Public Document Pack

Brent Housing Scrutiny Committee

Tuesday 24 November 2026 at 6.00 pm

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

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

The meeting will be open for the press and public to attend or alternatively can be followed via the live webcast. The link to follow proceedings via the live webcast will be made available HERE.

Membership:

Members	**Substitute Members**
Councillors:	Councillors:
Donnelly-Jackson (Chair)	Anderson, Blackman, Burn and Thomas
I. Ahmed	
Dar	Councillors:
Georgiou	Maurice and H. Patel
Ibrahim	
Madabhushi	Councillors:
Malonga	Lorber and Unger
Mishra	
Want	Councillors:
	Alexandre and Ryan

For further information contact: Chatan Popat, Strategy Lead – Scrutiny
Chatan.popat@brent.gov.uk

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

recycle for Brent

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

or

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

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

Agenda

Introductions, if appropriate.

Item Page

1 Apologies for absence and clarification of alternate members

2 Declarations of interests

Members are invited to declare at this stage of the meeting, the nature and existence of any relevant disclosable pecuniary or personal interests in the items on this agenda and to specify the item(s) to which they relate.

3 Deputations (if any)

To hear any deputations received from members of the public in accordance with Standing Order 67.

4 Matters arising (if any)

5 Housing Scrutiny Committee Work Programming Report 2026-2027 1 - 8

To present the Housing Scrutiny Committee Work Programme for agreement.

6 Update from the Housing Management Advisory Board (HMAB) 9 - 20

To receive an update on the activity and outcomes of the Housing Management Advisory Board (HMAB).

7 Private Rented Sector (PRS) 21 - 62

To receive an update on the Private Rented Sector in Brent.

8 Supported Accommodation 63 - 88

To receive an update on Supported Accommodation provision in Brent, including Council operated schemes, schemes operated by other providers, and non-commissioned supported exempt accommodation.

9 Any other urgent business

Notice of items to be raised under this heading must be given in writing to the Deputy Director Democratic or Corporate Governance or their

representative before the meeting in accordance with Standing Order 60.

Date of the next meeting: **Wednesday 17 February 2027**

Brent	**Housing Scrutiny Committee** 24 November 2026
	Report from the Deputy Director, Democratic and Corporate Governance

Housing Scrutiny Committee – Work Programme 2026/27

Wards Affected:	All
Key or Non-Key Decision:	Not Applicable
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
List of Appendices:	One Appendix A – Housing Scrutiny Committee Work Programme 2026/27
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Chatan Popat Strategy Lead – Scrutiny, Democratic and Corporate Governance chatan.popat@brent.gov.uk Amira Nassr Deputy Director, Democratic and Corporate Governance Amira.Nassr@brent.gov.uk

1.0 Executive Summary

1.1 To present the Committee's work programme for 2026/27.

2.0 Recommendation(s)

2.1 That the Committee's work programme (set out in Appendix A) be agreed.

3.0 Detail

3.1 Contribution to Borough Plan Priorities & Strategic Context

3.1.1 Borough Plan 2023-2027 – all strategic priorities.

3.2 Background

3.2.1 The work programme outlines the items which the Housing Scrutiny Committee will consider during the municipal year.

3.2.2 The programme is in line with the remit of the Committee which is set out in the Council Constitution (under the Terms of Reference for scrutiny committees[1]):

Housing needs and support; Homelessness and rough sleeping; Temporary Accommodation; Tenancy sustainment and compliance; Tenant and leaseholder engagement; Homes Adaptation Service; Fire safety in housing; Private Rented Sector support; Landlord licensing and forum; Renters' Rights Bill enforcement; New Council Housing delivery; Affordable Homes Programme; Housing compact with registered providers; i4B and First Wave Housing; Housing Revenue Account (HRA) and Housing spend.

3.2.3 Committee members prioritised items for inclusion in its work programme at its annual work planning meeting, ensuring items selected aligned with:

- The strategic priorities set out in the Borough Plan 2023-27
- Areas of local community concern
- Significant issues affecting a significant number of residents/wards
- Emerging policies, strategies, or key decisions where there is strong interest for scrutiny input.

Nonetheless, this method of prioritisation is in line with best practice[2].

3.2.4 The work programme of a scrutiny committee is intended to be a flexible, living document that can adapt and change according to the needs of a committee. The 2026/27 work programme will therefore be regularly reviewed throughout the municipal year by the Committee and updated accordingly where necessary.

4.0 Stakeholder and ward member consultation and engagement

4.1 Non-executive members were involved in developing the work programme as part of their membership of the Committee.

4.2 In developing its work programme, the Committee held sessions with stakeholders such as the relevant cabinet member, corporate director, and ward councillors to temperature check key priority areas, avoid work duplication, and most importantly confirm the work programme reflects matters of local community concern.

5.0 Financial Considerations

[1] Brent Council Constitution, Part 4.
https://democracy.brent.gov.uk/documents/s142996/Part%204%20May%202024%20Terms%20of%20Reference%20.pdf

[2] The Good Scrutiny Guide (Centre for Public Scrutiny).
https://www.cfgs.org.uk/wp-content/uploads/CfPS-Good-Scrutiny-Guide-v4-WEB-SINGLE-PAGES.pdf

5.1 There are no financial considerations arising from this report. However, budget and financial implications are addressed in the 'Financial Considerations' section of any reports to the Committee, requested as part of its work programme.

6.0 Legal Considerations

6.1 There are no legal considerations arising from this report. However, legal implications are addressed in the 'Legal Considerations' section of any reports to the Committee, requested as part of its work programme.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

7.1 There are no EDI considerations for the purposes of this report. However, EDI implications are addressed in the 'EDI Considerations' section of any reports to the Committee, requested as part of its work programme.

8.0 Climate Change and Environmental Considerations

8.1 There are no climate change and environmental considerations for the purposes of this report. However, climate change and environmental implications are addressed in the 'Climate Change and Environmental Considerations' section of any reports to the Committee, requested as part of its work programme.

9.0 Human Resources/Property Considerations (if appropriate)

9.1 There are no human resources or property considerations for the purposes of this report. However, human resources or property implications are addressed in the 'Human Resources/Property Considerations' section of any reports to the Committee, requested as part of its work programme.

10.0 Communication Considerations

10.1 There are no communication considerations for the purposes of this report. However, communication implications are addressed in the 'Communication Considerations' section of any reports to the Committee, requested as part of its work programme.

Report sign off:

Amira Nassr
Deputy Director, Democratic and Corporate Governance

This page is intentionally left blank

Appendix A

Housing Scrutiny Committee: 2026/27 Work Programme

Confirmed Meeting Dates:

- **Tuesday 24 November 2026, 6pm**
- **Wednesday 17 February 2027, 6pm**
- **Tuesday 27 April 2027, 6pm**

Tuesday 24 November 2026

Agenda Item	Leader/Deputy Leader/Cabinet Members	Corporate Directors / Directors	External Organisations / Participants
Housing Scrutiny Committee Work Programme 2026/27	Councillor Fleur Donnelly-Jackson, Chair of the Housing Scrutiny Committee	Minesh Patel Corporate Director, Finance and Resources	
Update from the Housing Management Advisory Board (HMAB)	Cllr Robert Johnson Cabinet Member for Housing, Homelessness and Renters	Tom Cattermole Corporate Director, Residents and Housing Services	Independent Chair, Housing Management Advisory Board
Private Rented Sector (PRS)	Cllr Robert Johnson Cabinet Member for Housing, Homelessness and Renters	Tom Cattermole Corporate Director, Residents and Housing Services	Representation from Renters' Rights London (Brent)
Supported Accommodation	Cllr Robert Johnson Cabinet Member for Housing, Homelessness and Renters	Tom Cattermole Corporate Director, Residents and Housing Services	

Wednesday 17 February 2027

Agenda Item	Leader/Deputy Leader/Cabinet Members	Corporate Directors / Directors	External Organisations / Participants
Temporary Accommodation and Homelessness Prevention	Cllr Robert Johnson Cabinet Member for Housing, Homelessness and Renters	Tom Cattermole Corporate Director, Residents and Housing Services	TBC
Resident Engagement	Cllr Robert Johnson Cabinet Member for Housing, Homelessness and Renters	Tom Cattermole Corporate Director, Residents and Housing Services	TBC
Registered Providers and Housing Associations	Cllr Robert Johnson Cabinet Member for Housing, Homelessness and Renters	Tom Cattermole Corporate Director, Residents and Housing Services	TBC

Tuesday 27 April 2027

Agenda Item	Leader/Deputy Leader/Cabinet Members	Corporate Directors / Directors	External Organisations / Participants
Housing Management: Tenant Satisfaction Measures Brent Housing Management (BHM) Performance	Cllr Robert Johnson Cabinet Member for Housing, Homelessness and Renters	Tom Cattermole Corporate Director, Residents and Housing Services	TBC
Housing and Tenant Satisfaction improvement Programme (HTSIP)	Cllr Robert Johnson Cabinet Member for Housing, Homelessness and Renters	Tom Cattermole Corporate Director, Residents and Housing Services	TBC
Investment 4 Brent (I4B) and First Wave Housing (FWH)	Cllr Robert Johnson Cabinet Member for Housing, Homelessness and Renters	Tom Cattermole Corporate Director, Residents and Housing Services	TBC

*Placeholder slots have been saved as per the request of Lead Members and Corporate Directors

This page is intentionally left blank

	Housing Scrutiny Committee 24 November 2026
	Report from the Corporate Director of Residents and Housing Services
	Lead Cabinet Member for Housing, Homelessness and Renters - Cllr Robert Johnson

Update on the Housing Management Advisory Board

Wards Affected:	All
Key or Non-Key Decision:	Non-Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
List of Appendices:	Appendix A - Housing Management Advisory Board Terms Of Reference
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Spencer Randolph Director of Housing Service Spencer.randolph@brent.gov.uk Jodi Cooper Head of Quality Assurance, Engagement & Insight Jodi.Cooper@brent.gov.uk

1.0 Executive Summary

1.1. The purpose of this report is to update the Housing Scrutiny Committee on the development and work of the Housing Management Advisory Board (HMAB) since its establishment in April 2025.

1.2. The Community and Wellbeing Scrutiny Committee received an update from the HMAB in November 2025.

1.3. The report summarises the Board's oversight activity, changes to its membership, development of its performance dashboard and forward plan, and its role in supporting resident influence and continuous improvement across Housing Management Services.

2.0 Recommendation(s)

2.1 That the Housing Scrutiny Committee notes the progress made in developing the Housing Management Advisory Board and its role in providing independent challenge, resident insight and oversight of Housing Management Services.

2.2 That the Committee considers the Board's current work priorities and identifies any matters it wishes the Board to consider as part of its future work programme.

3.1 Contribution to Borough Plan Priorities and Strategic Context

3.1.1 The Board supports the objectives of the Council's Borough Plan, *Moving Brent Forward Together*, and its commitment to building thriving communities by ensuring that residents' voices are heard and can influence the delivery of Housing Management Services.

3.1.2 This report provides an overview of the Board's activities and demonstrates how members scrutinise performance, challenge the service and influence improvements. It also sets out how performance information, including Tenant Satisfaction Measures (TSMs), is being used to strengthen transparency, resident engagement and accountability.

3.2 Background

3.2.1 The HMAB was established in April 2025 to provides an important forum for discussion and oversight, whilst not exercising formal decision-making powers.

3.2.2 The Board acts as a critical friend to Housing Management, providing a forum for constructive challenge, discussion and oversight while having no formal decision-making powers. Its responsibilities include scrutinising regulatory compliance, monitoring delivery of the Housing Management Improvement Plan, and contributing to the development and review of housing policies.

3.3 Activities

3.3.1 **Meetings and work programme -** The Board meets every two months, with six formal meetings each year. The meetings last two hours and take place in person. Members are expected to review papers in advance and can access training to support their role.

3.3.2 In addition to the scheduled Board meetings, additional meetings are also held to provide dedicated time for focused discussion and scrutiny of specific service areas and priority issues, such as voids and the rent recovery project. This approach enables Board members to review key issues in greater depth and support effective oversight and service improvement.

3.3.3 Board members contribute collaboratively to agenda-setting. Agendas are informed by matters arising from previous meetings, the forward plan and trends identified through the performance dashboard. Standing items include a

performance data review and updates on the Council's self-referral to the Regulator of Social Housing.

3.3.4 **Performance and regulatory oversight -** A dedicated HMAB performance dashboard was introduced in May 2026 and subsequently refined in response to Board member feedback. The revised dashboard was launched on 15 September 2026 and provides members with regular oversight of performance across Housing Management Services brings together key measures covering complaints, repairs, voids, rent collection, property management and arrears, alongside relevant Tenant Satisfaction Measures (TSMs).

The dashboard also supports trend analysis and benchmarking against peer performance, helping Board members identify areas of concern, challenge performance and monitor service improvements.

3.3.5 The Board is able to use the information detailed to select which areas they would like more focus on and recommend items on the future forward plan for in-depth scrutiny

3.3.6 The Chair met with the Regulator of Social Housing on 25 February 2026 to discuss the Regulator's assessment following the Council's self-referral and progress against the Recovery Action Plan. Discussion included resident engagement and the steps being taken to strengthen residents' involvement and influence. The Chair subsequently briefed Board members on the discussion and the areas of interest raised by the Regulator.

3.3.7 At the meeting, discussions focused on resident engagement and the action being taken to strengthen resident involvement and influence. The Chair advised that the Regulator expressed strong interest in the Council’s approach and highlighted the progress being made and our continued commitment to improvement.

3.3.8 Tenant Satisfaction Measures form part of the performance information considered by the Board and provide an important resident perspective alongside operational performance data. The Board uses trends in satisfaction to identify areas requiring further scrutiny and to test whether improvements in operational performance are being reflected in residents' experience of services.

3.3.9 The Board is kept informed of significant service issues through briefing papers setting out the nature of the issue, the corrective action required and progress against agreed actions. Subsequent update reports enable the Board to track delivery and provide further challenge where required. The Chair also meets relevant members of the senior management team between Board meetings to discuss significant issues and progress, with key outcomes reported back to Board members.

3.3.10 **Forward plan -** At the Board meeting held on 15 September 2026, the Board agreed their forward plan and the key areas for scrutiny identified were -

- Repairs & Building Safety
- Resident Engagement
- Void Management
- Complaints & Learning
- Rent Collection & Tenancy Sustainment / Rent Compliance Recovery Plan
- Performance & Regulatory Assurance
- Housing Management Performance Review
- Board Effectiveness & Annual Planning

3.3.11 **Impact and outcomes -** During its first 18 months, the Board's scrutiny has resulted in a number of areas receiving additional management focus.

This includes:

- **Voids:** Following Board scrutiny of some long-term voids and the challenges faced in re-letting these properties, the service has devised an action plan for each individual property to progress the necessary works and return it to occupation as soon as practicable. However, for void properties identified as financially unviable to bring back into use, the Board has requested that a strategy be developed setting out the options for consideration, including a potential disposal programme and that an update on the strategy's development and proposed timescales be presented at the next Board meeting.

- **Rent recovery:** The Board challenged the rent compliance and potential overcharges that were identified in 1365 cases and requested that a review of each case be undertaken and corrective action implemented where applicable. In response, the Rent Compliance Recovery Working Group was established and a Housing Quality Network review of rent setting incorporating specialist legal advice was carried out. The outcome of which has indicated that the majority of the cases have had the correct level of rent applied and are therefore compliant, reducing the potentially affected cohort from to approximately 250–300 cases and the potential financial exposure

- **Performance:** Board members contributed to the redesign of the HMAB performance dashboard, resulting in a more focused and accessible reporting format that better supports effective scrutiny, highlights key performance issues and enables Board members to provide informed challenge on service delivery and improvement.

- **Resident engagement:** The Board's challenge on regulatory readiness and embedding resident engagement across Housing, with all staff and managers. This has led to a mock inspection being carried out and a review of the

engagement offer to ensure that it aligns with TSM resident engagement requirements.

