



Cabinet

Monday 9 November 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
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1	Apologies for Absence	
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2	Declarations of Interest	
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Members are invited to declare at this stage of the meeting, the nature and existence of any relevant disclosable pecuniary or personal interests in the items on this agenda and to specify the item(s) to which they relate.

3	Minutes of the Previous Meeting	1 - 16
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To approve the minutes of the previous meeting held on Monday 12 October 2026 as a correct record.

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

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

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

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

Corporate Director Finance & Resources reports

7	Believe in Brent: Council Plan 2026 - 2030	17 - 78
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The purpose of this report is to present the Brent Council Plan, *Believe in Brent 2026 – 2030*, to Cabinet in advance of its referral to Full Council on 16 November 2026 for final approval.

Ward Affected:
All Wards

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

Contact Officer: Amira Nassr, Deputy Director
Democratic & Corporate Governance
020 8937 5436
amira.nassr@brent.gov.uk

8 Q1 Corporate Performance Update

79 - 102

This report provides an update on performance against the Borough Plan 2023–2027 key performance indicators for Quarter 1 of 2026/27, supported by the performance scorecard and commentary on specific areas of performance.

Ward Affected:
All Wards

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

Contact Officer: Grace Hall, Policy and Performance Manager
Tel: 020 8937 1471
grace.hall@brent.gov.uk

Children, Young People & Community Development reports

9 School Place Planning Strategy 2024 - 2028 Third Refresh

103 - 160

This report provides Cabinet with a third refresh of the School Place Planning Strategy 2024-2028, approved by Cabinet in October 2023 with refreshes approved by Cabinet in November 2024 and November 2025.

Ward Affected:
All Wards

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

Contact Officer: Shirley Parks, Director - Education Partnerships and Strategy
Tel: 020 8937 4529
Shirley.Parks@brent.gov.uk

Housing & Resident Services reports

10 Rent Setting Policy Statement

161 - 184

This report seeks Cabinet's approval of Brent's Rent Setting Policy. The policy establishes the framework through which rents for Housing Revenue Account (HRA) properties will be set, reviewed and varied in accordance with the Regulator of Social Housing's Rent Standard 2026 and associated guidance.

Ward Affected:
All Wards

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

Contact Officer: Spencer Randolph, Director -

11 Housing Management Policies 185 - 376

This report seeks Cabinet approval for a set of Housing Management Policies. The policies covered by this report are the Anti-Social Behaviour Policy, Compliance (Asbestos, Fire, Gas, Mechanical Electrical Services and Water) Policies, Vulnerabilities and Reasonable Adjustments Policy and Housing Compensation and Remedies Policy.

Ward Affected: All Wards
Lead Member: Cabinet Member for Housing, Homelessness & Renters (Councillor Robert Johnson)
Contact Officer: Spencer Randolph, Director of Housing Services
 020 8937 2546
Spencer.Randolph@brent.gov.uk

12 Housing Management Complaints Performance and Service Improvement Annual Report 2025/26 377 - 436

This report sets out the Housing Management Service's annual complaints performance for the period 1 April 2025 to 31 March 2026. It provides an overview of complaint volumes, complaint outcomes, compensation awarded, the key themes and causes of complaints, and the learning and service improvements that have been implemented as a result.

Ward Affected: All Wards
Lead Member: Cabinet Member for Housing, Homelessness & Renters (Councillor Robert Johnson)
Contact Officer: Spencer Randolph, Director - Housing Services
 Tel: 020 8937 2546
spencer.randolph@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 7 December 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 12 October 2026 at 10.00 am

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

1. **Apologies for Absence**

Apologies for absence were received from Councillor Grahl along with Kim Wright (Chief Executive) and Rachel Crossley (Corporate Director Service Strategy & Reform).

2. **Declarations of Interest**

No declarations of interest were made during the meeting.

3. **Minutes of the Previous Meeting**

Cabinet **RESOLVED** that the minutes of the previous meeting held on Monday 7 September 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 at the meeting.

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

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

7. **Change in Order of Business**

NOTED the change in order of business on the agenda, with Councillor Muhammed Butt (as Leader of the Council) advising that Agenda Item 10 (Homelessness & Rough Sleeping Action Plan 2026-2031) would be considered in advance of the remainder of the agenda, due to Councillor Georgiou having requested to speak on the item.

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

8. **Homelessness and Rough Sleeping Action Plan 2026 - 2031**

Prior to considering the report, Councillor Muhammed Butt (as Leader of the Council) welcomed Councillor Georgiou to the meeting who he advised had requested to speak in relation to the Homelessness and Rough Sleeping Action Plan.

Whilst recognising the positive commitments contained within the Action Plan and thanking frontline officers and voluntary organisations for their ongoing work supporting residents experiencing homelessness, Councillor Georgiou began by highlighting what he felt was a need to ensure the Council's approach remained focused on the prevention of homelessness rather than purely managing the consequences of an escalating housing crisis.

Expressing concern at the numbers of households with children living in temporary accommodation and recorded level of rough sleeping, emphasis was placed on the impact these circumstances had on families with children whose education was disrupted, and people whose health, security and dignity were also being put at risk. Whilst therefore welcoming the commitment to improve temporary accommodation standards and ensure no child was required to share kitchen or bathroom facilities with another household, it was noted that improvements in the quality of accommodation being offered would not reduce the overall number of people experiencing homelessness or families living in temporary accommodation. As such, Cabinet was urged to place greater emphasis on prevention and early intervention measures aimed at stopping residents from falling into homelessness. This included calls for a more proactive and coordinated approach across Council services and partner agencies, including housing, benefits, education, health and voluntary sector organisations, with the importance of creating clear pathways to support residents facing rent arrears, eviction, financial hardship or changing personal circumstances also highlighted.

Reference was also made to successful approaches adopted across other London boroughs in seeking to recognise best practice and tackle the challenges identified. Measures outlined included the expansion of mediation between landlords and tenants, access to debt and benefits advice and the potential establishment of a homelessness prevention fund to support residents facing short-term financial pressures, with it noted that preventative interventions could not only deliver positive outcomes but also longer-term financial savings for the Council in terms of cost avoidance relating to emergency accommodation and also prolonged housing insecurity.

In addition, the need was identified to ensure sustained support was available following the prevention or resolution of homelessness, particularly for refugees, care leavers, single people, residents experiencing mental ill health and those with multiple disadvantages, with Members advised that long-term housing outcomes depended not only on securing accommodation but also ensuring residents were able to successfully sustain their tenancies.

Following on, Councillor Georgiou also highlighted what he felt was a need to provide more regular and publicly accessible reporting on homelessness prevention outcomes, including the number of households assisted before becoming homeless, evictions prevented, lengths of stay in temporary accommodation and

progress in reducing overall homelessness-related expenditure, with the importance of transparency regarding performance monitoring identified as key.

As a final issue, reference was made to the ongoing need to address the shortage of genuinely affordable housing within the borough with a call to accelerate council housebuilding, improve the use of empty properties, increase suitable move-on accommodation and work collaboratively with housing associations and responsible private landlords to increase the supply of affordable homes for local residents. It was noted that, without addressing underlying housing supply pressures, the Council would continue to face increasing costs associated with managing homelessness rather than resolving its root causes. In concluding, Councillor Georgiou advised that whilst recognising the positive commitments and overall aims within the Action Plan, he was keen to ensure the approach adopted focussed on key outcomes in seeking to prevent and reduce homelessness, improve support for those experiencing housing insecurity and increase access to secure, affordable housing for Brent residents.

Having thanked Councillor Georgiou for his comments, Councillor Muhammed Butt (as Leader of the Council) acknowledged the challenge provided in seeking to ensure the Council's approach remained as focussed and wide as possible, with Councillor Johnson (as Cabinet Member for Housing, Homelessness and Renters) also highlighting the alignment of the Action Plan with many of the issues raised. These included not only a focus on joined up working but also early intervention and prevention alongside the support needed to sustain tenancies and improve the affordability, standard and quality of available accommodation.

Having noting the representations made, the Leader then invited Councillor Johnson to introduce the report from the Corporate Director, Resident and Housing Services outlining Brent's Homelessness and Rough Sleeping Action Plan 2026-2031, which detailed how the Council would deliver the commitments within its homelessness strategy focussed on prevention, improving the quality and reducing the use and cost of temporary accommodation and tackling long term rough sleeping.

Introducing the report, Councillor Johnson began by highlighting the aim of the Action Plan in seeking to turn the ambition within the Council's strategy for tackling homelessness into action through clear targets, responsibilities and measures of progress. Whilst acknowledging the challenges as significant, given the impact on those directly affected by the housing crisis, the complex range of social and economic factors involved with individuals or families becoming homeless was also recognised with the approach developed in response needing to involve more than simply providing suitable accommodation. Members were therefore advised of the aim within the Action Plan to focus on more holistic, wraparound support, bringing together not only housing but health, financial and other services enabling earlier intervention designed to prevent homelessness where possible and help people maintain a safe, secure and stable home.

Members were advised that the approach outlined had also been reflected in the targets set within the Action Plan, which had been focussed on preventing homelessness for 42% of households who approached the Council at risk of homelessness; halving rough sleeping by December 2027 and working towards functional zero for long-term rough sleeping by 2031 with the targets also aligned to

support the Government's national "Get Everyone In for Christmas" drive and funding commitment to provide settled accommodation and practical support.

Whilst highlighting that the context remained extremely challenging with homelessness demand continuing to rise across London, placing significant pressure on Councils and residents affected by housing insecurity, the progress being made was also noted including eliminating the use of B&B and shared accommodation for families with children beyond the legal limit and members assured of the Council's commitment in support of the national ambition to provide the stability and support required. As such, Councillor Johnson ended by commending the Action Plan as a means of building on the progress achieved to date and delivering the ambition to strengthen homelessness prevention, improve and reduce reliance on temporary accommodation, support residents in being able to sustain settled housing and working to reduce and end long term rough sleeping enabling more Brent residents to live in a safe, secure and stable home.

In supporting presentation of the report, Thomas Cattermole (as Corporate Director Housing & Residents Services) welcomed the tribute paid to frontline staff and partner organisations for the work being undertaken to support residents facing homelessness and housing insecurity. In highlighting the key focus on prevention, members were reminded this included work to not only support households seeking to maximise income but also in relation to enhancing the quality and affordability of temporary accommodation, supporting move on from poorer quality accommodation and improving access to the supply of permanent accommodation.

Acknowledging the projected increase in homelessness presentations and temporary accommodation usage highlighted, these were felt to reflect a realistic rather than more aspirational modelling and whilst welcoming legislative changes such as the Renters Right Act, members were advised that the primary objective remained reducing preventable homelessness and the number of households requiring temporary accommodation. In support of this approach reference was made to the positive impact being achieved through initiatives such as the Household Income Maximisation Team currently being piloted as a means of providing a multi-agency approach bringing together services across benefits, housing, adult social care, and children's services to address complex household challenges before they escalated on an individual case basis.

Members welcomed and commended the approach outlined in supporting vulnerable families and individuals to retain greater financial stability and prevent homelessness, which they were keen to see developed and expanded. Support was also expressed for the work being undertaken in partnership with charities and the voluntary and community sector, with particular reference made to organisations supporting homelessness prevention, rough sleeping services, and wider community outreach. Members highlighted the value of collaborative working between the Council, charities, housing providers, and other stakeholders in delivering coordinated support to residents and helping individuals secure and maintain stable accommodation.

In terms of additional comments highlighted by Cabinet in support of the Strategy and Action Plan, members were keen to highlight the importance of secure accommodation as fundamental to the health, wellbeing, safety, and long-term stability for residents and families. Whilst recognising the difficult decisions often

required in securing suitable accommodation, including placements outside residents' preferred locations, members acknowledged the need to prioritise safe and stable housing outcomes with officers and partner organisations commended for their ongoing efforts in responding to increasing demand and supporting vulnerable households.

In once again highlighting the importance in ensuring the Council continued to challenge itself whilst doing everything possible to address rising demand and improve outcomes for residents, the Leader ended by outlining the Council's ongoing commitment, as demonstrated within the Strategy and Action Plan, to reducing reliance on costly temporary accommodation, improving accommodation quality, supporting households to move more quickly into settled housing, and increasing the supply of suitable homes and the continued engagement with partners, stakeholders, and service providers identified as essential in ensuring the Council was able to deliver the most effective response possible to homelessness challenges across the borough.

In recognising the challenges identified, representations received and focus identified in relation to early intervention, prevention and increasing the supply of affordable accommodation Cabinet **RESOLVED**, having also noted the future engagement of scrutiny in the process, to approve and sign off the Homelessness & Rough Sleeping Action Plan for publication before 1 December 2026, as detailed within Appendix 1 of the report.

9. Authority to award a contract for a Single Delivery Partner for the South Kilburn Regeneration Programme

Councillor Kelcher (as Cabinet Member for Regeneration and Planning) introduced a report from the Corporate Director Neighbourhoods and Regeneration regarding the award of a contract for a Single Delivery Partner in relation to the South Kilburn Regeneration Programme.

In presenting the report, Councillor Kelcher began by outlining the significant progress already achieved through the South Kilburn regeneration programme, including the delivery of almost 2,000 new homes, of which over 1,200 had been at social rent, and with over 900 South Kilburn tenants having been moved into new, modern high-quality accommodation. Whilst recognising the difference regeneration could make in terms of transforming neighbourhoods and providing a sense of place, and way in which the Council had worked with residents, developers and housing providers to secure these achievements, members were advised that substantial work remained to complete the regeneration programme involving a new delivery approach designed to deliver the pace and scale of development required in order to deliver the required outcomes and ensure residents did not feel their neighbourhood had been overlooked.

Members were informed that, as a result, the report presented the outcome of a comprehensive and rigorous procurement exercise undertaken to identify a single development partner capable of delivering the remainder of the regeneration programme through one coordinated long-term partnership. The proposed approach was intended to replace the existing site-by-site delivery model, providing greater consistency, pace, efficiency and certainty in delivering the Council's vision for the neighbourhood, with the aim to support delivery of another 1,600 plus new

homes over the next 10 to 15 years, alongside affordable and social rented housing, community facilities, employment space, high-quality public realm improvements and green infrastructure.

In setting out the strategic vision for the proposal, Councillor Kelcher highlighted that successful regeneration involved more than the delivery of housing and was focused on creating thriving communities where residents felt safe, connected and proud of where they lived. In outlining the in-depth and significant nature of the procurement process and strength of bids submitted alongside their evaluation against a set of criteria developed in partnership with local residents, members were advised that the recommended award of contract and partnership was therefore intended to support place-shaping objectives, strengthen community infrastructure and help create a neighbourhood that residents could continue to identify with and take pride in for generations to come supported by a partner who had demonstrated they would be able to deliver against those outcomes.

In considering the report, Cabinet noted the process as one of the of the most significant housing and regeneration procurements currently taking place in London and welcomed the recommended appointment of a single delivery partner and move towards a more coordinated delivery model given the complexity and extended timescales associated with delivering regeneration through multiple site-based arrangements. In support of a single strategic partnership approach, members were, however, also keen to ensure a focus was maintained on the outcome for residents and in ensuring that the regeneration programme remained centred on the needs and aspirations of the South Kilburn community. In this respect, support was expressed for proposals relating to community facilities, opportunities for young people, support for local organisations, community capacity-building and wider social value commitments with the need identified to ensure the area's diverse community identity was also maintained and strengthened as a key objective throughout implementation of the programme.

Being invited to respond on this point, Jehan Weerasinghe (as Corporate Director, Neighbourhoods and Regeneration) took the opportunity to outline the way in which community engagement had formed a fundamental element of the procurement process and been reflected within the four core pillars against which the evaluation process had been undertaken which had included Brilliant Places, Empowered Communities, Resilient Partnerships and Value Creation. Members were also advised that the process had involved establishment of a Community Panel designed to maximise resident engagement and provide assurance that community priorities had directly informed the evaluation process, with the recommended partner having demonstrated a strong commitment to continued engagement and to keeping residents at the heart of future delivery arrangements.

Focussing on the key evaluation criteria, Cabinet also welcomed the emphasis on developing a resilient long-term partnership capable of sustaining delivery through changing economic and political circumstances, with it noted that the recommended partner had demonstrated a clear understanding of the Council's long-term ambitions for South Kilburn and had evidenced an ability to support place-making, community development and regeneration objectives.

The wider benefits associated with the programme were also recognised, including contributions towards community wellbeing, public health, community safety,

climate resilience, employment opportunities and enterprise growth. Members considered that the focus on social value and community benefit would be critical in ensuring that residents experienced tangible benefits from investment in the area and that regeneration outcomes extended beyond the delivery of new homes alone.

In summing up, Councillor Muhammed Butt (as Leader) thanked officers, residents and all bidders who had participated in the procurement process for their engagement and support. In acknowledging the challenges and issues identified by residents in relation to the delivery of the regeneration programme in South Kilburn to date, the Leader highlighted the importance in now being able to move forward at pace through procurement of a single delivery partner in order to address the issues identified and with the approach also considered key in creating a strong delivery vehicle and resilient partnership capable of achieving high-quality development, improved affordability, enhanced resident experience, greater accountability and long-term value for the community. The commitments secured in relation to affordable housing, place-making, public realm improvements, joined up estate management, social value, climate resilience and ongoing community involvement were also highlighted and welcomed with all those who had participated in the procurement thanked for their interest in what was recognised to have been a highly competitive process.

As a final contribution, Councillor Kelcher ended by noting that the appointment represented the beginning of the next stage of the regeneration programme rather than the end of the process with the strength of market interest from a number of highly credible bidders felt to reflect the confidence in the Council's regeneration programme, track record of delivery and long-term vision for South Kilburn.

In noting the recommended appointment of the preferred delivery partner as an important milestone in completing the transformation of the South Kilburn and wider area and delivering sustainable long-term benefits for residents along with key performance measures identified in relation to the quality and pace of delivery, resident experience, affordability and accountability Cabinet RESOLVED (having also noted the information contained within the exempt appendix to the report):

- (1) To note the procurement process undertaken to appoint a preferred bidder for the procurement of a Single Delivery partner.
- (2) Following on from (1) above, to approve awarding the contract to Ballymore Limited subject to satisfactory finalisation of contract terms and conclusion of the preferred bidder stage of the procurement exercise.
- (3) To delegate authority to the Corporate Director, Neighbourhoods and Regeneration in consultation with the Leader of the Council and Cabinet Member for Regeneration & Planning to finalise all the relevant aspects of legal and commercial agreements and enter into the contract with Ballymore Ltd as required by Contract Standing Order 88 following satisfactory completion of the preferred bidder stage.

10. Community Led Housing in Brent - Brentfield Road Site Agreement

Councillor Kelcher (as Cabinet Member for Regeneration and Planning) introduced a report from the Corporate Director Neighbourhoods and Regeneration providing

an update on the progress made by Brent Community Land Trust (BCLT) towards delivery of a Community Led Housing (CLH) development on the Brentfield Road site and seeking approval for delegated arrangements to support ongoing delivery of the scheme.

In presenting the report, Councillor Kelcher opened by highlighting what he felt to be the innovative nature of the scheme in seeking to deliver genuinely affordable housing and making better use of land owned by the Council with the Brentfield Road site identified as one which had been underused for an extended period of time. As a collection of disused garages, the area had become vulnerable to fly tipping and anti-social behaviour with the Community Led Housing scheme providing an opportunity to transform the site into 19 affordable one -bedroom homes, including wheelchair accessible accommodation, alongside communal facilities and landscaping.

The scheme was also commended in terms of the model behind its delivery involving the Brent Community Land Trust as a community-led organisation established by local residents and stakeholders with the aim of creating affordable homes on a ground up rather than top down basis, enabling the homes delivered to be controlled for community benefit with the aim to give the community a meaningful role in how the new homes were managed and stewarded in the future.

Working with BCLT and Sapphire Independent Housing, the aim was to bring council -owned land, community knowledge and housing expertise together to meet the identified need to increase the support of affordable homes whilst also meeting real local need. Recognising the significant progress made since Cabinet had last considered the scheme, members were advised that planning work and funding discussions had progressed with a Registered Provider partner now also in place and lease arrangements being developed. Alongside this process community engagement had also remained central to the project, with consultation continuing to help shape the proposals with the dedication of all those involved in its continued progression acknowledged and commended. Whilst recognising the issues still to be resolved, particularly around planning, funding and some of the historic rights affecting the site, members were advised the proposals within the report had been designed to provide the flexibility required to address the remaining matters and move the project forward towards delivery in a timely and efficient way.

In considering the report, Cabinet welcomed the initiative with specific support highlighted by Councillor Knight, as local ward councillor, for the scheme in seeking to utilise a long-standing underused site that would involve its transformation into affordable one-bedroom and accessible homes. Thanks were also extended to the Brent Community Land Trust for its continued engagement with ward councillors throughout the development of the scheme.

Cabinet were also keen to express ongoing support for the proposal as a genuine community-led housing model providing an opportunity to increase the supply of affordable housing whilst also supporting residents on the housing waiting list with the additional benefit of the Council being able to secure nomination rights for a number of the homes due to be provided through the scheme. On this basis the development was also regarded as an important pilot that could support the expansion of community land trust housing projects across the borough.

Members also noted the alignment with the Council's Housing Compact and wider ambition to increase affordable housing delivery through innovation, partnership working and local community involvement. Whilst recognising challenges remained in securing planning permission and development funding, Cabinet considered the scheme to offer significant benefits through the provision of the affordable homes due to be delivered, the productive use of underutilised council land and the delivery of accessible accommodation. Members were also keen to highlight the ongoing importance of working collaboratively with community organisations, housing partners and other stakeholders to address housing need across the borough, with the proposal recognised as demonstrating how innovative community-led approaches could complement the Council's own housing delivery programme whilst supporting broader objectives around affordability, accessibility and sustainable development.

In further support of the approach outlined, Cabinet recognised the potential for the scheme to act as a blueprint for future community-led housing initiatives and acknowledged the value of continuing to explore opportunities to maximise the use of council-owned land in support of innovative affordable housing delivery whilst also providing local people with a meaningful stake in their community. Having considered the report Cabinet therefore **RESOLVED** to:

- (1) Note the substantial progress made by Brent Community Land Trust towards delivering Community Led Housing at Brentfield Road.
- (2) Confirm the Council's continuing commitment to the delivery of Community Led Housing at Brentfield Road and to entering into a long lease arrangement broadly consistent with the principles previously approved by Cabinet.
- (3) Authorise officers to continue negotiations with neighbouring property owners regarding the release of historic rights affecting the development site and, if successful in these negotiations, to enter into the appropriate agreements (e.g. deeds of release) with the neighbouring property owners to release such rights.
- (4) Delegate authority to the Corporate Director, Neighbourhoods and Regeneration, in consultation with the relevant Cabinet Lead to determine whether reasonable attempts to secure voluntary release of private rights had been exhausted and, where considered necessary to facilitate delivery of the development and subject to planning approval, agree to appropriation of the site for planning purposes 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 together with any associated statutory actions required to address affected rights, subject to payment of any compensation properly due.
- (5) Delegate authority to the Corporate Director, Neighbourhoods and Regeneration to certify satisfaction of the conditions previously established by Cabinet regarding planning permission, funding, viability and community engagement requirements.
- (6) Delegate authority to the Corporate Director Neighbourhoods and Regeneration in consultation with the relevant Cabinet Lead to finalise and

complete Heads of Terms, the Agreement for Lease, and all ancillary legal documentation required to facilitate delivery of the development.

- (7) Delegate authority to the Corporate Director, Neighbourhoods and Regeneration to approve minor amendments to the scheme, contractual documentation or funding arrangements where required by statutory processes, funding bodies or delivery partners, provided such amendments do not materially alter the objectives of the scheme.

11. Quarter 2 Financial Forecast 2026-27

Given Councillor Grahl (as Deputy Leader and Cabinet Member for Finance & Resources) had submitted her apologies for absence, Councillor Muhammed Butt (as Leader of the Council) introduced a report from the Corporate Director Finance & Resources detailing the Q2 Financial Forecast 2026-27 in relation to the General Fund revenue budget, Housing Revenue Account, Dedicated Schools Grant and Capital Programme.

In presenting the report, Councillor Butt began by advising members that whilst recognising the nature of pressures identified, there were also signs that the approach taken over recent months was continuing to make a difference. Although highlighting that the General Fund was forecasting a £9m overspend, which was not where the Council wanted to be, it was felt important to recognise this represented an improvement of £0.5m since Q1. This movement had reflected a new overspend of £1.6m in Service Reform and Strategy, offset by a reduction of £1.8m in the forecast overspend in Residents and Housing Services and a new underspend of £0.3m in Finance and Resources. Whilst recognising that the ongoing pressures identified demonstrated a need to look beyond managing the immediate costs currently faced to address the underlying causes identified, the mitigating actions being taken (including the continued implementation of spending controls) were recognised which had involved the identification of £2.7m in-year savings, as a means of helping to mitigate budget pressures and prevent the financial position deteriorating further.

In noting the update on progress towards delivery of savings agreed by Full Council (as detailed within Appendix B of the report) members were advised that budget pressures continued to be reported within the Housing Revenue Account (HRA) with the Dedicated Schools Grant also forecasting an in year overspend due to continued pressures against budgets held for children with Education, Health and Care Plans.

In concluding, Councillor Butt recognised that there was more to do and the Council needed to maintain a firm grip on spending throughout the year but highlighted that the Council was not standing still and remained focussed in not only managing the current pressures but also on delivery of the longer term changes needed to reduce them whilst protecting the services residents relied upon and continuing to invest in Brent's future.

The Leader then invited Minesh Patel (Corporate Director Finance and Resources) to comment, who took the opportunity to remind members that as part of the 2026-27 budget setting process members had been advised about the required submission of a plan, under the Governments SEND reform package, to show how

it was managing the cumulative deficits in respect of the DSG High Needs Block up to the end of 2025-26. The Government had announced they would look to cover up to 90% of these deficits, subject to approval of the plan, with Members advised that the plan had now been submitted and the Government having indicated it had been accepted. Whilst welcomed, members were reminded that significant issues remained in relation to the forecast for the High Needs Block for 2026-27 and beyond with further details still awaited on the proposals for addressing any deficit for 2026-27, 2027-28 and beyond. Whilst recognising the ongoing nature of the pressures identified, members welcomed the approach adopted by the Government in terms of the commitment to SEND reform and to support local authorities in seeking to address the High Needs Deficit position.

Having thanked officers and Cabinet Members for their continued effort in seeking to manage the pressures identified and maintain financial resilience Cabinet **RESOLVED** to:

- (1) Note the overall financial position and the actions being taken to mitigate the issues arising, as detailed within the report.
- (2) Endorse and approve the budget changes set out in section 12 of the report.
- (3) Note the prudential indicators for treasury management in Appendix A of the report.
- (4) Note the update in relation to the savings delivery tracker in Appendix B of the report.
- (5) Approve the virements set out in sections 9.9 - 9.12 of the report.

12. **Update to Brent's Gypsy, Roma and Traveller Framework and Action Plan 2026 - 2030**

Councillor Johnson (as Cabinet Member for Housing, Homelessness and Renters) introduced a report from the Corporate Director Resident & Housing Services seeking Cabinet approval for an amendment to the Brent Gypsy, Roma and Traveller Framework and Action Plan, following its initial approval by Cabinet on 7 September 2026.

In presenting the report, Councillor Johnson advised that following adoption of the Framework at the previous Cabinet meeting London Gypsy and Travellers had approached the Council with a request to amend the section dealing with unauthorised encampments. Highlighting the importance in being able to ensure the voices of communities affected by the policy were heard, the representations received from the Gypsy, Roma and Traveller communities had been considered recognising the opportunity identified for the Council to improve the initial approach outlined. As a result, it was pointed out the proposed changes would involve removal of Appendix B from the original Framework and Action Plan, which set out the Council's current approach to unauthorised encampments, and introduction (in its place) of a commitment to explore negotiated stopping approaches for household pursuing a nomadic way of life. Whilst the changes proposed would provide officers with scope to consider the implications of allowing negotiated stopping, members were advised this would not involve committing to a particular

site or removing the council's existing legal powers. It would, however, demonstrate the Council willingness to explore whether negotiated stopping could work in Brent taking account of the wider implications in relation to housing, parks, environmental health, community safety and legal services.

Highlighting a need to ensure that the Council's policies were capable of evolving as a result of feedback received from those communities affected, it was felt the proposed amendment would provide an opportunity to do that in a pragmatic way while retaining the appropriate safeguards and oversight and demonstrating the Council's ongoing commitment to improving relationships with its Gypsy, Roma and traveller communities.

In considering the report members welcomed the approach outlined, which it was felt reflected a positive and responsive approach to engagement and commitment to listening, learning, and adapting to feedback as well as to the work being undertaken to reach and engage diverse communities. In that respect the work undertaken to strengthen engagement was also recognised as supporting wider outcomes including those relating to ongoing peer review activity in terms of public health and in the context of community involvement and inclusion.

In support of the approach outlined, Cabinet **RESOLVED**:

- (1) To approve the following amendments to the Gypsy, Roma & Traveller Framework and Action Plan:
 - (a) to remove Appendix B, which set out the Council's approach to unauthorised encampments; and
 - (b) to introduce a new commitment to explore negotiated stopping approaches to accommodate households pursuing a nomadic way of life.
- (2) To delegate authority to the Corporate Director for Residents and Housing Services to make any further amendments to the Framework and Action Plan, in consultation with the Cabinet Member for Housing, Homelessness and Renters.

13. **Brent Collaboration Charter**

Councillor Amadi (as Cabinet Member for Communities, Culture & Cost of Living Support) introduced a report from the Corporate Director Service Reform and Strategy seeking Cabinet endorsement of the Draft Brent Collaboration Charter 2026– 2029 as a shared agreement between Brent Council, the Voluntary, Community, Faith and Social Enterprise (VCFSE) sector and other local partners, including the NHS, designed to establish a shared vision, principles and commitments guiding how all would work together towards shared goals and better outcomes for residents.

In presenting the report, Councillor Amadi began by acknowledging the vital role voluntary community, faith and social enterprise organisations played in supporting residents highlighting the trusted relationships, local knowledge, and deep understanding of the communities they served and as key partners in tackling inequality, supporting well-being, and strengthening neighbourhoods. Having

outlined the key role the sector played, members were advised that the Charter had been designed to set out a clear framework in terms of how the Council and VCFSE partners worked together in order to establish clear expectations and ensure the partnership was able to deliver clear outcomes for residents.

Members were advised that the Charter had been developed through an extensive process of engagement and co-production with the opportunity taken to thank all those who had contributed for their engagement. Highlighting the three key ambitions at the heart of the Charter focussed around the delivery of a thriving and sustainable community sector; meaningful role for the sector in shaping local decisions and ensuring an active role for residents in shaping the places they lived, members were advised of the way in which the Charter had also been designed to provide clear responsibilities, stronger accountability and measurable outcomes to demonstrate what was being achieved and where further support or action was required. In supporting the development of a stronger network of support around the sector, the flexibility within the Charter to review and adapt priorities was also highlighted, enabling responses to develop as circumstances and needs changed.

Members were advised the Charter also recognised that the VCFSE sector in Brent contained organisations of varying size and capacity, with the approach developed in response focussed on bringing organisations together to share knowledge and experience to provide additional capacity and support, where needed. As an example of this in practice reference was made to the number of small grassroots organisations with strong community connections who often needed practical support with governance, funding applications and demonstrating their impact and ensuring size would not therefore limit the opportunity to contribute.

Members were also advised of the important role identified for the Council as a facilitator and a convener in seeking to bring organisations together, connecting expertise and helping partners to share knowledge and resources on the basis of a One Council approach designed to provide consistent support across all services with success measured by the collective outcomes being delivered for residents and support being provided for organisations across the sector in seeking to make a meaningful difference.

In considering the report, Cabinet welcomed the extensive engagement and co-production undertaken during the development of the Charter. Support was also expressed for the emphasis placed on building the capacity of smaller VCFSC organisations, recognising the important role they played in reaching and delivering tailored support to local communities across a number of key areas including community safety, crime and anti-social behaviour and the youth offer and engagement. It was recognised that many smaller, locally based organisations were deeply embedded within their communities and were often able to reach residents and groups that larger organisations could not. The Charter was therefore welcomed as a mechanism for ensuring a broader and more inclusive approach to partnership working across the borough.

Cabinet also noted the importance of strong governance and oversight arrangements within the Charter, with Members recognising the need to establish clear accountability whilst retaining the flexibility required to respond to emerging issues and changing local priorities and the enhanced governance framework

therefore considered an important step in strengthening the relationship and joint working arrangements between the Council and VCFSC sector.

In response to questions regarding capacity building, Councillor Amadi outlined the Council's commitment to supporting smaller organisations that may lack the resources, infrastructure or recognition of larger providers but possessed valuable local knowledge, community relationships and expertise. Members noted that support would include assistance with funding applications, bid development and access to facilities, enabling a wider range of organisations to contribute to delivering services and support for residents.

Members were also keen to support the Council's ambition to move towards a stronger convening and facilitating role, enabling it to work more strategically with delivery partners and align resources towards key borough priorities, including youth services, crime prevention, health inequalities and substance misuse with the opportunity provided within the Charter to strengthen partnership working and improve outcomes for residents also commended.

In summing up, Councillor Butt (as Leader) welcomed the direction of travel set out within the Charter, noting that it provided an opportunity to strengthen relationships with the VCFSC sector whilst also addressing gaps between previous partnership arrangements and the Council's wider policies and strategies. Members also noted the focus on participatory budgeting, commissioning and greater resident involvement in decision-making, which was seen as a means of enhancing transparency, strengthening partnerships and ensuring local communities could influence the services delivered within the borough.

In recognising the way in which the Charter would provide an opportunity to strengthen collaboration, improve governance and oversight arrangements, and establish a more strategic and sustainable approach to partnership working across the borough Cabinet **RESOLVED** to:

- (1) Agree and endorse the draft Brent Collaboration Charter, as set out in Appendix 1 of the report, and ensure a one council approach to supporting its implementation.
- (2) Note and endorse the establishment of a Voluntary, Community, Faith & Social Enterprise (VCFSE) Strategic Advisory Forum linked to emergent Brent Strategic Partnership structures that would provide overall oversight and ownership of the Charter, its implementation and delivery.

14. **Authority to invite tenders for Homecare Services for Adult Social Care and Children and Young People with Disabilities**

As the final item, Councillor Muhammed Butt (as Leader of the Council and Cabinet Member for Adult Social Care) introduced a report from the Corporate Director Service Reform and Strategy seeking approval to retender the contracts for Homecare Services for Adult Social Care and Children and Young People with Disabilities.

In presenting the report, Councillor Butt began by highlighting the context to the procurement approach outlined, which had come at a time when demand for

homecare was continuing to grow, care needs were becoming more complex and providers were faced by rising costs. In recognising the reform of adult social care as one of the great challenges facing public services, the opportunity was taken to outline how the framework for provision of the services outlined had been designed to support those needing support to live as independently and with as much dignity as possible. Reminding members of the size of the homecare service contract, reference was made to the annual £29m spend involving support being provided for around 1,700 adults and almost 250 children along with the responsibility to ensure the services remain sustainable, responsive and focused on the people who depended upon them. As such, the opportunity was also taken to outline the way in which the procurement process had been designed to align more closely with the neighbourhood operating model being introduced across the Council and work being undertaken with health partners to look at delivery of a more preventative early intervention approach to support those residents most in need. Members were advised that the approach also included a commitment to the London Living Wage, focus on maintaining CQC standards and to make better use of technology where it was recognised to benefit residents and deliver more reliable, responsive and consistent standards of care.

As a further contribution, Nigel Chapman (Corporate Director Children, Young People and Community Development) also welcomed the opportunity provided through the procurement process to secure good quality, cost effective packages of care support for children and families recognising the increasing demand for services and ability to provide the support required for them to lead more independent lives.

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

- (1) Approve inviting tenders for Homecare Services for Adult Social Care and Children and Young People with Disabilities on the basis of the pre - tender considerations set out in section 3.3.1 of the report.
- (2) Approve Officers evaluating the tenders referred to in (1) above on the basis of the evaluation criteria set out in section 3.3.1(vi) of the report.
- (3) Delegate authority to the Corporate Directors, Service Reform and Strategy and Children Young People and Community Development, in consultation with the Cabinet Member for Adult Social Care and the Cabinet Member for Children's Services, Employment and Climate Action to award the contracts for Homecare Services for Adult Social Care and Children and Young People with Disabilities for a term of three years, with the option to extend for a further three years and a final extension period of up to 24 months.

15. Exclusion of Press and Public

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

16. Any other urgent business

There were no items of urgent business.

The meeting ended at 11.10 am

COUNCILLOR MUHAMMED BUTT
Chair

	Cabinet 9 November 2026
	Report from the Corporate Director of Finance and Resources
	Lead Member – Deputy Leader & Cabinet Member for Finance and Resources (Councillor Gwen Grahl)
Believe in Brent: Council Plan 2026 - 2030	

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
List of Appendices:	Three Appendix A: Believe in Brent 2026 – 2030 Appendix B: Council Plan Engagement and Evidence Report Appendix C: Council Plan Equality Impact Assessment
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Amira Nassr, Deputy Director Democratic & Corporate Governance 020 8937 5436 amira.nassr@brent.gov.uk Grace Hall, Policy & Performance Manager 020 8937 1471 grace.hall@brent.gov.uk

1.0 Executive Summary

- 1.1. The purpose of this report is to present the Brent Council Plan, *Believe in Brent 2026 – 2030*, to Cabinet. Cabinet is asked to agree that the Council Plan is referred to Full Council on 16 November 2026 for final approval.
- 1.2. The purpose of the Council Plan is to set our direction of travel as an organisation for the next four years. It sets the high-level priorities which will guide our decisions on how we spend money and where we focus our resources to deliver high-quality services and good outcomes for residents. The

strategic, high-level nature of the Plan gives us a clear direction, as well as the flexibility to remain agile to changing circumstances, emerging pressures and new opportunities, and responsive to the Council's budget setting process.

- 1.3. The Council Plan sets out three priorities: 'A borough to be proud of' and 'A borough where people thrive', which set out **what** we will deliver for residents; and 'A council that delivers for you', which explains **how** we'll change the way we work to deliver for residents. The first two priorities are supported by a series of focus areas. These bring our priorities to life by setting out the tangible changes and improvements residents can expect to see as a result of our work.
- 1.4. Subject to adoption of the Council Plan by Full Council, an annual Delivery Plan will be developed alongside the Council's budget to translate the Council Plan's priorities into specific actions that we will take to deliver our ambitions. The Delivery Plan will support us to measure the impact that our work is having, and communicate regularly and transparently with residents about the progress we're making to deliver the Plan.
- 1.5. The Council Plan will inform our budget setting process, where spending commitments will be developed to enable delivery of Council Plan priorities. Through the budget setting process, decisions will need to be made about what to prioritise, and where trade-offs may be needed, to support delivery of the Council Plan's ambitions.
- 1.6. To develop the Council Plan, extensive engagement was undertaken with Leaders of the four Political parties in the Council, Councillors, residents and Brent Council staff. Officers drew on this engagement, analysis of the manifestos of each political party, given the Political operating context of the organisation, and data and local evidence to ensure that residents are central to, and have been reflected, in the Council Plan. More detail on the engagement and evidence that has informed the Council Plan is included in Appendix B.

2.0 Recommendation(s)

That Cabinet:

- 2.1 Endorse the Council Plan, *Believe in Brent 2026 – 2030*, to progress to Full Council on 16 November 2026 for final approval.
- 2.2 Note the Engagement and Evidence Report and Equality Impact Assessment, which accompany the Council Plan.

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 The Council Plan is our commitment to residents. It sets out our vision for how we will support our residents and communities and the priorities that will guide our work over the next four years. It reflects our strong ambition for Brent to be

a great place to live, work, visit, study, do business and raise a family, and the role the Council will play in achieving that.

- 3.1.2 This Plan has been shaped by what residents have told us matters most. We have listened carefully to feedback from our communities about their aspirations for Brent, the challenges they face, and the changes they want to see. We've drawn on what we've heard and looked carefully at the opportunities and challenges we face to shape our priorities.
- 3.1.3 This Plan is ambitious. We know that to make a real difference to residents' lives, we need to be bold and curious about how we can work differently. This Plan will help us to make choices about where we should focus our work to make life better for our residents and communities.
- 3.1.4 To deliver this Plan, we will develop an annual Delivery Plan, which will set out the key actions we'll take, how we will prioritise activity and how we will monitor our performance. We know that we can't do everything at once. The annual Delivery Plan will ensure that we can remain agile in a changing world, while maintaining our focus on the goals set out in the Council Plan.
- 3.1.5 The proposed Council Plan *Believe in Brent 2026 – 2030*, resets our priorities for the next four years and will act as the foundation for our decision making, service delivery, budgeting and allocation of resources. It will replace the previous Brent Borough Plan, which is due to expire in 2027.
- 3.1.6 At its heart, the Council Plan is about what Brent Council will do as an organisation to deliver for residents. The Council Plan that has been developed is a Corporate Plan in that it sets out the Council's organisational priorities and ways of working. It sets out both what the Council will do to deliver value for residents, and how we will work to achieve our goals. While delivering our priorities will often require us to work closely with partners, the Council Plan is focused primarily on the Council's role, commitments and contribution.
- 3.1.7 The Council Plan sets out three priorities: 'A borough to be proud of' and 'A borough where people thrive', which set out **what** we will deliver for residents; and 'A council that delivers for you', which explains **how** we'll change the way we work to deliver for residents.
- 3.1.8 The first two priorities are supported by a series of focus areas, which identify where we will concentrate our efforts to improve residents' lives. They bring our priorities to life by setting out the tangible changes and improvements residents can expect to see as a result of our work.

3.2 Background

The purpose of the Council Plan

- 3.2.1 The purpose of the Council Plan is to set our purpose and direction of travel as an organisation for the next four years. It sets out the priorities that will guide the decisions we make, help us focus our resources and shape the work we do

to deliver for residents. It sets out what we will deliver for residents, and how we will work to deliver those things.

How we will deliver the Plan

- 3.2.2 The Council Plan is a high-level, strategic document, which sets out our ambitions and the outcomes we want to achieve for residents. It will help us to clearly identify the actions that we should take, and investments we should make, to deliver on our ambitions. It builds on our existing work, by setting a renewed focus on what we're already doing well, while also identifying and embracing new opportunities to do more for residents.
- 3.2.3 The Council Plan will sit alongside and inform our budgeting process. The budgeting process will be guided by the priorities set out in the Council Plan, to ensure that our resources are directed towards the areas that matter most to residents. Our Medium Term Financial Strategy (MTFS) will be kept under review and adapted to reflect the Council Plan priorities, focus areas and Delivery Plan actions, ensuring that our resources are aligned with our ambitions and allocated where they can have the greatest impact.
- 3.2.4 An annual Delivery Plan will sit alongside the Council Plan and Council's budget. It will set out in more detail some of the key actions that we will take to deliver the ambitions in the Council Plan. It will focus on the actions that will make the biggest difference to residents and communities. It will align with the Council's budget and allow us to prioritise and stagger activity over the lifespan of the Council Plan, given that we won't be able to do everything at once.
- 3.2.5 The Delivery Plan will align with a set of key performance indicators (KPIs) that will be developed to help us measure, monitor and report on the progress we're making to deliver the Council Plan. Regular reporting on these indicators will be provided, so Members and residents can scrutinise performance, hold both Members and officers to account as well as identify areas for improvement.
- 3.2.6 Keeping residents informed about the progress we're making is important, so we will use both the Council Plan and Delivery Plan to share regular updates on the progress we're making and impact being delivered.

How the plan was developed

- 3.2.7 The Council Plan has been informed by detailed analysis of political parties' manifestos, engagement over several months with Group Leaders, councillors, residents, staff and partners and key data sets such as the Census. Officers have used this feedback and evidence to identify key themes about what matters most to residents, the challenges they're facing and the opportunities that there are to make Brent a better place to live, work, study, visit and do business. Those key themes have informed the priorities and focus areas which make up the Plan, and which have been regularly tested with Members. The process of developing the Plan has been iterative, with the emerging priorities and focus areas refined throughout the process as a result of ongoing engagement and feedback.

3.2.8 The Engagement and Evidence Report in Appendix B provides a detailed overview of the evidence, data and engagement that has shaped the Plan. Below is a high-level summary of the key engagement activities and evidence drawn from:

3.2.9 As well as speaking with Members about residents' views, we engaged directly with residents in a few key ways (the Resident Attitude Survey and the Council Plan Survey) to inform the development of the Council Plan. Further work to shape the Plan was also undertaken and is set out below.

Resident Attitudes Survey

3.2.10 The Resident Attitudes Survey (RAS) is a face-to-face survey of a representative sample of residents, which provides a snapshot of residents' views on their neighbourhoods, the council and their priorities. It is conducted every 4 to 5 years. The survey was carried out independently by DJS Research, an accredited Market Research Society Company Partner.

3.2.11 The sample was deliberately designed to reflect Brent's population, with quotas for age, sex, ethnicity, economic status and disability within each ward and sampling locations selected to reflect different levels of deprivation. The statistically reliable data was essential in understanding more about our residents and what their views and priorities are.

3.2.12 A summary of the key findings from the RAS is included in the Engagement and Evidence Report contained in Appendix B.

Council Plan survey

3.2.13 An online resident survey was conducted between 16 July to 30 August 2026 to gather insight on what residents wanted to see reflected in the Council Plan. 752 responses were received from individuals, community group representative and businesses. A detailed summary of the responses received, engagement approach adopted and benchmarking against other local authorities can be found in the Engagement and Evidence Report in Appendix B.

3.2.14 This survey was widely promoted to residents, businesses, community and voluntary sector organisations, faith groups and resident forums. Officers used a multi-channel approach to engagement which included promotion through our digital platforms, community outreach events, community engagement networks and partnerships to increase awareness of the survey.

3.2.15 During the consultation period, the Council Plan consultation page received **2,523 visits**, indicating strong awareness and interest, even where residents chose not to submit a survey response. Benchmarking data suggests Brent achieved a comparatively strong level of participation when measured against similar Council Plan consultations undertaken by other local authorities.

Political party manifestos

3.2.16 Officers analysed the manifestos of each political party elected to represent Brent, to understand where their priorities align and what residents voted for. The commitments set out in the various manifestos helped to inform the Council Plan priorities and focus areas, which were then tested and adapted through subsequent engagement activities with members, residents and staff.

Member engagement

3.2.17 Members engage with residents every day in many different ways. A crucial part of developing the Council Plan was drawing on Members' significant insight into what residents most value and want to see from their Council. Engagement with Members included:

- **Multiple conversations with the Administration Leader and Deputy Leader** throughout the development of the Plan, to get ongoing strategic input and direction.
- **Various individual briefings with each Opposition Political Group Leader** to get feedback on the overall approach and emerging priorities and focus areas. Political Group Leaders were also briefed on the findings of the Resident Attitudes Survey and how they informed the Council Plan.
- **A briefing with each Cabinet member** to get feedback on the overall approach to the Plan and its emerging priorities and focus areas, with a specific focus on each Cabinet members' area(s) of responsibility.
- **Discussions with Cabinet** where the Corporate Management Team and Cabinet discussed the approach to the new Council Plan and its priorities and focus areas.
- **A Political Group Leader Task and Finish meeting** where all Political Group Leaders were invited to provide feedback on the final draft of the priorities and focus areas.
- **A Pre-scrutiny meeting, where** Scrutiny members from the three scrutiny committees were invited to consider the draft Council Plan priorities and focus areas, ask questions, provide challenge and feedback, and contribute to the Plan's final development.

Staff and service insight

3.2.18 Small working groups of key officers met on a regular basis to review progress on development of the Council Plan and to provide key strategic and operational insights.

3.2.19 A staff survey was also conducted to ask staff what residents were telling them, what they believe the Council should focus our work on and what should change.

3.2.20 A summary of the key themes from staff feedback is included in the Engagement and Evidence Report in Appendix B.

Next steps

3.2.21 As required by the Constitution, following consideration by Cabinet, the Council Plan will be taken to Full Council on 16 November 2026 for adoption.

3.2.22 As the Council Plan will replace the previous Borough Plan, Full Council will be asked to approve minor amendments to the Policy Framework set out in the Constitution to reflect this change.

4.0 Stakeholder and ward member consultation and engagement

4.1 As noted above, there has been considerable engagement with Members, residents, staff and other partners throughout the development of the Council Plan. The process of developing the Plan has been iterative, in response to feedback from these different stakeholders.

4.2 The Engagement and Evidence Report in Appendix B provides more detail on the consultation and engagement undertaken and summarises the feedback that was received.

5.0 Financial Considerations

5.1 The Council Plan sets the Council's priorities for the next four years and will inform the Medium Term Financial Strategy (MTFS) and annual budget setting processes. This will ensure that decisions on the allocation of resources support delivery of the Council's priorities, whilst maintaining financial sustainability and securing value for money for residents.

5.2 The annual Delivery Plan will translate these priorities into more detailed activity and will be reflected through the Council's Integrated Business Planning process. This will bring together delivery and financial planning, enabling any associated resource requirements, savings or investment to be considered and incorporated into the MTFS.

6.0 Legal Considerations

6.1 In accordance with Part 3, Table 3, s1 of the Constitution, Full Council is responsible for the consideration and adoption of the Borough and Corporate Plan, amongst others, that form the Council's Policy Framework.

6.2 The current Borough Plan ends in 2027. The Council Plan will replace it, in setting the Council's vision for the next four years. As it forms part of the Council's Policy Framework documents it must be adopted by Full Council. Once adopted by Full Council, it is the responsibility of Cabinet and the Cabinet Committees to implement, in so far as it relates to Executive functions.

- 6.3 Part 2, Financial Regulations, paragraph 2.1.2 of the Constitution provides that long-term financial planning should be developed alongside the Council's overarching strategic plan.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 The Public Sector Equality Duty, as set out in section 149 of the Equality Act 2010, requires the Council, when exercising its functions, to have “due regard” to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, to advance equality of opportunity and foster good relations between those who have a “protected characteristic” and those who do not share that protected characteristic. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. The council also internally recognises care experience and socio-economic status as protected characteristics.
- 7.2 The Council Plan has been subject to an Equality Impact Assessment, attached as Appendix C, and Officers believe that there are no adverse equality implications, and that the Plan will assist in advancing equality of opportunity and fostering good relationships between different group.
- 7.3 The Council Plan is intended to benefit all residents, businesses and communities across Brent. However, some groups may experience particular benefits because of the Plan's focus on improving neighbourhoods, addressing inequalities, improving access to services and opportunities, and supporting those facing the greatest barriers or disadvantages. In particular, it is expected to have a positive impact on residents experiencing socio-economic disadvantage, those at risk of and experiencing homelessness, and children and young people. Further analysis and review of the EIA will be conducted regularly as the Plan is implemented
- 7.4 Actions taken to deliver on the Plan's priorities will be subject to an Equality Impact Assessment as required.

8.0 Climate Change and Environmental Considerations

- 8.1 The draft Council Plan includes several commitments to tackle the climate and ecological emergency, addressing all three key aspects: reducing emissions, supporting nature and biodiversity and adapting to extreme weather. Specific commitments include:
- Doing all we can to achieve Net Zero for our own corporate estate and operations by 2030.
 - Driving progress towards cleaner air across the borough.
 - Exploring making homes more resilient to changing climate conditions, including hotter, drier summers and colder, wetter winters.

- Investment in our parks and open spaces: creating greener spaces across the borough, planting more trees and expanding our green corridors programme.

8.2 The Council is currently consulting with the public on updating the Brent Climate & Ecological Emergency Strategy (2021-2030) for the remaining period from 2027 -2030. The strategy update will include a detailed programme for delivery, aligned to the commitments above, for the term of this Council Plan.

9.0 Communication Considerations

9.1 It's important that we're transparent and open with residents about the progress we're making to deliver the Council Plan. To achieve this, a comprehensive programme of story-led communications will be delivered to demonstrate the progress, outcomes and impact being made against our priorities and focus areas. The Delivery Plan will provide a strong starting point for these communications, helping us to keep residents informed about the things that are most meaningful to them. We will be open about the progress we're making, challenges we're facing and the opportunities that we are seizing. This approach will include ongoing regular stories, digital content and targeted campaign activity, quarterly 'You Said, We Did' updates led by Lead Cabinet Members, and annual progress summaries.

Report sign off:

Minesh Patel

Corporate Director of Finance and Resources

Legal considerations provided by:

Biancia Robinson, Principal Lawyer, Constitution, Governance and Finance

Finance considerations provided by:

Amanda Healy, Deputy Director Investment and Infrastructure

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Believe in Brent

Council Plan 2026 - 2030



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Councillor Muhammed Butt
Leader of Brent Council

Councillor Gwen Grahl
Deputy Leader of Brent Council

Brent is a borough with enormous strengths. It is home to diverse and ambitious communities, thriving businesses, fantastic parks, vibrant high streets, and one of the most recognisable sporting landmarks in the world. It's a place with a strong identity, a rich history and so much untapped potential. That's why we believe Brent's best days are still ahead of us.

That belief must translate into changes that people can see and feel in their everyday lives. This Council Plan sets out what we want to deliver over the next four years, and the standard by which we should be judged. It will shape the decisions we take, the way we use the council's resources and the work council officers carry out every day.

We want to be honest about the context in which this Plan will be delivered: Brent has huge opportunities, but significant challenges too. Many families are struggling with the cost of living, and affordable housing is increasingly out of reach. Demand for council services is increasing while our resources to deliver them are getting tighter. There are stark differences in health

outcomes and life chances across the different parts of Brent. Our changing climate is creating new challenges and will shape the borough for generations to come. These are some of the defining challenges of our time, and they demand sustained and urgent action from us all.

As well as facing into these challenges, we want this Plan to say something about how we can help people live better lives. Health, culture, sport and play are central to that ambition: they are part of the foundation of a good life, pride in our place and strong communities.

Brent has every reason to be bold about this. We are the home of the national football stadium. We have high-quality parks, green spaces and community organisations, and a proud sporting tradition that stretches well beyond the arch of Wembley. We have real opportunities ahead to transform our existing leisure facilities, invest in our parks and playgrounds, and bring forward new amenities, including a new outdoor lido for the borough.

For us, that is part of putting belief back into the borough. People should be able to look around their neighbourhood and see that things are getting better. A young person growing up in Brent should see opportunities ahead of them. Families going through a difficult period should know their circumstances today do not have to define their future. Good health, security and opportunity should not depend on your postcode or how much money is in your pocket.

As we deliver this Plan, the critical questions we will return to will be: are we making Brent cleaner, safer, healthier and more resilient to a changing climate? **And are we making Brent a better place, helping people build better lives, and creating a better Council that delivers for them?** If we're focused on these things, we can build on everything that makes Brent a place to be proud of. There's still lots to do, but we believe Brent's best days are yet to come.



Kim Wright
Chief Executive of Brent Council

Like councils across the country, Brent is facing significant financial pressures. The challenges our residents face are becoming more complex, expectations from our services continue to grow, and we must continue to make every pound count.

Behind all of this are real people and real lives. More residents are coming to us for support because they are dealing with the impact of rising living costs, housing insecurity, poor health and other challenges that often overlap. The reality is that people's lives do not fit neatly into organisational structures. Someone experiencing poor mental health may also be struggling with debt or housing costs. A family seeking housing support may also need help with childcare or special educational needs.

That is why our response cannot simply be to keep doing the same. We need to work differently.

We are building a council that is both more modern and more human. A council that makes the best use of technology, focuses relentlessly on what matters most, and works across organisational boundaries to provide more joined-up support. Just as importantly, we are strengthening our partnerships with the voluntary and community sector, the NHS, the Metropolitan Police, schools and businesses because the best outcomes for residents are achieved when we work together.

This Council Plan sets out the next chapter for Brent. It reflects what we have learned, the ambitions we have for our borough, and the commitments we are making to residents over the next four years.

The priorities set out here are deliberately focused on the things that matter most to our communities. They will guide our decisions, shape our investments and help us deliver meaningful improvements to people's everyday lives. It is a commitment to our residents, our communities and our partners about the kind of borough we want Brent to be and the role we will play in making that happen.

But this Plan is about more than what we will do. It is about *how* we will do it.

The challenges ahead are significant, but so too are Brent's strengths. We are one of the most diverse, dynamic and resilient places in the country, with ambitious communities, dedicated Council staff and strong partnerships. By working together, focusing on what matters most, staying bold and curious and remaining relentless in our pursuit of better outcomes, we can meet those challenges head on.

Over the next four years, we will continue to listen, learn and adapt. We will be ambitious for our residents, courageous in how we lead change, and focused on delivering real results. Above all, we will be a council that people can trust to stand alongside them, champion their aspirations and create opportunities for everyone to thrive in Brent, making it an even better place to live, work, study and visit.

We believe in Brent

A Brent that is a great place to live, work, visit, study, do business and raise a family.

A Brent that is safe, clean and green.

Where people have a good, affordable place to call home.

Where every young person can succeed.

Where people live healthy, active and independent lives.

Where we're open for business and connected to London and the world.

Where differences are celebrated and communities come together.

Where innovation and technology make life better.

Where everything we do is for our communities and residents.

A Brent to celebrate.

A Brent to believe in.

A Brent to be proud of.



About this Council Plan

This Council Plan sets out our priorities for the next four years. These priorities will guide the decisions we make, help us focus our resources and shape the work we do to deliver for residents.



Investing in the future of Brent

Over the life of this Council Plan, and the years beyond, we'll be working hard to invest in major infrastructure and regeneration projects to benefit Brent's residents, businesses and communities.

Our new Local Plan will sit alongside the Council Plan and help us decide where new homes, jobs, shops and community facilities should be built, how neighbourhoods should grow, and which green spaces, heritage assets and local landmarks should be protected.

Here are some examples of the infrastructure and regeneration projects we're supporting over the coming years with our partners.

- Continuing our ambitious programme of housebuilding to build on the delivery of 20,000 new homes over the past decade.
- Old Oak and Park Royal development, one of the largest regeneration projects in London, which will deliver 25,000 new homes and 65,000 new jobs.
- South Kilburn estate regeneration, including at least 2,400 new homes, new health and education facilities, improved greenspace and retail facilities.
- Development at Staples Corner, including new business premises, 3,000 new homes, improved greenspace and new infrastructure.
- Bridge Park Leisure Centre redevelopment, which will also deliver 1,300 new homes, an adult education centre and community and green spaces.
- Working with partners to support the delivery of major public transport projects, including working with Transport for London and other London councils to secure a new West London Orbital Line (WLO), and an upgrade and extension of the Bakerloo Line.

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Challenges



A lack of affordable homes and homelessness

170+ households approach the council as homeless every week.

2,550+ households live in temporary accommodation, including around 4,000 children.

£30m+ spent by the council on temporary accommodation every year.

Brent is the **2nd least affordable** place to live in England.



Poverty and the cost of living

Around 1 in 7 residents are finding it difficult or very difficult to cope with the cost of living.

42% of children live in poverty after housing costs.

29% of Brent's neighbourhoods are among the 20% most deprived in England.

1 in 3 working-age adults were not in work at the 2021 Census.



Health inequalities

7.3 years - the gap in male life expectancy linked to deprivation in Brent, compared with 3.3 years for women.

Almost 1 in 4 Year 6 pupils live with obesity.

Nearly half of residents want to increase the amount of exercise they do (45%).



Keeping our neighbourhoods safe

32% of residents say tackling crime and antisocial behaviour is their top priority.

38% want the council and its partners to prioritise investment in making neighbourhoods safer.

30.6 antisocial behaviour incidents per 1,000 residents, compared with 27.1 across London.

2nd highest in London for hospital admissions related to violent crime, at 57.2 per 100,000 residents.



Growing demand for our services

Around **4,300** adults with no social care support in the previous year were assessed - 80% more than the London average of 2,400.

Over 20,000 children have Special Educational Needs and/or Disabilities (SEND).

4,452 children have an Education, Health and Care Plan, a 10% increase compared to last year.



Financial pressure on councils

£10m in savings needed by the Council in 2026/27.

£7bn projected funding gap for councils across England by 2028/29.

£5.2bn collective budget shortfall facing London councils over the next four years.

What Brent Council does for you

Whether you live, work, study or do business in Brent, or are visiting, you are likely to use council services.

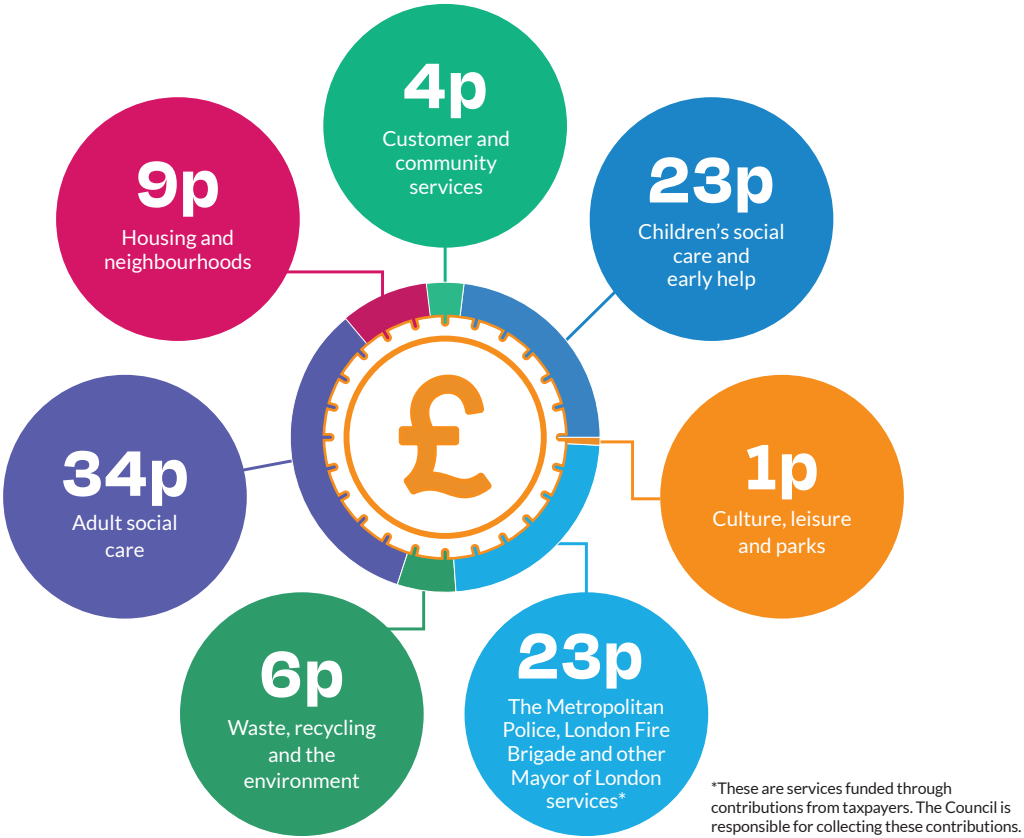
Take a look below to see some of the different services we provide

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 Adult social care	 Children's social care and early help	 Housing	 Homelessness support	 Education and schools	 Community safety
 Responding to anti-social behaviour	 Supporting local businesses for economic growth	 Community engagement	 Waste collection and recycling	 Registration of births and deaths	
 Marriage and citizenship ceremonies	 Environmental issues and climate action	 Council tax and business rates	 Elections	 Benefits and financial advice	
 Libraries, culture and heritage	 Parking, roads and transport	 Parks and green spaces	 Leisure	 Public health	 Neighbourhood planning and building control

Where we spend most of our money

Like most councils in England, most of our money is spent on adult social care and children's social care and early help. The diagram below shows how every pound we spend has been allocated across Council services in the 2026/27 budget.



For adult social care, this includes short-term help and longer-term support for people with more complex needs. We provide support with independent living, including transport, housing and care for residents who are finding it difficult to manage at home.

We are committed to providing the best start in life for our children and young people. Our services for Brent's

children and young people include, but aren't limited to, overseeing community schools and ensuring access to high-quality education, support for children in care and foster families, youth offending services, and support for children and young people with special educational needs and disabilities.

Working with others to deliver services

To make sure we're delivering the services our communities need, we work with partners like the NHS, Metropolitan Police, London Fire Brigade and other government agencies, as well as with local voluntary organisations, community groups and businesses. We're also committed to supporting residents to take action in their local areas.

We always want to hear from our communities to help us shape services around their needs within the resources we have available. Whether that is online through the Have Your Say platform, in person at one of our many events, or putting questions to elected officials at Council meetings, we have a range of opportunities for people who live and work in Brent to be involved in decision making.

Priority 1

A borough to be proud of

Page 33 We want Brent to be the best place to live, work and build a future, with neighbourhoods that are safe, welcoming and vibrant. We want it to be a place that people are proud of and celebrate.

We will work with residents, communities and businesses to invest in our homes, town centres, streets and green spaces, so people of all ages have places and spaces where they can live good lives.

Our focus areas

To see these ambitions come to life, we'll focus on three key areas:

- A good place to call home
- Thriving town centres and high streets
- Cleaner, greener, safer neighbourhoods



A good place to call home

This means:

- We will do everything possible within our means to end homelessness in Brent.
- We will help everyone in Brent to access a safe, secure, quality and affordable home that meets their needs and supports them to live a good life.
- More people are supported to stay in their homes, because early help prevents problems from escalating and reduces the risk of homelessness.
- People experiencing homelessness are supported into stable accommodation and given the right support to regain independence.
- Council tenants live in safe, well-maintained homes and receive reliable and responsive services that are focused on their needs.
- Private renters live in good quality homes, understand their rights and are protected from unlawful and unfair treatment.

To deliver this we will:

- Work with partners and across services to help people stay in their homes, including by providing access to the early advice and support they need.
- Increase access to affordable and suitable homes, through new supply and better use of existing housing.
- Explore making homes more resilient to changing climate conditions, including hotter, drier summers and colder, wetter winters.
- Reduce the need for, cost of, and time spent in temporary accommodation, by helping more people move into stable homes.
- Improve the quality, safety and maintenance of council homes, and act as a responsible and reliable landlord to our tenants.
- Work with landlords and housing providers, and act where needed, to improve housing conditions in the private rented sector.
- Launch a Housing Compact between the Council and social housing providers that sets out how we'll work together to address the housing crisis and deliver better outcomes for residents.

Thriving town centres and high streets

This means:

- Residents, visitors and business owners experience high streets and town centres that are safe, clean, welcoming, green and well-maintained places to visit, spend time and do business.
- Residents have easy access to a diverse mix of essential services, independent businesses, culture and leisure opportunities close to where they live, with fewer vacant shops and premises.
- Communities see fewer concentrations of businesses that undermine wellbeing, such as vape shops and gambling arcades.
- Residents feel proud of thriving high streets and town centres that reflect the character, identity and ambitions of their communities, with attractive public and green spaces.
- Local businesses are recognised for the contribution they make to the local economy and supported to thrive, with more businesses choosing to invest in Brent.

To deliver this we will:

- Work with local people and businesses to make Brent's high streets and town centres safer, cleaner, greener and more attractive.
- Continue to take strong action to reduce the concentration of premises that undermine community wellbeing, including vape shops, rogue traders and gambling arcades.
- Continue to invest in and support Brent's small businesses to start, grow and succeed.
- Work to secure local control over income from the new local visitor levy, so that we can invest in Brent and maximise benefits for local businesses and residents.
- Develop a new Town Centres Strategy, that sets out how we'll invest in town centres and high streets, and work directly with businesses and communities to identify opportunities to improve them.
- Embed culture and creativity into our high streets and town centres through community-led events, public art and creative use of spaces.
- Review parking arrangements across the borough to make sure they remain fit for purpose and work well for everyone.
- Work to make sure our businesses benefit from Brent being home to Wembley Stadium and hosting major national and international events such as UEFA EURO 2028.



Cleaner, greener, safer neighbourhoods

This means:

- Residents take pride in their neighbourhoods, feel a strong sense of belonging, and have opportunities to shape and improve the places they call home.
- Residents enjoy streets and public spaces that are safe, clean, green, vibrant and welcoming, and designed around how people live, move and spend time.
- Everyone feels safe and secure where they live, and as they go about their day-to-day activities, because crime and violence are tackled effectively by the Police working collaboratively with the Council and other partners.
- People can choose from a range of transport modes to get around and access the services and amenities they need, including having more opportunities to walk, wheel and cycle.
- People can travel around Brent easily on safe, well-maintained roads and pavements.
- Everyone can access high-quality parks, open spaces and tree-lined streets across the borough, which help to address the impacts of climate change and support a more resilient Brent.

Air quality is improved across the borough, and action is taken in hotspots where pollution is at its worst.



To deliver this we will:

- Work with partners, including the Metropolitan Police, London Fire Brigade, voluntary sector and others to tackle violent crime and strengthen safety in our communities.
- Develop and deliver our new Community Safety Strategy with key partners.
- Install emergency bleed kits in key locations across the borough and continue working with partners on knife amnesty and tackling knife crime.
- Work in partnership with the Police to identify options to strengthen neighbourhood policing.
- Invest in our roads and pavements, including repairing potholes and making our pavements safe.
- Build on our Don't Mess with Brent campaign to tackle fly-tipping and keep streets clean and well-maintained.
- Work with communities to support local initiatives that improve streets and public spaces, such as community skips and clean up days.
- Continue to take action to support our communities to adapt to and mitigate the impacts of climate change.
- Work with communities to plant more trees and create greener spaces across the borough.
- Continue our work to introduce more green corridors throughout the borough, to link active travel routes and green spaces.
- Continue to monitor and report on our air quality status to drive progress towards cleaner air across the borough.
- Do everything possible within our means to try to achieve net zero for our corporate estate and operations by 2030.
- Work with partners and continue to invest to ensure that residents have access to a range of transport options, including more options to use public transport, walk, wheel and cycle.
- Develop new, and expand existing, School Streets where they can improve safety and reduce congestion and pollution around schools.

Priority 2

A borough where people thrive

We want Brent to be a place where everyone has the opportunity to build and live a good life, with access to the support, skills and opportunities they need to succeed. By supporting residents of all ages to learn, work, stay healthy and live independently, we will help people achieve their ambitions and build secure futures. We will focus more on intervening early where we can, providing the right support at the right time to prevent needs from escalating as well as helping people navigate cost of living pressures.

Our focus areas

To see these ambitions come to life, we'll focus on two key areas:

- Tackling the cost of living by unlocking potential
- Healthy, active communities

Tackling the cost of living by unlocking potential

This means:

- Residents can access the advice and support they need to manage the cost of living early, to prevent financial difficulties from becoming a crisis.
- Partners across Brent work together to reduce poverty and inequality and support residents to live secure and independent lives.
- Doing all we can to alleviate poverty for children and young people, by putting support in place to help them reach their full potential.
- Everyone can overcome barriers to opportunity, with no one held back by disadvantage, or prevented from reaching their full potential.
- Every child and young person across Brent gets the best start in life and has the confidence, skills and opportunities they need to reach their potential.
- Children and families in Brent can continue to access high-quality schools.
- More residents have the skills, qualifications and opportunities they need to secure good jobs and progress in their careers.
- Brent has a thriving, inclusive economy where businesses can access the skilled local workforce they need to grow and succeed.

To deliver this we will:

- Provide targeted support for residents facing financial hardship through programmes including the Holiday Activities and Food Programme, Resident Support Fund – Crisis Payments, and Council Tax Support Scheme.
- Provide residents with easy access to cost of living and financial and debt management advice and support through neighbourhood-based services such as Brent Hubs, the New Horizons Centre, Best Start Family Hubs and libraries.
- Support residents to identify, access and navigate financial support they may be entitled to, including pensions and the Personal Independence Payment (PIP).
- Introduce an Education Maintenance Allowance to help remove barriers to education and opportunity.
- Launch a School Uniform Grant and encourage more school uniform Swap Shops to help families manage the cost of school essentials.
- Develop a new Inclusive Growth Strategy to raise skill levels, improve routes into good quality employment, support business and attract investment into the borough, to make sure that growth benefits Brent's communities.
- Continue our work to invest in and support schools so they can support children and young people to reach their full potential.
- Work with schools, colleges, universities and employers to help residents develop the skills they need for future opportunities.
- Create more opportunities for residents to access training, apprenticeships and employment support.
- Use council-owned spaces such as libraries and Best Start Family Hubs to help residents access support, develop new skills and take part in cultural and community life.



Healthy, active communities

This means:

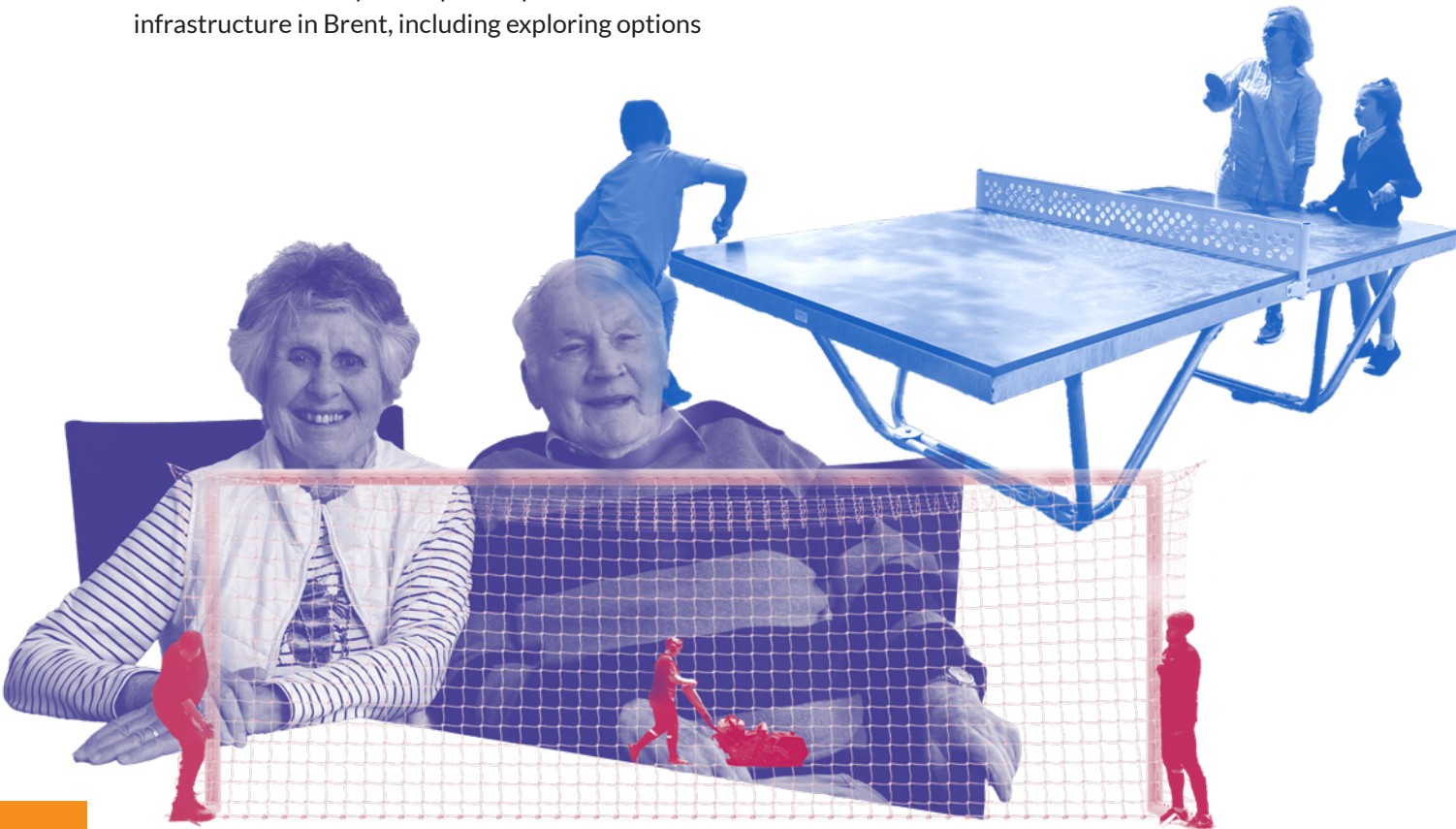
- Residents can access the health, care and wellbeing support they need at the right time, helping them stay healthy, independent and connected to their communities.
- Brent is a borough where everyone can be active, play and lead a healthier life.
- Everyone can access affordable opportunities to be active, regardless of their age, background or income.
- Every resident can enjoy parks, playgrounds and leisure facilities close to home that are safe, welcoming and vibrant spaces to play, exercise and spend time outdoors.
- People can walk and cycle safely and easily across the borough, with more opportunities to choose healthier and greener ways to travel.

To deliver this we will:

- Work with communities where health outcomes are poorer, including through our Public Health services, the Brent Health Matters and Brent Active Together programmes, to reduce health inequalities and make it easier to get the right support early, so people can stay well and independent for longer.
- Invest in our parks and playgrounds to create better spaces for residents to be active and spend time outdoors.
- Continue to find ways to improve sport and leisure infrastructure in Brent, including exploring options for a lido in the borough, renovating existing sites and looking at ways to ensure developers contribute to improving open space.
- Improve access to affordable physical activity opportunities, particularly for children and young people.
- Build on the opportunities created by Brent being home to Wembley Stadium to enable more residents to take part in sport, leisure and recreation, and ensure that hosting UEFA EURO 2028 leaves a lasting legacy of better facilities, infrastructure and opportunities for our communities.

Work with partners to encourage more residents to be active, improve their health and wellbeing and live independent lives.

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Priority 3

A council that delivers for you

We are committed to delivering the best possible outcomes for the residents and communities we serve – and delivering the things we’ve said we’ll do in this Plan.

To make sure we deliver our ambitions within the financial and organisational constraints we face, we need to work differently. Over the next four years, we’ll be working hard to make changes to how we do things *with* and *for* our residents.

While much of this priority is about how we work as an organisation, it’s also about how we work with others. Every day, community groups, voluntary organisations, businesses and individuals across Brent work tirelessly to make a difference in their communities. We want to support them, work alongside them and build on what they do to achieve the best possible outcomes for our communities.

We will:

- Put residents and customers first, **organising our work around their needs and outcomes**, instead of how our departments are set up, so that it is easier for residents to access and use the services they need.
- Take early, preventative action** to prevent people from reaching crisis point and reduce demand for services, especially homelessness and social care services.
- Ensure financial sustainability** so that we can continue to afford to deliver the services that matter to residents.
- Work in neighbourhoods** and in a joined-up way with partners to deliver services and support in the places people live and spend time.
- Empower our communities** to shape a better Brent, by involving them in decision-making, enabling local action and working with them to improve services.
- Empower our staff to question, innovate and lead** by developing the leadership, culture, workforce and skills that we need, so that we continue to find ways to do things differently.
- Use data, insight and digital tools** so that our decisions are evidence-based and we can deliver services more efficiently.
- Lead by example** by using the Council’s spending, jobs, buildings, contracts and relationships to deliver benefits for the local economy by supporting local people, community and voluntary organisations and businesses.

Our work to change how we’re doing things will mean that you:

- Find it easier to get the support you need, because our services are simpler, more responsive and designed around what matters to you.
- Only need to tell us your story once, because our council teams and partners will work in a more joined-up way around your needs, rather than you having to navigate separate services.
- Will see more of the council’s time and resources focused on the things that matter the most to residents.
- Benefit from a council that is better able to manage its resources and respond to future challenges, because we make clearer choices about how we spend our money, and focus on preventing problems and managing demand.
- Receive better services from a council that continues to improve, because we invest in the right leadership, skills, technology, data and culture to develop new, innovative and better ways of working.
- Are more confident that the council is delivering on its commitments, because we have clearer plans, measures and governance arrangements in place to ensure we’re accountable for the priorities that matter to residents.
- See us supporting and working more closely with public services, businesses, voluntary and community organisations and other partners to improve outcomes for Brent’s communities.
- Hear more regularly about the work we’re doing and have more opportunities to share your views, get involved and help shape decisions about what happens in your local area.
- Have more opportunities to work with us to improve how we’re delivering services, and have our support to take action in your local area to address challenges and make the most of opportunities.

Our values

As well as being guided by our commitment to delivering good outcomes for residents, our organisational values will guide everything we do.

COLLABORATE PROACTIVELY

This means collaborating and working together to create change and build a stronger, more inclusive Brent.

LEAD INCLUSIVELY

This means celebrating diversity and embracing fairness and respect, because every voice matters at Brent.

EMBRACE CHANGE

This means being flexible and agile, taking bold steps towards our ambitions and building resilience with every change we make.

BE BOLD AND CURIOUS

This means being creative, curious and bold, breaking barriers and embracing innovation to find better ways of delivering for residents.

CELEBRATE AND SHARE OUR SUCCESS

This means celebrating our strengths and achievements, and the pride that we have in Brent, so that we can unlock greatness and reach new heights together.



Turning ambition into action

The Council Plan sets out what we want to achieve over the next four years. Delivering on our ambitions will require focus, accountability and a commitment to working together and doing things differently. This section explains how we will turn our ambitions into action, how we will measure progress, and how we will keep residents informed about the progress we're making.

How we'll deliver on this plan

This Plan will guide the council's decisions, investment and day-to-day activity over the next four years. Each priority is supported by a set of outcomes and actions that will help us focus our efforts on the things that matter most to residents.

We'll develop an annual Delivery Plan that will sit alongside the Council Plan, which will set out in more detail what exactly we're doing to deliver on the promises we've made in the Council Plan.

Delivering our ambitions will require us to work closely with our communities, partners and businesses, making the most of the strengths that already exist across Brent.

Monitoring our progress and keeping residents informed

We will be accountable for delivering this Plan and ensure that progress is regularly reviewed by councillors and senior leaders.

We will use a range of performance measures to track our progress against the priorities in this Plan and to understand the impact our work is having. We will report regularly to Cabinet and via our communications channels on the outcomes we're achieving and difference our work is making.

Regular reporting on our progress will help us to celebrate successes, identify where more action is needed and continuously improve the services we provide.

We will continue to listen to feedback and use a range of channels to keep residents informed and involved.

Spending every pound with purpose

Like all councils across the country, we face increasing demand for services alongside significant financial pressures. This means we cannot do everything at once and must make careful choices about where we focus our resources. Through the annual budget setting process, we will prioritise spending on the services residents rely on most, invest in prevention where it can reduce future demand, and target resources where they will have the greatest impact on people's lives. Our decisions will be guided by the priorities set out in this Council Plan, so that every pound we spend, every decision we make and every service we deliver is aligned to the outcomes that matter most to residents.





