22. Ensure the 'golden thread' re. the Building Safety Act 2022 can be effectively delivered on through systems in use and, if not, identify alternative solution
12	Train staff on using systems	Including minimum data standards, performance measures and quality assurance processes	Training on systems takes place at the point of new systems / a change being implemented but there is currently no infrastructure in place for ongoing refresh training or structured training for new starters. There is a lack of guidance available for staff to refer to re. system use.	23. Offer to be finalised and agreed at HDB re. handover of new systems / system change which includes training to be delivered, how and by who, as well as guidance and its format i.e. 'how to' videos, written documents etc. and ownership of expertise handover to super users in operational teams. 24. Agree approach for new starter induction re. system training
13	Ensure databases are easy to interrogate, and that the data can be extracted and used	Staff should be able to easily access the information they require. This is essential for evidence-based practice and informed decision-making. Where systems can be interrogated effectively, this produces crucial insight regarding patterns, themes and potential shortfalls.	Whilst dashboard and reporting functionality is available in CRM to both officer and manager level staff, data quality in the system significantly impacts the value these currently offer and training for improved staff understanding of how to use them would be beneficial. Data quality is also a challenge in Northgate Housing which impacts effective interrogation.	25. Prioritise improving data quality across Northgate and CRM and embed exception reporting in manager dashboards so they can more easily manage case work standards across their teams. 26. Include dashboard training in any agreed training programme / ongoing training approach for the service.
14	Schedule appropriate sensitive information reviews	Resident information and personal characteristics change on a regular basis. Records should be appropriately reviewed to ensure a landlord continues to know its residents – disability or illness, financial difficulties and family composition.	Key resident information is collected at sign-up but is not consistently updated throughout the tenancy with BHM.	27. Embed a refreshed tenancy verification visit programme (detailed action under recommendation 1) 28. Embed operational performance monitoring tools so managers have oversight of tenancy verifications due, completed, overdue etc. 29. Promote how residents can update their own information and why this is important
Mergers and other structural changes				
15	Stress test systems prior to change	To identify whether they can 'talk' to each other; data can be securely transferred, and staff from each landlord can access the data they need	Whilst there are no mergers planned for BHM it is noted that, as part of the digital transformation process in Brent, stringent user-acceptance testing (UAT) and risk monitoring takes place when implementing any change to systems and/or data migration.	NA

16	Undertake a risk assessment regarding knowledge and information shortfalls before the change	This should be a living document with clear risks and mitigations documented, incorporating a review cycle and emerging risk identification. This document should continue beyond the date of change.	As above	NA
17	Proactively investigate incoming datasets during mergers	Identify gaps in the knowledge of incoming stock and residents, and work to fill those gaps.	As above	NA
18	Establish clear data exception reporting processes	This allows the new organisation to identify issues post-change quickly	As above	NA
Repairs				
19	Set out clear requirements of operatives before they are allowed to record an appointment as missed	This should include ensuring that the appointment was notified to the resident, it was made at a time they could attend, checking that any contact requests were adhered to, guidance on what level of contact (e.g., Two door knocks, calling the resident) etc	Agreement with contractor that appointments should only be logged as 'missed' when they have been previously agreed and confirmed with the tenant. Operatives will knock multiple times and wait 15 minutes before leaving.	30. Review approach to managing missed appointments with input from key stakeholders (including tenants), and ensure approach is documented and communicated to Brent staff, contractors and tenants.
20	Conduct wastage analysis on missed appointments	Use the insight generated by accurate records of missed appointments to identify efficiencies and action plans, including whether a broader time range of appointments would be of benefit.	There is no existing reporting or analysis being carried out on missed appointments.	31. Introduce reporting on missed appointments
21	Implement an automated appointment reminder system	This could take the form of text messages the day before.	There are 3 types of appointment slots available for BHM repairs (8am – 1pm, 10am – 2pm and 1pm – 5pm). Tenants receive an automated text message to confirm appointment once it is booked and a further automated message when the operative is on route.	NA

Spotlight on: attitudes, respect and rights– Brent Council housing management service – self-assessment – July 2024

Recommendation	Current position	Proposed actions	
Culture, vision, and values			
1	<p>Review your mission statement to ensure it is reflective of your current, and future, service. Consider at Board level if you are assured your current approach to vulnerabilities is working.</p>	<p>The Council does not have a set mission statement re. supporting vulnerable residents, although does have an internal Accessibility Guidance document for staff which sets out information, advice and guidance for staff to ensure any activity they undertake in the course of their work is accessible to everyone. Awareness of this document is relatively low currently and so needs to be communicated more widely.</p> <p>The Housing Management Service has recently developed an improvement plan which incorporates a commitment to developing a vulnerability and reasonable adjustments policy for the service in line with the Ombudsman’s recommendations. Our approach to vulnerabilities will be reviewed as part of the development of this policy.</p>	<ol style="list-style-type: none"> 1. Embed the corporate accessibility guidance document as part of the housing management induction process for staff to improve awareness of it. 2. Review our approach to supporting vulnerable residents and develop a vulnerability / reasonable adjustment policy for the housing management service which: <ul style="list-style-type: none"> - Is cohesive with the corporate accessibility guidance; - Is reflective of the Ombudsman’s’ recommendations; and - Meets the specific needs of our tenants.
2	<p>Undertake a review at Board level as to whether you are currently offering a ‘human-centric’ service provision. If not, identify the barriers to this and what needs to change in order to introduce and then embed this culture and ethos.</p>	<p>A new housing management improvement board is due to be set up which will be where the delivery of the above-mentioned improvement plan and review of our approach to vulnerabilities will be monitored.</p>	<ol style="list-style-type: none"> 3. Set up the housing management improvement board as agreed at CMT, to monitor the ongoing improvement plan.
3	<p>Consider adopting a values-based recruitment model to improve resident/landlord relationships.</p>	<p>The housing management service has been working with HR to review and improve the recruitment process. Throughout the recent restructure recruitment, interviews have prioritised behaviours and values of new starters, acknowledging that specific technical skills can be developed once onboard.</p> <p>There has also been specific focus vulnerable tenants during interviews, for example, a recent question asked during interview was “What is your understanding of our responsibilities towards vulnerable tenants, and what would you do to ensure that they are appropriately supported by the service?”.</p>	

What does the resident need?			
4	Review your vulnerability policy in conjunction with current practice. Is the policy being implemented? If not, identify where the disconnect lies.	<p>Whilst there are instances where vulnerabilities / individual needs of tenants are being proactively considered e.g. 'household audits' during planned works to assess needs and the implications of the work re. this so suitable support can be put in place, this is not documented. There is no vulnerability policy / strategy currently in place for the housing management service.</p> <p>There is also some lack of awareness re. correct safeguarding referral routes. This needs to be clarified and guidance documentation created for staff to refer to.</p>	<p>See action 2.</p> <p>4. Confirm safeguarding referral routes for housing staff, confirm forms and key contacts are correct and create guidance document.</p>
5	Implement a vulnerability strategy, including how it is defined, who assesses, and what the review process is. This must be in line with The Equality Act, the Human Rights Act and the Care Act. This should be co-produced with residents, and consider any future good practice guidance published by the Housing Ombudsman, following engagement and consultation.	As above.	As above.
9 page 284	Implement a specific reasonable adjustments policy.	There is no reasonable adjustment policy currently in place for the housing management service.	See action 2.
	Test the vulnerability and reasonable adjustments strategy and policy against the '3Rs' on vulnerable residents – recognise, respond and record.	NA	5. New vulnerability and reasonable adjustments policy to include reference to the three R's – recognise, respond and record.
8	Introduce minimum staff training requirements such as Dementia Friends, and training on customer care, mental health, learning disabilities, and sight and hearing loss.	<p>The housing management service are in the process of developing and implementing a new induction offer which includes a set of core training courses for new starters. These courses range from more general i.e. 'supporting vulnerable customers' and 'customer care' through to specific vulnerability related courses s i.e. 'working effectively with hoarders'.</p> <p>This training programme will be embedded from end of Q2 2024-25 and will be reviewed at end of each financial year.</p>	6. Moving forward, use analysis of demographic data, characteristics and known vulnerabilities across our tenant population to inform the refreshed core training programmes on an annual basis.
9	Consider a dedicated taskforce for vulnerability.	There is no specific taskforce for vulnerability currently in place, this may come out of our review and policy development work in this area. We could also consider nominating manager level 'leads' in key strategic areas i.e. vulnerability/safeguarding lead, ASB lead, property services lead.	NA.

Look to the future			
10	Carry out your own “Resident of the Future” forecast for the next ten years. Draw upon the available information around demographics, both locally and nationally, and identify where you foresee the gaps being.	Whilst light touch assessments of demographic information held has been done (and some data quality issues identified), a specific analysis has not been carried out.	7. Work with the Change and Customer Insight service to run a ‘resident of the future’ forecast and develop an approach to addressing gaps identified.
11	Consider the ageing communities specifically in rural and coastal areas, with reference to Professor Whitty's report	Approximately 27% of our tenant population is aged 65 or over, with a further 27% aged 55 – 64.	8. Consider specific staff training for supporting aging tenants and ensure the reasonable adjustments policy supports adjustments for older people as needed.
12	Devise an action plan for what you need to start putting in place from now onwards to ensure you are ready to meet the needs of your future residents. This should include the anticipatory requirement regarding reasonable adjustments.	Any actions will be agreed following the completion of the ‘resident of the future’ exercise to be carried out (see recommendation 10, action 6).	
Complaint handling			
13	Raise awareness of the complaints procedure and ensure it is accessible for residents who may face barriers to raising a complaint, as required by the Complaint Handling Code	Information about how to make a complaint, our complaints policy and procedure, complaints performance and escalation options are available on our website here . The policy includes reference to accessibility options if someone needs them. The Council has previously supported national awareness campaigns such as ‘Make Things Right’ to ensure tenants who need support know how to make a complaint.	9. Include complaints awareness as part of the communications plan for the housing management service moving forward.
14	Ensure the complaints policy permits complaints about staff conduct, attitudes and approach.	Brents complaints policy does permit complaints about staff conduct, attitudes and approach.	
15	Establish and enforce a clear process for how complaints about bullying/discrimination will be investigated.	Complaints about bullying or discrimination are managed in line with our usual complaints process.	
16	Contact restriction policies must set out clear timescales, review and appeals process. Where there is single point of contact, this should be applied consistently.	The Council has a Vexatious Complaints Policy which includes reference to contact restrictions as an optional action. The policy does not set any generic timescales for review, instead requires the relevant Director to set a timeframe for each individual case.	10. Consider developing generic timescales for review of contact restrictions to ensure consistency and fairness in these cases. 11. Consider publishing the vexatious complaints policy on the website.
17	Calls to be recorded, either a physical recording or a contemporaneous telephone record.	All calls to our corporate contact centre (which is the first line of contact for tenants reporting repairs etc. by phone) are recorded. Calls to individual officer phone lines are not recorded.	