3.3.12 **Board composition and membership -** The Terms of Reference provide for an annual review of the Board's operation and membership arrangements. In line with this provision and following the resignation of two of the board members due to personal commitments, a review of the Board's composition was recently undertaken to ensure it remains effective, representative and capable of providing robust challenge and independent scrutiny.

3.3.13 The revised structure increases the number of independent members from three to four and reduces staff representatives from three to two. Overall membership remains unchanged at 12.

3.3.14 This change increases the proportion of independent representation while retaining three council tenant members, two councillors and sufficient operational input from Housing Management staff. The Board's purpose, functions, meeting arrangements and reporting relationships remain unchanged.

3.3.15 The new membership structure will not change the Board's purpose, functions, meeting arrangements or reporting relationships and will deliver the following benefits:

- Increase independent representation and expertise.
- Strengthen the Board's ability to provide constructive challenge.
- Retain a strong resident voice through the continued representation of three council tenant members.
- Maintain democratic accountability through councillor representation.
- Preserve operational input from Housing Service staff whilst ensuring a greater degree of independence.
- Support the Board in fulfilling its purpose as set out within its Terms of Reference.

3.3.16 An extensive recruitment process took place during the Summer and two new independent Board members were successfully appointed. Following the local elections, the councillor membership of the Board was also updated, with Cllr Johnson (as Cabinet Member) and Cllr Anderson joining the Board.

4.0 Stakeholder and ward member consultation and engagement

4.1 A dedicated Housing Management Advisory Board (HMAB) webpage was launched on 12 February 2026, providing information on the Board’s purpose, membership profiles and opportunities for residents to engage directly with Board members. The webpage also provides a platform for sharing updates on service delivery and performance standards.

4,2 To increase the Board's visibility and strengthen engagement with residents, Board members are encouraged to attend key resident engagement activities,

including the annual Housing Roadshow, tenant and leaseholder events and Tenant and Residents' Association (TRA) seminars.

5.0 Financial Considerations

5.1 The costs associated with the operation of the Housing Management Advisory Board (HMAB), including member remuneration, recruitment and training, are funded from existing Housing Revenue Account (HRA) budgets. No additional budget growth is required as a result of the recommendations contained within this report.

5.2 The appointment of one additional independent member is expected to result in a modest increase in expenditure which can be accommodated within existing approved budgets.

5.3 The HMAB provides an important assurance and oversight function through its scrutiny of key housing management activities, including repairs, building safety, complaints, void management, rent collection and regulatory compliance. Effective oversight supports the early identification and management of service delivery and financial risks and contributes to the Council's wider governance arrangements.

5.4 No significant financial risks are directly associated with the recommendations in this report. However, continued effective scrutiny and challenge through the HMAB supports compliance, service improvement and the long-term financial sustainability of the Housing Revenue Account.

6.0 Legal Considerations

6.1 N/A

7.0 Equity, Diversity & Inclusion (EDI) Considerations

7.1 The Board is required to operate in accordance with the Council's Equity, Diversity & Inclusion (EDI) policy, ensuring broad and representative participation in its membership and decision-making processes.

8.0 Climate Change and Environmental Considerations

8.1 The Board are responsible for holding Housing Management Services to account for service delivery, including those which fall under the Councils Climate Action strategy.

9.0 Human Resources/Property Considerations (if appropriate)

9.1 N/A - although the Board are required to review its operation, membership, terms of reference and code of conduct on an annual basis

10.0 Communication Considerations

10.1 N/A

Report sign off:

Tom Cattermole
Corporate Director of Residents and Housing Services

This page is intentionally left blank

Housing Management Advisory Board

Terms of Reference

Purpose

1.1 The purpose of the Housing Management Advisory Board (The Board) is to support, advise and provide challenge to the housing management service at Brent Council by:

- Acting as a critical friend to the housing management service regarding its compliance with the regulatory framework set out by the Regulator of Social Housing (The Regulator);
- Monitoring the delivery and impact of the Housing Management Improvement Plan; and
- Providing a key governance step in the development and review of service policies, with particular focus on holding the service accountable for effective resident engagement throughout this process where applicable.

1.2 The Board is not a decision-making body and is not involved in day-to-day operational matters of service delivery or individual case work for housing management or any other Council service.

Membership

2.1 Full quorum of membership to the board will include:

- 1 x independent chair
- 3 x independent members
- 3 x council tenant members
- 2 x Councillors
- 3 x staff representatives

2.2 Councillor representatives will include the Portfolio Holder responsible for the Housing Management service and a fellow Councillor to be agreed between the Portfolio Holder and the Director of Housing Services. Staff representatives will be agreed and appointed jointly by the Corporate Director of Residents and Housing Services and the Director of Housing Services.

2.3 Council tenant and independent representatives will be appointed following an application and recruitment process.

Meetings

Frequency, location and length

3.1 The Board will meet on a bi-monthly basis, with meetings taking place in-person at the Brent Civic Centre, unless otherwise agreed in advance by The Board.

3.2 Meetings will be two hours in length, taking place between 6pm – 8pm, unless otherwise agreed in advance by The Board.

3.3 Extra-ordinary meetings may be called on occasion to provide additional time for specific discussions or in response to emerging priorities.

Agenda and documentation

3.4 An agenda will be set in agreement by the Chair and Director of Housing Services at least four weeks in advance of each meeting.

3.5 All documentation required for a meeting of The Board, including meeting agenda, will be circulated no later than three working days in advance of the meeting.

Support and Chairing responsibilities

3.6 Administrative support for The Board (i.e., arranging meetings, collating and circulating agendas and other documents as needed, minute taking during meetings etc.) will be provided by the Council.

3.7 Should the Chair be unavailable to lead the meeting, then an Independent or Tenant Board Member can volunteer to Vice Chair in their absence. Chair training will be provided to any Member who wishes to attend.

Quorum

3.8 In order for a meeting to go ahead, there must be no less than seven Board members in attendance, with at least one representative from each membership group (i.e. Councillor, tenant, staff, independent) present.

Conduct

3.9 All Board Members and guest attendees must adhere to the agreed Code of Conduct for the Housing Management Advisory Board.

Training and remuneration

4.1 Members of The Board will be assisted to access training to support their role as a Board Member. General training or expertise briefings can be provided to the wider Board where needed and as agreed by the Chair and Director of Housing Services.

4.2 Council tenant and independent representatives on The Board will be remunerated for their attendance at Board meetings in line with the Housing Engagement Incentives and Rewards Policy. Remuneration will be paid in two instalments during the year and will only be paid where the Board Member has attended at least 50% of meetings over the previous 6 months.

4.3 Council tenant and independent Board Members can claim reimbursement of reasonable expenses they incur through Board activity.

Links to Council governance structure

5.1 The activities of the Board will be included in an annual update to the Community and Wellbeing Scrutiny Committee re. Housing Services.

Review

6.1 The Board will review its operation, membership, terms of reference and code of conduct on an annual basis.

This page is intentionally left blank

	Housing Scrutiny Committee 24 November 2026
	Report from the Corporate Director of Residents and Housing Services
	Lead Cabinet Member for Housing, Homelessness and Renters - Cllr Robert Johnson

Regulation and Improvement of Brent's Private Rented Sector (PRS)

Wards Affected:	All
Key or Non-Key Decision:	Non - Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
List of Appendices:	Appendix 1- Renters Rights 2025 – who will do what Appendix 2- Definition of CPN factors to consider Appendix 3 - Brent's Civil Penalty Explanatory notes Appendix 4 - Licensing Communication & Engagement Strategy Appendix 5 - Licensing Communication Operational Plan
Brent	None
Contact Officer(s): (Name, Title, Contact Details)	Spencer Randolph Director of Housing Services Spencer.Randolph@brent.gov.uk Triza Handa Head of Private Housing Services Triza.Handa@brent.gov.uk

1.0 Executive Summary

1.1 The purpose of this report is to provide an overview of Brent's private rented sector and the Council's approach to regulating and improving standards, protecting tenants and ensuring that privately rented accommodation is safe and properly managed.

1.2 The report demonstrates the significant progress made through the Council's property licensing, proactive inspection and enforcement programmes. It highlights increased regulatory activity, improvements secured for residents, action taken against non-compliant and rogue landlords, and the Council's preparations for its enhanced responsibilities under the Renters' Rights Act 2025. The report also identifies the capacity, skills, data and funding required to sustain and strengthen this approach.

2.0 Recommendation

2.1 That the Housing Scrutiny Committee notes the work being undertaken by Private Housing Services, and the role it plays in regulating the private rented sector to make sure that private tenants live in safe and secure homes.

2.2 That the Committee considers the Private Housing Services current work priorities and identifies any matters it wishes the service to consider as part of its future work programme.

3.0 Background

Overview and Characteristics of Brent's Private Rented Sector

3.1 The private rented sector (PRS) plays a central role in meeting housing need in Brent and is one of the largest PRS in London.

3.2 Tenure modelling undertaken in October 2022 as part of the Council Selective licensing designation, estimated that Brent has approximately 127,000 dwellings, of which around 58,000 (46%) are privately rented. This compares with a national average of approximately 20%, highlighting the significance of the sector within the borough's housing market.

3.3 A 2022 property condition survey undertaken by Metastreet found that private renters represent the largest housing tenure group in Brent. The sector accommodates a diverse population, including families with children, young professionals, older people and lower-income households. For many residents, private renting is not necessarily a matter of choice but reflects limited access to affordable home ownership or social housing.

3.4 The survey identified a number of significant challenges within the borough's PRS:

- Poor housing conditions: Over 30% of privately rented homes were assessed as non-decent, compared with a national PRS average of 21%.
- Housing hazards: Approximately 18% of privately rented properties were estimated to contain Category 1 hazards, above the national average of 12%.
- Fuel poverty: Around 17.3% of Brent households were experiencing fuel poverty, compared with 13.8% nationally, with poor energy efficiency and property conditions contributing to the issue.
- Affordability pressures: High rental costs continue to place significant financial pressure on many households, particularly lower-income residents.
- Housing insecurity: Brent has historically experienced high levels of landlord possession claims, with 2,399 claims recorded in 2019, the fourth highest number in London.

3.5 These factors demonstrate the scale of housing challenges within Brent's private rented sector and the importance of targeted intervention to improve housing standards, tenant safety and landlord compliance.

3.6 Supporting the Council's commitment to providing safe, secure and decent housing, the Brent Labour Manifesto (2022) identified borough-wide landlord licensing as a key mechanism for driving improvements across the sector.

4.0 Contribution to Borough Plan Priorities & Strategic Context

4.1 The work detailed in this report and that of the Private Housing Service more generally supports the Council's wider borough plan to Move Brent Forward Together. In particular, the work supports the borough plan priority to provide prosperity and stability in Brent through helping to deliver the desired outcome for safe, secure and decent housing across the Borough.

4.2 The Borough Plan includes two priorities specific to Housing, these are:

· Strategic Priority 1 – Prosperity and Stability in Brent

· Strategic Priority 2 – A Cleaner, Greener Future

4.3 Effective implementation and enforcement of the three licensing schemes ensures that privately rented homes are safe, well managed and provide residents with secure and decent housing conditions.

4.4 Licensing plays a key role in improving housing standards across the borough by addressing poor property conditions, overcrowding, property management issues and tenancy-related concerns. By strengthening compliance and accountability within the private rented sector, the Council is better able to protect vulnerable residents, improve health and wellbeing outcomes, and create more sustainable communities.

4.5 The licensing framework also supports the Council's wider strategic objectives by contributing to the prevention of homelessness, improving housing quality, reducing anti-social behaviour, and enhancing environmental standards through property improvements. This work aligns with the Council's broader housing priorities and supports delivery of key strategies, including:

- Private Sector Housing Strategy
- Homelessness and Rough Sleeping Strategy
- Borough Plan 2023-2027
- Housing Strategy and wider ambitions to improve housing conditions and neighbourhoods across Brent

4.6 The continuation of a robust regulatory approach to the private rented sector will help ensure that Brent remains a place where residents can access safe, secure and well-managed homes, while supporting the Council's commitment to reducing inequalities and improving outcomes for communities across the borough.

5.0 Detail

5.1 **The Council's Approach to Regulating the Private Rented Sector -** Property licensing is a regulatory framework established under the Housing Act 2004 that enables local authorities to improve housing conditions and management standards in the private rented sector.

5.2 Licensing requires landlords of designated properties to obtain a licence and comply with prescribed conditions relating to property safety, management and occupancy. The legislation provides councils with powers to identify and address poor housing conditions, overcrowding and non-compliant landlords.

5.3 Brent first introduced discretionary licensing schemes in 2015 and in April 2024, introduced a new borough-wide licensing framework in response to concerns about

poor housing standards, overcrowding, unsafe Houses in Multiple Occupation (HMOs) and poor property management.

5.4 Prior to licensing, the Council relied predominantly on reactive enforcement, responding to tenant complaints after issues had arisen. The introduction of licensing enabled the Council to adopt a more proactive approach, identifying risks earlier, improving landlord compliance and taking more effective action against rogue landlords.

5.5 Brent now operates three licensing schemes:

- Selective Licensing - Applies to privately rented properties across all areas of the borough except Wembley Park Ward. Landlords are required to obtain a licence and comply with licence conditions relating to property standards and management.
- Mandatory HMO Licensing - Applies to HMOs occupied by five or more people forming two or more households who share facilities, in accordance with national statutory requirements.
- Additional HMO Licensing - Extends licensing requirements to smaller HMOs occupied by three or four people forming two or more households, following approval by the Secretary of State.

5.6 Together, these schemes provide a comprehensive framework for improving housing conditions, raising management standards and protecting tenants across Brent's private rented sector.

5.7 As of 14 September 2026, the Council has licensed 28,520 privately rented properties across its three licensing schemes:

5.8 Figure 1 below is a breakdown of licensing uptake per ward

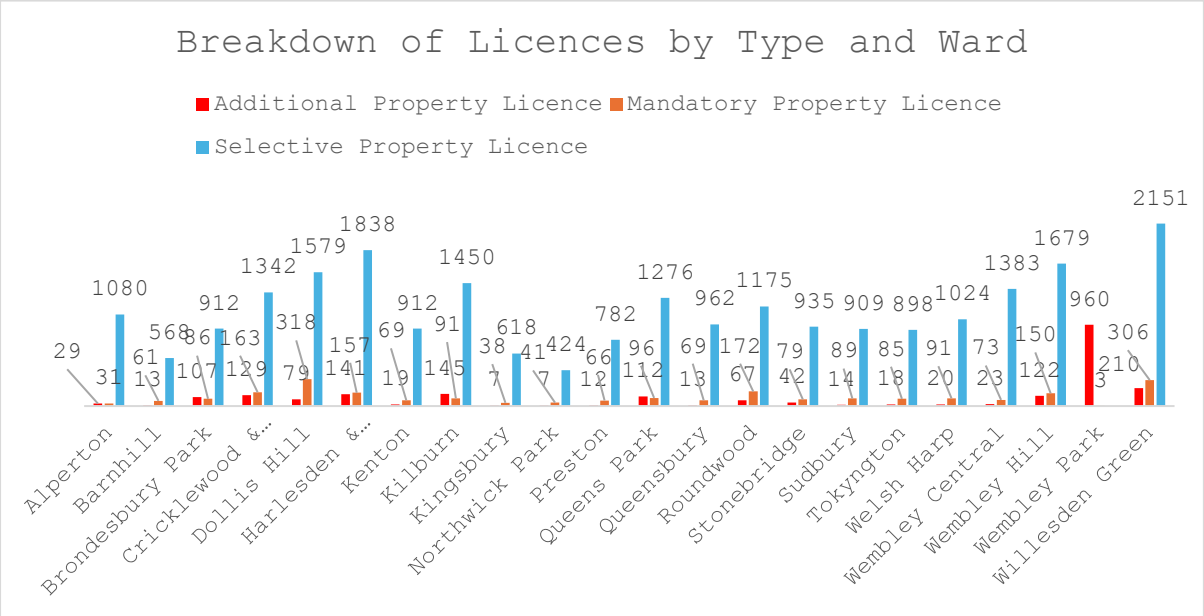


Fig 1

5.9 This represents an overall licensing uptake of 67%, (out of overall licensable 40,000 properties) which means that the scheme is making significant progress towards bringing privately rented properties within the borough under the regulatory framework.

