



Cabinet

Monday 7 September 2026 at 10.00 am

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

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

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

Membership:

Lead Member Councillors:

Portfolio

M Butt (Chair)	Leader of the Council & Cabinet Member for Adult Social Care
Grahl	Deputy Leader and Cabinet Member for Finance & Resources
Amadi	Cabinet Member for Communities, Culture & Cost-of-Living Support
Dixon	Cabinet Member for Community Safety and Public Health
Johnson	Cabinet Member for Housing, Homelessness & Renters
Kelcher	Cabinet Member for Regeneration & Planning
Knight	Cabinet Member for Cleaner Streets, Transport & Public Realm
Rubin	Cabinet Member for Children's Services, Employment & Climate Action

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

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Notes for Members - Declarations of Interest:

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

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

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

***Disclosable Pecuniary Interests:**

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

****Personal Interests:**

The business relates to or affects:

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

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

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

or

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

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

Agenda

Introductions, if appropriate.

Item	Page
1 Apologies for Absence	
2 Declarations of Interest	
Members are invited to declare at this stage of the meeting, the nature and existence of any relevant disclosable pecuniary or personal interests in the items on this agenda and to specify the item(s) to which they relate.	
3 Minutes of the Previous Meeting	1 - 16
To approve the minutes of the previous meeting held on Monday 27 July 2026 as a correct record.	
4 Matters Arising (if any)	
To consider any matters arising from the minutes of the previous meeting.	
5 Petitions (if any)	17 - 18
To receive and consider any petitions for which notice has been provided under Standing Order 66.	
Members are asked to note that the following petition is due to be presented at the meeting:	
(a) Opposition to installation of perimeter fencing College Green Open Space	
The supporting details on the petition have been attached, for reference.	
6 Reference of item considered by Scrutiny Committees (if any)	
To consider any reports referred to Cabinet by either the Community & Wellbeing or Resources & Public Realm Scrutiny Committees.	
Resident & Housing Services reports	
7 Brent's Gypsy, Roma & Traveller Framework and Action Plan 2026-2030	19 - 58
This report sets out Brent's new Gypsy, Roma and Traveller Framework and Action Plan including the commitments that Brent Council makes to	

supporting its Gypsy, Roma and Traveller communities and how it will deliver and monitor progress and impact. The Framework has been informed by engagement with Gypsy, Roma and Traveller communities with a summary of consultation and engagement findings included within the draft Framework and detailed Action Plan to sit alongside the Framework.

Ward Affected:
All Wards

Lead Member: Cabinet Member for Housing, Homelessness & Renters (Councillor Robert Johnson)

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

Children, Young People & Community Development reports

8 Future Commissioning and Delivery Options for Best Start Family Hubs Support Services 59 - 86

This report seeks Cabinet approval to insource Best Start Family Hubs (BSFHs) support services, currently delivered by Barnardo's Services Limited, when the existing contractual arrangements come to an end in March 2027 in support of a more integrated, Council-led Family Hub and Early Help model from April 2027.

Ward Affected:
All Wards

Lead Member: Cabinet Member for Children's Services, Employment & Climate Action (Councillor Jake Rubin)

Contact Officer: Serita Kwofie, Head of Early Help
Tel: 020 8937 1747
serita.kwofie@brent.gov.uk

9 Outcome of informal consultation on the amalgamation of Roe Green Infant School and Roe Green Junior School 87 - 120

This report provides a summary of the informal consultation undertaken between June and July 2026 on the proposal to amalgamate Roe Green Infant School and Roe Green Junior School as one primary school for children aged between 3 – 11, including provision for nursery aged children and recommends a move to formal consultation through the publication of a statutory notice on the closure of Roe Green Junior School, the expansion of the age range at Roe Green Infant School and the change of name of Roe Green Infant School to Roe Green Primary School.

Ward Affected:
Queensbury

Lead Member: Cabinet Member for Children's Services, Employment & Climate Action (Councillor Jake Rubin)

Contact Officer: Shirley Parks, Director,

10 Proposal to expand Phoenix Arch Special School on the Strathcona Site 121 - 144

This report provides a summary of the formal consultation undertaken between June and July 2026 on a proposal to expand Phoenix Arch Special School by 50 places using the Strathcona site (Strathcona Road, Wembley, HA9 8QL). The proposal responds to increasing demand for special school places across the borough for children who present with autistic spectrum condition (ASC) with Cabinet recommended to determine the statutory notice to expand Phoenix Arch Special School by 50 pupils through use of the Strathcona site in September 2027.

Ward Affected:
Preston

Lead Member: Cabinet Member for Children's Services, Employment & Climate Action (Councillor Jake Rubin)

Contact Officer: Shirley Parks, Director, Education, Partnerships and Strategy
020 8937 4259
Shirley.parks@brent.gov.uk

Chief Executive's reports

11 Delivering Brent's 2024-2028 EDI Ambitions: Two Years On 145 - 182

This report sets out the progress made in delivering the EDI Strategy, Anti-Racism Action Plan and EDI Board priorities during Year 2 and also supports the council's obligation under the Public Sector Equality Duty to publish annual information demonstrating how we are complying with the equality duty.

Ward Affected:
All Wards

Lead Member: Deputy Leader and Cabinet Member for Finance & Resources (Councillor Gwen Grahl)

Contact Officer: Sarah Milner-Barry, EDI Strategy Lead
020 8937 2891
sarah.milner-barry@brent.gov.uk

Finance & Resources reports

12 Treasury Management Outturn Report 2025-26 183 - 218

This report presents the outturn for the Council's Treasury Management activities for 2025/26 updating Members on both the borrowing and investment decisions and Council's Treasury Management performance.

Ward Affected:
All Wards

Lead Member: Deputy Leader and Cabinet Member for Finance & Resources (Councillor Gwen Grahl)

Contact Officer: Oliver Simms, Head of Finance (Capital, Treasury and Commercial)

Tel: 020 8937 1679

Email: Oliver.Simms@brent.gov.uk

13 Exclusion of Press and Public

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

14 Any other urgent business

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

Date of the next meeting: Monday 12 October 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 CABINET

Held in the Conference Hall, Brent Civic Centre on Monday 27 July 2026 at
10.00 am

PRESENT: Councillor M Butt (Chair), Councillor Grahl (Vice-Chair) and Councillors Amadi, Dixon, Johnson, Kelcher, Knight and Rubin.

Also present: Councillors Perrin

1. **Apologies for Absence**

Apologies for absence were received from Jehan Weerasinghe (Corporate Director Neighbourhoods and Regeneration) with Gerry Ansell (Director of Inclusive Regeneration and Climate Resilience) attending as his representative, and Pameel Crowther-Newman (Head of Litigation and Dispute Resolution) with Bianca Robinson (Principal Lawyer, Constitution Governance and Finance) attending as her representative.

2. **Declarations of Interest**

No declarations of interest were made during the meeting.

3. **Minutes of the Previous Meeting**

Cabinet **RESOLVED** that the minutes of the previous meeting held on Tuesday 22 June 2026 be approved as a correct record of the meeting.

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

None identified.

5. **Petitions (if any)**

There were no petitions presented to the meeting.

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

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

7. **Financial Outturn Report 2025-26**

Councillor Grahl (Deputy Leader and Cabinet Member for Finance and Resources) introduced a report from the Corporate Director Finance and Resources presenting

the 2025-26 financial outturn for the General Fund, Housing Revenue Account (HRA), Dedicated Schools Grant (DSG) and the capital programme.

In presenting the report, Councillor Grahl began by highlighting, as part of her new Finance & Resources portfolio, the significant challenges Brent Council and other local authorities were facing in relation to unprecedented funding pressures, high inflation, rising demand for essential services, in particular Adult Social Care, and the ongoing housing crisis affecting residents.

In outlining the 2025-26 year-end position, she confirmed that the Council ended the previous financial year with a general fund overspend of £18.3m which had been met from reserves specifically set aside to manage financial pressures, a Dedicated Schools Grant deficit recorded at £6.6m, and a break-even HRA position. She advised that this came during another demanding year in which the Council had been required to deliver £20.4m of cuts whilst protecting essential services and responding to increasing demand, which she felt reinforced the need for stronger financial control, better forecasting and the full delivery of agreed savings and mitigations.

Whilst recognising the funding pressures the local authority was facing, Councillor Grahl also felt it important to acknowledge where progress had been made and listed several areas of improvement that should be commended, including historic debt falling by £23.7m, which was the first overall reduction in five years, Council Tax Collection improving to 91.6%, and Business Rates Collection increasing to 94.1%. She attributed those improvements to additional capacity that had been put into those services, earlier recovery action, better use of data and more targeted engagement with residents.

In welcoming these improvements, Councillor Grahl also recognised the ongoing nature of challenges faced by many residents with the Council having invested £1.5m into a Hardship Fund that had supported more than 13,000 households facing genuine financial difficulty. She highlighted that the Council continued to invest in Brent's future, with more than £200m invested through the capital programme in housing, regeneration, roads, parks, public buildings, additional SEND places and the completion of 543 new Council homes.

Having detailed the progress made over the previous financial year, Councillor Grahl again emphasised the seriousness of the underlying pressures, with the biggest overspends concentrated in services the Council had legal and moral responsibilities to provide. Housing Needs and Support had recorded a large overspend last financial year, with nearly 8,000 homelessness applications which represented an increase of 40% compared with the previous March. Adult Social Care had also recorded an overspend with more older people requiring increasingly complex care requirements, and the cost of homecare, residential care and nursing placements continuing to increase significantly. She advised that these were not discretionary pressures that the Council could ignore, but the consequences of an ageing population, an unaffordable London housing market, rising private rents and a care market where costs continued to outstrip available funding.

In detailing the pressures being faced, Councillor Grahl asserted that the Council would continue to take responsibility for areas within its control through strengthened forecasting, challenging unnecessary expenditure, collecting income

owed to the Council and holding services accountable for delivering within their budgets. She pointed out, however, that Councils could not resolve the national housing crisis, reform the care market or repair the SEND funding system alone, and therefore welcomed the Government's commitment to multi-year financial settlements and stronger recognition of need and advocated for that commitment to now be followed by sustainable funding for homelessness, Adult Social Care and SEND, concluding that Cabinet needed to be disciplined in protecting the services which Brent residents depended on.

In recognising the challenges being faced whilst also commending the improvements and prudent financial management of the overspend, Cabinet **RESOLVED** to note the financial outturn for 2025-26.

8. **Quarter 1 Financial Forecast 2026-27**

Councillor Grahl (Deputy Leader and Cabinet Member for Finance and Resources) introduced a report from the Corporate Director Finance and Resources presenting the financial forecast for the General Fund revenue budget, the Housing Revenue Account (HRA), the Dedicated Schools Grant (DSG) and the Capital Programme as at Quarter 1, 2026-27.

In presenting the report, Councillor Grahl began by advising members that whilst recognising the nature of pressures identified, there were also signs that the approach taken over recent months was making a difference. Although highlighting that the General Fund was forecasting a £9.5m overspend, which was not where the Council wanted to be, it was felt important for members to understand that the pressure was concentrated almost entirely on pressures relating to homelessness and temporary accommodation with all other services forecasting a balanced budget at the time of reporting.

In recognising that housing remained the biggest challenge to the Council's budget position, Councillor Grahl detailed the significantly high cost of private rents and scarcity of affordable homes as factors leading more families to turn to the Council for support. Whilst an additional £8m of funding had been allocated to Housing Need for the reporting year, demand had continued to rise. Councillor Grahl affirmed that Brent could not resolve London's housing crisis alone, but could build homes, reduce reliance on the most expensive temporary accommodation, regulate the quality of private accommodation through the licencing scheme and help families into secure housing. As such, 406 new social homes were expected to become available, and she advised that the Council had already moved 89 households out of some of the costliest temporary accommodation, using new Council homes to help residents in greatest need. She confirmed that this gave families greater stability whilst also saving the Council money.

In outlining other areas of work that would help to reduce pressures on the Council's finances, Councillor Grahl highlighted The Gardens Children's Home which would help to support more young people in Brent rather than relying on expensive external placements, as well as the delivery of more than £320m of capital investment in homes, schools, SEND provision, regeneration and local infrastructure. There were £10.4m of agreed savings to deliver, and she confirmed that this year's approach would not focus on asking services to make isolated cuts, but to work together with departments to improve productivity, use technology more

effectively and identify new income, which she highlighted in her view was a more sustainable way of operating.

In addition, the opportunity was also taken to remind members of the longer-term risk associated with the Dedicated School Grant (DSG) with Councillor Grahl welcoming the approach adopted by the Government in terms of the commitment to support 90% of eligible High Needs Deficits and as a sign that the need for reform had been recognised.

In concluding her remarks, Councillor Grahl recognised that there was more to do and the Council needed to maintain a firm grip on spending throughout the year but affirmed that the Council was not standing still and simply managing decline, but building homes, investing in Brent and changing the way the organisation worked with Cabinet asked to note the forecast and endorse the actions being taken.

The Leader thanked Councillor Grahl for her introduction and invited Minesh Patel (Corporate Director Finance and Resources) to supplement her comments. In support of the issues highlighted, Minesh Patel reinforced the comments around the DSG, which he advised remained one of the most significant areas of uncertainty. The Council had submitted its plan to show how it was managing the DSG High Needs Block last month and the Government had announced they would look to reduce 90% of those cumulative deficits, however there was still a strong likelihood of overspend of the High Needs Block in 2026-27, therefore the Council was pushing to understand the support that would be provided from the Government until those funding reforms were implemented.

In considering the report and acknowledging the significant pressures within Housing Need and Temporary Accommodation, Cabinet **RESOLVED**:

- (1) To note the overall financial position and the actions being taken to mitigate the issues arising.
- (2) To note the prudential indicators for treasury management in Appendix A of the accompanying report.
- (3) To approve the virements set out in section 5.13 of the accompanying report.

9. **Medium Term Financial Outlook**

Councillor Grahl (Deputy Leader and Cabinet Member for Finance and Resources) introduced a report from the Corporate Director Finance and Resources presenting the overall financial position facing the Council and highlighting the significant risks, issues and uncertainties with regards to the Council's Medium Term Financial Strategy (MTFS), as well as setting out the Council's proposed budget setting strategy for 2027-28.

In presenting the report, Councillor Grahl advised that the report looked beyond the immediate pressures and set out the choices facing Brent up to 2031-32, with Brent starting from what she believed was a position of relative strength, having remained financially stable at a time when a growing number of Councils required exceptional support or government intervention. She also emphasised the impact of the multi-year funding settlement which had been offered for the first time in many years. In

addition, the Fair Funding Review and reset of Business Rates had delivered a fairer share of resources for Brent, with greater recognition of deprivation and the demands on Councils to deliver services, which she expressed was a welcome change of direction providing more certainty and a foundation on which to plan.

Whilst welcoming the changes to funding from central Government, Councillor Grahl cautioned that there was still significant challenge for the Council, with a current estimated budget gap of £5m in 2027-28, rising by a further £15m the following year, and a cumulative gap of around £50m across the period 2031-32. She highlighted that this was made up largely of the additional costs of maintaining the services the Council already provided as inflation, demographic change and increasingly complex needs drove demand. Since 2010, she highlighted that Brent had already agreed £248m of savings, almost half its current net revenue budget, and was delivering a further £10.4m in the current financial year, leaving little scope to seek further reductions in the same way and areas moving forward.

As such, she felt the next phase in the Council's strategy must be different and focused on redesigning services rather than shrinking them further. This meant investing in prevention, making better use of technology, improving productivity, strengthening commissioning and generating more income, whilst fostering stronger culture and leadership to work as one Council rather than protecting individual departmental budgets and operating in silos.

In moving forward with that approach, Councillor Grahl highlighted that the pressures faced were concentrated in areas where the Council had little control, with individuals living longer and requiring more complex care, specialist children's placements adding significant pressures on costs, demand for Education, Health and Care Plans (EHCPs) growing and placing sustained pressure on the Dedicated Schools Grant (DSG), and the immediate risk presented by the demand in homelessness, where the cost of temporary accommodation had increased far more quickly than private rents and Brent's net homelessness expenditure had risen by 85% in a single year.

In addressing the pressures, she confirmed that the Council would continue to use every lever available to continue to support residents whilst managing its financial situation. In the previous year, 67% of homelessness approaches were successfully prevented or relieved, and the Council's wholly owned housing company, i4B, generated annual savings of more than £6m by providing affordable homes to homeless families. The Gardens Children's Home would also provide local care at a lower cost than many private placements, and new prevention funding would help support families earlier. Whilst the Council took action where it could, she emphasised that it could not repair the housing market, reform the national care system, or resolve the SEND crisis alone, and called for further reform with proper funding.

Reflecting on Brent's future, Councillor Grahl acknowledged that financial responsibility could not mean lowering the Council's ambitions for Brent. She highlighted that the revised capital programme provided more than £1.25bn over five years to provide affordable housing, regenerate South Kilburn, make improvements to highways, deliver additional SEND places, provide CCTV, deliver family facilities, and complete essential repairs to homes and public buildings. The Pride in Place Programme would also deliver up to £40m for projects focused on

Harlesden and St Raphael's Estate over the next 10 years, with residents involved in deciding how that money would be used. She added that building homes, improving places and unlocking development created jobs and generated additional Council Tax, Business Rates and Community Infrastructure Levy income, contributing to a robust financial strategy.

In concluding her remarks, Councillor Grahl acknowledged that the multi-year settlement had given the Council a window to prepare properly, and committed to use that to rebuild resilience, develop a two-year budget plan, and align finances with the next Council Plan with greater funding certainty, a clearer picture of the risks, and time to make strategic choices. On this basis, Cabinet was therefore asked to note the outlook, agree the budget-setting and consultation process, approve the proposed capital adjustments and note the position of the Housing Revenue Account and Dedicated Schools Grant.

In recognising the challenges and endorsing the way forward, Cabinet **RESOLVED**:

- (1) To note the contents of the report and the potential financial impact on the Council's Medium Term Financial Strategy.
- (2) To agree the budget setting process for 2027-28, including the approach to consultation and scrutiny, as set out in section six of the accompanying report.
- (3) To note and agree the proposed 2025-26 capital budget carry forwards and capital virements for 2026-27, as set out in section seven of the accompanying report.
- (4) To note the financial position with regards to the Housing Revenue Account, as set out in section eight of the accompanying report; and
- (5) To note the financial position with regards to the Schools and Dedicated Schools Grant, as set out in section nine of the accompanying report.

10. **Bridge Park Complex Regeneration Proposals**

Councillor Matt Kelcher (Cabinet Member for Regeneration and Planning) introduced a report from the Corporate Director Neighbourhoods and Regeneration seeking endorsement of the recommendations for the Bridge Park Complex Regeneration, as detailed in section 2 of the accompanying report.

In presenting the report, Councillor Kelcher began by expressing his pride at being able to bring the proposals to Cabinet, which he felt brought the Council closer to its ambitions around Bridge Park and the wider Hillside Corridor. He advised that the proposals brought closed-off, underused buildings needing significant regeneration back into positive use with benefits including housing, employment opportunities with the new hotel, and the new leisure centre which would contribute to a wider commitment to make Brent a Borough of Play. He highlighted that, currently, only 12% of Brent residents on low income could walk to a swimming pool, and when the work was complete on the new leisure centre that figure would increase to 80%, bringing swimming closer to home for those struggling to access the activity which

he felt delivered on the Council's commitment to equity and providing opportunities for all residents.

Having acknowledged the benefits of the scheme to the local community, Councillor Kelcher also recognised the historic importance of the site within Black British history, assuring members that this had been a sensitive project as it had moved forward, and he would ensure that the history of the site was respected and that residents remained at the heart of the regeneration.

In concluding his remarks, Councillor Kelcher identified the proposal as an exciting opportunity across leisure, physical activity, housing, and employment, which turned an underused and unattractive building into something he hoped the Council and residents could be proud of, whilst respecting the unique history and heritage of the site.

In supplementing the introduction, Councillor Liz Dixon (Cabinet Member for Community Safety and Public Health) highlighted that the proposals had very strong alignment to the Council's active wellbeing priorities, providing an accessible place for families in the summer holidays, particularly the much needed water space.

Members thanked Councillor Kelcher and officers for bringing the proposals forward, which they felt at their core focused on the health and wellbeing of the communities who used Bridge Park. Recognising the substantial health inequalities in Brent in comparison to London and North West London, Cabinet was pleased that the project prioritised building civic infrastructure and saw this as part of a broader context linked to wider ambitions relating to the provision of free swimming for under 18s and a proposed ambition to eventually build a lido in the borough. Members echoed the sentiment that this was an opportunity to strengthen culture and wellbeing in Brent to create a vibrant neighbourhood where residents of all ages could live, connect and thrive and provide stronger social connections and a new sense of tribe and belonging.

Members also acknowledged the employment and skills opportunities that would be unlocked with these proposals, including new provision for Brent Start, as well as the substantial number of homes that would be delivered on the site. In support of the overall approach outlined and recognising the community support for taking the scheme forward, Cabinet **RESOLVED**:

- (1) To note the current position on the Department for Culture, Media and Sport (DCMS) decision and awarding of the Certificate of Immunity for Bridge Park Community Leisure Centre and Technology House.
- (2) To acknowledge the wider Bridge Park masterplan and the planning strategy for the site and agree for the Council to submit their elements of the planning application which would include the provision as set out in paragraphs 3.2.6 – 3.2.11 of the accompanying report.
- (3) To agree the revised facility mix for the new leisure centre and the scheme delivery phasing proposals for the council-led development, with the leisure centre forming Phase 1 and the Adult Education and Community Building

forming Phase 2, as set out in paragraphs 3.2.12 – 3.2.27 of the accompanying report.

- (4) To note the creation of a Community Engagement Group to refine the design and facility mix for Phase 2 of the Council's development.
- (5) To approve the use of a call-off procedure under the SCAPE Construction Framework for the contracts for Phase 1 of the Bridge Park Regeneration Programme on the basis of the pre-tender considerations set out in paragraph 3.2.39 of the accompanying report.
- (6) To delegate authority to award the pre-construction services and main works contracts to the Corporate Director Neighbourhoods and Regeneration, in consultation with the Cabinet Member for Regeneration and Planning.
- (7) To approve a revised total capital budget of £53.50m to deliver Phase 1 of the Bridge Park regeneration noting that the capital budget for Phase 2 (Adult Education and Community Building) would follow in a separate paper in due course.
- (8) To agree the use of up to £39.00m of Strategic Community Infrastructure Levy funding for Phase 1 of the Bridge Park regeneration programme.
- (9) To note that the Conditional Land Sale Agreement (CLSA) was contingent upon planning and financial condition and delegate authority to the Corporate Director Neighbourhoods and Regeneration, in consultation with the Cabinet Member for Regeneration and Planning to finalise and complete the CLSA and enter into the final transfer agreement and any other ancillary documents that may be required.
- (10) Subject to planning approval, to delegate authority to the Corporate Director Neighbourhoods and Regeneration to agree to appropriate the lands under section 122 Local Government Act 1972 and thereafter, engage the powers conferred by section 203 of the Housing and Planning Act 2016 to override easements and other rights.

11. Brent Infrastructure Funding Statement 2024-25

Councillor Matt Kelcher (Cabinet Member for Regeneration and Planning) introduced a report from the Corporate Director Neighbourhoods and Regeneration presenting the Council's sixth Infrastructure Funding Statement (IFS), prepared in line with the Community Infrastructure Levy (CIL) Regulations (amended 2019).

Before introducing the report, Councillor Kelcher asked members to note a correction to paragraph 3.4.3 of the report, correcting the tenure type of the 294 affordable housing units to '172 London Affordable Rent, 91 Intermediate, 31 Social Rent'. In correcting the paper, he confirmed that the overall total of 294 affordable homes secured through Section 106 Agreements was unchanged and this was a correction to the tenure description only.

Moving on to present the report, Councillor Kelcher began by taking the opportunity to highlight the way in which developments funded through the generation or use of

CIL could provide tangible community benefit to local residents, with the example provided across his ward in Harlesden on the use of CIL to bring the Picture Palace back into use alongside other investments for a new community centre, expanded youth offer at Roundwood Youth Centre, a Hair Academy and the refurbishment of the historic library. He advised that the Statement highlighted the scale of investment, with more than £150m of CIL allocated to current and pipeline projects across the borough over the reporting period. In outlining the impact, he reminded members that major infrastructure projects took many years to plan, fund and deliver, with funding held until the right project was available to residents in the long term.

In summing up, Councillor Kelcher advised that he was proud that the current administration had been robust in addressing the housing crisis through delivering development, expressing that Cabinet had always been clear that where development was done responsibly and delivered infrastructure needed by communities it would be supported.

In considering the report, Cabinet was pleased that the detailed paper demonstrated that the Council took its infrastructure funding obligations seriously and was transparent in its record of CIL investment. Members commended what was identified as Brent's strong performance in the collection of CIL receipts, recognising the effort required to ensure the funds came forward to the Council in a timely manner and in a way that could support the ongoing delivery of community benefits and infrastructure, with members citing the work which had commenced across Neasden as a further example of the positive impact that could be achieved as a result.

Having considered the statement and thanked officers for the work undertaken in collecting CIL to ensure the best outcomes and benefits from development for the whole of Brent, Cabinet **RESOLVED** to note the content of the report and approve the Brent Infrastructure Funding Statement 2024-26 for publication on the Council's website.

12. **West London Waste Plan Regulation 19 Consultation**

Councillor Promise Knight (Cabinet Member for Cleaner Streets, Transport and Public Realm) introduced a report from the Corporate Director Neighbourhoods and Regeneration presenting the new draft West London Waste Plan which it was noted would form part of the Local Development Plan and would be used for determining planning applications for waste development within Brent and across West London. and had been prepared jointly across the relevant six West London Authorities.

In presenting the report, Councillor Knight advised that the report called on Cabinet to approve the Plan to begin the final phase of consultation on the long-term strategic planning document that would ensure the six West London authorities had capacity to deal with the waste generated and took into consideration population increases and other changes which might impact waste in the medium term.

In detailing development of the Plan, Councillor Knight welcomed the collaboration with the other boroughs involved given the need to provide authorities with the necessary decision-making powers to determine the future of waste sites. The aim of the West London authorities was to reach a stage where the Plan could be

submitted for approval to the Secretary of State by year-end with thanks expressed to all involved for the substantial amount of work that had been put into developing the Plan.

Having noted the benefits of having a long-term framework to ensure the right infrastructure was in place for waste and recycling, Cabinet **RESOLVED:**

- (1) To approve the publication of the proposed submission version of the West London Waste Plan ('Regulation 19') and associated evidence base documents for consultation and consultation arrangements outlined in the accompanying report.
- (2) To delegate authority to the Head of Planning and Development Services (in consultation with the Corporate Director Neighbourhoods and Regeneration) to make minor modifications to the Proposed Submission version of the West London Waste Plan and accompanying documents prior to public consultation, including inserting any outstanding process or background elements, making presentational, typographical and accuracy amendments and finalising evidence base documents (in conjunction with other participating authorities).
- (3) To agree that the West London Waste Plan in its current form was 'sound' and therefore to recommend the Plan as such to Full Council in November and recommend that Full Council in turn authorise submission of the Plan and associated documents to the Secretary of State for examination, subject to the conclusion of the Regulation 19 consultation process and any suggested amendments to the Plan in response.

13. **Authority to Undertake a Trial of a Cross-Pavement Charging Solution for Electric Vehicles on the Public Highway**

Councillor Promise Knight (Cabinet Member for Cleaner Streets, Transport and Public Realm) introduced a report from the Corporate Director Neighbourhoods and Regeneration seeking Cabinet approval to a limited trial of cross-pavement charging solutions for electric vehicles on the public highway.

In presenting the report, Councillor Knight began by stating that the proposal took a practical step towards supporting residents who wanted to make the switch to electric vehicles. She noted that one of the biggest barriers to making that switch was the cost and convenience of electric vehicle charging, for example where residents did not have a driveway, which was particularly the case in Brent where many residents relied on on-street parking.

In detailing the purpose of the trial, Councillor Knight advised that it looked to understand whether on-street charging could work safely and effectively to the benefit of residents, and if the evidence showed that the solution was safe, practical and good value then the Council should be prepared to take it forward in more areas. Brent had already expanded its public charging network, and this trial provided another opportunity to see whether other approaches could benefit residents who did not have access to charging, which Councillor Knight felt reflected the type of evidence-based, practical approach that residents should expect from the Council.

In considering the report, Cabinet were supportive of the trial being taken forward, with members advising of the demand identified by residents wanting to make that switch but finding the transition difficult due to lack of driveways. In addition, members were keen to commend the trial as a means of seeking to adapt to the climate crisis with the Council keen to embrace new ideas and solutions in an open and innovative way in order to remain at the forefront of emerging opportunities.

In commending the approach and noting the funding received from the Department of Transport for up to 60 charging options across the borough, Cabinet
RESOLVED:

- (1) To approve the Council undertaking a trial of electric vehicle pavement channels to enable the Council to gauge the suitability of the technology and to establish suitable criteria / processes for possible wider deployment across Brent.
- (2) To approve the budget for the project, including all relevant costs, as set out in the report.

14. **Housing Damp and Mould Policy**

Councillor Robert Johnson (Cabinet Member for Housing, Homelessness and Renters) introduced a report from the Corporate Director Residents and Housing Services which presented Brent's new Damp and Mould Policy, including the Council's approach to combatting the prevalence of damp and mould in Council homes, the consultation and engagement findings, the commitments captured within the policy and progress made to enact those commitments, and how the Council would deliver and monitor the strategy's progress and impact.

In presenting the report, Councillor Johnson emphasised the serious impact damp and mould could have on residents' wellbeing and quality of life, particularly for young children, older adults and those with pre-existing conditions. The Damp and Mould Policy presented the Council's commitment to take a proactive, resident focused, zero-tolerance approach to damp and mould instances and ensured the Council was fully aligned to the requirements of Awaab's Law and reflected emerging best practice across the housing sector. In commending the policy, Councillor Johnson confirmed that the commitments placed strong emphasis on prevention, early intervention, effective communication and prioritising support to the most vulnerable residents, and established clear service standards, including response times for residents, providing greater assurance and accountability.

Further outlining the policy, Councillor Johnson affirmed that the Council recognised that inequalities could arise from poor housing conditions and therefore the policy committed to adopting a risk-based approach that targeted support where it was most needed, alongside robust monitoring arrangements with performance reporting to continually improve outcomes reflecting the level of cases being identified.

In summing up, Councillor Johnson confirmed that the policy focused on building trust with residents, listening to their concerns, responding swiftly to issues, and

ensuring everyone living in a Brent Council home could do so with confidence and dignity.

In considering the report and policy, Cabinet commended the approach adopted in seeking to tackle issues of damp and mould, recognising the welcome impact of Awaab's Law in placing legal obligations on landlords to address those issues robustly. In support of the policy, members were keen to recognise the way in which the Council had sought to respond to the legislation in seeking to reinforce the commitment towards raising standards for Brent residents. Members particularly noted the commitment to improved customer service and swift responses to reflect the standards residents should expect from the Council and emphasised the significant public health consequences that could arise from damp and mould. It was also welcomed that the policy made clear that the Council would not apportion blame or unfairly attribute damp and mould to residents' lifestyles and instead focused on providing safe, decent and sustainable homes.

Having commended the approach towards addressing damp and mould in a timely manner to ensure residents could live good quality lives in decent accommodation, Cabinet **RESOLVED** to endorse Brent's new Damp and Mould Policy.

15. **Corporate Performance Q4 2025/26 Performance Summary**

Councillor Gwen Grahl (Deputy Leader and Cabinet Member for Finance and Resources) introduced a report from the Corporate Director of Service Reform and Strategy presenting an end of year summary of Brent Council's performance across the Borough Plan for 2025-26.

In presenting the summary, Councillor Grahl began by acknowledging that, whilst areas for improvement remained, progress continued to be made in terms of the improvements in performance identified and number of indicators meeting their target particularly in relation to the services used and relied on residents on a daily basis.

Further detailing the improved performance, Councillor Grahl confirmed that data showed that the Cleaner, Greener Future priority ended the year with no red indicators. Road repairs were completed on time, fly-tipping clearance and enforcement was strong, recycling rates remained above target and household waste continued to fall. Longer-term progress was also being made with increased bike hangars and School Streets, improvements to Council homes and a 71.9% reduction in emissions from the Council's own estate and operations since 2010.

Other areas of improvement were detailed, including libraries which had welcomed more than 1.2m visits and issued 900,000 books and downloads; the reach of grants and resident forums / community programmes; the performance of Community Hubs; nearly 4,000 health checks delivered across more than 790 community health events by Brent Health Matters alongside new birth visits and reablement performing strongly which she highlighted reflected prevention in practice, bringing support into communities and building trust to avoid crisis. For children and young people, Family Wellbeing Centres continued to reach families across the borough, Brent Youth Parliament had exceeded expectations with education, employment and training outcomes for looked after children and care leavers having also improved. Whilst recognising the progress made, Councillor

Grahl acknowledged that there were areas requiring further focus with the Council aware of the issues to be addressed and open about the improvements required.

In summing up, Councillor Grahl felt that the report presented a Council that continued to deliver and perform despite the significant financial pressures identified as well as being an organisation that continued to learn, adapt and focus on results. She signalled that the upcoming Council Plan provided an opportunity to build on the progress made, break down silos and ensure resources were concentrated on areas that mattered most to residents.

Cabinet endorsed the 2025-26 performance report, commending the performance against Cleaner, Greener Future targets which reflected strong and sustained delivery across core environmental services and continued progress on long-term climate and active travel ambitions. They also welcomed the preventative strategy towards health and wellbeing which was supported by the Brent Health Matters programme.

In recognising the progress made and acknowledging the areas of focus going forward around housing indicators and Adult Social Care assessment timeliness and responsiveness, Cabinet **RESOLVED** to endorse the 2025-26 performance reporting set out in section 3 of the report.

16. **S75 Shared Funding Agreement between West and North London Integrated Care Board and Brent Council primarily related to the Better Care Fund**

Councillor Muhammed Butt (Leader and Cabinet Member for Adult Social Care) introduced a report from the Corporate Director Service Reform and Strategy informing Cabinet of the proposal to enter a partnership arrangement, under Section 75 of the National Health Service Act 2006, in respect of the delivery of the approved Better Care Fund (BCF) Plan with West and North London Integrated Commissioning Board (WNL ICB) for 2026-27.

In presenting the report, Councillor Butt began by highlighting that, whilst the report was focused on the governance arrangements of the BCF, it also highlighted how the system would work together, using the pooled budget of £57m, to deliver the best outcomes for residents and tackle health inequalities, drive forward prevention, strengthen neighbourhood working initiatives, reduce hospital admissions and ensure care was organised around the needs of residents rather than organisational boundaries. The importance of ensuring pathways were in place for residents when they were discharged from services was emphasised, ensuring there was an integrated approach to deliver the outcomes that the Council hoped for residents.

In noting the governance arrangements for the BCF going forward and commending the joint working approach towards delivering integrated care services, Cabinet **RESOLVED**:

- (1) To approve the proposal to enter a new partnership arrangement under Section 75 of the National Health Service Act 2006 with the West and North London Integrated Care Board for the delivery of the approved Better Care Fund Plan for 2026-27, with a total pooled budget value of £57,025,104.00, as detailed in Appendix 1 of the accompanying report.

- (2) To delegate authority to the Corporate Director Service Reform and Strategy, in consultation with the Cabinet Member for Adult Social Care, to extend the agreement referred to in (1) by such period, or periods, as were considered appropriate, up to a maximum of 4 years with such extensions to conclude by 31 March 2031.
- (3) To delegate authority to the Corporate Director Service Reform and Strategy, in consultation with the Corporate Director Finance and Resources, to make annual financial contributions to the Better Care Fund budget for subsequent financial years, provided there is no substantial change to the Agreement.

17. **West London Fostering Recruitment and Retention Programme**

Councillor Jake Rubin (Cabinet Member for Children's Services, Employment and Climate Action) introduced a report from the Corporate Director Children, Young People and Community Development seeking approval for the Council to enter into a new, updated Collaboration Agreement in respect of the West London Regional Fostering Recruitment Hub along with Ealing, Hammersmith and Fulham, Harrow, Hillingdon, Hounslow, Kensington and Chelsea and Westminster Council's.

In introducing the report, Councillor Rubin expressed his view that one of the most important areas of the Council's work was to provide care and support to its looked after children, of which there were just under 300 in Brent. He advised that the paper responded to some of the challenges in recruiting and retaining foster carers, the main challenge being that the independent sector was, at times, better resourced to market themselves and provide higher payment to foster carers.

In detailing the rationale for the proposal, Councillor Rubin affirmed Brent's aim to provide foster carers in-house wherever possible, in order to provide greater oversight and establish a better connection to the borough and community amongst foster carers. The new agreement would give a greater role to the West London Fostering Hub, which Brent was already part of with 8 other boroughs, in relation to the recruitment of and, on occasion, the approval of foster carers, with a more end-to-end process in terms of the assessment and training of new carers. He added that the agreement aligned with the Department for Education's ambition for regional fostering hubs and therefore asked Cabinet to approve the new and updated agreement and associated recommendations outlined in the report.

Cabinet thanked Councillor Rubin and officers for the report and took the opportunity to place on record their appreciation for Brent's foster carers, who they felt delivered an excellent service on behalf of young people in the borough. The Government's ambitions in tackling the challenges faced in recruiting foster carers was also welcomed with it recognised that housing, or a lack of available room, remained one of the main contributing factors impacting on the number of individuals and families coming forward to foster.

In once again thanking foster carers for their contribution to Brent, Cabinet
RESOLVED:

- (1) To enter into a new and updated Collaboration Agreement in respect of the West London Regional Fostering and Recruitment Hub.

- (2) To delegate authority to the Corporate Director Children, Young People and Community Development, in consultation with the Corporate Director Finance and Resources, to finalise the terms of the Collaboration Agreement.

18. **Exclusion of Press and Public**

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

19. **Any other urgent business**

There were no items of urgent business.

The meeting ended at 11.12 am

COUNCILLOR MUHAMMED BUTT
Chair

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List of Petition(s) to be presented at Cabinet - 7 September 2026

(1) Opposition to installation of perimeter fencing College Green Open Space

**Lead Petitioner – James Hogan – Chair College Green Preservation Society
(petition contains 80 signatures)**

Statement:

We the undersigned local residents petition Brent Council to stop College Green Nursery School NW10 3PY erecting a screen, living wall or any structure on the perimeter fence of College Green, the open space at the top of College Road, Kensal Rise, which would block any view of the open space enjoyed by local residents for the last hundred years and would completely destroy the pleasant character of the area. Such a screen would also create a major road safety hazard at a very busy junction. The open space has been used by the 28th Willesden Scout Group for 60 years from 1967 and is a vital part of the character of the area. The College Green Preservation Society founded in 1988 has over four decades preserved College Green as an open space. In 1995 we proposed that Doyle Nursery School on College Road should move to College Green in order to protect the open space. The open space is used by the scouts and the nursery and has never been part of the nursery's property. It is an important part of the community and should not be hidden from view by any screen, living wall or any other structure.

There is also an All Souls College Covenant which is part of the deeds of the surrounding houses, which legally protects the householders' rights, stating that the above mentioned land cannot be used for "any purpose which shall or may be or grow to be in any way a nuisance, damage, grievance or annoyance to the Vendors or their assigns or the lessees or tenants of any part or parts of the Estates of the Vendors in the neighbourhood or which may tend to depreciate or lessen the value of the aforesaid estates of the Vendors or any part or parts thereof as residential property."

College Green Nursery School have already erected an additional fence across the open field, which is having a negative effect on Scout activities. The open field is not and never has been part of the nursery school property. If the nursery school want to screen their property that is up to them but they have no right to screen the open field, which does not belong to them and is an open space used by the Scouts, enjoyed by the local residents and is a vital aspect of the character of the area.

Local residents have over the last forty years stopped houses being built on the open space. The College Green Preservation Society, formed in 1988, proposed in 1995 that Doyle Nursery School move to College Green for the sole purpose of preserving the open space, which it did in 2004. It was agreed that the open space should be used by BOTH the Scouts and the nursery. If the screen goes up we will no longer be able to see the beautiful view across the field to the magnificent oak tree planted by the Scouts in 1967. It will be like living next to a builder's yard. The screen will also completely block the present sight-line, which allows drivers of lorries and cars to have a clear view from a distance of children, parents and other pedestrians as they approach and cross the junction of College Road and Leighton Gardens. This will create a major road safety hazard at a very busy junction. This proposed land-grab is

extremely concerning and is a betrayal of the trust and hope of the local residents over many decades that the open space and view would be preserved forever.

	Cabinet 7 September 2026
	Report from the Corporate Director of Residents and Housing Services
	Lead Member - Cabinet Member for Housing, Homelessness & Renters (Councillor Robert Johnson)
Brent's Gypsy, Roma & Traveller Framework and Action Plan 2026-2030	

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
List of Appendices:	Two Appendix A: Draft Brent Gypsy, Roma & Traveller Framework and Action Plan 2026 - 2030 Appendix B: Brent Gypsy, Roma & Traveller Framework Equalities Impact Assessment
Background Papers:	Previous Brent Gypsy, Roma and Traveller Inclusion Strategy 2009 - 2014
Contact Officer(s): (Name, Title, Contact Details)	Spencer Randolph, Director Housing Services 020 8937 2546 Spencer.randolph@brent.gov.uk Grace Hall, Policy and Performance Manager 020 8937 1471 Grace.Hall@brent.gov.uk

1.0 Executive Summary

- 1.1. This report sets out Brent's new Gypsy, Roma and Traveller Framework and Action Plan (see Appendix A). It sets out the commitments that Brent Council makes to supporting its Gypsy, Roma and Traveller communities and how it will deliver and monitor progress and impact. The Framework has been informed by engagement with Gypsy, Roma and Traveller communities – a summary of consultation and engagement findings is included within the draft Framework. A detailed Action Plan will sit alongside the Framework to ensure that the Council is delivering on its commitments to Gypsy, Roma and Traveller communities.