Case handlers			
18	Landlords need to ensure they provide clear explanations; repeat information where needed, including in different formats; offer face-to-face contact as much as possible and a named point of contact; investigate concerns and share the outcome; recognise when things have gone wrong, apologise and explain how these will be addressed; and know when to make appropriate referrals to agencies and whom to signpost to. Underpinning all of these should be a baseline of empathy and respect.	<p>Whilst it is expected that complaint case handlers meet all of the actions set out here and complaint response templates cover some of this, no specific guidance documentation is in place for staff to refer to.</p> <p>The engagement team work with involved residents on a re-occurring basis to carry out a scrutiny exercise re. complaint responses and this recommendation can be incorporated into their checks.</p> <p>There is no internal approach to regularly auditing complaints responses although our improvement plan does include this as a commitment.</p>	<p>12. Develop guidance document for staff on expectations re. complaint responses.</p> <p>13. Ask the involved residents to utilise the recommendation re. complaint responses set out here in their next scrutiny exercise.</p> <p>14. Develop an internal approach to auditing complaint responses.</p>
19	Ensure disability or language needs are routinely considered as part of the complaints process and that extra accessibility support, or accessible materials, are offered where appropriate.	The complaints policy includes reference to accessibility options available to those who need them and the understanding is that this should be being offered where appropriate during the complaints process.	15. Use complaint auditing to confirm accessibility support is being offered.
20	Identify where more specific training, guidance or support is needed to fulfil your role. For example, do you feel under confident in having what may be seen as a difficult conversation or delivering bad news?	Under the in-house Skills Academy, the service is developing an induction programme, along with a reactive offer to respond to training needs as and when they arise. This can incorporate any training need identified re. responding to complaints.	16. Carry out complaint response spot checks and gather feedback from complaint response handlers to identify any training requirements.
21	Maintain accurate records of residents' vulnerabilities and individual circumstances.	Data held re. resident vulnerabilities in the service's CRM system is unreliable due to issues with data quality some key functions spanning across multiple systems. The Council is currently in the process of taking a strategic look at this issue, working across areas like public health, adult social care and housing to develop a new approach to sharing and maintaining vulnerability data.	17. Feed into the corporate work ongoing re. improving our approach to recording and maintaining resident vulnerability data.
22	Use mandatory checks, such as annual boiler checks, as a 'touchpoint' opportunity to undertake welfare checks with residents.	<p>The service is implementing a programme of tenancy audits which include welfare checks. Each property will receive a tenancy audit at least once every 4 years.</p> <p>Our contractors have 'concern cards' which they can use to feedback to the service if they notice anything they want to flag re. tenant welfare.</p>	
23	Although it is important for landlords to know the vulnerabilities and individual circumstances of its residents and any associated legal duties, the above	This will be considered as part of the review of our approach to vulnerability and subsequent	

approach should apply to all residents as, fundamentally, it is about a high standard of customer care and a human-centric approach to service delivery.

development of the vulnerability and reasonable adjustment policy.

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Brent

Complaints Policy

Version 9 – July 2025

Owner: Corporate Director of Finance and Resources

Version Control Table

Version Number	Date	Purpose/Change	Reviewer / Authoriser
1.0	15/05/2015	Original Policy	Director of Performance, Policy and Partnerships
1.0	24/08/2017	Revised Policy	Corporate Management Team
1.0	20/02/2019	Revised Policy	Corporate Management Team
2.0	12/03/2019	Updated Policy approved by CMT for publication on the Council's website	Head of Performance & Improvement Complaints & FoI Manager
3.0	30/04/2021	Review and amendments to current Policy	Head of Executive and Member Services Complaints & FoI Manager
4.0	16/02/2022	Review Policy and amendments made in compliance with the Housing Ombudsman Complaints Handling Code	Head of Executive and Member Services Complaints & Casework Manager
5.0	12/05/2023	Changes to stage 2 complaint sign off	Head of Executive and Member Services Complaints & Casework Manager
6.0	31/05/2024	Incorporate Complaint Handling Code changes	Deputy Director Democratic Services Complaints & Casework Manager
7.0	01/08/2024	Update to Corporate Complaint timescales	Deputy Director Democratic Services Complaints & Casework Manager
8.0	04/02/2025	Update to Remedies section	Brent Assurance Board Complaints & Casework Manager

9.0	21/07/2025	Update following Housing Ombudsman's review of the Council's Complaints Policy	Deputy Director Democratic Services Complaints & Casework Manager
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1 About this document

This document sets out Brent Council's position on complaints.

2 Policy Statement

We recognise the importance of customer complaints and welcome them as a valuable form of feedback about our services. Our aim is to resolve matters as effectively and quickly as possible. We will use the information gained from complaints to help improve the quality of our services.

- When we have done something wrong and it has had an adverse impact on a customer, we shall endeavour to put things right.
- We shall act fairly and proportionately.
- We will be open and accountable for any failures.
- We will acknowledge all complaints and respond to all complaints in a timely manner and within relevant timescales.
- If customers are dissatisfied with how we have handled their complaint, we will advise customers of their rights to appeal to the relevant body.
- We will ensure that there is a complaint provision for any Council services provided by a partner agency.
- We will learn from complaints and implement service improvements.
- We will process all personal information relating to complaints in line with the General Data Protection Regulation 2018.

3 Scope

3.1 What is a complaint?

A complaint is defined as an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual or several individuals.

Typically, a complaint could be about:

- Delay in taking action without good reason
- Failure to provide a service
- Mistakes in the way a decision was taken
- Not following the law or the Council's own rules
- Broken promises
- Giving incorrect or misleading information
- Bias or discrimination
- Rude, unhelpful or inappropriate behaviour by staff
- Poor communication

A person does not have to say the word 'complaint' for it to be treated as such, and likewise when a person states they are making a 'complaint' it may be that the issue does not fall within the category of a complaint and is more appropriately dealt via a different route such as a service request. This can include instances where a customer is 'complaining' about a problem that the Council has not created, such as neighbour noise nuisance. The same can be true for a 'complaint' received to report a repair request. These are requests to the Council for appropriate action to be taken. If a complainant expresses dissatisfaction with a response to a service request, then a complaint will be logged whilst we continue to address the issues that have been raised.

An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, we will provide details on how a complaint can be made should that individual wish to pursue a complaint with the Council about the matter.

3.2 Who can make a complaint?

Anyone who uses and/or is individually affected by our services can make a complaint. We cannot investigate complaints where there has been no personal injustice (in other words, where the complainant has not been directly affected by the matter raised).

If you require help making your complaint, you can ask a friend, family member, carer or someone you trust to talk to us on your behalf. You can also be represented or accompanied at any meeting with the Council. Whoever acts on your behalf, will need to provide written consent from you before we undertake an investigation or report our findings to them. **Any complaint that is submitted via a third party or representative is handled in line with the Council's complaints policy.**

Complainants are able to access support from external agencies and representatives in order to assist with the complaint process. These include organisations such as Citizens Advice, Age UK, MIND, equalityhumanrights.com, Carers UK, etc.

If a child or young person is making a complaint under the Children's statutory legislation, then they can request the services of an advocate and should make this request known to the Complaints Service team.

Concerns raised by partner organisations about our services and concerns raised by staff or job applicants about their employment are outside the scope of this policy. Expressions of dissatisfaction against democratic Council decisions are also not covered by this complaints policy, nor are matters that are subject to a statutory right of appeal (see Appendix 1 for a list of some of these).

Reasonable Adjustments

The Equality Act 2010 introduced the Public Sector Equality Duty (PSED) which we consider when carrying out our day-to-day functions, crafting policies and delivering services. All staff undertake equality and diversity training, which is part of the Council's essential training programme. The Council is committed to ensure that all residents can access its services and are not disadvantaged in any way. Below are some of the adjustments that can be offered:

- use of email or telephone in preference to hard copy letters
- use of plain English or Easy Read service on our website
- communication through a representative or intermediary
- rest or comfort breaks in meetings.
- provision of information in appropriate alternative formats (eg large print, Braille, coloured paper etc.)
- provision of auxiliary aids

Residents can indicate when raising a complaint whether they have any disabilities or require any adjustments. This information is then recorded on their complaint record.

3.3 How can a complaint be made?

A complaint can be made in writing, via email, by telephone, in person or by using the online form or portal. The Council also accepts complaints raised via social media channels, where the Council has an official account for that platform and the complainant directs their issue to the Council's social media account. The Council will maintain confidentiality and privacy and make contact through direct message requesting for any further details before the complaint is logged on the Council's case management system for a response in line with this policy. Complaints can also be submitted via Councilors or representatives. The Council accepts complaints in all forms including, verbal, written or online.

3.4 When can a complaint be made?

The Council will accept complaints made within 12 months of the issue occurring or the individual being made aware of the issue, unless excluded on other grounds such as the ones outlined in section 8.1 of this policy. The Council will not normally accept a complaint where the customer has delayed raising the complaint with the Council by more than 12 months.

The Council recommends that contact is made as soon as possible, to ensure access to data is readily available. Complaints exceeding 12 months will be considered on a case by case basis.

We will not investigate matters that have already been considered and addressed through our Complaints procedures. If a complainant is dissatisfied with the outcome, they have the right to escalate those matters to the relevant Ombudsman. Where legal proceedings have already been initiated, this is usually where a claim form or particulars of a claim has been filed at Court, the Council will also not investigate these matters as they will be addressed through Court proceedings.

We will not take a blanket approach to excluding complaints; we will consider the individual circumstances of each complaint. If the Council decides to not accept a complaint, the complainant will be informed of the reasons as to why the Council will not investigate under the Complaints process and be provided with escalation rights to the relevant Ombudsman.

3.5 How will the complaint be dealt with?

All complaints will be dealt with in accordance with the requirements of the Data Protection Act 2018, Equality Act 2010, subsequent legislation, and associated Council policies. We will deal with complaints on their merits, act independently, give the complainant a fair chance to set out their position, take measures to address any actual or perceived conflict of interest; and consider all relevant information and evidence carefully. Social Care complaints will be investigated in line with the current regulations. Information provided to the Council for the purposes of a complaint investigation will not be used for any other purposes without the complainant's consent unless the Council feels there is a safeguarding concern, for the protection of others, or where there is a legal duty to do so.

A copy of the Complaint Team's Privacy Notice can be found on the following link: [Complaints Privacy Notice](#). The Council will only investigate complaints made on behalf of somebody else if we have that person's explicit written permission to do so. The Council will not normally accept anonymous complaints (a complaint where a customer has not provided their contact details) unless it relates to a child or young person.