5.10 The Council continues to identify properties that have not yet been licensed through data cleansing, intelligence gathering, targeted inspections and enforcement activity

5.11 **Property Inspections and Improvements -** The principal objective of property licensing is to improve housing conditions and ensure that privately rented properties are safe and properly managed.

5.12 As part of the licensing programme, the Council has committed to inspecting 100% of licensed HMOs and at least 50% of properties licensed under the Selective Licensing Scheme.

5.13 Inspections are proactive and assess compliance with licensing conditions and wider housing standards. They enable officers to identify hazards, require remedial works and take enforcement action where necessary.

5.14 Brent's approach goes beyond simply checking whether landlords have obtained a licence. Inspections provide an opportunity to assess the actual condition of properties, engage with landlords and tenants, and identify residents who may need additional support.

5.15 Where deficiencies are identified, landlords are provided with details of the improvements required and an opportunity to comply. More serious or persistent non-compliance is escalated for formal enforcement action.

5.16 The table below demonstrates the increase in regulatory activity since the introduction of borough-wide licensing, alongside the corresponding number of properties improved following Council intervention.

Financial year	Compliance inspections	Properties improved
2022/23	1,534	1,120
2023/24	3,274	1,419
2024/25	5,758	2,344
2025/26	5,401	2,205

Figure 2: Compliance inspections and properties improved

5.17 **Wider Benefits and Impact of Property Licensing -** In addition to providing a regulatory framework for identifying and addressing poor housing conditions, the licensing programme has created opportunities for greater engagement with landlords, letting agents and tenants promoting stronger partnership working and landlord engagement.

5.18 On 8 June 2026, the Council's annual Landlord Forum attracted a record attendance of more than 480 delegates, building on the success of the Private Renters Fair held in October 2025.

5.19 These events provide opportunities to promote awareness of licensing requirements, housing standards and legislative changes, while helping landlord and tenants better understand their rights and access support services.

5.20 Engagement with landlords is an important part of the Council's approach. While enforcement remains essential, providing advice and guidance can help landlords understand their legal responsibilities and secure improvements without the need for formal action

5.21 **Increased Landlord Accountability and Intelligence-Led Regulation -** Licensing has enabled the Council to develop a more comprehensive register of landlords and privately rented properties, providing improved intelligence about the sector and supporting a more targeted approach to regulation and enforcement. This intelligence-led approach has allowed the Council to direct resources towards areas and properties presenting the highest risks of non-compliance.

5.22 In 2025/26, the Council undertook over 450 unannounced inspections and conducted six targeted street enforcement operations in areas with lower levels of licensing uptake. Street enforcement is a multi-agency operation involving other partner departments like community safety team, waste management teams, the police and where appropriate the lead member. These high-profile enforcement help identify properties operating without the required licence, improve intelligence and provide opportunities to investigate poor housing conditions and non-compliant landlords.

5.23 The inspection data provides encouraging early indications of improving compliance, including an increase in the number of inspected properties where no hazards or breaches were identified.

5.24 Figure 3 below explains the outcomes of a proactive inspections in licensed properties over the past 4 years.

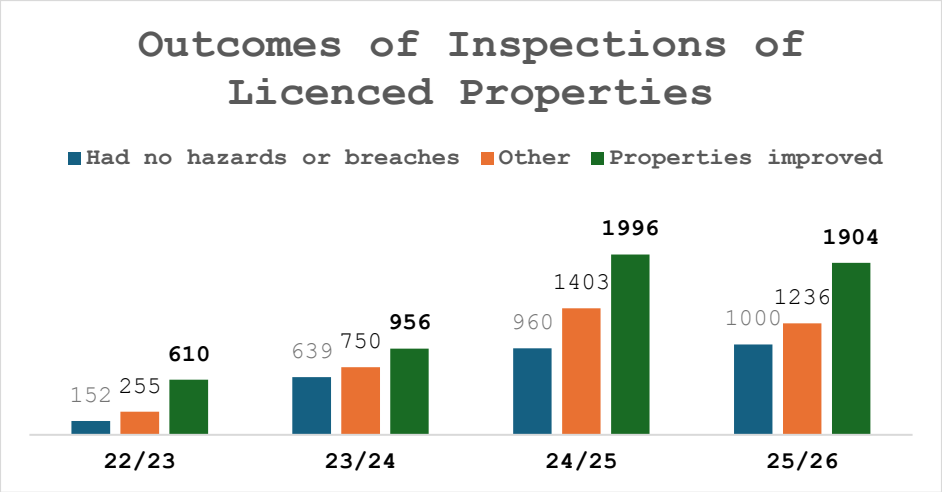


Figure 3

5.25 Noticeably the number of properties found with no hazards increases overtime, and we hope this an early indication of the educational benefit of licensing.

5.26 **Enforcement and Tackling Rogue Landlords -** The success of any licensing scheme relies on effective enforcement against landlords who fail to meet their legal obligations.

5.27 Brent has established a strong record of enforcement activity. Compliance data across local authorities is limited, but a survey conducted by the National Residential Landlords Association (NRLA) in 2024 identified Brent among the top ten local authorities for inspection activity, formal improvement notices and civil penalties. The Council has continued to strengthen its enforcement activity.

Financial year	Civil Penalty Notices issued	Total amount of fines	Prosecutions
2024/25	42	£232,900	5
2025/26	67	£298,900	16
2026/2027	26	£150,536	7

5.28 Prosecution is generally reserved for the most serious offenders but remains an important enforcement approach for tackling rogue landlords.

5.29 To date, the team has successfully secured two Banning Orders against two of the borough's most prolific rogue landlords. A Banning Order is the most severe sanction that a court can impose for housing-related offences, preventing landlords from letting housing or engaging in property management activities for a specified period.

5.30 Banning Orders remain a rarely used but significant sanction for the most serious housing-related offending. Brent's successful use of these powers demonstrates the Council's willingness to pursue the strongest available enforcement options where landlords repeatedly or seriously fail to meet their legal responsibilities.

5.31 **Improved Tenant Protection, A Tenant-First Approach -** Brent's proactive approach to property licensing places tenants at the centre of its compliance activity.

5.32 Inspections are designed to engage positively with both landlords and tenants, providing opportunities to understand the circumstances of residents, identify problems and work constructively with landlords to secure improvements.

5.33 Many tenants are reluctant to report problems because they may not know how to access support, are unaware of their rights or fear repercussions from their landlord. A proactive inspection approach helps overcome these barriers and ensures that vulnerable residents are not overlooked.

5.34 The following case studies illustrate the tangible difference this approach can make.

Case study 1 – Improving living conditions for an older resident

During a proactive inspection in 2024, officers identified an older tenant in her 80s who had lived in her one-bedroom property in the Dollis Hill area for most of her adult life.

Despite living there for many decades, she had never had central heating or adequate heating throughout her home. Her only source of heating was a gas fire in the living room, dating from the 1970s. She explained that she was not aware that she there was anyone to help and she had accepted things as they were.

Following the inspection, officers engaged positively with the property owner and secured improvements. Electric radiators with thermostatic controls were installed in the living room and bedroom, enabling the tenant to heat her home more effectively and regulate indoor temperatures.

The tenant was also referred to the Housing Benefit team to check that she was receiving all the support to which she was entitled.

Case study 2 – Improving management standards and tenant awareness

During an inspection of another HMO, officers identified that tenants did not know who to approach when repairs were required.

Tenants were paying rent but had little or no direct contact with the landlord or managing agent. They did not know who to approach when repairs were needed, and only a small number had written tenancy agreements.

The licence holder also had limited understanding of the management responsibilities expected in a licensed HMO.

Following Council intervention, the licence holder was required to establish clear management and repair-reporting arrangements, provide tenants with appropriate information and improve compliance with HMO management requirements.

5.35 These case studies illustrate how licensing can really make a difference to some of our most vulnerable residents. The tenants we met had not heard of PHS or licensing before the inspections. This proactive approach allows us access that provides valuable intelligence that strengthens the Council's understanding of the resident's needs.

6.0 Renters' Rights Act 2025

6.1 The Renters' Rights Act 2025 represents the most significant reform of the private rented sector in a generation. It introduces stronger protections for tenants, new responsibilities for landlords and enhanced enforcement powers and duties for local authorities. Phase 1 came into force on 1 May 2026 and is now fully operational.

6.2 The next phase will introduce a mandatory national landlord and property database, requiring landlords to register themselves and their properties through the Government's Register "Your Rental Property" service. The London rollout is scheduled to begin on 15 July 2027.

6.3 The introduction of the Act marks a significant shift in the Council's role within the private rented sector. Alongside its existing role in enforcing property standards and licensing requirements, the Council now has an enhanced role in safeguarding tenants' rights and wellbeing. By strengthening security of tenure, the Act aims to provide tenants with greater stability and certainty, allowing them to make longer-term plans for their homes, families, and futures.

6.4 Brent has implemented the first phase of the Renters' Rights reforms through a coordinated approach involving Private Housing Services, Trading Standards, Housing Needs and Homelessness Services, and external partners.

6.5 A consultation led by PHS has established service responsibilities for enforcement activity and the statutory reporting of outcomes from April 2027, which is attached as Appendix 1. PHS worked closely with the Legal Team to develop a consistent approach to assessing landlord conduct when breaches of the Renters' Rights Act were discovered, ensuring enforcement decisions are fair, proportionate, and evidence-based. Examples of the areas covered is attached as Appendix 2 and Appendix 3.

6.6 PHS has introduced a new investigation framework to identify breaches of tenants' rights and support effective enforcement. Working closely with the Homelessness Service, the Council has also established an early intervention and triage process, enabling mediation between landlords and tenants before issues escalate into formal breaches or homelessness. This approach has successfully resolved a number of cases without the need for formal enforcement action.

6.7 So far, PHS has received 13 tenant rights-related service requests, including eight reports of harassment and three reports of illegal eviction. Investigations have substantiated two cases of illegal eviction, with further investigations ongoing.

6.8 The introduction of the national landlord database is expected to strengthen the Council's ongoing work to improve PRS data. This will build on the data-cleansing programme started in 2025, which has enabled the service to target its response towards more residents who need support.

6.9 **Implementation Challenges -** The introduction of new legislation inevitably brings operational and financial challenges. Implementing the Renters' Rights Act has required additional resources, including extra funding, specialist officer capacity and the development of new enforcement skills.

6.10 PHS has developed a new civil penalty calculation matrix for use by officers when issuing civil penalties. The matrix reflects government guidance and provides a clear framework for determining the appropriate starting penalty for each offence before aggravating and mitigating factors are considered.

6.11 The Act introduces new offences that can attract significant financial penalties. Investigating and pursuing these cases requires additional specialist expertise that is not currently available within the service. The service is developing a workforce and skills plan to ensure that the specialist capacity required to discharge these new enforcement responsibilities is in place.

6.12 Investigations can be lengthy and complex, often requiring detailed evidence gathering and support from external partners, including the police. Securing this support when required can also be challenging, potentially affecting the speed and progress of enforcement action.

6.13 Brent has received New Burdens funding from Government to support implementation; however, there is currently no guarantee of continued funding for the ongoing costs of these responsibilities.

6.14 Like other local authorities, Brent must therefore consider how to resource these additional responsibilities alongside its existing statutory duties. However, Brent does, benefit from an established property licensing framework, which provides an existing source of fee income to support regulatory activity where licensing and wider enforcement responsibilities overlap.

6.15 A further challenge will be integrating the new national landlord database with the Council's existing licensing and enforcement records. This will require investment in systems, data management and effective information-sharing arrangements to ensure that information can be accessed and used across relevant services.

6.16 The longer-term priority for Private Housing Services is to use these opportunities to develop a more integrated and intelligence-led approach to regulation. Aligning the national register with Brent's licensing and enforcement databases will improve the Council's ability to identify non-compliant landlords, target interventions and respond to risks more quickly. This will help make enforcement timelier and more cost-effective, ensuring that available resources are used effectively to deliver better outcomes for residents.

7.0 Key Developments and Future Priorities

7.1 The private rented sector continues to evolve, with recent changes in regulatory responsibilities and the wider political landscape influencing both landlords and tenants. It is recognised that some landlords exited the market ahead of the

implementation of the Renters' Rights Act. At the same time, there are indications that new entrants to the sector are increasingly professional landlords, companies, and property owners or managers who may have limited experience of operating within the private rented sector.

7.2 The priority for Private Housing Services is to build on the strong foundations established through its landlord and stakeholder engagement programme. This work is already underway through the provision of more regular online updates, guidance and information. The service also plans to deliver a series of targeted webinars and engagement events to raise awareness of legal requirements, promote good management standards and strengthen engagement with both existing landlords and new entrants to the market.

7.3 The immediate priorities are:

7.3.1 **Increasing licensing coverage and compliance -** Continue to increase licensing uptake and identify properties operating without the required licence. Use data cleansing, intelligence gathering, targeted inspections and enforcement to bring more properties within the regulatory framework.

7.3.2 **Strengthening enforcement and landlord accountability -** Continue the commitment to inspecting licensed HMOs and selectively licensed properties, identifying hazards and securing improvements. Ensure that the service remains focused on protecting tenants as well as improving property conditions. Increase our focus on tackling rogue landlords.

7.3.3 **Implementing the Renters' Rights Act –** Prepare for implementation of the national landlord database from July 2027 and ensure that the Council has the capacity, specialist skills and enforcement arrangements required to discharge its new statutory responsibilities effectively. Partnership working across Private Housing Services, Trading Standards, Housing Needs, the police and tenant support organisations will be strengthened so residents understand their rights and can access support at an early stage. This coordinated approach will strengthen enforcement against non-compliant landlords, improve tenants' experience and help prevent homelessness.

7.3.4 **Maintaining financial and operational sustainability -** Ensure that the licensing programme remains financially sustainable and that available resources are directed towards inspections, property improvements and enforcement. Assess the additional staffing, skills and funding required to meet the Council's increasing statutory responsibilities.

8.0 Conclusion

8.1 The Council has made significant progress in strengthening the regulation of Brent's private rented sector. The introduction of borough-wide property licensing has enabled a shift from a predominantly reactive, complaints-led approach to a more proactive model, supported by property inspections, landlord engagement and targeted enforcement. The increase in inspections, improvements secured across thousands of properties and action taken against serious and persistent offenders demonstrate the impact of this approach. Importantly, the tenant-first approach has also enabled officers to identify problems that residents may not otherwise have reported, securing practical improvements and helping vulnerable tenants access support.

8.2 However, the scale of the private rented sector and the continuing evidence of poor housing conditions mean that this work must be sustained and developed further. The

Renters' Rights Act 2025 adds to the Council's responsibilities, requiring greater capacity to investigate breaches of tenants' rights and take effective enforcement action.

8.3 The next stage should therefore build on the foundations established through licensing by increasing coverage, maintaining a strong programme of proactive inspections, targeting the landlords and properties presenting the greatest risks, and strengthening the Council's intelligence through better use of data and integration with the national landlord database.

8.4 To deliver this effectively, the Council must ensure that Private Housing Services has the specialist skills, staffing, systems and sustainable funding needed to meet both its existing responsibilities and the new demands arising from the legislation.

