



**MINUTES OF THE AUDIT AND STANDARDS ADVISORY COMMITTEE
HELD IN THE CONFERENCE HALL, BRENT CIVIC CENTRE ON TUESDAY 24 MARCH
2026 AT 6.00 PM**

PRESENT: David Ewart (Independent Chair), Councillor Chan (Vice-Chair) and Councillors Choudry, Gbajumo, Long, Molloy and L. Smith (present online).

Independent Co-opted Members: Sebastian Evans, Rhys Jarvis (present online) and Stephen Ross.

Also Present: Andrew Hudson (Chair of i4B and First Wave Housing), Natoya Vincent (Strategy and Delivery Manager, i4B and First Wave Housing), Sheena Phillips (Grant Thornton – External Auditor) and Louis W. Niven (Grant Thornton – External Auditor).

1. Apologies for absence and clarification of alternate members

Apologies for absence were received from Councillor J. Patel, Marsha Henry (Director of Law), Bianca Robinson (Principal Lawyer, Constitution Governance and Finance, Brent Council), Rhodri Rowlands (Director of Strategic Commissioning, Capacity Building and Engagement, Brent Council) and Councillor Rubin (Cabinet Member for Climate Action and Community Power).

2. Declarations of Interest

David Ewart (Independent Chair) declared a personal interest as a member of CIPFA.

Councillor Long declared a personal interest in relation to Item 8 – Performance and Management of i4B Holdings Ltd and First Wave Housing Ltd, given that she was currently in the process of selling her property to i4B and confirmed that she would withdraw from any vote on that item.

No other declarations of interest were made by members during the meeting.

3. Minutes of the previous meeting & Action Log

It was **RESOLVED** that the minutes of the previous meeting of the Committee held on Tuesday 3 February 2026 be approved as a correct record.

Members noted the update provided in relation to the Action Log of issues identified at previous meetings, which it was noted would remain subject to ongoing review by the Chair and Vice-Chair.

4. Matters arising (if any)

None raised.

5. **Deputations (if any)**

There were no deputations considered at the meeting.

6. **Order of Business**

The Chair advised that he would be taking agenda item 12, External Audit Update Report, first, in order to bring in the external auditors, Grant Thornton to present the item and answer questions. The remainder of the agenda would then follow in the original order.

7. **External Audit Update Report**

Sheena Phillips (Senior Audit Manager, Grant Thornton) was welcomed to present the update on progress with the external audit of the 2025-26 accounts. In presenting the report, Sheena Phillips highlighted the following key points:

- On behalf of Grant Thornton, she passed thanks on to the relevant teams involved in working to get the 2024-25 audit published. The 2024–25 financial statements audit had been completed on 25 February 2026, following the presentation of the Audit Findings Report at the 3 February 2026 meeting of the Committee. On issuing the 2024–25 audit opinion, Grant Thornton had also finalised the Audit Findings Report and the Auditor's Annual Report, with the final documents included in the papers for the current meeting.
- In relation to Value for Money, work had commenced on the 2025–26 report. Grant Thornton had reported two significant weaknesses in the 2024–25 Auditor's Annual Report: one relating to financial sustainability, specifically medium-term financial planning and the development of a pipeline of recurrent savings and income-generation schemes; and one under improving economy, efficiency and effectiveness, following the Council's self-referral to the Regulator of Social Housing and the finding of non-compliance with the Safety and Quality Standard. It was confirmed that these prior-year weaknesses would be revisited as part of the 2025–26 Value for Money work to assess progress and determine whether further action was required.
- Planning and risk assessment procedures for the 2025–26 audit had commenced on 9 March 2026. Details of the planned audit timetable had been provided to members by way of the letter from Grant Thornton to the Section 151 Officer, included as an appendix to the report, advising all clients of the need, by law, for the 2025-26 audit to be signed off by 21 January 2027. Grant Thornton was working with the Council to put in place procedures enabling the audit to be signed by 20 November 2026.
- Grant Thornton had agreed with the Finance Team that Brent's accounts would be received mid-June and encouraged officers to work to that date to ensure that the auditors had enough time to complete the audit in good time.

Having thanked Sheena Phillips for introducing the report, the Chair then moved on to invite questions and comments from the Committee, with the following issues raised:

- Members raised questions regarding the quality of work provided by the Council's valuer and whether this had improved since concerns had been raised at previous meetings. It was confirmed that work for the 2025–26 audit had not yet commenced; however, Sheena Phillips assured members that conversations had taken place with both the Finance Team and the valuer, which had provided assurance to Grant Thornton that the issues experienced during the 2024–25 audit should not recur and she hoped to see an improvement going forward.
- Moving to the matter of the CIPFA Code changes to the accounting for non-investment assets for 2025–26, members enquired whether these changes would have an effect on the auditing of the accounts for that year. In response, members were informed that the effects of these changes had not yet been fully analysed by Grant Thornton. Sheena Phillips noted that once a risk assessment had been completed, the Council would be informed of Grant Thornton's conclusions.
- Regarding management action recommendations, members asked how the Committee would be kept updated on their progress. In response, Minesh Patel (Corporate Director, Finance and Resources, Brent Council) confirmed that officers could provide updates on those actions to the Committee outside of the formal meeting process as a matter of practice.
- Clarification was then sought regarding the additional £10,000 in fees from Grant Thornton for the finalisation of other elements, with Sheena Phillips explaining that the figure provided in December had been a proposed fee. As a result of the work undertaken by Grant Thornton in January and February, together with previously unknown issues having been identified, the final fee for the audit had increased accordingly.
- Members raised a concern regarding the external audit update identifying risks of significant weaknesses in Brent's value for money arrangements relating to medium-term financial planning and the savings pipeline, and sought details of the specific internal controls that had been strengthened to ensure the quality of financial data, asking for assurances that this would not delay Brent in meeting the 2025–26 statutory backstop deadline of 31 January 2027. In response, Amanda Healy (Deputy Director, Investment and Infrastructure, Brent Council) assured members that the Finance Team had been working closely with other teams, including the Property Team, to address the issues identified during the 2024–25 audit. She particularly highlighted the work to address leasing, which had been identified as a particular area of delay. That work was ongoing for the wider Asset Register, and a number of steps were being taken to get more assurance around completeness of those registers. She confirmed that officers were actively monitoring this area and hoped to see significant improvement for the current financial year.
- Members raised concerns about facing similar unplanned fee increases, and hoped that officers were working at pace to ensure accounts submissions were done on time to avoid additional audit fees. Members asked whether the Council received advance notice of fee increases before they were applied.

Officers explained that they were informed of changes relating to the staffing requirements needed to support the development of work required for the 2024–25 audit during routine update meetings, with those updates subsequently reported to the Committee at its regular meetings. It was confirmed that the Council was in constant engagement with the auditors with the aim of achieving the original outcomes and that the auditors had supported the Council well throughout the year-end process.

As there were no further questions, the Chair thanked Sheena Phillips for presenting the External Audit Update Report and the Committee **RESOLVED** to note the report and the assurances received.

8. To review performance & management of i4B Holdings Ltd and First Wave Housing Ltd

Minesh Patel (Corporate Director, Finance and Resources, Brent Council) was invited to introduce the report, advising the Committee of the governance and oversight arrangements in place for i4B Holdings Ltd and First Wave Housing Ltd (FWH). In presenting the update, he highlighted the following key points:

- The governance framework in place was noted, with both companies overseen through formal Shareholder and Guarantor meetings held biannually with the Chief Executive, Corporate Director of Finance and Resources, and the Deputy Leader of the Council. Both companies produced annual accounts and business plans, which were reviewed and approved by the Council.
- Minesh Patel had met the Board as Shareholder of i4B and Guarantor of FWH at a meeting held on 6 February 2026, which had set out the performance of both companies during 2025-26 and outlined their current business plan and priorities for 2026–27. During the discussion, the Board highlighted that voids remained an ongoing concern, with an improvement plan in place to address that. Rent collection performance was also noted to be below expectations, with a revised improvement plan from the Housing Management Service now in place. The Shareholder and Guarantor had encouraged the Board to consider whether the current tenancy management model remained appropriate and to explore alternative approaches where necessary. Consideration was also being given to expanding support from the Council for i4B and First Wave Housing in relation to exploring new opportunities and providing Supported Exempt Accommodation (SEA).
- Financial performance was reported to be showing early signs of improvement, with a reduction in disrepair cases, a significant reduction in budget variances compared with the previous year, and improved clarity of reporting.
- The longer-term strategic direction of the companies was outlined, including proposals for exploring new ways of increasing stock, such as small-scale development schemes, partnerships with local builders, opportunities in the Home Counties, and the conversion of commercial units. A capacity gap within the companies had been noted, with the Shareholder and Guarantor identifying that additional senior operational or development resource may be required to translate strategic concepts into deliverable work programmes.

- The companies' acquisition programmes were discussed, with i4B having completed on six properties during 2025–26, with a further 13 properties progressing through various stages of conveyancing. Market conditions remained challenging due to price pressures and limited suitable stock.
- Officers spoke to the recent Government announcement of loan availability at 0.1% interest under the Social and Affordable Homes Programme (SAHP) 2026–2036, administered by the GLA, with First Wave Housing working closely with Council colleagues to prepare a bid to support the delivery of additional new homes in the borough.

Having thanked Minesh Patel for introducing the report, the Chair then moved on to invite questions and comments from the Committee. Andrew Hudson (Chair of i4B and First Wave Housing) also attended to assist in responding to queries, with the following comments and issues discussed:

- Assurance was sought that the data correction work to Brent's housing stock data that was being progressed through the Housing Management Service Improvement Plan was also being applied to the Council's subsidiary companies. Members were advised that the recovery plan applied to the Council's Property Management Service, which also applied to the Housing Companies as governed by the SLA, meaning that improvements would apply consistently across all council housing stock and the Housing Companies. Andrew Hudson added that if there were serious failings in the work for the Companies then there would be a need to report that to the Regulator for Social Housing as FWH was a Registered Provider, and the Board applied those same principles to i4B.
- Members followed on from this with requests for confirmation that central registers for smoke and CO detectors had been established, as recommended in the audit. Both Andrew Hudson and Natoya Vincent (Strategy and Delivery Manager, i4B and First Wave Housing) advised that they did not have this information available at the meeting in order to provide an immediate response and committed to sharing the relevant details with the Committee following the meeting.
- The Committee queried whether the Council had assurance that when it issued funds it went towards the specific purpose of supporting the delivery of acquisitions, rather than addressing operational pressures. Minesh Patel advised that the Shareholder and Guarantor meetings received reports which set out the financial performance of the Companies, with regular budget monitoring and support provided to the Companies on financial monitoring so that the Companies, and by extension the Shareholder / Guarantor, was clear where funds were going. It was agreed that the most recent Shareholder and Guarantor reports would be circulated to the Committee.
- The discussion then moved to the extent to which the Council had the ability to restructure i4B to better serve the Council's interests if necessary. In response, Amanda Healy (Deputy Director, Investment and Infrastructure, Brent Council) confirmed that the Council retained full control of the

organisations as their sole owners and lenders, which meant that the Council had the ability to close, restructure or explore alternative arrangements for the companies.

- In regard to a question on whether the viability assessment criteria for acquisitions could be relaxed to increase both companies' contributions to addressing temporary accommodation pressures, officers noted that equity had been placed specifically in i4B, which was another way for the Council to support the delivery of the Company and, whilst not a direct arrangement, represented an investment the Council could make in supporting them to increase temporary accommodation relief.
- A number of questions regarding the companies' operations were raised, exploring whether tenancy management models were being reorganised and whether the identification of a need for additional senior operational or development resource had led to any tangible developments. In response, Minesh Patel confirmed that the current management model operated on the basis of one officer per 300 properties, with officers managing all aspects of a tenancy from commencement through to conclusion. Current work was exploring whether this model represented the most effective use of Council resources in terms of management efficiency and tenant satisfaction. Officers indicated that additional staffing might be required and noted that other models operated with higher ratios of properties per officer alongside more effective rent collection processes. Greater use of efficient processes, combined with enhanced training for a higher number of skilled staff, were identified as essential elements for the solution to the capacity gap. It was also noted that any move towards developing new capabilities, such as building or acquiring large blocks of properties, would require officers with additional and specialist skill sets and a corresponding expansion of operational management capacity.
- In noting the Council's agreed social value commitments, members questioned whether these values could be channelled through i4B and First Wave Housing. Minesh Patel advised that a social value strategy was being developed, which sought to identify how social value could best be secured through the Council and how best value could be achieved. Officers noted that the current Service Level Agreements placed constraints on what might be achievable in this regard, which would require further consideration.
- Moving the discussion on, members asked whether an agreed rent collection improvement plan was currently in place considering the below target rent collection performance. Andrew Hudson confirmed that an improvement plan was in operation, with figures reviewed monthly against current rental data by the Board. More detailed analysis of rental figures was conducted by the i4B Board every two months to allow time for any necessary rental adjustments to be made.
- Members noted that risk 1 of the Risk Register, on the statutory health and safety obligations, was rated red pre-mitigation and green post-mitigation, despite the action status indicating that the risk continued to improve but that some residual non-access risks remained, which implied that the mitigations were not yet fully in place. In response, Andrew Hudson clarified that the final

column of the register was intended to reflect the position only after successful mitigations had been implemented. He acknowledged the need to review and amend the column headings, as members had correctly identified that the current presentation could give a misleading impression regarding items shown as green.

- On the matter of the interest rates referenced in the report and their implications for housing affordability, members questioned the realism of the 0.1% loan rate, noting that it appeared unusually favourable. In response, Amanda Healy referred to recent Government announcements regarding the GLA's Affordable Homes Programme, which had been made available to private Registered Providers. Officers confirmed that, following due diligence, they were exploring opportunities for the Council's companies to access this funding, as the loan facility was not available through the Housing Revenue Account (HRA). When asked how many homes this funding could support and why it was restricted to private providers, officers advised that they were unable to confirm the policy rationale. It was explained that the loan was only offered alongside a grant bid, with housing blocks funded through a combination of grant, loan and potentially additional external finance. Although £2.5 billion of loan funding had been made available nationally, Brent was expected to receive only a modest proportion of this and so it was unclear how many units this could be put towards, if a successful bid was made. Minesh Patel added that the Council would need to continue progressing build phases and bids, subject to the GLA's responses to ongoing enquiries.
- A final query was raised regarding i4B's potential involvement in contributing 22% of costs towards refurbishing a poorly constructed building in Kilburn ward. The estimated cost was over £5 million; however, members noted that the associated risk had been classified at level 2, which they considered comparatively low relative to the scale of the potential liability. In response, officers confirmed that discussions with developers were ongoing and that the final quantum had not yet been agreed, although provision for mitigations against the impact of that contribution had been considered. Further consideration of the scoring was to be given to the matter at the upcoming i4B Board meeting on 26 March 2026.