The Council will initially assess the complaint to ensure that it meets the criteria of a complaint as defined in Section 3.1 of this document, and the complainant cannot achieve a

Complaints Policy

resolution through other means such as those highlighted in Appendix 1. **The complaint will then defined, logged and formally investigated, the complaint will be responded to within the Council's specified timescales. Details of timescales can be found in Appendix 2.**

The Council will aim to respond to complaints as early as possible and specifically where there are any risks or vulnerabilities involved and the issue is current/live. Where the complaint relates to historic issues or is complex these may take longer to investigate.

The Council will work collaboratively with colleagues and collectively take responsibility of complaints. There will be occasions where complaints that span several service areas will need to be investigated individually by each service area and their relevant parts of the complaint responded to accordingly. Similarly, if various complaints are received from a complainant which cover the same service area, the Council may group all the complaints so that the service area can investigate and provide one response.

A significant percentage of our customer-facing services are delivered on our behalf by third party suppliers/contractors. Our customers have the right to expect that our contractors will deliver a particular service to the same standards in terms of quality and customer care that we would seek to provide were it run in-house. This is also true for the handling of complaints in accordance with the Council's procedures.

Complaints received directly by our contractors will be addressed at stage 1 in line with their complaint handling processes. If the complainant remains dissatisfied with the response received, they have the option to escalate the complaint to the Council where a stage 2 investigation will be undertaken. All third party suppliers/ contractors will be required to follow the Council's complaints policy and the relevant Ombudsman's complaint handling code.

All complaints will be conducted in an impartial manner. Generally, complaints will be considered and signed off as per section 6.1 of this policy. However, if a complaint relates to the conduct of an officer of the Council, then the complaint will be passed to their line manager or a more senior manager to complete a thorough investigation and respond.

To ensure we comply with data protection rules, it may not be possible to keep you fully informed of any outcome or specific action taken against a member of staff. The officer investigating your complaint will provide you with as much information as allowed but this will be dependent on the nature of the complaint and will be considered on a case by case basis.

The Council reserve the right to use discretion when applying the policy and may deal with a complaint differently where individual circumstances merit it. Where this is the case, discretion will be applied fairly and appropriately so that complaints can be progressed in order to achieve a reasonable resolution.

Corporate Complaints

Corporate complaints involve a two-stage process. **Stage 1 complaints are logged, defined and acknowledged within 5 working days of the complaint being received. The acknowledgement will include our understanding of the complaint, the outcomes that are being sought, which aspects the Council is or isn't responsible for and if there are any aspects that are unclear clarification will be sought.** We aim to respond within 10 working days of the complaint being acknowledged. However, where a complaint is complex, covers a lot of historic data or there are various strands to the complaint, the Council may extend the complaint by up to a further 10 working days. The investigation will be carried out by officers employed in the service area to which the complaint relates. The response is signed off by the relevant Head of Service, Director or a manager delegated to act on their behalf as

Complaints Policy

appropriate. In the majority of cases, matters are resolved at this point. However, the complaint can be progressed directly to stage 2, if all or part of the complaint is not resolved to the complainant's satisfaction. Details of how complainants can escalate their complaints to stage 2 will be contained in the stage 1 response.

If the complainant does wish to proceed to this stage, although not a requirement we ask that they clearly state what parts of their complaint have not been addressed satisfactorily and the reasons why so that the investigator can focus the investigation and identify the aspects of the stage 1 that did not sufficiently remedy the complaint and for any outstanding points to be addressed in the stage 2 response.

Complainants should make any escalation request within eight weeks of a first stage response being issued, because matters become harder to investigate as more time passes. If there is a valid reason as to why a complaint will not be escalated, the Complaints Service will issue the complainant with a response detailing why it has decided not to pursue an investigation. Some of the reasons for not escalating a complaint can be found in section 8, Appendix 1.

Stage 2 complaints are investigated independently from the department by the Complaints team. Stage 2 complaints will be logged, defined and acknowledged within 5 working days from the receipt date of the Stage 2 request. The acknowledgement will include our understanding of the complaint, the outcomes that are being sought, which aspects the Council is or isn't responsible for and if there are any aspects that are unclear clarification will be sought. We aim to complete the investigation within 20 working days of the complaint being acknowledged. However where a complaint is complex, covers a lot of historic data or there are various strands to the complaint, the Council may extend the complaint by up to a further 20 working days. If the complainant still remains dissatisfied, they have the opportunity to have their complaint considered by the Local Government and Social Care Ombudsman (LGSCO) or the Housing Ombudsman, details of which will be included in the response.

Statutory Complaints

Some complaints received by or made on behalf of children regarding Children's Services can be considered under the Children's Statutory Complaints Procedure¹. The Children's Statutory Complaints Procedure has three stages.

- **Stage 1** - Stage 1 is acknowledged within 5 working days and answered by the Service Area and signed off by the relevant Head of Service or a manager delegated to act on their behalf as appropriate within 10 working days. The Stage 1 can be extended to 20 working days if the investigation is complex. The response will provide information on how to escalate to Stage 2 of the procedure.
- **Stage 2** - Stage 2 is investigated by an Independent Investigator who is independent of the Service Area and an Independent Person (independent of Brent Council but appointed by the Council). On completion and agreement of a complaint statement the investigation will take up to 25 working days, or up to a maximum of 65 working days if it is a complex case. The Independent Investigator will provide a report on their investigation to the Council, which is passed to a Director, Children and Young People, for adjudication. The Council's decision will be provided to the complainant. If the complainant remains unhappy, they will be advised on how to make a request for a Stage 3 Review Panel.

- **Stage 3** - If the complainant requests to escalate their complaint to a Stage 3 Review Panel, the Council will aim to arrange this within 30 days of the request being received from the complainant. The Panel will then provide a report to the Council, within 5 working days and the Council will send a copy of the report to the complainant at this stage. The Corporate Director of Children and Young People will adjudicate and provide the complainant with a response to the panel's findings within 15 working days. If the complainant remains dissatisfied, they have the opportunity to raise their concerns with the LGSCO.

Complaints about Adult Social Care also follow a statutory complaints procedure, which is governed by law². Statutory Adult Social Care Complaints have a one stage process which can take up to a maximum of 6 months to complete from the date of receipt. On receipt of a complaint, it is to the relevant service area for investigation. The complainant will initially receive a provisional response to their complaint within 20 working days from the relevant Head of Service. If the complainant remains dissatisfied with the outcome of their complaint, they can ask for the response to be reviewed. It will be reviewed by the Director, Adult Social Care, or Corporate Director, Community Health and Wellbeing. Complainants are encouraged to make any escalation request within eight weeks of receiving a provisional response, listing reasons as to why they remain dissatisfied.

Once an escalation request is received, a final response will be issued to the complainant within 30 days. However, if the complaint is complex and the Council require more time to investigate, the complainant will be informed in writing of the new timescale which will be up to a maximum period of 6 months. The response will include a paragraph detailing how the complainant can escalate their complaint to the LGSCO if they wish to do so.

3.6 When will I receive a response to my complaint?

Timescales for responses will depend on the type of complaint. Corporate complaints will be acknowledged within 5 working days and will normally be answered within 10 working days of the complaint being acknowledged, and 20 working days of the complaint being acknowledged at stage 2.

There will be circumstances in which this is not possible, in which case the complaint may be extended by a maximum of 10 working days at stage 1 and 20 working days at stage 2 of the complaints process. If the case is extended, complainants will be advised of the reasons for extension, the likely response date and be provided with contact details of the relevant Ombudsman. Details of all complaint timescales can be found in Appendix 2.

On occasions where additional time is required beyond the extended timescales noted above (more than 20 days from stage 1 acknowledgement or more than 40 days of the complaint being acknowledged at stage 2) the investigator will agree with the complainant suitable intervals for being updated on their complaint.

If the Council requires more information to complete its investigation, this will be requested from the complainant and the case paused until the information is provided. If the information is not received by the specified date, the investigation may be completed based on the information that is available at the time.

Where complaints may also be connected with other procedures, such as legal or disciplinary proceedings, or we need to liaise with other parties to resolve the complaint, often, in the interests of fairness, a response cannot be provided until these processes have been completed. The complainant will be informed if the Council is unable

to respond at the time.

There may be occasions where circumstances fall beyond the control of the Council resulting in the complaint response being delayed. Depending on the circumstances, the Complaints Service may also need to pause its investigations. Where this is the case, the Complaints Service will write to the affected complainant(s) to make them aware of this with an explanation for any delays. There may also be occasions where more time is required due to the complexity of the complaint or where the complaint covers several years of history. In these instances, the complainant will be informed and updates will be agreed at suitable intervals. Once a date is known the complainant will be informed as to when they are likely to receive a response. Complaints may be extended with the approval of both parties if additional actions need to be taken to confirm or clarify a particular issue and consider any findings.

If additional related information or complaints are provided during the course of the investigation, the Council will incorporate them into the stage 1 response if the response has not yet been issued, however we may need to extend the response time to consider the new information. It is therefore important that all supporting information is provided at the time the complaint is lodged. Any new issues will be logged as a new complaint if the stage 1 has already been issued, the issues are unrelated, or it would unreasonably delay the response.

3.7 Complaint Closure

Complaints will normally be closed once an investigation has been completed and a response has been provided to the complainant. If there are any outstanding actions following a complaint response at any stage, these are logged on to the Council's complaint system with an agreed timescale and tracked to completion. Updates on these outstanding actions will be provided to the complainant. Complaints may also be closed if a resolution has been agreed and the Council are taking steps to deliver the action/s.

There may be occasions where the complainant no longer wants to pursue the complaint, for example, if their situation changes or a resolution has been provided before an investigation has been conducted. In these circumstances the complaint will be closed on the Council's system as withdrawn/not pursued.

If a complaint has been rejected for any reason, the complaint will be deemed closed as of the date the notification of the rejection is provided to the complainant. The complainant will be notified in writing where a complaint has been rejected and provided with the reasons. Some of these reasons can be found in Appendix 1.

If the complaints procedure has been exhausted and the complainant is still dissatisfied with the response provided by the Council, the next step would be to refer their concerns to the appropriate Ombudsman.

Some complaints are within the jurisdiction of the Housing Ombudsman, and others are the responsibility of the Local Government and Social Care Ombudsman (LGSCO). Occasionally a complaint may be considered by both Ombudsman schemes. Within your complaint response the Council will provide the escalation process for the most appropriate Ombudsman.

Complaints covered by the Housing Ombudsman can be referred to the Housing Ombudsman by post at Housing Ombudsman Service, PO Box 1484, Unit D, Preston,

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PR2 0ET; by using the online complaint form on their website: <http://www.housing-ombudsman.org.uk>; by email to info@housing-ombudsman.org.uk or telephone on 0300 111 3000. Please note you can contact the Housing Ombudsman Service at any point during the complaint process. It cannot investigate your complaint whilst your complaint is going through our internal complaints procedure however the Ombudsman may be able to help you reach a resolution through mediation or assistance. We cannot however prejudge any action the Ombudsman may take.