- 1.2. The Framework is categorised into a series of priorities and commitments, which respond to the disproportionate outcomes experienced by these communities. Underpinning the commitments is addressing the need to build better relationships with and understanding of these communities.
- 1.3. While the Framework is primarily focused on the Gypsy and Traveller communities, it also provides an important opportunity to strengthen our understanding of Brent's Roma community. As part of the Framework, we will build a richer evidence base, improve our insight into the community's needs and strengths, identify and support community leaders, and develop sustainable channels for ongoing engagement between the Roma community and key partner agencies.
- 1.4. It is proposed that delivery of the Framework is monitored through a detailed annual action plan, which is coordinated through the Resident and Housing Services Equity, Diversity and Inclusion Group and reported to Cabinet annually.

2.0 Recommendation(s)

Cabinet are asked to:

- 2.1 Approve Brent's new Gypsy, Roma and Traveller Framework and Action Plan 2026-2030 (see Appendix A).

3.0 Detail

3.1 Cabinet Member Foreword:

- 3.1.1 At Brent, we're proud of our diversity and commitment to inclusion for all our communities. Our Gypsy, Roma and Traveller communities are an important part of that, yet too often these communities haven't been heard and have been under-served. It has been more than a decade since Brent has had a dedicated set of commitments for how we'll work with and support our Gypsy, Roma and Traveller communities. It's important that we now put in place a clear Framework and Action Plan that reflects both our responsibilities and commitment to ensuring that no community is left behind.
- 3.1.2 Gypsy, Roma and Traveller communities, and in particular Gypsy and Traveller communities, have been clear about their needs and aspirations. The draft Gypsy, Roma and Traveller Framework and Action Plan reflects and responds to these needs and aspirations. While the Framework is primarily focused on Gypsy and Traveller communities, it also includes a commitment to strengthening our relationship with Roma communities. Through improved engagement, deeper insight and closer partnership working, we will build our understanding of the community's strengths, experiences and priorities, enabling us to respond more effectively to their needs and aspirations.

- 3.1.3 The Framework and Action Plan is focused on improving site conditions and service delivery for Gypsy, Roma and Traveller communities. But at its core, it is about building stronger and more sustainable relationships. We have made early progress through closer engagement with residents, appointing dedicated liaison roles, and working alongside trusted organisations to improve communications. There is more we can do to continue to rebuild trust and ensure services are responsive to community needs.
- 3.1.4 The new Framework and Action Plan, contributes most directly to the Borough Plan's Thriving Communities Strategic Priority but will also touch upon every strategic priority. This is because the commitments and activities across the Borough Plan's priorities align with supporting the needs of and improving the outcomes experienced by Brent's Gypsy, Roma and Traveller communities. The Framework and Action Plan also relates to Brent's Equity, Diversity and Inclusion Strategy, which encompasses commitments to tackling inequality and supporting marginalised groups, and the Local Plan, which outlines our current approach to Gypsy and Traveller accommodation in Brent.

3.2 Background

- 3.2.1 Brent's new Gypsy, Roma and Traveller Framework and Action Plan is the Council's latest strategic document for these communities in over a decade. The Framework and Action Plan marks a reset around how we will work with and support Gypsy, Roma and Traveller communities. It outlines how we have learned from and will rectify mistakes made with our Gypsy and Traveller community. It sets out the work we will continue to do to build trust with these communities, and how we will ensure that our service delivery reflects the unique needs of these communities. It is informed by consultation and engagement with Gypsy, Roma and Traveller communities.

Consultation and engagement findings

- 3.2.2 Overall, officers are satisfied with the quality of engagement and feedback received during the consultation window. We commissioned the Traveller Movement to co-deliver the consultation which was undertaken over 10 weeks (September – November 2025), using mixed methods. Details around the consultation's approach and findings are captured within the Framework, but broader, contextual observations that may be of interest to Cabinet include:

- **Gypsy & Traveller community focus groups.** We organised two focus groups to supplement door knocking and a survey, but unfortunately there was no attendance. We suspect this was due to:
 - Gypsy and Traveller preference to be engaged in their place.
 - Engagement fatigue – our communication and engagement with the community has increased significantly over the last year. While this has been necessary, we may be reaching a point where the community are feeling that we have over-engaged them.
 - Community allegiance to different Gypsy and Traveller advocacy groups. Community elders expressed to other community members that they will not attend our focus groups, planned with the Traveller

Movement, due to their allegiance to and relationship with London Gypsies and Travellers.

These factors will be acknowledged for any future community engagement.

- **Limited Roma community engagement.** We commissioned the Romanian and Eastern European Hub (RO-EE Hub) to deliver a focus group with Brent's Roma community. This comprised of only 10 Romanian Roma women. This is only a small sub-section of our Roma community which, anecdotally (via insights from the Roma Support Group and community experts), also comprises Polish, Bulgarian and Slovakian nationals. The Census records that Brent has the third largest Roma population in England and Wales, yet we still know very little about the community's make up and needs. This is why the Framework only has one commitment to the Roma community: "Develop a Roma community engagement plan". Through discussions with experts and partners this plan will focus on:
 - Building a quantitative evidence base – the Census lacks the robustness to produce reliable information about the makeup of Brent's Roma community. The community can be reluctant to share their ethnicity, particularly for official records, therefore we need to compile and combine several quantitative sources that are updated more frequently, such as NHS, Schools and EU Settlement Scheme data.
 - Building relationships and maintaining a frequent dialogue – the quantitative evidence base will help us understand the community make up but discussions with the community will enable us to delve into their needs and uniqueness. We will seek to engage and build a relationship with the community through routes suggested by experts, particularly at places of worship.
 - We want to reach a place where we have identified Roma community leaders in the borough and have establish mechanisms for consistent engagement.

The Framework's priorities and commitments

3.2.3. The Framework contains three priorities, each of which is supplemented by a series of specific commitments to our Gypsy, Roma and Traveller communities (noting that the Framework is mainly focused on Gypsy and Traveller communities due to limited Roma community insights). The priorities are:

- **Providing safe and suitable sites** – focusing on maintaining our Gypsy, Roma and Traveller site; establishing a new Pitch Allocation Policy; and working towards securing a new site(s).
- **Building strong, sustainable relationships** – focusing on how we will build trust with Gypsy, Roma and Traveller communities and relevant partners.

- **Delivering accessible services** – focusing on how we will deliver more culturally appropriate services for these communities.

Delivering and monitoring the Framework

- 3.2.4 Once finalised and approved, the Resident and Housing Services Equity, Diversity and Inclusion Group will oversee the Framework's delivery via a detailed action plan, which will be reported on to Cabinet annually. Once finalised and approved, the Resident and Housing Equity, Diversity and Inclusion Group will oversee the Framework's delivery via a detailed action plan, which will be reported on to Cabinet annually. As part of this we will identify whether there are any suitable KPIs that can be included to monitor progress, though it should be noted that at this stage data quality around these communities remains poor. As this Framework is delivered, we anticipate our data and insight around the size, makeup of and outcomes for these communities will improve.

Next steps

- 3.2.5 Subject to Cabinet's approval of the draft Framework, the final version will be produced in a designed format. Work will also be undertaken to develop a detailed Action Plan to sit alongside the Framework.

4.0 Stakeholder and ward member consultation and engagement

- 4.1 As captured within the Framework (see Appendix A), we delivered a consultation which received feedback from a range of stakeholders, including Gypsy, Roma and Traveller community members. The feedback has been central in shaping the Framework's priorities and commitments.
- 4.2 As noted above, our engagement with Roma communities has been limited. There is further work for us to do to build relationships with this community.
- 4.3 A briefing session for Members was held on 22 July. The purpose of this session was to update Members on the engagement that has taken place with Gypsy, Roma and Traveller communities and to get their input into the new Framework ahead of its submission to Cabinet.

5.0 Financial Considerations

- 5.1 In September 2025 Cabinet endorsed the use of up to c. £500k capital investment from 2026/27 through the usual capital governance process (Capital Programme Board and Cabinet) for Lynton Close site improvements as part of the improved approach to site management.
- 5.2 There are no direct financial implications arising from this report in relation to the Gypsy, Roma and Traveller Framework 2026–2030.

6.0 Legal Considerations

- 6.1 Under the Public Sector Equality Duty under section 149 of the Equality Act 2010, the council is, in the exercise of its functions, to have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between persons who share a relevant protected characteristic and persons who do not share it. This includes having due regard to the need to:
- (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic.
 - (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
 - (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 6.2 The Act generally does not define race, however case law has established, for example, that Roma Gypsies and Travellers are covered by the protected characteristic of race for the purposes of the Equality Act 2010.
- 6.3 Whilst any duties under the Equality Act 2010 does not necessarily outweigh the need to consider factors such as environmental protection, the amenity of others and/or the use of the land, the authority is required to have due regard to its equalities duties when making decisions that involve and possibly impact on Roma Gypsies and Travellers.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 Gypsy, Roma and Traveller communities are protected groups and their experiences of marginalisation, discrimination and disadvantage are well reported at national and local levels. Currently, Brent outlines its commitment to support marginalised groups - through tailoring service delivery and tackling inequality - within the Equity, Diversity and Inclusion Framework 2024-28; however, we are now going beyond this for Gypsy, Roma and Traveller communities.
- 7.2 This report shares Brent's new Gypsy, Roma and Traveller Framework which puts forward specific commitments to better work with and support our Gypsy, Roma and Traveller communities. An EIA has been completed (see Appendix D) as part of the Framework's development and captures how it will result in more positive outcomes for these communities.

8.0 Climate Change and Environmental Considerations

- 8.1 There are no climate change and environmental considerations for this report.

9.0 Communication Considerations

- 9.1 The Framework and Action Plan will be added to [the Gypsy, Roma and Traveller page on Brent Council's website](#).
- 9.2 It is intended to mark the publication of the Framework with a press release to local media and a news story on the Council's website.
- 9.3 The Housing Engagement team will also arrange for news of the publication of the Framework, as well as any relevant commitments, to be communicated directly to consultation participants, stakeholders and established channels into local Gypsy, Roma and Traveller communities. The Engagement Plan committed to within the Framework will ensure improved targeted two-way communication with Gypsy, Roma and Traveller communities, and will also be led by the Housing Engagement team.

Related document(s) for reference

[Developing a new Brent Gypsy, Roma & Traveller Strategy](#) – Cabinet paper, September 25

Report sign off:

Thomas Cattermole

Corporate Director, Residents and Housing Services

Legal considerations provided by:
Pameel Crowther-Newman

Finance considerations provided by:
Mohammed Ali Shah

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Brent

London Borough of Brent

Gypsy, Roma and Traveller Framework and Action Plan

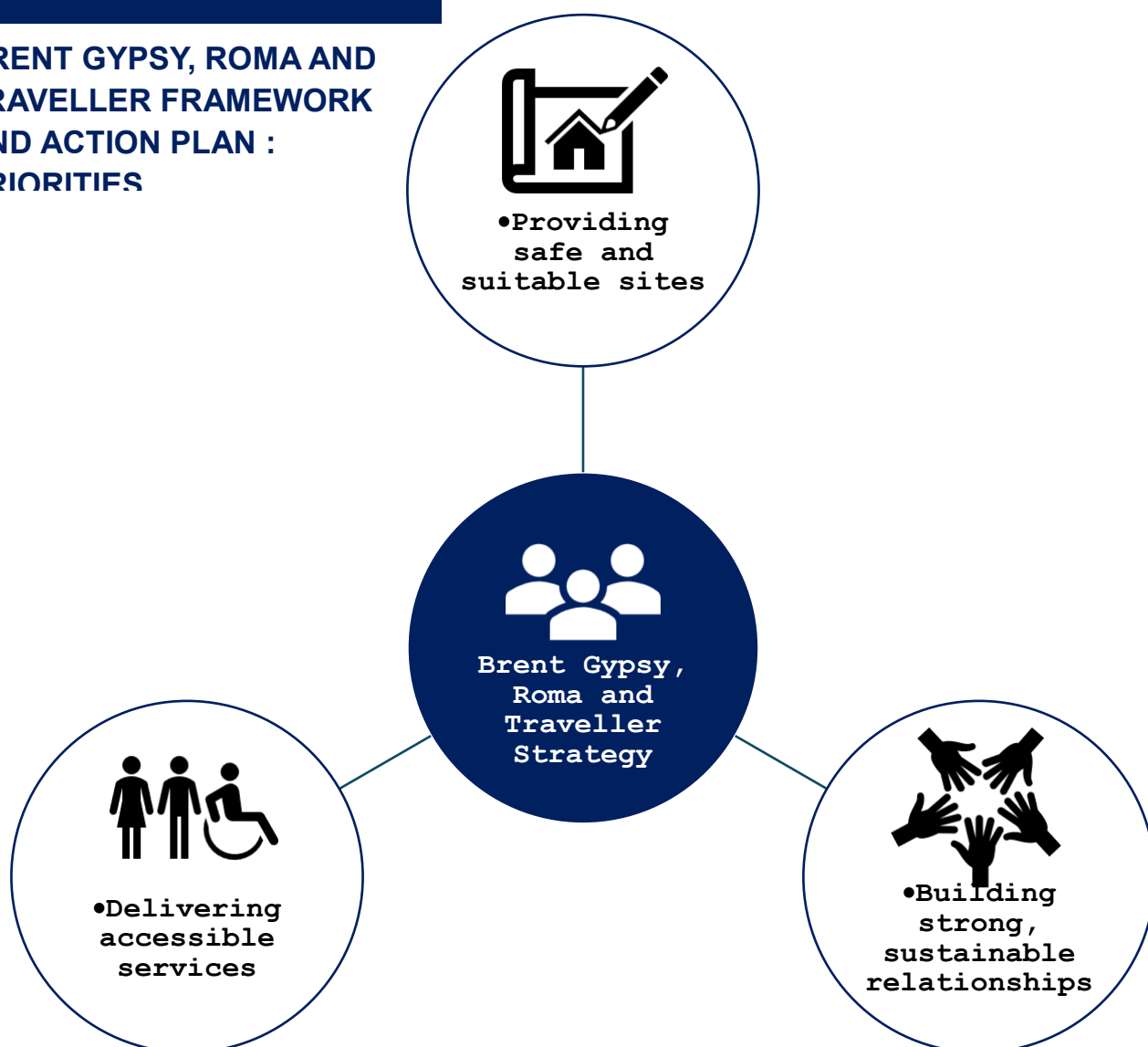
2026-2030

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BRENT GYPSY, ROMA AND TRAVELLER FRAMEWORK AND ACTION PLAN : PRIORITIES



Foreword

Brent is a unique borough, home to residents from all over the world who have chosen to build their lives, families and futures here. Our diversity is one of our greatest strengths, and we are committed to making Brent a place where every community feels respected, included and able to access the support they need.

This includes our Gypsy, Roma and Traveller communities, who are an important part of Brent's identity and history. We recognise that our Gypsy, Roma and Traveller communities continue to face significant challenges, including discrimination, poor access to services, unsuitable accommodation and a lack of trust in public institutions.

This Framework and the Action Plan that will sit alongside it sets out how we will work with our Gypsy, Roma and Traveller communities, partners and services to improve outcomes. It focuses on three priorities: providing safe and suitable sites, building strong and sustainable relationships, and delivering accessible services.

We know that trust cannot be built through words alone. It requires honest engagement, consistent action and a willingness to listen, learn and do things differently. This Framework and Action Plan is an important step, and we are committed to working with Gypsy, Roma and Traveller communities to make sure it leads to meaningful and lasting change.

Cllr Robert Johnson

Cabinet Member for Housing, Homelessness and Renters

Introduction

The council's new Gypsy, Roma and Traveller Framework and Action Plan outlines our ambition to ensure Brent's Gypsy, Roma and Traveller communities are appropriately supported to thrive and the actions that we will take to deliver on that ambition.

This Framework and accompanying Action Plan reflects the journey the council is undertaking to improve the quality of our support for and establish sustainable relationships with these communities. We recognise that we have not done enough to meet these communities' needs in the past but, by delivering this Framework and Action Plan, we will reach a place where their needs are met and the council is viewed as a trusted public organisation.

Brent is a borough abundant in cultures, which is why we fiercely and unapologetically champion diversity as the borough's greatest strength and are dedicated to helping our residents to live their best lives. This is reflected in our [Borough Plan 2023-2027 ambitions](#), as we commit to supporting thriving communities that are empowered and celebrated; and our [Equity, Diversity and Inclusion Strategy](#) that focuses on establishing an inclusive borough where everyone belongs, including our Gypsy, Roma and Traveller communities.

Brent's Gypsy, Roma and Traveller communities

Brent has longstanding Gypsy, Roma and Traveller communities. We have one permanent traveller site in Stonebridge which was established in 1997. According to the Census, Brent's Roma community is concentrated in the south, east and north of the borough, namely: Willesden Green, Harlesden & Kensal Green, Dollis Hill, Queensbury and Welsh Harp.

It is difficult to quantify Brent's Gypsy, Roma and Traveller population. The [Census 2021](#) is one of the most reliable sources although we believe the figures are under-representative:

	Brent	London	England & Wales	Brent's national ranking (out of 331)
White Gypsy or Irish Traveller	237	7,031	67,768	226
White Roma	2,520	37,689	100,981	3

Romani (Gypsy), Roma and Traveller (Irish/Scottish Traveller) communities are not homogenous – they are distinct, each with their respective heritage, culture and needs. These communities' diversity and uniqueness is captured well in a [recent report from the Traveller Movement](#). Gypsy, Roma and Traveller communities' groups commonly comprise of:

- Romani Gypsies (Gypsy), including English Gypsies, Scottish Gypsy/Travellers, Welsh Gypsies and other Romany people.
- Roma, who originate from areas of India and are the largest ethnic minority in Europe. Many Roma are migrants from countries in Central and Eastern Europe.
- Irish Travellers, who have specific Irish roots. Travellers can also encompass groups that travel, including, but not limited to, New Travellers, Boaters, Bargees and Show people.

Gypsy, Roma and Traveller communities are recognised as protected ethnic groups under the Equality Act 2010, which means the council has a responsibility to recognise and support their culture and way of life, helping to tackle any discrimination that they experience. As far as possible, the council recognises and refers to these communities as respective groups. In some instances, particularly in relation to existing data and insights, the strategy may refer to Gypsy, Roma and Traveller communities in different ways or as a collective – this is solely due to how data is collected and presented by other bodies and organisations. Our insights around these communities are limited, therefore we need to rely on the range of different types of information available.

Gypsy, Roma and Traveller outcomes in Brent: what the data tells us

Nationally, Gypsy, Roma and Traveller communities experience some of the lowest outcomes. Unfortunately, this is also reflected within the Brent context. Our aspiration is to work with these communities to improve these outcomes.



Age¹

Brent has a young Gypsy, Roma and Traveller population, with average ages lower than the Brent average:

- Brent population, median age: 35
- Brent White Gypsy and Irish Traveller population, median age: 27
- Brent White Roma population, median age: 32

¹ Census 2021



Education, Health and Care Plan²

- Twice as likely to have an EHCP compared to the Gypsy, Roma and Traveller national average
- Three times as likely to have an EHCP compared to the Brent pupil average



Special Educational Needs (SEN) support³

- More likely to have SEN support when compared with the Gypsy, Roma and Traveller national average
- Twice as likely to have SEN support when compared with the Brent pupil average



Grade attainment⁴

- Poorer outcomes compared to the Gypsy, Roma and Traveller national average across Early Years, Phonics Trend and Key Stage 2
- Better outcomes compared to the Gypsy, Roma and Traveller national average for Key Stage 4



Health⁵

- Compared to the Brent average, residents at Lynton Close (Brent's permanent traveller site) have higher rates of multiple long-term conditions, anxiety, depression and learning disability.
- Brent's wider Gypsy, Roma and Traveller communities have had fewer GP visits, but higher hospital admissions compared with the rest of Brent.



Economic activity⁶

- Brent's White Roma population has one of highest employment rates across all ethnic groups in the borough, ranking 2nd at 77%.
- The Roma population is twice as likely to be self-employed compared to the Brent average.
- Brent's Gypsy and Irish Traveller population has the lowest employment rate at 40%.

² Brent Council data

³ Brent Council data

⁴ Brent Council data

⁵ NHS NWL Whole Systems Integrated Care data, 2024/25

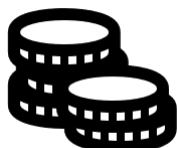
⁶ Census 2021



Qualifications⁷

Brent's Gypsy, Roma and Traveller communities are among the least qualified ethnic groups in the borough:

- Brent White Gypsy and Irish Traveller population: 61% have no qualifications, ranking the lowest.
- Brent White Roma population: 27% have no qualifications, ranking 3rd lowest.



Deprivation⁸

Lynton Close, Brent's Gypsy, Roma and Traveller site, is in the top 1% of the most deprived neighbourhoods in England.

How we developed Brent's Gypsy, Roma and Traveller Framework and Action Plan

To shape this Framework and Action Plan, we engaged with residents, particularly those from Gypsy, Roma and Traveller communities, to understand their ambitions for themselves and their expectations of the council. The consultation focused on three themes:

1. General issues related Gypsy, Roma and Traveller communities and improving access to support services
2. A new Pitch Allocation Policy: how permanent and temporary pitches are allocated
3. Site designs and features

To conduct the consultation and engagement, we worked with the Traveller Movement (to engage with Gypsy and Traveller communities) and the Romanian and Eastern European Hub (RO-EE Hub) (to engage with Roma communities). Overall, we adopted mixed methods, recognising that we are engaging with seldom heard groups that will have different engagement needs and preferences. As the consultation focused on marginalised groups, we also delivered sessions and engagement that was designated for specific groups only to ensure they felt they were in a comfortable and safe space.

More detail on the consultation and engagement activity that we undertook, and key findings from it, are set out in **Appendix A**.

Our priorities for Brent's Gypsy, Roma and Traveller communities

We want our Gypsy, Roma and Traveller communities to thrive. We recognise their uniqueness, particularly in relation to their identity and needs, and the importance of tailoring the way we engage, work with and support them. This is not limited to our statutory responsibilities; this is also about delivering the right support that addresses their needs.

Our priorities are grounded in our responsibilities with the Equality Act 2010 and Public Sector Equality Duty, which recognises Gypsy, Roma and Traveller communities as ethnic minorities, and government guidance that outlines how to support their way of life.

The core priorities in the Framework are:

⁷ Census 2021

⁸ Indices of Multiple Deprivation 2025

- **Providing safe and suitable sites**
- **Building strong, sustainable relationships**
- **Delivering accessible services**

An Action Plan will sit alongside the Framework and set out the specific actions that the council will take to deliver on these priorities.

Providing safe and suitable sites

Brent currently has one dedicated Gypsy, Roma and Traveller site at Lynton Close which has been active since 1997 and under the council's management since 2017. This is a permanent site that consists of 31 pitches.

A core council responsibility to Gypsy, Roma and Traveller communities is to provide designated sites that accommodate their way of life. Our first priority is to provide safe and suitable sites. Within this, we commit to:

1. Providing well maintained sites
2. A clear and fair way to allocate pitches: developing Brent's Pitch Allocation Policy
3. A vision for future sites: meeting the communities' accommodation needs
4. A transparent way to respond to unauthorised encampments

Commitment	Detail
1. Providing well maintained sites	We will: • Conduct a full site survey and establish an improved maintenance and repair log at Gypsy, Roma and Traveller sites – we will conduct a comprehensive site survey that will inform an updated log of all maintenance and repair needs. The survey will act as a base to understand the scale of activity required and help establish targets for completed maintenance, ultimately with the aim of getting reported issues as close to zero as possible. The maintenance and repair needs will be delivered through an action plan that will be reviewed on a monthly basis. • Improve communications around the status of maintenance and repairs – while our goal is to address issues as quickly and effectively as possible, we will also improve how we inform residents around the status of maintenance and repairs in a way that is accessible. The approach around this will form part of the new Lynton Close Engagement Plan (detailed in the 'Building strong, sustainable relationships' priorities). • Invest £500k into site improvement – this was committed by Cabinet in September 2025 to be used from 2026/27. We will consult with Lynton Close residents around how best to invest into site improvements
2. A clear and fair way to allocate pitches: Brent's Pitch Allocation Policy	We will: • Develop a new Pitch Allocation Policy – we are undertaking work to develop a new Pitch Allocation Policy that will ensure pitches are allocated fairly, consistently and transparently. Our Policy will be shaped by comprehensive feedback from Gypsy and Traveller communities and draw on best practice. It will capture a range of components, including eligibility criteria, priority banding, assessment and application processes, to establish clarity and consistency for pitch allocations. We will periodically review the demand for pitches, the effectiveness

	of the allocation process and any changes in policy or legislation that may impact provision. • In September 2025 we committed to reduce our pitch rent to the London average for similar sized pitches – this change will be backdated to 8 September 2025. This change marks our recognition that our rates were too high, therefore we have adopted a fairer rate which we hope will reduce households' living costs and support their livelihoods. We have: • Established a small team of officers who act as central points of contact for those living on Gypsy and Traveller sites. This team directly manages the current, and any future sites and delivers all aspects of high-quality, visible and accessible site management, end to end and let to re-let. The team aims to ensure these communities have access to financial inclusion and support, can meet their rental obligations and live in good quality, safe, suitable and affordable homes.
3. A vision for future sites: meeting the communities' accommodation needs	We will provide more homes for our Gypsy, Roma and Traveller communities. Currently, Brent does not have enough pitches to meet the communities' needs, or the most recently assessed housing demand. Brent's sole site, Lynton Close, is overcrowded which is exacerbating health and safety issues for the tenants. While we are taking steps to mitigate overcrowding, including reducing fire risk and providing alternative accommodation for those households willing to relocate to bricks and mortar, the longer-term challenge still remains. When Brent's Local Plan 2019-2041 was adopted in 2022, the West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2018 determined that no additional sites were required. However, in 2024 the national definition of Gypsies and Travellers for planning purposes, which was used in this assessment, was found discriminatory and unlawful, resulting in an underassessment of accommodation needs. Our latest assessment determines that Brent requires an additional 52 pitches to meet the communities' housing needs – there is only one site in Brent of 31 pitches, therefore we must secure more. This, combined with the need to tackle the existing overcrowding, is why Brent commits to securing a new Gypsy, Roma and Traveller site(s) that is safe, secure and suitable for the communities' needs. We have established several design principles which will guide how we will seek to identify and develop future sites. These have been shaped by external expert advice, residents' voices, learning from our management of Lynton Close, criteria outlined in the Local Plan and best practice: 1. Vehicle access: Ensuring sites have appropriate vehicle access, parking, and servicing, including direct road access for larger vehicles. 2. Access to services: easily accessible to essential services such as schools, healthcare facilities, and shops. 3. Site size: Develop new sites with pitch numbers that are in line with best practice. 4. Child-friendly spaces: Providing child-friendly sites with safe spaces to play. 5. Community spaces: Easy access to community spaces and buildings. 6. Key utilities: water, electricity, drainage, and waste disposal. There is considerable work to do to deliver future sites. Through this journey we will ensure that any new sites are designed and delivered thoughtfully using best practice, codesign and consultation.

4. A transparent way to respond to unauthorised encampments	Our unauthorised encampments policy We aim to have an effective and fair approach to the management of unauthorised Gypsy, Roma and Traveller encampments that balances these communities' rights with the available space and capacity within Brent to accommodate their needs. Brent's approach to unauthorised encampments is driven by government guidance, which amplifies the importance of flexibility and care. The approach focuses on two possible routes: Section 61 Notice and serving a Section 77 Notice. Our policy is that the most appropriate legal route will be used depending upon the specific circumstances of the case. These routes mostly mirror those that have been agreed across local authorities within the West London Waste Authority to ensure there is consistency: • London Borough of Brent • London Borough of Ealing • London Borough of Harrow • London Borough of Hillingdon • London Borough of Hounslow • London Borough of Richmond upon Thames More information on how the council and police can respond to unauthorised encampments, including the use of Section 61 and Section 77 notices, can be found in Appendix B.
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Building strong, sustainable relationships

Building strong, sustainable relationships with Gypsy, Roma and Traveller communities is imperative. These communities are marginalised, underserved and experience some of the poorest outcomes in the country; yet they are distrusting of public authorities which is often due to historic experiences and neglect. We want to support our Gypsy, Roma and Traveller communities to thrive, but we know the council, partners and these communities must build mutual trust, respect and collaboration to achieve this. As this trust builds, we will be able to establish better tailored and culturally informed services that meet these communities' needs more effectively. Our commitments within this priority are to:

1. Continue improving our relationship with Gypsy and Traveller communities
2. Develop a Roma community engagement plan
3. Continue working with trusted organisations that understand Gypsy, Roma and Traveller communities

Commitment	Detail
1. Continue improving our relationship with Gypsy and Traveller communities	We have made progress on improving our relationship with our Gypsy and Traveller communities, particularly those residing at Lynton Close. To build on this we will: • Position the new dedicated site support as community advocates – as previously referenced, we have established a small team of officers who will act as central points of contact for those living on Gypsy, Roma and Traveller sites. Beyond site related issues, this team will support and advocate for residents on any additional needs. If the team cannot deliver the support themselves, they will liaise and signpost to relevant services and partners to ensure these communities can access the support they need. • Maintain a Lynton Close Engagement Plan – recent engagement activities have provided valuable insights into community needs and informed the development of tailored communication and engagement methods. The Lynton

	Close Engagement Plan will establish a consistent and structured approach to communication, ensure alignment with the commitments set out in this Framework and accompanying Action Plan (such as communications around site maintenance), and provide a forward-looking framework for ongoing engagement. It will also support the timely dissemination of information to these communities regarding wider council and borough developments and opportunities. Core principles underpinning this activity are to listen, embed clear feedback loops and empower Gypsy and Traveller communities to drive conversations and solutions that will support them to thrive. We also recognise the importance of avoiding engagement fatigue. While we have established the foundation for a renewed relationship with these communities, we know there's a long way to go to build trust. We also know there is more to understand about these communities, particularly so that we can provide appropriate and tailored support. Establishing a better relationship and understanding of these communities has been a recent priority for the council, however this comes with the risk of over-engaging which can potentially damage relationships and affect the willingness to participate. Both the new dedicated team and engagement plan will play an important role in managing engagement with these communities to ensure it is appropriate and proportionate.
2. Develop a Roma community engagement plan	The Census suggests Brent is home to one of the largest Roma communities in the country, so it is vital to ensure this community feels welcome and supported within the borough. Despite our attempts, engagement with the Roma community to develop this Framework and Action Plan was limited and, therefore, our understanding of the community in Brent remains inadequate. Because of that, we cannot confidently establish a series of commitments to the Roma community, but we do commit to developing an engagement plan that will build our understanding of the Roma communities' diversity and make-up in Brent and those communities' respective needs. The engagement plan will seek to: • Understand the make-up of Brent's Roma community • Build an understanding of the different Roma community needs and a foundation for tailored service provision • Identify Roma community leaders and trusted voices in Brent • Establish a mechanism for maintained dialogue with the Roma community We do not anticipate the relationship and our understanding changing overnight. This approach acknowledges that engagement with Roma communities requires long-term trust-building, and depends on our cultural competency, sustained commitment and ongoing investment.
3. Continue working with trusted organisations that understand Gypsy, Roma and Traveller communities	We currently lack the knowledge and expertise to enable our Gypsy, Roma and Traveller communities to thrive, so it is important that we work with those experienced organisations that can support us to deliver this Framework and Action Plan. To date, we have worked with several organisations as we progress each priority, including Three Dragons, the Traveller Movement, London Gypsies and Travellers, Roma Support Group, Romanian and Eastern European Hub. We will continue to work with these, and other partners to ensure we build sustained relationships and deliver effective support to our Gypsy, Roma and Traveller communities. This also includes local organisations that have existing relationships with these communities and other local authorities.

Delivering accessible services

Gypsy, Roma and Traveller communities are marginalised and underserved communities; they are also culturally unique with their own traditions and ways of living. Within this context, traditional methods of public service provision are inaccessible and we must tailor service delivery to align with these communities' uniqueness and needs. Culturally competent and tailored service provision is nothing new to Brent – given our diversity, we have already established and embedded adaptive delivery approaches, however we haven't yet established this for Gypsy, Roma and Traveller communities. That is why our final priority is to deliver culturally competent, accessible services for Gypsy, Roma and Traveller communities. By delivering more accessible services that are used and trusted by these communities, we will help to improve outcomes. This includes equipping children and young people with the foundation to thrive; greater household financial resilience and better health and wellbeing.

This priority includes two commitments:

1. Establish an accessible model of support for Gypsy and Traveller communities
2. Embed a Gypsy, Roma and Traveller cultural competency training offer that is undertaken by services that frequently engage with these communities

Commitment	Detail
1. Establish an accessible model of support for Gypsy and Traveller communities	Findings from the consultation and engagement on this Framework and Action Plan, and insights from Gypsy and Traveller outcomes suggest that these communities are not accessing support services, particularly those that can prevent challenges from escalating. There may be several reasons for this, such as the communities' distrust in public services; poor outreach from public services; lack of understanding about available support etc. We believe that we can do more to tailor our support to those communities and deliver it in places where they are comfortable. In response, we will establish an accessible model of support hub for Gypsies and Travellers – this means providing in-person support with a variety of services available to speak with, in a physical space(s) close to the community and/or on site (i.e. Lynton Close). Reflecting data around Gypsy and Traveller outcomes and the consultation and engagement feedback, this support will include, but is not limited to: • Debt advice and arrears • Mental health and wellbeing • Support to access NHS services • Employment and skills • Education support: school readiness for under 5s, after school clubs and learning support; SEND support and adult learning (e.g. around employment and digital exclusion) • Youth support This model will be developed with these communities and relevant partners.
2. Embed a Gypsy, Roma and Traveller cultural competency training offer that is undertaken by services that frequently engage with these communities	Given these communities' uniqueness we need to ensure staff and partners that deliver services to them genuinely understand their culture, history and background and how to provide appropriate support. We will work with an organisation(s) with relevant expertise to design and deliver cultural competency training, centred around Gypsy, Roma and Traveller communities, for all teams that regularly work with these communities.

Evaluation and monitoring

To make sure we are delivering on our commitments to Gypsy, Roma and Traveller communities, we will develop a detailed action plan which will be reported on to Cabinet annually. The table below provides a high-level indication of the different council services that are responsible for leading on delivering our different commitments to Gypsy, Roma and Traveller communities.

We will explore opportunities for Gypsy, Roma and Traveller residents to help oversee delivery, review progress and share their views on how the Framework and Action Plan are working in practice.

Priority	Commitment	Responsible service(s)
Providing safe and suitable sites	Providing well maintained sites	Housing Services
	A clear and fair way to allocate pitches: Brent's Pitch Allocation Policy	Housing Services
	The vision for future sites	Property and Assets
	Our unauthorised encampments policy	Public Realm – Environmental Enforcement
Building strong, sustainable relationships	Continue improving our relationship with Gypsy and Traveller communities	Housing Services
	Develop a Roma community engagement plan	Strategic Commissioning Capacity Building and Engagement
	Continue working with trusted organisations that understand Gypsy, Roma and Traveller communities	All
Delivering accessible services	Establish an accessible model of support for Gypsy and Traveller communities	Resident and Housing Equity, Diversity and Inclusion Group
	Embed a Gypsy, Roma and Traveller cultural competency training offer that is undertaken by services that frequently engage with these communities	Resident and Housing Equity, Diversity and Inclusion Group

Appendix A

Brent Gypsy, Roma and Traveller Framework and Action Plan: Engagement summary

This appendix summarises what we heard through engagement with Gypsy, Roma and Traveller communities, wider Brent residents, councillors and local partners. The purpose of the engagement was to better understand people's experiences, what is working well, what needs to improve, and what matters most when planning future support, site provision and pitch allocation.

The findings give us valuable insight, but they do not tell the whole story. We know that our relationships with Gypsy, Roma and Traveller communities are still developing, and that more work is needed to build trust, listen properly and strengthen our understanding over time. The findings should therefore be read alongside the limitations set out below.

Consultation method	Number of respondents
Brent Have Your Say online survey	28
Door knocking: Gypsy and Traveller community only	28 households
Focus group: Roma community only	10
Open engagement sessions: Private Renters Fair and Tenant and Leaseholder Fair	c.20 in-depth conversations
Briefing with Brent Councillors	c.15 attendees
Additional discussion	Local school

Consultation and engagement limitations

The consultation and engagement approach succeeded in capturing a breadth of voices and in holding quality conversations. However, there were some limitations that impacted the volume of voices we were able to engage with and are important to acknowledge for future engagement.

Central to these limitations is the council's relationship with these communities. We are at the beginning of improving our understanding of, and trust with Gypsy, Roma and Traveller communities and an implicit aim of the consultation and engagement exercise was to contribute to these efforts. However, there is still a

long way to go, and we are not yet in a position where these communities will engage within the council confidently and freely.

The key limitations were:

1. Gypsy & Traveller communities: door knocking and actively engaging in the community's space – namely Lynton Close – was the most effective method of engagement. We also attempted to hold focus groups to allow for group discussion and as an alternative engagement method for the community but we failed to secure attendance.
2. Roma communities: the council currently has little to no relationship with Brent's Roma communities. With the support of RO-EE Hub, we were able to conduct a focus group, however this only comprised of the Romanian Roma community which represent one sub-section of the wider Roma community. Anecdotally, we believe Brent's Roma community also includes those from Polish, Bulgarian and Slovakian backgrounds. More information (both quantitative and qualitative) is required before we can confidently say we understand the unique needs of Brent's Roma communities.
3. Non-Gypsy, Roma or Traveller community voices: there were limited responses from Brent's non-Gypsy, Roma or Traveller communities and most of the consultation's responses came from Gypsy and Traveller communities. During the open engagement sessions, non GRT voices expressed a limited understanding of these communities which may explain the low response rate.

Key findings

The following key consultation and engagement findings are categorised within the three consultation themes. As referenced in the limitations section, most responses were from Gypsies and Travellers and therefore overwhelmingly reflect their perspectives and experiences:

1. General issues related Gypsy, Roma and Traveller communities and improving access to support services.

- Access to housing and lack of pitches: an overwhelming number of comments focused on the lack of available accommodation. Lynton Close is currently experiencing overcrowding, resulting in large multi-generational households across the site. The community want suitable accommodation, particularly for young adults so they can start families of their own.
- Site conditions: repairs and maintenance. Respondents shared their frustration around the pace of and communication around site repairs and maintenance.
- The relationship with the council: Gypsy and Traveller communities feel they have been treated unfairly and neglected by the council.
- Mental health: Gypsy and Traveller communities are acutely aware of their own and the wider community's mental health challenges, characterised by high levels of anxiety, depression and suicide. While some have accessed mental health support, they shared that the available services can be difficult to navigate and lack cultural sensitivity.
- Perspective of non-Gypsy, Roma or Traveller respondents: this group raised concerns and experiences of anti-social and violent behaviour from Gypsy, Roma and Traveller communities. However, they also recognise that the community are marginalised and that their way of living should be respected.
- Perspective of Roma respondents: while our engagement and relationship with the Roma community is in its infancy, the challenges we heard were wide ranging including: generally poor literacy and English proficiency; low immunisation rates; poor housing conditions and fear of eviction; confusion around the EU Settlement Scheme; challenges around school registration and exclusion.

2. A new Pitch Allocation Policy: how permanent and temporary pitches are allocated.

As part of the consultation, we shared a draft Pitch Allocation Policy with respondents and invited their feedback. We heard the following key points:

- The proposed bidding system is culturally inappropriate and divisive and should be scrapped in favour of a council-led direct award system.
- Priority bands should include larger families and a more specific definition around how overcrowding will be prioritised should be established.
- The 48-hour window to respond to a pitch offer is too short and requires a clearer explanation.
- Eligibility criteria: uncertainty around why immigration rules are applied and how to provide proof of Gypsy, Roma and Traveller identity. Concerns around the Roma community being eligible for pitches as, given Brent's current site is predominantly Gypsy and Irish Traveller, this may cause community tensions.
- Concerns around rent arrears impacting people's eligibility – some view this as unfair due to how some rent arrears have been inherited and accumulated.

3. Designs and features of Gypsy, Roma and Traveller sites

Gypsy, Roma and Traveller communities were asked to share desired features for sites, particularly for potential new sites. The feedback included:

- On-site community facilities that include activities around education (e.g. schooling; digital exclusion), youth support, mental health and wellbeing.
- Larger accommodation and facilities, including more space for trailers.
- A play area in the middle of the site.
- Having a site(s) that is away from industrial areas with poor air quality.
- The preference for a site size of 15-20 pitches but, ultimately, communities want everyone to have a home.

Appendix B

Responding to unauthorised encampments

The following sections detail how the council and police can respond to unauthorised encampments, using Section 66 and Section 77 notices.

Section 61

The Criminal Justice and Public Order Act 1994 allows the Police to serve a Section 61 Notice requiring persons to evacuate the land. A Section 61 Notice can only be served by the Police if certain criteria is met;

- two or more persons are trespassing on land with a common purpose to reside there

And

- reasonable steps have been taken by the landowner to ask the persons to leave. The landowner must ask them to leave.

