



Cabinet
9 November 2026

**Report from the Corporate Director
of Resident and Housing Services**

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

Housing Management Policies

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
List of Appendices:	<p>Thirteen</p> <p>ASB Policy Appendix 1 Draft Anti-Social Behaviour Policy Appendix 2: Anti-Social Behaviour Policy Equality Impact Assessment</p> <p>Compliance Policies Appendix 3: Draft Asbestos Policy Appendix 4: Draft Fire Policy Appendix 5: Draft Gas Safety Policy Appendix 6: Draft Water Safety Policy Appendix 7: Draft Mechanical Electrical Services Policy Appendix 8: Building Safety Guide for Residents Appendix 9: Compliance Policies Equality Impact Assessment</p> <p>Vulnerabilities and Reasonable Adjustments Policy Appendix 10: Draft Vulnerabilities and Reasonable Adjustments Policy Appendix 11: Vulnerabilities and Reasonable Adjustments Policy Equality Impact Assessment</p> <p>Compensation Policy Appendix 12: Draft Housing Compensation Policy Appendix 13: Housing Compensation Policy Equality Impact Assessment</p>
Background Papers:	N/A
Contact Officer(s):	Spencer Randolph, Director of Housing Services

(Name, Title, Contact Details)	020 8937 2546 Spencer.Randolph@brent.gov.uk
--------------------------------	---

1.0 Executive Summary

- 1.1. This report seeks Cabinet approval for a set of Housing Management Policies. The policies covered by this report are the Anti-Social Behaviour Policy, Compliance (Asbestos, Fire, Gas, Mechanical Electrical Services and Water) Policies, Vulnerabilities and Reasonable Adjustments Policy and Housing Compensation and Remedies Policy.
- 1.2 The development and review of these policies forms part of the Council's wider Housing Management Improvement Plan, which includes strengthening the policy framework that underpins housing management services and providing clearer expectations for staff and residents.
- 1.3 The policy programme supports the Council's ongoing work to ensure that its housing services comply with the requirements of the Regulator of Social Housing's Consumer Standards, including the requirements relating to "Safety and Quality", "Transparency, Influence and Accountability", and "Neighbourhood and Community".
- 1.4 This report provides an overview of the policies, their purpose and key changes made through consultation, and how they contribute to the Council's wider housing management improvement and regulatory compliance programme.
- 1.5 To support timely approval and implementation, and following legal advice, the policies have been brought together within a single report. This reflects the importance of having the policies in place as part of the Council's regulatory improvement work.

2.0 Recommendation(s)

- 2.1 Cabinet is asked to approve the following Housing Management Policies:
 - (a) Anti-Social Behaviour Policy.
 - (b) Compliance Policies (Asbestos, Fire, Gas Safety, Water Safety, Mechanical Electrical Services).
 - (c) Vulnerabilities and Reasonable Adjustments Policy; and
 - (d) Housing Compensation and Remedies Policy.
- 2.2 Cabinet are asked to comment on the status and next steps to deliver the policies' commitments.

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 The policies support the priorities set out in the Brent Borough Plan 2023–27, particularly the commitments to Prosperity and Stability in Brent and Thriving Communities.
- 3.1.2 The policies contribute to the Borough Plan's commitment to provide safe, secure and decent housing by strengthening the Council's approach to building safety, housing management and the quality of services provided to residents.
- 3.1.3 They also support the ambition for thriving and safer communities by strengthening the Council's approach to tackling anti-social behaviour, supporting vulnerable residents and ensuring residents have clear and consistent routes to remedies when things go wrong.
- 3.1.4 The policies also support the Council's wider commitment to accessible services and ensuring that residents have opportunities to influence the development and review of housing management services.