How we developed the Council Plan Engagement and Evidence Report

About this report

This guide explains what's in this Engagement and Evidence Report, and how to navigate through it.

The evidence and what we've heard

This report sets out the engagement that took place to inform the Council Plan. It sets out the key things we heard from residents, Members, staff and partners, and the other evidence sources we drew on to develop the Council Plan.

How we developed the Council Plan

Page three of this report sets out the process that we followed to develop the Council Plan. It shows how we used evidence and information to reach the final structure and content of the Council Plan and explains the difference between Council Plan priorities and focus areas.

How the feedback and evidence shaped the Council Plan

Throughout this report we've explained how we used what we heard and the information we gathered to inform the Council Plan's priorities and focus areas. You can find this information inside purple boxes like the one shown on the right.

How this shaped the Plan

You can find more detail on each page inside purple boxes like this one.



How the Council Plan was developed

What informed the Council Plan: the evidence

**Resident views**

- Resident Attitudes Survey
- Council Plan survey
- Existing resident feedback and community insight

**Political priorities**

- Analysis of party manifestos
- Member engagement

**Staff and service insight**

- Staff surveys
- Discussions with key services

**Partners and stakeholders**

- Conversations with our strategic partners

**Other data and local evidence**

- Challenges and Opportunities
- Brent Wellbeing Index
- Indices of Deprivation 2025
- Poverty and inequality data
- Census 2021

Bringing it all together

- We brought together everything residents, Members, staff, partners and key datasets told us.
- We then identified the biggest themes, opportunities, needs and gaps.
- This helped us to understand where we could have the greatest impact and make the most meaningful difference for residents and communities.
- We balanced this against the Council’s statutory responsibilities, financial position, and available resources, because we can’t include everything people told us in the Council Plan.
- We thought about the things that we will need to do in partnership with others – because we can’t do everything on our own.
- We turned this evidence and analysis into a focused set of priorities and activities to test with Members.



Resident Attitudes Survey (RAS) – Key Results

Every four – five years the Council carries out a Resident Attitudes Survey (RAS), with an independent research partner, DJS Research. The RAS provides a snapshot of residents' views on their priorities, their neighbourhood and the service the Council provides. The survey took place between 15 May – 30 July 2026, with a total of **2,207 people** interviewed. The RAS involved face-to-face interviews – 1,846 at the doorstep and 361 in the street. There were approximately 100 interviews carried out in each of Brent's 22 wards, with targets for characteristics like age, gender, disability, ethnicity and working status to reflect the demographics of Brent's overall population. We acknowledge that this is only one set of data, captured at a particular point in time, and needs to be read alongside other insights and sources of data.

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Satisfaction with local area

90% ↑

2021: 81%
LGA: 72%



Satisfaction with Council

77% ↑

2021: 72%
LGA: 51%



Value for money

56% ↑

2021: 51%
LGA: 38%



Council acts on concerns

71%

2021: N/A
LGA: 53%



Council keeps residents informed

80% ↑

2021: 64%
LGA: 49%



Experiencing some form of financial difficulty

38%

2021: N/A
LGA: N/A



Struggling with the Cost of living

15%

2021: N/A
LGA: N/A

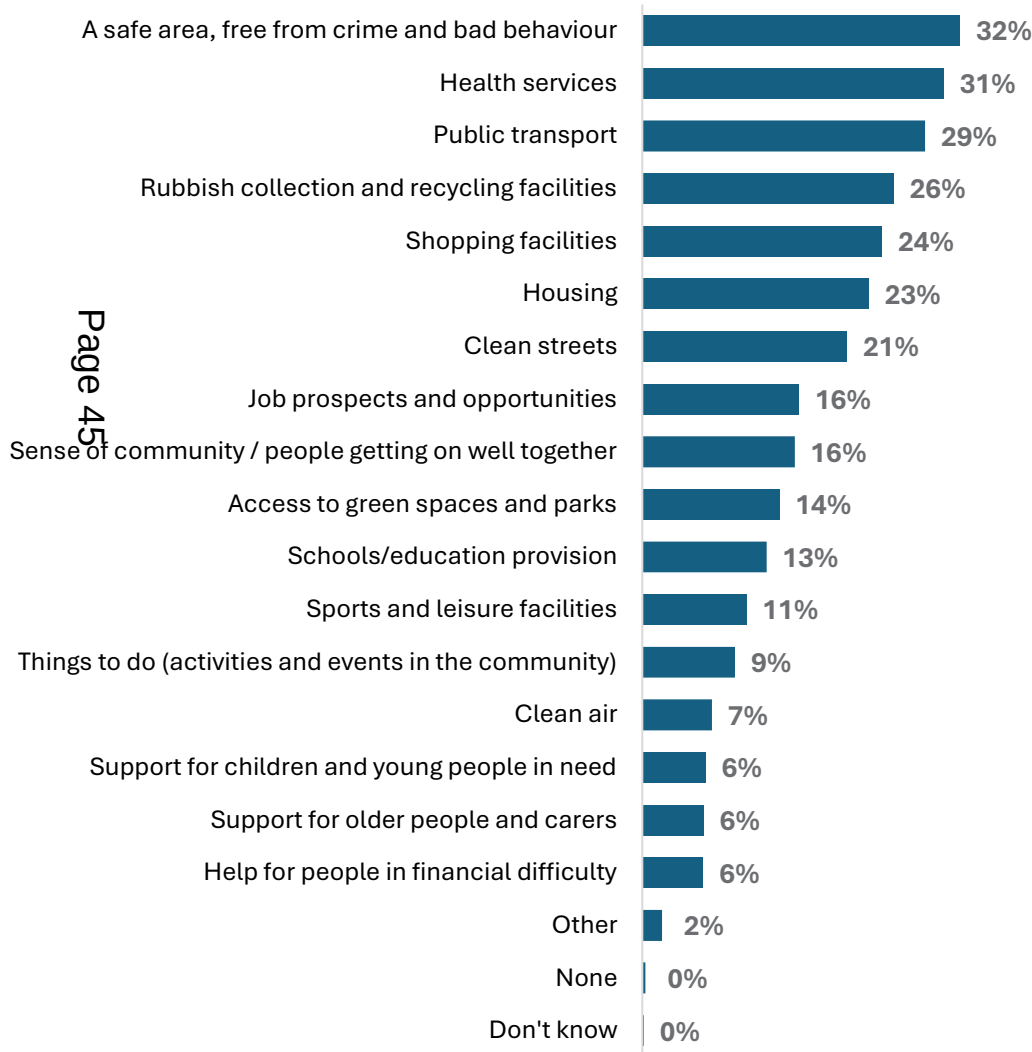


How this shaped the Plan

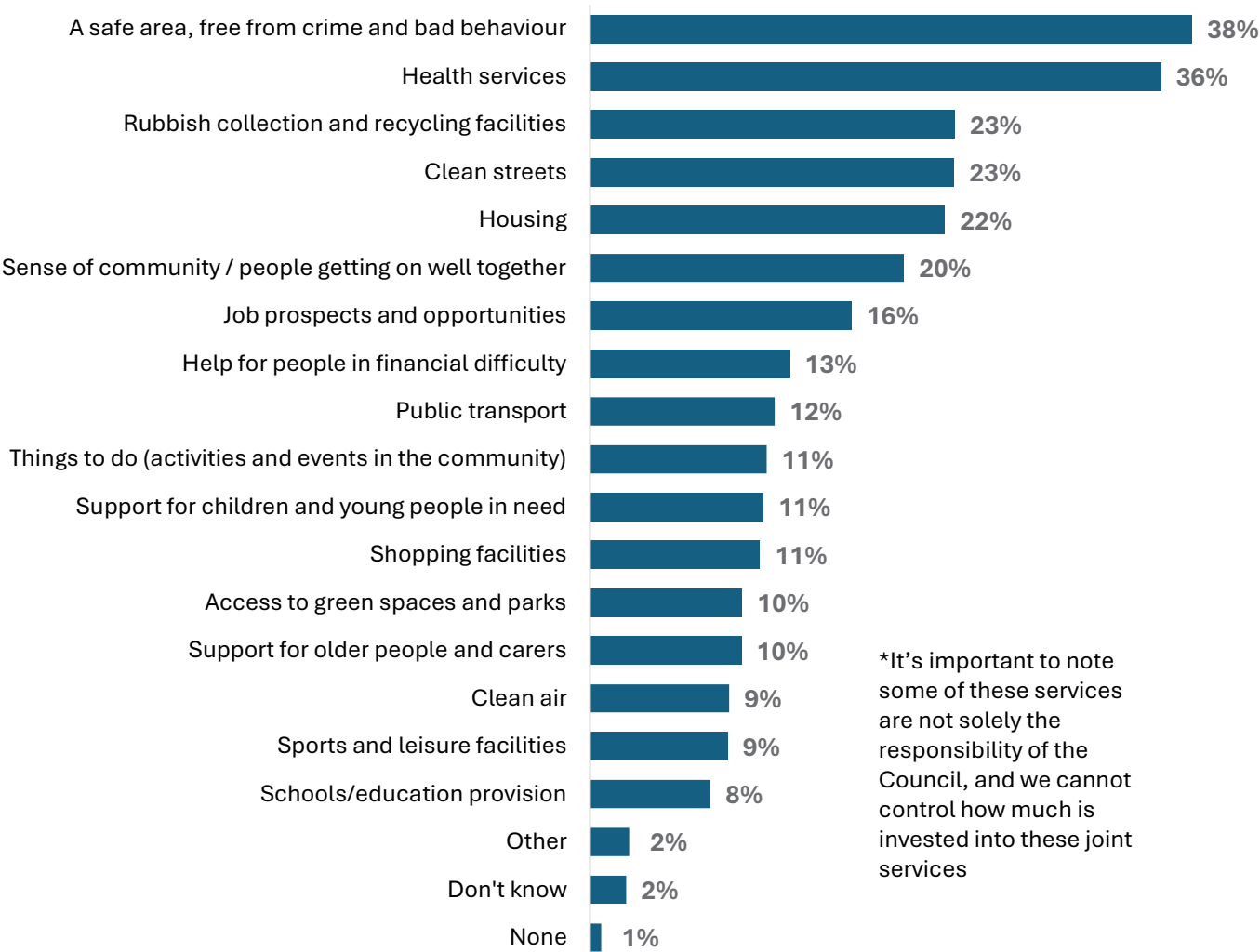
RAS data helped us to make sure that the Council Plan is focused on the things that matter most to residents. The data points strongly to residents' concerns about safety and struggles with the cost of living - both of which are addressed through the Council Plan's focus areas, **Cleaner, greener, safer neighbourhoods** and **Tackling the cost of living by unlocking potential**.

RAS – Things most valued by residents

Things most valued by residents

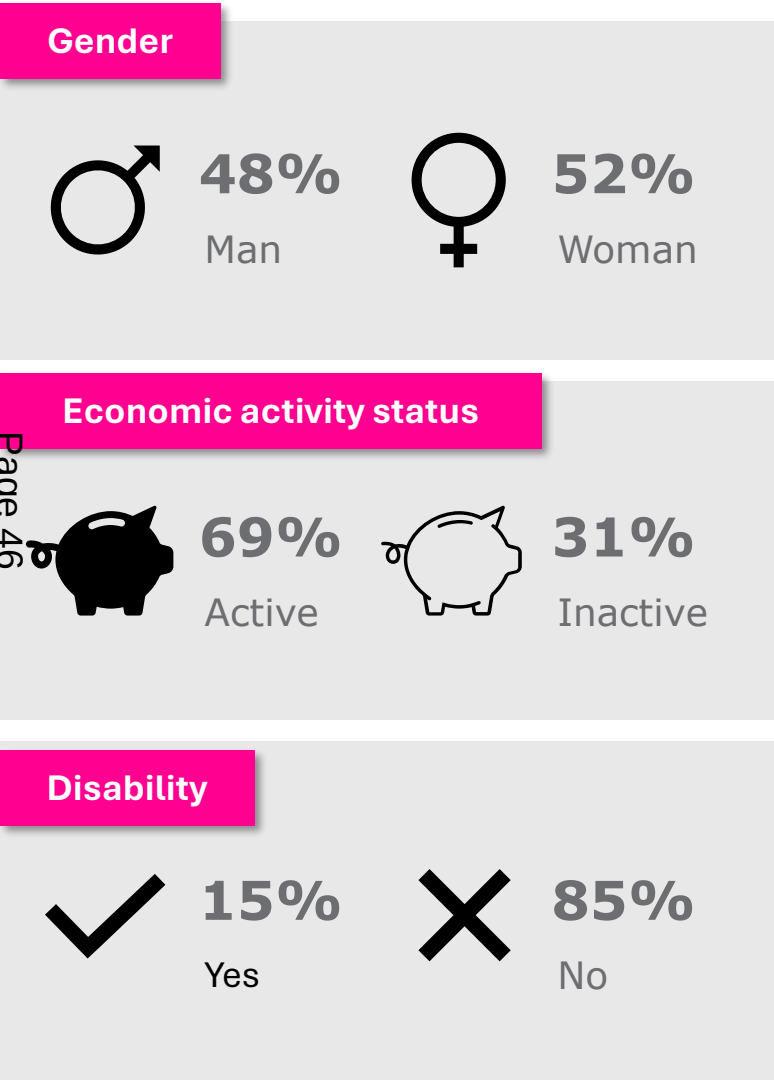
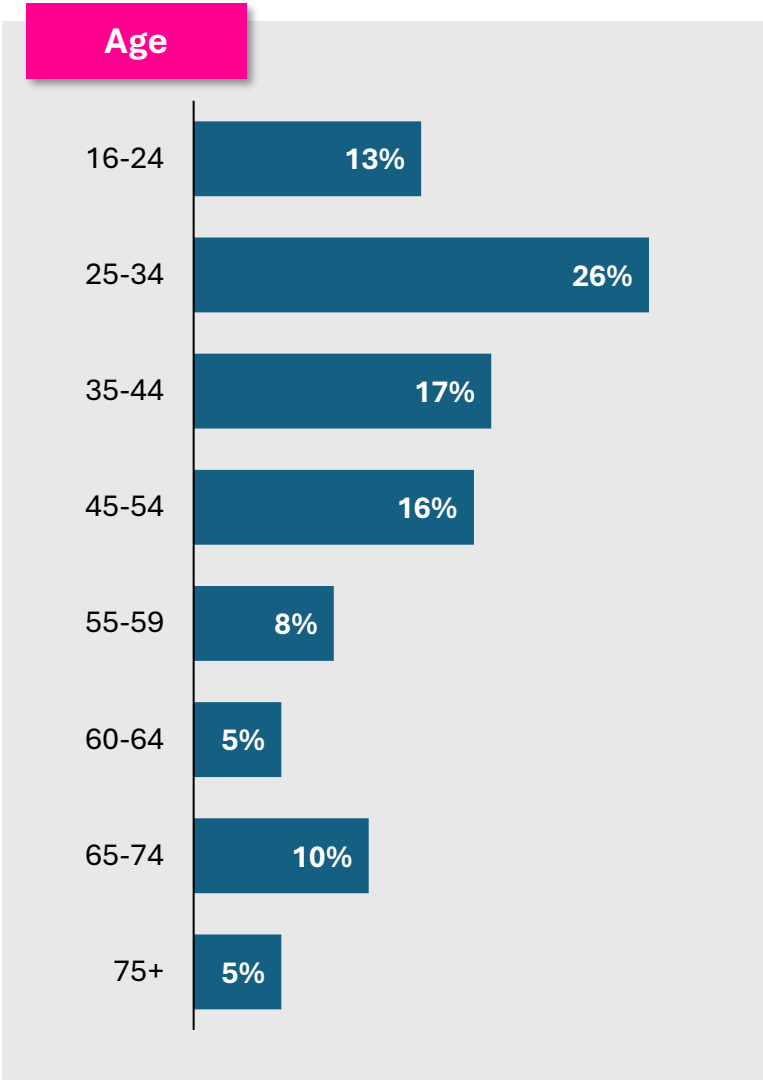
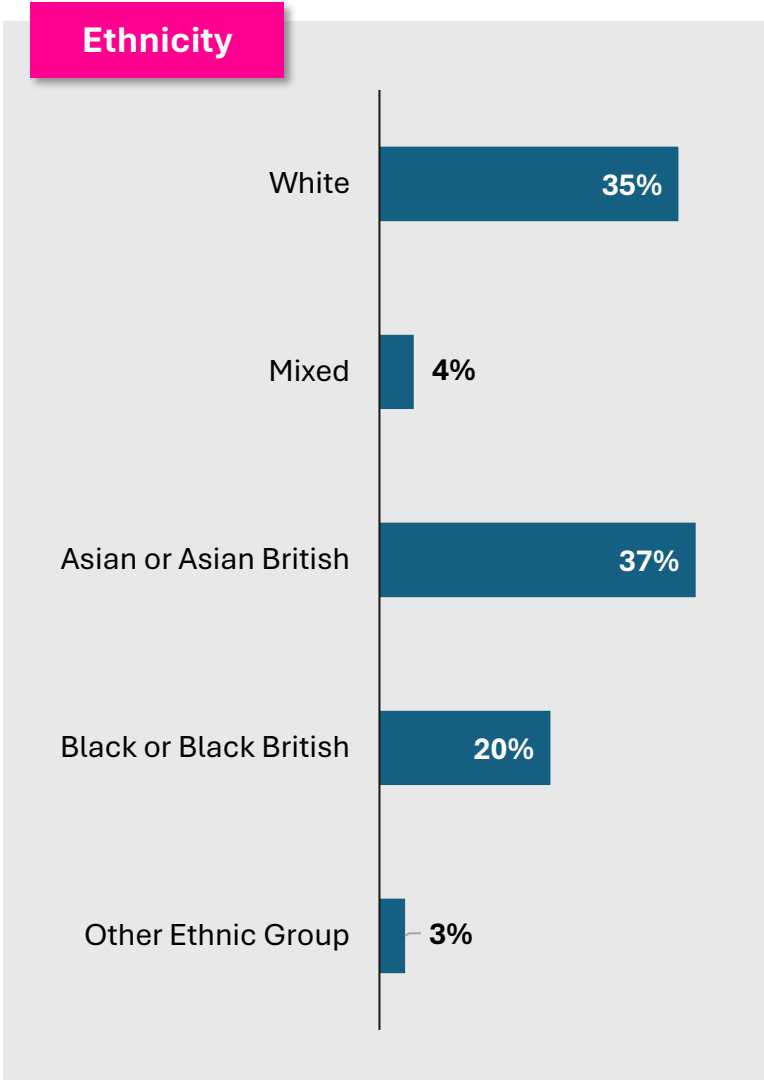


Where Council money should be spent *



*It's important to note some of these services are not solely the responsibility of the Council, and we cannot control how much is invested into these joint services

RAS respondent profile



Figures may not sum to 100% due to refusals (not charted) or rounding. Weighted figures shown.

Help shape Brent's next Council Plan survey

During July and August 2026, we asked residents via a short online survey to tell us what makes Brent a great place to live, and what should be improved. We received **752 responses from residents, business owners and community and voluntary sector organisations**. A summary of the survey responses is on the other side of this page.

To make sure we heard from as many people as possible, we promoted the survey via our digital channels, at community events and to key partners, including voluntary and community organisations and faith groups. More detail on how we did this is included on slide 9.

Who did we hear from?

- Most respondents were aged 45-54 (20.3%) and 65+ (19.1%)
- 42.6% responses were from people working full time, 17.4% of respondents are retired
- 6.3% responses were from business owners/representatives
- 7.5% responses were from voluntary and community sector organisations

How this shaped the Plan

In response to this feedback, the Council Plan makes a number of commitments around improving the safety, cleanliness and attractiveness of public spaces, and improving town centres and high streets. It also commits to providing residents with cost of living support, and support to access good employment, skills and training opportunities. Improving the service that the Council provides to residents is at the heart of the Council Plan.

What makes Brent a great place to live?

- Our mixed communities and vibrant multicultural character.
- Good transport links, and strong connectivity.
- High streets that are easy to visit.
- Compared to neighbouring boroughs, residents feel Brent is relatively affordable.

What should be improved in Brent over the next four years?

- Local streets to be cleaner, safer and more pleasant to walk along, with less visible drug use, harassment and anti-social behaviour.
- A better mix of shops on high streets, rather than concentrations of betting and vape shops.
- Concerns around overdevelopment – need for a better balance between accommodating new residents and supporting existing communities.
- More help with housing, food banks and employability.
- Local jobs and opportunities should be prioritised for Brent residents.

If Brent could improve just one thing over the next four years, would make the biggest difference to you, your family or your community?

- The condition, safety and attractiveness of local streets and town centres.
- Improved traffic and street management, including safer walking and cycling, fairer parking/event day permit arrangements and better handling of roadworks.
- Faster and more compassionate council support for older and disabled residents, with non-digital options available.
- More community-run indoor and outdoor spaces.

Help shape Brent's next Council Plan survey

Here are some of the things you told us:

Page 48

"We need cleaner streets, free from rubbish."

"Improve our environment, so we can [be] proud to live in Brent..."

"Closing down betting shops and fighting new ones opening."

"Prioritise children and young people. They deserve to feel safe both at school and in their community, receive a good standard of education and have safe places to go after school, at weekends and during holidays."

"Every family should have somewhere safe and healthy to live."

"Invest in leisure facilities, allow young people and all people to enjoy."

"Support local businesses so they are able to open and thrive."



Help shape Brent’s next Council Plan survey – getting communities involved

This page shows the work that we did to make sure that as many residents and communities were aware of the survey and had the opportunity to share their thoughts with us.

Benchmarking – We compared the number of responses to our Council Plan survey with responses received by other local authorities that used the Go Vocal survey platform for their Council Plan engagement in 2025. The number of responses we received compares favourably, indicating strong levels of engagement.

Page 49	Council	Survey respondents
	Brent Council	752
	Royal Borough of Kensington and Chelsea	584
	Wokingham	433
	Reading Borough Council	163

During the consultation period, the Council Plan survey page received **2,523 visits**, indicating strong awareness and interest, even where residents chose not to submit a survey response.

Community Network Promotion

The survey was circulated through established community engagement networks including:

- Faith groups
- Disability networks
- Pensioners groups
- Community and voluntary sector organisations
- Other key stakeholders

Community Outreach Activity

The Council promoted the survey at a number of community events and forums across the borough:

- Summer Streets events in Wembley, Willesden, Kingsbury and Kenton
 - Brent Pensioners Forum
 - One Kilburn Forum
- Brent Health Matters pop-up events
- Free Health Conversations session at Willesden Library

Faith Community Engagement

The survey was promoted through the Brent Multi Faith Forum and shared directly with a range of faith organisations and places of worship including:

- Central Mosque Willesden
- BAPS Shri Swaminarayan Mandir, Neasden
 - Kingsbury Mandir
 - St Gabriel’s Church
- Brazilian Evangelical Church
 - Brahma Kumaris
- Willesden Baptist Church
- Hillside Islamic Cultural Centre
 - Wembley Synagogue
- Brondesbury Park Synagogue
- Makor Hayim Synagogue
- Brent Sikh Centre (Kingsbury)

Community and Voluntary Sector Engagement

The survey was promoted through a variety of community and voluntary sector organisations, including:

- Ashford Place
- Higher Potential
- South Kilburn Trust
 - Divine Purpose
- Brent Indian Association
 - United Borders
- Asian People’s Disability Alliance (APDA)
 - Brent Punjabi Association
 - Connect Stars
- Civil Litigation For All

Member engagement

We began our work to develop the Council Plan by analysing the manifestos of each political group elected to Brent Council. Manifestos reflect political priorities developed through extensive engagement with residents.

We met with Cabinet Members, Political Group Leaders and Councillors throughout the development of the Council Plan to help us to understand what Members hear from the residents and communities they represent and speak to everyday. We continually adapted the Council Plan in response to the feedback we heard.

What we did:

- Confirmed with Members that our manifesto analysis was accurate
- Had multiple conversations with the Leader and Deputy Leader of the Council
- Had a number of conversations with each Political Group Leader
- Had a conversation with each Cabinet member, focused on making sure the Council Plan reflects their area(s) of responsibility
- Had a number of discussions with Cabinet
- Gave all Political Group Leaders the opportunity to come together to discuss and provide feedback on the Council Plan's emerging priorities and focus areas
- Invited Members from all three scrutiny committees to consider the draft Council Plan, ask questions and provide challenge and feedback



How this shaped the Plan

Councillors' insights shaped the structure, priorities and focus areas of the Council Plan at every stage. We listened to and incorporated their feedback, while balancing the needs and priorities of each party.



Staff Insights - survey and discussions

We asked staff for their feedback (via a survey and a number of discussions) about what they hear from residents, partners and communities; what work they think the Council should continue doing; and what changes they think the Council needs to make. The table below sets out some of the key themes we heard.

What feedback do you hear most often about your service from residents, communities, businesses or partners?

- Importance of Council services that are easy to access and understand, and responsive to residents' needs.
- Need for clearer communication and more regular updates.
- Concerns about waiting times and the challenge of navigating multiple different services, especially when dealing with complex issues.
- Concerns about street cleanliness, rubbish collection and safety of roads.
- Challenges accessing affordable housing.
- Challenges with the cost of living.
- Residents value being able to access services locally.
- Positive feedback about helpful staff and support that has made a difference to people's lives.

What work is the Council doing well that should continue for the next four years?

- Maintain strong face-to-face support.
- Help for residents facing challenges such as homelessness and financial hardship.
- Continue to create a cleaner, greener and more sustainable borough, including by investing in tree planting, active travel, recycling and climate action.
- Continue to invest in public spaces, libraries and community facilities.
- Taking strong action to improve housing standards for private renters.
- Making efforts to join up Council services and with partners.
- Improving technology, data and innovative ways of working.

Recognising the constraints we have, what changes should the Council make in the next four years?

- Make Council services simpler, more joined up and easier to access.
- Streamline processes and improve communication between teams to reduce the need for residents to repeat information and navigate multiple services.
- Focus resources on supporting residents who are facing the most significant cost of living and housing pressures.
- Invest in digital services, technology and staff skills to improve efficiency and service quality.
- Continued investment in improving housing and neighbourhoods.

How this shaped the Plan

Staff feedback has largely been reflected in the ***Council that delivers for you*** priority. This priority outlines how we will work as an organisation, and with partners, to deliver meaningful improvements to people's lives. It commits the Council to taking early, preventative action; better joining up Council services and working closely with partners; and using technology and data to improve service delivery.

Feedback from our key partners

We work closely with partners across the public, private and community sectors. Earlier in 2026, we hosted a meeting with key strategic partners to discuss the most critical challenges and opportunities we have in Brent, and that we can work on collectively to improve the lives of Brent residents. Although the Council Plan is focused on the things that Brent Council can deliver as an organisation, incorporating perspectives from other sectors and partners helps to ensure that the Council Plan's priorities reflect local needs, support partnership working and help improve the lives of our communities. Below are lists of the biggest opportunities and challenges facing Brent's residents and communities that our partners identified.

Opportunities to improve things for residents and communities in Brent

Page 52

- Employment and apprenticeship pathways
- More recruitment of local people to local jobs
- Stronger links between education and employment
- Stronger partnership working and communication
- Supporting local and small businesses
- Community wealth building
- Retaining economic value within Brent
- Enhancing Brent's creative and cultural sectors and building on Brent's cultural assets
- Climate adaptation and environmental improvement
- Using AI and innovative technology

Challenges facing Brent's residents and communities

- Youth and general unemployment/work instability
- Young people losing hope and ambition
- Lack of work readiness and experience
- Limited coordination across organisations
- Housing affordability
- Poverty/Deprivation

How this shaped the Plan

Our Council Plan priorities and focus areas reflect the challenges and opportunities that are top of mind for our partners. In particular, there's a strong focus on improving employment, training and skills opportunities for local people, and especially our young people, in our ***Unlocking potential by tackling the cost of living*** focus area. The ***Council that delivers for you*** priority has a strong focus on making sure that the Council continues to work with partners to deliver good outcomes for residents, because we recognise that we can't do everything ourselves.

Challenges

This data is pulled from a range of sources and shows the different challenges Brent and the Council are facing. Footnotes are located on the last page of this report.



A lack of good quality, affordable homes and homelessness

170+ households approach the council as homeless each week¹, with over **2,550** households – including around **4,000** children – living in temporary accommodation¹.

We spend over **£30 million** each year on temporary accommodation for homeless residents².

According to recent data, Brent is the **second least affordable place to live** in England.³



Poverty and the cost of living

Around **42%** of children in Brent are living in poverty after housing costs, compared with a London average of **31%** (without housing costs, the figure falls to 18.5%)⁴.

29% of Brent’s neighbourhoods are among the **20% most deprived** in England⁵.

At the last Census, **1 in 3 working-age adults were not in work**. 6% were seeking work while 28% were economically inactive⁶.



Health Inequalities

The deprivation related gap in life expectancy in Brent is **7.3 years for men** and **3.3 years for women**⁷.

Almost **one in four Year 6 pupils** in Brent are living with obesity (24.7%), **higher than the number in both London** (23.2%) **and England** (22.2%)⁸.



Keeping our neighbourhoods safe

A **safe area, free from crime and anti-social behaviour** was the top priority for **32%** of residents – and **38%** said it’s where they most want the council and its partners to invest⁹.

Anti-social behaviour remains a challenge in Brent, with **30.6 police-recorded incidents per 1,000 residents**, which is **above the London rate of 27.1**¹⁰.

Brent has the second-highest rate of hospital admissions for violent crime in London, at **57.2** per 100,000 people¹¹.



Growing demand for our services

In 2026/27 alone, the council needs to find around **£10m** in savings while protecting the services we’re required to provide by law.

Nearly **4,300** adults received an Adult Social Care assessment in Brent in the last 12 months. This was around **80% higher than the London average** of 2,400 adults¹².

At the end of March 2026, **295 children** were in Brent’s care. The average cost of a residential home placement is **over £7,000 per child per week**¹³



Financial pressure on councils

Councils in England are expected to face a funding gap of **£7.0 billion by 2028/29**¹⁴. This is due to a wide range of factors including demographic growth, inflation, wage growth and new national requirements.

By 2028/29, councils will face **extra cost pressures equivalent to 22%** of their current spending¹⁵. Councils in London face a collective budget shortfall of **£5.2 billion** over the next four years¹⁶.

Opportunities

As well as the challenges presented on the previous page, Brent also has many strengths, which are opportunities for us to build on. Footnotes are located on the last page of this report.



Maintaining the quality of our neighbourhoods

90% of **residents** are satisfied with their local area and **76%** are proud to live in Brent¹⁷.

Building on this strong sense of local pride, up to **£40 million** of long-term Pride in Place investment in Harlesden and St Raphael's creates a major opportunity to revitalise neighbourhoods, improve public and community spaces, and give local people a greater say in shaping their local area.



Using Brent's global profile to create local opportunity

Brent is home to almost **16,000 businesses**, providing jobs, services and opportunities across the borough¹⁸.

Wembley Stadium is built for big moments. It holds **90,000 people**, which makes it the UK's largest stadium and second-largest in Europe.

With non-sporting events crowds **spending more than £4.35 million locally** each time there is an event, visitors create opportunities for local shops, restaurants, hotels and other businesses to grow, invest and create jobs¹⁹.

As London introduces a **visitor levy**, Brent will look to maximise this for the benefit of local communities.



Championing cultural diversity as a great strength

Brent's diversity is one of our greatest strengths.

56% of Brent's residents were born outside the UK – the highest proportion of any local authority in the country²⁰.

85% of residents say Brent is a place where people from different backgrounds get on well together²¹.

Brent's rich mixture of cultures contributes to a vibrant cultural economy, which contributes an estimated **£238 million** annually, supporting jobs, skills, businesses and tourism²².

We will keep building an inclusive Brent where everyone feels that they belong, and a Council that is proudly anti-racist.



Building on residents' satisfaction with council services

Most residents have a positive experience of the council. **77%** are satisfied with the way council runs things and **71%** feel the council responds to residents' concerns²³.

How this shaped the Plan

The opportunities and challenges that are set out above and on the previous page have directly informed the Council Plan's priorities and focus areas. The Council Plan is focused on both supporting residents and communities to manage the impacts of some of the key challenges we're facing in Brent but also responds to the opportunities that there are to improve on the things we're already doing well and to make the most of new and emerging opportunities.

Brent Wellbeing Index

The Brent Wellbeing Index is an interactive data tool that measures how Brent's 22 wards are performing across a wide range of social, environmental and economic outcomes. It focuses on what life is like for Brent's communities, covering areas such as health, safety, education, access to services and community wellbeing.

[Access the full dashboard](#) to find more information.

It is broken down into four key pillars:

Security and Stability: Looks at whether people can meet their essential needs, stay safe, and maintain stability in their day-to-day lives.

Health and Longevity: Assesses whether residents have the foundations for good health and long lives, and where preventable health challenges may exist.

Opportunity and Social Mobility: Assesses whether people have access to education, skills, and opportunities that help them achieve their potential and improve their lives.

Belonging and Trust: Looks at how connected, engaged, and supported communities are, and whether residents trust and contribute to the places where they live.

The next page shows you how Brent's 22 wards measure against the four pillars

How this shaped the Plan

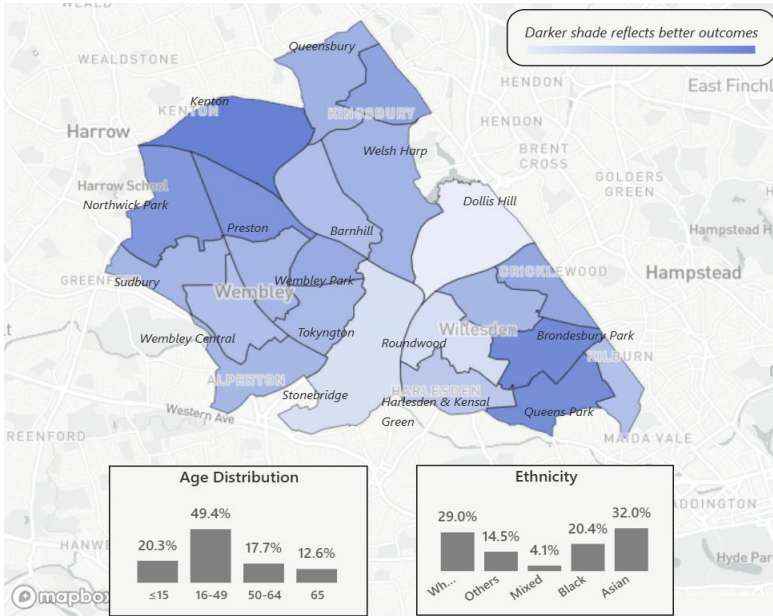
The Index shows us that wellbeing outcomes vary across the borough – particularly in the Security and Stability and Health and Longevity pillars. In response to this, the Council Plan includes a number of commitments to make sure residents can access housing and cost of living support, and good employment, training and skills opportunities. It includes a strong focus on improving health outcomes in the **Healthy and active communities** focus area.

Brent Wellbeing Index Data

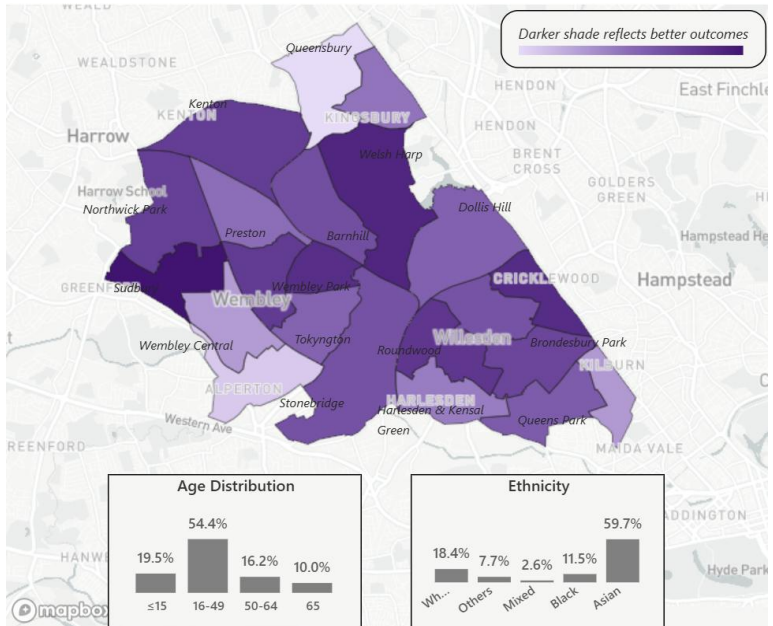
Page 6

The following maps of Brent show how each of the 22 wards perform against the four Wellbeing Index pillars. Darker areas reflect better outcomes for that pillar, while lighter areas reflect worse outcomes.

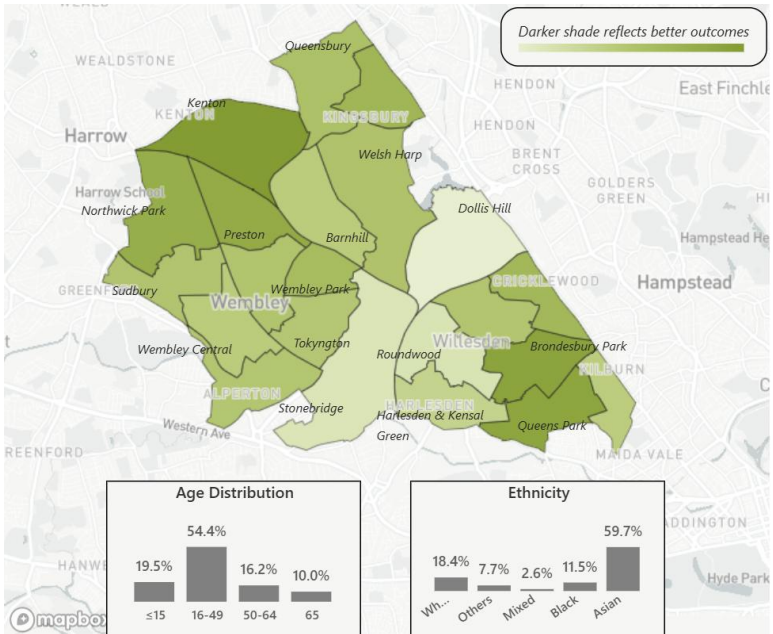
Security & Stability



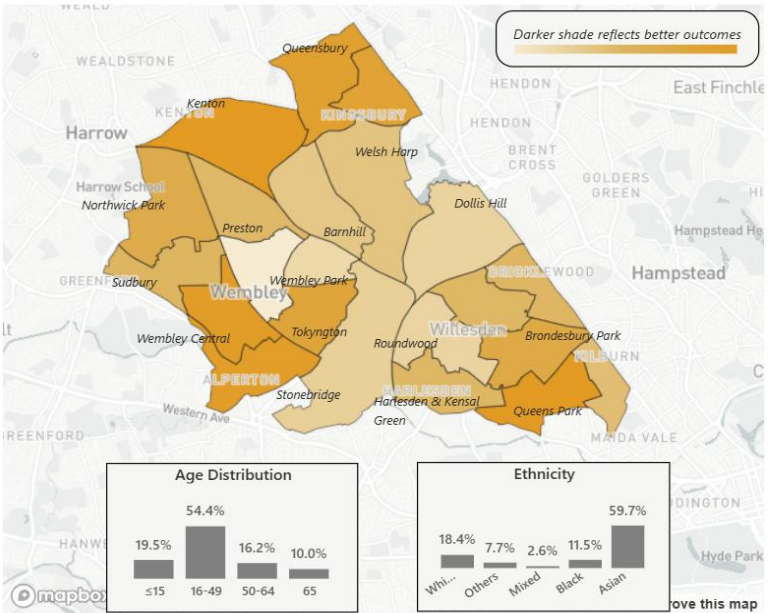
Opportunity & Social Mobility



Health & Longevity



Belonging & Trust



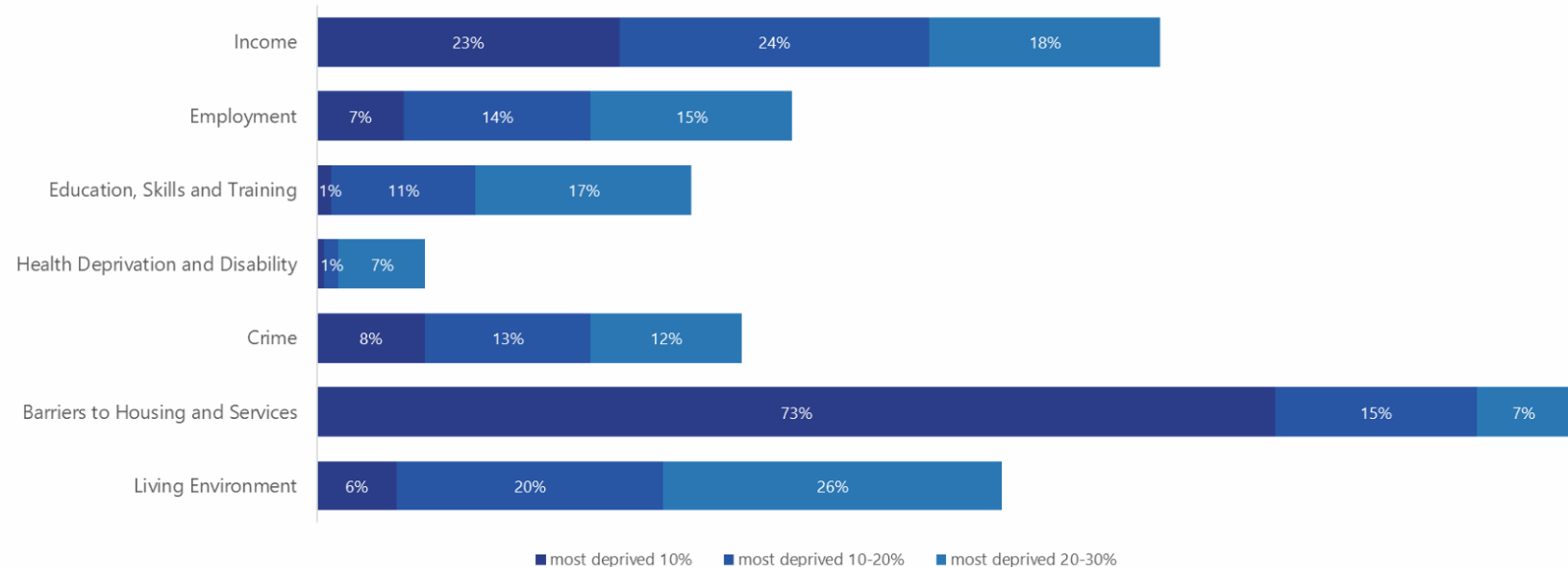
Indices of Deprivation 2025

The Indices of Deprivation are published by the government and are the primary measures of deprivation for small areas in England called LSOAs (Lower layer Super Output Areas). The Index of Multiple Deprivation combines seven distinct aspects (domains) as seen in the graph on the right.

Brent's level of relative deprivation varies between the domains. The **highest level of deprivation is in Barriers to Housing and Services**, where nearly half of wards (10/22) are in the most deprived 5% nationally. Brent's lowest level of relative deprivation is in the Health Deprivation and Disability domain, where zero wards are in the most deprived 20% nationally.

How this shaped the Plan

Because the Indices of Deprivation tell us that Brent has high levels of deprivation in the Barriers to Housing and Services domain, the Council Plan includes a strong focus on working to increase access to affordable housing, doing all we can to end homelessness, and helping people to live in good-quality, safe and secure homes. More detail on how we'll support people to access affordable, good-quality, safe and secure housing is set out in the Council Plan's focus area **A good place to call home**.



Poverty and Inequality data

We gathered data on poverty and inequality in Brent from Trust for London, an independent charitable foundation that fights to tackle poverty and inequality in London.

The data highlights Brent’s key social and economic challenges, and where targeted action is needed. The indicators show pressures relating to child poverty, income, unemployment and out-of-work benefits, where Brent is performing worse than the London average.

Read the [full rankings](#).

How this shaped the Plan

The Council Plan’s focus area, **Tackling the cost of living by unlocking potential** is about trying to address the poverty and inequality challenges that this data shows us. The focus area includes a number of commitments around supporting residents to access and navigate financial support and advice, and creating more opportunities for young people to access training, apprenticeships and employment. Our work in these areas is about trying to help residents out of poverty and achieve their ambitions.

Child poverty

42.3%

of children lived in households with an income below **60% of the UK median** after housing costs (2024/25).

Higher than the London average

Below the living wage

22.6%

of residents were estimated to be **earning below the Living Wage** (2025).

Higher than the London average

Pay inequality

2.28

pay ratio between higher and lower earners (2025)

Around the same as the London average

Qualifications

8.7%

of adults had no recognised qualifications (2025).

Around the same as the London average

Household income

£64,100

Average gross household income (2022/23)

Lower than the London average

Income after housing costs

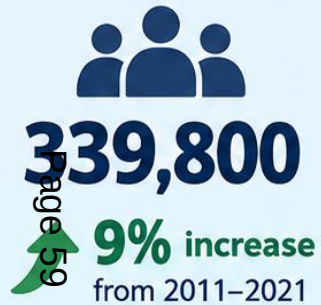
33%

of the borough lived in households with an **income of less than 60% of the UK median after housing costs**. Around the same as the London average

Census 2021

This page shows you what makes Brent unique. We got this information from the Census, which is carried out by the Office for National Statistics every 10 years. This data paints a reliable picture of our population. By understanding who lives in our borough, and how communities are changing, we can identify current and emerging needs, spread resources effectively and ensure Council Plan priorities reflect the needs of our residents.

Total population



Population rank in London's boroughs

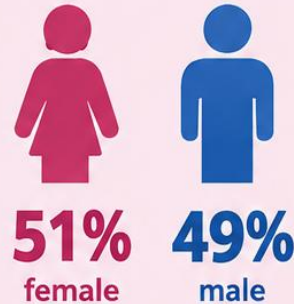
5th

largest borough
population

Population density



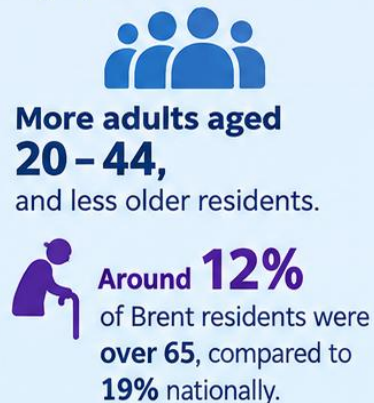
Gender



Main language



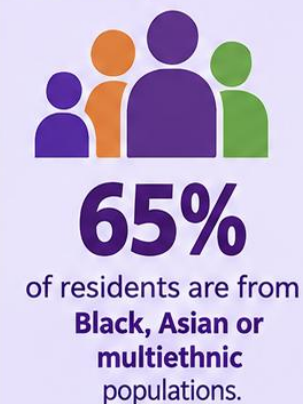
Age profile



Place of birth

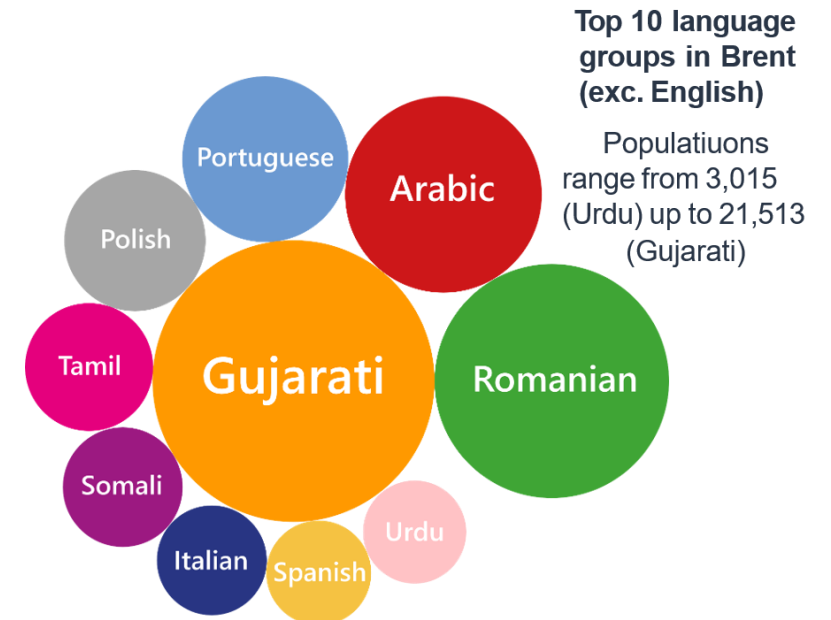


Ethnicity



How this shaped the Plan

The Census data reminds us that Brent is made up of a large number of distinct communities. Because of this, we recognise that we can't have one-size-fits-all services. That's why the Council Plan us to working closely with communities to understand their needs, and making sure that we tailor the services that we provide to meet those needs.



Challenges and Opportunities - Footnotes

The footnotes on this page refer to the challenges and opportunities on pages 13 & 14

1. [Brent Homelessness and Rough Sleeping Strategy 2026-31](#)
2. [Brent Homelessness and Rough Sleeping Strategy 2026-31](#)
3. [Analysis of the 2025 Indices of Deprivation](#)
4. [Trust for London](#)
5. [Analysis of the 2025 Indices of Deprivation](#)
6. [Open data: Brent 2021 Census analysis](#)
7. [Office for Health Improvement and Disparities Fingertips](#)
8. [Office for Health Improvement and Disparities Fingertips](#)
9. Residents' views that are referenced are based on responses from over 2,000 people who took part in the 2026 Resident Attitudes Survey carried out by an independent researcher, [DJS Research](#), over Summer 2026. Results were weighted to ensure they are representative of Brent's population and provide an accurate picture of what matters most to residents. Resident Attitudes Survey, [Brent Open Data](#)
10. Resident Attitudes Survey, [Brent Open Data](#)
11. [Safer Brent Partnership, annual report 2024-25](#)
12. [L8nform](#). **Note:** Data includes only adults who were new to Adult Social Care and those who had not received ongoing support in the previous 12 months. ASC also carries out a significant number of short-term assessments.
13. Brent internal data
14. [Autumn Budget 2026: LGA submission | Local Government Association](#)
15. [Councils warn of £7bn funding black hole threatening local services in three years | Local Government Association](#)
16. [London Councils: Budget 2026 press release](#)
17. Resident Attitudes Survey, [Brent Open Data](#)
18. [Labour Market Profile – Brent \(Nomis\)](#)
19. [Wembley Stadium: planning application](#)
20. [Brent 2021 Census analysis](#)
21. Resident Attitudes Survey, [Brent Open Data](#)
22. [Brent Cultural Strategy](#)
23. Resident Attitudes Survey, [Brent Open Data](#)



EQUALITY IMPACT ASSESSMENT (EIA)

POLICY/PROPOSAL:	Council Plan 2026-2030
DEPARTMENT:	Democratic & Corporate Governance
TEAM:	Policy and Performance
LEAD OFFICER:	Grace Hall
DATE:	9 September 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 Brent Council Plan 2026–2030 aims to improve outcomes for residents by focusing on ensuring people have a good place to call home, live in cleaner, greener and safer neighbourhoods, and can access thriving town centres and high streets. It also focuses on helping people to address cost of living pressures, unlock their potential through access to education, skills, training and employment opportunities, and access opportunities to live active and healthy lifestyles. The Plan commits to changing the ways that the Council works in order to deliver these outcomes for residents.

The Plan sets out the Council's priorities and commitments for the borough over the next four years. It is structured around three strategic priorities: A borough to be proud of; A borough where people thrive; and, A council that delivers for you.

The Plan has been informed by engagement with Councillors, residents, communities, staff and partners, and responds to both the opportunities and challenges facing Brent. It seeks to address issues including housing pressures, health and socio-economic inequalities, the continuing impact of the cost-of-living crisis, and the financial challenges facing local government, while creating opportunities to improve outcomes, reduce inequalities and ensure that all residents can access the support, services and opportunities they need.

These outcomes will be supported through prevention and early intervention, partnership and neighbourhood-based working, improved access to services, evidence-based decision-making and organisational improvement.

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

The Council Plan is intended to benefit all residents, businesses and communities across Brent. However, some groups may experience particular benefits because of the Plan's focus on improving neighbourhoods, addressing inequalities, improving access to services and opportunities, and supporting those facing the greatest barriers or disadvantages.

It is expected to have a positive impact on residents experiencing socio-economic disadvantage, those at risk of and experiencing homelessness, and children and young people.

3. If no groups are affected, explain why.

N/A

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>people at risk of or experiencing homelessness</i>	x		

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

4. 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

5. 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.

The development of the Council Plan has been informed by a range of quantitative and qualitative evidence. These include demographic data and protected characteristic data from the 2021 Census, Brent Open Data, service data, performance information, relevant local needs assessments, resident insight, and evidence gathered through engagement activities undertaken to support development of the Plan.

The Council has undertaken engagement to understand the priorities, needs and experiences of residents, communities, elected members, staff and partners. Feedback gathered through this process has informed the development of the Council Plan's priorities, commitments and intended outcomes.

Evidence used to inform this assessment includes:

- Council Plan resident survey findings
- Council Plan staff survey findings
- Resident Attitudes Survey (RAS) findings
- Council All Staff survey findings
- Member engagement
- Demographic and protected characteristic data from Census 2021
- Brent Open Data and other relevant local intelligence sources
- Service and performance data where relevant

Detailed findings from the engagement programme and supporting evidence base are set out within the Council Plan Engagement and Evidence report. This document provides further information on the views expressed by residents and stakeholders.

6. For each characteristic:
- a. 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.
<p>The Plan includes commitments specifically aimed at children and young people, including piloting an Education Maintenance Allowance, introducing a School Uniform Grant and increased access to affordable physical activity opportunities. Older residents may also benefit from early intervention, health and wellbeing support, and neighbourhood-based services.</p> <p>The Delivery Plan will set out the detailed activities, timescales and key performance indicators that will support delivery of the Council Plan. This will provide a basis for monitoring outcomes and identifying whether further action is needed to address any differential impacts or inequalities arising from specific protected characteristics.</p>	<p>Brent is a relatively young borough. According to the 2021 census, the median age of Brent residents is 35 years, lower than the England average of 40 years. Around 24% of residents are aged under 20, while approximately 12% are aged 65 and over.</p>

Care Experience	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<p>No specific impacts relating to care experience have been identified. The Council Plan's commitments are intended to improve outcomes for all residents regardless of whether they are care experienced.</p> <p>However, while we have set a high level of ambition we are also operating within a difficult financial context which may impact or limit what we are able to achieve and the support we can provide for residents.</p>	

<p>The Delivery Plan will set out the detailed activities, timescales and key performance indicators that will support delivery of the Council Plan. This will provide a basis for monitoring outcomes and identifying whether further action is needed to address any differential impacts or inequalities arising from specific protected characteristics.</p>	
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Disability	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<p>No specific impacts relating to disability have been identified. The Council Plan's commitments are intended to improve outcomes for all residents regardless of whether they have a disability.</p> <p>However, while we have set a high level of ambition we are also operating within a difficult financial context which may impact or limit what we are able to achieve and the support we can provide for residents.</p> <p>The Delivery Plan will set out the detailed activities, timescales and key performance indicators that will support delivery of the Council Plan. This will provide a basis for monitoring outcomes and identifying whether further action is needed to address any differential impacts or inequalities arising from specific protected characteristics.</p>	<p>The 2021 Census found that approximately 14% of Brent residents (around 47,500 people) reported that their day-to-day activities were limited by a long-term physical or mental health condition, illness or disability.</p>

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

<p>No specific impacts relating to gender reassignment have been identified. The Council Plan's commitments are intended to improve outcomes for all residents regardless of whether they are transgender or non-binary.</p> <p>However, while we have set a high level of ambition we are also operating within a difficult financial context which may impact or limit what we are able to achieve and the support we can provide for residents. The Delivery Plan will set out the detailed activities, timescales and key performance indicators that will support delivery of the Council Plan. This will provide a basis for monitoring outcomes and identifying whether further action is needed to address any differential impacts or inequalities arising from specific protected characteristics.</p>	<p>We do not have an accurate demographic understanding of trans and non-binary residents of Brent, as ONS advised following the 2021 census that local authority-level gender identity data should be interpreted with caution because of known data quality issues, particularly in areas with higher levels of linguistic diversity such as Brent. The LGBTQ+ population in Brent - 2021 Census topic report Brent Open Data</p>
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Marriage and Civil Partnership	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<p>No specific impacts relating to marriage or civil partnership have been identified. The Council Plan's commitments are intended to improve outcomes for all residents regardless of relationship status.</p> <p>However, while we have set a high level of ambition we are also operating within a difficult financial context which may impact or limit what we are able to achieve and the support we can provide for residents.</p> <p>The Delivery Plan will set out the detailed activities, timescales and key performance indicators that will support delivery of the Council Plan. This will provide a basis for monitoring outcomes and identifying whether further action is needed to address any differential impacts or inequalities</p>	<p>Census 2021 shows that around 42% of Brent residents aged 16 and over were married or in a civil partnership. The remainder were single, divorced, separated or widowed. 2021 Census Profile for areas in England and Wales - Nomis</p>

arising from specific protected characteristics.	
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Pregnancy and Maternity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<p>No specific impacts relating to pregnancy or maternity have been identified. The Council Plan's commitments are intended to improve outcomes for all residents regardless of their pregnancy or maternity status.</p> <p>However, while we have set a high level of ambition we are also operating within a difficult financial context which may impact or limit what we are able to achieve and the support we can provide for residents.</p> <p>The Delivery Plan will set out the detailed activities, timescales and key performance indicators that will support delivery of the Council Plan. This will provide a basis for monitoring outcomes and identifying whether further action is needed to address any differential impacts or inequalities arising from specific protected characteristics.</p>	<p>Brent has a relatively young population compared with England overall, with a median age of 35 compared with 40 nationally. The borough also has a substantial population of families with dependent children. As a result, policies affecting housing affordability, access to childcare, household costs and family finances may have a greater impact on parents, expectant parents and households with dependent children in Brent than in areas with older population profiles.</p> <p>Population change in Brent Briefing 2025</p> <p>How life has changed in Brent: Census 2021</p>

Race and Ethnicity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<p>The Council Plan has priorities to improve the quality of life for all residents and service users, especially those that are in most need of additional support and assistance.</p> <p>While we have set a high level of ambition we are also operating within a difficult</p>	<p>Brent is one of the most ethnically diverse boroughs in England. According to Census 2021, approximately 64% of residents identified with Asian, Black, Mixed or Other ethnic groups, while around 36% identified as White. Brent Census Atlas 2021 - Ethnicity Brent Open Data</p>

<p>financial context which may impact or limit what we are able to achieve and the support we can provide for residents.</p> <p>Some commitments may be particularly relevant to ethnic groups that experience poorer outcomes or greater barriers in areas such as housing, health, employment, income and access to services. The Plan's focus on reducing inequalities, providing earlier and more joined-up support, and improving access to opportunities therefore has the potential to contribute to more equitable outcomes.</p> <p>The Delivery Plan will set out the detailed activities, timescales and key performance indicators that will support delivery of the Council Plan. This will provide a basis for monitoring outcomes and identifying whether further action is needed to address any differential impacts or inequalities arising from specific protected characteristics.</p>	<p>Nomis - 2021 Census Area Profile - Brent Local Authority</p>
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Religion or Belief	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<p>No specific impacts relating to religion or belief have been identified. The Council Plan's commitments are intended to improve outcomes for all residents regardless of their religion or belief.</p> <p>However, while we have set a high level of ambition we are also operating within a difficult financial context which may impact or limit what we are able to achieve and the support we can provide for residents.</p> <p>The Delivery Plan will set out the detailed activities, timescales and key performance indicators that will support delivery of the</p>	<p>Brent residents are more likely to have a religion than those elsewhere: overall, 80% of residents had a religion compared with 57% nationally – the 4th highest rate in England and Wales.</p> <p>Census 2021 data shows that approximately 34% of residents identified as Christian, 21% as Hindu, 18% as Muslim and 8% as Sikh. Around 10% reported having no religion. Religion in Brent – 2021 Census factsheet Brent Open Data</p>

Council Plan. This will provide a basis for monitoring outcomes and identifying whether further action is needed to address any differential impacts or inequalities arising from specific protected characteristics.	
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Sex	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<p>No specific impacts relating to sex have been identified. The Council Plan's commitments are intended to improve outcomes for all residents regardless of their sex.</p> <p>However, while we have set a high level of ambition we are also operating within a difficult financial context which may impact or limit what we are able to achieve and the support we can provide for residents.</p> <p>The Delivery Plan will set out the detailed activities, timescales and key performance indicators that will support delivery of the Council Plan. This will provide a basis for monitoring outcomes and identifying whether further action is needed to address any differential impacts or inequalities arising from specific protected characteristics.</p>	<p>The Census 2021 shows Brent's population is broadly evenly split between women (approximately 51%) and men (approximately 49%).</p> <p>2021 Census - First release Brent Open Data</p>

Sexual Orientation	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<p>No specific impacts relating to sexual orientation have been identified. The Council Plan's commitments are intended to improve outcomes for all residents regardless of their sexual orientation.</p>	<p>The 2021 Census was the first to collect information on sexual orientation. In Brent, 85.1% of residents aged 16 and over identified as heterosexual or straight, while 3.2% identified as lesbian, gay, bisexual or another minority sexual orientation, equivalent to approximately 8,800</p>

<p>However, while we have set a high level of ambition we are also operating within a difficult financial context which may impact or limit what we are able to achieve and the support we can provide for residents.</p> <p>The Delivery Plan will set out the detailed activities, timescales and key performance indicators that will support delivery of the Council Plan. This will provide a basis for monitoring outcomes and identifying whether further action is needed to address any differential impacts or inequalities arising from specific protected characteristics.</p>	<p>residents. A further 11.7% chose not to answer the question, which was considerably higher than the national non-response rate of 7.5%, meaning the figures are likely to be a minimum estimate of Brent's LGBT+ population. LGBTQ+ population in Brent - 2021 Census topic report - revised</p>
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Socio-Economic Status	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<p>The Council Plan is expected to have a positive impact on residents experiencing socio-economic disadvantage. A significant proportion of the Plan focuses on reducing poverty, supporting residents through the cost-of-living crisis, preventing homelessness, improving access to employment and skills opportunities, improving access to opportunities to participate in sport and leisure activity, and ensuring residents can access support at an earlier stage before problems escalate into crisis.</p> <p>The Council Plan includes a number of commitments intended to reduce the impact of poverty and increase opportunities for residents, including:</p> <ul style="list-style-type: none"> • Providing targeted support for residents facing financial hardship through programmes including the Holiday Activities and Food Programme, Resident Support Fund Crisis Payments and Council Tax Support Scheme. 	<p>Brent has comparatively high levels of socio-economic disadvantage and poverty. Data on poverty and inequality indicate that around 33% of Brent residents live in poverty, compared with 22% across England, and the child poverty rate is estimated to be 42%, significantly above both the England and London averages. Poverty & Inequality Data Brent Trust For London Trust for London</p>

<ul style="list-style-type: none"> • Piloting an Education Maintenance Allowance and School Uniform Grant to help reduce financial pressures on families and improve opportunities for young people. • Creating more opportunities for residents to access education, training, skills development, apprenticeships and employment support. • Creating more opportunities for residents to access opportunities to participate in sport and leisure activity. • Investing in and supporting the delivery of more affordable homes. • Supporting residents to prevent homelessness, including through targeted initiatives to sustain private rented sector tenancies. • Making services easier to access, providing earlier support to prevent problems from becoming crises, and improving how services work together to help residents receive the right support at the right time. <p>The Delivery Plan will set out the detailed activities, timescales and key performance indicators that will support delivery of the Council Plan. This will provide a basis for monitoring outcomes and identifying whether further action is needed to address any differential impacts or inequalities arising from specific protected characteristics.</p>	
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Other Relevant Groups – People at risk of or experiencing homelessness	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.

<p>The Council Plan is expected to have a positive impact on people at risk of or experiencing homelessness. It includes commitments to prevent homelessness through earlier advice and support, help more residents remain in their homes, increase access to affordable and suitable housing, and support people experiencing homelessness into stable accommodation with the support they need to regain independence.</p> <p>The Plan also aims to reduce the need for, cost of, and time spent in temporary accommodation, improve housing conditions in the social and private rented sectors, and make council services easier to access and more joined-up. Together, these commitments should help address both the immediate impact of homelessness and some of the wider factors that contribute to housing insecurity.</p> <p>The Delivery Plan will set out the detailed activities, timescales and key performance indicators that will support delivery of the Council Plan. This will provide a basis for monitoring outcomes and identifying whether further action is needed to address any differential impacts or inequalities arising from specific protected characteristics.</p>	<p>As of early 2026, 2,450 Brent households were living in temporary accommodation, with 60% placed in nightly-paid accommodation. During 2025, 1,069 households entered temporary accommodation and 866 exited, resulting in a net increase of 203 households. 9. Temporary Accommodation Supported Exempt Accommodation and Homelessness Prevention.pdf</p> <p>An average of 170 households approach the Council each week as homeless or at risk of homelessness, and around 20 new households enter temporary accommodation each week. Around 4,600 children were living in temporary accommodation, with nearly one in ten households in temporary accommodation sharing facilities.</p> <p>Temporary accommodation use increased from 2,088 households in September 2019 to 2,400 in August 2025. Over the same period, the number of households in bed and breakfast accommodation increased from 49 to 208.</p> <p>London Borough of Brent Homeless and Rough Sleeping Strategy</p>
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7. 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.

All engagement was with relevant stakeholders, including those that will be affected by the Plan. A broad spectrum of engagement, through a range of different methods and platforms, ensured that as many voices as possible were captured, including from marginalised and minority groups. Engagement responses have been used to identify the

priorities, concerns and ambitions of residents, and have informed Council Plan content and future council activity and service delivery.

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

N/A

SECTION C – CONCLUSIONS

9. 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.

Overall, the Council Plan should have a positive impact on our residents, communities and service users. Performance monitoring and reporting arrangements, which will be developed in conjunction with the Council Plan, will enable efficient monitoring and evaluation of progress against key priorities going forward.

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
Positive impacts are anticipated for children and young people, but these will depend on implementation of relevant Council Plan commitments	Review the EIA once the Delivery Plan and associated monitoring arrangements are established, updating the assessment and action plan if new equality impacts or evidence are identified.		At first EIA review	Not started
Positive impacts are anticipated for residents experiencing socio-economic disadvantage and people at risk of or experiencing homelessness	Review the EIA once the Delivery Plan and associated monitoring arrangements are established, updating the assessment and action plan if new equality impacts or evidence are identified.		At first EIA review	Not started
The detailed Delivery Plan is still in development, so further or differential equality impacts may emerge as commitments are implemented	Review the EIA once the Delivery Plan and associated monitoring arrangements are established, updating the assessment and action plan if new equality impacts or evidence are identified.		Within six months of Delivery Plan approval	Not started

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

A detailed delivery plan and key performance indicators will be developed to support delivery and demonstrate progress. Work is also being undertaken to reset Brent's performance monitoring and reporting approach, to ensure robust consideration of the progress that the Council is making to deliver the Council Plan and the outcomes it is delivering for residents. Delivery and performance monitoring and reporting arrangements will be continually reviewed to ensure that the ambitions of the Plan are effectively monitored, reviewed, evaluated and delivered.

SECTION F – SIGN OFF

	Signature	Date
Officer:	Grace Hall	7 September 2026
Reviewing Officer or Head of Service	Amira Nassr	10 September 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 9 November 2026
	Report from the Corporate Director of Finance and Resources
	Lead Member – Deputy Leader & Cabinet Member for Finance & Resources (Councillor Gwen Grahll)
Q1 Performance Update 2026-27	

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
List of Appendices:	Two Appendix A: Borough Plan Scorecard Appendix B: Dashboard Navigation & Guide
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Grace Hall, Policy and Performance Manager 020 8937 1471 Grace.hall@brent.gov.uk Anisha Fernandes, Senior Performance Officer, 020 8937 3927 Anisha.Fernandes@brent.gov.uk Daniel Henderson, Senior Performance Officer, 020 8937 2841 Daniel.Henderson@brent.gov.uk

1.0 Executive summary

- 1.1 This report presents performance against the Borough Plan 2023–2027 key performance indicators for Quarter 1 of 2026/27, supported by the performance scorecard and commentary on specific areas of performance.
- 1.2 A new suite of KPIs is being developed alongside the new Council Plan, which is due to be considered by Full Council on 16 November 2026. During the transition

to the new Council Plan and associated performance reporting arrangements, the Council will take a more streamlined approach to performance reporting.

2.0 Recommendation(s)

Cabinet are asked to:

- 2.1 Note and comment on the Q1 performance reporting set out in section 3.3.
- 2.2 Note the development of a new suite of KPIs alongside the new Council Plan and the more streamlined approach to performance reporting during the transition.

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 A suite of KPIs was developed to monitor delivery of the *Borough Plan 2023 – 2027: Moving Brent Forward Together*. These KPIs have been reported on formally each quarter to Cabinet, via dashboards and commentary on specific areas of performance.

3.2 Council Plan and future performance reporting

- 3.2.1 A new suite of key performance indicators is being developed to sit alongside the new Council Plan, which is due to be considered by Full Council on 16 November 2026. These indicators will support monitoring and reporting of progress against the Plan's priorities.
- 3.2.2 During the transition to the new Council Plan and associated performance reporting arrangements, the Council will take a more streamlined approach to performance reporting, focusing on Borough Plan key performance indicators that are showing as red.

3.3 Borough Plan performance Q1

- 3.3.1 The Q1 performance scorecard includes a total of 60 key indicators from the Borough Plan.
- 3.3.2 Each KPI is assigned a Red, Amber, or Green rating based on its performance against the quarterly targets.
 - Green – KPI has met or exceeded its target.
 - Amber – KPI is slightly off target, falling between 0.01% and 5% outside the target.
 - Red – KPI is significantly off target, exceeding 5% variance from the target.

3.3.3 Of the 60 Borough Plan indicators reported this quarter, 52% were Green, 25% Red and the remainder Amber or contextual. Performance breakdown for Q1 Borough Plan indicators is as follows:

Priority	Red	Amber	Green	Contextual
Prosperity and Stability in Brent	7	1	10	4
Cleaner, Greener future	1	1	7	4
Thriving communities	0	0	4	2
The Best start in life	5	1	4	0
A Healthier Brent	2	1	6	0
Total	15	4	31	10

Table 2: Borough plan performance summary

3.3.4 KPIs that have been consistently rated Red for consecutive quarters Q2 (2025/26) to Q1 (2026/27) are highlighted below to aid discussion:

- Number of Houses of Multiple Occupation (HMO) licensed
- Participants in Brent Care Journeys
- Percentage of Looked After Children (LAC) in Education, Employment, or Training (EET)
- Second or subsequent Child Protection (CP) plans

Prosperity and Stability in Brent

Red KPIs

3.3.5 A total of 25 job outcomes were achieved through Brent Works, below the target of 37. The service continues to support Brent residents into sustainable employment, with performance to be monitored over subsequent quarters.

3.3.6 A total of 9 apprenticeship outcomes were achieved, below the target of 12. Performance is in line with expected seasonal patterns, as apprenticeship recruitment is typically lower at the start of the year, with most starts commencing in September and higher levels of activity expected during Q2 and Q3.

3.3.7 One affordable home was delivered by i4B, below the quarterly target of 4. A further 9 properties are currently at various stages of conveyancing, with completion being sought during the financial year. I4B continues to identify potential acquisition opportunities through fortnightly property panel, although increased interest rates continue to present a challenge. The company is also exploring alternatives ways to increase housing supply.

3.3.8 A total of two properties were brought back into use, below the target of 12. Performance is expected to increase as properties currently in the pipeline become occupied and can be recorded, including 4 units nearing grant

completion and a further 10 awaiting approval. Additional properties are also expected to be brought back into use through council intervention.

- 3.3.9 The number of Houses in Multiple Occupation (HMOs) licensed within the borough stands at 4,721, below the target of 5,500. The service is continuing to work through the backlog of additional licence applications, which has affected the overall number of licensed HMOs.
- 3.3.10 A total of 7 job and apprenticeship opportunities were created in growth industries across the borough missing target of 8. Of the 9 apprenticeship outcomes achieved through Brent Works, 7 were within growth industries, demonstrating a strong focus on supporting residents into opportunities in key growth sectors.
- 3.3.11 The average time for processing changes of circumstances was 7 days, above the target of 5 days. Performance was affected by higher volumes of incoming changes at the start of the financial year, alongside reduced resource capacity. Cases where there was a risk of overpayment or financial hardship were prioritised, and processing times improved in June compared with the previous month.

Amber, Green and Contextual KPIs

- 3.3.12 The average time taken to process Resident Support Fund (RSF) Crisis Payment applications was 21 days, marginally above the target of 20 days, resulting in an Amber rating. Performance improved from 28 days in May to 21 days in June. A small backlog remains, with measures being put in place to reduce this and improve processing times.
- 3.3.13 80.4% of enquiries at Community Hubs were resolved at the point of contact, exceeding the target of 80%. Performance improved across the quarter, increasing from 77% in April and 78% in May to 85% in June, indicating improved service delivery. Unrecorded outcomes identified in April are being investigated with the team to improve data quality.
- 3.3.14 The percentage of jobs secured paying the London Living Wage (LLW) was 84%, exceeding the target of 80%. Performance has exceeded expectations, reflecting strong delivery of quality employment opportunities for Brent residents.
- 3.3.15 The average number of days taken to process new benefit claims was 21 days, which continues to slightly exceed the target of 22 days. The team is working on clearing all unassigned Council Tax Support (CTS) and Housing benefits (HB) new claims and diary work.
- 3.3.16 The percentage of Black, Asian and Minority Ethnic employees remained consistent at 72%, which is the highest across all London boroughs.
- 3.3.17 Brent Start recorded an overall achievement rate of 93% for the academic year, which meets the 93% target. This represents the end of the 2024/25 academic

year. This is because we do not have verified (by the GLA) data until October of the following year. The next update will be available in October 2026 for the 2025/26 academic year.

- 3.3.18 A total of 4,442 enquiries were received through Community Hubs, with demand fluctuating across the quarter from 1,448 in April and 1,342 in May to 1,652 in June. The increase in June was primarily driven by demand relating to Housing and Homelessness, Council Tax and Welfare Benefits, which were the most frequently presented needs.
- 3.3.19 The percentage of local suppliers used in this quarter was 29.1%, exceeding the target of 25%. Local suppliers are defined as suppliers who have a Brent post code. These can be a mix of local businesses and national organisations who have a presence in Brent.
- 3.3.20 A total of 45 local apprenticeships and work experience opportunities were delivered, exceeding the target of 20. Through our social value commitments, we continue to create apprenticeships and work experience opportunities, with a particular focus on disadvantaged groups. At this point, we have had an average of 45 apprentices on the programme.
- 3.3.21 There were 2,552 households in temporary accommodation (TA) at the end of the quarter. The high number of households in TA continues to be driven by the limited supply of affordable accommodation available to move homeless households into. The recent decrease in approaches is expected to continue following implementation of the Renters' Rights Act, which should help reduce the number of households being evicted from their private rented sector tenancies and entering temporary accommodation.
- 3.3.22 The Average days taken to process Crisis Response Fund (CRF) – Housing Payment applications was 21 days, within the target of 30 days. This measure relates specifically to Housing Payment applications and is separate from the RSF Crisis Payment measure reported at paragraph 3.4.12. The funding supports households experiencing financial hardship, helping to prevent rent arrears from escalating and reduce the risk of eviction and homelessness.
- 3.3.23 A total of 168 new council homes were delivered, comprising 155 homes at Alperton Bus Garage and 13 homes at Clock Cottage.
- 3.3.24 A total of 154 referrals to food banks were made through Brent Hubs. Demand has reduced significantly following the transfer of the Food and Fuel Aid phone line from Brent Hubs to the Contact Centre. Referrals through the Hubs have since remained relatively stable, with residents accessing support through alternative routes and the Hubs primarily supporting reassessments for ongoing food aid.
- 3.3.25 A total of 576 applications were made to the Resident Support Fund Digital Support Package. The scheme supports residents experiencing digital exclusion by providing access to essential digital equipment and connectivity,

helping them access employment, education, healthcare, welfare and other online services.

- 3.3.26 There were no affordable homes delivered by external partner providers during the quarter, as no completions were scheduled for this period.

Cleaner, Greener Future

Red KPIs

- 3.3.27 No Red KPIs to report.

Amber, Green and Contextual KPIs

- 3.3.28 94.3% of reported and inspected Category 2 defects were repaired on time, below the target of 98% and resulting in an Amber rating. Performance has historically remained consistently at 100%; however, it declined during May and June. This has been discussed with the contractor, and an improvement plan has been put in place to return performance to target from July.
- 3.3.29 In Q1, 98.6% of residential fly-tips were cleared by the contractor within 48 hours, exceeding the 95% target. Service continues to exceed the contractual performance target of 95%. This quarter, a monthly average of 2,971 fly-tips were cleared within the SLA.
- 3.3.30 Carbon emissions from the Council's own estate and operations reduced by 75.8% against the 2010–11 baseline, exceeding the target of 71.7%. This has primarily been due to targeted energy reductions in several areas in the Civic Centre, plus further decarbonisation of the national electricity grid causing the GHG conversion factor for electricity to reduce again. The council is continuing to develop a comprehensive plan for achieving net zero across its estate and operations by 2030.
- 3.3.31 A total of 240 bike hangars were installed, significantly exceeding the target of 41. This included the installation of the final five NCIL-funded bike hangars. Planning is now underway for this year's TfL-funded programme.
- 3.3.32 The proportion of borough schools with a School Street scheme reached 47%, exceeding the target of 39%. Consultations are underway for further TfL and NCIL-funded School Streets, with decisions expected in August and, where supported, implementation planned for the Autumn term.
- 3.3.33 Brent's recycling rate - Data currently been finalized by the service.
- 3.3.34 A total of 3,464 fly-tipping incidents were investigated, exceeding the target of 3,000. The increase reflects improved recording practices, with officers more consistently logging investigations being undertaken. Not all investigations will result in formal enforcement action.

- 3.3.35 The proportion of sites failing street cleansing standards for litter was 4%, improving from 5% in the previous quarter. Weekly inspections are undertaken jointly by Neighborhood Managers and the contractor in line with NI195 standards, with current results indicating that street cleansing standards remain at an acceptable level.
- 3.3.36 The average kilograms of residual waste collected per household - Data currently been finalized by the service.
- 3.3.37 A total of 595 formal enforcement actions were taken against fly-tipping offences. While operational focus shifted towards increased seasonal PSPO enforcement activity, a strong level of fly-tipping enforcement continued to be maintained.
- 3.3.38 No projects were awarded funding through the Together Towards Zero (TTZ) grant scheme this quarter, as Round 5 launched following the elections in mid-June 2026. The first judging panel meetings have since taken place, with funding awards expected as the assessment process progresses.
- 3.3.39 A total of 1,729 council housing units have been retrofitted with at least one energy efficiency measure. Further improvements have been delivered through the Social Housing Decarbonisation Fund and integrated into the existing housing capital program.
- 3.3.40 No new electric vehicle fast chargers were installed during the quarter. Procurement is underway for LEVI-funded charging points, to be delivered in partnership with six other boroughs. A target has not yet been set as the level of funding available for delivery this year is still to be confirmed.

Thriving Communities

Red KPIs

- 3.3.41 No Red KPIs

Green and Contextual KPIs

- 3.3.42 A total of 228,350 books were issued, exceeding the target of 170,391. Performance remained strong across several libraries, with Harlesden, Kilburn, Kingsbury and Wembley demonstrating good levels of engagement. The Home Library Service also benefited from its new aligned delivery schedule, while the e-Library exceeded its June target by 1.4%. Ealing Road Library and The Library at Willesden Green remained below target. Library and Outreach Managers will continue to refine their 2026/27 team plans, with targeted activity focused on addressing areas of underperformance and improving outcomes.
- 3.3.43 A total of 316,363 library visits were recorded. Harlesden and Kilburn libraries exceeded their visitor targets, with Kilburn recording particularly strong footfall in June. Ealing Road, Kingsbury, Wembley and The Library at Willesden Green were below target, with the heatwave affecting footfall and resulting in

cancellations of planned school visits and activities. Targeted activity will continue, including school engagement, promotion of the Summer Fun Festival and increased community engagement in areas where visitor numbers are below target.

- 3.3.44 A total of 68 hours were contributed by suppliers through social value commitments to support community events and activities, exceeding the quarterly target of 65 hours. These commitments support community outcomes through activities including training and events. Q1 performance was calculated in line with the previous Social Value Policy. From Q2, reporting will align with the new policy, with the target also reviewed to ensure it remains appropriate, including whether the measure should become contextual.
- 3.3.45 A total of 8,141 visits to museums were recorded. This is a new KPI for 2026/27, and the target is currently being reviewed and finalised. Performance will be monitored over the coming quarters to establish an appropriate baseline and support future target setting.
- 3.3.46 A total of 1,019 Resident Support Fund applications were approved in Q1. The fund provides temporary financial relief to households facing immediate hardship and supports residents to stabilise their circumstances during periods of financial difficulty. The continued use of this funding reflects the ongoing pressures many residents are experiencing due to rising living costs and economic uncertainty.
- 3.3.47 There will be no Brent Connects data reported at this stage, while a new approach is being developed and agreed. Reporting will resume once the revised approach has been finalised and implemented.

The Best Start in Life

Red KPIs

- 3.3.48 A total of 23 distinct young people attended Brent Youth Parliament (BYP) meetings, below the target of 35. Attendance is typically lower during this period due to young people sitting exams. There were 16 attendees in April and 12 in June, with no BYP meeting held in May.
- 3.3.49 A total of 15 distinct young people participated in Brent Care Journeys, below the target of 35. This comprised eight Care Leavers and seven young people aged 11–17, participating in activities including the Corporate Parenting Committee, the BCJ Empire Easter trip, co-design sessions and planning for summer activities. Participation was affected by the cancellation of some council committees during the election period and typically lower attendance in May and June due to exams. Brent Care Journeys Empire (formerly BCJ 2.0) was launched in April following a co-design and branding project with young people, with 12 young people, eight guests and 39 professionals attending the launch event.

