



Cabinet
26 January 2015

**Report from the Strategic Director of
Regeneration and Growth**

For Action

Wards Affected: ALL

Brent's Local Welfare Assistance Scheme for 2015/16

1. Summary

1.1 This report sets out:

- 1.1.1 A recommended scheme for Local Welfare Assistance payments in 2015/16, amending the current local scheme;
- 1.1.2 Changes to funding arrangements in Brent for the scheme in 2015/16 and beyond which will require decisions about whether to continue to provide a scheme in future years after government funding has been exhausted;
- 1.1.3 A recommendation to fundamentally review the scheme for 2016/17; and
- 1.1.4 The financial impacts of the recommended Local Welfare Assistance Scheme for Brent and our residents.

2 Recommendations

2.1 The following recommendations are submitted for consideration:-

- 2.1.1 That the current Local Welfare Assistance scheme objectives and structure are retained into 2015/16, but with amendments to scheme criteria designed to ensure that support is targeted at those most in need; (as described in Option 2 which is set out in the table in paragraph 5(1) of this report);

- 2.1.2 That the underspend in Local Welfare Assistance scheme payments in 2013/14 and the forecast underspend in 2014/15 are ring-fenced to provide a Local Welfare Assistance scheme for at least the next 2 years;
- 2.1.3 That the Local Welfare Assistance scheme is fundamentally reviewed during 2015 with a revised scheme to be implemented in April 2016;
- 2.1.4 That members note the content of the Equalities Analysis that is set out in Appendix C.

3. Executive summary

- 3.1 Brent's Local Welfare Assistance (LWA) Scheme was introduced in April 2013 following the abolition of certain aspects of the Social Fund. The Social Fund had previously been administered by the Department for Work and Pensions and each Local Authority was subsequently given funding to devise and administer its own Local Welfare Assistance Scheme. It was a requirement of any scheme that funding should be concentrated on those facing greatest difficulty in managing their income, and to enable a more flexible response to unavoidable needs.
- 3.2 Whilst it was recognised that the Social Fund did have some shortcomings, there was insufficient time to devise a completely new scheme and the principles for Brent's LWA scheme are broadly similar to the Social Fund that preceded it.
- 3.3 The LWA scheme has now been in existence for 20 months and although it has broadly met the requirement as described in 3.1, there are elements that have not worked so well. These shortcomings are addressed in the recommended amendments to the scheme for 2015/16.
- 3.4 The continuation of the scheme must also be considered in the light of the government's announcement earlier this year that central funding for the scheme will not continue after 2014/15. Although this was challenged and the DWP were required to carry out a fresh consultation exercise, it is still probable that any scheme in place from 2015/16 onwards will need to be funded from existing council resources.
- 3.5 Within their consultative document, three out of the four funding options did not offer any money to authorities to provide a Local Welfare Assistance scheme. The sixth option gave authorities an opportunity to put forward 'robust evidence' that further funding is needed but made it clear that the Government has concluded that the wider funding package for Local Government is sufficient for us to continue our local welfare provision, if it is considered a priority.

3.6 Confirmation of the consultation outcome is being sought, however this does not affect the proposed changes to the local scheme outlined in this report, which in any case is presented on the assumption that there will be no further government funding.

Background

4 The current scheme

4.1 Brent's LWA scheme was introduced in April 2013 and comprises two distinct types of assistance; Crisis Payments which are aimed to help people in short term need because of a crisis or emergency and Community Payments which support vulnerable people in the community, often with help to buy items of furniture or white goods without which they would be unable to live independently.

4.2 The full criteria for the current scheme are included as Appendix A, but currently Brent residents who may be entitled to assistance are likely to be in one of the following groups:-

- Disabled persons
- Persons with mental health issues
- Single parents in receipt of benefits
- Unemployed persons in receipt of benefits
- Persons of pensionable age
- Care leavers
- Persons in temporary accommodation
- Ex-offenders

4.3 Government funding was provided for each of the first two years of £855,509 for expenditure, and a separate grant for administration costs of £180,775 for 2013/14 and £165,700 for 2014/15. The full administration grant was spent in the first year but this will not be the case in year two. The first year of the scheme was particularly expensive to administer as there were one off costs associated with set up, training, publicity and IT.