3.2 Background

- 3.2.1 The Council is committed to providing safe, secure and well-managed homes and delivering high-quality housing services for residents
- 3.2.2 The Council is undertaking a wider programme of housing management improvement to strengthen our compliance with the Regulator of Social Housing's Consumer Standards and improve the quality, consistency and accountability of housing services.
- 3.2.3 A key element of this work is the development and review of the Council's housing management policies. This includes ensuring that policies are current, clearly set out the Council's approach and responsibilities, and provide an appropriate framework for staff and residents.
- 3.2.4 The policy programme is particularly important in the context of the Regulator of Social Housing's Consumer Standards. The standards set expectations for registered providers in relation to the quality and safety of homes, transparency and accountability, neighbourhood and community management, and the provision of fair and accessible services.
- 3.2.5 The Council has therefore been reviewing its housing management policies to identify gaps, strengthen existing arrangements and ensure that policies provide an appropriate framework for staff and residents.
- 3.2.6 The policies covered by this report have been developed or reviewed as part of this programme and are now being presented for approval.

4.0 Policies for Approval

4.1 Anti-Social Behaviour (ASB) Policy

- 4.1.1 As a social landlord, Brent Housing Management has clear responsibilities to prevent and tackle anti-social behaviour (ASB) and to consider the impact of ASB on residents and communities.
- 4.1.2 Under the Regulator of Social Housing's "Neighbourhood and Community Standard", registered providers are required to have effective policies and processes to prevent and tackle ASB. The revised ASB Policy provides a clear framework for how Brent Housing Management will meet this requirement and respond effectively to reports of ASB.
- 4.1.3 The policy sets out the Council's approach to receiving, assessing and managing reports of ASB, including risk-based case management, prevention and early intervention, partnership working and proportionate enforcement.
- 4.1.4 The policy establishes clear expectations for how ASB cases should be managed, including communication with residents, recording and monitoring of cases, and the use of proportionate interventions and enforcement. This provides a consistent standard for residents and staff and enables the Council to be held accountable for how ASB is managed.
- 4.1.5 The policy places an emphasis on prevention, early intervention and achieving sustainable outcomes for residents and their communities.
- 4.1.6 Consultation and Resident Engagement
- 4.1.7 A six-week public consultation was undertaken through the Council's Have Your Say portal between 4 June 2026 and 19 July 2026. Residents were invited to comment on the proposed Anti-Social Behaviour Policy.
- 4.1.8 To supplement this engagement, the draft policy was also presented at a workshop with Brent Youth Parliament, providing detailed feedback from eight young residents with experience of ASB in Brent.
- 4.1.9 Feedback received from 28 residents during the consultation informed several amendments to the policy, including:

Enhanced focus on prevention:

- Added in a greater emphasis on early intervention, risk assessment, resident engagement and support pathways.

Improved communication, accountability and enforcement:

- Clearer expectations around resident updates, information sharing, record keeping and proportionate enforcement.

Strengthened focus on partnership workings:

- Added in a greater emphasis on joint working with internal services, statutory agencies and community organisations.

Enhanced monitoring and reporting of outcomes:

- Stronger focus on performance, case outcomes, trend analysis and management oversight.

4.1.10 Following approval, the policy will be communicated to staff and residents, with appropriate guidance and training provided to support implementation. Performance and outcomes will be monitored through existing housing management governance arrangements.

4.2 Compliance Policies

4.2.1 The Council has developed five compliance policies covering asbestos, fire, gas, water and mechanical and electrical services. Collectively, the policies establish the Council's framework for managing health and safety risks across its housing stock. They set out the responsibilities and assurance arrangements that support the safe management of residents' homes.

4.2.2 The policies also form part of the Council's wider Building Safety Strategy. They support the Council in meeting its statutory and regulatory responsibilities, including those arising from the Building Safety Act 2022 and associated regulations, the requirements of the Building Safety Regulator, and the Regulator of Social Housing's "Safety and Quality Standard".

4.2.3 The policies provide a consistent approach to identifying, assessing and managing compliance risks and set out the arrangements for inspection, maintenance, record keeping, monitoring and escalation where risks or areas of non-compliance are identified. They also clarify responsibilities across the services involved in managing building and property safety.