- 3.3.50 The percentage of care leavers aged 19-21 who are engaged in education, employment, or training (EET) is 51% for those with birthdays in Q1, which is 4% less than Q4. It remains 6% below the target of 57%. This is a KPI which varies from quarter to quarter due to the relatively low cohort size. The Virtual School for looked after children works closely with Personal Advisors to target support for those eligible young people who are NEET. Further targeted activity from Pas, linking closely to Brent Works will be prioritised from the new academic year to improve this indicator.
- 3.3.51 The proportion of children on a child protection (CP) plan for a second or subsequent time has decreased from 19.1% to 18.1% but is above our 12% target. Repeat CP cases are tracked monthly and reported to the Corporate Director. Current cases are being dip sampled to identify any common themes, and any actions will be included in the practice improvement plan for 2026/27.
- 3.3.52 The Care Leavers Hub is also open to and attended by Care Leavers over the age of 25 years alongside our 18-25 cohort and is designed to provide a social space for our care experienced young adults. The Hub activities continue with a fluctuating number of attendees. Every other month the group meet at Brent Civic Centre for a games night (and Pizza) and on alternate months smaller groups participate in chosen activities. In April 2026, 10 young adults attended the Games & Pizza Night. In May 2026, 5 young adults attended the Theatre to watch Hercules. In June 2026, 7 young adults attended the Games and Pizza Night. While the overall attendance level fluctuates, this has been normal throughout the duration of the Hub. The Hub calendar is shared via the Leaving Care WhatsApp Channel and Personal Advisor's ensure that care leavers are aware of the offer and encouraged to attend. Staff continue to gather feedback from the young people to shape future activities and maximise engagement opportunities for Care Leavers.

Amber, Green and Contextual KPIs

- 3.3.53 The percentage of Looked After Children (CLA) in education, employment or training for Year 12 and 13 has been maintained at 78% from Q4, 2% below the 80% target, rating this measure Amber. This sustained performance reflects the continued support provided to young people to help them access and sustain education, employment and training opportunities.
- 3.3.54 33% of permanent exclusions of pupils in Brent secondary schools were from Black, Asian and Minority Ethnic communities, below the target threshold of 50%. This is an improvement from 56% in the previous reporting period. However, the relatively small cohort size means performance can fluctuate significantly between quarters and should therefore be interpreted with caution.
- 3.3.55 A total of 11 quality assurance visits were carried out in Q1, above the quarterly target of 6. None of the quality assurance visits were with a Care Quality Ambassadors and this will be addressed for Q2.

- 3.3.56 The Family Wellbeing Centres (FWC) continue to have a strong reach as measured by the number of registered users who have had a contact with a FWC. In Q1 this was 7,596, a slight decrease from 8,105 in Q4.

A Healthier Brent

Red KPIs

- 3.3.57 The median wait time from request/referral to the start of the first response was 20 days in Q1, above the target of 14 days. This measure looks at the time from a resident's initial contact with Adult Social Care to the first completed response, which could include information and advice, signposting, triage, referral, a bridging service or progression to a Care Act assessment. Performance improved from 25 days in the previous quarter to 20 days, indicating that residents are receiving an initial response more quickly, although further improvement is required to meet the target.
- 3.3.58 There were 4 permanent placements for younger adults per 100,000 population, above both the target and benchmark of 3. There were 10 new admissions in Q1, compared with an expected figure of 9. Performance is slightly above target and will be monitored to ensure admissions to long-term care remain as low as appropriate through effective preventative and community-based support.

Amber and Green KPIs

- 3.3.59 The number of adults in structured treatment for opiates and alcohol was 1,397, three below the target of 1,400 and therefore rated Amber. This is based on rolling 12-month NDTMS (National Drug Treatment Monitoring System) data to April 2026, with May and June data not yet published. The service is focused on converting contacts into treatment and reversing the recent downward trend, with progress towards the year-end target of 1,425 expected over the coming quarters.
- 3.3.60 New birth visits completed within 14 days were 96.8%, exceeding the contractual target of 95%. Visits completed within 30 days were also above target at 98.8%, against a target of 98%. Performance continues the strong results seen in the previous financial year and reflects closer and more effective working with CLCH, supporting positive outcomes for new mothers in Brent.
- 3.3.61 A total of 181 community events took place, exceeding the target of 175. These include public health and Brent Health Matters health promotion and wellbeing events.
- 3.3.62 A total of 1,082 health checks were carried out, ahead of the target of 1,000. Health checks delivered through outreach events include BMI, blood pressure, heart rate and diabetes risk assessments. Outreach continues to focus on communities that may face barriers to engaging with health and care services, alongside increased case management activity. The approach and associated targets will be kept under review to ensure activity remains appropriately targeted.

- 3.3.63 The proportion of people requiring no ongoing support following reablement was 79%, exceeding the target of 76%. Performance remains strong and stable, increasing from 78% in 2025/26 to 79%, reflecting effective service delivery and positive outcomes in supporting people to maintain their independence.
- 3.3.64 The median wait time from request/referral to the start of the first service was 5 days, meeting the target of 5 days. This measures the time from a resident's initial contact with Adult Social Care to the start of their first recorded support service, such as commissioned care, reablement, equipment, day opportunities or direct payments. Performance increased slightly from 4 days in the previous quarter; however, residents continue to access support within the target timeframe.
- 3.3.65 There were 93 permanent placements for older adults per 100,000 population, below the target of 111 and the London benchmark of 114. There were 40 new admissions, also below the target of 48. Performance remains positive, with fewer older adults entering long-term residential and nursing care than expected, supporting the strategic aim of promoting independence and community-based support.

4.0 Stakeholder and ward member consultation and engagement

- 4.1 KPIs for the Borough Plan 2023-27 were developed in consultation with directorate performance leads and approved by PCG.
- 4.2 Balanced scorecard measures have been developed in consultation with Lead Members, PCG and nominated service leads.

5.0 Financial Considerations

- 5.1 There are no financial implications as a result of this report.

6.0 Legal Considerations

- 6.1 There is no statutory duty to report regularly to Cabinet on the Council's performance, however under the Local Government Act 1999 section 3 a best value authority has a statutory duty to secure continuous improvement in the way in which its functions are exercised having regard to a combination of economy, efficiency, and effectiveness. Guidance provides that: 'for many people, the services provided by their local authority have a very significant impact on their quality of life and provide their main experience of public services. It is vital that these services are delivered to a high standard, and in ways that are responsive to the needs of their users'.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 There are no direct diversity implications. The Learning, growth and culture 'perspective' of the Balanced Scorecard is designed to increase visibility of some existing EDI measures in relation to brent staff.

8.0 Climate Change and Environmental Considerations

- 8.1 Indicators that support delivery of the Brent Climate Emergency Strategy are included in the 'Cleaner, Greener Future' section of this report and in the first iteration of the Corporate Balanced scorecard.

9.0 Human Resources/Property Considerations (if appropriate)

- 9.1 There are none.

10.0 Communication Considerations

- 10.1 Performance reporting supports communication with residents about progress against the Council's priorities.

Related document(s) for reference:

[Cabinet 27 July 2026 - Corporate performance update and Q4 reporting](#)

Report sign off:

Minesh Patel

Corporate Director of Finance and Resources

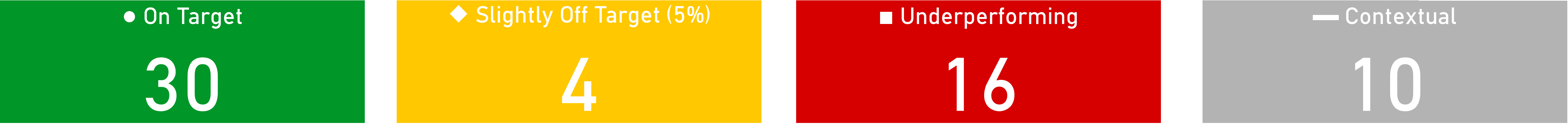
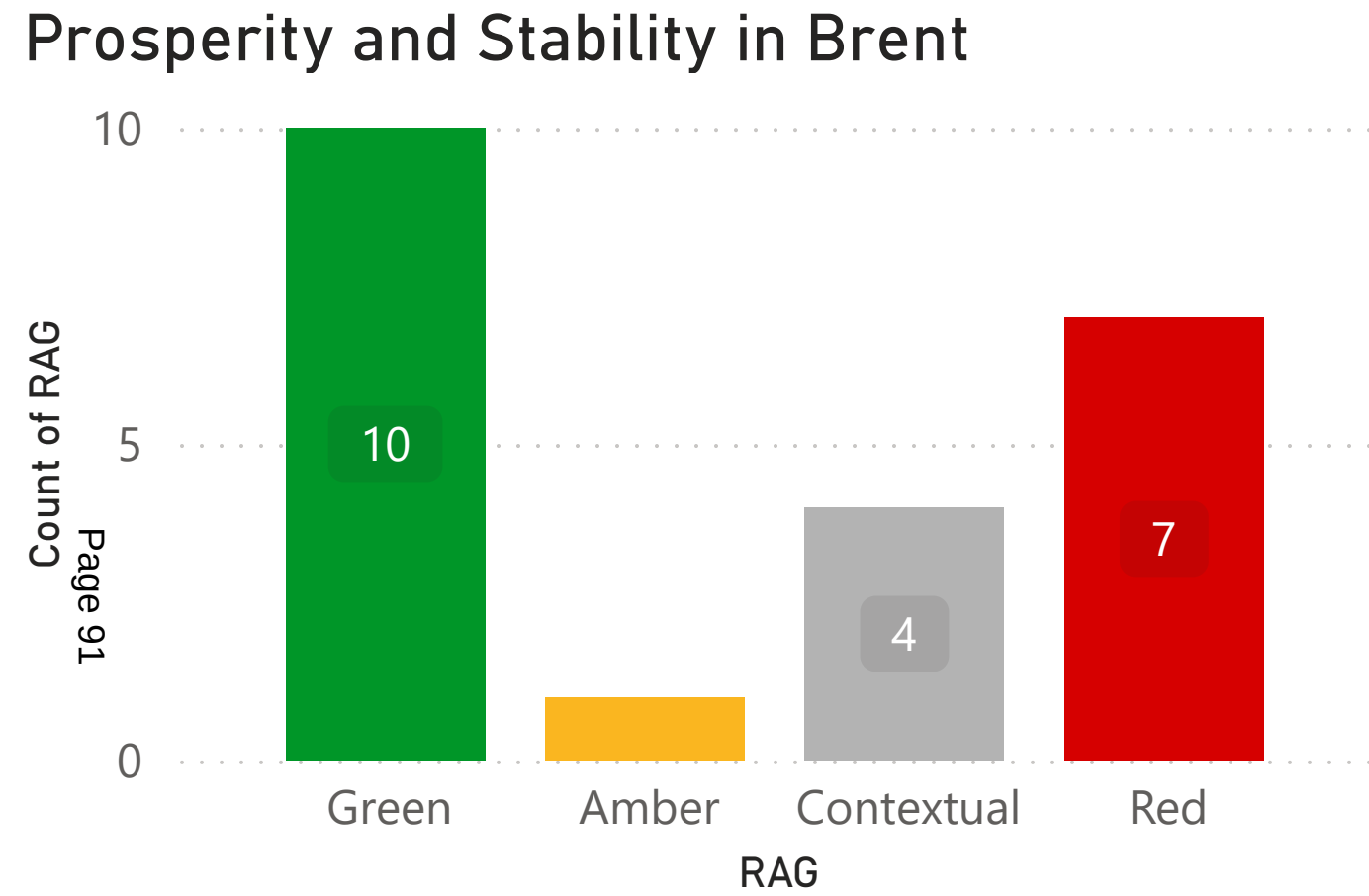
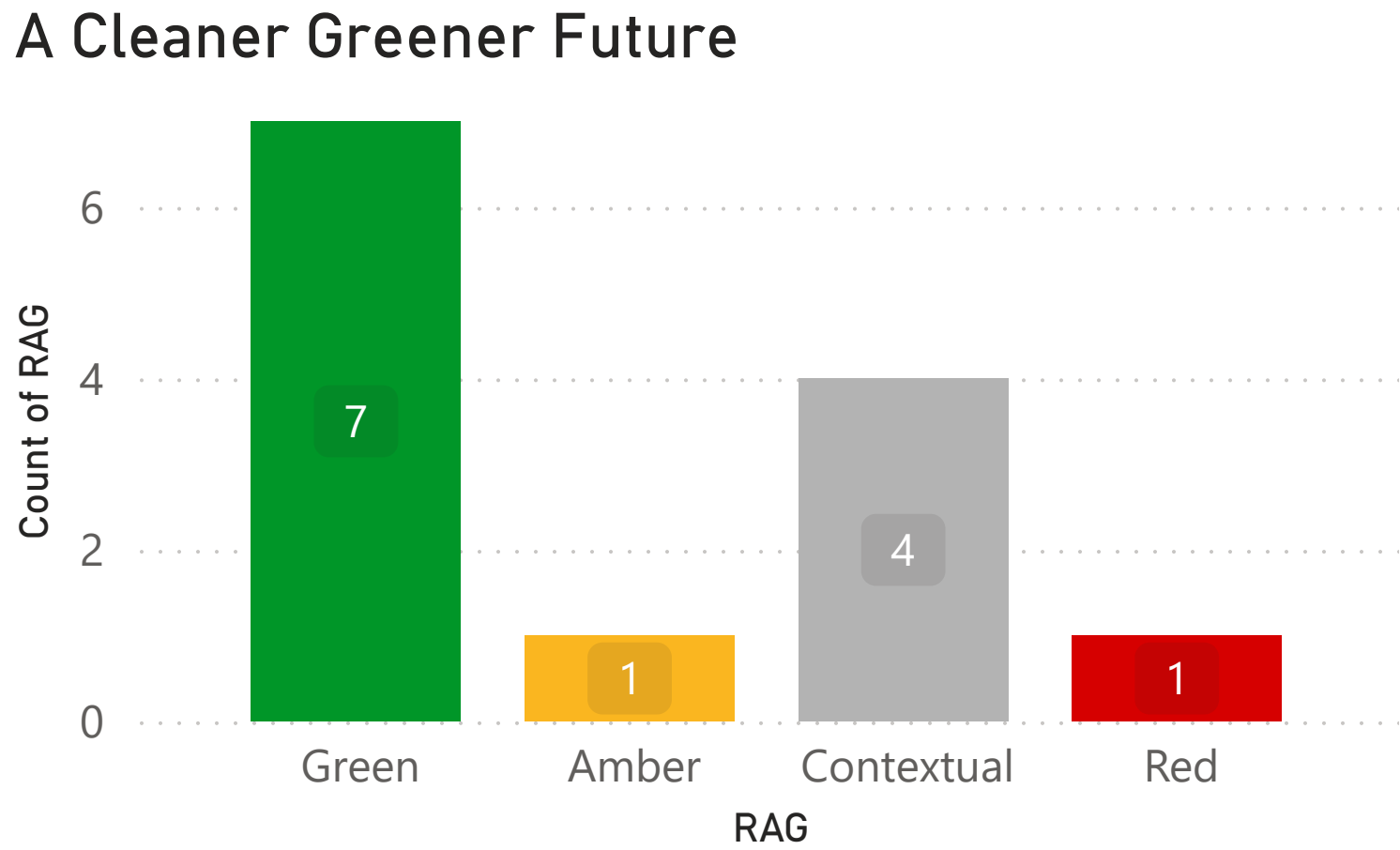
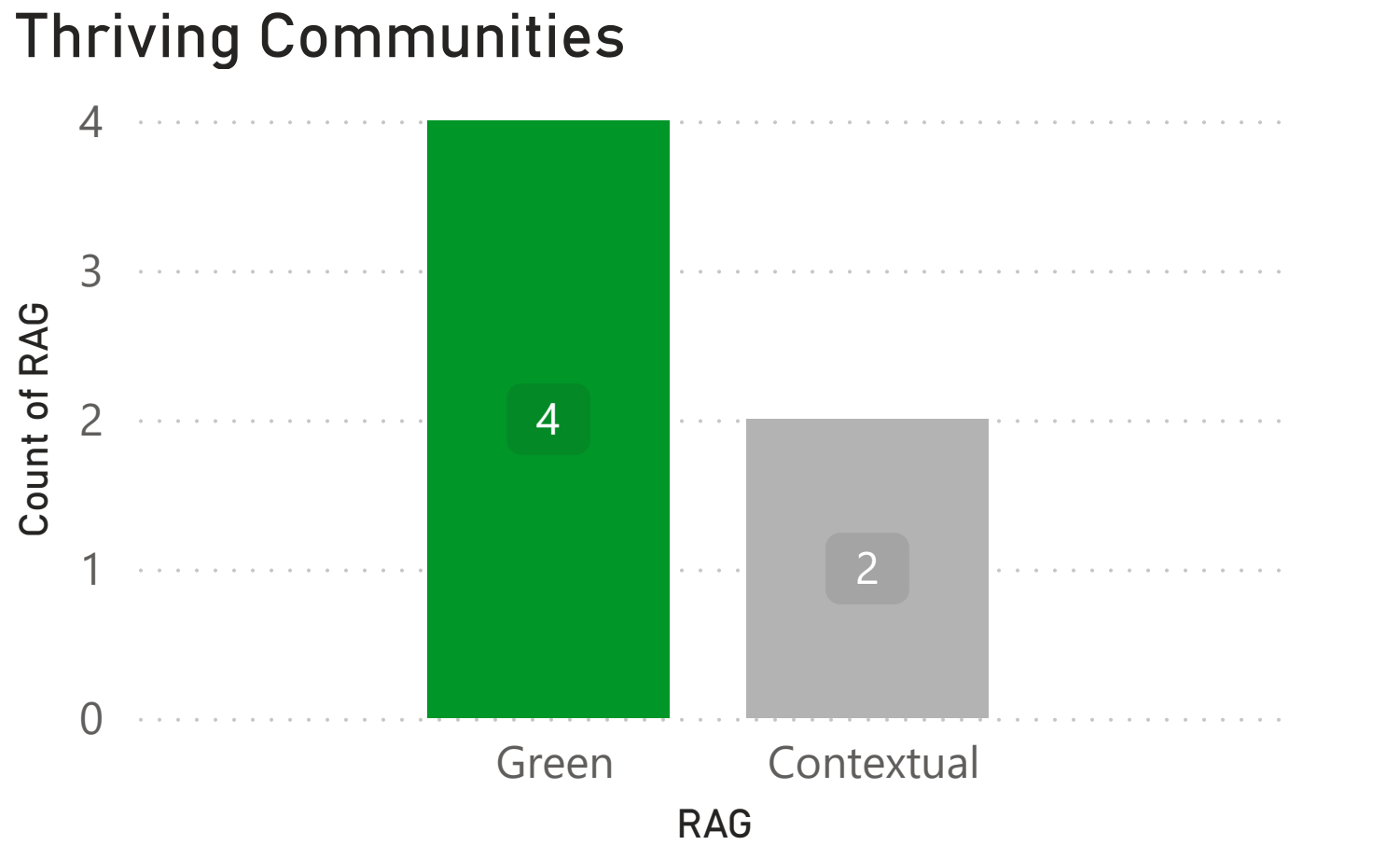
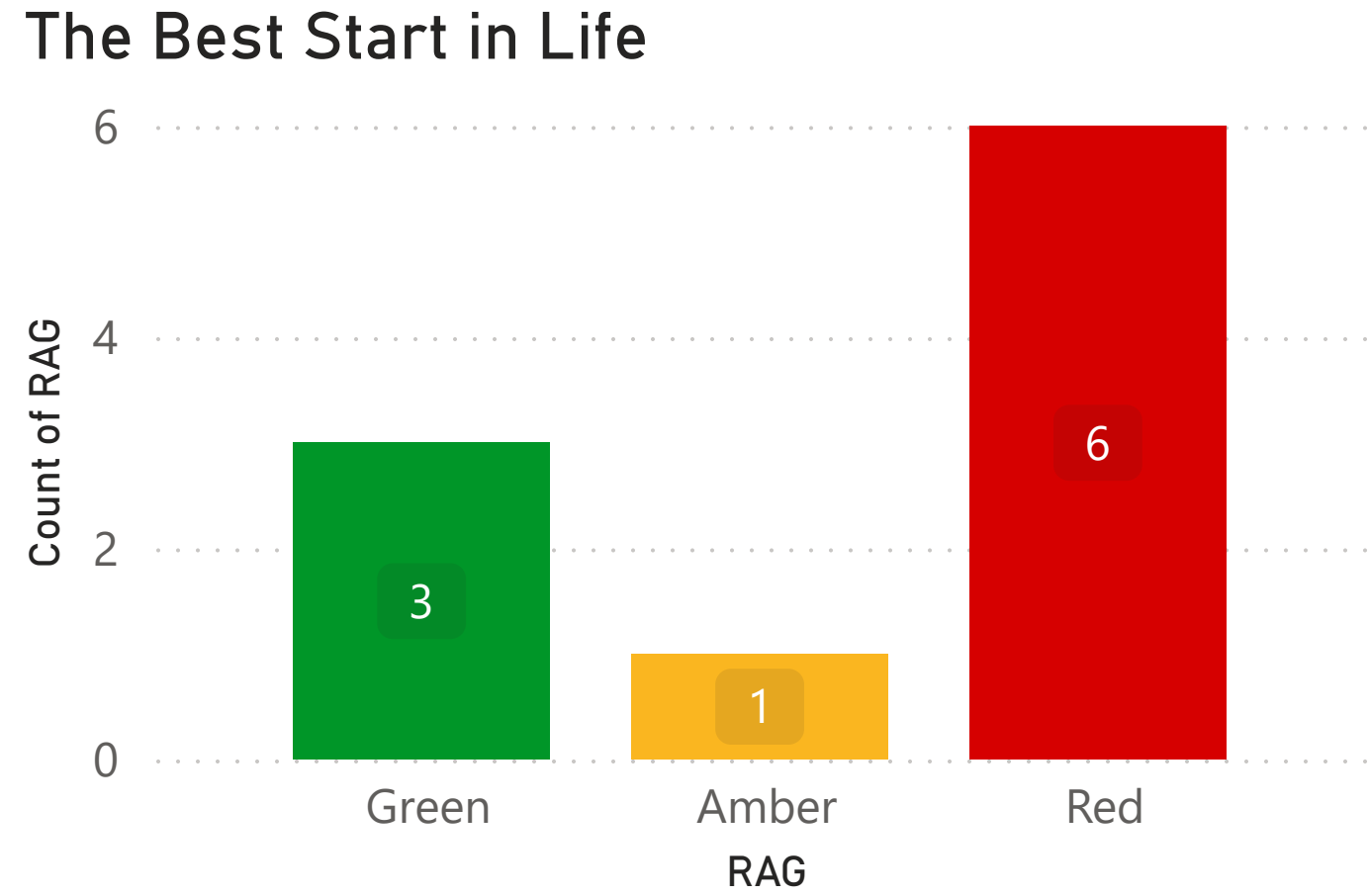
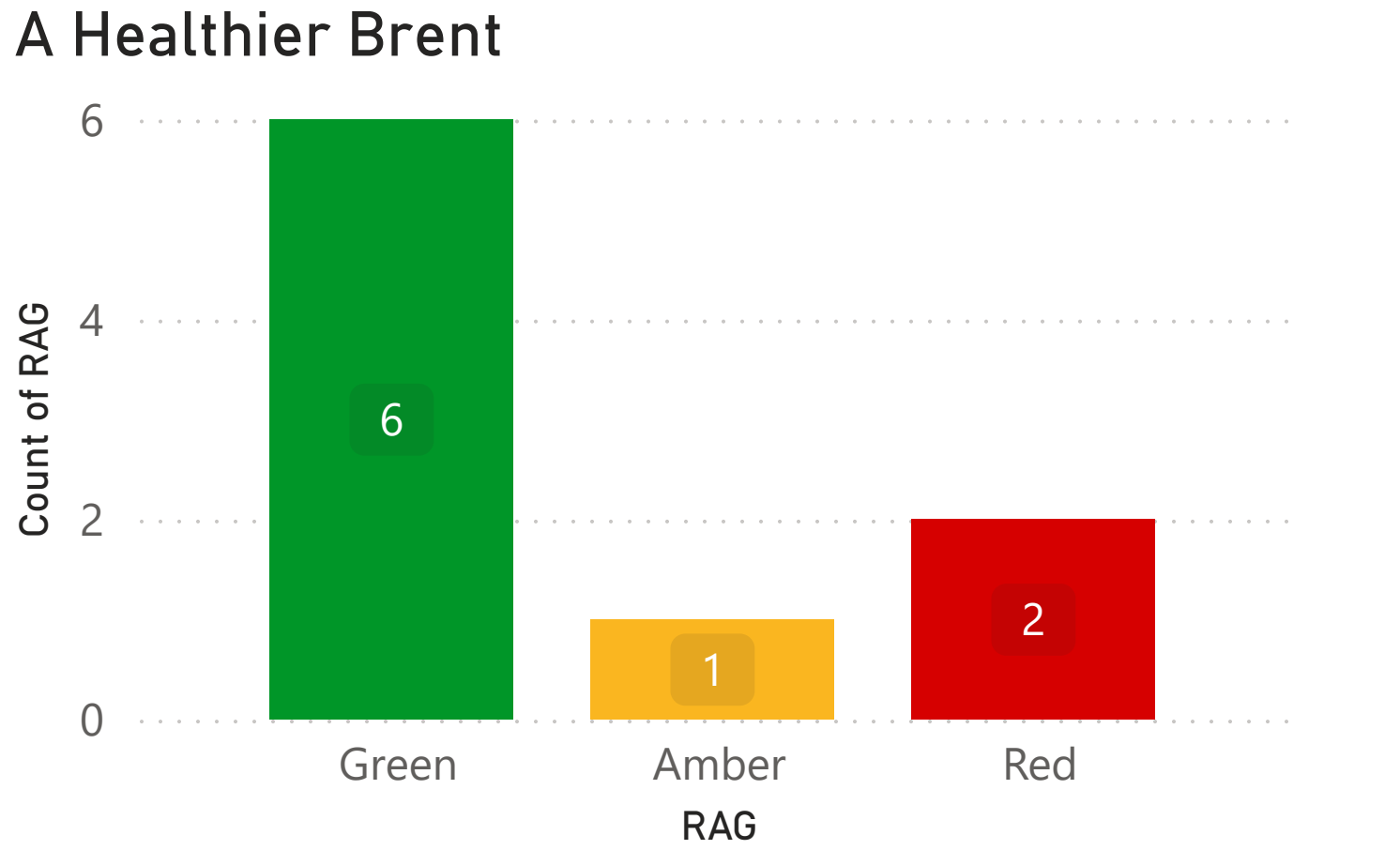
Legal considerations provided by:

Pameel Crowther-Newman (Interim Director of Law)

Finance considerations provided by:

Ravinder Jassar (Deputy Director Corporate and Financial Planning)

Borough Plan Performance Dashboard - June 2026



Key for Performance Rating

Unless otherwise defined, performance information is assessed using the following tolerances to give a RAG rating:

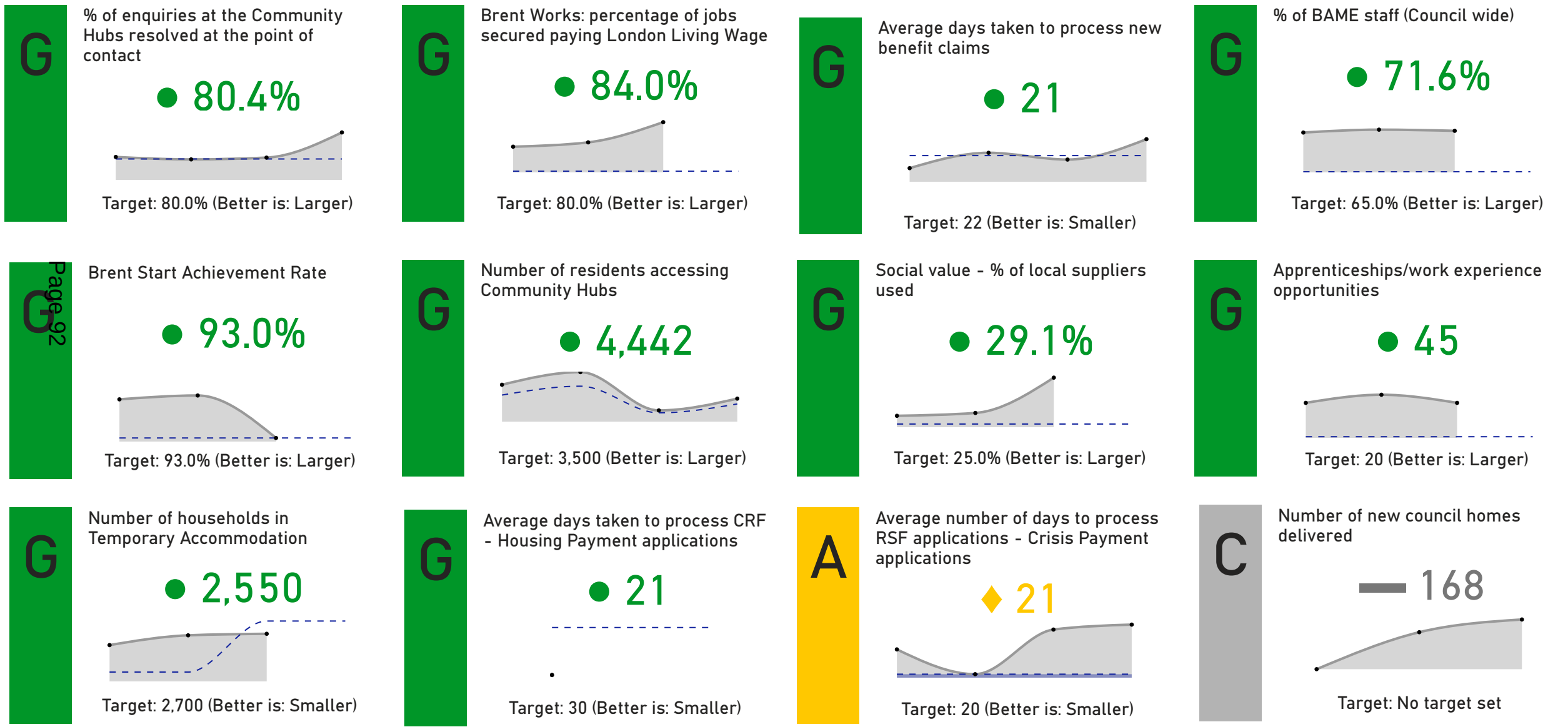
- **Green** – At target or exceeding target
- ◆ **Amber** – 0.01% - 5% outside target
- **Red** – Greater than 5% outside target,
- **Contextual** – No target set

— Performance

--- Target

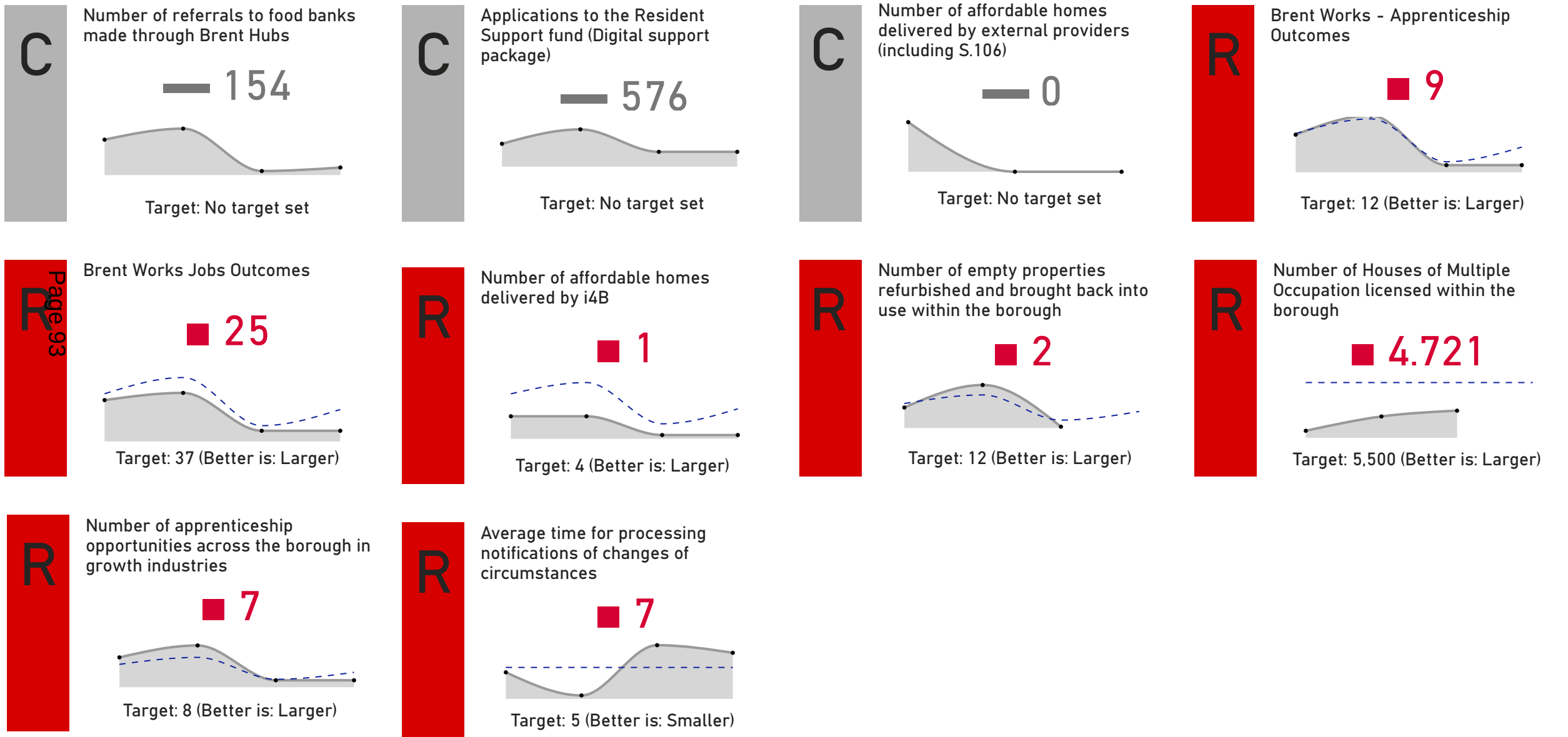
Borough Plan Performance Dashboard - June 2026

Prosperity and Stability in Brent



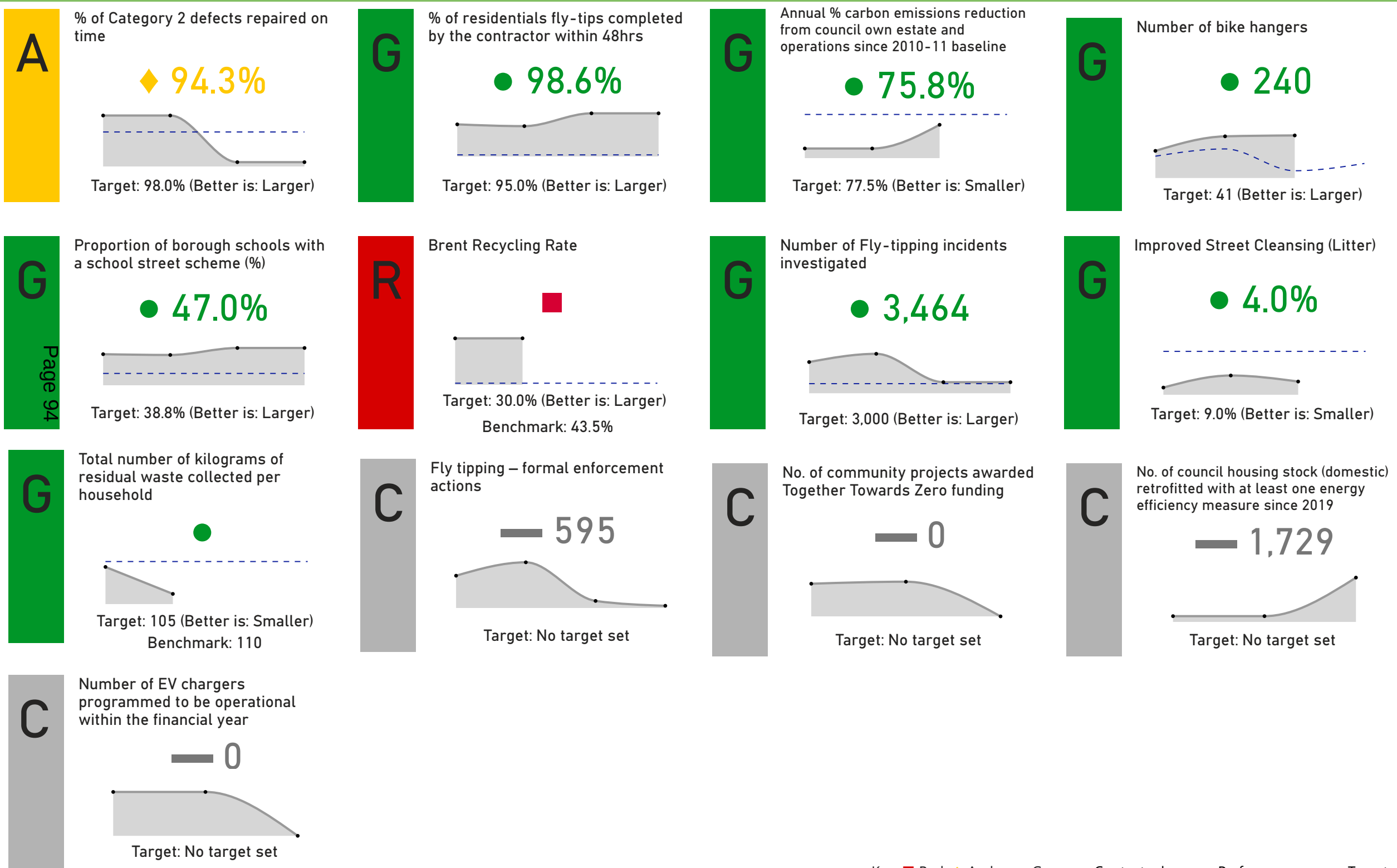
Borough Plan Performance Dashboard - June 2026

Prosperity and Stability in Brent



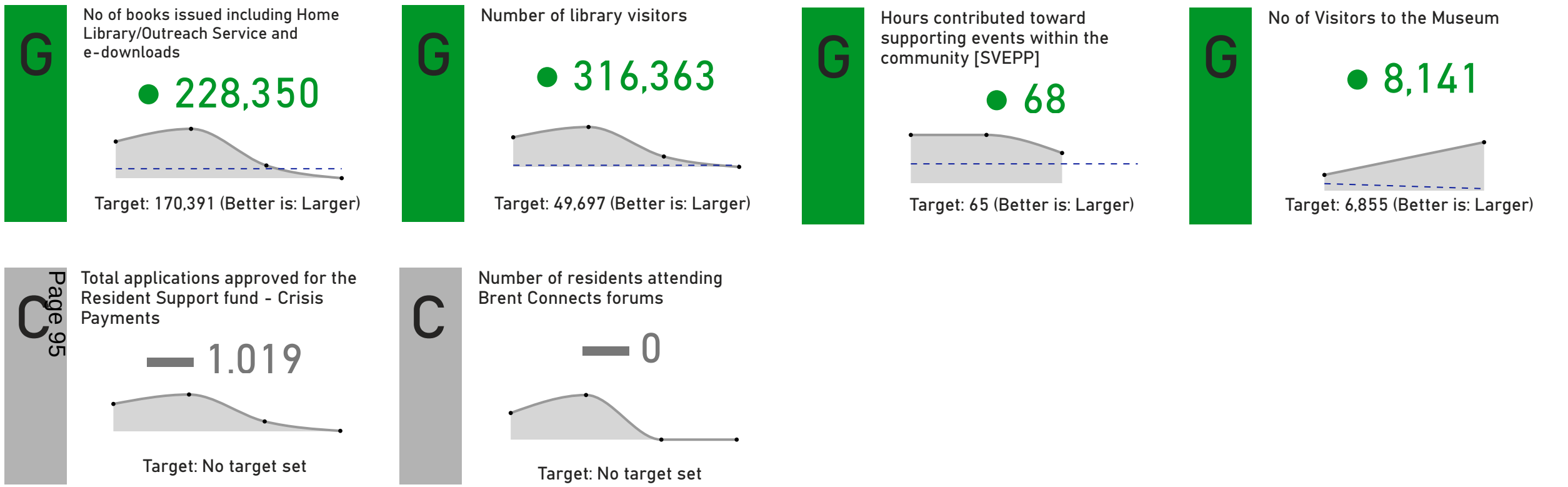
Borough Plan Performance Dashboard - June 2026

A Cleaner Greener Future



Borough Plan Performance Dashboard - June 2026

Thriving Communities



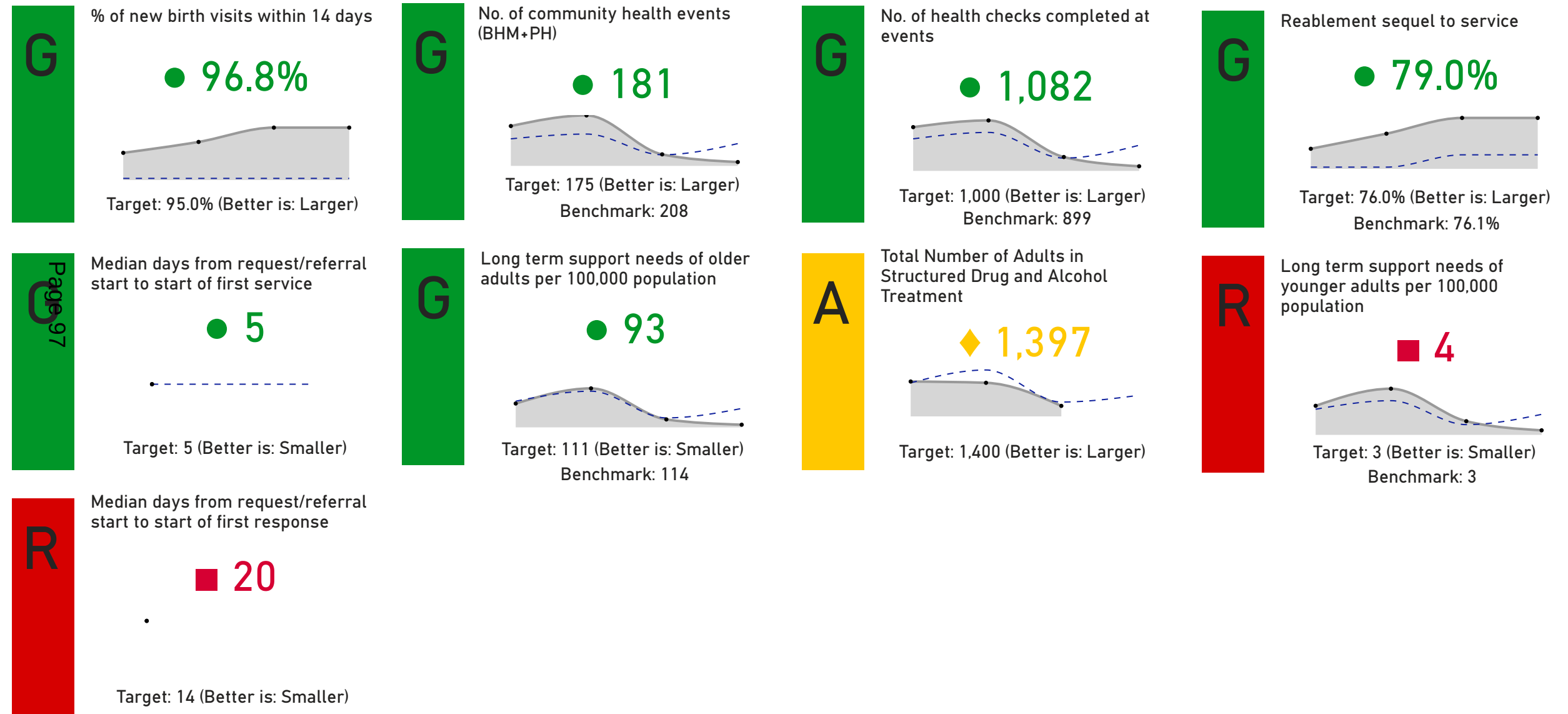
Borough Plan Performance Dashboard - June 2026

The Best Start in Life



Borough Plan Performance Dashboard - June 2026

A Healthier Brent



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Borough Plan Performance Dashboard – Navigation Guide

This dashboard provides a visual summary of performance against the Borough Plan priorities. It enables services, managers and members to monitor progress, identify areas of success, and take actions where improvement is needed.

Dashboard Structure: The dashboard contains

Page	Purpose
Summary Page	Overall performance position, total RAG ratings by priority
Prosperity & Stability	Detailed KPIs
A Cleaner Greener Future	Detailed KPIs
Thriving Communities	Detailed KPIs
The Best Start in Life	Detailed KPIs
A Healthier Brent	Detailed KPIs

Each priority page provides KPI performance, trend lines, targets, and RAG ratings.

Summary Page:

Summary display of Total KPIs by performance status

Page 100

Pages

Summary

Prosperity and stability in Brent (1/2)

Prosperity and stability in Brent (2/2)

A cleaner greener future

Thriving communities

The best start in life

A healthier Brent

Use the left-hand Pages panel to switch between Pages:

- Summary view
- Each Borough Plan priority

Borough Plan Performance Dashboard - September 2025

Q3

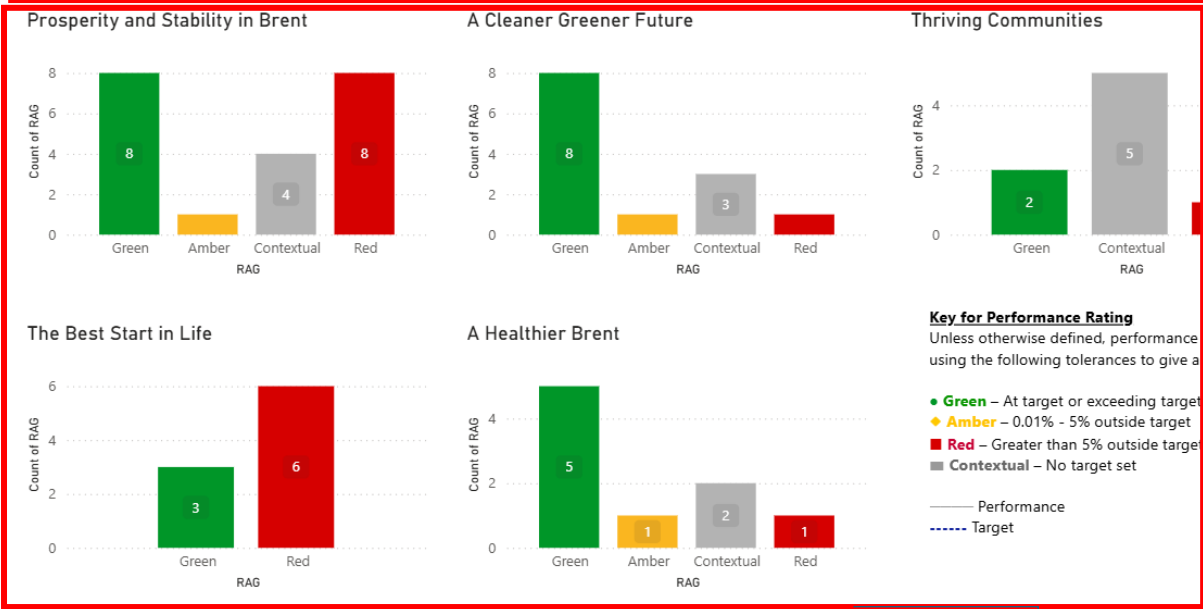
Q4

Q1

Q2

2024-25

2025-26



Select a Reporting Quarter

TIP: The highlighted tile shows the currently selected quarter.

RAG breakdown charts for each Borough Plan priority, showing Count of Green / Amber / Red / Contextual indicators

Quick performance status at a glance

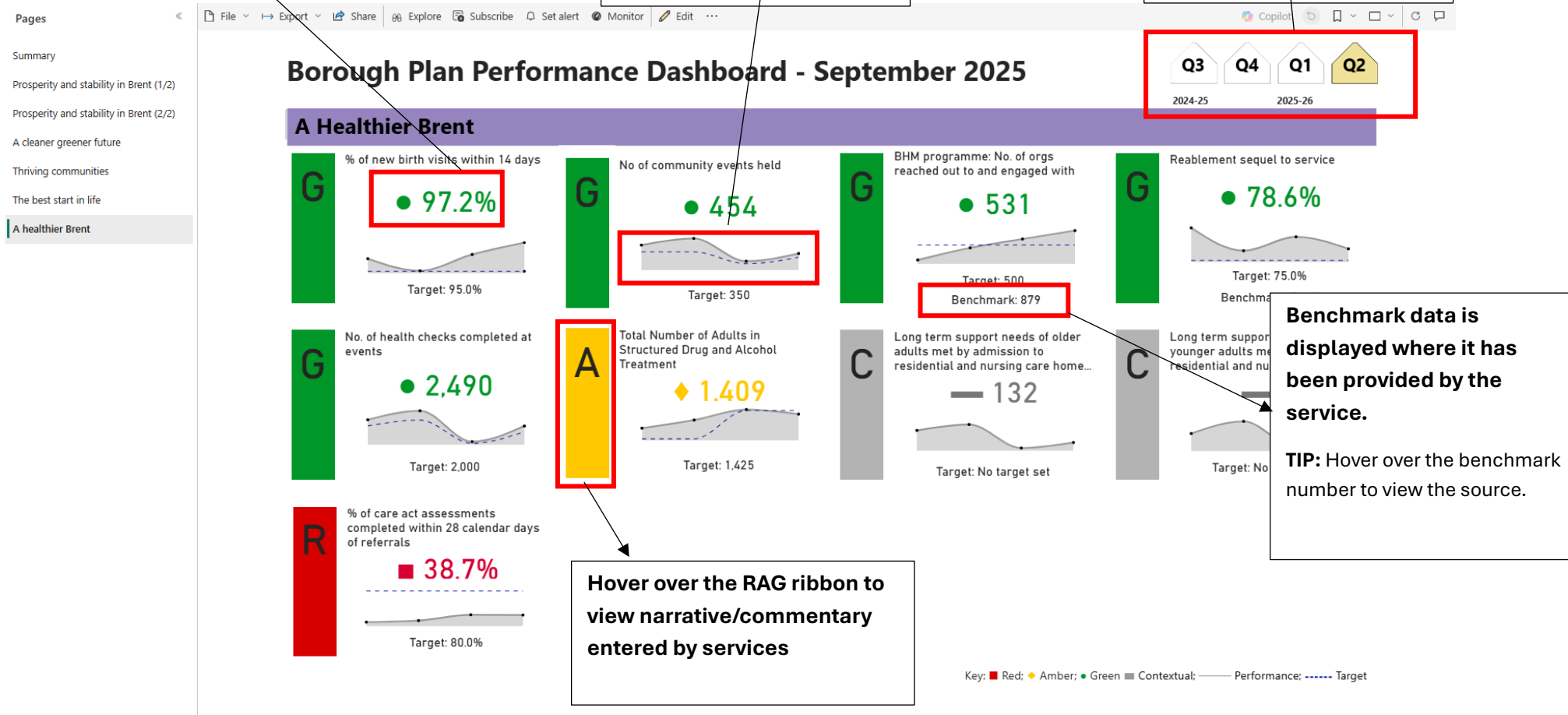
Borough Plan priority page:

Performance result for the selected quarter

Shows last 4 quarters of performance to highlight direction of travel

Select a Reporting Quarter

TIP: The highlighted tile shows the currently selected quarter.



Support: If you have questions or would like help interpreting the data, contact: corporate.performance@brent.gov.uk

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	Cabinet 9 November 2026
	Report from the Corporate Director Children, Young People and Community Development
	Lead Member – Cabinet Member for Children Services, Employment & Climate Action (Councillor Jake Rubin)
School Place Planning Strategy 2024 – 2028 Third Refresh	

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
List of Appendices:	One Appendix 1: Brent School Place Planning Strategy 2024 - 2028 3 rd Refresh November 2026
Background Papers:	N/A
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Shirley Parks, Director, Education, Partnerships and Strategy 020 8937 4259 Shirley.parks@brent.gov.uk Michelle Gwyther, Head of Forward Planning, Performance and Partnerships 020 8937 2499 Michelle.Gwyther@brent.gov.uk

1.0 Executive Summary

- 1.1. This report provides Cabinet with a third refresh of the School Place Planning Strategy 2024-2028, approved by Cabinet in October 2023 with refreshes approved by Cabinet in November 2024 and November 2025.

2.0 Recommendation(s)

That Cabinet:

- 2.1 Approves the third refresh of the School Place Planning Strategy 2024-2028, as provided in Appendix 1.
- 2.2 Notes the continued focus on planning to ensure both the sufficiency of places and the sustainability of schools, based on varying demand patterns across school planning areas in Brent.
- 2.3 Notes the early signs of a reversal of declining pupil numbers in some parts of the borough (resulting from a rising birth rate) and that a requirement to accommodate higher demand in some primary planning areas may be required in the future.
- 2.4 Notes there continues to be increasing demand for places that meet the needs of children and young people with SEND aged 0-25 and the intention to further develop the SEND estate capital investment programme as Brent's strategy to address this need, as set out in sections 4.3-4.5.
- 2.5 Notes the school place planning actions completed in the first two years of the strategy and the actions planned for the coming academic year as set out in Section 4 of this report.
- 2.6 Notes the update on the success measures set out in the original strategy in section 3.2 of this report.

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 The Brent School Place Planning Strategy 2024–2028 directly supports Strategic Priority 4 of the current Borough Plan: The Best Start in Life. Through proactive planning and delivery of sufficient and appropriate early years and school places, the Council fulfils its statutory responsibilities and enables all children and young people in Brent to access high-quality education within their local communities.
- 3.1.2 Approved by Cabinet in October 2023, the Brent School Place Planning Strategy 2024- 2028 Strategy sets out a clear framework of objectives and guiding principles to shape the Council's approach to school organisation up to 2028. It reflects a strategic response to demographic trends, including declining demand in some areas and projected growth in others. The Strategy prioritises both the sufficiency of school places and the long-term sustainability of Brent's education infrastructure, ensuring that provision remains responsive, equitable and financially viable across the borough.

3.2 Update on Success Measures

The Brent School Place Planning Strategy 2024-2028 sets the following success measures and the updated position is also provided:

- All Brent schools are good or outstanding (*as per applicable Ofsted gradings at the time*).

This was 95.3% at the end of the 2023/2024 academic year, 96.5% at the end of 2024/2025 academic year. In 2025/26 Ofsted changed the School Inspection Framework moving away from single word judgements, so this measure is no longer used. The new measure to be used is the percentage of schools rated as at the Expected Standard or higher in all Ofsted judgements.

- Children are able to access education close to home (under two miles for children under 8 and 3 miles for children up to Year 6; within 75 minutes travel time for secondary aged children).

This outcome measure was met in November 2023 and has remained unchanged in all subsequent strategy refreshes.

- Brent net exportation of secondary school pupils reduces over the duration of this strategy to 25% with a stretch target of below 25%.

The baseline was 25.8% for the commencing of the new strategy. This figure was 24.3% in 2024, 23.8% in 2025 and 24.5% in 2026, meaning the target continues to be met. Additionally, the net difference between Brent pupils being offered out of borough schools and out of borough pupils being offered Brent schools is the lowest since recording began (at -112 pupils).

- An increase in local SEND places in the borough will lead to a reduction in the use of out-of-borough placements and placements in independent non-maintained special schools.

The percentage of placement spend on the independent, non-maintained special schools (INMSS) (Lower is better) was 17.8% at the end of the 2025/26 financial year which is slightly lower than 18.8% at the end of the 2024/2025 financial year.

- The take-up rate of free childcare entitlements in the borough increases over the course of the strategy to 70% for two-year-olds and 80% for 3 and 4-year-olds.

The latest figures indicate take-up in Brent as of January 2026 for the two-year entitlement for low/no income families rose to 59.3%. This reflects an increase of 5.9% on the take up in 2025 and is below the London average of 66.8% which has also increased by almost 5.7% this year. The take up for 3 – 4 year olds was 77.5%. This is a decrease of 2.9% on the previous year (80.4%) and is lower than the London average. Brent remains ambitious in increasing the uptake of early years entitlements and the Strategy outlines steps to achieve this as part of Brent's Best Start in Life Programme. This includes a targeted promotional campaign that focuses

on the benefits of early education for shaping future life chances and how childcare can support parents into employment.

3.3 Background

- 3.3.1 The Brent School Place Planning Strategy 2024-2028 refresh provides the latest assessment of school place demand across the borough based on pupil projections from the Greater London Authority (GLA). The GLA population projection models are updated and revised annually as new methods or data become available, for example the 2021 national census, which ensures projections provide the best estimates of future population.
- 3.3.2. The GLA projections are informed by centrally held demographic data, such as the Office of National Statistics (ONS) census data and fertility and birth rates, as well as locally held information such as migration patterns and planned housing growth provided by the Local Authority. The methodology also takes account of the percentage of children who historically move into the following academic year in an area and are therefore driven by the number of pupils on roll in the January 2026 school census. The GLA projections also take into account changes in housing growth, so the impact of new housing developments in the borough and those just outside borough borders are reflected in the strategy.
- 3.3.3 A report in 2025 published by London Councils called 'Managing school places and admissions in London' <https://www.londoncouncils.gov.uk/news-and-press-releases/2025/managing-school-places-and-admissions-london-report> analysed the four year school places forecasts of all 33 London local authorities (from 2024) and revealed that a collective predicted drop of 3.6 per cent in demand for reception places and 2.9 per cent in Year 7 places. Some boroughs are predicting growth, but the large majority are forecasting cumulative drops in demand. London Council's followed this up in September 2026 with a new report called 'Finding the balance: the London education system's responses to falling pupil rolls' <https://www.londoncouncils.gov.uk/news-and-press-releases/2026/put-children-and-families-first-new-report-reveals-emotional-toll> which explores how boroughs, schools and their partners are responding to falling pupil numbers, and the lessons emerging from their work.
- 3.3.4. The principles of sufficiency and sustainability continue to underpin the refreshed School Place Planning Strategy 2024-2028. Primary schools with falling rolls are being supported through a number of measures as outlined in the strategy, including capping admission numbers, reducing Published Admission Numbers and establishing Additionally Resourced Provision for children with SEND in spare classrooms. The Strategy sets out that where there is unused school built capacity that lends itself to alternative use or vacant school sites, these will continue to be repurposed for educational use, with a focus on increasing the number of specialist school places for Brent children and young people. A school closure would only be considered when all other viable options have been exhausted and is deemed necessary to ensure the sustainability and effectiveness of educational provision in a given area.

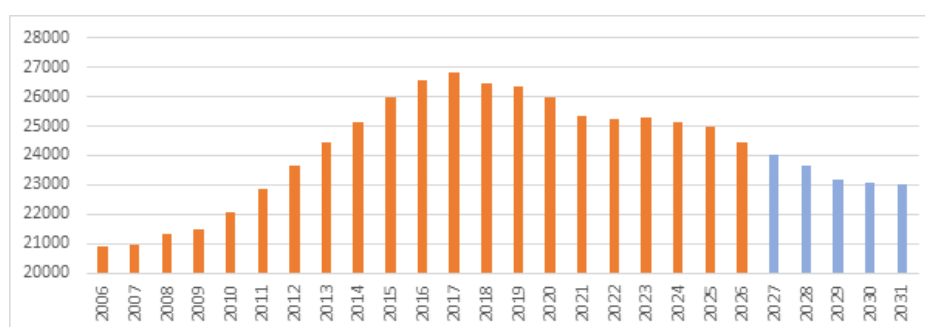
3.4 Early Years

- 3.4.1 The Community and Wellbeing Scrutiny Committee received a detailed report on 18 September 2024 titled 'Early years provision and progress towards meeting the expansion of childcare entitlements'. This report outlined Brent's progress in delivering expanded entitlements and deploying capital investment to support growth and sustainability across the sector. The Council is currently embarking on delivery of the 'Best Start in Life' local plan, working closely with partners to reach an increased target of more children achieving a Good Level of Development by the end of their Reception year.

3.5 Primary Place Need

- 3.5.1 Primary school demand has been reducing since September 2017. The latest GLA projections (based on the 2021 population census and the January 2026 school census) and which run to 2030/2031 (because for later years children have yet to be born), indicate demand at primary age across all years (Reception to Year 6) will continue to decrease over the next few years (Chart 1). This reduction in demand reflects a falling birth rate across London and in Brent. The number of births across Greater London fell from 134,037 in 2011/12 to 115,735 in 2019/20.

Chart 1: Brent Primary numbers on roll and projections as of January each year up to 2031



- 3.5.2. Borough-wide Brent has sufficient capacity to meet forecast demand for mainstream primary places and maintain a level of at least 5% spare places. This ensures the borough has the flexibility to respond effectively to in-year movement, migration or any unforeseen increases in demand.
- 3.5.3. However, the picture in Brent is not homogenous. One primary planning area (Planning Area 3) is expected to experience a significant increase in demand linked to the two major growth areas of Wembley Central and Alperton. In contrast, sustained low demand in three areas (Planning Areas 2, 4 and 6) is reflected in a substantial surplus of capacity. Some schools that have spare places in Planning Areas 2 and 4 will help to support meet the rising demand in Planning Area 3.
- 3.5.4 While lower demand means parents have an increased choice of places in some parts of the borough, reduced pupil numbers present organisational and

financial challenges for schools. Falling primary demand means that some schools in Brent are operating as one form of entry when they have the built capacity for two or more, as is the case in many other London authorities, and this trend is likely to continue for so long as pupil demand remains low. The key issue for schools experiencing falling rolls is the direct impact on school budgets, as school funding via the Dedicated Schools Grant (DSG) is driven by pupil numbers, although overheads remain the same with no economy of scale. The impact of falling rolls becomes particularly acute for small schools, that while valued for their size and family feel, can face systemic structural, financial and pedagogical constraints that risk negatively impacting the overall quality of education.

- 3.5.5 Over the past few years, the Local Authority has been working with individual schools to manage changing demand and to support schools to ensure the sustainability of local provision. Measures include temporarily reducing admission numbers or placing an informal cap on admission numbers in specific year groups in schools. A more recent strategy, where appropriate, has been to repurpose some spare built capacity to provide Additionally Resourced Provision (ARP) places for children with Special Educational Needs and Disability (SEND).
- 3.5.6. The sustained reduction in primary demand and the resulting level of spare places in Planning Areas 2, 4 and 6, alongside limited spare capacity in another planning area, means individual measures are no longer an adequate response. The third refresh of the Strategy outlines a range of proactive and coordinated options and identifies planning areas where further interventions are required.
- 3.5.7 There are approximately 31 spare classes in Reception in the 2026/27 academic year (22.4% of Reception capacity). While the birth rate in Brent declined from 5139 in 2014/15 to 4363 in 2023/24, it showed an increase in 2024/25 to 4499. The related increase in the Reception forecast when this cohort starts school in 2029/30 is however relatively low (an increase of 114 children, the equivalent of 4 Reception classes). While longer term forecasting, which is less reliable, indicates Reception demand will rise after 2032/2033, this demand will not be evenly distributed, and some planning areas are likely to retain high numbers of surplus places. This means action will still need to be undertaken in these areas, while ensuring the sufficiency of places to meet any sustained future demand.

3.6 Secondary Place Need

- 3.6.1 The latest GLA secondary forecasts project a continuation of falling demand for Year 7 places, and there will be sufficient capacity to meet this forecast demand. However, the latest projections indicate the level of surplus capacity across the borough may fall below the target of 5% in some higher year groups from 2027/2028. (Secondary forecasts are for a longer timescale than primary, as they are more reliable because they are based on the numbers of children already attending nursery or primary school).

- 3.6.2 A key challenge is in-year demand for secondary places which is expected to remain high in some planning areas and year groups, especially Year 11. This increased demand is caused by inward migration to the borough and population mobility levels. Brent will continue to work with secondary schools to ensure in-year demand can be met. However secondary schools cannot swiftly increase teaching capacity even if they have the building capacity to do so, and to increase pupil numbers takes time. Where necessary, Fair Access Protocols are being and will continue to be employed to place children who are out of school and who have not been offered a school within 4 weeks of their application.

3.7 Special Educational Needs and Disability (SEND) and Alternative Provision Need

- 3.7.1 Brent is a borough that has high aspirations for all children and young people with special educational needs and disabilities (SEND). This was recognised by Ofsted during Brent's SEND Area Inspection in January 2025:

"Leaders across the partnership understand very well the needs of children and young people with SEND and their families. They have high ambitions and a relentless focus to continue to improve services for children and young people who have SEND".

- 3.7.2 As of August 2026, there were 4408 children and young people living in Brent aged 0-25 with an Education, Health and Care Plan (EHCP). Of these, 2908 are statutory school age, or 6.1% of the school population (similar to national levels, which currently sit at 6%). 13.3% of pupils are identified with additional needs that can be met at SEN support where a need is identified but does not meet threshold for an EHCP (compared to 14.8% nationally).
- 3.7.3 Ongoing targeted work to support schools and settings to better meet the needs of children with SEND has seen an increase in the number of children remaining within mainstream education in Brent. However, despite increasing confidence in the mainstream sector to meet the needs of children and young people with SEND, and significant investment by Brent to increase the capacity within special educational settings and ARPs in the borough, additional special school places are required.
- 3.7.4 There are currently 225 children in mainstream schools awaiting a place in special (an increase of 49% since this time last year). Of these 225, 198 are primary age and 27 are secondary age. Additionally, Brent currently has 22 children unplaced and receiving home tuition whilst a placement is sought (a 32% increase since this time last year). In addition, the number of children educated in independent special schools at higher cost than local mainstream provision has increased by 9% (placing pressure on the High Needs Block and General Fund School Transport budgets). Furthermore, despite the new government SEND Reforms, the number of children with an EHCP requiring specialist provision is expected to continue to grow. Further expansion of local provision is therefore essential.

4.0 School place planning strategy actions undertaken and planned

4.1. A number of actions have been completed that support Brent's School Place Planning Strategy to provide both sufficiency and sustainability of mainstream school places.

- Carlton Vale Infant School and Kilburn Park Junior School joined together in a hard federation in April 2024 and have recently undertaken an informal consultation proposing that the schools amalgamate as a single school on one site as part of the South Kilburn Regeneration Programme. The outcome of this consultation will be report to Cabinet in due course.
- Following Cabinet's decision in May 2024 to proceed with the closure of the Gwenneth Rickus site of Leopold Primary School, the LA continues to provide support for the school to plan for the phased closure of the Gwenneth Rickus site in July 2027.
- Formal amalgamation of Malorees Infant and Malorees Junior Schools took place in April 2026 to form Malorees Primary School.
- A transition group is in place to support the relocation of Islamia Primary School to the Gwenneth Rickus building in September 2027 following the school's eviction from its current site. This secures the long-term future of the school and will provide improved facilities for its pupils.
- Following informal consultation, formal consultation is currently being undertaken on the proposal for Roe Green Infant and Junior Schools to amalgamate, the outcome of which will be reported to Cabinet in due course.

4.2 Addressing the sufficiency of local places for Brent children with SEND of both primary and secondary age, and for the 16-25 age group is a Council priority. Brent Council has committed investment of over £53m since 2022 to develop additional specialist places across mainstream and specialist provision, including a new secondary special school that occupied brand new premises in September 2025, and a Post-16 Skills Resource Centre for young people with SEND projected to open in September 2027.

4.3 In delivering these programmes, Brent has delivered a 12% increase in special school places in the 2025/26 academic year. Table 1 below details the planned expansion of special school places in Brent 2025-2027, subject to relevant consultations.

Table 1: Additional special school provision for Brent 2025-2027

School	Places	Phase	Delivery time scale
Woodfield school	40	Secondary	January 2027
The Avenue	34	All-through	September 2027
Strathcona site	50	Primary	September 2026
The Manor School	88	Primary	September 2026
The Village School	80 (but net gain of 40)	All-through (but places are for secondary)	TBC (modelled for delivery 2028)
Total	212 (138 primary, 74 secondary)		

- 4.4 This overall growth demonstrates the positive impact of the SEND Capital Programme. The increase in capacity not only supports Brent's commitment to inclusive education but also ensures that children and young people with complex needs can access high-quality, tailored support closer to home. A third phase of the SEND Capital programme is in development is likely to propose a significant expansion of 100-120 places in additionally resourced provision alongside the development of an 80-100 place special school that could also act as a centre of excellence for training and staff development to support inclusive practice in Brent's mainstream schools. The aim is to use spare capacity in the local mainstream sector as a result of falling school rolls to meet this need.

5.0 Stakeholder and ward member consultation and engagement

- 5.1 Relevant ward members will be kept informed of actions taken under this Strategy particularly where mainstream planning area capacity is reviewed and where additional specialist provision is under consideration.
- 5.2 The Lead Member has been and will continue to be regularly briefed on school place planning issues and associated actions.
- 5.3 School representatives have been and will continue to be actively involved school place planning discussions which affect their own establishment.
- 5.4 Any proposed changes to provision will be subject to public consultation with parents and key stakeholders in line with statutory guidance and legal frameworks.

6.0 Financial Considerations

- 6.1 Mainstream school places are funded from the annual Dedicated School Grant (DSG) based on pupil numbers as per the October school census in the preceding year. This means that, although there is a time lag, the revenue cost of mainstream pupil growth is recognised and funded by the DfE.

- 6.2 School budgets are devolved to respective school governing boards, but are under pressure due to rising cost of inflation and falling rolls. As schools are funded on the basis of pupil numbers, it is likely small schools and those with falling numbers on roll will find it most difficult to balance their budgets. Larger schools are more likely to successfully manage the impact of these pressures.
- 6.3 Expanding funded High Needs provision will have revenue implications, as it is funded from the High Needs Block of the DSG. In order to help manage the financial pressure on the High Needs Block, new in-borough provision must replace current out-of-borough arrangements at a lower cost. Reducing out-of-borough provision will also help mitigate the financial pressure on the transport budgets held in the General Fund to transport children and young people to out-of-borough provisions.
- 6.4 Basic Need Capital Grant and the Special School Capital Grant are not time-bound or ring-fenced and can be used for any capital purpose. However, the Department for Education expects this funding to be used for investment in schools, joining up with other capital resources when it is beneficial to do so.
- 6.5 The development of additional places for children and young people with SEND presents greater complexity and higher associated costs than mainstream primary school expansions. These increased costs are influenced by the nature of the construction required, the specific needs of the cohort of children and the constraints of site location and layout. As and when proposals to meet the forecast SEND demand need to be brought forward, further reports will be submitted to Cabinet, accompanied by financial information to support informed decision-making.

7.0 Legal Considerations

- 7.1 The Council has a general statutory duty under Education Legislation to ensure there are sufficient school places available to meet the needs of the population in its area. The Council must promote high educational standards, ensure fair access to educational opportunity and promote the fulfilment of every child's educational potential and increase parental choice. To discharge this duty, the Council has to undertake a planning function to ensure the supply of school places balances the demand for them. (Section 13 and 14, Education Act 1996) and (Education and Inspections Act 2006).
- 7.2 In addition to securing school places for pupils aged five to 16, the local authority has related statutory responsibilities in relation to children and young people with special educational needs and disabilities (SEND) up to the age of 25, where the Council has to make suitable provision to meet their needs and early years provision pursuant to the Children and Families Act 2014. The Council has responsibility for childcare sufficiency for provision for children aged 9 months to 5 years from September 2025 and ensuring it overlaps coherently with school provision.
- 7.3 The Council has additional statutory duties under section 19 of the Education Act 1996 to provide education for pupils needing alternative education.

- 7.4 As a contingency to support the admission to school of children as quickly as possible, the In Year Fair Access Protocol allows for the admission of children over schools' planned admission numbers in the event a school place is not available. Schools are not required to maintain classes over the planned admission number (PAN) but revert to the usual admission number when children leave.
- 7.5 Statutory processes should be followed for any proposed enlargement of the school premises that would increase the capacity of the school by both more than 30 pupils and 25 per cent or 200 pupils (whichever is the lesser).
- 7.6 Statutory processes should be followed for the reduction or removal of capacity from any school. These processes are set out in the School Admissions Code 2021 for the reduction of a school's Published Admission Number and in the statutory guidance 'Making significant changes ('prescribed alterations') to maintained schools August 2025'.

8.0 Equity, Diversity & Inclusion (EDI) Considerations

- 8.1 Under Section 149 of the Equality Act 2010, the Council has a duty when exercising its public functions to have 'due regard' to the need to eliminate discrimination harassment and victimisation and other conduct prohibited under the Act; advance equality of opportunity and foster good relations between those who share a "protected characteristic" and those who do not. This duty is known as the public sector equality duty (PSED). The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, sex, and sexual orientation. All providers commissioned to deliver public services on behalf of or in partnership with Brent Council are required to comply with the PSED and the Council's Equality and Diversity policies.
- 8.2 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.
- 8.3 There is no prescribed manner in which the Council must exercise its public sector equality duty but having an adequate evidence base for its decision is necessary.
- 8.4 The School Place Planning Strategy 2024-28 aims to ensure there are sufficient, sustainable and suitable school places for all Brent children, and their diverse and changing needs are met including those with special education needs. It also aims to raise the education standards for all and address inequality due to social disadvantage, disability (including multiple complex needs) and/or other protected characteristics and contributes to the delivery of the Council's equality duties.

- 8.5 The findings and the equality analysis screening of the School Place Planning Strategy 2024-28 show a slowdown in demand for primary school places and a falling demand for secondary school places. Demand for places for children and young people with SEND in the borough is increasing and the strategy identifies the need for additional local places to meet their needs.

9.0 Climate Change and Environmental Considerations

- 9.1 The strategy sets an expectation for the school estate to be used efficiently to provide for current and future educational needs. The approach of sustainability and utilising the school estate for other educational provision reduces the use of construction materials and waste production and encourages efficiency in the use of existing resources.
- 9.2 The strategy sets out the need to create additional capacity for SEND provision in Brent reducing the need for children to travel outside of the borough to receive their education. Travelling shorter distances closer to home will reduce emissions and reduce air pollutants from private cars, minibuses and taxis.

10.0 Human Resources/Property Considerations

- 10.1 Through delivering the strategy there could be some changes to the current use of school capacity, for example an increase in SEND provision through utilising existing spare capacity in the mainstream primary school estate.
- 10.2 School reorganisation proposals that reduce capacity across the school estate could impact on school staff. This could have the potential effect of the need to consider redundancies.

11.0 Communication Considerations

- 11.1 Any proposed changes to provision would be subject to public consultation with parents and stakeholders in accordance with statutory guidance, legal frameworks and the Council community engagement process.

Report sign off:

Corporate Nigel Chapman

Corporate Director Children, Young People & Community Development

Legal considerations provided by:
Ovril Tomlinson, Senior Lawyer

Finance considerations provided by:
Folake Olufeko, Head of CYP Finance

London Borough of Brent School Place Planning Strategy

2024 – 2028

3rd Refresh – November 2026

*Working in partnership with schools in Brent to ensure
the sustainability and sufficiency of school places*



Brent

London Borough of Brent
School Place Planning Strategy 2024 – 2028
3rd Refresh

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1. Introduction

Brent Council is focused on equipping Brent children and young people for the future. The Borough Plan 2023 – 2027 sets out the Council's current priority to support young people to achieve the best start in life and receive the support they need when they need it. Working with schools and partners we will make sure access to education is fair and equal, and our children and young people receive a quality education which develops their skills and enables them to realise their aspirations.

Brent Council holds the statutory duty to ensure sufficient school places for Brent children (Education Act 1996, Section 14). This strategy sets out how Brent will deliver sufficient school places in the context of these statutory duties, ensuring school place planning delivers the best quality of education provision and achievement of the best outcomes for Brent children.

The Brent School Place Planning Strategy 2024-28 sets out the Council's priorities and the principles that underpin the Council's approach to school organisation. The focus is to ensure there is sufficient capacity to meet demand for all pupils who require a place, while also maintaining the sustainability of provision where schools may be experiencing falling demand. For the purposes of school place planning, the borough is split into six primary and three secondary school planning areas. This strategy provides the likely demand in each planning area, alongside details about the measures available or necessary to support areas experiencing falling demand or under pressure for more places.

The strategy was first published in October 2023 and will receive an annual refresh update each autumn term until November 2027. This is to ensure any new factors that impact on pupil forecasts are considered and refine the Council's understanding of future need. This edition is the third refresh, and it highlights recent changes in school capacity and demand, and a continued need to address the sufficiency of local places for Brent children with Special Educational Needs and Disabilities (SEND) in both primary and secondary age ranges.

1.1 The Brent Context

Brent is one of the most culturally diverse areas in England. The dynamic mix of communities continues to enrich and inform the social, economic and cultural make-up of the borough. The largest defined ethnic groups of compulsory school in Brent age are: Indian (18.7%), White British (9.2%), White Eastern European (6.1%), Black Somali (5.9%), Black Caribbean (3.8%), Pakistani (3.5%) and Afghan (2.8%). Undefined ethnic groups include Other ethnic group (3.8%), Arab other (3.3%), White Other (3.0%) and Other Asian (3.0%) (*Source: January 2026 School Census*).

In addition to new arrivals, the socio-economic pressures placed on many of Brent's families from both Brexit and the Covid-19 pandemic, together with increasing housing costs, a shortage of affordable housing and rising levels of homelessness contribute to relatively high levels of pupil turnover in many of our schools. The proportion of Brent pupils in primary and secondary schools classed as disadvantaged is 27.8% (2025/26), slightly above the national figure of 27.7% but below the London average of 31.3% (based on deprivation pupil premium

allocations). A cross-Council working group oversees the auto enrolment of primary and secondary aged Brent resident pupils attending Brent schools who are eligible for Free School Meals but are not accessing this support. Together with the expanded criteria of eligibility for FSM arrangements (which offers FSM to children from all families in receipt of Universal Credit regardless of income), this has helped maximise access to support for eligible families and contributed to an increase in FSM registration across Brent schools.

1.2 School Effectiveness

Over the last seven years, Brent's self-improving system has become firmly embedded in the borough, with a shared responsibility for school effectiveness and improvement between the Local Authority and schools.

There are 88 state schools in Brent. This includes 4 Nursery Schools, 2 all-through schools, 59 primary schools, 14 secondary schools, 6 special schools, 2 Pupil Referral Units and 1 Alternative Provision School.

The quality of education provision in the borough is high, as demonstrated by both the proportion of schools judged as either good or outstanding by Ofsted under the previous Ofsted framework (96.5% at the end of 2025/26 where the single word judgement still applied) and those judged as meeting the required standards under the current Ofsted framework.

In September 2026, Brent's Strategic School Effectiveness Partnership Board approved a revised 'Strategic Framework for School Effectiveness in Brent 2026-2030'. The Framework sets the following priorities which will be supported by the delivery of this Place Planning Strategy:

- Improving education provision so that Ofsted evaluations meet or exceed expected standards across all areas.
- Raising the attainment and achievement of vulnerable children and priority groups to reduce disparities in educational outcomes.
- Strengthening inclusive practice and improving outcomes for children and young people with SEND and other additional needs.
- Promoting pupil wellbeing, attendance and mental health as key enablers of educational success.
- Strengthening school governance so that governing boards provide effective support, challenge and strategic oversight.
- Building leadership capacity across the borough, including the development and succession of current and future leaders.
- Embedding anti-racist and equitable practice throughout Brent's education system.
- Developing a collaborative, self-improving school system through partnership and shared expertise

2. Background Summary

The Education Act 1996 requires that local authorities shall secure sufficient school places to provide primary and secondary education in their area. In exercising this duty, local authorities should have a view to securing diversity in the provision of schools and increasing opportunities for parental choice.

Brent Council has overarching responsibilities for school admissions in the borough, co-ordinating admissions at Reception, Year 3 (transition from infant to junior school) and at secondary transfer in Year 7. This is as well as processing in-year admissions and ensuring a school place is offered for any child not already on roll at a suitable school.

In addition to securing school places for pupils aged 5 to 16, Brent Council has related statutory responsibilities in relation to:

- **Children and young people with special educational needs and disabilities (SEND)** where the Council has to make suitable provision to meet their needs
- **Early years provision**, where the Council has responsibility for childcare sufficiency and for children aged nine months to statutory school age
- **Post-16 education and training** where the Council leads the local 16 to 19 partnership and takes overall responsibility for the sufficiency and suitability of provision, so all young people can stay in education or training until at least their 18th birthday.

Brent Council works with schools and multi-academy trusts to deliver its statutory duties, as well as local trusts and Dioceses, and the Department for Education Regional Director where this involves academies.

Planning for places for children in Brent falls under these five separate strands.

- Childcare and early years provision
- Mainstream primary school provision
- Mainstream secondary school provision
- Post-16 provision
- SEND places and Alternative Provision

2.1 Childcare and Early Years Provision

Alongside the statutory duty to provide school places, Brent Council has a duty to secure sufficient childcare and early education. Existing entitlements for parents and carers include 15 hours of free early education for children 9+ months in working families, two-year-olds in low/no-income households or who are vulnerable and 30 hours for 3 and 4-year-olds from working families.

In March 2023 the previous government announced an expansion of these entitlements to include 15 hours free early education for children aged 9 months upwards from September 2024, with all children aged 9 months upwards from working families able to access 30 hours of free early education by September 2025. This was a significant change for the sector which has adapted, and many providers have already started delivering these new entitlements.

The Council's early years team administers the free entitlement for schools and private, voluntary and independent (PVI) providers. This enables a full overview of early years provision, monitoring the take up both at ward level and across the borough. Detailed sufficiency monitoring takes place each autumn providing a comprehensive picture of demand and availability of places for the new entitlements and identifies where demand may outstrip supply. This exercise informs sufficiency activity to target issues and gaps in provision.

