

People Overview & Scrutiny

Date: **14 July 2026**

Time: **4.00pm**

Venue: **Hove Town Hall - Council Chamber**

Members: **Councillors:** Parrott (Chair), Miller (Deputy Chair), Cattell, Czolak, Mackey, McLeay, McNair, Shanks and Winder.

Co-Opted Members: Lesley Hurst (Church of England diocesan representative), Maria Cowler (Catholic Church diocesan representative), Sara Fulford (Older People's Council), Joanna Martindale (Community Works Rep), Adam Muirhead (Community Works Rep), Fiona England (PaCC), Dr Anusree Biswas (Community Works), Kendrick Tugwell (Parent Governor Rep), and Ilona Bradley Reijonen (Youth Council Rep)

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Chief Executive

Hove Town Hall
Norton Road
Hove BN3 3BQ

Date of Publication - Monday, 6 July 2026

AGENDA

Part One

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5 PROCEDURAL BUSINESS

(a) Declaration of Substitutes: Where Councillors are unable to attend a meeting, a substitute Member from the same Political Group may attend, speak vote in their place for that meeting.

(b) Declarations of Interest:

(a) Disclosable pecuniary interests;

(b) Any other interests required to be registered under the local code;

(c) Any other general interest as a result of which a decision on the matter might reasonably be regarded as affecting you or a partner more than a majority of other people or businesses in the ward/s affected by the decision.

In each case, you need to declare:

(i) the item on the agenda the interest relates to;

(ii) the nature of the interest; and

(iii) whether it is a disclosable pecuniary interest or some other interest.

6 MINUTES

7 - 26

6.1 To agree the draft minutes of the People Overview & Scrutiny Committee meeting held on 17th March 2026.

6.2 To agree the draft minutes of the Special People Overview & Scrutiny Committee meeting held on 2nd June 2026.

7 PUBLIC INVOLVEMENT

To consider the following items raised by members of the public: (a) Petitions: To receive any petitions presented by members of the public to the full Council or to the meeting itself; (b) Written Questions: To receive any questions submitted by the due date of 10am on the 8th July 2026; (c) Deputations: To receive any deputations submitted by the due date of 10am on the 2nd July 2026.

8 MEMBER INVOLVEMENT

To consider the following matters raised by Members: (a) Petitions: To receive any petitions submitted to the full Council or to the meeting itself. (b) Written Questions: To receive any written questions from members. (c) Letters: To consider any letters submitted by Members. (d) Notices of Motion: To consider any Notices of Motion.

9 CHAIR'S COMMUNICATION

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Ward Affected: All Wards

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Further information

For further details and general enquiries about this meeting contact Luke Proudfoot, (, email Luke.Proudfoot@brighton-hove.gov.uk) or email democratic.services@brighton-hove.gov.uk

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In most meetings, there are no incidents and Council is not disturbed. We hope this continues so there is no need for the Mayor or any Chair of a meeting to take these actions.

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- Do not re-enter the building until told that it is safe to do so

BRIGHTON & HOVE CITY COUNCIL

PEOPLE OVERVIEW & SCRUTINY

4.00pm 17 MARCH 2026

HOVE TOWN HALL COUNCIL CHAMBER

MINUTES

Present: Councillors Parrott, Cattell, Lyons, Mackey, Shanks, Sheard, Winder and Sykes

Other Members present: Sara Fulford (Older People's Council), Joanna Martindale (Community Works Rep), Adam Muirhead (Community Works Rep), Fiona England (PaCC), and Dr Anusree Biswas (Community Works)

PART ONE

46 APPOINTMENT OF CHAIR

46.1 Giles Rossington, Scrutiny Manager, said:

“Good afternoon and welcome to this meeting of the People Overview & Scrutiny Committee. I’d like to inform those present that this meeting is being webcast live and will be capable of repeated viewing.

Neither the Chair nor the Deputy Chair of People O&S Committee are in attendance today. Committee Procedure Rules state that “In the absence of the Chair or Deputy Chair at a meeting of a Committee or Sub-Committee, those voting Members present shall elect a person from amongst their number to preside over the meeting”. (Committee Procedure Rule 3.3)

I therefore need to ask if any member wishes to nominate themselves as Chair for this meeting only.”

Cllr Sam Parrott nominated herself as Chair.

Giles Rossington said:

“Thank you. Does the committee agree that Cllr Parrott be elected as Chair for this meeting?”

This was agreed.

47 PROCEDURAL BUSINESS

- a) Cllr Sykes for Cllr Mcleay
- b) There were no declarations of interests

48 MINUTES**48.1 RESOLVED**

The draft minutes of the 19th January 2026 Special People Overview & Scrutiny Committee meeting were approved as a correct record of the meeting.

The draft minutes of the 28th January 2026 People Overview & Scrutiny Committee meeting were approved as a correct record of the meeting.

The draft minutes of the 19th February 2026 Special People Overview & Scrutiny Committee meeting were approved as a correct record of the meeting.

49 PUBLIC INVOLVEMENT

49.1 Daniel Harris asked a public question. The Chair responded as follows:

Thank you for your question. Cabinet will be considering the future of the Large Panel System (LPS) blocks, including St James House, Nettleton Court and Dudney Lodge and the North Whitehawk Bird Blocks, at a Cabinet meeting on Thursday this week.

If Cabinet agree to proceed with the demolition of the LPS blocks a rehousing process of all residents living within the blocks will begin and be carried out in a phased way over a number of years – homes will certainly not disappear overnight.

The intended trajectory accounts for the possibility of needing to move Temporary Accommodation tenants from these blocks over the council's Medium Term Financial Plan, and the potential reduction in these homes is partly offset by the intended increase in acquisitions of new council homes and an expansion in block-booked arrangements.

50 MEMBER INVOLVEMENT

50.1 There was no member involvement.

51 CHAIR'S COMMUNICATION

51.1 The Chair gave the following communication:

As the Labour Group's nominee to take the vacant position as Chair of the People Overview & Scrutiny Committee, I'd like to thank my predecessor, Cllr Jackie O'Quinn for her work over the last couple of years as the first Chair of the People Overview & Scrutiny Committee.

Today we have a report on changes to temporary accommodation, giving us the opportunity to feed into the consultation on these changes. It is very important that scrutiny takes part in this as, if approved by Cabinet, these changes will have a big impact on temporary accommodation and council housing in the city.

I understand that Cllr Gill Williams is due to join us for this item straight from work and so I'm going to change the order of the items listed on the agenda so that this will be our final item this evening.

The committee's current Task & Finish Group on antisocial behaviour in social housing will shortly be coming to an end. It was due to report to this committee but following Cllr O'Quinn's resignation from the Labour group, and therefore from the Task & Finish Group, members of the group felt it necessary to have an extension to enable them to come up with an excellent set of recommendations rather than rush to put something together. I agree that this is the best way forward. They will now report to the next scheduled meeting of the committee in July. In the meantime, we can be thinking about the subject of the next Task and Finish Group and therefore we will now have a discussion on potential ideas that members may have.

We are joined today by new members of the Youth Council one of whom will be joining this committee. They are Ilona, who is here in person, and Clemmie and George who are joining us online. Welcome to all three of you, I look forward to working with you.

52 CONSULTATION ON USE OF EMPTY COUNCIL HOMES AS TEMPORARY ACCOMMODATION

52.1 Cllr Gill Williams, Cabinet Member for Housing, and Harry Williams, Director for People Housing Services, presented to the committee. The main points were:

- the exceptionally high levels of demand
- the social and financial impact of this demand
- the changes that the council wants to make including reducing the number of nightly paid units and increasing the number of council owned TA units
- improving outcomes for residents
- reducing the financial pressure on the council
- the ongoing consultation on the use of empty homes as TA
- the use of the committee's feedback to shape the next phase and its inclusion in the report to cabinet in April

52.2 Cllr Lyons asked how the current numbers in TA compare with previous figures, asked how many of them were from Brighton & Hove, requested the number of voids and a list of them, and asked about the length of time for properties being voids. Cllr Williams said that the numbers in TA had gone up significantly, with very few from outside Brighton & Hove. She said that where people were from outside the city it was because the council had a statutory duty to help them, such as those from the armed forces or those experiencing domestic violence. She said providing a list of voids would cause problems. Harry Williams said that they had a statutory duty to help those who are homeless and would consider people's local connections and if necessary, would send them to their own council. He said that the growth in those in TA was largely from single men with mental health problems. He said that he did not have the numbers on void turnarounds but could provide these.

52.3 Cllr Cattell asked for information about the process of spot purchasing. Harry Williams said that because of the demand they had to use any property and that spot purchasing providers would let them know when properties became available.

52.4 Cllr Sheard asked about the use of HMOs as temporary accommodation rather than turning them back into large homes as many single people would live in HMOs in the private sector. Cllr Williams said that they had looked at acquisitions and that many HMOs were no longer being used for student accommodation and could be turned into much needed four-bedroom council homes.

52.5 Jo Martindale asked about support for people living in TA. Harry Williams said that moving into a better home was support itself. He added that the Homelessness & Rough Sleeping Strategy included increased support for people in TA including wrap around care and help to move into permanent accommodation. He said that they were exploring more support for families in TA.

52.6 Cllr Sykes said that he was in favour of the policy and asked about its interaction with the allocations policy. He asked about the expected savings £665k to general fund with pressure on HRA of £500k, which is like a transfer from the general fund to HRA. Harry Williams said that the allocations policy applies to Homemove whereas this policy was using some of the properties that would have gone on them for TA. He said that there were already 260 TA properties in HRA account and it is normal to use HRA homes as temp accommodation and the rent would go back into HRA. Harry said the pressure on HRA was how quickly they could turn homes around.

52.7 Adam Muirhead asked how the council planned to mitigate the loss of HRA to ensure that this short-term solution for TA does not undermine the long-term goal of increasing supply and quality of social housing and support for young council tenants. Harry Williams said that the rental income coming from the properties will still sit in the HRA account. They have expert officers helping people to pay their rent. He said that they needed to be clear with cabinet that there would be a greater turnover of people because of the transient nature of TA. Harry said that it was not stopping them increasing supply and acquiring new homes.

52.8 Cllr Mackey asked if the policy would help families that are moved into TA in places like Eastbourne and those who have been in TA for a long time. Cllr Williams said that those in TA can bid on permanent homes and that they were increasing supply. Harry Williams said that they had successful housing solutions team. He said that they had demand that was greater than supply but that they wanted to increase the supply particularly for children.

52.9 Sara Fulford asked if the council was doing enough to prevent homelessness and about the impact on older people's housing. Cllr Williams said that they had an excellent homelessness prevention team. Harry Williams said that prevention was the top priority and they recognised that TA was not the solution. He said that seniors housing was exempt and would not be used for TA.

52.10 Cllr Shanks said that it would have been good to have seen the responses to the consultation. She also mentioned that TA isn't quick and that people would be in there for a long time. She said that we needed action from the national government such as rent controls. She also asked if people would then be asked to bid on the TA homes that they were living in. Cllr Williams said that it was a problem that people were in TA for too long, but she said that at least they were in better quality TA. Harry Williams said that TA was not the solution but part of a process. He said that they had around 200 responses and that there was a mix of responses, which he would be happy to share after the consultation. He said that there were 5800 people on the housing register as well as 2200 in TA and that they had to balance them.

52.11 Dr Anusree Biswas asked about safeguarding and complex needs such as domestic violence victims, equity of access such as language or digital barriers, and about the standards that empty homes needed to meet. Harry Williams said that on safeguarding part of the housing assessment was to look at needs and link people with agencies as required. Regarding equity of access, he said that the criteria of access was set out in legislation and that they had a matrix to allocate fairly. He said that there was a list of standards for properties and as they were in control of the properties, they could meet them.

52.12 Fiona England asked about families in these TA properties and if there could be flexibility to allow them to bid on the homes that they would be living in. Harry Williams said that they would not be able to bid on the properties but could bid on other properties. He said that he did hear the committee's views about whether the homes should be used as permanent homes. Fiona said that sometimes flexibility to allow people who have been in the properties for a long time might be helpful to the whole system. Harry said that they do have a direct offer ability under very exceptional circumstances, but it is used rarely to ensure fairness.

52.13 Cllr Shanks asked about the allocations policy and why couldn't the people living in these TA properties for extended periods be given a preference for a permanent tenancy. Cllr Williams said that the point was that they don't have much TA and that turning TA into permanent homes reduced the amount of TA. She said that they were building more homes and that these families could bid on other homes in the area. Harry Williams said that they were trying to transform the TA portfolio and needed to build more homes.

52.14 The Chair asked about the risks of extension, and the criteria for ending, amending, or extending the policy. Harry Williams said that the proposal was for a 12-month extension with a decision due to be made at cabinet. He said that the greatest impact would be on those currently on the register. He said if extended it would be 20% of properties in the year and that they would be trying to smooth it over the year to mitigate the impact.

52.15 The Chair asked how the council were engaging with people in TA now. Harry Williams said that they have had responses from people in TA and that email was the most effective way. He said that they had also engaged with the lived experience group, and the TA Action Group. He said that there was always more to do to engage more.

52.16 No specific recommendations were made by the committee. Feedback on the policy was provided during the discussion, and the draft minutes of the meeting will be shared as a response to the consultation.

53 DISCUSSION OF NEXT TASK & FINISH GROUP

53.1 The chair said that some good idea had already been sent to her, but she felt that some might be better as agenda items brought to the committee rather than Task & Finish Groups, and that the same might be the case with suggestions at the meeting. These would be raised with senior officers as potential committee agenda items.

53.2 The following were suggested by members:

- Drugs policy
- Youth strategy
- Equitable rights to care

- Accessibility of council services
- Young people's mental health
- Cost of living support
- Improving council consultations
- Mental health across all age ranges
- Ensuring consultations are reaching those who are digitally excluded

53.3 The chair said that young people's mental health and improving consultations & engagement seemed to be preferred by members of the committee. She said that officers would go away and scope both ideas to bring them back for a vote. The other ideas would be fed into work programming.

The meeting concluded at 6.02pm

Signed

Chair

Dated this

day of

BRIGHTON & HOVE CITY COUNCIL

PEOPLE OVERVIEW & SCRUTINY

2.00pm 2 JUNE 2026

HOVE TOWN HALL - COUNCIL CHAMBER

MINUTES

Present: Councillor Parrott (Chair) Cattell, Czolak, Mackey, McLeay, McNair, Shanks, Winder and Guilmant.

Co-Optees: Kendrick Tugwell (Parent Governor Rep).

PART ONE

1 PROCEDURAL BUSINESS

- 1.1 Substitutions – Cllr Guilmant for Cllr Miller. Apologies from Sara Fulford, Jo Martindale, Adam Muirhead, Lesley Hurst, Dr Anusree Biswas.
- 1.2 Declarations of interest – Cllr Czolak declared an interest as a Governor of the Sussex Partnership NHS Foundation Trust.
- 1.3 Exclusion of press and public – The Chair read the following statement on the potential exclusion of the press and public: Amongst the papers circulated to elected members were confidential (Part 2) papers from the Cabinet Meeting. Any discussion of these papers will need to be in confidential session and will need to exclude the press & public from these discussions. We will move into a Part 2 confidential session towards the end of the meeting, if members indicate that they wish to discuss information shared in the Part 2 papers. All committee members are reminded not to raise matters contained in the Part 2 documentation during the public meeting.

2 CALL-IN OF UPDATE ON THE HOUSING MANAGEMENT FOR THE BRICKFIELDS DEVELOPMENT

2.1 The Chair said “This is the first time that People Overview & Scrutiny Committee has held a call-in meeting under our new governance arrangements, and I would like to thank everyone for finding the time to attend at short notice.

I’d like to start off by briefly explaining the purpose of a call-in meeting. If anyone has any questions, I’m sure that Giles will be happy to respond.

Call-in is an essential, and legally required, part of any Leader & Cabinet governance model. The council has to have a process in place that allows non-executive members to challenge a decision of the executive, after it has been taken but before it has been implemented.

Call-in is not intended to be used frivolously or simply because members disagree with a decision. For a call-in request to be accepted, the members requesting the call-in must detail why they think the executive decision was flawed. The Council's procedure rules list a number of legitimate grounds for call-in, as well as requiring that a call-in request be signed by at least 6 members from at least 2 political groups.

If a call-in request is made, and if the request is accepted by the Chief Executive, after consultation with the council's Monitoring Officer, then a meeting of the relevant Overview & Scrutiny committee must be arranged within 7 days of the submission of the call-in request. We are here today because a call-in request has been submitted and accepted.

At the call-in meeting, the committee will hear from one of the members who submitted the call-in request – in this instance Cllr Sykes. Once the member presenting the call-in request has spoken, they will take no further active part in the meeting, although they are welcome to observe public proceedings.

The committee will then hear from the relevant cabinet member, in this instance Cllr Alexander; and from officers if a detailed explanation of issues is necessary.

After this, committee members will have the opportunity to ask questions of the Cabinet Member to assist the Committee in reaching its decision on the call-in. The Cabinet Member may refer to officers to provide the response as they consider appropriate.

Having heard from the member requesting call-in and from the Cabinet Member and officers, and having had the opportunity to ask questions of the Cabinet Member and officers, committee members will then debate whether to accept or reject the call-in.

Members will note that one of the possible actions for the call-in committee is to refer the Cabinet decision to full Council. Just so we're clear, an O&S committee can refer a decision that has been called in to Council, but only if the committee believes that the decision was contrary to the budget and policy framework previously agreed by Council. There is no role for Council in determining call-in requests other than in this context. As today's call-in request does not suggest that the Brickfields decision was contrary to the budget and policy framework, I think it's unlikely that we'll want to refer to Council.

There are two other options. The committee can decide that the original executive decision was properly made, in which case the decision may be implemented immediately. Or it can decide that the original executive decision was not properly made and refer it back to Cabinet for re-consideration. If the committee chooses to refer the decision back to Cabinet, members must agree reasons for the referral.

It is very important for members to bear in mind that they are not being asked to debate the merits of the original executive decision. The historical decisions to close Knoll House and to redevelop the site as a specialist unit for people with Acquired Brain Injuries were made by Policy & Resources Committee in July 2021 and are not being debated today. Rather, they are being asked to consider whether the 14th May 2026 Cabinet decision was properly made, given the concerns about process outlined in the call-in request.

I appreciate that members will need some context in order to make the decision on whether to refer the decision back to Cabinet or not, but I do ask that we try to limit questions to the process of decision-making. I will stop questioners if they are veering too far from the brief of the committee.