With no further questions or comments raised, the Chair thanked Minesh Patel, Andrew Hudson and officers for the update provided and the Committee **RESOLVED:**

- (1) To note the governance arrangements and oversight mechanisms in place for i4B Holdings Ltd and First Wave Housing Ltd, together with the update from the most recent Shareholder and Guarantor meeting.
- (2) To provide any further comment to the Chair on areas where additional assurance may be required, following the meeting.

The following were identified as specific actions:

- (1) To provide an update to members on the position for establishing a central register for smoke and carbon monoxide detectors outside of the meeting. (Natoyah Vincent)

- (2) To circulate the Shareholder and Guarantor reports from i4B Holdings Ltd and First Wave Housing Ltd to all members of the Committee. (Minesh Patel / Natoyah Vincent)
- (3) To review the headings of columns in the risk registers to ensure the post-mitigation score reflected that those mitigations may not yet be completed and represented the RAG rating for the successful implementation of the mitigations (Natoyah Vincent).
- (4) To review Risk 13 of the i4B Risk Register in light of the latest information regarding discussions with developers and mitigations in place at the next Risk Register review (Natoyah Vincent)

9. **Procurement Strategy Progress Review**

The Chair introduced the report, commending the quality and detail it provided in relation to the procurement issues faced by the Council. Minesh Patel (Corporate Director, Finance and Resources, Brent Council) further introduced the item on behalf of Procurement colleagues who had sent apologies to the meeting, explaining that some questions may need to be responded to outside of the meeting as a result of their absence. In presenting the Procurement Strategy progress, he highlighted the establishment of the Commissioning, Procurement and Contract Management Assurance Board (CPCMAAB) and a Project Management Procurement Board as significant governance developments, which had enabled both members and officers to engage substantively on procurement-related matters, including the Council's more complex contracts such as its Private Finance Initiatives (PFIs).

In considering the report, the Committee noted the following key areas of progress within the Procurement Improvement Programme:

- A new interim Head of Procurement had been in post since July 2025, with six new permanent appointments made to previously hard-to-fill vacant roles, addressing the long-standing reliance on agency and interim staff.
- The Procurement Strategy 2026–2030 had been developed and approved by Cabinet on 9 March 2026, with the strategy due to go live in April 2026. The strategy was based on three key cornerstones: Community Wealth Building; Effective Contract Management and; Leadership, Commercial Capability and Innovation.
- Good progress had been made on contract management, with over 70 Council contracts reviewed and segmented into tiers to determine the most effective level of contract management. A new Contract Management Framework and Community of Practice had also been established.
- Savings of 111% year-to-date had been realised, with forecast savings of £214,000 in the current year and £330,000 projected for 2026–27, through the Oxygen Finance Fast Track Payment Initiative.

Having thanked Minesh Patel for the outline provided, the Chair then invited the Committee to raise any questions, with the following issues discussed:

- Members raised queries regarding a savings figure referenced at paragraph 7.5.2 of the report. Minesh Patel confirmed the saving to be £240,000, representing a 111% increase from the previous year.
- Members then wished to discuss sole sourcing, and the steps Brent took to avoid procuring by this method, including whether Key Performance Indicators could be used to determine the degree to which the Council was sole sourcing and whether a maximum threshold could be established. In response, Edwin Mensah (Acting Head of Commissioning Contracting and Market Management, Brent Council) advised that this question would need to be taken away for further consideration.
- Moving to the subject of project management, members wished to understand how Brent handled this aspect of procurement. Questions were raised regarding how strong project management was monitored, whether end-of-project reviews were conducted, whether lessons learned were captured, and whether sufficient resources were available. Minesh Patel responded that the answer depended on the project in question, with capital projects operating under different management arrangements to smaller-scale projects, and with recognised inconsistencies across the organisation. A corporate Project Management Office had been established some years previously to support the whole organisation but had not been consistently maintained, and was now seeing a renewed focus. Post-project reviews were undertaken on the Council's Capital programme, but officers could not confirm whether this was a universal practice across all procurement and commissioning. Edwin Mensah added that a suite of training designed to bring consistency to project management across Brent was in the process of being launched.
- Members raised queries over the total fraction of the Council's turnover represented by procurement spend. Minesh Patel undertook to provide a written response to this query following the meeting.
- Members noted that the CPCMAB sub-committee, on which the Vice-Chair and other committee members sat, had considered a number of topics at its most recent meeting, including PFI arrangements. Councillor Chan challenged whether PFI contracts of the length referenced – such as that for the Willesden Sports Centre, awarded for 25 years– could be considered competitively structured, and whether newer contracts were being designed to avoid such long durations. Officers were asked whether an estimate could be provided as to the profits gained by One Life over the contract period and what the Council would do upon expiry. In response, Minesh Patel clarified that One Life was a company appointed by the financiers of the PFI contract, rather than the contract holder itself. Under PFI arrangements, the entity awarded the contract set their own sub-contracts for the construction and operation of infrastructure, as well as the day-to-day running of the asset. The Council then had a set of Key Performance Indicators (KPIs) assessing whether the PFI was operating the asset in the right way. The exit point for the PFI for Willesden Sports Centre was 2031, at which point the Council would regain operational ownership, meaning how that operated going forward would be within the Council's control. Brent was noted to be the second local authority in the UK coming to the end of a PFI arrangement, with learning

being drawn from Sefton Council (the first authority to conclude such a contract) to ensure a stable transition. The Chair added that the conclusion of PFI arrangements represented a significant and ongoing area of work requiring careful management during the transition period. In considering future contract lengths, officers noted that arrangements would aim to align contract end dates with other leisure contracts in the borough, having regard to the durations of other centres' remaining terms in order to undertake procurement that ensures all leisure centre contracts had aligning terms. In terms of the profit made over the 25-year term of the PFI, officers advised that this would be complicated to calculate.