In addition, that it is further believed

- that one or more persons have caused damage to the land or property on the land

or

- one or more persons has used threatening, abusive or insulting words or behaviour towards the occupier, a member of his/her family or an employee or agent of his/hers

or

- There have been between them six or more vehicles (including caravans) on the land

Before the Section 61 Notice can be served, Brent Council has an obligation to carry out a welfare assessment on the persons in the incursion. The assessment should identify any welfare issues that need to be addressed before any enforcement action.

A Section 61 Notice can be served within a couple of hours of attending the site provided the criteria has been met and it is the Police who lead and enforce the Section 61 Notice with Brent Council supporting. If there is a return of unauthorised campers within 3 months, the Police can impose criminal sanctions.

Section 77

The Criminal Justice and Public Order Act 1994 allows local authorities to serve a Section 77 Notice, this Notice:

- Can be used on any land within the local authority's area, regardless of ownership.
- Requires the persons to leave the specified land and remove all their property including vehicles. Vehicles and property details must be specified in the Notice.

Where persons fail to comply with a Section 77 Notice, a case file must be sent to Brent Council's Legal Team, who will prepare summons and submit them to the Magistrates.

- Once the Magistrates approve the summons and a court date is set, they are then served on the unauthorised encampment.
- At court, Brent Council will seek to have granted an Order for Removal of Vehicles and Persons granted.
- This will then be issued to the traveller incursion. Bailiffs or security personnel may be required to take possession and facilitate the removals.

As with a Section 61 Notice, a welfare assessment must be completed prior to serving a Section 77 Notice.

If there is a return of unauthorised campers within 3 months, criminal sanctions can be imposed. Serving a Section 77 Notice can be a lengthy process if the traveller incursion fails to comply.

Negotiated Stopping

While we recognise the flexibility negotiated stopping provides, at this stage the council is unable to advocate for this option in the borough.

We have exercised negotiated stopping in the past, but we do not consider this a possible option throughout the duration of this strategy due to the lack of available space and sites to accommodate an incursion. As outlined in this strategy, we have established a plan to address accommodation challenges and once this plan is realised we hope to reach a position where we can adopt greater flexibility around unauthorised encampments.

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EQUALITY IMPACT ASSESSMENT (EIA)

POLICY/PROPOSAL:	Brent Gypsy, Roma and Traveller Framework and Action Plan 2026-2030
DEPARTMENT:	Housing Services
TEAM:	Housing Services
LEAD OFFICER:	Grace Hall, Policy & Performance Manager
DATE:	19.01.26

EIA Guidance is available online, please reach out to equality@brent.gov.uk for any further support.

SECTION A – SCREENING

1. Briefly and clearly describe the policy, proposal, change, or initiative, and what it is trying to achieve.

The council is developing a new Gypsy, Roma and Traveller Framework and Action Plan which will outline the organisation's approach and commitments to support and work with the borough's Gypsy, Roma and Traveller communities.

2. Are there any groups who may be impacted by your proposal? For reference, Q4 lists all protected groups.

Gypsy, Roma and Traveller communities.

3. If no groups are affected, explain why.

4. Mark with an "X" the potential impact of the policy or proposal on different groups. You can mark more than one box for each group.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age - People of different age groups.		X	
Care Experience - People who have been in care for any period of their childhood.		X	
Disability - People with physical, sensory, learning, and mental health disabilities, long-term conditions, and non-visible disabilities.		X	
Gender reassignment - Transgender and non-binary people, including anyone who is proposing to, started, or who has completed a process to change their gender.		X	
Marriage and Civil Partnership - Applies mainly in the workplace, people who are married or in a civil partnership.		X	
Pregnancy and Maternity - People who are pregnant, on maternity leave, or new parents.		X	
Race and Ethnicity - People of different ethnicity, nationality, and skin colour.	X		
Religion or belief - People of all faiths, and those with no religious belief.		X	
Sex - Differences between men and women, including disparities in pay, career progression, and health outcomes.		X	
Sexual Orientation - People who identify as lesbian, gay, bisexual, queer, asexual, or any other non-heterosexual identity.		X	
Socio-Economic Status – People who are experiencing poverty or socio-economic disadvantage.	X		

Other relevant groups* <i>[replace this text and specify where appropriate]</i>			
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* Other relevant groups could include Carers, Refugees or Asylum Seekers, Veterans, among others. Review the EIA Guidance for more information.

5. Complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Does the policy or proposal have implications for eliminating discrimination, advancing equality of opportunity, or fostering good relations among different groups?	X	
Does it relate to an area with known inequalities?	X	
Would it add, change, or remove services used by any groups listed in Q4?	X	
Does it have negative or positive equality impacts on any groups listed in Q4?	X	
If you have answered YES to ANY of the above, proceed to section B. If you have answered NO to ALL the above, proceed straight to section C.		

SECTION B – IMPACTS ANALYSIS

6. What data and evidence have you used to understand potential impacts? This could include service user data where relevant. If there is little or no evidence, explain why, and note any plans to improve data collection in future, adding this to the Action Plan in Section E.

We have collated quantitative and qualitative insights around the outcomes, experiences and perspectives of Gypsy, Roma and Traveller communities in Brent.

The quantitative compiles existing public and Brent data from several sources; the qualitative consists of findings from the 10-week consultation dedicated to capturing insights that can inform the strategy. The consultation was delivered with the Traveller Movement, an expert Gypsy & Traveller advocacy organisation. The response rate to the latter consists of the following:

Consultation method	Number of respondents
Brent Have Your Say online survey	28
Door knocking: Gypsy and Traveller community only	28 households
Focus group: Roma community only	10
Open engagement sessions: Private Renters Fair and Tenant and Leaseholder Fair	c.20 in-depth conversations
Members briefing	c.15 attendees
Additional discussion	Mitchell Brook Primary School

7. For each characteristic:
- Provide detail for the impact listed in the response to Q4 in the left-hand box.
 - Provide data and evidence to explain how you reached your conclusion in the right-hand box.
- Relevant data sources for Brent and its residents can be found in the EIA Guidance document.

Age	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
N/A	N/A

Care Experience

Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
N/A	N/A

Disability	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
N/A	N/A

Gender Reassignment	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
N/A	N/A

Marriage and Civil Partnership	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
N/A	N/A

Pregnancy and Maternity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.

N/A	N/A
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Race and Ethnicity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The Strategy will have positive impacts on Gypsy, Roma and Traveller communities. Brent currently has no strategy and/or strategic approach to helping these communities to thrive. Through data, insight, consultation and engagement we have built a better understanding of these communities' uniqueness and needs and have establish a series of priorities and commitments that seek to deliver culturally appropriate support. Our commitments will be monitored through a dedicated action plan and will be refined and improved by working with these communities and relevant partners. We do have limitations around our understanding and connection with the Roma community therefore our commitments are limited. But we will develop a plan to build a relationship and understanding of their needs with the aim of then designing and improving services accordingly.	The following data and insight sets the evidence base for our commitments within the strategy. <u>Quantitative evidence</u> <u>Age (Census 2021)</u> Brent has a young Gypsy, Roma and Traveller population, with average ages lower than the Brent average: • Brent population, median age: 35 • Brent White Gypsy and Irish Traveller population, median age: 27 • Brent White Roma population, median age: 32 <u>School outcomes (Brent Council data)</u> Education, Health and Care Plan (EHCP) • Twice as likely to have an EHCP compared to the Gypsy, Roma and Traveller national average • Three times as likely to have an EHCP compared to the Brent pupil average <u>Special Educational Needs (SEN) support (Brent Council data)</u> • More likely to have SEN support when compared with the Gypsy, Roma and Traveller national average • Twice as likely to have SEN support when compared with Brent pupil average <u>Grade attainment (Brent Council data)</u> • Poorer outcomes compared to the Gypsy, Roma and Traveller national average across Early Years, Phonics Trend and Key Stage 2 • Better outcomes compared to the Gypsy, Roma and Traveller national average for Key Stage 4 <u>Health (NHS NWL Whole Systems Integrated Care data, 2024/25):</u>

	- Compared to the Brent average, residents at Lynton Close (Brent's permanent traveller site) have higher rates of multiple long-term conditions, anxiety, depression and learning disability. - Brent's wider Gypsy, Roma and Traveller communities have had fewer GP visits, but higher hospital admissions compared with the rest of Brent. <u>Economic activity (Census 2021)</u> - Brent's White Roma population has one of highest employment rates across all ethnic groups in the borough, ranking 2nd at 77%. - The Roma population is twice as likely to be self-employed compared to the Brent average. - Brent's Gypsy and Irish Traveller population has the lowest employment rate at 40%. <u>Qualifications (Census 2021)</u> Brent's Gypsy, Roma and Traveller communities are among the least qualified ethnic groups in the borough: - Brent White Gypsy and Irish Traveller population: 61% have no qualifications, ranking the lowest. - Brent White Roma population: 27% have no qualifications, ranking 3rd lowest.
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Religion or Belief	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
N/A	N/A

Sex	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.

N/A	N/A
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Sexual Orientation	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
N/A	N/A

Socio-Economic Status	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The data and insight we have compiled around Gypsy, Roma and Traveller communities suggest that they experience poorer socio-economic outcomes. This is characterized by outcomes around economic activity, qualifications, school outcomes and debt and arrears. Using these insights we have established several commitments within the Strategy that aim to improve outcomes in this area, thus having a positive impact.	<u>Quantitative evidence</u> <u>School outcomes (Brent Council data)</u> Education, Health and Care Plan (EHCP) • Twice as likely to have an EHCP compared to the Gypsy, Roma and Traveller national average • Three times as likely to have an EHCP compared to the Brent pupil average <u>Grade attainment (Brent Council data)</u> • Poorer outcomes compared to the Gypsy, Roma and Traveller national average across Early Years, Phonics Trend and Key Stage 2 • Better outcomes compared to the Gypsy, Roma and Traveller national average for Key Stage 4 <u>Economic activity (Census 2021)</u> • Brent's White Roma population has one of highest employment rates across all ethnic groups in the borough, ranking 2nd at 77%. • The Roma population is twice as likely to be self-employed compared to the Brent average. • Brent's Gypsy and Irish Traveller population has the lowest employment rate at 40%. <u>Qualifications (Census 2021)</u>

	Brent's Gypsy, Roma and Traveller communities are among the least qualified ethnic groups in the borough: • Brent White Gypsy and Irish Traveller population: 61% have no qualifications, ranking the lowest. • Brent White Roma population: 27% have no qualifications, ranking 3rd lowest. <u>Qualitative evidence</u> General issues related Gypsy, Roma and Traveller communities and improving access to support services. • Perspective of Roma respondents – while our engagement and relationship with the Roma community is in its infancy, the challenges we heard were wide ranging including: generally poor literacy and English proficiency; low immunisation rates; poor housing conditions and fear of eviction; confusion around the EU Settlement Scheme; challenges around school registration and exclusion. New sites: designs and features of new Gypsy, Roma and Traveller sites • On-site community facilities that include activities around: education (e.g. schooling; digital exclusion), youth support, mental health and wellbeing.
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Other Relevant Groups	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
N/A	N/A

8. Summarise any engagement activities with relevant groups (this may replicate some of the information listed in Q7). State whether those involved represent the people affected by your proposal, or whether more engagement is needed, which should be added to the Action Plan in Section E.

Dedicated consultation and engagement around the strategy was delivered which included targeted sessions with Gypsy, Roma and Traveller communities.

The response rate to the latter consists of the following:

Consultation method	Number of respondents
Brent Have Your Say online survey	28
Door knocking: Gypsy and Traveller community only	28 households
Focus group: Roma community only	10
Open engagement sessions: Private Renters Fair and Tenant and Leaseholder Fair	c.20 in-depth conversations
Members briefing	c.15 attendees
Additional discussion	Mitchell Brook Primary School

We are still building a relationship with our Gypsy, Roma and Traveller communities therefore more engagement is needed and planned as captured within commitments around:

- Maintaining a Lynton Close Engagement Plan
- Developing a Roma community engagement plan

9. Provide more detail on any areas identified as requiring further data or detailed analysis.

As captured above, further data, specifically qualitative, is required around:

- Understanding and building a relationship with our Roma communities
- Designing and delivering new Gypsy, Roma and Traveller sites

We are developing plans to deliver both.

SECTION C – CONCLUSIONS

10. Summarise your overall conclusions based on the analysis:

- If there are no impacts, state that here, and **do not complete sections E or G.**
- If you decide not to move forward, explain why, and **do not complete sections E or G.**
- If there are negative impacts, explain what you'll do to reduce them. If you choose to continue despite negative impacts, or if negative impacts remain following your action plan, provide a justification for your decision.
- If there are positive impacts, explain how these could be strengthened, where possible.

The strategy will be adopted and implemented. The core aim is to improve outcomes for our Gypsy, Roma and Traveller communities – resulting in positive impacts – as reflected in our commitments. As we deliver the strategy we will continue to work with these communities and relevant partners to continue building relationships and improving the way we deliver services, ensuring they are culturally appropriate.

SECTION D - RESULT

Select one of the following options with an "X".		
A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE/ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN AND MONITORING

Unless your proposal has no equality impacts or you are not moving forward, complete the table below to track specific actions to:

- Reduce negative impacts and increase positive outcomes.
- Monitor actual or ongoing impacts.
- Record plans to improve data collection.
- Plan any further engagement or analysis that may be required.

Use the 'Status' column on the right to indicate whether the action is yet to start, is in progress, or has been completed.

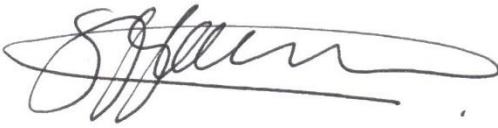
Issue Identified	Action	Lead Officer	Completion Date	Status
Poor understanding and relationship with Brent's Roma community	Develop a Roma community engagement plan, with ongoing work to implement the plan – recognising that we are starting from a low base of limited understanding of the Roma community	Charlene Santos, Community Engagement Lead	June 2026	
Poor outcomes (including health, education and socio-economic) for Gypsy and Traveller communities	Establish an accessible model of support for Gypsy and Traveller communities	Sonya Kalyniak, Head of Safeguarding and Quality Assurance	December 2026	

		Collette Hamilton, Head of Resident Experience Once appointed the Head of Housing (Building Management) In the interim – Spencer Randolph, Director – Housing Services		
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11. Describe how you will monitor the actual, ongoing impact of the policy or proposal?

The strategy will be monitored through a dedicated action plan which will be reviewed annually.

SECTION F – SIGN OFF

	Signature	Date
Officer:	 Grace Hall Policy and Performance Manager	7 July 2026
Reviewing Officer or Head of Service	 Spencer Randolph Director Housing Services	7 th July 2026

SECTION G – REVIEW

EIAs are live documents and should be reviewed regularly, especially if there are actions still to be completed or if the proposal has significant equality impacts.

When to review

- Review every 6 months until all actions in the Action Plan above are complete.
- If new data, feedback, or changes to the service arise, revisit the EIA to make sure it's still accurate.

Who should review

- The same officer who completed the EIA should carry out the review. If there's been a staffing change, the new lead officer should take over.

What to update

- Use the Status column in the Action Plan above to show progress (e.g. Not Started, In Progress, Completed). Add comments and updates in the table below — include any new data, evidence, or feedback.

When reviews can stop

- Once all actions are complete and no further equality impacts are expected, you can stop reviewing the EIA.
- Add rows to the table below as necessary until all actions are completed.

<u>Date of 1st Review:</u>	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	
<u>Date of 2nd Review:</u>	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	
<u>Date of 3rd Review:</u>	
Officer:	

Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	

	Cabinet 7 September 2026
	Report from the Corporate Director of Children, Young People and Community Development
	Lead Member - Cabinet Member for Children Services, Employment & Climate Action (Councillor Jake Rubin)
Future Commissioning and Delivery Options for Best Start Family Hubs Support Services	
Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
List of Appendices:	Two Appendix 1: Financial cost analysis Appendix 2: Equality Impact Assessment
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Palvinder Kudhail, Director of Early Help and Social Care 020 8937 Palvinder.kudhail@brent.gov.uk Serita Kwofie, Head of Early Help 020 8937 1747 serita.kwofie@brent.gov.uk

1.0 Executive Summary

- 1.1 This report seeks Cabinet approval to insource Best Start Family Hubs (BSFHs) support services, currently delivered by Barnardo's Services Limited, when the existing contractual arrangements come to an end in March 2027. The recommendation supports a more integrated, Council-led Family Hub and Early Help model from April 2027.
- 1.2 National policy continues to position Family Hubs as a central mechanism for improving outcomes for children and families through integrated early intervention and prevention. Locally, BSFH support services directly support

Brent's priorities to improve outcomes for children, reduce inequalities, strengthen school readiness and parenting capacity and ensure families can access help at the earliest opportunity.

- 1.3 A review of future delivery options, including benchmarking with other local authorities, has concluded that an in-house model offers the strongest balance of service quality, accountability, integration, ease of delivery and value for money. It would enable the Council to align the BSFH workforce within a single management structure strengthening oversight of outcomes to deliver a sustainable preventative offer for children, young people and families.

2.0 Recommendations

That Cabinet:

- 2.1 Approve the insourcing of the majority of Best Start Family Hubs Support Services from 1 April 2027, creating a fully integrated Council-led Family Hub and Early Help model that strengthens accountability, consistency of practice, quality assurance, service integration and value for money.
- 2.2 Delegate authority to the Corporate Director of Children, Young People and Community Development, in consultation with the Lead Member for Children's Services, Employment and Climate Action, to take all necessary steps to implement the transition, including consultation, workforce arrangements, service mobilisation and any associated operational decisions required to ensure continuity of provision.

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 BSFHs are a central part of Brent's commitment to giving children the best start in life and supporting families earlier, closer to home and in a more joined-up way. The proposed insourcing of BSFH Support Services will strengthen the Council's ability to deliver an integrated Family Hub and Early Help offer, improve accountability for outcomes and ensure resources are aligned to local need.
- 3.1.2 This recommendation supports the Council's wider priorities to reduce inequalities, improve children's outcomes, support school readiness and strengthen preventative services. It also reflects national policy direction for Family Hubs and Best Start in Life, while providing a more sustainable and cost-effective model for Brent residents.
- 3.1.3 BSFHs are at the heart of Brent's Early Help community-based offer and are a priority in the Borough Plan (2023-27). The change in name from Family Wellbeing Centres to BSFHs is a requirement of the DfE as part of the national programme from 1 April 2026. The BSFHs provide an integrated 'whole family' (for children aged 0-18 years old, and 25 for those with SEND) service, to act as a single accessible point where families can seamlessly access integrated

health, education, parenting and welfare support. This arrangement helps the co-ordination and delivery of services for more vulnerable children using contextual safeguarding approaches.

- 3.1.4 BSFHs act as an entry point, providing guidance and evidence based accredited interventions to prevent families' issues from escalating to crises and requiring more costly support. The ethos is grounded in prevention using a 'whole family' relational approach, empowering families to achieve and sustain better long-term outcomes. Locally, the services contribute directly to the Council's priorities around improving outcomes for children, reducing inequalities, supporting school readiness, strengthening parenting capacity and enabling families to access help at the earliest opportunity. The support services also underpin delivery of the Council's Best Start in Life programme with partner agencies.
- 3.1.5 The Family Hub model enabled the successful delivery of the government's Family Hub and Start for Life Programme 2023-2026. Brent was one of the initial 75 local authorities chosen to receive funding to pilot the Family Hub model. Brent's model has been of interest to the National Family Hub Network and government departments and has received multiple visits to explore and share good practice. Building on this, the Brent BSFHs are integral to the Council's strategy to deliver the DfE's national Best Start in Life, Family Hub and Healthy Babies Programme. This requires all local authorities to provide BSFHs from April 2026 to meet the requirements of the national programme. The BSFHs are a key delivery point for integrating support services from maternity through the early years and align with the aims of the programme to ensure the best support is available to families in the first 1,001 days of a child's life.
- 3.1.6 BSFHs contribute to delivering other national programmes such as the Families First Partnership Programme and Reducing Parental Conflict Project. The BSFHs also contribute to the successful delivery of local borough strategies including for example: the Early Years Strategy 2026-2029, the Youth Strategy 2025-2028, the Inclusion Strategy 2026-2029 and the national SEND reforms, Violence Against Women and Girls Strategy 2026-2029, Health and Wellbeing Strategy and the Black Community Action Plan.
- 3.1.7 The Family Hub delivery model also aligns with the Neighbourhood Health Framework (February 2026) and Neighbourhood Local Outcomes Framework (March 2026) that define the roles of ICBs, Health and Wellbeing Boards, Local Authorities and other partners in neighbourhood health development and implementation.

3.2 Background

- 3.2.1 The Council entered into a contract for Family Hub Support Services with Barnardo's Services Limited ("Barnardo's") on 1 December 2021 (the "Contract") for a period of three years with an option to extend for two years, on a one plus one basis, at a total estimated contract value of £3,203,917.00.

- 3.2.2 The current contract was originally awarded in December 2021 for five years (3+1+1) with a total value of £3.2m and provides key support functions across Brent's Best Start Family Hubs, including Family Support Assistants, Early Years Workers, volunteering support and crèche provision. The contract is due to end on 30 November 2026. However, Barnardo's has in principle agreed to enter into a new contract for a period of four (4) months from 1 December 2026 until 31 March 2027, which will provide continuity of provision for a short-term period while a new service is established. Officers are currently progressing arrangements to enter into a new short-term four (4) month contract, including completion of the Council's governance procedures to award the contract in accordance with the Council's Contract Standing Orders.
- 3.2.3 Barnardo's is commissioned to provide support services that enhance the delivery model across 6 Family Hubs. The support services are provided across Alpertons, Church Lane, Granville, Preston Park, St Raphael's and Three Trees hubs. The BSFHs Support Services contract includes provision for Family Support Assistants, Early Years Workers, a volunteer programme and creche programme (see Table 1). The support services provided by Barnardo's are delivered within an integrated delivery model alongside Brent employed staff in each setting - the BSFH Manager, Centre Support Officer and Triage Worker.

Table 1: Contracted Barnardo's Roles and Full Time Equivalent (FTE) posts

Service	FTE
Crèche Coordinator	0.6 (0.6 in post)
Crèche programme	Bank of 13 flexible crèche workers
Volunteer Coordinator	1 (1 in post)
Volunteer programme	Volunteers to work across the BSFH
Family Support Assistants (FSA)	6 (currently 6 FTE in post)
Early Years Workers (EYW)	6 (currently 5 FTE in post)
TOTAL	13.6 (currently 12.6 in post)

- 3.2.4 The current contract brings added social value benefits to vulnerable families, including for example, access to a Crisis Fund, the donation and distribution of white goods, mobile devices and data, gifts for children, food donations and access to social trips. These equated to approximately £50k in social value benefits during the 2025-26 financial year.
- 3.2.5 The Public Health Grant contributes £500k towards the Contract and it has been agreed to maintain this level of funding to March 2029. The remainder of the Contract is funded from the General Fund.

3.3 Options Appraisal

- 3.3.1 Officers have assessed three options for the future delivery of BSFH Support Services from April 2027, when the current contract comes to an end:

- a) Re-tendering the service to commission an external provider

b) Bringing the majority of the service in- house

c) Ceasing the service

a) Option 1 – Re-tendering the Service

This option would involve commissioning an external provider through a competitive procurement process. It could provide an opportunity to test market interest and innovation and, as is the case with the current contract, an opportunity to secure voluntary and community sector social value. However, it would retain the current split delivery model with Council-employed staff and provider-employed staff working in BSFHs, which can create ongoing complexity in workforce management, accountability, quality assurance and consistency of practice across the hubs.

A full procurement exercise would be required to establish the true market cost of an external service. Based on indicative extension pricing provided by Barnardo's, and allowing for National Insurance and inflationary uplifts, the estimated annual cost of a tendered external model is approximately £882k from 2027/28. This is higher than the estimated cost of the proposed in-house model.

A full tendering exercise would take approximately 9 months to complete. This would be challenging to achieve within the available implementation timescale.

b) Option 2 – Bringing the majority of BSFH Support Services In-house

This option would transfer BSFH Support Services into a single Council-led delivery model. It would align the BSFH workforce under one management structure, which would support a strengthening of accountability and consistency of practice across BSFHs. It would enable resources to be deployed more flexibly in response to local need, neighbourhood working and wider reforms of the children's early help and social care system (the Families First Partnership Programme). The in-house model is also more cost effective, as existing Council management and support arrangements can absorb functions currently provided through the Support Services Contract, reducing duplication and overhead costs.

An option that will be considered is to commission the creche provision to a local VCS provider, rather than bringing this under Council management. This service includes a Creche Coordinator (0.6 FTE) and flexible Creche Workers (x10-15). The Creche enables families with young children to access services such as parenting programmes, domestic abuse support and adult learning, commissioning this provision would be achievable by 31 March 2027.

The proposed model for an in-house service is set out in Table 2. This integrates the Support Service function with existing BSFH posts that are Brent Council employees.

Table 2: Proposed In-house Staffing Model

Service	FTE
Brent employed staff	
Service Manager	1
Family Hub Managers	6
Centre Support Officers	6
Inclusion Practitioners	6
Triage Officer	6
Barnardo's employed staff	
Family Support Assistants (FSA)	6
Early Years Workers (EYW)	6
Creche Coordinator	0.6
Flexible Creche Workers	(12-15)
TOTAL	37.6 (excludes flexible Creche workers)

Indicative additional costs estimated at approximately £662K per annum from 2027/28 (see Appendix 1) which would deliver improved value for money.

c) Option 3 - Ceasing the support services

Ceasing BSFH Support Services when the current contract ends is not considered viable. The services form a core part of Brent's preventative Early Help and Family Hub offer, providing family support, early years interventions, volunteering and crèche provision that enable children and families to access support at an earlier stage. Ending the service would reduce the Council's ability to meet national Family Hub and Best Start in Life expectations, create a gap in key preventative provision and would likely increase pressure across the wider children and family's system.

3.4 Evaluation

- 3.4.1 The current model has a number of strengths - for example, partnership working with a national voluntary sector organisation brings additional social value benefits for vulnerable families. However, bringing the service in-house would provide greater flexibility, stronger operational control and clearer accountability as neighbourhood working across local authority services and with the health sector and integrated Early Help arrangements develop across the borough.
- 3.4.2 The key benefit of the in-house model is its ability to adapt alongside Brent's evolving Family Hub, Best Start in Life and emerging neighbourhood-based service delivery approaches. BSFH are highly visible community assets and important access points for family support. A Council-led model would support

more consistent practice, stronger outcome oversight and more agile use of resources to meet changing local needs. The financial rationale for the preferred option is set out in section 5.

- 3.4.3 The proposed in-house model will build on the strengths of the existing service, including positive performance in engaging new families, increasing family contact and supporting school readiness. It will also retain a focus on value-added support for families by fast-tracking access, through Triage Officers, to Brent's wider cost of living support initiatives such as the Crisis and Resilience Fund. Officers consider that the benefits of the current offer can be retained and strengthened through a more integrated Council-led model that provides greater flexibility, clearer oversight of outcomes and improved value for money.
- 3.4.4 A benchmarking exercise was undertaken during 2026 of six local authorities' provision, with information gathered from the published websites of a further five. The findings indicate that only a small number of local authorities continue to operate a fully commissioned support service model and that the majority of comparable local authorities operate predominantly in-house Family Hub and Early Help support models, supplemented by targeted commissioned activity from the voluntary and community sector. The extent of voluntary and community sector involvement varies across local areas, and only one authority, Essex, was identified as operating a fully commissioned delivery model. It should be noted that direct comparison is limited by the complexity of local delivery arrangements and the limited availability of detailed staffing and contract expenditure information.
- 3.4.5 Officers considered whether a short pre-market engagement exercise should be undertaken to test provider interest and indicative costs. Procurement and Legal advice confirmed that a meaningful exercise would require a full and structured market engagement process, and that to obtain costs, a tender process would need to be carried out. Given the conclusion that the in-house model is the preferred option, officers do not consider that pre-market engagement would add sufficient value at this stage.
- 3.4.6 Subject to the financial implications set out in section 5, the in-house model is recommended as the preferred option. It provides the strongest overall balance of service quality, accountability, ability to deliver, strategic alignment and value for money for Brent residents.

4.0 Stakeholder and ward member consultation and engagement

- 4.1 Engagement has taken place with the Cabinet Member for Children's Services, Employment and Climate Action and relevant senior officers to consider the strategic, operational and financial implications of the future delivery options for BSFH Support Services.
- 4.2 Engagement has also taken place with relevant senior staff from Barnardo's regarding the extension of the service, operational implications and potential future arrangements.

- 4.3 Subject to Cabinet approval, a structured consultation and communication plan will be implemented to support transition to the proposed in-house model. This will include engagement with Barnardo's, affected staff, trade unions, Council staff and relevant partners. Consultation will be undertaken in accordance with TUPE and HR requirements, with a focus on ensuring service continuity, supporting affected employees and maintaining clear communication with families, partners and stakeholders throughout the transition period.

5.0 Financial Considerations

- 5.1 In December 2021, the Cabinet agreed the award of the contract to Barnardo's for 5 years (3 years with the option to extend by 2 x 12-month extensions) from 1 Dec 2021 to 30 November 2026 at a total contract value of £3.2m.
- 5.2 Barnardo's has in principle agreed to enter into a new contract for a period of four months from 1 December 2026 until 31 March 2027, therefore the estimated costs for the 2026/27 financial year will be the eight remaining months of Barnardo's existing contract (£433K) and four months under the new contract (£279K), a total of £712K. Sufficient funding exists to cover these costs but there are risks included in Table 3, paragraph 5.7.
- 5.3 Barnardo's currently holds £274K of unspent funding from previous financial years. These funds are intended to support the planned contract extension from December to March 2027. The Council is currently awaiting a formal response from Barnardo's to confirm this arrangement.
- 5.4 The expected value of the in-sourcing option is £662K per annum for financial year 2027/28 based on the proposed structure by the service. The current financial modelling is based on the current staffing costs of the Barnardo's contract linked to the salary bandings for the council GPC scales, including assumptions in relation to overhead costs and management capacity. A full financial analysis over 3-years is detailed in Appendix 1.
- 5.5 For comparison, the cost of Barnardo's delivering the service for financial year 2027/28 is estimated to be £882k per annum. This is based on Barnardo's pricing offer to extend the contract from December 2026 to March 2027 and not on a soft-market testing exercise. A full financial analysis over 3-years is detailed in Annex 1.
- 5.6 In terms of funding, the contract is funded by the General Fund budget and a contribution from the Public Health Grant. A new in-house service would also rely on this contribution. The Public Health Grant funding contribution is currently time-limited (3 years). Further engagement is required to confirm ongoing Public Health Grant funding post March 2029. If the service is to discontinue due to lack of funding from April 2029 onwards, there is a further risk of associated redundancy costs which would result in a pressure against the council's budgets.

Risks

- 5.7 Table 3 sets out the key risks related to the preferred option of bringing the service in-house and how they would be mitigated.

Table 3: Key risks and mitigations

Risk/issue description (incl. impact)	Planned mitigation or resolution	Owner
Staff do not want to TUPE to the Council	1. Ensure staff fully understand the benefits through good communication 2. Consultation on TUPE is timed early to allow time for recruitment to any vacant posts	Head of Early Help
A tendering process for creche facilities does not result in appointment of a third party to run them	1. Targeted market engagement to identify potential providers 2. Contingency plans to cover the service in-house	Head of Early Help
Families cannot access services as there is delay in the transfer that impacts on delivery	1. Close working with Barnardo's to focus delivery leading up to the transfer on services that have the highest uptake by families in the context of any delays.	Head of Early Help
Public Health grant funding is not confirmed beyond 2029 causing a service redesign	1. Early engagement with Public Health to confirm funding allocation 2. Consider other funding sources for services 3. Continued review of services to ensure model meets what families need.	Director, Early Help and Social Care and Director of Public Health
Risk of delay or difficulties managing the transfer results in additional unfunded costs	1. Ensure full understanding of financial position. 2. Generate contingency arrangements to avoid duplicate costs as part of risk management	Head of Early Help

6.0 Legal Considerations

- 6.1 The statutory obligations in the Childcare Act 2006 ('the 2006 Act') concern 'young children', which essentially are those aged between 0-5yrs. Section 1 of the 2006 Act imposes on local authorities a general duty in relation to the well-being of young children to:

- (a) improve the well-being of young children in their area proactively and preventatively,
- (b) reduce inequalities between young children in their area in relation to:
 - Physical and mental health and emotional well-being
 - Protection from harm and neglect;
 - Education, training and recreations;
 - The contribution made by them to society; and
 - Their social and economic well-being.

- (c) secure integrated early childhood services by working with health, education, employment services, voluntary and community partners (sections 2-4).
- 6.2 S.3 of the 2006 Act sets out specific duties the council has in relation to early childhood services which includes early years provision and provides that the council must make arrangements to ensure that early childhood services in their area are provided in an integrated manner which is calculated to facilitate access to those services, and maximise the benefit of those services to parents, prospective parents and young children. In discharging its duties, the council must have regard to any guidance given from time to time by the Secretary of State.
- 6.3 Section 5A of the 2006 Act provides that:
 - (1) Arrangements made by an English Local Authority under section 3(2) must, so far as is reasonably practicable, include arrangements for sufficient provision of children's centres to meet local need.
 - (2) 'Local need' is the need of parents, prospective parents and young children in the authority's area.'
- 6.4 The Council has a wide general power of competence under Section 1 of the Localism Act 2011 to do anything that individuals generally may do. The existence of the general power is not limited by the existence of any other power of the Council which (to any extent) overlaps the general power. The Council can therefore rely on this power to provide the services as set out in the options in this report.
- 6.5 In considering any recommendations, the Council should have regard to the Council's obligations to carry out its duties in accordance with the principles of best value - to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.
- 6.6 The Council is also required to undertake appropriate consultation with stakeholders when seeking to change the mode of delivery of a legal function.
- 6.7 The proposed decision on the options for the future of the Best Start Family Hub contract is a matter reserved to Cabinet, as per Paragraph 10.1 (a) of Part 3 of the Constitution states "where the exercise of that function or the making of that decision would or would be likely to conflict with or result in a change or departure from any decision or policy agreed by the Council or the Cabinet, other than the determination of planning applications where the departure from the development plan is determined in accordance with section 54A of the Town and Country Planning Act 1990". Additionally, Paragraph 10.1(k) provides that a matter is reserved where the exercise of that function or the making of that decision would or would be likely in the opinion of the relevant Corporate Director or the Chief Executive to result in a very significant change in the model of service delivery. Given that the proposed decision would be a departure from

a decision previously approved by Cabinet and given that this would be a significant change in the model of service delivery, it is considered that proposed decision to approve the insourcing of the BSFH Support Services is made by Cabinet.

- 6.8 As set out at paragraph 6.6, the Council is required to undertake appropriate consultation with stakeholders as the proposed decision pertains to changing the mode of delivery in relation to a legal function.
- 6.9 Any option to conduct a re-procurement exercise must comply with the Procurement Act 2023 (PA 23) and the Council's Contract Standing Orders within Part 2 of the Constitution. The services for Best Start Family Hub Support Services will be classified as "Light Touch Services" under Schedule 1 of the Procurement Regulations 2024 (the "PR 2024"), which means the procurement would be subject to the special regime for Light Touch Contracts as defined in section 9 of the PA 23. The threshold for Light Touch Services is currently set at £663,540 (including VAT).
- 6.10 The proposed decision to insource the BSFH Support Services will be a Key Decision, in which case the decision may not be taken unless this matter has been published on the Forward Plan. A Key Decision must be published on the Forward Plan (Paragraph 30 of the Access to Information Rules) and must be included on the Forward Plan not less than 28 days before the decision is to be made. (Paragraph 34 of the Access to Information Rules).
- 6.11 The Transfer of Undertakings Protection of Employment Regulations 2006 (TUPE) is likely to apply as there will be a continuation of the service when it is brought in-house. All affected staff who are part of an organised grouping of employees will automatically transfer to the Council on their existing terms and conditions. The Council must ensure that appropriate information and consultation obligations are complied with in relation to affected employees, and TUPE consultation should commence as soon as possible. Where employees are not dedicated to, or principally assigned to, the relevant contract, they are unlikely to fall within the scope of TUPE.

7.0 Equity, Diversity and Inclusion (EDI) Considerations

- 7.1 The Public Sector Equality Duty under section 149 of the Equality Act 2010 requires the Local Authority 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 covered under the Act are age, disability, gender reassignment, marriage and civil partnership (only in respect of eliminating unlawful discrimination) pregnancy and maternity, race (this includes ethnic or national origins, colour or nationality) religion or belief (this includes lack of belief) sex and sexual orientation. Due regard means giving relevant and proportionate consideration to the duty, in that whenever significant decisions are being made consideration must be given to the impact/affect that implementing a particular decision will

have in relation to equality before making that decision. Brent Council also has a policy of considering Human Rights and socio-economic impact.

- 7.2 An Equality Analysis has been carried out on the proposals set out in this report and is provided as Appendix 2 to this report. It is not anticipated there will be any negative impact from these proposals on the basis of age, disability, gender reassignment, marriage and civil partnership (only in respect of eliminating unlawful discrimination) pregnancy and maternity, race (this includes ethnic or national origins, colour or nationality) religion or belief (this includes lack of belief) sex and sexual orientation.

8.0 Climate Change and Environmental Considerations

- 8.1 BSFHs provide services in the community for local families, aimed at reducing the need for unnecessary travel to access support.

9.0 Human Resources/Property Considerations

- 9.1 The service is currently provided by an external contractor. There is TUPE liabilities for all options considered, whether in-sourcing or undertaking a competitive tender. As the proposed decision is for in-sourcing the service, Barnardo's staff would be eligible to TUPE to the Council.
- 9.2 There are up to 13.6 FTE roles, plus 13 flexible creche workers (on zero contract hours), who could be subject to TUPE implications. However, the exact number will depend on current staff numbers at the time of transfer.
- 9.3 There could be significant additional costs, such as pensions considerations, that delay the transfer to an in-house service or onboarding a new supplier. This would involve consultation with staff.
- 9.4 There are no separate property implications as BSFH Support staff are based at the BSFH as part of the integrated delivery model.
- 9.5 There are licences to occupy for all the BSFH premises which are mandatory part of the BSFH Support Services contract with an external supplier. There are no such implications for an in-house model.

10.0 Communication Considerations

- 10.1 Subject to Cabinet approval, a clear communication strategy will be developed to support transition to the proposed in-house model and maintain confidence in the continuity of BSFH Support Services. Communications will provide timely and consistent messages to affected staff, Barnardo's, trade unions, Council teams, Family Hub managers, partners, local ward members and families using the hubs as relevant. The rationale for the change will be explained, and stakeholders will be reassured that services will continue during the transition period.

10.2 Staff will be kept fully informed of the programme of change, including consultation on TUPE arrangements and key implementation milestones.

Related document(s) for reference

[Cabinet Paper – Development of Family Hubs, 14 October 2019](#)

Report sign off:

Nigel Chapman

Corporate Director, Children, Young People and
Community Development

Legal considerations provided by:
Elizabeth Benjamin

Finance considerations provided by:
Folake Olufeko

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Appendix 1 Financial analysis

	25/26 costs				26/27 costs (assuming 3.2% pay award)	27/28 costs (assuming 3% pay award)	2028/29 (assuming 3% pay award)	
Option 1: In-house								
Post	No.	Grade	Annual (£)	Total (£)		Total (£)		Notes/ Comments
Early Years Practitioners	6	Scale 4	44,914	269,484	278,107	286,451	295,044	Grade based on current Barnardo's salary, including oncosts, approximated to GLPC scale
Family Support Assistants	6	Scale 5	47,985	287,910	297,123	306,037	315,218	Grade based on current Barnardo's salary, including oncosts, approximated to GLPC scale
Creche Coordinator	0.6	Scale 6	51,700	31,020	32,013	32,973	33,962	Grade based on current Barnardo's salary, including oncosts, approximated to GLPC scale
Creche workers	0	Scale 3		30,000	30,960	31,889	32,845	Creche workers are paid an hourly rate as and when required
Management, inc HR support				3,000	3,000	3,000	3,000	Management will be provided using current establishment within Early Help. FWC managers have capacity to manage additional staff given changes to the FWC core teams in June 2025. HR costs are estimated.
Administration								Administration will be provided using current establishment within Early Help.
Other costs (laptops, travel expenses)				2,000	2,000	2,000	2,000	Barnardo's staff currently have Brent issued laptops and these will be re-purposed. Travel costs are estimated.
				623,414	643,203	662,349	682,070	

Cost of Barnardo's contract based on latest pricing offer

	Scale	FTE	Salary Costs (
Staffing:			
Early Years Practitioners	37,872	6	227,229
Family Support Assistants	41,511	6	249,064
Volunteer Coordinator	48,422	1	48,422
Creche Co-Ordinator	36,993	0.6	22,196
Creche	36,112	1.84	66,446
Admin	36,617	0.60	21,970
Management	63,186	1	63,186
Staffing Costs			698,513

Other:			
Training			10,893
Supplies			1,100
ICT			6,198
Premises			4,885
Expenses / Other staff			13,131
Overheads (Please provide details)			103,159
Other costs			139,366
TOTAL COSTS			837,879

Assumes 2.6% inflation rate

26/27	27/28	28/29
859,664	882,015	904,947

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EQUALITY IMPACT ASSESSMENT (EIA)

POLICY/PROPOSAL:	Future of Best Start Family Hubs Support Services
DEPARTMENT:	CYPCD
TEAM:	Early Help
LEAD OFFICER:	Simon Topping, Family Hub Service Manager
DATE:	17 August 2026

EIA Guidance is available online, please reach out to equality@brent.gov.uk for any further support.