I am also keen that we conduct as much of this meeting as possible in public session. When we come to questioning Cabinet members and officers, I would therefore strongly request that members think carefully and reserve any questions about confidential papers until there are no more questions that can be taken in public session. This is not to impede the democratic process, but rather to ensure that we do nothing that might compromise the completion of contractual negotiations.

If members do need to discuss confidential papers, this will need to be in Part 2 session. This means that the press and public will be excluded from this part of the meeting. Members have had the confidential report from the Cabinet meeting shared with them. A decision was taken by the Monitoring Officer that this report should be redacted to remove particularly sensitive information that was not considered relevant to the call-in. This is in accordance with the Council's Constitution Part 3E Point 23.3 which states that confidential documents should not be shared with scrutiny members unless this information is relevant to their enquiry.

Finally, when the committee comes to decide whether or not to refer the Brickfields decision back to Cabinet, only voting members, that is Councillors, will vote. Non-voting members are otherwise welcome to play a full part in questioning and debating the issue.

I would like to ask Cllr Ollie Sykes to introduce the call-in request. You are then welcome to stay in the council chamber and observe any or all of the public session."

2.2 Cllr Sykes presented to the committee and said "Call in rationale – risk of poor deal for council. That judgement based on reading the May cabinet paper.

There's much more to this however. Having pressed the button on the call in I got the job of going through the history, since 2019. There are many questions remaining around the decision itself and remaining uncertainties and risks. Questions about changes in the council's position over the lifetime of this project. Questions about previous assessment of risks and scheme viability. Questions about transparency and making information available for Cllrs to scrutinise. Opportunity for lesson learning.

Good news – came in under budget - £10.5m to £6.2m – lesson learning there too – how did we achieve this – are we getting our original cost estimating and risk management right?

Three areas of comment to inform scrutiny: Present decision, remaining uncertainty, lessons learned.

1. Present decision. The decision here is awarding a long lease to one RP from a shortlist of one. That RP will fulfil the Landlord function as set out in papers. BHCC will have no further financial involvement, other than repayment of capital borrowing; the point being that we have passed what has become a 'problem' to someone else. The reason for the RP to take on a lease of a building is that there is a revenue stream from rents and service charges paid by supported housing tenants. Alternatives to the recommended decision offered in the May 2026 paper are (a) BHCC manages the building (b) we find alternative uses for the building (an extraordinary option offered after all the investment in a bespoke building).
2. Areas for scrutiny on BHCC as landlord:
 - a. A leading option in historic papers was that BHCC will fulfil the landlord function, while the care and support functions would be most cost-effectively sourced from a specialist provider. Quote from 2021 BC: *There are two options for the provision of the housing management. The Council's Housing Department could manage the building and carry out ongoing repairs and maintenance. Knoll*

House is located on a BHCC estate and next to 2 sheltered housing schemes therefore there are teams and services already in the area. BHCC staff could be involved from the outset and be involved in the property development to ensure it fits with current repairs and maintenance provision. The 28 people living at Knoll House would have tenancies and the Council would receive income in rent or Housing Benefit / Universal Credit. Specialist inhouse resources would support the ongoing running of the scheme for example the Housing Adaptations Service are currently, and would continue to, assist with individually adapting the flats and Trusted Assessors would be able to make minor adaptations. This is working very successfully at Brooke Mead, another Council managed Extra Care scheme for people with dementia. Yet the present paper states 'the council has limited experience and capacity to manage a specialised supported living service with the level of responsiveness that is required'. What has changed?

- b. Soft market testing back then for the landlord function indicated interest from at least 4 RPs – how have we ended up with just one?
 - c. Reclaiming intensive housing management costs. This is an important part of the rationale for losing the landlord function to a RP and the paper states we would lose £60k /year. Quick AI query gave this result: *A council that is a Registered Provider can recoup Intensive Housing Management costs via Enhanced Housing Benefit. In fact, doing so as an RP is financially advantageous because it allows the council to claim a full 100% subsidy from the DWP. However, the council must ensure the costs are strictly property/tenancy-based, transparently costed, and that the accommodation satisfies the legal definitions of Specified Accommodation.* If we cannot in fact recoup these costs, why was this not flagged previously? Lessons learned.
 - d. S4.2 of paper. Secure tenancies for life as an issue under BHCC management. Council tenants have secure tenancies although as a council we do have the option to provide limited term flexible tenancies. Surely we have known this since the start of scheme appraisal. Are secure tenancies really an issue for the cohort of tenants Brickfields was created for, and if so why not raised before?
 - e. S4.2 of paper. Rights to succession as an issue under BHCC management. Only one of the 27 flats has space for two people – how is this an issue? If it is an issue it is not new, so why not raised previously?
 - f. Social Housing (regulation) Act 2023 and need to meet Consumer Standards. Obligation to create a specialist supported housing service. How do we support places like Brooke Mead? If this is indeed an issue, as it is new legislation – why was not flagged at the time during scheme development?
3. Remaining areas of uncertainty with the proposed way forward
 - a. Best consideration. Not allowed to see part 2 papers which is a bit odd as I have signed the code of conduct as we all have. We know from the paper that the proposed award will not cover the project development costs of £6.2m. I imagine there's a loss of a few million for us. The Jan risk register said if this happened *'it would have a significant impact.'* A key question is whether we will see savings overall, as of course we still also have to repay capital borrowing over 50 years.

Question there about the interest rate – in original papers was set at 2% - now much higher of course.

- b. Best consideration. Paper states under Legal Implications: *In exercising the delegated authority to finalise the terms and enter into the lease and any ancillary documentation, Director and Cabinet Member will need to be satisfied that the requirement to obtain the best consideration reasonably obtainable continues to be met.* When there is only one offer, how can we say that is best consideration?
- c. Legal implications: Subsidy Control Act 2022. We will need to ensure compliance with this Act. From AI: Public authorities (such as local councils and devolved governments) must assess every subsidy against seven statutory principles to ensure they represent effective use of public money:
 - i. *Subsidies must be aimed at a specific public policy objective.*
 - ii. *They must be proportionate and necessary to achieve that objective.*
 - iii. *Subsidies must be designed to change the economic behaviour of the beneficiary.*
 - iv. *They should represent an efficient use of public resources.*
 - v. *They must not unduly affect competition or investment within the UK.*
 - vi. *Subsidies must avoid negative impacts on international trade and investment.*
 - vii. *Subsidies should yield positive contributions to a well-balanced economy.*
- d. Legal implications: It is proposed that the Registered Provider will be required to enter into a lease with the council with a requirement to enter into contractual arrangements with the care support provider that has been procured by the council. Further legal agreements may be required to secure use of the property for the same purposes beyond the expiry of the contract with the care provider and this will be subject to further legal advice.
- e. Risk implications. RP seeks to change use. Risk register indicates mitigation *'Appropriate covenants will be put in place to ensure that any change to the use of the building can only be carried out with the council's agreement.'* Covenants can be changed. This goes to the heart of the matter – we award a lease, lose control of the building. Is this committee happy with this mitigation?

4. Lessons learned.

- a. One unfortunate headline. Looking across all the historic papers – we had ideas on the table in 2019, 2020 – ready to go at Jan 21 – cost £1.3m, 20 beds, savings £600k /year. What we have – ready Sept 2026, savings unclear, cost £6.5m. What could have been – five years of savings at £600k /year not achieved.
- b. Transparency. Access to papers. Nothing to any committee or cabinet between July 2021 and Jan 2026. But loads happened in the meantime. Why?
- c. Risk management. What actually happened was not flagged in any early risk register. In particular concerning regulatory issues now driving us to award this lease to an RP – secure tenancies, social housing act, recouping intensive housing management costs. Why were these not spotted before? Also we overestimated costs originally – not good as prevents development.

2.3 Cllr Alexander, Cabinet Member for Adult Social Care, presented to the committee. She said that she was surprised by this call in but as happy to be scrutinised as she felt the right decision had been made. She explained what the Brickfields sight was going to be used for and the difference that it will make to residents of the city with acquired brain injuries. She said that of the 15 providers originally interested Southdown was the last remaining as the others

had pulled out for various reasons, such as the size of the scheme, the length of the lease, and the operating model. Having tested the market this was expected. She said that the 125-year lease was a condition set by Homes England for funding. She said that there would be secure covenants restricting any change of use. She explained that the council had considered running the scheme but thought that it would be too expensive, incur too much risk, and that there was a lack of expertise at the council to run such a scheme. She also explained that there was a risk that if the council were the land-lord and a resident were to no longer require the level of care needed then they could not remove the tenancy. Cllr Alexander went on to explain the financial value of the scheme, saying that although the £6.187m would not be covered that an independent red book valuation confirmed best consideration for the asset in its present use. Leasing to a registered provider could mean £500,000 annual saving. She said that if the council were the landlord there would be increased borrowing, and lower benefits income. She said that the scheme was ready to accept residents from September and that delays would have a financial impact on the council as well as an impact on potential residents.

2.4 Cllr Guilment asked why they could not open up the process again, having gone from 15 providers at the start to only one remaining. Anne Richardson-Locke said that there were a variety of reasons such as some thinking the lease was either too short or too long, for others it did not fit their operating model. She said that there was another provider that they got into negotiations with but they withdrew. She said that Southdown was committed to the city, that it was a good offer and that they wanted to work with them. Cllr Alexander said that some providers did not like that the council required the properties to be let out at council rent price.

2.5 The Chair asked if they had considered looking again for providers. Genette Laws said that they had, but that it was a niche and small market, and that they had been through reputable organisations.

2.6 Cllr Guilment asked if they had also looked at national providers. Anne Richardson-Locke said that they had looked at both national and local providers.

2.7 Cllr McNair asked about the length of the lease and if increasing it might have attracted more providers, citing the need to get best value for those paying. He also asked if they had considered increased rents to attract other providers, and who the other 14 providers were. Anne Richardson-Locke said that other providers had requested longer but then withdrew. She said that Homes England funding required a minimum of 125-year lease and also required social rent. Andy Witham said that the other providers who wanted a longer lease had other conditions for the building.

2.8 Cllr Cattell asked what was wrong with the council running the service in house. Anne Richardson-Locke said that if the council was the landlord then all of the development costs would need to be borrowed, and that the council would receive less of the Intensive Housing Management costs back. Genette Laws said that the council could only claim 60% of this back unlike a registered provider who can claim 100%.

2.9 Cllr Cattell asked what the difference was between Brickfields and the Brooke Mead Extra Care Housing scheme. Genette Laws said that cabinet had to make a decision on Brickfields in May and officers were confident that officers had made the right recommendation.

2.10 Cllr Shanks asked about previous plans to run the scheme internally, and about giving flexible tenancies. Genette Laws said that she could not speak on the previous report and that

risks had changed since then, with the current report written about the present risks. She also said that if tenants had a secure tenancy there was the issue of a partner without a brain injury inheriting the tenancy and living in a flat needed by someone with an acquired brain injury. Andy Witham said that they had explored the tenancy issue for a long time and found it very difficult and that it didn't fit with this operating model. Anne Richardson-Locke said that the original business case had two options, lease or council, and assumed it would be the council. However, going to a registered provider to secure Homes England funding needed conditions such as the 125-year lease and council rents.

2.11 Cllr McLeay asked about the borrowing and the savings around the scheme. Genette Laws said that the savings in this year's budget were £300,000, as the scheme was opening part way through the year, and would have annual savings of £500,000. She said that she had explained at cabinet that this was both a good deal in terms of the financial savings but also for the people who needed the facilities, which is why it was done quickly to avoid delays. Anne Richardson-Locke said that the interest used was 5.5%. Cllr McLeay asked if the savings would be maintained. Genette Laws said that they would.

2.12 Cllr Mackey asked about procurement and market benchmarking. Genette Laws said that they approached as many providers as possible and were left with only one standing. She said that the red book valuation showed accepting it was a good offer.

2.13 Cllr Guilmant asked about the 125-year lease and if the scheme could have happened without the Homes England funding. Genette Laws said that technically it could have but it would have increased the financial pressure. She said that five years ago was a very different place financially and in the sector. She added that the decision made was based on the risks now, and that May's report updates on the Cabinet report in January. Andy Witham said that costs had gone up since 2019/2020 and that there were lots of risks.

2.14 Cllr Czolak asked about the urgency for the decision and the need for the scheme. He acknowledged that the council weren't experienced in this area and asked if this had changed. Genette Laws said that the need is still there as there were 28 flats with around 80 people who could move into them. She said that the service was very niche and that the care provider would be separate from Southdown. Andy Witham said that the relationship between the care and housing provider was important and that they would work well together and are local.

2.15 Cllr Czolak asked about the unique needs of the residents and if they can be met by Southdown. Genette Laws said that the housing decision was very different from others and fits the needs and behaviours of the residents.

2.16 Cllr Winder asked about the service model. Anne Richardson-Locke said that within the development there was space for the registered provider and the care provider ensuring 24 hour support from the care provider and that their expectations that both the housing and care provider would work to integrate the service into the local community.

2.17 Kendrick Tugwell asked about benchmarking quality of the provider. Genette Laws said that the care provider was to be separate from the housing provider and that the care provider was done under a separate procurement. She said all care providers in the city were rated by the CQC Good or Outstanding. Anne Richardson-Locke said that housing providers also had to meet the requirements of the Housing Regulator.

2.18 Cllr Mackey asked about the possibility of long-term voids and drop off in income. Anne Richardson-Locke said that there was such a long list of people that could move in that long term voids were unlikely to happen. She said that if it were to happen they could discuss potential changes with the registered provider.

2.19 Cllr Shanks asked if Brooke Mead was contracted out or if the council hired people to run the specialist service. Andy Witham said that Brooke Mead was an extra care facility and the council was the landlord with external care service.

2.20 The Chair asked about KPIs and performance management, and if there were break clauses. Anne Richardson-Locke said that there were no break clauses as it was a 125-year lease but that if they didn't meet the criteria they could look to reassign the lease.

2.21 At this point the committee moved into Part 2 proceedings.

2.22 Following the end of Part 2 proceedings the Chair said "we are ready to discuss our decision. I would like to remind members that our options are either to agree that the challenge to the decision should be taken no further and the decision should be implemented, in which case no further action is required of this committee; or to agree that the decision should be referred back to Cabinet for reconsideration. If we choose to refer back, we must agree reasons for the referral – for example, saying which aspects of the decision-making we have identified as problematic."

2.23 Cllr Guilmant stated his support for recommendation 2.1.

2.24 Cllr Shanks said that she disagreed with this but felt she would be in the minority.

2.25 Cllr McLeay said that a review in the future would be welcome.

2.26 Cllr McNair said that there were lessons to be learnt but he felt it was better to go to specialists and not have the council run the service. He said that he supported recommendation 2.1.

2.27 Cllr Alexander agreed to bringing a review in a year's time when the service will be operational and outcomes – for residents and the council - can be reported on.

2.28 **Resolved:**

The People Overview & Scrutiny Committee determine that the challenge to the decision called-in should be taken no further and the decision may be implemented

3 CALL-IN OF UPDATE ON THE HOUSING MANAGEMENT FOR THE BRICKFIELDS DEVELOPMENT

As per Part 2 Minutes.

4 PART TWO PROCEEDINGS

The meeting concluded at 3.53pm

Signed

Chair

Dated this

day of

Document is Restricted

Brighton & Hove City Council

People Overview & Scrutiny Committee

Agenda Item 10

Subject: Adult Social Care Improvement Plan Update

Date of meeting: 14th July 2026

Report of: Chair of People Overview & Scrutiny

Contact Officer: Name: Luke Proudfoot
Email: luke.proudfoot@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: No

For general release

1. Purpose of the report and policy context

- 1.1 The Adult Social Care Improvement Plan was presented to People Overview & Scrutiny Committee in January 2026.
- 1.2 During this committee meeting members agreed that they would like to monitor the progress of the Adult Social Care Improvement Plan and requested that an update be brought to committee after six months.

2. Recommendations

- 2.1 People Overview & Scrutiny notes the progress of the Adult Social Care Improvement Plan.

3. Context and background information

- 3.1 A new regulatory framework for Local Authorities with responsibilities for Adult Social Care was announced in 2022, first pilot inspections were completed by early 2024. Brighton & Hove was notified of the Inspection Process starting in November 2024, with onsite inspection completed in April 2025.
- 3.2 The Regulatory Framework measures how well Local Authorities deliver their responsibilities under Part 1 of the Care Act 2014.
- 3.3 A report has been completed by CQC and has given the overall rating for Brighton & Hove City Council as 'Requires Improvement' with a score breakdown below.

Quality Statement	Score
Assessing Needs	1
Supporting people to live healthier lives	2

Equity in experience and outcomes	2
Care provision, integration and continuity	2
Partnerships and communities	2
Safe pathways, systems and transitions	2
Safeguarding	2
Governance, management and sustainability	2
Learning, improvement and innovation	2

Score 1 – shows significant shortfalls (inadequate), Score 2 shows some shortfalls (Requires Improvement), Score 3 shows a good standard (good). Score 4 shows an exceptional standard (outstanding).

- 3.4 The CQC issued Brighton & Hove a section 50 notice for score of 1 in Assessing Needs, which means that they gave formal notice of the judgement to the Secretary of State for Health & Social Care. As a result of this the Council worked closely with Local Government Association to complete a response plan, which was shared with Department for Health & Social Care.
- 3.5 The Section 50 notice highlighted two main areas of concern; Waiting times for assessment including waiting well procedures and completion of annual reviews. The Adult Social Care Improvement Plan addresses these areas of concern and includes other performance areas.
- 3.6 During scrutiny of the Adult Social Care Improvement Plan in January 2026, People Overview & Scrutiny Committee agreed that they wanted to receive an update on the progress of the Improvement Plan after six months.
- 3.7 The attached report to cabinet provides an update on the progress of the Adult Social Care Improvement Plan.
- 3.8 The cabinet report is due to be presented to cabinet in September and is therefore in a draft format. Data within it will be updated as required ahead of September cabinet.

4. Analysis and consideration of alternative options

- 4.1 None for this scrutiny report. Please see cabinet report at appendix 1.

5. Community engagement and consultation

- 5.1 None for this scrutiny report. Please see cabinet report at appendix 1.

6. Financial implications

- 6.1 There are no direct financial implications as a result of this report. The Adult Social Care Improvement Plan will inform budget development and the Medium-Term Financial strategy of the Council. Any changes in service delivery will be subject to recommissioning processes and will need to be delivered within the available budget.

Name of finance officer consulted: Brian Smith Date consulted:03/07/26

7. Legal implications

- 7.1 The Health and Social Care Act 2022 and associated regulations provide CQC with statutory powers to independently assess how well Local Authorities deliver their responsibilities under Part 1 of the Care Act 2014.
- 7.2 Where one or more of the quality statements is given a score of 1 by CQC, pursuant to Section 50 of the Health and Social Care Act 2008 (as amended), CQC must inform the Secretary of State for Health and Social Care.