The early education and childcare sector within the borough is diverse, operating in the private, voluntary and independent (PVI) sectors, as well as through maintained providers. Provision for children before they reach statutory school age can include self-employed childminders operating from home, preschool play groups (often run by voluntary management committees), day nurseries (mainly privately run) and school-based provision. Childcare which supports school-age children (often known as 'out of school' or 'wraparound' childcare), can be offered by childminders, voluntary or private groups and schools. In Brent, this mixed economy of 0-5 childcare provision currently sees 57% of 3- and 4-year-old free entitlement places delivered by the PVI sector and 43% by the maintained sector.

2.2 Demand for Primary Places

Following consistent growth in the need for primary school places in Brent from 2006-2015, demand for primary school places across the Borough peaked in 2017 and has been declining since then. Numbers on roll have continued to decrease to 24,434 in January 2026 (a reduction of 529 children since January 2025) and are forecast to continue falling over the next five years to around 23,000 by 2030/31. The latest Greater London Authority (GLA) projections indicate demand will fall by 2031/32 to a level last seen in 2010/11. As a projection, these forecasts are subject to change, but they are based on existing and historical attendance and migration patterns in the borough. Longer term forecasts suggest that demand will rise again after this point, but for the purposes of this strategy primary projections are provided up to 2030/31. This is because projections are less reliable after this time due to uncertainty over future birth rates.

The fall in demand is a result of a number of factors including lower birth rates across the whole of London, the impacts of Brexit, the Covid-19 pandemic and more recently the cost-of-living crisis where families are finding they are unable to afford to move into or remain living in the borough. This has all led to some migration away from both Brent and London respectively.

Projections take into account growth in demand as a result of new housing developments in the borough and those just outside the borough border. Brent's housing target as set by the London Plan requires the delivery of 23,250 new homes by 2028/29. This is equivalent to one new home being built for every five that currently exist. Growth areas where new housing is focused are expected to increase demand for local schools.

While projections indicate overall falling primary demand across the borough with a high number of spare places as a result (around 17%), distribution of demand is not equal across the 6 primary school planning areas. Some areas of the borough may still see demand exceeding availability of places, whilst others have low demand at the same time. The Local Authority will continue to support individual schools and groups of schools in managing the impacts of reduced pupil numbers.

2.3 Demand for Secondary Places

Demand for places in Year 7 has been increasing since 2013 in response to increased cohorts moving through the primary phase and into the secondary phase. In response to forecast growth, the North Brent School opened in 2020 and started to operate to its full capacity as a six-form entry school from September 2024 on its permanent new site on Neasden Lane, Neasden.

Demand for school places is cyclical and therefore it is expected that after a period of sustained growth there will be a period of falling demand as smaller cohorts progress through primary provision into Year 7.

Secondary demand is also affected by both inward and outward migration to and from the borough, population mobility levels and parental choice, all supported by the availability of free school transport for secondary aged children in London. Due to Brent's proximity to other boroughs, parents have a choice to send their children to secondary schools in Brent or schools in other boroughs. Brent engages with neighbouring boroughs to understand their planning assumptions about cross-border movement, which can impact on demand for places in Brent. When neighbouring boroughs face increased demand for secondary school places, Brent parents will find it increasingly difficult to access places in out-of-borough secondary schools.

Figures in the January 2025 school census showed an unexpected increase in the number of pupils on roll in Year 7 (3,446 compared to a projected figure of 3,134, an increase of 312 pupils). The subsequent January 2026 census also showed an increase in the number of pupils on roll in Year 7 (3,352 compared to a projected figure of 3,193, an increase of 159 pupils). These increases materialised through a higher number of offers on National Offer Day and in subsequent co-ordinated and in-year offers. Numbers on roll in years 8 – 11 in the January 2026 census were comparable to the 2024 and 2025 projection figures. The higher number of pupils in Year 7 has informed subsequent sets of projections. This in turn has resulted in the overall secondary projections suggesting a lower surplus of capacity than previously forecast, with the potential for spare capacity to fall below 5% in some year groups from 2027/28. If measures are needed to increase capacity, this will involve the use of bulge classes rather than permanent expansions.

In 2026, 798 out-of-borough offers were made to Brent residents, whereas 686 offers at Brent schools were made to out-of-borough residents (net -112). While Brent remains a net-exporter of secondary pupils, the percentage of offers made to out-of-borough schools remains below

25% for the third consecutive year and is the smallest net difference recorded over the past fourteen years. This indicates more parents are recognising the quality of Brent secondary educational provision. Table 1 shows the number of Year 7 children living in each secondary planning area by the Local Authority of the school they were offered on national offer day in 2026.

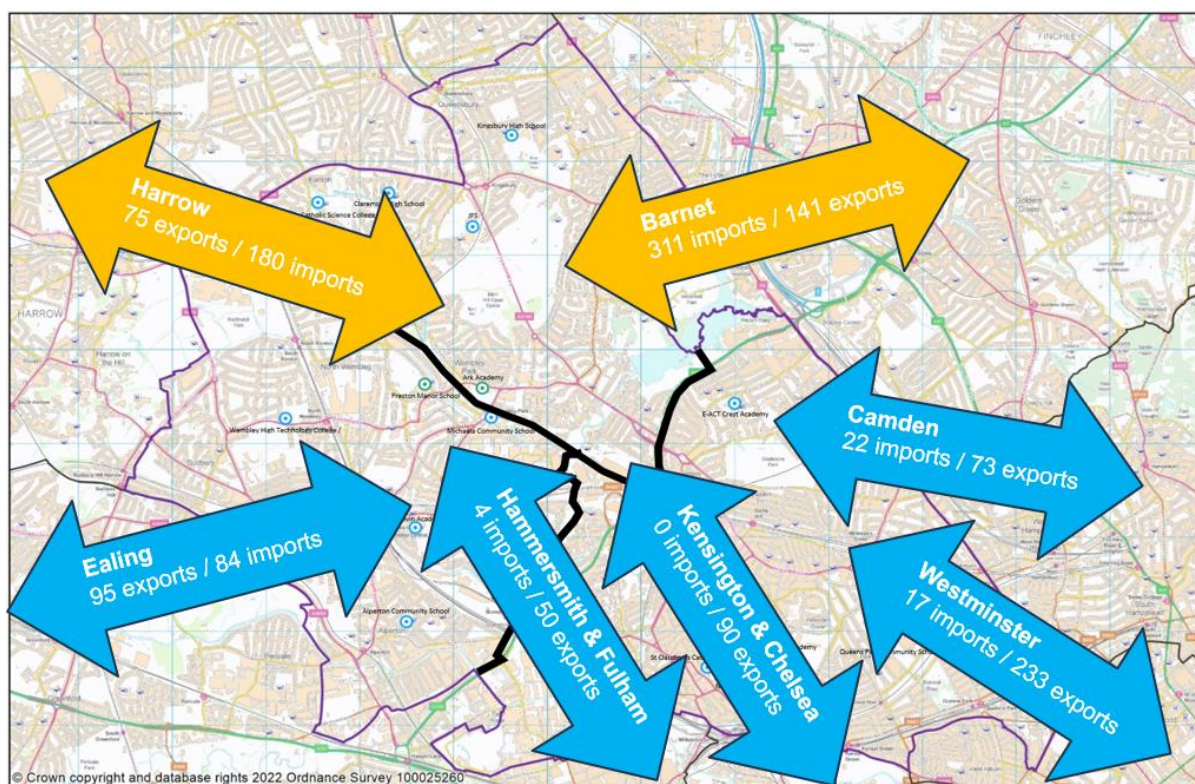
Table 1: Secondary offers by secondary planning area for Brent residents (Sept 2026)

LA of offered school 2026	Brent resident planning area			
	PA North	PA West	PA South	Total
Brent	566	990	899	2455
Brent %	80.4%	92.0%	61.1%	75.5%
Barnet	63	7	71	141
Buckinghamshire	3			3
Camden	1	1	71	73
Ealing	1	32	62	95
Hammersmith and Fulham	1	4	45	50
Harrow	53	16	6	75
Hertfordshire	6	2	6	14
Hillingdon			1	1
Hounslow		2		2
Kensington and Chelsea		7	83	90
Leeds			1	1
Leicestershire			1	1
Slough	2	8	1	11
Southend-on-Sea	1			1
Surrey			1	1
Sutton		2		2
Wandsworth			1	1
Westminster	7	5	221	233
Windsor and Maidenhead			1	1
Non-Brent Total	138	86	572	796
Non-Brent %	19.6%	8.0%	38.9%	24.5%
Grand Total	704	1076	1471	3251

Figure 1 shows cross-border flows for Year 7 place allocations with directly neighbouring authorities (based on national offer day data 2026). Blue is where more children leave Brent to be educated in another Local Authority, whereas amber means more children come into Brent from outside the borough to be educated in a Brent school. The most substantial change from

the last refresh of this strategy relates to Ealing, where the number of Brent children attending Ealing schools has increased from 75 to 95.

Figure 1: Secondary children being educated across border for Year 7 in 2026/27



*Imports are children who come into Brent to be educated, and exports are those who live in Brent and are educated in out of borough schools.

2.4 SEND places and Alternative Provision

Demand for places that meet the needs of children and young people with Special Educational Needs and Disabilities (SEND) is increasing. This is due to a rise in the number of Education, Health and Care Plans (EHCPs) being issued, which set out the support for children and young people with SEND between the ages of 0 – 25 years of age.

The annual SEN2 analysis (January 2026) stated an annual growth rate in the number of maintained EHCP Plans of 10.1% between 2025 and 2026, up from 8% in 2024 - 2025. As of August 2026, there are 4408 children and young people living in Brent aged 0-25 with an Education, Health and Care Plan (EHCP), up from 4025 in August 2025. Of these, 2908 are statutory school age (age 5-16), up from 2414 in August 2025, which equates to 6.1% of the school population (similar to national levels, which currently sit at 6%). 13.3% of pupils are identified with additional needs that can be met at SEN support where a need is identified but does not meet threshold for an EHCP (compared to 14.8% nationally).

Over the last year, EHCP numbers increased across all age groups, although growth was uneven. The largest increases were in the 20-25 (22.2%) and 16-19 (15.3%) age groups, compared with the previous refresh, when the highest growth was in the 5-10 (8.2%) and 16-

19 (7.4%) age groups. Addressing the sufficiency of local places for Brent children with SEND of both primary and secondary age, and for the 16-25 age group is a Council priority, not only to meet demand but to reduce dependency on out-of-borough and independent special schools that are not close to families' support networks. Brent Council has committed investment of over £44m to develop additional specialist places across mainstream and specialist provision, including Wembley Manor, a new secondary special school that occupied new premises in September 2025, and a Post-16 Skills Resource Centre for young people with SEND projected to open in September 2027. In line with these commitments, Brent has delivered a 12% increase in special school places in the 2025/26 academic year.

Despite these delivered increases and the planned capital investment, continually increasing demand means that more local specialist places are still needed, especially for primary aged pupils with SEND. To this end, the Council has developed a 'Phase 2' capital investment programme for specialist provision (approved by Cabinet in January 2026). Phase 2 includes a new specialist primary school site, alongside significant expansion of existing specialist settings and the creation of new ARPs. A proposed 'Phase 3' capital investment programme for specialist provision is in development and will be shaped by expectations of the new Government SEND Reforms. As the messaging from central Government around SEND has focused on the development of a more inclusive mainstream system, Phase 3 will likely include an increased emphasis on the creation of ARPs, inclusion bases and special schools that function as both 'schools' and providers of training and support to the local area.

2.5 Post-16 Provision

The Education and Skills Act 2008 require all young people in England to continue in education or training until at least their 18th birthday. The Council does not have a duty to manage places in this phase but nevertheless works in partnership with schools and local colleges, including the College of North West London, to ensure young people aged 16-18 (and up to the age of 25 for those who have an Education, Health and Care Plan) have access to a range of opportunities to continue their education or training at a wide range of post-16 providers or through apprenticeships. This supports young people with their preparation for adulthood.

3. The Strategic Approach to Place Planning

The focus of the 2019 – 2023 School Place Planning Strategy was to ensure there was sufficient demand to meet supply in the borough. When it was published in November 2018, it referred to the development of two new primary schools, one of which was proposed in response to housing developments in Wembley Park to be delivered when demand indicated it would be required. Neither of these schools were progressed during the lifespan of the previous strategy, (which was also refreshed annually), as updated forecasts indicated insufficient demand. In response to lower pupil projections, the Local Authority implemented both informal and formal measures to reduce or remove capacity in Brent Primary Schools.

The focus of the School Place Planning Strategy 2024 – 2028 is to ensure the sustainability of school places in areas where the population is falling, and the sufficiency of school places when there is growth, working in partnership with Brent schools to achieve this. Longer term general

population forecasts suggest that the total population of Brent could rise by between 17% and 27% between 2023 and 2041, and the child population aged under 16 could rise by up to 12% over the same period. Projected changes in the child age group should, however, be treated with some caution as they are very sensitive to assumptions about future migration and birth patterns.

Brent aims to have a minimum of 5% spare places in all year groups to both manage in-year migration and to ensure the authority can respond to any sudden increase in demand. This avoids the need to open temporary provision or bulge classes, which is neither educationally desirable nor cost effective. Based on current forecasts, there will be around 17% spare primary places at borough level over the next few years. Secondary capacity is forecast to have around a 5% surplus capacity in the short term, but this may fall over the next 7 years in some year groups (the timeline covered in this Strategy).

3.1. Place Planning Projections

Regularly updated place planning projections underpin the school place planning process. The projections Brent and most other London authorities use to inform place planning are provided by the Greater London Authority (GLA) which are informed both by centrally held demographic data, such as census, fertility rate and birth rate data provided by the Office of National Statistics (ONS), together with locally held information on migration patterns and planned housing growth (ward level housing development data provided by the Borough). The projection methodology and model:

- calculate the number of children resident in each ward who are expected to attend each school by each national curriculum year from Reception to Year 11. The number of children projected for each new intake is calculated as an average of the proportion of children in those wards that attended the school in the previous 3 years multiplied by the ward level age population data. This helps to smooth out any unusual variations that are unlikely to reoccur each year. For other year groups the model calculates the current proportion of children in the ward attending the school and applies this to the ward level population data. School level projections are then aggregated to planning area projections and Borough totals.
- takes account of the percentage of children who historically move into the following academic year in an area. This is particularly important in Brent where there is a high level of pupil mobility and migration to schools in other boroughs.

The GLA projections are a good indicator of place need, but they remain a statistical model which should be seen as a valuable tool rather than a definitive position. There are a number of factors which can lead to the projections being revised up or down:

- Underlying data, such as birth rates and migration patterns and the impact of local regeneration projects can change significantly in a short period of time.
- Secondary projections are more secure as they largely take account of children already in the education system. However, the percentage of children who historically move into

the following academic year is a particularly important factor in Brent which is currently a net exporter of secondary pupils. This may change if pressures on secondary places in neighbouring boroughs lead to an increase in demand beyond those in the current projections.

- The Local Authority monitors both current and emerging local and national factors (such as, historically, post Brexit implications and the COVID-19 pandemic) that can impact on school place demand by changing migration patterns. It is difficult to predict the impact of these factors on demand for school places and in particular demand from families of Eastern European origin. Demand at schools that serve these communities are closely monitored.

3.2 Ensuring sufficiency of places during periods of growth in demand

Where an area is projected to experience a sustained growth in demand, generally it is more cost effective to provide permanent places if they are needed for the longer term. However, there are times where site and time constraints mean this is not possible and there are also occasions where the growth in numbers only applies to one cohort of students. In these circumstances, it is better to provide a temporary bulge class.

Expansion in the secondary phase is more complex than primary, partly because specialist facilities (e.g. sport, science or technology) may need to be provided alongside standard classrooms. Students may also need to access these facilities during building processes which makes expansion more challenging and can impact on cost. Similarly, providing additional specialist places for children and young people with SEND requires delivery of a range of specific facilities.

Where additional school places are needed, the Council seeks to provide places that provide high-quality provision. This could be through expanding existing schools or through new schools. There are benefits to both approaches:

- Expanding existing schools that are judged to be delivering a high-quality education by Ofsted gives the Council greater confidence that additional provision will be good and will be popular. It also helps to maintain stability in the existing school system. School expansion projects need to be well managed to avoid impacting on standards and on any particular groups of children and young people who are under-achieving. Expansions of existing provisions are funded by the Council from Basic Need grant funding or the Special Provision Capital Fund for Additionally Resourced Provision and SEND places.
- New schools offer a chance to provide new learning environments through new facilities. However, identifying sites for new schools is difficult because of space constraints and lack of suitable available options within the borough.

3.3 Supporting schools and planning areas with falling demand.

When demand for school places falls significantly and the number of spare places increases, this can cause difficulties for individual schools in managing staffing requirements and school

budgets. Where this occurs, the Council analyses a range of local data, including but not limited to recent intakes and vacancies, parental preferences, availability of places within the local planning area, school standards and pupil outcomes, and the status of school finances, before recommending strategies to support the sustainability of school provision in a given planning area.

A range of options may be employed to support schools or groups of schools with falling demand and these are set out below. Any decision to reduce capacity has to be carefully considered in the context of the medium and long-term need for school places for all children, including those with SEND. The cost of developing a new schools in London has significantly increased over the course of the current strategy, any significant changes in capacity need to be carefully considered taking into account the local context and local future forecasts.

3.3.1 Reductions to Published Admission Numbers (PAN)

A reduction to a school's Published Admission Number (PAN) reduces their official intake, normally by one or more forms of entry. This is only agreed when it is in line with local demand. PAN reductions are subject to formal consultation and therefore can take up to two years to implement which means they are not a quick solution, and local demand can change within that timeframe. Reducing PAN can help undersubscribed schools manage their budgets more efficiently, but it is not a panacea to falling rolls. Furthermore, PAN reductions cannot be employed for every undersubscribed school as the Local Authority may need to maintain some spare capacity for in-year admissions.

There are currently a number of primary and secondary schools in Brent with Published Admission Numbers below their built capacity. This provides the option to negotiate with schools to increase PANs if there is sustained rising demand in a planning area.

3.3.2 Informal capping arrangements

Informal caps can support schools by limiting their intake in a particular year group where demand is below Published Admission Numbers. They can be implemented quickly in response to a current situation and can easily be removed if there is an increase in demand in an area. For example, a three-form entry school that has only 55 offers for a new Reception cohort may request to operate as a two-form entry for the cohort. This would mean any subsequent in-year offers would stop once the cohort reaches 60 pupils. However, implementing informal caps is not a long-term sustainable solution, nor does it allow for good school organisation planning. Any informal CAPs in place in Brent schools are kept under regular review.

3.3.3 Utilising spare capacity for specialist education provision for children SEND and Alternative Provision

Spare capacity that is unlikely to be required in the longer-term can sometimes be repurposed for alternative use, such as Additionally Resourced Provision (ARP) for children with SEND. Any long-term alternative use of spare capacity within existing school buildings must be agreed by the Local Authority, to ensure the places are not likely to be required to support either local

demand or demand in neighbouring planning areas. The use of spare capacity in the mainstream school estate for additional specialist educational provision is explored through reviews of primary planning areas and analysis of SEND demand to inform the SEND phased capital programme.

3.3.4 Hard Federation

A Hard Federation is where two schools formally join in partnership under one governing board and one leadership team. This arrangement can provide the opportunity for schools to share best practice and resources. However it does not directly address the issue of reduced demand.

3.3.5 Amalgamation

An Amalgamation is where two schools join together to form one school. Typically, this involves infant and junior schools merging to become one primary school on one school site. However, an amalgamation can also be used to join two schools together in the same area where the existing schools are undersubscribed through one set of admissions arrangements and occupancy of one site, which offer economies of scale.

3.3.6 Removing capacity from the School Estate

Brent works collaboratively with schools in identifying solutions for a local planning area where a school reorganisation action is considered the most advantageous way to ensure the sustainability of local educational provision. Legislation provides the Council with the authority to close community schools, Voluntary Controlled, Voluntary Aided and Foundation schools or to require them to amalgamate. It does not have the same authority over academies as this sits with the schools Trust and/or DfE's Regional Director.

The Local Authority undertakes informal consultation with stakeholders on proposals to cease provision to ensure their views are considered before any decision to proceed to formal consultation is taken by Brent Cabinet in line with the relevant statutory DfE guidance.

4. School Place Planning Strategy Priorities and Principles

Brent's priorities over the course of this strategy are:

- To monitor and support those planning areas experiencing or anticipated to experience growth and high demand to ensure the sufficiency of local places is maintained.
- To support the sustainability of individual schools and planning areas experiencing falling demand.
- To ensure any measures taken that remove capacity from Brent schools do not negatively impact on the need to ensure sufficient places in the future.
- To continue to develop and implement strategies for increasing the level of specialist educational provision within the borough to meet children's needs.

4.1. Brent's operating principles for school organisation

The following operating principles underpin Brent's approach to school place planning:

- 1: The Local Authority works in partnership with all schools to meet the sufficiency and sustainability of school places in Brent, putting in place effective strategies to manage changing demand.
- 2: The needs of all children and young people, including those with SEND and vulnerable groups, underpin all school place planning activity.
- 3: The delivery of sufficient school places enables the achievement of the aims and objectives of the Brent Strategic Framework for School Effectiveness 2026-2030 and inclusive schools.
- 4: School leaders are supported to manage the challenges of school reorganisations where there are expansions or reductions to capacity.
- 5: Inclusive provision will be considered in all school organisation proposals, and the Local Authority will work with neighbouring authorities on the planning of special school places.
- 6: All school buildings will be of good quality and safe. Any changes to school buildings should meet government guidance on space standards but innovative design solutions will also be considered where it is value for money to do so.
- 7: Any expansions of school places, including in academies and voluntary aided schools, will only be supported where there is agreed, local Brent demand.
- 8: The Local Authority works to develop local capacity Including proposing or supporting the development of new schools, where identified as necessary.
- 9: How the community can benefit from school facilities will be considered in all school organisation proposals.
- 10: Local communities will be consulted as part of the planning process to minimise/mitigate the impact of school organisation proposals
- 11: After assessing educational suitability, any reorganisation proposals will be judged in terms of value for money, delivery and strategic fit with wider capital investment programmes.
- 12: Federations between schools and the amalgamation of infant and junior schools will be judged on their ability to support the quality of education and efficient use of school budgets.

5. School Place Planning Strategy Measures of Success

The impact of this strategy will be measured by the following outcomes:

5.1 All Brent schools are good or outstanding (as per applicable Ofsted gradings at the time).

This was 95.3% at the end of the 2023/2024 academic year, 96.5% at the end of 2024/2025 academic year and 96.5% at the end of 2024/2025 academic year. In 2025/26 Ofsted changed its inspection framework and moved away from single-word judgements. The new measure to be used is the percentage of schools rated as at the Expected Standard or higher in all Ofsted judgements.

5.2 Children are able to access education close to home (under two miles for children under 8 and 3 miles for children up to Year 6; within 75 minutes travel time for secondary aged children).

This outcome measure was met in November 2023 and has remained unchanged in all subsequent strategy refreshes.

5.3 Brent net exportation of secondary school pupils reduces over the duration of this strategy to 25% with a stretch target of below 25%.

The baseline was 25.8% for the commencing of the new strategy. This figure was 24.3% in 2024, 23.8% in 2025 and 24.5% in 2026, meaning the target continues to be met. Additionally, the net difference between Brent pupils being offered out of borough schools and out of borough pupils being offered Brent schools is the lowest since recording began at –112. Brent remains a net exporter, but more places are now being offered to children from other local authorities.

5.4 An increase in local SEND places in the borough will lead to a reduction in the use of out-of-borough placements and placements in independent non-maintained special schools.

The percentage of placement spend on the independent, non-maintained special schools (INMSS) (Lower is better) was 17.8% at the end of the 2025/2-26 financial year which is slightly lower than 18.8% at the end of the 2024/2025 financial year.

5.4 The take up rate of free childcare entitlements in the borough increases over the course of the strategy to 70% for two-year-olds and 80% for 3 and 4-year-olds.

	2-year entitlement	3 and 4 years
January 2023 (baseline)	65.4%	79.3%
January 2024	59.6%	84.8%
January 2025	53.4%	80.4%
January 2026	59.3%	77.5%

The latest figures are below the target and below the London average. Brent remains ambitious in increasing the uptake of early years entitlements and this strategy outlines steps to achieve this (Section 6).

6. Childcare and Early Years Provision

6.1 Early Years Provision

Under the Childcare Act 2006, local authorities have a statutory duty to secure sufficient childcare for the needs of most working parents/carers in their area. Brent has a mixed economy of 0-5 childcare provision in the borough that includes private, voluntary, independent (PVI) and maintained settings.

As of August 2026, there were 272 providers including private, voluntary and independent nurseries (PVI), childminders, nursery classes in schools and maintained nursery schools in Brent with 251 registered to deliver funded early education places. Places for children aged two and under are largely delivered by the PVI sector and childminders.

The decrease in number of childminder providers in the borough has continued with some moving out of the borough and others resigning as registered childminders. This change continues to be reflective of a nation-wide trend. Closures have also been seen amongst group providers in the last 12 months, some quoting rental increases and reduction in demand as closed reasons. Nonetheless there have been other providers who have moved premises to expand and new providers entering the market, indicating an ongoing demand for places.

Figure 2: 0-5 childcare providers in Brent as of August 2026

Free entitlement providers delivery places - Summer 26

Provider Type Description ● Childminder ● Primary School ● PVI provider

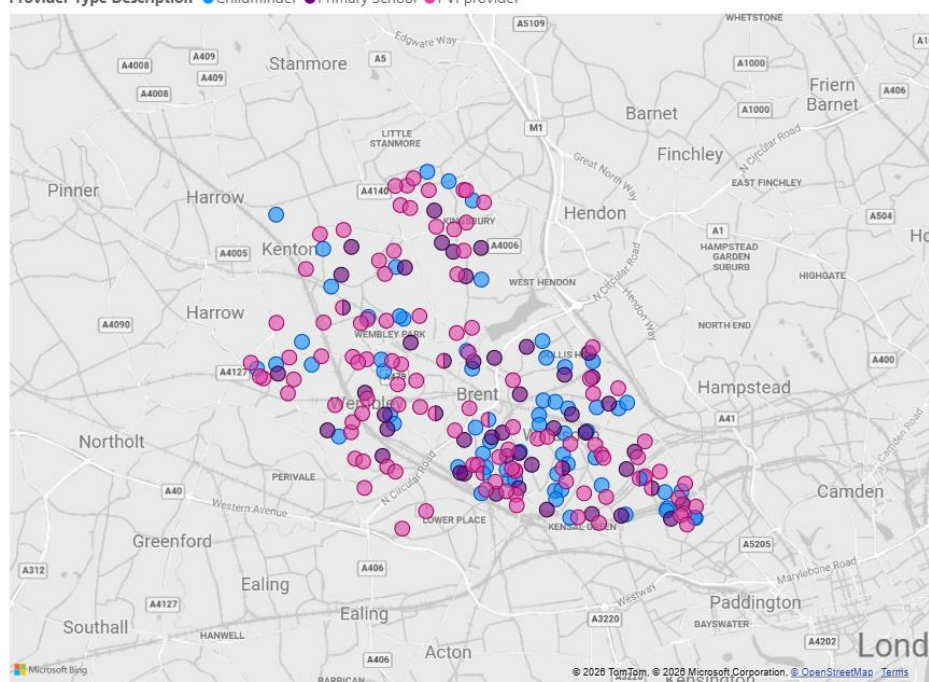
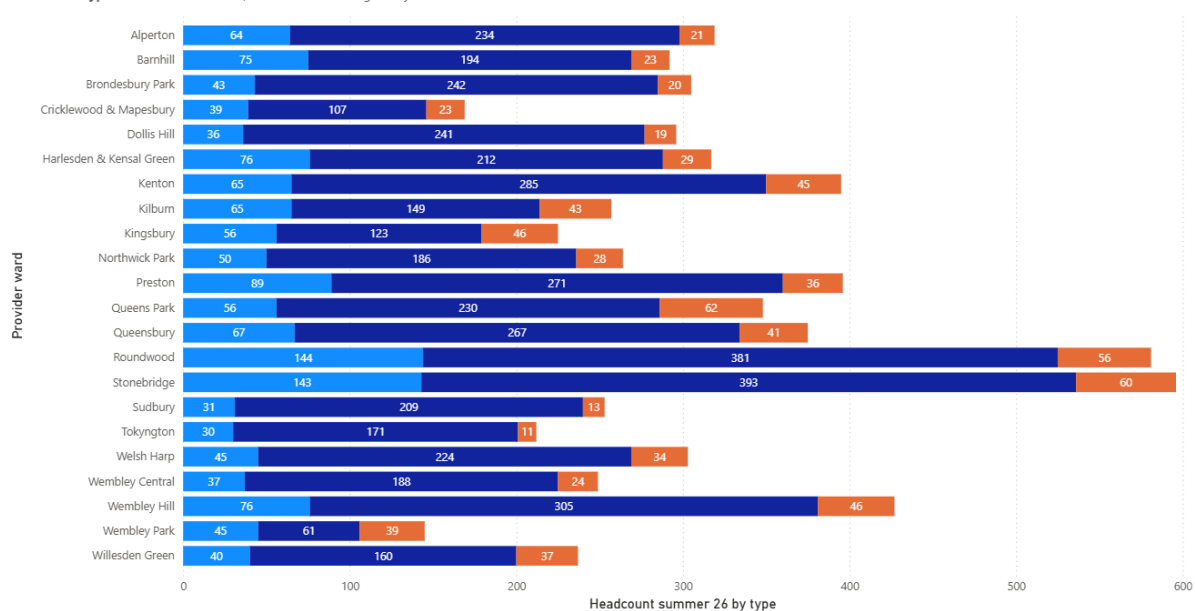


Figure 3: Headcount numbers by entitlement type – Provider ward Summer 26

Headcount by provider ward - Summer 26

Entitlement Type Desc ● 2 Year Old ● 3/4 Year Old ● Working Family



6.2 Take up of Early Years Entitlements

The percentage take-up of the early learning for two-year-olds entitlement for low/no income families increased by 5.9% to 59.3% as at January 2026. Despite this increase, Brent take up is below the London average of 66.8% which has also increased by 5.7% this year.

The number of families eligible for early learning for two-year-olds continues to reduce year on year. For example, in summer 2025, information from the Department of Work and Pensions indicated 947 Brent families were eligible, and this has reduced to 752 in 2026. This is attributed to unchanged income thresholds for the eligibility criteria, whilst average incomes have risen in recent years.

As at Summer 2026 headcount, there were 756, 9-23 months and 876, 2-year-olds in working families accessing funded places and there were 481 children taking up early learning for two-year-olds.

Alongside this, falling birth rate in recent years has reduced the numbers of children eligible for all entitlements. Furthermore, as there are a small number of low-income families who are eligible for both early learning for two-year-olds and the working family entitlement for two-year-olds, it is likely that we will see further shifts in take-up of the early learning for two-year-olds entitlement in coming years, as some of these families choose to apply through the working family route in order to access 30 hours rather than 15 hours. In future headcounts providers will be required to complete additional check to ensure that families eligible for early learning for two-year-olds claim this entitlement for the first 15 hours of provision accessed. This reduces the risk that children will become ineligible for any entitlement for a family's circumstances change.

6.3 Sufficiency of Early Years Entitlements

Detailed sufficiency mapping takes place each term, monitoring take-up both borough-wide and at individual ward level. This tracks demand for, and availability of, places for the new entitlements and identifies where demand may outstrip supply and gaps in provision in the borough.

Brent's promotional campaign to increase the take-up of the free entitlements to early education and childcare focuses on increasing awareness and take-up by helping families understand what support is available, the benefits for children's development and school readiness, and how childcare can support parents to access employment, training and education opportunities. This promotion focuses on ongoing marketing and promotion to families and raising awareness of entitlements with partner agencies, alongside highlighting the benefits for both the child and for the parent who can use the time for training or employment opportunities.

With the national focus on the importance of the earliest years in shaping future life chances, through programmes such as Best Start in Life, there is a clear emphasis on the early years as a key priority for the government. All London boroughs have been set a target for 76% Early Years children to achieve GLD (an increase of 9%) by 2028 and Brent has made a positive start to achieving this target based on unvalidated GLD data

For Brent, this focus builds on the strong foundations laid through the multi-agency Family Hubs and Best Start In Life programme, enabling coordination of services and the development of a universal and targeted framework of support from pre-birth to aged five, working towards reducing inequalities and improving the outcomes of all children and families in Brent.

To develop the council's overarching ambition for our youngest children in Brent, underpinned by desired outcomes for children across health, school readiness, safeguarding and inclusion, an Early Years Strategy was launched in March 2026. The Brent Early Years Strategy sets out a clear vision for improving outcomes for young children and families through six strategic priorities: a joint commitment to system-wide change; a seamless and integrated experience for families that is jointly owned and delivered across partners; data and intelligence that work effectively for both families and professionals; a welcoming and inclusive start for every child and family, with a strong focus on early years inclusion; a clear Best Start pathway for every Brent baby and family; and high-quality, sustainable early education and childcare that enables all children to thrive.

These priorities align with and support the ambitions of the Best Start in Life programme, which focuses on strengthening support for families through Family Hubs, improving access to high-quality early education and childcare, raising quality across early years and reception provision, enhancing support for children with Special Educational Needs and Disabilities (SEND), and developing a resilient workforce and system. The strategy provides an important foundation for ensuring children are school-ready, reducing inequalities at the earliest opportunity, and supporting the long-term sustainability of education and childcare provision across Brent.

7. Primary School Place Planning

A borough-wide fall in demand for places is projected to continue over the next five years as shown in Graph 1.

Graph 1: Primary numbers on roll and projections as of January each year up to 2031

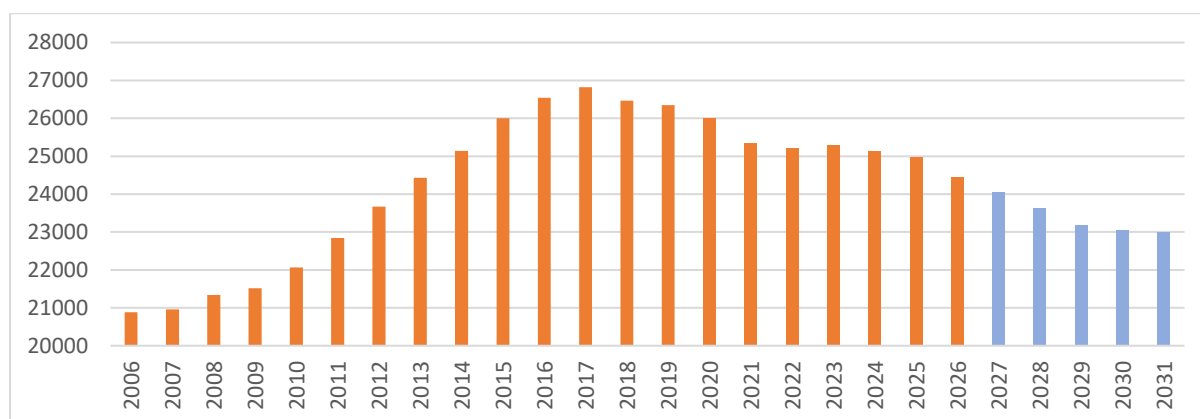


Table 2 shows that borough-wide there is sufficient capacity to meet anticipated demand across all primary year groups up to 2030/31 and to manage in-year pupil mobility.

Table 2: Primary forecasts 2026 (Green highlight = +5% capacity, red text = +15% capacity)

Whole borough	Dataset	Rec	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
2026/2027	Capacity	4,187	4,187	4,187	4,187	4,187	4,187	4,187
	Projection	3248	3262	3433	3496	3510	3578	3515
	Surplus	939	925	754	691	677	609	672
	Surplus Percentage	22%	22%	18%	17%	16%	15%	16%
2027/2028	Capacity	4,127	4,127	4,127	4,127	4,127	4,127	4,127
	Projection	3219	3217	3222	3435	3473	3494	3577
	Surplus	908	910	905	692	654	633	550
	Surplus Percentage	22%	22%	22%	17%	16%	15%	13%
2028/2029	Capacity	4,127	4,127	4,127	4,127	4,127	4,127	4,127
	Projection	3237	3190	3191	3209	3418	3455	3492
	Surplus	890	937	936	918	709	672	635
	Surplus Percentage	22%	23%	23%	22%	17%	16%	15%
2029/2030	Capacity	4,127	4,127	4,127	4,127	4,127	4,127	4,127
	Projection	3362	3223	3173	3206	3212	3416	3466
	Surplus	765	904	954	921	915	711	661
	Surplus Percentage	19%	22%	23%	22%	22%	17%	16%
2030/2031	Capacity	4,127	4,127	4,127	4,127	4,127	4,127	4,127
	Projection	3391	3349	3210	3191	3222	3222	3420
	Surplus	736	778	917	936	905	905	707
	Surplus Percentage	18%	19%	22%	23%	22%	22%	17%

Key: Green = 5%+ spare capacity (red text = 15%+); yellow = 5% spare capacity; amber = less than 5% spare capacity and red = shortfall

Longer term projections, although less reliable for primary forecasts, indicate reception demand will rise from 2032/2033 linked to a rise in the birth rate from 2024/25. Table 3 shows forecast Reception intakes against capacity. This suggests over the next five years that Reception cohorts will begin to rise again. This is consistent with the projected rising birth rates as seen in Table 4. This projected rise in demand is not evenly distributed across the borough, with some primary planning areas showing pressure on school places and others showing an increasing level of surplus places (see details of each primary planning area).

Table 3: Reception forecasts against capacity

Year	Reception projected intake	Reception capacity	Spare places	% spare places	Spare places as forms of entry
2026/27	3248	4187	939	22.4%	31
2027/28	3219	4127	908	22.0%	30
2028/29	3237	4127	890	21.6%	29
2029/30	3362	4127	765	18.5%	25
2030/31	3391	4127	736	17.8%	24

Table 4: Births in Brent (by academic year)

Academic Year	Number of births in Brent (Source ONS mid-year estimates/GLA Projections)	Reception entry (September following 4th birthday)
2018/19	4823	2023/24
2019/20	4800	2024/25
2020/21	4436	2025/26
2021/22	4474	2026/27
2022/23	4382	2027/28
2023/24	4363	2028/29
2024/25	4499	2029/30
2025/26	4488	2030/31
2026/27	4503	2031/32
2027/28	4522	2032/33
2028/29	4585	2033/34
2029/30	4665	2034/35
2030/31	4754	2035/36

The number of on-time applications for Reception in 2026 fell for the second time in two years after two consecutive years of increased on-time application numbers (a drop of 264 applications or 7.8% from 2024). On time applications are important for all normal points of entry as they provide the greatest opportunity for parents to receive an offer for a preference school and schools are better placed to manage forms of entry, classroom and staff numbers.

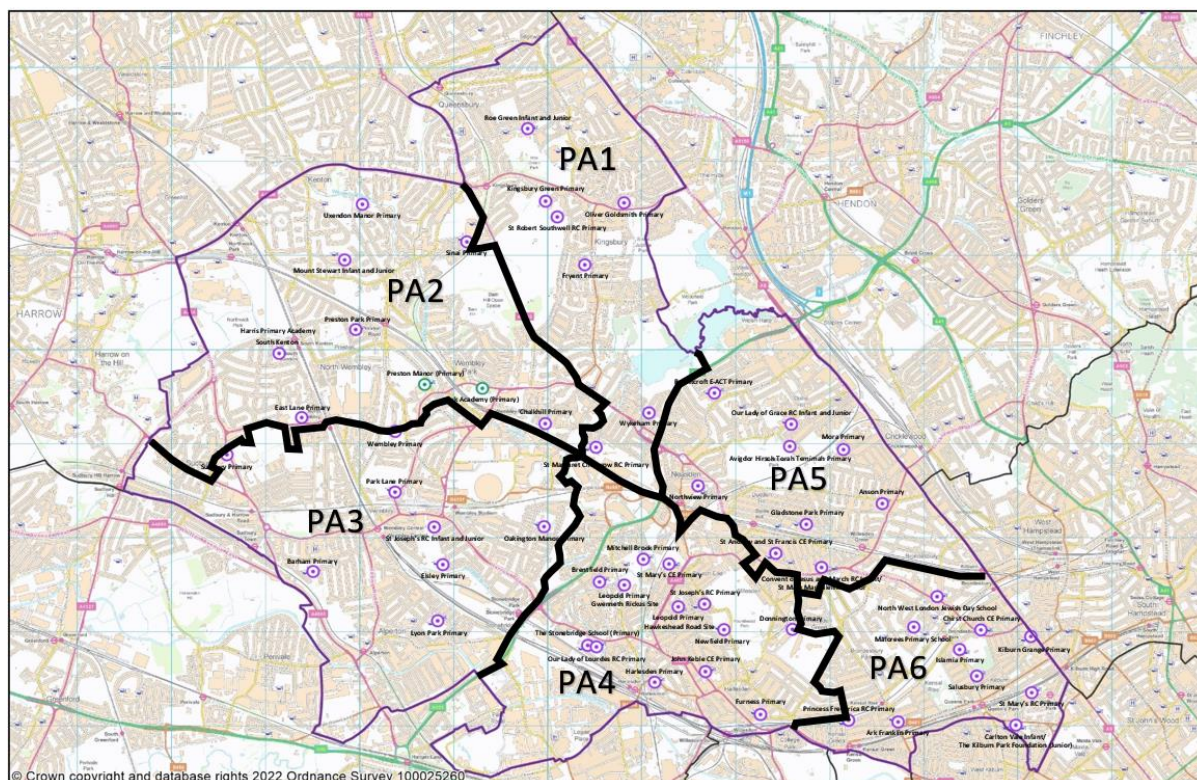
The large number of surplus places at Reception means that outcomes for late applicants are better than in previous years with more unfilled places. In 2026 at total of 34 schools had vacancies after national offer day, including eight schools that had previously been oversubscribed on National Offer Day 2025.

7.1 Primary Planning Areas

The Local Authority uses planning areas to identify local trends in demand which help to inform place planning decisions to ensure children can attend a school within a reasonable distance. (In the primary phase a “reasonable offer” is a school offer that is made within 2 miles of home for children under 8 years old, and 3 miles for older children). The borough is divided into six primary planning areas to help ensure places are provided near to where children live. However, in reality children can travel across planning areas to attend school, particularly when they live close to another planning area.

All planning areas are aligned with the 2022 ward boundaries. This provides a clearer picture of demand as GLA projections are also based on these wards.

Figure 4: Brent Primary Planning Areas



Key to Planning Area tables

For each of the primary and secondary projection tables in each of the planning area, the shading relates to the percentage of surplus places available. Brent aims to have a minimum of 5% spare places to manage in-year migration and to ensure the authority can respond to any sudden increase in demand.

More than 5% capacity (Red text = 15%+ spare capacity)	5% spare capacity	Less than 5% spare capacity	Shortfall of places
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Primary Planning Area 1

Wards	Kingsbury, Queensbury and Welsh Harp
Schools	Fryent Primary School, Kingsbury Green Primary School, Oliver Goldsmith Primary School, Roe Green Infant School, Roe Green Junior School, St Margaret Clitherow RC Primary School, St Robert Southwell RC Primary School, Wykeham Primary School

Demand: The January 2026 projections indicate that demand in Planning Area 1 will fall slightly and that demand will not recover to the same level as five years ago, as indicated by the 2025 projections. It is projected that after two years, all year groups will operate with a surplus above the 5% margin the LA aims to maintain. In the meantime, it is anticipated that places in neighbouring planning areas will accommodate any pressures in year groups up to 2028. Some mainstream capacity in the planning area is being used to provide ARP places. Longer term projections, which are less reliable, do not indicate that demand will rise and exceed capacity.

Planned action: The PAN at Fryent Primary School was reduced from 120 to 90 places in September 2025 to recognise that capacity is already being used for ARP provision. This has not had an impact on the overall availability of places in the area. The planning area will remain under review to determine if any longer-term actions are required to address spare capacity.

Table 5: Planning Area 1 2026 projections and capacity

PA 1	Dataset	Rec	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
2026/2027	Capacity	510	510	510	510	510	510	510
	Projection	456	467	492	472	490	508	478
	Surplus	54	43	18	38	20	2	32
	Surplus Percentage	11%	8%	4%	7%	4%	0%	6%
2027/2028	Capacity	510	510	510	510	510	510	510
	Projection	421	451	462	472	465	483	499
	Surplus	89	59	48	38	45	27	11
	Surplus Percentage	17%	12%	9%	7%	9%	5%	2%
2028/2029	Capacity	510	510	510	510	510	510	510
	Projection	438	420	452	437	468	463	479
	Surplus	72	90	58	73	42	47	31
	Surplus Percentage	14%	18%	11%	14%	8%	9%	6%
2029/2030	Capacity	510	510	510	510	510	510	510
	Projection	449	430	423	433	433	463	454
	Surplus	61	80	87	77	77	47	56
	Surplus Percentage	12%	16%	17%	15%	15%	9%	11%
2030/2031	Capacity	510	510	510	510	510	510	510
	Projection	448	444	433	404	433	429	450
	Surplus	62	66	77	106	77	81	60
	Surplus Percentage	12%	13%	15%	21%	15%	16%	12%

Key: Green = 5%+ spare capacity (red text = 15%+); yellow = 5% spare capacity; amber = less than 5% spare capacity; red = shortfall

Primary Planning Area 2

Wards	Barnhill, Kenton, Northwick Park and Preston
Schools	Ark Academy, Chalkhill Primary School, East Lane Primary School, Harris Primary Academy South Kenton, Mount Stewart Infant School, Mount Stewart Junior School, Preston Manor Lower School, Preston Park Primary School, Sinai Jewish Primary School, Uxendon Manor Primary School.

Demand: The January 2026 projections indicate that demand in Planning Area 2 will increase slightly over the next five years, although capacity will remain above demand. Projected surplus places are above the 5% margin across all year groups. Parents in this planning area have increased choice of provision. Longer term projections, which are less reliable, indicate that demand will plateau from the early to mid-2030s.

Planned action: Planning Area 2 includes schools operating with PANs below their built capacity to support school leaders in effective school and budget management. It may be necessary to review whether there is a requirement to increase PANs in this area as there are projected pressures on demand in the adjacent planning area 3 from 2028. This will be kept under review and discussions held with schools in relation to appropriate action as required.

Table 6: Planning Area 2 2026 projections and capacity

PA 2	Dataset	Rec	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
2026/2027	Capacity	870	870	870	870	870	870	870
	Projection	659	636	657	695	710	690	708
	Surplus	211	234	213	175	160	180	162
	Surplus Percentage	24%	27%	24%	20%	18%	21%	19%
2027/2028	Capacity	870	870	870	870	870	870	870
	Projection	631	657	634	652	701	682	700
	Surplus	239	213	236	218	169	188	170
	Surplus Percentage	27%	24%	27%	25%	19%	22%	20%
2028/2029	Capacity	870	870	870	870	870	870	870
	Projection	647	632	657	627	666	671	691
	Surplus	223	238	213	243	204	199	179
	Surplus Percentage	26%	27%	24%	28%	23%	23%	21%
2029/2030	Capacity	870	870	870	870	870	870	870
	Projection	683	652	638	653	641	639	681
	Surplus	187	218	232	217	229	231	189
	Surplus Percentage	21%	25%	27%	25%	26%	27%	22%
2030/2031	Capacity	870	870	870	870	870	870	870
	Projection	690	687	654	632	666	618	651
	Surplus	180	183	216	238	204	252	219
	Surplus Percentage	21%	21%	25%	27%	23%	29%	25%

Key: Green = 5%+ spare capacity (red text = 15%+); yellow = 5% spare capacity; amber = less than 5% spare capacity; red = shortfall

Primary Planning Area 3

Wards	Alperton, Sudbury, Tokyngton, Wembley Central, Wembley Hill and Wembley Park
Schools	Barham Primary School, Elsley Primary School, Lyon Park Primary School, Oakington Manor Primary School, Park Lane Primary School, St Joseph's RC Infant School, St Joseph's RC Junior School, Sudbury Primary School, Wembley Primary School

Demand: The latest projections for Planning Area 3 show a broadly similar increase in demand to previous projections, although the point at which demand outstrips supply is now projected to start to take place from 2028 instead of 2026. Projections suggest over the next 5 years, most year groups will be below a 5% surplus margin, with lower year groups operating with no surplus capacity from 2029/30. Longer term projections, which are less reliable, indicate that demand will continue to rise which could lead to a significant shortage of capacity in the 2030s if not addressed.

Planned action: Planning Area 3 includes two major growth areas in Wembley Central and Alperton. Projections for this planning area have consistently suggested demand will outstrip capacity in the future, although the position has been revised every year based on the latest trends. The latest position, based partly on a lower-than-expected demand in 2025/26, is that spare capacity in neighbouring planning areas (Planning Areas 2 and 4) will help to accommodate excess demand in the short term. The longer-term forecasts project a much lower peak demand in 10 years' time than previous forecasts, although these come with considerable uncertainty. The planning area remains under close review to determine whether any longer-term actions are required to increase capacity.

Table 7: Planning Area 3 2026 projections and capacity

PA 3	Dataset	Rec	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
2026/2027	Capacity	820	820	820	820	820	820	820
	Projection	775	757	776	781	784	814	812
	Surplus	45	63	44	39	36	6	8
	Surplus Percentage	5%	8%	5%	5%	4%	1%	1%
2027/2028	Capacity	820	820	820	820	820	820	820
	Projection	786	789	730	778	771	811	821
	Surplus	34	31	90	42	49	9	-1
	Surplus Percentage	4%	4%	11%	5%	6%	1%	0%
2028/2029	Capacity	820	820	820	820	820	820	820
	Projection	805	797	756	724	768	799	816
	Surplus	15	23	64	96	52	21	4
	Surplus Percentage	2%	3%	8%	12%	6%	3%	0%
2029/2030	Capacity	820	820	820	820	820	820	820
	Projection	862	823	769	762	724	802	807
	Surplus	-42	-3	51	58	96	18	13
	Surplus Percentage	-5%	0%	6%	7%	12%	2%	2%
2030/2031	Capacity	820	820	820	820	820	820	820
	Projection	882	879	790	774	760	755	811
	Surplus	-62	-59	30	46	60	65	9
	Surplus Percentage	-8%	-7%	4%	6%	7%	8%	1%

Key: Green = 5%+ spare capacity (red text = 15%+); yellow = 5% spare capacity; amber = less than 5% spare capacity; red = shortfall

Primary Planning Area 4

Wards	Harlesden & Kensal Green, Roundwood and Stonebridge
Schools	Brentfield Primary School, Donnington Primary School, Furness Primary School, Harlesden Primary School, Islamia Primary School*, John Keble CE Primary School, Leopold Primary School, Mitchell Brook Primary School, Newfield Primary School, Our Lady of Lourdes RC Primary School, St Joseph's RC Primary School, St Mary's CE Primary School, The Stonebridge School. *Islamia Primary School is relocating from Primary Planning Area 6 from September 2027

Demand: Planning Area 4 has very high levels of surplus places and the latest projections indicate that there will be only a very small increase in demand over the next 5 years. Longer term forecasts suggest that demand will remain relatively stable despite the area being close to new housing being built as part of the Old Oak and Park Royal redevelopment scheme beyond 2030.

Planned action: A PAN reduction has been put in place at Mitchell Brook Primary School for the 2025/26 Reception cohort. Capacity is being removed from Leopold Primary School with the closure of the Gwenneth Rickus Site (2FE) in July 2027. The Local Authority has approved the relocation of Islamia Primary Schools (2FE) to the same site in September 2027 as the school has been evicted from its current premises by the school's Foundation Trust, increasing the diversity of provision in the area. It is expected that some capacity in this area may be taken up by children who live adjacent to Planning Area 3 where increased demand is forecast. However, a review will be undertaken as, given level of spare places in Planning Area 4, further action will be required to support a sustainable quality of education. This could include utilising spare capacity to increase specialist education provision in Brent.

Table 8: Planning Area 4 2026 projections and capacity

PA 4	Dataset	Rec	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
2026/2027	Capacity	855	855	855	855	855	855	855
	Projection	493	481	551	556	555	605	576
	Surplus	362	374	304	299	300	250	279
	Surplus Percentage	42%	44%	36%	35%	35%	29%	33%
2027/2028	Capacity	855	855	855	855	855	855	855
	Projection	497	478	480	550	544	566	612
	Surplus	358	377	375	305	311	289	243
	Surplus Percentage	42%	44%	44%	36%	36%	34%	28%
2028/2029	Capacity	855	855	855	855	855	855	855
	Projection	487	482	482	480	535	554	573
	Surplus	368	373	373	375	320	301	282
	Surplus Percentage	43%	44%	44%	44%	37%	35%	33%
2029/2030	Capacity	855	855	855	855	855	855	855
	Projection	500	479	488	487	472	549	569
	Surplus	355	376	367	368	383	306	286
	Surplus Percentage	42%	44%	43%	43%	45%	36%	33%
2030/2031	Capacity	855	855	855	855	855	855	855
	Projection	502	492	491	495	483	492	561
	Surplus	353	363	364	360	372	363	294
	Surplus Percentage	41%	42%	43%	42%	44%	42%	34%

Key: Green = 5%+ spare capacity (red text = 15%+); yellow = 5% spare capacity; amber = less than 5% spare capacity; red = shortfall

Primary Planning Area 5

Wards	Cricklewood & Mapesbury, Dollis Hill and Willesden Green
PA5 Schools	Anson Primary School, Avigdor Hirsch Torah Temimah Primary School, Braintcroft E-ACT Primary Academy, Convent of Jesus and Mary Infant School, Gladstone Park Primary School, Mora Primary School, Northview Primary School, Our Lady of Grace Infant and Nursery School, Our Lady of Grace RC Junior School, St Andrew & St Francis CE Primary School, St Mary Magdalen's RC Junior School.

Demand: The latest projections for Planning Area 5 show that there will be a small drop in demand over the next five years, but surplus capacity is comfortable for place planning purposes. Longer term projections, which are less reliable, indicate that demand will rise steadily, but demand is not expected to exceed supply at any time over the next 15 years.

Planned action: Anson Primary School has increased capacity in 2025 from 52 places per year to 56 places per year following a request from the Governing Board. There are no other current or planned actions in this planning area, although demand will be kept under review.

Table 9: Planning Area 5 2026 projections and capacity

PA 5	Dataset	Rec	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
2026/2027	Capacity	557	557	557	557	557	557	557
	Projection	466	477	512	504	519	490	517
	Surplus	91	80	45	53	38	67	40
	Surplus Percentage	16%	14%	8%	10%	7%	12%	7%
2027/2028	Capacity	557	557	557	557	557	557	557
	Projection	481	449	477	500	511	503	499
	Surplus	76	108	80	57	46	54	58
	Surplus Percentage	14%	19%	14%	10%	8%	10%	10%
2028/2029	Capacity	557	557	557	557	557	557	557
	Projection	467	463	455	465	506	495	511
	Surplus	90	94	102	92	51	62	46
	Surplus Percentage	16%	17%	18%	17%	9%	11%	8%
2029/2030	Capacity	557	557	557	557	557	557	557
	Projection	472	453	464	446	474	493	505
	Surplus	85	104	93	111	83	64	52
	Surplus Percentage	15%	19%	17%	20%	15%	11%	9%
2030/2031	Capacity	557	557	557	557	557	557	557
	Projection	472	459	459	458	458	460	501
	Surplus	85	98	98	99	99	97	56
	Surplus Percentage	15%	18%	18%	18%	18%	17%	10%

Key: Green = 5%+ spare capacity (red text = 15%+); yellow = 5% spare capacity; amber = less than 5% spare capacity; red = shortfall

Primary Planning Area 6

Wards	Brondesbury Park, Kilburn and Queens Park
PA6 Schools	Ark Franklin Academy, Carlton Vale Infant School, Christchurch CE Primary School, Islamia Primary School*, Kilburn Grange Primary School, Malorees Primary School, North West London Jewish Day School, Princess Frederica CE Primary School, Salusbury Primary School, St Mary's RC Primary School, The Kilburn Park Foundation School
	*Islamia Primary School is relocating to Primary Planning Area 4 from September 2027

Demand: Projections for Planning Area 6 show a slight decline in demand over the next year with demand then remaining stable for the following four years and in the future according to less reliable longer-term forecasts. There are some future developments which may affect the demand and supply in the area in the future. Islamia Primary School will relocate to a site in Planning Area 4 in September 2027 and this will remove 2FE of capacity from the area. As part of the South Kilburn regeneration programme, Carlton Vale Infant School and The Kilburn Park School Foundation are due to move into a new school building as a primary school (subject to formal consultation and Cabinet approval), which may attract additional demand. The building is planned to accommodate 1FE, although it is being designed so that it can be expanded to 2FE in the future if required. The number of schools in the planning area has reduced by one following the amalgamation of Malorees Infant and Junior Schools in April 2026 to become Malorees Primary School.

Planned action: This planning area will be kept under review to understand patterns of supply and demand, particularly in response to the two changes identified above.

Table 10: Planning Area 6 2026 projections and capacity

PA 6	Dataset	Rec	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
2026/2027	Capacity	575	575	575	575	575	575	575
	Projection	399	444	445	488	452	471	424
	Surplus	176	131	130	87	123	104	151
	Surplus Percentage	31%	23%	23%	15%	21%	18%	26%
2027/2028	Capacity	515	515	515	515	515	515	515
	Projection	403	393	439	483	481	449	446
	Surplus	112	122	76	32	34	66	69
	Surplus Percentage	22%	24%	15%	6%	7%	13%	13%
2028/2029	Capacity	515	515	515	515	515	515	515
	Projection	393	396	389	476	475	473	422
	Surplus	122	119	126	39	40	42	93
	Surplus Percentage	24%	23%	24%	8%	8%	8%	18%
2029/2030	Capacity	515	515	515	515	515	515	515
	Projection	396	386	391	425	468	470	450
	Surplus	119	129	124	90	47	45	65
	Surplus Percentage	23%	25%	24%	17%	9%	9%	13%
2030/2031	Capacity	515	515	515	515	515	515	515
	Projection	397	388	383	428	422	468	446
	Surplus	118	127	132	87	93	47	69
	Surplus Percentage	23%	25%	26%	17%	18%	9%	13%

Key: Green = 5%+ spare capacity (red text = 15%+); yellow = 5% spare capacity; amber = less than 5% spare capacity; red = shortfall

8. Secondary school place planning -

Year 7 demand over the next seven years is expected to reduce compared to the current levels as the lower number of primary aged pupils transfer to the secondary school phase. Demand is projected to be below the level of available capacity indicating sufficient capacity to meet Year 7 demand. There remains, however, pressure on some higher year groups. There are two year groups (Yr 10 and 11) in two specific academic years where surplus capacity is projected to be below our standard 5% operating margin, but demand is likely to continue to fall from 2030.

Brent has traditionally been a net exporter of secondary pupils, but has seen a recent increase in parental preference for Brent secondary schools due to the sustained quality of Brent schools. The percentage of Brent pupils offered an out-borough school on National Offer Day fell from a high of 28.3% in 2017 to 23.8% in 2025 and remained below 25% in 2026. These factors have been taken into consideration in the projection figures for secondary schools and it is possible future demand for individual schools could increase further.

Table 11: Year 7 projections and planned capacity

Year	Year 7 projected intake	Year 7 places available	Surplus	Surplus
2026/27	3229	3688	302	8.92%
2027/28	3272	3688	245	7.12%
2028/29	3238	3688	169	4.80%
2029/30	3188	3688	255	7.43%
2030/31	3130	3688	310	9.18%
2031/32	3092	3688	314	9.31%
2032/33	2961	3688	256	7.46%

Table 12 shows borough wide forecasts for all year groups and indicates that capacity is likely to fall below the operating margin of 5% in some year groups from 2027/28.

Table 12: Secondary projections 2026 and capacity

Whole borough	Dataset	Year 7	Year 8	Year 9	Year 10	Year 11
2026/2027	Capacity	3,688	3,688	3,688	3,688	3,745
	Projection	3229	3351	3492	3348	3417
	Surplus	459	337	196	340	328
	Surplus Percentage	14%	10%	6%	10%	10%
2027/2028	Capacity	3,688	3,688	3,688	3,688	3,688
	Projection	3272	3231	3395	3533	3364
	Surplus	416	457	293	155	324
	Surplus Percentage	13%	14%	9%	4%	10%
2028/2029	Capacity	3,688	3,688	3,688	3,688	3,688
	Projection	3238	3272	3284	3443	3568
	Surplus	450	416	404	245	120
	Surplus Percentage	14%	13%	12%	7%	3%
2029/2030	Capacity	3,688	3,688	3,688	3,688	3,688
	Projection	3188	3246	3331	3335	3486
	Surplus	500	442	357	353	202
	Surplus Percentage	16%	14%	11%	11%	6%
2030/2031	Capacity	3,688	3,688	3,688	3,688	3,688
	Projection	3130	3197	3308	3384	3382
	Surplus	558	491	380	304	306
	Surplus Percentage	18%	15%	11%	9%	9%
2031/2032	Capacity	3,688	3,688	3,688	3,688	3,688
	Projection	3092	3135	3255	3350	3426
	Surplus	596	553	433	338	262
	Surplus Percentage	19%	18%	13%	10%	8%
2032/2033	Capacity	3,688	3,688	3,688	3,688	3,688
	Projection	2961	3087	3184	3293	3386
	Surplus	727	601	504	395	302
	Surplus Percentage	25%	19%	16%	12%	9%

Key: Green = 5%+ spare capacity (red text = 15%+); yellow = 5% spare capacity; amber = less than 5% spare capacity; red = shortfall

8.1 Actions to respond to changes in demand

The North Brent School, which was approved by DfE in 2016 to provide 180 places per year (6 Form Entry), opened in September 2020 on a temporary site in Wembley, and then moved to its permanent site in Neasden operating at full capacity in September 2024.

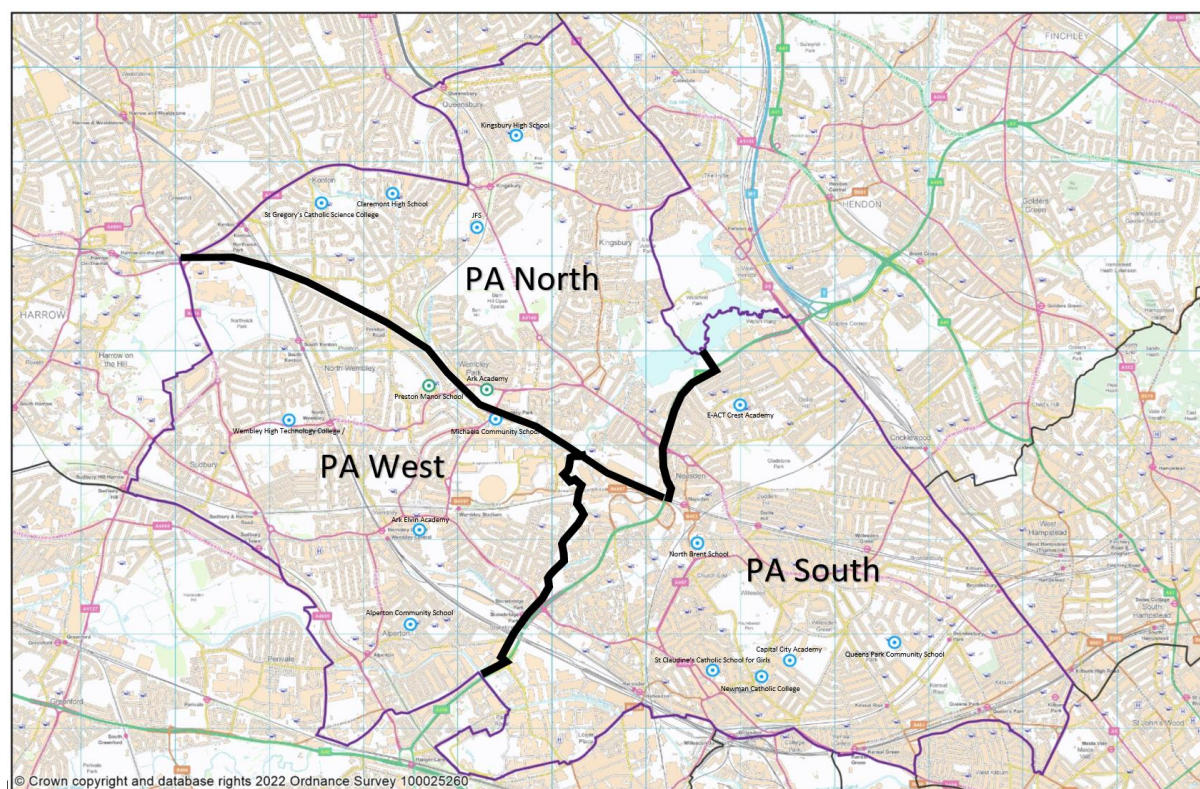
Some Brent secondary schools have previously expressed an interest in expanding should additional places be required to meet demand. It is unlikely this will be required during the life of this current strategy for Year 7 but is not something which has been formally ruled out and may need to be revisited for higher year groups. The Local Authority employs the strategy of working with schools with existing spare built capacity to open up that capacity where needed to ensure a sufficiency of places to meet in-year demand. This will be fully explored before any consideration is given to build new provision.

8.2 Secondary Planning Areas

Brent divides its secondary schools into 3 planning areas that reflect geographical groupings of schools – Secondary Planning Area North, Secondary Planning Area West and Secondary Planning Area South (Figure 5). As with primary planning areas, all secondary planning areas are aligned with the 2022 ward boundaries. This provides a clear picture of demand as GLA projections are also based on these wards.

Secondary aged children can be expected to travel longer distances to school. A reasonable offer for a secondary place is one within 3 miles of home, which given the size of Brent and the good transport links mean children can travel to any school within the borough. However, secondary planning areas allow localised pressures for schools to be taken into account and where additional places would help more children attend a school near to where they live.

Figure 5: Secondary Planning Areas



Secondary Planning Area North

Wards	Barnhill, Kenton, Kingsbury, Queensbury and Welsh Harp
Schools	Ark Academy, Claremont High School, JFS, Kingsbury High School, St Gregory's

Demand: Schools in Planning Area North are traditionally oversubscribed. However, the latest projections indicate demand is starting to fall in the area. Many year groups will continue to operate at capacity until the early 2030s with demand still exceeding supply, but we will start to see spare capacity entering the system from Year 7 in 2026/27. Planning Area North includes the Burnt Oak Colindale and Northwick Park growth areas.

Planned action: There are no planned actions in this area and demand will be kept under review. Spare places in Planning Area South will accommodate pressures in demand in this planning area, and the Fair Access Protocol will be implemented if required to manage demand for in-year places that cannot be fulfilled through normal admissions processes.

Table 13: Secondary Planning Area North 2026 projections and capacity

PA 7 - North	Dataset	Year 7	Year 8	Year 9	Year 10	Year 11
2026/2027	Capacity	1,278	1,278	1,278	1,278	1,278
	Projection	1252	1327	1352	1298	1279
	Surplus	26	-49	-74	-20	-1
	Surplus Percentage	2%	-4%	-6%	-2%	0%
2027/2028	Capacity	1,278	1,278	1,278	1,278	1,278
	Projection	1260	1264	1339	1370	1311
	Surplus	18	14	-61	-92	-33
	Surplus Percentage	1%	1%	-5%	-7%	-3%
2028/2029	Capacity	1,278	1,278	1,278	1,278	1,278
	Projection	1261	1273	1280	1354	1392
	Surplus	17	5	-2	-76	-114
	Surplus Percentage	1%	0%	0%	-6%	-9%
2029/2030	Capacity	1,278	1,278	1,278	1,278	1,278
	Projection	1226	1273	1290	1298	1374
	Surplus	52	5	-12	-20	-96
	Surplus Percentage	4%	0%	-1%	-2%	-8%
2030/2031	Capacity	1,278	1,278	1,278	1,278	1,278
	Projection	1200	1240	1288	1304	1320
	Surplus	78	38	-10	-26	-42
	Surplus Percentage	6%	3%	-1%	-2%	-3%
2031/2032	Capacity	1,278	1,278	1,278	1,278	1,278
	Projection	1186	1212	1255	1298	1327
	Surplus	92	66	23	-20	-49
	Surplus Percentage	7%	5%	2%	-2%	-4%
2032/2033	Capacity	1,278	1,278	1,278	1,278	1,278
	Projection	1132	1191	1222	1265	1318
	Surplus	146	87	56	13	-40
	Surplus Percentage	11%	7%	4%	1%	-3%

Secondary Planning Area West

Wards	Alperton, Northwick Park, Preston, Sudbury, Tokyngton, Wembley Central, Wembley Hill and Wembley Park
Schools	Alperton Community School, Ark Elvin Academy, Michaela Community School, Preston Manor School, Wembley High Technology College

Demand: Projections indicate limited spare capacity in the short term in Planning Area West. Longer term forecasts indicate demand in all year groups will remain slightly below capacity, although many year groups will be operating at capacity. Some schools in the area are operating a lower PAN than their build capacity will allow, leading to an operational short-fall of places to meet in-year demand.

Planned action: The area includes two major growth areas in Wembley Central and Alperton. The planning area will remain under review to determine whether any actions are required to increase capacity. Spare places in Planning Area South can accommodate pressures in the short to medium term. Fair Access Protocols will be implemented if required to manage demand for in-year places that cannot be fulfilled through normal admissions processes.

Table 14: Secondary Planning Area West 2026 projections and capacity

PA 8 - West	Dataset	Year 7	Year 8	Year 9	Year 10	Year 11
2026/2027	Capacity	1,176	1,176	1,176	1,176	1,233
	Projection	1104	1121	1168	1156	1196
	Surplus	72	55	8	20	37
	Surplus Percentage	6%	5%	1%	2%	3%
2027/2028	Capacity	1,176	1,176	1,176	1,176	1,233
	Projection	1146	1098	1155	1186	1168
	Surplus	30	78	21	-10	65
	Surplus Percentage	3%	7%	2%	-1%	5%
2028/2029	Capacity	1,176	1,176	1,176	1,176	1,176
	Projection	1129	1139	1139	1181	1204
	Surplus	47	37	37	-5	-28
	Surplus Percentage	4%	3%	3%	0%	-2%
2029/2030	Capacity	1,176	1,176	1,176	1,176	1,176
	Projection	1124	1128	1181	1165	1204
	Surplus	52	48	-5	11	-28
	Surplus Percentage	4%	4%	0%	1%	-2%
2030/2031	Capacity	1,176	1,176	1,176	1,176	1,176
	Projection	1107	1120	1173	1210	1188
	Surplus	69	56	3	-34	-12
	Surplus Percentage	6%	5%	0%	-3%	-1%
2031/2032	Capacity	1,176	1,176	1,176	1,176	1,176
	Projection	1101	1101	1162	1196	1228
	Surplus	75	75	14	-20	-52
	Surplus Percentage	6%	6%	1%	-2%	-4%
2032/2033	Capacity	1,176	1,176	1,176	1,176	1,176
	Projection	1057	1091	1139	1181	1212
	Surplus	119	85	37	-5	-36
	Surplus Percentage	10%	7%	3%	0%	-3%

Key: Green = 5%+ spare capacity (red text = 15%+); yellow = 5% spare capacity; amber = less than 5% spare capacity; red = shortfall

Secondary Planning Area South

Wards	Brondesbury Park, Cricklewood & Mapesbury, Dollis Hill, Harlesden & Kensal Green, Kilburn, Roundwood, Queens Park, Stonebridge and Willesden Green
Schools	E-ACT Crest Academy, Harris Lowe Academy Willesden, Newman Catholic College, North Brent School, Queens Park Community School, St Claudine's Catholic School for Girls

Demand: Projections for Planning Area South show there is sufficient availability of places to meet demand. The availability of places in this planning area means that children living in the North or West planning areas, who may not have been successful in gaining a place at schools in their own planning areas, may be offered schools in the South, particularly if the applications are made in-year. The widespread nature of transport links in Brent means it is possible for pupils to easily travel between planning areas to attend schools further away but remain within recommended journey times.

Planned action: The LA will continue to hold discussions with schools operating below their built capacity with a view to making additional places available as necessary to respond to in-year demand. The Planning Area will remain under review to determine if any longer-term changes are required.

Table 15: Secondary Planning Area South 2026 projections and capacity

PA 9 - South	Dataset	Year 7	Year 8	Year 9	Year 10	Year 11
2026/2027	Capacity	1,234	1,234	1,234	1,234	1,234
	Projection	873	903	972	894	942
	Surplus	361	331	262	340	292
	Surplus Percentage	29%	27%	21%	28%	24%
2027/2028	Capacity	1,234	1,234	1,234	1,234	1,234
	Projection	866	869	901	977	885
	Surplus	368	365	333	257	349
	Surplus Percentage	30%	30%	27%	21%	28%
2028/2029	Capacity	1,234	1,234	1,234	1,234	1,234
	Projection	848	860	865	908	972
	Surplus	386	374	369	326	262
	Surplus Percentage	31%	30%	30%	26%	21%
2029/2030	Capacity	1,234	1,234	1,234	1,234	1,234
	Projection	838	845	860	872	908
	Surplus	396	389	374	362	326
	Surplus Percentage	32%	32%	30%	29%	26%
2030/2031	Capacity	1,234	1,234	1,234	1,234	1,234
	Projection	823	837	847	870	874
	Surplus	411	397	387	364	360
	Surplus Percentage	33%	32%	31%	29%	29%
2031/2032	Capacity	1,234	1,234	1,234	1,234	1,234
	Projection	805	822	838	856	871
	Surplus	429	412	396	378	363
	Surplus Percentage	35%	33%	32%	31%	29%
2032/2033	Capacity	1,234	1,234	1,234	1,234	1,234
	Projection	772	805	823	847	856
	Surplus	462	429	411	387	378
	Surplus Percentage	37%	35%	33%	31%	31%

Key: Green = 5%+ spare capacity (red text = 15%+); yellow = 5% spare capacity; amber = less than 5% spare capacity; red = shortfall

9. SEND and Alternative Provision place planning

9.1 Brent SEND Overview

Brent is a borough that has high aspirations for all children and young people with special educational needs or disabilities (SEND). This was recognised by Ofsted during Brent's SEND Area Inspection in January 2025: "Leaders across the partnership understand very well the needs of children and young people with SEND and their families. They have high ambitions and a relentless focus to continue to improve services for children and young people who have SEND". Services, schools and settings are needs-led and follow the ethos of early identification and early intervention. Brent and local schools recognise SEND is not a fixed or permanent characteristic. At a specific time, a child might have additional learning needs that require tailored or additional support to fully participate in everything the school has to offer, or they may require more specialist support in school for the whole of their education.

All schools in Brent are inclusive and where possible a child or young person should be educated in their local mainstream school. Additional Resourced Provision Places (ARPs) are for children who can access, and will benefit from, significant engagement with a mainstream school offer. A child with 'special' listed as Type in Section I of their EHCP is entitled to a place at a special school whilst ARPs have a mainstream designation. Therefore, children with 'special' named as type in Section I should not be placed in an ARP unless parental preference is for mainstream. The majority of pupils' additional needs can be met within one of the following contexts listed in Table 16 with only those not able to access their education in a mainstream school being met through a special school.

Table 16: The range of provision in Brent

A FULL RANGE OF PROVISION			
Fully inclusive mainstream provision	Mainstream with support	Additionally resourced mainstream provision	Brent special school provision

There is a range of high-quality provision for children with SEND in Brent encompassing 4 enhanced pre-school providers, 1 primary special maintained school, 1 primary special academy school, 2 special all through academy schools and 2 secondary special school academies, and a number of Additionally Resourced Provisions (ARP) in both primary and secondary mainstream schools.

An ARP is designed to provide specialist and targeted support for children with special educational needs and/or disabilities who can function well in a mainstream school, and where the school has appropriate teaching and learning strategies and staff with the skills and knowledge in a particular area of SEND. ARPs also provide specialist environments which support the learning needs of each pupil, and many young people with additional learning needs can make better, and more sustained progress when they attend mainstream schools. Table 17 details Brent's special school places and Table 18 details Brent's ARP places.

Table 17: Special School PANs 2026/27

School	Type of Provision	Type of School	Special Need	Specialist places 2026/27
*The Manor School	Special	Primary	Communication and Interaction	264 (274 from January 2027)
*The Avenue	Special	All-through	Communication and Interaction	132
Phoenix Arch School	Special	Primary	Communication and Interaction	55
+The Village School	Special	All-through	Communication and Interaction and additional learning difficulty	315
*Wembley Manor	Special	Secondary	Communication and Interaction and additional learning difficulty	135
+Woodfield School	Special	Secondary	Communication and Interaction	200
			Total	1101 (1111 from January 2027)

*The Manor, Wembley Manor and The Avenue schools form the RISE Academy Trust. Children attending satellite provision of

+The Village and Woodfield schools form the Compass Learning Partnership Multi-Academy Trust.

Table 18: Additionally Resourced Provision places 2026/27

School	Type of Provision	Type of School	Special Need	Places 2026/27
Kingsbury Green Primary	ARP	Primary	Hearing Impairment	32
Oakington Manor Primary School	ARP	Primary	Communication and Interaction	25
Fryent Primary School	ARP	Primary	Communication and Interaction	50
Preston Manor High School	ARP	Secondary	Communication and Interaction	12
Preston Manor High School	ARP	Secondary	Communication and Interaction	12
Carlton Vale Infant School	ARP	Primary	Communication and Interaction	10
Kilburn Park Junior School	ARP	Primary	Communication and Interaction	16
Newfield Primary School	ARP	Primary	Communication and Interaction	15
St Margaret Clitherow	ARP	Primary	Communication and Interaction	16
Newman Catholic College	ARP	Secondary	Communication and Interaction	12
Preston Park	ARP	Primary	Communication and Interaction	21
Ark Elvin	ARP	Secondary	Moderate Learning Difficulty	12 (25 from January 2027)
Elsley	ARP	Primary	Communication and Interaction	10
			Total	243 (256 from January 2027)

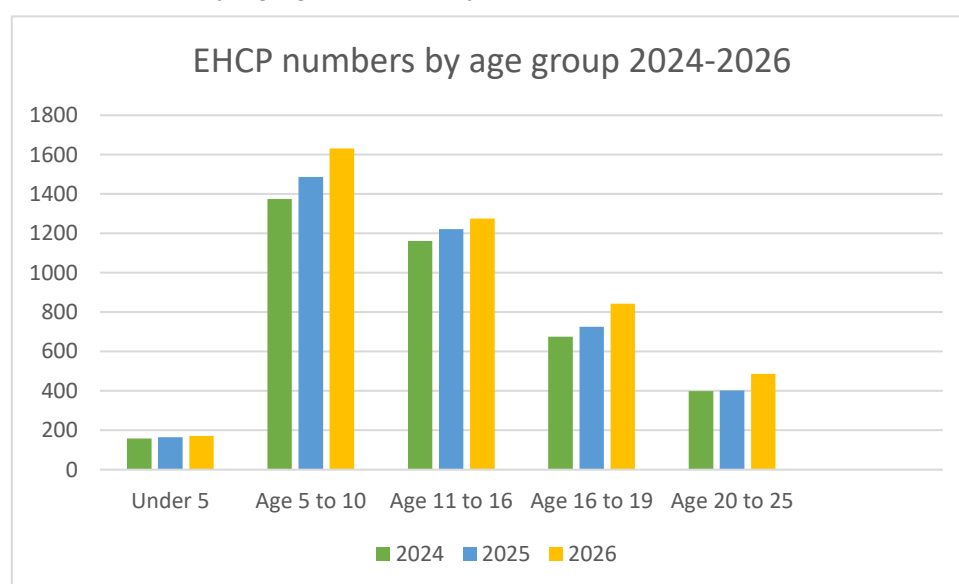
From September 2026 there were 1101 places in Brent special schools and 243 ARP places (48 in secondary, 195 in primary). These represent an increase of 13% for special school places but a reduction of 2.8% for ARP places since the 2025/26 academic year. The reduction in ARP places has resulted from one school opting to close their ARP (loss of two places), and one ARP reducing their place number as they have struggled to fill places (loss of 13 places). To balance this, one school has expanded their ARP by 8 places.

Other boroughs can apply for places in Brent schools (in the same way that Brent children and young people occupy spaces in special schools in other boroughs). The percentage of out of borough (OOB) children and young people with SEND placed in Brent special schools and ARPs will vary year on year. However, the current figure stands at 15% of Brent's total capacity. As a result, it can be assumed that if this rate remains the same, Brent will have access to 936 local special school places and 207 of the 243 ARP places in Brent schools from September 2026.

As of August 2026, there are 4408 children and young people living in Brent aged 0-25 with an Education, Health and Care Plan (EHCP). Of these, 2908 are statutory school age, or 6.1% of the school population (similar to national levels, which currently sit at 6%). 13.3% of pupils are identified with additional needs that can be met at SEN support where a need is identified but does not meet threshold for an EHCP (compared to 14.8% nationally).

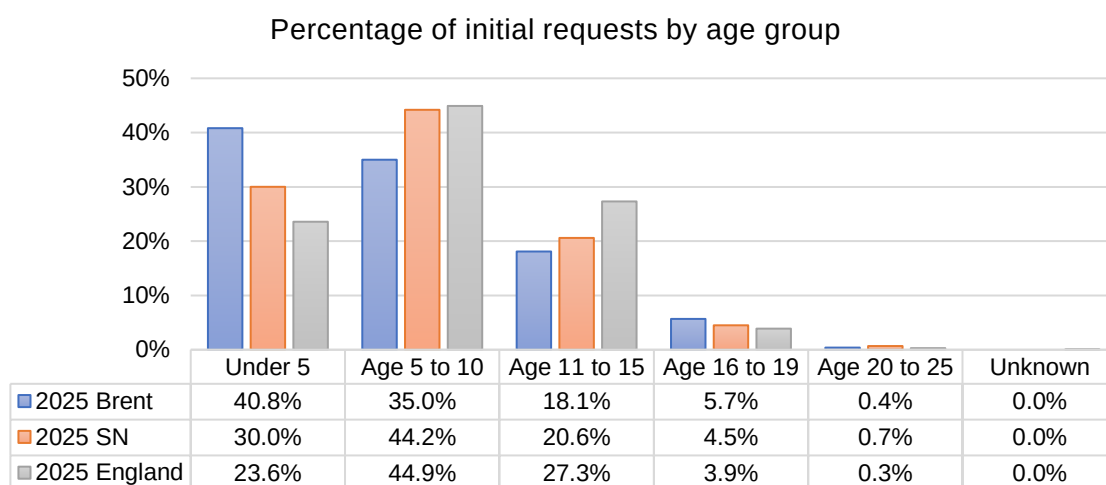
In the last year, the number of EHCPs has increased across all age groups, but not consistently. The age groups with the highest increases in EHCP numbers were the 20-25 and 16-19 age groups, which saw increases of 22.2% and 15.3% respectively. The breakdown of EHCPs by age group is shown in Figure 6, below.