8.5 The direction of travel remains clear: to use the Council's regulatory powers proactively, intervene where residents are at risk, support responsible landlords to meet their obligations and take firm action against those who do not. This will help ensure that private renting in Brent provides safe, decent and properly managed homes, and that residents are protected regardless of who their landlord is

9.0 Financial Considerations

9.1 This service is funded through licence fees, which are intended to recover the costs associated with the administration of licensing schemes, inspections, compliance and enforcement activity, legal services, IT systems, landlord engagement, and the staffing and infrastructure required to deliver these functions.

9.2 Licence fee income received this year to date is £2.2 million, with total income forecast to reach £4 million this year. This income is reinvested in licensing and associated regulatory activity, supporting improved housing standards, compliance, and tenant protections across the borough. Any income generated that exceeds the costs of providing this service in the financial year is placed into a reserve and will be used to fund licensing activities over the full length of the designation and beyond.

9.3 The introduction of the Renters' Rights Act has created additional statutory responsibilities for the Council, with associated requirements for specialist staffing, training, legal support and systems investment. Although the Council has received initial New Burdens funding from Government, there is no guarantee that this funding will continue at a level sufficient to meet the ongoing costs of enforcement. The service will therefore need to keep the financial implications of these additional responsibilities under review.

9.4 Licence fee income is ring-fenced, it can only be used to support licensing and related regulatory activities. The service will need to continue monitoring licensing income and expenditure, alongside the additional costs arising from changes in legislation, to ensure that the service has sufficient resources to meet its existing commitments and emerging statutory responsibilities.

10.0 Legal Considerations

10.1 The relevant legal considerations are addressed within the substantive sections of this report and are therefore not repeated here.

11.0 Equity, Diversity & Inclusion (EDI) Considerations

11.1 A full Equality Analysis (EA) was completed as part of the licensing consultation process. This assessed the potential impact of the proposals on people with protected characteristics and identified appropriate measures to mitigate any adverse effects. The outcomes of the assessment were taken into account in the implementation of licensing and as well as the recommendations set out in this report.

12.0 Climate Change and Environmental Considerations

12.1 The work of Private Housing Services supports the Borough Plan priority of "A Cleaner, Greener Future" by promoting improvements to the condition and management of privately rented homes. Proactive inspections and landlord engagement provide opportunities to identify poor heating, inadequate ventilation and other property deficiencies, and to secure appropriate remedial works. Where these improvements increase energy efficiency, they can help reduce energy consumption and associated carbon emissions, while making homes more comfortable and affordable to heat.

12.2 The report identifies poor energy efficiency as a contributing factor to fuel poverty in Brent. Improving housing conditions therefore has both environmental and social benefits, particularly for households struggling with energy costs. The Council's licensing and enforcement activity provides a framework for securing property improvements, while its landlord engagement programme offers opportunities to promote more sustainable property management. However, the report does not quantify energy savings or carbon reductions, and these should be described as potential benefits rather than measured outcomes.

13.0 Human Resources/Property Considerations

13.1 The regulation of Brent's private rented sector is delivered through three operational teams within Private Housing Services: Licensing and Enforcement Processing, Licensing Compliance and Enforcement.

13.2 The service has a combined establishment of approximately 50 officers, including team leaders, distributed as follows:

Team	Staffing	Main responsibilities
Licensing and Enforcement Processing	23	Licence applications, service requests, complaints, coordination of inspections and administrative support for enforcement.
Licensing Compliance	13	Proactive property inspections, monitoring licensing conditions and securing compliance.
Enforcement	13	Complex investigations, formal enforcement, prosecutions and action against serious housing offences.
Total	**49**	

13.3 The service requires a combination of administrative, technical and specialist enforcement skills. Some functions involved in bringing the worst offending landlords to account require specialist training and experience.

13.4 Recruitment into these specialist roles is challenging across the sector. PHS has responded by developing an internal training and workforce development programme, as well as employing apprentices in the past 2 years, who we have supported to achieve formal housing qualifications.

14.0 Communication Considerations

14.1 A comprehensive communication and engagement plan was developed to support the borough-wide property licensing scheme, increase licensing uptake, improve landlord compliance and raise standards across Brent's private rented sector

14.2 The Council aims to increase the proportion of licensed privately rented properties from 59% to 70% by April 2027, helping ensure more homes are safe, well-managed and legally compliant.

14.3 The plan will ensure residents, all stakeholders with an interest in the private rented sector understand the scheme, their responsibilities and how to engage with the Council,

14.4 Appendix 4 sets out the overall communications and engagement strategy, while Appendix 5 provides the detailed 12-month operational plan for phase two of the scheme, including targeted campaigns and opportunities linked to the Renters 'Rights Act 2025.

14.5 Communications will be intelligence-led, using licensing data and local intelligence to target resources where they are most needed. By increasing licensing coverage and identifying unlicensed properties, the plan will support more effective enforcement and create a more stable rental market in Brent, where residents have the confidence, of good quality homes that they need to thrive.

Report sign off:

Tom Cattermole
Corporate Director of Residents and Housing Services

This page is intentionally left blank

Renters' Rights Act 2025

Mapping of teams responsible for Enforcement from 1st May 2026

Offence or Breach	Team enforcing in this council		
	PHS Enforcement Team	Trading Standards	Homelessness/ Tenancy Relations
1. unlawful eviction and harassment of occupier as defined under the **Protection from Eviction Act 1977**	PHS Enforcement Team – will enforce established offences	NA	Yes – core territory When a resident reports an unlawful eviction or harassment, we act as the first response point: we assess immediate safety and homelessness risk, establish whether there is an occupier with residential status/rights, and identify what the landlord (or agent) has actually done or is threatening to do. If there is an immediate risk of eviction that day, we prioritise urgent intervention, taking steps to prevent homelessness. Where the eviction has already occurred, we treat it as an urgent relief matter alongside tenancy relations enforcement considerations (Hodge Jones and Allen).
2. failure to give a written statement of terms under **section 16D of the Housing Act 1988**	PHS Enforcement Team – will enforce established offences	NA	Somewhat – more as a triage and advisory function than a lead enforcement area

3. failure to give an existing tenant information about changes made by the Renters' Rights Act under **paragraph 7(2) of schedule 6 to the Renters' Rights Act 2025**	PHS Enforcement Team – will enforce established offences	NA	As above
4. attempting to let a property for a fixed term under **section 16E of the Housing Act 1988**	PHS Enforcement Team – will enforce established offences	NA	
5. attempting to end a tenancy orally or by service of a notice to quit under **section 16E of the Housing Act 1988**	PHS Enforcement Team – will enforce established offences	NA	Yes – this affects the service, but specifically as a front door triage and prevention function, not as lead regulatory enforcement. We would provide early intervention and prevention activity, including informal engagement with landlords where appropriate, but would not investigate or enforce this breach. We would manage triage, advice and prevention activity. Cases meeting the threshold for enforcement would be referred to PHS.
6. serving an eviction notice that attempts to end a tenancy outside the prescribed section 8 process under **section 16E of the Housing Act 1988**	PHS Enforcement Team – will enforce established offences	NA	Yes, this affects the service as a triage and prevention function, as it directly relates to threatened or attempted eviction. However, it does not sit with the service as lead enforcement responsibility.

			We may engage informally with the landlord or agent to explain the correct legal process and discourage further unlawful action, but we would not routinely investigate or pursue enforcement action for the breach itself. A referral would be made to PHS
7. relying on a ground where the person does not reasonably believe that the landlord is/will be able to obtain possession under **section 16E of the Housing Act 1988**	PHS Enforcement Team – will enforce established offences	NA	Only indirectly. Our involvement would be limited to assessing the validity and credibility of possession claims where they arise in the context of threatened homelessness.
8. relying on a ground knowing the landlord would not be able to obtain possession or being reckless as to whether they would under **section 16J of the Housing Act 1988**	PHS Enforcement Team – will enforce established offences	NA	No. This does not sit with the service either as a lead or shared responsibility. This provision relates to knowledge, recklessness, and intent, which places it firmly within formal enforcement and legal decision-making.
9. failing to provide a tenant with prior notice that a ground which requires it may be used under **section 16E of the Housing Act 1988**	PHS Enforcement Team – will enforce established offences	NA	Somewhat - only in so far as it impacts the validity of possession action. It does not sit with our service as a lead enforcement responsibility. We would advise tenants that the ground may not be relied upon and assess whether the threatened eviction is

			therefore premature or invalid. We would not proactively pursue compliance or enforcement action in relation to the failure itself.
10. reletting or remarketing a property before expiry of the 12 month no-let period after using the moving and selling grounds under **sections 16E and 16J of the Housing Act 1988**	PHS Enforcement Team – will enforce established offences	NA	x
11. failure to comply with an Improvement Notice under **section 30 of the Housing Act 2004**	PHS Enforcement Team	NA	x
12. offences in relation to licensing of houses in multiple occupation (HMOs) under **section 72 of the Housing Act 2004**	PHS Enforcement Team	NA	x
13. offences in relation to licensing of other houses under **section 95 of the Housing Act 2004**	PHS Enforcement Team	NA	x
14. contravention of an overcrowding notice under **section 139 of the Housing Act 2004**	PHS Enforcement Team	NA	x
15. failure to comply with management regulations in respect of houses in multiple occupation under **section 234 of the Housing Act 2004**	PHS Enforcement Team	NA	.x
16. breach of a banning order under **section 21 of the Housing and Planning Act 2016**	PHS Enforcement Team		No – this does not sit with the service in any capacity.

17. discriminating against prospective tenants during the letting process on the grounds that those tenants are in receipt of benefits or have children under **sections 33 and 34 of the Renters' Rights Act 2025**	If Landlord, Refer to PHS	Trading Standards – limited to Letting Agents	No – this does not sit with the service in any capacity. Take case to prevent offence. And/Or Refer offence to PHS Where allegations of discrimination arise during homelessness prevention or advice work, our role would be limited to: • acknowledging the concern, and • referring or signposting the individual to PHS
18. marketing a letting without stating the proposed rent under **section 56 of the Renters' Rights Act 2025**	If Landlord, Refer to PHS	Trading Standards – limited to Letting agents	No – this does not sit with the service in any capacity.
19. inviting or encouraging any person to offer to pay an amount of rent under the proposed letting that exceeds the stated rent under **section 56 of the Renters' Rights Act 2025**	If Landlord, Refer to PHS	Trading Standards- limited to letting agents	No – this does not sit with the service in any capacity.
20. accepting an offer from any person to pay an amount of rent under the proposed letting that exceeds the stated rent under **section 56 of the Renters' Rights Act 2025**	If Landlord, Refer to PHS	Trading Standards – limited to letting agents	No – this does not sit with the service in any capacity.

This page is intentionally left blank

A note regarding factors that may be considered as "harm caused" and "financial incentive" in specific types of breaches when determining the appropriate civil penalty amount.

Assessment of potential harm and financial incentive (identified breaches)

This note is consistent with the statutory guidance and serves to accomplish the following objectives:

It assesses (1) potential harm and (2) potential financial incentive arising from the breaches listed below using the statutory guidance's suggested harm lenses: the level of risk to tenants' safety and wellbeing, whether that risk materialised, and tenant vulnerability. Financial incentive is considered in line with the principle that it should not be in the offender's financial interest to breach rather than comply (for example, retaining rent, avoiding costs, or extracting higher rent).

Working definition (financial incentive): *for the purposes of this report, "financial incentive" as per the statutory guidance means the estimated profit or financial benefit attributable to the breach during the relevant period (for example, additional rent obtained, avoided compliance/administration or remediation costs, reduced voids, or other monetisable advantage). Where sufficiently reliable evidence exists, any profit identified should generally be treated as establishing a minimum level for the penalty (with the final penalty typically higher once punishment and deterrence are taken into account). The absence of an identifiable financial benefit does not, by itself, justify reducing the penalty.*

Breaches, Harm Pathways, and Incentives

Breach (as listed)	Key harm pathway (risk to safety/wellbeing)-	Whether risk may materialise (examples)	Tenant vulnerability factors	Potential financial incentive / benefit	Suggested Matrix implications (

	wording from guidance				***these are just my thoughts*** **)**
Failure to give a written statement of terms and other prescribed information (Housing Act 1988, s16D)	Primarily wellbeing (security, ability to assert rights). Indirect safety risk where lack of written terms obscures responsibilities for repairs/safety checks, or delays escalation.	Risk materialises where the tenant cannot evidence key terms (rent due, notice arrangements, deposit/fees, repair reporting route), leading to arrears, disputes, delayed repairs, or reluctance to complain.	Higher impact for tenants with limited English/literacy, first-time renters, people with cognitive impairment, or those reliant on advice services; also where power imbalance is high (threats of eviction, immigration concerns).	Reduced admin/compliance effort; scope to impose/alter terms informally; increased leverage in disputes (e.g., about rent, deductions, responsibilities).	**Harm** : mid point start, higher if there are any vulnerability issues and lower if mitigating factors emerge --- - **Financial Incentive** : could be low if you want a 1 or 2 as admin cost is the most blatant
Failing to provide a tenant with prior notice that a	Wellbeing (housing security, stress) and potential safety	Materialises where a tenant is surprised by proceedings/ notice and	Higher impact for families with children, people with	Facilitates faster or easier route to possession (or perceived leverage)	**Harm** : mid point start, higher if there are

ground which requires it may be used (Housing Act 1988, s16E)	impacts where loss of housing stability leads to unsafe alternatives or homelessness risk.	cannot plan, seek advice, or mitigate; may precipitate rent arrears, disruption to work/school, or crisis accommodation.	disabilities/ health conditions, older tenants, survivors of domestic abuse, and those with limited support networks or limited access to legal advice.	without compliance steps; may reduce void periods by accelerating turnover.	any vulnerability issues and lower if mitigating factors emerge - **Financial Incentive** : mid point start as possible reduction in void periods is a real financial incentive
Failure to give an existing tenant prescribed information about changes made by the Renters' Rights Act 2025 (RRA 2025, Sch	Wellbeing: tenants may not understand updated rights/obligations, redress routes, or protections, reducing their ability to act on safety/repair or challenge	Materialises where tenants operate under outdated assumptions (e.g., about notice, processes, or permitted practices), leading to missed opportunities to	Higher impact for tenants with low legal literacy, language barriers, limited digital access, or reliance on informal advice; also where landlord	Maintains informational advantage; reduces likelihood of challenge/complaints; may allow continuation of practices that would change if tenant understood the regime.	**Harm** : mid point start, higher if there are any vulnerability issues and lower if mitigating factors emerge

6 para 7(2))	unlawful practices.	prevent/stop harm.	behaviour is intimidating.		- **Financial Incentive** : mid point start as possible reduction in likelihood of challenge is a financial incentive ..less costs getting legal advice or addressing problems
Discrimination relating to children in the lettings process (RRA 2025, s33)	Wellbeing: exclusion from housing, overcrowding risk, instability, adverse impacts on children's health/education. Indirect safety risk	Materialises when families are refused viewings/lets or steered away, resulting in delayed access to stable housing, temporary	Families with young children, single parents, larger households, and those already in insecure housing; heightened where	Ability to select tenants perceived as lower wear-and-tear or management burden; avoidance of perceived costs (repairs, complaints, insurance/mortgage issues).	**Harm** : 4 point start, higher if there are any additional vulnerability issues and lower if

	where families resort to unsuitable/unsafe housing.	accommodation, or acceptance of substandard housing.	there is limited local supply.		mitigating factors emerge - **Financial Incentive** : 4 start as possible avoidance of costs and management fees is a real financial incentive
Discrimination relating to benefits in the lettings process (RRA 2025, s34)	Wellbeing: exclusion from housing, instability, poverty impacts. Indirect safety risk where applicants enter informal/unsafe arrangements or overcrowding.	Materialises where applicants on benefits are refused or filtered out, increasing time in temporary accommodation, homelessness risk, or acceptance of poor conditions.	People with disabilities/long-term illness, single parents, older people, migrants with limited support, and those with prior homelessness.	Perceived risk-management (income volatility) and admin avoidance; potential to secure higher-income tenants and reduce arrears risk.	Same as above **Harm** : 4 point start, higher if there are any additional vulnerability issues and lower if mitigatin

					g factors emerge - **Financial Incentive** : 4 start as possible avoidance of costs and management fees is a real financial incentive
Failure to specify proposed rent within a written advertisement or offer (RRA 2025, s56)	Wellbeing (transparency, ability to budget/avoid exploitation). Indirect safety risk where unaffordable housing leads to arrears and instability.	Materialises where tenants incur costs without clarity on affordability, or face higher rent expectations later; can facilitate rental bidding.	Higher impact for low-income households, those with limited transport/digital access, and those in urgent housing need.	Enables testing the market and extracting higher rent or encouraging bidding; increases bargaining power.	**Harm**: mid-point start, higher if there are any vulnerability issues and lower if mitigating factors emerge - **Financial Incentiv**

					e: mid-point start and higher if any questionable conduct is discovered ..eg encouraging a bidding war

Using this table in casework: for each breach, officers can record (a) what the baseline risk is, (b) whether and how it materialised for the tenant(s) in the case, (c) any vulnerability indicators, and (d) any identifiable financial benefit (e.g., avoided compliance/admin costs, increased rent, reduced voids, or leverage to secure possession). Where reliable evidence of profit/benefit is available, it can be used as a minimum reference point when considering the final penalty, alongside deterrence and punishment objectives.