Name of lawyer consulted: Sandra O'Brien Date consulted: 25/06/26

8. Risk implications

- 8.1 None for this scrutiny report. Please see cabinet report at appendix 1.

9. Equalities implications

- 9.1 None for this scrutiny report. Please see cabinet report at appendix 1.

10. Sustainability implications

- 10.1 None for this scrutiny report. Please see cabinet report at appendix 1.

11. Health and Wellbeing Implications:

- 11.1 None for this scrutiny report. Please see cabinet report at appendix 1.

14. Conclusion

- 14.1 Members are presented with the requested update on the progress of the Adult Social Care Improvement Plan and are asked to note its progress.

Supporting Documentation

1. Appendices

- 1. Draft Cabinet Report on progress of Adult Social Care Improvement Plan

Brighton & Hove City Council

Cabinet Report Template

Cabinet

Subject: Improving Outcomes in Adult Social Care

Agenda Item

Date of meeting: Thursday, 17 September 2026

Report of: Cabinet Member for Communities, Equalities, Public Health & Adult Social Care

Lead Officer: Name: Corporate Director for Homes & Adult Social Care

Contact Officer: Name: Steve Hook, Edward Yeo

Email: Steve.Hook@Brighton-hove.gov.uk
Edd.yeo@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: Yes

Reason(s) Key: Is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

1.1 Following the February 2026 Cabinet Paper on the Adult Social Care Improvement Plan, this report will update on progress on agreed actions highlighting improved outcomes for residents requiring care and support under the Care Act 2014. The Improvement Plan is designed to fulfil statutory obligations arising from regulatory judgement by the Care Quality Commission and to set targets for additional areas of improvement.

1.2 This report will also explain the next phase of Care Quality Commission Inspection Framework and the requirements for Brighton & Hove City Council.

2. Recommendations

2.1 Cabinet notes the progress of Adult Social Care Improvement Plan as part of bi-annual update

2.2 Cabinet notes the next stage of Care Quality Commission (CQC) Inspection Framework including anticipated expectations for Brighton & Hove

3. Context and background information

3.1 Care Quality Commission (CQC) Inspection Framework – as reported in February Cabinet Paper

3.1.1. A new regulatory framework for Local Authorities with responsibilities for Adult Social Care was announced in 2022, first pilot inspections were completed by early 2024. Brighton & Hove was notified of the Inspection Process starting in November 2024, with onsite inspection completed in April 2025. The final inspection outcome was received in December 2025.

3.1.2. The Regulatory Framework measures how well Local Authorities deliver their responsibilities under Part 1 of the Care Act 2014.

3.1.3. A report has been completed by CQC and has given the overall rating for Brighton & Hove City Council as 'Requires Improvement', with a score breakdown below;

Quality Statement	Score
Score Assessing Needs	1
Supporting people to live healthier lives	2
Equity in experience and outcomes	2
Care provision, integration and continuity	2
Partnerships and communities	2
Safe pathways, systems and transitions	2
Safeguarding	2
Governance, management and sustainability	2
Learning, improvement and innovation	2

Score 1 – shows significant shortfalls (inadequate), Score 2 shows some shortfalls (Requires Improvement), Score 3 shows a good standard (good). Score 4 shows an exceptional standard (outstanding).

3.2 Section 50 notice – as reported in February Cabinet Paper

The CQC has issued Brighton & Hove a section 50 notice for score of 1 in Assessing Needs, which means that they will give formal notice of the judgement to the Secretary of State for Health & Social Care. As a result of this The Council will work closely with Local Government Association to complete a response plan, which will then be shared with Department for Health & Social Care.

The Section 50 notice highlighted 2 main areas of concern; Waiting times for assessment including waiting well procedures and completion of annual reviews. The Adult Social Care Improvement Plan will address these areas of concern and include other performance areas as explained in the document.

Since the CQC Inspection on-site visit there has been significant improvement in the key areas, specifically Annual Reviews and wait times in teams explained further below.

3.2.1 Update

Since the Section 50 notice was issued Brighton & Hove has been working closely with a Department of Health & Social Care Advisor, who has been attending regular meetings both as 1-1's with key members of staff and monthly Improvement Board meetings. The Improvement Board is the key operational group delivering on identified workstreams, chaired by Director of Adult Social Services (DASS) and attended by senior managers in Adult Social Care.

DHSC advisor has recognised the progress made against key actions and we are anticipating the Section 50 notice being reviewed in Autumn 2026.

3.3 Brighton & Hove City Council – Learning Organisation Framework

Adult Social Care Improvement Plan will;

- **be connected** – Adult Social Care are working closely with support from external stakeholders (e.g. Department for Health & Social Care, Local Government Association, Benchmark authorities) and Internal Stakeholder with experience of regulation (Children's Social Care and Housing Regulation). This will ensure we identify best practice examples and can build from shared experiences.
- **be confident** – the areas identified by regulation for Adult Social Care and national benchmarking have given a clear indication of improvement areas, and we know that improvement in those areas will lead to improved outcomes for residents and results in future regulation.
- **be innovative and creative** – Adult Social Care have identified opportunities to introduce new ways of working and new technology to support delivery of key actions. E.g. use of digital tools to support case work and speed up processes around reviews and maintain contact whilst individuals wait for a service.
- **be diverse and inclusive** – Adult Social Care are pleased to have a diverse workforce that reflects the diversity of Brighton & Hove. The diversity of our workforce is monitored as part of a national programme and have an established infrastructure to ensure we continue to hear from minority groups in the city.
- **be healthy and psychologically safe** – Adult Social Care have recognised that our staff played an important part in the CQC Inspection and will continue to monitor responses by Adult Social Care staff in Staff Surveys and engagement opportunities.

3.4 Areas of Improvement

As a result of the Requires Improvement judgement, Brighton & Hove have been working closely with Local Government Association (LGA) to support the improved outcomes. The support offered by LGA is offered to all Local Authorities who received Requires Improvement or Inadequate rating. Copied below are the key areas of improvement that were submitted for the

Stage 3 (6 months after release of CQC report) return completed in June 2026

3.4.1 'Early wins'

We have made significant progress in our Residential Admissions reporting. Following clarification from DHSC, we have brought ourselves in line with national benchmarking and separated services users who have been discharged into the community into residential placements as part of aftercare provision of s117 of the Mental Health Act, from our Care Act reporting. This has meant a significant improvement explained below

- Move from 15th in peer group to 3rd in peer group for Residential & Nursing Placement for 18-64 year olds
- Move from 14th in peer group to 7th in peer group for Residential & Nursing Placement for 65+

We are also anticipating further improvement in benchmarking when a new reporting system of client-level data is fully implemented.

3.4.2 Prioritised Actions and Updates

Prioritised actions	Update
Expanded Reablement Offer	Having appointed a Senior Programme Manager for Reablement, we have reviewed case files to help support the case for an expanded Reablement offer. As part of the review we have evidenced the opportunity for an expanded reablement programme and remodelling of existing services. The business case has identified a pilot phase, which we anticipate launching in July 2026.
Reduced number of placements in Residential & Nursing Homes	As described above we have made significant improvement in our benchmarking performance following clarification on data returns by DHSC. Having established a task & finish group we have now returned this to business as usual approach, channelling the work into our existing meetings with other Council departments including Housing colleagues.
Reduced Wait Times for Assessment	As described above we are working closely with our Care & Health Improvement Advisor (CHIA) via the LGA to source external support to review our pathways and embed a culture of proportionality. We have introduced new tools in proportionate reviews, which have now launched and are being

	monitored within teams.
Waiting Safely Framework	Waiting Safely Framework has successfully launched and is well understood by operational teams. As part of the framework we have included approaches to contact, which will be monitored by our performance team. The categorisation of cases will support improvement in data quality identifying anomalies at team level and further improve confidence in our reporting
Increased Annual Reviews	We have achieved the target of 45% of annual reviews completed on time in 2025/26 and have a further target to improve to 55% for 26/27. We have allocated targets to teams, which can now be monitored on a regular basis. This will spread the targets throughout the year and give each team a focus on regular reviews.

3.5 Future CQC Approach

Care Quality Commission has recently briefed Local Authorities on the next phase of Inspection Framework. Regulation was reintroduced for Local Authorities in 2024, with previous Inspections delivered in 2010/11, the first phase was an opportunity for 'baselining' to understand the performance of Local Authorities and how that compared nationally. The next phase of the Inspection Framework is to move to a regular pattern and a 'business-as-usual' approach. This means that;

- Quality Statements will be the same – How Local Authorities work with people, Providing Support, Ensuring Safety within the System and Leadership
- Stronger focus on unpaid carers experience and improved co-production processes
- The end-to-end process will be shortened, lasting 19 weeks from the point of notification to the publication of the report.
- Communication approach will change, with more regular meetings and longer time on site (5 days)
- Rating characteristics have been introduced to provide clarity on how the overall judgement was reached and areas for improvement

3.6 Next Steps

3.6.1 Self-Assessment

To prepare for the new Inspection Framework, explained further below, Adult Social Care teams will start a series of workshops to help develop an updated Self-Assessment. The Self-Assessment will be in keeping with new

guidance published by CQC and will incorporate learning from the previous years experience. When complete the Self-Assessment will be shared with Lead Member for Adult Social Care for oversight.

3.6.2 Proportionality & Pathways Workshops

As previously mentioned we are working closely with Local Government Association, who are supporting all Local Authorities with a Requires Improvement judgement. The LGA will support Brighton & Hove Council in delivering workshops to review all of our assessment pathways and help embed a culture of proportionality. The LGA support will help with our management of waiting lists.

4. Analysis and consideration of alternative options

- 4.1 CQC Inspection has highlighted areas of improvement for Adult Social Care in Brighton & Hove that match our self-assessment completed at the start of the Inspection Framework. In identifying and addressing those areas there has been improvement in key metrics explained in this report. If performance had continued on a similar trend (e.g. low performance on annual reviews, under-utilised re-ablement and high residential admissions) there would have been a deterioration in resident outcomes and compliance with statutory duties. The next phase of Inspection Framework will support our continuous improvement journey, engaging with staff and ensuring better outcomes for residents with adult social care needs.

5. Community engagement and consultation

- 5.1 Brighton & Hove Council has engaged closely with internal & external stakeholders since the introduction of CQC Inspection Framework. The regular communication will continue and include;
- Email communication for regular updates, before the Inspection timetable has been announced, during the Inspection and post Inspection result
 - Regular updates at Cabinet member briefings and all-party briefings where required
 - Workshops delivered by Brighton & Hove and supported by LGA
 - All staff briefings chaired by Director of Adult Social Services (DASS) explaining our current performance, the Inspection process and how staff will be involved.
 - Other communication – video's, briefing notes and team meetings
 - Regular attendance and participation at regional groups to maximise learning opportunities.

6. Financial implications

- 6.1 There are no direct financial implications as a result of this report. The Adult Social Care Improvement Plan will inform budget development and the Medium-Term Financial strategy of the Council. Any changes in service

delivery will be subject to recommissioning processes and will need to be delivered within the available budget.

Name of finance officer consulted: Brian Smith Date consulted (03/07/26)

7. Legal implications

- 7.1 The Health and Social Care Act 2022 and associated regulations provide CQC with statutory powers to independently assess how well Local Authorities deliver their responsibilities under Part 1 of the Care Act 2014. Where one or more of the quality statements is given a score of 1 by CQC, pursuant to Section 50 of the Health and Social Care Act 2008 (as amended), CQC must inform the Secretary of State for Health and Social Care.

Name of lawyer consulted: Sandra O'Brien Date consulted 16/06/26

8. Risk implications

- 8.1 Increasing Complexity of Need – The number of open Adult Social Care clients in Brighton & Hove has increased from 3,652 in June 2025 to 3,771 in April 2026, a net increase of 119 clients, or 3.3%. This sits within a changing pattern of demand, with 571 new clients open in April 2026 who were not open in June 2025, offset by 452 clients who were no longer open by April 2026. Open agreements increased from 5,194 to 5,419, suggesting that growth reflects both additional clients and increased service intensity for some existing clients.
- 8.2 The largest areas of growth are in Community Support Services, Supported Living and Direct Payments/Individual Budgets, with notable increases across working-age adult mental health, physical support and learning disability home and day care services. This indicates continuing pressure from more complex and varied need across the city, including increased reliance on community-based support and higher-intensity packages

9. Equalities implications

- 9.1 The implementation of the Adult Social Care Improvement Plan has several key equality implications given the CQC findings and Council's Statutory Duties under Care Act and Public Sector Equality Duty. The Improvement Plan will positively impact groups with protected characteristics, ensuring that they have equity in access, assessment and when in receipt of services. By addressing key improvement areas in wait times, reablement and residential admissions outcomes will improve for those individuals and their families.

10. Sustainability implications

- 10.1 N/A

11. Health and Wellbeing Implications:

11.1 N/A

Other Implications

12. Procurement implications

12.1 N/A

13. Crime & disorder implications:

13.1 N/A

14. Conclusion

14.1 The Adult Social Care Improvement Plan provides a clear framework for responding to the CQC judgement and strengthening outcomes for residents who draw on care and support. Progress has already been made in key areas, including annual reviews, waiting safely arrangements, reablement planning and improved use of performance data. Continued delivery of the plan, alongside refreshed self-assessment and preparation for the next phase of CQC assessment, will support the Council to evidence sustained improvement, meet its statutory duties, and maintain a clear focus on safe, timely and person-centred support for residents and unpaid carers in the city.

Brighton & Hove City Council

People Overview & Scrutiny Committee Agenda Item

Subject: Progress report about delivering our Housing Strategy

Date of meeting: 14 July 2026

Report of: Cabinet Member for Housing

Lead Officer: Corporate Director Homes & Adult Social Care

Contact Officer: Diane Hughes

Tel: 01273 293159

Email: diane.hughes@brighton-hove.gov.uk

Ward(s) affected: All

Key Decision: Yes

Reason(s) Key: Is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

1.1 The Brighton & Hove Housing Strategy (2024-29) was agreed by Full Council in October 2024 and sets out the vision on how best to deliver the city's housing objectives based around the following five priorities:

- Improve housing quality, safety, and sustainability
- Deliver the homes our city needs
- Prevent homelessness and meet housing need
- Promote improved health and wellbeing for all
- Provide resident focused housing services

1.2 The strategy contributes to the delivery of all four strategic outcomes in the Council Plan 2023 to 2027. It contains actions that will help us create a city to be proud of, a fair and inclusive city, and a healthy city where people thrive. It also contributes to our goal of being a responsive council with well-run services. The action plan focuses on our efforts to deliver accessible, affordable, and high-quality homes for everyone in Brighton & Hove. This

report provides an update on the progress made towards our objectives during 2025-26 and confirms actions for 2026-27.

2. Recommendations

- 2.1 That committee considers and comments on the progress made towards the ambitions set out in the Housing Strategy 2024-29 and actions to be undertaken in 2026-27 as set out at Appendix 1.

Context and background information

- 3.1 The Housing Strategy sets out a long-term vision linked to a programme of work designed to tackle the city's housing challenges and priorities. In the second year (2025-26), 37 strategic actions were identified. Some were stand-alone pieces of work with others covering activities that will continue throughout the lifetime of the strategy. 22 of these actions are complete with the remaining 15 progressing. Where work is continuing into 2026-27 these actions are included in the Year 3 action plan at Appendix 1.

Priority 1: Improve housing quality, safety, and sustainability

- 3.2 Ensuring the safety and quality of our council homes remains a priority for the council. Helping residents live in well-maintained, healthy homes is a key investment objective, supported through our Housing Revenue Account (HRA) capital programme. In 2025/26 we invested over £44m in improving existing council homes, including increasing our investment in damp and condensation measures as well as our overall investment in planned and major capital works, in addition to sustainability and health & safety measures. In 2026/27 this figure rises to £54m.
- 3.3 This year the council has made steady progress towards achieving compliance with the housing safety and quality standard. This progress means more homes are meeting the required safety standards more consistently, ensuring residents are safer in their homes. We have continued to engage with the Regulator of Social Housing with regular updates to Cabinet and Place Overview & Scrutiny Committee to ensure ongoing oversight and accountability. The last update was considered at Cabinet on [14 May 2026](#).
- 3.4 We have continued to move away from a reactive approach to a structured compliance model with progress being made across all key safety areas. We have:
- Achieved 100% Fire Risk Assessments (FRA) across all building types and reduced the number of remedial actions during the year from 2,294 to 1,466

(of which 1,464 are low risk actions). In tandem we have also targeted intervention and investment to ensure fire safety for example through the Bristol Estate upgrades, fire alarm commissioning and progress with developing Personal Emergency Evacuation Plans (PEEPS) with vulnerable tenants.

- Made positive progress with water safety with completed risk assessments up to 96.7% from 64% over the year with 1,061 overdue actions. We recognise that we are not yet where we should be on water safety and this remains a top priority.
- Made steady progress with our electrical testing programme which is on track to reach compliance by the end of 2026. 97% of homes have had an electrical test certificate (within 5 years of issue) alongside 86% of communal areas.
- We are compliant across gas safety, smoke alarm detection and asbestos management.

3.5 To support this progress and embed the learning from our root cause analysis, we have created a Housing Improvement Plan (Safety & Quality) which outlines how we will be a great landlord that tenants can have confidence in. Development of the plan was supported by our five pillars in the Learning Organisation Framework, bringing together the impact we want to have on resident experience, what the regulator expects through the consumer standards and what the housing service must do to deliver safe, good quality homes and a resident-focused, data-led reliable service.

3.6 Steady progress was made in reducing the responsive repairs backlog, with volumes declining through the first half of 2025/26. However, proactive activity to support compliance with Awaab's Law significantly increased demand, with 8,287 jobs outstanding by the end of March. The impact of the proactive activity has driven substantial follow-on work across multiple trades, while increased engagement with residents to raise awareness of how to report repairs has also contributed to higher demand. Addressing and reducing this level of outstanding works will be a key priority for the service in the year ahead.

3.7 Featuring prominently in our work programmes has been a commitment to tackling damp and mould within our own homes. Our identified capital investment budget for condensation & damp works for 2025/26 to 2029/30 is £7.166m. Awaab's Law has provided the council with the opportunity to do things differently. To achieve the requirements, we have:

- Ensured we have embedded an approach of early identification and intervention resulting in faster response times to ensure safer living conditions.
- Significantly increased activity before the law came into force, completing 1,100+ damp and mould jobs between July–Sept 2025 with damp

technicians carrying out initial investigation surveys on first visit, identifying root causes (not just symptoms) and setting out clear follow-on works and timescales.