For complaints covered by the Local Government and Social Care Ombudsman, the complainant has the option of referring their complaint to the Local Government and Social Care Ombudsman (LGSCO). The Ombudsman may then consider the matter further. The address is Local Government Ombudsman, PO Box 4771, Coventry CV4 0EH (online complaint form available at: www.lgo.org.uk/making-a-complaint, telephone: 0300 061 0614).

¹ The Children's Act 1989 Representation Procedure (England) Regulations 2006, Children (Leaving Care) Act 2000, Adoption and Children Act 2002, Health and Social Care (Community Health Standards) Act 2003
² The Local Authority Social Services and National Health Service Complaints (England) Regulations 2009 ('the Regulations')

4 Remedies

4.1 Remedies Guidance

The Council follows the Local Government and Social Care Ombudsman and the Housing Ombudsman's remedies guidance for complaints. The respective guidance can be found on the links below:

Local Government and Social Care Ombudsman

<https://www.lgo.org.uk/information-centre/staff-guidance/guidance-on-remedies>

Housing Ombudsman

<https://www.housing-ombudsman.org.uk/about-us/corporate-information/policies/dispute-resolution/policy-on-remedies/>

If financial compensation is awarded this can be offset against debt owed to the Council where appropriate.

5 Vexatious Complaints

5.1 How does the Council deal with vexatious complaints and unreasonable complainant behaviour?

Managing a complaint is generally a straightforward process. As a Council, we are committed to dealing with complaints in a professional, sensitive and timely manner. In a small number of cases, complainants pursue their complaints in a way that can either impede the investigation of their complaint or can have significant resource issues for the Council. In those situations, the Council will not consider complaints that are raised in an unreasonable manner and may need to classify the complainant as unreasonable, unreasonably persistent, or their complaint as vexatious.

The Council has a Vexatious Complaints Policy, which defines unreasonable behaviour, and vexatious complaints. It provides guidance so that Council staff can deal confidently, effectively and fairly with vexatious complaints and unreasonable complainant behaviour.

Dealing with vexatious complaints and unreasonable complainant behaviour diverts time from officer's duties and has an excessive impact on resources. The Council's services need to remain fair, consistent and accessible to everyone who wishes to use them.

If a complainant has exhausted the Council's complaints procedure, they will be referred to the Ombudsman. The Ombudsman's review of the complaint is considered final; therefore, the Council will not revisit any complaints that have already been considered by the Ombudsman.

6 Responsibilities

6.1 Who will respond to my complaint?

The Chief Executive has overall responsibility for complaints and oversight of complaint outcomes, which offer valuable opportunities for learning and improvement.

Corporate Directors and Directors shall be accountable for complaints performance in their departments and shall decide on final stage complaints for their departments.

Heads of Service are responsible for ensuring that remedies and service improvements identified by complaint investigations are carried out.

All staff are responsible for supporting timely and good quality complaint responses within the Council's timeframes.

Corporate Complaints

- Stage 1: Head of Service or Service Manager
- Stage 2: Corporate Director or Director

Adult Social Care Statutory Complaints

- Provisional Response: Head of Service or Service Manager
- Final Response: Corporate Director, Community Health and Wellbeing or Director, Adult Social Care

Children Social Care Statutory Complaints

- Stage 1: Head of Service or Service Manager
- Stage 2: Directors, Children and Young People
- Stage 3: Corporate Director, Children and Young People

7 Additional Information

- 7.1** The Council publishes the complaints policy on the Council's website. There is a dedicated Complaints section where you can view the policy, the privacy notice and the most current annual complaints report. **The Council will consider and try to accommodate as far as possible any requests to provide the policy and any other relevant documents in an accessible format.** Relevant Council services will advertise the Complaints Policy, the Complaint Handling Code and details of the Housing Ombudsman in regular correspondence (leaflets, posters, newsletter) with service users. The Housing Management Service will also be providing information on notice boards, at Resident Associations and will include a banner advert on emails they send to residents for short periods across the year promoting the complaints process. The Council will also hold events so that tenants, leaseholders and private landlords can gather information and raise concerns.

8 Appendices

8.1 Appendix 1 – Special Cases

Some types of complaints and appeals fall outside of our complaints policy.

The following complaints are not covered by the corporate complaints procedure:

- Complaints relating to Children's and Adult Social Care (these have their own statutory procedure, detailed in section 3.5)
- Complaints against schools
- Some educational matters
- Complaints against councillors
- Anonymous complaints
- Complaints made on behalf of individuals without their explicit consent
- Liability issues that are subject to an insurance claim
- Some commercial matters
- Most complaints where the customer or the Council has started legal proceedings or court action (but not where a customer has only threatened to do so)
- Complaints that have been appealed to a Tribunal or Minister, or have already gone to Court about the same dispute

- Criminal matters
- Employment issues

The following matters have their own appeals procedure and are not covered by this policy; these include but are not limited to:

- Penalty Charge Notices
- Fixed Penalty Notices
- Planning appeals
- Appeals against statutory notices
- Appeals relating to schools and school admissions
- Appeals against Special Education Needs assessments
- Housing and council tax benefit appeals
- Leasehold Tribunals
- Council tax and valuation discount and exemption appeals
- Appeals against the refusal of disabled badges for parking exemption
- Appeals against decisions relating to homelessness
- Freedom of Information and Subject Access Request complaints
- Data Protection complaints

8.2 Appendix 2 – Timescales

Corporate Complaints

- A response will be provided within 10 working days of the complaint being acknowledged at stage 1, with an extension of up to 10 working days if complex or multifaceted.
- A response will be provided within 20 working days of the complaint being acknowledged at stage 2, with an extension of up to 20 working days if complex or multifaceted.

Children Statutory Complaints

- 10-20 working days stage 1
- 25-65 working days stage 2
- 30 working days for stage 3 panel

Adults Social Care

- 20 working days – 6 months

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Appendix F: Complaint compensation breakdown for last three financial years

Financial Year 2024-25¹	£ Total compensation paid at first, second and Ombudsman stages
ASC	
Access, Information and Long Term Support	9552.43
Intermediate Care and Principal Occupational Therapist	2315
Learning Disability & Mental Health	16700
Total	28,567.43
CYP	
Forward Planning, Performance & Partnerships	550
Inclusion	4150
Localities	2600
Looked After Children and Permanency	4465
Total	11,765
Neighbourhoods and Regeneration	
Estate Regeneration	300
Estate Services	50
Healthy Streets and Parking	330
Neighbourhood Management	50
Parks and Green Infrastructure	400
Affordable Housing and Partnerships	1100
Regulatory Services	100
Total	2,330
Partnerships Housing and Resident Services	
Resident Services	6036.92
Communications Insight and Innovation	100
Community Development	600
Housing Services	128716.72
Housing Needs and Support	99498.64
Total	234,952.28
Grand Total	£277,814.71

Financial Year 2023-24	£ Total compensation paid at first, second and Ombudsman stages
ASC	
Access, Information and Long Term Support	1900
Urgent Care	1150
Learning Disability and Mental Health	400
Total	3450
CYP	
Early Help	200
Forward Planning, Performance and Partnerships	300
Inclusion	4850
Localities	2000
Looked After Children and Permanency	6294.69
Safeguarding and Quality Assurance	50
Total	136,94.69
Environment and Leisure	
Community Protection	850
Healthy Streets and Parking	575
Highways Management	100
Regulatory Services	300
Neighbourhood Management	825
Total	2650
Finance and Resources	
Property and Assets	150
Total	150
Resident Services	
Affordable Housing and Partnerships and Tenant Engagement	2844
Customer Services and Assessments	2276.96
Housing Management Customer Services	2480
i4B	778.75
Housing and Neighbourhoods	23028.53
Housing Management Property	88269.12
Housing Needs	36645
PHS	700
Registration and Nationality	35
Revenue and Debt	752.81
Total	157,810.17
Grand Total	£177,754

Financial Year 2022-23	£ Total compensation paid at first, second and Ombudsman stages
ASC	
Access, Information and Long Term Support	1400
Urgent Care	950
ASC Central North West London (CNWL)	500
Complex Care	1050
Commissioning Contracting and Market Management	500
Intermediate Care and Principal Occupational Therapist	250
Total	4650
CYP	
Early Help	8300
Forward Planning, Performance and Partnerships	75
Inclusion	10100
Localities	3250
Looked After Children and Permanency	11900
Total	33625
Environment and Leisure	
Commercial Services	340
Community Protection	100
Parking	110
Highways Management	400
Planning and Development	290
Regeneration	2200
Neighbourhood Management	250
Total	3690
Resident Services	
Customer Services and Assessments	6870
Customer services Operations	30
Digital Transformation	14855.97
Housing Management Customer Services	2720
Housing and Neighbourhoods	14108.62
Housing Management Property	60259.28
Housing Needs	21350
PHS	1900
Registration and Nationality	50
Revenue and Debt	1720
Total	123,862.90
Grand Total	£165,827

¹ Committee members should note that the figures cited here for 2024/2025 differ from those in appendix B – Adult Social Care Statutory Complaints Report, Appendix C - Children’s Social Care Statutory Complaints Report, and Appendix E - Housing Management Complaints Annual Report 2024/2025. This is because appendices B and C only report on statutory complaints, whereas the figures above relate to all complaints (corporate and statutory). Regarding Appendix E - the Housing Management Complaints Annual Report 2024/2025, this report did not include compensation awarded by the Housing Ombudsman 2024/2025, whereas this current report does. This is because the Housing Ombudsman published its report for 2024/2025, including Brent compensation figures, only after the Housing Management Complaints Annual Report 2024/2025 was initially published.