4.4 However, the process has been streamlined in 2014/15 to combine LWA within the Benefits Welfare Team, who also administer Discretionary Housing Payments, and initial set up costs will not be repeated in 2014/15. The administration costs are expected to be well within the reduced grant of £165,700 in 2014/15 and are anticipated to be as follows:-

2 FTE Welfare Officers	£	77,000
Software licence	£	11,300
Payment cards	£	6,900
Ongoing publicity	£	3,000
Total	£	98,200

- 4.5 In 2013/14 the total expenditure for the scheme was £205,923 for both Crisis and Community payments. The expenditure to November this year is £166,194 in payments and the forecast expenditure for the whole of 2014/15 is £250,000.
- 4.6 The government announced earlier this year that continued funding was to be withdrawn so that no further money would be available to authorities from April 2015. The decision to continue with a LWA scheme will be at the discretion of each authority but any scheme from April 2015 will need to be funded from the Council's own budget.
- 4.7 Although the government funding was not ring-fenced, Brent's decision has been to use the grant funding exclusively for the use of providing a LWA scheme so that the underspend in 2013/14 of £649,586 and the projected underspend during 2014/15 of £605,509 could be made available to fund any scheme in 2015/16 and beyond – a forecast total of £1,255,095. It is recommended that this underspend is used in this way and that consideration is given to the provision of any LWA scheme after the money currently held in reserves will have been exhausted.
- 4.8 It should be noted that administration grant funding will also cease in April 2015. It is recommended that funding for ongoing administration will also be met by the underspend.

The current scheme

- 4.9 The current scheme has the following aims:
- To help people in short-term need because of a crisis or emergency;
 - Support vulnerable people in the community
 - Ease exceptional (financial) pressure on families.
- 4.10 To help meet these objectives, the LWA scheme is comprised of two distinct types of assistance; Crisis Payments (CSP) and Community Payments (CMP).
- 4.11 These payments are available to people who do not have alternative means of paying for what they need and are intended to meet one-off needs and not ongoing expenses. These payments are in the way of a grant and do not need to be paid back (one of the features of the previous DWP scheme that crisis payments were made as loans which were deducted against ongoing DWP benefits).
- 4.12 Some of the likely reasons for awarding a Crisis Payment are:-
- Due to unforeseen circumstances, the applicant has no money for living expenses for themselves and their family;
 - The applicant's money has been stolen;

- Rent in advance is needed in order to secure accommodation when leaving care;
- Help to secure short-term board and lodging to prevent homelessness;
- There has been a disaster (such as fire or flood) which has caused damage to property or possessions.

4.13 Likely reasons for awarding a Community Payment are:-

- To help with expenses for improving a home to maintain acceptable living conditions, for example in the event of a fridge or cooker breaking down;
- To enable an applicant to move closer to someone for whom they have caring responsibilities;
- To enable the applicant to move to more suitable accommodation and to prevent unnecessary admission into care;
- To enable someone to move nearer to someone who can offer them support.

4.14 CMPs are often awarded for furniture and white goods where the property that an applicant is going to be moving into does not have these and the applicant does not already have the essential items.

- A breakdown between the different types of payments and average awards in 2013/14 is given in the table below, which illustrates that there are more crisis payment awards made, but that the community payments (for white goods and furniture) are for a much greater amount on average:

Award type	Number	Average award	Total
White goods and furniture	395	£386.01	£152,473.95
Living expenses - crisis payments	620	£79.39	£49,221.80
Other - includes rent in advance, travel	27	£156.58	£4,227.66
Total	1042	£197.62	£205,923.41

4.15 Although the current scheme is open to any age (16 and above), the distribution of applicants for LWA does not mirror either the census figures for Brent or those in receipt of Housing Benefits, for example:-

- 5.6% of LWA applications are made from customers aged 60 or over, but this compares to 28.3% of Brent residents who are receiving Housing Benefit or Council Tax Support and 17.9% of general population in Brent¹;

¹ Information from 2013/14 LWA statistics

- 54.3% of LWA applications are made from customers in the age range 35 to 54 – this compares to 33.8% of the general population in Brent and 44.8% of Housing Benefit and Council Tax Support recipients.