- Set up a new specialist team in October 2025 focused specifically on damp and mould. This included specially trained technicians who carry out fast inspections, undertake initial treatment with structured follow-up reporting to residents as required.
- Produced a Damp & Mould Policy with feedback from tenants helping to shape the final policy.

3.8 We have continued to be committed to our net zero ambitions. We are installing on average 6-8 new solar Photovoltaic (PV) systems each week with over 930 now installed across the housing stock. We have also begun our retrofitting programme with 16 of our least efficient homes now achieving minimum EPC ratings. We completed the decarbonisation of our Seniors Housing scheme Walter May House which will create warmer, more comfortable homes for our tenants with lower energy bills. In addition, we are scoping out a council wide strategic energy partnership to support the journey to net zero.

3.9 Continued investment in our housing stock is key to ensuring our assets are well maintained and our five-year programmes for major and planned capital works commenced. In May 2026 Cabinet approved our Asset Management Plan which is a one-year operational framework for managing and investing in council housing stock and estates. Knowing our stock and our assets is key to this. With less than 20% of our stock having up-to-date condition data we recognise that we need to accelerate the programme and we have committed to completing a full stock condition survey on our homes over the next two years. This will create reliable evidence base and drive our future investment decisions, leading to improved quality of homes over time.

3.10 The future of the eight blocks within the three master planning areas has continued at pace this year with programme updates considered by Cabinet in July 2025 and March 2026. A Section 105 consultation took place with residents in the autumn, with 58% response rate. This was an extensive and multi-layered consultation which played a direct role in shaping the final recommendations to redevelop the eight blocks, serve initial demolition notices and adopt a formal rehousing policy and local lettings plan. Resident engagement and input remain at the heart of next steps for redevelopment of the three sites.

3.11 Improving the safety, quality and management of the private rented homes is an important priority for the city. During the year:

- 450 requests for assistance were received
- 1,093 visits took place

- 179 homes improved through our interventions.

We started preparing for the introduction of the Renters' Rights Act in May 2026 and updated our Private Sector Housing Enforcement Policy. This was agreed in April 2026 and ensured we had a legally compliant enforcement framework for the Renters' Rights Act, it strengthened action against non-compliant landlords and created a more consistent approach to housing enforcement across the city.

- 3.12 We moved into the second year of our five-year licensing schemes; across all schemes 8,694 homes are in our licensing schemes with 3,882 now fully licenced. These schemes are already helping to improve property conditions with officers ensuring compliance with licence conditions and addressing hazards that they identify. The team continue to investigate unlicensed properties with 440 unlicensed properties investigated, building on the 70 under investigation at the end of March 2025. As a result of further investigation by the Enforcement Team, 197 of these cases resulted in a licence application and 30 were exempted with the other properties under review.
- 3.13 The council is continuing to support and oversee the remediation of fire safety defects in private sector residential blocks, in line with Ministry of Housing, Communities & Local Government expectations. This includes working with Registered Providers, managing agents and freeholders to ensure appropriate access to government funding, particularly through the Cladding Safety Scheme (CSS), which is intended to accelerate the remediation of unsafe cladding and associated external wall system defects in high to medium-rise buildings. The council's role focuses on enabling progress, providing intelligence, and maintaining oversight where risks are known and over the past year the council has inspected 275 buildings in the city.

Priority 2: Deliver the homes the city needs

- 3.14 A core aim of the Housing Strategy is to deliver at least 2,000 affordable homes over the lifetime of the strategy. We will achieve this through delivering our own supply and by working with Registered Providers and developers to increase the supply of affordable housing across the city. In the first two years of this strategy, we have delivered 684 homes and have started on site with our two largest affordable housing schemes at Flintfield Drive, Moulsecoomb (222 homes) and Sackville Road (306 homes).
- 3.15 In terms of affordable housing, the last 12 months have seen 458 completions across all delivery partners. This delivery means more households are able to access settled accommodation, they experience

shorter waiting times to be rehoused, and there is greater stability for residents. Delivery will accelerate each year with forecasts showing that we are on course to meet our ultimate target of at least 2,000 new affordable homes by 2029. The current pipeline for the year ahead includes a mix of new build and acquisitions for the council.

Year	Investment	Sites/acquisitions	Target delivery
2026/27	£72m	Buy backs (130), Frederick Street (4), Former Hollingbury Library (9), Mixture of other small sites (16)	159
2025/26	£48.6m	Brickfields (28), Palace Place (11), Pocket Plots (1), Buy backs (118), St Aubyns (6)	164 - 44 of these homes will be used for TA

- 3.16 The council has successfully bid for fourth round of Local Authority Housing Fund grant funding receiving £9.2 million, which means the council has received £16.4m across all four rounds. This continues to enable us to purchase homes for council owned temporary accommodation and to also provide housing to resettle Afghan families further supporting our commitment to being a City of Sanctuary. In total since the start of the resettlement programme, we have resettled 51 households (238 individuals). The council has also submitted an expression of interest to take part in a Local Authority–led pilot to provide housing solutions for asylum seekers, testing more sustainable, community-based accommodation approaches and reducing reliance on hotel use.
- 3.17 Beyond this year the council has a longer-term pipeline of over 470 homes. We know that the need is acute with 2,200 households in temporary accommodation and over 5,000 households on the Housing Register. To deliver on our ambitions we need to sustain momentum, look at all options to unlock delivery and work with partners to deliver on the full diversity of housing required by all residents to thrive in the city. This includes ensuring that we engage with the Local Government Reorganisation programme and the Sussex and Brighton Combined County Authority (SBCCA) and its Strategic Place Partnership with Homes England to maximise opportunities for funding, delivery, and influence.
- 3.18 Building on our successful partnership with Hyde ‘Homes for Brighton & Hove’, a further site at Sackville Road is currently under construction which will deliver 306 new homes by March 2029. Further sites are being

reviewed to help the partnership meet its initial objective to deliver 1,000 lower cost homes in the city.

- 3.19 As well as new supply we want to make best use of our current homes, and we continue to work to reduce under occupation, freeing up family sized homes to let. In 2025/26 30 households moved under the Tenant Incentive Scheme, meaning 51 homes have been made available for families since the strategy was agreed. We have increased communications to promote the scheme and reach households and will be drafting a downsizing strategy in the next year,
- 3.20 Empty homes, second homes and short term lets continue to impact on the local housing market, reducing the supply of permanent accommodation in the city. A 100% council tax charge on homes empty over one year and on second homes is in place to act as a deterrent to keeping homes empty. We have worked with owners to bring 313 homes back into use over the past year with 458 homes back in use since the start of this strategy.
- 3.21 The current Government have acknowledged the impact short term lets can have and are considering their options regarding a national registration scheme and the introduction of a new planning use class. We have participated in a research project with the Department of Culture, Media and Sport to support the roll out of these proposals and expressed an interest in becoming an early pilot authority for the government's short-term lets registration scheme.
- 3.22 The council agreed to a new Affordable Housing Planning Advice Note in March 2026 to support delivery of City Plan policies. This emphasises a strong commitment to maximising affordable housing provision, reflecting significant local need. In addition, we will be launching a new Brighton & Hove City Plan process with a summer 2026 scoping consultation, building on earlier engagement to shape long-term development under the new national planning system.

Priority 3: Prevent homelessness and meet housing need

- 3.23 We have built on the Homelessness Transformation Strategy which seeks to improve the customer journey for people facing homelessness and maximising opportunities to prevent homelessness. This has included additional investment in our front door for homelessness, which is now moving to work within an early intervention space and support priorities for preventing homelessness and move on from temporary accommodation. This approach is evidenced by strong performance under the prevention duty, with successful preventions and early intervention achieved for over 500 households in 2025/26.

- 3.24 A key strategic aim is to reduce the number of households in temporary accommodation (TA), ensuring residents have access to stable housing and addressing the unsustainable financial cost of providing TA. The success in doing so is linked to homeless preventions and increasing our prevention outcomes is key to ensuring we can bring overall TA levels down. Whilst we have not succeeded in bringing down our reliance in 2025/26 (an increase to 230 households to 2,200 at the end of March 2026) the rise is reflective of both local pressures and broader national challenge leading to a disproportionate high demand for TA locally. In response to this, in April 2026 Cabinet considered a report on TA which introduced a programme of reform to stabilise costs and improve outcomes by moving Brighton & Hove's TA system away from expensive emergency provision towards a more sustainable, higher-quality, locally controlled model.
- 3.25 The Homelessness and Rough Sleeping Strategy (2025–2030) was developed through a structured, multi-stage process with a strong emphasis on resident and lived-experience input, ensuring that real experiences shaped the final priorities and actions. The strategy sets out a clear approach to preventing homelessness and through delivery of the strategy residents will experience more consistent support and improved access to services. The final strategy was approved by Cabinet in December 2025, setting out a five-year plan focused on prevention, improving TA, and providing joined-up support. Delivery will be monitored through a partnership governance model with defined outcomes, multi-agency oversight, and regular reporting through the council decision-making structures.
- 3.26 Supporting our most vulnerable residents is essential to ensure a better quality of life. We have expanded our provision of women only TA as part of our commitment to improve safety, dignity and outcomes to women experiencing homelessness. We have achieved this through new permanent TA provision alongside interim and commissioned arrangements to ensure access to safe and appropriate TA at different points in the housing journey.

Priority 4: Support improved health and wellbeing for all

- 3.27 It is important we enable residents to live in their own homes as long as possible, and the council deliver adaptations across the range of tenures to help enable this. We have delivered:

Year	Investment	Disabled Facilities Grants	Adaptations to council homes	Total major adaptations delivered
2025/26	£4.53m	131	347	478

2024/25	£4.49m	171	232	403
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- 3.28 Work is also underway for the implementation of the Supported Housing (Regulatory Oversight) Act 2023. The act places a duty on local housing authorities to produce supported housing strategies to understand current availability and future need for supported housing. The council has commissioned a needs assessment in partnership with other Sussex local authorities to inform the strategy which is due for completion in 2027. The council has also taken active steps to minimise subsidy loss on exempt accommodation.
- 3.29 We want to ensure that residents can live in safe and well-maintained neighbourhoods and feeling safe in their homes is key. To support this, we have:
- Agreed and launched our Hate Incidents Policy for council housing.
 - Established weekly estate inspections providing regular oversight on estate conditions and early identification on issues.
 - Ensured there is a consistent visible presence on our estates through our Neighbourhood Officers enabling earlier intervention on neighbourhood and ASB concerns.
 - Created an ASB action plan which will strengthen our responses to ASB through early intervention, joint working and targeted estate-based activity.
 - Continued to deliver the popular Estate Development Budget delivering physical improvements alongside activities to improve residents' physical and mental wellbeing.
- 3.30 Through the integrated care teams we have implemented the Sussex highest and ongoing needs programmes setting up five multi-disciplinary teams working with risk data to target those residents with the highest health and care needs. This enables them to deliver a proactive care service that prevents unnecessary hospital admissions and builds links between Sussex Partnership NHS Foundation Trust and supported housing. We also continued delivery of the Brighton & Hove Mental Health and Housing Plan which has including weekly case meetings and established a provider forum. We have continued funding for hospital discharge support services and increased support and accommodation in the city for those with mental health support needs. This helps to improve health and housing outcomes for some of the most marginalised people in our community.

Priority 5: Provide resident focused housing services

- 3.31 Our aim is to be a Great Landlord. To achieve this, we have a suite of programmes in operation to support us to achieve this ambition. This

includes the work to deliver against the Regulator of Social Housing consumer standards, Creating Great Homes Together Improvement Plan and the Housing (Safety and quality) Improvement Plan.

- 3.32 To be a Great Landlord we need to ensure tenants' views are at the heart of decision making in landlord services and ensure a wide range of voices are heard and listened to. We have built on last year's work and co-produced the Creating Great Homes Improvement Plan with residents. A number of pieces of work has started to deliver tenant priorities including complaints handling, restarting estate inspections and consulting on the tenant and repairs handbook.
- 3.33 Our latest STAR survey results showed positive progress with tenant perception of our services:
- 71% of respondents are satisfied with the service provided by the landlord (up 4%)
 - 77% of respondents indicating that we treat them fairly and with respect (up 1%).
 - We identified that last year that more work needs to be done to ensure we listen and act upon views noting that only 53% of respondents thought that we do. In the latest survey 63% indicated that we do, an increase of 10%. Whilst more needs to be done this is an encouraging reflection on some of the changes we have made.
- 3.34 Housing has an award-winning approach to apprenticeships and a strong track record of supporting local recruitment. The service supports 23 full time apprentices in a range of trades, with colleagues completing apprenticeships alongside their existing job roles. Our Housing Repairs & Maintenance Team have produced a video to promote diversity and inclusion in our apprenticeship programme and visited secondary schools in the city to promote this career option to young people.
- 3.35 Working in partnership to deliver the council's Adult Learning Disability Strategy an autism awareness training video was produced for our repairs and maintenance service. Specialist supported living service for autistic and neuro divergent people with assessed eligible social care needs are now being sourced through our approved provider list.
- 3.36 Providing resident-centred services is key. Examples of this work include:
- Our trauma informed approach continues to be embedded in practice with reflective practitioners in place and a further 18 members of staff receiving training this year.

- We have signed up to the LGBTQ+ Housing Pledge committing to equality, inclusivity, and safe housing for LGBTQ+ people and we'll be submitting our evidence in support of this pledge in May 2027.
- Bridging Change run a regular community group for black and racially minoritised communities at our Leech Court Seniors Housing Scheme. The group was launched in 2025 and continues to grow in participation.

4. Analysis and consideration of alternative options

- 4.1 All actions that the council commits to within the Housing Strategy need to be resourced with budgets allocated. This will ensure that an action plan is delivered. In addition, utilising partnership and external funding opportunities will be essential in delivering against the ambitions and the council will work creatively and collaboratively with partners to bring forward options for delivery.

5. Community engagement and consultation

- 5.1 Tenants deserve to be heard, respected, and involved in decisions affecting their homes. A culture of genuine engagement leads to better services and stronger communities. The increased use of different methods over the past year and improvements in tenant perceptions of our services is to be welcomed. As we enter the second year of our operational plan we need to deliver against tenant priorities which will be overseen by a working group and achieve the actions identified through the Creating Great Homes Together programme. A longer-term vision for the service also needs to be delivered through producing a Tenant Engagement Strategy.
- 5.2 The Year 3 Action Plan is reflective of feedback provided by residents on the Housing Strategy and the key areas of focus. Our priorities have also been driven by ongoing customer insight and areas of concern that have been highlighted to us by our tenants. We are using this feedback to continuously refine and improve the services we provide. As well as our tenants we need to ensure all other residents can input and contribute ensuring that we actively include and amplify the voices of minoritised groups in relevant decision-making processes.

6. Financial implications

- 6.1 The financial implications of implementing this strategy from 2026/27 onwards will be incorporated into the budget-setting processes and managed within the established budget constraints. The financial impacts must be accommodated within the budget approved in February 2026.
- 6.2 Detailed gross budgets and funding for 2026/27, covering Housing General Fund services and the Housing Revenue Account (HRA), are outlined in the February's budget report. Significant elements of the strategy depend on

financial and other resources from partners such as Homes England and MHCLG to ensure successful delivery.

- 6.3 The 2026/27 HRA capital programme reflects the required investment in Health & Safety, Building Safety and Fire Safety compliance alongside the planned maintenance, improvement programmes, major capital projects to council housing as well as new supply projects, linking investment plans to the Housing Strategy.
- 6.4 The 2026/27 budget has been set with associated savings and mitigation measures to address identified pressures, including those relating to TA demand and cost management.
- 6.5 The strategy continues to face a range of financial risks, including:
- sustained pressures within Temporary Accommodation and the need to better understand and separate HRA and General Fund cost bases;
 - the affordability and pace of property acquisitions, including the impact on borrowing capacity and associated revenue costs (management, repairs and financing);
 - increasing compliance and service delivery costs; and
 - the need to ensure that borrowing remains sustainable and does not compromise the ability to maintain existing housing stock.
- 6.6 A range of savings and service pressure mitigation measures are in place and will be monitored through Targeted Budget Management (TBM) processes. Investment has included
- 2025/26 spend of £48.6m on new supply rising to £72m in 26/27
 - 2025/26 spend of £44m on improving our homes rising to £54m on 26/27
 - £0.4m budgeted for a pilot scheme in 2026/27 as an alternative to right to buy

Any variances will be reported corporately and addressed through in-year management action where possible, with longer-term implications reflected in future budget setting and financial planning.

Name of finance officer consulted: Ferrise Hall Date consulted 09 June 2026

7. Legal implications

- 7.1 Under the Homelessness Act 2002, local housing authorities must formulate a homelessness strategy and keep it under review. Authorities can modify their strategies when circumstances change (such as new housing legislation, market shifts, or changes in partner organizations) and must consult relevant voluntary or public organizations before doing so. This report therefore is part of the statutory requirements. There has been some significant new legislation such as Awaab's law, and this has been addressed in the report.

8. Equalities implications

- 8.1 The Housing Strategy was developed with an acknowledgement that housing inequality exists in Brighton & Hove, The vision of the Housing Strategy is 'Homes for everyone' and it is anticipated that the Housing Strategy will lead to improved outcomes relating to the condition and supply of housing across the city as well as promoting resilience and improved health and wellbeing.
- 8.2 An Equalities Impact Assessment was completed when the strategy was drafted and a review of how we have addressed and delivered against our findings so far is included at Appendix 2.
- 8.3 As we have developed the new strategies and policies (listed below) equalities considerations have been embedded in both their design and their delivery. Consultations we have undertaken have includes equalities monitoring questions to understand how those strategies and policies could affect our residents and documents have included guidelines or actions to address disproportionate effects on residents with specific needs based on their protected characteristics. This will ensure the services provided close gaps on the affected communities.
- Homelessness & Rough Sleeping Strategy
 - Hate Incident Policy
 - Housing Allocation Policy
 - Vulnerability and Reasonable Adjustments Policy (in progress)
- 8.4 The services we are providing are also offering positive outcomes for people with protected characteristics, making a real change on these resident's life:
- Older people living in Seniors Housing: Extensive engagement through annual reviews, scheme meetings, referrals to partner services and, wellbeing contacts and workshops.
 - Families and young people: Delivery of 262 new family homes (2–5 beds) and development of a 29-unit supported housing scheme for young people.
 - Disability: Significant major adaptations delivered to enable residents to remain in their homes (900 households benefiting in two years), Autism awareness video produced for repairs staff. Supported living provider framework and brokerage function in place.
 - LGTBQ+: Housing Pledge has been set up, helping LGTBQ+ residents have input at executive/strategic level in addition to increase it visibility and LGTBQ+ training within the council.