4.2.4 Each policy covers a specific area of compliance:

- **Fire Safety Policy** – sets out how fire safety risks are identified and managed within the Council's housing stock and how the Council will meet its statutory fire safety responsibilities.
- **Gas Safety Policy** – sets out the arrangements for the safe inspection, servicing, maintenance and management of gas installations.
- **Water Safety Policy** – sets out the approach to managing water safety and quality risks, including the management of Legionella and communal water systems.
- **Asbestos Policy** – sets out how asbestos-containing materials are identified, assessed, recorded and managed to minimise risks to residents, staff and contractors.

- **Mechanical and Electrical Services Policy** – sets out the arrangements for the safe inspection, maintenance and management of mechanical and electrical systems within the housing stock.

4.2.5 Consultation and Resident Engagement

- 4.2.6 A public consultation was undertaken through the Council's Have Your Say portal between 21 April 2026 and 31 May 2026. Residents were invited to comment on the proposed policies.
- 4.2.7 Residents highlighted that the policies contained technical terminology which made some aspects difficult to understand. In response, a *Building Safety Guide for Residents* has been drafted to sit alongside the policies and explain the Council's approach to building safety in accessible, non-technical language.

4.3 **Vulnerabilities and Reasonable Adjustments Policy**

- 4.3.1 This policy sets out the Council's approach to ensuring that residents experiencing vulnerabilities receive fair, equitable and accessible housing services.
- 4.3.2 The Council has a duty under the Equality Act 2010 to "advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it" (see Section 8 on Protected Characteristics). However, as a social landlord, the Council recognises that residents may experience vulnerabilities for reasons beyond those protected under equalities legislation. The policy therefore sets out how vulnerability is identified and how the Council will respond to residents' individual needs.
- 4.3.3 The policy sets out the Council's approach to addressing vulnerabilities across housing services and the reasonable adjustments that will be put in place for residents who require them.
- 4.3.4 It also provides signposting to wider support services where additional support is required, including GPs and other medical professionals, Mental Health Services, Adult Social Care Services, Family Wellbeing Centres and Brent Hubs. These services complement, but do not replace, tailored adjustments within housing services.
- #### 4.3.5 Consultation and Resident Engagement
- 4.3.6 A six-week public consultation was undertaken through the Council's Have Your Say portal between 17 July 2026 and 28 August 2026. Residents were invited to comment on the proposed policy.
- 4.3.7 Feedback was received from 9 residents. Respondents highlighted the importance of ensuring that the policy is implemented effectively and that staff have the knowledge and support needed to respond appropriately to residents experiencing vulnerabilities and requiring reasonable adjustments.

- 4.3.8 Respondents also suggested that the policy could be strengthened by including specific wording on reasonable adjustments from the Equality Act 2010.
- 4.3.9 In response to this feedback, the policy has been amended to include the relevant wording from the Equality Act 2010, with a footnote providing the relevant reference.
- 4.3.10 Following approval, staff support will be provided to help embed vulnerability-aware practice across housing-related policies, procedures and reviews.

4.4 Housing Compensation and Remedies Policy

- 4.4.1 This policy sets out the Council's approach to compensation and other remedies where residents have experienced a service failure, loss or inconvenience. It aims to ensure compensation is fair and consistent, while taking account of individual circumstances and the impact on residents.
- 4.4.2 The policy sets out the different types of compensation and remedies available, and the circumstances in which they may be considered. This includes compensation relating to missed repairs appointments, complaints, resident engagement and home loss or decant.
- 4.4.3 Consultation and Resident Engagement
- 4.4.4 A six-week public consultation was undertaken through the Council's Have Your Say portal between 24 August 2026 and 4 October 2026. Residents were invited to comment on the proposed policy.
- 4.4.5 Feedback was received from four residents. Respondents raised concerns about the clarity of the definition of remedies, particularly the use of the phrase "something has gone wrong", and the need for the policy to more clearly recognise the stress and impact caused by service failures.
- 4.4.6 In response to this feedback, the definition of remedies has been amended to replace the phrase "something has gone wrong" with more specific examples of service failure, including delays, missed appointments, failures to complete repairs and poor complaint handling. The guiding principles have also been strengthened to explicitly recognise the distress and disruption that service failures can have on residents.
- 4.4.7 Following approval, the policy will be communicated to relevant staff and embedded through existing complaints, compensation and service recovery processes. Monitoring and quality assurance arrangements will support the application of the policy.