SECTION A – SCREENING

1. Briefly and clearly describe the policy, proposal, change, or initiative, and what it is trying to achieve.

The proposal seeks Cabinet approval to insource Best Start Family Hubs (BSFHs) support services, currently delivered by Barnardo's Services Limited, when the existing contractual arrangements come to an end on 31 March 2027. The recommendation supports a more integrated, Council-led Family Hub and Early Help model from 1 April 2027.

National policy continues to position Family Hubs as a central mechanism for improving outcomes for children and families through integrated early intervention and prevention. Locally, BSFH support services directly support Brent's priorities to improve outcomes for children, reduce inequalities, strengthen school readiness and parenting capacity and ensure families can access help at the earliest opportunity.

2. Are there any groups who may be impacted by your proposal? For reference, Q4 lists all protected groups.

Yes, see Q4

3. If no groups are affected, explain why.

N/A

4. Mark with an “X” the potential impact of the policy or proposal on different groups. You can mark more than one box for each group.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age - People of different age groups.	X		
Care Experience - People who have been in care for any period of their childhood.		X	
Disability - People with physical, sensory, learning, and mental health disabilities, long-term conditions, and non-visible disabilities.	X		
Gender reassignment - Transgender and non-binary people, including anyone who is proposing to, started, or who has completed a process to change their gender.		X	
Marriage and Civil Partnership - Applies mainly in the workplace, people who are married or in a civil partnership.		X	
Pregnancy and Maternity - People who are pregnant, on maternity leave, or new parents.	X		
Race and Ethnicity - People of different ethnicity, nationality, and skin colour.	X		
Religion or belief - People of all faiths, and those with no religious belief.		X	
Sex - Differences between men and women, including disparities in pay, career progression, and health outcomes.	X		
Sexual Orientation - People who identify as lesbian, gay, bisexual, queer, asexual, or any other non-heterosexual identity.		X	

Socio-Economic Status – People who are experiencing poverty or socio-economic disadvantage.		X	
Other relevant groups* <i>[replace this text and specify where appropriate]</i>		N/A	

* Other relevant groups could include Carers, Refugees or Asylum Seekers, Veterans, among others. Review the EIA Guidance for more information.

5. Complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Does the policy or proposal have implications for eliminating discrimination, advancing equality of opportunity, or fostering good relations among different groups?	X	
Does it relate to an area with known inequalities?		X
Would it add, change, or remove services used by any groups listed in Q4?	X	
Does it have negative or positive equality impacts on any groups listed in Q4?	X	
If you have answered YES to ANY of the above, proceed to section B. If you have answered NO to ALL the above, proceed straight to section C.		

SECTION B – IMPACTS ANALYSIS

6. What data and evidence have you used to understand potential impacts? This could include service user data where relevant. If there is little or no evidence, explain why, and note any plans to improve data collection in future, adding this to the Action Plan in Section E.

BSFH collect data on services users accessing activities across the Hub network. This includes demographic data where this has been provided at the point of registration.

There is a bi-annual satisfaction survey completed with families which is a qualitative analysis regarding families views of quality of provision, outcomes and impact and ideas for service improvement.

7. For each characteristic:
- Provide detail for the impact listed in the response to Q4 in the left-hand box.
 - Provide data and evidence to explain how you reached your conclusion in the right-hand box.
- Relevant data sources for Brent and its residents can be found in the EIA Guidance document.

Age	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The insourcing of the majority of BSFH Support Services from 1 April 2027 will create a fully integrated Council-led Family Hub and Early Help model that strengthens accountability, consistency of practice, quality assurance, service integration and value for money. Bringing the service in-house will provide greater flexibility, stronger operational control and clearer accountability as neighborhood working across local authority services and with the health sector and integrated Early Help arrangements develop across the borough. It is anticipated service improvements made through the in-house model will improve: - engagement from families with young children - access and attendance for some BSFH activities - more families achieving positive outcomes and impact.	A review of the current commissioned delivery model has identified persistent operational, management and quality assurance challenges within the current commissioned model. These relate particularly to service integration, accountability, workforce stability and alignment with Brent's Family Hub operating model. Although these issues have been addressed through contract management and operational discussions, they have persisted over time and continue to limit the Council's ability to deliver a fully integrated Early Help and Family Hub offer. This has also impacted on service delivery and family engagement such as: - Some activities being cancelled at short notice due to sickness - Feedback from families regarding the quality of delivery of some activities - The ability to deliver reliable early years offer, impacting family engagement.

To note the eligibility criteria for accessing BSFH services will remain unchanged following transfer to the in-house model. Existing accessibility arrangements, translation/ creche support, communication channels and service standards will be maintained during the transition.	
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Care Experience	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
N/A	

Disability	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
It is anticipated service improvements made through the in-house model in partnership with the new Best Start Inclusion Practitioners will improve: - Engagement and attendance from families with SEND children - Identification of children with SEND - Connecting families into the SEND Local Offer and Experts At Hand offer - more families with SEND children achieving positive outcomes and impact. To note the eligibility criteria for accessing BSFH services will remain unchanged following transfer to the in-house model. Existing accessibility arrangements, translation/ creche support, communication channels and service standards will be maintained during the transition.	Supporting data and evidence will include: - Numbers of families with SEND children registering for Family Hubs - Attendance of families with SEND children accessing activities - The number of SEND children identified, supported and connected into specialist provision where appropriate - Monitoring outcomes and impact of families with SEND children i.e. WellComm assessment data for children with Speech Language Communication Needs.

Gender Reassignment	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
N/A	

Marriage and Civil Partnership	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
N/A	

Pregnancy and Maternity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
It is anticipated service improvements made through the in-house model in partnership with Midwifery and Health Visiting services will improve: - Engagement and attendance from families with new birth children - The numbers of children receiving 6-8 week physical checks - The numbers of families choosing to breastfeed and accessing specialist support where necessary - More families with new birth children achieving positive outcomes and impact. To note the eligibility criteria for accessing BSFH services will remain unchanged following transfer to the in-house model. Existing accessibility arrangements, translation/ creche support, communication channels and service standards will be maintained during the transition.	Supporting data and evidence will include: - Numbers of families with new birth children registering for Family Hubs - Attendance of families with new birth children accessing activities - The number of new birth children identified, supported and connected into specialist provision where appropriate - Monitoring outcomes and impact of families with new birth children.

Race and Ethnicity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
BSFH are located in areas with high levels of deprivation supporting families from ethnic minorities, with English as an Additional Language, and disadvantaged backgrounds. It is anticipated that service improvements made through the in-house model will: Improve engagement and attendance from ethnic minority families that reflect the catchment areas of the BSFH	Supporting data and evidence will include: - Numbers of ethnic minority families registering for Family Hubs - Attendance of ethnic minority families accessing activities - The number of ethnic minority families supported and connected into specialist provision where appropriate - Monitoring outcomes and impact of ethnic minority families.

• Reduce the impact of health and socio-economic inequalities • Increase the number of ethnic minority families achieving positive outcomes and impact. To note the eligibility criteria for accessing BSFH services will remain unchanged following transfer to the in-house model. Existing accessibility arrangements, translation/creche support, communication channels and service standards will be maintained during the transition.	
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Religion or Belief	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
N/A	

Sex	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
As part of the national Best Start in Life and Family Hubs programme there is a focus on supporting Mums and Dads during the first 1,001 days of a child's life. It is anticipated that service improvements made through the in-house model will: • Improve engagement and attendance from Dads via the Dads worker/ programme of activities and support • Increase parents, with young children, to access specialist support such as accredited parenting programmes, infant feeding support, parent and infant relationship support services • Improve the co-production of BSFH services by ensuring the voices of families with young children are actively listened to • Increase the number of families with very young children achieving positive outcomes and impact.	Supporting data and evidence will include: • Numbers of families with young children registering for Family Hubs • Numbers of Dads registering for Family Hubs • Attendance of families with young children accessing activities • Numbers of Dads accessing activities • Numbers of families with young children supported and connected into specialist provision where appropriate • Monitoring outcomes and impact of families with young children.

To note the eligibility criteria for accessing BSFH services will remain unchanged following transfer to the in-house model. Existing accessibility arrangements, translation/creche support, communication channels and service standards will be maintained during the transition.	
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Sexual Orientation	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
N/A	

Socio-Economic Status	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
N/A	

Other Relevant Groups	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
N/A	

8. Summarise any engagement activities with relevant groups (this may replicate some of the information listed in Q7). State whether those involved represent the people affected by your proposal, or whether more engagement is needed, which should be added to the Action Plan in Section E.

Following Cabinet approval regarding the decision to bring the services in-house we will consult with families on the proposal. The engagement plan is detailed in section E. A separate EIA will be completed for staff transferring as a result of the proposal if agreed.
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9. Provide more detail on any areas identified as requiring further data or detailed analysis.

No further data is needed at this stage.
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SECTION C – CONCLUSIONS

10. Summarise your overall conclusions based on the analysis:

- If there are no impacts, state that here, and **do not complete sections E or G.**

- If you decide not to move forward, explain why, and **do not complete sections E or G.**
- If there are negative impacts, explain what you'll do to reduce them. If you choose to continue despite negative impacts, or if negative impacts remain following your action plan, provide a justification for your decision.
- If there are positive impacts, explain how these could be strengthened, where possible.

No negative equality impacts have been identified. The proposed transfer from a contracted service to an in-house service is expected to have either a neutral impact on most characteristics and a positive impact on some families identified with protected characteristics.

Bringing the BSFH support services in-house will provide greater flexibility, stronger operational control and clearer accountability as neighborhood working across local authority services and with the health sector and integrated Early Help arrangements develop across the borough. This will help to improve:

- service integration and standards
- accountability procedures
- workforce stability, access to training and skills
- responsiveness to service users changing needs
- engagement from families with young children
- access and attendance for some BSFH activities
- alignment with Brent's BSFH operating model
- more families achieving positive outcomes and impact.

The transition of the support services from the current externally commissioned provider may initially create some instability in the delivery model. However, this will be mitigated against via robust transition planning and monitoring, effective communication and engagement with stakeholders and ensuring staff feel supported and valued throughout the process.

SECTION D - RESULT

<i>Select one of the following options with an "X".</i>		
A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE/ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN AND MONITORING

Unless your proposal has no equality impacts or you are not moving forward, complete the table below to track specific actions to:

- Reduce negative impacts and increase positive outcomes.

- Monitor actual or ongoing impacts.
- Record plans to improve data collection.
- Plan any further engagement or analysis that may be required.

Use the 'Status' column on the right to indicate whether the action is yet to start, is in progress, or has been completed.

Issue Identified	Action	Lead Officer	Completion Date	Status
Engagement with families	Consult with BSFH Parent/ Carer Voice Forum	Simon Topping	Autumn term 2026	Not started
Engagement with families	Consult with BSFH Local Steering Groups (which includes parent representation)	Simon Topping	Autumn term 2026	Not started
Engagement with families	Consult focus groups with families with the characteristics identified and impacted above.	Simon Topping	Autumn term 2026	Not started

11. Describe how you will monitor the actual, ongoing impact of the policy or proposal?

Following implementation of the in-house model quarterly/ annual service data will be monitored and analysed to determine if the anticipated benefits of the in-house model have been achieved. Appropriate monitoring arrangements will be maintained throughout implementation to ensure any unforeseen impacts are identified and addressed promptly.

SECTION F – SIGN OFF

	Signature	Date
Officer:	Simon Topping	17/08/2026
Reviewing Officer or Head of Service		17/08/2026

SECTION G – REVIEW

EIAs are live documents and should be reviewed regularly, especially if there are actions still to be completed or if the proposal has significant equality impacts.

When to review

- Review every 6 months until all actions in the Action Plan above are complete.
- If new data, feedback, or changes to the service arise, revisit the EIA to make sure it's still accurate.

Who should review

- The same officer who completed the EIA should carry out the review. If there's been a staffing change, the new lead officer should take over.

What to update

- Use the Status column in the Action Plan above to show progress (e.g. Not Started, In Progress, Completed). Add comments and updates in the table below — include any new data, evidence, or feedback.

When reviews can stop

- Once all actions are complete and no further equality impacts are expected, you can stop reviewing the EIA.
- Add rows to the table below as necessary until all actions are completed.

<u>Date of 1st Review:</u>	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	
<u>Date of 2nd Review:</u>	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	
<u>Date of 3rd Review:</u>	
Officer:	

Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	

	Cabinet 7 September 2026
	Report from the Corporate Director, Children and Young People and Community Development
	Lead Member - Cabinet Member for Children's Services, Employment and Climate Action (Councillor Jake Rubin)
Outcome of the informal consultation on amalgamation of Roe Green Infant School and Roe Green Junior School	

Wards Affected:	Queensbury
Key or Non-Key Decision:	Key Decision
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:	Two Appendix 1: Informal consultation document Appendix 2: Equalities Impact Assessment
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Shirley Parks Director, Education, Partnerships and Strategy 020 8937 4259 Shirley.parks@brent.gov.uk Michelle Gwyther, Head of Forward Planning, Performance and Partnerships 07388 859380 Michelle.Gwyther@brent.gov.uk

1.0 Executive Summary

- 1.1 This report provides Cabinet with a summary of the informal consultation undertaken between 22 June 2026 and 19 July 2026 on the proposal to amalgamate Roe Green Infant School and Roe Green Junior School as one primary school for children aged between 3 – 11, including provision for nursery aged children.

- 1.2 The report recommends a move to formal consultation through the publication of a statutory notice on the closure of Roe Green Junior School, the expansion of the age range at Roe Green Infant School and the change of name of Roe Green Infant School to Roe Green Primary School to achieve the amalgamation.
- 1.3 The proposal to amalgamate the schools has been put forward for the long-term benefit of children currently attending the schools and those who will attend in the future. The Local Authority's vision for the school is of one school, committed to high quality teaching and learning for all pupils in a nurturing environment. The amalgamation will support this vision by providing a unified school identity and school culture that will unite pupils, staff and families, fostering a deeper sense of shared purpose. Children will benefit from a seamless learning experience with continuity in curriculum, and teaching approaches built on collaboration and sharing of best practice and pastoral care. Pupils will also transition smoothly from early years through to Year 6. The amalgamation also allows for improved use of resources and effective use of budgets to enhance learning opportunities and experiences for all children.
- 1.4 A range of feedback was received during the informal consultation as set out below. Taking into consideration the responses received during the consultation, officers remain of the view that an amalgamation is in the best interests of children.

2.0 Recommendations

That Cabinet:

- 2.1 Notes the feedback received during informal consultation on the proposal to amalgamate Roe Green Infant and Roe Green Junior School.
- 2.2 Approves a period of formal consultation, through the publication of a statutory notice, on proposals to:
- Close Roe Green Junior School.
 - Expand the age range of Roe Green Infant School to admit children aged between 3 – 11.
 - Change the name of Roe Green Infant School to Roe Green Primary School.

3.0 Detail

3.1 Cabinet Member Foreword:

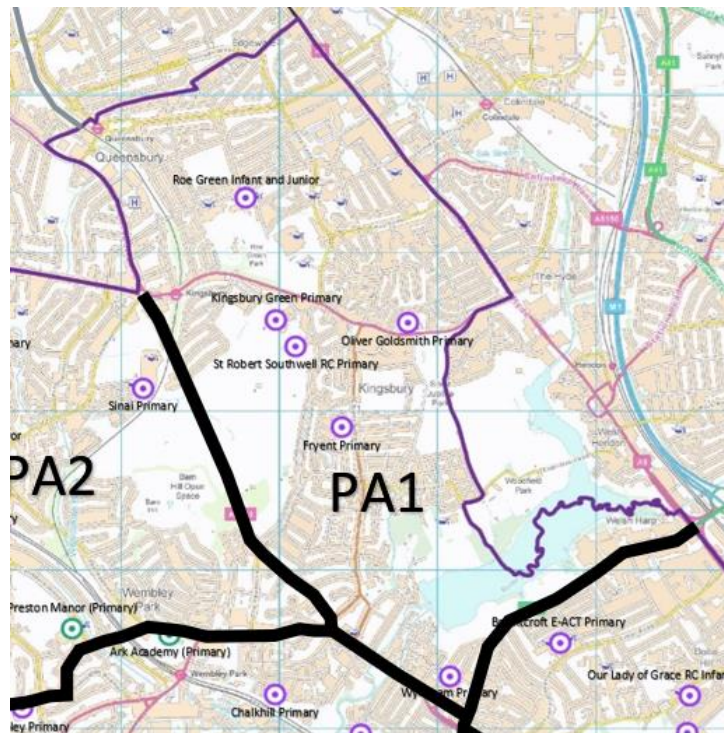
- 3.1.1 The Local Authority supports infant and junior schools who choose to amalgamate as this leads to many benefits for children, staff and the schools, including consistent leadership and teaching practices, as well as supporting the efficient use of school budgets and resources through economies of scale.

- 3.1.2 School organisation and place planning supports the Borough Plan Strategic Priority 4: The Best Start in Life, by ensuring there are sufficient school places for children and young people in Brent and supporting every child and young person to access local high-quality education in the borough.

3.2 Background

- 3.2.1 Roe Green Infant School and Roe Green Junior School are both located in the Queensbury ward and share the same building. The school building was originally opened as a primary school on 8 February 1932, and the school separated into the current Roe Green Infant School and Roe Green Junior School on 11 September 1933. This was a common at the time, as it was felt that growing populations required age-segregated schooling.
- 3.2.2 Roe Green Infant and Junior Schools currently operate as individual schools within the same building, and each has its own school leadership team and Governing Board.
- 3.2.3 Roe Green Infant and Junior Schools are both Community Schools, which mean they are maintained by Brent Council with the Council owning the buildings and the land. The Local Authority is responsible for determining the school admission arrangements for both Roe Green Infant and Junior Schools.
- 3.2.4 Following the retirement of the long-standing headteacher of Roe Green Junior School in April 2026, the Local Authority identified an opportunity to bring the two schools together under one leadership team and one governing board.
- 3.2.5 Roe Green Infant and Junior Schools are part of Primary Planning Area 1, and map 1 below shows the primary schools within this area. According to the latest available school roll projections from the Greater London Authority, demand for school places in Primary Planning Area 1 is projected to fall slightly across all year groups over the next 5 years. Although the Council's school place planning projections do not forecast individual school level demand, there is nothing to indicate an amalgamation of the two schools would have a negative impact on pupil demand in this area as this proposal does not remove or add capacity to the Primary school estate.

Map 1 – Map of Primary Planning Area One schools



- 3.2.6 Both of the Roe Green schools are popular, and Roe Green Infant School is regularly oversubscribed for each years' Reception intake. There are currently 347 pupils at the Infant School and 460 pupils at the Junior School, with each year group operating at or near its capacity of 120 places (four forms of entry) as shown in table 1 below. There were 108 members of staff employed across the two schools as of 1 March 2026.

Table 1: Numbers on roll (based on DfE attendance data)

	Roe Green Infant School			Roe Green Junior School			
Year group	Reception	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
Number of pupils	115	109	119	112	117	114	117

- 3.2.7 Within this context, on 22 June 2026, the Local Authority launched an informal consultation proposing the amalgamation of the schools.

3.3. The consultation process

- 3.3.1 The Local Authority follows statutory guidance set out by the DfE in ‘*Making significant changes (‘prescribed alterations’) to maintained schools (August 2025)*’. This sets out an expectation that interested parties are consulted informally prior to the publication of a statutory proposal and formal consultation. A period of informal consultation was carried out between 22 June 2026 and 19 July 2026.

- 3.3.2 An informal consultation document (see Appendix 1) was made available in hard and electronic form that outlined the proposals and relevant background information. Hard copies were made available from the reception desk of the two schools and on request from the Local Authority. An accompanying letter was sent to parents of all children attending both schools on 22 June 2026 with information about how to access the consultation document and submit a response to the proposal. This included information on how to access the consultation document in different language and format versions.
- 3.3.3 Information about the informal consultation and a survey about the proposals was included on the 'Have Your Say' consultation portal on the Brent Council website.
- 3.3.4 Staff and Governors at both schools were notified of the consultation through a letter from the Director, Education, Partnerships and Strategy and distributed via each school.
- 3.3.5 Three consultation meetings were hosted by Local Authority officers that provided parents/carers, staff, governors and members of the public both the opportunity to comment on and ask questions about the proposals. Two meetings with the public were held on 6 July at the Infant School and were attended by one person at each. A meeting was held on 9 July, also at the infant school, for the staff and governors of both schools that was attended by approximately 45 people. The Infant School was used for the meeting as this is located on the ground floor of the building and is therefore more accessible than the Junior School on the second floor.
- 3.3.6 Stakeholders were invited to respond to the consultation using the reply form included with the consultation document or online via the Council's 'Have your Say' portal or e-mailed. The reply form could be posted or sent to a dedicated e-mail address.
- 3.3.7 Respondents were invited to indicate whether they agreed or disagreed with the proposal to amalgamate the two schools and they were then invited to provide any comments. If respondents thought the proposal to amalgamate was a good idea, they were asked why. If respondents disagreed with the proposal to amalgamate, they were asked what concerns they had. All respondents were also asked if they wished to provide any other comments, highlight any issues, ask questions and provide alternative suggestions.

3.4. Responses from the consultation process

- 3.4.1 A total of 29 written responses were submitted to the Local Authority via Brent Council's 'Have Your Say' online consultation portal. No other responses were received by any other available means.
- 3.4.2. Table 2 details the consultation responses received and whether the responder agreed or disagreed with the proposal to amalgamate.

Table 2: View of respondents to the proposal for amalgamation

Views on the proposal for amalgamation	Number of responses received	Percentage of response overall
Agree with the proposal	27	93.1%
Disagree with the proposal	2	6.9%
No answer provided about the proposal	0	0%
Total responses	29	100%

3.4.3 The majority of the 29 responses received (93.1%) supported the proposal to amalgamate the two schools. 6.9% of respondents disagreed with the proposal.

3.4.4 Table 3 sets out how many respondents provided qualitative responses. Two additional respondents chose to state why they disagreed with the proposal without formally saying these disagreed with the proposal in the first question. While this increases the percentage of respondents who had some potential concerns to 13.8%, it remained a small number (4 out of 29). A further third of responses (31%) provided additional comments or asked questions on the consultation response form.

Table 3: Qualitative responses to the proposal for amalgamation

Qualitative responses to the proposal for amalgamation	Number of responses received	Percentage of response overall
If you like the proposal, please say why you think it is a good idea	21	72.4%
If you disagree with the proposal, please tell us why you are concerned.	4	13.8%
If you have any other comments, issues or questions, or have any alternative suggestions please state them here.	9	31.0%

3.4.5 21 respondents out of 29 provided a comment to say why they liked the proposal. Most respondents supported the proposal to bring the Roe Green Infant and Roe Green Junior Schools together as one school, stating that it made sense as the schools already share one building. The strongest themes were that the amalgamation proposal would:

- make the move from infant to junior much easier. Many liked that parents would no longer need to reapply for Year 3, describing the current process as unnecessary hassle and frustrating. Some suggested the amalgamation should have happened earlier.
- provide continuity for children, with respondents saying one school with one vision, one curriculum and one set of shared values would create a more seamless journey from Nursery/Reception to Year 6, with smoother transitions, more consistent learning and stronger relationships between pupils, families and staff.

- improve consistency in leadership, standards and cohesion, with a shared management, staffing and ethos. Some commented that the Junior School would benefit from the proposed changes and specifically from closer alignment with the Infant School's quality of leadership and education.
- Support more effective use of resources, including pooling staff expertise and creating a larger teaching team with a greater breadth of experience

3.4.6 Four respondents out of 29 provided an answer to the question 'If you disagree with the proposal, please tell us why you are concerned', although one of the responses simply said 'No' and only two respondents initially stated they disagreed with the proposal to amalgamate. 9 respondents left comments in the 'any other comments' section of the response form. The concerns raised are set out below, with responses in italics. There were that the amalgamation would:

- result in a loss of funding in the medium and long term for each separate school. One respondent suggested this was a way to reduce funding without it being obvious to the general public. Reassurance was sought by several respondents that any loss in funding would not adversely affect educational provision and sought greater clarity on how the future budget would be managed.

The amalgamation proposal is not designed as a mechanism to reduce funding. Any change in funding arises because a single merged school would no longer require two separate lump sum allocations, which are provided through the national funding formula to individual schools to help meet their fixed operating costs. Where two schools become one, many of those fixed costs are consolidated, meaning it is no longer necessary to fund the same functions twice.

The reduction in funding is therefore a consequence of the national funding formula operating as intended, rather than the objective of the proposal to amalgamate. The rationale for amalgamation is to create a more sustainable and efficient school structure, enabling resources to be focused on supporting pupils' education rather than maintaining duplicate administration, leadership and operational costs. While a merged school may receive less funding than two separate schools combined, this reflects the reduced costs associated with running a single school.

The reduction in funding will be managed through economies of scale – there will be no need for two headteacher salaries or commissioned services such as legal and HR advice. How the budget will be managed is set out in some detail in the 'Financial considerations' section of this report.

- impact on staff keeping their jobs.

The proposal to amalgamate the two schools would not result in any job losses. The amalgamated school would still operate in much the same

way as the current schools. The governing body and leadership team of an amalgamated primary school could consider at some point in the future to carry out a staffing review with a view to determining whether a restructure was required.

- have a negative impact on the safety, development and overall educational experience for younger pupils as they would have to mix with older pupils.

The amalgamation would not have any significant impact on how children were taught and would not be dissimilar to other Brent primary schools. Children would still be taught in fixed age year groups in the same areas, with separate play times. The leadership team of the school might identify opportunities where the whole school can come together, such as assemblies and sports day. However, the children would still be grouped with their peers and all safeguarding measures would remain in place.

3.4.7 Overall, responses focused on ensuring that the amalgamation delivers educational benefits for pupils while maintaining adequate resources, support and engagement with the school community. Respondents emphasised the importance of preserving the strengths, values and traditions of both schools, maintaining clear communication with parents, staff and pupils throughout the process and demonstrating how any financial efficiencies would be reinvested to benefit children. Some respondents asked for further information about practical arrangements, including pupil admissions and transition processes. The consultation document set out that applications would no longer be required for Year 3 admissions and pupils would transition from Year 2 automatically.

3.4.8 Suggestions were also made to expand after-school provision and extracurricular opportunities across all year groups, while one response raised concerns about previous support for pupils with additional needs. These are matters that for an amalgamated school leadership to address.

3.4.9 The two people who attended the public consultation meetings both indicated they were generally in favour of the proposal. Topics discussed included funding concerns, as addressed above, and questions about how other schools in Brent amalgamated.

3.4.10 At the meeting with staff and governors, which was attended by approximately 45 people, topics included:

- concerns around the impact the amalgamation may have on staffing and the impact of funding changes. It was made clear that details of the staffing structure following an amalgamation would be for the new governing board and senior leadership team to determine.
- Clarity was also sought on the consultation process. Officers explained that the informal consultation stage was to seek views from stakeholders on initial proposals which would then be refined, changed and/or finalised

before reported to Cabinet to make a decision on whether to proceed to formal consultation. The formal consultation would then set out the exact proposals.

- Representatives of the Governing Board of the Infant School raised concerns about recent retirements from the Governing Board of the Junior School and whether this would impact on the consultation process. They were reassured that this would not impact on the formal consultation process, if it was agreed by Cabinet.

3.5. Proposal

3.5.1. Having taken the feedback from the informal consultation into account, officers remain of the view that the amalgamation proposal is beneficial for the future of the Roe Green Schools. This view is well supported by stakeholders and concerns and questions raised during the informal consultation can be satisfactorily addressed or mitigated to reduce potential impacts on children and staff, as set out above.

3.5.2. The Local Authority is seeking to implement an amalgamation of Roe Green Infant School and Roe Green Junior School by:

- a) Closing Roe Green Junior School.
- b) Expanding the age range of Roe Green Infant School to admit children aged between 3 – 11.
- c) Changing the name of Roe Green Infant School to Roe Green Primary School.

3.5.3. Should it be agreed, the amalgamation would take place by the beginning of the autumn term in 2027.

3.5.4 At the point of amalgamation, children attending Roe Green Junior School will be transferred to the roll of Roe Green Primary School. Staff employed at Roe Green Junior School will have their employment transferred to Roe Green Primary School. Any future changes to the staffing structure would be for the new Governing Board to determine. It is noted that as Roe Green Junior School currently has two vacancies in their Senior Leadership Team, this represents a favourable time for amalgamation.

3.5.5 Following the amalgamation of the two schools, no further co-ordinated Junior admissions would be made into Year 3 at the school. Once the schools are amalgamated, children will progress automatically from Year 2 into Year 3 without the need for an application for, or offer of, a school place.

3.5.6 Parents of children in Year 2 during the 2026/27 academic year would still be expected to make applications for a place at Roe Green Junior School to start in September 2027, as the Local Authority cannot assume the amalgamation

will go ahead until a final decision has been made. Therefore, offers for the Junior School will be sent out on 16 April 2027, as normal.

- 3.5.7 If a decision is made to amalgamate the schools and the amalgamation is completed at the start of September 2027, any parent/carer who has received a co-ordinated Year 3 offer for a place for their child at Roe Green Junior School between 16 April 2027 and 31 August 2027 would be able to arrange admission for their child at Roe Green Primary School at the start of the autumn term 2027. Roe Green Primary School would not accept any further co-ordinated applications for starting junior school places in future academic years. Applications for Year 3 would be made via in-year applications only from September 2027.

4.0 Stakeholder and ward member consultation and engagement

- 4.1. An informal consultation was held from 22 June to 19 July 2026 which enabled staff, governors, parents, carers and local residents to have the opportunity to comment on and ask questions about the proposal to amalgamate Roe Green Infant School and Roe Green Junior School.
- 4.2. The Cabinet Member for Children's Services, Employment and Climate Action has been kept informed of the consultation process and ward members will be informed of the formal consultation process.

5.0 Financial Considerations

- 5.1 School funding received through the Dedicated Schools Grant (DSG) is largely driven by pupil numbers. Roe Green Infant School and Roe Green Junior School receive the majority of their income through the Dedicated Schools' Grant (DSG) allocation. Both schools have reported a surplus reserves balance at the end of March 2026.
- 5.2 In addition to pupil-led funding, all schools receive a lump sum allocation within their budgets to contribute towards fixed operating costs. Assuming the schools amalgamate in September 2027, the new school would receive funding equivalent to the combined formula funding of the predecessor schools, including both lump sum allocations, for the remainder of the 2027/28 financial year. Under current DfE guidance, the school would then retain 70% of the second lump sum in the first full financial year following amalgamation (2028/29). Based on a current lump sum value of £174,560 this would limit the reduction in funding to approximately £52,368 in that year.
- 5.3 In the second year following amalgamation, the local authority may apply for a further year of transitional protection. While the level of protection would be determined as part of that process, DfE guidance indicates that it would not normally exceed 40% of the second lumpsum. Unlike the first-year protection of at least 70% of the second lump sum, the second-year protection is not guaranteed, and this is subject to approval from the DfE, following consultation and approval by Brent schools via Schools Forum.

- 5.4 If the maximum level of protection was approved for the second financial year following amalgamation, based on the current lumpsum value of £174,560, the reduction in funding would be approximately £104,736 in that year. From the third and subsequent years, the reduction of the lump sum would be the full amount (currently £174,560).
- 5.5 The transitional protection period is intended to provide the school with time to realise efficiencies and align its staffing and operational structures so that it can operate sustainably once the protection arrangements cease.

6.0 Legal Considerations

- 6.1 The Local Authority has the power to consider and determine proposals published under Section 19 of The Education and Inspections Act 2006, pursuant to Section 21 (2) (f) of the Act and in accordance with Schedule 3 paragraph 3 of The School Organisation Regulations 2013.
- 6.2 Under sections 13 and 14 of The Education Act 1996, as amended by The Education and Inspections Act 2006, a local education authority has a general statutory duty to ensure that there are sufficient school places available to meet the needs of the population in its area. The Local Authority must promote high educational standards, ensure fair access to educational opportunity and promote the fulfilment of every child's educational potential. It must also ensure that there are sufficient schools in their area and promote diversity and increase parental choice. To discharge this duty, the Local Authority has to undertake a planning function to ensure that the supply of school places balances the demand for them.
- 6.3 The proposal to amalgamate the schools does not change the availability of school places in the area.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 The Public Sector Equality Duty under section 149 of the Equality Act 2010 requires the Local Authority 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 covered under the Act are age, disability, gender reassignment, marriage and civil partnership (only in respect of eliminating unlawful discrimination) pregnancy and maternity, race (this includes ethnic or national origins, colour or nationality) religion or belief (this includes lack of belief) sex and sexual orientation. Due regard means giving relevant and proportionate consideration to the duty, in that whenever significant decisions are being made consideration must be given to the impact/affect that implementing a particular decision will have in relation to equality before making that decision. Brent Council also has a policy of considering Human Rights and socio-economic impact.

- 7.2 An Equality Impact Analysis has been carried out on the proposals set out in this report and is provided as Appendix 2 to this report. It is not anticipated there will be any negative impact from these proposals on the basis of age, disability, gender reassignment, marriage and civil partnership (only in respect of eliminating unlawful discrimination) pregnancy and maternity, race (this includes ethnic or national origins, colour or nationality) religion or belief (this includes lack of belief) sex and sexual orientation. The proposal to amalgamate the schools is not anticipated to have any material effect on pupils or the wider community.
- 7.3 Based on the January 2026 Census, the top three ethnic groups attending the Roe Green schools (Any other white background - 36.3%, Indian - 24.6% and Any other ethnic group - 11.8%) match the top three ethnic groups for Primary Planning Area 1 (Any other white background - 27.4%, Any other ethnic group - 18.9% and Indian - 16.2%).
- 7.4 The proportion of children receiving benefits related Free School Meals at the schools is 11.6% compared to 17.6% for the whole of the local planning area. The proportion of children at the Roe Green schools with an Education Health and Care Plan is 3.0% compared to 5.6% across the whole planning area. The proportion of children at the Roe Green schools receiving SEN Support is 8.0% compared to 12.0% across the whole planning area.

8.0 Climate Change and Environmental Considerations

- 8.1 School place planning and admissions policies aim to ensure primary children can attend a local school and therefore can walk to school or take public transport. This approach underpins these proposals. Pupils and staff would continue to occupy the current Roe Green Infant and Junior Schools shared building following amalgamation. Like all schools in Brent, the new primary school would be able to access support to develop a sustainable travel plan.

9.0 Human Resources/Property Considerations

- 9.1 Should a decision be made to amalgamate the schools, this would lead to the closure of Roe Green Junior School, but there would be no property considerations. The land and assets of both schools already belong to the Local Authority as both schools are community schools.
- 9.2 The new school would be a community school and the Council would be the responsible body and employer from a Health and Safety and statutory compliance perspective for the primary school. The Council is already responsible for major capital investment for foundation and community schools, so this would not change in the event of an amalgamated Roe Green Primary School.
- 9.3 In community controlled schools, staff are employed by the Local Authority. Given both schools are community controlled, there will be no requirement for a Transfer of Undertakings (TUPE) exercise.

10.0 Communication Considerations

- 10.1 Formal consultation to change the provision is required under the statutory process for making significant changes (prescribed alterations) to maintained schools (Statutory Guidance for Proposers and Decision-makers, Department for Education, August 2025) and Opening and closing maintained schools (Statutory guidance for proposers and decision makers, Department for Education, May 2026).
- 10.2 As Roe Green Infant and Junior Schools are community schools, the Local Authority will continue to lead this process and has been the case for the informal consultation. The statutory consultation process for significant changes to school provision has four stages - Stage 1 Publication of a Statutory Notice, Stage 2 Representation (formal consultation for a period of 4 weeks), Stage 3 Decision and Stage 4 Implementation.
- 10.3 Cabinet is asked to approve publication of a statutory notice to commence the formal consultation process to:
- a) close Roe Green Junior School.
 - b) expand the age range of Roe Green Infant School to admit children aged between 3 – 11.
 - c) change the name of Roe Green Infant School to Roe Green Primary School
- 10.4 Subject to Cabinet approval, the statutory notice would be published in the Brent and Kilburn Times, on the Brent Council website (specifically the school admissions pages) and notices would also be physically displayed on the school gate. Stakeholders would be invited to submit written representations that set out their views and comments on the proposals.
- 10.5 Following the formal representation period, Cabinet is required to make a decision on this proposal within two months. The anticipated milestone dates following a decision by the Cabinet to approve the formal consultation to amalgamate the schools is set out below.

Table 4: Statutory Process and Implementation Milestones

Date	Action
21 September 2026	Publication of statutory proposal notice and formal consultation
18 October 2026	Formal consultation closes
07 December 2026	Final decision by Cabinet
04 January 2027	Preparation to amalgamate schools
01 September 2027	Amalgamation of the schools is completed

Related document(s) for reference:

[School Place Planning Strategy 2024 – 2028 2nd Refresh Cabinet Report 17 November 2025](#)

Report sign off:

Nigel Chapman

Corporate Director, Children, Young People and
Community Development

Legal considerations provided by:
Ovril Tomlinson

Finance considerations provided by:
Folake Olufeko



Brent



A Public Consultation

**Proposal to Amalgamate
Roe Green Infant School and
Roe Green Junior School
Princes Avenue, Kingsbury, London, NW9 9JL**

**Consultation period:
Monday 22 June 2026 to
Sunday 19 July 2026**

Introduction

Brent Council and the governing bodies of Roe Green Infant School and Roe Green Junior School are proposing to undertake a consultation on the future organisation of the Roe Green schools as a combined primary school. To start this process the local authority and the governing bodies of the two schools are carrying out an informal consultation to gather views from staff, pupils' families, local residents living near the school and relevant stakeholders.

What is the proposal?

Brent Council, working with the governing bodies of the two schools, is seeking your views on the proposal to amalgamate Roe Green Infant and Junior Schools. This is a unique opportunity to bring two good schools together as a single educational institution. The combined school would build on the existing strengths and good practice within both schools, and over time there would be opportunities to further enhance whole school approaches to improve teaching and learning across all key stages.

The proposal is that Roe Green Infant and Junior Schools are joined together to form one combined primary school from an agreed date (which could be 1 September 2027). The amalgamated school would continue to use the existing buildings and site of the current schools, based at Princes Avenue, Kingsbury, London, NW9 9JL. The amalgamated school would continue to provide 840 places in Reception to Year 6 (120 per year group).

What would be the name of the school?

It is proposed the school is called Roe Green Primary School.

What are the benefits of amalgamation?

- Amalgamating the schools removes the need to reapply for Year 3 entry when moving from Year 2 to year 3. There would be no need for parents to apply for a place in the junior school, which can bring uncertainties depending on demand.
- All through primary schools make transition between Key Stage 1 and Key Stage 2 easier. Pupils will have better continuity as they continue their education, supporting improved attainment.
- One governing board would be responsible for operating the school resulting in consistency of leadership, vision and teaching across all age groups from 4 to 11 years old.

- Decisions around the use of buildings and any future capital investment in buildings would apply to the school as a whole rather than only one school, reducing any duplication and ensuring maximum benefit for any funding spent on the school.
- The combined school would benefit from collaborative working across staffing structures within both schools, cutting down on duplication which could bring financial benefits. This would also allow for linked software systems as well as savings through purchase of resources in larger quantities.
- A potential reduction in administration and statutory reporting. For example: one budget, one pupil premium report, one Ofsted inspection, and one set of contracts.

Costs of Amalgamation

- Whilst most income depends on the total number of pupils, Roe Green Infant and Roe Green Junior schools currently also receive individual "lump sums" and sports premium grants. If both schools amalgamate on 1 September 2027, the new school will receive funding equivalent to the formula funding of the closing schools added together for the appropriate proportion of the year. This means that they receive the combined lump sums for the remainder of the 2027/28 financial year and 70% of the second lump sum in the following year 2028/29 and no additional or second lumpsum in 2029/30 financial year from April 2029. The lumpsum from the sports premium grant will reduce from a combined sum of £32k to £16k from April 2028.
- The loss of income of approximately £66k in the financial year 2028/29, would be approximately 1% of the total budget share of the combined schools and could be at least partially mitigated by cost savings resulting from reduced overheads, economies of scale and through the generation of additional income.

How would an amalgamation be implemented?

In order to amalgamate the two Roe Green Schools it is proposed to close one school and expand the age range of the other school. The combined school would remain as a community school, which will continue to be a local authority maintained school. As a community school, the combined school would be able to prioritise social inclusion and offer tailored support for disadvantaged students. As a community school the local authority would continue to support the combined school, which may also have access to additional funding streams and resources, potentially leading to improved facilities and educational opportunities for students.

In previous amalgamations that the council has led on, it has been the junior school that has been closed to allow the amalgamation to take place. Therefore, for consistency of approach it is proposed Roe Green Infant School will be expanded and

Roe Green Junior School would close. The new school would then be one Primary School. As a community school, the combined school would retain the same DfE number as the current Roe Green Infant School.

What would an amalgamated school look like?

Roe Green Infant School would increase the age range of children it accepts up to 11 years old (Year 6) and would then change its name to *Roe Green Primary School* to reflect that it educates a wider age range. At the same time Roe Green Junior School would formally close. Roe Green Primary School would provide 120 place per year group and a total of 840 places.

All children on roll at the junior school at the point of amalgamation would continue as pupils of Roe Green Primary School. There would no longer be the requirement for parents/carers to apply for a place for a place at the junior school at the end of Year 2.