Residents with intersecting protected characteristics:

- Refugees and Asylum seekers: 48 households (235 individuals) resettled through Afghan Resettlement Programme
- Multi Compound Needs: Multi Compound Needs service model developed to deliver integrated services across housing, health, and homelessness.
- Women: Women-only accommodation has been made available to ensure women victims from Domestic and/or Sexual Abuse have access to safe and appropriate temporary accommodation at different points in the housing journey.

9. Sustainability implications

- 9.1 Housing is one of the largest contributors to the city's CO2 emissions. Reducing the energy used to build, heat, and operate homes is key to achieving our Net Zero ambitions. The Housing Strategy outlines steps we are taking to address sustainability and zero carbon challenges in new and existing stock in Brighton and Hove. Taking a multi-tenure approach, our offer is shaped by working in partnership with others to deliver ambitions.

10. Health and wellbeing implications

- 10.1 Having poor quality, unaffordable, inappropriate or lack of housing directly impacts people's ability to maintain their health, well-being, and independence. Measures to improve housing quality, tackle health and safety hazards, improve the environment and increase community cohesion will have a positive impact on health and contribute to tackling health inequalities.
- 10.2 The Health Counts 2024 survey highlighted cost of living and housing concerns for respondents. 86% of respondents were taking at least one action due to increases in the cost of living with around one in five respondents (21%) fairly or very worried about their housing conditions, e.g. damp, cold, leaks etc. There are also concentrations of areas with higher levels of worries about housing conditions – 27% of those living in the most deprived areas worry compared to 10% living in the least deprived areas
- 10.3 38% of respondents recorded high anxiety scores. This increased to 46% of those in the most deprived 20% of areas, compared to 29% of those in the least deprived areas. This increased significantly to 72% for respondents living in temporary or emergency accommodation. It was also identified that those who live in social housing face substantially higher health risks with regards to four key areas – disability, smoking, recent self-harm and suicide. This insight highlights the clear link between housing and wellbeing and the

importance of the actions we are taking through the strategy to tackle inequality.

Other Implications

11. Procurement implications

- 11.1 The Housing Strategy aims to maximise overall value, including social value through our procurement and other activities. We encourage the use of local suppliers and contractors as well as identifying other opportunities to add value, for example, our in-house repairs and maintenance service provide opportunities for work experience and apprenticeships to local people.

12. Crime & disorder implications:

- 12.1 The strategy reinforces the continued need for services to support rough sleepers and those experiencing domestic abuse, and, on improving joint working with the police and other partners to ensure issues of harassment and hate crime are tackled effectively. It also identifies the need to create safe homes and neighbourhoods and to tackle crime and antisocial behaviour on our estates.

13. Conclusion

- 13.1 Progress is beginning to be made across all the Housing Strategy priorities. Whilst there remains a lot of work to do to meet our ambitions, the proposed action plan for 2026/27 provides the platform for continuing to make the required progress.

Supporting Documentation

- 1 Housing Strategy 2024-29
- 2 Annual Monitoring Report 2024/25 (Cabinet July 2025)

Appendices

Appendix 1 Housing Strategy Action Plan 2026-27

Appendix 2 Review of Housing Strategy Equalities Impact Assessment

ID	Strategic Action	Deliverables / Milestones	Housing strategy focus area	Council plan priority	Lead Officer(s)
Priority 1. Improve housing quality, safety and sustainability					
HS01	Ensure the council complies with Social Housing Regulation Act 2023 and meets the four consumer standards that underpin the legislation.	Continue engagement with regulator in relation to meeting the consumer standards and collate evidence to demonstrate compliance Improvement plans are delivered on schedule for each of the four consumer standards (including Creating Great Homes Together, Housing (Safety & Quality) and Consumer Standards)	1.1 Improve the quality of council homes and estates	Improve housing quality, safety and sustainability	Director Housing People Services & Director Homes and Investment
HS02	Provide a repairs and maintenance service for council owned housing	Reduce backlog of housing repairs Remodel the existing contractor framework by December 2026. Realise Strategic Management Plan to fully meet electrical safety compliance by December 2026. Launch a repairs and maintenance policy co-produced with tenants by September 2026 Undertake incoming and lateral mains testing to all low, medium and high rise buildings. Complete lateral mains replacement and upgrade in six blocks.	1.1 Improve the quality of council homes and estates	Improve housing quality, safety and sustainability	Head of Housing Repairs & Maintenance
HS03	Invest in building and fire safety to meet duties under the Building Safety Act and Fire Safety (England) Regulations and ensure we are compliant with Health & Safety.	Deliver action plans aligned to key priority actions in the Housing Health & Safety Action Plan 2026/27 for gas, electric, water, asbestos, lifts, and fire risk by March 2027. Fully meet requirements of Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 for tenants who may not be able to evacuate on their own. Design and deliver capital programme for water safety in 2026/27	1.2 Prioritise building and fire safety improvements	Improve housing quality, safety and sustainability	Head of Housing Safety & Regulatory Compliance
HS04	Deliver planned and major works capital programmes	Agree Asset Management Plan 2026/27 Cabinet (May 2026) Deliver 2026/27 Asset Management Plan Deliver Year 1 of stock condition survey programme Complete major and planned works as per delivery schedule	1.2 Prioritise building and fire safety improvements	Improve housing quality, safety and sustainability	Head of Housing Investment & Asset Management

HS05	Improve the condition of private rented sector accommodation	Agree new Private Sector Housing Enforcement Policy (April 2026) Implement phase 1 requirements of Renters Rights Act (May 2026) and preparation for phase 2 requirements Publish interim review of existing Selective Licensing Scheme (June 2026) Roll out of selective licensing scheme to further wards in 2026/27 (October 2026) Undertake fire remediation actions - by identification of medium and high rise (11-18m) private sector blocks with potentially unsafe cladding and link through to the government's Cladding Safety Scheme	1.3 Improve standards in the private rented sector	Improve housing quality, safety and sustainability	Head of Housing Strategy & Supply
HS06	Improve the energy performance of homes	Complete current PV programme for council owned homes Complete decarbonisation of Manor Paddock Seniors Housing Scheme Delivery of year 2 of Warm Homes Social Housing Fund project - 40 homes to be retrofitted to minimum EPC C. Complete mobilisation of collective solar purchasing scheme across Sussex providing low carbon technologies to private households and complete round 1 of scheme.	1.3 Improve standards in the private rented sector	Improve housing quality, safety and sustainability	Head of Housing Investment & Asset Management
HS07	Progress workstreams on future options for the three master planning areas (St James House, Nettleton Court, Dudeney Lodge, Swallow Court, Falcon Court, Heron Court, Kestrel Court and Kingfisher Court)	Procure with residents an Independent Tenant & Leaseholder Advisor (ITLA) to support residents through rehousing and design development stages, Identify delivery routes for each masterplan area following design and financial due diligence Co-design with residents the communications, engagement and involvement charter	1.1 Improve the quality of council homes and estates 5.1 Listen and engage with our residents	Improve housing quality, safety and sustainability	Director of Estates Renewal
Priority 2. Deliver the homes our city needs					
HS08	Accelerate place-based engagement and evidence mobilisation to shape the new Brighton & Hove City Plan	Issuing and publication of the 'Notice of intention to commence local plan preparation Undertake Scoping Consultation. Consultation on proposed local plan content and evidence	2.1 Increase the supply of high-quality homes that meet the needs of our communities	Increase housing supply	Head of Planning

HS09	Reduce the number of private sector long-term empty homes in the city	Bring 100 long term empty homes (1 years plus) back into use by March 27. Review options for using the Social & Affordable Homes Programme funding to bring empty properties into use for affordable housing.	2.1 Increase the supply of high-quality homes that meet the needs of our communities	Increase housing supply	Head of Housing Strategy & Supply Head of Temporary & Supported Housing
HS10	Increase supply of affordable homes - rented and low cost ownership	159 additional council homes delivered by the council (new build, acquisitions & conversions) by March 2027 Deliver Year 1 of the Local Authority Housing Fund (phase 4) programme Deliver Year 1 of the TA Supply Strategy Review existing council assets to establish the best opportunities for developing more affordable homes Future sites secured through Homes for Brighton & Hove to achieve 1,000 new homes over the lifetime of the project New build delivery programme in 26/27 - completion at Frederick Street (4 homes), Former Hollingbury Library site (9 homes), other small sites (16).	2.2 Increase the supply of affordable homes	Increase housing supply	Head of Housing Strategy & Supply Head of Place Making
HS11	Create new social housing lets by reducing under occupancy and increasing options for home ownership.	Develop downsizing strategy Home Ownership Grant pilot 2026/27 for 8 blocks in master planning areas.	2.2 Increase the supply of affordable homes	Increase housing supply	Head of Tenancy Services
HS12	Reduce the number of short-term lets and second homes in the city.	Prepare for potential changes in legislation in relation to short term lets. Review impact of 100% council tax charge on 2nd home ownership (March 27)	2.2 Increase the supply of affordable homes	Increase housing supply	Head of Housing Strategy & Supply Head of Planning Head of Welfare, Revenues & Business Support
Priority 3. Prevent homelessness and meet housing need					
HS13	Reduce the number of households in temporary accommodation	Deliver actions within the Temporary Accommodation Reduction Action Plan Deliver Year 1 TA Supply Strategy Work with Registered Providers to develop an Exempt Supported TA model	3.2 Reduce the number of households in temporary accommodation	Improve housing support for residents	Head of Temporary & Supported Accommodation/ Head of Housing Strategy & Supply

HS14	Improve the quality of temporary accommodation	Implement the Dynamic Market for temporary accommodation to increase the supply and quality of accommodation. Reduce the unit cost of temporary accommodation, including reducing reliance on high-cost nightly paid accommodation and improving value for money through the Dynamic Market and supply strategy. Undertake a pilot scheme providing grants to private landlords to improve energy efficiency of their homes. Compliance standards will be defined within Dynamic Market specification to ensure providers are aligned with national policy and also there will be a trauma informed approach requirement to Housing Management standards in these arrangement.	5.3 Deliver effective, high quality housing services	Improve housing quality, safety and sustainability	Head of Temporary & Supported Accommodation
HS15	Deliver Homelessness and Rough Sleeping Strategy	Include MHCLG local plan actions in strategy action plan - due for publication September 2026 Establish Homelessness & Rough Sleeping Partnership Board June 2026 Implementation underway with work on key deliverables captured under HS16, HS17, HS19, HS20 & HS21	3.3 Focus our assistance on people who need most help	Improve housing support for residents	Head of Homelessness & Housing Options
HS16	Commission Single Homeless Services (Street Outreach, Housing First)	Housing First and Street Outreach Services to be repocured in 2027	3.3 Focus our assistance on people who need most help	Improve housing support for residents	Head of Temporary & Supported Accommodation
HS17	Develop joined up approaches for those most at risk of harm or where there is greater impact if they become homeless	Increase our co-location with external services, following data review of areas to be targeted by end of 2026 Develop a risk assessment and first stage of a no first night out model for those at risk of experiencing rough sleeping by summer 2027.	3.3 Focus our assistance on people who need most help	Improve housing support for residents	Head of Temporary & Supported Accommodation Director - Commissioning & Communities
HS18	Support and resettle refugees and asylum seekers	Deliver our commitments as a City of Sanctuary Support the Refugee Resettlement Programmes including identifying suitable properties in the private rented sector Other properties to be acquired through the Local Authority Housing Fund in 2026/27	5.2 Ensure our housing services are accessible, fair and inclusive	Work to reduce inequality	Head of Housing Strategy & Supply Director - Commissioning & Communities
Priority 4. Support improved health and wellbeing for all					

HS19	Ensure that people can live in safe and well-maintained neighbourhoods and feel safe in their homes	Complete review of Estate Development Budget and maximise opportunities for social value to support the scheme Deliver safer communities improvement projects including improving awareness of reporting routes and escalation, provision of consistent advice and staff training and, introduce community commitments that support positive behaviours. Implement Neighbourhood Health Model Agree Vulnerability Policy Improve the look and feel of council estates by working in partnership with teams across the council to bring forward improvements.	4.1 Work with partners to develop safe, healthy and inclusive estates and neighbourhoods	Create safe public spaces that are accessible for all	Head of Tenancy Services
HS20	Support older people to be independent and resilient	Complete Seniors Housing Review to strengthen the value of the service for residents, building upon what's worked well, especially in terms of preventative and wellbeing work	4.2 Support people to live independently	A healthy city where people thrive.	Programme Director Integrated Service Transformation Head of Tenancy Services
HS21	Support people with additional support needs to be independent and resilient.	Deliver the elements of the learning disability strategy housing action plan, autism action plan and mental health action plan where resources have been committed by partners and seek further resources where these are not available.	4.2 Support people to live independently	Improve housing support for residents	Director - Commissioning & Partnerships Head of Place Making Head of Disability Services 25+ Head of Children's Disability Services Programme Director
HS22	Meet requirements of Supported Housing (Regulatory) Oversight Act 2023.	Complete provider mapping and stakeholder engagement including call for evidence Complete a needs assessment of supported housing provision for the city (December 2026) Deliver new Supported Housing Strategy (March 2027) Prepare for anticipated introduction of mandatory licensing for supported housing (date TBC by MHCLG)	4.2 Support people to live independently	Improve housing support for residents	Head of Temporary & Supported Accommodation Head of Housing Strategy & Supply. Head of Welfare, Revenues and Business Support
HS23	Enable people to live independently in their homes by providing housing adaptations	Provide and deliver adaptations for those in need - £4.8m of investment in 2026/27 (£1.83m for council owned homes and £2.97m for privately owned homes through Disabled Facilities Grant).	4.2 Support people to live independently	Improve housing support for residents	Head of Service (Access) Adult Social Care)

HS24	Meet requirements of Awaab's Law Phase 2	Prepare for phase two of Awaab's Law which will make response times legally enforceable for a wider range of serious housing hazards, including excess cold and heat, fall risks, structural safety issues, fire and electrical hazards, and hygiene or sanitation problems (expected October 2026)	4.3 Promote healthy housing for our residents	Improve housing quality, safety and sustainability Enable people to live healthy, happy and fulfilling lives	Head of Housing Repairs & Maintenance Head of Investment & Asset Management
Priority 5: Provide resident focused housing services					
HS25	Ensure that tenants' views are at the heart of decision-making about the delivery of our landlord services.	Deliver Year 2 of the Transforming Tenant Engagement Action Plan 2025-27. Establish working group to oversee progress. Produce Tenant Engagement Strategy Create a resident scrutiny panel for the repairs service Provide a training programme for tenants so they can take part with confidence	5.1 Listen to and engage with our residents	Meet the needs of our residents and other customers	Director Housing People Services Director - Commissioning & Communities
HS26	Brighton & Hove City Council to become a great landlord	Deliver Year 1 of 'Creating Great Homes Together - Continuous Improvement Plan' by March 2027 Strengthen approach to complaints handling by March 2027	5.1 Listen to and engage with our residents 5.3 Deliver effective, high quality housing services	Meet the needs of our residents and other customers	Director Housing People Services & Director Homes and Investment
HS27	Provide housing information and advice appropriate to the needs of our diverse communities	Review the customer journey and information on housing services webpages as part of council wide website refresh Explore alternative digital tools for engaging with customers	5.2 Ensure our housing services are accessible, fair and inclusive	Meet the needs of our residents and other customers	Director Homes and Investment Director Housing People Services Strategic
HS28	Ensure that our housing workforce has the relevant skills and competencies to deliver an effective service to all residents.	Meet requirements of Regulator of Social Housing conduct and competence requirements for staff including agreeing a learning and development policy, professional standards and commencing a programme of mandatory qualifications for relevant staff (October 2026)	5.3 Deliver effective, high quality housing services	Improve housing support for residents Our ways of working	Director Homes and Investment Director Housing People Services
HS29	Work with other social landlords to share intelligence, pool resources and work on shared priorities.	Supported Housing Strategy - stakeholder event (June 2026) Partnership work with Registered Provider's to review options for exempt accommodation model for RP Brickfields housing scheme - enter into a 125-year lease with Southdown (Registered Provider) to manage and act as the landlord. Consult with Registered Providers on a new Tenancy Strategy (September 2026)	5.4 Work with our partners to agree and deliver shared priorities	Improve housing quality, safety and sustainability Increase housing supply Improve housing support for residents	Head of Housing Strategy and Supply Head of Commissioning (ASC)

HS30	Work with NHS and other partners to improve services and support for people with multiple, compound needs	Homeless & Multiple Compound Needs ICT to support delivery of priority 3 of the new homeless & rough sleeping strategy, providing joined up services for those most in need Test a new model of Integrated health & care in reach support into New Stiene Mews hostel Complete annual multiple needs audit to understand prevalence of MCNs within city's homeless population	5.4 Work with our partners to agree and deliver shared priorities	Improve housing support for residents	Programme Director - Integrated Service Transformation
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Appendix 2 Review of Housing Strategy Equalities Impact Assessment

Recommendation	Achievements by end of year 2
Recommendation 1: In Progress The collection and analysis of equality data by housing services should be reviewed and, where required, improved. This included reviewing the systems used to collect and analyse equalities data. The Year 2 (2025/26) action plan for the strategy should contain an explicit action to ensure that this is addressed.	The council's Equalities Data Standards were used to frame equality monitoring questions for the Homelessness and Rough Sleeping Strategy consultation exercise in autumn 2025 and the Hate Incident Policy consultation in autumn 2024. Resources have been allocated to carry out an EIA for Tenancy Services in order to assess the gaps that the service has in delivering considering all the council tenants needs.