4.16 The split between genders is more in line with general population (53.9% of LWA applicants are male compared to 50.3% in the census figures). However, the average award to women is almost twice as much as to men (£171.28 per award compared to £90.40)¹.

4.17 24.7% of applications are from lone parent families and the awards in these cases are higher on average (as allowances are higher when there are children in the household). This explains why the average awards to women tend to be higher because 94% of lone parent applications had a woman as the lone parent.

4.18 66.1% of applicants were made from single people and in this category, most (71%) are from men.

4.19 In terms of applications for LWA and ethnicity, the following table shows the split of applications by ethnicity compared to census information and those in receipt of Housing Benefit and/or Council Tax Support;

Ethnicity	LWA	Census	Benefits
Asian	10.45%	34.06%	22.85%
Black	49.55%	18.84%	34.55%
Mixed	4.09%	5.07%	3.97%
White	35.91%	36.27%	34.18%
Other	0.00%	5.77%	4.45%

Possible deficiencies in the current scheme

4.20 From the information above and meetings held with administrators of the scheme, a number of scheme deficiencies have become apparent and these include the following:-

- Pensioners are significantly under-represented in terms of the number of applications for LWA. It may be necessary to target this group to ensure they are aware of the scheme and the circumstances that money may be available for them, if it is desired to continue to offer the scheme to this group (the previous Social Fund scheme was not available to pensioners)

- Similarly, applications from Asian households are lower than the general population would suggest. The reasons for this (and the issue raised in the preceding paragraph) will be investigated as part of a planned Equalities Impact Assessment;
- In some cases, customers do not fit into the eligibility criteria (see Appendix A) but nonetheless are faced with a financial crisis and in need of short term assistance; for example pregnant applicants facing financial crisis who will only meet the eligibility criteria on the birth of their child but may require assistance before that;
- Many applicants make more than one successful application during the year for both CSPs and CMPs. (There is a limit of two annual awards for both payments). Due to the nature of a CMP award, it is unlikely that a second award in the same year should be considered save in exceptional circumstances;
- Applicants are not currently required to provide extensive corroborating evidence when submitting an application primarily due to the nature of the requests and the administrative burden of insisting on documentary evidence. However, there have been a number of successful applications where no capital was disclosed and who subsequently were found to have savings over the permitted thresholds.

5. Recommendations for the 2015/16 scheme

5.1 Taking into account the likely funding arrangements moving forward, the deficiencies identified above, the under-utilisation of the scheme to date and the opportunity presented to review and retarget the scheme, there are a variety of options available for the LWA in 2015/16 which are summarised below:-

	Option	Option appraisal
1.	Scheme to be kept unchanged	Administratively simple but any anomalies in the current scheme will remain.
2	Maintain scheme objectives as now but address any anomalies	Fairly easy to implement and any shortcomings discovered during the last 20 months can be addressed.
3	Fundamentally review the scheme	Allows a one council approach to helping vulnerable residents to be explored, but too difficult within time constraints to do for 2015/16 and best left until future funding arrangements are known.
4	Current scheme but with more restrictive eligibility criteria	Would allow current funding to last longer, but wouldn't address scheme anomalies and would increase administrative costs per successful application.

5	Have the scheme (one of the options above) administered by the voluntary sector	Could save on administrative costs but would need robust monitoring procedures – needs significant work to explore viability and cost effectiveness of this option.
6	Abolish the scheme altogether	The current underspend could be retained and used for other strategic initiatives, but some of the most vulnerable residents in Brent would lose access to this route for help in the event of crisis.

Option recommended

5.2 It is recommended to undertake Option 2 for 2015/16, subject to a more fundamental review of the scheme in preparation for 2016/17 (Option3).

5.3 The recommended amendments to the current scheme are:-

- Increase the maximum period for a Crisis Payment award to up to 14 days or exceptionally up to whenever the customer will receive their next regular income where appropriate;
- Align the calculation of Crisis Payment awards to a percentage of the Housing Benefit Applicable Amounts (rather than Council Tax Supports Applicable Amounts);
- Allow discretion outside of the eligibility criteria in exceptional circumstances;
- Expand the list of qualifying criteria for eligibility, and;
- Removal of two specific restrictions currently placed on customer eligibility.