Thanks Tola

This page is intentionally left blank

Civil Penalty Notices: what they are and how Brent uses them

A snapshot for Cabinet on the civil penalty regime under the Renters' Rights Act 2025

What a Civil Penalty Notice is

A CPN is a financial penalty the Council can impose on a landlord or letting agent **as an alternative to prosecution** when a housing offence or breach is proven to the required standard. The **Renters' Rights Act 2025 (RRA)** extended the civil penalty regime: it created new breaches for private landlords, covering how tenancies are let and ended, rental discrimination and rental bidding, and raised the maximum penalty for housing offences from **£30,000 to £40,000** for offences committed from 1 May 2026. The previous maximum still applies to offences committed before that date. Breaches carry a maximum of **£7,000** each.

Offences, breaches and the maximum penalties

Type	What it covers	Starting point	Maximum
Tenancy and letting breaches (RRA 2025)	Letting on a fixed term; ending a tenancy by notice to quit, orally or outside the section 8 process; relying on a ground without reasonable belief; no written statement of terms; refusing tenants with children or on benefits; not stating the rent in an advert; accepting offers above the advertised rent	£3,000 to £6,000	£7,000
Serious tenancy offences	Unlawful eviction and harassment (Protection from Eviction Act 1977); relying on a possession ground knowing it cannot succeed (s16J(1)); re-letting or re-marketing within the 12-month no-let period (s16J(2))	£25,000 to £35,000	£40,000
Property conditions and licensing (Housing Act 2004)	Not complying with an improvement or overcrowding notice; unlicensed HMO or selectively licensed property; HMO over-occupation; HMO management failures; breaching licence conditions (starting points set locally)	£3,000 to £25,000	£40,000
Banning orders (Housing and Planning Act 2016)	Breaching a banning order	£35,000	£40,000

Starting points come from the national guidance and are built into the CPN Matrix. A continuing or repeat breach uses a higher starting level and is referred to the Enforcement Manager and Legal Services before calculation.

How a penalty is scored

Officers use the **CPN Matrix**, a controlled tool that applies the same rules to every case so that the same facts always produce the same penalty:

1. **Offence and starting point.** The officer selects the offence or breach; the legislation, starting point and statutory maximum load automatically.
2. **Four statutory factors.** Each is scored for mitigation and aggravation: deterrence and future compliance; financial benefit, landlord profile and scale; offence history, conduct and tenant impact; harm, risk and vulnerability.
3. **Adjustment.** For each factor and each side: no evidenced factors **0%**, one or two **5%**, three or more **10%**. Mitigation reduces and aggravation increases the starting point.
4. **Final penalty.** The lower of the adjusted figure and the statutory maximum. The Matrix calculates it; officers never adjust by hand. Prompt payment may attract a discount of up to a third.
5. **Assurance and approval.** Checks on financial benefit, deterrence and totality, then review by the Enforcement Manager and approval by the Head of PHS before any Notice of Intent is issued.

Mitigating and aggravating factors

For each offence the Matrix offers a controlled list of factors drawn from the guidance. An officer may only select a factor that is **supported by evidence** and must record an evidence note for it. The notes are printed in the Notice of Intent, so the landlord sees why the penalty was adjusted and can respond.

Statutory factor	Mitigating examples (reduce)	Aggravating examples (increase)
Deterrence and future compliance	Prompt remedy; early acceptance of responsibility; credible steps to prevent recurrence	Failure to cooperate; conduct continued after a warning; obstruction or misleading information
Financial benefit, landlord profile and scale	No significant financial gain; small-scale landlord with an isolated issue	Rent received while non-compliant; licence or repair costs avoided; professional or portfolio landlord
Offence history, conduct and tenant impact	No previous enforcement; good compliance record; minor isolated incident	Previous formal action; repeat or prolonged non-compliance; tenant pressured or misled
Harm, risk, vulnerability and adverse impact	Low risk to safety; risk did not materialise; hazards removed promptly	Category 1 hazards; vulnerable tenants; loss of home, threats or harassment

Worked example. Unlawful eviction, starting point £35,000. Three evidenced mitigating factors under deterrence (−10%) and one aggravating factor (+5%) give a net −5%: proposed penalty **£33,250**, within the £40,000 maximum (about £22,168 if paid promptly).

Safeguards and assurance

Every assessment is recorded and versioned, so any change can be traced and compared. No Notice of Intent is issued until the Head of PHS has approved the penalty. Landlords have 28 days to make representations before a Final Notice and may appeal a Final Notice to the First-tier Tribunal. The process is audited quarterly and aligned with ISO 9001:2015. **Page 2** shows the explanation of the assessment that landlords receive with every Notice of Intent.

Brent Civic Centre
Engineers Way
Wembley
Middlesex, HA9 0FJ
TEL:
WEB: www.brent.gov.uk

Civil Penalty Notice Matrix

How the proposed financial penalty has been assessed

The Council has assessed the proposed penalty in accordance with the Government's statutory guidance on civil penalties, taking into account the nature and seriousness of the offence, the circumstances of the case, any mitigating or aggravating factors, the impact of the offence and the need to ensure the penalty is proportionate and acts as a deterrent.

The proposed penalty is based on the evidence gathered during our investigation. You may make written representations within the period specified in this Notice of Intent.

Assessment method

Assessment stage	What this means
1. Breach or offence and starting point	The government has imposed a starting point for each offence and breaches.
2. Mitigating and aggravating factors	These are factors that the Council will consider, that may reduce or increase the penalty, based on the evidence available.
3. Financial considerations	The Council considers whether the proposed penalty is sufficient to remove any financial benefit from non-compliance and to deter future non-compliance.
4. Final review	This is a quality assurance check to ensure that the penalty is fair, proportionate, is supported by evidence. The review takes into account, the circumstances of the case as a whole.

Matrix calculation adjustment

The table below explains how the Matrix applies mitigating and aggravating factors to adjust. The adjustment will be made to the offence starting point based on relevant mitigating or aggravating factors. Reasons for adjustment will be supported by evidence.

Assessment area / factor	What is the Council will consider	Mitigating factor adjustment	Aggravating factor adjustment
Deterrence and future compliance	Whether the proposed penalty is sufficient to deter the person from committing the offence again and encourage future compliance	No relevant mitigating factors identified or evidenced: **0%** 1–2 relevant mitigating factors identified and evidenced: -5% 3 or more relevant mitigating factors identified and evidenced: -**10%**	No aggravating factors identified or evidenced: **0%.** If 1 or 2 aggravating factors are identified and evidenced: +5%. If 3 or more are identified and evidenced: +10%.
Financial benefit / compliance gain	Whether the person has benefited financially, avoided costs or gained an advantage as a result of the breach/offence.	No mitigating factors identified or evidenced: **0%.** 1 or 2 mitigating factors are identified and evidenced: -5%. 3 or more are identified and evidenced: -10%.	No aggravating factors identified or evidenced: 0%. If 1 or 2 aggravating factors are identified and evidenced: +5%. If 3 or more are identified and evidenced: +10%.
Conduct, history and pattern of compliance	The person's conduct and engagement, previous compliance history and any pattern of non-compliance.	No mitigating factors identified or evidenced: 0%. If 1 or 2 mitigating factors are identified and evidenced: -5%. If 3 or more are identified and evidenced: -10%.	No aggravating factors identified or evidenced: 0%. If 1 or 2 aggravating factors are identified and evidenced: +5%. If 3 or more are identified and evidenced: +10%.
Harm, risk, vulnerability or adverse impact	Any actual or potential harm, risk to safety or wellbeing, vulnerability of tenants, or wider adverse impact arising from the breach or offence.	No mitigating factors identified or evidenced: 0%. If 1 or 2 mitigating factors are identified and evidenced: -5%. If 3 or more are identified and evidenced: -10%.	No aggravating factors identified or evidenced: 0%. If 1 or 2 aggravating factors are identified and evidenced: +5%. If 3 or more are identified and evidenced: +10%.

Brent



Communications Plan Borough-wide selective licensing in Brent 2024

Campaign objectives

- To generate 20,000 selective licensing applications between 1 April 2024 and 31 March 2025
- To generate 40,000 selective licensing applications over five years beginning 1 April 2024
- To ensure landlords who rent in Brent understand that it is a legal requirement to have selective licence.

Use this section to outline your audiences and any insights you have on them

Audience insight

Primary: Landlords who let properties in Brent.

Secondary: Organisations working with landlords in Brent. E.g. Letting agents.

Tertiary: Tenants who rent from landlords in Brent and tenants' advocacy organisations. E.g. London Renters Union, Advice4Renters, London Property Licensing, etc.

Quaternary: Regional, trade and London media (they can help spread the message to landlords).

Strategy

Use this section to outline your strategy – use the insight to set out the approach you will apply. You will also need to cover proposition/messaging and channels.

PRE-LAUNCH: 1 FEB – 1 APRIL 2024

Three-word slogan: Landlords, Get Licensed.

Secondary tagline: From 1 April 2024, every landlord will need a licence to Rent in Brent.

Tertiary tagline: Rent with confidence. Apply online today

www.brent.gov.uk/getlicensed

LAUNCH: 1 APRIL 2024 TO 1 APRIL 2025

Three-word slogan: Landlords, Get Licensed.

Secondary tagline: Every landlord needs a licence to Rent in Brent. It's the law.
Tertiary tagline: Rent with confidence. Apply online today

www.brent.gov.uk/getlicensed

Brent Strategy

Use this section to outline your strategy – use the insight to set out the approach you will apply. You will also need to cover proposition/messaging and channels.

TARGETING TENANTS: 1 OCT 2024 – 31 MARCH 2025

Tagline: Ask your landlord.

Secondary tagline: Rent with confidence. Every landlord needs a licence to Rent in Brent.

Tertiary tagline: Let your landlord know they now need a license to rent. It's the law. www.brent.gov.uk/getlicensed

(From 2025): Check here to see if your home is licensed: (TBC.)

If your landlord is unlicensed, let us know:

www.brent.gov.uk/getlicensed

TARGETING RESISTERS: 1 APRIL 2025 – 31 MARCH 2026

Three-word slogan: Landlords, Get Licensed.

Secondary tagline:Unlicensed is unlawful. Every landlord needs a licence to Rent in Brent. Don't lose your livelihood.

Tertiary tagline: £640 for a five-year licence or maximum fine of £30,000. Don't get a criminal record. We will find you if you're a landlord and unlicensed. Apply online today and avoid prosecution. www.brent.gov.uk/getlicensed

Brent

Use this section to outline your strategy – use the insight to set out the approach you will apply. You will also need to cover proposition/messaging and channels.

Strategy

Phased campaign: Coming soon (Feb – 1 April), Launch (1 April – summer), It's live (end of summer – 31 March 2024).

Channels: Digital, socials, JCDecaux, Brent Mag, Brent e-newsletters, press releases, library & atrium screens, e-signature, programmatic advertising, targeted audience letters (eg to letting agents).

Regular three-month reviews of comms based on number of applications received: For example, if the number of applications received is lower than anticipated by the end of phase two, we can ramp up the comms to landlords and tenants.

Audiences

Use this section to set out the journey you want your Audience to go on as a result of your communication activity

Audience	Think	Feel	Do	How
Eg - working mums	More support available to help with childcare	Govt understands their needs and is working to address them	Increase in satisfaction with childcare offer	• Targeted paid social posts to audience • Drumbeat of events, news stories
Landlords	Landlords, Get Licensed.	Selective licensing is the law in Brent	Apply for a licence today	• Targeted PR campaign with, social posts, newsletters, printed leaflets, ads, etc. • Drumbeat of timeline with news stories, posts, with enforcement action messaging as campaign passes the first few months of the launch.
Tenants	Brent is improving living standards in the private rented sector	We want to protect renters' rights and level the playing field	Ask your landlord if they are licensed	• Targeted campaign with, social posts, newsletters, printed leaflets, ads, etc following phased timeline.

Evaluation

Use this section to outline your evaluation approach. Follow the GCS Evaluation framework to set out how you evaluate your communications

inputs	Outputs	Outtakes	Outcomes	Organisational Impact
Eg - content development	No. of articles or broadcasts	Awareness of issues	Advocacy by third parties	• Uptake of service provided
Comms tactics for pre-launch and launch	2,000 applications in first week of live date	Engaged landlords responding	* Applications team processing	* Employment of additional processing officers (8?)
Comm for April 2024	3556 applications at the end of 1st month	Engaged landlords responding	On track but need to maintain momentum	* Team processing

Campaign business case (2026/27): Landlord licensing

Cabinet Member sponsor	Cllr Robert Johnson
Corporate Director sponsor	Tom Cattermole
Service area and lead	Private Housing Services Triza Handa Spencer Randolph
Purpose and background	All rented properties in Brent must now be licensed (except for single household properties in Wembley Park). Brent operates three licensing schemes: - **A Selective Licence** - required for properties rented out to a single household, such as a family home - **A Mandatory Licence** - required for larger HMOs with five or more people from two or more households - **Additional HMO licensing scheme** - required for smaller Houses in Multiple Occupation (HMOs) with three or four people from two or more different households (introduced 2 February 2026) To get licensed, landlords must show they meet certain standards, including safe housing conditions and proper management arrangements. The council inspects properties once applications are received, sets conditions that landlords must follow, and can take enforcement action if standards are not met. This helps ensure rented homes are safe and properly managed. There has been good uptake of licences to date, however, a continued communications campaign is needed to maintain awareness, increase compliance, and ensure all landlords are appropriately licensed.
What have you tried so far to achieve this and what challenges or barriers have you encountered?	Approach: A number of communications campaigns have been delivered alongside the introduction of the various schemes. Following the introduction of the Additional HMO Licensing Scheme in February 2026, all landlords are now required to be licensed. In response, a new

	campaign was launched with one simple message: All landlords must be licensed - it's the law. This broader approach, with one clear message has helped reach a wider pool of landlords and increase applications across the Selective, Mandatory, and Additional HMO schemes. A range of communications activity has helped drive applications, including spotlighting successful prosecutions and highlighting enforcement officers in action across our channels. Barriers / potential challenges: • Compliant landlords are largely already engaged and licensed • Difficulty in reaching non-compliant landlords via traditional channels • Data availability - data and intelligence needed to support targeted communications in hotspot areas
Corporate objective **Mandatory**	Prosperity and stability in Brent
Desired outcome(s) **Mandatory**	• 70% of all privately rented properties in the borough to be licensed by April 2027 (previously 65% we have increased the target) • Better standards in the private rented sector
Return on investment **Mandatory** - *Reducing demand on council services* - *Generating savings* - *Supporting income generation* - *Improving community safety and wellbeing*	• Supporting income generation
Data and insight **Mandatory**	• Following the introduction of the Additional HMO Licensing Scheme in Feb 2026 and our clear message that all landlords must now be licensed, between February-May 2026, the council received 2,557 new applications, generating £1,326,290 in income • Total number of private rented properties in Brent - 47,130 (as of June 2026) ○ 27,902 - 59% of all properties licensed and 65% of HMOs

	○ Selective – 23,253 of 40,000 eligible properties (58%) ○ Mandatory – 2,405 of 3,494 eligible properties (68%) ○ Additional – 2,244 of 3,636 eligible properties (61%) 19,228 unlicensed properties remaining • 5,686 unlicensed properties have expired licences • Low compliance hotspot areas ○ Queens Park – 48% compliance (589 properties require a license) ○ Harlesden & Kensal Green – 50% compliance (509 properties require a license) ○ Kilburn – 56% compliance (505 properties require a license)
Target audience	• Landlords • Private renters
Timeframe / dependencies	
Budget	£10K communications budget

Communications recommendation:

We recommend delivering a time-bound campaign. Communications activity has been successful, 59% of all privately rented properties are now licensed, delivering a clear return on investment and generating significant income for the council. We are on track to reach our target of 70% of all privately rented properties in the borough being licensed by April 2027, but we are now moving into a more challenging phase, as most compliant landlords are likely already licensed and the remaining gap is made up of harder-to-reach, non-compliant landlords. The next phase will therefore require data and insight on hotspot areas, alongside a more targeted and innovative approach to reaching the remaining unlicensed landlords. We will continue to use proven tactics, including capturing visible on-street enforcement activity and highlighting successful landlord prosecution stories, which drive awareness and lead to a significant increase in applications. For example, in October 2025 our story on a rogue landlord who failed to provide a bathroom door in one of his properties achieved 10 media hits, including regional coverage in the Evening Standard. That month, we received 817 applications, a 92% increase compared with September 2025 (424 applications). Insight suggests that a notable proportion of unlicensed properties have expired licences, meaning the landlords were previously compliant, but have not renewed their licenses. Messaging

will therefore evolve beyond encouraging landlords to 'get licensed', to also emphasise the importance of renewing licences when required.