There would be one school occupying the existing buildings on the site – it is likely that Early Years and KS1 pupils would initially continue to be taught on the former infant school site while KS2 pupils continue on the former junior school site, although there would be the potential for change in the future if this suits the school community. The 'new' Roe Green Primary School would be led by one headteacher with one senior leadership team.

All staff would be employed by the 'new' Roe Green Primary School with any transfer governed by relevant Human Resource (HR) policies and subject to consultation with all staff and their professional associations/unions if this was identified as required and applicable. Although we do not anticipate any change to the staffing structure for teaching roles, it will be necessary to review the other staffing structures to ensure they are fit for purpose.

There would be one governing body responsible for the combined school.

From the time of the amalgamation, there would be a new budget for the school calculated in accordance with the Brent schools funding formula, which is essentially based on an amount per pupil.

When would an amalgamation happen?

The amalgamated school could be established from 1 September 2027, subject to the statutory consultation process and the implementation of relevant HR processes.

What would be the impact of the amalgamation?

The amalgamation will cause little disruption to pupils or the wider community. The two schools would be able to share resources to benefit from economies of scale through one headteacher, with staff working across all age groups within the school, and one set of systems.

Families of pupils attending Year 2 at the Roe Green Primary School would no longer be required to submit an application to the local authority to secure a place in Year 3 as all pupils will automatically transition between these two year groups. While the proposals are underway, and until the amalgamation takes place on the agreed date, the local authority will continue to co-ordinate applications to Roe Green Junior School for September 2027. Any offers made will be transferred so children can start or continue at Roe Green Primary School if the amalgamation is completed by this time.

The amalgamated school would continue to use the local authority's determined admissions arrangements for determining how children should be admitted at the start of Reception and in-year. The criteria for admissions to Year 3 at Roe Green Junior School would no longer apply.

The Roe Green Primary School will remain on the same site as the existing infant and junior schools. There are no proposals to change the physical size of the school, or to change the use of any part of either school site, as part of the amalgamation.

The consultation process

The informal consultation will start on **Monday 22 June 2026**, will run for four weeks and will end on **Sunday 19 July 2026**.

The closing date for online responses is Sunday 19 July 2026 and any hard copies returned by hand or post must be submitted to either Roe Green school office by Friday 17 July 2026.

How can I make comments about the proposals?

Parents, carers, staff, governors and members of the public are invited to send their comments by replying using the online feedback form available at www.brent.gov.uk/neighbourhoods-and-communities/have-your-say

Public meetings have been arranged for any stakeholders or interested parties to attend.

Public meeting: Monday 6th July 2026
Venue: Roe Green Infant School Hall
Time: 9.30 – 10.30am

Public meeting: Monday 6th July 2026
Venue: Roe Green Junior School Hall
Time: 5.30 – 6.30pm

A consultation meeting has been arranged specifically for the staff and governors of both schools – the public cannot attend this meeting.

Staff meeting: Thursday 9th July 2026
Venue: Roe Green Junior School Hall
Time: 4.00 – 5.00pm

Comments made at the meetings will be recorded in written format and will contribute to the consultation outcomes.

How will the decision about the proposed amalgamation and expansion of the schools be made?

After the informal consultation is complete, all the responses regardless of whether they are comments in support of the proposal, objections, or other suggestions will be collated and considered by the Local Authority and the governing body of both schools.

A report will be prepared for Brent Council's Lead Member for Cabinet Member for Children's Services, Employment and Climate Action to consider all the responses and decide if the local authority should progress to a formal (statutory) consultation. This process will commence with the issuing of a statutory notice which outlines exactly what the proposals are and lasts for four weeks. Following any formal consultation, Brent Council will make a final decision on whether the schools should amalgamate and the date of when this should happen.

Where can I get further information or assistance?

Should you require assistance with this consultation, please contact either of the school offices.



INFORMAL CONSULTATION RESPONSE FORM

Proposal to Amalgamate Roe Green Infant School and Roe Green Junior School

The proposal is to bring Roe Green Infant School and Roe Green Junior School together as one merged primary school from an agreed date (which could be 1 September 2027). The newly formed primary School would use the existing buildings and site as the current schools, based at Princes Avenue, Kingsbury, London, NW9 9JL.

We welcome your views on this proposal. Please fill in this form and return it to either school office no later than Friday 17 July 2026. You can also complete the form online at www.brent.gov.uk/neighbourhoods-and-communities/have-your-say where responses must be received by 11.59pm on Sunday 19 July 2026.

1. Do you agree with the proposal to amalgamate our two schools to become one school?

Please circle/ delete as appropriate:

YES / NO

2. If you like the proposal, please say why you think it is a good idea:
3. If you disagree with the proposal, please tell us why you are concerned:
4. If you have any other comments, issues or questions, or have any alternative suggestions, please state them here (you can continue on the back of this form if necessary).

Appendix 2:

EQUALITY IMPACT ASSESSMENT (EIA)

POLICY/PROPOSAL :	Amalgamation of Roe Green Infant School (Community) and Roe Green Junior School (Foundation)
DEPARTMENT:	Children, Young People and Community Development
TEAM:	Access to Education and Travel Assistance, Forward Planning, Performance and Partnerships Service
LEAD OFFICER:	Michelle Gwyther
DATE:	21 July 2026

EIA Guidance is available online, please reach out to equality@brent.gov.uk for any further support.

SECTION A – SCREENING

1. Briefly and clearly describe the policy, proposal, change, or initiative, and what it is trying to achieve.

The local authority is proposing the amalgamation of Roe Green Infant School and Roe Green Junior School. The proposal would be achieved by closing the junior school, expanding the age range of the infant school to take children up to 11 years old, changing the name to Roe Green Primary School and transferring children on roll at the junior school to the primary school roll. The intended outcome is that the two schools combine to become one primary school and operate as such in the future.

2. Are there any groups who may be impacted by your proposal? For reference, Q4 lists all protected groups.

Pupils
Parents and carers of children who attend Roe Green Infant and Junior Schools
Residents in the Queensbury Ward
Staff/contractors based at Roe Green Infant and Roe Green Junior School
Governing Board of Roe Green Infant School
Governing Board of Roe Green Junior School

3. If no groups are affected, explain why.

Not applicable

4. Mark with an “X” the potential impact of the policy or proposal on different groups. You can mark more than one box for each group.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age - People of different age groups.		X	
Care Experience - People who have been in care for any period of their childhood.		X	
Disability - People with physical, sensory, learning, and mental health disabilities, long-term conditions, and non-visible disabilities.		X	
Gender reassignment - Transgender and non-binary people, including anyone who is proposing to, started, or who has completed a process to change their gender.		X	
Marriage and Civil Partnership - Applies mainly in the workplace, people who are married or in a civil partnership.		X	
Pregnancy and Maternity - People who are pregnant, on maternity leave, or new parents.		X	
Race and Ethnicity - People of different ethnicity, nationality, and skin colour.		X	
Religion or belief - People of all faiths, and those with no religious belief.		X	
Sex - Differences between men and women, including disparities in pay, career progression, and health outcomes.		X	

Sexual Orientation - People who identify as lesbian, gay, bisexual, queer, asexual, or any other non-heterosexual identity.		X	
Socio-Economic Status – People who are experiencing poverty or socio-economic disadvantage.		X	
Other relevant groups* <i>[replace this text and specify where appropriate]</i>		X	

* Other relevant groups could include Carers, Refugees or Asylum Seekers, Veterans, among others. Review the EIA Guidance for more information.

5. Complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Does the policy or proposal have implications for eliminating discrimination, advancing equality of opportunity, or fostering good relations among different groups?		X
Does it relate to an area with known inequalities?	X	
Would it add, change, or remove services used by any groups listed in Q4?		X
Does it have negative or positive equality impacts on any groups listed in Q4?		X
If you have answered YES to ANY of the above, proceed to section B. If you have answered NO to ALL the above, proceed straight to section C.		

SECTION B – IMPACTS ANALYSIS

6. What data and evidence have you used to understand potential impacts? This could include service user data where relevant. If there is little or no evidence, explain why, and note any plans to improve data collection in future, adding this to the Action Plan in Section E.

Roe Green Infant and Junior Schools operate under separate governance and leadership. The schools are located on the same site.

The proposed amalgamation would have the effect of uniting the children and staff in one school based at the same site. There would be no impact on the day to day running of the school as children and staff would continue in the same classes and be taught in the same buildings.

Roe Green Infant School and Roe Green Junior School serve the same geographic area and occupy the same site. The proposed amalgamation of the schools would not displace any pupils, or have any impact on travel, and would therefore have no impact on the community. The amalgamation would provide certainty of progression to the junior phase of education, offering an all-through primary education.

The amalgamation of the two schools would result in a tapered reduction of funding over three years, and then continuing at the lower level, due to the loss of an individual lump sum currently allocated to each school. The new primary school would only receive one lump sum, with an eventual reduction in the annual budget of £174,560. Amalgamation of the schools would, however, deliver significant opportunities to identify economies of scale. There should be no impact on the future Governing Board's ability to continue to run a balanced budget. If any further impacts on the school's funding or staffing levels are identified, then this Equalities Impact Assessment will be revisited.

This proposal forms an amalgamation and therefore no pupils would be displaced. From the implementation date, pupils currently at Roe Green Junior School would have places at the expanded Roe Green Infant School (which will be renamed as Roe Green Primary School). Pupils in Year 2 at the time of the amalgamation would automatically transition to Year 3 the following September.

Depending on the timing of the amalgamation, there may be an impact on school admissions to the Junior School. Any applications or offers for the junior school would need to be amended as the Junior School would no longer be open for co-ordinated admissions to Year 3 the following September. The vast majority of applications received for Roe Green Junior School come from parents of children attending Year 2 in Roe Green Infant School. These children would be able to automatically continue in Year 3 at Roe Green Primary School, so would not be affected. There may be applications received from parents whose children do not attend Roe Green Infant School. In this case, the parents would be offered a place to start at Year 3 at Roe Green Primary School.

If a decision to amalgamate is confirmed, information and advice for parents will be provided in the 2027 Starting Primary School brochure provided by Brent Council.

7. For each characteristic:
- Provide detail for the impact listed in the response to Q4 in the left-hand box.

- b. Provide data and evidence to explain how you reached your conclusion in the right-hand box.

Relevant data sources for Brent and its residents can be found in the EIA Guidance document.

Age	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal will not disproportionately impact any person on the basis of age	From the implementation date of the amalgamation, pupils currently at Roe Green Junior School would have places at the expanded Roe Green Infant School (to be known as Roe Green Primary School). Pupils in Year 2 at the time of the amalgamation would automatically transition to Year 3 the following September. Any parents receiving an offer of a place at the junior school in September 2027 would be able to arrange for their child to start in Year 3 at the primary school if the amalgamation takes place, as planned at the start of the autumn term 2027. Information would be provided in the Starting Primary School September 2027 brochure (published September 2026) to advise potential applicants that the school may close after offers have been made and how offers for the school would be honoured.

Care Experience	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal will not disproportionately impact any person on the basis of care experience	Admission arrangements for the primary school would be the same as the arrangements currently in place at the infant and junior school (with the exception that year 3 admissions will no longer be co-ordinated as a normal point of entry, but as in-year instead). Looked after children and previously looked after children would retain the highest priority to be admitted to the school in any year group.

Disability	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.

The proposal will not disproportionately impact any person on the basis of disability	The proportion of children at the Roe Green schools with an EHCP is 3.0% compared to 5.6% across the whole planning area. The proportion of children at the Roe Green schools receiving SEN Support is 8.0% compared to 12.0% across the whole planning area. The proposal would not disproportionately impact any person on the basis of their disability, as appropriate provision for children with Special Educational Needs and Disability would continue. Children with an EHCP naming Roe Green Junior School would have their plans updated to reference Roe Green Primary School as their named school. Officers would liaise with SEND officers prior to amalgamation to ensure this change was identified.
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Gender Reassignment	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal will not disproportionately impact any person on the basis of gender reassignment	Not applicable

Marriage and Civil Partnership	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal will not disproportionately impact any person on the basis of marriage and civil partnership	Not applicable

Pregnancy and Maternity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.

The proposal will not disproportionately impact any person on the basis of pregnancy and maternity	Not applicable
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Race and Ethnicity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal will not disproportionately impact any person on the basis of race and ethnicity	The top three ethnic groups attending the Roe Green schools (Any other white background 36.3% Indian 24.6% and Any other ethnic group 11.8%) match the top three ethnic groups for Primary Planning Area 1 (Any other white background 27.4%, Any other ethnic group 18.9% and Indian 16.2%). Other schools in the primary planning area also have diverse intakes and it is not considered that amalgamating the schools would have a negative impact on the basis of race. Information about a formal consultation will be available to parents in each of the top three languages spoken at the school. The Brent website has translation functions built in which are capable of translating information into 240 different languages.

Religion or Belief	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal will not disproportionately impact any person on the basis of religion of belief	Roe Green Infant and Junior Schools are non-denominational. There are both non-denominational and faith schools in the area so there is local choice for parents / carers.

Sex	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.

The proposal will not disproportionately impact any person on the basis of sex	Not applicable
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Sexual Orientation	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal will not disproportionately impact any person on the basis of sexual orientation	Not applicable

Socio-Economic Status	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal will not disproportionately impact any person on the basis of socio-economic status	Admission arrangements for the primary school would be the same as the arrangements currently in place at the infant and junior school (with the exception that year 3 admissions would no longer be co-ordinated as a normal point of entry, but as in-year instead). These admission arrangements are based on set criteria which do not take into account the socio-economic status of any applicant (with the exception that children of staff may be prioritised in the arrangements).

Other Relevant Groups	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal will not disproportionately impact any person belonging to other relevant groups	Not applicable

8. Summarise any engagement activities with relevant groups (this may replicate some of the information listed in Q7). State whether those involved represent the people affected by your proposal, or whether more engagement is needed, which should be added to the Action Plan in Section E.

Informal consultation with stakeholders was carried out between 22 June 2026 and 19 July 2026. 29 responses were received, two members of the public attended public consultation meetings and approximately 45 staff members and governors attended a separate meeting held at the school. 93% of respondents to the consultation were supportive of the proposal. Any concerns identified throughout the consultation were referenced and responded to in the Cabinet paper recommending the proposal is taken to formal consultation.

A formal statutory consultation, planned to run for four weeks in the autumn term 2026 (subject to Cabinet approval), will provide stakeholders an opportunity to comment on defined proposals.

9. Provide more detail on any areas identified as requiring further data or detailed analysis.

Not applicable

SECTION C – CONCLUSIONS

10. Summarise your overall conclusions based on the analysis:

- If there are no impacts, state that here, and **do not complete sections E or G.**
- If you decide not to move forward, explain why, and **do not complete sections E or G.**
- If there are negative impacts, explain what you'll do to reduce them. If you choose to continue despite negative impacts, or if negative impacts remain following your action plan, provide a justification for your decision.
- If there are positive impacts, explain how these could be strengthened, where possible.

Based on current data analysis and information, officers are of the view it is appropriate to proceed with formal consultation on the amalgamation of Roe Green Infant School and Roe Green Junior School.

SECTION D - RESULT

Select one of the following options with an "X".		
A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	

C	CHANGE/ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN AND MONITORING

Unless your proposal has no equality impacts or you are not moving forward, complete the table below to track specific actions to:

- Reduce negative impacts and increase positive outcomes.
- Monitor actual or ongoing impacts.
- Record plans to improve data collection.
- Plan any further engagement or analysis that may be required.

Use the 'Status' column on the right to indicate whether the action is yet to start, is in progress, or has been completed.

Issue Identified	Action	Lead Officer	Completion Date	Status
Review concerns and issues raised during informal consultation	Inform the final proposal and if agreed, the implementation plan to be taken forward	Michael Rollin Michelle Gwyther	July 2026	Completed
Establish a clear implementation plan, working with the school leadership team and governing board	To mitigate any negative impacts	Michael Rollin with support from other services	January 2027	Not yet started

11. Describe how you will monitor the actual, ongoing impact of the policy or proposal?

If the proposal is taken forward and Cabinet agree to amalgamate the two schools, a steering group will be established comprised of council staff from across CYPCD and senior school leaders.

SECTION F – SIGN OFF

	Signature	Date
Officer:	Michael Rollin	21/07/2026
Reviewing Officer or Head of Service	Michelle Gwyther	24/09/2026

SECTION G – REVIEW

EIAs are live documents and should be reviewed regularly, especially if there are actions still to be completed or if the proposal has significant equality impacts.

When to review

- Review every 6 months until all actions in the Action Plan above are complete.
- If new data, feedback, or changes to the service arise, revisit the EIA to make sure it's still accurate.

Who should review

- The same officer who completed the EIA should carry out the review. If there's been a staffing change, the new lead officer should take over.

What to update

- Use the Status column in the Action Plan above to show progress (e.g. Not Started, In Progress, Completed). Add comments and updates in the table below — include any new data, evidence, or feedback.

When reviews can stop

- Once all actions are complete and no further equality impacts are expected, you can stop reviewing the EIA.
- Add rows to the table below as necessary until all actions are completed.

<u>Date of 1st Review:</u>	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	

<u>Date of 2nd Review:</u>	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	
<u>Date of 3rd Review:</u>	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	

Report sign off

Nigel Chapman

*Corporate Director Children, Young People and
Community Development*

 Brent	Cabinet 7 September 2026
	Report from the Corporate Director, Children, Young People and Community Development
	Lead Member – Cabinet Member for Children’s Services, Employment and Climate Action (Councillor Jake Rubin)
Proposal to expand Phoenix Arch Special School on the Strathcona site	

Wards Affected:	Preston
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
List of Appendices:	Two Appendix 1: Statutory Notice Appendix 2: Equalities Impact Assessment
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Shirley Parks Director, Education, Partnerships and Strategy 020 8937 4259 Shirley.parks@brent.gov.uk Roxanna Glennon, Head of Inclusion 020 8937 2785 Roxanna.glennon@brent.gov.uk

1.0 Executive Summary

- 1.1 This report provides a summary of the formal consultation undertaken between 30 June 2026 and 27 July 2026 on a proposal to expand Phoenix Arch Special School by 50 places using the Strathcona site (Strathcona Road, Wembley, HA9 8QL). The proposal responds to increasing demand for special school places across the borough for children who present with autistic spectrum condition (ASC).

- 1.2 Formal consultation involves publication of a statutory notice (Appendix 1) and the opportunity for written responses, of which only 3 have been received. The report, therefore, recommends that Cabinet determines the statutory notice to expand Phoenix Arch Special School by 50 pupils through use of the Strathcona site in September 2027.

2.0 Recommendations

That Cabinet:

- 2.1 Notes the responses received during formal consultation on the proposal to expand Phoenix Arch Special School.
- 2.2 Approves the expansion of Phoenix Arch Special School by 50 places utilising the Strathcona site from September 2027.

3.0 Detail

3.1 Cabinet Member Foreword:

- 3.1.1 This proposal will deliver an additional 50 local school places for children and young people with Special Educational Needs and Disabilities (SEND) to meet increasing demand, as set out in the School Place Planning Strategy 2024-28 2nd refresh approved by Cabinet in November 2025. Use of the Strathcona site for additional specialist places for children with SEND was identified in a report to Cabinet in January 2026 setting out a second phase of SEND capital investment. The proposal will use the expertise of staff at Phoenix Arch Special School, a community special school, to support more children with ASC to attend a local school rather than provision out-of-borough.
- 3.1.2 School organisation and place planning supports the Borough Plan Strategic Priority 4: The Best Start in Life, by ensuring there are sufficient school places for children and young people in Brent and supporting every child and young person to access local high quality education in the borough that meets their needs.

Background

- 3.1.3 The report to Cabinet in June 2026 seeking agreement to undertake formal consultation on the expansion of Phoenix Arch Special School provided detailed background on the increasing demand for local special school places that underpins the proposal. The number of children with an Education, Health and Care Plan (EHCP) has continued to increase annually as set out in the School Place Planning Strategy 2024-2028 2nd Refresh approved by Cabinet in November 2025. There are currently 4420 children and young people with an EHCP (July 2026), reflecting a 10% increase over the past year. Needs associated with communication and interaction (CI), which includes children with ASC, predominate with 58% of the cohort having CI as their primary area of need.

- 3.1.4 While currently 48% of children with an EHCP attend a mainstream school, 37% of primary aged children and 49% of secondary aged children with an EHCP require a special school place. Many of these children attend special schools in Brent, but there are circa 250 Brent children with an EHCP placed in independent special schools and circa 210 placed in out-of-borough maintained special schools, alongside children receiving home tuition or attending mainstream schools waiting for a special school placement. As well as not supporting children to be part of their local community and being less convenient for pupils who must travel longer distances to school, out-of-borough and independent schools are putting increasing strain on the Dedicated Schools Grant (DSG) High Needs Block and the General Fund schools transport budgets.
- 3.1.5 In January 2026, Brent Cabinet received a report setting out plans to provide more local special school places as a second phase of the Capital Investment Programme for School Place Sufficiency for Children and Young People with SEND, following successful delivery of 382 additional places. The report set out a business case for a programme of five special school expansion projects that would deliver 212 places, including use of the Strathcona site as a local special school satellite (50 place) subject to consultation.
- 3.1.6 Phoenix Arch Special School is located in Wembley at Drury Way, London, NW10 0NQ. Phoenix Arch is a local authority maintained special school with a current roll of 55 pupils. The school's building and land are owned by the Council. All children who attend Phoenix Arch have a diagnosis of autism spectrum condition (ASC). Some children who attend Phoenix Arch also have learning disabilities (LD).
- 3.1.7 The Strathcona site, located at Strathcona Road, Wembley, HA9 8QL, is owned by the Council. It is currently vacant, having been most recently used as a temporary location for Wembley Manor Special School while its building on London Road was under construction. Before this, the Strathcona site was used for primary school provision (under the leadership of Roe Green Infant School). The proposal to expand Phoenix Arch onto a former school site carries the added advantages that minimal capital works and time are required to create a provision of the highest quality, representing the potential to achieve excellent value for money.

3.2 Responses to the Formal Consultation

- 3.2.1 The statutory guidance set out by the DfE in 'Making significant changes ('prescribed alterations') to maintained schools (October 2024)' have been followed in taking the proposal forward. This recommends informal consultation prior to the statutory consultation process for significant changes that has four stages - Stage 1 Publication of a Statutory Notice, Stage 2 Representation (formal consultation for a period of 4 weeks), Stage 3 Decision and Stage 4 Implementation. Cabinet is required to make a decision on the proposal within 2 months of the formal consultation.

3.2.2 In June 2026, following a period of informal consultation (9 March 2026 and 20 April 2026), Cabinet agreed to move to formal consultation on the proposal to expand Phoenix Arch Special School using the Strathcona site. A statutory notice was published on 30 June triggering a 4-week period of formal consultation on the expansion of Phoenix Arch Special School onto the Strathcona site, specifically on the change in the number of pupils in a special school (Appendix 1). The establishment of a satellite site does not, on its own, require the statutory process to be followed.

3.2.3 During the formal consultation, a total of 2 responses were received via Brent Council's 'Have Your Say' online consultation portal, compared to 15 during the informal consultation. One respondent said they agreed with the proposal and one did not indicate if they supported it or not. The only comment received was in support of the proposal, stating it would provide better services for a disadvantaged group and reduce travel times linked to out-of-borough school placements.

3.2.4 Alongside these responses, the Director of Education, Partnerships and Strategy received an email from the Chair of the South Kenton Preston Park Residents Association (SKPPRA) requesting a copy of the Transport Assessment mentioned in the detail of the statutory notice, which was subsequently provided on 27 July 2026. A late response from the Chair of SKPPRA was received on 29 July 2026, which has been accepted as a formal written representation. The response:

- raises a range of questions about the robustness of the travel survey that has been carried out and refers to previous experience of schools in the local area expanding without sufficient consideration of parking demand, with consequent negative impacts for local residents.

The Council recognises that further work in relation to travel implications will need to take place during design development of the site's use for special provision and implementation planning, noting the concerns of residents and the need for mitigation measures to minimise impacts on the local community. The site is close to tube stations (South Kenton and Preston Park) and local bus routes, the use of which by school staff will be encouraged and included in a sustainable travel plan.

- argues that the proposal is flawed and that the Strathcona site is not appropriate for SEND provision, that the area has among the lowest SEND need in the borough, and that there is no clarity on how the provision will work with the new SEND facilities at Preston Park. Many of these issues were raised during the informal consultation meeting.

While Preston Ward does not have the highest prevalence in the borough of children and young people with SEND, specialist SEND provision is planned on a borough-wide basis. The Phoenix Arch provision on the Strathcona site will be for children with ASC for whom mainstream schools would not be suitable. This includes the Additionally Resourced Provision

at Preston Park Primary School that is for pupils who can spend a proportion of their time in mainstream classes.

3.3 Overview of the Proposal

- 3.3.1 Having taken responses to both the formal and informal consultation into account, the Governing Board and Local Authority officers remain of the view that the proposal is beneficial for children across the borough.
- 3.3.2 Cabinet is therefore asked to determine the statutory notice and approve the expansion of Phoenix Arch Special School by 50 places utilising the Strathcona site in September 2027.

4.0 Stakeholder and ward member consultation and engagement

- 4.1. An informal consultation was held from 9 March 2026 and 20 April 2026 which enabled staff, governors, parents, carers and local residents the opportunity to comment on and ask questions about the proposal to expand Phoenix Arch Special School by 50 places utilising the Strathcona site.
- 4.2. A period of formal consultation was carried out between 30 June 2026 and 27 July 2026. A statutory notice (Appendix 1) was displayed adjacent to the main school gates of the school and placed on Brent consultation portal on the local authority's website.
- 4.3 The Cabinet Member for Children's Services, Employment and Climate Action has been kept updated throughout the statutory consultation process.
- 4.4 The Preston Ward members were notified of the report to Cabinet in June 2026 summarising the informal consultation on the proposal and of the subsequent publication of the statutory notice triggering formal consultation.

5.0 Financial Considerations

- 5.1 This expansion forms a key element of the local authority's strategy to manage rising demand for specialist provision funded by the Dedicated Schools Grant High Needs Block, as set out in the Phase II Capital Investment Programme for School Place Sufficiency for Children and Young People with SEND (Cabinet Report, January 2026). The creation of 50 additional places at Strathcona site is intended to reduce reliance on higher cost out-of-borough and independent placements.
- 5.2 The financial case is supported by the differential in placement costs. The average cost of in-borough special school placement is £37,000 compared to £38,000 for an out of- borough maintained special school placement (not including any additional transport costs), with independent placements averaging significantly higher at £58,000 per place per annum.
- 5.3 By increasing in-borough capacity, the proposal supports cost avoidance through the provision of local placements at a lower average cost. Once fully

operational, the expanded provision is expected to deliver annual cost avoidance of approximately £1.05m, based on the cost differential between independent and maintained special school placements, assuming children with comparable levels of need are accommodated within the new local provision. This will contribute towards reducing financial pressures within the High Needs Budget, which currently has a cumulative deficit of £20.2m.

6.0 Legal Considerations

- 6.1 The Local Authority has the power to consider and determine proposals published under Section 19 of The Education and Inspections Act 2006, pursuant to Section 21 (2) (f) of the Act and in accordance with Schedule 3 paragraph 3 of The School Organisation (Establishment and Discontinuance of Schools) Regulations 2013.
- 6.2 Under sections 13 and 14 of The Education Act 1996, as amended by The Education and Inspections Act 2006, a local education authority has a general statutory duty to ensure that there are sufficient school places available to meet the educational needs of the population in its area. In fulfilling this duty, the Local Authority must promote high educational standards, ensure fair access to educational opportunity and promote the fulfilment of every child's educational potential. It must also ensure that there are sufficient schools in their area and promote diversity and increase parental choice. To discharge this duty effectively, the Local Authority is required to undertake a planning function to ensure that the supply of school places is aligned with current and projected demand.
- 6.3 Although not part of the considerations for the Strathcona site given the proposed continuation of education provision on the site, any change of use from Education use and/or disposal requires the permission from the Secretary of State for Education under Section 77 of the School Standards and Framework Act 1998 and Schedule 1 of the Academies Act 2010.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 The Public Sector Equality Duty under section 149 of the Equality Act 2010 requires the Local Authority 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 covered under the Act are age, disability, gender reassignment, marriage and civil partnership (only in respect of eliminating unlawful discrimination) pregnancy and maternity, race (this includes ethnic or national origins, colour or nationality) religion or belief (this includes lack of belief) sex and sexual orientation. Due regard means giving relevant and proportionate consideration to the duty, in that whenever significant decisions are being made consideration must be given to the impact/affect that implementing a particular decision will have in relation to equality before making that decision. Brent Council also has a policy of considering Human Rights and socio-economic impact.

- 7.2 An Equality Analysis has been carried out on the proposals set out in this report and is provided as Appendix 2 to this report. It is not anticipated there will be any negative impact from these proposals on the basis of age, disability, gender reassignment, marriage and civil partnership (only in respect of eliminating unlawful discrimination) pregnancy and maternity, race (this includes ethnic or national origins, colour or nationality) religion or belief (this includes lack of belief) sex and sexual orientation.

8.0 Climate Change and Environmental Considerations

- 8.1 This proposal supports reducing the carbon footprint through enabling an increase in the number of children with SEND being educated within the borough, reducing the need for placements out-of-borough that require longer journeys.
- 8.2 Sustainable modes of travel will be encouraged for school staff and children who are not eligible for home to school transport, in particular the use of local tube and bus routes.
- 8.3 Some capital works will be required at the Strathcona site to ensure that the building is suitable for the SEND cohort. These will improve the environmental standards of the building.

9.0 Human Resources/Property Considerations

- 9.1 The Governing Board is confident that they will be able to recruit staff for the new site.
- 9.2 The additional school site expands a community special school and the council would continue to be the responsible body and employer from a Health and Safety and statutory compliance perspective of the expanded Phoenix Arch, as it is currently.

10.0 Communication Considerations

- 10.1 Formal consultation to change the provision is required under the statutory process for making significant changes (prescribed alterations) to maintained schools (Statutory Guidance for Proposers and Decision-makers, Department for Education, October 2024) and Opening and closing maintained schools (Statutory guidance for proposers and decision makers, Department for Education, October 2024). As Phoenix Arch Special School is a community school, the Local Authority has led this process.
- 10.2 The statutory notice was published in the Brent and Kilburn Times, on the Brent Council website and displayed on the school gate. Stakeholders were invited to submit written representations that set out their views and comments on the proposals.

10.3 Following the formal representation period, Cabinet is required to make a decision on this proposal within two months.

Related document(s) for reference

[Cabinet report June 2026: the Proposal to expand Phoenix Arch Special School on the Strathcona site](#)

[Cabinet Report November 2025: School Place Planning Strategy 2024 – 2028 2nd Refresh](#)

[Cabinet Report January 2026: Phase II Capital Investment Programme for School Place Sufficiency for Children and Young People with SEND](#)

Report sign off:

Nigel Chapman

Corporate Director, Children, Young People and
Community Development

Legal considerations provided by:
Ovril Tomlinson

Finance considerations provided by:
Folake Olufeko

Appendix 1:



Statutory Proposal - Expansion of Phoenix Arch School

Notice is given in accordance with section 15(1), 19(1) and 21(2) of the Education and Inspections Act 2006 (as amended by the Education Act 2011) that Brent Council intends to make an alteration to Phoenix Arch School (Department for Education number 3047005) of Drury Way, London, NW10 0NQ.

Phoenix Arch School is located in the Stonebridge ward and is a community special school which means it is maintained by Brent Council and the Council owns the buildings and the land. The school has a current roll of 55 pupils. All children who attend Phoenix Arch have a diagnosis of autism spectrum condition (ASC). Some children who attend Phoenix Arch also have learning disabilities (LD).

Notice is given that Brent Council is formally proposing the expansion of Phoenix Arch which will involve the creation of a 'satellite' school on the grounds of the currently unused Strathcona site which will accommodate around 50 additional pupils. This will expand the capacity of the school by about 91%.

School and Local Authority Details

The proposer is Brent Council, Civic Centre, Engineers Way, Wembley, HA9 0FJ. The school that is proposed to be expanded is Phoenix Arch School, Drury Way, London, NW10 0NQ, which is a mixed gender community special school for pupils aged between 4 and 11 years old.

Pupil numbers and admissions

At the point of the January 2026 school census, Phoenix Arch School was making provision for 55 day pupils between the ages of 4 and 11. This included 40 boys and 15 girls. Children are only admitted to the school where they have an Education, Health and Care Plan (EHCP) which names the school. The satellite site would offer around an additional 50 places for children with an EHCP. Due to the nature of providing suitable education for children with EHCPs, the actual number of additional places available may vary above or below 50 places.

Impact on the community

The Strathcona site was previously used for primary school provision for up to 210 pupils with parents and children using a range of means to travel to school. Most of the children attending the special school on the site would be provided with home-to-school SEND transport, which is usually a minibus that would reduce the number of individual vehicles during school pick-up/drop-off. SEND Transport minibuses would drive through the school gates and onto the site to turn around, rather than sitting on the road. Very few children are expected to travel to/from school by private car.

It is acknowledged that there would be staff travelling to the site and other professionals supporting the pupils at different points of the day. Currently there are 10-11 parking spaces on the Strathcona site, which is similar to the number of parking spaces at the main Phoenix Arch site that caters for 55 pupils. Nevertheless, Brent Council recognises the concerns raised by local residents regarding possible impacts of the provision on local traffic and parking.

Mitigating measures that are being considered include the possibility of increasing parking on-site for visiting professionals who are likely to travel by car to different school sites. As well as exploring possible arrangements for staff parking using other local offsite car parks, use of public transport will be encouraged as the most sustainable form of transport. The site is close to tube stations (South Kenton and Preston Park) and local bus routes, the use of which would be included in a sustainable travel plan.

Description of alteration and evidence of demand

The proposal is that Phoenix Arch would open an additional site on the Strathcona school site in September 2027. The address of the proposed site onto which Phoenix Arch will be expanded is Strathcona Road, Wembley, HA9 8QL. The new site would deliver the same specialist provision as the main site for around 50 children with ASC and LD. It is proposed the school on the Strathcona site will be called 'Phoenix Arch Strathcona'.

Brent has a current shortfall of around 210 places in primary special schools. To prevent children from not having a school place, the independent sector, home tuition, out-of-borough schools and the mainstream school sector are all currently being utilised. As well as not supporting children to be part of their local community and being less convenient for pupils who must travel longer distances to school, out-of-borough and independent schools are putting increasing strain on the high needs block and schools transport budgets. The development of the Phoenix Arch Strathcona expansion will provide new opportunities for children with an EHCP to attend a more local special school in Brent.

This proposal is part of an ongoing programme to deliver additional local school places for children and young people with Special Educational Needs and Disabilities (SEND) in Brent to meet increasing demand.

Objectives (including how the proposal would increase educational standards and parental choice)

Phoenix Arch is a very well regarded and popular local authority maintained special school., It has a strong leadership team and a supportive governing body. Phoenix Arch has considerable expertise in supporting children with ASC and LD. Because of this, Phoenix Arch is well-placed to support more children in need of specialist support.

Brent has a shortage of special school placements for children with ASC and LD. Because of this, some children are waiting too long for a special school place in Brent or are having to travel long distances out of borough to attend school, sometimes at considerable cost. It is felt that children should be able to access high quality specialist provision close to home. Expanding Phoenix Arch will enable more children to do this.

Expanding an existing special school can be done more quickly than creating a new special school. Creating a new special school may take many years, and further delay is unacceptable when children are waiting for a school place.

The Department for Education (DfE) has provided capital funding to enable local authorities to create more special school places. Therefore, the costs of the capital works needed to expand Phoenix Arch onto the Strathcona site will be covered by this grant funding.

Expanding Phoenix Arch will benefit the existing school as an additional site will necessitate the addition of further leadership capacity (to run the new site). As a larger school, Phoenix Arch may benefit from certain economies of scale e.g. purchasing resources.

The effect on other educational institutions within the area

There will be no effect on other educational institutions in the area. The expansion is proposed out of a need to address a shortfall of supply of local places for children who need to attend a special school.

Project costs and indication of how these will be met, including how long term value for money will be achieved

The estimated capital costs of creating a satellite site on the Strathcona site are £1m. As noted above, these costs are covered by a High Needs Capital grant that Brent Local Authority has received from the DfE. These proposed costs were approved by Brent Cabinet in January 2026.

The school's revenue budget will not be expected to contribute to any setting-up costs without additional funding being provided to the school.

Implementation plan

Subject to Decision Maker approval, any subsequent statutory approvals and completion of the required construction work on the Strathcona site, the alterations proposed would

be implemented from September 2027 which will be the proposed date the new school site will open and the formal date of expansion.

All applicable statutory requirements to consult in relation to these proposals have been complied with.

Copies of this proposal are available at haveyoursay.brent.gov.uk or can be obtained from: Michael Rollin, Service Manager, Access to Education, London Borough of Brent, Brent Civic Centre, Engineers Way, Wembley HA9 0FJ or Email: PhoenixArchConsultation@brent.gov.uk

Within four weeks from the date of publication of this proposal any person may let us know that they support the proposal, object to the proposal and / or make comments on the proposal, in writing, through the form on haveyoursay.brent.gov.uk where responses must be received by 11.59pm on 27th July 2026.

Postal responses can be sent to Michael Rollin, Service Manager, Access to Education, Children, Young People and Community Development, London Borough of Brent, 2nd Floor, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ.

The last date for representations is **27th July 2026**.

Signed: **Shirley Parks**
Director, Education, Partnerships and Strategy

Publication Date: **30th June 2026**

Appendix 2:

EQUALITY IMPACT ASSESSMENT (EIA)

POLICY/PROPOSAL:	Expansion of Phoenix Arch Special School by 50 places on Strathcona site
DEPARTMENT:	Children, Young People and Community Development
TEAM:	Inclusion Service
LEAD OFFICER:	Roxanna Glennon, Head of Inclusion
DATE:	1 June 2026

EIA Guidance is available online, please reach out to equality@brent.gov.uk for any further support.

SECTION A – SCREENING

1. Briefly and clearly describe the policy, proposal, change, or initiative, and what it is trying to achieve.

In January 2026, Brent Cabinet received a report setting out plans to provide more special school places to meet as a second phase of the Capital Investment Programme for School Place Sufficiency for Children and Young People with SEND, following successful delivery of 382 additional places. The report set out a business case for a programme of five special school expansion projects that would deliver 212 places, including use of the Strathcona site as a local special school satellite (50 place) subject to consultation in response to increasing unmet demand for local special school places.

The proposal is to expand Phoenix Arch Special School by 50 additional places for children and young people with SEND (primarily autistic spectrum condition) on the Strathcona site follows detailed discussions with the school leadership and Governing Board. The expansion of the school is a response to increasing demand for special school places across the borough for children who present with autistic spectrum condition (ASC), which is the school's designated cohort.

Brent currently has a shortfall of around 210 places in primary special schools. This proposal will go some way to addressing this need and will enable more Brent children to attend a local special school, avoiding either placement in the independent sector, out-of-borough special schools or the mainstream school sector. It will support children attending the school to feel part of their local community and will avoid the need longer travel distances to school.

2. Are there any groups who may be impacted by your proposal? For reference, Q4 lists all protected groups.

- Primary aged children with SEND (Phoenix Arch is a primary special school and therefore the provision will be for primary aged children only with SEND (autistic spectrum condition and associated learning difficulties).
- Parents and Carers of primary aged children with SEND

3. If no groups are affected, explain why.

n/a

4. Mark with an "X" the potential impact of the policy or proposal on different groups. You can mark more than one box for each group.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age - People of different age groups.	x		
Care Experience - People who have been in care for any period of their childhood.		x	
Disability - People with physical, sensory, learning, and mental health disabilities, long-term conditions, and non-visible disabilities.	x		
Gender reassignment - Transgender and non-binary people, including anyone who is proposing to, started, or who has completed a process to change their gender.		x	
Marriage and Civil Partnership - Applies mainly in the workplace, people who are married or in a civil partnership.		x	

Pregnancy and Maternity - People who are pregnant, on maternity leave, or new parents.		X	
Race and Ethnicity - People of different ethnicity, nationality, and skin colour.		x	
Religion or belief - People of all faiths, and those with no religious belief.		x	
Sex - Differences between men and women, including disparities in pay, career progression, and health outcomes.		x	
Sexual Orientation - People who identify as lesbian, gay, bisexual, queer, asexual, or any other non-heterosexual identity.		X	
Socio-Economic Status – People who are experiencing poverty or socio-economic disadvantage.		x	
Other relevant groups* <i>[replace this text and specify where appropriate]</i>		X	

* Other relevant groups could include Carers, Refugees or Asylum Seekers, Veterans, among others. Review the EIA Guidance for more information.

5. Complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Does the policy or proposal have implications for eliminating discrimination, advancing equality of opportunity, or fostering good relations among different groups?	x	
Does it relate to an area with known inequalities?	x	
Would it add, change, or remove services used by any groups listed in Q4?	x	

Does it have negative or positive equality impacts on any groups listed in Q4?	x	
If you have answered YES to ANY of the above, proceed to section B. If you have answered NO to ALL the above, proceed straight to section C.		

SECTION B – IMPACTS ANALYSIS

6. What data and evidence have you used to understand potential impacts? This could include service user data where relevant. If there is little or no evidence, explain why, and note any plans to improve data collection in future, adding this to the Action Plan in Section E.