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Correlation between issue types and outcomes of stage one corporate and statutory complaints by department 2024-2025

Department	Complaint Withdrawn / Not pursued	Not Upheld	Partly Upheld	Rejected	Upheld	Grand Total
Adult Social Care	4	29	56	7	68	164
Access and Information - Other	1	3	12		19	35
ASC Mental Health		3	2		2	7
Care Assessor			1	1		2
Care Home / Residential Service			1			1
Care Package		3	2	2	1	8
Care Package Review - Care Home/Residential			1			1
Care Package Review - Supported Living		1	1			2
Client Invoices		2	7	1	2	12
Communication			2		3	5
Hospital Discharge		5	10	2	4	22
Lack of action		1	2			3
Legal Framework MHAA		1				1
Mental Health - Other		2				2
Occupational Therapist			2			2
Occupational Therapy Assessment		1	2		1	4
Provider Payments	1		1			2
Rehab & Reablement Service					1	1
Residential - Other		2	1			3
Review of care & support			1			1
Social worker/ Officer	2	3	6	1	33	45
Supported Living - Other		2	2			4
Supported Living / Extra Care Housing Service					1	1
Communications Insight and Innovation		2			1	3
Information Governance - Other					1	1
Transformation - Other		2				2
Community Development	1	7		1	3	12
ASB - Noise Nuisance		3		1	1	5
ASB - Noise Nuisance Enforcement		2				2
Community Safety - Other		1				1
Complaints	1					1
Noise Nuisance		1				1
Other					2	2
Customer Access		4				4
Council Tax - Enforcement Action		1				1
Council Tax - Other		1				1
Libraries – Staff Conduct		2				2
Democratic Services		1	1	2	1	5
Chief Exec Support - Missed appointments		1				1
Chief Exec Support – Other						
Complaints Service - Does not agree with the final review outcome				1		1

Department	Complaint Withdrawn / Not pursued	Not Upheld	Partly Upheld	Rejected	Upheld	Grand Total
Complaints Service - Other				1		1
Electoral Service - Communication			1			1
Electoral Service - Postal votes					1	1
Early Help and Social Care	7	60	37	10	8	123
BFFD/MASH/NRPF - Advice given	1	1	2	2		6
BFFD/MASH/NRPF - Quality of Service	1	4	6	2	3	16
BFFD/MASH/NRPF - Referral decisions		4		1		5
BFFD/MASH/NRPF - Support packages			1			1
BFFD/MASH/NRPF - Timeliness of service		2	1	1		4
Care Package		2	3		1	6
Care Planning - Administration				1		1
Care Planning - Leaving Care	1	6	3		1	11
Child Protection Conference		2	1			3
Children & Young People With Disabilities	1		1			2
Children & Young People With Disabilities - Assessments		1	1		1	3
CYP CWD - Other		3	2			5
CYP Early Help - Other		1				1
CYP Family Solutions - Other		2				2
CYP LAC & Permanency - Other		5	3	1	1	10
Direct Payments		1			1	2
East Locality - Other		2	1			3
East Locality Teams - Court Reports	1	1				2
East Locality Teams - Family Social Work		2				2
East Locality Teams - Legal		1				1
East Locality Teams - Reports & Records			1			1
East Locality Teams - Social Workers			1			1
Fostering & adoption - Social Workers			1			1
Looked After Child - Other		1				1
Looked after Children - Corporate Parenting		2	3			5
Looked after Children - LAC Finance			1			1
Looked after Children - Leaving Care		1	1			2
Looked after Children - Reports & Records		1				1
Looked after Children - Social Workers		1	1			2
Quality Assurance - Other		2				2
Safeguarding Partnership & Strategy - Other		1				1
Short Breaks / Respite		3				3
Social worker/ Officer		2				2
Transitions Service		1	2	1		4
West Locality - Other	1	1				2
West Locality Teams - Assessment			1			1
West Locality Teams - Legal				1		1
West Locality Teams - Social Workers		5				5
Young people in care - Corporate Parenting	1					1
Education, Partnerships and Strategy		18	19	1	6	44
Input form service		5	16		1	22

Department	Complaint Withdrawn / Not pursued	Not Upheld	Partly Upheld	Rejected	Upheld	Grand Total
SEND Specialist Services - Advice given		1				1
SEND Specialist Services - Assessment		1		1		2
SEND Specialist Services - Communication issues		1				1
SEND Specialist Services - Quality of service		2				2
SEND Specialist Services - Referrals		2				2
SEND Specialist Services - report for EHCP		1				1
Commissioning - 3rd party contractor issues		1				1
Commissioning - Incorrect action taken					1	1
Commissioning - Poor customer service					1	1
Commissioning - Service not provided					1	1
Commissioning - Service not up to standard			1			1
CYP Commissioning - Other			1		1	2
Inclusion Service Development - SEND Local offer		1				1
School Admissions - Child out of school		1				1
School Admissions - In Year Admissions		1			1	2
School Admissions - Quality of provision/service			1			1
School Admissions - Transfer Admissions		1				1
Finance	2				1	3
Insurance - Other	1					1
Payroll - Other	1					1
Pensions - Other					1	1
Housing Needs and Support	48	139	86	15	43	331
Application for social housing waiting list	2	10	4	2	2	20
Banding	3	3	4		2	12
Bidding		1				1
Homelessness application - family	29	63	36	2	18	148
Homelessness application - single person	7	34	20	4	9	74
Issues with Private Sector accommodation offer		3		3		6
Lettings		1				1
Offers of accommodation	1	16	8	1	5	31
Officer conduct	1		4	1	1	7
Temporary Accommodation or Bed & Breakfast	5	8	10	2	6	31
Housing Services	14	172	168	70	225	649
Anti - Social Behaviour	2	16	10		11	39
Application		1				1
Arrears		6			1	7
Asbestos Safety		2	2	1	2	7
Banding				2		2
Bedroom Entitlement				1		1
Billing			1		2	3

Department	Complaint Withdrawn / Not pursued	Not Upheld	Partly Upheld	Rejected	Upheld	Grand Total
Communal Cleaning	1	2			1	4
Communal Repair		13	13	10	31	67
Complaints about Oakray		1	1		1	3
Complaints about PS Staff		2	1		4	7
Complaints about Wates		3	7	1	7	18
Damp and/or mould		11	13	3	16	43
Decision		2				2
Electrical Safety		1	3	2	1	7
Estate Services		6	2		2	10
Gas Safety		4	4			8
Ground Maintenance		1	1		3	5
Housing Customer - Other	4	13	14	11	12	54
Housing Enforcement - Other		2		1		3
Landlord Licence - Other	1	1	1		1	4
Leasehold Enquiries		3	4	1	7	15
Lettable standard			1		1	2
Lettings process			1			1
Lift Safety					1	1
My New Home					1	1
My Personal & Household Details		1			1	2
Noise Nuisance		2				2
Other	3	12		1		16
Outstanding Repairs - Other	1	26	29	15	41	112
Overcrowding		1	1			2
Parking	1	2			1	4
Payment / Arrears		5				5
Planned Maintenance Of My Property		1	2	1	2	6
Poor Customer Service		6	3		7	16
Quality of works		1				1
Rent Refund		3	1			4
Repairs To My Property (Including Inspections)		16	42	17	64	139
Right To Buy		1	1	1	3	6
Service Failure	1	2	1	2	1	7
Sound Insulation		1	2			3
Tree Maintenance			1			1
Water Safety		2	6			8
Inclusive Regeneration and Employment		22	7		2	31
Brent Employment & Skills Service - Other					1	1
CIL (Community Infrastructure Levy) matters					1	1
Decision to take action flawed		1				1
Inadequate Investigation or Analysis		3				3
Lack of action		1				1
Department	Complaint Withdrawn / Not pursued	Not Upheld	Partly Upheld	Rejected	Upheld	Grand Total

Lack of enforcement		1				1
Other		3	1			4
Other Planning matters		2	1			3
Planning Enforcement - Inadequate Investigation		2				2
Planning Enforcement - poor customer service		3	1			4
Planning Enforcement -Decision to take Planning Enforcement Action		1				1
Planning Enforcement - Other		5				5
Planning Policy - Other			1			1
Poor Customer Service			1			1
South Kilburn Estates Regeneration			2			2
Law		5				5
Legal Team - Brent Legal Service		5				5
Organisational Assurance and Resilience		2	1			3
Insurance - Other		1				1
Insurance Claim		1	1			2
Property & Assets	1	13	1			15
Access & Facilities - Brent Civic Centre	1	6				7
Access & Facilities - FM Operational Only Buildings		1				1
Acquisitions & Disposals		2				2
Capital programme - Other		1				1
Commercial Property - Other			1			1
Commercial property management		1				1
Development management - Other		1				1
Residential Construction (new Council homes)		1				1
Public Health, Leisure & Parks			1			1
Sports - Customers / Users			1			1
Public Realm	13	73	32	8	22	148
Allotments	1					1
Bins - Damaged / Missing / Etc		1			1	2
Bins - missed		1				1
Bins - Missed Collection			1			1
Brent Connects		1				1
Cleaning schedule			1			1
Communal Cleaning		2			1	3
Community Group		1				1
Contact Issues		1				1
Environmental enforcement team - Waste & Litter (Domestic)		1				1
Environmental enforcement team – other		1				1
Environmental Health Query		1				1
Estate Parking		1			1	2
Fly tipping	1					1
Food Safety Query			1			1

Department	Complaint Withdrawn / Not pursued	Not Upheld	Partly Upheld	Rejected	Upheld	Grand Total
Ground Maintenance	1					1
Grounds Maintenance		2	2		1	5
Health and Safety concern			1			1
Highways Management - Blocked Drains, Leaks & Floods			1			1
Highways Management - Defects (Other)			1		1	2
Highways Management - Defects (Pavements)		2	1			3
Highways Management - Defects (Road Markings)		1				1
Highways Management - Kerbs (Drop Kerb Application)		1	2		1	4
Highways Management - Kerbs (Kerbs & Pavements)			1			1
Highways Management - Road Closures/Diversions		1				1
Highways Management - Street Lighting	1					1
Highways Management - Traffic Control		1				1
HS&P - Bailiff Action		1				1
HS&P - bay suspension		1				1
HS&P - Buses - Other	1					1
HS&P - Disabled Bay		2			1	3
HS&P - Enforcement (Tow Away)		1			1	2
HS&P - Other		2	1		2	5
HS&P - Parking Enforcement	2	24	4	7	7	44
HS&P - Permits	1	10	5		3	19
HS&P - poor customer service			1			1
HS&P - Signage & Information			1			1
HS&P- School Travel Schemes		1				1
Incident involving vehicle			1			1
Litter		2				2
NHM Multiple Issues		3	1	1		5
Parks - allotments holders day to day issues		1	1			2
Parks - Event Management		1				1
Parks - Management Issues		1	1			2
Parks - Other		2				2
Parks - Playgrounds & Play Areas	1					1
Pest Control - Other			1			1
Pest Control - Delay / Failure to respond	1					1
Public Realm - other		1				1
Quality / lack of communication / contact			1			1
Refuse service					1	1
Staff attitude/ behaviour			1		1	2
Street Cleaning	2					2
Trading Standards Query	1		1			2
Resident Services	6	255	75	22	70	428
Accessing My Account					1	1
Appointee + Deputyship		1				1