- In relation to the implementation of the new Procurement Strategy, members asked for assurance that officers possessed the necessary skills for effective contract management and negotiation, including project management and KPI engineering, noting a perception that providers were often better resourced and able to secure terms favourable to the contractor. In response, Minesh Patel acknowledged that the Council had historically lacked sufficient procurement capacity, with work underway to fill outstanding vacancies. He further advised that service areas required strengthened capability in contract management and that additional training was planned to support more complex contract negotiations and upskill all departments in terms of contract management. Legal support was also being sought to reduce the inclusion of unfavourable contract clauses and to secure terms more advantageous to the Council. Edwin Mensah added that six new staff members had been appointed within Adult Social Care commissioning to support improved contract design, alongside legal services who were being engaged to develop exit strategies for longer-term contracts. Members reiterated their concern about the limited contract management experience and accountability across the organisation and requested a further update report to hear responses to those concerns. Edwin Mensah acknowledged this and confirmed that contract management training was being delivered at multiple organisational levels.
- In highlighting the report's calls for a cultural reset in procurement towards a more commercial approach, members queried the extent to which directors in each department were engaged in this agenda and whether the Committee could assist in driving departmental alignment.. Edwin Mensah advised that social care commissioning was tough on contract management because of the safeguarding risk involved with social care clients. From working with those groups, he advised that there were some knowledge gaps in contract management skills, with work needed to equalise how contract management was approached regardless of the service. To do that, he felt both a top-down and bottom-up approach would be required to address this deficit. In terms of accountability, Minesh Patel drew members' attention to paragraph 7.3 of the report, highlighting that that forums had been mandated for programmes and projects across all directorates, with all departments reported to be engaged in the ongoing improvement drive. Each department was on a different journey and had different needs both in terms of training and upskilling and in terms of procurement and commissioning.
- Members also asked how artificial intelligence and automation were assisting with these efforts and whether tools such as Match My Project had been

considered. They heard that AI and automation in procurement was in active exploration, with Procurement speaking with departments about the different systems available. Match My Project was being used to link with the community and how the Council could support the community.

- Regarding section 13 of the report and the Council's climate action and sustainability approach in procurement, members requested greater elaboration on the policy. Officers noted this request and confirmed that a written response would be provided following the meeting.
- Members sought clarification on how risk levels within the contract management tiering framework were defined, particularly the designation of "platinum" contracts. Edwin Mensah explained that the framework had originally comprised gold, silver and bronze tiers but had later been expanded to include a platinum category, reflecting contracts or services for which the Council would face significant difficulty in securing alternative provision if those contracts broke down. He cited the example of NRS, a national equipment provider that had collapsed in summer 2024, noting that there had then been insufficient market capacity to be able to absorb the services previously delivered. Officers identified market buoyancy as a key determinant of the tier rating, alongside the potential impact that contract failure could have on Brent's service delivery.
- Members raised concerns regarding the approach of some suppliers towards the public sector and called for greater dynamism in contract management, citing as an example a Council investment in park bins at an estimated £600 per unit. Members also queried whether the Council had specific exit clauses in its contracts and whether such clauses had been exercised in the last five years. In response, Edwin Mensah confirmed that a six-month exit clause existed in all social care contracts and that this provision was currently being utilised to exit an existing contract with a poorly performing provider. Whilst it was in the Council's gift, without the knowledge, expertise and joint collaboration with Legal services those powers were not being exercised.
- In concluding the discussion, members sought further assurance on how the Council could avoid over-dependence on a single provider. Edwin Mensah emphasised that effective market segmentation was essential, as it enabled the Council to identify areas where market development was required. Where markets remained insufficiently buoyant, the Procurement Team was engaged in ongoing discussions on how Brent, as a local authority, could stimulate and develop those markets, thereby expanding the options available to each service and rebalancing procurement in Brent's favour.

With no further comments or questions raised, the Committee **RESOLVED** to note the progress made in delivering the Procurement Improvement Programme, including the approval of the new Procurement Strategy 2026–2030 by Cabinet. The Chair noted that the Committee would seek to revisit this subject during the next municipal year to ensure comprehensive coverage of the issues identified within the report.

The following were identified as specific actions:

(1) For the Committee to receive a further progress update at a future meeting addressing the following issues:

- To expand and provide further explanation on the Council's sustainability approach in the context of procurement and commissioning within section 13 of the report.
- The strategy for sole sourcing in relation to section 7.5 of the report.
- The total spend on Procurement.
- The work and progress in filling procurement support vacancies.
- Consideration to be given to the inclusion of Social Value & Community Wealth considerations within the Council's corporate report.