5.4 The rationale for each recommendation is as follows:-

Increase the maximum period for a Crisis Payment award to up to 14 days or exceptionally up to whenever the customer will receive their next regular income where appropriate

5.5 The current scheme makes provision for awards up to seven days. The recommendation is to give up to 14 days but with the additional provision that this may be extended up until the customer’s next payment date at officers’ discretion. This would mean that residents that are suffering severe hardship would be able to receive some assistance for all the period of hardship until their next regular income was received, rather than just for seven days

Align the calculation of Crisis Payment awards to a percentage of Housing Benefit Applicable Amounts

5.6 The current scheme is based on the applicable amounts – the customer’s ‘needs’ - as set out in the Local Council Tax Support scheme. It is recommended to align the calculation to the Housing Benefit Applicable Amounts, the national figure, which are slightly higher. It is recognised that

needs are more closely linked to a national scheme which benefits from inflationary increases rather than the local council tax scheme where applicable amounts have been frozen since 2012/13.

Allow discretion outside of the eligibility criteria in exceptional circumstances

- 5.7 The current scheme has no provision for making an award where the basic eligibility criteria have not been met. It is recommended, subject to appropriate controls and in exceptional circumstances, to enable a discretionary award to be made where the customer is likely to experience exceptional hardship if a payment is not made, but whose circumstances do not meet the normal criteria for eligibility.

Expand the list of qualifying criteria for eligibility

- 5.8 The list of qualifying benefits is fairly restrictive in the current scheme and it is recommended to add to the list those benefits which define vulnerability in Brent's Local Council Tax Support Scheme. The additional qualifying benefits which would allow an application to be considered are as follows:-

- Disability Living Allowance;
- Personal Independence Payment;
- Armed Forces Independence Payment;
- Disabled Person's Tax Credit;
- Attendance Allowance;
- Constant Attendance Allowance;
- War Pensioners Mobility Supplement;
- Severe Disablement Allowance;
- Incapacity Benefit;
- Employment & Support Allowance (support component)
- Disabled Persons Reduction for Council Tax purposes;
- War Disablement Pension;
- War Widow's Pension, and;
- Carer's Allowance.

Removal of two specific restrictions currently placed on customer eligibility

- 5.9 It is recommended that two restrictions in the current scheme preventing customer's eligibility to claim should be removed so that the following apply:-
- A customer may be eligible for an award of LWA even if they are eligible to claim a Short Term Advance (loan) from the DWP, where exceptional circumstances apply;
 - A customer on bail may be eligible for an award of LWA.

Publicity and Communications

- 5.10 The publicity and communications plans will be reviewed and extended in order to seek greater take up of the scheme by those who need it and promote the proposed amendments to the scheme. This will be primarily achieved through targeted publicity for example, to those affected by other welfare reforms. The publicity methods will include e-mail and text messages as well involving front line staff in promoting the scheme. It is also intended to ensure that Brent Customer Services works more closely with internal and external stakeholders to identify applicants at the point of crisis wherever the resident presents themselves.
- 5.11 The publicity budget will be increased from this year's figure of £3,000 and this will be funded by the underspend identified elsewhere within this report.

Consideration of awarding loans rather than grants

- 5.12 In order to increase the available funds, consideration was given initially – and again when reviewing the Local Welfare Assistance Scheme – to awarding loans rather than grants.
- 5.13 However, the cost of administering a loan rather than a grant would be prohibitive when considering the relatively small value of the awards. Whilst the DWP were able to recover these payments from ongoing entitlement to their benefits, no such facility exists for Local Authorities so we would have to invoice in every case and often there would be little prospect of recovery. Our view is also that the nature of the payment is reflecting the vulnerability of the customers and that by definition, the customer would struggle to repay the money as their income is already at a very low level.

Fundamental Scheme Review for 2016/17

- 5.14 It is recommended that a more fundamental review of the LWA scheme for 2016/17 is to be undertaken during 2015, to look specifically at the following:-
- The models adopted by other authorities (see 5.11 for more details);
 - Review the success of the current scheme against its stated objectives
 - Review internal funding for all discretionary expenditure including social services to ensure that the council has a holistic approach in assisting our most vulnerable residents;
 - To consider Partnership working as a whole and review the role of the voluntary sector either in signposting or administering the scheme;
 - Consider whether there is a role for Credit Unions in helping some residents through loans with the LWA fund picking up interest payments on these loans, and;

- Consider assistance other than money – for example, vouchers for specific items, food banks and furniture swaps.