Figure 6: EHCP numbers by age group for the years 2024, 2025 and 2026



In terms of education and health care needs assessments (EHCNAs), Figure 7, below, provides a breakdown by age group of EHCNAs in Brent as compared with our Statistical Neighbours and England average. As can be seen, Brent's rate of EHCNAs for the under 5s remains significantly higher than either our Statistical Neighbours (SN) or England average, placing pressure on specialist provision in the early years and of significance when it comes to forecasting future need for specialist provision.

Figure 7 EHCNA requests by age group for Brent, Brent's statistical neighbours (SN) and England for the 2025 calendar year (most recent SEN2 reporting period)



When compared with 2025 data, the needs profile of Brent's children with an EHCP has remained relatively stable. Needs associated with communication and interaction (CI), which includes children with autism spectrum condition (ASC) and speech, language and communications needs (SLCN), predominate with 59% of the cohort having CI as their primary area of need. This is an increase of 1% in this category within the last calendar year. The predominance of CI as the most commonly occurring primary need in Brent's EHCP cohort looks set to continue with the Early Years SEND team reporting 75-85% of their referrals over a 12-year period being for concerns regarding CI development. This is a national trend and is not unique to Brent. After C&I, the next most commonly occurring primary needs is cognition and learning (C&L) at 23% followed by social, emotional and mental health (SEMH) at 11%, and sensory and other (including physical) needs at 7%.

9.2 Where Brent children with special needs and EHC Plans attend school

Ongoing targeted work to support schools and settings to better meet the needs of children with SEND has seen an increase in the number of children remaining within mainstream education in Brent. However, despite increasing confidence in the mainstream sector to meet the needs of children and young people with SEND, and significant investment by Brent to increase the capacity within special educational settings and ARPs in the borough, additional special school places are required. Key numbers are as follows:

- 48% of all children with an EHCP in Brent attend a mainstream school provision. This is the same percentage as in 2025.
- However, in terms of age-groups, 39% of primary aged children and 43% of secondary aged children with an EHCP require a special school place. Numerically this is expressed as 741 and 543 children respectively.
- Communication and Interaction is the area of need most strongly correlated with placement in special for both primary and secondary aged children with an EHCP in Brent, followed by Cognition and Learning for both age groups.

Brent currently has 225 children in mainstream schools awaiting a place in special (an increase of 49% since this time last year).¹ Of these 225, 198 are primary age and 27 are secondary age. Additionally, Brent currently has 22 children unplaced and receiving home tuition whilst a placement is sought (a 32% increase since this time last year). Of these 22, 14 are primary aged and 8 are secondary aged. The primary need of the majority of these children is communication and interaction, accompanied by cognition and learning needs. However, in the last year there has been a slight increase in children with significant physical needs accessing their education via home tuition. As part of Brent's response to this increase, consideration is being given to development of 'assessment' places at one of our Brent special schools to ensure that all children are supported to access appropriate education.

198 Brent pupils with EHCPs attend out-of-borough maintained special schools (a decrease of 0.5% since this time last year). This represents 7% of Brent's school age children with an EHCP. Additionally, 214 children attend independent schools (an increase of 9% since last year), at a cost of £13.7m per annum (a 15% increase on equivalent spend from last financial year). This represents 7% of Brent's school age children with an EHCP. The use of independent places has increased along with the cost of each place meaning that cost pressures associated with independent places have increased disproportionately to the percentage increase in places used. The transport costs for Brent children with an EHCP attending out of borough and independent provisions is circa. £6m per annum.

Given the above, if all Brent children were to access a place at a maintained, in-borough special school, Brent would require a total of 1284 places (741 primary and 543 secondary), with the majority of these places being for children who have either communication and interaction or cognition and learning as their primary area of need. Brent currently has 505 places in primary age special school classes and 596 places in secondary age special school places. Of these places, 15% are occupied by children from other boroughs, leaving 429 primary places available and 507 secondary places available. Given this, Brent has a current shortfall of 312 primary places in special and 36 secondary places in special. As outlined above, to prevent Brent children with EHCP being unplaced, the independent sector, home tuition, out of borough schools and the mainstream sector are all currently being utilised.

The current number of special school places required for primary school aged children is greater than that forecast in August 2025 by 56 places/8%, pointing to rising needs in this cohort. Conversely, the number of special school places required for secondary school aged children is less than that forecast in August 2025 by 109/15%. This is likely to be a result of improved inclusive practice in secondary schools and an increase in the number of ARP places at secondary, increasing confidence across the system in the ability of mainstream secondary schools to meet a wider range of needs.

There has been significant growth in secondary special school places in Brent over the last year, meaning that Brent's current availability of secondary special school places exceeds what was forecast in August 2025 by 43 places. However, the same cannot be said of primary school

¹ This increase is attributable in large part to greatly improved data accuracy in this area.

places. Brent's current availability of primary special school places has not achieved what was forecast in August 2025, being 127 places fewer. This is due to delays in creating additional school places at both the Strathcona and Manor sites.

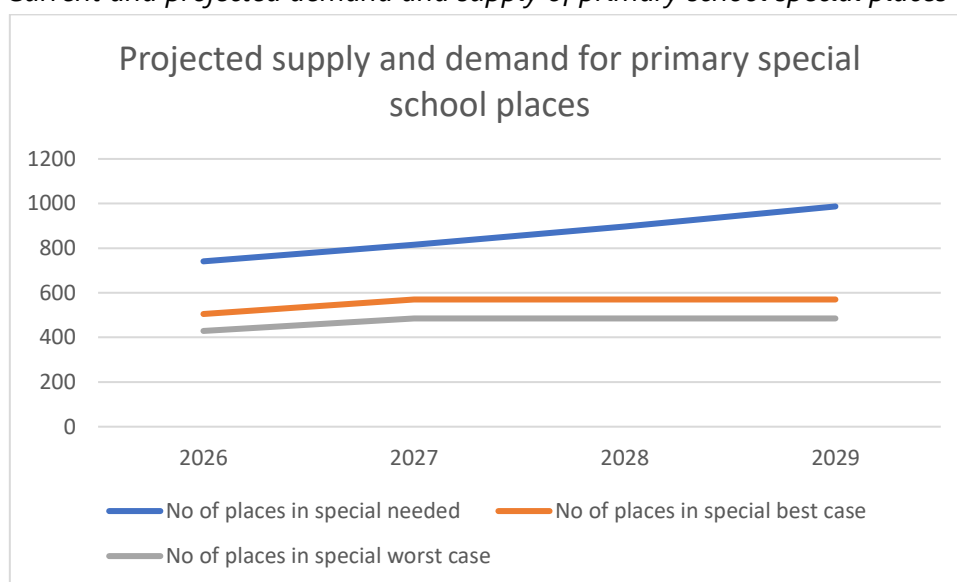
Table 20 and Figure 7 below, depict the current and projected need for primary special school places (all areas of need) within Brent over the time period of 2026-2029. In terms of demand, Table 20 and Figure 8 assume 10% annual growth in EHCP numbers (based on current annual growth trends and agreed mitigations) and 39% of primary aged children with an EHCP requiring a place in special.

In terms of supply, Table 20 and Figure 8 model a best-case scenario (whereby all of Brent special school places are available to Brent children) and a worst-case scenario (whereby 85% of Brent special school places are available to Brent children). The worst-case scenario is more reflective of current occupancy levels by out of borough children.

Table 19: Current and projected demand and supply of primary school special places in Brent

	2026	2027	2028	2029
No of places in special needed	741	815	897	987
No of places in special best case	505	570	570	570
No of places in special worst case	429	485	485	485
Shortfall best case	236	245	327	417
Shortfall worst case	312	330	412	502

Figure 8: Current and projected demand and supply of primary school special places in Brent

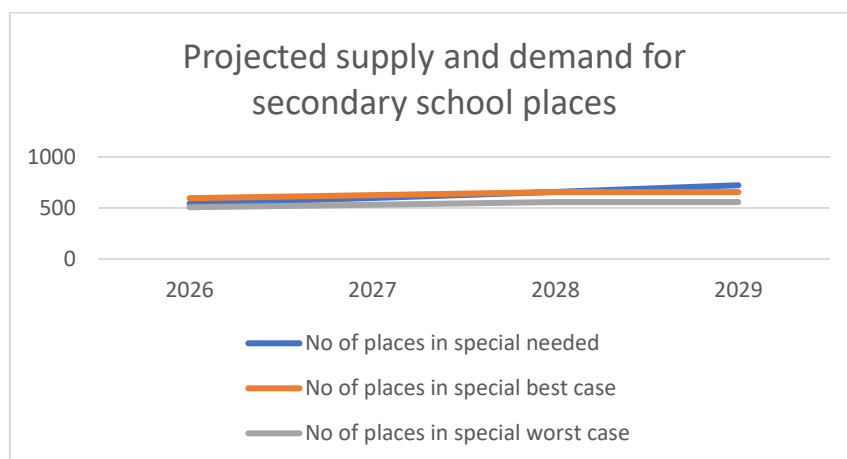


Current and projected (until 2029) need for special school places at secondary are shown in Table 21 and Figure 8 below. The same assumptions are made for this data set as for the primary age data set (with the exception that an assumption of 43% of total secondary aged EHCP cohort requiring special is made).

Table 20: Current and projected demand and supply of secondary school special places in Brent

	2026	2027	2028	2029
No of places in special needed	543	597	657	723
No of places in special best case	596	626	656	656
No of places in special worst case	507	532	558	558
Shortfall best case	n/a	n/a	1	67
Shortfall worst case	36	65	99	165

Figure 9: Current and projected demand and supply of secondary school special places in Brent



9.3 Planned action

In January 2022 Cabinet approved £44m of capital investment for additional specialist places in a new secondary special school, expansions of existing special schools and new ARPs in mainstream schools. In January 2026, Cabinet approved a further £9m capital spend to deliver an additional 212 special school places. The key projects within this strategy are identified in Table 22, below. This table details the planned expansion of special school places in Brent 2025-2027, subject to relevant consultations. Academy expansions will be subject to school consultation with the DfE Regional Director. Brent Cabinet have approved the expansion of Phoenix Arch school on the Strathcona site, which will be delivered in 2027/28. (note: places that will be available in the 25/26 academic year are already captured in Table 17, above, and so are not also stated in Table 22 to prevent duplication).

Table 21: Additional special school provision for Brent 2025-2027

School	Places	Phase	Delivery time scale
Woodfield school*	40	Secondary	January 2027
The Avenue	34	All-through	September 2027
Strathcona site	50	Primary	September 2027
The Manor School	88	Primary	September 2026
The Village School	80 (but net gain of 40)	All-through (but places are for secondary)	TBC (modelled for delivery 2028)
Total	212 (138 primary, 74 secondary)		

**Woodfield places are being delivered during the Phase 2 Capital works programme but were agreed as part of Phase 1. Therefore, these 40 places do not count towards the Phase 2 total.*

9.4 Summary of need

As can be seen from Tables 20, 21 and 22 and Figures 8 and 9, the planned expansion of specialist school places in Brent, even if delivered on time, do not meet Brent's current or projected need for places in primary. For secondary cohorts, Brent is closer to sufficiency until 2028 (depending on occupancy levels by out of borough students, which varies between schools and year groups). The modelling indicates that Brent has an immediate need to plan for further special school places (at least 348 across primary and secondary) to reduce further spend on out-of-borough placements, and officers will continue to work to develop further options to expand. A 'Phase 3' capital plan is currently in development, with a clear focus on delivering additional primary special school places at pace. It is likely to propose a significant expansion of 100-120 places in ARPs, alongside the development of an 80-100 place special school that could also act as a centre of excellence for training and staff development to support inclusive practice in Brent's mainstream schools. The aim is to use spare capacity in the local mainstream sector as a result of falling school rolls to meet this need.

It should be noted that Brent, like all LAs, is currently in the midst of significant SEND reforms in response to the Government's 2026 white paper 'Every Child Achieving and Thriving'. This paper proposes significant changes to the SEND system, many of which will take effect from September 2026 onwards and will influence the future demand for school places and associated actions to meet them.

9.5 Alternative provision

The Council has a statutory duty to arrange suitable full-time education for permanently excluded pupils, and for other pupils who because of illness or other reasons would not receive suitable education without such provision. In Brent there are two pupil referral units (PRUs) that are maintained by the Local Authority to provide sufficiency and meet statutory duties. These are Brent River College (BRC) for permanently excluded pupils and Ashley College for pupils who require alternative provision due to medical needs.

For pupils in Key Stages 1, 2 and 3 at risk of a permanent exclusion who have complex needs, Brent Council commissions two providers, Brent River College and The Pears Family School for pupils requiring time limited placements. Roundwood School and Community Centre, an alternative provision free school, is also another provision that adds to the sufficiency of alternative provision in the borough. Brent River College is heavily over-subscribed at primary level (Key Stages 1 and 2) offering 7 spaces intended for short-term respite, but which are currently occupied by primary aged children with an EHCP and who have significant SEMH needs.

The overall exclusion figures for all Brent pupils for the academic year 2025/26 remains low with 23 students permanently excluded. This figure is consistent with the 2024/25 academic

year figure (22 permanent exclusions) and highlights the strong and positive impact of Brent's inclusion support team. The increasing number of children with complex social, emotional and mental health issues (SEMH) and pupils experiencing Emotional Based School Avoidance (EBSA) has highlighted a shortfall in provision for this cohort, especially for primary aged pupils for whom there is no provision, and the offer is to be taught within their home. This need will be considered as part of wider school place planning considerations.

9.6 Post-16 Provision

The government drive for improved engagement post-16 in supported employment and more paid employment opportunities has placed an additional focus on local authorities to drive forward an expansion in supported internships and opportunities for young people to prepare for adulthood through employability skills and work experience. As the number of young people with an EHCP continues to grow, the demand in this area will continue.

There is an expectation in the 2014 SEND Code of Practice that a full range of opportunities must be provided to support young people to become visible, active members of society. The Council is currently developing a specialist post-16 SEND provision to meet this demand for places for young people with SEND. A new Post-16 Skills Resource Centre, the 'Welsh Harp Environmental Education Centre', located at Welsh Harp was agreed by Cabinet in May 2023 and is aimed at addressing the current lack of in-borough provision for young people aged 16-25 with SEND. The Welsh Harp facility is projected to open in September 2027 and will offer dedicated land-based skills training in response to requests from both students and their families for this type of offer, and skills deficits such as arboriculture. A partnership wide Supported Employment Forum has been established to ensure that the offer developed for young people is meaningful and sustainable.

The Council, working with anchor organisations, has expanded the offer of supported internships. In the 2025/26 academic year, 18 Brent students enrolled on the supported internship scheme, across 9 different placements. Plans are being developed as part of the SEND strategy re-refresh to further increase the breadth of placement opportunities available to Brent students, including at the new Welsh Harp centre in due course.

In terms of wider post-16 provision, the Local Authority works in partnership with schools and the College of North West London to ensure that there is a wide range of courses to meet local demand including for SEND pupils. The College of North West London is currently developing a new site in Wembley Park that will focus on courses related to the built environment and courses that meet the emerging skills needs across the borough, with provision for young people with SEND.

10. Conclusion

This third refresh confirms that Brent has sufficient mainstream school capacity overall, but that demand is unevenly distributed and continues to change across the borough. Primary

pupil numbers are forecast to fall over the next five years, creating significant surplus capacity in some planning areas, while growth and localised pressures may require additional capacity elsewhere. Secondary demand is expected to reduce overall, although some planning areas and year groups will continue to experience pressures.

Increasing local specialist provision remains a significant priority. Despite substantial investment and planned expansion, current and projected demand for special school places, particularly for primary-aged pupils, exceeds available local capacity. Further action through the SEND capital programme will be required to increase specialist provision, reduce reliance on out-of-borough and independent placements and enable more children and young people with SEND to access suitable education closer to home and their support networks.

The Council will continue to work closely with schools, trusts, dioceses and other partners to manage these changes. This will include supporting the sustainability of schools experiencing falling demand, retaining sufficient flexibility to respond to housing growth and pupil mobility, and considering proportionate changes to capacity where necessary, whilst ensuring the Brent school estate can support current and future educational use.

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Brent School Place Planning Strategy 2024 – 2028

First edition – Published October 2023

First refresh – Published November 2024

Second refresh – Published November 2025

Third refresh – Published November 2026

www.brent.gov.uk/education-schools-and-learning/school-admissions/school-place-planning-strategy-2024-2028

To request a copy, including accessible copies, please e-mail school.admissions@brent.gov.uk

	Cabinet 9 November 2026
	Report from the Corporate Director, Residents and Housing Services
	Lead Member - Cabinet Member for Housing, Homelessness and Renters (Councillor Robert Johnson)
Rent Setting Policy Statement	

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
List of Appendices:	Two Appendix A: Rent Setting Policy Statement Appendix B: Information for Calculating Formula Rents (Policy's Appendix A)
Background Papers:	N/A
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Spencer Randolph, Director Housing Services 020 8937 2546 Spencer.randolph@brent.gov.uk

1.0 Executive Summary

- 1.1. This report seeks Cabinet's approval of Brent's Rent Setting Policy. The policy establishes the framework through which rents for Housing Revenue Account (HRA) properties will be set, reviewed and varied in accordance with the Regulator of Social Housing's Rent Standard 2026 and associated guidance.
- 1.2 The policy also sets out the Council's approach to rent setting on re-let, London Affordable Rent properties, rent convergence and the future application of rent flexibilities where permitted by regulation.
- 1.3 The proposed policy will support the long-term financial sustainability of the HRA while ensuring that rents are set transparently and in accordance with regulatory requirements. The recommendations will enable the Council to maximise rental income within the framework permitted by national rent policy.

2.0 Recommendation(s)

Cabinet is recommended to:

- 2.1 Approve Brent Council's new Rent Setting Policy attached as Appendix A.
- 2.2 Approve all social rent properties being re-let at full formula rent, subject to compliance with the Rent Standard 2026 and any applicable rent caps or regulatory requirements.
- 2.3 Approve ending discounted London Affordable Rent levels on re-let, with eligible properties being let at the full London Affordable Rent applicable at the commencement of each new tenancy.
- 2.4 Note that proposals relating to rent flexibilities will be brought back for consideration as part of this financial year's budget report, following consultation with residents.

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 This Rent Setting Policy Statement sets out Brent Council's commitment to ensuring that council rents are set fairly, transparently and in accordance with national regulations. As a registered housing provider, we must comply with the Regulator of Social Housing's Rent Standard 2026. This policy provides a clear framework for determining rents, promoting consistency across our housing stock while meeting our legal and regulatory responsibilities.
- 3.1.2 At the heart of this policy is our commitment to fairness and maintaining affordable homes for tenants. Residents deserve confidence that rents for similar homes are set consistently and that all rent decisions are made in an open and accountable way. This policy helps ensure that tenants are charged the correct rent for their property while providing greater transparency about how those decisions are made.
- 3.1.3 Rental income is the primary source of funding for the Housing Revenue Account, which pays for the management, maintenance, repair and improvement of council homes. Ensuring rents are set correctly and fairly helps safeguard vital investment in our housing stock, enabling us to maintain safe, secure and well-managed homes for residents while treating tenants consistently and equitably across the borough.

3.2 Background

- 3.2.1 Brent Council must set its rents for Council properties in line with the Rent Standard ([Rent Standard – April 2026](#)) which is set by the Regulator for Social Housing. The Rent Standard 2026 provides the maximum rents the Council can charge, and the rate of rent increase we can implement. There is some scope

for exercising discretion but in most cases, this relates to charging less than the limits imposed by the Rent Standard.

- 3.2.2 The Rent Setting Policy has been developed to be in-line with the Rent Standard 2026. In simplified terms, this breaks down what we can charge for Social Housing rents (around 85% of our tenancies) and Affordable rents, which are usually higher and apply to additional social housing we may have built or acquired. As well as setting out how the Council will set rents, the policy also explains the process for increasing rent and what flexibilities we have as a Council to increase the rent above the permitted rate.
- 3.2.3 With the adoption of this policy, it is also recommended that all social rent properties are re-let at full formula rent (the social rent level we are gradually moving our charges towards, sometimes called target rent), subject to compliance with the Rent Standard 2026 and any applicable rent caps or regulatory requirements. This is to ensure all social rent properties are let at the accurate rent level and treated consistently.
- 3.2.4 Furthermore, Brent has over 1,100 properties that fall into London Affordable rent, with more being built. In some cases, we have made some decisions to charge less than the London Affordable rent, such as in South Kilburn where many residents have been displaced from other local social housing. This is known as discounted London Affordable Rent. This report recommends ending discounted London Affordable Rent levels on re-let, with eligible properties being let at the full London Affordable Rent applicable at the commencement of each new tenancy. Similar to the reasoning for re-let at formula rent in paragraph 3.2.3, this is to ensure rents are treated consistently.
- 3.2.5 There are other charges that are outside the scope of this policy. Service charges are not covered by the same government guidelines as rent and are subject to separate legal requirements. The way the Council calculates and sets service charges will be covered in a separate specific housing policy on service charges. Moreover, methods of rent collection, enforcement of rents or arrears and debts are outside the scope of this policy.

4.0 Stakeholder and ward member consultation and engagement

- 4.1 Residents were consulted at the Brent Summer Roadshow 2026; a series of events where a range of housing, health and community services were brought directly to neighbourhoods across the borough. Staff sought feedback on the rent setting policy and asked residents about the clarity of the information we provided, preferred communication methods about rent and frequency of updates about their rent account.
- 4.2 Residents were also consulted on 26 August 2026 at the Residents Rent Panel on rent setting, rent flexibility and improvements. During the session, staff sought feedback on the rent increase table and how the Council shares rent setting information.

- 4.3 Feedback from residents indicates that transparency and clarity are most important to them. Their preference is for communications that clearly and simply explain rent increases and how rental income is spent by the Council, with more detailed information available in the policy online. In future, residents would like communications to include information on spending priorities.

5.0 Financial Considerations

- 5.1 Rental income is the primary source of funding for the Housing Revenue Account (HRA), supporting the management, maintenance, repair and improvement of the Council's housing stock. The proposed Rent Setting Policy provides a clear and consistent framework for setting rents in accordance with the Regulator of Social Housing's Rent Standard 2026 and supports the long-term financial sustainability of the HRA.
- 5.2 The recommendations to re-let social rent properties at full formula rent, subject to compliance with the Rent Standard 2026 and any applicable rent caps or regulatory requirements, and to end discounted London Affordable Rent levels on re-let, are expected to increase rental income over time as properties become vacant and are re-let. This will support the Council's ability to meet the increasing costs of managing and maintaining its housing stock and contribute towards the delivery of the HRA Business Plan.
- 5.3 Any costs associated with implementing and administering the policy will be met from existing HRA budgets and resources. The policy does not, in itself, commit the Council to the future use of any rent flexibilities permitted under the Rent Standard 2026. Any proposal to utilise such flexibilities would be subject to a separate decision and would be supported by a detailed assessment of the financial implications for both residents and the HRA.

6.0 Legal Considerations

- 6.1 The policy reflects the Council's statutory responsibilities under the Rent Standard 2026, Housing Act 1985, Housing Act 1996, Localism Act 2011 and other relevant legislation.
- 6.2 Local authorities in carrying out rent setting obligations must set rents in accordance with the regulation established by the Regulator of Social Housing's Rent Standard 2026 and the Government's current Policy Statement on Rents for Social Housing.
- 6.3 From 1 April 2026, the Direction on the Rent Standard 2026 on Rents for Social Housing replaced the previous 2019 and 2023 Directions and the policy statement issued on 14 December 2022.
- 6.4 For the process to be legally compliant, The Council must comply with all requirements and expectations set out in the Rent Standard 2026 and the Government's current rent policy. Failure to do so could result in regulatory action by the Regulator of Social Housing and may expose the Council to legal challenge

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 The policy does not discriminate against any protected characteristics, or disadvantage particular groups. The policy promotes consistency and fairness for rent setting at Brent.
- 7.2 Future consideration of rent flexibilities permitted by the policy will be subject to an equality impact assessment and resident engagement process.

8.0 Climate Change and Environmental Considerations

- 8.1 One aim of the climate emergency strategy is to improve energy efficiency in homes and buildings. This includes assessing possible energy measures in our housing stock, and in some cases retrofitting homes and buildings to make them more insulated. Local authorities can use the HRA to fund retrofitting and energy efficiency improvements for their council housing stock.

9.0 Communication Considerations

- 9.1 No corporate communication strategy or campaigns needed. For future tenants who move into a re-let property at full formula rent or London Affordable Rent, they will be informed about their rent levels through the relevant housing communication channels.
- 9.2 Feedback from residents in section 4.3 shows us how residents would like to see future communications on how rents are set and spent by the Council. Residents prefer communications that are short and easy to understand, with more detailed information available on the website.

Report sign off:

Thomas Cattermole

Corporate Director, Residents and Housing Services

Legal considerations provided by:
Fabian Peter, Senior Lawyer - Homelessness

Finance considerations provided by:
Michael Jarrett, Senior Finance Analyst

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London Borough of Brent

Rent Setting Policy Statement

This policy statement will outline how Brent Council will calculate, consult on and charge rent for Council-owned homes in the Housing Revenue Account. It will ensure rents for residential properties are fair, affordable and comply with legal and regulatory requirements.

Owner:	Spencer Randolph, Director of Housing Services	
Approved by:	DMT/Board/Cabinet	Insert date October 2026
Review cycle: (years)	3 years	
Next review date:	TBC	



Regulator:	<p>Regulator of Social Housing (RSH)</p> <ul style="list-style-type: none"> • Rent Standard 2026
Legislation:	<p>Rent Standard 2026</p> <ul style="list-style-type: none"> • The Rent Standard 2026 is the regulatory framework governing social housing rents in England from 1 April 2026, set by the Regulator of Social Housing – a body of government. <p>Policy statement on rents for social housing April 2026</p> <ul style="list-style-type: none"> • This policy was published by the Ministry of Housing, Communities and Local Government (a department of government). It sets out the government's policy on rents including increases for social housing <p>Section 24 Housing Act 1985</p> <ul style="list-style-type: none"> • The Act is a major piece of UK government legislation combining multiple previous housing laws. It manages the powers of local authorities to provide accommodation, among other things.
The policy also operates in the context of:	<ul style="list-style-type: none"> • Complaints Policy • Assignment and Succession Policy • Compensation Policy • Tenancy Policy • Service Charge Policy

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1.Purpose

1.1 This document will outline how we, Brent Council (the Council) will calculate, consult on and charge rent for Council-owned homes in the Housing Revenue Account (HRA)¹.

1.2 The purpose of this policy is to:

- Ensure rents for residential properties are fair, transparent and comply with legal and regulatory requirements;
- Ensure the HRA follows government legislation when setting rent;
- Explain key responsibilities of Brent Council stakeholders in the rent setting process

1.3 Appendix A of this policy gives more detail into specific formula rent calculations, and the values used to calculate formula rent.

2. Scope

2.1 This policy is intended for all HRA residential properties that the Council owns and has responsibility to maintain and manage that are let on secure tenancies.

2.2 The policy does not cover properties owned and managed within the Council's general fund housing service, HRA homes which are being used for temporary accommodation, student accommodation, care homes or homes owned, leased or managed by i4B, First Wave Housing or other individuals or entities. These types of properties are exempt from the Rent Standard and have their own rent setting policies.

2.3 This policy covers how we set rent levels. The ways we collect rent from tenants are not covered by this policy, nor is enforcement of rents or arrears, debts and service charges which is covered under our debt recovery and tenancy sustainment policies.

3.Background- Rent Standard explained

3.1 Local authorities and Housing associations are the main providers of social rents (also referred to as Registered Providers). Traditionally, social rents are associated with council-owned stock managed by local authorities, but Registered Providers also manage a substantial portion of social housing.

3.2 As a local authority, rents must be set in accordance with the Regulator for Social Housings published Rent Standard. The current Rent Standard can be found [here](#) . This section will explain the Rent Standard in more detail.

3.3 The Rent Standard is split into two key areas. Most rents charged by the Council (approximately 84%) are **Social Rents**. These apply to the majority of our Council homes and are generally used unless a property has been recently developed or acquired.

3.4 Formula Rents are part of the Social Rent element of the Rent Standard. The Rent Standard sets out the basis for calculating the formula rent (sometimes referred to as target rent) for each property. Since April 2002, all Local Authorities have been required to base rents on this formula, which takes into account the local average earnings, the property value (as of January 1999) and the property size measured by the number of bedrooms.

3.5 The formula is intended to ensure that rents are set fairly and consistently, reflecting both local affordability and the relative size and value of individual homes.

3.6 Rent Convergence - When the method of calculating formula rent was introduced, formula rent levels were generally higher than the rents charged for Local Authority properties. The government recognised that social housing tenants were typically paying lower rents than those in other housing sectors. To avoid significant increases in rents being introduced immediately, Local Authorities were permitted to increase rents gradually by more than inflation, where necessary, until they reached the formula rent level. This process became known as **rent convergence**.

3.7 More detail on rent convergence can be found in section 8 of this policy. However, this ended in 2016 when the government introduced a four year programme of annual rent reductions. As a result, many existing tenancies remained below formula rent. Since then, formula rent has generally only been charged when properties have been re-let, newly built or acquired and brought into the Council's housing supply.

3.8 Rent Cap - the rent cap is set nationally and sets the maximum Social Rent that can be charged for a property, based on its bedroom size. If the formula rent for a property is over the rent cap level, the rent charged must be limited to the rent cap amount. So, the rent cap acts as an upper limit, ensuring that rents do not exceed nationally prescribed levels regardless of the formula rent calculation.

3.9 Affordable rents - In response to concerns about the shortage of new social housing, the government introduced the Affordable Rent model in 2011. Unlike Social Rent, which is based on the national rent formula, Affordable Rent is linked to local market rents. Affordable Rent levels can be set at up to 80% of the market rent, inclusive of any service charges.

3.10 Once the initial Affordable Rent has been set, it can only be increased annually by the same percentage increase allowed for Social Rent properties. However, when a property is re-let, the rent can be reviewed and reset to the appropriate Affordable Rent level.

3.11 **London Affordable Rent (LAR)** was introduced by the Mayor of London and the Greater London Authority (GLA) to support the delivery of genuinely affordable housing across the capital. It was designed to provide rents that are more affordable than traditional Affordable Rent products, while also enabling councils and housing associations to secure the funding needed to build new homes.

3.12 For Brent, the use of London Affordable Rent has played a vital role in supporting the delivery of significant numbers of much-needed new affordable homes. Many recent and planned housing developments within the borough have only been made financially viable by using the London Affordable Rent model and the associated funding provided by the GLA.

3.13 Brent has over 1100 properties that fall into this category with more being built. In some cases, we have made some decisions to charge less than the London Affordable rent, such as the South Kilburn regeneration programme, where many of the residents have been displaced from other local social housing. This is known as discounted London Affordable Rent.

3.14 Once the initial affordable rent is set, this can only be increased by the same inflationary percentage increase allowed for social rents each year, unless there is a change of tenancy. In this instance, we can decide to reset at the appropriate affordable rent level.

4. Details of how rent levels are set

4.1 The Council's approach to rent setting is based on the principles of formula rent as set out in the Rent Standard 2026. Where permitted by legislation and regulatory guidance, rents may be adjusted through mechanisms such as rent convergence, rent flexibilities and re-let rent setting. In exercising these flexibilities, the Council will have regard to the impact on tenants alongside its obligations under the Rent Standard and other relevant statutory and regulatory requirements.

5. Social Rents

5.1 The application of a social rent is applicable to 84% of our portfolio. Formula Rent is the rent calculated using the Government's national formula for Social Rent properties. It provides a consistent method for calculating the rent for individual properties based on the value and size of the property and the level of earnings in the area.

5.2 The formula takes account of three factors:

- **Property value:** the value of the property at January 1999 prices;
- **Relative county earnings:** the average manual earnings for the county in which the property is located, compared with national average manual earnings; and
- **Property size:** the number of bedrooms in the property, through the application of a bedroom weight.

5.3 For properties in the London Borough of Brent, the relevant earnings figure is the **Greater London** figure specified by the Government. Brent does not have a separate earnings figure for the purposes of the formula.

How Formula Rent is calculated

5.4 The Government's formula is:

Weekly Formula Rent =

70% of the national average rent × relative county earnings × bedroom weight
plus

30% of the national average rent × relative property value

In simple terms, the calculation works as follows:

1. **70% of the national average rent** is adjusted to reflect the level of earnings in the area and the size of the property.
2. **30% of the national average rent** is adjusted to reflect the relative value of the property.
3. The two amounts are then added together to produce the property's Formula Rent.

5.5 The Government prescribes the figures to be used for the national average rent, average earnings, national average earnings, national average property value and bedroom weights. These figures are set out in **Appendix A** of this policy, as well as an example formula rent calculation.

Formula Rent and the amount of rent charged

5.6 Formula Rent provides the starting point for determining the Social Rent for a property. It is not necessarily the rent that will ultimately be charged.

5.7 When setting Social Rents, the Council must also comply with the applicable **rent cap** and the rent flexibility provisions contained in the Rent Standard 2026.

5.8 For a new tenant of a Social Rent property, the maximum initial rent is Formula Rent, subject to the applicable rent cap and the permitted rent flexibility. For general needs Social Rent properties, the Rent Standard does allow (if the prescribed

criteria is met) rent of up to **105% of Formula Rent**, subject to the rent cap. For supported housing, the permitted flexibility is up to **110% of Formula Rent**.

5.9 The Council's approach to rent flexibility, including whether and when it will set rents above Formula Rent, is set out separately in this policy.

Summary

5.10 The Formula Rent calculation can therefore be summarised as:

70% of national average rent
× **Greater London relative earnings**
× **bedroom weight**

PLUS

30% of national average rent
× **relative property value**

= Formula Rent

5.11 The resulting 2000-01 Formula Rent is then uprated using the Government's prescribed annual adjustments to establish the Formula Rent for the relevant year.

5.12 The Council will apply the Government's prescribed formula, values and bedroom weights when calculating Formula Rent and will ensure that the rent ultimately charged complies with the Rent Standard 2026.

5.13 In addition to the Formula Rent calculation, the Government sets a maximum rent cap based on the size of the property. The rent cap applies nationally and is not linked to local property values or income levels. Where the calculated Formula Rent exceeds the applicable rent cap, the rent charged must not exceed the rent cap amount.

6. Rent Setting on Re-let

6.1 When a property is re-let, the Council will set the rent in accordance with the Rent Standard 2026 and any applicable government guidance in force at the time. Where permitted by the Rent Standard, the rent for a re-let property may be increased to the formula rent level, subject to any applicable rent caps, rent flexibility limits and other regulatory requirements.

6.2 The Council will ensure that rents for re-let properties are set consistently and transparently having regard to:

- the formula rent for the property;
- the requirements of the Rent Standard;
- any rent caps or rent flexibility limits in force; and

- any exemptions or special provisions applying to the property type.

6.3 Affordable Rents are generally higher than Social Rents because they are based on local market rent levels rather than the Social Rent formula. When granting a tenancy of Affordable Rent housing to a new tenant, the initial rent (inclusive of any service charges) must not exceed 80% of the gross market rent for the property.

When can the Council charge an Affordable Rent?

6.4 Affordable Rent may only be charged in circumstances permitted by the Rent Standard and any associated funding agreements with the Secretary of State, Homes England or the Greater London Authority.

6.5 In practice, Affordable Rent is typically applied to new housing supply and is not generally available where a property has previously been let at a Social Rent.

Setting an Affordable Rent

6.6 Gross market rent means the rent, inclusive of any applicable service charges, which the accommodation could reasonably be expected to achieve if let in the private rented sector. In determining the gross market rent, account must be taken of the property's location, size, type and any services provided.

6.7 When setting Affordable Rent levels, the Council must comply with the requirements of the Rent Standard and the terms of any funding agreements entered into with Homes England, the Greater London Authority or the Secretary of State.

6.8 Affordable Rent properties are not subject to Local Housing Allowance limits. However, when setting rents, the Council may take account of local market conditions, affordability considerations and any applicable funding or regulatory requirements.

Property Valuations

6.9 Initial valuations used to determine Affordable Rent levels must be undertaken using a methodology recognised by the Royal Institution of Chartered Surveyors (RICS), ensuring a consistent and transparent approach to market rent assessment.

6.10 A full valuation is not required every time an Affordable Rent property is re-let. Where sufficient comparable market evidence exists, the Council may use a desktop review based on recent lettings and market transactions to determine the appropriate rent.

6.11 Housing for older people and vulnerable residents often includes additional services. Where Affordable Rent is being set for this type of accommodation, any market rent comparison should take account of similar accommodation providing comparable services.

Annual Rent Increases and Re-setting

6.12 Affordable Rent properties may not be increased by more than the maximum annual increase permitted under the Rent Standard. The permitted increase is based on the Consumer Prices Index (CPI) for the previous September plus one percentage point.

6.13 The Council may apply a lower increase than that permitted by the Rent Standard, or decide to freeze or reduce rents where considered appropriate.

6.14 When an Affordable Rent property is let to a new tenant, the rent may be re-set based on an updated market assessment, provided that it does not exceed 80% of the relevant gross market rent.

6.15 Rents must not be re-set where a tenancy is assigned through a mutual exchange, succession or other statutory assignment.

London Affordable Rent

6.16 London Affordable Rent (LAR) is a separate affordable housing tenure established by the Mayor of London and the Greater London Authority (GLA). It was introduced to support the delivery of genuinely affordable housing across London while also enabling local authorities and housing associations to bring forward new housing development.

6.17 Unlike Social Rent, London Affordable Rent is not determined through the Formula Rent methodology. Initial rent levels are determined in accordance with GLA funding requirements and the terms of the relevant grant agreement.

6.18 London Affordable Rents are generally higher than Social Rents but lower than Affordable Rents. The tenure is intended to balance affordability for tenants with the financial viability of delivering new affordable homes.

6.19 The delivery of significant numbers of new affordable homes within Brent has been made possible through the use of London Affordable Rent together with funding support provided by the Greater London Authority.

Discounted London Affordable Rent

6.20 In certain developments, the Council has adopted a policy of charging rents below the standard London Affordable Rent level. These homes are referred to as **Discounted London Affordable Rent** properties.

6.21 The Council's Discounted London Affordable Rent properties are principally located within the South Kilburn regeneration programme. Lower rents have been applied on a scheme-by-scheme basis, reflecting the fact that many tenants moving into these homes were existing Council tenants transferring from other social housing within the borough.

6.22 While these rents have generally been set at levels equivalent to the Social Rent Cap, the homes remain London Affordable Rent properties and are not governed by the Social Rent formula rent framework.

6.23 Where a Discounted London Affordable Rent property becomes vacant, the Council will normally re-let the property at the applicable London Affordable Rent level and remove the discount, unless an alternative decision is approved in accordance with the Council's policy framework.

Annual Rent Increases

6.24 Annual increases to London Affordable Rents will be applied in accordance with the Rent Standard and any applicable requirements of the Greater London Authority or associated funding agreements.

7. Rent Flexibilities

7.1 This policy statement on rents for social housing includes the provision for social landlords to apply a 5% flexibility on formula rents: 'The government's policy recognises that registered providers should have some discretion over the rent set for individual properties, to take account of local factors and concerns, in consultation with tenants.' Taking into account this provision of the Rent Standard, from 1st April 2027, subject to consultation, this policy allows for flexibility for registered providers to set rents at up to 5% above formula rent (10% for supported housing).

7.2 If applying this flexibility, providers should ensure that there is a clear rationale for doing so which takes into account local circumstances and affordability.'

7.3 The current financial climate - where our costs and additional burdens have increased faster than income mean we have significant challenges in meeting its obligations to its tenants. For example, by investing in our housing stock, ensuring all homes meet at least the decent homes standard, ensuring that homes meet the council's sustainability objectives and ensuring homes are warm and cheaper to heat for tenants while still setting a balanced HRA.

7.4 Rent flexibilities would not apply to any homes that are being delivered at London Affordable Rent and will not impact rents on existing tenancies which can only rise by CPI+1%.

7.5 Following consultation, rents on new builds at social rents and rents for re-lets of existing Council Homes would be set at formula rent plus 5% flexibility (subject to national rent cap).

8. Rent Increases and Convergence

8.1 We base our rent increases on the Rent Standard 2026 and policy guidelines, which ensures rent increases are in line with inflation, but still fair for tenants.

8.2 To do this, the Rent Standard uses the September Consumer Price Index (CPI²) produced by the Office for National Statistics plus an additional one per cent. The following table explains how much we can increase weekly rent within certain time periods, and any conditions we must follow according to the Rent Standard 2026.

Period	Weekly rent only to be increased	Unless	Then weekly rent may be increased
1 April 2026 – 31 March 2027	by up to CPI+1% (subject to rent cap) in any year	If a CPI +1% increase would exceed rent flexibility level for the year of increase	Only by up to CPI
1 April 2027 – 31 March 2028	by up to CPI+1% (subject to rent cap) in any year	If weekly rent after CPI+1% is below formula rent for the year of increase	to CPI+1% plus £1
		If weekly rent after CPI+1% is above formula rent for the year of increase	by CPI+1% plus the amount needed to reach formula rent
1 April 2028 – onwards	by up to CPI+1% for an existing social housing tenant	If weekly rent after CPI+1% increase would exceed the rent flexibility level for the year of increase	Only by up to CPI
		If weekly rent after CPI+1% increase is below formula	Only by up to CPI+1% plus £2

² Consumer Price Index is main method of measuring inflation by tracking the average change in prices over time for a representative “shopping basket” of consumer goods and services, such as food, clothing, energy and transportation.

		rent for the year of increase	
		However, if rent after CPI+1% plus £2 exceeds formula rent for the year of increase	By up to CPI+1% plus the amount needed to reach formula rent

8.3 From 2027/28 when CPI plus 1% is applied and rent remains below formula(target) rent, the rent standard allows housing providers to increase rents by an additional £1.00 per week as part of rent convergence proposals. This is increased to a maximum of an additional £2.00 per week from 2028/29 where rents remain below formula rent.

8.4 Rent convergence³ aims to boost HRA revenue for new, affordable housing construction and to maintain current homes. It can make rents fairer, by ensuring residents in similar social homes pay the same amount, while helping us manage costs.

9. Resident Engagement

9.1 The annual budget is published ahead of the Council's public meeting in February-March, it includes changes to rental charges and follows relevant legislation and budget setting framework (including the Rent Standard 2026).

9.2 Under Section 103, Housing Act 1985, the Council will vary rent annually by giving tenants at least 28 days' notice in writing. The annual changes in rent and service charges will be effective from the first Monday in April.

9.3 We will inform tenants of how we have spent your rent and service charges in the noticeboard and magazine sent out to all tenants every 6 months.

10. Monitoring and review

Review

10.1 This policy is reviewed a minimum of every 3 years (version number e.g version 1), unless otherwise required (version decimal point e.g version 1.3), and version control can be found in the footer of the document]

³ Rent convergence is the process of aligning social housing rents with a standard formula-based target, reintroduced from April 2026/2027 to raise rents on lower paying homes.

Monitoring process

10.2 Between formal reviews of the policy, the delivery will be monitored by a regular external rent compliance check every five years.

Training

10.3 Appropriate Brent Council housing staff, including the rent, rent accounting and lettings teams, will be trained on how to accurately set rent charges, including the calculation of formula rent and rent increases. In the case of changes in staffing, new starters in Brent will be trained in line with the same standards.

Roles and Responsibilities

10.4 Brent Council corporate finance, namely the HRA accountant, have a duty to monitor the account and ensure rent decisions are applied correctly and consistently. They will provide assurance that your rent charges and annual rent increases are set in accordance with this policy and relevant legislation such as the Rent Standard 2026.

Appendix A: Values for calculating formula rents

This appendix provides the values, apart from property-specific details, that is needed to calculate formula rents in Brent.

Since 2001 rents have been set in line with government policy using a social rent formula (often referred to as a target rent). The formula is based upon three distinct factors namely

- The relative RICS property values at January 1999 valuations, and
- Relative county income levels in 1999, and
- The size of the property

Rents

The national average rent that must be used, for April 2000, is £54.62.

Property Values

The national average property value to be used, for January 1999, is £49,750.

Earnings

The Greater London average manual earnings data to be used, for 1999, is £354.10

These figures are derived from the New Earning Survey (produced by the Office for National Statistics) and represent the average gross weekly earnings of full-time manual workers over the 1997 to 1999 period, uprated to 1999 prices.

Bedroom weights

The following bedroom weights must be used (specifically, applied to the earnings term in the formula):

Number of bedrooms (as set out in the tenancy agreement)	Bedroom weight
0 (i.e. bedsits)	0.8
1	0.9
2	1
3	1.1
4	1.2

Number of bedrooms (as set out in the tenancy agreement)	Bedroom weight
5	1.3
6 or more	1.4

The aim of this formula-based approach is to ensure that similar rents are charged for similar social rented properties within a region

The weekly social rent formula is equal to:

- 70% of the national average weekly rent (£54.62)
- Multiplied by relative county earnings (£354.10)
- Divided by national weekly manual earnings of £316.40
- Multiplied by a bedroom weighting

Plus

- 30% of the national average rent (£54.62)
- Multiplied by relative individual 1999 property value.
- Divided by national property average in England of £49,750

The combined base rent figure is then uplifted to 2026/27 rents by

- 215.36% for general needs stock with tenancy date pre 31 March 2021(capped)
- 223.61% for general needs stock with tenancy date post 1 April 2021 (uncapped)
- 227.91% for supported accommodation

Formula Rent example: three-bedroom property in Brent

The following example demonstrates how Formula Rent is calculated for a three-bedroom Social Rent property in the London Borough of Brent.

For the purposes of this example, the property's value at January 1999 is assumed to be **£55,000**. This is an illustrative figure used to demonstrate the calculation and does not represent the value of an average Brent property.

Using the Government's prescribed figures:

Calculation factor	Figure
National average rent at April 2000	£54.62
Greater London average manual earnings	£354.10
National average manual earnings	£316.40
Bedroom weight for a three-bedroom property	1.1
Illustrative property value at January 1999	£55,000
National average property value at January 1999	£49,750

Step 1: Earnings and property size element

70% of the national average rent is:

$$70\% \times £54.62 = £38.23$$

This is then adjusted for relative earnings in Greater London:

$$£38.23 \times (£354.10 \div £316.40) = £42.77$$

The bedroom weight for a three-bedroom property is then applied:

$$£42.77 \times 1.10 = £47.05$$

The earnings and property size element is therefore approximately **£47.05 per week**.

Step 2: Property value element

30% of the national average rent is:

$$30\% \times £54.62 = £16.39$$

This is then adjusted for the relative value of the property:

$$£16.39 \times (£55,000 \div £49,750) = £18.12$$

The property value element is therefore **£18.12 per week**.

Step 3: Calculate the Formula Rent

The two elements are added together:

$$£47.05 + £18.12 = £65.17 \text{ per week}$$

The Formula Rent for this illustrative three-bedroom Brent property would therefore be approximately **£65.17 per week for 2000-01**.

The Government's published example follows the same calculation methodology.

Updating Formula Rent

The Formula Rent calculated above is the property's **2000-01 Formula Rent**. The Government requires the 2000-01 Formula Rent to be updated using the prescribed annual adjustments to establish the Formula Rent for the relevant financial year.

From 2026-27 onwards, Formula Rents are generally adjusted annually by **CPI plus 1 percent**, based on CPI at September of the previous year.

The Council will use the Government's prescribed annual adjustment figures when calculating Formula Rents for new properties and when determining the applicable Formula Rent for existing properties.

	Cabinet 9 November 2026
	Report from the Corporate Director of Resident and Housing Services
	Lead Member – Cabinet Member for Housing, Homelessness & Renters (Councillor Robert Johnson)
Housing Management Policies	
Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
List of Appendices:	Thirteen ASB Policy Appendix 1 Draft Anti-Social Behaviour Policy Appendix 2: Anti-Social Behaviour Policy Equality Impact Assessment Compliance Policies Appendix 3: Draft Asbestos Policy Appendix 4: Draft Fire Policy Appendix 5: Draft Gas Safety Policy Appendix 6: Draft Water Safety Policy Appendix 7: Draft Mechanical Electrical Services Policy Appendix 8: Building Safety Guide for Residents Appendix 9: Compliance Policies Equality Impact Assessment Vulnerabilities and Reasonable Adjustments Policy Appendix 10: Draft Vulnerabilities and Reasonable Adjustments Policy Appendix 11: Vulnerabilities and Reasonable Adjustments Policy Equality Impact Assessment Compensation Policy Appendix 12: Draft Housing Compensation Policy Appendix 13: Housing Compensation Policy Equality Impact Assessment
Background Papers:	N/A
Contact Officer(s):	Spencer Randolph, Director of Housing Services

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1.0 Executive Summary

- 1.1. This report seeks Cabinet approval for a set of Housing Management Policies. The policies covered by this report are the Anti-Social Behaviour Policy, Compliance (Asbestos, Fire, Gas, Mechanical Electrical Services and Water) Policies, Vulnerabilities and Reasonable Adjustments Policy and Housing Compensation and Remedies Policy.
- 1.2 The development and review of these policies forms part of the Council's wider Housing Management Improvement Plan, which includes strengthening the policy framework that underpins housing management services and providing clearer expectations for staff and residents.
- 1.3 The policy programme supports the Council's ongoing work to ensure that its housing services comply with the requirements of the Regulator of Social Housing's Consumer Standards, including the requirements relating to "Safety and Quality", "Transparency, Influence and Accountability", and "Neighbourhood and Community".
- 1.4 This report provides an overview of the policies, their purpose and key changes made through consultation, and how they contribute to the Council's wider housing management improvement and regulatory compliance programme.
- 1.5 To support timely approval and implementation, and following legal advice, the policies have been brought together within a single report. This reflects the importance of having the policies in place as part of the Council's regulatory improvement work.

2.0 Recommendation(s)

- 2.1 Cabinet is asked to approve the following Housing Management Policies:
 - (a) Anti-Social Behaviour Policy.
 - (b) Compliance Policies (Asbestos, Fire, Gas Safety, Water Safety, Mechanical Electrical Services).
 - (c) Vulnerabilities and Reasonable Adjustments Policy; and
 - (d) Housing Compensation and Remedies Policy.
- 2.2 Cabinet are asked to comment on the status and next steps to deliver the policies' commitments.

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 The policies support the priorities set out in the Brent Borough Plan 2023–27, particularly the commitments to Prosperity and Stability in Brent and Thriving Communities.
- 3.1.2 The policies contribute to the Borough Plan's commitment to provide safe, secure and decent housing by strengthening the Council's approach to building safety, housing management and the quality of services provided to residents.
- 3.1.3 They also support the ambition for thriving and safer communities by strengthening the Council's approach to tackling anti-social behaviour, supporting vulnerable residents and ensuring residents have clear and consistent routes to remedies when things go wrong.
- 3.1.4 The policies also support the Council's wider commitment to accessible services and ensuring that residents have opportunities to influence the development and review of housing management services.

3.2 Background

- 3.2.1 The Council is committed to providing safe, secure and well-managed homes and delivering high-quality housing services for residents
- 3.2.2 The Council is undertaking a wider programme of housing management improvement to strengthen our compliance with the Regulator of Social Housing's Consumer Standards and improve the quality, consistency and accountability of housing services.
- 3.2.3 A key element of this work is the development and review of the Council's housing management policies. This includes ensuring that policies are current, clearly set out the Council's approach and responsibilities, and provide an appropriate framework for staff and residents.
- 3.2.4 The policy programme is particularly important in the context of the Regulator of Social Housing's Consumer Standards. The standards set expectations for registered providers in relation to the quality and safety of homes, transparency and accountability, neighbourhood and community management, and the provision of fair and accessible services.
- 3.2.5 The Council has therefore been reviewing its housing management policies to identify gaps, strengthen existing arrangements and ensure that policies provide an appropriate framework for staff and residents.
- 3.2.6 The policies covered by this report have been developed or reviewed as part of this programme and are now being presented for approval.

4.0 Policies for Approval

4.1 Anti-Social Behaviour (ASB) Policy

- 4.1.1 As a social landlord, Brent Housing Management has clear responsibilities to prevent and tackle anti-social behaviour (ASB) and to consider the impact of ASB on residents and communities.
- 4.1.2 Under the Regulator of Social Housing's "Neighbourhood and Community Standard", registered providers are required to have effective policies and processes to prevent and tackle ASB. The revised ASB Policy provides a clear framework for how Brent Housing Management will meet this requirement and respond effectively to reports of ASB.
- 4.1.3 The policy sets out the Council's approach to receiving, assessing and managing reports of ASB, including risk-based case management, prevention and early intervention, partnership working and proportionate enforcement.
- 4.1.4 The policy establishes clear expectations for how ASB cases should be managed, including communication with residents, recording and monitoring of cases, and the use of proportionate interventions and enforcement. This provides a consistent standard for residents and staff and enables the Council to be held accountable for how ASB is managed.
- 4.1.5 The policy places an emphasis on prevention, early intervention and achieving sustainable outcomes for residents and their communities.
- 4.1.6 Consultation and Resident Engagement
- 4.1.7 A six-week public consultation was undertaken through the Council's Have Your Say portal between 4 June 2026 and 19 July 2026. Residents were invited to comment on the proposed Anti-Social Behaviour Policy.
- 4.1.8 To supplement this engagement, the draft policy was also presented at a workshop with Brent Youth Parliament, providing detailed feedback from eight young residents with experience of ASB in Brent.
- 4.1.9 Feedback received from 28 residents during the consultation informed several amendments to the policy, including:

Enhanced focus on prevention:

- Added in a greater emphasis on early intervention, risk assessment, resident engagement and support pathways.

Improved communication, accountability and enforcement:

- Clearer expectations around resident updates, information sharing, record keeping and proportionate enforcement.

Strengthened focus on partnership workings:

- Added in a greater emphasis on joint working with internal services, statutory agencies and community organisations.

Enhanced monitoring and reporting of outcomes:

- Stronger focus on performance, case outcomes, trend analysis and management oversight.

4.1.10 Following approval, the policy will be communicated to staff and residents, with appropriate guidance and training provided to support implementation. Performance and outcomes will be monitored through existing housing management governance arrangements.

4.2 Compliance Policies

4.2.1 The Council has developed five compliance policies covering asbestos, fire, gas, water and mechanical and electrical services. Collectively, the policies establish the Council's framework for managing health and safety risks across its housing stock. They set out the responsibilities and assurance arrangements that support the safe management of residents' homes.

4.2.2 The policies also form part of the Council's wider Building Safety Strategy. They support the Council in meeting its statutory and regulatory responsibilities, including those arising from the Building Safety Act 2022 and associated regulations, the requirements of the Building Safety Regulator, and the Regulator of Social Housing's "Safety and Quality Standard".

4.2.3 The policies provide a consistent approach to identifying, assessing and managing compliance risks and set out the arrangements for inspection, maintenance, record keeping, monitoring and escalation where risks or areas of non-compliance are identified. They also clarify responsibilities across the services involved in managing building and property safety.

4.2.4 Each policy covers a specific area of compliance:

- **Fire Safety Policy** – sets out how fire safety risks are identified and managed within the Council's housing stock and how the Council will meet its statutory fire safety responsibilities.
- **Gas Safety Policy** – sets out the arrangements for the safe inspection, servicing, maintenance and management of gas installations.
- **Water Safety Policy** – sets out the approach to managing water safety and quality risks, including the management of Legionella and communal water systems.
- **Asbestos Policy** – sets out how asbestos-containing materials are identified, assessed, recorded and managed to minimise risks to residents, staff and contractors.

- **Mechanical and Electrical Services Policy** – sets out the arrangements for the safe inspection, maintenance and management of mechanical and electrical systems within the housing stock.

4.2.5 Consultation and Resident Engagement

- 4.2.6 A public consultation was undertaken through the Council's Have Your Say portal between 21 April 2026 and 31 May 2026. Residents were invited to comment on the proposed policies.
- 4.2.7 Residents highlighted that the policies contained technical terminology which made some aspects difficult to understand. In response, a *Building Safety Guide for Residents* has been drafted to sit alongside the policies and explain the Council's approach to building safety in accessible, non-technical language.

4.3 **Vulnerabilities and Reasonable Adjustments Policy**

- 4.3.1 This policy sets out the Council's approach to ensuring that residents experiencing vulnerabilities receive fair, equitable and accessible housing services.
- 4.3.2 The Council has a duty under the Equality Act 2010 to "advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it" (see Section 8 on Protected Characteristics). However, as a social landlord, the Council recognises that residents may experience vulnerabilities for reasons beyond those protected under equalities legislation. The policy therefore sets out how vulnerability is identified and how the Council will respond to residents' individual needs.
- 4.3.3 The policy sets out the Council's approach to addressing vulnerabilities across housing services and the reasonable adjustments that will be put in place for residents who require them.
- 4.3.4 It also provides signposting to wider support services where additional support is required, including GPs and other medical professionals, Mental Health Services, Adult Social Care Services, Family Wellbeing Centres and Brent Hubs. These services complement, but do not replace, tailored adjustments within housing services.
- #### 4.3.5 Consultation and Resident Engagement
- 4.3.6 A six-week public consultation was undertaken through the Council's Have Your Say portal between 17 July 2026 and 28 August 2026. Residents were invited to comment on the proposed policy.
- 4.3.7 Feedback was received from 9 residents. Respondents highlighted the importance of ensuring that the policy is implemented effectively and that staff have the knowledge and support needed to respond appropriately to residents experiencing vulnerabilities and requiring reasonable adjustments.

- 4.3.8 Respondents also suggested that the policy could be strengthened by including specific wording on reasonable adjustments from the Equality Act 2010.
- 4.3.9 In response to this feedback, the policy has been amended to include the relevant wording from the Equality Act 2010, with a footnote providing the relevant reference.
- 4.3.10 Following approval, staff support will be provided to help embed vulnerability-aware practice across housing-related policies, procedures and reviews.

4.4 Housing Compensation and Remedies Policy

- 4.4.1 This policy sets out the Council's approach to compensation and other remedies where residents have experienced a service failure, loss or inconvenience. It aims to ensure compensation is fair and consistent, while taking account of individual circumstances and the impact on residents.
- 4.4.2 The policy sets out the different types of compensation and remedies available, and the circumstances in which they may be considered. This includes compensation relating to missed repairs appointments, complaints, resident engagement and home loss or decant.
- 4.4.3 Consultation and Resident Engagement
- 4.4.4 A six-week public consultation was undertaken through the Council's Have Your Say portal between 24 August 2026 and 4 October 2026. Residents were invited to comment on the proposed policy.
- 4.4.5 Feedback was received from four residents. Respondents raised concerns about the clarity of the definition of remedies, particularly the use of the phrase "something has gone wrong", and the need for the policy to more clearly recognise the stress and impact caused by service failures.
- 4.4.6 In response to this feedback, the definition of remedies has been amended to replace the phrase "something has gone wrong" with more specific examples of service failure, including delays, missed appointments, failures to complete repairs and poor complaint handling. The guiding principles have also been strengthened to explicitly recognise the distress and disruption that service failures can have on residents.
- 4.4.7 Following approval, the policy will be communicated to relevant staff and embedded through existing complaints, compensation and service recovery processes. Monitoring and quality assurance arrangements will support the application of the policy.

5.0 Financial Considerations

- 5.1 The proposed policies focus on prevention and early intervention to address issues. This approach will reduce the need for more costly reactive interventions to deal with problems after they have occurred. The monitoring

processes proposed will help teams identify areas where additional resources may be required which will aid budget planning. The financial implications of introducing the policies will be considered in the development of the Council's 2027/28 budget and for future years in the update of the Council's Medium-Term Financial Strategy.

6.0 Legal Considerations

- 6.1 The Social Housing Regulation Act (2023) introduced new consumer standards and increased the powers of the Regulator of Social Housing. The consumer standards which apply to social housing providers require that providers meet all applicable statutory requirements for the health and safety of occupants in their homes.
- 6.2 Under Section 149 of the Equality Act 2010, the Council must demonstrate "due regard" to the need to eliminate discrimination and advance equality of its residents. Each of the policy should also include Equality Impact Assessment (EIA) to evidence that the policy does not unfairly disadvantage residents falling within the protected characteristic groups.
- 6.3 As the Council owes a duty of financial care to its residents, it is imperative that each of the policy must represent a proportionate, lawful use of public funds and assets.
- 6.4 Housing policies often interfere with private lives or require handling sensitive data. It is therefore important to ensure that each policy must confirm compliance with relevant Human Right Acts 1998 particularly Article 8 which is right to respect for private and family life as well as the Data Protection Act 2018 / UK GDPR.
- 6.5 As the proposed policies are intended to comply with statutory requirements and improve the Council's performance against the applicable standards and to reassure the RSH that the Council is taking the necessary steps to meet its statutory obligations. Having these policies and procedures in place will strengthen Council's position and minimises the chance of legal challenges.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 For each of the policies an Equality Impact Assessment (EIA) has been completed to assess the potential impact of the policy on residents with protected characteristics and other potentially disadvantaged groups.
- 7.2 The EIAs have informed the development and review of the policies, with appropriate measures identified where required to mitigate potential negative impacts and promote equitable access to housing services.

8.0 Climate Change and Environmental Considerations

- 8.1 The policies support the Council's wider commitments under the Brent Climate and Ecological Emergency Strategy 2021-2030, particularly the strategy's objectives relating to homes and the built environment.
- 8.2 The policies are not expected to have any significant direct impact on climate change or the environment. However, the Compliance Policies provide a framework for the safe and effective management and maintenance of the Council's housing stock and will be implemented alongside the Council's wider environmental and sustainability requirements.

9.0 Communication Considerations

- 9.1 Following approval, all policies will be published on the Brent Council website and made available to residents in accessible formats.
- 9.2 The policies will be communicated to staff through guidance and training. Supporting operational procedures will also be updated to ensure consistent implementation across Housing Services.
- 9.3 Residents will be provided with clear information about the policies and any changes that affect the services they receive. Communication will take account of residents' accessibility needs and the requirements set out in the Vulnerabilities and Reasonable Adjustments Policy.
- 9.4 Resident feedback and engagement will continue to inform the implementation and future review of the policies, with learning and feedback considered through the Council's existing housing management governance arrangements.

Report sign off:

Thomas Cattermole

Corporate Director Housing & Resident Services

Legal considerations provided by:
Stephen Akpan, Senior Lawyer Civil Litigation &
Homelessness

Finance considerations provided by:
Martin Hone, Head of Finance

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ASB Policy Appendices

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London Borough of Brent

Housing Anti-Social Behaviour Policy

The Policy sets out our how Brent Council's housing services will respond to anti-social behaviour (ASB). Brent Council is committed to preventing and tackling anti-social behaviour (ASB) to ensure residents can enjoy safe, secure, and peaceful communities.

Owner:	Spencer Randolph, Director of Housing Services	
Approved by:	DMT/Board/Cabinet	Insert date in format dd/mm/yyyy
Review cycle: (years)	Annually	
Next review date:	01/11/2027 (Subject to approval date)	



Regulatory Standards, Legislation and Codes of Practice

Regulator:	Regulator of Social Housing – Neighbourhood and Community Standard
Legislation:	<ul style="list-style-type: none"> • Housing Act 1985 • Housing Act 1988 • Housing Act 1996 • Antisocial Behaviour, Crime and Policing Act 2014 • Equality Act 2010 • Health and Safety at Work etc. Act 1974 • Children Act 1989, Children Act 2004, and Care Act 2014 • Human Rights Act 1998 • Clean Neighbourhoods Act 2005 • Environmental Protection Act 1990 • Data Protection Act 2018 and UK GDPR • Crime and Disorder Act 1998 • Domestic Abuse Act 2021 • Police, Crime, Sentencing and Courts Act 2022
Codes of Practice:	<ul style="list-style-type: none"> • Statutory Guidance for Frontline Professionals on Anti-Social Behaviour, Crime and Policing Act 2014 • Housing Ombudsman Complaint Handling Code • Housing Ombudsman Spotlight Report on Noise Complaints • Housing Ombudsman Spotlight Report on Knowledge and Information Management • Housing Ombudsman Spotlight Report on Anti-Social Behaviour • National Housing Federation ASB Guidance • CIH (Chartered Institute of Housing) Professional Standards and Practice Guidance • Ministry of Housing, Communities and Local Government Guidance on Tackling Anti-Social Behaviour • Community Trigger (ASB Case Review) Statutory Guidance

	<ul style="list-style-type: none"> • Information Commissioner's Office (ICO) Data Sharing Code of Practice • Domestic Abuse Statutory Guidance (Home Office) • Victims' Code (Code of Practice for Victims of Crime)
The policy also operates in the context of:	<ul style="list-style-type: none"> • Hate Crime Policy (Consultation Stage- Aug 2026) Hate Crime Policy Housing Management Service - Consultation Draft 2026 • Domestic Abuse Policy (Awaiting approval – Aug 2026) 3.0 Brent Housing Domestic Abuse Policy.docx • Brent's Community Safety Strategy - Community Safety Strategy

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1. Introduction & Policy Statement

This policy outlines Brent Council's approach to preventing, managing, and responding to anti-social behaviour (ASB) within its Housing Management services. It aims to ensure that all Brent Council tenants and leaseholders feel safe, respected, and supported in their communities, and that ASB is addressed swiftly, fairly, and proportionately.

This policy ensures that Brent Council, as a landlord, freeholder, and employer, meets its legal duties as the:

Housing authority under the Housing Act 1985, Housing Act 1988, and Housing Act 1996 to manage its properties effectively, take reasonable steps to prevent nuisance and annoyance, and protect the quiet enjoyment of residents. We will enforce this through the terms and conditions of the Tenancy Agreements.

- **Relevant authority** under the *Antisocial Behaviour, Crime and Policing Act 2014* using appropriate tools and powers such as Civil Injunctions, Community Protection Notices, Closure Powers, and the Community Trigger to prevent and address ASB *social Behaviour*.
- **Public sector body** under the *Equality Act 2010* to eliminate discrimination, advance equality of opportunity, and foster good relations, including taking robust action against hate crime and harassment related to protected characteristics.
- **Employer and service provider** under the *Health and Safety at Work etc. Act 1974* and related regulations to protect staff from violence, abuse, and harassment in the course of their duties.
- **Safeguarding partner** with duties under the *Children Act 1989*, *Children Act 2004*, and *Care Act 2014* to protect children and adults at risk from harm, neglect, exploitation, or abuse linked to ASB.
- **Public authority** under the *Human Rights Act 1998* to act proportionately and lawfully in a way that respects individuals' rights, including the right to respect for private and family life and the right to a fair hearing.
- **Enforcement body** under the Clean Neighbourhoods and Environment Act 2005, enabling action against environmental antisocial behaviour such as littering, graffiti, fly-posting, abandoned vehicles, noise, and nuisance caused by animals.
- **Statutory authority** under the Environmental Protection Act 1990 with duties to prevent, investigate, and take enforcement action against statutory nuisances, including noise, smoke, odour, accumulation of waste, and other environmental conditions that adversely affect residents' health or quality of life.

This policy applies to:

- Brent Council tenants, leaseholders, license-holders and residents living in council-managed properties.
- ASB incidents occurring in or around council-owned homes or communal areas, or within council-owned estates.

Brief Background

Anti-social behaviour (ASB) can have a serious and lasting impact on individuals, families, and communities. Brent Council's Housing Management Service recognises that tackling ASB is essential to maintaining safe and inclusive neighbourhoods.

Commitments

Brent Council commits to:

- **Prioritise victims**, recognising their potential vulnerability.
- **Ensure transparency and accountability** in how ASB is managed.
- **Use evidence-based practices** to prevent and resolve ASB.
- **Empower communities** to report concerns and participate in solutions.
- **Continuously improve services** through monitoring, feedback, and training.

To deliver these commitments, Brent Council will:

- Prevent ASB through early intervention, education, and community engagement.
- Respond effectively to ASB reports using a risk-based and victim-centred approach.
- Support victims and vulnerable individuals, ensuring their safety and wellbeing.
- Hold perpetrators accountable while promoting tenancy sustainment where appropriate.
- Work collaboratively with residents, internal teams, and external agencies to resolve ASB and build safer communities.
- Provide clear and accessible information on how to report ASB, how cases will be managed, and how residents can escalate concerns or make a complaint if they are dissatisfied with the response.
- Review to ensure an inclusive service

2. What is Anti-Social Behaviour (ASB)?

Definition of ASB

Anti-social behaviour (ASB) is defined in the Anti-social Behaviour, Crime and Policing Act 2014 as:

“Conduct that has caused, or is likely to cause, harassment, alarm or distress to any person.”

- conduct capable of causing nuisance or annoyance to a person in relation to that person's occupation of residential premises; or conduct capable of causing housing-related nuisance or annoyance to any person.

What Brent Council Considers to be ASB

Brent Council recognises a wide range of behaviours that may be considered anti-social, including (but not limited to):

- Noise nuisance
- Verbal abuse or threats
- Harassment or intimidation including sexual or gender-based harassment, including behaviours linked to Violence Against Women and Girls (VAWG)
- Hate-related incidents
- Drug use or drug dealing in communal areas
- Vandalism or property damage
- Aggressive or threatening behaviour
- Misuse of communal areas
- Loitering
- Fly-tipping
- Domestic abuse
- Vehicle-related nuisance

3. Behaviour not classified as anti-social behaviour (ASB)

Definition of Nuisance Behaviour

Nuisance behaviour refers to everyday living noises or actions that may be annoying or inconvenient to others but are not anti-social behaviour (ASB). These behaviours are often unintentional, non-malicious, and not persistent or targeted. They are typically:

- Do not cause harassment, alarm, or distress.
- Are part of normal household or lifestyle activities.
- May be the result of poor sound insulation.

Examples of Nuisance Behaviour

These are behaviours that may upset or disturb others but are unlikely to be treated as ASB unless they are persistent, targeted, or escalate:

1. Cooking smells
- Ordinary domestic noise (e.g babies crying, hoovers, washing machines, heavy walking)
 - DIY during reasonable hours
 - One-off parties or arguments
 - Slamming doors or flushing toilets
 - People leaving for work at odd hours (e.g. shift workers)
 - Noise due to poor sound insulation

Nuisance should be addressed through informal neighbour conversations, mediation, or guidance on being a good neighbour.

4. Domestic Abuse & ASB

Anti-social behaviour (ASB) can sometimes be linked to domestic abuse. Domestic abuse includes controlling, coercive, threatening or violent behaviour between people aged 16 or over who are, or have been, partners or family members. This can take many forms, such as emotional, physical, sexual, financial abuse, or coercive control.

Domestic abuse **must not** be treated as a standard ASB complaint. It requires a **trauma-informed, victim centred response**, often involving safeguarding teams and other specialist agencies.

Residents experiencing domestic abuse can report it to the police in an emergency, Brent's housing or community safety teams, or specialist support services. Brent Council provides access to emergency housing, safety planning, advocacy, legal advice and emotional support.

Because domestic abuse requires a coordinated, multiagency response, full details on how the council manages these cases are set out in our **Domestic Abuse Policy**, which you can find here: **[insert link]**.

If you require further support, you could also refer to local domestic abuse services:

Service	Support Provided	Contact Details
Refuge (National Domestic Abuse Helpline)	National 24/7 domestic abuse support for women and children	24/7 Helpline: 0808 2000 247 (Free & confidential) Website: refuge.org.uk General Enquiries: 020 7395 7700 (Mon–Fri, 9am–5:30pm) Supporter Care: 020 7395 7771 Email: supportercare@refuge.org.uk
Women's Aid	Online support for women experiencing domestic abuse	Live Chat: chat.womensaid.org.uk Email Support: helpline@womensaid.org.uk Website: womensaid.org.uk Note: Women's Aid does not operate a public helpline but works closely with Refuge's national helpline.
Victim Support	Emotional and practical support for victims of crime, available 24/7	Support Line: 08 08 16 89 111 (24/7) Website: victimsupport.org.uk London Office: 50–52 Hampstead Rd, London NW1 Telephone: 020 7388 8198

5. Our Service Standards

Our service standards outline what residents can expect from us, to help keep communities safe and respectful.

Taking Reports Seriously

We will:

- Prioritise urgent risk cases such as violence, hate crime, and domestic abuse.
- Provide multiple reporting channels, allowing residents to report ASB online, by phone, in person, or anonymously.

- We apply a risk-based response, using our ASB risk matrix to assess seriousness and vulnerability, with tiered response times determined by the assessed level of risk.

Treating You with Respect

We will:

- Handle your personal information confidentially and sensitively in accordance with data protection legislation.
- Treat all residents fairly, with dignity, and without discrimination.

Clear Communication

We will:

- Explain the ASB process, what will happen next, and expected timeframes.
- A **named officer** will be assigned to manage each case from start to finish.
- Provide regular updates during ongoing or complex cases.
- **Share** an **action plan** with the complainant, outlining next steps and expected timescales when relevant.
- Ensure residents understand **how to escalate concerns or make a complaint** if they are unhappy with their case handling.

Support When Needed

We will:

- Offer appropriate support or referrals to specialist services.
- Use **early intervention tools** such as mediation, verbal warnings, neighbourhood cards and Acceptable Behaviour Contracts (ABCs) to prevent escalation.

Fair and Proportionate Action

We will:

- Base decisions on evidence, risk, and the seriousness of the behaviour.
- Share outcomes with residents where lawful and appropriate.
- Take **enforcement action when necessary**, including injunctions, closure orders, or tenancy enforcement.
- **Close cases only when appropriate**, and seek to do so with complainant agreement where possible.
- Use **feedback and learning** from residents to continuously improve our service.

6. Meeting the needs of our diverse communities

Identifying Vulnerable Residents

We define vulnerable residents as individuals who may be at greater risk of harm or distress due to personal circumstances, including but not limited to:

- Age (e.g. elderly or very young residents)
- Disability or long-term health conditions
- Mental health needs
- Learning difficulties or neurodivergence
- Domestic abuse or safeguarding concerns
- Language barriers or social isolation
- Substance misuse or recovery
- Previous victimisation or trauma
-

Area Tenancy Managers are trained to identify signs of vulnerability during initial contact and throughout the case lifecycle. We also work with partner agencies to gather relevant information and ensure a joined up approach.

Support Services for Victims

We take a proactive and compassionate approach to supporting victims:

- We assess support needs from the outset
- 1. When a resident reports ASB, our officers carry out an initial impact and vulnerability assessment to understand how the behaviour is affecting them and whether additional support is needed.
- We tailor support to individual circumstances

Where appropriate, we create a Personalised support plan.

This may include:

- Referrals to domestic abuse services, mental health support, or victim advocacy organisations
- Emotional reassurance and regular check-ins
- We work in partnership to provide wraparound care
- For high-risk or complex cases, we coordinate with the Community Safety Team, police, social care, and health services to ensure a joined-up response.

- We ensure accessibility and inclusion
- Our support is inclusive of all residents, including those with disabilities, language needs, or other vulnerabilities. We provide interpreters and accessible formats where needed.

Violence Against Women and Girls (VAWG)

Brent Council is committed to ensuring that resident safety is at the heart of its response to anti-social behaviour (ASB). The Council recognises that ASB, harassment, intimidation, stalking, public nuisance, and other community safety concerns can have a disproportionate impact on women and girls, as well as young people and other vulnerable residents. Such behaviours can affect individuals' ability to feel safe in their homes, neighbourhoods, and local communities, impacting their physical and emotional wellbeing and quality of life.

The Council acknowledges that experiences of ASB may be linked to wider forms of violence against women and girls (VAWG), including harassment, coercive and controlling behaviour, domestic abuse, stalking, sexual harassment, and other forms of gender-based abuse. Reports involving these issues will be taken seriously and assessed with appropriate regard to the risks, vulnerabilities, and safeguarding needs of those affected. Risk assessments will take account of factors such as gender, age, disability, previous victimisation, fear of repeat incidents, and any identified safeguarding concerns to ensure that support and interventions are tailored appropriately.

7. Making it easy to report ASB

Reporting Mechanisms

We are committed to making it as simple and accessible as possible for residents to report anti-social behaviour (ASB). Our approach ensures that all residents regardless of background or circumstance can report concerns safely and confidently.

Residents can report ASB using any of the following accessible and inclusive methods:

Reporting Method	Details	Additional Information
------------------	---------	------------------------

Online Reporting (24/7)	Residents can submit reports at any time using the secure online form: www.brent.gov.uk/asb	<ul style="list-style-type: none"> • Mobile-friendly • Suitable for uploading evidence such as photos and videos
Telephone Support	Residents can call the ASB reporting line during office hours: 0208 937 2400 (Mon–Fri, 9am–5pm)	<ul style="list-style-type: none"> • Staff will take details with sensitivity and confidentiality • Interpreting services available for residents who speak English as an additional language • Urgent issues outside office hours can be reported via the same number
In-Person Reporting	Residents can visit the Civic Centre to speak to the officer on duty face-to-face.	<ul style="list-style-type: none"> • Staff are trained to respond with care, confidentiality, and cultural sensitivity
Email Reporting	Residents can submit reports at any time by emailing: asb@brent.gov.uk	
Anonymous Reporting	Residents may report ASB anonymously through all standard channels (online form, phone, email, or partner agencies).	<ul style="list-style-type: none"> • Cases will be investigated where possible • Limited information may restrict the actions that can be taken

ASB Customer Journey

ASB CUSTOMER JOURNEY

SUPPORTING RESIDENTS • TACKLING ANTI-SOCIAL BEHAVIOUR • BUILDING SAFER COMMUNITIES



8. Prevention of ASB

Brent Housing Management recognises that preventing ASB is just as important as responding to it. We take a proactive, community-based approach to reduce risk, encourage early resolution, and promote positive neighbourhood relationships.

Good Neighbour Policy

Brent Council is committed to creating a **Good Neighbour Policy** to promote respectful, positive, and considerate behaviour within our communities. This policy will be developed and shared with tenants and leaseholders once completed and will be reinforced through tenancy agreements, welcome information for new residents, and estate communications.

The planned policy will set out clear expectations, including:

- Respecting neighbours' right to peace and quiet
- Keeping shared spaces clean, safe, and accessible
- Being mindful of noise, pets, and visitors
- Resolving minor or low level disputes informally where possible

Dear Neighbour Card

Residents are encouraged to use polite, Dear Neighbour cards to raise concerns directly with neighbours such as noise or rubbish before issues escalate. This tool empowers residents to communicate respectfully and helps prevent minor issues from becoming formal complaints.

Early Intervention

We use a range of early intervention tools to stop ASB from escalating, including:

- Warning letters
- Acceptable Behaviour Contracts (ABCs)
- Parenting contracts (where children are involved)
- Formal mediation is a voluntary, structured process where a mediator helps neighbours resolve low-level, ongoing conflict by supporting safe conversation and agreement of practical solutions.

These approaches help resolve concerns early without needing formal enforcement.

Estate Management

Area Tenancy Managers and Housing Officers conduct estate inspections to identify potential ASB hotspots and engage with residents. We also use environmental design measures such as improved lighting, CCTV, and secure entry systems to deter nuisance behaviour.

Conflict Resolution

Brent Council is committed to resolving neighbour disputes early to prevent escalation and reduce stress for residents. We use a range of conflict resolution approaches depending on the nature of the issue and the willingness of both parties to engage.

9. Responding to cases within the agreed timeframe

Brent Housing Management is committed to responding to anti-social behaviour (ASB) reports promptly and proportionately. We follow a structured, risk-based approach to ensure that all cases are handled fairly, consistently, and in line with our responsibilities as a landlord.

High Risk - Threats of violence, hate crime, serious harassment, safeguarding concerns

Medium Risk - Ongoing neighbour disputes, verbal abuse, repeated noise nuisance

Low risk - Minor tenancy breaches, untidy gardens, pet nuisance

The below timeframes are triggered when a case has been assigned or your case worker has been made aware of the anti-social behaviour (ASB) report.

HOW BRENT COUNCIL HOUSING SERVICE RESPONDS TO ANTI-SOCIAL BEHAVIOUR (ASB) REPORTS

We take ASB seriously and respond proportionately based on the risk level.
Our priority is to keep residents safe and improve communities.



WHAT WE DO	! HIGH RISK	! MEDIUM RISK	✓ LOW RISK
 1. Make initial contact with the complainant We acknowledge your report and let you know what happens next.	 48 HOURS	 48 HOURS	 3 WORKING DAYS
 2. Interview complainant and agree an initial action plan We discuss the issue in detail and agree an initial plan of action with you.	 5 WORKING DAYS	 10 WORKING DAYS	 10 WORKING DAYS
 3. Complete vulnerability assessment We assess any vulnerabilities to ensure the right support is in place.	 5 WORKING DAYS	 7 WORKING DAYS	 10 WORKING DAYS
 4. Contact the alleged perpetrator (where safe and appropriate) <i>Note: In domestic abuse cases, this may not be safe.</i>	 5 WORKING DAYS	 5 WORKING DAYS	 5 WORKING DAYS



RISK-BASED RESPONSE

Response times vary depending on the severity and risk of the report. This ensures we act quickly when it matters most.



OUR COMMITMENT

We are committed to taking effective action, working with partners and supporting residents to create safe, respectful and thriving communities.



IN AN EMERGENCY OR IF YOU FEEL UNSAFE

Always call **999**.

For non-emergencies, report ASB to us online, by phone or in person.