10. **Review of the use of RIPA Powers**

Due to the absence of senior legal officers, the Chair proposed, with the agreement of all members of the Committee, that the report be noted and that any questions be directed to Minesh Patel (Corporate Director, Finance and Resources). Accordingly, the Committee noted:

- For the current financial year 2025–26, there had been zero RIPA Directed Surveillance or Covert Human Intelligence Sources (CHIS) authorisations, continuing the trend of declining use of covert powers across local authorities.
- Eleven requests had been made for communications data pursuant to the Investigatory Powers Act 2016 during the year, all of which related to the same investigation concerning the alleged misuse of a domestic property as a commercial hotel.

With no questions raised, the Committee **RESOLVED** to note the contents of the report, together with the changes to the RIPA policies to reflect the Council's recent organisational changes.

11. **Annual Review of the Member Learning & Development Programme (MLD) and Members' Expenses (incorporating Review of the Financial and Procedural Rules governing the Mayor's Charity Appeal)**

Amira Nassr (Deputy Director, Democratic and Corporate Governance, Brent Council) introduced the report, advising the Committee that work was underway to develop expanded induction modules and mandatory training programmes for members ahead of the forthcoming elections in May 2026. In presenting the report, the Committee noted the range of Member Learning and Development sessions delivered during 2025–26, the feedback received from members in relation to those sessions, the expenses and childcare claimed by members during the year, and the financial and procedural rules governing the Mayor's Charity Appeal, which had not been subject to any changes during 2025–26.

Having thanked Amira Nassr for introducing the report, the Chair then moved on to invite questions and comments from the Committee, with the following issues discussed:

- Members enquired how increased engagement with training sessions could be achieved. In response, Amira Nassr confirmed that the timing of sessions

played an important role in engagement, with lunchtime sessions notably avoided. Online delivery approaches had seen increased participation, though issues relating to lack of camera use and active engagement had been noted. The upcoming May elections were seen as an opportunity to trial new approaches to improve engagement. Councillor Choudry fed back that some members had found some training sessions too presentation-heavy and technical, and suggested that summary sheets might help. Amira Nassr took those comments on board regarding the interactivity of member learning and development sessions and would incorporate that into the planning process of the member induction process following the May 2026 elections.

- Independent members enquired about the extent of training available for Independent Co-opted Members. In response, Amira Nassr confirmed that general training was available alongside individual training upon request and feedback. Requests were made for standards-specific and equality training, with officers confirming that existing Equity, Diversity and Inclusion (EDI) training provided for all councillors could be extended to include independent members.
- Members wished to know whether skill gaps were specifically targeted within the various committees. In response, Amira Nassr stated that, whilst committee members were appointed by party groups, some consideration was given to members' skill sets and background knowledge. It was confirmed that provision for skills gaps would need to be considered, with new member training programmes available to address ad hoc training needs. Rhys Jarvis noted the importance of conducting a skills audit following party appointments to committees, which officers agreed to consider.
- The benefits of a forward plan for training sessions were discussed, with members noting that this would prevent future training from feeling disconnected and would help to highlight additional development opportunities. In response, officers confirmed that a forward plan for training was available and would be shared with members, along with the complete member induction programme.
- On the subject of personal development plans and the management of over-subscriptions to sessions, Amira Nassr confirmed that training providers had good relationships with the Member Learning and Development team and could likely increase capacity to match demand, with the possible addition of simultaneous sessions to stagger stage-one training in the latter part of 2026. It was also suggested that officer training sessions could potentially be made available to include members. Amira Nassr acknowledged that these might contain technical information not directly relevant to members but confirmed that this could likely be facilitated, where appropriate, based on member feedback.

With no further questions raised, the Committee **RESOLVED** to note the work being undertaken by the Member Learning and Development Steering Group in continuing the effective training and development of Brent's elected representatives, together with member feedback, expenses claimed in 2025–26 and the financial and procedural rules governing the Mayor's Charity Appeal.

12. **Annual Standards and Governance Report for 2025 (including quarterly update on gifts and hospitality)**

The Chair introduced the report, advising the Committee that it had been prepared by the Director of Law (Monitoring Officer), who was unable to be present at the meeting. In light of this, members agreed that the report be taken as read. The report advised members that, during 2025, the Monitoring Officer had received ten complaints alleging breaches of the Members' Code of Conduct, with three not progressing beyond the Initial Assessment Stage, six not progressing beyond the Assessment Criteria Stage, and one not progressing beyond the Review Stage. All mandatory training for members had been completed during 2025. The report also recommended an amendment to the Members' Code of Conduct Complaints Procedure to extend the normal deadline for carrying out an initial assessment from 10 to 15 working days, to better reflect the time-consuming nature of the complaints process in practice.

Having noted the report, the Chair invited questions and comments from members of the Committee, with the following issues discussed:

- A comment was raised regarding recommendation 2.2 of the report, which covered the proposed extension of the timeframe for completing an initial assessment. It was noted that such cases could be complex and time-consuming, with an increasing number of complaints using AI to create superficially credible allegations. Stephen Ross (Independent Co-opted Member) indicated that 15 working days was a reasonable timeframe, whilst noting that some authorities had extended this further to 30 working days, which might be appropriate in particularly complex cases.