Recommendation	Achievements by end of year 2
Recommendation 2: In Progress In implementing the strategy, and in planning and delivering housing and support services, particular consideration should be given to impacts on: - older adults - children, young people and their families - disabled people with additional focus on disabled children and young adults and disabled people 65+ (Y1 action plan actions are identified in the relevant section) - people from Black and racially minoritised groups including gypsies, Roma and travellers - Gender Identity and Sex Gender Reassignment - LGBT+ people - Pregnant people - Current and former armed forces personnel - Refugees and asylum-seeking children - Domestic and/or Sexual Abuse and Violence Survivors and people in vulnerable situations Specific issues, considerations and key intersections are identified in the relevant sections	Issues relating to these protected characteristics and their intersection with homelessness and rough sleeping are captured and acknowledged in the Review of Homelessness 2025 and in a more detailed Equality Impact Assessment (EIA) for the Homelessness and Rough Sleeping Strategy. These insights have been used as inputs to ensure that considerations are included in the delivery of services. A review of the Private Sector Housing Enforcement Policy, based on the Renters' Rights Act (2025), is has been completed in order for enforcement actions to be updated. These actions are intended to create a fairer and more inclusive rental market by reducing inequalities and promoting housing security. Greater predictability in rent levels, stronger protections against eviction, and improved housing standards are expected to lead to direct positive improvements in health, safety and wellbeing across populations with different protected characteristics. More generally, the Housing Allocation Policy, the Homelessness and Rough Sleeping Strategy, the Hate Incident Policy and this Housing Strategy have been developed through the lens of the Equality Act (2010). This approach has been taken to ensure that clear guidelines are in place for the delivery of housing services, taking into account the specific needs of people with all protected characteristics and vulnerable groups. Examples of actions that have been implemented include the following: • Initiatives such as the Multiple Compound Needs Integrated Community Team Model, women-only accommodation, and the Afghan Resettlement Programme are being delivered to provide services tailored to people experiencing intersectional disadvantages across different protected characteristics (see further details in updates for Recommendations 8 and 9). • Older adults: Ongoing communication and engagement with tenants living in Seniors Housing regarding their wellbeing, tenancy, support needs and engagement actions have been maintained through annual reviews (93% of residents), quarterly scheme manager meetings (696 residents), and regular verbal contact (over 4,000 recorded entries). A total of 608 referrals have been made to partner services, primarily health-related, to support residents in living independently. Health, wellbeing and social connectivity activities have been delivered with a range of partners, including Volunteering Matters (Lifelines projects such as knitting, Mah Jong, art sessions and digital support), the Trust for Developing Communities - TDC, Volunteering Matters and local health services (Health and wellbeing events), and Bridging Change (community groups for Black and racially minoritised communities). Creative and therapeutic activities have also been delivered by Fabrica (arts sessions), Music for Connection (music sessions) and Pegasus Puppetry (puppetry workshops), supporting residents living with dementia.

Recommendation	Achievements by end of year 2
	• Children, young people and their families: The provision of affordable rented housing at social rent or Local Housing Allowance (LHA)-capped rent levels has been prioritised over low-cost home ownership schemes. This approach is expected to improve household income for families with children and young people. In addition, the mix of house types has been adjusted to increase the proportion of three- and four-bedroom homes available for affordable rent, supporting reductions in long waiting times on the housing register for larger family accommodation and enabling families to remain within the city rather than relocate to more affordable neighbouring towns. Across the city, the provision or enabling of 177 two-bedroom homes, 68 three-bedroom homes, 16 four-bedroom homes and one five-bedroom home has been achieved, all of which are affordable, safe and secure homes for children, young people and their families. Work has also continued on the development of a 29-unit scheme of transitional supported housing for young people, designed as a stepping stone towards independent adult living. • Disabled people, with additional focus on disabled children and young adults, and disabled people aged 65+: ○ To support residents in remaining in their own homes for as long as possible, major adaptations have been delivered through Disabled Facilities Grants (171 in 2024/25 and 131 in 2025/26) and in council homes (232 in 2024/25 and 347 in 2025/26) ○ A training video for repairs operatives on supporting tenants with autism has been developed to strengthen understanding across the service and to ensure that repairs are delivered inclusively and responsively. ○ To support delivery of the Council's Adult Learning Disability Strategy, a Housing and Support working group has been established. A Housing and Support tile has been added to the Easy Read Hub website to provide more accessible information. A new approved provider list for supported living and community support has been implemented, and an adult learning disability brokerage function has been established. In addition, the Sussex Positive Behaviour Support (PBS) Network has been engaged to support the development of a new service focused on hospital discharge.

Recommendation	Achievements by end of year 2
	• People from Black and racially minoritised groups, including Gypsies, Roma and Travellers: Specific considerations for people with these protected characteristics are included within the Housing Allocation Policy and the Homelessness and Rough Sleeping Strategy (see further details in the updates for Recommendations 3, 4 and 5). • LGBTQ+ people: An LGBTQ+ Housing Pledge has been established, through which LGBTQ+ resident input at executive and strategic levels is being enabled, LGBTQ+ visibility is being increased in the organisation, and specific LGBTQ+ training is to be provided to staff. • Pregnant people: Additional actions to be considered. • Current and former armed forces personnel: A Community Covenant is in place, representing a pledge of mutual support between the civilian community and the local armed forces community. Through this covenant, local community support for armed forces personnel is encouraged, public understanding of issues affecting the armed forces community is promoted, and efforts are made to ensure that serving personnel, veterans and their families are not disadvantaged as a result of service. In addition, the Allocations Policy implemented in 2025 amended priority to current or former armed forces personnel. • Refugees and asylum-seeking children: Support is being provided through the Afghan Resettlement Programme (see further details in the updates for Recommendation 9). • Survivors of domestic and/or sexual abuse and violence, and people in vulnerable situations: The Violence Against Women and Girls, Domestic Abuse and Sexual Violence Strategy 2025–28 was launched in January 2025. This strategy includes the provision of a range of support services and accommodation options, including women-only accommodation (see further details in the updates for Recommendation 9).

Recommendation	Achievements by end of year 2
Recommendation 3: In Progress That the housing needs of the city's Black and racially minoritised groups (including Gypsy, Roma and Travellers) are assessed in year 2 of the strategy action plan and plans put in place to address any negative disproportionate impacts identified.	Housing needs assessments: Brighton & Hove has joined other councils in Sussex to commission a review of supported housing. The specification mirrors national guidance on conducting a review. Further work is ongoing on local data to identify issues affecting Black and racially minoritised groups, for example, analysis of evictions from supported housing by protected characteristic. Actions in place: The Housing Allocation Policy, signed off in 2025, was drafted with reference to the Equality Act 2010 and the council's Public Sector Equality Duty. The Council has adopted the Commission for Racial Equality's Statutory Code of Practice on Racial Equality in Housing and the statutory guidance Improving Access to Social Housing for Victims of Domestic Abuse. Close work with agencies and supported housing providers has been carried out to help customers access this scheme and ensure that information meets the needs of people with a disability, sensory impairment, or language needs. The Homelessness and Rough Sleeping Strategy includes Priority 3 - Improve joined-up support with our partners for people who most need help, which considers the specific needs to deliver services to people fleeing from domestic violence, vulnerable families, refugees and asylum seekers, LGBTQ+ youth, people with mental health needs, neurodivergent people and others with multiple, compounded needs, and people experiencing rough sleeping.
Recommendation 4: In Progress When future housing needs assessments are commissioned, consideration of ethnicity, 'Race', ethnic heritage and its intersections should be included in the specification	The review of Homelessness in Brighton & Hove 2025 identified over-representation of Black and racially minoritised groups in temporary accommodation. The Pan Sussex Supported Housing Needs Assessment to be carried out this year will identify the demographic characteristics of people using supported housing. Findings from this assessment will then be considered in the strategy development for the different pathways - older people's, transitional & long term.
Recommendation 5: Complete That Black and racially minoritised groups are explicitly considered in the development of the new homelessness and rough sleeping strategy, identified as action HS17	The Homelessness and Rough Sleeping Strategy 2025-2030 includes action to work with community, voluntary and faith organisations to develop targeted, culturally appropriate information and advice for people from Black and Racially Minoritised communities, including people seeking asylum and refugees, so they can access the support they need.

Recommendation	Achievements by end of year 2
in the Year 1 action plan for the housing strategy.	
Recommendation 6: Complete The findings of this equality impact assessment and the data and needs assessments that have informed it are incorporated into the needs assessment for the new homelessness and rough sleeping strategy (HS17 in Y1 action plan).	The EIA for the housing strategy was a source of evidence for the Review of Homelessness in Brighton & Hove 2025. Equality data was updated to inform the review, and a separate EIA was published with the Homelessness and Rough Sleeping Strategy.
Recommendation 7: In Progress Use the development of a new homelessness and rough sleeping strategy to review and strengthen partnership arrangements for tackling homelessness in the city (HS17 and HS35 in the Y1 action plan).	Working with partners is deemed as a key factor for the Homelessness and Rough Sleeping Strategy, being integrated in its objectives as well as in the way of delivering it. Governance and partnership arrangements for tackling homelessness are being taken forward with a new Homelessness and Rough Sleeping Partnership Board overseeing the work.
Recommendation 8: Complete That the needs of people with multiple, compound needs are explicitly considered in the implementation of the strategy, with a particular emphasis on Priority 3: Prevent homelessness and meet housing need. This is identified as action HS34 in the Y1 action plan.	Actions to address homelessness and multiple compound needs are identified under Priority 3 of the Homelessness and Rough Sleeping Strategy 2025 to 2030. They include the establishment of a Homelessness and Multiple Compound Needs (MCN) partnership, embedding coproduction and lived experience into service design, and taking forward plans for a homeless healthcare hub. An MCN Integrated Community Team model has been set up by integrating the homeless, rough sleeping and homeless healthcare services through the Multiple Compound Needs Partnership. The team has recently completed a detailed assessment of MCN prevalence and needs and agreed on key priorities of establishing an MCN hostel in the city, reducing the number of preventable A&E attendances related to MCN, and increasing the number of people supported through its multi-disciplinary team from 100-200 a year.

Recommendation	Achievements by end of year 2
Recommendation 9: In Progress That risk of exploitation and harm is explicitly considered in the implementation of the strategy and in the development of services for people at higher risk due to specific or intersecting characteristics.	The Homelessness and Rough Sleeping Strategy commits to target support for the most vulnerable people, including ensuring multi-agency protocols are in place for young people leaving care, 16- and 17-year-olds, pregnant people, families with children, survivors of domestic abuse, refugees and asylum seekers, and LGBTQ+ people. Multi-agency guidance issued by the Safeguarding Adults Board for vulnerable individuals with care and support needs, including Multiple Compound Needs moving across local authority areas. Women-only accommodation has been made available through council-owned and interim and commissioned arrangements to ensure women have access to safe and appropriate temporary accommodation at different points in the housing journey. Additional accommodation for Afghan refugees has been made available with the support of the Local Authority Housing Fund (LAHF) 3, where all properties acquired are now occupied. Successfully bid for 9.2m funding for LAHF 4 to provide for the other 46 properties over the next 4 years for TA and resettlement use. In total, we have resettled 51 households (238 individuals) of the Afghan resettlement programmes from the start of the programme until the end of March 2026. project. The programme includes intensive casework, English language and employability support delivered by Voices in Exile, alongside holistic, regular caseworker engagement with families during their first two years. This provides a high level of protection from exploitation and harm and an early warning of safeguarding concerns such as domestic abuse. Where domestic abuse does occur, Voices in Exile continues to support survivors (and sometimes perpetrators), alongside a multi-agency response. An expression of interest has been submitted to be considered for an asylum seekers accommodation pilot.

Recommendation	Achievements by end of year 2
Recommendation 10: In Progress Ensure that the recommendations in this EIA are reflected in the action plan to deliver the Social Housing Regulator’s Transparency, Influence and Accountability Consumer Standard.	The Vulnerability and Reasonable Adjustments Policy is drafted and aiming to be agreed by Cabinet in December 2026. Once the policy is signed off, there will be a co-production process to write the strategy for delivery, which will establish how the Council will align the policy with lived experience. The policy and strategy promote fair and equitable outcomes by embedding respect, accessibility, and a person-centred, trauma-informed approach that ensures tenants are listened to and supported with dignity. They use data and equality analysis to meet diverse needs, offering a wide range of adjustments and communication options to reduce barriers. Clear communication, transparent decision-making, and accessible complaints processes strengthen accountability, while tenant feedback—captured through Tenant Satisfaction Measures and surveys—and co-production with residents drive continuous improvement and ensure services reflect lived experience. The Creating Great Homes Together Action Plan includes an action that aims to strengthen tenant influence and involvement in shaping housing services. As part of its scope, it looks for the tenants' engagement to be diverse, inclusive, modern, and accessible.

Brighton & Hove City Council

People Overview & Scrutiny

Agenda Item 12

Subject: Scrutiny of SEND Sufficiency

Date of meeting: 14th July 2026

Report of: Chair of People Overview & Scrutiny Committee

Contact Officer: Name: Luke Proudfoot
Email: luke.proudfoot@brighton-hove.gov.uk

Ward(s) affected: All

Key Decision: No

For general release

1. Purpose of the report and policy context

- 1.1 The Special Educational Needs and Disabilities (SEND) Sufficiency Plan 2026-2029 report to cabinet at Appendix 1 sets out Brighton & Hove City Council's planning for the provision of SEND educational places across the city.
- 1.2 The report is presented to People Overview & Scrutiny Committee ahead of a cabinet decision on 16th July 2026.

2. Recommendations

- 2.1 People Overview & Scrutiny Committee notes the Special Educational Needs and Disabilities (SEND) Sufficiency Plan 2026-2029 Report.
- 2.2 People Overview & Scrutiny to provide comments to cabinet on the Special Educational Needs and Disabilities (SEND) Sufficiency Plan 2026-2029 Report to cabinet.

3. Context and background information

- 3.1 Brighton & Hove City Council has a statutory duty to ensure there are enough of the right educational places to appropriately meet the needs of children and young people with Special Educational Needs and Disabilities (SEND).
- 3.2 Brighton & Hove City Council has therefore developed the Special Educational Needs and Disabilities (SEND) Sufficiency Plan 2026-2029 to ensure that children and young people with SEND have access to the right provision, in the right place, at the right time. This includes estimating future needs, identifying gaps, and setting out plans to create more specialist and inclusive provision across the city.

- 3.3 The Special Educational Needs and Disabilities (SEND) Sufficiency Plan 2026-2029 is due at cabinet on 16th July 2026 and members of People Overview & Scrutiny may wish to provide comments on the plan to cabinet.
- 3.4 Draft minutes of the meeting will be shared with cabinet members ahead of the cabinet meeting.

4. Analysis and consideration of alternative options

- 4.1 None for this scrutiny report.
- 4.2 An option of not bringing forward a SEND Sufficiency Plan has been considered and rejected. SEND sufficiency was identified as one of six key priorities in the SEND Strategy 2021–2026, and a dedicated plan is now required to guide the next three years of development and delivery. Without a published Plan, the Council would be unable to demonstrate a coherent strategic approach to discharging its statutory duty, and the prioritisation and sequencing of individual provision proposals would not be transparent to families, schools or partners.
- 4.3 An option of relying on placements in independent and non-maintained special schools, and in other local authority-maintained provision, to meet projected demand has been considered and rejected. The total cost of out-of-city placements has risen by approximately £1 million over the last three years, and the Council's High Needs Block (HNB) cannot sustain a continued shift towards higher-cost provision. The provision set out in the draft Plan is intended to enable more children and young people to be educated as close to home as possible, in line with the SEND Code of Practice and the Principles of Belonging, while making more effective use of the HNB.
- 4.4 An option of pausing the development of the draft Plan until there is greater certainty over the outcome of the Schools White Paper and the SEND Reform consultation has been considered and rejected. The direction of national policy is clear and consistent; the local demand pressures are immediate and continuing to grow, and the lead times for new resource bases and specialist provision are significant. A pause would risk the city falling behind the national reform trajectory and continuing to rely on higher-cost out-of-area placements. The draft Plan has been designed to align with the direction of reform without pre-empting its detail, and to remain sufficiently flexible to be refined as the national picture develops.

5. Community engagement and consultation

- 5.1 None for this scrutiny report.
- 5.2 The draft Plan has been developed through the SEN Sufficiency Workstream, which was revised in January 2025 in line with the Education and Learning Directorate's workstream agreements with schools. The workstream comprises school and provision leaders, Council officers and a

representative from the Parent Carer Forum, and has supported the development of the draft Plan throughout.

- 5.3 A data refresh was commissioned in January 2025 and further detail has been added from the January 2026 SEN2 DfE data return to ensure that proposed developments are informed by the most recent picture of need, and that the Council is neither under-providing nor over-providing for any type of SEND need.

6. Financial implications

- 6.1 The revenue funding of the proposals is from the high needs block of the council's Dedicated Schools Grant and capital funding will be provided by the high needs capital budget.
- 6.2 Full financial implications are included in the cabinet report at Appendix 1.

Name of finance officer consulted: Steve Williams Date consulted: 24/06/26

7. Legal implications

- 7.1 Under the Children and Families Act 2014, Local Authorities have a statutory duty to identify, assess, and ensure sufficient provision for children with Special Educational Needs and Disabilities ("SEND"). As detailed in paragraph 3.25 of this report, the draft SEND Sufficiency Plan is not itself a statutory document, but it sets out the Council's proposed approach to discharging this statutory duty. The Education and Inspections Act 2006 and the School Organisation (Establishment and Discontinuance of Schools) Regulations 2013, require a number of statutory steps to be taken for some of the proposed individual provisions that underpin the draft plan, including formal public consultation, statutory notice and decision-making by the relevant body. Per paragraph 3.26 of the report to Cabinet the draft Plan is a strategic document that does not, of itself, authorise any alteration to or new provision within existing schools; relevant reports seeking those decisions following the applicable statutory steps will need to be presented separately.

Name of lawyer consulted: Sandra O'Brien Date consulted: 25/06/26

8. Risk implications

- 8.1 None for this scrutiny report.

9. Equalities implications

- 9.1 None for this scrutiny report. Please see Cabinet Report EIA at Appendix 3.
- 9.2 The draft Plan is expected to have a positive equalities impact overall, by enabling more children and young people with SEND to access appropriate provision close to home, by reducing reliance special school and out-of-area placements, and by making explicit the Council's commitments under the Principles of Belonging and the OAIP guidance.

10. Sustainability implications

10.1 None for this scrutiny report.

10.2 By increasing the availability of local specialist base provision, the draft plan is expected to reduce the number of children and young people travelling significant distances to access education, and so to support the Council's wider commitments under the Local Transport Plan and the city's climate change strategy.

10.3 The Council's Home to School Transport Policy prioritises sustainable travel through walking, cycling and public transport where journeys are reasonable and will continue to apply in respect of provision delivered through the draft Plan.

11. Health and Wellbeing Implications:

11.1 None for this scrutiny report.

12. Conclusion

12.1 Members are asked to note the SEND Sufficiency Report and make comments ahead of the report going to cabinet on 16th July 2026.