Department	Complaint Withdrawn / Not pursued	Not Upheld	Partly Upheld	Rejected	Upheld	Grand Total
Benefits - Delay In Assessment		1		1	2	4
Benefits - Staff Attitude		1				1
Benefits Assessment		2				2
Births, Marriages & Deaths		1			1	2
Blue Badge - Assessment	1		1		2	4
Blue Badge - Other					1	1
Business Rates - Account		3				3
Business Rates - Billings / Liability		1				1
Business Rates - Other		1				1
Cemetries - Graves	1				1	2
Cemetries - Ground Maintenance					1	1
Cemetries - Incorrect action taken/service provided	1					1
Cemetries - poor customer experience			1			1
Client Affairs - Assessments		1	1			2
Contact Centre - Incorrect information / knowledge		1	2		1	4
Contact Centre - Staff Attitude	1		1			2
Contact Centre Call Waiting Times			1			1
Council Tax - Enforcement Action		74	24	2	7	107
Council Tax - Banding		2				2
Council Tax - Discounts/Exemptions	1	17	9		8	35
Council Tax - Other		91	16	10	7	124
Council Tax - Payments, Refunds & Direct Debits		27	1		4	32
Council Tax - Poor Customer Experience		3	1		8	12
Customer Access Contact Centre - Other					1	1
Customer Access Operations - Other	1	2			3	6
Customer Service Centre - Long Waiting Times					1	1
Debt Recovery - Account Enquiries		1			1	2
Debt Recovery - Customer Service			1			1
Debt Recovery - Invoicing / Billing			3			3
Debt Recovery - Other		1				1
Debt Recovery - Payments		1			1	2
Debt Recovery - Recovery		3	1		1	5
Freedom Pass - Assessment			1			1
Housing Benefits - Other		2	1	5	1	9
Hubs - Poor Customer Service		2	1			3
Independent Travel - Other		1	1		1	3
Libraries – Availability of Stock					1	1
Libraries – Environment		2		1		3
Libraries - Facilities and Furniture					2	2
Libraries – IT equipment					1	1
Libraries - Other		2	1	1	3	7
Libraries - Poor Customer Service		3	1	1	2	7
Libraries – Poor Event Delivery			1			1
Libraries – Poor website navigation					1	1
Libraries – Staff Conduct			1		1	2

Libraries – Toilet Facilities					1	1
Local Welfare Assistance - DHP's		2				2
Local Welfare Assistance - Other		3	1	1	1	6
Mortuary - Incorrect action taken/service provided		1	1			2
Overpayments - Customer Service					1	1
Overpayments - Other			1			1
Overpayments - Recovery			1		1	2
Poor Customer Service		1				1
Third Party Issue		1			1	2
Strategic Housing	2	1	4		3	10
Hyde Housing			2			2
Notting Hill Genesis					1	1
Other			2		1	3
Other (smaller RP)	1	1				2
Peabody	1					1
SNG					1	1

Appendix H - Learning and improvements arising from complaints – summary and selected examples 2024/25

Complaint investigations provide learning and improvement opportunities across all areas of the Council. Section 4.20 of the complaints annual report for 2024/25 (**appendix A**) includes detailed information on learning points arising from complaints. Service improvements arising from complaints are also detailed in section 3.0.58 of the annual housing complaints report (**appendix E**), and section 10 of the annual CYP complaint report (**appendix C**).

The further examples below from second stage corporate complaint investigations during 2024/25 have been selected to indicate the range of learning and improvements highlighted to various areas of the Council.

Housing and Resident Services

Complaints received by Housing and Resident Services most frequently related to homelessness applications and accommodation, repairs (including outstanding repairs, damp and mould) and Council Tax enforcement activity. Case descriptions commonly described delays, residents not receiving clear updates, and concerns about decisions or actions not being explained clearly. Learning and improvements include ensuring statutory processes are followed consistently, communication is timely and accessible, and there is clear ownership of next steps and timescales.

One example is a Housing Needs Service complainant became confused about whether he was eligible to bid for social housing because two Locata accounts remained open. In fact, the complainant should not have been able to bid on Locata at all because he and his family had been satisfactorily rehoused through a homeless application. The complaint highlighted the need for Housing Needs and Support Service officers to ensure all redundant Locata accounts are closed down when a homeless application is suitably rehoused.

Service-led improvements highlighted include:

Housing Needs officers should introduce a simple “closure checklist” that must be completed before any homelessness case can be closed: the duty end decision letter has been issued to the applicant, review rights are included, key evidence/notes are on file, and the applicant has been told the outcome and next steps.

Housing Management officers are also reminded not to reschedule appointment windows on CRM for subcontracted works, as subcontractors manage their own diaries and this leads to missed appointments.

The Council Tax team will ensure the Capacity Grid has an updated list of exemptions at the start of every year.

Neighbourhoods and Regeneration

Complaints received by Neighbourhoods and Regeneration most frequently related to parking enforcement and permits, with some complaints also relating to planning enforcement. Case descriptions often highlighted disagreement with decisions, concerns about whether evidence had been properly considered, and frustration with the clarity and consistency of communications. Learning and improvements include ensuring decisions are clearly

explained, evidence is properly logged and reviewed, and residents receive timely, accurate updates on appeal and investigation processes.

One example is a complainant escalated the troubles they were facing with how their vehicle crossing (dropped kerb) application was being handled, describing repeated contact with multiple officers, uncertainty about what information/actions were still required, and frustration with the pace of progress; the case description points to the importance of a single, clear route through the process and regular updates so applicants are not left guessing what happens next.

Children & Young People

Complaints received by Children & Young People most frequently related to education/service requests (input forms), front door/safeguarding and quality of service, and care planning/leaving care. Case descriptions commonly referenced concerns about timeliness, follow-up, the quality of engagement with families and young people, and clarity around decisions and next steps. Learning and improvements include strengthening communication standards, improving oversight of follow-up actions, and ensuring families and young people understand what will happen next and by when.

One example is a complaint about serious failings in a Child Protection Plan (CPP) process, where the complainant said they were not provided the final report before the court hearing despite chasing and that delays/changes were not communicated clearly; the case description highlights the importance of timely information sharing and transparent process management in vulnerable safeguarding cases.

Service-led improvements highlighted include School Admissions implementing weekly monitoring of the School Admissions mailbox to identify urgent messages, complaints or appeals that have been received but not processed.

Community Health and Wellbeing

Complaints received by Community Health and Wellbeing most frequently related to access and information, social worker/officer involvement, and hospital discharge. Case descriptions frequently described residents not being kept updated, difficulty getting timely contact, and concerns about follow-up actions. Learning and improvements include ensuring proactive communication, clear recording of actions, timely responses to safeguarding and care-related concerns, and robust follow-up where risk is identified.

One example is a complaint linked to a dispute about provider payments / reduced hours, where the case description centres on a highly vulnerable client (described as an older adult affected by polio, a wheelchair user with advanced dementia) and the complainant challenged an internal account of events and the decision-making; the case description shows why records need to be precise and why any changes to support must be clearly explained to those involved.

Finance and Resources

Complaints received by Finance and Resources were lower in volume but included facilities/access issues, insurance claims, and pensions/payroll administration. Case descriptions often focused on communication delays, unclear ownership, and the impact of errors or lack of response. Learning and improvements include ensuring clear points of contact, timely acknowledgements and updates, and quality assurance checks where errors could cause financial or personal distress.

One example is a complaint about an insurance claim appeal where the complainant described repeated chasers with no acknowledgement or update despite providing evidence, highlighting the need for clear ownership, timely responses, and transparent timescales in claim handling.

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 <p>Brent</p>	<p align="center">Resources and Public Realm Scrutiny Committee 24 February 2026</p>
	<p align="center">Report from the Deputy Director, Democratic and Corporate Governance</p>
<p>Scrutiny Recommendations Tracker</p>	

Wards Affected:	All
Key or Non-Key Decision:	Non-Key Decision
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:	Appendix A - Scrutiny Recommendations Tracker
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	<p>Jason Sigba Strategy Lead – Scrutiny, Democratic & Corporate Governance Jason.Sigba@brent.gov.uk</p> <p>Amira Nassr Deputy Director, Democratic & Corporate Governance, Finance & Resources Amira.Nassr@brent.gov.uk</p>

1.0 Executive Summary

1.1 This report presents the Scrutiny Recommendations Tracker to the Resources and Public Realm Scrutiny Committee for consideration.

2.0 Recommendation(s)

2.1 That the progress of any previous recommendations, suggestions for improvement, and information requests of the committee be noted (Appendix A).

3.0 Detail

3.1 Contribution to Borough Plan Priorities & Strategic Context

3.1.1 Borough Plan 2023-2027 – all strategic priorities.

3.2 Background

3.2.1 In accordance with Part 4 of the Brent Council Constitution (Standing Orders of Committees), Brent Council scrutiny committees may make recommendations to the Full Council or the Cabinet with respect to any functions which are the responsibility of the Executive, or of any functions which are not the responsibility of the Executive, or on matters which affect the borough or its inhabitants.

3.2.2 The Resources and Public Realm Scrutiny Committee may not make executive decisions. Scrutiny recommendations therefore require consideration and decision by the appropriate decision maker; the Cabinet or Full Council for policy and budgetary decisions.

3.2.3 The Scrutiny Recommendations Tracker provides a summary of any scrutiny recommendations made to Cabinet/Full Council/external stakeholders and implementation progress. It also includes suggestions for improvement and information requests to council departments/external stakeholders, as captured in the minutes of the committee meetings.

3.2.4 Recommendations, suggestions for improvement, and information requests are removed from the tracker when they have either been actioned or rejected.

4.0 Procedure for Recommendations from Scrutiny Committees

4.1 Where scrutiny committees make recommendations to the Cabinet, these will be referred to the Cabinet (and/or relevant cabinet member/s) requesting an Executive Response. If relevant, the item will be published on the Council's Forward Plan.

4.2 Regarding recommendations to Full Council (e.g. in the case of policy and budgetary decisions), the same process will be followed, where a report containing the scrutiny recommendations will then be forwarded to Full Council alongside the Cabinet's responses to those recommendations.

4.3 Where scrutiny committees have powers under their terms of reference to make reports or recommendations to external decision makers (e.g. NHS bodies), the relevant external decision maker shall be notified in writing, providing them with a copy of the respective Committee's report and recommendations, and requesting a response.

4.4 Once responses are received, they will be added to the Recommendations Tracker for review and consideration.

5.0 Stakeholder and ward member consultation and engagement

5.1 None for the purposes of this report.

6.0 Financial Considerations

6.1 There are no financial considerations for the purposes of this report.

7.0 Legal Considerations

7.1 Section 9F, Part 1A of the Local Government Act 2000, *Overview and scrutiny committees: functions*, requires that Executive arrangements by a local authority must ensure that its overview and scrutiny committees have the power to make reports or recommendations to the authority or the executive with respect to the discharge of any functions which are or are not the responsibility of the executive, or on matters which affect the Authority's area or the inhabitants of that area.

7.2 Section 9FE, *Duty of authority or executive to respond to overview and scrutiny committee*, requires that the authority or executive;-
(a) consider the report or recommendations,
(b) respond to the overview and scrutiny committee indicating what (if any) action the authority, or the executive, proposes to take,
(c) if the overview and scrutiny committee has published the report or recommendations, publish the response, within two months beginning with the date on which the authority or executive received the report or recommendations.