Report online:

brent.gov.uk/ASB

10. Roles & Responsibilities

Area Tenancy Managers

Responsibility Area	What the Area Tenancy Manager Does
1. Listening and Recording Your Report	<ul style="list-style-type: none"> • Listen to your concerns and record all details you provide. • Ask when the ASB occurs, how often, and how it affects you. • Explain how to keep ongoing records (diary logs, photos, Brent Noise App).
2. Gathering Information	<ul style="list-style-type: none"> • Ask for evidence such as photos, videos, or witness information. • Speak with neighbours/residents when safe and appropriate. • Liaise with Police, Community Protection Team, and external partners. • Review previous reports linked to the property.
3. Checking Risk and Vulnerability	<ul style="list-style-type: none"> • Complete a risk assessment to identify any risk of harm. • Prioritise serious cases (threats, harassment, hate behaviour, domestic abuse). • Discuss support options if you need extra help or protection. • Signpost to external agencies offering victim support.
4. Assessing Tenancy Responsibilities	<ul style="list-style-type: none"> • Check whether the behaviour breaches tenancy or lease conditions. • Explain the tenancy rules that apply to your situation. • Advise on next steps if a breach is likely. • Explain that low-level ASB is managed via tenancy terms and conditions.
5. Early Intervention	<ul style="list-style-type: none"> • Issue verbal or written warnings. • Contact the alleged perpetrator. • Arrange mediation (where appropriate). • Set up Good Neighbour Agreements. • Use Acceptable Behaviour Contracts (ABCs).

6. Escalating the Case When Needed	<ul style="list-style-type: none"> • Begin formal tenancy enforcement (injunctions, closure orders, possession action). • Request joint visits with enforcement partners such as the Police. • Recommend further action where tenancy breaches continue.
7. Communication	<ul style="list-style-type: none"> • Keep you updated about your case. • Agree how often you will receive updates. • Inform you when actions have been taken.
8. Case Closure	<ul style="list-style-type: none"> • Close the case when issues are resolved/improved or when no further evidence exists. • Provide a written outcome letter explaining why the case is being closed.

ASB Officers (Community Protection Team – CPT)

Responsibility Area	What ASB Officers Do
1. Working with the Police and Other Agencies	<ul style="list-style-type: none"> • Work directly with the Police on joint visits, evidence gathering, and action planning. • Share information lawfully to protect victims and tackle persistent offenders. • Plan joint enforcement where needed (drug activity, threats, community-wide nuisance). • Write to the resident with an outcome letter when the case is closed.
2. Multi-Agency Meetings	<p>BJAG (Brent Joint Action Group):</p> <ul style="list-style-type: none"> • Partnership meeting involving the council, police, health, fire services and others. • Reviews recurring ASB locations and coordinates action. <p>Community MARAC:</p> <ul style="list-style-type: none"> • Used for high-risk or vulnerable victims. • Agencies share information and agree safeguarding/safety plans. • Protects residents experiencing threats, harassment, domestic abuse or serious harm. <p>Other Multi-Agency Case Conferences:</p> <ul style="list-style-type: none"> • May include Housing, Social Care, Mental Health

	Services, Youth Offending or Education depending on the issues.
3. Escalating Action When Behaviour Does Not Improve	<ul style="list-style-type: none"> • Move from warnings to legal notices. • Work with the Police to gather evidence for enforcement. • Recommend tenancy enforcement if the perpetrator is a council tenant. • Present the case at BJAG or MARAC for joint decisions. • Seek court orders when necessary and proportionate. • Keep residents updated at every stage.
4. Using Legal Powers When Needed	<p>The Community Protection Team may use formal enforcement tools when ASB continues or is serious, including:</p> <ul style="list-style-type: none"> • Acceptable Behaviour Agreement (Contract) • Community Protection Warning (CPW) • Community Protection Notice (CPN) • Criminal Behaviour Order (CBO) • Closure Notice or Closure Order <p>These tools aim to stop persistent ASB, protect victims, and improve safety.</p>

Police

Responsibility Area	What the Police Do
Criminal Investigation	<ul style="list-style-type: none"> • Investigate any criminal behaviour linked to ASB.
Criminal Enforcement	<ul style="list-style-type: none"> • Take action under criminal law when necessary.
Joint Working with CPT	<ul style="list-style-type: none"> • Work with the Community Protection Team (CPT) on joint patrols, evidence gathering, and coordinated enforcement.

11. Working together with residents, partner services and agencies

Resident and Community Involvement

Brent Council believes that residents and community partners play a vital role in preventing and addressing antisocial behaviour (ASB). We work together to create safer, more connected neighbourhoods through:

Resident Participation

- **Resident Panels and Forums:** Regular meetings where residents can raise concerns, share ideas, and help shape local ASB responses.
- **Neighbourhood Walkabouts:** Reassure residents through visible presence.
- **Feedback and Codesign:** Residents help design policies, communications, and prevention campaigns, ensuring services reflect lived experience.
- **Empowerment Tools:** Promotion of resources such as the *Dear Neighbour* card and *Good Neighbour Policy* to support informal, respectful resolution of issues.

Partnership Working

We work closely with the Community Safety Team, Police, youth services, and voluntary organisations to deliver coordinated prevention and early intervention, including:

- Community safety campaigns
- Youth diversion activities
- Targeted outreach in high-risk areas

Education and Awareness

We promote understanding and responsible behaviour through campaigns on:

- Noise nuisance
- Hate crime
- Responsible pet ownership
- Fireworks and seasonal ASB

These are delivered through newsletters, social media, and community events to keep residents informed and engaged.

12. Delivering Inclusive and Accessible Services

Equality, Diversity and Inclusion

We will:

- Follow the Equality Act 2010 and Brent's Equality, Diversity and Inclusion (EDI) Strategy.
- Challenge discrimination and promote equity in service delivery by ensuring our decisions, actions, and communication are fair, inclusive, and aligned with the Equality Act 2010. This includes adapting our services to meet diverse needs.

Accessible Services for All

We will:

- Offer interpreting services as a default for residents and families who speak English as an additional language, ensuring they can fully understand the ASB process, their rights, and any actions required.
- Offer information in accessible formats such as easy read or large print.
- Use inclusive and representative language and imagery in our communications.

Skilled and Representative Workforce

We will:

- Provide staff training in unconscious bias, trauma-informed practice and cultural awareness.
- Encourage staff to use their own lived experience to help shape services.

Tailored Support for Diverse Communities

Working with Local Communities

We will:

- Work closely with faith groups and community organisations.
- Codesign approaches that are culturally sensitive and locally relevant.

Personalised Case Management

We will:

- Tailor support to individual needs, including cultural background, language, disability, mental health, and other factors

13. Reviewing cases when requested: Anti-Social Behaviour Case Review

Review Process

We are committed to delivering a fair, transparent, and accountable service. If a resident is unhappy with how their anti-social behaviour (ASB) case has been handled, we provide clear routes for review, escalation, and independent oversight.

If a resident feels that their ASB concerns have not been addressed despite repeated reports, they can request a formal case review through the Community Trigger process.

What is Community Trigger?

Community Trigger allows residents to request a multi-agency review of their ASB case if they believe no effective action has been taken.

Eligibility Criteria

A Community Trigger can be activated if:

- Three or more incidents of anti-social behaviour (ASB) have been reported within a six-month period.

Each incident must have been:

- Reported within one month of it occurring.
- Reported to the same organisation (e.g. council, police, housing provider) or a mix of these, if they relate to separate incidents.
- The reports must concern the same issue or perpetrator.

The applicant can be:

- The victim of the ASB
- Or someone acting on their behalf (e.g. a carer, Councillor, or community group)

How We Respond

- We coordinate a review with relevant partners (e.g. police, Community Safety Team)
- The review considers all previous actions and whether further steps are needed
- The resident is informed of the outcome and any additional actions agreed

Complaints Procedure

If you are unhappy with the anti-social behaviour service we have provided or arranged, please tell us so we can try to put things right. We will always try to resolve your issue at the first point of contact. If that's not possible, you can raise a formal complaint and confirm that you are happy with us taking this route.

Your complaint will be handled in line with the [Brent Council Complaints Policy](#).

14. Supporting and developing our workforce

To make sure you receive a safe, fair and professional service, all our Area Tenancy Managers are trained to deal with ASB. Our training helps officers respond confidently, understand residents' needs, and follow best practice.

- Supervision and Case Reviews
- Staff receive regular supervision and participate in team case reviews to reflect on practice, share learning, and maintain quality.

Access to Specialist Support

- Officers can consult with legal teams, safeguarding leads, and the Community Safety Team for guidance on complex or high-risk cases.
- We support staff progression through mentoring, secondments, and access to formal qualifications in housing, enforcement, and community safety.

Wellbeing and Resilience

We promote staff wellbeing through access to mental health support, flexible working arrangements, and a culture of peer support.

Performance and Accountability

We set clear expectations for case handling and communication, and we monitor performance to ensure high standards are maintained across the service.

15. Monitoring our performance

- This policy will be formally reviewed at regular intervals to ensure it remains aligned with legislation, best practice, and local priorities. Governance changes, updates, or amendments will be approved through the council's

decision-making processes and communicated to staff and residents as appropriate.

- We will monitor performance through a set of agreed Key Performance Indicators (KPIs), including response times, case outcomes, resident satisfaction, partnership activity, and the use of enforcement tools. Service performance will be reviewed regularly through internal governance boards and relevant scrutiny panels to ensure transparency and accountability.
- An interim review will be conducted within the first year of implementation to assess early impact, operational effectiveness, and any required refinements.
- We will also evaluate the effectiveness of multi-agency work through monitoring activity and outcomes from partnership forums such as BJAG and MARAC.
- Resident feedback gathered through surveys, case follow-ups, and engagement activities will inform ongoing service improvements.
- We will regularly monitor staff training and development needs to ensure all officers are equipped to deliver the policy effectively and in accordance with legal requirements

16. Data Protection

We protect residents' personal data in line with UK GDPR and the Data Protection Act 2018 by ensuring informed consent, strict confidentiality, secure storage, and full access rights for residents over their information.

17. Glossary of Terms

Term	Definition
Antisocial Behaviour (ASB)	Behaviour that causes, or is likely to cause, harassment, alarm, distress, or nuisance to others - especially in homes or neighbourhoods.
Community Trigger (ASB Case Review)	A process that lets victims ask for their ASB case to be reviewed by several agencies if they feel it has not been handled properly.
Community Protection Notice (CPN)	A legal notice telling a person or organisation to stop behaviour that is harming the community's quality of life.
Public Spaces Protection Order (PSPO)	A rule made by the council to stop certain behaviours - such as street drinking in public places to reduce ASB.

Closure Order	A legal power to close a property when it is linked to serious nuisance, crime, or disorder (for example, drug activity).
Civil Injunction	A court order that requires someone to stop doing ASB. Breaking it can lead to arrest or further legal action.
Criminal Behaviour Order (CBO)	An order made by a court after someone is convicted of a crime, placing rules or restrictions on them to stop future ASB.
Acceptable Behaviour Contract (ABC)	A voluntary agreement between a person and the council or police that sets out behaviour expectations and consequences.
Mediation	A private and voluntary process where an independent person helps people in dispute talk and agree on a solution.
Victim Centred Approach	An approach that focuses on the safety, needs, and wellbeing of the person experiencing ASB, especially if they are vulnerable.
Risk Assessment	A structured way of checking how serious a case is and whether someone is at risk, to help decide the right response.
Tenancy Breach	When a tenant breaks the rules of their tenancy agreement for example, by causing ASB or allowing others to do so.
Multi Agency Working	When the council works together with police, health services, housing providers, and other partners to tackle ASB.

EQUALITY IMPACT ASSESSMENT (EIA)

POLICY/PROPOSAL:	Anti-Social Behaviour Policy
DEPARTMENT:	Housing Services
TEAM:	Quality, Assurance & Standards Team
LEAD OFFICER:	Iptisam Gedi
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 Anti-Social Behaviour (ASB) Policy sets out how Brent Council Housing Management Service will prevent, investigate, and respond to reports of anti-social behaviour. Its aim is to create safer communities by adopting a victim-centred, risk-based approach, promoting early intervention and prevention, supporting vulnerable residents, and taking appropriate enforcement action where necessary

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

The Policy will affect all groups. The policy may impact all residents who access the Housing Management Service; however, particular consideration has been given to groups who may be disproportionately affected by anti-social behaviour or who may face barriers to reporting incidents or accessing support. These include:

- Older and younger people (Age)
- Care experienced individuals
- Disabled people, including those with physical, sensory, learning, mental health, and non-visible disabilities
- Transgender and non-binary people (Gender Reassignment)
- Pregnant women and new parents (Pregnancy and Maternity)
- People from different racial, ethnic, and national backgrounds (Race and Ethnicity)
- People of different religions and beliefs, including those with no faith (Religion or Belief)
- Women and men, including consideration of Violence Against Women and Girls (VAWG) (Sex)
- LGBTQ+ residents (Sexual Orientation)
- Residents experiencing poverty or socio-economic disadvantage (Socio-Economic Status)
- Residents experiencing domestic abuse, harassment, hate crime, safeguarding concerns, social isolation, or other vulnerabilities.

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	X		

maternity leave, or new parents.			
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 part of the policy development process, the service has undertaken consultation with staff, tenants and leaseholders to gather feedback on the proposed Anti-Social Behaviour (ASB) Policy and to identify any areas that may require further clarification, improvement, or enhanced accessibility. The policy has also been informed by resident feedback, case management experience, and learning from ASB cases managed across the Housing Management Service.

Evidence used to inform the policy includes:

- Existing ASB case data, including the nature of reports received, case outcomes, vulnerability assessments and the support needs of residents affected by anti-social behaviour.
- Tenant Satisfaction Measures (TSM) and other resident engagement activities, which provide insight into residents' experiences of housing services, community safety, communication, and service accessibility.
- Legislative and regulatory requirements, including the Anti-Social Behaviour, Crime and Policing Act 2014, Equality Act 2010, Domestic Abuse Act 2021, and the Regulator of Social Housing's Neighbourhood and Community Standard.
- National guidance and best practice published by the Housing Ombudsman, Chartered Institute of Housing (CIH), National Housing Federation, and relevant government departments.

The policy recognises that certain groups, including disabled residents, older people, young people, victims of domestic abuse, women and girls, residents experiencing hate incidents, and other vulnerable individuals, may be disproportionately affected by ASB. Particular consideration has therefore been given to resident safety, safeguarding, accessibility, equality, and support needs throughout the policy.

The Council will continue to monitor ASB reports, case outcomes, resident satisfaction data, complaints, and feedback received through engagement activities to identify any emerging trends or unequal impacts and to inform future policy reviews and service improvements.

7. For each characteristic:

- a. 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 policy is expected to have a positive impact on residents of all ages by promoting safer neighbourhoods and ensuring that reports of ASB are managed using a risk-based approach. Particular consideration is given to vulnerable residents, including older people, children, and young people who may be disproportionately affected by ASB, harassment, intimidation, or safeguarding concerns.	
--	--

Care Experience	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy is expected to have a positive impact on care experienced residents by ensuring reports are assessed based on individual vulnerability and support needs. Residents who may be vulnerable due to previous trauma, social isolation, or safeguarding concerns will be offered appropriate support and referrals.	

Disability	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy is expected to have a positive impact on disabled residents by recognising that they may be disproportionately affected by ASB and may require additional support, reasonable adjustments, or accessible communication.	

Gender Reassignment	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy is expected to have a positive impact by ensuring reports of harassment, intimidation, hate incidents, and discrimination are taken seriously and responded to fairly, regardless of gender identity.	

Marriage and Civil Partnership	
	Provide supporting data and evidence.
The policy is not expected to have any specific impact on individuals because of their marital or civil partnership status. The policy applies equally to all residents.	

Pregnancy and Maternity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy is expected to have a positive impact by supporting the safety and wellbeing of pregnant women and new parents who may be more vulnerable to the effects of ASB, harassment, and community safety concerns.	

Race and Ethnicity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy is expected to have a positive impact on residents from all racial and ethnic backgrounds by addressing hate-related incidents and ensuring services are accessible and inclusive.	

Religion or Belief	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy is expected to have a positive impact by ensuring that incidents motivated by religion or belief are taken seriously and investigated appropriately.	

Sex

Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy is expected to have a positive impact on both men and women. It places particular emphasis on resident safety and recognises the disproportionate impact that harassment, intimidation, and community safety concerns can have on women and girls.	

Sexual Orientation	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy is expected to have a positive impact by ensuring that residents are protected from harassment, discrimination, and hate-related incidents regardless of sexual orientation.	

Socio-Economic Status	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy is expected to have a positive impact on residents experiencing socio-economic disadvantage by helping to create safer communities and ensuring that vulnerable residents have access to advice, support, and appropriate interventions.	

Other Relevant Groups	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy is expected to have a positive impact on vulnerable groups, including victims of domestic abuse, carers, residents experiencing social isolation, refugees, asylum seekers, and those with safeguarding needs. It ensures that risks are identified early and that residents receive appropriate support and protection.	

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.

As part of the development of the Anti-Social Behaviour (ASB) Policy, our service undertook a range of engagement activities to understand the experiences of residents affected by ASB and hate crime and to ensure that the policy reflects resident needs and expectations.

In **December 2024**, the Council conducted **15 one-to-one interviews** with tenants who had reported ASB or hate crime during the previous year. Engagement focused on obtaining feedback from residents with direct experience of the service and included vulnerable residents, some of whom were supported by carers during the interview process. Efforts were made to capture a diverse range of perspectives across different age groups, genders, ethnic backgrounds, and residents living in ASB hotspot areas, including Kilburn and Queensbury.

In addition, a six-week public consultation was undertaken through the Council's Have Your Say portal between **4 June 2026 and 19 July 2026**. Residents were invited to comment on the proposed Anti-Social Behaviour Policy and provide feedback on the Council's approach to preventing, managing, and responding to ASB. Feedback was received from **28 residents**, and this informed a number of amendments to the final policy.

To supplement this consultation, the draft policy was presented at a workshop with **Brent Youth Parliament**. This engagement provided valuable feedback from **eight young residents** with experience of ASB in Brent, ensuring that the views and experiences of younger people were considered during policy development.

Key themes emerging from the engagement included the need for:

- Improved communication and regular case updates.
- Greater accountability and consistency in case management.
- Enhanced support for vulnerable residents and victims.
- Improved confidentiality and anonymity for residents reporting incidents.
- Clearer information on reporting routes, available support, and the Council's powers.
- A stronger focus on hate crime, community safety, and resident wellbeing.
-

The feedback received directly informed several enhancements to the policy, including strengthened communication standards, the introduction of named case officers, improved information on reporting routes and support services, enhanced victim-centred and safeguarding approaches, and a greater emphasis on prevention, partnership working, and resident safety.

The engagement activities involved a broad range of residents who are representative of many of the groups affected by the policy. Ongoing engagement will continue through resident forums, surveys, complaints feedback, and future policy reviews to ensure that the experiences of all residents, particularly vulnerable and underrepresented groups, continue to inform service improvements

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

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 Assessment concludes that the Anti-Social Behaviour (ASB) Policy is expected to have an overall positive impact on Brent Council tenants, leaseholders and residents. The policy promotes community safety, supports victims of ASB and hate-related incidents, strengthens safeguarding arrangements, and ensures a fair, consistent and victim-centred approach to case management.

The assessment found that the policy is likely to have particular benefits for vulnerable residents, including older people, disabled residents, women and girls, victims of domestic abuse, residents experiencing hate incidents, and those who may be disproportionately affected by anti-social behaviour. The policy includes measures to improve accessibility, communication, support, partnership working, and early intervention, helping to ensure that residents receive appropriate assistance and protection.

No significant adverse impacts have been identified. While some residents may require additional support to access services or engage with the ASB process, these risks are mitigated through vulnerability assessments, safeguarding procedures, accessible reporting methods, interpreting services, reasonable adjustments, tailored support, and referrals to specialist agencies where appropriate.

Resident engagement and consultation have informed the development of the policy and resulted in a number of improvements, including stronger communication standards, clearer reporting routes, enhanced victim support, greater accountability, and an increased focus on resident safety and prevention. These changes are expected to strengthen the positive impact of the policy across all resident groups.

Overall, the policy supports Brent Council's obligations under the Equality Act 2010 and contributes to eliminating discrimination, advancing equality of opportunity, and fostering good relations within communities. The policy should therefore proceed as proposed, with ongoing monitoring and resident engagement used to identify opportunities for further improvement.

SECTION D - RESULT

Select one of the following options with an "X".

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	
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B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	X
C	CHANGE/ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN 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
Lack of training and awareness from staff on ASB Policy	Commit to sharing and training staff on the new ASB procedures & Policy, including awareness of equality implications	Iptisam Gedi	08.04.27	

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

The impact of the Anti-Social Behaviour Policy will be monitored through regular review of ASB performance data, case outcomes, resident satisfaction measures, complaints, compliments, and feedback received through engagement activities. The Council will analyse trends relating to vulnerability, safeguarding, hate incidents, domestic abuse, and protected characteristics where data is available to identify any disproportionate impacts on particular groups.

Monitoring will also include:

- Performance against ASB service standards and key performance indicators (KPIs).
- Review of response times, case resolutions, enforcement activity, and resident satisfaction levels.
- Analysis of complaints and ASB Case Reviews (Community Triggers).
- Feedback from residents, tenant forums, consultations, and engagement activities.
- Review of outcomes from partnership working arrangements, including multi-agency forums such as BJAG and MARAC.
- Ongoing review of equality, accessibility, safeguarding, and vulnerability considerations within case management.

The policy will be formally reviewed on a regular basis, or sooner where legislative, regulatory, operational, or equality considerations indicate that changes are required. Findings from monitoring activities will be used to identify service improvements, inform future policy reviews, and ensure the policy continues to deliver fair, accessible, and effective outcomes for all residents.

SECTION F – SIGN OFF

	Signature	Date
Officer:	Iptisam Gedi	17 August 2026
Reviewing Officer or Head of Service	Spencer Randolph	

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:	

Compliance Policies Appendices

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London Borough of Brent

Asbestos Policy 2026- 2027

This policy sets out Brent Council's approach to the safe identification, assessment and management of asbestos-containing materials across its housing stock and premises. It establishes the responsibilities, controls and assurance arrangements required to prevent exposure to asbestos and ensure compliance with relevant legislation and regulatory requirements.

Owner:	Spencer Randolph, Director of Housing Services	
Approved by:	DMT/Board/Cabinet	Insert date in format dd/mm/yyyy
Review cycle: (years)	1	
Next review date:	dd/mm/yyyy	



Regulator:	<ul style="list-style-type: none"> • Health and Safety Executive (HSE) • Regulator of Social Housing (RSH) – Safety and Quality Standard • Building Safety Regulator (BSR)
Legislation:	<ul style="list-style-type: none"> • Control of Asbestos Regulations 2012 (CAR 2012) • Health and Safety at Work etc. Act 1974 • Management of Health and Safety at Work Regulations 1999 • Control of Substances Hazardous to Health Regulations 2002 (COSHH) • Construction (Design and Management) Regulations 2015 (CDM 2015) • Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) • Building Safety Act 2022 • Housing Act 2004, including the Housing Health and Safety Rating System (HHSRS)
Codes of Practice:	<ul style="list-style-type: none"> • HSE L143 – Managing and working with asbestos: Control of Asbestos Regulations 2012. Approved Code of Practice and guidance • HSE HSG264 – Asbestos: The survey guide • HSE HSG248 – Asbestos: The analysts' guide • HSE HSG227 – A comprehensive guide to managing asbestos in premises
The policy also operates in the context of:	<ul style="list-style-type: none"> • Asbestos Management Plan • Resident Engagement Strategy • Gas Safety Policy • Electrical Safety Policy • M&E Services Policy • Fire Policy • Water Safety Policy • Health & Safety Policy • Complaints Policy • Damp & Mould Policy • Repairs and Maintenance Policy • No Access Policy

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1. Purpose

The purpose of this Policy is to set out Brent Council's commitment to the safe management of asbestos-containing materials (ACMs) across all residential and operational premises. It establishes the framework for compliance with the Control of Asbestos Regulations 2012 (CAR 2012) and related legislation, ensuring that ACMs are identified, assessed, recorded, and managed safely throughout the lifecycle of each building.

This Policy supports Brent Council's wider Building Safety Strategy and fulfils statutory duties under the Health and Safety at Work etc. Act 1974 and the Building Safety Act 2022, protecting residents, employees, contractors, and visitors from the risks associated with asbestos exposure.

2. Scope

This policy applies to:

- All residential buildings owned or managed by Brent Council. Including general needs housing, supported and sheltered schemes, temporary accommodation, and houses in multiple occupation (HMOs).
- All communal areas, boiler rooms, and plant spaces under Brent Council's Housing and Property Services.
- Any operational or commercial premises managed by Brent Council where ACMs may be present.
- All Brent Council staff, contractors, consultants, and partner organisations involved in housing management, maintenance, or compliance services that could affect building safety.

Leasehold-only dwellings are outside the direct legal duty under CAR 2012; however, Brent Council will provide advice and cooperate with leaseholders where ACMs could affect shared parts of a building.

Non-Housing corporate premises are covered under the Council's Corporate Health and Safety Policy.

3. Policy Statement

Brent Council recognises that asbestos, when disturbed or damaged, presents a serious risk to health and remains a significant legacy issue within social-housing stock. The Council will therefore take all reasonably practicable measures to prevent exposure to asbestos fibres and to comply fully with all statutory requirements.

Brent Council's policy is to:

- **Identify and Assess** all ACMs within its property portfolio through systematic surveys undertaken by competent persons.
- **Maintain an Asbestos Register** and ensure this information is accurate, accessible, and updated following any survey, inspection, or remedial work.
- **Manage Risk Proportionately**, ensuring ACMs in good condition remain undisturbed and are subject to regular inspection, while damaged or high-risk materials are safely remediated or removed.
- **Ensure Competence** by engaging only UKAS-accredited consultants and HSE-licensed asbestos contractors. All asbestos-related work will be carried out only by competent persons holding UKATA or BOHS accreditation, and, where required, by HSE-licensed contractors.
- **Inform and Protect Residents**, staff, and contractors by providing clear information about asbestos risks and control measures.
- **Maintain Robust Governance**, performance monitoring, and assurance processes to verify ongoing compliance.
- **Promote Transparency and Learning**, sharing lessons from audits, incidents, and regulatory updates to drive continuous improvement.
- **Share Information** by providing access to asbestos register information. This will be controlled and provided on a need-to-know basis to protect residents, staff, and contractors, while ensuring that anyone who may disturb ACMs has the information necessary to work safely.

This policy reflects Brent Council's commitment to a proactive, risk-based, and transparent approach to Building Safety management across all its housing assets, in order to protect the health and wellbeing of residents and others.

3.1 Equality, Diversity and Inclusion

This policy embodies Brent Council's commitment to Equality, Diversity and Inclusion within our work and the services we provide. Please refer to our Equality, Diversity and Inclusion Strategy here: [brent-equity-diversity-and-inclusion-strategy-2024-28-digital-version-v2.pdf](#)

Brent Council will ensure that Asbestos Safety measures consider the diverse needs of residents and staff, including those with disabilities, language barriers or additional vulnerabilities, in line with the Equality Act 2010.

4. Strategic Principles

Brent Council's approach to implementing this policy is guided by the following principles:

4.1 Lifecycle Asbestos Management

- Brent Council will use a formal material and priority risk scoring system based on HSG264 to inform reinspection frequency and remedial actions.
- Asbestos management will be embedded at every stage of a building's lifecycle – design, construction, occupation, refurbishment, and end-of-life.
- Designers and project managers must consider asbestos information at concept and pre-construction stages, referencing the Asbestos Register to prevent disturbance of known materials.
- Demolition or major refurbishment will only proceed following an intrusive refurbishment and demolition survey and the safe removal of identified ACMs.

4.2 Risk-Based and Proportionate Control

- Controls and resources will be prioritised based on property risk profiles, occupancy type, and building age.

4.3 Governance and Accountability

- Clear lines of accountability are fundamental. Duty holders and Responsible Persons are formally designated to ensure strategic oversight and operational delivery.
- The Council's Housing Compliance Board will review performance and escalate issues to the Chief Executive and Cabinet where necessary.

4.4 Competence and Training

- Only competent, trained personnel and licensed contractors shall undertake asbestos work. Staff whose duties may bring them into contact with ACMs will receive asbestos-awareness training; managers and compliance officers will undertake additional training in risk assessment, contractor control, and legal duties.

4.5 Resident Engagement and Inclusion

- Residents and leaseholders will be kept informed about asbestos within their homes and communal areas.
- Residents will receive asbestos awareness information at tenancy sign-up and prior to or following any asbestos survey or remedial work in their home.
- We will seek to engage residents through communications and, where appropriate, consultation on major works.
- Particular consideration will be given to residents who may be at higher risk to ensure suitable additional measures or adjustments are in place.

4.6 Monitoring, Audit and Continuous Improvement

- Asbestos safety performance will be reviewed and verified through regular inspections, internal and external audits, and data analysis.

- Brent Council is committed to learning from any Building Safety incidents, audit findings, or near-misses, as well as updates in legislation or best practice, in order to continually improve our safety management systems and procedures.

4.7 Open Safety Culture

- Brent Council will promote a just and open culture where employees, contractors, and residents can report Asbestos Safety concerns without fear of reprisal. All reports will be investigated, acted upon, and used to strengthen system-wide learning.

5. Governance and Accountability

Brent Council operates a clear governance framework that defines strategic accountability and operational responsibility for Asbestos Safety across all housing assets. The structure ensures effective oversight, competent delivery, and continuous improvement.

5.1 Duty Holder

The Chief Executive is the Council's Duty Holder for health and safety and retains ultimate accountability for Asbestos Safety compliance. They ensure that appropriate arrangements, competent personnel, and sufficient financial and organisational resources are in place to manage the risks of asbestos across all Brent Council housing stock.

This accountability is supported through the Council's governance framework, including the Brent Housing Committee Board, internal audit, and reports to the Cabinet and Audit & Assurance Committee.

5.2 Asbestos Management and Assurance

Strategic Responsible Person	Name	Spencer Randolph
	Position	Director Housing Services
	Email	spencer.randolph@brent.gov.uk
	Responsibilities	Holds strategic accountability for asbestos compliance; approves Policy and Management Plan; secures resources; ensures asbestos management is integrated into the wider Building Safety Strategy; reports to the Chief Executive and governance boards.
Deputy	Name	Gary Mitchell

Strategic Responsible Person	Position	Head of Service Housing Management Property
	Email	gary.mitchell@brent.gov.uk
	Responsibilities	Supports and deputises for the Strategic Responsible Person. Coordinates the delivery of the Asbestos Safety strategy across departments, ensuring collaboration between housing, asset management, and compliance teams. Monitors performance data, escalates significant risks, and ensures that Asbestos Safety is given appropriate priority within service planning.
Local Responsible Person	Position	Strategic Compliance Manager
	Responsibilities	Leads operational implementation, maintains the asbestos register, oversees surveys, re-inspection, and remedial programmes, ensures contractor competence, and acts as the main contact for regulators and auditors.
Compliance Lead (Contract Manager)	Position	Contract and Compliance Manager Fire and Asbestos
	Responsibilities	Manages asbestos compliance contracts. Verifies survey quality and remedial works. Tracks KPIs and SLAs. Provides technical advice on standards and best practices.

6.3 Employees

All employees must cooperate with asbestos management arrangements, follow safe systems of work, complete training, and report suspected ACM damage or disturbance immediately.

6.4 Residents and Leaseholders

Residents and leaseholders must cooperate with asbestos management procedures, allow access for inspections or remedial works, and refrain from disturbing materials identified as containing or suspected to contain asbestos. Where access is not provided, Brent Council will escalate the matter promptly and may take enforcement or legal action to ensure statutory safety duties are met.

6.5 Contractors

All contractors must hold current UKAS or HSE licences appropriate to their scope of work, comply with Brent Council's Asbestos Procedures, and provide risk

assessments and method statements before commencing work. Poor performance or non-compliance may result in suspension or removal from the approved supplier list.

7. Monitoring and Assurance

Compliance with this Policy will be monitored and verified through both ongoing performance tracking and periodic reviews. These reports enable senior management to review safety performance and address any areas of concern.

- Key performance indicators (KPIs) will be reported monthly to the Brent Housing Committee Board.
- Audits will be conducted to provide assurance that the Council's Policies and Management Plans remain effective and compliant with current legislation and best practice.
- The Asbestos Management Plan outlines in detail how compliance will be achieved and evidenced, including the use of our chosen compliance monitoring system (True Compliance). We will utilise such systems to maintain accurate records and produce management reports.
- A formal review of this policy will take place every 12 months, or sooner if legislation or best practice changes.

8. Communication

This policy will be published on Brent Council's website and made available to all relevant stakeholders, including residents, staff, and contractors. Brent Council will communicate with residents about safety in their buildings through appropriate channels.

Residents dissatisfied may escalate concerns in line with the Brent Council Complaints Policy.

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London Borough of Brent

Fire Safety Policy 2026- 2027

This policy sets out Brent Council's approach to managing fire safety across its housing stock, ensuring compliance with relevant legislation and maintaining effective fire safety arrangements throughout the lifecycle of its buildings. It defines the responsibilities and oversight needed to manage fire risks and protect residents and others.

Owner:	Spencer Randolph, Director of Housing Services	
Approved by:	DMT/Board/Cabinet	dd/mm/yyyy
Review cycle: (years)	1	
Next review date:	dd/mm/yyyy	



Regulator:	<ul style="list-style-type: none"> • Health and Safety Executive (HSE) • London Fire Brigade (LFB) • Regulator of Social Housing (RSH) – Safety and Quality Standard • Building Safety Regulator (BSR)
Legislation:	<ul style="list-style-type: none"> • Regulatory Reform (Fire Safety) Order 2005 • Fire Safety Act 2021 • Fire Safety (England) Regulations 2022 • Building Safety Act 2022 • Housing Act 2004, including the Housing Health and Safety Rating System (HHSRS) • Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022 • Health and Safety at Work etc. Act 1974 • Building Regulations 2010
Codes of Practice:	<ul style="list-style-type: none"> • BS 9997:2019 – Fire Safety Management Systems • PAS 79 – Fire Risk Assessment • PAS 9980:2022 – Fire Risk Appraisal of External Wall Construction and Cladding • Approved Document B – Fire Safety • Fire Safety Risk Assessment guidance issued by the Home Office • Regulatory Reform (Fire Safety) Order 2005 – HM Government Fire Safety Risk Assessment guidance series
The policy also operates in the context of:	<ul style="list-style-type: none"> • Fire Safety Management Plan • Resident Engagement Strategy • Gas Safety Policy • Electrical Safety Policy • M&E Services Policy • Asbestos Policy • Water Safety Policy • Health & Safety Policy • Repairs and Maintenance Policy • Complaints Policy

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1. Purpose

The purpose of this policy is to set out Brent Council's commitment to managing Fire Safety across its housing portfolio and to demonstrate compliance with all relevant fire safety legislation. Our objective is to protect life, property, and the wider community through a robust safety culture embedded at every level of the organisation.

This policy ensures that Brent Council, as a landlord, freeholder, and employer, meets its legal duties as the Responsible Person under the Regulatory Reform (Fire Safety) Order 2005, and as an Accountable Person under the Building Safety Act 2022.

2. Scope

This policy applies to:

- All residential properties owned or managed by Brent Council and have a common area. Including general needs, supported and sheltered housing, temporary accommodation, and houses in multiple occupation (HMOs).
- Communal areas within mixed-tenure and leasehold buildings where Brent retains responsibility for safety.
- All Brent Council staff, contractors, and partners involved in housing management, maintenance, or compliance services that could affect Building Safety.

Non-Housing corporate premises are covered under the Council's Corporate Health and Safety Policy.

This Policy applies to all fire life-safety systems within Brent Council's residential housing stock, including fire detection and alarm systems, emergency lighting, firefighting equipment, smoke control systems, evacuation strategies, and resident fire safety measures. It does not govern electrical installation safety, mechanical plant safety, or general building services, which are addressed under separate specialist policies.

3. Policy Statement

Brent Council recognises its duties as the "Responsible Person" under the Regulatory Reform (Fire Safety) Order 2005 and as an "Accountable Person" under the Building Safety Act 2022. We are committed to protecting life, property, and the wider community through a robust and transparent fire safety culture embedded at every level of the organisation.

Our policy is to:

- **Comply Fully** with all relevant fire safety legislation, regulations, and codes of practice, and to proactively adapt to emerging requirements or guidance.
- **Prevent Fires** by ensuring robust risk management, design-stage fire safety integration, and effective maintenance of fire protection measures.
- **Embed Fire Safety** through the entire lifecycle of every building, from design and construction through occupation, maintenance, refurbishment, and disposal. Supported by a “golden thread” of accurate, up-to-date information.
- **Ensure Competence and Accountability** by training all staff, contractors, and agents involved in fire safety to appropriate levels and holding them accountable for compliance with their duties.
- **Engage openly with Residents and Leaseholders** by ensuring that everyone understands their role in maintaining fire safety and that vulnerable occupants receive additional support where needed.
- **Promote Continuous Improvement** by learning from incidents, audits, near misses, and resident feedback to enhance fire safety standards. Learning from within the sector, such as the Grenfell Inquiry recommendations.
- **Collaborate with interested Responsible Persons** by identifying and coordinating with any other Responsible Persons operating within the same premises (e.g. commercial tenants, managing agents) and will cooperate to ensure fire safety arrangements and information sharing are effective across shared buildings.

This policy reflects Brent Council's commitment to a proactive, risk-based, and transparent approach to Building Safety management across all its housing assets, in order to protect the health and wellbeing of residents and others.

3.1 Equality, Diversity and Inclusion

This policy embodies Brent Council's commitment to Equality, Diversity and Inclusion within our work and the services we provide. Please refer to our Equality, Diversity and Inclusion Strategy here: [brent-equity-diversity-and-inclusion-strategy-2024-28-digital-version-v2.pdf](#)

Brent Council will ensure that Asbestos Safety measures consider the diverse needs of residents and staff, including those with disabilities, language barriers or additional vulnerabilities, in line with the Equality.

4. Strategic Principles

Brent Council's approach to implementing this policy is guided by the following principles:

4.1 Lifecycle Fire Safety and the Golden Thread

- Fire safety will be embedded throughout each building's lifecycle: design, construction, handover, occupation, refurbishment, and end-of-life.
- A robust information management system will maintain the "golden thread" of fire safety data to support informed decision-making and compliance assurance.

4.2 Risk-Based and Proportionate Management

- A proportionate, risk-based approach will be applied to fire safety management. Controls and resources will be targeted according to the nature, height, use, and occupancy of each building.

4.3 Governance and Accountability

- Fire safety performance will be assured through defined lines of responsibility, clear reporting routes, and active oversight by the Brent Housing Compliance Board, Cabinet, and Audit & Assurance Committee.
- A nominated Duty Holder, Strategic Responsible Person, and Building-Level Responsible Persons will provide leadership and accountability at every level.

4.4 Competence and Continuous Development

- All staff and contractors involved in Fire Safety will be suitably trained and qualified. Competence will be maintained through ongoing professional development and independent verification where appropriate.

4.5 Resident Engagement and Inclusion

- Residents and leaseholders will be kept informed about fire safety arrangements in their homes and buildings.
- Brent Council will encourage active participation through consultations, Building Safety Meetings, and resident feedback mechanisms.
- Particular consideration will be given to vulnerable residents through Person-Centred Fire Risk Assessments (PCFRAs) and Personal Emergency Evacuation Plans (PEEPs).

4.6 Monitoring, Audit and Continuous Improvement

- Fire Safety performance will be reviewed and verified through regular inspections, internal and external audits, and data analysis.
- Brent Council is committed to learning from any Fire Safety incidents, audit findings, or near-misses, as well as updates in legislation or best practice, in order to continually improve our Building Safety management systems and procedures.

4.7 Open Safety Culture

- Brent Council will promote a just and open culture where employees, contractors, and residents can report fire safety concerns without fear of reprisal. All reports will be investigated, acted upon, and used to strengthen system-wide learning

5. Governance and Accountability

Brent Council operates a clear governance framework that defines strategic accountability and operational responsibility for fire safety across all housing assets. The structure ensures effective oversight, competent delivery, and continuous improvement.

5.1 Duty Holder

The Chief Executive is the Council's Duty Holder for health and safety and retains ultimate accountability for fire safety compliance. They ensure that appropriate arrangements, competent personnel, and sufficient financial and organisational resources are in place to manage fire safety risks across all Brent Council housing stock.

This accountability is supported through the Council's governance framework, including the Brent Housing Committee Board, internal audit, and reports to the Cabinet and Audit & Assurance Committee.

5.2 Fire Safety Management and Assurance

Strategic Responsible	Name	Spencer Randolph
	Position	Director Housing Services
	Email	spencer.randolph@brent.gov.uk

Person	Responsibilities	Holds overall strategic accountability for compliance with fire safety legislation and standards. Approves the Fire Safety Policy and Management Plan, secures resources, and ensures that fire safety is integrated within the wider Building Safety and Asset Management Strategy. Champions a positive safety culture and ensures that performance and risks are reported to the Chief Executive and corporate governance boards.
Deputy Strategic Responsible Person	Name	Gary Mitchell
	Position	Head of Service Housing Management Property
	Email	gary.mitchell@brent.gov.uk
	Responsibilities	Supports and deputises for the Strategic Responsible Person. Coordinates the delivery of the fire safety strategy across departments, ensuring collaboration between housing, asset management, and compliance teams. Monitors performance data, escalates significant risks, and ensures that fire safety is given appropriate priority within service planning.
Local Responsible Person	Position	Strategic Compliance Manager
	Responsibilities	Provides assurance that operational arrangements for fire safety are effective and compliant. Oversees the implementation of the Fire Safety Management Plan, monitors contractor performance, and ensures that records, risk assessments, and statutory inspections are accurate and up to date. Acts as the principal contact for regulators, the London Fire Brigade, and other enforcing authorities.
Compliance Lead (Contract Manager)	Position	Contract and Compliance Manager Fire and Asbestos
	Responsibilities	Acts as the Council's professional lead for fire safety compliance. Manages the delivery of inspection, testing, and remedial programmes, verifies contractor competence, and monitors KPIs and SLAs. Provides expert advice to the Local Responsible Person on technical standards, legislation, and best practice.

5.3 Employees

All employees must cooperate with the Council's fire safety arrangements, follow

safe systems of work, complete relevant training, and report hazards or concerns promptly.

5.4 Residents and Leaseholders

Residents and leaseholders must comply with fire safety instructions, allow reasonable access for inspections, and maintain communal areas free from obstructions. They are encouraged to report concerns immediately.

5.5 Contractors

All contractors must demonstrate competence and comply with Brent Council's fire safety procedures and legal requirements. Failure to do so may result in suspension or removal from approved supplier lists.

6. Monitoring and Assurance

Compliance with this Policy will be monitored and verified through both ongoing performance tracking and periodic reviews. These reports enable senior management to review safety performance and address any areas of concern.

- Key performance indicators (KPIs) will be reported monthly to the Brent Housing Committee Board.
- Audits will be conducted to provide assurance that the Council's Policies and Management Plans remain effective and compliant with current legislation and best practice.
- The Fire Safety Management Plan outlines in detail how compliance will be achieved and evidenced, including the use of our chosen compliance monitoring system (True Compliance). We will utilise such systems to maintain accurate records and produce management reports.
- A formal review of this policy will take place every 12 months, or sooner if legislation or best practice changes.

7. Communication

This policy will be published on Brent Council's website and made available to all relevant stakeholders, including residents, staff, and contractors. Brent Council will communicate with residents about safety in their buildings through appropriate channels. In accordance with

Fire Safety (England) Regulations 2022, Brent Council will publish FRA summaries for high-rise buildings.

Residents may raise complaints regarding fire safety concerns through the Brent Council Complaints Policy.

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London Borough of Brent

Gas Safety Policy 2026- 2027

This policy sets out Brent Council's approach to ensuring gas safety across its housing stock. It establishes the arrangements for meeting the Council's statutory duties and managing the risks associated with gas in residents' homes.

Owner:	Spencer Randolph, Director of Housing Services	
Approved by:	DMT/Board/Cabinet	Insert date in format dd/mm/yyyy
Review cycle: (years)	1	
Next review date:	dd/mm/yyyy	



Regulator:	<ul style="list-style-type: none"> • Health and Safety Executive (HSE) • Regulator of Social Housing (RSH) – Safety and Quality Standard • Building Safety Regulator (BSR)
Legislation:	<ul style="list-style-type: none"> • Gas Safety (Installation and Use) Regulations 1998 (GSIUR) • Health and Safety at Work etc. Act 1974 • Management of Health and Safety at Work Regulations 1999 • Building Regulations 2010, including Part J – Combustion appliances and fuel storage systems • Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) • Housing Act 2004, including the Housing Health and Safety Rating System (HHSRS) • Construction (Design and Management) Regulations 2015 • Smoke and Carbon Monoxide Alarm (England) Regulations 2015, as amended by the Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022 • Equality Act 2010
Codes of Practice:	<ul style="list-style-type: none"> • HSE Approved Code of Practice L56 – Safety in the Installation and Use of Gas Systems and Appliances • HSE guidance on gas safety in residential accommodation • Gas Safe Register guidance and relevant industry standards • Relevant British Standards and other applicable technical standards
The policy also operates in the context of:	<ul style="list-style-type: none"> • Gas Safety Management Plan • Building Safety Management System • Resident Engagement Strategy • Fire Safety Policy • Electrical Safety Policy • Lifts and Lifting Equipment Policy • Asbestos Policy • Legionella Policy • Health & Safety Policy • Repairs and Maintenance Policy

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1. Purpose

The purpose of this policy is to set out Brent Council's commitment to the safe management of gas installations and appliances across all residential properties.

It establishes the framework for compliance with the Gas Safety (Installation and Use) Regulations 1998 (GSIUR) and related legislation, ensuring that all appliances, pipework, and flues are maintained safely and inspected at required intervals.

This policy forms part of Brent Council's wider Building Safety Strategy and aligns with the Council's statutory obligations under the Health and Safety at Work etc. Act 1974, ensuring residents, staff, and contractors are protected from the risk of fire, explosion, carbon monoxide poisoning, or gas leaks.

2. Scope

This policy applies to:

- All residential buildings owned or managed by Brent Council. Including general needs housing, supported and sheltered schemes, temporary accommodation, and houses in multiple occupation (HMOs).
- All communal gas installations, heating systems, and plant rooms under Brent Council control.
- All Brent Council staff, contractors, and partners involved in housing management, maintenance, or compliance services that could affect Building Safety.

Non-Housing corporate premises are covered under the Council's Corporate Health and Safety Policy.

3. Policy Statement

Brent Council recognises that gas safety is critical to maintaining safe homes and preventing loss of life, injury, or property damage.

This policy sets out the Council's framework for ensuring that all gas installations are installed, maintained, and tested in accordance with statutory requirements and industry best practice.

Our policy is to:

- **Comply Fully** with all gas safety legislation, including the Gas Safety (Installation and Use) Regulations 1998, and HSE's Approved Code of Practice (ACOP L56).

- **Ensure all Gas Appliances, flues, and Installations** are serviced and safety checked at least every 12 months by Gas Safe registered engineers.
- **Maintain valid Landlord Gas Safety Records (LGSRs)** for 100% of applicable properties at all times.
- **Implement Robust Data Management** and record-keeping using True Compliance to ensure full traceability of inspections, certificates, and remedial actions.
- **Ensure Competence** by engaging only qualified Gas Safe registered engineers to undertake gas work.
- **Promote Resident Safety and Awareness**, ensuring residents understand how to report faults, leaks, or access issues promptly.
- **Monitor Performance** through KPIs, audits, and governance reporting, ensuring continuous improvement and full compliance across the housing portfolio.

This policy reflects Brent Council's commitment to a proactive, risk-based, and transparent approach to Building Safety management across all its housing assets, in order to protect the health and wellbeing of residents and others.

3.1 Equality, Diversity and Inclusion

This policy embodies Brent Council's commitment to Equality, Diversity and Inclusion within our work and the services we provide. Please refer to our Equality, Diversity and Inclusion Strategy here: [brent-equity-diversity-and-inclusion-strategy-2024-28-digital-version-v2.pdf](#)

Brent Council will ensure that Gas Safety measures consider the diverse needs of residents and staff, including those with disabilities, language barriers or additional vulnerabilities, in line with the Equality Act 2010.

4. Strategic Principles

Brent Council's approach to implementing this policy is guided by the following principles:

4.1 Lifecycle Gas Safety Management

- Gas safety will be embedded throughout each building's lifecycle: design, construction, handover, occupation, refurbishment, and end-of-life.
- We will maintain accurate and up-to-date gas system information to inform decision-making and ensure continuity of safety measures over the life of the building.

4.2 Risk-Based and Proportionate Control

- A proportionate, risk-based approach will be applied to gas safety management.
- Controls and resources will be prioritised based on the nature, complexity, age, and occupancy of each property.

4.3 Governance and Accountability

- Clear lines of responsibility and robust governance arrangements will underpin Gas Safety management. Brent Council will designate specific duty holders and responsible persons for Gas Safety at strategic and operational levels.
- Gas Safety performance and compliance will be monitored through established governance structures, ensuring senior oversight and accountability for delivering this policy.

4.4 Competence and Training

- All staff and contractors involved in Gas Safety will be suitably trained and qualified. Competence will be maintained through ongoing professional development and independent verification where appropriate.
- Engineers must hold valid Gas Safe registration for the appropriate category of work.

4.5 Resident Engagement and Inclusion

- Residents and leaseholders will be kept informed about Gas Safety arrangements in their homes and buildings.
- Brent Council will provide residents with relevant information or instructions to help control gas risks.
- We will seek to engage residents through communications and, where appropriate, consultation on major works affecting gas systems.
- Particular consideration will be given to residents who may be at higher risk to ensure suitable additional measures or adjustments are in place.

4.6 Monitoring, Audit and Continuous Improvement

- Gas safety performance will be reviewed and verified through regular inspections, internal and external audits, and data analysis.
- Brent Council is committed to learning from any Building Safety incidents, audit findings, or near-misses, as well as updates in legislation or best practice, in order to continually improve our safety management systems and procedures.

4.7 Open Safety Culture

- Brent Council will promote a just and open culture where employees, contractors, and residents can report Gas Safety concerns without fear of reprisal. All reports will be investigated, acted upon, and used to strengthen system-wide learning.

5. Governance and Accountability

Brent Council operates a clear governance framework that defines strategic accountability and operational responsibility for Gas Safety across all housing assets. The structure ensures effective oversight, competent delivery, and continuous improvement.

5.1 Duty Holder

The Chief Executive is the Council's Duty Holder for health and safety and retains ultimate accountability for Gas Safety compliance. They ensure that appropriate arrangements, competent personnel, and sufficient financial and organisational resources are in place to manage gas risks across all Brent Council housing stock.

This accountability is supported through the Council's governance framework, including the Brent Housing Committee Board, internal audit, and reports to the Cabinet and Audit & Assurance Committee.

5.2 Gas Safety Management and Assurance

Strategic Responsible Person	Name	Spencer Randolph
	Position	Director Housing Services
	Email	spencer.randolph@brent.gov.uk
	Responsibilities	Holds overall strategic accountability for compliance with Gas Safety legislation and standards. Approves the Gas Safety Policy and Management Plan, secures resources, and ensures that Gas Safety is integrated within the wider Building Safety and Asset Management Strategy. Champions a positive safety culture and ensures that performance and risks are reported to the Chief Executive and corporate governance boards.
Deputy Strategic Responsible	Name	Gary Mitchell
	Position	Head of Service Housing Management Property
	Email	gary.mitchell@brent.gov.uk

Person	Responsibilities	Supports and deputises for the Strategic Responsible Person. Coordinates the delivery of the Gas Safety strategy across departments, ensuring collaboration between housing, asset management, and compliance teams. Monitors performance data, escalates significant risks, and ensures that Gas Safety is given appropriate priority within service planning.
Local Responsible Person	Position	Strategic Compliance Manager
	Responsibilities	Provides assurance that operational arrangements for Gas Safety are effective and compliant. Oversees the implementation of the Gas Safety Management Plan, monitors contractor performance, and ensures that records, certificates, and statutory inspections are accurate and up to date. Acts as the principal contact for regulators, auditors, and certification bodies
Compliance Lead (Contract Manager)	Name	John Roche
	Position	Contract and Compliance Manager Mechanical
	Email	John.Roche1@brent.gov.uk
	Responsibilities	Acts as the Council's professional lead for Gas Safety compliance. Manages the delivery of testing, inspection, and remedial programmes, verifies contractor competence, and monitors KPIs and SLAs. Provides expert advice to the Local Responsible Person on technical standards, legislation, and best practice.

5.3 Employees

All employees must cooperate with the Council's Gas Safety arrangements, follow safe systems of work, complete relevant training, and report hazards or faults immediately.

5.4 Residents and Leaseholders

Residents and leaseholders must cooperate with Gas Safety requirements, allow access for inspection and testing, and avoid tampering with fixed installations or equipment.

Where access is not provided for statutory gas safety checks, Brent Council will escalate the matter promptly and may take legal enforcement action to maintain continuous compliance with the annual LGSR requirement.

5.5 Contractors

All contractors must be demonstrably competent and comply with Brent Council's Gas Safety procedures and legal standards. Failure to do so may result in contract suspension, termination, or removal from the Council's approved supplier list.

6. Monitoring and Assurance

Compliance with this Policy will be monitored and verified through both ongoing performance tracking and periodic reviews. These reports enable senior management to review safety performance and address any areas of concern.

- Key performance indicators (KPIs) will be reported monthly to the Brent Housing Committee Board.
- Compliance performance will be measured across the entire housing stock, including void properties (properties that are temporarily unoccupied). To ensure full visibility of statutory safety compliance, risk exposure, and service performance.
- Audits will be conducted to provide assurance that the Council's Policies and Management Plans remain effective and compliant with current legislation and best practice.
- The Gas Safety Management Plan outlines in detail how compliance will be achieved and evidenced, including the use of our chosen compliance monitoring system (True Compliance). We will utilise such systems to maintain accurate records and produce management reports.
- A formal review of this policy will take place every 12 months, or sooner if legislation or best practice changes.

7. Communication

This policy will be published on Brent Council's website and made available to all relevant stakeholders, including residents, staff, and contractors. Brent Council will communicate with residents about safety in their buildings through appropriate channels.

Residents dissatisfied with how a gas safety inspection or repair has been managed may escalate concerns in line with the Brent Council Complaints Policy.

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London Borough of Brent

Water Safety Policy 2026- 2027

This policy sets out Brent Council's approach to managing water safety risks across its housing stock and premises. It establishes the responsibilities, controls and assurance arrangements required to protect residents, staff, contractors and others from water-related health and safety risks, including Legionella and scalding.

Owner:	Spencer Randolph, Director of Housing Services	
Approved by:	DMT/Board/Cabinet	Insert date in format dd/mm/yyyy
Review cycle: (years)	1	
Next review date:	dd/mm/yyyy	



Regulator:	<ul style="list-style-type: none"> • Health and Safety Executive (HSE) • Regulator of Social Housing (RSH) – Safety and Quality Standard • Building Safety Regulator (BSR)
Legislation:	<ul style="list-style-type: none"> • Health and Safety at Work etc. Act 1974 • Management of Health and Safety at Work Regulations 1999 • Control of Substances Hazardous to Health Regulations 2002 (COSHH) • Water Industry Act 1991 • Water Supply (Water Fittings) Regulations 1999 • Building Regulations 2010, where applicable • Housing Act 2004 and the Housing Health and Safety Rating System (HHSRS) • Building Safety Act 2022, where applicable to the Council's buildings and safety management arrangements • Health Protection (Notification) Regulations 2010
Codes of Practice:	<ul style="list-style-type: none"> • HSE Approved Code of Practice L8, Legionnaires' disease: The control of legionella bacteria in water systems • HSE HSG274 Part 2, The control of legionella bacteria in hot and cold-water systems • BS 8580-1, Water quality – Risk assessments for Legionella control • Relevant HSE guidance on the control of scalding and safe water temperatures
The policy also operates in the context of:	<ul style="list-style-type: none"> • Water Safety Management Plan • Building Safety Management System • Resident Engagement Strategy • Gas Safety Policy • Electrical Safety Policy • Lifts and Lifting Equipment Policy • Asbestos Policy • Health & Safety Policy • Complaints Policy • Repairs and Maintenance Policy • No Access Policy

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1. Purpose

The purpose of this policy is to set out Brent Council's commitment to managing water safety risks across its housing portfolio, and to demonstrate compliance with all relevant Water Safety legislation and standards. Our objective is to protect life, property, and the wider community through a robust safety culture embedded at every level of the organisation.

Water safety within Brent Council is managed through a structured, risk-assessment-led process. All relevant water systems are subject to a competent Legionella Risk Assessment (LRA), which establishes the baseline level of risk and the required control measures. Each LRA is supported by a documented desktop review at defined intervals to confirm that the assessment remains suitable and sufficient, proportionate to risk, and reflective of current system conditions.

2. Scope

This policy applies to:

- All residential properties owned or managed by Brent Council that contain water systems. Including general needs housing, supported and sheltered schemes, temporary accommodation, and houses in multiple occupation (HMOs).
- Communal water systems in mixed-tenure blocks where Brent Council retains responsibility for safety in common areas.
- All Brent Council staff, contractors, and partners involved in housing management, maintenance, or compliance services that could affect Building Safety.

Non-Housing corporate premises are covered under the Council's Corporate Health and Safety Policy.

3. Policy Statement

Brent Council recognises its duties under health and safety legislation to control the risks from waterborne hazards (such as Legionella bacteria) and hot water scalding in its housing properties. We are committed to safeguarding residents, staff, contractors, and the public from water that may be unsafe due to harmful bacteria, parasites, extreme temperatures, or other water quality issues.

Brent Council operates a two-stage assurance process for water safety risk management. This comprises the baseline Legionella Risk Assessment, followed by a formal desktop review of the existing assessment every two years. Desktop

reviews ensure that assessments remain valid between physical surveys and confirm whether a full re- assessment is required. Control measures are derived from, and remain aligned to, the findings of the most current valid risk assessment.

Our policy is to:

- **Comply Fully** with all relevant water safety legislation, regulations, and Approved Codes of Practice and to proactively adapt to new or emerging guidance on water hygiene and safety.
- **Prevent Waterborne Risks** by implementing robust risk assessments and control measures for Legionella and other water hazards in the design, construction, operation, and maintenance of our water systems.
- **Maintain Safe Water Systems Throughout the Lifecycle** of each building, ensuring that water safety is considered at every stage from design and installation through to occupation, ongoing maintenance, refurbishment, and decommissioning.
- **Ensure Competence and Accountability** by appointing appropriately qualified persons to oversee water safety, providing training to staff and contractors, and holding individuals accountable for their water safety responsibilities.
- **Engage Residents and Stakeholders** by communicating clearly about water safety measures in their homes and ensuring that vulnerable residents (who may be at greater risk of scalding or infection) receive appropriate consideration and protection.
- **Promote Continuous Improvement** by learning from incidents, audits, near-misses, and resident feedback to update our water safety practices and ensure they remain effective and up to date.

This policy reflects Brent Council's commitment to a proactive, risk-based, and transparent approach to Building Safety management across all its housing assets, in order to protect the health and wellbeing of residents and others.

3.1 Equality, Diversity and Inclusion

This policy embodies Brent Council's commitment to Equality, Diversity and Inclusion within our work and the services we provide. Please refer to our Equality, Diversity and Inclusion Strategy here: [brent-equity-diversity-and-inclusion-strategy-2024-28-digital-version-v2.pdf](#)

Brent Council will ensure that Water Safety measures consider the diverse needs of residents and staff, including those with disabilities, language barriers or additional vulnerabilities, in line with the Equality Act 2010.

4. Strategic Principles

Brent Council's approach to implementing this policy is guided by the following principles:

4.1 Lifecycle Water Safety Management

- Water safety will be embedded throughout each building's lifecycle, including during design and construction, during occupation (through effective maintenance and control measures), and through refurbishment to decommissioning.
- We will maintain accurate and up-to-date water system information to inform decision-making and ensure continuity of safety measures over the life of the building.
- All water safety data, schematics, and risk assessments form part of the Golden Thread under the Building Safety Act 2022.

4.2 Risk-Based and Proportionate Control

Brent Council applies a proportionate, risk-based approach to water safety management, in line with ACOP L8 and BS 8580-1.

- Proportionality is achieved by undertaking a full physical Legionella Risk Assessment where required, and by completing structured desktop reviews of existing assessments at defined intervals where system configuration, usage, and risk profile remain unchanged.
- Desktop reviews allow the Council to confirm the ongoing suitability and sufficiency of an existing assessment without unnecessary intrusion, while ensuring that full re-assessment is triggered promptly where changes, incidents, or control failures indicate increased risk.
- Resources and controls will be targeted according to factors like the design of the system, building occupancy (e.g. housing for elderly or vulnerable residents), and history of water quality issues.
- Control measures include temperature regimes, flushing, disinfection, sampling, and maintenance of thermostatic mixing valves (TMVs).

4.3 Governance and Accountability

- Clear lines of responsibility and robust governance arrangements will underpin water safety management. Brent Council will designate specific duty holders and responsible persons for water safety at strategic and operational levels.
- Water safety performance and compliance will be monitored through established governance structures, ensuring senior oversight and accountability for delivering this policy.

4.4 Competence and Training

- All staff and contractors involved in Water Safety will be suitably trained and

qualified. Competence will be maintained through ongoing professional development and independent verification where appropriate.

- All risk assessors and technicians will hold current City & Guilds, BOHS, or Water Management Society accredited training.

4.5 Resident Engagement and Inclusion

- Residents and leaseholders will receive a Water Safety leaflet at sign-up and following inspections, including information on safe use of showers and flushing outlets.
- Brent Council will provide residents with relevant information or instructions to help control water risks: for instance, guidance on cleaning shower heads, flushing infrequently used outlets after periods of non-use, or reporting any concerns.
- We will seek to engage residents through communications and, where appropriate, consultation on major works affecting water systems.
- Particular consideration will be given to residents who may be at higher risk from water hazards (for example, people who are at higher risk of scalding due to age or disability) to ensure suitable additional measures or adjustments are in place.

4.6 Monitoring, Audit and Continuous Improvement

- Water safety performance will be reviewed and verified through regular inspections, internal and external audits, and data analysis.
- Brent Council is committed to learning from any Building Safety incidents, audit findings, or near-misses, as well as updates in legislation or best practice, in order to continually improve our water safety management systems and procedures.
- Monitoring and audit arrangements include verification that Legionella Risk Assessments have been completed, recorded, and subject to timely desktop review, with outcomes documented and acted upon where re-assessment is required.

4.7 Open Safety Culture

- Brent Council will promote a just and open culture where employees, contractors, and residents can report safety concerns without fear of reprisal. All reports will be investigated, acted upon, and used to strengthen system-wide learning.

5. Governance and Accountability

Brent Council operates a clear governance framework that defines strategic accountability and operational responsibility for water safety across all housing assets. The structure ensures effective oversight, competent delivery, and

continuous improvement.

5.1 Duty Holder

The Chief Executive is the Council's Duty Holder for health and safety and retains ultimate accountability for water safety compliance. They ensure that appropriate arrangements, competent personnel, and sufficient financial and organisational resources are in place to manage risks associated with waterborne hazards such as Legionella.

This accountability is supported through the Council's governance framework, including the Brent Housing Committee Board, internal audit, and reports to the Cabinet and Audit & Assurance Committee.

5.2 Water Safety Management and Assurance

Strategic Responsible Person	Name	Spencer Randolph
	Position	Director Housing Services
	Email	spencer.randolph@brent.gov.uk
	Responsibilities	Holds overall strategic accountability for compliance with water safety legislation and standards. Approves the Water Safety Policy and Management Plan, secures resources, and ensures that water safety is integrated within the wider Building Safety and Asset Management Strategy. Champions a positive safety culture and ensures that performance and risks are reported to the Chief Executive and corporate governance boards.
Deputy Strategic Responsible Person	Name	Gary Mitchell
	Position	Head of Service Housing Management Property
	Email	gary.mitchell@brent.gov.uk
	Responsibilities	Supports and deputises for the Strategic Responsible Person. Coordinates the delivery of the water safety strategy across departments, ensuring collaboration between housing, asset management, and compliance teams. Monitors performance data, escalates significant risks, and ensures that water safety is given appropriate priority within service planning.
Local	Position	Strategic Compliance Manager

Responsible Person	Responsibilities	Provides assurance that operational arrangements for water safety are effective and compliant. Oversees the implementation of the Water Safety Management Plan, monitors contractor performance, and ensures that records, risk assessments, and statutory inspections are accurate and up to date. Acts as the principal contact for regulators, the Health and Safety Executive, and public health authorities.
Compliance Lead (Contract Manager)	Name	John Roche
	Position	Contract and Compliance Manager Mechanical
	Email	John.Roche1@brent.gov.uk
	Responsibilities	Acts as the Council's professional lead for Gas Safety compliance. Manages the delivery of testing, inspection, and remedial programmes, verifies contractor competence, and monitors KPIs and SLAs. Provides expert advice to the Local Responsible Person on technical standards, legislation, and best practice.

5.3 Employees

All employees must cooperate with the Council's water safety arrangements, follow safe systems of work, complete relevant training, and report hazards or defects promptly.

5.4 Residents and Leaseholders

Residents and leaseholders must cooperate with water safety requirements, allow access for inspections and sampling, and follow any guidance to prevent stagnation or scalding risks.

5.5 Contractors

All contractors must be competent in accordance with ACoP L8 and HSG 274, comply with Brent Council's procedures, and carry out works safely. Failure to do so may result in contract termination or removal from approved supplier lists.

6. Monitoring and Assurance

Compliance with this Policy will be monitored and verified through both ongoing performance tracking and periodic reviews. These reports enable senior management to review safety performance and address any areas of concern.

- Water safety performance reporting includes assurance on the completion

and timeliness of Legionella Risk Assessments and their associated desktop reviews, including confirmation of whether assessments remain valid or whether full re-assessment has been triggered.

- Key performance indicators (KPIs) will be reported monthly to the Brent Housing Committee Board.
- Audits will be conducted to provide assurance that the Council's Policies and Management Plans remain effective and compliant with current legislation and best practice.
- The Water Safety Management Plan outlines in detail how compliance will be achieved and evidenced, including the use of our chosen compliance monitoring system (True Compliance). We will utilise such systems to maintain accurate records and produce management reports.
- A formal review of this policy will take place every 12 months, or sooner if legislation or best practice changes.

7. Communication

This policy will be published on Brent Council's website and made available to all relevant stakeholders, including residents, staff, and contractors. Brent Council will communicate with residents about safety in their buildings through appropriate channels.

Residents who remain dissatisfied with any water safety issue response may escalate via the Brent Council Complaints Policy.

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London Borough of Brent

Mechanical & Electrical Services Policy 2026-2027

This policy sets out Brent Council's approach to managing mechanical and electrical services safely and in compliance with relevant requirements across its housing stock. It defines the responsibilities and controls for their safe operation, maintenance and management.

Owner:	Spencer Randolph, Director of Housing Services	
Approved by:	DMT/Board/Cabinet	Insert date in format dd/mm/yyyy
Review cycle: (years)	1	
Next review date:	dd/mm/yyyy	



Regulator:	<ul style="list-style-type: none"> • Health and Safety Executive (HSE) • Regulator of Social Housing (RSH) – Safety and Quality Standard • Building Safety Regulator (BSR)
Legislation:	<ul style="list-style-type: none"> • Health and Safety at Work etc. Act 1974 • Management of Health and Safety at Work Regulations 1999 • Electricity at Work Regulations 1989 • Provision and Use of Work Equipment Regulations 1998 • Lifting Operations and Lifting Equipment Regulations 1998 • Lifts Regulations 2016 • Construction (Design and Management) Regulations 2015, where applicable • Building Regulations 2010 • Building Safety Act 2022, where applicable • Regulatory Reform (Fire Safety) Order 2005, where applicable • Control of Substances Hazardous to Health Regulations 2002, where applicable • Pressure Systems Safety Regulations 2000, where applicable • Gas Safety (Installation and Use) Regulations 1998, where applicable
Codes of Practice:	<ul style="list-style-type: none"> • BS 7671 • Relevant HSE Approved Codes of Practice and guidance
The policy also operates in the context of:	<ul style="list-style-type: none"> • M&E Management Plan • Building Safety Management System • Resident Engagement Strategy • Fire Policy • Gas Safety Policy • Electrical Safety Policy • Asbestos Policy • Water Safety Policy • Health & Safety Policy • Complaints Policy • Repairs and Maintenance Policy • No Access Policy • Mobility Scooter (Including e-Bike and e-scooter) Policy

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1. Purpose

The purpose of this policy is to set out Brent Council's commitment to the safe and compliant management of all Mechanical and Electrical (M&E) systems across its housing portfolio.

It ensures compliance with all relevant statutory regulations and industry standards, protecting residents, staff, contractors, and visitors from harm arising from the failure, misuse, or deterioration of mechanical and electrical systems.

This policy underpins the Council's responsibilities under the Building Safety and Health and Safety frameworks, ensuring systems are safe by design, installation, operation, maintenance, and decommissioning.

2. Scope

This policy applies to:

- All residential properties owned or managed by Brent Council, including general-needs housing, supported and sheltered schemes, temporary accommodation and houses in multiple occupation (HMOs).
- All communal areas, plant rooms, risers, and system interfaces under Brent Council's control.
- All Brent Council staff, contractors and partners involved in housing management, maintenance, asset management or compliance functions that affect the condition of dwellings.

This includes, but is not limited to:

- Passenger lifts, through-floor lifts, and stairlifts.
- Door entry and access control systems.
- CCTV and communal telecare systems.
- Ventilation, heating, and mechanical plant systems.
- Solar photovoltaic systems (PV).
- Associated control panels, cabling, and safety interlocks.
- Air Source Heat Pumps (ASHPs).
- Oil-Fired Boilers and Storage Systems.

Non-Housing corporate premises or assets are covered under the Council's Corporate Health and Safety Policy.

3. Policy Statement

Brent Council recognises that robust mechanical and electrical safety management is vital to ensure the safety of residents, maintain statutory compliance, and preserve the integrity of its building assets.

Our policy is to:

- **Comply Fully** with all legislation, codes of practice, and standards governing M&E systems, e.g. LOLER, PUWER, Electricity at Work Regulations 1989, and Building Regulations.
- **Ensure Systems are Safe** by design, installation, use, maintenance, and inspection throughout their lifecycle.
- **Implement a Risk Based Approach** to identify, prioritise, and mitigate hazards associated with lifts, electrical plant, and mechanical equipment.
- **Ensure Competence** by employing or contracting appropriately qualified engineers and technicians who meet statutory competence requirements.
- **Maintain Accurate Records** through the Council's compliance and repairs management system (True Compliance and NEC), supporting the "Golden Thread" of building information.
- **Engage Residents** through clear communication, accessible information, and consultation on building safety improvements.
- **Drive Continuous Improvement** through audits, training, and lessons learned from incidents, complaints, or enforcement activity.

This policy supports Brent Council's overarching goal of maintaining safe, decent, and sustainable homes in line with the Building Safety Act 2022 and the Decent Homes Standard.

3.1 Equality, Diversity and Inclusion

This policy embodies Brent Council's commitment to Equality, Diversity and Inclusion within our work and the services we provide. Please refer to our Equality, Diversity and Inclusion Strategy here: [brent-equity-diversity-and-inclusion-strategy-2024-28-digital-version-v2.pdf](#)

Brent Council will ensure that M&E compliance measures consider the diverse needs of residents and staff, including those with disabilities, language barriers or additional vulnerabilities, in line with the Equality Act 2010.

4. Strategic Principles

Brent Council's approach to implementing this policy is guided by the following principles:

4.1 Lifecycle M&E Management

- M&E safety will be integrated into every stage of the building lifecycle. From design, procurement, and installation to operation, inspection, maintenance, and decommissioning.
- All system information, testing records, and asset data will form part of the building's Golden Thread.

4.2 Risk-Based and Proportionate Control

- Brent Council will apply a proportionate, risk-based approach to M&E safety. High-risk systems (such as lifts) will be prioritised for inspection and monitoring in line with statutory and best-practice interval.

4.3 Governance and Accountability

- Clear lines of accountability underpin effective M&E safety management.
- All responsible persons have defined duties, supported by the Brent Housing Committee Board and Audit & Assurance Committee, ensuring transparent oversight and assurance.

4.4 Competence and Training

- All staff and contractors involved in M&E Safety will be suitably trained and qualified. Competence will be maintained through ongoing professional development and independent verification where appropriate.

4.5 Resident Engagement and Inclusion

- Residents and leaseholders will be kept informed about safety relating to M&E system arrangements in their homes and buildings.
- Brent Council will provide residents with relevant information or instructions to help control electrical risks.
- We will seek to engage residents through communications and, where appropriate, consultation on major works affecting electrical supply systems.
- Particular consideration will be given to residents who may be at higher risk to ensure suitable additional measures or adjustments are in place.

4.6 Monitoring, Audit and Continuous Improvement

- M&E safety performance will be reviewed and verified through regular inspections, internal and external audits, and data analysis.
- Brent Council is committed to learning from any Building Safety incidents, audit findings, or near-misses, as well as updates in legislation or best practice, in order to continually improve our safety management systems and procedures.

4.7 Open Safety Culture

- Brent Council will promote a just and open culture where employees, contractors, and residents can report safety concerns without fear of reprisal. All reports will be investigated, acted upon, and used to strengthen system-wide learning.

5. Governance and Accountability

Brent Council operates a clear governance framework that defines strategic accountability and operational responsibility for safe management of mechanical and electrical systems across all housing assets. The structure ensures effective oversight, competent delivery, and continuous improvement.

5.1 Duty Holder

The Chief Executive is the Council's Duty Holder for health and safety and retains ultimate accountability for compliance with M&E regulations, legislation and standards. They ensure that appropriate arrangements, competent personnel, and sufficient financial and organisational resources are in place to manage associated risks.

This accountability is supported through the Council's governance framework, including the Brent Housing Committee Board, internal audit, and reports to the Cabinet and Audit & Assurance Committee.

5.2 M&E Management and Assurance

Strategic Responsible Person	Name	Spencer Randolph
	Position	Director Housing Services
	Email	spencer.randolph@brent.gov.uk
	Responsibilities	Holds overall strategic accountability for M&E compliance. Approves the M&E Policy and Management Plan, secures resources, and ensures that M&E Safety is integrated within the wider Building Safety and Asset Management Strategy. Champions a positive safety culture and ensures that performance and risks are reported to the Chief Executive and corporate governance boards.
Deputy Strategic Responsible	Name	Gary Mitchell
	Position	Head of Service Housing Management Property
	Email	gary.mitchell@brent.gov.uk

Person	Responsibilities	Supports and deputises for the Strategic Responsible Person. Coordinates the delivery of the M&E strategy across departments, ensuring collaboration between housing, asset management, and compliance teams. Monitors performance data, escalates significant risks, and ensures that M&E compliance is given appropriate priority within service planning.
Local Responsible Person	Position	Strategic Compliance Manager
	Responsibilities	Provides assurance that operational arrangements for M&E compliance are effective and compliant. Oversees the implementation of the M&E Management Plan, monitors contractor performance, and ensures that records, certificates, and statutory inspections are accurate and up to date. Acts as the principal contact for regulators, auditors, and certification bodies.
Compliance Lead (Contract Manager)	Name	John Roche
	Position	Contract and Compliance Manager Mechanical
	Email	John.Roche1@brent.gov.uk
	Responsibilities	Acts as the Council's professional lead for M&E compliance. Manages the delivery of testing, inspection, and remedial programmes, verifies contractor competence, and monitors KPIs and SLAs. Provides expert advice to the Local Responsible Person on technical standards, legislation, and best practice.

5.3 Employees

All employees must cooperate with the Council's M&E compliance safety arrangements, follow safe systems of work, complete relevant training, and report hazards or defects promptly.

5.4 Residents and Leaseholders

Residents and leaseholders must allow reasonable access for inspection and remediation works, report issues without delay and follow any safety guidance provided by the Council.

5.5 Contractors

All relevant contractors must demonstrate competence, comply with Brent Council procedures and meet legislative standards. Contractors should maintain records on the Council's chosen system(s) without delay. Failure to do so may result in contract termination or removal from approved lists.

6. Monitoring and Assurance

Compliance with this Policy will be monitored and verified through both ongoing performance tracking and periodic reviews. These reports enable senior management to review safety performance and address any areas of concern.

- Key performance indicators (KPIs) will be reported monthly to the Brent Housing Committee Board.
- Audits will be conducted to provide assurance that the Council's Policies and Management Plans remain effective and compliant with current legislation and best practice.
- The M&E Management Plan outlines in detail how compliance will be achieved and evidenced, including the use of our chosen compliance monitoring system (True Compliance). We will utilise such systems to maintain accurate records and produce management reports.
- A formal review of this policy will take place every 12 months, or sooner if legislation or best practice changes.

7. Communication

This policy will be published on Brent Council's website and made available to all relevant stakeholders, including residents, staff, and contractors. Brent Council will communicate with residents about safety in their buildings through appropriate channels.

Residents who remain dissatisfied with any mechanical or electrical safety issue response may follow the Brent Council Complaints Policy.

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Keeping you safe in your home

A building safety guide for residents

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What is building safety?

The safety of the homes we manage and people who live in them is a priority for the housing management service at Brent Council. We deliver a programme of regular safety and compliance checks in homes and shared spaces of blocks and estates, which means we can find and fix any safety risks quickly.

Building safety includes:

- Preventing and managing the risk of fire;
- Checking and maintaining gas appliances;
- Installing and inspecting electrical wiring;
- Identifying and removing harmful asbestos if needed;
- Reducing the risk of unsafe water causing diseases like Legionnaires; and
- Making sure lifts in shared areas are working properly.

We take safety concerns from tenants and leaseholders seriously and follow these up with checks and fixes as needed. We also expect tenants and leaseholders to take responsibility for helping us to keep their home, and areas around their home, safe.

This policy explains the work we do and what's expected of you as tenants and leaseholders to keep your homes and the buildings you live in safe.

Building safety engagement

Understanding the needs of tenants living in our high-risk buildings

The Building Safety Act 2022 defines a building as high-risk if:

- It is at least 18 metres tall **or** has 7 or more floors; and
- Contains at least two residential dwellings.

It's important for us to know who lives in the homes we manage, especially in our high-risk buildings, so we can support people who might need help to evacuate in an emergency.

To do this, we:

- Collect information about the needs of new tenants and their household when they move in to one of our high-risk buildings; and
- Contact tenants living in our high-risk buildings once a year to check and update household information.

There are secure information boxes stored in all our high-risk buildings, as well as some others. These boxes hold things like floorplans, flat numbers and information about people who might need help to leave the building in an emergency. Only our housing teams and emergency services, like the London Fire Brigade, can access these boxes.

How we share building safety information with you

We want you to feel safe in your home and it's important that you have access to the right information to help you feel that way.

To keep you informed about safety in your home and building, we:

- Give building safety information to new tenants when they move in;
- Provide you with updated safety certificates for your home when needed;
- Share safety details on our website and safety reminders in our e-newsletter;
- Post safety information and evacuation plans on noticeboards and in shared spaces.

If you live in a high-risk building, we will hold a meeting once a year to:

- Tell you about the safety checks we've done in your building;
- Talk about any problems we found and what has been done to fix them;
- Remind you of your responsibilities to help keep the building safe; and
- Give you a chance to share your thoughts or concerns about building safety.

If you can't make it to the meeting, we will also share this information with you by email or post.

How you can talk to us about safety in your home or building

You can talk to us anytime if you have worries about safety in your home or building by:

- Calling us on 020 8937 2400 to report a health and safety repair
- Emailing us at BHMBuildingSafety@Brent.gov.uk; or
- Speaking to your Area Tenancy Manager or any other Brent Council housing management staff member when you see them out and about in your neighbourhood.

We will also pro-actively engage with you on any changes that impact building safety in your home or shared spaces, including:

- Any major repair work to the building or shared spaces, including the materials being used;
- Changes to policies that impact building safety; and
- How we should listen and talk to you about building safety.

Fire safety

Fire safety in shared spaces

We carry out fire risk assessments (FRA's) for all buildings we manage that have shared spaces e.g. hallways or landings. Fire risk assessments are done by an experienced, qualified specialist and will include things like:

- Looking for possible fire hazards in shared spaces, on balconies or on the outside of the building;
- Checking if alarms and firefighting equipment are available where needed; and
- Checking for fire safety and evacuation information signs in shared spaces.

A completed FRA report provides us with a set of recommendations for preventing and reducing the risk of fire and we then action these recommendations based on the level of risk identified. We aim to complete actions in line with the timeframes below:

Risk level	Timeframe
Intolerable	Immediately

High	3 months
Medium	6 months
Low	1 year

FRA's are renewed on a rolling basis, as follows:

Building type	Frequency of FRA
High-risk blocks and supported living accommodation	Annual
Gypsy and traveller sites	Annual
All other blocks with a common area	Every 3 years

If you would like to see a copy of the most recent fire risk assessment for your building, you can email us at BHMBuildingSafety@brent.gov.uk.

Keeping shared spaces clear and safe

Keeping shared spaces clear of any obstructions is important for reducing the risk of fire and for safe evacuation in the event of an emergency.

All shared spaces in Brent Council blocks (including hallways, landings, stairwells, caretaking cupboards, bin stores and any communal balcony areas) should always be kept clear of personal items (including bicycles, scooters, pushchairs, doormats, plants or picture frames etc) and rubbish.

We take a zero-tolerance approach to items being stored or left in shared spaces, even temporarily. If we find an item left in a shared space, we reserve the right to remove the item and charge you for its removal, storage or disposal as appropriate. If we notice a resident who is continuously leaving items in shared spaces, we will take enforcement action against them as a breach of their tenancy or lease. It is a risk to the safety of you and all residents in your block to store items or use sockets in communal areas to charge electrical items or vehicles (e.g. e-scooters).

You must dispose of any household waste in the allocated bin areas. Bulky items should be disposed of through the Council's [bulky waste collection service](#) or through an alternative private waste collection contractor of your choice. If you leave bulky waste in a shared space then this is classed as fly-tipping and enforcement action will be taken.

Fire safety in your home

We install, test and replace, when broken, smoke alarms in all homes we manage where required, but maintaining fire safety inside your home is your responsibility.

It is important that you test the smoke detectors in your home on a monthly basis and let us know if they aren't working.

The London Fire Brigade share [lots of useful information about how you can keep your home safe from fire](#) and we recommend our tenants and leaseholders follow their guidelines.