With no further questions or comments raised, the Committee **RESOLVED** to:

- (1) Note the contents of the Annual Standards and Governance Report for 2025.
- (2) Recommend to the Audit and Standards Committee that the normal deadline for carrying out an initial assessment under the Members' Code of Conduct Complaints Procedure be extended to 15 working days.

The following was identified as a specific action:

- (1) An inaccuracy in the Member Code of Conduct report to be corrected, with the word 'not' confirmed as having been omitted from the comments recorded on complaint 8, dated 17 December 2025, on page 96 of the agenda pack.

13. **Internal Audit Plan 2026-27 and Internal Audit Strategy 2024-27 Year 2 Review**

Darren Armstrong (Deputy Director, Organisational Assurance and Resilience and Head of Internal Audit, Brent Council) was invited to introduce the report, covering the developments made to the Council's Internal Audit function since adopting its revised hybrid and flexible approach, which was now entering its third year of operation. The plan for 2026–27 was contained within Appendix 1 to the report, with priority ratings applied to all planned risk-based audits.

In presenting the report, members were advised:

- Section A covered core assurance work for 2026–27, providing coverage of key and core financial systems and controls.
- Section B set out the Audit Team’s agile risk-based plan, designed to be flexible and responsive to emerging risks outside the scope of the core assurance plan, with an overview of the Council’s intended audits for 2026–27. Priority ratings had been included to inform the Committee of the relative urgency of the risks identified.
- Section C covered consultancy and advisory work, comprising primarily reactive activity following requests from senior leadership, with four consultancy and advisory reviews planned for the coming year.
- Section D covered ongoing work, including active audits and the tracking of progress through to completion.
- Section E reflected the Council’s strategic risks within the plan, demonstrating the coverage of the Internal Audit function against each key strategic risk.
- Section F was included for the Committee’s information, setting out the assurance ratings intended to be applied to completed audits in 2026–27.
- Appendix 2 reported on the achievements made by the Council in meeting its strategic objectives. With work entering the final year of the current three-year plan, efforts were already underway to determine the goals and objectives for the subsequent three-year plan, with an overarching organisational resilience theme identified for 2026–27 work, recognising the heightened level of strategic uncertainty under which the Council was operating. Certain audit scopes would be extended, and an integrated assurance pilot involving experts from across the Council – including Health and Safety, Emergency Planning and Counter Fraud – would be introduced to provide additional assurance.

Having thanked Darren Armstrong for presenting the report, the Chair then invited questions and comments from the Committee, with the following issues discussed:

- Members enquired about AI governance, which was listed for follow-up audit in Q2 2026, and requested confirmation on the status of the Council-wide AI Strategy and Data Ethics Board, as well as how the Council was protecting itself from cyber risks associated with the rapid deployment of new automations. In response, Darren Armstrong confirmed that AI governance audit conclusions had been reflected in the September audit report and in recent action plans, setting out the Council’s commitments to addressing these matters. Board-level assurance on AI and follow-up work on AI governance were planned accordingly. On the question of cyber risk, this was subject to annual assurance as a standing commitment within the core assurance programme, with a number of controls and mitigating actions already in place.

- Members asked whether audit reports were built back into the work undertaken to close entries on the risk register. In response, Darren Armstrong confirmed that the risk register was one of several information streams feeding into audit activity. Reports from assurance providers played a key role in informing audit progress, with issues identified by providers scored and used to assess the maturity of risks in different areas. Duplication and repetition of audit risks and findings were not accepted, with findings from previous audits factored into subsequent risk assessments to avoid such overlap.
- Regarding the Internal Audit Strategy and the streamlining of the follow-up process, members noted that the percentage of days allocated to follow-up activity was currently 19% and sought clarification as to whether reducing the administrative burden in this area would result in more in-depth follow-up or additional capacity for other audit work. In response, Darren Armstrong confirmed that the function was modernising its follow-up processes, including through automated email reminders. Any time freed up as a result would be reinvested primarily into greater levels of follow-up activity, potentially enabling additional forms of audit engagement, whilst also improving the service for auditees and allowing more time to assess whether controls had been fully embedded.
- Members noted that both the lack of affordable accommodation and non-compliance with housing duties within Brent featured on the Strategic Risk Register and sought clarification on what a likelihood score of 5 meant in the context of the register. Darren Armstrong explained that these were treated as separate items within the register and confirmed that a likelihood score of 5 indicated that the relevant risk was considered very likely to materialise.
- Members sought to gauge whether the direct access provided to the Internal Audit Team by the Chief Executive had improved the effectiveness of the function and whether a positive cultural change was developing across the Council in response to audit findings. In response, Darren Armstrong confirmed that the Internal Audit Team had been provided with improved access to both the Chief Executive and the wider Council, and that the function was aligned with the organisation's direction of travel, producing positive outcomes in terms of risk improvement and audit efficiency. The team was stated to now sit on a number of governance boards, ensuring that management intelligence informed audit strategy, and provided regular updates to the Corporate Management Team. Corporate Directors were also reported to be finding it easier to hold Heads of Service to account, with concerns now being raised more consistently at the right levels and at the right times.
- Members observed that organisational resilience was identified as a new overarching theme in the plan and asked whether training would be provided to members to assist them in asking the right questions to support this agenda. In response, Darren Armstrong outlined how the Audit Team worked with Brent as an organisation to add value, improve resilience arrangements and strengthen governance and control. Changes had been set out in a scoping document, seeking to define what would be undertaken for each risk, how it would be approached, and the precise nature of the assurance the