8.0 Equity, Diversity & Inclusion (EDI) Considerations

8.1 There are no EDI considerations for the purposes of this report.

9.0 Climate Change and Environmental Considerations

9.1 There are no climate change and environmental considerations for the purposes of this report.

10.0 Communication Considerations

10.1 There are no communication considerations for the purposes of this report.

Report sign off:

Amira Nassr

Deputy Director, Democratic and Corporate Governance

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**Resources and Public Realm Scrutiny Committee (RPRSC)
Recommendations Tracker 2025/26**

The Recommendations Tracker is a standing item on committee agendas, and documents the progress of scrutiny recommendations, suggestions for improvement, and information requests made by the Resources and Public Realm Scrutiny Committee at its public meetings and as part of task and finish group reviews. Scrutiny recommendations, suggestions for improvement, and information requests will not be removed from the tracker until full responses have been provided to the committee by either the Cabinet, Full Council, council departments, and/or external partners.

Recommendations to Cabinet

Subject	Scrutiny Recommendation	Cabinet Member, Lead Officer, and Department	Executive Response
21 Jan 2026 – Anti-Social Behaviour (ASB) in Brent	Develop a stand-alone Anti-Social Behaviour (ASB) strategy structured around a clear three-pillar approach encompassing early interventions, formal enforcement and criminal justice interventions, and financial, housing, and social care-related interventions.	Cllr Ishma Moeen – Cabinet Member for Community Safety and Cohesion Nigel Chapman – Corporate Director, Children, Young People & Community Development	<i>Response to be provided by 19 March 2026.</i>
	Strengthen planning policies relating to the location, concentration, design and management of Houses in Multiple Occupation (HMOs), enabling planning decisions to better consider and mitigate the risk of anti-social behaviour.	Cllr Teo Benea – Cabinet Member for Regeneration, Planning & Property Jehan Weerasinghe – Corporate Director, Neighbourhoods & Regeneration	<i>Response to be provided by 19 March 2026.</i>

Suggestions for improvement from RPRSC to Council departments/partners

Meeting date and agenda item	Suggestion for improvement	Council Department/External Partner	Response / Status
25 Feb 2025 - Commissioning, Procurement, Community Wealth-Building, and Social Value	Revise the official council report template to include dedicated sections for Community Wealth Building and Social Value Considerations, ensuring these factors are assessed and reported in all council reports where relevant.	Amira Nassr– Deputy Director, Democratic & Corporate Governance, Finance & Resources	<p>Response received on 11/06/2025:</p> <p>This will be revisited in April 2026 once the procurement and social value policies have been formally adopted.</p> <p><i>Awaiting updated response.</i></p>
23 April 2025 – Build Quality in Brent	Conduct a survey to identify which council-owned buildings may fall within the scope of the Building Safety Act 2022 and/or the Defective Premises Act 1972 in relation to relevant defects, and assess whether there is potential for legal recourse.	Tanveer Ghani – Director, Property & Assets, Neighbourhoods & Regeneration	<p>Response received on 07/07/25:</p> <p>Officers have identified two projects (Housing and Education) that may fall within the scope of the Building Safety Act 2022 and/or the Defective Premises Act 1972. Work is being undertaken to assess if/where they may be potential for legal recourse.</p> <p>A further update will be provided by 9 January 2026.</p> <p>Updated response received on 08/12/25:</p> <p>A further update will be provided by 19 March 2026.</p>

	Undertake a sampling review to assess design changes from the planning stage through to practical completion, and determine whether these changes have impacted build quality.	Tanveer Ghani – Director, Property & Assets, Neighbourhoods & Regeneration	<p>Response received on 07/07/25:</p> <p>Officers propose to undertake a sampling of three projects, one from each the following areas:</p> <ul style="list-style-type: none"> • Education • Housing • Regeneration <p>A further update will be provided by 9 January 2026.</p> <p>Updated response received on 08/12/25:</p> <p>A further update will be provided by 19 March 2026.</p>
4 November 2025 – VCSE in Brent	Integrate employment and climate goals into the forthcoming VCSE capacity building offer.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	<p>Response received on 04/12/25:</p> <p>The suggestion is noted, and will be further considered through the scoping and development of the future VCSE capacity building service in conjunction with the cross-sector steering group that is leading on it; joint action planning with the VCSE sector following the VCSE Summit in September 2025 and the support provided through a range of other initiatives including the social value policy.</p> <p><i>Awaiting updated response.</i></p>
	Implement a strengthened, comprehensive, and transparent monitoring framework for the forthcoming VCSE Capacity-Building Contract, drawing on lessons learned from existing practices.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	<p>Response received on 04/12/25:</p> <p>The suggestion is noted, and will be further considered through the scoping and development of the future VCSE capacity building service in conjunction with the cross-sector steering group that is leading on it; joint action planning with the VCSE sector following the VCSE Summit in September 2025 and the support provided through a range of other initiatives including the social value policy.</p> <p><i>Awaiting updated response.</i></p>

	Leverage the forthcoming VCSE capacity-building contract to strengthen local VCSE organisations' ability to engage effectively in council-led social value negotiations and procurement processes.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	<p>Response received on 04/12/25:</p> <p>The suggestion is noted, and will be further considered through the scoping and development of the future VCSE capacity building service in conjunction with the cross-sector steering group that is leading on it; joint action planning with the VCSE sector following the VCSE Summit in September 2025 and the support provided through a range of other initiatives including the social value policy.</p> <p><i>Awaiting updated response.</i></p>
4 November 2025 – Social Value: Draft Policy and Whole-Council Approach	Submit an annual report on the forthcoming Social Value Policy for ongoing scrutiny, presenting detailed evidence of social value commitments made and outcomes achieved.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	<i>Awaiting response.</i>
4 November 2025 – Procurement Improvement Programme and Emerging Procurement Strategy	Continue strengthening support for SMEs by reducing barriers and streamlining council procurement processes, ensuring easier access to contracts and opportunities.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	<i>Awaiting response.</i>
	Adopt a tiered definition of 'local' in procurement, prioritising: <ul style="list-style-type: none"> • Suppliers that operate and pay business rates within the borough, while ensuring value for money; followed by • Suppliers that deliver significant social and economic benefits to Brent, such as employing 	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	<i>Awaiting response.</i>

	a substantial number of local residents		
	Explore introducing a threshold for certain higher-value contracts to ensure that businesses the Council engage with pay the London Living Wage.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	<p>Response received on 04/12/25:</p> <p>The suggestion is noted. This is already under consideration in the development of the draft Procurement Strategy and will be addressed through its final drafting and the development of supporting guidance and activity to support its implementation.</p> <p><i>Awaiting updated response.</i></p>
	Require all businesses the Council regardless of contact value to recognise trade unions as a standard condition of engagement, where possible.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	<p>Response received on 04/12/25:</p> <p>The suggestion is noted. This is already under consideration in the development of the draft Procurement Strategy and will be addressed through its final drafting and the development of supporting guidance and activity to support its implementation.</p> <p><i>Awaiting updated response.</i></p>
21 Jan 2026 – Anti-Social Behaviour (ASB) in Brent	Strengthen liaison and information-sharing between anti-social behaviour, housing and neighbourhoods, and licensing enforcement teams, ensuring that relevant intelligence on landlord management history is consistently considered when applying licensing criteria, and that any concerns are appropriately flagged for continued oversight where licences are granted.	<p>Kibibi Octave – Director, Community Development, Children, Young People & Community Development</p> <p>Spencer Randolph – Director, Housing Services, Residents & Housing Services</p>	<i>Response to be provided by 19 March 2026.</i>

<p>Review the current prioritisation and resourcing of licensing enforcement to ensure it is sufficient to address the scale and impact of anti-social behaviour associated with poor property management.</p>	<p>Spencer Randolph – Director, Housing Services, Residents & Housing Services</p>	<p><i>Response to be provided by 19 March 2026.</i></p>
<p>Improve the consistency and equity of anti-social behaviour enforcement across the borough, ensuring that Public Spaces Protection Order (PSPO) and related enforcement powers are applied fairly and proportionately, and that residents receive a comparable standard of service regardless of location.</p>	<p>Chris Whyte – Director, Public Realm, Neighbourhoods & Regeneration</p>	<p><i>Response to be provided by 19 March 2026.</i></p>
<p>Subject to evaluation of impact and value for money, explore and pursue all appropriate funding options, including Neighbourhood Community Infrastructure Levy (NCIL), where available, to sustain out-of-hours ASB enforcement activity beyond the initial 12-month NCIL-funded pilot period.</p>	<p>Kibibi Octave – Director, Community Development, Children, Young People & Community Development</p>	<p><i>Response to be provided by 19 March 2026.</i></p>
<p>Actively encourage strategic multi-agency ASB partnerships (e.g. Community Multi-Agency Risk Assessment Conference (CMARAC), Borough Joint Action Group (BJAG)) to strengthen engagement with local representatives, including councillors and ward panel chairs, to improve the flow of local intelligence and insight into</p>	<p>Kibibi Octave – Director, Community Development, Children, Young People & Community Development</p>	<p><i>Response to be provided by 19 March 2026.</i></p>

	<p>emerging ASB issues and community impacts.</p>		
	<p>Ensure future reports to the Committee clearly set out the strategic context for the topic under consideration and are supported by sufficient background information, narrative explanation of figures and trends (including benchmarking where relevant), and insight into resident experience and satisfaction. As an initial step, include in the upcoming annual report the following information, where possible:</p> <ul style="list-style-type: none"> • Assessment of the effectiveness of current anti-social behaviour interventions, drawing on available data and evidence to support understanding of what is working and where improvement may be needed. • Clear explanation of police and council community safety remits, including Safer Neighbourhood Team and ward panel activity as police functions, and how these link to and inform the work of the Safer Brent Partnership Board. • Analysis of Fixed Penalty Notices related to ASB, including offence type, 	<p>Kibibi Octave – Director, Community Development, Children, Young People & Community Development</p>	<p><i>Response to be provided by 19 March 2026.</i></p>

	<p>enforcement outcomes, repeat enforcement, geographic distribution, time-based patterns, relevant demographic characteristics, and evidence of impact on anti-social behaviour.</p> <ul style="list-style-type: none">• Analysis of Fixed Penalty Notice income recovery, including payment rates, cases escalated to court, prosecution outcomes, and recovery rates for unpaid notices, with contextual information distinguishing, where available, between non-payment due to inability to pay and deliberate non-compliance.• Analysis of PSPOs, including geographic patterns of use, enforcement outcomes, repeat breaches, evidence of impact, relevant demographic trends, and community feedback.• Benchmarking of ASB case review outcomes against comparable authorities or relevant external benchmarks, where available.		
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Information requests from RPRSC to Council departments/partners