As set out in the School Place Planning Strategy 2024-28 Refresh approved by Cabinet in November 2025 and the Phase 2 SEND Capital Programme paper agreed by Cabinet in January 2025, Brent has a shortfall of special school places. This relates to a continued increase in children and young people with SEND requiring an Education, Health and Care Plan (EHCPs). The number of children and young people with an EHCP was 3,892 as at March 2025 and 4,306 as at March 2026, an increase of 10.6%.

As a result of the shortfall of places, many primary aged children with ASC are having to travel to schools out of Brent (special schools in other boroughs or schools in the independent sector), which does not support children to be part of their local community. Some children who would attend the new provision are receiving home tuition or remaining in mainstream settings whereas their needs would be better met in special school provision. The expansion of Phoenix Arch by 50 places will support more of the Brent primary cohort of children with ASC to be in local special school provision.

Phoenix Arch is a good school and the expansion will ensure that more local children benefit from the quality of education that the school provides. The proposal has the support of the Phoenix Arch Governing Board.

7. For each characteristic:
- Provide detail for the impact listed in the response to Q4 in the left-hand box.
 - Provide data and evidence to explain how you reached your conclusion in the right-hand box.

Relevant data sources for Brent and its residents can be found in the EIA Guidance document.

Age	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
This provision will positively support primary aged children with SEND as outlined above. Children will be allocated a place according to their needs as identified in their EHCP in consultation with parents, as is usual process.	The proposal will provide an additional 50 local primary special school places.

Care Experience	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal has no impact on this group.	

Disability	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
This provision will positively support primary aged children with SEND as outlined above.	The proposal will provide an additional 50 local primary special school places.

Gender Reassignment	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal has no impact on the basis of gender.	

Marriage and Civil Partnership	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal impacts on children and therefore has no impact on the basis of marriage and civil partnership.	

Pregnancy and Maternity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal impacts on primary aged children with SEND and therefore has no impact on the basis of pregnancy and maternity.	

Race and Ethnicity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal impacts on primary aged children with SEND and therefore has no impact on the basis of race and ethnicity.	

Religion or Belief	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal impacts on primary aged children with SEND and has no impact on the basis of religion or belief.	

Sex	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal impacts on primary aged children with SEND and has no impact on the basis of sex.	

Sexual Orientation

Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal impacts on primary aged children with SEND and has no impact on the basis of sexual orientation.	

Socio-Economic Status	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal impacts on primary aged children with SEND and has no impact on the basis of socio-economic status.	

Other Relevant Groups	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
There are no other relevant groups impacted by this proposal.	

8. Summarise any engagement activities with relevant groups (this may replicate some of the information listed in Q7). State whether those involved represent the people affected by your proposal, or whether more engagement is needed, which should be added to the Action Plan in Section E.

The Phase 2 SEND Capital Programme was developed with input from local special schools and Brent Parent Carer Forum.

On the specific proposal, informal engagement with parents and carers of children currently attending Phoenix Arch Special School, governors of the school and residents who are local to the Strathcona site informed the proposal that was subject to formal consultation. The proposal has overall support. However, in both the informal and formal consultation, local residents raised concern about potential increases in traffic / parking issues related to the proposal. As the design and implementation plan are developed further, mitigating measures will be refined.

9. Provide more detail on any areas identified as requiring further data or detailed analysis.

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SECTION C – CONCLUSIONS

10. Summarise your overall conclusions based on the analysis:

- If there are no impacts, state that here, and **do not complete sections E or G.**
- If you decide not to move forward, explain why, and **do not complete sections E or G.**
- If there are negative impacts, explain what you'll do to reduce them. If you choose to continue despite negative impacts, or if negative impacts remain following your action plan, provide a justification for your decision.
- If there are positive impacts, explain how these could be strengthened, where possible.

There are positive impacts from this proposal for children and young people with SEND in providing further local special school places. The intention therefore is to proceed with the proposal, subject to Cabinet approval.

SECTION D - RESULT

Select one of the following options with an "X".		
A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE/ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN AND MONITORING

Unless your proposal has no equality impacts or you are not moving forward, complete the table below to track specific actions to:

- Reduce negative impacts and increase positive outcomes.
- Monitor actual or ongoing impacts.
- Record plans to improve data collection.

- Plan any further engagement or analysis that may be required.

Use the 'Status' column on the right to indicate whether the action is yet to start, is in progress, or has been completed.

Issue Identified	Action	Lead Officer	Completion Date	Status
Formal Statutory consultation (subject to Cabinet agreement)	Publish a statutory notice and undertake 4 weeks of statutory consultation	Roxanna Glennon	By end July 2026	Completed
Review feedback raised during formal consultation and report back to Cabinet	Inform the final proposal and implementation, subject to Cabinet agreement	Roxanna Glennon	By October 2026	Completed
Establish an implementation plan with Phoenix Arch leadership and Governing Board	To ensure smooth delivery and to mitigate any concerns	Roxanna Glennon / Phoenix Arch School	October 2026 onwards	To be progressed subject to Cabinet agreement to the proposal

11. Describe how you will monitor the actual, ongoing impact of the policy or proposal?

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SECTION F – SIGN OFF

	Signature	Date
Officer:	Roxanna Glennon	28 July 2026

Reviewing Officer or Head of Service	Shirley Parks	30 July 2026
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SECTION G – REVIEW

EIAs are live documents and should be reviewed regularly, especially if there are actions still to be completed or if the proposal has significant equality impacts.

When to review

- Review every 6 months until all actions in the Action Plan above are complete.
- If new data, feedback, or changes to the service arise, revisit the EIA to make sure it's still accurate.

Who should review

- The same officer who completed the EIA should carry out the review. If there's been a staffing change, the new lead officer should take over.

What to update

- Use the Status column in the Action Plan above to show progress (e.g. Not Started, In Progress, Completed). Add comments and updates in the table below — include any new data, evidence, or feedback.

When reviews can stop

- Once all actions are complete and no further equality impacts are expected, you can stop reviewing the EIA.
- Add rows to the table below as necessary until all actions are completed.

<u>Date of 1st Review:</u>	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	
<u>Date of 2nd Review:</u>	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	

<u>Date of 3rd Review:</u>	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	

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	Cabinet 7 September 2026
	Report from the Chief Executive
	Lead Member - Deputy Leader and Cabinet Member for Finance and Resources (Councillor Gwen Grahl)
Delivering Brent's 2024-2028 EDI Ambitions: Two Years On	

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
List of Appendices:	Two Appendix A: Y2 EDI Strategy Updates by Commitment Appendix B: Anti-Racism Action Plan Updates
Background Papers:	2024-2028 EDI Strategy, Anti-Racism Action Plan
Contact Officer(s): (Name, Title, Contact Details)	Sarah Milner-Barry, EDI Strategy Lead 020 8937 2891 sarah.milner-barry@brent.gov.uk Grace Hall, Policy and Performance Manager 020 8937 1471 grace.hall@brent.gov.uk Angela Chaudhry, Senior HR Business Partner – EDI angela.chaudhry@brent.gov.uk

1.0 Executive Summary

- 1.1 As we reach the halfway point of our 2024-2028 Equity, Diversity and Inclusion (EDI) Strategy, we have continued to make progress towards creating a more inclusive, fair and connected borough. During Year 2, we have strengthened accessibility and inclusion across council services, expanded opportunities that help tackle inequalities, and continued to embed anti-racist and inclusive

practices within our workforce and culture. From improving access to interpretation, translation and digital inclusion support, to increasing community participation, investing in employment pathways, and strengthening our use of EDI data and insight, we are turning our commitments into meaningful action. This report sets out the progress made in delivering the EDI Strategy, Anti-Racism Action Plan and EDI Board priorities during Year 2, highlights the impact of this work, and identifies where further effort is needed. While challenges remain and there is much more to do, we remain committed to tackling inequities, supporting residents and employees to reach their full potential, and ensuring no one is left behind.

- 1.2 This report also helps to fulfil the council's obligation under the Public Sector Equality Duty to publish annual information demonstrating how we are complying with the equality duty.

2.0 Recommendation(s)

Cabinet is asked to:

- 2.1. Endorse the progress made in Year 2 of the EDI Strategy 2024-2028, Anti-Racism Action Plan, and EDI Board priorities.
- 2.2 Agree that information in this report be turned into public-facing communications materials highlighting Year 2 achievements.

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 As we reach the halfway point of Brent's four-year Equity, Diversity and Inclusion Strategy, this report highlights the progress made during Year 2 towards creating a borough where everyone feels valued, included, and able to thrive.
- 3.1.2 Over the past year, we have continued to strengthen accessibility and inclusion across our services. This has included improving access to interpretation and translation services, expanding participation in consultation and engagement activity, supporting community-led projects through the Love Where You Live Celebrating Diversity Fund, and creating more inclusive spaces through initiatives including the Dementia Friendly Venues Charter. We have also continued to reduce barriers to support through programmes tackling digital exclusion and community-based services that help residents access advice, wellbeing, and practical support closer to home.
- 3.1.3 The report also highlights progress in creating opportunities and tackling inequalities across the borough. During Year 2, we continued to expand supported internships, apprenticeships, and employment pathways, helping more residents access skills, training, and employment opportunities. Alongside this, we have continued to strengthen our understanding of inequalities through improved data, community engagement and partnership

working, helping ensure that services are better informed by the experiences and needs of Brent's diverse communities. We have also taken steps to invest in our workforce, recognising that an inclusive and representative organisation is essential to delivering the best outcomes for residents.

3.1.4 While there is still more to do to address the inequalities experienced by some of our residents and communities, the progress set out in this report demonstrates Brent's continued commitment to turning our EDI ambitions into meaningful action. As we move into Year 3, we will continue working with residents, partners, and staff to build a fairer borough where everyone can thrive.

3.1.5 This report contributes to each of the Borough Plan's priorities, recognising that equity, diversity, and inclusion cuts across all five key priorities, and is central to everything we do as an organisation. The council's 2024-2028 EDI Strategy helps to ensure that we achieve the ambitions of the Borough Plan by delivering high-quality, effective, and inclusive services to residents, having a workforce that reflects our diverse population, and ensuring that residents and employees can achieve their potential and make a positive contribution to Brent.

3.2 Background

Context

3.2.1 The Corporate EDI Board was set up in March 2024 to provide leadership and oversight for the council's EDI work. It meets every three months and is chaired by the Chief Executive. The Board oversees delivery of the EDI Strategy, the Anti-Racism Action Plan and the Black Community Action Plan (BCAP), as well as its own annual priorities.

3.2.2 The sections below describe the progress made and the activities underway to deliver our EDI ambitions in both the Board and Strategy's second year, with a focus on impact. These sections are supplemented by appendices which provide detail on the various activities underway as part of each commitment:

- Appendix A – EDI Strategy updates
- Appendix B – Anti-Racism Action Plan updates

EDI Strategy Updates:

3.2.3 The council's [2024-2028 EDI Strategy](#) was adopted in April 2024 and lays out how we will foster a borough in which all residents feel valued and have equitable access to opportunities. The strategy has an overarching focus on promoting inclusivity, through three objectives:

- Inclusion: Accessibility and Cohesion
- Narrowing the Gap: Tackling Inequalities

- Establishing an Inclusive Workforce

Objective 1 – Inclusion: Accessibility and Cohesion

3.2.4 This objective aims to ensure that all council services are accessible and responsive to the diverse needs of Brent's communities. Examples of key progress include:

- **Improving inclusive communications and accessibility:** The council launched updated Inclusive Language and Equality Monitoring Guidance, introducing a standardised approach to equality data collection and expanding coverage to include care experience and socio-economic status. These tools are helping to improve consistency, inclusivity and confidence across services when engaging with residents and collecting equalities information.
- **Increasing access to services:** Demand for accessibility and language support services remained high, with more than 1,260 SignVideo calls and almost 15,000 interpretation and translation requests during the year. This demonstrates the continuing importance of accessible communications to enable residents to access council services.
- **Strengthening resident voice and participation:** Registered users of the Have Your Say platform more than doubled from 3,849 to 8,639, with participation increasing by over 500%. The introduction of translation functionality and targeted engagement activity has helped broaden participation and improve access for a wider range of residents.
- **Supporting community cohesion and belonging:** The new Love Where You Live Celebrating Diversity Fund allocated £30,000 to 12 community-led projects designed to bring communities together, tackle isolation and celebrate Brent's diversity.
- **Improving the accessibility of council spaces and services:** The Community Wellbeing Service at New Horizons is now operating at scale, with Housing Options supporting around 100 families per week and Sufrā supporting more than 500 members. In addition, 19 council venues have now achieved Dementia Friendly Venue accreditation, helping create more accessible and inclusive environments for residents.

3.2.5 Whilst progress is encouraging, challenges remain. Consistent adoption of the updated Equality Monitoring Guidance across services is still developing, some communities including Gypsy, Roma, and Travelers remain underrepresented in consultation activity, and further work is required to strengthen evaluation of long-term outcomes arising from engagement activity.

Objective 2 – Narrowing the Gap: Tackling Inequalities

3.2.6 This objective focuses on identifying and addressing the disparities experienced by different groups. Key initiatives toward this objective include:

- **Strengthening inclusive decision making:** The council refreshed its Equality Impact Assessment framework, introducing stronger requirements around the use of data, lived experience and intersectional analysis, alongside six-month reviews for significant impacts and a central repository to support organisational learning.
- **Addressing educational inequalities and disproportionality:** The Brent Schools Race Equality Programme continues to expand, with participating schools strengthening anti-racist practice, improving the use of data and embedding more inclusive approaches. Early evidence shows exclusions among Black boys reduced from 201 in 2023/24 to 100 in 2024/25, while exclusions among children and young people with SEND fell by 27.7%.
- **Supporting vulnerable residents through Safe Spaces:** Brent now operates 15 Safe Spaces across the borough, with plans to expand into libraries to improve accessibility, awareness and support for residents experiencing domestic abuse and violence against women and girls.
- **Reducing digital exclusion:** The council has continued to improve digital access through targeted support and infrastructure investment, including the distribution of almost 1,000 digital devices and expansion of full-fibre connectivity across council sites, while delivering targeted digital skills programmes for residents most at risk of exclusion.
- **Using evidence to tackle health inequalities:** Public Health has strengthened its understanding of local inequalities through new needs assessments, neighbourhood-level insight and targeted engagement, reaching more than 4,000 residents through public health activity and supporting more targeted service design and prioritisation.

3.2.7 Despite positive progress, many inequalities remain rooted in wider socio-economic factors and require sustained partnership working and preventative approaches to achieve long-term change.

Objective 3 – Establishing an Inclusive Workforce

3.2.8 To reflect the diversity of the community we serve, the council has continued to strengthen its approach to workforce inclusion, learning and organisational culture. Key achievements include:

- **Embedding anti-racism and inclusive leadership:** More than 700 employees have completed Anti-Racism and Inclusive Practices training, with feedback showing over 90% reporting increased understanding of privilege, bias and inclusion and a stronger commitment to inclusive practice.
- **Strengthening workforce data and accountability:** Directorates now have access to bespoke EDI dashboards and employee lifecycle analysis

covering recruitment, progression, retention, representation and pay, enabling more targeted action planning and accountability.

- **Expansion of inclusive employment pathways:** The council continues to expand opportunities for young people and underrepresented groups through supported internships, apprenticeships and work experience programmes. There are currently 19 Brent residents participating in the Supported Internship Programme, with placements delivered across council services and external partners. Work is also underway through the Brent Inclusion Strategy and Employment & Skills Strategy to strengthen pathways into employment, improve employer engagement and develop new vocational opportunities for young people with SEND. The Inclusion Service is working to strengthen tracking of longer-term outcomes for young people with Education, Health and Care Plans, including progression into supported internships, apprenticeships, employment, and further education.
- **Strengthening employee voice and influence:** Staff Networks and Equity Champions have become increasingly embedded within governance structures, supporting organisational learning, surfacing lived experience and contributing directly to initiatives such as Anti-Racism training and Directorate action planning.
- **Improving organisational capability:** EDI expectations continue to be embedded within learning, leadership development and management pathways, helping to build confidence and capability to lead inclusively across the organisation.

3.2.9 However, workforce inequalities remain, particularly in relation to progression into senior roles. Continuing to improve data quality, disclosure rates and consistent implementation of inclusive leadership practices remains a priority.

Anti-Racism Action Plan Updates:

3.2.10 The council's [Anti-Racism Action Plan](#) is a component and delivery strand of the EDI Strategy, spanning the same duration. The action plan set a new level of ambition for Brent: becoming an Anti-Racist organisation.

3.2.11 Progress against the Anti-Racism Action Plan has continued throughout Year 2, with increasing integration into mainstream organisational processes rather than delivery through stand-alone activities. Notable achievements include:

- **Strengthened governance and accountability:** Anti-racism is increasingly embedded within mainstream governance arrangements, with the EDI Board providing strategic oversight and Directorates now using workforce dashboards to monitor representation, progression, recruitment and pay-related disparities.
- **Building organisational capability:** More than 700 employees have completed Anti-Racism and Inclusive Practices training, supported by

Equity Champions and Staff Network representatives who helped design and deliver the programme, creating greater organisational understanding of racism, privilege and inclusion.

- **Using data to identify and address structural inequalities:** Workforce analysis continues to inform targeted action in areas including recruitment outcomes, senior representation, progression and pay gaps, helping move the organisation towards a more evidence-led approach to tackling inequality.
- **Embedding anti-racism within systems and processes:** Anti-racism considerations continue to be incorporated into workforce policies, performance discussions, learning and development activity and organisational guidance, helping shift anti-racism from a standalone initiative to a core organisational responsibility.

3.2.12 While progress is evident, addressing structural inequalities remains a long-term endeavour which will require sustained leadership focus, continued challenge and evidence-led action

EDI Board Year 2 Priorities Updates:

3.2.13 In its second year, the EDI Board focused on three main priorities to help drive forward the EDI Strategy and Anti-Racism Action Plan. These priorities were chosen because of their focus on long-term cultural and organisational change. Below is a summary of what each priority involved and the progress we've made.

Establishing a Strategic Approach to Community Engagement

3.2.14 A report was presented to the EDI Board in December 2025 exploring how the council engages with Brent's diverse communities and how organisational learning from engagement activity can be strengthened. The report highlighted examples of effective engagement taking place across the organisation, including place-based approaches, community-led activity and increased participation through digital engagement platforms. It also recognised the value of sustained, trust-based engagement with seldom-heard communities, building on learning from successful initiatives delivered across services.

3.2.15 The Board identified opportunities to improve consistency in engagement practice, reduce duplication, and strengthen how insight and learning are shared across the organisation. A key theme was the need to move beyond one-off consultation exercises and create a more strategic approach that supports co-production, long-term relationship building and greater community influence on decision-making. As a next step, work is underway to develop a more coordinated corporate approach to community engagement, helping services apply consistent principles, strengthen engagement with seldom-heard communities and better demonstrate the impact of resident feedback on service design and policy development.

Embedding EDI within Artificial Intelligence and Automation

- 3.2.16 A report was presented to the EDI Board in September 2025 examining the opportunities and risks associated with the increasing use of Artificial Intelligence (AI) and automation across local government. The report considered how the council can ensure that innovation and efficiency are balanced with fairness, transparency and accountability, particularly where automated tools may influence decision-making or resident outcomes.
- 3.2.17 The Board discussed a number of key themes, including the risk of algorithmic bias, governance and accountability arrangements, maintaining resident trust and confidence, and the opportunities AI presents to improve accessibility and inclusion when implemented appropriately. The discussion established a number of principles to help inform the council's future approach to responsible AI adoption and governance. Moving forward, these principles will help shape the development of relevant policies, governance arrangements and future implementation plans as the council's use of AI and automation continues to evolve.

Supporting Brent's LGBTQ+ Community

- 3.2.18 A report was presented to the EDI Board in June 2026 focusing on this priority area, which was selected in recognition of LGBTQ+ communities as a relatively seldom-heard group, hindering inclusive service planning, alongside evidence from the LGBTQ+ staff network documenting homophobic incidents within the council. The report explored available evidence, current engagement activity and opportunities to strengthen support, visibility and inclusion.
- 3.2.19 Key themes emerging from the discussion included improving representation of LGBTQ+ voices within engagement and consultation activity, strengthening organisational understanding of LGBTQ+ experiences and inequalities, increasing support for LGBTQ+ employees through staff networks and leadership, and improving the use of data and insight to inform future policy and service development. The Board agreed that supporting LGBTQ+ communities should not be viewed as a standalone activity but as part of the council's wider ambition to create an organisation and borough where all residents and employees feel safe, valued and able to thrive. Future work will focus on strengthening engagement, improving understanding of community needs and identifying areas where services and policies can better support LGBTQ+ residents and employees.

Next steps

- 3.2.20 Cabinet is asked to endorse progress made toward commitments within the EDI Strategy 2024-2028, Anti-Racism Action Plan, and Year 2 EDI Board priorities.
- 3.2.21 The EDI Board will continue to drive progress on each of the council's EDI commitments, and present Cabinet with another annual update in 2027.

4.0 Stakeholder and ward member consultation and engagement

- 4.1 As this is an update report, no stakeholders or ward member consultations or engagements took place.

5.0 Financial Considerations

- 5.1 There are no financial implications of this update report.

6.0 Legal Considerations

- 6.1 As a local authority we are under a general duty of best value to “make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness”. The EDI strategy and supporting documents are one way in which the council can demonstrate that it is achieving this requirement and reviewing progress ensures we are continuously assessing and improving on the delivery of our functions.

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 Having due regard involves the need to enquire into whether and how a proposed decision disproportionately affects people with a protected characteristic and the need to consider taking steps to meet the needs of persons who share a protected characteristic that are different from the needs of persons who do not share it. This includes removing or minimising disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic.
- 7.3 The EDI Board's Year 2 progress update demonstrates continued progress in delivering the council's EDI Strategy 2024-2028 and Anti-Racism Action Plan. During Year 2, significant work has been undertaken to improve accessibility, strengthen community engagement, enhance the council's approach to identifying and addressing inequalities, and develop a more inclusive workforce culture. Particular progress has been achieved through the refresh of Equality Impact Assessments, expansion of anti-racism learning and development, strengthened workforce data analysis, investment in digital inclusion, and improvements to inclusive communications and equality monitoring practices. While challenges remain around tackling structural inequalities, particularly in relation to workforce progression and representation at senior levels, the

council is increasingly using evidence, engagement and accountability mechanisms to drive continuous improvement.

- 7.4 The EDI Board will continue to drive forward the council's EDI agenda, with a focus on accountability, improving data quality and usage, and consistent community engagement.

8.0 Climate Change and Environmental Considerations

- 8.1 There are no climate change or environmental considerations.

9.0 Human Resources/Property Considerations (if appropriate)

- 9.1 There are no Human Resources/Property Considerations

10.0 Communication Considerations

- 10.1 Communications materials highlighting key achievements from the EDI Strategy and Anti-Racism Action Plan's second year are being developed and will be promoted along with related messaging to staff via internal channels. External communications will be developed based on feedback from Cabinet and communications colleagues.

Report sign off:

Kim Wright

Chief Executive

Legal considerations provided by:
Biancia Robinson

Finance considerations provided by:
Kitu Thevarajah

Appendix A – EDI Strategy Progress Updates by Commitment

Objective 1 – Inclusion: Accessibility and Cohesion

Commitment	Progress Update
Refresh Communication Strategy to ensure accessibility	As we look to the end of the current Interpreting and Language Services contract in 2026, we are exploring ways to improve the reliability and quality of the service - especially for British Sign Language interpreting. We are exploring piloting new tools that leverage the latest technology, which could allow us to improve inclusion and accessibility while also saving money. We continue to improve our written communications, to make sure that everything we publish is in plain English and easily understood. Part of this involves educating, supporting and guiding the services we work with. We promoted the new Inclusive Language Guide internally. We continue to make sure the imagery we use across our corporate channels is inclusive. From the magazine to flyers, banners and social media posts, we are always conscious of getting the right gender balance and ensuring people pictured reflect the communities we serve when it comes to ethnicity, religion, disability and LGBT+.
Review internal approach and use of inclusive and accessible language	The updated Inclusive Language guide and Equality Monitoring Guidance were launched in September 2025, as part of National Inclusion Week. Both documents are available on the intranet for all staff to access, and were promoted as part of the week's activities. The updated Inclusive Language guide includes new dedicated sections on care experience, socio-economic status, neurodiversity, dementia, and immigration. It also makes clearer the distinction between ethnicity and race, and provides a definition of those terms. The gender identity section was expanded, with additional guidance around pronouns. The Equality Monitoring guidance was updated to include care experience and socio-economic status, and includes a 'Question Bank' of standardised equalities questions to ask across different protected characteristics. Work is ongoing to ensure services are following the updated guidance around collecting equalities information, and updating relevant systems where necessary. Both the inclusive language guide and equality monitoring guidance are promoted during the Anti-Racism and Inclusive Practices training.
Raise awareness of accessibility services (e.g., SignVideo, translation)	For 2024-25 the number of calls recorded to SignVideo was 1,260 amounting to 200+ hours. SignVideo is an accessibility service provided for residents calling the contact centre who require assistance with British sign language. This service is advertised on the Brent website. Feedback suggests that an on-demand BSL video

	interpreting service would be useful for services outside of the Contact Centre - something we intend to explore as part of the new language services contract. Over the past year (Oct 2024-Oct 2025), officers used the telephone interpreting service 14,910 times (80% of DALs bookings), booked video interpreting 1,547 times (8%), booked face-to-face interpreting 1,958 times (11%), and translated 166 documents (1%). We hosted a workshop with officers from a variety of teams who use DALs in mid-November to listen to their experience of using today's service and their asks of the future service as the current contract comes to an end. They told us that the reliability of BSL interpreting could be improved (181 BSL bookings via DALs in the last year) - we know that there is a supply/demand issue with BSL interpreters, an issue which isn't unique to Brent, but there may be opportunities to improve this through a new contract. Despite making up just 1% of bookings, translation of documents accounted for 14% of spend with DALs. Video accounted for 23% of spend, and face-to-face 21%. We believe there could be opportunities to significantly reduce the spend on document translation by using existing in-house tools, now that large language models are more sophisticated and can interpret context. The most booked languages over the past year were: Arabic (6,059), Farsi (1,444), Portuguese (1,092), Somali (993), Polish (931), Gujarati (898), Tamil (672), Romanian (567). As part of the contract review, we will cross-reference this usage with Brent's Census data."
Increase awareness of, and establish new forums to better understand residents and communities	We continue to promote our front facing resident forums: Brent Connects, Pensioners Forum, Brent Multi-faith, Disability Forum. The team continue to increase awareness of all front-facing forums through various engagement methods. All the forums are resident, and member led, meaning agenda topics are tailored to each forums concerns and needs. The annual attendance across all of our forums 1,982. Pensioners, disability, multifaith forums (1153) and Brent Connects forums (829). Using the same Engagement and Promotion efforts have increased awareness and participation across our forums. The Disability Forum has attracted new attendees, while the Pensioners Forum has seen renewed interest in membership. Brent Connects continues to experience a steady rise in attendance compared to previous rounds, supported by a robust digital engagement strategy - including targeted social media promotion and positive 'word of mouth' from participants. The multi-Faith Forum continues to reach out to denominations not yet represented, though overall membership has remained relatively stable in recent months. Consultations (Brent's Have Your Say portal)

Since October 2023 registered users to Brent Have Your Say consultation portal have doubled - from 3,849 to 8,639 in June 25, a 124% increase.

Beyond registration growth, resident participation defined as users or visitors actively engaging in consultations (posting, commenting, or responding to surveys) has risen dramatically. Participation increased from 1,301 (January 2020–October 2023) to 8,109 in November 2025, representing a fivefold increase (523%) and signalling a strong upward trend in civic involvement.

A new translation feature was also added to the portal this year – Consultations on the platform can now be translated into Brent’s top 10 languages, making it easier for more residents to take part. Languages are: Gujarati, Polish, Arabic, Portuguese, Tamil, Somali, Romanian, Urdu, Persian/Farsi and Nepalese

This significant growth reflects the combined impact of:

- Targeted internal and external promotion of the Have Your Say platform
- Strategic mobilisation of the Community Engagement team’s expertise; and
- The increasing number of council officers trained and supported to use the platform effectively.

Together, these efforts have strengthened Brent’s culture of diverse participation and reinforced the Council’s commitment to meaningful resident engagement.

Other Community Engagement activities include:

Community Cohesion Day

Brent Council, in partnership with the Jason Roberts Foundation and funded by MHCLG, hosted Community Cohesion Day at The Pavilion, Stonebridge, in May and June 2025. Over 1,000 residents attended two vibrant days of cultural showcases, live performances, and free activities, celebrating unity and inclusion across Brent.

Radical Place Leadership in Harlesden

This programme is redesigning the neighbourhood model through co-design and co-production, ensuring Harlesden’s diverse communities shape local decisions. The Community Engagement Team builds trust, facilitates dialogue, and amplifies voices to make the process inclusive.

Roma Community & East African Cultural Event

We’re engaging the Roma community as part of the GRT draft strategy and working with Irish Traveller and Eastern European groups to strengthen relationships. On 29 November, Brent will host an East African Cultural Event featuring traditional dances, cuisine, and the coffee ceremony, celebrating Somali, Ethiopian, and Eritrean cultures.

Adapt services to provide flexible options (e.g., Brent Hubs, Libraries)	The Community Wellbeing Service at New Horizons has continued to embed and strengthen its integrated delivery model, demonstrating clear impact across multiple service areas. The centre is now operating effectively at scale, with Housing Options supporting an average of 100 families per week. In addition, Sufra NW London currently supports over 500 members through the community shop and café, alongside a range of wraparound services including employment support, welfare advice, and wellbeing sessions. This integrated model has improved accessibility for residents with diverse and complex needs by providing multiple services within a single, trusted location. Co-location has reduced barriers to access, particularly for residents who may experience financial hardship, language barriers, digital exclusion, disability, or other vulnerabilities. In line with our EDI commitments, services continue to be adapted to provide flexible and responsive options for residents. Through Brent Hubs and partner delivery, residents are able to access support via walk-in appointments, pre-booked sessions, community outreach, and targeted wellbeing activities. This flexibility ensures that services are responsive to differing needs, cultural contexts, and personal circumstances, enabling greater inclusion and earlier intervention. Building on Year 1 of the New Horizons Centre, Year 2 will focus on strengthening partnership working, improving coordination between services, and ensuring that support is person-centred. The success of the centre demonstrates the value of integrated, community-based provision in reducing inequality and improving outcomes for residents across the borough. Brent Libraries achieved Bronze status as Dementia Friendly venues, and are continuing to improve staff awareness. Staff training sessions are continuing in Spring 2026, alongside learning from Brent L&D team. We have worked closely with Public health team to deliver these sessions. Brent Home Libraries and Outreach Services continue to support a wide range of community based settings, including nurseries, community organisations, and readers who cannot make it into our libraries. Currently sending books and resources in to 66 organisations. We have 93 home library readers and not only provide books now, but also include puzzles, which are proving popular. From April 2025 to the end of Jan 2026 we have sent out a total of 27,551 books to organisations, and 5,728 to Home readers. Book Start packs are distributed across Libraries, nurseries (including the ones attached to schools), health centres and various outreach events. From April 2025 - Dec 2025 we have distributed 9,756 packs to Brent children and young people, and their families.
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	The Outreach team also currently co-ordinate volunteering & work experience placements across the libraries. From April 2025 - Dec 25 we have placed 136 volunteers/work experience students. In 2025/26 Brent Libraries have been leading the delivery of phase 2 of Dress to Remember. Dress to Remember is a creative programme bringing Brent residents together to celebrate memory, identity and diverse cultural heritage. Developed by Brent Public Health, Libraries, Culture and Heritage with Tuareg Productions Ltd, the project centres people living with dementia while encouraging intergenerational involvement. Participants from two community centres (Elders Voice and the Bhakti Dharma Centre) take part in workshops, guided walks, museum visits, photography and storytelling, pairing older residents with younger participants to share memories, clothing traditions and lived experiences. Supporting residents, carers and families, the programme helps people reconnect with one another and community life. In February we hosted 'Dress to Remember: An intergenerational discussion on dementia' at the Civic Centre. This forum featured interactive discussions, video screenings, and a monologue by Marsha Millar (Top Boy). It was designed for families and carers, young people, community leaders and councillors, dementia care organisations, Brent residents, and the wider community. Students from Nottingham Trent University London are supporting the project by collecting oral histories and capturing activities through film and photography to promote empathy and inclusive practice.
Assess council refurbishments and review accessibility of buildings	We have successfully accredited 19 sites under the Dementia Friendly Venues Charter. These include 6 Libraries, 2 Sports Centres, 2 Day Centres, 8 Family Wellbeing Centres, and Brent Civic Centre. 1 of the 19 venues (Vale Farm Sports Centre) achieved a Gold rating. Accrediting 19 venues is a positive step towards making Brent more dementia-friendly and inclusive. Residents living with dementia, along with their families and carers, can feel more confident accessing everyday spaces, with improved staff awareness and more accessible environments. These changes also benefit a wider group of residents, creating services that are more welcoming for all. Building on Year 2, the corporate EDI team will continue working with venue managers to support accreditation and ongoing improvement. This includes providing practical guidance, identifying low-scoring areas and recommending targeted actions, and embedding accessibility into planned works. As part of the Property Strategy approved in 2024 we are progressing with tenant surveys to establish accessibility status and identify improvements required. To date the responses from tenants have been poor but the team are

	chasing. The survey outcome will enable the Council to establish how well the Commercial portfolio is meeting accessibility standards and what can be done to improve accessibility. If tenant information is not forthcoming the commercial property team will carry out site inspections. This will be undertaken through 2026, with an estimated completion date of April 2027, after which the team will assess how best accessibility improvements can be made. The Drum Wembley is a fully accessible venue. Facilities include or can arrange the following: • Blue badge parking onsite. • Wide doorways and access routes. • Clear signage. • Changing facilities and accessible toilets with support bars. • Flexible seating options for people with varying needs, such as those who require seating with additional support. • Hearing loop systems. • Availability of sign language interpreters or live subtitling during events or presentations. • Multiple lifts to accommodate specific mobility needs. • Accessible emergency exits and routes. • Staff trained to assist people with disabilities in case of an emergency evacuation. The Events team are equipped with the knowledge and skills necessary to accommodate accessibility requirements for all events. This covers a wide range of topics, including understanding various disabilities, the legal requirements for accessibility, and the specific needs of attendees with physical, sensory, and cognitive impairments. The team is also trained to implement inclusive event practices, such as providing accessible seating, ensuring clear signage, arranging for interpreters or captioning services, and offering dietary accommodations.
Establish a new approach to EDI events, supporting community-led celebrations	As part of the new 'Enabler Approach', Brent launched the Love Where You Live (LWYL) Celebrating Diversity Fund in 2025. The fund was established to support the delivery of a programme of community cohesion and inclusion events across Brent, while strengthening collaboration with local stakeholders and enabling them to play a more active role in bringing communities together. The overarching aim of the grant was to support communities to organise events that foster community cohesion, tackle isolation, promote inclusion, and celebrate diversity in Brent. A total of £30,000 was made available through the fund. Registered organisations and Brent residents were eligible to apply for grants of up to £1,000, while collaborative bids from two or more registered organisations could apply for up to £5,000. By the closing date, a total of 58 LWYL applications had been received, comprising 30

	applications from organisations and 28 from residents. 12 applications were approved for funding and the full £30,000.00 was allocated to these projects. 7 are organisations and 5 are residents. The 2025 events programme under the refreshed approach, which includes Holocaust Memorial Day, Disabled People's Empowerment Month, Islamophobia Awareness Month, and Black History Month delivered strong overall performance, with high levels of satisfaction and positive resident impact. Key strengths included high-quality content, engaging speakers, inclusive environments, and very high willingness to attend future events. Feedback shows events are particularly valued as spaces for learning, community connection, and sharing lived experiences. Areas for improvement included earlier and clearer communications, event pacing, and clarity of messaging. The most consistent challenge was audience reach, including footfall and diversity of attendance.
Embed an engagement programme in schools giving young people a comprehensive overview of Brent's history and heritage through Libraries, Arts and Heritage	Becoming Brent was completed in October 2025. Key Developments: <u>History of Black History Month (BHM 2025):</u> A session with young people took place during BHM 2025 and featured Rosemary Laryea in conversation with Professor Kehindi Andrews, academic, author and activist. This event took place as planned, and feedback was very well received. <u>Becoming Brent Schools Project (March–June 2025):</u> This project was intended to support Brent's commitment to being an anti-racist borough by encouraging students to engage critically with Britain's colonial history, including Wembley's role in the British Empire Exhibition. Unfortunately, this did not take place due to a lack of appetite from schools to participate. <u>Autism-Friendly Mornings at The Library at Willesden Green:</u> These sessions offer a quiet, supportive environment for children aged 3–15 and their families to explore books, museum collections, and the Becoming Brent exhibition. This has been successful and is now going to be trialled at Wembley Library. <u>Public Talks and Cultural Events:</u> A series of high-profile events took place, including In Conversation with George the Poet and a documentary screening exploring Brent's Black Music History featuring Big Zeeks and a panel of experts. These events were open to all but were designed to appeal to young people. The formal evaluation report indicated a very high level of satisfaction with the public programme.

	<u>Postcards in Perspective: Brent Now and Then:</u> This interactive workshop used archival postcards from the British Empire Exhibition to explore decolonisation and changing perspectives of Brent. These sessions were open to all but deliberately designed to attract younger audiences. This was very successful, and two sessions were delivered. Although strong foundations have been established, several areas require ongoing attention: 1) Broader School Participation: Encouraging increased school engagement with Becoming Brent initiatives remains a challenge. Tailored support for teachers and enhanced outreach strategies may support higher involvement. 2) Resource Development: The development of accessible, curriculum-aligned educational resources—particularly digital content—remains an area for growth. This has proven difficult due to lack of appetite from schools. However, our regular schools engagement programme across Libraries and Heritage continues.
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Objective 2 - Narrowing the Gap: Addressing Inequalities

Commitment	Progress Update
Refresh EIA approach	The refreshed EIA template and guidance, which integrates both care experience and socio-economic status following internal recognition of those protected characteristics, was launched in November 2025. The updated template contains a two-column structure for impact, requiring both data and narrative detail. It also requires six monthly reviews for any EIAs which have significant or negative impacts. An accompanying SharePoint repository for EIA submission and for reviewing existing EIAs to learn from good practice, is also being launched as part of the refresh, which will support with delivering cumulative analysis of EIAs.
Address attainment gaps for vulnerable groups in partnership with Brent schools.	The Brent Race Equality Programme, launched in December 2024, continues to scale, with 10 universal training sessions delivered and 12 additional courses introduced, alongside increased staff participation. Engagement remains strong, with 39 schools registered for the Anti-Racist Schools Award, 23 schools participating in Every Future Foundation programmes, and 5 infant and nursery schools engaging in targeted workshops. Six secondary schools are using the Flair data platform to inform targeted action, with most participating schools implementing anti-racist policies and receiving coaching support. Schools are increasingly using data systematically, including logging and analysing racist incidents, reviewing behaviour and exclusions through race and SEND lenses, and incorporating staff and pupil voice to better understand belonging and lived experience.