team would provide. Service area controls, IT systems and business continuity arrangements would all be reviewed to ensure, for example, that payments to vulnerable residents could continue during any period of system downtime. Where arrangements were not found to be in place, Darren Armstrong confirmed that the Internal Audit Team would work to support their implementation.

- Members wished to know whether vehicle reliability had been incorporated within the scope of the audit listed as RB25, which explored SEND transport, as this had been reported to them as a significant operational issue. Officers confirmed that the scope of that review had not yet been defined but that the points raised by members would be noted. It was also noted that organisational resilience was intended to be a collaborative and collective exercise, with the team's intended scope drawn on business continuity methods.
- Concerns were expressed regarding the likelihood of lower-priority audits receiving coverage. In response, Darren Armstrong confirmed that items designated as priority 3 might not remain at that level throughout the year, given the plan's flexibility and the regular reviews undertaken to adjust priorities in response to new developments. Items could also be progressed earlier if capacity permitted, with any changes communicated to the Committee.
- In relation to the Renters' Rights Act and its implications for homelessness and housing demand, Matteo Biondi (Deputy Head of Assurance, Brent Council) advised that, whilst the Act was expected to reduce homelessness in the longer term, a surge in evictions had been observed in advance of the legislative change taking effect. The current impact on private landlords could not yet be fully assessed, but this would be incorporated into the scope of the relevant audit. Darren Armstrong added that these were matters under active discussion with wider Council management.
- Members raised concerns regarding the Council's telephone lines, noting that residents had reported waiting on hold for over an hour before being disconnected, and asked whether an audit into this issue could be accommodated within the current programme. In response, Darren Armstrong confirmed that this was possible. The Internal Audit Team would seek to determine the scope of improvement work currently planned, the improvements proposed and how assurance could be provided regarding their implementation.

In closing the discussion, the Chair noted that demand seriously exceeded resources in a number of the areas under consideration and emphasised the importance of the Committee's oversight role in driving improvements. The Committee then **RESOLVED** to:

- (a) Consider and note the Internal Audit Plan for 2026–27.
- (b) Note the Internal Audit Strategy 2024–2027 Year 2 Review.

14. **Audit Findings (ISA 260) Report for the London Borough of Brent 2024-25**

The final Audit Findings (ISA 260) Report for 2024–25 was received by the Committee for information and reference, having been finalised following the completion of the external audit on 25 February 2026.

With no further issues raised, the Chair thanked Sheena Phillips and the Grant Thornton team for their hard work and efforts in delivering the Council's external audit. The Committee **RESOLVED** to note the final Audit Findings (ISA 260) Report for the London Borough of Brent 2024–25.

15. **Audit & Standards Advisory Committee Draft Work Programme 2026-27 & Dates of Future Meetings**

The Committee noted the provisional work programme for the 2026–27 Municipal Year and the provisional dates identified for future meetings.

Members noted that all meetings were scheduled to commence at 6.00 pm and would be held in person at Brent Civic Centre. It was agreed that the work programme would be considered further at the next meeting.

The Committee **RESOLVED** to note the draft Work Programme for the 2026–27 Municipal Year and the dates of future meetings.

16. **Evaluating the Effectiveness of the Audit & Standards Advisory Committee 2025-26**

The Chair provided a verbal update on the approach being taken to seek members' views on the effectiveness of the Committee during the 2025–26 municipal year, for inclusion in the Chair's Annual Report. The Chair noted that the demands placed on the Committee were rising rapidly and invited members to submit their feedback and ideas for how the Committee could best respond to those demands to Darren Armstrong (Deputy Director, Organisational Assurance and Resilience, Brent Council).

The Chair took the opportunity to formally express his thanks to the Governance and Finance teams, the External Audit team from Grant Thornton, and all members of the Committee for their contributions and commitment during the 2025–26 municipal year. Special mention was made to Harry Ellis and James Kinsella for their support in administering the meetings throughout the year.

The Chair also formally thanked Councillor Chan, who was stepping down from the Committee, for his valued contribution as Vice-Chair and for the scrutiny and commitment he had brought to the role throughout his tenure. Councillor Chan, in turn, thanked the officers and members who had supported his work on the Committee, with particular thanks expressed to Harry Ellis and James Kinsella for their administrative support and to all current and former members. He also extended his gratitude to the Independent Members and to David Ewart for his guidance and expertise in chairing the Committee.

17. **Any other urgent business**

No items of urgent business were identified with the Chair expressing his appreciation to members for their valuable input and contributions during what was felt to have been a constructive session.

The meeting closed at Time Not Specified

David Ewart
Chair