Fire door inspections

Fire doors are an important part of preventing or slowing down the spread of smoke, heat and fire in an emergency, so we need to make sure that they aren't damaged and are working as they should be. We carry out a programme of fire door inspections and maintenance to all buildings over 11 metres in height and supported living accommodation, as follows:

Type of door	Frequency of inspection
Communal door in a shared space	Every 3 months
Individual flat entrance door that opens into an internal shared space	Annual

Evacuation plans

We operate various approaches to evacuation across the buildings we own and manage. These are:

- **Stay put** – stay in your home unless directly affected by fire, smoke or told to leave
- **Simultaneous evacuation** – everyone leaves the building at the same time when an alarm sounds or they are instructed to do so
- **Phased evacuation** – people leave in stages, following alarms or instructions
- **Progressive evacuation** – people move to a safer area inside the building first before evacuating further

We'll make it clear to you which evacuation plan is in place when you first move into your home and if there are any changes to this, we'll write to you and let you know. If you have any questions about the evacuation plan in place for your block, you can email BHMBuildingSafety@brent.gov.uk or speak to your Area Tenancy Manager.

Whatever evacuation plan is in place for your block, if there is fire or smoke inside your home, you should always leave and contact emergency services immediately.

Supporting people who need help to evacuate in an emergency

If you live in one of our high-risk buildings and would need help to get out of the building in an emergency (e.g. you have a disability which affects your mobility or you are visually impaired), we will work with you to develop a personal emergency evacuation plan. You will get a copy of this, and a copy will also be stored in a secure information box within your building that emergency services can access during an evacuation.

If you think you might need a personal evacuation plan, please speak to your area tenancy manager or email BHMBuildingSafety@brent.gov.uk.

Gas safety

Gas safety in your home

Your home will receive a gas safety check at least once every 12 months, based on the date of the most recent landlord gas safety record (LGSR). A gas safety check will mean a qualified Gas Safe engineer will visit your home and:

- Check that any gas appliances, fittings and flues are working properly;
- Remove any open flue gas appliances found in rooms being used as bedrooms;
- Test, and replace if needed, any smoke alarms;
- Install, test, and replace if needed, a carbon monoxide detector; and
- Do a visual inspection of the gas cooker and disconnect it if it is faulty or unsafe.

Following your annual gas safety check, we will provide you with a copy of the updated LGSR, which is proof that your gas system has been checked by a qualified engineer and is working properly. If we are carrying out a gas safety check that is relevant for more than one home, we will provide a copy of the LGSR in a shared space.

We encourage all residents to test carbon monoxide detectors, alongside smoke alarms, monthly. If there is an issue with either alarm please contact us.

We will carry out a gas safety check following any repair or refurbishment work we do in your home where the work may have affected gas fittings, appliances or flues and provide you with an updated LGSR.

We do not provide gas safety checks inside leaseholder homes. Leaseholders should make sure they are scheduling appropriate gas safety checks for any gas appliances, fittings and flues in their home.

What to do if you smell gas or suspect a leak

If you smell or suspect a leak call the National Gas Emergency Service on 0800 111 999, turn off the gas supply if safe to do so, open windows/doors, do not use naked flames or electrical switches, and leave the property.

Gas safety in empty properties

If a property is empty because it has been newly built or because a tenant has recently moved out, we will cap off and prevent gas supply to that property until a tenant moves in. When we re-instate gas supply to the property, a gas safety check will take place and an updated LGSR will be shared with the new tenant.

If you move home through a transfer or mutual exchange, we will also carry out a gas safety check as part of the moving process and provide the incoming tenant with an updated LGSR.

Solid fuel appliances

We do not permit tenants to install solid fuel appliances (any heater that uses wood, wood pellets, coal etc. as fuel) in their homes and will reject any requests to install them.

If we come across a solid fuel appliance that has been installed, we will work with the tenant to arrange its removal. If a property becomes empty and we find a solid fuel appliance in place, we will remove it before re-letting the property.

How we manage homes that aren't using a gas supply

If gas can be supplied to your home, but you have chosen not to use gas **capped**, then we will still visit you at least every 12 months to check that the supply has not been reconnected and that the condition of the property, as well as your health and wellbeing, is not being negatively affected by the lack of gas heating.

Electrical safety

Electrical safety in your home

Your home will receive an electrical safety inspection at least once every 5 years, based on the date of the most recent electrical installation condition report (EICR). An electrical safety inspection will mean a qualified electrical engineer will visit your home and:

- Do a visual assessment of switches, sockets, power outlets, light fittings and the main fuse board to identify damage or faults that could be a safety risk;
- Carry out tests to the electrics in your home (they might need to turn the power in your home off for a short period of time to do this); and
- Check that protection and prevention against fire hazards and electric shocks (earthing and bonding) is in place and working properly.

We will do an electrical safety inspection following any repairs or refurbishment work we do in your home where the work may have affected the electrical installation.

Electrical safety in empty properties

When a property becomes empty because a tenant has moved out, a power supply will still be needed so we can carry out repair and refurbishment work to get the property ready to re-let. During this work while the property is empty, we will carry out an electrical safety inspection and an updated EICR will be shared with the new tenant when they move in.

We will also carry out electrical safety inspections as part of a transfer or mutual exchange and provide the new tenant with an updated EICR.

Electrical safety in shared spaces

We make sure that electrics in shared spaces within the buildings we manage are well maintained and working properly. To do this we carry out routine tests to electrical fittings in shared spaces as follows:

Compliance Area	Frequency
Communal Electric	5 yearly
Emergency lighting	Annually
Electric powered gates	6-monthly
Lightning protection systems	Annually
Fire Alarms	6-monthly

Any equipment owned and used by Brent Council employees in shared spaces e.g. by our caretaking staff is also checked once a year to make sure it is safe and working properly.

Our communal electrical sockets are locked so they cannot be used by residents and cause potential risk of fire. You must not use electrical outlets in the shared spaces of your building, this includes for charging electric scooters or mobility vehicles.

Asbestos safety

What is asbestos?

Asbestos is a naturally occurring material that is found in rocks around the world. It is strong and heat resistant, and so was used in the construction of homes and other buildings before it was banned in the United Kingdom in 1999. Asbestos can be found in multiple places around older homes e.g. under floor tiles, around water tanks or as part of insulation.

Asbestos is not a danger to your health if it is in good condition and left undisturbed. Worn or damaged asbestos may release fibres into the air which can cause damage to your lungs if you breathe them in.

How we identify asbestos

We identify asbestos through either:

- An **asbestos management survey** which provides basic information about the location, amount and condition of asbestos across a whole property; or
- A **refurbishment and demolition survey** which is carried out before any refurbishment or major repair work to a property and provides full detail of any asbestos within the specific area being worked on.

We have carried out asbestos management surveys for all shared spaces in Brent Council owned blocks. Where asbestos has been identified in shared spaces, this is re-inspected on either an annual or two-yearly basis depending on the risk priority given in the survey report.

We carry out asbestos management surveys to all individual properties when they become empty (unless an existing asbestos survey is already available). This means we can identify any asbestos in homes so it can be monitored, and the new tenant can be informed.

How we manage asbestos

Our policy is to leave materials containing asbestos in place whilst they remain in good condition and are not likely to be disturbed as, in these circumstances, they do not present a health and safety risk.

If we become aware of asbestos that has been damaged or disturbed, we will remove it.

We keep a register of the location, condition, extent and nature of any confirmed or presumed asbestos across the homes and buildings we manage. This is available to our staff and contractors so it can be checked before any repair or refurbishment works happen on a property, and the appropriate safety measures and/or removal of asbestos can be arranged.

Water safety

Water safety and legionnaires disease

Legionnaires disease is a type of pneumonia caused by bacteria (*Legionella*) which can live in water. If water storage systems aren't cleaned or maintained properly then this can

increase the risk of this bacteria developing and people becoming ill if they come into contact with it.

However, with some simple safety checks and ongoing maintenance, the risk of legionnaires is very low.

How we identify and manage risks to water safety

We have risk assessments in place for all our blocks, and these are reviewed based on risk. A new risk assessment will be completed on a high-risk block on a risk based frequency or when there have been material changes to the block that might have impacted the water storage system.

The risk assessment will set out a hygiene strategy such as tank cleaning, servicing arrangements and flushing regimes.

Inspections will generally include one or more of the following activities:

- Checking the cleanliness of the tank;
- Making sure any pipes and valves are in good working order;
- Making sure risks of contamination are being reduced by a well-fitting lid and insect screen;
- A temperature check (hot water should reach 50°C after one minute and cold water should be 20°C or under within two minutes);
- Water sampling.

We do not regularly inspect water storage systems inside individual homes. General water safety within individual homes is the responsibility of the tenant or leaseholder who lives there. See the tenant and leaseholder responsibility section of this policy for what you need to do to help maintain water safety in your home.

Water safety in empty properties

Where a property is empty because a tenant has recently moved out, weekly flushing will take place to ensure water safety is maintained. Where refurbishment work required to the property means that it will be empty for more than one month, we will drain down any water storage system. Checks carried out to empty properties before a tenant moves in will also include cleaning of water tanks, as well as making sure it has a lid and is properly supported.

Refurbishment work to empty properties will include the replacement of water storage systems with a combination boiler where possible.

What happens if we identify legionella bacteria?

If legionella bacteria is identified or an outbreak of legionnaires disease happens in your home or building, we will let you know straight away. We will also notify the Council's Health and Safety Manager.

The affected water storage system will be drained, cleaned and disinfected. The water will be tested again before the system is brought back in to use.

If needed, we can support you to move into alternative accommodation on a temporary basis whilst the work is carried out.

Lift safety

We make sure that the passenger lifts in the buildings we own and manage, as well as domestic lifts and personal lifting equipment e.g. stair lifts and hoists etc in homes, are well-maintained and working properly through a programme of inspections as follows:

Lift type	Inspection and servicing programme
Passenger lifts in shared spaces	Monthly service 6-monthly LOLER inspection
Domestic lifts and personal lifting equipment e.g. stairlifts, hoists etc.	6-monthly service

Any lift found to be faulty or unsafe will be taken out of service immediately until it is repaired.

Tenant and leaseholder responsibilities

It's important that you, as a tenant or leaseholder, take responsibility for helping us to keep your home and areas around your home as safe as possible. To do this, you:

- **Must** allow access to your home for servicing and safety checks when needed (we will take legal action if we are unable to access);
- **Must** report repairs and safety concerns in your home or a shared space to us as soon as possible and/or notify emergency services if it is an emergency;
- **Must** request permission before making any major improvements or alterations to your home (tenants only);
- **Must not** store, use or create any materials that can burn or cause explosion in your home, on a balcony or in any shared space.
- **Must not** leave or store items (including, but not limited to: pushchairs, mobility scooters, plants, clothes drying facilities, rubbish, etc.) in shared spaces.
- **Must not** lock, fasten or block an emergency door;
- **Must not** use electrical outlets in shared spaces (including for the charging of electrical bikes and scooters or batteries);
- **Must not** make any changes to shared spaces in their buildings e.g. painting or other decoration;
- **Must** let us know about any changes to your, or anyone in your households, needs (including if anyone requires medical oxygen) which mean they might need help to evacuate the building in an emergency
- **Must** make sure to run water through taps and showerheads in your home when you come back from being away from your home for several days.

Staff training

All housing management service staff who spend time out and about on estates or in tenants' homes receive building safety awareness training. This provides them with an overview of building safety legislation and equips them with the skills and knowledge to identify and properly manage or report any safety concerns they come across.

Council staff responsible for building safety

Chief Executive of Brent Council

Duty holder with overall accountability for building safety in Council homes.

Director of Housing Services

Delegated duty holder and responsible for making sure that building safety is appropriately resourced in budgets submitted for full Council approval.

Head of Property Services

Responsible for overseeing the implementation and effective delivery of the building safety policy, as well as the ongoing monitoring of our approach to building safety and making sure non-compliance is reported to the Councils' corporate management team as needed.

Strategic Compliance Manager

The health and safety lead as defined under the Social Housing (Regulations) Act 2023 and responsible person, as defined in the Regulatory Reform (Fire Safety) Order 2005 and extended through the Fire Safety (England) Regulations 2022 and the Building Safety Act 2022. Responsible for the operational delivery of, and adherence to, the building safety policy and raising any concerns or issues in doing this to the Head of Property Services.

Data storage and information sharing

A 'golden thread' of information

The Building Safety Act 2022 requires us to keep a 'golden thread' of information for each of our high-risk buildings. This means that we hold a digital record of important building information, starting from the design of the building before it is built, throughout construction and right through to the ongoing repair and maintenance of the building.

Sharing information with the Building Safety Regulator

We have registered all our existing high-risk buildings with the Building Safety Regulator and do this for any new developments that are covered by the 'high-risk' definition.

We submit building safety case reports to the Regulator when requested as part of the Building Assessment Certification application. Building safety cases include information about risks identified and how we manage them, plans in place for emergency evacuations and details of any structural work due to take place that might impact building safety. If you live in one of our high-risk block and would like to see a copy of the building safety case report for your building, you can email BHMBuildingSafety@brent.gov.uk.

We also report any safety incidents or problems in the high-risk buildings we manage to the Building Safety Regulator within 10 calendar days of the issue being identified. This is called Mandatory Occurrence Reporting (MOR). Issues we report will involve, or create a risk of,

structural failure of the building or the spread of fire or smoke which could lead to injury or death to a significant number of people. This makes sure that we are investigating and resolving any safety issues we find properly and also means that the Building Safety Regulator can check we have done what we should, and do their own investigation if they feel it's necessary.

Sharing information with the London Fire Brigade

We have registered all of our high-risk buildings on the London Fire Brigade (LFB) portal. We share information with the LFB about building orientation plans, floor layouts, the locations of lifts, electrical intakes, information boxes, fire hydrants and any other important details that support effective fire safety and will help them to act quickly and efficiently in the event of an emergency in one of our blocks.

We also update information on the LFB portal if there are any building faults that might impact fire safety, or the safe evacuation of residents in the event of an emergency, if the fault cannot be fixed within 24 hours.

Information concerning residents who may need assistance during the event of a fire is also shared. This is so they can support the evacuation of some residents if required.

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EQUALITY IMPACT ASSESSMENT (EIA)

POLICY/PROPOSAL:	Building Safety Compliance Policies (Fire Safety, Gas Safety, Mechanical & Electrical Services, Asbestos and Water Safety)
DEPARTMENT:	Resident and housing Services
TEAM:	Property Services (Compliance)
LEAD OFFICER:	Rheanna Swan
DATE:	04 September 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 building safety policies outline the Council's approach to safe and compliant management of Fire, Gas, Water, Asbestos and Mechanical & Electrical services to ensure resident safety in their homes. The policies form the Council's wider Building Safety Strategy and demonstrate compliance with Building Safety and Health & Safety obligations.

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

The policies have been developed to ensure and improve resident safety. However, some protected characteristic groups need extra consideration to ensure they are not negatively impacted when implementing the policies, such as those who may struggle with evacuations, providing property access and understanding safety information.

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		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.

As part of the policy making process, the council undertook consultation with Brent residents, through the Council's 'Have Your Say' consultation page, to understand if any part of the policies needed to be improved or made clearer. The consultation period ran from 21st April 2026 until 31st May 2026.

Feedback from the consultation highlighted some concerns that the policies had been written with technical terminology that the residents found difficult to understand. To help mitigate this, the service has created a reader-friendly Building Safety Tenant Guide to sit alongside the policies.

The data the Council holds on the protected characteristics of its tenants currently has significant gaps; however, the Quality Assurance & Standards and Resident Data Teams are working to improve EDI data collection in Housing Services.

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.
<p>The policies are expected to have a positive impact across all groups as they are designed to protect resident safety in their homes.</p> <p>More elderly residents may be affected by procedures such as evacuations and providing access to the property for assessments/ inspections. However, this would be managed through Personal Emergency Evacuation Plans (PEEPs) and risk assessments carried out.</p>	<p>2021 Census: data and resources Brent Open Data</p>

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

The policies are expected to have a positive impact across all groups as they are designed to protect resident safety in their homes.	2021 Census: data and resources Brent Open Data
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Disability	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<p>The policies are expected to have a positive impact across all groups as they are designed to protect resident safety in their homes.</p> <p>Residents with disabilities could be affected by procedures such as evacuations and providing access to the property for assessments/ inspections. However, this would be managed through Personal Emergency Evacuation Plans (PEEPs) and risk assessments carried out.</p>	2021 Census: data and resources Brent Open Data

Gender Reassignment	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policies are expected to have a positive impact across all groups as they are designed to protect resident safety in their homes.	2021 Census: data and resources Brent Open Data

Marriage and Civil Partnership	
	Provide supporting data and evidence.
The policies are expected to have a positive impact across all groups as they are designed to protect resident safety in their homes.	2021 Census: data and resources Brent Open Data

Pregnancy and Maternity

Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policies are expected to have a positive impact across all groups as they are designed to protect resident safety in their homes.	2021 Census: data and resources Brent Open Data

Race and Ethnicity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<p>Brent is a very diverse borough and for many residents English is not the main language used at home. In these circumstances they may struggle to understand the policies, creating a negative impact.</p> <p>A tenant guide to building safety has been created to sit alongside the policies to make the information more reader friendly and less technical. However, further consideration will be necessary around making the policies and guide accessible in alternative languages before this impact can be reduced.</p>	2021 Census - Ethnicity topic report

Religion or Belief	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policies are expected to have a positive impact across all groups as they are designed to protect resident safety in their homes.	2021 Census: data and resources Brent Open Data

Sex	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policies are expected to have a positive impact across all groups as they are designed to protect resident safety in their homes.	2021 Census: data and resources Brent Open Data

Sexual Orientation	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policies are expected to have a positive impact across all groups as they are designed to protect resident safety in their homes.	2021 Census: data and resources Brent Open Data

Socio-Economic Status	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policies are expected to have a positive impact across all groups as they are designed to protect resident safety in their homes.	2021 Census: data and resources Brent Open Data

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

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 council undertook consultation with Brent residents, through the Council's 'Have Your Say' consultation page, to understand if any parts of the policy need to be improved or made clearer. The consultation period ran from 21 st April 2026 until 31 st May 2026.

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.

The assessment concludes that the draft Fire, Gas, Electrical, Water and Asbestos Safety Policies are intended to improve the safety of all residents and are therefore expected to have an overall positive impact across the protected characteristic groups. Where there may have been potential negative impact for residents who are elderly or disabled around procedures such as evacuations and inspections, these have been considered in the policies and measures to manage these are in place.

The service has created a Building Safety Tenant Guide, as a more reader friendly document for tenants, to mitigate any concern of the language used in the policies being too technical, as raised during consultation.

As noted, the policies could negatively impact those residents whose main language is not English. This impact can be reduced through improving accessibility and offering alternative languages when implementing the policies and building safety guide.

SECTION D - RESULT

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

SECTION E - ACTION PLAN 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
Limited EDI data held on tenants within the Housing Service, making it harder to identify and evidence protected characteristics.	Workstreams are in progress within the QA Team and Resident Data Team to improve collection of this data.	Rheanna Swan	On-going, completion date not yet known	Started
Policies and building safety tenant guide may not be accessible to those residents where English is not their main language.	Need to look into making policies more accessible in alternative languages.	Engagement Team	When policies are implemented	Not started

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

The impact of the Building Safety Compliance Policies will be monitored through regular reviewing of compliance performance, PEEPs, risk assessments, cases of no access for inspections and resident feedback received through engagement. Accessibility of the policies will also be monitored and improved where necessary.

The ongoing improvements to our EDI data collection will also strengthen the Councils ability to identify and monitor vulnerabilities, as well as enhancing data held on protected characteristics across the housing service.

The policies will be formally reviewed on a regular basis, or sooner where legislative, regulatory, operational or equality considerations indicate changes are required.

SECTION F – SIGN OFF

	Signature	Date
Officer:	Rheanna Swan	04 September 2026

Reviewing Officer or Head of Service	Jodi Cooper	10 September 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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Vulnerabilities and Reasonable Adjustments Policy Appendices

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London Borough of Brent

Vulnerable Residents and Reasonable Adjustments Policy

This policy sets out the Council's approach to ensuring that residents with vulnerabilities receive fair, equitable, and accessible housing services.

Owner:	Spencer Randolph, Director Housing Services	
Approved by:	Cabinet	12/10/2026
Review cycle: (years)	2 years	
Next review date:	12/10/2028	

Regulator:	Equality Act 2010 Housing Ombudsman's Complaint Handling Code. Housing Ombudsman Spotlight Reports relating to vulnerability and communication. Care Act 2014 Human Rights Act 1998 Homelessness Reduction Act 2017 Heat Network (Market Framework) Regulations and associated consumer protection requirements, including responsibilities toward vulnerable heat network customers.
Legislation:	The Building Safety Act 2022 Fire Safety Act 2023
Codes of Practice:	The Regulator's Consumer Standards Code of Practice
The policy also operates in the context of:	Policies across Housing Services

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1. Introduction

This policy sets out the Council's approach to ensuring that residents with vulnerabilities receive fair, equitable, and accessible housing services. Our commitment is rooted in recognising that vulnerability can affect how individuals

engage with housing processes, understand information, report repairs, and sustain their accommodation.

We acknowledge that many residents face complex and intersecting challenges: disability, long-term health conditions, mental ill-health, trauma, language and literacy barriers, digital exclusion, domestic abuse, financial hardship, or the instability associated with temporary accommodation. These factors can significantly impact their ability to interact with our services in ways that standard procedures may not fully support. In line with best practice across the sector, our approach emphasises a culture of empathy, accessibility, and fairness. We are committed to embedding these principles into service delivery, staff training, systems design, and organisational culture, ensuring that vulnerabilities are identified early, recorded accurately, and responded to proportionately.

2. Aims and Objectives

The aims of this policy are to ensure that every resident who engages with our housing services is treated fairly and experiences equitable outcomes, regardless of any personal circumstances that may make accessing our services more difficult.

We recognise that vulnerability can present in many forms, and influence how individuals understand information, communicate with us, or how much support they need to live in their home. For this reason, we are committed to embedding an awareness of vulnerabilities across all aspects of our service design, policy development and day-to-day interactions.

A central aim of this policy is to ensure that residents who require additional support receive timely and appropriate reasonable adjustments. This includes making sure that our processes are sufficiently flexible to accommodate individual needs and that these adjustments are consistently applied across the council's housing functions. By doing so, we seek not only to comply with statutory duties but to actively promote an environment where residents feel understood and supported.

We also recognise that our ability to deliver equitable services depends on staff having the confidence, skills and knowledge to identify vulnerability and respond proportionately. This policy therefore commits us to ensuring that staff are trained, equipped and empowered to recognise when additional support or a modified approach may be needed. We will work to reduce barriers to communication, particularly for residents facing language challenges, low literacy, or digital exclusion, and we will ensure that information is provided in ways that are accessible and meaningful.

We acknowledge that residents living in temporary accommodation may face heightened vulnerability because of instability, uncertainty and limited control over

their circumstances. As part of this policy, we will take additional steps to understand and respond to their needs, ensuring that their access to services is not compromised by the pressures associated with temporary housing arrangements.

Underlying these aims is a commitment to early intervention and collaborative problem-solving. Where vulnerability is identified at an early stage, we can prevent issues from escalating into crisis situations or enforcement action, and instead work with residents to achieve more positive, sustainable outcomes. This intention reflects our broader commitment to openness, transparency and adaptability, ensuring that all residents, regardless of their background or circumstances, can engage confidently and effectively with our housing services.

3. Scope

This policy applies to all housing services delivered by the local authority and is intended to provide a consistent framework for recognising and responding to vulnerability across the full range of our housing functions. It covers every point at which a resident may interact with us, establishing a consistent offer for residents who are less able to access services. All services play a vital role in supporting residents to maintain safe, secure and sustainable homes, and it is essential that staff across all teams are equipped to identify where vulnerability may affect a person's ability to engage with our processes or access the support they need.

By ensuring a shared understanding of vulnerability across all housing functions, we aim to promote a coordinated and consistent approach that enables residents to navigate our services confidently, regardless of their individual circumstances. Whilst we recognise that the focus of this policy is on the council's housing services, as a local authority we have cross cutting services that provide support to residents experiencing difficulty, instability or crisis. It is therefore important that the principles of this policy are embedded through those services as well.

For residents receiving heating and hot water through council-owned or council-managed communal and district heat networks, the principles in this policy will apply to ensure that vulnerable residents are identified, supported and protected. This includes arrangements relating to heat supply interruptions, planned maintenance, billing, metering, complaints and debt recovery.

4. Assessing and Defining Vulnerability

Defining Vulnerability

The Housing Ombudsman defines vulnerability as: *"A dynamic state which arises from a combination of a resident's personal circumstances, characteristics and their*

housing complaint. Vulnerability may be exacerbated when a social landlord or the Housing Ombudsman Service does not act with appropriate levels of care when dealing with a resident's complaint... if effective reasonable adjustments have been put in place, the vulnerability may be reduced."

We understand that 'vulnerability' can be a changeable state influenced by multiple factors and experiences such as age, disability, bereavement, mental health, domestic abuse, physical disabilities and other circumstances. Examples of characteristics and common causes of vulnerability we take into consideration are included at Appendix A. Some of these circumstances are permanent or long term in a person's life, whereas other factors can include negative life events or time limited physical and mental health conditions. The interaction of these factors will determine how vulnerable a person is at any point in time and how much additional assistance or adjustments they may require to sustain their tenancy or lease and manage day to day activities.

Assessing Vulnerability

The Council assesses an applicant's level of vulnerability when they apply for assistance. This applies whether the application is made under homelessness legislation or through a request to join the Council's Housing Register for social housing.

Applicants who present with significant or complex vulnerabilities are referred to specialist services, including Mental Health Services and Adult Social Care. For people with low to medium support needs, the Council provides a range of supported accommodation. This accommodation is intended to offer structured, time-limited support.

Residents are usually expected to stay in supported accommodation for a period of 18 to 24 months. During this time, they receive support that helps them develop the skills and stability needed to move on to independent living. This may be in the private rented sector or in social housing.

However, the supported housing pathway is currently under pressure because of a shortage of suitable and affordable move-on accommodation. As a result, many supported schemes are experiencing reduced turnover, which limits their capacity to take new referrals.

Identifying Vulnerability

Recognising vulnerability requires sensitivity, active listening, and an understanding that individuals may not always feel comfortable disclosing their circumstances.

We identify vulnerability through:

- Resident disclosure.

- Staff observations including home visits (e.g., missed appointments, confusion, distress).
- Information shared by partner agencies (with consent).
- Issues that arise in temporary accommodation.

Assessment and Recording

- Staff approach conversations sensitively and explain why information is being asked for.
- Only relevant information is recorded.
- Information is stored securely and shared only where necessary.

Decision-Making

- Requests for adjustments are assessed promptly.
- Residents receive clear explanations when deciding on reasonable adjustments and whether they are provided or not.
- Where adjustments cannot be made, alternative approaches and measures are explored.

Ongoing Review

- Adjustments are revisited regularly, especially during major case milestones.

Heat Network Vulnerable Customers

For the purposes of communal and district heat networks operated or managed by the Council, a vulnerable customer is any resident whose personal circumstances, health, financial situation, or dependency on heat and hot water places them at increased risk of harm, detriment, or inability to manage their heat supply compared to other customers.

This includes, in particular:

- Residents with health conditions or disabilities that are adversely affected by loss of space heating or hot water
- Older people and households with young children
- Residents dependent on heat or hot water for medical or care needs
- Those in financial difficulty, fuel poverty, or at risk of self-disconnection from a heat network
- Residents with communication, language, cognitive or accessibility needs
- Anyone experiencing temporary vulnerability (for example due to illness, bereavement, hospital discharge, or crisis).

5. Service Provision – considering vulnerabilities

Each service area will consider what additional support or reasonable adjustment is appropriate for vulnerable residents. Where reasonable adjustments are needed, these will be recorded within the resident's customer record. Additional support and reasonable adjustments will vary from service to service, but all services will:

- Contact resident in the way they have selected
- Offer translation services or similar
- Allow formally nominated advocate to act on behalf
- Consider mobility, visual or hearing impairments
- Consider neurodiversity
- Consider personal circumstances e.g. pregnancy, sickness, distress

The below displays examples of reasonable adjustments for specific services:

Parking

Ensuring that adjustments are made for parking arrangements to ensure that even if a resident is in arrears, they still have the provision of disabled parking allocated to them.

Allocations

Considerations and adjustments are built into the allocations process by the way that people are assessed on the housing waiting register, in line with the council's Allocations Scheme.

Damp and Mould

We recognise that certain children and adults are likely to be more severely impacted by exposure to damp and mould. Primarily this includes babies and young children, the elderly, pregnancy and/or some disabilities, including those with respiratory illnesses. Whilst all cases are dealt with in line with Awaab's Law requirements, we specifically prioritise damp and mould remediation in cases where vulnerabilities could result in a heightened susceptibility to illness as a result of exposure.

Our Damp and Mould Policy outlines the approach to triaging and prioritising reported cases of damp and mould.

Heat Networks (including Communal Heating and Hot Water)

We recognise that disruption to heating or hot water can have a disproportionate impact on vulnerable residents, particularly those with health conditions, older people, households with young children, and those dependent on a continuous heat supply.

Where residents receive heating and hot water through a communal or district heat network, vulnerability will be taken into account when prioritising response, communication and resolution. In line with heat network regulatory requirements, incidents affecting vulnerable residents will be prioritised where loss of service may result in increased risk to health, safety or wellbeing.

Complaints and Compensation

Complaint response can be issued either by email or post depending on preference, with written information provided in accessible formats on request, and staff trained to use clear, plain and trauma-informed communication.

Service Design

New services and processes are assessed for their impact on residents with additional needs.

6. Reasonable Adjustments

Reasonable adjustments play a central role in ensuring that residents are not unfairly disadvantaged when engaging with our housing services. We recognise that some individuals may face barriers that affect their ability to communicate, understand written information, attend appointments, or follow standard processes. In these situations, it is essential that we adapt our approach so that residents can access support in a way that is fair, inclusive and responsive to their needs. Reasonable adjustments enable us to do this by modifying how we communicate, how we deliver our services, or how we structure our interactions with residents.

For some residents, communication support is the most important adjustment we can make. This may involve providing interpreting or translation services for those whose first language is not English, or offering written information in plain English, accessible formats, or alternative mediums where literacy, language or sensory needs make standard communication difficult. We may also work with advocates, support workers or family members, where appropriate and with consent, to ensure that a resident can express themselves and fully understand the information they are given. In cases where a resident struggles to engage through standard channels, additional contact attempts or alternative methods of communication may be required to ensure they are not inadvertently excluded.

Other adjustments relate to the council's processes. Where a resident's circumstances mean that rigid adherence to standard procedures would place them at a disadvantage, we may adapt the process accordingly. This could include offering more flexible appointment times, allowing longer or alternative visit arrangements, or adjusting arrears or enforcement pathways where vulnerability is a contributing factor. In some cases, the repairs service may need to prioritise works that have a

direct impact on a resident's health, safety or wellbeing, or modify how appointments are scheduled and communicated. These adjustments ensure that our processes remain fair and proportionate, while still maintaining the integrity of our statutory and operational responsibilities.

In some situations, more practical adjustments are needed to ensure that a resident can access the support they require. These aspects of service delivery will be embedded within processes and procedures across Housing Management, repairs and external support services, ensuring that support is delivered in a coordinated and sensitive manner.

All reasonable adjustments must be proportionate, clearly recorded to ensure they remain appropriate as circumstances change. Our responsibility is not only to identify where adjustments may be needed, but to ensure that they are consistently applied and that residents are informed about what support is available. By embedding this approach across all housing services, we seek to create an environment where residents feel understood, supported, and able to engage confidently with us, regardless of the challenges they may face.

In most cases, we will be able to agree and deliver the required reasonable adjustment with as little delay as possible. In some cases, we may need to consider in more detail how best to overcome the difficulty a vulnerable person is experiencing.

We will consider a range of factors when deciding what reasonable adjustments to make, including:

- Effectiveness - how effective an adjustment might be to prevent the disadvantage. Wherever possible the adjustment should fully address the disadvantage it is meant to overcome.
- Practicality - whether it's possible to make the adjustment in an easy way.
- Resources - whether the resources required to carry out the adjustment are proportionate to the impact. For example, employing a specialist officer to provide support may be appropriate if there are several people who require the specialist support, but it may be more appropriate to buy in a specialist when needed if the skills are rarely required.

The approach to Reasonable Adjustments is also underpinned by the Equality Act 2010, specifically Section 20 regarding Reasonable Adjustments.¹

¹ Equality Act 2010, Section 20 <https://www.legislation.gov.uk/ukpga/2010/15/section/20>

7. Wider Support Offered and signposting to other services

While this policy focuses on housing functions, wider support may be offered through:

- GPs and other medical professionals
- Mental Health Services
- Adult Social Care Services
- Family Wellbeing Centres
- Brent Hubs

These services complement, but do not replace, tailored adjustments within housing services.

Safeguarding vulnerable people

Safeguarding is about protecting a person's right to live free from abuse and neglect. It means working to prevent harm and responding when someone is at risk.

Safeguarding is everyone's responsibility; however safeguarding duties do not replace or delay housing action.

Housing staff have a duty to consider adult safeguarding where there is reasonable cause to suspect abuse, neglect, or risk of abuse or neglect (including self-neglect) in line with the Care Act 2014. Adult safeguarding is about protecting an adult's right to live free from abuse and neglect, while supporting choice and control wherever possible.

Housing staff and contractors delivering services on behalf of Brent Council should refer to this Policy for guidance if they have any concerns.

If a safeguarding concern is identified by a member of staff, they must follow the Council's adult safeguarding procedure to make a referral to Adult Social Care or Children's services.

8. Application Across Housing Services

The principles set out in this policy apply across all housing services, ensuring that every resident receives a consistent, fair and responsive approach regardless of how or where they engage with the council. Vulnerability can affect any aspect of a person's housing experience, and each service area has a crucial role to play in recognising when additional support may be required and in adapting processes to prevent residents from being disadvantaged.

Lettings and Allocations

Staff play a key role in identifying vulnerability early, often at the first point of contact. This may involve adjusting viewing arrangements, providing additional time to explain key tenancy obligations, or offering tailored sign-up appointments that take account of the resident's communication needs, support requirements or personal circumstances. Ensuring that the right support is in place before a tenancy begins helps residents to settle successfully and reduces the risk of tenancy failure.

Income and Arrears

It is essential that staff adopt a supportive and proportionate approach. Financial vulnerability can make it difficult for residents to manage rent payments or respond to standard arrears processes. Staff are expected to explore the underlying causes of non-payment, recognise when a resident may be in financial hardship, and adapt their approach accordingly. This may mean allowing additional time, agreeing more flexible repayment arrangements, or avoiding escalation to enforcement action where vulnerability is clearly impacting the resident's ability to engage, and where early intervention may prevent further escalation.

Where residents receive heating and hot water through a communal or district heat network, staff will consider vulnerability when applying billing, payment recovery or enforcement processes. Loss of heat supply as a result of debt action must be avoided where this would place a vulnerable resident at risk. Early engagement, flexible repayment options and signposting to support, such as Brent's Well & Warm Programme and Resident Support Fund (RSF), will be prioritised.

Repairs and Maintenance

Timely communication and flexibility are especially important. When a resident has a health condition, mobility difficulty, sensory impairment or other vulnerability, repairs can have a significant impact on their wellbeing. Staff should consider prioritising works that affect safety or health, offer flexible appointment times, and ensure residents receive clear and accessible communication about upcoming visits. Where necessary, coordination with other services or support networks may be required to ensure access and reduce stress for the resident, ensuring reasonable adjustments are made to accommodate the resident's needs.

Antisocial Behaviour (ASB)

This approach must recognise that vulnerability may be present in both those reporting ASB and those alleged to be causing it. Staff should adopt a trauma-informed approach, ensuring that communication is sensitive and that the resident's circumstances are fully understood before deciding on next steps. Multi-agency involvement may be necessary where risks are complex or where specialist support is needed. Taking time to understand the context of behaviour can

prevent escalation and ensure that responses are fair, proportionate and rooted in safeguarding principles.

Temporary Accommodation

Residents living in temporary accommodation often experience additional vulnerability linked to instability, uncertainty and limited support networks. Staff must be attentive to the pressures associated with temporary living arrangements and adapt their approach to provide additional reassurance, more frequent communication, and appropriate signposting to support services. Collaboration with welfare, health and community partners is often essential to maintaining stability and preventing further crisis.

Tenancy Management

Officers play a vital role in recognising risk early. This may involve carrying out welfare checks where concerns arise, responding quickly to indications that a resident is struggling, and escalating cases to safeguarding or specialist teams when needed. Tenancy officers should adopt a proactive and practical approach, offering support and advice tailored to the resident's circumstances and ensuring that interventions are coordinated with other internal or external services.

Across all these service areas, the expectations remain the same: that staff take time to understand individual needs, adapt processes to ensure fairness, and work collaboratively to support residents to maintain their homes and access the services they need. This coordinated approach is essential to delivering housing services that are genuinely responsive, equitable and inclusive.

Heat Supply Interruptions

Where there is an actual or anticipated interruption to heating or hot water on a communal or district heat network, vulnerability information will be used to inform:

- prioritisation of response and restoration activities
- communication frequency and method
- escalation thresholds

Additional care will be taken where residents are clinically vulnerable, older, or with young children, or otherwise reliant on continuous heat supply. The Council will take reasonable and proportionate steps to reduce risk and hardship during outages.

9. Legal and Ombudsman Framework

The Council has a duty under the Equality Act 2010 to “advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it” (see Section 8 on Protected Characteristics). However,

as a social landlord we recognise that many more tenants can be vulnerable for reasons other than the characteristics protected under equalities legislation. This policy sets out how we define vulnerability and how we aim to respond to those residents' needs.

The Regulator of Social Housing has issued consumer standards against which landlords will be inspected. The transparency, influence and accountability standard require landlords to be open with tenants and treat them with fairness and respect. The Tenant Involvement and Empowerment Standard require local authority landlords to “treat all tenants with fairness and respect” and “demonstrate that they understand the different needs of tenants, including in relation to the equality strands and tenants with additional support needs”. There is a specific expectation that landlords will “demonstrate how they respond to those needs in the way they provide services and communicate with tenants”. The Regulator’s Consumer Standards Code of Practice also provides that registered providers should be able to demonstrate how they have taken into account the needs of vulnerable households in their approach to tenancy management.

The Housing Ombudsman Complaints Handling Code 2024 states Landlords “must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.” and also “Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk.”

The Building Safety Act 2022 and Fire Safety Act 2023, plus secondary and tertiary legislative changes to the Regulatory Reform Order (Fire Safety) 2021, requires the council to identify and risk assess existing measures to protect the resident if fire occurs. The Fire Risk Assessment must consider the capacity of the resident to respond appropriately to fire alarm signals or signs of fire. Evacuation plans must consider the ability of the resident to make their way to safety, and the council must determine the level of risk to the resident from fire and emergency services response times if a “stay put” policy is in force.

Our duties and approach to vulnerability are informed by:

- Equality Act 2010 – requiring reasonable adjustments and non-discriminatory practice.
- Housing Ombudsman’s Complaint Handling Code.
- Housing Ombudsman Spotlight Reports relating to vulnerability and communication.
- Care Act 2014 – particularly where vulnerability overlaps with social care needs.
- Human Rights Act 1998 – ensuring dignity, fairness, and respect.
- Homelessness Reduction Act 2017 – duties toward those threatened with homelessness.

- Heat Network (Market Framework) Regulations and associated consumer protection requirements, including responsibilities toward vulnerable heat network customers.

The Ombudsman emphasises:

- Clear record-keeping of vulnerabilities.
- Tailored communication and accessibility.
- Avoiding rigid procedural adherence where this disadvantages residents.
- Clear explanations when adjustments are refused and what alternatives have been offered.
- Evidence of learning from complaints involving vulnerable residents.

Mental Capacity

In line with the Mental Capacity Act 2005, we will always assume capacity, but in circumstances where this is in doubt we will ensure that we liaise with appropriate services to ensure that the needs of the resident are met, we will always liaise with those who have legal authority to act on behalf of our residents who lack capacity.

That may be a representative who has or is a:

- Lasting Power of Attorney (LPA)
- Deputyship Order from the Court of Protection
- Litigation friend appointed in Court proceedings if the resident lacks capacity to litigate

10. Compliance, Monitoring and Review

Compliance with this policy will be monitored through regular reviews. This will include case audits by the relevant manager and service audits to ensure all our residents are able to access our services and receive equitable outcomes.

Right of Appeal

- If a resident is not satisfied with the service they have received, they can access the council's complaints procedure. It is of utmost importance that Officers responding to complaints from residents with vulnerabilities properly consider these vulnerabilities in their response.

Success measures

- Residents feel that they are treated fairly and with respect when interacting with the council.
- Improved staff confidence in handling vulnerabilities

Support and training for Staff

- Vulnerability-aware practice is embedded across all housing-related policies, procedures, and reviews.

- Staff awareness of the key drivers of vulnerability (set out in Appendix A)

Appendix A – Common causes of Vulnerability

Vulnerability refers to any personal circumstance or characteristic that may affect a resident's ability to communicate, access, understand, or engage with housing services. It is not limited to disability and can arise from a broad range of factors.

Vulnerability may be:

- Permanent – such as long-term disabilities or degenerative conditions.
- Long-term but fluctuating – such as periods of mental ill-health.
- Temporary – such as bereavement, injury, or acute illness.
- Situational – such as domestic abuse, trauma, or a sudden life event.
- Hidden – not immediately apparent or disclosed.
- Linked to accommodation status – such as the instability of temporary accommodation.

Common causes of Vulnerability

The common causes of vulnerability are broad categories used to identify the underlying factors that may give rise to additional or different needs for residents. They help explain why someone may require support by capturing key aspects of their health, circumstances, resilience, safety, or capability.

The list below gives examples of the circumstances and characteristics under these five definitions which can lead to residents having additional or different needs. The characteristics listed below serve as examples, rather than an exhaustive or definitive list.

Definitions

- Health: Health condition or illness that affects ability to carry out day-to-day tasks
- Life events: Circumstances that may negatively affect a person's life
- Resilience: Low ability to withstand financial or emotional shock
- Safety: When a person is in a situation that compromises their personal safety
- Capability: Low knowledge or confidence in managing day-to-day affairs

Examples of common causes of vulnerability

Health:

- Sensory impairments
- Chronic health conditions
- Mental ill-health

- Physical disabilities

Life Event:

- Homelessness risk or temporary accommodation
- Bereavement or trauma
- Living with or caring for someone (including young carers)

Resilience

- Social isolation or support networks
- Severe financial hardship
- Digital exclusion

Safety:

- Domestic abuse or coercive control
- Discrimination and racism

Capability

- English not being a first language
- Literacy barriers

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EQUALITY IMPACT ASSESSMENT (EIA)

POLICY/PROPOSAL:	Housing Vulnerable Residents and Reasonable Adjustments Policy
DEPARTMENT:	Residents and Housing Services
TEAM:	Housing Services
LEAD OFFICER:	Andrew Phillips
DATE:	01/09/2026

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.

This policy sets out the Council's approach to ensuring that residents with vulnerabilities receive fair, equitable, and accessible housing services. The policy recognises that vulnerability can affect how individuals engage with housing processes, understand information, report repairs, and sustain their accommodation. Therefore, the policy aims to ensure that service design, policy development and day to day interactions are not more difficult for residents with challenging personal circumstances. A central aim of this policy is to ensure that residents who require additional support receive timely and appropriate reasonable adjustments. By doing so, the Council will not only comply with statutory duties, but actively promote an environment where residents feel understood and supported.

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

This policy will impact all Council tenants, or adults seeking Council housing services, with vulnerabilities, the level of which is assessed when they apply for assistance. Vulnerabilities are identified through resident disclosure, staff observations including home visits, information shared by partner agencies (with consent) and issues that arise in temporary accommodation. As well as vulnerabilities, the policy covers reasonable adjustments which is how we will adapt our approach so residents with barriers to communication, understanding information, attending appointments or following standard processes.

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		X	

progression, and health outcomes.			
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 Carers. Refugees/Asylum Seekers		

* 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.

A range of data sources have been used to benchmark against the policy, outlined in section 7. Additionally, quantitative data from the Have Your Say consultation, which ran for six weeks, has also been used to inform the content in this document.

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 policy will specifically impact adults, because it is for individuals with vulnerabilities who interact with housing services. Although children may be affected by the vulnerabilities of their parents, they will not be identified as having them under this policy due to the methods of identifying vulnerabilities.	Only adult residents engage with housing services in Brent.

Care Experience	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
This policy will support people with care experience who may have vulnerabilities, such as instability, mental health conditions or trauma associated with their experiences in care. The policy aims to ensure that residents who engage with housing services are treated equitably, regardless of personal circumstances that may make accessing services more difficult.	Children in care and care leavers - Preventing Exploitation Toolkit Care experienced people are a particularly vulnerable group – they may have experienced abuse, neglect or trauma. This can lead to significant emotional, behavioral and mental health needs. The experiences of being in care can continue to impact on children and young people after they have left the care system, especially if the transition into family or adult life is challenging and if the support they receive is unable to meet their needs.

	Care leavers are often required to become independent at a younger age than their peers. They may be expected to become responsible for finding housing without the support networks available to many other young adults. This transition can be challenging and stressful, and exacerbated by previous traumas from care.
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Disability	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
This policy will support residents with disabilities to be treated fairly and experience equitable outcomes, regardless of personal circumstances that may make accessing housing services more difficult. The policy aims to make sure processes are flexible to accommodate individual needs, and residents with disabilities will receive timely, and appropriate reasonable adjustments.	Trust for London - Barriers to housing and services across London neighbourhoods Whilst not directly referencing disabilities, research from Trust for London shows that Brent has severe barriers to housing and services, which includes both affordability, as well as the proximity of local services. Where this is accompanied by disability, it could make services more difficult to access for residents.

Gender Reassignment	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
This policy will support transgender residents, or residents who have experienced gender reassignment, to be treated fairly and experience equitable outcomes, regardless of personal circumstances or stigma that may make accessing housing services more difficult. The policy aims to make sure processes are inclusive of residents' identity and experiences.	There was no robust data measuring the number of people who have experienced gender reassignment who are currently homeless in the UK. However transgender individuals face disproportionately high rates of housing instability and homelessness which can stem from familial rejection, workplace and rental discrimination, or the lack of trans-inclusive, gender affirming temporary accommodation. Published evidence and findings suggest some of the homelessness experiences of transgender people are distinct and closely related to their gender identity.

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

We do not have data to show married people or those in a civil partnership have more vulnerabilities, but all residents living in Brent Housing will be positively impacted by the Council's redesign of housing services to be more inclusive and accessible to people with vulnerabilities and other challenges.	
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Pregnancy and Maternity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<p>This policy will positively support residents during and immediately after pregnancy who engage with housing services.</p> <p>The policy aims to ensure that residents who engage with housing services are treated equitably, regardless of personal circumstances that may make accessing services more difficult.</p>	<p>Infant Journal</p> <p>Pregnancy is a vulnerable time of life. Housing insecurity during pregnancy can significantly elevate the risk of severe maternal morbidity, preterm delivery, and low infant birth weight, therefore it is important that pregnant residents who seek housing support receive timely and appropriate reasonable adjustments.</p> <p>Frequent moves and moves out of area can affect the degree to which families engage with maternity and health services. Relationships with professionals can break down and families may not know how or where to access services in a new area. It can also be harder for home visits to take place in temporary accommodation, and because both parents and professionals can become overwhelmed and preoccupied with the housing problems, these issues can overshadow health and well-being. Therefore, when residents seek housing services their pregnancy or maternity should be taken into account under the vulnerabilities policy.</p>

Race and Ethnicity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
National evidence shows that some ethnic minority groups are disproportionately represented amongst households experiencing homelessness and housing need. The policy will help ensure vulnerabilities are identified consistently and that residents receive equitable support regardless of race or ethnicity.	<p>Gov.uk ethnicity facts and figures - homelessness</p>

Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<p>We do not have data to show people with different religions or beliefs have more vulnerabilities, but all residents living in Brent Housing will be positively impacted by the Council's redesign of housing services to be more inclusive and accessible to people with vulnerabilities and other challenges.</p> <p>National data shows that religion or belief may influence their housing needs, availability to engage with services, or accommodation requirements. The policy encourages a flexible and inclusive approach that recognises these needs and promotes equitable service access.</p>	<p>People experiencing homelessness, England and Wales: Census 2021 – Ethnic group, national identity, language and religion tables</p>

Sex	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<p>We do not have data to display that sex impacts directly on vulnerabilities, however the policy has provision in place to ensure that where sex is likely to impact on a situation (e.g. women are more likely to be impacted by domestic abuse/coercive control), that this is taken into account.</p>	

Sexual Orientation	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<p>We do not have data to show people of different sexual orientations have more vulnerabilities, but all residents living in Brent Housing will be positively impacted by the Council's redesign of housing services to be more inclusive and accessible to people with vulnerabilities and other challenges.</p>	<p>Lesbian, gay, bisexual and transgender people's experiences of homelessness - GOV.UK</p> <p>There was no robust data measuring the number of LGBT people currently homeless in the UK. However, existing evidence indicated that LGBT people may be at a greater risk of experiencing homelessness than people not identifying as LGBT.</p> <p>Published evidence and the findings from this study suggest that some of the homelessness experiences of LGBT people are distinct, and closely related to their sexual orientation or gender identity. Issues related to sexual and gender identity often underpin their triggers of homelessness, for example familial abuse that is homophobic, biphobic or transphobic. They face discrimination by landlords and employers,</p>

	<p>familial and social networks can dissipate when they come out, and concerns for safety restrict their housing options.</p> <p>Mainstream temporary accommodation can be a hostile space for LGBT homeless people. So they sometimes rely on informal, hidden and sometimes unsafe temporary accommodation.</p>
--	---

Socio-Economic Status	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
Financial hardship, debt, unemployment and housing affordability pressures can increase the likelihood of housing vulnerability. The policy supports early identification of these factors and seeks to ensure residents facing socio-economic disadvantage can access support proportionate to their needs.	<p>Trust for London - Brent poverty and inequality data</p> <p>Trust for London displays Brent as having an average poverty rate compared to other London boroughs; this is also reflected in housing statistics including affordability, homelessness and temporary accommodation.</p>

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.

Engagement was conducted via consultation with Brent tenants and leaseholders who would be affected by the policy.
--

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

There are gaps in Brent specific data on housing vulnerabilities, as set out in section 7.

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, which could be strengthened with high awareness of this policy amongst staff so they can signpost tenants to the support services, make reasonable adjustments and so forth. For other protected characteristics, the policy is considered to have a neutral impact as it applies consistently to all tenants.

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
Need for housing staff to be aware of the content of the policy	Training and awareness for staff to understand the impact of vulnerabilities on housing	Jodi Cooper	12.04.27	Ongoing

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

The ongoing impact of the policy will be monitored through its implementation; officers should feel confident to spot residents who are vulnerable and to then signpost to other services to help support them further.

SECTION F – SIGN OFF

	Signature	Date
Officer:	Andrew Phillips	01.09.26
Reviewing Officer or Head of Service	Jodi Cooper	01.09.26

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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Compensation & Remedies Policy Appendices

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London Borough of Brent

Housing Compensation and Remedies Policy

This policy sets out Brent Council's approach to compensation and remedies for residents where there has been a service failure, missed repairs appointment, complaint, resident engagement activity or situation resulting in home loss or decant. It provides a framework for determining appropriate remedies and compensation.

Owner:	Spencer Randolph, Director of Housing Services	
Approved by:	DMT/Board/Cabinet	dd/mm/yyyy
Review cycle: (years)	2	
Next review date:	dd/mm/yyyy	



Regulator:	<ul style="list-style-type: none"> • Regulator of Social Housing (RSH) • RSH Consumer Standards <ul style="list-style-type: none"> ○ Transparency, Influence and Accountability Standard ○ Safety and Quality Standard ○ Tenancy Standard • RSH Consumer Standards Code of Practice
Legislation:	<ul style="list-style-type: none"> • Social Housing (Regulation) Act 2023 • Housing Act 1996 • Housing Act 1985 • Secure Tenants of Local Housing Authorities (Right to Repair) Regulations 1994 • Land Compensation Act 1973 • Equality Act 2010 • Localism Act 2011 • Housing and Regeneration Act 2008
Codes of Practice:	<ul style="list-style-type: none"> • Housing Ombudsman Complaint Handling Code • Housing Ombudsman Remedies Guidance • Housing Ombudsman Compensation Guidance • Housing Ombudsman Dispute Resolution Principles • Local Government and Social Care Ombudsman Guidance on Remedies • Regulator of Social Housing Consumer Standards Code of Practice
The policy also operates in the context of:	<ul style="list-style-type: none"> • Corporate Complaints Policy • Equality, Diversity and Inclusion Strategy 2024–2028 • Tenant Engagement Strategy

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A trusted housing service where colleagues work together with purpose, professionalism and accountability to deliver fair, responsive and high-quality services that make a positive difference for residents.	
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1. Purpose

This policy covers all instances where tenants and leaseholders may be compensated or receive remedies from Brent Housing Management, including for a:

- Participant in resident engagement activities
- Missed repairs appointment
- Service failure or issue picked up through complaints process

- Situation leading to home loss or decant

The policy outlines our commitment and principles to ensure that residents are fairly and consistently compensated and that any issues encountered are remedied consistently and proactively.

2. Scope

This policy applies to:

- All Brent Council tenants, leaseholders, temporary accommodation residents and shared owners.
- All council landlord service functions: relating to the management of Brent Council owned properties and estates, and the residents living in those properties.
- All complaints that fall within the Housing Ombudsman's jurisdiction.
- Informal issues where the council determines compensation is appropriate, even if no formal complaint has been submitted.

2.1 Guiding Principles

Our approach to compensation and remedies is grounded in a clear set of principles designed to ensure residents are treated fairly and consistently. These principles guide how we assess impact, and determine appropriate remedies, while recognising that each resident's circumstances are unique. They help ensure decisions are transparent, proportionate, and focused not only on redress but also on driving service improvement.

- **Fairness & proportionality:** Awards reflect the impact on the resident and are supported by clear reasoning.
- **Consistency:** Standardised frameworks guide decision-making while allowing discretion when needed.
- **Individual circumstances:** Similar failures may impact residents differently; decisions are on a case-by-case basis.
- **Practical remedies first:** Take proactive steps to remedy or resolve concerns and situations in the first instance
- **Learning & improvement:** Outcomes inform service improvement and help prevent recurrence.
- **Clear governance:** Approval limits and escalation routes are defined and followed.
- **Respect:** Throughout the process, tenants will be treated with respect and dignity at all times.
- **Acknowledging impact:** The Council will recognise the inconvenience, distress, disruption or financial impact caused by service failures and consider these when determining an appropriate remedy.

2.2 Definitions

Remedies

Where the Council has failed to deliver a service to the expected standard, including where there has been a delay, missed appointment, failure to complete a repair, poor complaint handling or other service failure, the Council will consider what action is needed to put things right. The Council acknowledges the inconvenience and stress this can cause. The categories below set out the practical remedies that may be used to put things right.

- Completing repairs
- Replacing damaged items (where it is a landlord responsibility)
- Providing dehumidifiers and/or temporary heating
- Offering redecoration
- Rebooking or prioritising appointments
- Goodwill gestures such as vouchers or flowers
- Practical adjustments for vulnerable residents

The list set out above is not exhaustive. Due to the variety and nature of cases received by the council, staff may use their discretion to decide on the best remedy for a case, tailored to individual factors to be considered when deciding on remedies. These factors can include:

- How long the situation has been going on for
- How often the situation has occurred
- The severity and impact on the resident

Specific levels of compensation are set out in section 6 of this policy. We will review the levels of compensation regularly in line with best practice, guidance from the Housing and Local Government and Social Care Ombudsman Services.

Compensation

Compensation falls into three main categories:

1. Mandatory payments- these payments must be made in line with the Housing Ombudsman's guidance
2. Quantifiable financial losses- this is compensation for reasonable additional costs residents incur due to landlord failings. Residents must be able to evidence these costs.
3. Discretionary payments- these address non-financial impacts as a result of landlord failings

Mandatory payments

Mandatory payments are those that the council is legally required to provide in specific circumstances. These payments are not discretionary and must be issued whenever the qualifying criteria are met.

Examples include:

- Home loss payments
- Disturbance payments
- Right to Repair scheme payments

Quantifiable financial losses

Quantifiable financial losses are reimbursed where a resident has incurred a direct and reasonable cost as a result of the organisation's action or failure. These costs must be evidenced, clearly linked to the issue, and proportionate to the circumstances.

Examples include:

- Extra heating costs
- Takeaway meals when a kitchen is unusable
- Laundrette costs
- Residents' cleaning or minor repair costs resulting from landlord failure

Discretionary payments

Discretionary payments are used where the impact on the resident is non-financial but still significant. These payments recognise inconvenience, disruption, or poor service that falls short of expected standards, and they help ensure a fair and consistent resolution.

Examples include:

- Time and trouble
- Distress and inconvenience
- Loss of room use or amenities
- Delays beyond published standards
- Poor complaint handling
- Missed emergency appointments
- Extended periods using dehumidifiers

3. Our Values

3.1 Brent Landlord Services Vision Statement

A trusted housing service where colleagues work together with purpose, professionalism and accountability to deliver fair, responsive and high-quality services that make a positive difference for residents.

3.2 Equality, Diversity and Inclusion Strategy

This policy embodies Brent Council's commitment to Equality, Diversity and Inclusion within our work and the services we provide. Please refer to our Equality, Diversity and Inclusion Strategy here: [brent-equity-diversity-and-inclusion-strategy-2024-28-digital-version-v2.pdf](#)

All decisions must consider:

- Resident characteristics and vulnerabilities
- Communication needs
- Whether delays or failures disproportionately affected individuals due to a vulnerability such as health or disability

Reasonable adjustments must be offered throughout the process.

4. Reimbursement for participation in resident engagement activities

We appreciate the time residents give to take part in resident engagement. Their input is vital to shaping our services, ensuring that resident voice is at the centre of our approach, building on the work set out in the council's Tenant and Engagement Strategy.

When taking part in engagement activities, incentives offered to residents will be clearly communicated before they agree to take part in any activities, and incentives will be calculated based on the assessment of impact, for example meetings outside of usual hours, the duration of the activity or the type of activity.

The council may offer one or more of the following rewards:

- Shopping vouchers or gift tokens of between £10 and £50, the value of which will be determined by the budget holder and will reflect the nature of involvement and level of time and effort required. The council will inform invitees of the value of the reward at the earliest possible stage, preferably when they are first invited to participate.
- Other prizes deemed appropriate by the project manager / Head of Service, such as goodie bags or branded goods.

- Prize draws to promote participation from a larger number of tenants and leaseholders. A prize draw may be offered on occasions where a reward for every participant does not deliver value for money.
- Free training opportunities

If a resident is in rent arrears, the council will offer the option to have the value of any voucher or prize credited to their account to reduce the amount owed, should the resident prefer. If the resident does not state a preference, they will be rewarded with the original voucher or prize offered.

5. Compensation and remedies for missed repairs appointments

Repair appointments are allocated within defined time slots, which are confirmed at the point of booking. If a contractor fails to attend within the agreed time limits the resident will be entitled to missed appointment compensation of £10, which can be claimed by contacting the contractor. Where the contractor cancels an appointment then the contractor will pay compensation of £25 where it is cancelled within 1 working day of the appointment slot and £100 to the resident if it is cancelled on the day of the appointment. Where a missed appointment is identified through a formal complaint, this will be taken into account and added to any complaint-related compensation awarded. In addition, a remedy will be applied by prioritising the rebooking of the repair appointment.

Missed appointments are defined as follows:

- Where the Contractor arrives before the appointed time slot without having had prior agreement to changing the appointment time
- Where the Contractor is more than 15 minutes later than the appointed time slot agreed

6. Putting things right through the complaints process

We will always aim to resolve the complaint at the first point of contact, resolving the issue before compensation or remedies are required.

If it is not possible to resolve the complaint quickly, or if it is clear that we need to investigate it in more detail, we will refer it to the relevant department for investigation. All findings must be fully considered and agreed before compensation and remedies are decided. Complaint letters will outline how the calculation was made, as well as a link to this policy to ensure that calculations are transparent. As set out in section 4.6 of this policy, discretionary payments will be applied as part of complaint investigation compensation.

When assessing complaints, the council provides a two stage corporate complaints process, which is summarised below:

6.1 Stage 1

Stage 1 corporate complaints are acknowledged within 5 working days of the complaint being received, and we aim to respond within 10 working days of the complaint being acknowledged. However, where a complaint is complex, covers a lot of historic data or there are various strands to the complaint, the Council may extend the complaint by up to a further 10 working days.

In the majority of cases, matters are resolved at this point. However, the Stage 1 response will inform the complainant of their right to request a final review (Stage 2) of their complaint if they remain dissatisfied. If the complainant does wish to proceed to this stage, residents are encouraged to clearly state what parts of their complaint have not been addressed satisfactorily and the reasons why, to make it easier for the investigator to focus their investigation on these areas.

6.2 Stage 2

Stage 2 corporate complaints are investigated independently from the department by the Complaints team. Stage 2 complaints will be acknowledged within 5 working days from the receipt date of the Stage 2 request, and we aim to complete the investigation within 20 working days of the complaint being acknowledged. However, where a complaint is complex, covers a lot of historic data or there are various strands to the complaint, the Council may extend the complaint by up to a further 20 working days.

If the complainant still remains dissatisfied, they have the opportunity to have their complaint considered by the Housing Ombudsman, details of which will be included in the response.

6.3 Putting actions on hold during the investigation

Any actions we are taking that may have given rise to the complaint - for example Council Tax recovery proceedings - may be put on hold until we have finished the complaint investigation.

6.4 Complaints to the Housing Ombudsman

If your complaint concerns the management of Council Housing stock or repairs, you can refer your concerns to the Housing Ombudsman. You can do this at any time by using the contact details below:

Housing Ombudsman Service
PO Box 1484,
Unit D,
Preston,

PR2 0ET PO

Email: info@housing-ombudsman.org.uk

Website: www.housing-ombudsman.org.uk

If a complaint is escalated to the Housing Ombudsman, we will comply with any recommendations, which could include the payment of compensation.

The Housing Ombudsman and Local Government Ombudsman regularly publish information about their decisions, whether on individual cases or patterns across the housing and public sector. The council commits to regularly review this information and use it to inform our learning, decision making and compensation payments for future similar cases.

6.5 Group Complaints

Residents may raise a complaint on behalf of a group. We will register a group complaint when multiple residents are affected by the same issue or closely related issues arising from a common cause. Each participant can opt in or out. Where grouping would be unfair or impractical, we will proceed with individual complaints.

In these cases:

- **Compensation is only paid to the named complainant who raised the complaint on behalf of the group**, unless individual households can demonstrate their own personal detriment.
- Where multiple households are affected and impacts differ, awards are calculated individually.

6.6 Impact categories for complaints compensation

When awarding compensation, the council will credit a resident's rent account if they are in arrears, make direct payments to their bank or, if the amount awarded is under £500, compensation is awarded as a postal voucher to be claimed at any post office.

The table below sets out the criteria the council will consider when issuing a compensation payment. As part of the assessment, the council will consider the impact of the service failure on a resident, as well as their household.

Level	Description
Low	Service failures with a minimal impact and/or short term inconvenience; including routine repairs and missed appointments.
Medium	Service failures in this threshold include moderate inconvenience, without permanent impact. Impacts include repeated failures or significant delays in routine repairs.
High	Major service failures with significant impact, including physical or emotional effects. Examples include long-term issues like an

	ongoing leak causing property damage and requiring temporary accommodation.
Severe	Considered where the impacts include substantial, long-term effects on the resident, including physical and/or emotional impacts. Examples include long stays in temporary accommodation due to repair mishandling and mishandling of vulnerable residents' cases.

7. Exclusions

Compensation may not be awarded in all circumstances. The below is a non-exhaustive list of instances where compensation will not be paid:

- All statutory and contractual obligations have been fulfilled by Brent
- Delays to repairs where the resident seeking compensation has failed to provide access on three or more occasions for the Council to address the fault/issue
- Personal injury claims
- Damage beyond our control e.g. storm damage or flooding
- Loss or damage is caused by third parties not working for Brent
- Claims where residents are advised to use their contents insurance
- Disrepair claims managed through separate processes
- Loss or damage is due to unauthorised alterations to the property

Insurance and Contractor responsibilities

The below summarises the insurance process for leaseholders, tenants and contractors. Further information can be found at the following council web page: [Insurance claims | Brent Council](#)

Leaseholders

- Property damage and insurance excess claims must go through the building insurance process.
- This policy does not duplicate or override insurance obligations.

Tenants

- Contents losses must be claimed through their contents insurance.
- Where the Council's failure caused quantifiable financial loss, compensation may be considered.

Contractors

- If contractor actions caused the failure or damage, they may be recharged.

- The Council may compensate the resident first and then recover costs from the contractor.

8. Mandatory payments

As set out in section 4.4 of this policy, mandatory payments are those that the council is legally required to provide in specific circumstances. This includes in the circumstance of home loss and disturbance payments.

Where a tenancy is ended because the property is being disposed of or demolished, the tenant is entitled to statutory Home Loss Compensation and Disturbance Payments.

In these cases, the Area Tenancy Manager will inform the resident that any rent arrears will be reduced by the amount of Home Loss Compensation they are entitled to receive, as set out in the council's Decant Policy.

9. Rent arrears

In some cases, tenants may have compensation awards reccredited to their rent account. Such situations include:

- For internal compensation awards, tenants with arrears will have payments automatically credited to the rent account, unless a manager authorises an exception due to hardship.
- This does not apply to Ombudsman ordered payments, which must be paid directly to the resident.

10. Learning, monitoring and assurance

This policy is implemented through the Council's Corporate Complaints Policy. Compensation and remedies are monitored through the Council's Corporate Complaints Dashboard, as well as through the Annual Complaints Report.

The Council will monitor both the awards made and the delivery of agreed remedies to ensure that actions committed to as part of a complaint or service recovery are completed. Learning from monitoring and quality checks will be used to identify recurring issues and improve services.

The Council will use quality checks to ensure that compensation and remedies are applied fairly and consistently, and that agreed actions have been completed. Monitoring will help identify recurring service failures and areas for improvement. Where issues are identified, the Council will use this learning to improve services and reduce the risk of similar failures occurring again.

EQUALITY IMPACT ASSESSMENT (EIA)

POLICY/PROPOSAL:	Housing Compensation and Remedies Policy
DEPARTMENT:	Housing Management
TEAM:	Quality Assurance
LEAD OFFICER:	Eleanor Clynes
DATE:	07/10/2026

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.

This policy sets out Brent Council's approach to compensation and remedies where residents experience a service failure, missed repairs appointment, complaint, resident engagement activity or situation resulting in home loss or decant. It aims to ensure that remedies and compensation are consistent, while taking account of individual circumstances.

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

The policy applies to all residents within its scope, regardless of protected characteristic. However, the impact of a service failure may differ depending on a resident's circumstances, including age, disability, pregnancy and maternity, race and ethnicity, religion or belief, sex, sexual orientation and socio-economic circumstances. The policy therefore requires individual circumstances, vulnerability, communication needs and reasonable adjustments to be considered when determining appropriate remedies and compensation.

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		
Carers		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.

Brent does not currently hold sufficiently detailed compensation and remedies data to establish whether awards vary by protected characteristic or whether particular groups experience disproportionate impacts. Monitoring of compensation and remedies, including equality-related information where available and appropriate, should therefore be used to strengthen the evidence base. [Annex 6: Consumer standards – Equality impact assessment - GOV.UK](#)

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 policy has a positive impact on residents of different age groups by requiring individual circumstances and the impact of service failures to be considered when determining appropriate remedies. Older residents and younger residents may experience disruption differently, particularly where repairs, loss of amenities, temporary accommodation or prolonged service failures are involved.	Effective and respectful landlord communications: Resident Panel report - GOV.UK

Care Experience	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy applies equally to residents with care experience and does not create a specific barrier for this group. Its emphasis on individual circumstances and fair treatment provides scope to take account of any additional impact a service failure may have on a resident with care experience.	Effective and respectful landlord communications: Resident Panel report - GOV.UK

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

The policy has a positive impact on disabled residents because it recognises that the same service failure may have a greater or different impact depending on a resident's circumstances. When determining an appropriate remedy, consideration should be given to vulnerability, disability, communication needs and any reasonable adjustments required.	Disability support and social housing: Resident Panel report (accessible version) - GOV.UK
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Gender Reassignment	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy applies equally to residents regardless of gender reassignment and does not introduce any specific barriers for transgender or non-binary residents. Residents will be treated fairly and with respect throughout the compensation and complaints process.	Effective and respectful landlord communications: Resident Panel report - GOV.UK

Marriage and Civil Partnership	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy applies equally to residents regardless of marriage or civil partnership status and does not introduce any specific barriers for this group.	Effective and respectful landlord communications: Resident Panel report - GOV.UK

Pregnancy and Maternity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy has a positive impact on residents who are pregnant or have recently given birth by allowing the circumstances and impact of a service failure on the household to be considered when determining an appropriate remedy. For example, prolonged disruption, loss of essential amenities or unsuitable living conditions may have a greater impact during pregnancy or following childbirth.	Effective and respectful landlord communications: Resident Panel report - GOV.UK

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

The policy applies equally to residents regardless of race or ethnicity and does not introduce any specific barriers. The policy's emphasis on fairness, individual circumstances and accessible communication supports equitable access to remedies.	Effective and respectful landlord communications: Resident Panel report - GOV.UK
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Religion or Belief	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy applies equally to residents regardless of religion or belief and does not introduce any specific barriers. Individual circumstances can be considered where a service failure has a particular impact on a resident's ability to practice their religion or belief.	Effective and respectful landlord communications: Resident Panel report - GOV.UK

Sex	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy applies equally to residents regardless of sex and does not introduce any specific barriers. Individual circumstances and the impact of a service failure on the resident and their household will be considered when determining appropriate remedies.	Effective and respectful landlord communications: Resident Panel report - GOV.UK

Sexual Orientation	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy applies equally to residents regardless of sexual orientation and does not introduce any specific barriers. Residents will be treated fairly and with respect throughout the complaints, compensation and remedies process.	Effective and respectful landlord communications: Resident Panel report - GOV.UK

Socio-Economic Status	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy has a positive impact on residents experiencing financial hardship by providing a clear and consistent framework for considering compensation for quantifiable financial loss, distress	Effective and respectful landlord communications: Resident Panel report - GOV.UK

and inconvenience. Where appropriate, compensation may also be credited to a resident's rent account to reduce arrears, while the policy recognises that individual circumstances and hardship may need to be considered when determining how compensation is paid.	
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Other Relevant Groups - Carers	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy has a positive impact on residents with caring responsibilities because it allows the individual impact of a service failure to be considered. Disruption to repairs, loss of amenities, decants or prolonged service failures may have additional consequences where a resident is responsible for caring for another person.	Effective and respectful landlord communications: Resident Panel report - GOV.UK

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.

A 6-week consultation on the draft Housing Compensation and Remedies Policy has provided residents and relevant stakeholders with an opportunity to comment on the proposed approach.

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

N/A

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.

This policy has a positive impact on all Brent Housing residents, including those with protected characteristics.

SECTION D - RESULT

Select one of the following options with an "X".

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X
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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
Lack of EDI data on Housing Management residents makes it difficult to assess whether the policy has different impacts or outcomes for residents with different protected characteristics.	Housing Management is undertaking work to improve the collection of EDI data, including through new Visiting Officers and an EDI data collection letter campaign. Improved data will support future monitoring of compensation and remedies outcomes by relevant equality characteristics.	George Kockelbergh	June 2027	In progress

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

The impact of the policy will be monitored through compensation and remedies data, complaints monitoring, quality assurance and resident feedback. As Housing Management improves the collection of EDI data, compensation and remedies outcomes will be reviewed by relevant equality characteristics where sufficient data is available to identify any differences in access, awards or types of remedies provided.

SECTION F – SIGN OFF

	Signature	Date
Officer:	Eleanor Clynes	07/10/2026
Reviewing Officer or Head of Service	 Abiola Adegoke	7 October 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:	

 Brent	Cabinet 9 November 2026
	Report from the Corporate Director of Resident and Housing Services
	Lead Member – Cabinet Member for Housing, Homelessness & Renters (Councillor Robert Johnson)
Housing Management Complaints Performance and Service Improvement Annual Report 2025/26	
Wards Affected:	All
Key or Non-Key Decision:	Non-Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
List of Appendices:	Two Appendix 1: Housing Ombudsman's performance report for Brent 2024/2025 Appendix 2: Council's Self-Assessment against the Housing Ombudsman's Complaint Handling Code
Background Papers:	N/A
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Mariza Barros, Complaints and Casework Manager 0208 937 1381 Mariza.barros@brent.gov.uk

1.0 Executive Summary

- 1.1. This annual report sets out the Housing Management Service's complaints performance for the period 1 April 2025 to 31 March 2026. It provides an overview of complaint volumes, complaint outcomes, compensation awarded, the key themes and causes of complaints, and the learning and service improvements that have been implemented as a result.
- 1.2 As Brent Council Housing Management is a registered provider of social housing, complaints relating to landlord services fall within the jurisdiction of the Housing Ombudsman. This report has therefore been written separately to the full Council Complaints Report, supporting the reporting arrangements for Housing Ombudsman complaints.

1.3 The report also includes the Housing Ombudsman's latest published landlord performance information for Brent 2024/25 (Appendix 1), and the Council's self-assessment against the Housing Ombudsman's Complaint Handling Code (Appendix 2).

1.4 **Key Headlines 2025/26**

- Complaint volumes increased significantly, with Stage 1 and Stage 2 complaints more than doubling compared to last year.
- Stage 1 complaints rose from 549 to 1191(83.2 per 1,000 homes), and Stage 2 complaints rose from 94 to 198 (13.8 per 1,000 homes). This increase reflects both improvements in complaint recording and accessibility, alongside continued issues in some areas of service delivery and the use of AI to generate and refer complaints.
- Although complaint volumes increased significantly, Brent's complaint rates remain broadly comparable with other London landlords, with Stage 2 complaint rates below the London median.
- The escalation rate (Stage 1 → Stage 2) fell slightly, from 18.1% to 16.8%.
- Total compensation paid across Stage 1 and Stage 2 rose from £109,787 in 2024/25 to £138,306 in 2025/26 across 449 cases. The average Stage 2 payment reduced from £526 to £424, while the average Stage 1 payment increased from £234 to £259.
- Repairs remain the largest single driver of complaints at both stages, with delays in service delivery identified as the most common underlying cause.
- Ombudsman performance improved with Brent's maladministration rate falling from 92% in 2023/24 to 68.2% in 2024/25. There were no complaint handling failure orders and no severe maladministration findings.

2.0 **Recommendation(s)**

2.1 Cabinet is asked to note Brent Housing Management's performance in managing and resolving complaints during 2025/26 and provide any comments or direction.

2.2 Cabinet is asked to note the Council's latest self-assessment against the Housing Ombudsman's Complaint Handling Code.

2.4 Cabinet is asked to approve the report for submission to the Housing Management Advisory Board and the relevant Scrutiny Committee(s).

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 As a Council, we are committed to listening to our residents and ensuring that their experiences help us to improve the services we provide. Complaints are an important part of this process, providing valuable insight into where services are working well and where improvements are needed.
- 3.1.2 During 2025/26, Housing Management received 1,191 Stage 1 complaints and 198 Stage 2 complaints. This represents a significant increase compared with the previous year. The increase reflects a combination of changes to complaint recording and accessibility, as well as continued challenges in some areas of service delivery. It is therefore important that we look beyond complaint volumes to understand the issues residents are raising and the learning arising from them.
- 3.1.3 The complaints data shows that repairs continue to be the most significant source of dissatisfaction, with delays and communication being the biggest issue causing resident dissatisfaction.
- 3.1.4 The Council has continued to use complaints as a source of learning and has taken action in response. This includes strengthening the management of complaints and learning within the new responsive repairs contracts, improving customer communications, developing and reviewing key Housing Management policies, and introducing more detailed case reviews to identify wider service improvements.
- 3.1.5 There are also positive signs in the wider performance data. Overall satisfaction with landlord services increased from 51.3% to 57.5%, while satisfaction that the Council listens to residents' views and acts on them increased from 39.2% to 45.6%. However, satisfaction with complaint handling remained low at 21.7%, demonstrating the importance of continuing to improve how complaints are handled and how learning is translated into better services for residents.
- 3.1.6 This report supports the objectives of the Brent Borough Plan 2023–27, particularly the priority of Prosperity and Stability in Brent. Effective complaint handling provides an important mechanism for identifying issues affecting residents' experience of their homes and neighbourhoods and supports the Council's commitment to providing safe, secure and decent housing.
- 3.1.7 It also supports the Borough Plan priority of Thriving Communities by ensuring that residents' experiences are heard and used to inform service improvement. The learning identified through complaints provides insight into where services are not meeting residents' expectations and helps Housing Management to identify and address recurring issues, improve communication and strengthen accountability.
- 3.1.8 As a registered provider of social housing, Brent Council is also required to demonstrate effective complaint handling and learning in line with the Housing

Ombudsman Complaint Handling Code and the regulatory framework for social housing. This report provides assurance on Housing Management's complaints performance during 2025/26 and sets out the actions being taken to use complaints to improve services.

3.2 Background

3.2.1 Brent Council Housing Management is a registered provider of social housing and is therefore subject to the Social Housing Regulation Act, Housing Ombudsman Complaint Handling Code and relevant Building Safety requirements. These include:

- submission of complaints related Tenant Satisfaction Measures;
- publication of complaints data for residents to scrutinise;
- publication of an annual complaints report;
- publication of a self-assessment against the Housing Ombudsman's Complaint Handling Code; and
- clear identification and monitoring of building safety related complaints.

3.2.2 To align with our duties as a registered provider of social housing and member of the Housing Ombudsman scheme, this report focuses on complaints received by or on behalf of Brent Council's tenants and leaseholders relating to landlord services delivered by, or on behalf of, Brent Housing Management. This includes services delivered through Housing Management and other Council services carrying out landlord functions, such as Estate Services and the Contact Centre, where these complaints fall within the jurisdiction of the Housing Ombudsman.

3.2.3 The Housing Management service currently manages 14,313 properties as part of its landlord service. Brent Council also has two housing companies, i4B Holdings (i4B) and First Wave Housing (FWH). These organisations will be reported on separately, as FWH is a separate Registered Provider.

3.2.4 Where data has been reported to the Regulator of Social Housing through the Tenant Satisfaction Measures (TSM) submission, this will be included in the report. This is tenant-only data and does not include our leaseholders. The report also highlights relevant resident insights from the TSMs.

Tenant Satisfaction Measure	2024/25	2025/26	Difference (+/-)
Satisfied with complaint handling	22.2%	21.7%	-0.5%
Satisfied listens to views and acts	39.2%	45.6%	+6.4%
Overall satisfaction with landlord services	51.3%	57.5%	+6.2%

- 3.2.5 The TSM results show an improvement in overall satisfaction with landlord services and in residents' perception that the Council listens to their views and acts on them. However, satisfaction with complaint handling remains low, highlighting the importance of the service improvement activity set out later in this report.

3.3 Data quality

- 3.3.1 An extensive data validation exercise was undertaken to ensure the robustness of the complaints data. This is the second year that this exercise has been required to verify cases relating to Housing Management. The Council has sought to verify all tenant and leaseholder complaints in line with regulatory reporting requirements.
- 3.3.2 Prior to 2024 reporting, the data only captured casework allocated to Housing Management Property and Neighbourhood teams on the complaints system. The Council has sought to replicate the methodology used in the 2024/25 report, where possible, to include complaints assigned to other Council directorates delivering landlord services, such as Estate Services and the Contact Centre.
- 3.3.3 As a result, comparisons with previous years may be affected by changes in the reporting methodology. Where appropriate, the report provides a consistent reporting boundary to enable meaningful comparison between years.
- 3.3.4 Data quality remains an area for improvement and will require system changes to improve the accuracy and efficiency of reporting, as elements of the current process remain highly manual.

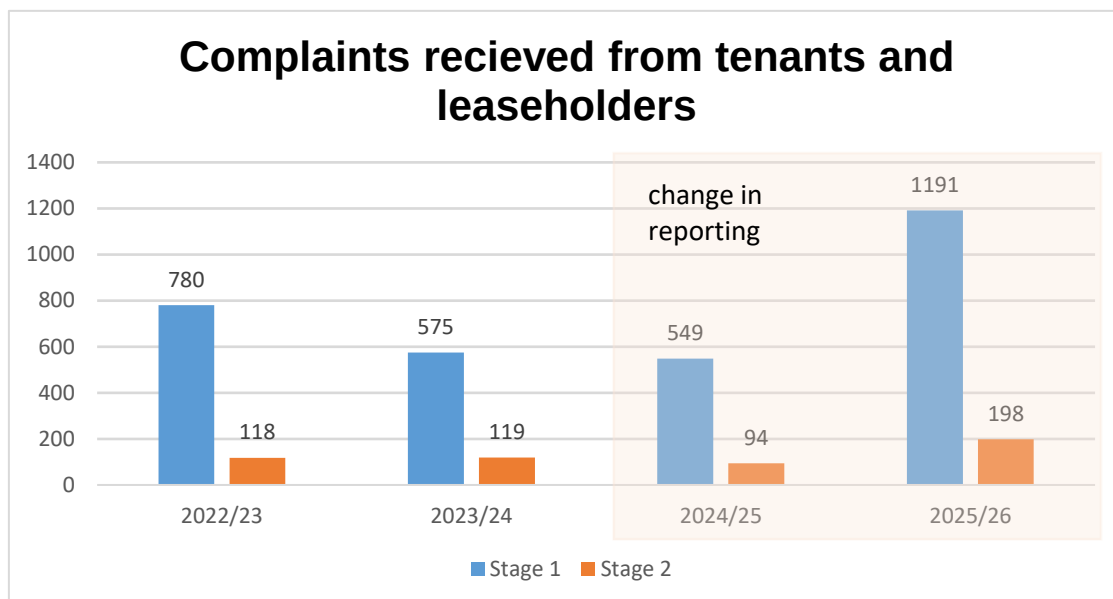
3.4 Complaints Performance

- 3.4.1. During 2025/26, Housing Management received 1,191 Stage 1 complaints, equivalent to 83.2 complaints per 1,000 homes, and 198 Stage 2 complaints, equivalent to 13.8 complaints per 1,000 homes. Stage 1 complaints increased by 642 (116.9%) compared with the previous year, while Stage 2 complaints increased by 104 (110.6%).