We will also develop a dedicated strand of activity aimed at tenants, raising awareness of their rights as a whole, using the Renters' Rights Act as the foundation for this messaging. The focus will be on reaching tenants in identified hotspot areas. This will cover:

- The Renters' Rights Act - which strengthens protections for tenants in areas such as tenancy security and protection from discrimination
- Landlord licensing - which helps ensure rented homes are safe, properly managed, and meet legal requirements

Together, these messages will help tenants understand both their rights and the standards their homes should meet, and how to report concerns where landlords may not be complying with their legal obligations or minimum housing standards, including the option to provide details of their landlord (where known) to help us reach them.

	Housing Scrutiny Committee 24 November 2026
	Report from the Corporate Director of Residents and Housing Services
	Lead Cabinet Member for Housing, Homelessness and Renters - Cllr Robert Johnson

Supported Accommodation

Wards Affected:	All
Key or Non-Key Decision:	Not Applicable
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
List of Appendices:	None
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Jamie Slagel Head of Improvement – Housing Needs and Supported Accommodation, jamie.slagel@brent.gov.uk Edwin Mensah Head of Commissioning, Edwin.mensah@brent.gov.uk Olivia Brady Service Manager, Specialist Accommodation, Olivia.brady@brent.gov.uk

1. Executive Summary

1.1. To provide an update on supported accommodation provision in Brent, including Council operated schemes, schemes operated by other providers, and non-commissioned supported exempt accommodation. The report also provides an update on Brent's progress developing a Supported Housing Strategy, Needs Assessment and Delivery Plan and preparing for the new

licensing scheme, in line with the Supported Housing (Regulatory Oversight) Act 2023.

2. Recommendations

2.1. Consider and comment on the proposed approach to developing Brent's Supported Housing Strategy and discuss what Council priorities and principles they would like reflected in the strategy.

2.2. Discuss the future of how Brent manages supported housing to drive improvement in line with the Council's wider transformation vision, and realise the Supported Housing Strategy and associated delivery plan.

3. Detail

3.1. Contribution to Borough Plan Priorities & Strategic Context

3.1.1. Ensuring that residents have access to good quality supported accommodation when needed is crucial to achieving two Borough Plan priorities: Prosperity and Stability in Brent and A Healthier Brent. Housing is an underlying factor for both and some residents need support to be able to confidently live independently. Access to a secure home with care, support, and supervision can provide stability and lead to improved health outcomes. Brent Council is concerned that some supported accommodation does not meet these needs and so the work outlined in this paper contributes to both strategic goals.

3.1.2. More broadly this relates to Brent Council's ongoing work to develop and deliver a secure Medium Term Financial Plan which will require savings in the short- and medium-terms. The actions and proposals in this paper will help with achieving cost avoidance, thereby enabling the Council to deliver against its other priorities.

4. Overview

4.1. **What is supported accommodation?** The National Audit Office notes that "Supported housing is accommodation that is provided alongside support, supervision or care to help people with specific needs to live as independently as possible in the community. This includes, for example, older people, people with a learning disability, people with a physical disability, people at risk of or who have experienced homelessness, or people recovering from drug or

alcohol dependence. Supported housing can be short term or long-term, depending on a person's needs."[1]

4.1.1. "Supported accommodation" is a catch-all term that can apply to lots of different housing arrangements, including the following:

- Housing Related Support for residents who are homeless, rough sleeping, ex-offenders, using drugs and alcohol, with mental health issues, young people, and those fleeing domestic abuse
- Council-operated supported housing e.g. for rough sleepers
- Non-commissioned supported exempt accommodation (and supported exempt accommodation as a whole)
- Supported living, including for mental health, learning disabilities, and physical disabilities
- Extra care
- Sheltered and/or retired housing
- Supported lodgings
- Staying put accommodation
- 18+ supported accommodation, including for care experienced young people
- 16-17 years Ofsted-regulated supported accommodation
- Housing first schemes
- Shared lives schemes

Supported housing provides a crucial intermediate step for residents between formal care and living independently, and between being homeless and living independently.

4.2. **What is changing?** The Supported Housing (Regulatory Oversight) Act 2023 introduced a number of important reforms to the supported housing system, with a particular focus on reforming supported exempt accommodation (SEA). The Act introduced the Government's requirement of councils to develop a local supported housing strategy by end of 26/27. It also introduced the Government's intention to introduce a dedicated supported housing licensing scheme that Councils would be asked to deliver (see below, section 8.3).

5. Supported Housing Strategy

5.1. Introduction to the Supported Housing Strategy

5.1.1. Local Supported Housing Strategies must understand the local landscape of supported housing and set out the direction of travel to meet identified need. They must be underpinned by a comprehensive needs assessment of supply and demand, including current unmet need and a 5-year outlook, and

[1] Investigation into supported housing - NAO report, p.4

accompanied by a delivery plan. The Council must report annually to MHCLG on supply and demand and progress towards the delivery plan. The Council received New Burdens funding of £87,531 in 25/26 and will receive further funding in 28/29 to deliver this.

5.1.2. **Scope**: supported accommodation is a broad term and is categorised differently in different places. MHCLG require that the strategy covers supported exempt accommodation, retirement housing and sheltered housing, as well as the need for accessible/adapted homes. The strategy may also choose to include floating support services, housing first, shared lives, staying put, and supported lodgings accommodation. MHCLG have asked local authorities to shift to the following tripartite typology in future:

- Older people's supported housing e.g. extra care and retirement or sheltered housing)
- Long-term supported housing e.g. supported living
- Transitional supported housing

5.1.3. MHCLG guidance requires that the strategy is developed in collaboration with partners and that social services have a duty to help develop and deliver the strategy and its delivery plan.

5.1.4. Brent Council has done an enormous amount of work on supported accommodation, especially Supported Exempt Accommodation, since Autumn 2024. This has meant that the Council is in a good position and has taken up the mantle quickly to drive forward progress to develop the strategy, which is being led by the Director of Housing Needs and Support and Head of Improvement – Housing Needs and Supported Accommodation. The strategy is a good opportunity to drive forward work officers had previously identified - improving referral pathways, resident experience, and void turnaround while reducing rent arrears and evictions and developing plans to address gaps in provision. The following sections outline what is in train and the proposed plan for developing this strategy, and related key considerations.

5.2. Plan for developing the strategy

5.2.1. **Steering Group**: Around eight months ago, officers brought together the Supported Living Board and Supported Exempt Accommodation Programme Board to form a streamlined approach to strategic oversight of supported accommodation in the new Supported Housing Board. The new Board is taking a wide lens, also strategically considering Housing Related Support contracts, the Council's role in the new First Wave Plus supported accommodation scheme, extra care, and the supported housing system as

a whole. It has also brought in Children's representatives to ensure alignment with Children's work on 18+ supported accommodation. The Board has now taken on strategic responsibility for the supported housing system as a whole, reducing gaps, duplication and fragmentation and improving the resident journey and experience. The Board's goal is to support more residents back to independent living and improve residents' quality of life. Consequently, the Board is acting as the steering group driving strategy development and delivery.

5.2.2. **Governance**: MHCLG guidance asks LAs to choose an ultimate governance body responsible for signing off the strategy, monitoring progress, and annual submissions to MHCLG. They recommend this Board has senior staff, including Cabinet members, on it. MHCLG is giving LAs the opportunity to set up a new Governance board or use an existing one like the Health and Wellbeing Board. Officers propose that Cabinet signs off the Strategy, and that it is also reviewed and monitored by the Homelessness Forum to generate buy-in and scrutiny by partners and community organisations.

5.3. Officers are currently on track to publish before the MHCLG deadline of 31 March 2027.

5.4. **Data analysis and projections**

5.4.1. The Supported Housing Board is working with two corporate data analysts to complete projections of future need and supply to underpin the needs assessment.

5.4.2. It is important that the strategy is data-informed: data analysis of current provision, support needs, and unmet needs will also underpin the strategy, its priorities, and the delivery plan.

5.5. **Engagement with residents**

5.5.1. To underpin the strategy, officers are engaging with residents living in all kinds of supported housing. Where the Council has recently engaged with residents, officers propose to harness that work rather than risk engagement fatigue. Where the Council has not spoken to some residents recently, officers propose to host a set of engagement activities/events. It is crucial the strategy is underpinned by residents' lived experience.

5.5.2. **Surveys.** The Council's community engagement team have gone to residents by surveying them in/around their accommodation. The surveys focused on residents' experiences, what support they receive, what's working and what can improve. Officers received responses from 50

residents. Overall, residents identified that staff support is a clear strength, with residents consistently highlighting respectful, helpful staff, a strong sense of community, safety, and support to build independence, manage wellbeing, and progress in recovery. The main areas for improvement are clearer and more effective support for moving on from supported housing, with many residents expressing anxiety about future housing options, affordability, and uncertainty about the transition process. Residents also want more activities and employment support, better help with paperwork and finances, improved communication, stronger management of safety and resident conflicts, and faster responses to repairs, cleanliness, and property maintenance issues.

5.5.3. **Focus groups**. In addition, the Housing Needs and Support Department have organised a dedicated focus group with B3 and Voices for Homelessness. This session will allow for more detailed discussion about residents' experiences, priorities, and views. Staff also plan to bring a draft strategy and delivery plan to the Homelessness Forum hosted by Crisis in January.

5.5.4. In addition, the Council is using New Burdens funding to fund 2x Supported Housing Visiting Officers for 6 months. The Visiting Officers have now started visiting supported accommodation in the borough, starting with higher risk non-commissioned SEA. This is now allowing us to understand local provision and need, which will drive the strategy's approach, putting resident experience at the heart of the strategy.

5.5.5. **Stakeholder engagement**: to develop the strategy, officers have either already engaged with or are planning to engage with several other stakeholders, including:

- Internal stakeholders
  - Adult Social Care
  - Children's Social Care
  - Public health
  - Planning
  - Brent Safeguarding Adults Board and other safeguarding leads
- Externals:
  - Providers of all types of supported housing, including VCS
  - ICB and NHS mental health teams
  - Prisons and Probation
  - Crisis, including Single Homelessness Prevention Service
  - Bridges Outcomes Partnership
  - VCS organisations e.g. B3 and Voices for Homelessness
  - Drug & alcohol service (Via)

5.6. Key considerations for the strategy

5.6.1. This section gives an overview of officers' current shortlist of considerations for the strategy and delivery plan to address.

5.6.2. **Provider engagement and market managemen**t: Since Covid, the non-commissioned SEA market has emerged in an uncoordinated manner. Consequently, in the view of the SEA programme board, historically the council has lacked relationships with providers, providers largely shaped the market rather than the council (or partners), and there are significant gaps in provision, with too much poor quality generic support for low-needs individuals and insufficient targeted support for specific cohorts, including higher needs cohorts. To address this, as well as subsidy loss pressures, the Council has had to take a more restrictive approach over the past year, which also does not reflect the collaborative approach needed to develop a strong and stable market. Officers hope through this strategy to redevelop a clear role engaging with the market collaboratively, providing clarity on what local needs are, and shaping the market accordingly.

5.6.3. At the same time, there are significant opportunities to improve provider engagement and market management for commissioned supported housing services such as Housing Related Support contracts for mental health, substance misuse, domestic abuse, and so forth.

5.6.4. The supported living market is both large and complex, with over 100 supported living providers that we're aware of. From time to time, provider contracts do not work out and there is opportunity for improvement on a number of legacy contracts. The commissioning team have a plan for engagement for the coming year which would be good to codify in the supported housing strategy, with a goal to consolidate some contracts by working more exclusively with providers that share our values, demonstrate good quality and value for money, and adhere to our pricing schedule.

5.6.5. **Quality of support provision:** Quality of support provision in the wider sector, and in Brent, is generally considered to need improvement. Officers are proposing introducing a system to rate the quality of support, equivalent to the 'Setting the Standard' system used to classify the quality of temporary accommodation.

5.6.6. **Local connection:** A small number of providers are almost exclusively providing supported housing for residents from outside the Borough. This has come at financial cost to the council. In previous years, there has been no legal or regulatory mechanism to turn these residents down, but the new

Act allows the Council to reject applicants or schemes not in line with the Local Supported Housing Strategy. While there are clearly very legitimate reasons to access supported housing outside the borough – domestic abuse, rough sleeping, and the fact that residents may come from just outside Brent's borders – officers feel there ought to be a proportionate approach. Most providers, unless wholly catering to some of the above exceptions, should primarily cater to Brent residents.

5.6.7. **A ladder of support – pathways between provision**. Human lives do not neatly fit into boxes, and accordingly residents may require more or less support at different times. Moreover, maintaining residents in high needs supported accommodation can trap residents in a deleterious cycle of reduced independence. Instead, the council hopes to use this opportunity to align the different types of supported housing to tackle gaps in provision and enable residents to move up and down the 'ladder of support' as needed. This will include: supported living (ASC care package); extra care; Housing Related Support; non-commissioned supported accommodation; and finally independent living. The goal is for residents to move down the ladder and into independent living, while recognising that they may sometimes need to move up again, and creating the agility within the system to rapidly move them up and down as needed.

5.6.8. **Move on:** At present, there is significant variation between providers in their approach to supporting residents to move on into independent living. Overall, move on across the system is weak, both due to a genuine lack of properties and also a lack of work to support residents to take the next step. This strategy should include a clear plan to address this, improve move on, and develop an improved, coordinated, and collaborative approach to achieving move on and flowthrough.

5.6.9. **Gaps in the system:** Certain cohorts are not catered to by the current system. Some of this information will come out of ongoing desk-based data analysis and from the visiting officer inspections. However, officers are already aware of gaps around:

- Modified properties for residents with mobility requirements.
- Male only self-contained schemes for former offenders or residents on the sex register.
- Mother-and-baby units.
- LGBTQ+ provision.
- Family provision.