Supporting Documentation

1. Appendices

1. Special Educational Needs and Disabilities (SEND) Sufficiency Plan 2026-2029 report to cabinet 16th July 2026
2. Draft SEND Sufficiency Plan 2026-2026
3. Equality Impact Assessment
4. SEND Glossary of Acronyms

Brighton & Hove City Council

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Cabinet

Agenda Item

Subject: Special Educational Needs and Disabilities (SEND) Sufficiency Plan 2026-2029

Date of meeting: Thursday, 16 July 2026

Report of: Cabinet Member for Children, Families and Youth Services

Lead Officer: Name: Corporate Director for Families, Children and Wellbeing

Contact Officer: Name: Rhianedd Hughes, Head of SEN Statutory Service

Email: Rhianedd.Hughes@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: Yes

Reason(s) Key: Is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

- 1.1 Cabinet is asked to note the actions set out in the draft Brighton & Hove SEND Sufficiency Plan 2026–2029. The draft Plan sets out the city's ambition for ensuring sufficient and appropriate education places for children and young people with Special Educational Needs and Disabilities (SEND) over the next three years and identifies a programme of new and expanded provision to address known and projected gaps in capacity.
- 1.2 Demand for SEND places in Brighton & Hove has grown significantly over the past decade. In January 2026, 26.1% of pupils in the city (7,787) were identified as having SEND, compared with the national average of 20.8%. The number of children and young people with an Education, Health and Care Plan (EHCP) has risen to 3,193 as of January 2026 and is projected to reach 4,427 by 2032, an increase of 50% from the 2025 baseline. Autism and Social, Emotional and Mental Health (SEMH) needs are the largest and fastest growing categories of need.
- 1.3 Without further action, the Council will not be able to meet its statutory duties under Section 14 of the Education Act 1996 and Section 27 of the Children and Families Act 2014 to provide and keep under review sufficient appropriate school places for children with SEND residing in the local area.

- 1.4 The draft Plan responds to this challenge by setting out a phased programme of new resource bases, expanded targeted support in mainstream schools, and a refocusing of the city's specialist alternative provision.
- 1.5 The draft Plan aligns with Priority 2 (A fair and inclusive city) and Priority 3 (A healthy city where people thrive, and a better future for children and young people) of the Council Plan 2023–2027, and supports the Council's Principles of Belonging and the Ordinarily Available Inclusive Practice (OAIP) guidance launched in March 2026.

2. Recommendations

- 2.1 Cabinet agrees to note the programme of new and expanded specialist provision set out in the latest draft SEND Sufficiency Plan 2026-2029 (attached at Appendix 1).
- 2.2 Cabinet agrees the programme of new and expanded specialist provision set out in the draft SEND Sufficiency Plan 2026–2029 and detailed in Section 3 of the report.
- 2.3 Cabinet notes that individual provisions set out in the draft Plan which require statutory processes — including prescribed alterations under the Education and Inspections Act 2006 — will be subject to separate decisions and public consultation in due course, and that this report does not itself authorise any such alteration.

3. Context and background information

Strategic Context

- 3.1 Brighton & Hove City Council has a statutory duty to ensure sufficient school places for all children resident in the local area, including those with SEND. SEND sufficiency was identified as one of six key priorities in the SEND Strategy 2021–2026 and is a key area in the Local Authority SEND Reform Plan. A dedicated sufficiency plan is now required to guide the next three years of development and delivery.
- 3.2 The draft Plan has been developed in the context of national SEND reforms and the Schools White Paper “Every Child Achieving and Thriving” (2025). National policy is moving towards a more inclusive, locality-based model, with greater emphasis on early intervention, mainstream inclusion, and a graduated response to need. It reflects this direction of travel and is consistent with the Council's Principles of Belonging and the Ordinarily Available Inclusive Practice (OAIP) guidance which was launched in March 2026.
- 3.3 The draft Plan also aligns with Priority 2 (A fair and inclusive city) and Priority 3 (A healthy city where people thrive, and a better future for children and young people) of the Council Plan.

National Policy Context: Schools White Paper and SEND Reform Consultation

- 3.4 The draft plan has been developed in the context of significant national SEND and Alternative Provision (AP) reform. Three documents together shape the direction of travel: the SEND and AP Improvement Plan (2023); the Schools White Paper 'Every Child Achieving and Thriving' (2025); and the parallel SEND Reform

consultation 'Putting Children and Young People First' (2025). The two 2025 documents should be read together: they set out the most substantial redesign of the SEND system in over a decade.

- 3.5 The Schools White Paper and the SEND Reform consultation signal a sustained shift away from large standalone Pupil Referral Units and towards integrated, locality-based alternative provision; towards earlier and more effective inclusion in mainstream supported by a stronger network of specialist resource bases and inclusion units; and towards a national framework for identifying and meeting need. The key reform elements relevant to the Council's sufficiency planning include:
- Specialist Provision Packages – nationally defined, evidence-based support frameworks intended to replace the current individualised provision in EHCPs for children with the most complex needs, with the Council determining whether a package and a continued EHCP is required at phase transition points.
 - Inclusive Mainstream Fund – £1.6 billion over three years allocated to schools, colleges and early years settings to strengthen ordinarily available inclusive practice and early intervention.
 - SEND school groupings – within three years, all schools are expected to join SEND group structures, agree operating principles, and work with the Council and Integrated Care Board to develop a strategic plan for SEND.
 - National Capital investment of £3.7 billion to create new specialist places and inclusion bases nationally, with the Council expected to set out a clear local strategy in order to access funding.
- 3.6 The Council has already submitted its formal response to the SEND Reform consultation. This does not pre-empt the outcome of the consultation; it does, however, seek to position the city well to discharge those duties.
- 3.7 The direction of national policy is clear and consistent, the local demand pressures are immediate, and the lead times for new specialist resource bases, inclusion bases and specialist provision are significant (typically two to three years from approval to opening). Delay would risk the city falling behind the national reform trajectory and having to use higher-cost out-of-area placements. The draft Plan therefore aligns with the direction of national reform without pre-empting its detail and is intended to be sufficiently flexible to be refined as the national picture develops.

Current position and projected demand

- 3.8 As of January 2026, there were 29,847 pupils on roll across Brighton & Hove schools, of whom 1,907 held an EHCP. Brighton & Hove maintained 3,193 EHC Plans for children and young people aged 0–25 resident in the city. SEND prevalence in the city continues to rise: 6.4% of pupils have an EHC plan (compared to the national average of 6.0%) and 19.7% are receiving SEND Support (compared to the national average of 14.8%).
- 3.9 The number of children and young people with autism as a primary need has increased from just under 300 in January 2016 to over 2,400 in January 2026, a rise of around 700% over the decade. Those with SEMH as a primary need have grown from around 1,129 to over 1,816 over the same period, an increase of approximately 60%. Projections to 2032 suggest that the number of 0–25-year-olds with autism as a primary need will rise by a further 81%, and those with SEMH by a further 63%.

- 3.10 Demand for Early Years specialist places have also increased, but the number of Reception transfers to special schools have declined. This reflects a capacity pressure in local specialist provision not a reduction in demand, with the consequence that more children with complex needs are either being educated in mainstream or placed out of area.
- 3.11 Over the last three years, the use of independent and non-maintained special schools have remained broadly stable in volume terms, but the average cost of placements has risen, and the use of other local authority-maintained provision has increased. The total cost of out-of-city placements has risen by from £5.17m in 2022/23 to £5.82m in 2025/2026, an increase of £647k over the last four years.

Programme of new and expanded provision

- 3.12 The draft Plan sets out a programme of new and expanded SEND provision in the city over the period 2026–2029. The key proposals to which this report draws Cabinet's attention are summarised in the table below and described in more detail in the following paragraphs.

Provision	Phase / Type	Places	Planned opening
Stanford Primary School Specialist Base	Primary (KS2) – Autism	12-16	2027/28
Primary Inclusion Intervention Spaces (IIS)	Primary – Targeted Support	80 (additional 10 IISs)	2026/27
Secondary Specialist Base	Secondary – Autism	20	September 2027
Secondary Autism/SEMH Specialist Base	Secondary – Autism/SEMH	20	September 2028
Primary Specialist Support Bases (3)	Primary – Autism/SEMH	36–48	September 2028

Indicative costing summary

- 3.13 The indicative full-year revenue costs of the proposed provision are summarised in the table below and set out in full in the Estimated Costing Table at Appendix 2. The figures are estimates for planning purposes; they represent full-year running costs once each provision is fully operational, with part-year costs applying in the year a provision opens. Costs are met from the High Needs Block of the Dedicated Schools Grant. The formal financial implications are set out in section 6 below.

Provision	Places	Est. annual cost (£000)
Priority 1: Expand neurodiversity provision in mainstream		
Moulsecoomb Primary (The Roost) Specialist Base – Phase 1	8	157
Moulsecoomb Primary Specialist Base – Phase 2	8	157
Stanford Primary Autism Specialist Base	12–16	275
Secondary Autism Specialist Base	20	393

Secondary Autism/SEMH Specialist Base	20	393
Priority 2: Strengthen SEMH provision		
Year 8 SEMH places	12	315
Specialist Year 9 SEMH places	12	315
Priority 3: Develop specialist autism/SEMH provision		
Primary Specialist Bases (3 units)	36–48	704
Priority 4: Strengthen early years & primary specialist provision		
Early years/primary support bases (2 units)	24	471
Priority 5: Address post-16 provision gaps		
Supported internships	20	300
Total estimated annual cost		3,483

Note: figures are indicative planning estimates and will be refined for each provision as scheme design and site confirmation progress, and through its individual statutory process. They exclude the further expansion of Inclusion Intervention Spaces, which is funded separately.

Additional secondary specialist bases

- 3.14 The draft Plan provides two further secondary specialist bases, each with capacity for 20 places. A secondary Autism specialist base is proposed to open in September 2027, and a secondary Autism/SEMH specialist base is proposed to open in September 2028. These provisions will significantly strengthen specialist autism and SEMH capacity at the secondary phase, in direct response to the projected growth in demand set out earlier in this report.

Primary specialist support bases (autism and SEMH)

- 3.15 The draft Plan also provides three new primary specialist support bases for children with autism and SEMH, each offering between 12 and 16 places (36–48 places in total), with a target opening of September 2028. These bases will be established in mainstream primary schools and will include assessment places and outreach to build inclusive practice across the wider primary estate. They are intended to provide a specialist primary offer for children with autism and SEMH closer to home, reducing the use of out-of-area and higher-cost placements.
- 3.16 As with the Autism Resource Units, each of the secondary resource provisions and the three primary specialist support bases will require its own statutory process under the Education and Inspections Act 2006, including formal public consultation, statutory notice and decision-making by the relevant committee, and the sites for individual provisions will be confirmed through those processes.

Inclusion Intervention Spaces (IIS) – further expansion

- 3.17 Inclusion Intervention Spaces (IIS) are a tier 1 targeted support provision developed in primary schools to support children whose needs cannot be fully met through universal classroom provision alone. The IIS pilot launched in 5 primary schools in September 2024, and Phase 2 commenced during 2025/26 with 8 schools.
- 3.18 The draft Plan proposes a further expansion of the IIS programme during 2026/27, with an additional 10 IISs to be commissioned across the primary schools. This will bring forward Tier 1 capacity earlier than originally planned, in response to

continued growth in demand and to support the broader objective of reducing reliance on specialist provision.

Central Hub Brighton (CHB) – leadership transition and provision changes

- 3.19 The Central Hub Brighton (CHB) is the city's specialist alternative provision for children and young people with SEMH needs. The draft Plan reflects the changes underway at CHB to align it with the direction of national SEND and AP reform, which is moving away from large standalone Pupil Referral Units and towards more integrated, locally rooted models in which PRUs and specialist settings provide targeted support within a wider inclusion system.
- 3.20 As part of this work, a new model of leadership will be put into place, to shape the future of the provision in the context of the wider sector change. The model comprises two complementary, fixed-term roles: a Lead Strategic Education Consultant: a serving Headteacher within the city's education and learning community, spanning the both Tier 2 (preventative, outreach and school-based support) and Tier 3 (specialist statutory alternative provision) and a Headteacher who will provide day-to-day operational leadership with responsibility for educational leadership, safeguarding and staff management.
- 3.21 The Treehouse (Primary) provision will continue, with educational support to primary-aged learners delivered from a base at Fairlight Primary School. The Connected Hub (Year 11) will also continue through 2026/2027 with a detailed options appraisal on future arrangements being considered by the Secondary School Partnership.

Statutory and Consultation Framework

- 3.22 The draft SEND Sufficiency Plan is not itself a statutory document, but it sets out the Council's approach to discharging its statutory duty and informs the prioritisation and sequencing of individual provision proposals which will themselves be subject to statutory processes.
- 3.23 The specialist bases proposals set out in the draft Plan will require its own statutory process under the Education and Inspections Act 2006 and the School Organisation (Establishment and Discontinuance of Schools) Regulations 2013, including formal public consultation, statutory notice and decision-making by the relevant committee. Cabinet is asked to note that the draft Plan as a strategic document does not, of itself, authorise any individual prescribed alteration; those decisions will be brought forward separately.

4. Analysis and consideration of alternative options

- 4.1 An option of not bringing forward a SEND Sufficiency Plan has been considered and rejected. SEND sufficiency was identified as one of six key priorities in the SEND Strategy 2021–2026, and a dedicated plan is now required to guide the next three years of development and delivery. Without a published Plan, the Council would be unable to demonstrate a coherent strategic approach to discharging its statutory duty, and the prioritisation and sequencing of individual provision proposals would not be transparent to families, schools or partners.
- 4.2 An option of relying on placements in independent and non-maintained special schools, and in other local authority-maintained provision, to meet projected demand has been considered and rejected. The total cost of out-of-city placements has risen from £5.17m in 2022/23 to £5.82m in 2025/2026, an increase of £647k

despite placement numbers remaining broadly stable. The Council's High Needs Block (HNB) cannot sustain a continued shift towards higher-cost provision. The provision set out in the draft Plan is intended to enable more children and young people to be educated as close to home as possible, in line with the SEND Code of Practice and the Principles of Belonging, while making more effective use of the HNB.

- 4.3 An option of pausing the development of the draft Plan until there is greater certainty over the outcome of the Schools White Paper and the SEND Reform consultation has been considered and rejected. The direction of national policy is clear and consistent; the local demand pressures are immediate and continuing to grow, and the lead times for new resource bases and specialist provision are significant. A pause would risk the city falling behind the national reform trajectory and continuing to rely on higher-cost out-of-area placements. The draft Plan has been designed to align with the direction of reform without pre-empting its detail, and to remain sufficiently flexible to be refined as the national picture develops.

5. Community engagement and consultation

- 5.1 The draft Plan has been developed through the SEN Sufficiency Workstream, which was revised in January 2025 in line with the Education and Learning Directorate's workstream agreements with schools. The workstream comprises of Senior Council Officers, Alternative Provision Leaders, Brighton & Hove Inclusion Support Service, Primary, Secondary and Special School Leaders, Early Years Specialist Nursery, Parent Carer Council (PaCC) who have supported the development of the draft Plan throughout.
- 5.2 A full data refresh has been undertaken to ensure that proposed developments are informed by the most recent picture of need, and that the Council is neither under-providing nor over-providing for any type of SEND need.
- 5.3 Engagement through the SEN Sufficiency Workstream has directly shaped the priorities and sequencing of provision in the draft Plan. Feedback from school and provision leaders informed the prioritisation of secondary autism capacity and primary-phase specialist support, and input from the Parent Carer Council (PaCC) shaped the emphasis on local provision, reduced travel distances and earlier intervention. As active participants in the development of the Plan, Workstream members are committed to its delivery and will continue to be engaged as individual provisions are brought forward.

6. Financial implications

- 6.1 In line with the government's SEN reform plans, the council is planning to significantly increase investment in expanding local mainstream provision.
- 6.2 The details of the programme of planned new provision are provided in section 3.13 of the report with indicative costings shown in 3.14. This has been incorporated into the council's SEND Reform Plan that will be submitted to the government in June. The proposed expansion is over a multi-year period, and the indicative costs shown represent a full annual cost once all new provisions are in place. The total is estimated at £3.483m and will be a cost to the High Needs Block of the Dedicated Schools Grant. For context, the 2026/27 High Needs Block allocation made to Brighton and Hove by government is £43.481m.

- 6.3 Future projections show that the High Needs Block will move into a significant deficit position in 2026/27 (c. £7m in-year deficit) and 2027/28 (c. £11m in-year deficit). In the longer term, the investment in early intervention and mainstream inclusion is expected to reduce the need for more expensive high-cost placements which will mitigate the impact of the planned investment and reduce the size of the deficits.
- 6.4 In February 2026, the Government announced that as part of the wider SEND system reform they will introduce a High Needs Stability Grant in 2026/27. This grant, subject to compliance with certain conditions, is expected to mean that 90% of the council's cumulative high needs deficit as at 31/03/2026 will be funded by the government. The deficit in Brighton and Hove at the end of the 2025/26 financial year was £1.762m. Allocations of the High Needs Stability Grant will only be paid once a local authority has developed and submitted to the Department for Education for a Local SEND reform plan which is then approved as meeting the required criteria. At this stage it is not clear what arrangements Government will put in place for central DSG deficits (primarily high needs related) arising in 2026/27 and 2027/28 but, from 2028/29, assuming compliance with the SEND reforms, the expectation is that any deficits will be managed by central Government.
- 6.5 The capital expenditure for the SEND reform programme is forecasted to spend approximately £8.2m between 2026/27 and 2028/29. This will be funded from the £3.7 billion national investment that the government is making to facilitate the creation of new specialist places and inclusion bases. The Council is expected to set out a clear local strategy in order to access funding.

Name of finance officer consulted: Steve Williams Date consulted: 29/05/26

7. Legal implications

- 7.1 Under the Children and Families Act 2014, Local Authorities have a statutory duty to identify, assess, and ensure sufficient provision for children with Special Educational Needs and Disabilities ("SEND"). As detailed in paragraph 3.25 of this report, the draft SEND Sufficiency Plan is not itself a statutory document, but it sets out the Council's proposed approach to discharging this statutory duty. The Education and Inspections Act 2006 and the School Organisation (Establishment and Discontinuance of Schools) Regulations 2013, require a number of statutory steps to be taken for some of the proposed individual provisions that underpin the draft plan, including formal public consultation, statutory notice and decision-making by the relevant body. Per paragraph 3.26 the draft Plan is a strategic document that does not, of itself, authorise any alteration to or new provision within existing schools; relevant reports seeking those decisions following the applicable statutory steps will need to be presented separately.

Name of lawyer consulted: Sandra O'Brien Date consulted: 17 June 2026

8. Equalities implications

- 8.1 The draft Plan is expected to have a positive equalities impact overall, by enabling more children and young people with SEND to access appropriate provision close to home, by reducing reliance special school and out-of-area placements, and by making explicit the Council's commitments under the Principles of Belonging and the OAIP guidance.