The key performance findings are:

- 76.9% of Stage 1 complaints were recorded as service failures, with delays accounting for the largest proportion of these cases.
- The most common reason for escalating a complaint to Stage 2 was disagreement with the Stage 1 response, accounting for 48.9% of escalations.
- £138,306 in compensation was paid across 449 complaints, compared with £109,787 across 353 complaints in 2024/25.

- Repairs remained the largest source of complaints, with delays and communication among the key issues identified.



- 3.4.2 The significant increase in complaint volumes should be considered in the context of changes to complaint recording and accessibility, as well as continued pressures across Housing Management services. In the past year there has been an internal focus on ensuring that matters that meet the definition of a complaint are recorded as complaints rather than service requests. This has been supported by reviews of information on the Council's webpages and communications to residents to improve awareness of how to make a complaint.
- 3.4.3 The increase in recorded complaints does not, on its own, indicate a deterioration in service performance. The outcome and root cause of complaints provide a more useful indication of where services are not meeting residents' expectations and where improvements are required.
- 3.4.4 A number of other factors are likely to have contributed to the increase in complaint volumes. The Complaints Service has observed that increased awareness amongst residents of their right to complain, alongside the increasing use of AI tools to prepare complaints and escalation requests, may be contributing to the increase in complaints being received across the Council.
- 3.4.5 The volume of complaints received was also significantly higher than anticipated, creating capacity pressures across both operational services and the Complaints Service. The Complaints Service manages complaints across the whole Council and has experienced increased demand across multiple service areas, not only Housing.
- 3.4.6 The sustained increase in demand has placed considerable pressure on the Council's ability to process and respond to complaints within the required

timescales. However, these factors provide context rather than an explanation for all the increase.

- 3.4.7 The escalation rate decreased from 18.1% in 2024/25 to 16.8% in 2025/26. The reasons for escalation and the implications for complaint handling are considered further later in this report.

3.5 Benchmarking

- 3.5.1 As most Councils had not published their 2025/26 annual complaints reports at the time of writing, full benchmarking against comparable landlords is not yet possible. However, the TSM data provides an indication of Brent's position against other London landlords:

	Complaints per 1,000 homes	Complaints per 1,000 homes
	Stage One	Stage Two
Brent	93.4	17.5
London Q3	114.98	30.95
London Median	89.85	22.9
London Q1	68.3	16.88

- 3.5.2 Brent's Stage 1 complaint rate of 93.4 complaints per 1,000 homes was slightly above the London median of 89.85, but below the upper quartile of 114.98. Brent's Stage 2 rate of 17.5 complaints per 1,000 homes was below the London median of 22.9 and close to the lower quartile of 16.88.
- 3.5.3 This indicates that, despite the significant increase in Brent's complaint volumes during 2025/26, Brent's complaint rates remain broadly within the range seen across London landlords. The relatively low Stage 2 rate also suggests that a smaller proportion of complaints progress to escalation compared with the London median.
- 3.5.4 The benchmarking should be treated as indicative rather than a direct measure of performance. The TSM comparison is based on tenant data only and does not include leaseholders. In addition, differences in how landlords record and manage complaints can affect complaint volumes and rates.

3.6 Timeliness of Responses

- 3.6.1 The Council's Complaints Policy requires complaints to be acknowledged within five working days. Corporate complaints will normally be responded to within 10 working days after acknowledgement at Stage 1 and 20 working days at Stage 2. Where required, these timescales can be extended by up to 10 working days at Stage 1 and 20 working days at Stage 2, with the complainant informed of the reasons for the extension and the expected response date.
- 3.6.2 The Council monitors complaint timeliness through its Tenant Satisfaction Measures (TSMs), which provide a consistent measure of residents' experience of the complaints process.

During 2025/26:

	Avg days to acknowledge	Avg days to respond	Compliance with Complaint Policy timescales (including permitted extensions)
Stage 1	3 days	10 days	84.4%
Stage 2	5 days	39 days	51.6%

3.6.3 Performance against the Council's Complaints Policy timescales was mixed during the reporting period. Stage 1 complaints were acknowledged within an average of 3 days and responded to within an average of 10 days, achieving an overall compliance rate of 84.4%, including permitted extensions. In contrast, Stage 2 complaints were acknowledged within an average of 5 days but took an average of 39 days to respond, resulting in compliance of 51.6%.

3.6.4 The reduction in Stage 2 performance reflects the unprecedented increase in complaint volumes experienced during the year. Complaint numbers have risen significantly due to a combination of factors, including improvements in complaint recording and accessibility, the use of AI to identify expressions of dissatisfaction and generate complaint referrals, and increased service demand within across the Council, including Housing. Additional pressures were also experienced during the mobilisation and embedding of the new Mears repairs contract, which contributed to higher levels of resident dissatisfaction and complaint activity. The sustained increase in volumes has placed significant pressure on both operational services and the Complaints Team, requiring the recruitment of additional temporary resources to support investigations and response handling. Despite these challenges, work continues to reduce the Stage 2 backlog, improve the timeliness of information provided by services, and strengthen complaint handling performance across the Council.

3.7 Nature and Reasons for Complaints

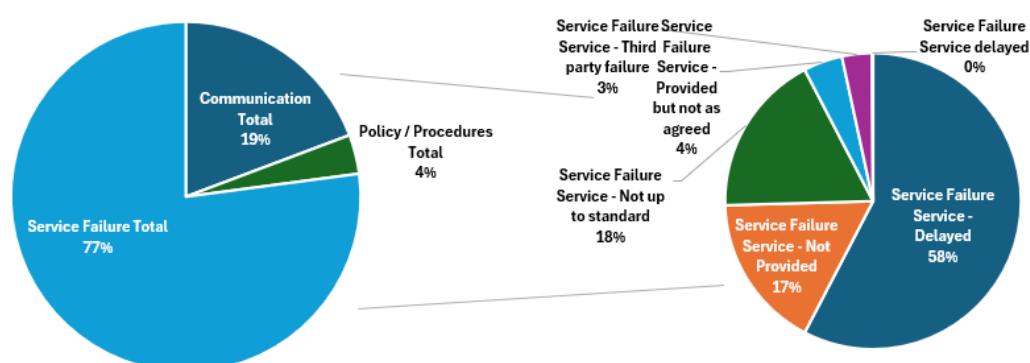
3.7.1 We record the root causes of complaints at Stage 1 once a complaint has been closed. The root cause analysis therefore relates to complaints closed during 2025/26.

3.7.2 The Council classifies root causes of complaints into three main categories: Communication, Policy/Procedures, and Service Failure. The confirmed data shows that Service Failure was the predominant root cause, accounting for 916 (76.9%) complaints where a root cause was recorded. Communication accounted for 229 complaints (19.2%), while Policy/Procedures accounted for 43 complaints (3.6%).

3.7.3 The breakdown of Service Failure cases shows that service delays are the main underlying issue, accounting for 528 complaints (58% of Service Failure cases). A further 163 complaints (18%) related to services not being delivered to the required standard, and 155 complaints (17%) related to services not being provided. The remaining Service Failure complaints related to services being

provided but not as agreed (39 complaints, 4%) and third-party service failures (30 complaints, 3%).

- 3.7.4 The analysis indicates that timeliness and consistency of service delivery are key factors contributing to resident dissatisfaction. The Service Failure breakdown is shown below.



- 3.7.5 While root-cause analysis identifies why complaints arise, issue-type analysis provides insight into the services generating the highest levels of complaint demand. Repairs continue to be the most significant area of dissatisfaction. The largest individual issue type was Repairs to My Property (Including Inspections), with 354 Stage 1 complaints (29.6%), followed by Outstanding Repairs - Other, with 139 complaints (11.7%), and Communal Repair, with 66 complaints (5.5%).
- 3.7.6 The root-cause data indicates that delays are the dominant underlying cause of complaints about service delivery. This suggests that improving the timeliness and management of the repairs service should remain a key area of focus, alongside ensuring that repairs are completed to the required standard. This is consistent with the wider complaints analysis, which identifies repairs as the largest single driver of complaints and delays as the most significant issue.
- 3.7.7 The root-cause analysis also shows that Service Failure was the predominant cause of repairs-related Stage 1 complaints, accounting for 552 of the 599 cases (92.2%). This reinforces the finding that improving the timeliness and quality of the repairs service should remain a key area of focus.
- 3.7.8 Communication is also a significant contributor to dissatisfaction (229 complaints). 75 related to customers not being kept informed or updated (6.4%), while a further 45 related to delays in contacting customers (3.8%). Other communication-related causes included third-party communication failures (33 complaints) and inaccurate information being provided or recorded (31 complaints).
- 3.7.9 This indicates that communication is a cross-cutting issue, which can exacerbate dissatisfaction where there is already a delay or other service

failure. Improving proactive communication therefore remains important, particularly where an underlying service issue cannot be resolved immediately.

3.7.10 Policy and procedure-related causes account for a smaller proportion of complaints, with 43 Stage 1 complaints attributed to this category. Although these represent a relatively small proportion of complaints, they remain important from a service improvement and governance perspective. Complaints in this category can indicate where responsibilities, processes or service expectations are not sufficiently clear to residents or staff. This learning is particularly relevant where several teams or services are involved in resolving a resident's issue

3.7.11 Overall, the analysis identifies three broad areas for continued improvement: timely service delivery, consistent delivery of services to the required standard, and proactive communication with residents. Repairs remain the largest source of complaints, while service delays represent the most significant underlying cause of dissatisfaction. These findings provide a clear evidence base for the service improvement activity set out in Section 4.0.

3.7.12 Stage 1

3.7.13 The table below shows the five most common Stage 1 issue types and the most frequent root cause associated with each. This provides further insight into where complaints are arising and the underlying reasons for resident dissatisfaction.

	Issue Type	Stage 1 complaints	Most common root cause
1	Repairs to my property	354 (30%)	Service delayed – 243
2	Housing Customer other	168 (14%)	Service delayed – 39
3	Outstanding repairs	139 (12%)	Service delayed – 76
4	Communal repair	66 (6%)	Service delayed – 38
5	Anti – Social Behaviour	61 (5%)	Service not provided – 10

3.7.14 The table reinforces the wider finding that delay is a recurring cause across several of the highest volume complaint areas, particularly repairs. It also highlights the need to improve the categorisation of complaints. The Housing Customer – Other category is relatively broad and provides limited information about the specific service that generated the complaint. Work is being done to improve the use of issue categories to enable the Council to identify more precisely where dissatisfaction is arising and target service improvement.

3.7.15 Stage 2

3.7.16 Stage 2 complaints show a different pattern because the root-cause information relates primarily to the reason for escalation rather than the original service issue. The five most common Stage 2 issue types and the most frequent reason for escalation are shown below.

	Issue type	Stage 2 complaints	Most common reason for escalation
1	Repairs to my property	55	Disagreed with Stage 1 decision (25)
2	Housing Customer other	30	Disagreed with Stage 1 decision (19)
3	Outstanding repairs	26	Stage 1 did not address issues in full (12)
4	Damp and/or mould	15	Disagreed with Stage 1 decision (8)
5	Anti-Social Behaviour	12	Stage 1 did not address issues in full (4)

3.7.17 Of the Stage 2 complaints for which a reason for escalation was recorded, 48.9% were escalated because the resident disagreed with the Stage 1 decision, while 12.1% related to follow-up actions not being completed. Disagreement with the Stage 1 decision has also been the most common reason for escalation over the past two years.

3.7.18 Looking at issue type, escalations most commonly related to repairs. The Council identifies five issue types as repairs-related: Repairs to My Property (Including Inspections), Outstanding Repairs - Other, Communal Repair, Complaints about Wates and Repairs to My Property. Together, these accounted for 599 (50.3%) Stage 1 complaints and 90 (45.5%) Stage 2 complaints during 2025/26, representing an escalation rate of 15%.

3.7.19 Overall, the analysis demonstrates a clear relationship between the services generating the highest volumes of complaints and the root causes recorded. Repairs remain the largest source of complaints at both stages, while service delays are the most common underlying cause of dissatisfaction. Communication also remains a significant cross-cutting issue, particularly where residents are not kept informed about delays or actions being taken. These findings provide a clear evidence base for the service improvement activity set out in Section 4.0.

3.8 Comparison with 2024/25

3.8.1 To allow for comparison with the previous year, only cases directly assigned to the substantive areas of the landlord service have been included in the table below. This provides a consistent basis for assessing changes in the volume of complaints and escalation rates.

	2024/25			2025/26		
	S1	S2	Esc. rate	S1	S2	Esc rate
Housing and Neighbourhoods	156	27	17.3%	346	63	18.2%
Housing Management Property	386	66	17.1%	740	119	16.1%

Overall	512	93	18.1%	1086	182	16.8%
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3.8.2 The table shows a significant increase in both Stage 1 and Stage 2 complaints across the substantive Housing Management service areas. Stage 1 complaints increased from 512 to 1,086, while Stage 2 complaints increased from 93 to 182. Despite this increase in complaint volumes, the overall escalation rate reduced from 18.1% in 2024/25 to 16.8% in 2025/26. Housing and Neighbourhoods experienced a small increase in escalation rate, from 17.3% to 18.2%, while Housing Management Property saw a reduction from 17.1% to 16.1%.

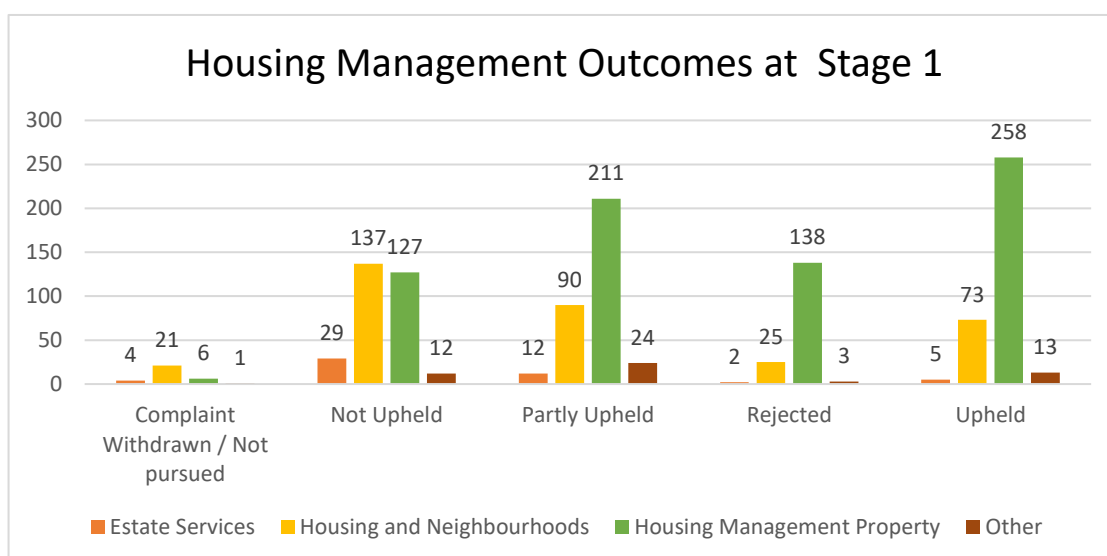
3.8.3 Although complaint volumes increased significantly, the escalation rate remained broadly consistent with the previous year. This indicates that the proportion of complaints progressing to Stage 2 changed relatively little despite the substantial increase in complaints received.

3.9 Complaint Outcomes

3.9.1 Complaint outcomes provide an indication of the extent to which investigations identify that the service provided did not meet the expected standard, as well as cases where the complaint was not upheld or was not appropriate for investigation through the complaints process.

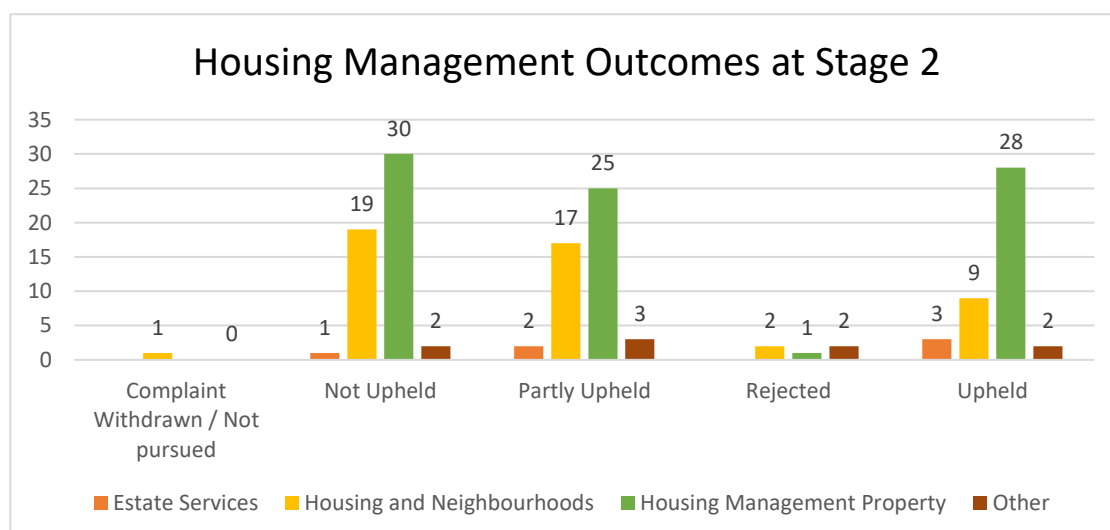
3.9.2 At Stage 1, 1191 complaints were received during 2025/26. Of these cases, 349 complaints were upheld and 337 were partly upheld. This means that complaints 686 (57.6%) were upheld or partly upheld.

3.9.3 A further 305 complaints were not upheld, while 168 were rejected and 32 were withdrawn or not pursued.



Note on the data: The Service Area 'Other' category includes Affordable Housing and Partnerships, Complaints, Customer Services and Assessments

- 3.9.4 The 57.6% uphold or partial uphold rate at Stage 1 indicates that complaints are identifying a significant level of service failure or dissatisfaction that is substantiated through the complaints investigation. While complaint volumes increased significantly during 2025/26, the outcome data suggests that complaints continue to identify genuine service issues, with more than half of all complaints investigated being upheld or partly upheld.
- 3.9.5 Of the 168 rejected Stage 1 complaints, the majority were rejected because the complaint was a duplicate request or had already been investigated. In 141 cases, this was recorded as the reason for rejection. This indicates that a significant proportion of rejected complaints did not represent new service failures requiring a further investigation through the complaints process. The findings also suggest that improvements are needed to identify duplicate complaints earlier in the process, reducing unnecessary administrative activity and enabling resources to focus on new complaints.
- 3.9.6 At Stage 2, 198 complaints were received during 2025/26. An outcome was recorded for 147 cases, with 51 cases having no outcome recorded as they were still open at the end of this reporting period. Of the cases with a recorded outcome, 42 were upheld and 47 were partly upheld, meaning that 89 cases (60.5%) were upheld or partly upheld.
- 3.9.7 A further 52 complaints were not upheld, five were rejected and one was withdrawn or not pursued.



Note on the data: 51 Stage 2 complaints were still under investigation at 31 March 2026 and therefore had not yet received a final outcome. These cases are excluded from the chart and outcome analysis. The Service Area 'Other' category includes Affordable Housing and Partnerships, Complaints, Customer Services and Assessments

- 3.9.8 The proportion of Stage 2 cases that were upheld or partly upheld (60.5% of cases with a recorded outcome) is higher than the Stage 1 rate of 57.6%. Disagreement with the Stage 1 decision is the most common reason for

escalation, suggesting that some residents remain dissatisfied with the original investigation outcome or proposed remedy.

3.9.9 The outcome data also highlights the importance of implementing remedies and agreed actions arising from complaints. Failure to complete follow-up actions can undermine confidence in the complaints process and is one of the recurring reasons residents escalate complaints to Stage 2.

3.9.10 Overall, the outcomes demonstrate that complaints remain an important source of evidence about service performance. More than half of complaints investigated at both Stage 1 and Stage 2 were upheld or partly upheld, indicating that complaint investigations continue to identify areas where services have not met expected standards.

3.10 Compensation

3.10.1 Compensation data provides an indication of the financial remedies provided to residents following complaints. The total number of cases in the table below refers only to cases where compensation was awarded.

	2024/25		Average per case	2025/26		Average per case
	Cases	Amount		Cases	Amount	
Stage 1	260	£60,897	£234	315	£81,485	£259
Stage 2	93	£48,890	£526	134	£56,821	£424
Total	353	£109,787	£311	449	£138,306	£308

Compensation comparison table

3.10.2 The Council paid a total of £138,306, in compensation for Housing Management complaints in the year 2025/26, comprising 449 cases. At Stage 1, compensation was awarded in 315 cases with a total of £81,485 compensation given overall. This only includes data for the cases that were closed at Stage 1.

3.10.3 The average compensation per case rose from £234 last year to £259 in 2025/26. Stage 2 involved 134 cases where £56,821 was awarded in compensation. The average compensation per case is lower than last year at Stage 2, falling from £526 to £424.

3.10.4 Overall compensation increased from £109,787 in 2024/25 to £138,306 in 2025/26, alongside an increase in the number of cases where compensation was awarded from 353 to 449. The reduction in the average Stage 2 payment, alongside the increase in Stage 1 compensation, may indicate that more complaints are being remedied at an earlier stage

3.10.5 The most frequently recorded reason for awarding compensation was delay or failure to provide a service. This accounted for 209 Stage 1 cases and 64 Stage 2 cases, representing 273 of the 449 cases (60.8%) where compensation was awarded across the two stages. When awarding compensation, we credit a

resident's rent account if they are in arrears, make direct payments to their bank or, if the amount awarded is under £500, compensation is awarded as a postal voucher to be claimed at any post office.

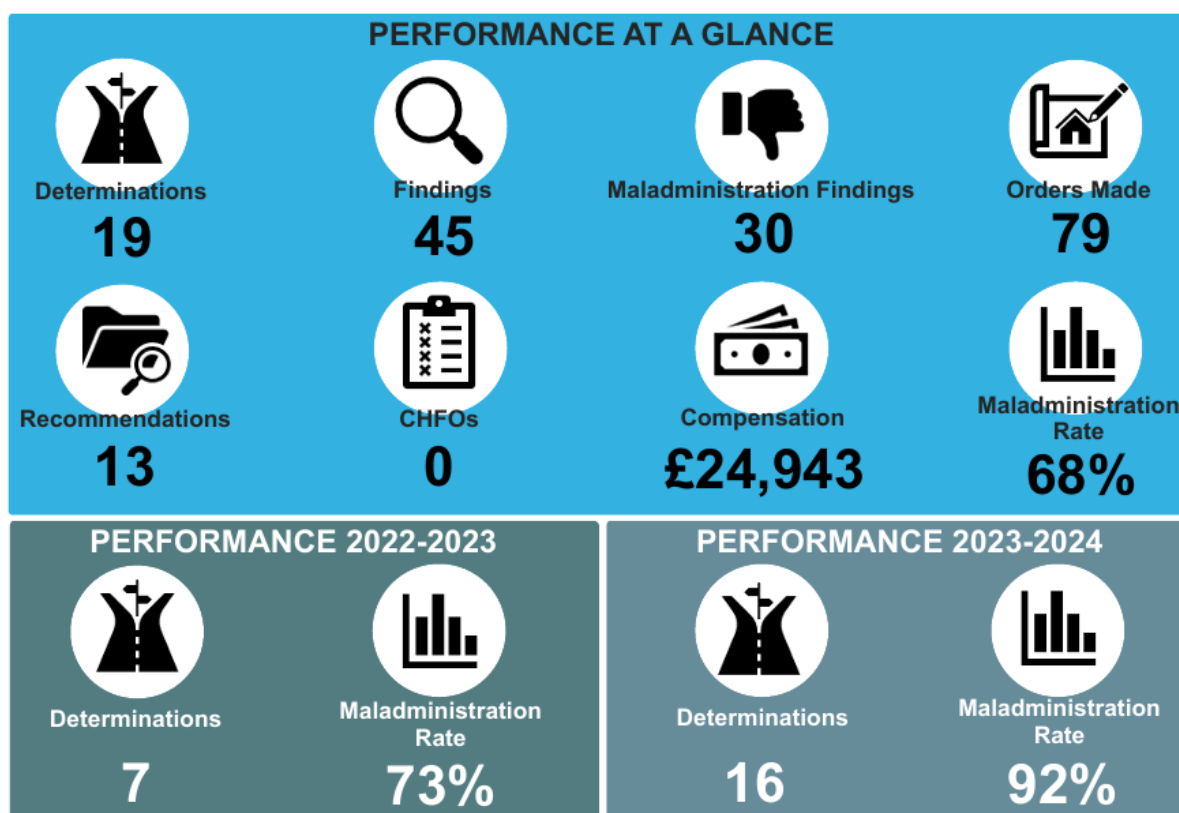
3.10.6 Compensation awarded by Brent Council is benchmarked against the Housing Ombudsman's remedies guidance.

3.11 Ombudsman Decisions in 2024/2025

3.11.1 The Housing Ombudsman has not yet published its annual landlord performance report for 2025/26. It is therefore not yet possible to report on Ombudsman determinations relating to cases referred during the 2025/26 financial year. The most recent available data covers cases determined between April 2024 and March 2025.

3.11.2 The Housing Ombudsman has asked landlords to include their 2024/25 performance information within their 2025/26 annual complaints reports. Brent's full Housing Ombudsman landlord performance report is included at Appendix 1.

3.11.3 The table below has been included from the 2024/25 report on the Housing Management Service's performance.



3.11.4 During 2024/25, the Housing Ombudsman made 19 determinations relating to Brent, resulting in 45 findings. Of these, 30 were findings of maladministration, giving Brent a maladministration rate of 68.2%. The determinations resulted in

79 orders and 13 recommendations. There were no Complaint Handling Failure Orders (CHFOs) and no findings of severe maladministration, which are positive outcomes.

- 3.11.5 Brent's maladministration rate improved significantly compared with 2023/24, when the rate was 92%. The 2024/25 rate of 68.2% remains above the national rate for landlords of a similar size and type, however, indicating that there remains scope to strengthen the quality and consistency of services and complaint handling.
- 3.11.6 The largest number of Ombudsman findings related to Property Condition (18 findings) and Complaints Handling (15 findings). Property Condition accounted for 65% maladministration findings, while Complaints Handling accounted for 87%. This reinforces the findings from Brent's internal complaints data, which identifies repairs as the largest source of dissatisfaction and delays in service delivery as a significant underlying cause.
- 3.11.7 Within Property Condition, 12 of the 18 findings related to responsive repairs involving leaks, damp and mould. Complaints Handling was the second largest category, with 15 findings, of which 10 were maladministration and three were service failures.
- 3.11.8 The Ombudsman issued 79 orders across 29 category findings. The most common orders related to compensation, repairs and taking specific action, with further orders for policy review, case review, apologies and staff training. Brent complied with 66 orders within three months (96%), with a further three orders completed within six months.
- 3.11.9 A total of £24,943 in compensation was ordered by the Housing Ombudsman during 2024/25. The largest proportion related to Property Condition, followed by Moving to a Property and Complaints Handling. Brent's own compensation arrangements are benchmarked against the Housing Ombudsman's remedies guidance.
- 3.11.10 Overall, the reduction in Brent's maladministration rate from 92% to 68.2%, alongside the absence of severe maladministration findings and Complaint Handling Failure Orders, indicates an improvement in Ombudsman performance. However, the volume of findings relating to property condition and complaints handling demonstrates that further improvement is required.

4.0 Learning from Complaints and Service Improvements

- 4.1 Complaints are an important source of insight to show us where things are going wrong and how we can improve the service to our residents
- 4.2 **Repairs**
 - 4.2.1 Housing Repairs continued to account for the largest proportion of complaints during the reporting period. This reflects a sustained trend and highlights the need for continued focus on repairs delivery and communication with residents.

4.2.2 Complaint investigations relating to repairs have identified several recurring themes requiring improvement, including:

- Improved recording of 'no access' visits
- Greater consistency needed between contractor records and Housing Ombudsman expectations
- Improved triaging at the first point of contact including correct Schedule of Rates (SOR) coding and repair priority setting
- The need for clearer communication with residents throughout the repairs process

4.2.3 Since the commencement of the responsive repairs and maintenance contracts with Wates and Mears in October 2025, complaint learning has been embedded within contract management arrangements. This includes:

- Weekly operational meetings to review live complaint cases and emerging issues
- Monthly performance meetings to analyse trends, performance concerns and complaints learning
- Increased scrutiny of contractor communication and record keeping
- Targeted engagement sessions and 'toolbox talks' with contractors to reinforce expectations around resident communication and appointment management

4.2.4 Due to an increased volume of complaints relating to pest infestation Property Services and Pest Control trialled joint treatment and proofing visits to reduce repeat appointments. Although the trial was not continued, it identified opportunities for closer working and highlighted the benefits of a more coordinated approach between the services.

4.2.5 Case Study – Improving Repairs Triaging

Driven by a rise in complaints linked to failures in triaging repairs issues e.g. incorrect SOR coding, Property Services has been conducting monthly interactive learning sessions with Customer Services where they have run morning sessions and invited different stakeholders to provide informal training on how repairs should be dealt with at first contact. Early improvements have been seen in repairs logging and escalation management.

4.3 **Policy Development**

4.3.1 Complaint investigations have highlighted occasions where responsibilities or service standards were not sufficiently clear. In response, Housing Management has accelerated the development and review of key housing

policies to strengthen governance and provide greater clarity for residents and staff.

4.3.2 Policies currently in development or review include:

- Damp and Mould
- Assignment & Succession
- Domestic Abuse
- Vulnerable Residents and Safeguarding
- Anti-Social Behaviour
- Hate Crime
- Repairs
- Rent Setting
- Rent Collection and Financial Inclusion
- Mechanical and Electrical Services; Gas Safety; Asbestos and Water Safety
- Fire Safety

4.3.3 The development of these policies has been informed by both complaint investigations and the experience of frontline staff responsible for handling complaints. This has helped ensure that recurring issues identified through complaints are reflected in policy development.

4.3.4 Case Study – Developing the Asbestos Policy

A Stage 2 complaint concerning the collapse of a bedroom ceiling and the subsequent decant of a family highlighted uncertainty regarding asbestos-related responsibilities and processes.

The complaint investigation identified the need for greater clarity around how asbestos issues are managed and communicated to residents. Learning from this complaint has informed the development of a dedicated Asbestos Policy, which will set out responsibilities and expectations for managing asbestos-related risks.

4.4 Improving Customer Communication

4.4.1 Communication continues to be one of the most common themes arising from complaint investigations. Residents frequently report that unclear or inconsistent information contributes to dissatisfaction and, in some cases, unnecessary escalation of complaints.

4.4.2 In response, Housing Management has prioritised improvements to customer communications. Recent actions include reviewing online information, ensuring webpages accurately reflect current policies and procedures, and introducing Plain English standards across customer correspondence.

4.4.3 For example, information relating to tenancy succession has been reviewed to ensure it aligns with the Council's Allocations Scheme following issues raised through complaints. Guidance relating to access to communal areas has also been reviewed to provide clearer information for residents.

4.4.4 The service has also introduced Plain English training to improve the accessibility and clarity of written communications.

4.4.5 Case Study - Find your ATM Tool & WhatsApp

Complaint investigations highlighted that some residents were unsure who their Area Tenancy Manager was or how to contact them. In response, Housing Management introduced an online "Find Your Area Tenancy Manager" tool enabling residents to identify the correct officer using their address. This has made it easier for residents to access support and obtain information at an earlier stage. In addition, WhatsApp communication channels have been established to provide easier access to information and updates on common housing issues.

4.4.6 With the introduction of a new dedicated Housing Communications resource, Housing Management will continue to strengthen resident-facing information and proactively review customer journeys to identify opportunities for improvement.

4.5 **Embedding Learning from Complaints**

4.5.1 The introduction of a new complaint case review tool in April 2025 has strengthened the Council's approach to organisational learning. During this reporting period five in-depth case reviews have been completed.

4.5.2 These reviews are a particularly useful tool in the Council where complex cases can straddle lots of service areas. They bring together representatives from all relevant service areas to map the customer journey. They help to identify root causes, where the service failures have occurred and agree actions to prevent similar issues from recurring. The approach has also received positive feedback from the Housing Ombudsman as an example of proactive learning from complaints.

4.5.3 Case reviews are now embedded within the complaints process and are initiated once the Council is notified that a complaint has been accepted for investigation by the Housing Ombudsman. This enables learning to begin at an early stage rather than waiting for the Ombudsman's final determination.

4.5.4 Training has also been delivered to Housing Support staff to strengthen understanding of the distinction between service requests and complaints. This has helped ensure residents are directed to the most appropriate process at the earliest opportunity and has reduced delays in complaints being logged and investigated.

4.5.5 In October 2025 a dedicated Housing Management complaints page went live. This provides residents with clearer information about how to access the complaints process. It also helps residents resolve straightforward enquiries without the need to submit a formal complaint.

4.5.6 Alongside this work, Housing Management has strengthened partnership working with other Council services where complaints involve multiple service

areas. This includes joint action planning with Adult Social Care to improve coordination in complex cases and ensure residents receive a more joined-up service.

- 4.5.7 Housing Management will continue to embed learning from complaints across services, ensuring that complaint outcomes are used to drive service improvements.
- 4.5.8 Complaints remain one of the Council's most valuable sources of feedback on the resident experience. The improvements outlined in this report demonstrate how Housing Management is using complaint investigations not only to resolve individual cases but also to identify strategic changes that can be made to improve outcomes for residents.

5.0 Financial Considerations

- 5.1 There are no relevant financial considerations arising from this report.

6.0 Legal Considerations

- 6.1 Under section 51 of the Housing Act 1996, the Housing Ombudsman Scheme is approved by the Secretary of State. Local housing authorities in England acting as registered providers of social housing must remain members of the scheme for their social housing management functions.
- 6.2 From 1 April 2024, the Housing Ombudsman's complaint handling code is a statutory requirement for social landlords. The code introduces timescales for acknowledging and dealing with complaints, as well as a requirement for a 2-stage complaints process.
- 6.3 Compliance with the Housing Ombudsman's Complaint Handling Code is a mandatory legal requirement for social landlords including local authority landlords pursuant to the provisions of the Social Housing (Regulation) Act 2023. This requires the Council to monitor, publish, and report its annual complaints performance and service improvements to its governing body, which for an authority with executive arrangements is Cabinet.
- 6.4 Failure to meet the statutory code or follow required complaint procedures exposes the local authority to formal Complaint Handling Failure Orders (CHFOs) issued by the Ombudsman in line with the Social Housing (Regulation) Act 2023. In addition, council must ensure adherence to the regulatory powers and enforcement mechanisms introduced by the Social Housing (Regulation) Act 2023 (SH(R)A 2023). From 20 September 2023, the Regulator of Social Housing (RSH) has been empowered to monitor performance metrics, compel the delivery of key performance information, and enforce compliance with consumer standards. This includes serving performance improvement plan notices, enforcement notices, and taking emergency remedial actions where necessary. The council must ensure that its housing management practices align with these standards to avoid

enforcement actions, which could include penalties or interventions in management.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 There are no direct Equality Act implications arising from the recommendations within this report.
- 7.2 The Council is committed to ensuring that all residents can access the complaints process. Reasonable adjustments are available in accordance with the Council's Vulnerable Residents and Reasonable Adjustments Policy.
- 7.3 Complaints can be submitted through a range of channels and in different formats. The Council also accepts complaints from authorised representatives acting on behalf of residents where appropriate.
- 7.4 Learning arising from complaints has informed improvements to customer communications, policy development and service delivery. This supports the Council's ongoing commitment to meeting its Public Sector Equality Duty obligations and ensuring services are accessible and responsive to the diverse needs of residents.

8.0 Climate Change and Environmental Considerations

- 8.1 The recommendations contained within this report do not have any direct climate change or environmental implications.

9.0 Communication Considerations

- 9.1 The Housing Ombudsman Complaint Handling Code requires landlords to publish an annual complaints performance and service improvement report and to make information about complaints performance accessible to residents.
- 9.2 Subject to approval, the report, Housing Ombudsman self-assessment and updated Complaints Policy will be published on the Council's website.
- 9.3 Learning arising from complaints and the service improvements identified within this report will continue to be shared with residents through online and printed communications, supporting transparency and demonstrating how resident feedback is used to improve services.

Report sign off:

Thomas Cattermole

Corporate Director Housing & Resident
Services

Legal considerations provided by:
Stephen Akpan, Senior Lawyer Civil
Litigation & Homelessness

Finance considerations provided by:
Martin Hone, Head of Finance

Housing
Ombudsman Service

LANDLORD PERFORMANCE REPORT

2024/2025

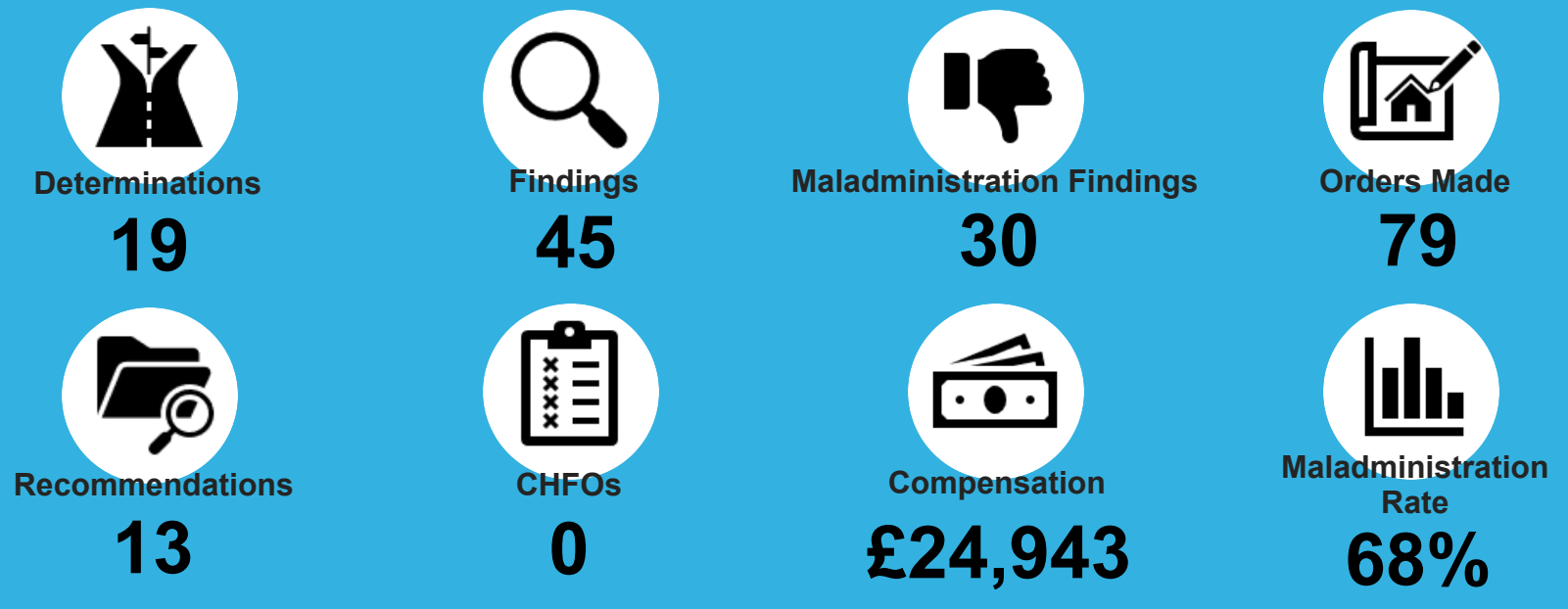
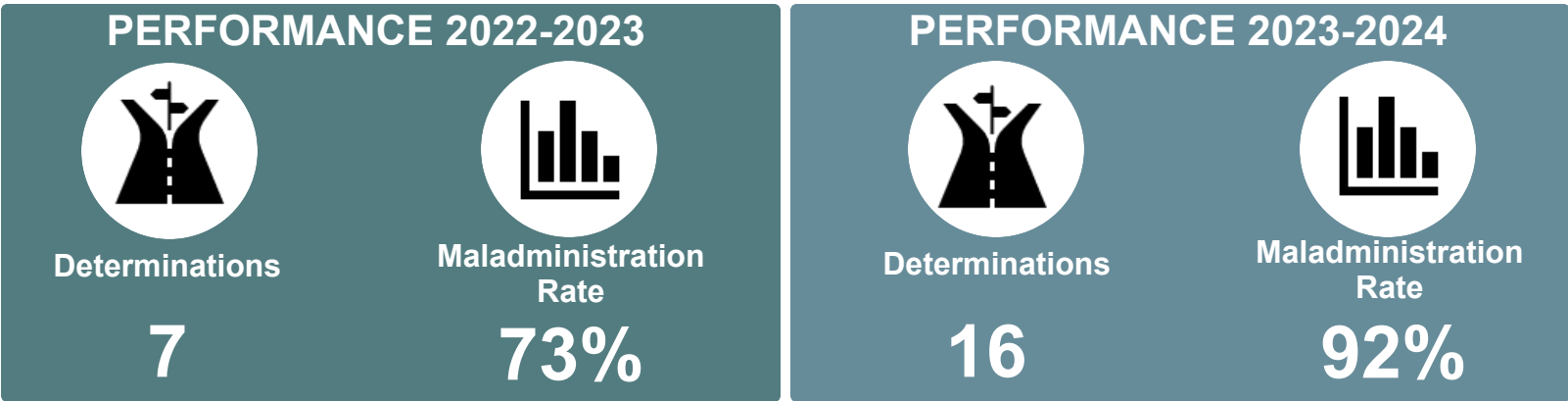
London Borough of Brent

London Borough of Brent

Landlord: London Borough of Brent

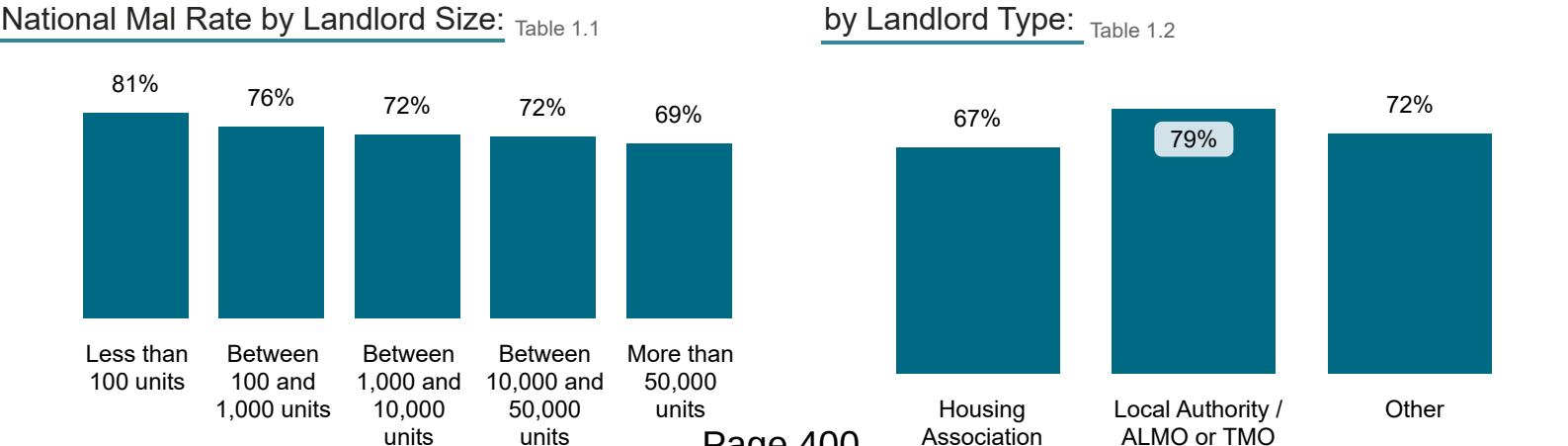
Landlord Homes: 11,903Landlord Type: Local Authority / ALMO or TMO

PERFORMANCE AT A GLANCE



Maladministration Rate **Comparison** | Cases determined between April 2024 - March 2025

NATIONAL MALADMINISTRATION RATE: 71%	National Maladministration rate for Landlords of a similar size <u>and</u> type: 80%
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Findings Outcome Comparison | Cases determined between April 2024 - March 2025

National Performance by Landlord Size: Table 2.1

Outcome	Less than 100 units	Between 100 and 1,000 units	Between 1,000 and 10,000 units	Between 10,000 and 50,000 units	More than 50,000 units	National	Landlord Findings
Severe Maladministration	5%	10%	5%	5%	4%	5%	7%
Maladministration	38%	36%	41%	41%	41%	41%	47%
Service failure	32%	24%	22%	22%	20%	21%	13%
Mediation	0%	0%	1%	2%	2%	2%	0%
Redress	3%	6%	10%	12%	17%	13%	24%
No maladministration	14%	17%	15%	13%	10%	13%	7%
Outside Jurisdiction	8%	7%	6%	6%	6%	6%	2%
Withdrawn	0%	0%	0%	0%	0%	0%	0%

National Performance by Landlord Type: Table 2.2

Outcome	Housing Association	Local Authority / ALMO or TMO	Other	National	Landlord Findings
Severe Maladministration	4%	6%	3%	5%	7%
Maladministration	39%	45%	35%	41%	47%
Service failure	21%	22%	27%	21%	13%
Mediation	2%	1%	1%	2%	0%
Redress	16%	7%	10%	13%	24%
No maladministration	13%	11%	15%	13%	7%
Outside Jurisdiction	5%	7%	8%	6%	2%
Withdrawn	0%	0%	0%	0%	0%

Landlord Findings by Category | Cases determined between April 2024 - March 2025

Table 2.3

Category	Severe Maladministration	Maladministration	Service failure	Mediation	Redress	No maladministration	Outside Jurisdiction	Withdrawn	Total
Property Condition	3	8	0	0	6	0	1	0	18
Complaints Handling	0	10	3	0	1	1	0	0	15
Anti-Social Behaviour	0	1	1	0	1	1	0	0	4
Information and data management	0	2	1	0	1	0	0	0	4
Charges	0	0	1	0	0	0	0	0	1
Estate Management	0	0	0	0	0	1	0	0	1
Moving to a Property	0	0	0	0	1	0	0	0	1
Occupancy Rights	0	0	0	0	1	0	0	0	1
Total	3	21	6	0	11	3	1	0	45

Findings by Category Comparison | Cases determined between April 2024 - March 2025

Top Categories for London Borough of Brent

Table 3.1

Category	# Landlord Findings	% Landlord Maladministration	% National Maladministration
Property Condition	17	65%	73%
Complaints Handling	15	87%	77%
Anti-Social Behaviour	4	50%	66%
Information and data management	4	75%	90%

National Maladministration Rate by Landlord Size:

Table 3.2

Category	Less than 100 units	Between 100 and 1,000 units	Between 1,000 and 10,000 units	Between 10,000 and 50,000 units	More than 50,000 units	% Landlord Maladministration
Anti-Social Behaviour	100%	71%	70%	61%	70%	50%
Complaints Handling	100%	86%	84%	81%	70%	87%
Information and data management	50%	100%	89%	89%	92%	75%
Property Condition	65%	79%	73%	74%	72%	65%

National Maladministration Rate by Landlord Type:

Table 3.3

Category	Housing Association	Local Authority / ALMO or TMO	Other	% Landlord Maladministration
Anti-Social Behaviour	63%	71%	79%	50%
Complaints Handling	72%	87%	86%	87%
Information and data management	87%	94%	100%	75%
Property Condition	70%	79%	68%	65%

Findings by Sub-Category | Cases Determined between April 2024 - March 2025

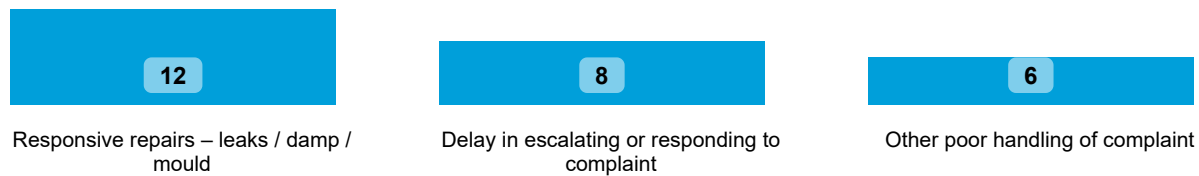
Table 3.4

Highlighted Service Delivery Sub-Categories only:

Sub-Category	Severe Maladministration	Maladministration	Service failure	Mediation	Redress	No maladministration	Outside Jurisdiction	Withdrawn	Total
Responsive repairs – leaks / damp / mould	3	5	0	0	4	0	0	0	12
Responsive repairs - general	0	2	0	0	2	0	1	0	5
Total	3	7	0	0	6	0	1	0	17

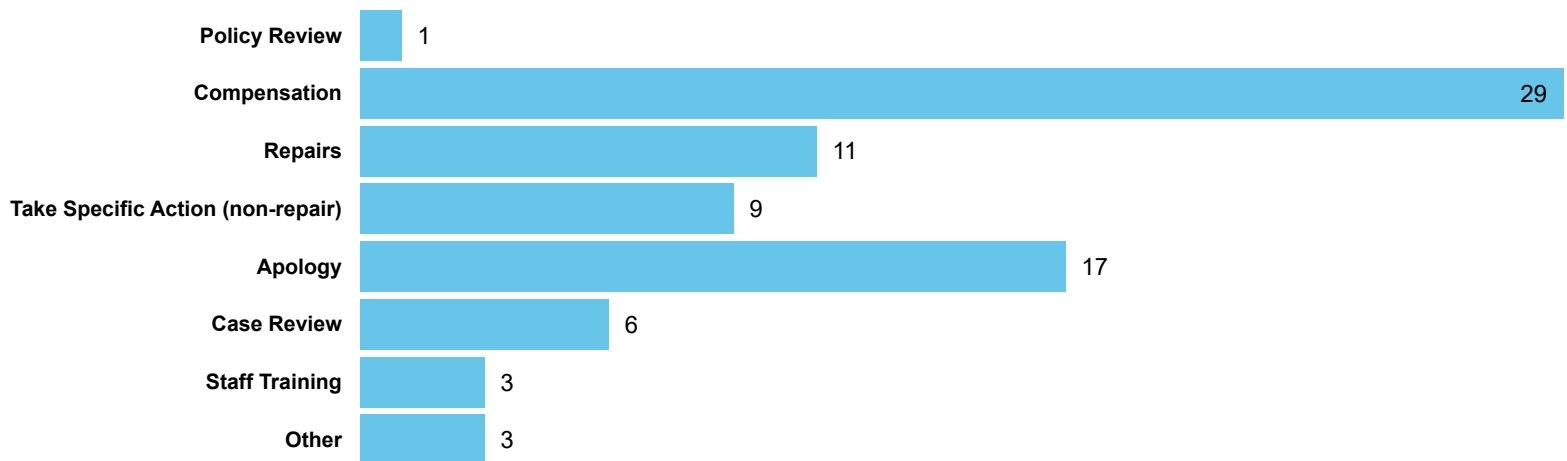
Top Sub-Categories | Cases determined between April 2024 - March 2025

Table 3.5



Orders Made by Type | Orders on cases determined between April 2024 - March 2025

Table 4.1



Order Compliance | Order target dates between April 2024 - March 2025

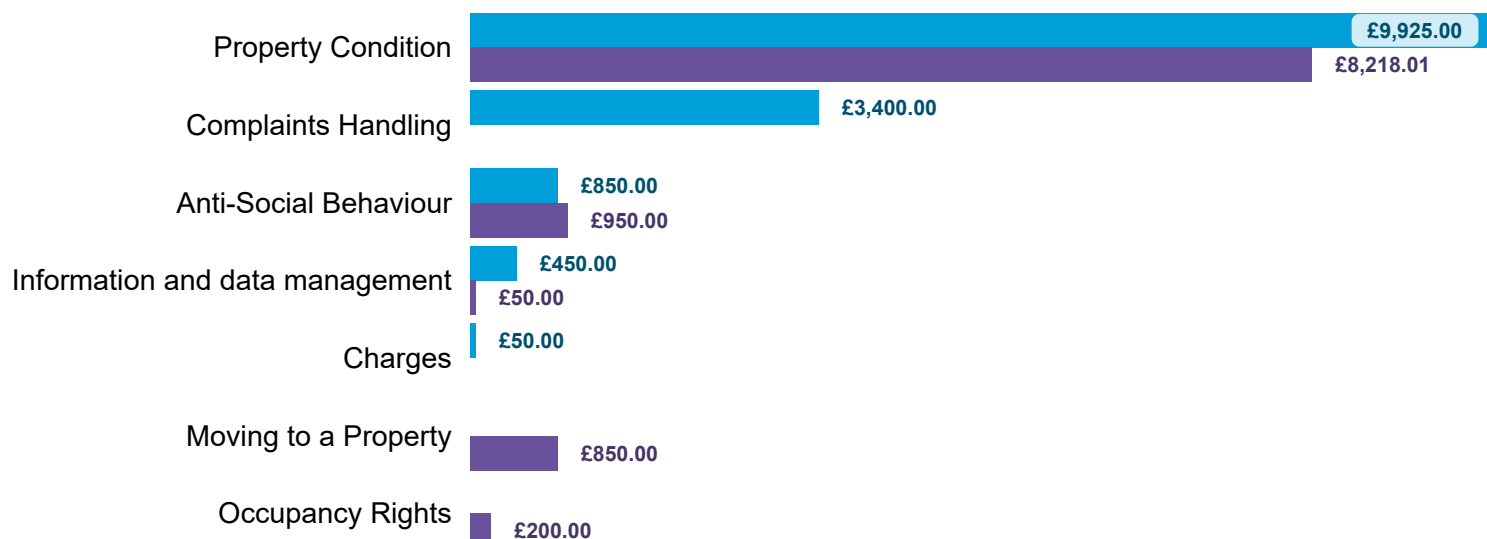
Table 4.2

Order	Within 3 Months		Within 6 Months	
Complete?	Count	%	Count	%
Complied	66	96%	3	4%
Total	66	96%	3	4%

Compensation Ordered | Cases Determined between April 2024 - March 2025

Table 5.1

● Ordered ● Recommended



Introduction | *Notes on your figures in this report*

The Housing Ombudsman's 2024-25 landlord reports are for landlords with 5 or more findings made in cases determined between 1 April 2024 and 31 March 2025.

The data comes from our casework management system. The reports include statistics on cases determined in the period. If we published a performance report for the landlord last year, then its individual report will also include limited statistics about cases determined between 1 April 2022 and 31 March 2024 for year-on-year comparison. Where a landlord has merged, we have merged the 2022-24 data and it may therefore be different to the published figures last year.

Determinations | *Cases Determined*

The number of cases determined (decided upon) for this landlord by the Ombudsman. 20 determinations were recorded for London Borough of Brent, this includes OSJ and Withdrawn determinations. 19 determinations were made excluding OSJ and Withdrawn.

In this report we are only counting the determinations excluding OSJ and Withdrawn overall - this is a change from previous years to where we counted all Determinations. We have also adjusted the determined figures for 22/23 and 23/24 referenced on the first page of this report to exclude OSJ and Withdrawn so that it is comparable. This means these figures may not match the published reports for those years.

Findings | *Category Findings*

The number of findings on cases determined. Each category on a determined case has one finding. When we count findings, we exclude any cases where the entire case was declared outside our jurisdiction (OSJ) or all elements of the complaint were entirely Withdrawn, usually prior to the case being allocated for investigation.

On this basis, we are only counting the findings made in the 19 determinations. 45 findings were recorded for London Borough of Brent in these 19 determinations.

Maladministration Rate | *Calculated from Category Findings*

Under our Scheme, maladministration includes findings of severe maladministration, maladministration and service failure. The number of findings of maladministration are expressed as a percentage of the total number of findings (excluding findings of 'outside jurisdiction' and 'withdrawn'). This is referred to as 'mal rate'.

The number of findings recorded for London Borough of Brent to calculate the Maladministration rate is 44. This excludes the 1 findings of Outside Jurisdiction or where elements of the case were Withdrawn during our investigation, but we made other findings on the case.

The number of 'Mal' findings recorded for London Borough of Brent is 30, which gives the Maladministration rate of 68.2% (30 / 44). The national Mal rate is calculated on the same basis and is comparable to previous reports.

Orders | *Calculated from Orders issued on Cases Determined*

We issue Orders when the case investigation has resulted in a category finding of some level of maladministration or mediation. They are intended to put things right for the resident. We can issue multiple orders for each category of a case, so if we issue compensation of £50 for one category, and £50 for another category - we will count this as two orders even though the Landlord may just see it as one order of £100 compensation for the case.

The number of orders recorded for London Borough of Brent is 79, these orders are across 29 category findings.

Unit Numbers | *Homes owned by the Landlord*

The number of homes (or 'units') owned or managed by the member landlord under the Housing Ombudsman Service's jurisdiction as of 31 March 2024. This is based on information available from the Regulator of Social Housing and provided by landlords.

Reviews | *Determination reviews*

The Landlords and residents may request a review of our determinations in circumstances set out in the Housing Ombudsman Scheme. This report includes data on cases originally determined between 1 April 2024 and 31 March 2025. If a determination is changed at review and the revised determination is issued on or before 31 March, the revised decision is included in the data. If the revised determination is issued on or after 1 April, only the original determination is included in the data.

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Complaint Policy (Under point 3.1)	The definition in the Complaints Policy reads: "A complaint is defined as an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual or several individuals." The reference to residents has been removed as anyone can make a complaint, not just residents.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Complaint Policy (Under point 3.1 & 3.2)	Residents do not have to use the word complaint for it to be treated as one and a complaint submitted via a third party or representative is handled in line with the Council's complaints policy. As per the policy and definition above, a complaint could be made about the following: <ul style="list-style-type: none"> • Delay in taking action without good reason • Failure to provide a service • Mistakes in the way a decision was taken • Not following the law or the Council's own rules • Broken promises

				<ul style="list-style-type: none"> • Giving incorrect or misleading information • Bias or discrimination • Rude, unhelpful or inappropriate behaviour by staff • Poor communication <p>Complaint training provided to staff also reiterates that residents do not have to use the word 'complaint' for it to be treated as such.</p>
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Complaint Policy (Under point 3.1)	The Council recognises the difference between a complaint and a service request. It mentions in its Complaints Policy, "it may be that the issues does not fall within the category of a complaint and is more appropriately dealt via a different route such as a service request. This can include instances where a customer is 'complaining' about a problem that the Council has not created, such as neighbour noise nuisance. The same can be true for a 'complaint' received to report a repair request. These are requests to the Council for appropriate action to be taken."
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their	Yes	Complaint Policy (Under point 3.1)	The Council will log a complaint where the complainant is not happy with the way in which their service request/s has/have been handled. The Council will continue to take action on the requests raised whilst the complaint is being investigated.

	efforts to address the service request if the resident complains.			
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Awareness of complaints process in tenant satisfaction surveys	The Council will outline where appropriate, how a resident can raise a complaint should they express dissatisfaction through a survey or any other feedback mechanism. We will include in our tenant satisfaction surveys information on how residents can pursue any dissatisfaction with the service they have received through the complaints process.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Complaint Policy (Under point 8.1)	The Council accepts all complaints unless there is a valid reason not to, including where it falls within Appendix 1 of the Complaints Policy.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and	Yes	Complaint Policy (Under point 3.4)	The Complaints Policy clearly outlines what can and cannot be considered under the Council's complaints process. The circumstances are fair and reasonable and in line with Housing Ombudsman guidance.

	<p>reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 			
2.3	<p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	Yes	<p>Complaint Policy</p> <p>(Under point 3.4)</p>	<p>The Council will “accept complaints made within 12 months of the issue occurring or the individual being made aware of the issue, unless excluded on other grounds such as the ones outlined in section 8.1. The Council will not normally accept a complaint where the customer has delayed raising the complaint with the Council by more than 12 months. The Council recommends that contact is made as soon as possible, to ensure access to data is readily available. Complaints exceeding 12 months will be considered on a case by case basis.” There may be occasions where the Council will apply discretion to investigate complaints which exceed the 12 months period.</p>
2.4	<p>If a landlord decides not to accept a complaint, an explanation must be provided</p>	Yes	<p>Complaint Policy</p>	<p>If a complaint is not to be considered, the resident will still receive a response</p>

	to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.		(Under point 3.4)	detailing reasons why the complaint cannot be considered and the response will include escalation rights.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaint Policy (Under point 3.4)	The Council will consider complaints exceeding 12 months on a case by case basis. This is noted in the Complaints Policy. We also have a Vexatious Complaints Policy which we follow but this again will consider individual circumstances of the case.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Complaint Policy (Under point 3.3)	Complaints can be raised via email, in person, by telephone or using the online form or portal. They can also be submitted via a Councillor or directly to officers if the resident asks for an issue to be processed through the complaints process. We accept all forms of communication including verbal, written or online. The Council is committed to ensuring that all residents can access its services and are

				<p>not disadvantaged in any way. Below are some of the adjustments that can be offered which are outlined in the Council's Complaints Policy:</p> <ul style="list-style-type: none"> • use of email or telephone in preference to hard copy letters • use of plain English or Easy Read service on our website • communication through a representative or intermediary • rest or comfort breaks in meetings • provision of information in appropriate alternative formats (eg. large print, Braille, coloured paper etc.) • provision of auxiliary aids <p>The Equality Act 2010 introduced the Public Sector Equality Duty (PSED) which the Council considers when carrying out day-to-day functions, crafting policies and delivering services. All staff undertake equality and diversity training, which is part of the Council's essential training programme. The Council's Equality, Diversity and Inclusion Strategy 2024-2028 – tackles how not just in terms of physical access but also looking at how residents and customers are able to interact with us and access services/support based on, for example, our</p>
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				use of language in corporate materials. One of its key aims is “Inclusion: Accessibility and cohesion”, this includes the provision of accessible and responsive services to cater for the diverse needs of our communities.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Complaints are accepted in person, on the phone, via email and social media channels	Officers within the Council are made aware of the complaints process. Services know how to log their own complaints and there is a corporate team within the Council to offer assistance and provide training. The Housing Department have a dedicated team who log all housing complaints.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	We provide this narrative in our Annual Complaints Report	The Council welcomes complaints as a way of learning and agrees that the number of complaints is not indicative of a high number of issues within the borough, it can demonstrate awareness of the complaints process. We champion different metrics e.g. reducing number of escalated and upheld complaints, as opposed to lowering volumes
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord’s website.	Yes	Complaint Policy (Under point 7.1)	Our complaint policy is available on the Council’s website in a clear and accessible format for all residents. The policy is available with voiceover, and can be translated from the toolbar in a number of languages, viewed using screen mask or with enlarged text. The policy explains the complaint stages, what will happen at each stage, and timeframes for a response. The policy also explains “The Council will

				consider and try to accommodate as far as possible any requests to provide the policy and any other relevant documents in an accessible format.” We also have a Housing specific complaint webpage to make it clearer for our residents.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Complaint Policy (Under point 7)	<p>The Complaints Policy explains how we publicise details of the policy, contains information on the Housing Ombudsman and the Code. A copy of the Council’s self-assessment of the code and the Code itself is all publicised on the Council’s complaints webpages. Our final review complaint responses also signpost residents to the Housing Ombudsman should they remain dissatisfied.</p> <p>The Housing Management Service will include in regular correspondence (leaflets, posters, newsletters) details of the Housing Ombudsman and Complaints Handling Code as well as the Complaints Policy. The Housing Management Service will also be providing information on notice boards within Council blocks, and at Resident Associations.</p>
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to	Yes	Complaint Policy (Under point 3.2)	The Council accept complaints from advocates, a representative or family member as long as consent from the complainant has been provided. Where

	be represented or accompanied at any meeting with the landlord.			reasonable they are also able to attend any meetings.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Complaint Policy (Under point 3.7)	Contact details for the Housing Ombudsman are available on the Council's webpages and a direct link to the Ombudsman website is also provided. The Complaints Policy details a complainant's right to access the Housing Ombudsman Service throughout their complaint. Our final review complaint responses also signpost residents to the Housing Ombudsman should they remain dissatisfied.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	We have a Corporate Complaints team who report to the governing body.	The Housing Management Service have a dedicated support team and a Complaints Officer managing complaints. In addition, our principal repairs contractor has a dedicated complaints officer and we have weekly complaints meetings to address lessons learnt from complaints and work on next steps. The Council also have a corporate complaints team that monitor and track all complaints received by the Council. The corporate complaints team

				compile complaint reports to Cabinet on a yearly basis.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	The Corporate Complaints team interact with staff at all levels and have the authority and autonomy to resolve complaints. The team also hold a compensation budget for stage 2 complaints	All complaint handlers receive training on dealing with complaints and complainants. They have autonomy to resolve complaints and approve lower level compensation payments. There is also direct access to senior staff to facilitate quick resolution and approve higher level payments or complex remedies.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Complaint Handling training is provided to officers	All relevant staff are suitably trained to handle complaints. Services are reasonable resourced to handle complaints, and we have a corporate complaints team which is a core service that delivers refresher training sessions for staff across the Council. We have implemented a new ombudsman review tool to review how we learn from complaint failures.

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Complaint Policy	The Council has one single Policy for dealing with complaints which details all the necessary information in regards to the management of complaints. All complainants are treated fairly and in line

				with the policy. They are not treated adversely if they complain.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Complaint Policy	The Council has one single complaints process which has two stages. The policy outlines how complaints will be dealt with.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Complaint Policy	The Council operates a two-stage complaint process.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	We have agreements in place with contractors in relation to complaints handling	We ask any third parties to whom we have delegated complaint handling to respond at stage 1 of the process and if the complainant remains dissatisfied they have a right to escalate to stage 2 in which the Council will investigate and respond.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	This is included in our third-party agreements	We provide third parties with the process which they must follow and ask that they handle complaints in line with the Code. We also hold regular meetings with our contractors to discuss volumes and complaints handling.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out	Yes	Complaint Policy	Complaint acknowledgements include a brief summary of the area of complaint and

	their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.		(Under point 3.5) Complaint acknowledgements have been updated to reflect this	officers dealing with the complaint will promptly contact the complainant to request clarification if any aspect of their complaint is unclear or should the outcome the resident is seeking also not be clear. This has been explained in the policy “complaints are logged, defined and acknowledged within 5 working days of the complaint being received. The acknowledgement will include our understanding of the complaint, the outcomes that are being sought, which aspects the Council is or isn’t responsible for and if there are any aspects that are unclear clarification will be sought.”
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	Complaint Policy (Under point 3.5) Complaint acknowledgements have been updates to reflect this	Complaint acknowledgements make clear what aspects of the complaint are to be investigated and confirm any aspects that fall outside of the policy or aspects for which we are not responsible. This has been explained in the policy “complaints are logged, defined and acknowledged within 5 working days of the complaint being received. The acknowledgement will include our understanding of the complaint, the outcomes that are being sought, which aspects the Council is or isn’t responsible

				for and if there are any aspects that are unclear clarification will be sought.”
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	<p>Complaint Policy</p> <p>(Under point 3.5)</p>	<p>All complaint handlers receive relevant training on complaints handling to conform to the points listed. There is also guidance on the Council’s intranet pages to reinforce these points to officers. Annual Data Protection training is also a mandatory training requirement for all officers. If a complaint concerns a particular individual it is assigned to their line manager. The Corporate Complaints team investigate stage 2 complaints independently of the service about which a complaint has been made.</p>
5.9	<p>Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.</p>	Yes	<p>Complaint Policy</p> <p>(Under point 3.6)</p>	<p>Where reasonable, officers will keep residents updated with the progress of their investigation. Complainants are informed in advance on the rare occasions when there will be a delay in responding and will agree on regular updates until a full response is provided. The policy states “On occasions where additional time is required beyond the extended timescales noted above (more than 20 days from stage 1 acknowledgement or more than 40 days of the complaint being acknowledged at stage 2) the investigator will agree with the complainant suitable intervals for being updated on their complaint.”</p>

5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	Complaint Policy (Under point 3.2)	The Council makes reasonable adjustments for residents where appropriate. The Complaints Policy provides examples of some of the reasonable adjustments that can be made. Residents can indicate when raising a complaint whether they have any disabilities or require any adjustments. This information is then recorded on their complaint record.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	Complaint Policy (Under point 3.5)	The Council does not refuse to escalate a complaint through its complaints procedure unless there is a valid reason. Reasons why a complaint may not be escalated are stipulated in the Council's Complaints Policy. A response will be provided to the resident outlining why we will not escalate the complaint.
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	This is all contained within the Council's case management system and can be downloaded	All records of the complaint are logged on the Council's case management system. This includes dates of complaint receipt and responses, relevant correspondence and documentation, and details of any compensation and corrective actions/service improvements and outcomes. Corrective actions and service improvements are separately monitored by the service to ensure actions are carried out. We also record issue types and root causes of complaints.

5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Officers handling complaints have the autonomy to suggest and implement appropriate remedies at any stage of the complaints process	We do our best to resolve a complaint at the first point of contact. We consider the issues and after full consideration will propose a reasonable solution. Any immediate actions will be taken as soon as possible.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Vexatious Complaints Policy 2023	The Council's Vexatious Complaints Policy provides procedures on how to manage unacceptable behaviour from residents and/or their representatives when pursuing a complaint. When a person is restricted we keep all evidence in a folder and a reason for restriction is provided in our restriction letter. We have a review period for restrictions. The Council are working on a Council-wide unreasonable behaviour policy
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	Vexatious Complaints Policy 2023	Restrictions placed following unacceptable complainant behaviour and managed through the Vexatious Complaints Policy consider the Equality Act 2010 and impact on individual complainants. Only necessary restrictions are applied relating to specific issues. We always allow residents in these circumstances to access Council services more generally. We also have review periods for restrictions. The Council are working on a Council-wide unreasonable behaviour policy.

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Complaint Policy (Under point 3.5)	The Council will aim to respond to complaints as early as possible and specifically where there are any risks or vulnerabilities involved and the issue is current/live as well as if the complaint raises something urgent, like an outstanding repair, we will seek to progress that as soon as possible, at the same time as pursuing a complaint investigation. Where the complaint relates to historic issues or is complex these may take longer to investigate.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	Complaint Policy (Under point 3.5)	The Council logs and acknowledges all stage 1 complaints within 5 working days. This is also stipulated in our Complaints Policy.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Complaint Policy (Under point 3.6)	Where the Council requires more time to investigate the issues and provide a response, an email is sent to the resident explaining the reason for the extension and providing a new deadline date which does not exceed 10 working days.
6.4	Landlords must decide whether an extension to this timescale is needed when considering	Yes	Complaint Policy	Where the Council requires more time to investigate the issues and provide a

	the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.		(Under point 3.6)	response, an email is sent to the resident explaining the reason for the extension and providing a new deadline date which does not exceed 10 working days.
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Email acknowledgements have been updated to reflect this.	When we request for an extension of the timescales in our email to the complainant we will include details of the Ombudsman.
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Complaint Policy (Under 3.7)	A complaint response is provided once an investigation has been completed and no later than the maximum timescale outlined in the Complaints Policy. Any actions required following the investigation will be logged with a timescale and tracked until completion on the Council's complaints system. This is explained in the policy "Complaints will normally be closed once an investigation has been completed and a response has been provided to the complainant. If there any outstanding actions following a complaint response at any stage, these are logged on to the Council's complaint system with an agreed timescale and tracked to completion. Updates on these outstanding actions will be provided to the complainant."

6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	The Council has a template letter which officers need to follow when responding to complaints to ensure a thorough response is provided	The Council addresses all points raised in the complaint, clearly providing reasons for decisions, and referencing any relevant law/good practice.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	Complaint Policy (Under point 3.6)	Where additional complaints are raised during the investigation, these will be incorporated if relevant and if the response has not yet been issued. If the issues require significant time to be looked into and would delay the response, a new complaint will be logged, or new timescale will be agreed with both parties. This is stipulated in the policy "If additional related information or complaints are provided during the course of the investigation, the Council will incorporate them into the stage 1 response if the response has not yet been issued, however we may need to extend the response time to consider the new information. It is therefore important that all supporting information is provided at the time the complaint is lodged. Any new issues will be logged as a new complaint if the stage 1 has already been issued, the issues are unrelated, or it would unreasonably delay the response."

6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	The Council has a template letter which officers need to follow when responding to complaints to ensure all points are covered.	The Council has a template available for officers to use so that all the points (a-g) are addressed within the response.
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Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	<p>Complaint Policy</p> <p>(Under point 3.5)</p> <p>We have a two-stage process, and escalation details are provided in all stage 1 responses.</p>	All stage 1 complaints inform complainants that if they remain dissatisfied, they can escalate their complaint to stage 2 and details are provided of how they can do this. This is also explained in the policy at section 3.5 "the complaint can be progressed directly to stage 2, if all or part of the complaint is not resolved to the complainant's satisfaction. Details of how complainants can escalate their complaints

				to stage 2 will be contained in the stage 1 response.”
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	All stage 2 complaints are acknowledged, defined and logged within 5 working days as per the Complaints Policy	All stage 2 complaints are defined and acknowledged within 5 working days of receipt. This is explained in the policy.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	Officers make reasonable enquiries to determine what points are outstanding.	The Council will make reasonable efforts to understand why complainants remain unhappy, however, if it is not clear we will ask the complainant for clarification so that we can ensure we address all the issues they remain unhappy with and avoid any misunderstanding. The policy explains that “although not a requirement we ask that they clearly state what parts of their complaint have not been addressed satisfactorily and the reasons why so that the investigator can focus the investigation and identify the aspects of the stage 1 that did not sufficiently remedy the complaint and for any outstanding points to be addressed in the stage 2 response.”
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaint Policy (Under point 3.5)	All stage 2 responses are investigated by the Corporate Complaints team who are independent of the service area and officer who has responded at stage 1. Corporate directors review and decide stage 2 complaints. If they are unavailable, this is

				delegated to a director to approve and sign off.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Complaint Policy (Under point 3.6)	The Council aims to respond to all stage 2 complaints within 20 working days of acknowledgement, where possible.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Complaint Policy (Under point 3.6)	When considering a complaint escalation that has been received and it is clear that due to complexity or other factors that more time will be required to investigate we will inform the complainant in the acknowledgment or a further email of the new expected timescale which will not exceed an additional 20 working days.
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Complaint acknowledgements have been updated to cover this	We provide details of the Ombudsman when we require an extension of the response timescales.

6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Complaint Policy (Under point 3.7)	A complaint response is provided once an investigation has been completed and no later than the maximum timescale outlined in the Complaints Policy. Any actions required following the investigation will be logged with a timescale and tracked until completion on the Council's complaints system. This is explained in the policy.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	The Council has a template letter which officers need to follow when responding to complaints to ensure a thorough response is provided	The Council addresses all points raised in the complaint, clearly providing reasons for decisions, and referencing any relevant law/good practice.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman	Yes	The Council has a template letter which officers need to follow when responding to complaints to ensure all points are covered.	At the completion of a stage 2 investigation, a response is issued which includes the points stated. The response includes a summary of the complaint, a chronology of any relevant events, the decision and reasons for it. It also includes any actions and learning with timescales for implementation and a reasonable remedy which may include compensation.

	Service if the individual remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaint Policy (Under point 6.1)	All relevant officers are consulted before a second stage complaint response is finalised, to ensure that the decision is a corporate one.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; 	Yes	In complaint responses if we are in the wrong we will apologise, explain what happened and provide information on what actions will be taken to remedy the issue whether that be a change in policy or procedure, sending a reminder to staff, taking specific action or providing a financial remedy. All actions are documented on the Council's complaints system and assigned to an officer to action.	The Council will always try to resolve the issues as soon as possible. If the Council is at fault, it will accept fault, offer an apology, and provide a plan of action to put things right if the issues have not yet been resolved.

	<ul style="list-style-type: none"> Changing policies, procedures or practices. 			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaint Policy (Under point 4.1)	<p>The Council follows the remedies guidance provided by the Housing Ombudsman. All remedies are considered on their own merit and in line with published guidelines.</p> <p>The Council will try its best to manage expectations of what remedies can and cannot be delivered.</p>
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Remedies are logged on the Complaint system and assigned to an officer with a timescale for completion	Any actions to be taken to remedy fault will be explained and clear timescales will be provided. Corrective actions will be monitored and tracked to completion.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaint Policy (Under point 4.1)	The Council follows the Housing Ombudsman guidance on compensation and considers payments that are required by law, any refunds/reimbursement of losses, time and trouble, distress and inconvenience.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service	Yes	Open data link to annual reports: Annual Report Data	The Council produces an annual report which includes our self-assessment of the Code, quantitative and qualitative data on

	<p>improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 			<p>performance and the types of complaints received, any findings of non-compliance with the Code, any annual report about the landlord's performance from the Ombudsman, and any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. The report is then reviewed through the Council's governance procedures which includes Cabinet and relevant scrutiny committees.</p>
8.2	<p>The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response</p>	Yes	<p>Copy of latest published annual report on relevant website page: Latest Annual Report</p>	<p>The annual complaints report is reported to the Council's governing body and to the relevant scrutiny committees. The annual complaints report is also published on the Council's website on the Complaints page. The governing body's response to the report can be found in the Cabinet report minutes</p>

	to the report must be published alongside this.		Cabinet response to report: Decision - Complaints Annual Report 2024 - 2025	under the relevant governance page along with a copy of the report. The report for this year is awaiting to go through the relevant governance procedures before it is published.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	This is our latest self-assessment and is to be included as an appendix in our annual report 2024/2025	The Council will carry out a self assessment if there have been significant changes. The outcome of the self assessment is reported to elected members. It is also published on the Council's website and included in the annual complaints report.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We self-assess against the Code on an annual basis and when asked by the Ombudsman.	Noted. The Council has not been asked to do this.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	We will alert the Ombudsman and resident if we are unable to comply with the Code due to exceptional reasons.	The Council will inform the Ombudsman if due to exceptional circumstances we are unable to comply with the requirements of the Code. We will advise complainants who may be affected and we will publish on our website a timescale of when we will be returning to compliance with the Code.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Learning and improvements are included in the Council's Annual Complaint Report	The Council will always look beyond the circumstances of the complaint and try to learn lessons from complaints and implement any more general service improvements to benefit residents.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	We discuss complaints in our departmental management meets and report on performance and quality of responses on a quarterly basis.	<p>The Council uses the learning and feedback from complaints to inform decisions, learning and improvements across the Council. The Council continuously scrutinise complaints data to identify themes and trends so that change can be made to prevent issues occurring.</p> <p>We discuss complaints in our departmental management meets and report on performance and quality of responses on a quarterly basis. All findings and actions highlighted in the complaints handling review aim to embed a new way of working and a new culture</p>
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Wider learning and improvements are included in the annual report which goes to relevant scrutiny committees. We also discuss complaints during residents' panels	Learning from complaints is included in the Council's annual complaints report which goes to Cabinet and is considered at scrutiny committees. If some of the recommendations include training needs or reminders to staff, senior managers will communicate

				<p>this. Residents are informed in complaints responses of any service improvements that will be implemented as a result of their complaint.</p> <p>Under the new tenant engagement strategy and model there is a clear commitment to respecting resident feedback and how this is not only implemented in the service but positive change is communicated back to the resident. Examples include: A tenant and leaseholder led review of complaint responses a minimum of once per year; communicating learning from trends in our complaints in tenant targeted communications; using complaints as a form of insight when reviewing policies.</p> <p>To effectively embed a culture of respect for resident feedback, the service responsible for engagement will carry out training and briefings with individual teams and a quality management system will be linked to the new strategy to measure impact and identify gaps in practice.</p>
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9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	The Director of Housing Services is the appointed person	<p>The Director of Housing Services is the senior lead person accountable for complaint handling for Housing Management complaints. The Director is provided with data on stage 1, stage 2 and Ombudsman enquiries and has the autonomy to direct service changes.</p> <p>The Quality Assurance and Standards Team are leading on a full review of complaints handling for Housing and feeding findings into the Director of Housing Services to lead on change.</p>
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	The Deputy Leader of the Council is the MRC	MRC has been appointed as the Cabinet Member for Housing who is directly involved in the review and whose role in driving a positive complaints culture will continue to grow as we embed a new way of working. Complaints are reported quarterly to the Council's Management Team (CMT) and annually to Cabinet, Policy Co-ordination Group (PCG) and the relevant Scrutiny Committee.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must	Yes	The MRC has access to staff who will provide the relevant information for discussion with the governing body	The Deputy Leader of the Council will receive regular updates on complaint performance data and is copied into all upheld Ombudsman decisions (the anonymised report only). They have a

	have access to suitable information and staff to perform this role and report on their findings.			direct line in to the Deputy Director of Democratic and Corporate Governance who oversees the corporate complaints team.
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	Yes	The MRC is updated quarterly and received the annual complaints report which includes all the data outlined	<p>Information relating to complaints is provided quarterly to CMT which includes volumes, performance, outcomes, compensation, root causes, and Ombudsman cases. All Ombudsman decisions are circulated to Corporate Directors, Directors, Heads of Service and officers involved with the complaint when the decision is received. The upheld Final Decisions are also circulated to the Chief Executive, the Leader, and Deputy Leader as portfolio holder. A summary of the upheld cases is also included in the Council's annual complaints report. The self-assessment the Council undertakes in relation to the Housing Ombudsman Code will be included in the Council's annual complaints report if there have been any significant changes.</p>
9.8	Landlords must have a standard objective in relation to complaint handling for all	Yes	We share our objectives with staff and contractors that are working on our	The Council works collaboratively with teams across departments to achieve a joined-up approach to complaints.

	<p>relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 		<p>behalf to ensure there is one goal and we work together to achieve it for the benefit of our residents</p>	<p>Council services collectively take responsibility and identify solutions to make things right. All findings and actions highlighted in the complaints handling review aim to embed a new way of working and a new culture</p>
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