5.15 In undertaking this review, consideration would be given to models adopted by other authorities including:-

- Outsourcing to the private sector which fixes (and cuts) administrative costs but has been criticised for losing the local perspective;
- Involving one or many voluntary sector agencies in distributing the funds. Costs and savings vary on the model adopted and the advantages and disadvantages of this type of approach requires significant analysis as well as comparison against keeping the scheme in house for this to be considered as a recommended option;
- The option (mentioned in 5.10) of not given monetary payments other than in exceptional circumstances and instead using an alternative method of meeting the particular crisis or emergency whether this be food banks, furniture swaps, vouchers for specific items at specific stores etc.
- More fundamentally, utilising the remaining funds to help build the capacity of the voluntary sector to operate certain schemes directly (eg. white goods / furniture recycling etc), and then signpost all claimants to those schemes avoiding cash payments altogether.

5.16 The draft timetable for the scheme review is included as appendix B.

6 Consultation

6.1 There is no statutory obligation to conduct a consultation but it is proposed that the scheme review next year will include a full 12 week consultative period. However, for the limited changes proposed for 2015/16, it was decided to conduct a 5 week consultation between 07/11/14 and 15/12/14 available to all online and specifically to invite comments from stakeholder groups; approximately 100 groups were contacted directly. A shorter period of consultation has been applied in this case for the 2015/16 LWA scheme to enable responses received to be evaluated and determined and the report to the Cabinet to be submitted and considered whilst allowing sufficient time for any changes to be made before the beginning of the next financial year in April 2015.

6.2 Six responses were received, five from Brent residents and one from a voluntary sector organisation.

6.3 The online questionnaire asked specifically whether respondents agreed with the recommendations detailed in paragraphs 5.4 to 5.9 above (and which were considered to be the most important). Respondents could also add

comments to explain why they did or did not agree with the recommendations and also on the merits of a fundamental scheme review.

- 6.4 Five out of the six responses either agreed strongly or agreed with the recommendations to use Housing Benefit Applicable Amounts as a basis for calculating Crisis Payments and in allowing discretion outside of the eligibility criteria. For the other recommendations, the responses were split exactly between agreeing or disagreeing with the proposals (strongly or otherwise).
- 6.5 However, whilst three of the responses had reservations in relation to the recommendations detailed in paragraphs 5.5, 5.7 and 5.9 this was, in part, due to funding concerns. For example, one respondent (when expressing reservations about extending the maximum period for a crisis payment to 14 days) said that 'in principle this may seem like a good idea but if the Local Authority are facing cut backs how can we afford to do this?'
- 6.6 Funding issues were mentioned three times more in relation to the scheme review for 2016/17 although one respondent felt that payments should not be restricted this year in order to fund the scheme in subsequent years.
- 6.7 As the funding for the scheme is secured from underspends for at least two years, the results from the consultation are broad agreement for the recommendations. It is likely that there will be a much bigger engagement next year.
- 6.8 As there are only five individual responses, an analysis of the demographic of these residents has not been done.

7 Financial implications

- 7.1 The total amount of non ring-fenced Government funding provided for the scheme amounts to £1.7m over the first two years of the scheme for the direct provision of welfare assistance and a further £346,000 for administration costs.
- 7.2 In 2013/14 the total expenditure on welfare assistance was £205,923 in Crisis and Community payments. The expenditure to November this year is £166,194 in payments and the forecast expenditure for the whole of 2014/15 is £250,000.
- 7.3 Taken together with minor savings in the amount allocated for administration costs that are also anticipated, it is estimated that approximately £1.3m will remain unspent at the end of the current financial year.
- 7.4 As the option recommended for the LWA scheme in 2015/16 will not be using funding outside of those allocated by the government for the purpose of administering this scheme, including current and previous underspends, there is no other financial impact on the Council's own resources.

- 7.5 Note that abolishing the scheme would mean that the forecast £1.3m underspend from previous years would be available to be used as one off funding for other strategic initiatives.