5.0 Financial Considerations

- 5.1 The proposed policies focus on prevention and early intervention to address issues. This approach will reduce the need for more costly reactive interventions to deal with problems after they have occurred. The monitoring

processes proposed will help teams identify areas where additional resources may be required which will aid budget planning. The financial implications of introducing the policies will be considered in the development of the Council's 2027/28 budget and for future years in the update of the Council's Medium-Term Financial Strategy.

6.0 Legal Considerations

- 6.1 The Social Housing Regulation Act (2023) introduced new consumer standards and increased the powers of the Regulator of Social Housing. The consumer standards which apply to social housing providers require that providers meet all applicable statutory requirements for the health and safety of occupants in their homes.
- 6.2 Under Section 149 of the Equality Act 2010, the Council must demonstrate "due regard" to the need to eliminate discrimination and advance equality of its residents. Each of the policy should also include Equality Impact Assessment (EIA) to evidence that the policy does not unfairly disadvantage residents falling within the protected characteristic groups.
- 6.3 As the Council owes a duty of financial care to its residents, it is imperative that each of the policy must represent a proportionate, lawful use of public funds and assets.
- 6.4 Housing policies often interfere with private lives or require handling sensitive data. It is therefore important to ensure that each policy must confirm compliance with relevant Human Right Acts 1998 particularly Article 8 which is right to respect for private and family life as well as the Data Protection Act 2018 / UK GDPR.
- 6.5 As the proposed policies are intended to comply with statutory requirements and improve the Council's performance against the applicable standards and to reassure the RSH that the Council is taking the necessary steps to meet its statutory obligations. Having these policies and procedures in place will strengthen Council's position and minimises the chance of legal challenges.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 For each of the policies an Equality Impact Assessment (EIA) has been completed to assess the potential impact of the policy on residents with protected characteristics and other potentially disadvantaged groups.
- 7.2 The EIAs have informed the development and review of the policies, with appropriate measures identified where required to mitigate potential negative impacts and promote equitable access to housing services.

8.0 Climate Change and Environmental Considerations

- 8.1 The policies support the Council's wider commitments under the Brent Climate and Ecological Emergency Strategy 2021-2030, particularly the strategy's objectives relating to homes and the built environment.
- 8.2 The policies are not expected to have any significant direct impact on climate change or the environment. However, the Compliance Policies provide a framework for the safe and effective management and maintenance of the Council's housing stock and will be implemented alongside the Council's wider environmental and sustainability requirements.

9.0 Communication Considerations

- 9.1 Following approval, all policies will be published on the Brent Council website and made available to residents in accessible formats.
- 9.2 The policies will be communicated to staff through guidance and training. Supporting operational procedures will also be updated to ensure consistent implementation across Housing Services.
- 9.3 Residents will be provided with clear information about the policies and any changes that affect the services they receive. Communication will take account of residents' accessibility needs and the requirements set out in the Vulnerabilities and Reasonable Adjustments Policy.
- 9.4 Resident feedback and engagement will continue to inform the implementation and future review of the policies, with learning and feedback considered through the Council's existing housing management governance arrangements.

Report sign off:

Thomas Cattermole

Corporate Director Housing & Resident Services

Legal considerations provided by:
Stephen Akpan, Senior Lawyer Civil Litigation &
Homelessness

Finance considerations provided by:
Martin Hone, Head of Finance