	Work to reduce exclusions and disproportionality includes staff training, pupil workshops and restorative approaches, alongside curriculum review support accessed by two-thirds of enhanced schools. Effective approaches include in-school coaching, data-informed practice and structured frameworks such as the Anti-Racist Schools Award. Early evidence shows more consistent responses to racist incidents, reduced repetition in some schools, and increased confidence among pupils and staff in reporting concerns, indicating improved trust and psychological safety. Schools are also better able to identify disparities, including over-representation of Black pupils and pupils with SEND in behaviour data, enabling more targeted leadership action. While it is too early to evidence attainment and exclusion outcomes, impact is strongest in culture, leadership capability and systems, providing a strong foundation for longer-term reductions in disproportionality.
Continue to develop 'safe spaces' across the Borough and online. Page 163	Brent currently operate 15 Safe Spaces. The Community Safety Team have commenced plans to establish a safe space at Willesden Green library. This is our flagship library in Brent, and we also have the CYP/Early Help teams based here so this is an ideal location. Our Domestic Abuse Service provider Advance have confirmed that they will provide the training sessions for the staff at the library. We are in the process of liaising with the library manager to agree dates for the training sessions. Once this safe space is established, we will work towards expanding this to Wembley library. The take up of the safe space project at the LDO In Wembley has been lower than expected. We are currently waiting for Solace to provide us with the take up data for quarter 4 so that we can assess whether there has been an increase since the last quarter. We will consider how we can promote the project in collaboration with Solace. The expansion of the safe space project at Willesden Green library will allow us to engage with residents from other parts of the borough and to increase awareness of the services that are available in Brent.
Address disproportionality in fixed and permanent exclusions in schools	We continue to focus on disproportionality and inclusive practise in partnerships with schools in Brent and regularly review school level data with headteachers. The data team has upgraded our YTD Exclusions dashboard following feedback to assist with this and a disproportionality dashboard is currently in under development to become live shortly. This will allow active tracking of exclusion disproportionality across a range of metrics and by school allocation of the ISOs. One focus area was exclusions (PEX and suspensions) for boys from black ethnic groups. This fell from 201 exclusions in 2023-2024 to 100 in 2024-2025. For the academic year to date (2025-2026) there 101 exclusions

	for this group. Exclusions for CYPs with SEND fell by 939 exclusions (27.7%) from 2023-2024 to 2024-2025. For this academic year there are 463 exclusions for CYPs with SEND for YTD, which is tracking lower than last academic year. No looked after children were permanently excluded in 2024-2025 or to date for 2025-2026. We have a renewed focus on socio-economic disadvantage, where rates of exclusions for CYPs identified as Pupil Premium (PP) or in receipt of Free School Meals (FSM) appear to be disproportionate. This continues and the new disproportionality dashboard will assist with monitoring and developing workstreams for this metric.
Provide targeted cultural and literacy programmes to combat disadvantage. Page 164	Brent Libraries and Archives continue to deliver a broad range of targeted cultural and literacy programmes aimed at reducing disadvantage and improving access to learning. Work is underway to make Brent Archives content publicly accessible via the Preservica digital platform in 2026. A diverse programme of activity has been delivered across the year, including termly school sessions combining reading, arts and culture (e.g. Royal Philharmonic Orchestra workshops, author visits and storytelling), alongside borough-wide initiatives such as the Spine Festival (in partnership with 16 library services) and the Summer Fun Festival, which engaged 2,524 children with 1,233 completing the programme. Targeted programmes include Telling Tales (68 participants), Booktrust storytime programmes (over 1,100 participants), and Empathy Day and Refugee Week activities, reaching children and families across the borough. Targeted inclusion work has been strengthened through programmes such as robotics workshops (531 participants across 5 libraries), supporting STEM learning for children from disadvantaged backgrounds and those with English as an additional language. The Dress to Remember dementia programme (240 participants) has expanded inclusive outreach, successfully engaging residents who are less likely to access library services, while Public Health partnership community days have further extended reach and improved engagement with underserved communities. Early evidence indicates strong participation and positive outcomes across programmes, particularly in supporting literacy, confidence and wellbeing for children, families and older residents. The most effective approaches combine targeted outreach, partnership delivery and inclusive programme design. Key challenges remain around sustaining and scaling provision, including extending reach to more communities and securing ongoing capacity and funding to build on current impact.
Improve our understanding of	Two new needs assessments highlighting health inequalities have been published (one on Sexual and reproductive health, one on Air quality). The sexual health report led to collaboration with London Sexual Health

where and why health inequalities exist, in partnership with the NHS, and tailor our services appropriately.	service on research to target sexual health advice. With the NHS, we continue to monitor system KPIs and have introduced monitoring of KPIs for the 5 programmes, each with at least one inequalities KPI focus. Our analysis of health and care needs in emerging communities (Somali and Romanian) was presented at national conference, showcasing Brent's commitment to understanding inequalities using data. In the last 12 months (to Sept 2025), BHM held over 100 public health events with over 4000 attendees. 48% were from Asian ethnic groups and 25% from Black ethnic groups; 25% from most deprived fifth of areas; 20% in factories and 17% via buses going to community locations. Other events include the dental event programme held at schools and libraries across the borough. Over 3000 children have been examined by dental professionals in the past 5 years. In 2025 Syrian children were recorded for the first time, with 40 Syrian children examined and found to have high caries prevalence (85% vs an average of 34% overall at Brent dental events). This may be the result of Syrian families fleeing the country amid a severe hunger crisis in an ongoing and complex conflict. Malnutrition results in a lack of essential nutrients which can weaken teeth and gums, making them more susceptible to caries, decay, and infections.
Enhance digital inclusion by identifying exclusion areas and improving connectivity, skills, and device access.	The council has continued to strengthen digital inclusion through a combination of infrastructure, access and skills-based interventions. Full fibre broadband has now been expanded to 24 council-owned sites, alongside small cell installations improving 5G connectivity across public spaces. A Mobile Coverage Checker has also been introduced to improve resident access to reliable connectivity. Targeted support continues for residents at risk of digital exclusion. In 2024/25, 572 devices were distributed (including laptops, tablets and mobile devices) through the Resident Support Fund and partner referrals, ensuring support is focused on those most in need. Targeted skills programmes include digital confidence workshops for the 50+ cohort and Build and Code sessions for young people (ages 8–11), supporting both inclusion and future skills development. This work is supported by the 2026–28 Digital Roadmap, which prioritises inclusive digital access, accessible services and the ethical use of AI. Early evidence shows improved access and engagement; however, digital exclusion remains a significant challenge. Around 18–20% of adults in Brent are estimated to be digitally excluded, with risk concentrated among older residents, low-income households and disabled people. A continued focus on targeted intervention and infrastructure will be critical to reducing this gap.
Continue to co-design services with communities,	We have engaged with residents with lived experience of homelessness as part of our work to develop a refreshed Homelessness & Rough Sleeping Strategy. Over the coming months, we plan to engage more with residents with lived experience of homelessness to shape up the work we're doing on preventing homelessness,

building on models like Community Hubs and Family Wellbeing Centres.	as part of the Embrace Change portfolio. Engagement with residents with lived experience of homelessness, notably through Crisis' group, has helped to shape the support offer that the Integrated Neighbourhood Team puts into practice on the ground. This has also given strong insights into how our existing services are currently working, and how we can improve (this has helped in providing feedback that is shaping the Preventing Homelessness programme). Through engagement with residents, community leaders and VCSE organisations, we have learned a lot about community priorities and barriers. Learning from these conversations has emphasised the need for greater visibility of and join up between council and statutory services and the development of a One council approach. It has also emphasised the latent capacity within communities themselves to play a bigger role, and helped us to understand how the Council can act as an enabler for this (through provision of spaces, streamlined approaches to neighbourhood funding and supporting community leadership etc.). These learnings are shaping a number of test and learns as part of the Working In Neighbourhoods Programme (formerly Radical Place Leadership). We are testing new approaches to Community-led and community-powered initiatives (e.g. Roundwood Park Nature Connection Centre, Avenue Road Improvement Plan etc.) and identifying ways that we can amplify resident voice and influence systems change (e.g. in our approach to Council-owned spaces and collaboration with VCSE). A diverse cross-sector steering group has been set up to strengthen collaboration and empower the VCSE sector to lead change. Its first joint project (Shaping the future of Brent's VCSE) brought together local VCSE organisations, the Council and partners to better understand the sector's needs and aspirations and explore how we can work together to build a stronger, more inclusive civil society. The outcomes of the event will directly inform a new support offer for the sector. The group is also planning a Social Value Summit to shape Brent's approach to social value and co-create a Social Value Charter for local organisations.
Adapt Brent Hubs' support to assist residents facing the cost-of-living crisis.	Brent Hubs, in partnership with Sufra NW London, continue to develop and adapt their support and advice offer as part of the Community Wellbeing Service at the New Horizons Centre. The service is now operating five days a week, successfully delivering integrated support alongside Sufra's hot meals, wellbeing sessions, and discounted shop for members. Take-up across all services has been positive, demonstrating the value of co-located, wraparound provision for residents with diverse needs. Sufra continues to build membership and engagement, while Housing Options is supporting an average of 100 families per week. Adult Social Care services, which have been operating 3–4 days per week, are also moving towards full five-day provision. Together, these services are providing flexible, accessible support and advice across the borough, improving outcomes and reducing barriers for residents,

Establish an EDI monitoring dashboard to collect and share insights that improve services.	The EDI monitoring dashboard continues to operate and we continue to make adaptations to improve its impact and accessibility. We have also built bespoke and service-specific EDI dashboards to support service level monitoring and delivery, this includes HR, Brent Starts, CYP and New Horizons
Provide specialised employability support through Brent Works and commissioned services to boost social mobility, especially for those facing labour market disadvantages.	Via The UKSPF Programme Brent Works continue to support residents who need to additional support to improve their life and opportunities to work. In addition, through the mental health forum they work with partner organisations to provide advice and guidance and help residents to secure employment. In 2025 Brent Works placed 52 residents apprentices and 108 residents in to apprenticeships Brent Start offers digital skills at both at Stonebridge and at the Brent Digital Skills Hub and delivers digital skills suitable for all levels from basic to advanced. In this academic year, Brent Start has supported 396 people through its digital skills courses. Out of the 396, 306 are unemployed and approximately 210 are on benefits. Employment and job stability: A number of learners advanced in their careers, with 0.5% being promoted in their current jobs, 3.6% securing new full-time jobs, and 6.3% finding new part-time jobs. These figures reflect the effectiveness of our programs in enhancing employability and career progression. Additionally, 15.7% of respondents have remained in the same job, indicating job stability and satisfaction among a significant portion of our learners. 1.0% of learners set up their own businesses, demonstrating the practical application of skills acquired during their studies. 3.6% of respondents started volunteering, showcasing their dedication to community service and personal growth. This involvement not only benefits the community but also enriches the learners' own experiences and skills. Further Education: A substantial 22.8% of learners pursued further education, with 1.0% starting full-time courses, 3.7% enrolling in part-time courses at other colleges, and an impressive 18.1% returning for another part-time course at Brent Start. This commitment to continuous learning and skill development is a testament to the value our learners place on education The EDI Data Dashboard is used at Brent Start to identify and address a range of potential barriers affecting learner access, engagement, retention, and outcomes. At the moment the database is still at its early stages of use at Brent start but analysis of the dashboard has highlighted the need for more courses to be delivered in the Queens park and Kingsbury wards in Brent as engagement in these areas are well below the other wards.

Objective 3 – Establishing an Inclusive Workforce

Commitment	Progress Update
Strengthen corporate learning to embed EDI within the organisation.	Anti Racism training workshops have been delivered across the organisation at all levels and to date over 700 staff and managers have completed. This training is ongoing with scheduled sessions weekly. Facilitating these sessions are EDI and L&D colleagues, Equity Champions and Staff Network members who underwent a comprehensive train the trainer programme and helped to shape the module and delivery. Feedback has been consistently positive, with average ratings above 4.4 out of 5 across all questions. Participants report increased confidence in understanding key concepts, recognising racist behaviours, and applying anti-racist approaches in their roles. Many also indicate a stronger personal commitment to contributing to a more anti-racist organisation, suggesting an early shift in awareness and intent. In terms of inclusive leadership, early indications from feedback suggest that managers have a greater understanding and able to reflect on their responsibilities in setting inclusive team cultures and challenging inappropriate behaviours. The new management induction programme, which includes this training, is still being rolled out, and we will evaluate its impact on leadership practice once it is fully operational. There is a comprehensive programme of EDI activities available via the learning hub which are available for staff to complete Face to face and online modules in last rolling year include: Introduction to EDI: 262 staff attended Inclusive Leadership: 66 staff attended Management Induction 94 staff attended HR Modules (Workplace Resolution, Disciplinary and Grievance, Performance Management, Attendance (Sickness) Management) -144 managers attended We are also in the process of redesigning the management pathway. Management Induction has launched and we are reviewing the HR management modules which will form the foundation. We are currently piloting a new management development programme with Shared services comprising 12 modules and are aiming for this to be rolled out across the organisation in the Autumn. EDI will inform all the modules and is one of the key principles in design.
Establish a data informed journey of the employee	There is continual work on departmental data distribution with plans for the development of resulting action plans in early 2026. In addition, with the annual reports published, additional work to address the findings of the reports is in progress, such as the development of a working group to bring more young people into the council, and

lifecycle identifying trends across protected characteristics.	further deep dives into recruitment data affecting specific ethnic groups. Corporate work to raise the profile of equality impact assessment has been in train with plans to create a greater network of support for managers completing the assessment.
Establish and embed the internal Brent Council Anti-Racism Action Plan.	Actions arising out of the updated pay gap report will be progressed. We will continue to provide a mutual mentoring programme for our BAME staff and use L&D to support the progression of staff in the Council. In addition, we are signing up to a LGBTQ+ standard to ensure there is accountability for representation and support of these groups in the Council. We will also continue to provide additional assistance to our disabled staff through our Accessibility Specialist in the Council.
Ensure all staff have EDI performance objectives tailored to their roles.	The integration of EDI into formal performance objectives has evolved in line with changes to our performance management approach. As we move towards more regular one-to-one conversations, EDI is no longer set as a standalone objective. Instead, it is being embedded within our organisational values and behaviours, particularly through our focus on inclusive leadership. EDI expectations are reinforced through training and development activity, ensuring managers have the awareness and capability to identify and address inclusive practice issues in real time. This approach supports more continuous and responsive conversations, enabling it to be reflected more meaningfully in day-to-day management practice. There is continued work on raising the profile of the importance of sharing personal data in the Council through, not only communications channels such as the intranet and Viva, but also through the in-person training for all staff and the staff induction events to ensure seldomly heard from employees are informed. In addition, Equity Champions are encouraged to speak to their Directorates about this. Further work will be done to monitor the impact of these campaigns during the year.
Provide work experience within the council for young SEND residents.	Brent continues to advertise all its schemes, including work experience and apprenticeships inclusively, making applicants aware of the Disability Confident Guaranteed Interview Scheme and providing appropriate support where indicated. A work experience proposal which addresses a range of initiatives, including work experience, internships, student study placements, voluntary working and apprenticeships is due to go to PCG with a date to be confirmed. Brent continues to receive applications through the Disability Confident Guaranteed Interview Scheme. While we do not receive direct feedback from candidates, the scheme helps make the recruitment process more accessible

by giving people the opportunity to show their skills and experience in an interview, rather than relying only on a written application. We also offer a range of reasonable adjustments, such as extra time or rest breaks, sharing questions in advance, and providing questions in accessible formats whether printed, displayed on screen, or shared during Teams or in person interviews.

19 Brent residents (plus 3 participants from neighbouring boroughs) are taking part in the 2026 Supported Internship programme.

The largest concentration of placements is at Brent Civic Centre/Wembley Park with 9 participants (including 6 Brent residents).

Additional placement locations include:

- Harrow Retail – 3 interns
- Northwick Park – 3 interns
- Goldman Sachs – 2 interns
- Charing Cross Hospital – 1 intern
- Hammersmith and Fulham – 1 intern
- Mencap – 1 intern
- Royal Free Hospital – 1 intern
- Pavilion – 1 intern

The range of placements shows a strong cross-sector partnership providing meaningful work experience for young people.

Challenges: There are ongoing challenges in securing both internal and external placements due to the high level of support required from employers.

While outcomes are positive, the council recognises that tracking progression into employment, further education and other positive destinations remains a challenge due to the number of providers involved in delivery. Work is underway through the Inclusion Service to strengthen outcome monitoring for young people with Education, Health and Care Plans (EHCPs), supporting a more robust understanding of the effectiveness of different pathways and interventions.

Brent Start continues to support preparation for adulthood through its Supported Learning Programme, which provides tailored learning opportunities focused on employability, independence, digital skills and communication. During 2025/26 the programme supported five young people with SEND and is exploring the development of an NCIL-funded café to create further supported work experience opportunities.

	Next Steps: Planned next steps include expanding departmental participation, increasing manager understanding of inclusive employment practices, strengthening progression routes into apprenticeships and paid roles, and improving long-term outcomes tracking. Feedback continues to be highly positive, with young people developing confidence, communication skills, and independence, and managers recognising the valuable contribution SEND participants bring. The programme remains a key driver of the Council's inclusive employment and social value priorities. In addition, work is progressing through both the Brent Inclusion Strategy 2026-2029 and the emerging Employment and Skills Strategy to broaden employment pathways for young people with SEND. This includes increasing employer engagement, promoting supported internships through procurement and S106 arrangements, strengthening relationships with Disability Confident employers, exploring external funding opportunities, and developing the Welsh Harp Environmental Education Centre, which is expected to provide land-based vocational skills and employment opportunities for young people with SEND from 2027.
Support care leavers with work experience and apprenticeships within the Council	There is ongoing collaboration with the Care Leaver Team to arrange meetings with care leavers, determine what they are looking for in terms of interests and opportunities, and provide signposting where possible. No data is collated due to most young people not wanting to be labelled. One of the barriers we face as an employer is getting young people into apprenticeships or employment due to the salary on offer not matching their benefits income. More one to one support to identify roles of interest to the individuals has been offered via the LAC teams with some take up on roles not necessarily within the council. In addition enhanced one-to-one support has been provided alongside Employment & Skills in collaboration with LAC teams to help individuals identify roles of interest. As a result, some young people have proactively engaged in discussions about career pathways, including opportunities outside the council.
Reduce the ethnicity, disability and gender pay gaps.	The council continues to strengthen its understanding of workforce inequalities through detailed analysis of recruitment data and the introduction of an Inclusive Recruitment Guide to support fair and equitable hiring. This includes targeted work to identify barriers, particularly for disabled staff, alongside ongoing analysis of disparities, such as the fact that 80% of new joiners starting above the base spinal column point were men, and 20% were women. For other groups, it is hoped that the departmental action plans will go some way to address the Council-wide figures - for example, the lower levels of representation at more senior levels. This will be supported by the development of L&D's management pathways and learning offer

	Key challenges identified include delays and inconsistency in accessing reasonable adjustments and assistive technology, reliance on individuals repeatedly explaining their needs, variable manager confidence in supporting disabled staff, and uneven engagement across directorates. In response, a number of actions are being implemented, including the introduction of a Disability and Workplace Adjustment Passport to improve consistency and reduce duplication, Accessibility Drop-In sessions to provide personalised support, strengthened processes for accessing equipment and adjustments, and bespoke disability awareness training. There is also a continued focus on increasing engagement and accountability across Corporate Directors and Directorate Management Teams. Early indicators suggest positive progress, including increased engagement with accessibility support, more consistent and structured adjustment conversations, improved manager signposting, and enhanced data capture on disability-related needs. This work will be further supported by the development of management pathways, increased visibility of EDI data through Equity Champions, and the inclusion of care experience and socio-economic status as additional factors in addressing pay gaps.
Empower staff networks to foster open dialogue and support new groups as needed.	The networks have continued to provide engaging and awareness raising events, including for notable periods. Since the launch of the Early Careers Network, we have had various successful events such as an event for 'Jumping Into Management' and 'New Year Navigation: Map Your Goals'. In addition, the network participated in a competition for the Young Local Authority of the Year. The LGBTQ+ Network with the Race Equity Network have recently held an event to mark LGBTQ+ History Month and Race Equality Week. Interest was also recently generated during a joint in-person event hosted by the Staff Multi-faith Forum and the Community based Multi-Faith Forum when they held 'Faith Literacy' training, all to name a few. We have also continued to promote the Equity Champions - most recently through the Anti-Racism and Inclusive Practices training where employees are encouraged to speak to the ECs about EDI related issues and also where we have had some interest from employees to become ECs. Also, on an on-going basis the work of ECs is promoted through the Employee Induction process. Staff networks are represented at EDI Board meetings, providing a route to raise issues and influence organisational culture and decision-making. Overall membership has remained stable with steady growth, following a recent data refresh and cleansing exercise across networks.

	The Diverse Ability Network led an Autistica survey highlighting areas for improvements for neurodiverse colleagues, many of which were reviewed and are in the process of being adopted corporately. This also contributed to introducing neurodiversity as a category in the staff survey and played a strong role in the creation of an Accessibility Officer role. The LGBTQ+ Network survey identified areas for improvement, and helped to highlight the need for LGBTQ+ inclusion to become a year 2 priority area for the EDI Board. The Council has also commissioned Pride UK to support further development in this area.
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Appendix B – Anti-Racism Action Plan Updates

Commitment	Progress Update
PCG are visible and lead by example in relation to anti-racism, ensuring the organisation meets the expectations around anti-racism as defined in this action plan. Ideas and initiatives around anti-racism are visibility driven at the top of the organisation, to help permeate action and drive at all layers of the organisation. Existing networks and initiatives, such as staff networks and Cultural Diversity Champions, are supported by their Sponsor and their needs and ideas are represented at PCG.	Strategic Leadership
	The Staff Networks are becoming more established and strengthening their connections with PCG/Senior Management sponsors. With all Networks having co-chairs in place. Chris Whyte – Gender Equity Network Nigel Chapman – Diverse Ability Network Kibibi Octave – REN (including Black Staff Forum, Asian Staff Group and the Muti Faith Group) Minesh Patel – LGBTQ+ Network Marsha Henry – Early Careers Network Following on from bespoke EDI Reports provided to all areas of the Council last year, all Directors have now access to an EDI Dashboard, which enables them to review and monitor EDI data for their own Directorate. This data also includes information on the equal pay gaps (gender, ethnicity and disability) and enables comparisons against other Directorates and the Council overall. This data can be refreshed much more frequently, enabling more accurate data to action. To assist in the creation and action of an action plan for each area, meetings with Directors and DMTs are being set up, alongside Equity Champions where data is being reviewed, alongside input from the Equity Champions to see how the work can be progressed and monitored over time and communicated to employees, to be as impactful as possible. In addition, HR Business Partners will also be brought in to understand the data to assist in the input in this process.
Building on existing evidence and examples, Brent demonstrates and is seen as an	We are continuing our work on tackling race inequality and work closely with our Race Equity Network and the Black Staff Forum on awareness and educational events. The pulse staff survey in 2025 did highlight that 64 % of staff positively felt that the Council takes tackling racial inequality seriously, which was lower than would have been hoped and one percentage point lower than the last pulse survey in 2023. Since September 2025, mandatory Anti Racism and Inclusion training has been rolled out to all employees to gain a greater

organisation that understands racial inequality and seeks to be proactive in tackling injustice. This includes signing up to the Unison Anti-Racism Charter and the London Local Government Anti-Racism Statement.	understanding of anti racism, bias and privilege and ways to stand up and tackle this. We continue to run events corporately such as Race Equity Week, to highlight how we can tackle injustice when we see it. Events included Active Bystander training and an intersectional joint Network event run by the Race Equity Network and LGBTQ+ Network which highlighted the layers of discrimination that people may face. Work on EDI data has also been reviewed to understand the trends and patterns of the progress of Black, Asian and Multi ethnic staff entering the organisation compared to their white counterparts.
Employee Lifecycle	
Bias reduced as far as possible within the recruitment process. More progression of Black, Asian and Minority Ethnic talent into senior roles. Better support for colleagues seeking to progress within the organisation, seeking to replicate the model and offer for our national graduate trainees.	We continue to be data driven, looking at where potential bias may exist. Following on from the review of recruitment data, initial work is being done to explore ways of conducting a pay audit, with particular focus on ethnicity (ethnicity pay gap). The reverse mentoring scheme is also due to be opened up for Black Asian and Multi Ethnic staff and the next cohort is due to start in the summer of 2026.
Continue to maintain an organisation that is reflective of the Brent population.	The Annual Workforce Equality Report and pay Gap Reports have been published for 2026 and show the progress made in terms of actions and representation. For example, again, 71% of our workforce are from Black Asian and Multi Ethnic (BAME) backgrounds. However, there has again been an increase in the proportion of BAME staff at the top (5%) levels of the Council - this year this stands at 47% (from 42%). There has been no change in the proportions of individual ethnicities

Seek, as best as possible, to ensure the organisation is reflective of the Brent population at all levels of seniority.	which make up the BAME grouping in the Council, which are as follows, continued work needs to take place to explore possibilities of reducing the pay gaps: Black groups - 36% (population: 17%) Asian groups - 27% (population: 33%) Mixed/ Other ethnic groups - 8% (population: 14%) There has also been no change in the proportions of BAME groups in the grade bandings and so BAME groups continue to make up 42% of HAY graded posts. This year, there has also not been a change in the proportions of BAME staff whose pay has progressed - 70%. We are continuing to carry out work which takes deeper dives into the recruitment data at key stages of the recruitment process for specific ethnic groups at HAY grades to more closely reflect the communities we serve.
Improving the organisational knowledge and understanding of language and experience and white privilege through: • open conversations in collaboration with networks and groups • Sessions run by external/specialist organisations	Since the launch of the mandatory Anti-Racism and Inclusive Practices in-person training in Sept 2025, we have had over 700 staff attend. The topic of language features heavily in activities and discussions where the promotion of our corporate Language Guide features also. The topics of power, privilege cultural competency and communication are also topics of discussion, with over 90% of attendees agreeing that they can recognise privilege and how it shapes perspectives and interactions. In addition, 91% of attendees feel more committed to being more inclusive in the workplace.
Training and Development	
The organisation has a robust EDI and anti-racism learning and development offer that is well attended, encourages curiosity	Anti Racism training workshops have been delivered across the organisation at all levels and to date over 600 staff have completed. This training is ongoing with scheduled sessions weekly. In addition, training for all c.100 members of Senior Managers' Group (Heads of Service and upwards) was provided, with 66 of these having attended. Facilitating these sessions are EDI and L&D colleagues, Equity Champions and Staff Network members who underwent a comprehensive train the trainer programme and helped to shape the module and delivery

and enables people to understand how to embed EDI and anti-racism within their work.	There is a comprehensive programme of EDI activities available via the learning hub which are available for staff to complete. Face to face and online modules in the last rolling year include: Introduction to EDI: 262 staff attended Unconscious bias: 427 staff attended Neurodiversity: 176 staff attended Management Induction: 94 staff attended (of which EDI is a part) We are also in the process of redesigning the management pathway. Management Induction has launched and we are reviewing the HR management modules which will form the foundation. We are currently piloting a new management development programme with Shared services comprising 12 modules and are aiming for this to be rolled out across the organisation in the Autumn. EDI will inform all the modules and is one of the key principles in design.
The organisation has robust anti-racism training, as part of the broader EDI learning and development offer.	Since the launch of the mandatory Anti-Racism and Inclusive Practices in-person training in Sept 2025, we have had over 600 staff attend. The topic of bias and microaggressions features heavily in activities and discussions. Feedback to date has been very positive and attendees have indicated a high level of learning through the exercises and discussions within the session, with close to 92% of attendees being satisfied with the training session. In addition, 86% of attendees felt confident in applying the ways they can be more anti-racist in the workplace and 91% felt more committed to being more inclusive in the workplace, as a result. The programme is due to continue until all staff have attended.
Policies and Processes	
Anti-racism is embedded within our processes and procedures, where necessary.	Our policies and processes are regularly reviewed to ensure they align with and support our commitments and working practices. The Workplace Resolution Policy and Disciplinary Process provide clear, fair routes for employees to raise concerns or grievances, helping issues to be addressed consistently, appropriately, and at the earliest opportunity
The organisation establishes guidance around terminology when referring to Black, Asian and	Following extensive consultation, the term Black, Asian and Multi-Ethnic has been adopted. Consultation has included engagement through Staff Values sessions, including an all-staff survey, senior management discussions, Staff Networks and PCG input. These engagement exercises provided clear opportunities for the workforce to share their views and contribute to the selection of the terminology. We are mindful that language evolves over time, and that views on terminology may change. We are open to reviewing this in approximately 24

multi ethnic communities in the workplace	months' time as part of ongoing learning and development. Communication around the new terminology, to be used across the Council, is currently underway and will be reflected in updated guidance.
Strategies and Action Plans	
The organisation adopts the Anti-Racism Action Plan and it is embedded within the broader ambitions around EDI. The action plan is monitored, reviewed and delivered.	We continue to monitor progress against our EDI dashboard, through the EDI Board
Staff Networks	
Staff networks continue to operate autonomously acting as a support network, educator and critical friend. Staff networks continue to feel supported and enabled to grow and flourish.	Staff Networks continue to educate and raise awareness through informative and engaging events, several of which are intersectional: The REN and LGBTQ+ Networks are collaborating on a joint event during Race Equity Week. Five Network Chairs have volunteered in the creation, adoption, and delivery of mandatory anti-racism and inclusion training, demonstrating strong commitment and disseminating the Council's anti-racist stance. Networks actively participate in the EDI Board, helping the Council understand workforce needs. Both the Diverse Ability Network and the LGBTQ+ Network have conducted surveys to highlight member needs, with follow-up surveys planned to benchmark progress. In conjunction with the LGBTQ+ Network, the Council is progressing with the PRIDE UK Standard and framework to strengthen LGBTQ+ inclusion. The Gender Equity Network is launching a survey on women's health. The Early Careers Network held a vision boarding event to help employees prioritise key goals. The Multi-Faith Group is running a Faith Literacy session on inclusion and supporting colleagues of diverse faiths Overall, the Networks and Groups remain proactive and enthusiastic, driving initiatives that make the Council a more inclusive and supportive workplace.
Cultural Diversity Champions continue to feel supported	Equity Champions play a vital role in embedding EDI across the Council, supporting both strategic decision-making and practical initiatives: 16 Equity Champions were recruited as part of a successful campaign and are becoming embedded within their respective Directorates, with some continual movement in numbers of ECs as time progresses.

and enabled to grow and flourish. Cultural Diversity Champions provide effective support and advice to staff, teams and services. Cultural Diversity Champions feedback themes, experiences and challenges experienced by staff. Cultural Diversity Champions consistently report on cases.	All Champions invited to DMTs to discuss insights from the EDI equality dashboard and support monitoring and evaluation of resulting actions. Six Equity Champions have volunteered to both design and deliver the Council's mandatory anti-racism training, demonstrating strong commitment and directly contributing to a more inclusive workplace. In addition, four Champions have volunteered to become Equality Impact Assessment Link Officers, who support colleagues across the council to complete EIAs. A new form is being devised to help to log issues in a more streamlined and effective way for annual reporting of feedback and cases.
Community Engagement	
The organisation proactively engages with and builds relationships, across services, a range of community representatives and groups in the interest of tackling racial inequality in Brent.	During Year 2, a paper was presented to the EDI Board setting out the team's approach to EDI. The paper outlined how our EDI approach incorporates anti-racism principles and responds to the needs of Brent's diverse communities, drawing on learning from existing engagement activity. The EDI Board was asked to consider and endorse the following proposals: • Community Engagement Framework Endorse the development and implementation of a Council-wide Community Engagement Framework aligned with Brent's EDI commitments. This framework will establish a consistent and strategic approach to engagement across all services, with ongoing review to ensure continued relevance and impact. • Community Insight Infrastructure Endorse strengthening the Council's community insight infrastructure, including shared data, reporting mechanisms and organisational learning, to ensure engagement intelligence systematically informs policy development, service design and decision-making. • Resident-led Forums Endorse the continued role and use of resident-led forums – including the Pensioners Forum, Disability Forum, Multi-Faith Forum and Brent Connects – to strengthen participation, representation and community influence. This includes consideration of a greater role for the VCSE sector in convening and coordinating these forums.

- Internal Community Engagement Network

Endorse strengthening the internal Community Engagement Network, ensuring representation from key services and directorates to improve coordination, share best practice and support consistent, inclusive engagement across the Council.

- Targeted Engagement Pathways

Comment on the opportunity to develop targeted engagement pathways for communities, informed by data and insight, with the potential for named service leads, clear milestones and measurable outcomes to strengthen inclusive engagement.

- Next Generation Engagement

Note the potential to establish a 'Next Gen Engagement' initiative, focused on embedding children and young people's voices at the heart of engagement activity, and amplifying youth perspectives in the Council's engagement approach.

- Future Engagement Models

Note that discussions are underway to explore alternative approaches to the Brent Connects model, with a view to identifying options that best support inclusive engagement. Further detail on potential approaches will be developed and shared with the Board post-election for comment.

Alongside this strategic work, we continue to embed inclusive engagement practice across Council departments. This includes supporting services to apply EDI and anti-racist principles in day-to-day engagement, building internal capability through shared standards, guidance and learning, and strengthening cross-departmental collaboration via the Community Engagement Network. This ensures inclusive engagement is integrated into service planning, delivery and decision-making across the organisation.

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	Cabinet 7 September 2026
	Report from the Corporate Director, Finance and Resources
	Lead Cabinet Member – Deputy Leader & Cabinet Member for Finance & Resources (Councillor Gwen Grahl)
Treasury Management Outturn 2025-26	

Wards Affected:	All
Key or Non-Key Decision:	Key Decision
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:	Four: Appendix 1: Economic Commentary Appendix 2: Debt and Investments Portfolio Appendix 3: Average Rate vs Credit Risk Appendix 4: Prudential Indicators
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Karima Mbarak, Senior Finance Analyst Capital, Treasury & Commercial Email: Karima.mbarak@brent.gov.uk Tel: 020 8937 1192 Oliver Simms Head of Finance (Capital, Treasury and Commercial) Capital, Treasury & Commercial Email: Oliver.Simms@brent.gov.uk Tel: 020 8937 1679

1.0 Executive Summary

- 1.1** This report presents the outturn for the Council's Treasury Management activities for 2025/26. The Council undertakes its treasury management activities in accordance with the CIPFA Treasury Management in the Public Services: Code of Practice, as required under the Local Government Act 2003 and associated Regulations. Regular reporting to the relevant Committee forms

part of this framework and supports transparency, accountability and prudent financial management.

1.2 This report updates Members on both the borrowing and investment decisions made by the Corporate Director, Finance and Resources under delegated authority and considers the Council's Treasury Management performance. The Council can only borrow for capital investment, it cannot borrow to fund operational, day to day expenditure. The borrowing supports the Council's capital investment programmes for both Council Housing (HRA) and General Fund.

1.3 Key emerging points are as follows:

- The Council has complied with its Prudential Indicators for 2025/26.
- Borrowing at 31 March 2026 was £1,074.0m an increase of £174.0m compared to 31 March 2025.
- Cash Investments at 31 March 2026 was £43.8m, a decrease of £3.5m compared to £47.3m at 31 March 2025.
- The Council's Capital Financing Requirement (CFR), representing the underlying need to borrow, increased by £58.5m to £1,412.3m.
- The average rate for the Council's total borrowing was 3.9% as at 31 March 2026, an increase from 3.85% at 31 March 2025, caused by high interest rates.
- The Council's rate of return on cash investments decreased during the year from 4.53% (31 March 2025) to 3.81% (31 March 2026).
- Minimum Revenue Provision (MRP) charge (excluding PFI/Leases) to the General Fund for 2025/26 was £16.5m.

2.0 Recommendation(s)

That Cabinet:

2.1 Note and comment on the overall financial performance for 2025/26.

2.2 Note that the Council has complied with the prudential indicators set by Council in February 2025.

2.3 Approve the submission of the report to Full Council for approval in accordance with the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice.

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 Effective treasury management is a key component of the Council's overall financial strategy. Through regular reporting, Members are able to scrutinise borrowing and investment decisions and ensure that they continue to support the Council's priorities while maintaining a prudent approach to risk and affordability. The Council has once again operated within its approved prudential indicators and in accordance with the CIPFA Treasury Management Code.
- 3.1.2 During 2025/26, the Council continued to borrow to support the delivery of its ambitious capital programme, investing in projects that provide long-term benefits for Brent residents. This includes investment in new and affordable homes, regeneration schemes, infrastructure and other assets that support economic growth and help improve outcomes for local communities. Such investment is essential if we are to meet growing demand for housing and deliver on our Borough Plan priorities.
- 3.1.3 We recognise that increasing levels of borrowing bring additional financial pressures and exposure to risks associated with higher interest rates and the wider economic environment. However, borrowing decisions are taken carefully and only where they support the Council's statutory functions and long-term investment objectives. Throughout the year, the Council has continued to take a prudent and measured approach to managing its debt portfolio while ensuring funding is available to deliver key priorities for residents.
- 3.1.4 While the financial challenges facing local government remain significant, I am reassured by the strong financial management and treasury expertise demonstrated by our finance teams. I would like to thank colleagues across the Finance service for their continued hard work and diligence in managing the Council's resources and supporting sound financial decision-making across the organisation. However, effective financial management is not solely the responsibility of the Finance team. Every member of staff has a role to play in ensuring that the Council's resources are managed effectively, that value for money is achieved and that every pound spent supports better outcomes for Brent residents. Together, this collective commitment will help ensure the Council remains on a sustainable financial footing while continuing to invest in the future of our borough.
- 3.1.5 This report demonstrates that, despite a challenging economic environment, the Council has continued to manage its treasury activities responsibly and prudently. By balancing the need to invest in Brent's future with the need to protect the Council's long-term financial sustainability, we are ensuring that investment today delivers lasting benefits for current and future generations of residents.
- 3.1.6 The regular reporting of treasury management activities assists Members to scrutinise officer decisions and monitor progress on the implementation of the borrowing and investment strategy approved by Full Council. Effective governance and scrutiny of treasury management activities supports

achievement of the borough plan as it reduces risk and controls costs ensuring resources are available to deliver the Council's priorities.

3.1.7 Treasury management plays a key role in the delivery of the Council's ambitious Capital programme as it ensures funds are available and borrowing is affordable. The Capital Programme represents the Council's strategic investment designed to address key Council priorities, from improving the public realm to investing in affordable housing.

3.1.8 The Council's treasury management activity is underpinned by the CIPFA Code, which requires authorities to produce annually Prudential Indicators and a Treasury Management Strategy Statement on the likely financing and investment activity.

3.2 Background

3.2.1 The Council borrows money over the long term to support investment in the Council's ambitious capital programme and invests cash balances held for short periods. It is therefore exposed to financial risks including the loss of invested funds, insufficient cash balances to meet payment obligations, and the revenue impact of changing interest rates. The successful identification, monitoring and control of risk are central to the Council's treasury management strategy.

3.2.2 In line with the CIPFA Code, the Council approves three key Treasury Report:

- Treasury Management Strategy (approved alongside the budget) for the upcoming year;
- Mid-year Treasury Outturn Report which provides a half-year update on Treasury Performance; and
- Treasury Management Outturn Report which updates Members on the full years activity and Treasury performance

3.2.3 The 2021 Prudential Code includes a requirement for local authorities to provide a Capital Strategy, a summary document approved by full Council covering capital expenditure and financing, treasury management and non-treasury investments. The Council's Capital Strategy and Treasury Management Strategy were approved by full Council at a Budget and Council Tax Setting Council meeting on 10 February 2025.

3.3 Economic Background

3.3.1 Appendix 1 provides a full and detailed economic commentary for the financial year

3.3.2 UK annual Consumer Price Index (CPI) inflation generally eased during the year but remained above the Bank of England's 2% target. The US/Israel-Iran conflict increased inflationary risks through higher oil and commodity prices.

3.3.3 The Bank of England's Monetary Policy Committee (MPC) Bank Rate at the start of the financial year was 4.5% and at the end of the year was 3.75% . It has been held at this level since due to uncertainty following escalating geopolitical tensions.

3.3.4 Credit conditions remained resilient despite market volatility. Arlingclose, the Council's Treasury Advisors, maintained their recommended counterparty duration limits, with the Authority continuing to invest within approved credit risk parameters.

3.4 Local Context

3.4.1 At 31 March 2026, the Council had a net borrowing position of £1,030.3m. The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR). This is the amount of the Capital Programme, past and present, that is funded by borrowing. Alternatively, the Capital Programme can be funded by internal borrowing. Internal borrowing is the use of an authority's own cash resources, such as revenue balances, reserves, and earmarked funds (including General Fund balances and Community Infrastructure Levy (CIL) receipts), to temporarily finance capital expenditure instead of taking out external borrowing. Internal borrowing reduces interest costs in the short-term because it reduces the need to finance the capital programme through borrowing. Balance sheet resources are the underlying resources available for investment. These factors are summarised in Table 1 below.

Table 1: Balance Sheet Summary

	31-Mar-25	31-Mar-26
	Actual	Actual
	£m	£m
General Fund CFR	1,010.5	1,044.0
HRA CFR	343.3	368.3
Loan CFR (excluding PFI and leases)	1,353.8	1,412.3
PFI & Lease Liabilities	70.6	61.7
Total Loan CFR	1,424.4	1,474.0

	31-Mar-25	31-Mar-26
	Actual	Actual
	£m	£m
External borrowing (Excluding accrued interest and PFI/Leases) *	900.0	1,074.1
Investments (or new borrowing)	47.3	43.8
Net borrowing (borrowing less investments)	852.7	1,030.3

	31-Mar-25	31-Mar-26
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	Actual	Actual
	£m	£m
Loan CFR (excluding PFI and leases)	1,353.8	1,412.3
External borrowing (Excluding accrued interest and PFI/Leases) *	900.0	1,074.1
Internal Borrowing (Loans CFR less external borrowing)	453.8	338.2

- 3.4.2 The General Fund CFR was reduced by £16.5m following the application of Minimum Revenue Provision (MRP) charges excluding PFI/Leases. MRP is a prudent charge to revenue for the repayment of borrowing in the General Fund. When we charge MRP, we are effectively setting aside money from the revenue budget to repay part of that borrowing need. This reduces our underlying need to borrow, so the CFR reduces as well.
- 3.4.3 The Housing Revenue Account is a ringfenced account to record income and expenditure related to social housing. As permitted by regulations, the Council appropriates HRA land to the General Fund for the purposes of regeneration and development. During the year, several completed housing schemes appropriated from the General Fund to the HRA. In total, assets with a certified value of £30.0m were appropriated from the General Fund to the HRA and the respective CFRs were adjusted.
- 3.4.4 The movement in the Loan CFR of £58.5m between 31 March 2025 and 31 March 2026 is shown in table 2 below.
- 3.4.5 The Council's net borrowing position (less investments) increased from £852.7m to £1,030.3m. The Council's external borrowing as 31 March 2026 £1,074.1m excluding £61.7m PFI and Leases and was within the Prudential Indicator for external borrowing. Actual loan CFR as at 31 March 2026 stood at £1,412.3m. This can be split between the General Fund (£1,044.0m) and the HRA (£368.3m). The difference between the Loan CFR and external loans is internal borrowing. Internal borrowing occurs due to timing differences when capital expenditure that is meant to be financed through external debt is instead paid for through cash resources that are intended for other purposes. Cash is replenished later. The Council's borrowing position is further discussed later in the report in the borrowing section.
- 3.4.6 In addition, working capital increased from £89.6m at 31 March 2025 to £159.2m at 31 March 2026, primarily due to a £70m increase in debtors during the year. This was partially offset by a £10m reduction in creditors, resulting in an overall increase in net working capital. Working capital represents the difference between current assets and current liabilities and is an important indicator of the Council's short-term liquidity position. An increase in working capital generally reflects a higher level of resources due to the Council relative to obligations falling due in the short term. While these balances are expected to convert into cash in due course, the timing of receipt can influence the Council's cash flow and treasury management activities, including the level of investments held and the need for short-term borrowing. As such, movements

in working capital are an important consideration in managing the Council's day-to-day liquidity.