8 Legal Implications

- 8.1 There is no statutory requirement to offer a Local Welfare Assistance scheme and the design and administration of any such scheme is at the discretion of the Local Authority. However where changes to an existing scheme are proposed or to end a local welfare assistance scheme altogether, there is a requirement to evaluate any potentially adverse impact to protected groups and to consider whether there is justification for the change and how any impact could be mitigated.
- 8.2 Pursuant to the Welfare Reform Act 2012, Community Care Grants and Crisis Loans for general living expenses (including rent in advance), which were administered by the Department for Work and Pensions, were abolished from April 2013. These loans were replaced by local provision by local authorities.
- 8.3 Community Care Grants were primarily intended to help vulnerable people live as independent a life as possible in the community. They were awarded to households receiving means-tested benefits such as Jobseekers Allowance. Crisis Loans were intended for applicants unable to meet their immediate short term needs in an emergency or as a consequence of a disaster. They were awarded for immediate living expenses in order to avoid serious damage or risk to the health or safety of the applicant or a member of the family.

Equalities – Public Sector Equality Duty

- 8.4 The public sector equality duty, as set out in section 149 of the 2010 Act, 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, and 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.
- 8.5 The “protected characteristics” are: age, disability, race (including ethnic or national origins, colour or nationality), religion or belief, sex, sexual orientation, pregnancy and maternity, and gender reassignment. Marriage and civil partnership are also a protected characteristic for the purposes of the duty to eliminate discrimination.
- 8.6 Having “due regard” to the need to “advance equality of opportunity” between those who share a protected characteristic and those who do not includes having due regard to the need to remove or minimise disadvantages suffered by them. Due regard must also be had to the need to take steps to meet the needs of such persons where those needs are different from persons who do not have that characteristic, and to encourage those who have a protected characteristic to participate in public life. The steps involved in meeting the

needs of disabled persons include steps to take account of the persons' disabilities. Having due regard to "fostering good relations" involves having due regard to the need to tackle prejudice and promote understanding.

- 8.7 The Council's duty under section 149 of the Equality Act 2010 is to have "due regard" to the matters set out in relation to equalities when considering and making decisions on the provision of localised council tax support for the area of Brent. Due regard to the need to eliminate discrimination, advance equality and foster good relations must form an integral part of the decision making process. When the decision comes before the Executive, Members of the Executive must consider the effect that implementing a particular policy will have in relation to equality before making a decision. An Equality Impact Assessment will assist with this.
- 8.8 There is no prescribed manner in which the equality duty must be exercised, though producing an Equality Impact Assessment is the most usual method. The Council must have an adequate evidence base for its decision making. This can be achieved by means including engagement with the public and interest groups and by gathering detail and statistics on who claim under the Local Welfare Assistance scheme. There is no prescribed manner in which the equality duty must be exercised, though producing an Equality Impact Assessment is the most usual method.
- 8.9 Where it is apparent from the analysis of the information that the policy would have an adverse effect on equality, then adjustments should be made to avoid that effect and this is known as "mitigation".
- 8.10 The public sector equality duty is not to achieve the objectives or take the steps set out in section 149 of the Equality Act 2010. The duty on the Council is bring these important objectives relating to discrimination into consideration when carrying out its public functions. The phrase "due regard" means the regard that is appropriate in all the particular circumstances in which the Council is carrying out its functions. There must be a proper regard for the goals set out in section 149 of the 2010 Act. At the same time, when the Members of the Cabinet make their decision on the Local Welfare Assistance scheme, they must also pay regard to countervailing factors which it is proper and reasonable for them to consider. Budgetary pressures and economic and practical factors will often be important. The amount of weight to be placed on the countervailing factors in the decision making process will be for Members of the Cabinet to decide when it makes its final decision.

9 Equalities Impact Assessment (EIA)

- 9.1 An Equalities Impact Assessment was carried out for the existing scheme but as there will be an impact on groups with protected characteristics (albeit positive) a further analysis has been done. This is included as Appendix C.
- 9.2 No equalities groups are affected in a negative way as a consequence of the proposed changes to the Local Welfare Assistance Scheme. However, there is a positive impact on disabled residents as it is proposed to widen the

eligibility criteria to include those in receipt of a number of welfare benefits awarded as a result of a resident's disability.

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