Meeting date and agenda item	Information request	Council Department/External Partner	Response / Status
25 Feb 2025 - Commissioning, Procurement, Community Wealth-Building, and Social Value	Provide a detailed breakdown of commissioned services income received over the last three years, categorised by organisation type.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	<i>Awaiting response.</i>
	Provide a detailed breakdown of funding allocated to externally commissioned services, distinguishing between organisation types—private companies (small and medium-sized enterprises (SMEs) and large enterprises/corporations), VCS organisations, and social enterprises—while also indicating whether each organisation is local or non-local.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	<i>Awaiting response.</i>
23 April 2025 – Build Quality in Brent	Share examples that demonstrate how feedback on build quality issues has led to tangible improvements in design and processes, helping to enhance build quality in subsequent projects or schemes.	Tanveer Ghani – Director, Property & Assets, Neighbourhoods & Regeneration	<p>Response received on 07/07/25:</p> <p>Officers will collate examples from different schemes where we have either self-delivered or acquired from the open market and share with RPRSC to demonstrate how feedback / lessons learned have been incorporated into future projects/schemes.</p> <p>A further update will be provided by 9 January 2026.</p> <p>Updated response received on 08/12/25:</p> <p>A further update will be provided by 19 March 2026.</p>

4 November 2025 – VCSE in Brent	Outline the joint work of Strategic Commissioning, Capacity Building and Engagement, and Property and Assets teams to support VCS organisations renting council-owned assets in sustaining their premises and addressing affordability concerns.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	<i>Awaiting response.</i>
	Provide a detailed analysis of the strengths, challenges, and opportunities within current council commissioning arrangements.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	<i>Awaiting response.</i>
	Provide an overview of all VCS-commissioned services across the council, including details on scope, objectives, key outcomes, funding levels, contract duration, and how these services align with Borough Plan priorities.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	<i>Awaiting response.</i>
	Provide detailed information on the current Voluntary Community Infrastructure Support (VCIS) contract, including its scope, objectives, expected outcomes, funding levels, duration, performance measures, monitoring arrangements, and evidence of value and impact delivered to the VCS.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	<i>Awaiting response.</i>

	<p>Provide benchmarking data on VCSE capacity building contracts commissioned by other London authorities, covering:</p> <ul style="list-style-type: none"> • Value and scope • Duration • Priority themes • Delivery models (e.g., direct delivery vs. commissioned providers; single provider vs. consortium) • Performance and impact measures. 	<p>Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy</p>	<p><i>Awaiting response.</i></p>
	<p>Provide information on the anticipated value and scope of the forthcoming VCSE capacity building contract.</p>	<p>Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy</p>	<p><i>Awaiting response.</i></p>
	<p>Provide an update on the Market Rent Reduction Pilot for the three new lettings (Harmony Kitchen, Brent Civic Centre, Roy Smith House, and Picture Palace), detailing the communities each organisation will support, the agreed measures to deliver community value, and how these commitments will be monitored.</p>	<p>Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy</p>	<p><i>Awaiting response.</i></p>

	Provide a detailed overview of VCS grant programmes, focusing on grant operations and outcomes. This should include eligibility criteria, key dates (such as application windows, decision timelines, and funding start/end dates), a summary of awards over the past three years, and the time taken to disburse funds to recipient organisations, highlighting any significant delays.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	<i>Awaiting response.</i>
4 November 2025 – Social Value: Draft Policy and Whole-Council Approach	Provide a sample of data from higher-value procurements since April 2020 (following implementation of the current strategy), detailing: <ul style="list-style-type: none"> • Social value delivered versus committed; • Performance against associated KPIs; • Where relevant, financial implications for the Social Value Fund where commitments were unmet; and • The resulting impact. 	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	<i>Awaiting response.</i>
	Provide case studies illustrating both successful and underperforming delivery of social value commitments under current contracts. Each case should outline: <ul style="list-style-type: none"> • The social value commitments made; • Actual delivery achieved; 	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	<i>Awaiting response.</i>

	<ul style="list-style-type: none"> • Reasons for any variance; and • Lessons learned to inform the forthcoming Social Value Policy. 		
	Provide further detail on how transparency and accountability will be maintained in measuring social value across services, given the shift from a purely quantitative approach to a mixed model that combines qualitative and quantitative outcomes.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	<i>Awaiting response.</i>
21 Jan 2026 – Anti-Social Behaviour (ASB) in Brent	Provide an update on the ‘Dockless Cycle Hire Bay’ consultation undertaken in Summer 2025 as part of the work to identify suitable locations for Lime bike parking bays across the borough, including engagement with residents and ward councillors and any emerging outcomes.	Chris Whyte – Director, Public Realm, Neighbourhoods & Regeneration	<i>Response to be provided by 19 March 2026.</i>

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	<p align="center">Resources and Public Realm Scrutiny Committee 24 February 2026</p>
	<p align="center">Report from the Deputy Director, Democratic and Corporate Governance</p>
<p>Resources and Public Realm Scrutiny Committee Work Programme 2025/26</p>	

Wards Affected:	All
Key or Non-Key Decision:	Not Applicable
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:	Appendix A – Resources and Public Realm Scrutiny Committee Work Programme 2025/26
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	<p>Jason Sigba Strategy Lead – Scrutiny, Democratic & Corporate Governance Jason.Sigba@brent.gov.uk</p> <p>Amira Nassr Deputy Director, Democratic & Corporate Governance, Finance & Resources Amira.Nassr@brent.gov.uk</p>

1.0 Executive Summary

1.1 This report confirms that no changes have been made to the Resources and Public Realm Scrutiny Committee’s work programme.

2.0 Recommendation(s)

2.1 That committee members note the contents of this report.

3.0 Detail

3.1 Contribution to Borough Plan Priorities & Strategic Context

3.1.1 Borough Plan 2023-2027 – all strategic priorities.

3.2 Background

3.2.1 The work programme outlines the items which the Resources and Public Realm Scrutiny Committee will consider during the municipal year.

3.2.2 It is intended to be a flexible, living document that can adapt and change according to the needs of the Committee.

3.2.3 There are no updates to note for the purposes of this report.

4.0 Stakeholder and ward member consultation and engagement

4.1 Ward members are regularly informed about the Committee's work programme in the Chair's report to Full Council. There is ongoing consultation with other relevant stakeholders.

5.0 Financial Considerations

5.1 There are no financial considerations arising from this report. However, budget and financial implications are addressed in the 'Financial Considerations' section of any reports to the Committee, requested as part of its work programme.

6.0 Legal Considerations

6.1 There are no legal considerations arising from this report. However, legal implications are addressed in the 'Legal Considerations' section of any reports to the Committee, requested as part of its work programme.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

7.1 There are no EDI considerations for the purposes of this report. However, EDI implications are addressed in the 'EDI Considerations' section of any reports to the Committee, requested as part of its work programme.

8.0 Climate Change and Environmental Considerations

8.1 There are no climate change and environmental considerations for the purposes of this report. However, climate change and environmental implications are addressed in the 'Climate Change and Environmental Considerations' section of any reports to the Committee, requested as part of its work programme.

9.0 Communication Considerations

9.1 There are no communication considerations for the purposes of this report. However, communication implications are addressed in the 'Communication Considerations' section of any reports to the Committee, requested as part of its work programme.

Report sign off:

Amira Nassr

Deputy Director, Democratic and Corporate Governance

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Appendix A

Resources and Public Realm Scrutiny Committee Work Programme 2025/26

16 July 2025

Agenda Item	Cabinet Member/Non-Executive Member	Corporate Director	External Organisations
Committee Work Programme 2025/26	Cllr Rita Conneely, Chair of Resources and Public Realm Committee	Minesh Patel, Corporate Director – Finance and Resources	
Recycling in Brent	Cllr Krupa Sheth, Cabinet Member for Public Realm and Enforcement	Alice Lester, Corporate Director – Neighbourhoods and Regeneration	
Budget 2025/26 Update: Medium Term Financial Outlook	Cllr Mili Patel, Deputy Leader and Cabinet Member for Finance and Resources	Minesh Patel, Corporate Director – Finance and Resources	

2 September 2025

Agenda Item	Cabinet Member/Non-Executive Member	Corporate Director	External Organisations
Establishment of Budget Scrutiny Task Group	Cllr Rita Conneely, Chair of Resources and Public Realm Committee	Minesh Patel, Corporate Director – Finance and Resources	
Local Plan Review	Cllr Teo Benea, Cabinet Member for Regeneration, Planning and Property	Alice Lester, Corporate Director – Neighbourhoods and Regeneration	

4 November 2025

Agenda Item	Cabinet Member/Non-Executive Member	Corporate Director	External Organisations
Budget 2025/26: In-Year Monitoring Update	Cllr Mili Patel, Deputy Leader and Cabinet Member for Finance and Resources	Minesh Patel, Corporate Director – Finance and Resources	
Social Value Policy	Cllr Jake Rubin, Cabinet Member for Climate Action and Community Power	Rachel Crossley, Corporate Director – Service Reform and Strategy	
Procurement Strategy	Cllr Jake Rubin, Cabinet Member for Climate Action and Community Power	Rachel Crossley, Corporate Director – Service Reform and Strategy	
Funding and Support for the Voluntary and Community Sector (VCS)	Cllr Jake Rubin, Cabinet Member for Climate Action and Community Power	Rachel Crossley, Corporate Director – Service Reform and Strategy	

21 January 2026

Agenda Item	Cabinet Member/Non-Executive Member	Corporate Director	External Organisations
Approach to tackling ASB across Brent	Cllr Ishma Moeen, Cabinet Member for Community Safety and Cohesion	Nigel Chapman, Corporate Director – Children, Young People and Community Development	
Budget Scrutiny Task Group Findings	Cllr Rita Conneely, Chair of Resources and Public Realm Committee	Minesh Patel, Corporate Director – Finance and Resources	

24 February 2026

Agenda Item	Cabinet Member/Non-Executive Member	Corporate Director	External Organisations
Budget 2025/26: In-Year Monitoring Update	Cllr Mili Patel, Deputy Leader and Cabinet Member for Finance and Resources	Minesh Patel, Corporate Director – Finance and Resources	
Complaints Annual Report 2024/25	Cllr Mili Patel, Deputy Leader and Cabinet Member for Finance and Resources	Minesh Patel, Corporate Director – Finance and Resources	
Littering and Fly Tipping	Cllr Krupa Sheth, Cabinet Member for Public Realm and Enforcement	Jehan Weerasinghe, Corporate Director – Neighbourhoods and Regeneration	

2 April 2026

Agenda Item	Cabinet Member/Non-Executive Member	Corporate Director	External Organisations
Allotments Management	Cllr Krupa Sheth, Cabinet Member for Public Realm and Enforcement	Jehan Weerasinghe, Corporate Director – Neighbourhoods and Regeneration	
Safer Brent Partnership Report 2025/26	Cllr Ishma Moeen, Cabinet Member for Community Safety and Cohesion	Nigel Chapman, Corporate Director – Children, Young People and Community Development	Metropolitan Police
Community Engagement and Consultation	Cllr Ishma Moeen, Cabinet Member for Community Safety and Cohesion	Rachel Crossley, Corporate Director – Service Reform and Strategy	

Kerbside Management Scrutiny Task
Group Findings

Cllr Anthony Molloy, Member of Resources and
Public Realm Committee and Task Group Chair

Minesh Patel, Corporate
Director – Finance and
Resources