Staff also anticipate identifying a gap between the low-medium support needs which most supported housing caters to and the threshold for Adult

Social Care. This “high needs” cohort is not catered to and often get stuck in temporary accommodation, either because HNS cannot refer them into supported housing, or because they get evicted and return to TA.

5.6.10. **System improvements**

- Evictions & rent arrears – evictions from supported housing have increased substantially recently. Anecdotally, this is related to rent or service charge arrears due to poor clarity around responsibilities and inconsistent service charge responsibilities.
- Vulnerable persons coordinator – other areas have a dedicated officer responsibility for coordinating support for some of our most vulnerable residents.
- Unified referrals form – different supported accommodation providers have different referral forms, creating duplication and often acting as a barrier to referrals. Instead, Brent should develop and adopt one referral form for all.
- Joint assessments – residents are frustrated at needing to repeat themselves multiple times. Where the referrer, is a trusted provider, we should explore joint assessments of residents between referrer and provider.
- Provider forum – there is no dedicated space for providers to hear from the council, meet one another, and work collaboratively to drive up sector standards in Brent. This strategy should outline the goal to create this space, and resource it accordingly.

5.6.11. **Resident feedback** – the strategy should identify ways to better identify resident feedback and lived experience and ensure that this feedback informs the council’s strategy. In time, this should lead to embedding co-production into the process of planning and designing support services.

5.6.12. **Value for money and financial sustainability** – overall, supported housing does not appear to deliver strong value for money and is not financially sustainable to the council. This strategy should set out a strong plan to address both.

5.6.13. **Data and Digital** – having a good digital system makes referrals into the supported accommodation system simpler and easier, and allows better data and monitoring of moves into, between, and out of supported housing. To that end, the Housing Needs and Support Department are currently planning to procure a digital system to do just that, especially for Housing Related Support, Supported Living (including NAIL), extra care, and non-commissioned SEA, which currently operate off various spreadsheets and

email chains. This will also enable the Council to become compliant with new MHCLG data reporting requirements.

5.6.14. **Resource requirements**: Long-term, the Council must not only publish a strategy but also a delivery plan. In order to meet that delivery plan, dedicated resource will need to drive forward the work within it. That plan remains in development and is likely to include the need for resource to:

- Engage with providers – both commissioned and non-commissioned – and manage those relationships, proactively shape the market, and enable the principles of community capacity and capability building.
- Store and steward data about households in supported accommodation of various forms.
- Strategically plan and drive forward a capital programme pipeline for supported accommodation of various kinds.

6. Supported Exempt Accommodation

6.1. Introduction

6.1.1. Supported exempt accommodation is so called because it is exempt from locally set caps on housing benefit. Legally, SEA is:

Accommodation which is provided by a non-metropolitan county council in England, a Housing Association, a registered charity or voluntary organisation where that body or a person acting on its behalf also provides the claimant with care, support or supervision.[2]

6.1.2. Supported exempt accommodation (SEA) has been the subject of various reports, including a Select Committee report and more recently a BBC Panorama programme. Poor provision of SEA has been linked to neglect, abuse, profiteering and, in some cases, organised crime.

6.2. Mapping

6.2.1. At the start of the financial year, there were 1123 units of supported exempt accommodation in Brent, supporting residents with a variety of needs, especially those at risk of or with experience of homelessness, including rough sleeping, as well as domestic abuse, mental health and substance misuse. There are also some specialist units for care experienced young people and residents with physical disabilities and learning disabilities.

[2] The Housing Benefit and Council Tax Benefit (Consequential Provisions) Regulations 2006, Schedule 3

6.2.2. 352 individuals are claiming housing benefit for supported exempt accommodation operated by providers that are not registered with the Regulator of Social Housing. 771 are with Registered Providers.

6.3. Quality assurance and safeguarding

6.3.1. Staff are aware of challenges at the national level around the quality of non-commissioned supported exempt accommodation. For that reason, staff engaged directly with 6 of the council's largest non-commissioned providers in summer 2025 to understand their approach, considering their operational arrangements, safeguarding arrangements, and their approach to rent levels, evictions, and move ons. This informed the council's approach to market shaping. Since then, staff have worked to expand provision for the best quality providers and to secure its use for Brent households most in need. Meanwhile, staff have worked with lower quality providers to monitor improvements and, for the lowest quality providers, to slowly phase out their provision.

6.3.2. In addition, housing benefits staff closely monitor every single SEA housing benefit application, asking for evidence of a needs assessment and support plan, and ongoing support logs. Applications are regularly turned down or cancelled due to inability to evidence the above.

6.3.3. Staff are aware that one provider, where staff had some concerns, have now stopped operating in Brent and have safely transferred their stock and residents to alternative arrangements. The Council is working closely to support and enable this process.

6.3.4. Staff conducted a thorough site visit to two properties operated by one provider, including speaking to staff and to residents. In that case, staff were impressed by the overall quality of the properties, support, management, and impact on residents' lives.

6.3.5. Since then, the Council has brought in temporary visiting officers to conduct more visits and introduce more assurance regarding the quality of SEA in Brent. This will allow the Council to ascertain whether residents are adequately receiving support, identify high-priority issues, escalate safeguarding concerns where necessary, and identify residents ready for move on. The officers will be considering the following high level quality framework:

- Good quality accommodation
- Personalised care and support
- Safeguarding

- Resident involvement
- Genuine support need
- Clear pathways to independence
- Referrals and evictions
- Fire safety
- Health and safety
- Housing Benefit compliance
- Financial sustainability
- Fair and reasonable costs
- Affordability and value for money

6.3.6. Staff hope to identify opportunities to maintain the visiting regime, including using funding from the Government's forthcoming licensing scheme.

6.4. Safeguarding and escalation

6.4.1. Staff in Housing Needs and Housing Benefit are working closely with the Brent Safeguarding Adults Board (BSAB) to introduce a new reporting process for providers of supported housing for major incidents. This has been communicated to all providers of supported housing in Brent.

6.4.2. The safeguarding process is as follows: first, the provider must notify the Brent Safeguarding Adults Forum promptly and document the incident. Providers must have an assigned person for this purpose. Second, the provider must gather all relevant details to complete a Council form for record-keeping. Third, the provider must conduct an internal review, address key questions, and identify lessons learned. Fourth, they must submit to Brent council. And fifth, they must commit to continuous improvement. BSAB will meet to discuss any incidents and lessons learned.

6.5. Resident Experience

6.5.1. In Autumn 2025, staff visited two properties in the borough currently providing non-commissioned supported exempt accommodation, mostly to residents fleeing domestic abuse/fear of violence and refugees with mental health needs. In addition, staff invited various residents currently residing in SEA to come into Brent Civic Centre to talk to their experience.

6.5.2. Overall, staff heard detailed and open testimony from three residents. 2 of 3 stated that they received no support at all in their current supported accommodation. Those residents had been residing in SEA for 5 years and 10 years respectively with two large providers. 1 stated that provision of a weekly support worker for a year, alongside a limited number of therapy sessions, 'changed my life'. That resident was able to move into independent

living alongside a career lecturing at a London university within one year. 1 resident was living in fear of violence and would benefit from being housed elsewhere, away from (alleged) use of drugs and alcohol and potentially in a women's only scheme.

6.5.3. Residents highlighted the kind of support they would benefit from:
- Structured weekly 1:1 sessions with a support worker
- Tailored benefits support
- Tailored employment support
- Support to find move-on / independent accommodation
- Group activities and opportunities to meet others and connect with community
- Psychological therapy

6.5.4. Many of these findings complement findings from engagement with residents receiving Housing Related Support Services, as outlined below.

6.6. **Financial Analysis**

6.6.1. The National Audit Office explains: "Local authorities pay Housing Benefit for specified supported housing, in most cases, directly to the provider. DWP reimburses local authorities for these payments in line with the Housing Benefit subsidy rules which are set out in legislation. In some cases, the rules mean that the amount of subsidy paid to the local authority may be restricted. If the housing provider is registered with the Regulator of Social Housing, DWP reimburses the full amount." For those cases where the housing provider is not registered, an independent rent officer determines how much the local authority can claim as rent, based on similar properties in the area. The local authority can reclaim 100% of the rent officer determination from DWP. Who pays for the amount above the rent officer determination depends on the vulnerability of the resident. The NAO explains: "If the resident is classed as 'vulnerable', the local authority can claim a further 60% of the amount above the rent officer determination. Therefore, local authorities experience a gap in subsidy from DWP of 40% above rent officer determination for particular vulnerable groups, and 100% above this determination, for other residents."

6.6.2. If the provider is a Registered Provider, the entire cost falls to the DWP. If the provider is not a Registered Provider, the cost is shared between the council and the DWP, with the DWP covering more if the resident has a vulnerability.

6.6.3. Subsidy loss related to SEA was highlighted as a significant problem in 24/25, during which year loss was £3.96m. Estimates suggested cost could increase as high as £5m in 2025/26 and nearly £6m in 2026/27. However, following

significant action from staff, in 2025/26 subsidy loss equalled £2.06m. This was achieved through a combination of interventions:

- An improved process for assessing cases, ensuring that the resident has genuine support needs and the provider is capable of meeting them. This has reduced the number of new entries.
- Identifying 'vulnerable residents' e.g. those in receipt of Personal Independence Payment (PIP), and therefore claiming a further 60% of costs from DWP (see above).
- Improved scrutiny of new providers. Bearing in mind national trends and concerns, officers have conducted significantly greater scrutiny of new providers approaching the council, especially Community Interest Companies (CICs), which are associated with concerns at the national level. By preventing unscrupulous providers entering the market, we have avoided the additional demand they can bring, including residents from outside of Brent.

6.6.4. The latest forecast suggests this will drop below £1.3m in 2026/27, significantly outperforming the cross-Departmental commitment to savings of £130,000 on top of a budget reduction to £1.81m.

6.6.5. Staff continue to work to embed this improvement sustainably and to go further. They will do this by:

- Working with providers to enable a partnership model, whereby support providers work in partnership with Registered Providers.
- Work in partnership with First Wave Housing to introduce a new supported exempt accommodation scheme which delivers cost reductions, improved quality and better value for money.

6.6.6. Overall, staff believe more can be done to improve value for money. That is why the council is working in partnership with First Wave Housing to launch a supported accommodation scheme. It is also why we will continue to work with providers to drive up quality, support good providers to expand, manage out poor providers where necessary, prepare for the new Supported Housing Regulatory Oversight Act and associated licensing scheme, and develop a new Local Supported Housing Strategy.

6.7. **Benchmarking**

6.7.1. It is challenging to benchmark for supported exempt accommodation. This is because local authorities do not have a statutory role to commission or deliver SEA, only to decide whether a provider may access a particular category of housing benefit. Consequently, this is not something that local authorities are required to report on nor that is published by MHCLG, Local Government

Inform, or other platforms. At the same time, most authorities do not wish to share the level of provision, and associated cost, in their borough.

6.7.2. Brent Council meets regularly with other local authorities to discuss approaches to supported exempt accommodation. This includes methods to reduce subsidy loss, the provider market and partnership arrangements. This includes engaging with sub-regional, regional and national groups working across Housing Benefits, Project Delivery, and Housing Needs and Support. The council has continuously implemented best practice and ideas generated from this engagement, and now often advises and supports other authorities. The Council even recently hosted a West London session on developing a Supported Housing Strategy.

7. Housing Related Support

7.1. Brent commissions accommodation and support for adults experiencing homelessness and ex-offenders, domestic abuse refuges, mental health support, and young people (18-24). They play a critical role in preventing homelessness, supporting vulnerable residents to live independently, and in reducing reliance on statutory interventions in health, housing and social care.

7.2. There are 379 units of housing related support services at present, in addition to a floating support service and a handyman and support service. The total value of these contracts is ~£3.25m.

7.3. Adult Social Care and Housing Needs and Support jointly commissioned a review of Housing Related Support Services by Bridges Outcomes Partnerships to evaluate the performance, relevance, and future direction of existing housing-related support services. The review found that while current services deliver substantial support to key population groups, including people experiencing homelessness, women fleeing domestic abuse, young people, and older adults, there are also several systemic challenges which undermine their effectiveness. These include a limited quantity of move-on accommodation, rigid eligibility criteria, a lack of integrated pathways, and minimal collaboration across sectors.

7.4. **Resident experience in Housing Related Support services:**

7.4.1. This section outlines findings from Bridges Outcomes Partnerships' review into housing related support services, who conducted in-depth, semi-structured interviews with service users to understand lived experience.

7.4.2. Many individuals value the support and dedication of frontline workers. However, people also report feelings of isolation, slow progress in their lives,

and limited support in preparing for life beyond the service. A lack of coordinated exit planning often leaves people unsure about what comes next. Key concerns include clarity about what to expect, how long they might stay, intended outcomes, and how they will be supported to progress. From the point of entry, clients are not always given clear information about what to expect from a service, including how long they might stay, what the intended outcomes are, or how the service will support them to progress toward stable housing and greater independence. While they received ad hoc support, this was not brought together to form a coherent pathway to independence. Further, this support could feel fragmented and lacked follow-up e.g. receiving CV-writing workshops but no further support for job applications, interview preparation, or sustaining employment. Other concerns were around slow timescales for void turnarounds and high levels of arrears, preventing move on. Move on accommodation continues to present a challenge in the current housing context, especially for mental health provision.

7.4.3. Overall, some people remain in services longer than necessary not because of needs but due to lack of options or practical move-on support. Nonetheless, many individuals described positive working relationships with support workers, citing kindness, reliability, and emotional support.

7.4.4. Brent Council is currently going out to tender for a design partner to support the Council to commission new outcomes-based contracts for these services.

8. The Wider Supported Housing System

8.1. **Supported Housing Board:** The Council has stood up a new Supported Housing Board to take a holistic, cross-council approach to supported housing, with a broad scope across all kinds of supported accommodation. This holistic approach will allow the Council to:

- Join up housing, adult social care, and children's provision of high, medium and low need supported accommodation
- Create a coherent overall supported housing ecosystem, minimising duplication and filling in gaps
- Better engage with providers across all forms of supported accommodation in a collaborative manner, and better coordinate market management
- Tackle shared system challenges e.g. voids, evictions, rent arrears, referral processes
- Better engage with residents and consider resident experience, improving residents' lives and helping residents to achieve independence where possible, with a particular focus on vulnerable groups such as residents with disabilities and residents who have experienced domestic abuse

- Achieve better value for money
- Implement the new supported housing licensing scheme, as mandated by MHCLG
- Develop and deliver the Local Supported Housing Strategy, as mandated by MHCLG

8.2. **Homelessness pressure valve:** The homelessness crisis has left more people in need of support before they are able to re-enter independent living. There are also more cases, and more complex cases, approaching Housing Needs who require support. For both, the supported housing system offers both a pressure valve and an opportunity for recovery and independence, and it will be important that the new strategy reflects the extent to which an increasing proportion of supported housing need is driven by the homelessness crisis – and the role it can play as a solution.

8.3. **Licensing scheme:** In Spring 2025, the Government consulted on the principles of introducing a new licensing scheme for supported accommodation, which the Council provided a thorough response to. Providers will only be able to claim the higher level of housing benefit that supported exempt accommodation offers if the scheme is licensed. The scheme will apply to most supported accommodation schemes and potential providers will need to meet the new National Supported Housing Standards and conditions related to the standard of accommodation, the suitability of the accommodation and support for the resident, and the provision of care, support and supervision. All licensees and scheme operators will also be required to pass a fit and proper person test.

8.4. This will provide the council significantly greater powers to regulate the provision of supported accommodation, which staff welcome. Council staff have prepared extensively for the introduction of the new licensing scheme, bringing together a multi-disciplinary group to learn about the existing market and identify the approach to standing up a new team.