Table 2: Movement in CFR

Movement in CFR	£m
Opening Loan CFR 1 April 2025	1,353.8
Closing Loan CFR 31 March 2026	1,412.3
Change in Loan CFR	58.5
Capital expenditure 2025/26	209.9
Capital expenditure Financing	(108.8)
MRP	(16.5)
Service Loans Repaid	0.0
Accounting adjustments (PFI/Leases)	(26.1)
Total Movements in CFR	58.5

3.4.7 The treasury management position at 31st March 2026 and the change during the year is shown in Table 3 below.

Table 3: Treasury Management Summary

	31-Mar-25	Movement	31-Mar-26
	Actual		Actual
	£m		£m
Short-term Borrowing	130.4	21.8	152.2
Long-term Borrowing	769.6	152.2	921.9
Total External Debt	900.0	174.1	1,074.1
Money Market Funds	47.3	(3.5)	43.8
Local Authority Cash Investments	0.0	0.0	0.0
Total Cash Investments	47.3	(3.5)	43.8
Net Debt	852.7	177.6	1,030.3

3.4.8 Borrowing increased during 2025/26 to support the Council's long-term capital investment programme as internal cash resources continued to be utilised. The additional borrowing requirement was driven by the delivery of the capital programme where expenditure was not funded through grants, contributions, capital receipts or reserves. New borrowing was undertaken throughout the year in line with the Council's treasury management strategy, adopting a "little and often" approach to manage exposure to continued interest rate volatility. Although market interest rates remained volatile during the year, this approach enabled the Council to secure funding as required while managing borrowing costs and ensuring sufficient liquidity to support the delivery of the capital programme. More detail on borrowing is provided in section 3.5 onwards.

- 3.4.9 Cash investments decreased over the year following the repayment of maturing debt and ongoing investment in the Council's capital programme. Although the Council's working capital increased during 2025/26, this was primarily driven by higher year-end debtor balances rather than additional cash resources. As a result, the increase in working capital did not translate into higher cash available for investment, with cash balances continuing to be utilised to support the capital programme and debt repayments.
- 3.4.10 Appendix 2 details the debt and investment portfolio as at 31 March 2026.

3.5 Borrowing Strategy and Activity

- 3.5.1 As outlined in the Treasury Management Strategy, the Council's main objective when borrowing is to strike an appropriately low risk balance between securing low interest costs and achieving cost certainty over the period for which funds are required, with flexibility to renegotiate loans should the Council's long-term plans change being a secondary objective. The Council's borrowing strategy continues to address the key issue of affordability without compromising the longer-term stability of the debt portfolio.
- 3.5.2 Gilt yields slightly decreased over most of the period; reflecting expectations of lower interest rates, limited economic growth and, to some extent, an improvement in the UK governments fiscal position following tax rises in the autumn budget. Subsequent to the war in the Middle East however, gilt yields rose rapidly.
- 3.5.3 The PWLB certainty rate for 10-year maturity loans was 5.38% at the beginning of the period and 5.72% at the end. Rates for 50-year maturity loans ranged from 5.46% to 6.24%. The cost of short-term borrowing from other local authorities has been a little above Base Rate for most of the period, with interest rates between 4.0% and 4.5%. However, as is commonly seen due to high demand level, rates on inter-authority borrowing rose higher towards the end of the financial year to rates of over 5.0%.
- 3.5.4 The average interest rate on the Council's external borrowing increased marginally from 3.85% at 31 March 2025 to 3.90% at 31 March 2026. This was primarily due to the Council undertaking new borrowing to finance its capital programme. Whilst interest rates fell during the year, the rates available for new PWLB borrowing remained higher than the average rate payable across the Council's existing debt portfolio. Consequently, the addition of new borrowing increased the overall weighted average cost of debt, albeit only marginally. The table below shows the interest rate changes in Bank rate and PWLB rates between financial year ends provided by Arlingclose.

Table 4: Interest rate changes

Interest rate changes	31-Mar-25	31-Mar-26
Bank Rate	4.5%	3.8%
1-year PWLB certainty rate, maturity loans	4.8%	5.0%

5-year PWLB certainty rate, maturity loans	4.9%	5.3%
10-year PWLB certainty rate, maturity loans	5.4%	5.7%
20-year PWLB certainty rate, maturity loans	5.9%	6.2%
50-year PWLB certainty rate, maturity loans	5.6%	6.1%

3.5.5 The CIPFA code of practice (2025/26) defines the Housing Revenue Account as statutory obligation to maintain a revenue account for local authority housing provision in accordance with Part 6 of the Local Government and Housing Act 1989 (England and Wales) (Section 3.5.11 of the Code). The PWLB currently provide a discounted a rate for new HRA loans.

3.5.6 The PWLB HRA rate which is 0.4% below the certainty rate is available up to March 2027. This discounted rate is to support local authorities borrowing for the HRA and for refinancing existing HRA loans. In 2025/26, the Council did not take out any new HRA loans. However, the Council will continue to monitor the opportunity to do so in line with the treasury management strategy and the council's HRA business plan and objectives.

3.5.7 CIPFA's 2021 Prudential Code is clear that local authorities must not borrow to invest primarily for financial return and that it is not prudent for local authorities to make any investment or spending decision that will increase the capital financing requirement and so may lead to new borrowing, unless directly and primarily related to the functions of the Council. PWLB loans are no longer available to local authorities planning to buy investment assets primarily for yield unless these loans are for refinancing or regeneration purposes. The Council has not invested in assets primarily for financial return or that are not primarily related to the functions of the Council and has no plans to do so.

3.5.8 The Council held loans of £1,074.1m as at 31 March 2026, an increase of £174.1m in year. Table 6 provides the breakdown of loan balances.

Table 5: Borrowing Position

Loan Type	01-Apr-25	New Loans	Repaid loans	31-Mar-26
	£m	£m	£m	£m
PWLB	675.5	230.0	(31.0)	874.5
LOBO	59.5	0.0	(20.0)	39.5
Banks & Pension Funds	95.0	0.0	0.0	95.0
Local Authority	70.0	65.0	(70.0)	65.0
Total Debt Outstanding	900.0	295.0	(121.0)	1,074.1

3.5.9 External borrowing increased from £900.0m to £1,074.1m during the year, reflecting the raising of £295.0m of new loans and the repayment of £121.0m of existing debt. Of the new borrowing undertaken, £230.0m was raised from the Public Works Loan Board (PWLb) on an Equal Instalment Principal (EIP) basis to support the Council's approved capital programme. EIP borrowing was preferred as it provides a structured repayment profile, with debt reducing progressively over the life of the loan, helping to manage the Council's long-term borrowing requirement and limiting future refinancing risk. No maturity (MAT) loans were raised during the year. Whilst MAT loans defer principal repayment until the end of the loan term, prevailing rates remained relatively high and would have locked the Council into higher long-term borrowing costs. The use of EIP borrowing therefore provided a more balanced approach, supporting capital investment while managing both financing costs and future debt repayment obligations.

3.5.10 In addition, £65.0m of short-term loans were raised from local authorities as part of the Council's treasury management strategy. Maintaining a proportion of borrowing on a short-term basis provides flexibility in managing cash flow requirements and the debt portfolio, while benefiting from lower borrowing rates than those available on longer-term loans. This approach helps balance cost and risk within the overall borrowing strategy. Local authority loans were raised at an average rate of 4.4% with an average duration of 365 days.

3.5.11 **Loan Restructuring:** No loans were restructured during 2025/26. The Council will continue to monitor and evaluate the opportunity to reschedule existing loans.

3.5.12 **LOBO Loans:** LOBO loans give the lender the option of increasing rates at a specified date and the Council the option to either accept the increased rate or repay the loan without penalty. As at 31 March 2026 the Council was holding £39.5m of LOBO loans. The Council repaid two LOBO loans in 2025/26 after the lender exercised their option. As a result, the Council's borrowing requirement increased, with the additional financing being met through borrowing from the Public Works Loan Board (PWLb) during the year within our overall borrowing need. The table below shows further information on the 2 LOBO loans repaid in 2025/26.

Table 6: LOBO Loans repaid:

LOBO loans repaid 2025/26	Amount	Rate	Original Maturity	LOBO Call date 2025/26	New rate proposed	Action taken by Authority
	£m	%				
Loan 1 - Dexia	10.0	4.1%	19/05/2055	19/05/2025	6.41%	Repaid
Loan 2 - Dexia	10.0	5.2%	26/02/2066	27/02/2025	6.24%	Repaid

3.5.13 The authority has one LOBO loan totalling £9.5m that is due for an interest rate review in 2026/27. The Authority has liaised with our treasury management advisors Arlingclose over the likelihood of the options being exercised. If the

option is exercised, the Council will undertake an analysis, in consultation with Arlingclose, over whether to repay the loan with available cash or further borrowing or accept the higher interest rates.

3.5.14 Forward Borrowing: There were no forward agreed loans as at 31 March 2026.

3.5.15 Other loans: The council has explored further opportunity to mitigate against interest rate risk. In early 2026/27, the GLA's Green Finance Fund approved a £12.0m loan at reduced interest rates to support the financing of the South Kilburn District Heat Network.

3.5.16 Maturity Profile of Debt

3.5.17 The table below shows the maturity profile for the Council's debt at 31 March 2026.

Table 7: Debt maturity profile

Maturity Profile at 31 March 2026 (£m)	2025/26	Proportion as a percentage %
<1 Year	152.1	14.2%
1-2 Years	114.8	10.7%
2-5 years	106.7	9.9%
5-10 Years	191.1	17.8%
10-20 Years	93.8	8.7%
20-30 Years	198.3	18.5%
30-40 Years	112.3	10.5%
40+ Years	105.1	9.8%
Total Debt	1,074.1	100.0%

3.5.18 The Councils average debt pool rate at 31 March 2026 was 3.9%. Further detail is shown in Appendix 2.

3.6 Treasury Management Investment Activity

3.6.1 Investment Activity

3.6.2 The CIPFA Treasury Management Code now defines treasury management investments as those investments which arise from the Authority's cash flows or treasury risk management activity that ultimately represents balances that need to be invested until the cash is required for use in the course of business. The Council holds invested funds, representing income received in advance of expenditure plus balances and reserves. Cash balances as at 31 March 2026

was £43.8m held primarily in liquid money market funds. The treasury investment position is shown in table 7 below.

Table 8: Treasury investment position

Treasury Investment Activity	31-Mar-25	Movement	31-Mar-26
	£m	£m	£m
Money Market Funds	47.3	(3.5)	43.8
Total Cash Investments (Excluding accrued interest)	47.3	(3.5)	43.8

- 3.6.3 The CIPFA Treasury Management Code requires local authorities to consider their counterparty policies in light of environmental, social and governance (ESG) information. The council makes additional considerations when investing in banks and funds for greater than a year, the Council will prioritise banks that are signatories to the UN Principles for responsible Banking and funds operated by managers that are signatories to the UN Principles for Responsible Investment, the Net Zero Asset Managers Alliance and/or the UK Stewardship Code.
- 3.6.4 Both the CIPFA Code and government guidance require the Council to invest its funds prudently, and to have regard to the security and liquidity of its treasury investments before seeking the optimum rate of return, or yield. The Council's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income. As a result, the Council invests in short-term investments with high credit ratings, providing security and liquidity.
- 3.6.5 The Authority is a long-term borrower, and new treasury investments are therefore primarily made to manage day-to-day cash flows using short-term low risk instruments. The existing portfolio of money market funds will be maintained to allow access to cash to fund daily cashflow outgoings.
- 3.6.6 The progression of risk and return metrics are shown in the extracts from Arlingclose quarterly investment benchmarking in the table 9 below.

Table 9: Investment benchmarking

	Credit Score	Credit Rating	Bail-in Exposure	Weighted Average Maturity (days)	Rate of Return
31.03.2025	4.88	A+	100%	1	4.53%
31.03.2026	4.85	A+	100%	1	3.80%
Similar Local Authorities*	4.62	A+	80%	192	4.29%
All Local Authorities*	4.60	A+	64%	10	4.46%

**Arlingclose clients only*

- 3.6.7 The Council's investment security remains strong and is broadly comparable with both similar London authorities and the wider group of local authorities advised by Arlingclose. Brent continues to maintain a slightly stronger average credit score (4.85) than both comparable London authorities (4.62) and the wider local authority average (4.60), whilst maintaining an average credit rating of A+. The weighted average maturity of investments remained at 1 day, significantly shorter than comparable London authorities (192 days) and the wider local authority average (10 days). The Council's cash balances naturally fluctuated throughout the year, ranging from £28.0m to £98.5m, reflecting the volatility in the timing of significant cash inflows and outflows. Variations are driven by the receipt of income, such as grants and local taxation, and payments relating to operational services, capital investment and borrowing.
- 3.6.8 Bail-in exposure is the risk that, if a financial institution experiences financial difficulty, certain liabilities may be written down or converted into equity to absorb losses. For local authorities, this means that investments with institutions subject to the bail-in regime could be at risk if the institution were to fail.
- 3.6.9 Whilst this highly liquid investment strategy provides maximum flexibility, it also means that 100% of Brent's investments remain subject to bail-in exposure, compared with 80% for similar London authorities and 64% across all Arlingclose local authority clients. Other authorities achieve lower bail-in exposure by diversifying into instruments such as strategic pooled funds, covered bonds and other non- -in investments. Brent's rate of return reduced from 4.53% to 3.80% during the year, reflecting the general decline in short-term investment rates as Bank of England interest rates eased.
- 3.6.10 Although this return is lower than the benchmark groups (4.29% and 4.46%), it is consistent with the Council's low-risk, highly liquid investment strategy. Although this return is lower than the benchmark groups (4.29% and 4.46%), it is consistent with the Council's low-risk, highly liquid investment strategy. The Council's significant capital programme, coupled with the volatility of daily cash flows and relatively limited surplus cash balances, requires investments to remain readily accessible. Consequently, the Council invests predominantly in same-day access money market funds, in line with the CIPFA Treasury Management Code's requirement to prioritise security and liquidity over yield. As liquidity improves and longer-term surplus cash becomes available, opportunities to diversify into alternative investment products will continue to be kept under review, where this can be achieved without compromising security or liquidity.

3.7 Non-Treasury Investment Activity

- 3.7.1 The definition of investments in CIPFA's revised 2021 Treasury Management Code covers all the financial assets of the Council as well as other non-financial assets which the Council holds primarily for financial return. Investments that do not meet the definition of treasury management investments (i.e.,

management of surplus cash) are categorised as either for service purposes (made explicitly to further service objectives) and or for commercial purposes (made primarily for financial return). All of the Council's non-treasury investments are held to further service objectives and are therefore categorised as for service purposes. The non-treasury investments are classified under shareholdings to subsidiaries and loans to subsidiaries, detailed in the paragraph below.

3.7.2 Investment Guidance issued by MHCLG and the Welsh Government also broadens the definition of investments to include all such assets held partially or wholly for financial return.

3.7.3 The Council held £287.5m in the following service investments as at 31 March 2026:

- Shareholding in subsidiaries: £43.9m (£36.4m in 2024/25).
- Loans to subsidiaries £212.6m (£216.2m in 2024/25).
- £17.1m loans to Schools academies and colleges
- £13.9m loan to West London Waste Authority.

3.7.4 I4B Holdings Limited is a company wholly owned by Brent Council that was incorporated on 16 December 2016. The Company was set up with the purpose of acquiring, letting, and managing a portfolio of affordable, good quality PRS properties. Properties would be let to homeless families at Local Housing Allowance (LHA) levels. This would enable the Council to either prevent or discharge its homelessness duty and therefore reduce TA costs.

3.7.5 As of 31st March 2026, the Council had provided loan financing of £179.2m to i4B (£182.4m in 2024/25) which is secured against the company's properties. In 2025/26, I4B converted £3.2m of working capital facility into shares, constituting a loan repayment. No other loans were repaid in 2025/26 as the loans are arranged on a maturity structure and repayable at the end of the loan term. The Council received £5.3m (£5.3m in 2024/25) in interest for loans to I4B. The loans are secured against the properties held within the company. The Council also holds an equity investment of £43.9m (£36.4m in 2024/25) that comprises of £1 shares. The increase in equity investment is the result of the £3.2m working capital conversion and an additional £4.3m shares that were issued by I4B to Brent in the year.

3.7.6 First Wave Housing (FWH) is a registered provider of social housing in Brent and is wholly owned by Brent Council. FWH's primary purpose is to provide good quality, affordable, secure, and well managed homes to Brent residents and to contribute to Brent's Housing Strategy. It does this by managing, maintaining and improving its stock of 216 rental properties.

3.7.7 As at 31 March 2026, Brent Council had loaned FWH £33.4m (£33.8m in 2024/25), secured against the properties held within the company. The Council

received £0.7m in interest for loans to FWH (£0.7m in 2024/25) and a capital repayment of £0.4m (£0.4m in 2024/25). There were no new loans advanced to FWH.

- 3.7.8 These investments generated £6.0m of income for the Council in 2025/26 (£6.0m in 2024/25). This investment income covers the borrowing cost of investing in housing through wholly owned subsidiaries. These borrowing costs would be incurred by the Council regardless of the method through which the Council develops new housing; however, this is the vehicle of choice for such investments.
- 3.7.9 Additional information is provided in Appendix 4 for West London Waste Authority and School/Academy service loans.

3.8 Treasury Performance: Capital Financing costs

- 3.8.1 The Authority measures the financial performance of its treasury management activities both in terms of its impact on the revenue budget and its relationship to benchmark interest rates, as shown in table 10 below.

Table 10: 2025/26 Capital financing Costs

Capital Financing Costs at Q4 2025/26 (£m)	2025/26
	Actual
Total Interest Payable & Expenses	41.1
Total Interest Receivable	(24.1)
Net Interest	17.0
MRP (Excluding PFI)	16.5
Total Interest & MRP	33.5
Total Capital Financing Costs	33.5
Transfer to earmarked reserves	5.4
Total outturn	38.9
Budgeted costs	38.9
Variance	0.0
Budgeted rate debt	5.0%
Average rate debt* (full portfolio excluding PFI and Leases)	3.1%
Average rate investments	3.8%

**Additional detail available in Appendix 2*

- 3.8.2 Treasury performance reflects on capital financing costs which primarily comprises interest payable on borrowing and the Minimum Revenue Provision (MRP), which is the statutory charge for the repayment of borrowing used to fund the Council's capital programme. During 2025/26, global economic uncertainty, limited availability of other sources to fund the capital programme and higher interest rates continued to place pressure on borrowing costs and the Council's medium-term financial position.

3.8.3 Forecasting capital financing costs remains complex due to the sensitivity of interest rates, the timing of borrowing, capital programme delivery, grant receipts and capital receipts. The Council's historic portfolio of LOBO loans also adds uncertainty as lenders retain the option to request refinancing under certain conditions.

3.8.4 The Council continues to actively manage these risks through its treasury management strategy by closely monitoring daily and medium-term cash flow requirements and adopting a "little and often" borrowing approach to take advantage of short-term reductions in interest rates and avoid holding cash for longer than necessary. This approach also provides flexibility to respond to changing market conditions and helps minimise overall borrowing costs. While maintaining sufficient funding to support the delivery of the capital programme.

3.9 Compliance

3.9.1 The Corporate Director, Finance and Resources reports that all treasury management activities undertaken during the year complied fully with the CIPFA Code of Practice and the Council's approved Treasury Management Strategy.

Compliance with the approved prudential indicators, and in particular the authorised limit and operational boundary for external debt is demonstrated within Appendix 4 (Prudential Indicators) as required by the 2021 CIPFA Treasury Management Code.

4.0 Stakeholder and Ward Member Consultation and Engagement

4.1 Given the nature of this report, there has been no stakeholder and ward member consultation and engagement.

5.0 Financial Considerations

5.1 The financial implications are noted in the report.

6.0 Legal Considerations

6.1 The legal basis for producing council reports on its Treasury Management Activities is founded on a combination of statutory requirements and professional codes which ensure that local authorities manage their financial resources effectively, maintaining public trust and uphold the principles of good governance.

6.2 The Local Government Act 2003 and the Local Authorities (Capital Financing and Accounting) Regulations 2003 require that regular reports be submitted to the relevant Council Committee, ensuring transparency, accountability and prudent financial management. Brent Council has adopted the CIPFA Code of Practice for Treasury Management in the Public Sector and operates its treasury management service in compliance with this code. As such, this report forms an element of the Council's reporting structure which involves, in due

course and following consideration by Cabinet, a report setting out the Council's Treasury Management activity for the year to be submitted to Full Council for approval.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1** There are no equity, diversity and inclusion considerations arising from this report.

8.0 Climate Change and Environmental Considerations

- 8.1** As part of the Council's Treasury Management Strategy, the Council will ensure an assessment is made with regards to environmental, social and governance (ESG) matters for the council's long-term investments.

9.0 Communication Considerations

- 9.1** No additional communication strategies are required for this report.

Report sign off:

Minesh Patel

Corporate Director, Finance and Resources

Legal considerations provided by:

Elizabeth Benjamin

Finance considerations provided by:

Amanda Healy

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Appendix 1: Economic Commentary 2025/26

Economic background: The financial year was largely dominated by two periods of significant uncertainty and volatility. The first being the US trade tariff 'Liberation Day' in April 2025 and the second was the US/Israel war with Iran at the end of February 2026.

After the initial fallout from US trade tariffs, the following months saw some improvements as equity markets made gains and bond yields eased modestly. However, in the UK this trend in bond yields reversed somewhat as an uncertain economic outlook together with concerns around the government's fiscal position and autumn Budget saw 'term premia' rise as investors demanded a higher return for holding gilts.

The Budget itself was more muted than had been expected. Despite a weak economic outlook, this helped UK markets perform better with gilt yields trending downwards, inflation easing, and expectations for cuts in Bank of England (BoE) Bank Rate increasing.

The end of February 2026 saw the start of the war between US/Israel and Iran. The conflict caused oil and other commodity prices to rise sharply as the shipping lanes in the region became effectively closed, restricting global oil supply. At the end of the period, the economic outlook remained highly uncertain in terms of its impact on inflation as well as countries' fiscal and monetary policy conditions around the globe.

Prior to the start of the war, headline UK consumer price inflation (CPI) inflation had generally been trending downwards, albeit the 3% in February 2026 was unchanged from January. Core CPI also stayed put at 3.1%. Inflation was expected to fall further over the coming months to the BoE's 2% target, but the war changed this. Inflation is now expected to rise again, but how quickly and by how much depends on the duration of the war and how long commodity prices are elevated.

The Office for National Statistics (ONS) reported the UK economy expanded by 0.1% in Q4 2025. This followed previous modest gains of 0.2% in Q2 and by 0.1% in Q3. Of the subsequent monthly figures, the ONS estimated that GDP showed no growth in January 2026. As this is from before the war started the impact on growth will not be seen formally in the data for a couple more months.

While the most recent labour market figures were slightly better than expected, the general trend has been one of persistent weakness. In the three months to January 2026, the unemployment rate rose to 5.2% (from 5.1%), while the employment rate held at 75.1%. Despite inflation being expected to rise in the coming months, labour market conditions remain loose and so any upward pressure on wages from general inflation is likely to be tempered by the weaker labour market environment.

After cutting Bank Rate to 3.75% in December 2025, the BoE's Monetary Policy Committee (MPC) voted 5-4 to hold rates in February 2026 and then unanimously to do so again in March. Until the war started, financial markets were expecting Bank Rate to be cut to 3.5% at the March meeting. However, the conflict in the Middle East quickly changed this. The MPC noted the risks to both inflation and growth and indicated they could move rates either up or down depending on the conditions. Financial markets quickly responded to this by pricing in rate hikes.

Following the March MPC meeting, Arlingclose, the authority's treasury adviser, revised its central interest rate view and now predicts Bank Rate will be held at 3.75%. However, the conflict makes the outlook for rates highly uncertain. In the short-term the risks are to the upside with the chance of higher Bank Rate should the MPC decide it wishes to quickly quash potential second-round effects from higher inflation. Further out, if Bank Rate is hiked quickly, the pace and magnitude of subsequent cuts could take it far lower than was previously anticipated as policymakers add significant stimulus to a much weaker economic growth outlook.

The US Federal Reserve had been cutting rates over the period, reducing Fed Funds Rate target range by 0.25% at its December meeting to 3.50%-3.75%. At the three subsequent meetings, the rate was held at the same range. Policymakers noted that while inflation was elevated, economic activity had been expanding but the war with Iran made the path of monetary policy highly uncertain. Despite this, the Fed still suggested that further rate cuts were likely in 2026 and 2027.

The European Central Bank (ECB) has kept its key interest rates on hold since June 2025, maintaining the deposit rate at 2.0% and main refinancing rate at 2.15%. At its March 2026 meeting, the ECB noted the war in the Middle East had significantly increased uncertainty, creating upside risks for inflation and downside risks for growth, leading it to revise up its forecasts accordingly.

Financial markets: After declining sharply early in the financial year following the announcement of US tariffs, sentiment in financial markets had improved but equity and bond markets remained volatile throughout. However, the latter part of the period was dominated by the US/Israel war with Iran, which saw equity markets fall sharply, and bond yields rise as concerns over the inflationary impact from sharply higher oil and other commodity prices outweighed the flight-to-quality into government bonds often seen in conflicts.

Equity markets had been registering gains after the declines during the April sell-off, but the war reversed this and markets saw another sharp drawdown. Both the FTSE 100 and 250 fell by around 10% over the month from the start of the conflict to the end of the financial year.

The period saw significant volatility in gilt yields. The 10-year UK benchmark gilt yield started the year at 4.65% and ended at 4.86%. However, over this time the 10-year yield hit a low of 4.23% and a high of 4.95% in the space of a month. It was a similar picture for the 20-year gilt which started at 5.18% and ended at 5.45% with a low and high of 4.92% and 5.55% respectively. The Sterling Overnight Rate (SONIA) averaged 4.01% over the 12 months to 31st March.

Credit review: Arlingclose maintained its recommended maximum unsecured duration limit on most of the banks on its counterparty list at 6 months. The other banks remain on 100 days.

Earlier in the period, Fitch upgraded NatWest Group and related entities to AA- from A+ and placed Clydesdale Bank's long-term A- rating on Rating Watch Positive. Fitch later upgraded Clydesdale Bank and HSBC, but downgraded Lancashire CC and Close Brothers.

Moody's affirmed OP Corporate's rating at Aa3 In May 2025. Later in the period, Moody's upgraded Transport for London, Allied Irish Banks, Bank of Ireland, Toronto-Dominion Bank, DZ Bank, Nordea and HSBC and downgraded Close Brothers. In the last quarter of 2025 S&P upgraded Clydesdale Bank, Allied Irish Banks and Bank of Ireland, and assigned Warrington Council a BBB+ rating.

After spiking in April 2025 following the US trade tariff announcements, UK credit default swap (CDS) prices had trended down before picking up modestly in October and November. After declining again in December and into the new calendar year, they rose sharply once again when the war in the Middle East started. They were still elevated at the end of the period, but prices for all banks on Arlingclose's counterparty list remained within limits deemed satisfactory for maintaining credit advice at current durations.

Overall, European banks' CDS prices have generally been flatter and lower compared to the UK, as have Singaporean and Australian lenders while some Canadian bank CDS prices have remained elevated since the beginning of the period in part due to ongoing trade tensions with the US.

Financial market volatility is expected to remain, and CDS levels will be monitored for signs of ongoing credit stress. As ever, the institutions and durations on the Authority's counterparty list recommended by Arlingclose remain under constant review.

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Appendix 2

Debt and Investment Portfolio 31/03/26

	Actual Portfolio as at 31 March 2026 (£m)	Average Rate as at 31 March 2026
External Borrowing:		
PWLB Maturity Loans	415.9	4.3%
PWLB Equal Instalment Principal Loans	458.6	
Fixed Rate Market Loans	95.0	2.6%
LOBO Loans	39.5	4.4%
Local Authority Loans	65.0	4.4%
Total External Debt	1,074.0	
Accrued Interest	10.2	0.0%
Total External Borrowing and Accrued Interest	1,084.3	
Other long-term liabilities		
PFI	34.7	3.78%
Finance Leases	6.1	5.38%
Total Long-term Liabilities	40.7	
Total Gross External Debt	1,125.0	
Investments		
Money Market Funds	43.8	3.8%
Fixed Term Deposits – LA	0.0	0.0%
Total Investments	43.8	
Net Debt	1,081.2	

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Internal Investments: Average Rate vs Credit Risk - Client Type

Y-axis: Average Return on Internal Investments (0.0% to 7.0%)

X-axis: Average Credit Risk Score - Valued Weighted Average (3 to 6)

Quadrants: LOW RISK (Left), HIGH RETURN (Right)

Legend:

- London & Met Boroughs (Purple Squares)
- Brent - 31/03/26 (Blue Circle)

Client Type	Average Credit Risk Score (X)	Average Return on Internal Investments (Y)
London & Met Boroughs	3.7	3.7%
London & Met Boroughs	4.2	4.3%
London & Met Boroughs	4.3	3.7%
London & Met Boroughs	4.4	3.8%
London & Met Boroughs	4.5	3.8%
London & Met Boroughs	4.6	3.8%
London & Met Boroughs	4.6	4.3%
London & Met Boroughs	4.6	4.4%
London & Met Boroughs	4.7	3.7%
London & Met Boroughs	4.7	3.8%
London & Met Boroughs	4.7	4.3%
London & Met Boroughs	4.8	3.7%
London & Met Boroughs	4.8	4.3%
London & Met Boroughs	4.8	4.4%
Brent - 31/03/26	4.8	3.8%
London & Met Boroughs	4.9	3.8%
London & Met Boroughs	5.0	3.8%
London & Met Boroughs	5.1	3.8%

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Appendix Four –2025/26 Outturn 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 four of 2025/26 (Outturn). Revised capital programme budgets at quarter four for future years have been provided.

Capital Expenditure & Financing at Q4 2025/26 (£m)	2024/25	2025/26	2026/27	2027/28	2028/29	Total 2024/25 to 2028/29
	Actual	Actual	Estimated	Estimated	Estimated	
Corporate Landlord	11.6	11.9	15.6	12.6	2.7	54.5
Housing GF	71.0	50.1	9.7	21.1	17.5	169.4
Schools	22.1	20.5	29.3	9.3	5.3	86.5
Regeneration	34.6	73.5	92.3	46.5	16.6	263.5
Public Realm	18.0	22.9	10.2	3.7	6.0	60.9
South Kilburn	20.4	12.3	36.8	23.7	11.4	104.6
St Raphael's	0.2	0.4	6.9	12.5	0.0	20.0
Housing HRA	60.9	18.3	88.8	11.6	0.4	180.0

Total Capital Expenditure	238.8	209.9	289.5	141.1	59.9	939.2
Financed By:						
Grants	52.0	65.6	38.3	11.3	6.1	173.4
Section 106	11.9	29.2	37.7	25.4	14.4	118.6
Capital Receipts	17.3	1.2	11.3	34.4	2.1	66.3
Earmarked Reserves	1.2	1.1	4.3	1.0	1.0	8.6
Major Repairs Reserve	16.6	11.2	17.2	0.0	0.0	45.0
Revenue Contributions	11.4	0.5	4.6	1.6	0.6	18.7
Borrowing	128.3	101.1	176.1	67.4	35.8	508.7
Total Capital Financing	238.8	209.9	289.5	141.1	59.9	939.2

(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 Council tax and in the case of the HRA, housing rent levels.

CFR Movement at Q4 2025/26 (£m)	2024/25	2025/26*	2026/27	2027/28	2028/29
	Actual	Actual	Estimated	Estimated	Estimated
Opening CFR	1,254.5	1,353.8	1,412.3	1,570.4	1,619.2
Capital Expenditure	238.8	209.9	289.5	141.1	59.9
External Resources	(63.9)	(94.8)	(76.0)	(36.7)	(20.6)
Internal Resources	(46.5)	(14.0)	(37.4)	(37.0)	(3.6)
MRP	(24.9)	(16.5)	(18.0)	(18.6)	(19.1)
Capital Loans Repaid	(0.8)	0.0	0.0	0.0	0.0
Accounting Adjustments	(3.3)	(26.1)	0.0	0.0	0.0
Closing CFR	1,353.8	1,412.3	1,570.4	1,619.2	1,635.8

*2025/26 draft accounts

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

(b) Gross Debt and the Capital Financing Requirement

To ensure that over the medium term, debt will only be for a capital purpose, the Council should ensure that debt does not, except in the short term, exceed the total of capital financing requirement in the preceding year plus the estimates of any additional capital financing requirement for the current and next two financial years. This is a key indicator of prudence. The table below shows that the Council expects to comply with this recommendation during 2025/26.

Gross Debt & the Capital Financing Requirement at Q4 2025/26 (£m)	2024/25	2025/26	2026/27	2027/28	2028/29
	Actual	Actual	Estimated	Estimated	Estimated
External Loans	900.0	1,074.1	1,174.0	1,235.2	1,274.6
PFI & Leases	70.6	61.7	60.0	60.0	60.0
Total External Debt Liabilities	970.6	1,135.8	1,234.0	1,295.2	1,334.6
Internal Borrowing	383.2	276.5	336.5	324.0	301.2
Capital Financing Requirement	1,353.8	1,412.3	1,570.4	1,619.2	1,635.8

(c) Liability Benchmark

The liability benchmark is an important tool to help establish whether the Council is likely to be a long-term borrower or long-term investor in the future, and so shape its strategic focus and decision making. The liability benchmark itself represents an estimate of the cumulative amount of external borrowing the Council must hold to fund its current capital and revenue plans while keeping treasury investments at the minimum level required to manage day-to-day cash flow.

Liability Benchmark at Q4 2025/26 (£m)	2024/25	2025/26	2026/27	2027/28	2028/29
	Actual	Actual	Estimated	Estimated	Estimated
CFR	1353.8	1412.3	1570.4	1619.2	1635.8
Less: Balance Sheet Resources	(496.1)	(453.6)	(453.6)	(453.6)	(453.6)
Net Loan Requirement	857.7	958.7	1,116.8	1,165.6	1,182.2
Plus Liquidity Allowance	20.0	20.0	20.0	20.0	20.0
Liability Benchmark	877.7	978.7	1,136.8	1,185.6	1,202.2

(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 Q4 2025/26 (£m)	2024/25	2025/26	2026/27	2027/28	2028/29
Authorised Limit	1,700.0	1,800.0	1,800.0	2,000.0	2,000.0
Operational Boundary	1,500.0	1,600.0	1,600.0	1,800.0	1,800.0

The Corporate Director for Finance and Resources confirms that there were no breaches to the Authorised Limit and the Operational Boundary during Quarter four 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 Q4 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 Q4 2025/26	Upper Limit	Lower limit	2025/26		
			Actual borrowing at 31.03.2026	Actual borrowing at 31.03.2026	Compliance with limits
	%	%	£m	%	
Under 12 months	40.0%	0.0%	152.1	14.2%	Yes
12 months & within 24 months	40.0%	0.0%	114.8	10.7%	Yes
24 months and within 5 years	40.0%	0.0%	106.7	9.9%	Yes
5 years and within 10 years	60.0%	0.0%	191.1	17.8%	Yes
10 years and within 20 years	75.0%	0.0%	93.8	8.7%	Yes
20 years and within 30 years	75.0%	0.0%	198.3	18.5%	Yes
30 years and within 40 years	75.0%	0.0%	112.3	10.5%	Yes
Over 40 years	75.0%	0.0%	105.1	9.8%	Yes
Total			1074.1	100.0%	

(g) Ratio of Financing Costs to Net Revenue Stream

This is an indicator of affordability and highlights the revenue implications of existing and proposed capital expenditure by identifying the proportion of the revenue budget required to meet financing costs, net of investment income.

Financing Costs to Net Revenue Stream at Q4 2025/26	Actual	Actual	Forecast	Forecast	Forecast
	2024/25	2025/26	2026/27	2027/28	2028/29
Financing Costs (Interest & MRP) (£m)	41.5	38.9	41.9	41.9	41.9
Net Revenue Stream (£m)	383.3	431.4	501.8	535.2	568.6
Proportion of net revenue stream (%)	10.8%	9.0%	8.3%	7.8%	7.4%

Financing costs can be further broken down as follows.

Capital Financing Costs at Q4 2025/26 (£m)	2024/25	2025/26	2026/27	2027/28	2028/29
	Actual	Actual	Estimated	Estimated	Estimated
Total Interest Payable & Expenses	35.3	41.1	47.7	53.4	52.3
Total Interest Receivable	(17.8)	(24.1)	(25.8)	(31.4)	(31.4)
Net Interest	17.5	17.0	22.0	22.0	20.9
MRP (Excluding PFI)	15.1	16.5	18.0	18.6	19.1
Total Interest & MRP	32.6	33.5	40.0	40.6	40.0
Revenue Contributions to Capital Programme	8.9	0.0	0.0	0.0	0.0
Transfer to earmarked reserves	0.0	5.4	0.0	0.0	0.0
Total Capital Financing Costs	41.5	38.9	40.0	40.6	40.0

(h) Upper Limit for Total Principal Sums invested over 364 Days

The purpose of this limit is to contain exposure to the possibility of loss that may arise because of the Council having to seek early repayment of the sums invested.

Upper Limit for Total Principal Sums invested over 364 Days at Q4 2025/26 (£m)	2024/25	2024/25	2025/26	2025/26
	Approved	Actual	Approved balance	Actual
Upper Limit for Total Principal Sums Invested Over 364 Days	50.0	0.0	50.0	0.0

(i) Security

The Council has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit rating of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

Credit Risk Indicator at Q4 2025/26	2024/25	2024/25	2025/26	2025/26
	Approved	Actual	Approved	Actual
Portfolio average credit rating	A	A+	A	A+

(j) Liquidity

Liquidity Risk Indicator at Q4 2025/26 (£m)	2024/25	2024/25	2025/26	2025/26
	Approved minimum balance	Actual	Approved minimum balance	Actual
Total cash available within 3 months	20.0	47.3	20.0	43.8

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.

(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 Q4 2025/26 (£m)	2024/25	2025/26	2026/27	2027/28	2028/29
	Actual	Actual	Estimated	Estimated	Estimated
Treasury management cash investments	47.3	43.8	20.0	20.0	20.0
Loans and Investments for service purposes	252.6	256.5	296.0	295.6	295.1
Service investments other	32.9	31.0	30.4	29.7	28.9
Commercial investments: Property	0.0	0.0	0.0	0.0	0.0
Total Investments	332.8	331.3	346.4	345.2	344.0
Commitments to lend	0.0	0.0	0.0	0.0	0.0
Total Exposure	332.8	331.3	346.4	345.2	344.0

Service investments are further broken down in the tables below.

Loans & Investments for service purposes: Category of borrower at Q4 2025/26 (£m)	2024/25	2025/26	2025/26	2026/27	2027/28	2028/29
	Actual	Approved Balance	Actual	Estimated	Estimated	Estimated
i4b Holdings Ltd Subsidiary Loans*	182.4	500.0	179.2	211.2	211.2	211.2

i4b Holdings Ltd Subsidiary Equity**	36.4		43.9	51.9	51.9	51.9
First Wave Housing Ltd Subsidiary Loans	33.8		33.4	32.9	32.5	32.0
Total	252.6	500.0	256.5	296.0	295.6	295.1

	2024/25	2025/26	2025/26	2026/27	2027/28	2028/29
Service Investments Other Loans £m at Q4 2025/26 (£m)	Actual	Approved Balance	Actual	Estimated	Estimated	Estimated
Local Businesses	0.0	10.0	0.0	0.0	0.0	0.0
Schools, Academies and Colleges	17.6	55.0	17.1	16.9	16.7	16.4
West London Waste Authority	14.4	20.0	13.9	13.5	13.0	12.5
Local Charities	0.0	10.0	0.0	0.0	0.0	0.0
Housing Associations	0.0	50.0	0.0	0.0	0.0	0.0
Local Residents	0.0	5.0	0.0	0.0	0.0	0.0
Total	32.0	150.0	31.0	30.4	29.7	28.9

(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 Q4 2025/26 (£m)	2024/25	2025/26	2026/27	2027/28	2028/29
	Actual	Actual	Estimated	Estimated	Estimated
I4B Loans	182.4	179.2	211.2	211.2	211.2
I4B Equity	36.4	43.9	51.9	51.9	51.9
First Wave Housing (FWH)	33.8	33.4	32.9	32.5	32.0
Schools, Academies and Colleges	17.6	17.1	16.9	16.7	16.4
West London Waste Authority	14.4	13.9	13.5	13.0	12.5
Total Service investments	284.6	287.5	326.4	325.2	324.0
Total Funded by Borrowing	284.6	287.5	326.4	325.2	324.0

(m) Investment Rate of Return

This indicator demonstrates the rate of return obtained from the different investment categories.

Investments net rate of return at Q4 2025/26	2024/25	2025/26	2026/27	2027/28	2028/29
	Actual	Actual	Estimated	Estimated	Estimated
Treasury management investments	4.53%	3.82%	3.75%	3.75%	3.75%
Service investments	2.40%	2.60%	3.00%	3.00%	3.00%

(n) Other Investment Indicators

Other investment indicators at Q4 2025/26 (£m)	2024/25	2025/26	2026/27	2027/28	2028/29
	Actual	Actual	Estimated	Estimated	Estimated
External Debt (Loans)	900.0	1,074.1	1,174.0	1,235.2	1,274.6
Net Service Expenditure	387.3	431.4	501.8	535.2	568.6
Debt to net service expenditure ratio	2.3	2.5	2.3	2.3	2.2

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