8.5. The Government recently responded to its Consultation and is now consulting on draft DWP/MHCLG regulations. Officers are currently drafting a response to this Consultation.

8.6. **New approaches to supported housing**

8.6.1. The Council has been proactively exploring and identifying new approaches to supported housing that place resident experience, operational assurance and financial sustainability front and centre.

8.6.2. **First Wave Plus**: The Council has approved a scheme to work in partnership with First Wave Housing, who will launch a new supported accommodation scheme, 'First Wave Plus'. Its goal is to develop a model of supported housing that puts quality and value at the centre, while also being financially sound and sustainable. This scheme hopes to offer supported accommodation to over 300 residents within 2 years, including at least 150 new units. Officers are taking key legal documents to First Wave Housing's Board at the end of the month for a final decision and start the first phase of the new scheme. To this end, the Council has identified a set of properties owned by a Landlord that either the Council or First Wave Housing could enter into a long term partnership with to create best-in-class supported and/or temporary accommodation.

8.7. **Converting temporary accommodation to supported accommodation**:

8.7.1. Currently, Brent Council has a block booking arrangement with the Stayclub in Harlesden for 139 fully self-contained one-bedroom units of temporary accommodation. The block booking arrangement ends 31 January 2027 and officers are currently negotiating the future arrangements for this block.

8.7.2. In addition, all single residents owed a main housing duty (which comprises most residents in temporary accommodation) – many of whom are living in the Stayclub – are vulnerable. Many require support. At present, existing temporary accommodation arrangements are unable to provide that support, and officers supporting single households owed the main housing duty have roughly 300 cases each. Relatedly, there have been a small number of complaints regarding resident behaviour related to the 139 households (mostly single) living in the Stayclub. By introducing support at ~1:18 ratio, residents will be better supported and the Council hopes to improve resident behaviour, better support residents, and prevent complaints. Support is likely to include:

- a minimum of 2.5 hours per week support per residents
- structured weekly 1:1s
- support with accessing benefits and health appointments
- tenancy sustainment
- employment support
- supporting residents to attend community events,

8.7.3. In addition, by claiming a different form of housing benefit which is exempt from the Local Housing Allowance cap, this proposal would in fact allow the Council to make substantial cost reductions against the temporary accommodation budget, which is under exceptional pressure.

9. Supported Accommodation: New and Independent Living Scheme (NAIL)

9.1.1. The Supported Accommodation portfolio plays a key role in supporting vulnerable adults to live independently within the community whilst receiving the support required to maintain their accommodation and improve their wellbeing.

9.1.2. The New and Independent Living (NAIL) programme was established in 2014 to develop alternatives to residential care for vulnerable adult client groups across the borough. The programme supports Brent's wider objectives of promoting independence, improving resident outcomes and reducing reliance on higher-cost residential placements.

9.1.3. The housing management service works in partnership with Adult Social Care under a Service Level Agreement to deliver tenancy and property management functions across supported accommodation schemes. This partnership enables Housing Management, Adult Social Care, Commissioning, Brokerage and support providers to work together to deliver effective housing solutions for some of Brent's most vulnerable residents.

9.2. Breakdown of the Scheme

9.2.1. The portfolio is currently made up of 268 units across 27 schemes supporting a range of client's groups:

- Learning Disabilities
- Mental Health
- Extra Care
- Housing Related Support
- Other vulnerable adult cohorts

9.2.2. The accommodation ranges from self-contained flats through to larger communal schemes and purpose-built developments designed to support specific needs and client groups.

9.2.3. In recent years, the portfolio has expanded significantly through the development and mobilisation of new specialist accommodation schemes, including Extra Care provision at Emma Haas House and Honeypot Lane, alongside Supported Living schemes such as Clock Cottage. These developments have increased the borough's capacity to provide housing options for residents with a range of support and care needs whilst reducing reliance on more expensive residential care placements.

9.3. How is the Management Different than General Needs?

9.3.1. The tenancy management of the NAIL portfolio sits within the Specialist Accommodation Team, with Temporary and Supported Accommodation Officers responsible for managing both NAIL properties and Brent-owned Temporary Accommodation. Supported accommodation requires a significantly enhanced housing management approach compared with general needs housing due to the complexity and vulnerability of the resident groups being supported. Officers operate with smaller patch sizes than general needs Area Tenancy Managers, enabling them to provide a more intensive tenancy management service, undertake more frequent tenancy audit visits and communal area inspections, and spend more time working directly with residents to sustain tenancies and address issues at an early stage.

9.3.2. The team works closely with support providers, Adult Social Care, Commissioning and Brokerage teams through regular partnership working arrangements to coordinate support, manage risk and respond effectively to changing resident needs. Officers are also regularly present within larger schemes, helping to build strong working relationships with residents and on-site support providers. There is also an increased focus on safeguarding, vulnerability management and tenancy sustainment, supported by access to specialist systems and information where appropriate.

9.3.3. Whilst residents access the same repairs service as general needs tenants, the team plays an important role in ensuring repairs impacting vulnerable residents are appropriately escalated and prioritised where necessary. In addition, many residents within the NAIL portfolio are provided with furniture, flooring and white goods, with the service responsible for arranging ongoing repairs and maintenance of these items.

9.4. **Partnership Working**

9.4.1. One of the key strengths of the supported accommodation service is the close partnership working between Housing Management, Adult Social Care, Commissioning Teams, Brokerage Teams and Care and Support Providers. This collaborative approach enables the effective management of complex cases, improves safeguarding outcomes, supports tenancy sustainment, facilitates the coordinated mobilisation of new schemes, strengthens referral and allocation processes, develops effective move-on pathways and supports the management of voids and occupancy across the portfolio.

9.4.2. The service is currently working with Housing Needs, Adult Social Care and Commissioning colleagues to develop a Supported Housing Panel which will

provide a more coordinated approach to managing referrals and placements across the specialist accommodation pathway. The panel will help ensure referrals are appropriately screened and matched to accommodation, support more consistent decision-making and enable residents to move more effectively between different levels of support as their needs change. This includes supporting residents to step up from Housing Related Support into higher-needs accommodation where required, as well as facilitating move-on into more independent accommodation where appropriate.

9.4.3. Alongside this work, the service is strengthening joint working arrangements with the Housing Needs Department to identify homeless households, especially those in temporary accommodation, with care and support needs who may be suitable for Extra Care or other forms of supported accommodation. This will help ensure specialist accommodation is allocated to those most in need, improve utilisation of the supported housing portfolio, reduce void levels within newly mobilised schemes and ensure that applicants requiring both housing and care support are identified and matched to suitable accommodation at the earliest opportunity.

9.5. **Nail Performance Update**

9.5.1. The service has experienced significant growth during 2026/27, including the mobilisation of new schemes such as Emma Haas House. The expansion has increased the number of voids within the portfolio, especially for extra care schemes however performance data demonstrates positive trends across the KPIs with improvements in occupancy levels, income management, repairs and compliance.

9.5.2. **Voids and Lettings**

9.5.3. The mobilisation of new specialist accommodation schemes has had a significant impact on void performance during 2026/27. Void numbers peaked at 107 units in May and June before reducing to 70 units by October, representing a 35% improvement as new schemes have become established and occupancy levels have increased.

9.5.4. It is important to view void performance in the context of the service's recent growth. A significant proportion of reported voids relate to the mobilisation of new specialist accommodation schemes rather than traditional void management issues. Of the current voids, 19 relate to Emma Haas House, 16 relate to Wembley Park Drive, which is currently being mobilised, 2 relate to Clock Cottage, and 4 relate to Braemar Avenue, which is due to be mobilised in the new year. These schemes have significantly increased Brent's specialist accommodation offer but require referrals, assessments,

care package arrangements and support plans to be in place before occupation can occur.

9.5.5. Void figures are also impacted by a number of residents who have moved into accommodation but cannot yet formally hold a tenancy due to legal arrangements being required for individuals who lack capacity. Although these properties are currently reported as voids, they are occupied and housing management services are being actively delivered. The service is working closely with Adult Social Care and the Learning Disabilities Team to regularise these arrangements and ensure records accurately reflect occupation status.

9.5.6. Consequently, headline void figures overstate the number of genuinely vacant specialist accommodation units and should be considered alongside the mobilisation of new schemes and ongoing tenancy formalisation work.

9.5.7. **Void Rent Loss**

9.5.8. Void rent loss remains the service's most significant financial challenge and reflects the mobilisation of new accommodation, delays in specialist referrals and the time required to establish appropriate support arrangements for residents. Despite this, performance has improved considerably during the year, with void rent loss reducing to 58.5% by October 2026 as occupancy levels across newer schemes have increased. Further improvements are expected as Emma Haas House, Wembley Park Drive, Braemar Avenue and other recently mobilised schemes progress towards full occupancy.

9.5.9. **Income Collection**

9.5.10. Income collection performance has remained strong throughout the reporting period despite the challenges associated with mobilising new schemes, establishing Housing Benefit and Universal Credit claims for new residents and increasing occupancy across the specialist accommodation portfolio. Year-to-date rent collection stood at 100.5% by October 2026, demonstrating that the service is successfully maintaining rental income whilst supporting residents with often complex needs. This reflects close working between Housing Management, support providers and Adult Social Care colleagues to maximise income, resolve benefit issues at an early stage and sustain tenancies.

9.5.11. Performance has also been supported by improvements in arrears management, with current arrears reducing from 28.7% at the end of 2025/26 to 10.0% by October 2026. This reflects proactive tenancy management, early intervention and effective partnership working to support

residents in maintaining their tenancies and maximising entitlement to welfare benefits.

9.6. **Conclusion**

9.6.1. Supported accommodation continues to play a vital role in enabling vulnerable residents to live independently whilst reducing reliance on more costly residential care provision.

9.6.2. The service has successfully managed a period of significant growth and change, including the mobilisation of major new specialist accommodation schemes and the expansion of supported housing provision across the borough. Alongside this, there has been a significant increase in joint working across the supported accommodation portfolio, with Housing Management, Adult Social Care, Housing Needs and Commissioning teams working more closely together to ensure accommodation is being utilised effectively and matches identified need.

9.6.3. This has included the introduction of more structured operational meetings across services, supporting improved oversight of referrals, allocations, voids and pathway management. The service is also working with Housing Needs, Adult Social Care and Commissioning colleagues to develop a more coordinated approach to placements across the supported accommodation pathway, helping residents move between different levels of support as their needs change whilst ensuring specialist accommodation is allocated appropriately.

9.6.4. Partnership working has also enabled a review of existing accommodation and how it is being utilised. Following discussions with Adult Social Care, a scheme that was no longer suitable for use within the NAIL portfolio has been repurposed as temporary accommodation for survivors of domestic abuse, ensuring the asset continues to meet an identified area of need. In addition, the service is working with Housing Needs to identify homeless applicants whose care and support needs may make them suitable for Extra Care accommodation, helping to fill voids within newly mobilised schemes whilst ensuring applicants are matched to the most appropriate housing option.

9.6.5. Whilst void performance remains an area of focus, a significant proportion of reported voids relate to newly mobilised specialist accommodation and units awaiting tenancy formalisation. As schemes become established, referrals increase and outstanding legal arrangements are resolved, occupancy levels are expected to continue improving.

9.6.6. Overall, performance demonstrates positive progress, with void numbers reducing significantly during the year, rent collection remaining strong at 100.5%, current arrears reducing substantially and compliance performance maintained at 100%. The strengthened partnership approach across Housing Management, Housing Needs, Adult Social Care and Commissioning provides a strong foundation for the continued growth and development of Brent's supported accommodation offer, ensuring residents can access the right accommodation and support at the right time.

10. Stakeholder and ward member consultation and engagement

10.1. Officers have engaged with a number of stakeholders including internal Departments, external statutory partners, community organisations, and residents, as outlined in Section 5.5.

10.2. Officers have engaged with the relevant Cabinet member. They plan to engage with Housing Scrutiny on 24 November 2026 before engaging with Cabinet in early 2027.

11. Financial Considerations

11.1. In 2025/26, Brent received £88k of New Burdens Funding from MHCLG to support development of a Supported Housing Strategy, Needs Assessment and Delivery Plan. Further funding is expected for 2027/28 and 2028/29 to support the next phases.

11.2. Once the licensing scheme is live, the fee structure will be set to ensure that the income generated is sufficient to fund enforcement activity, property inspections, and proactive action against unlicensed or non-compliant landlords throughout the licence period. As the Council is not permitted to generate a surplus from selective licensing schemes, all income generated will be ring-fenced for purposes directly related to the operation and enforcement of the scheme.

11.3. Any additional funding required by Brent will be dependent on the finalisation of the strategy, delivery plan and confirmation of the Government’s published licensing regulations. At present, the Government has proposed that the Council can set fees equal to the cost of administering the licensing scheme.

11.4. Approximately one-third of supported housing properties are already subject to existing licensing frameworks. This provides the Council with an opportunity to undertake a detailed assessment of property conditions, which will directly inform the development and refinement of the wider strategy.

12. Legal Considerations

12.1. The Supported Housing (Regulatory Oversight) Act 2023 ("the Act")[3] places a mandatory duty on councils to prepare, publish and maintain a Local Supported Housing Strategy by 31 March 2027, informed by an assessment of current provision, unmet need and projected future demand over a five-year period.

12.2. The strategy must be developed in collaboration with social services authorities and relevant partners, embedding supported housing planning within wider housing, health and care frameworks. Failure to demonstrate effective partnership working or to align the strategy with broader statutory functions (including homelessness prevention, adult social care and safeguarding) may expose councils to legal challenge or criticism through inspection, audit or judicial review.

12.3. The Act strengthens councils' role in market oversight by linking strategic planning with forthcoming licensing and National Supported Housing Standards. Via the forthcoming licence scheme Councils will be responsible for issuing licences based on a provider's ability to meet new National Supported Housing Standards. This requirement introduces both the mechanisms and relevant powers for Councils to regulate both commissioned and non-commissioned providers, ensuring that all housing meets consistent standards. Although licensing regulations are expected to be commenced later, councils are legally required to use the strategy to inform future commissioning, enforcement priorities and engagement with both commissioned and non-commissioned providers. This creates an enhanced duty to ensure decisions are evidence-based, proportionate and consistent.

12.4. Strategies must be kept under review and updated at least every five years, with annual monitoring to MHCLG informing ministerial oversight.

13. Equity, Diversity & Inclusion (EDI) Considerations

13.1. 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.

13.2. 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

[3] Supported Housing (Regulatory Oversight) Act 2023

disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic.

13.3. Supported exempt accommodation is used to house residents with a wide array of needs, including:

- housing with care for older people
- people with a learning disability and/or autistic people
- people with mental ill health and/or physical disability
- young people leaving care or who are at risk of homelessness
- people experiencing or at risk of homelessness
- people with drug and alcohol dependency needs
- people with multiple complex needs
- domestic abuse refuges and safe accommodation with support

13.4. Supported housing is more likely to be accessed by residents who are from black, Asian, mixed or other ethnic backgrounds, who are disabled, and who are asylum-seekers.

13.5. Many of the residents living in supported housing are protected under the 9 protected characteristics laid out in the Equality Act, and these groups are more likely to experience health inequalities, social exclusion, and complex support needs.

14. Climate Change and Environmental Considerations

14.1. The actions and proposals herein do not impact on the Council's environmental objectives and climate emergency strategy.

15. Communication Considerations

15.1. Brent Council has published information about Specified Accommodation on its website, alongside the council's approach to assessing SEA claims. This information is available to all organisations or individuals providing or wishing to provide SEA in Brent.

15.2. In line with the Supported Housing (Regulatory Oversight) Act, once Brent Council receives clear implementation timelines from DWP and MHCLG for the new supported housing licensing scheme, it will develop an implementation plan and clearly communicate plans for a new licensing scheme clearly and in good time to any landlords or providers that may be impacted by the new licensing scheme.

Report sign off:

Tom Cattermole
Corporate Director of Residents and Housing Services