- 8.2 The Council has given particular attention during the consultation to ensure that the views of children and young people with SEND, their families, and those with other protected characteristics are heard. Accessible formats and targeted engagement have been offered, working closely with the Parent Carer Council (PaCC), Amaze, the SEND Youth Forum, and other recognised representative groups.
- 8.3 The full Equalities Impact Assessment (EIA) is attached at Appendix 2. Key findings include: children with autism and SEMH needs, who are disproportionately male, stand to benefit most directly from the proposed new provision.
- 8.4 The EIA also identifies the intersectional disadvantages faced by children with SEND who are also eligible for free school meals, looked after, or from Black, Asian and Minority Ethnic backgrounds, who are more likely to experience delays in identification and assessment, and less likely to access local specialist provision.
- 8.5 The draft Plan's emphasis on early intervention, mainstream inclusion, and local specialist bases is intended to support more equitable access across these groups. The Council will monitor outcomes disaggregated by protected characteristic as provisions open and will report progress through the SEND Local Area Partnership Board

9. Sustainability implications

- 9.1 By increasing the availability of local specialist base provision, the draft plan is expected to reduce the number of children and young people travelling significant distances to access education, and so to support the Council's wider commitments under the Local Transport Plan and the city's climate change strategy.
- 9.2 The Council's Home to School Transport Policy prioritises sustainable travel through walking, cycling and public transport where journeys are reasonable and will continue to apply in respect of provision delivered through the draft Plan.

10. Conclusion

- 10.1 Demand for SEND provision in Brighton & Hove has grown significantly over the past decade and is projected to continue to grow. Without a clear sufficiency plan, the Council will not be able to meet its statutory duty to provide sufficient school places for children with SEND.
- 10.2 At the same time, the Schools White Paper 'Every Child Achieving and Thriving' and the SEND Reform consultation 'Putting Children and Young People First' set out the most substantial redesign of the SEND system in over a decade. While both remain at consultation stage, the direction of travel is clear and the lead times for new specialist bases are significant. The draft Plan has been designed to align with the direction of national reform without pre-empting its detail, and to position the city well to discharge whatever duties emerge as the reforms move into legislation and implementation.

Supporting Documentation

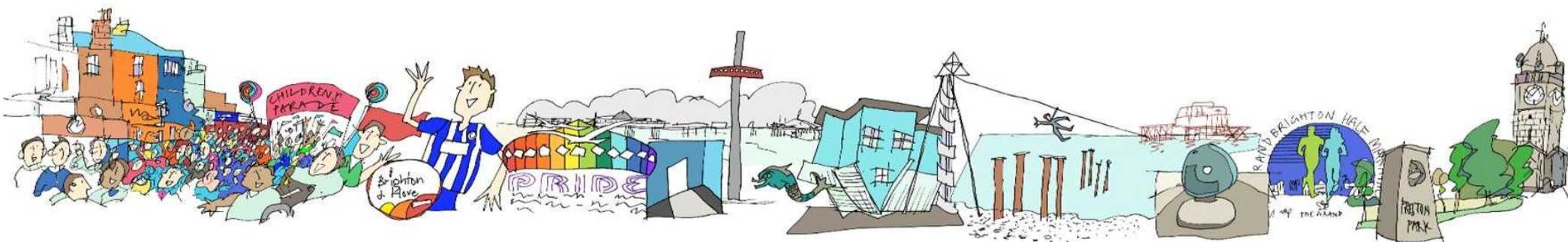
1. Appendices

Appendix 1: Draft SEND Sufficiency Plan 2026-2029

Appendix 2: Equalities Impact Assessment

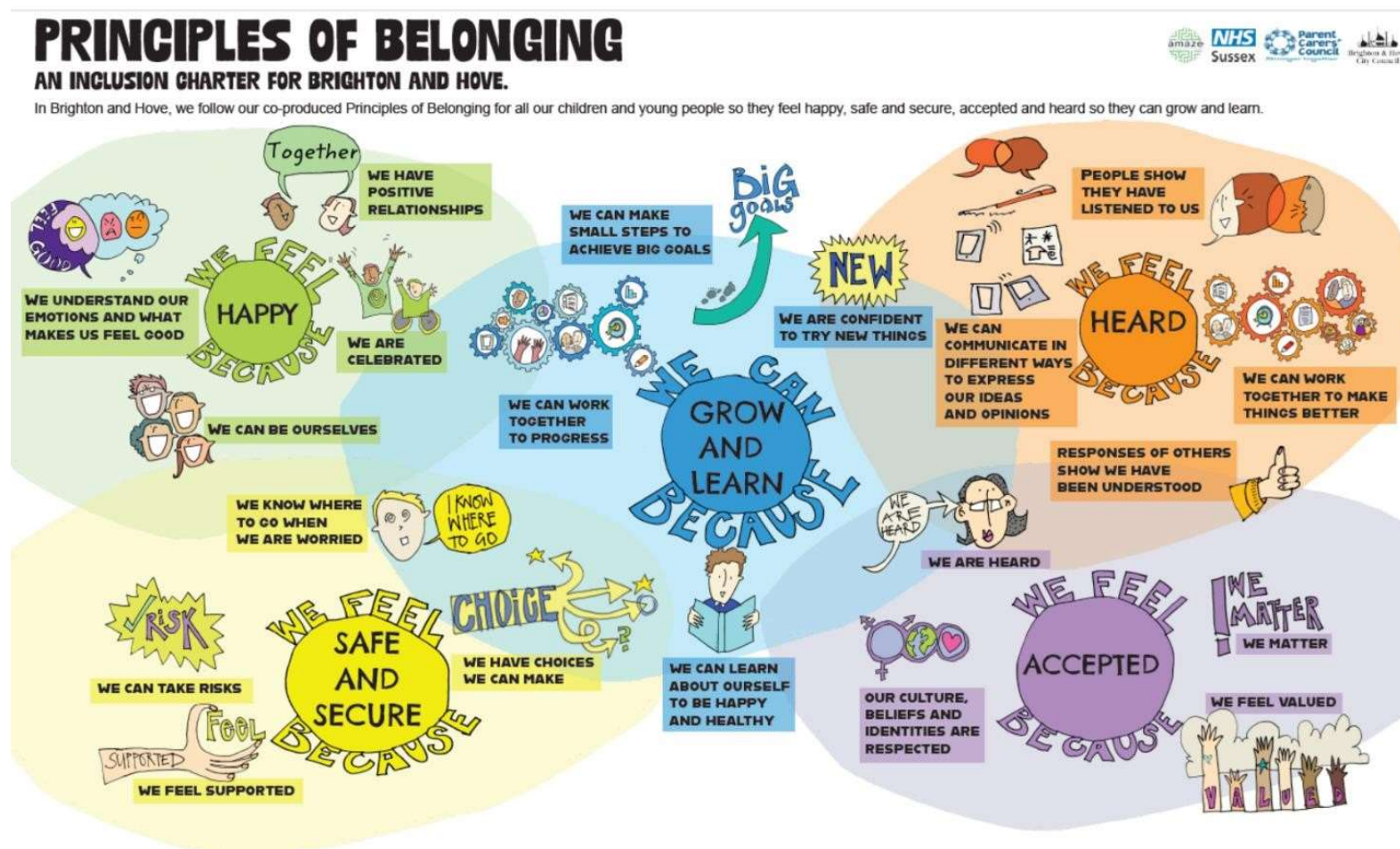
SEND Sufficiency Plan 2026-202G for children and young people with Special Educational Needs and Disabilities (Draft V7.3)

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Introduction

Brighton and Hove aims to be an inclusive city for all children and young people. The Principles of Belonging were developed to support our children as they learn and grow to feel happy, safe, secure, heard and accepted. At the heart of these principles is a culture in which we embrace difference, barriers are minimised or removed, and in which the every-day lived experience, interests and needs of children and young people are better understood. That culture of inclusion in our schools is everybody's responsibility so that children and young people can be educated as close to home as possible and make progress. This plan is about the more specialist educational provision in our city, but it is based on the foundation of supporting children as early as possible to succeed and grow well. You will find reference to the graduated response and how the tiers of support work together to meet our children and young people's needs. For those who do need a more specialised response we want to provide high quality, local provision whenever possible.



This Sufficiency Plan sets out our future placement intentions and will serve as the foundation for ongoing engagement with education providers, children and young people, and their families.

Legal Duty and Strategic Context

Brighton C Hove City Council has a statutory duty under Section 14 of the Education Act 1996 to ensure sufficient school places for all children residing in the local area, including those with Special Educational Needs and Disabilities (SEND).

Over the past decade, demand for SEND places in the city has increased significantly. There is now a clear and pressing need to expand both specialist provision and mainstream resource bases to ensure that children and young people have access to the right type of support — both now and in the future.

SEND sufficiency was identified as one of six key priorities in the SEND Strategy 2021–2026. While progress has been made against several of the strategy’s actions, a dedicated sufficiency plan is now required to guide the next three years of development and delivery.

This plan outlines:

- The current landscape of SEND provision
- Forecasted demand for future places
- Identified gaps in provision
- Current projects and future plans to secure additional capacity

It aligns with Priority 2 (A fair and inclusive city) and Priority 3 (A healthy city where people thrive and a better future for children and young people) of the Council Plan. It supports all the Council’s five organisational pillars but in particular: Innovation and Creativity, and Diversity and Inclusion, as part of our commitment to becoming a learning organisation



The plan will be monitored termly and updated to take account of progress and delivery through the SEND and AP Partnership Board.

Current Position in Brighton & Hove

As of January 2026, there were 29,847 pupils on roll across Brighton & Hove schools, with 1,907 children holding an Education, Health and Care Plan (EHCP). Brighton & Hove maintained 3,193 EHC Plans for children and young people (0-25) resident in the city.

SEND prevalence in the city continues to rise. In January 2026, 26.1% of pupils (7,787) were identified as having SEND which is significantly above the national average of 20.8%. This represents an increase of 524 pupils compared to January 2025, despite an overall decline in the total pupil population.



6.4%

of pupils in Brighton & Hove schools have an EHC plan, which is in line with the national average (6.0%)



19.7%

of Brighton & Hove pupils are receiving SEND Support compared to the national average of 14.8%



100%+

EHCP numbers have increased by over 100% since 2018/19, rising from 1,486 to 3,193 in 2026, with annual growth consistently between 10–13%



5.33%

Statistical neighbour average EHCP plan 5.33% and SEND Support 12.67% as at January 2025

KEY POINTS

- 6.4% of pupils in Brighton & Hove schools have an EHC plan, which is in line with the national average (6.0%)
- 19.7% of Brighton & Hove pupils are receiving SEND Support compared to the national average of 14.8%
- EHCP numbers have increased by over 100% since 2018/19, rising from 1,486 to 3,193 maintained plans in 2026, with annual growth consistently between 10–13%
- Statistical neighbour average EHCP plan 5.33% SEND Support 12.67% as at January 2025

3193

THE NUMBER OF

EHCPs

IN BRIGHTON & HOVE



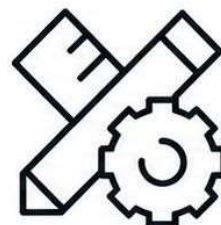
20.2%

PUPILS IN SPECIAL SCHOOLS



3.3%

ATTENDING
RESOURCED
PROVISIONS
AND
SEN UNITS



42.4%
IN MAINSTREAM
SCHOOLS
WITH AN
EHCP

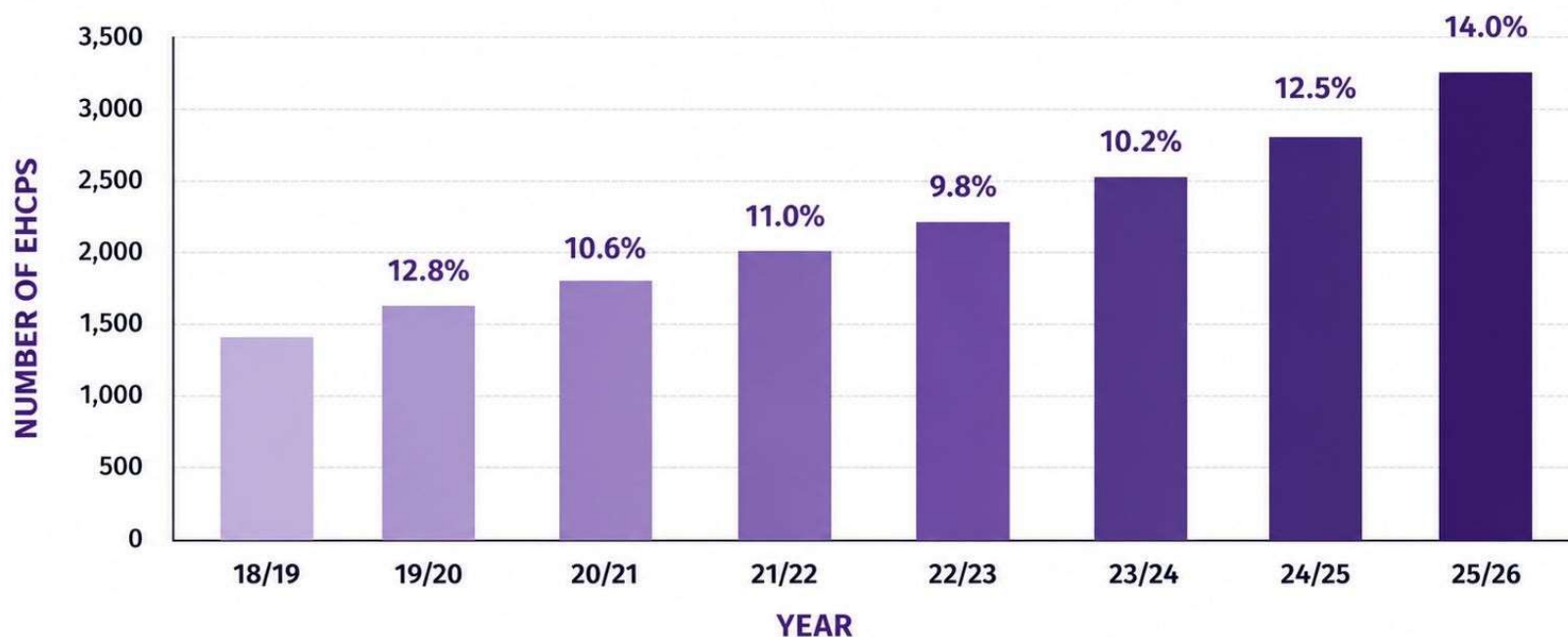


As at SEN2 January 2026 (0-25 pupil population) – This infographic shows the breakdown of EHC plans resident in the city.

Growth in EHC Plans

The city has seen a rise in EHC plans year on year. The graph below is based on the growth in EHC Plans in Brighton and Hove from 18/19 to 25/26 and the annual percentage rise each year. A steady increase in percentage of between 10-13% each year. The growth demonstrates a 57% increase in the last 5 years. In 2025-2026 the percentage increase has risen to 14%.

NUMBER OF EHCP PLANS MAINTAINED BY BRIGHTON & HOVE (0-25)



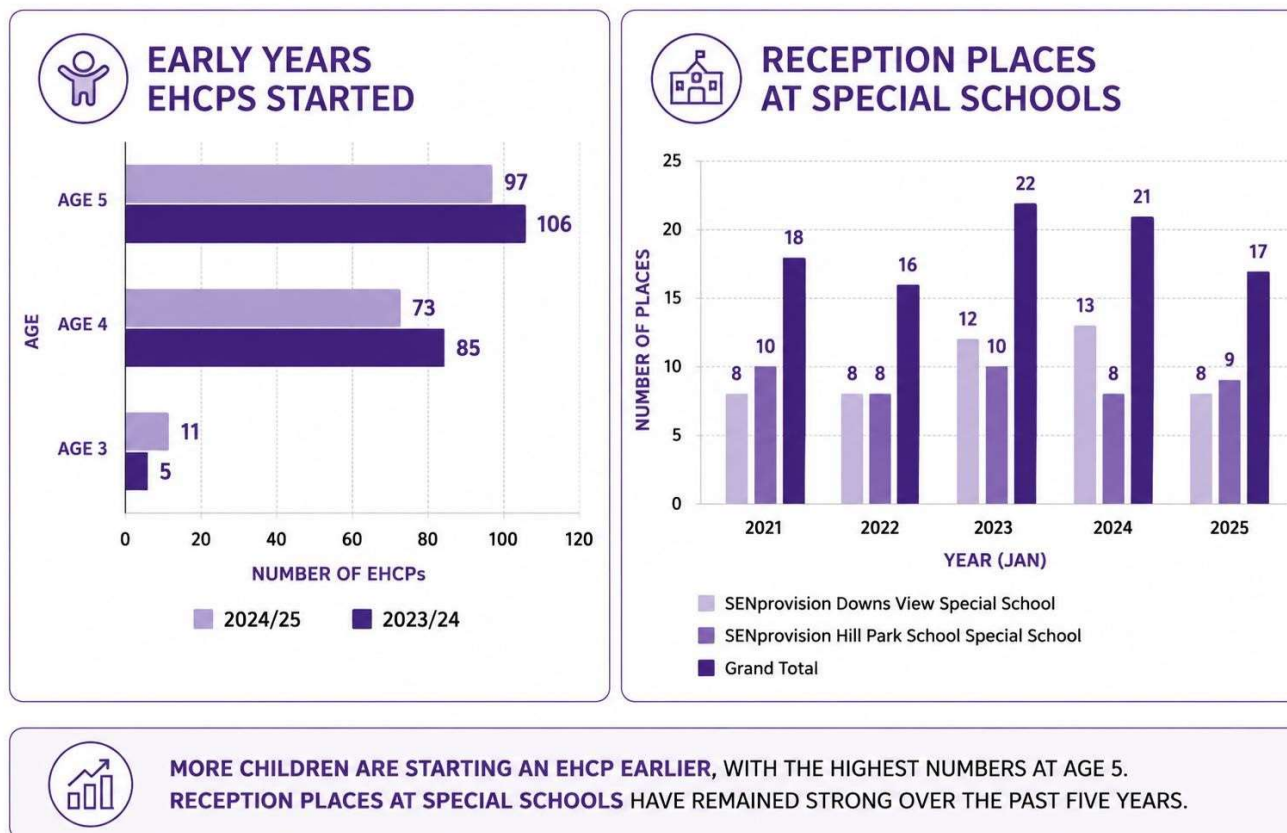
THE NUMBER OF EHCP PLANS HAS INCREASED EVERY YEAR OVER THE PAST EIGHT YEARS, RISING BY 14% IN 2025/26 TO OVER 3,100 PLANS.

Early Years

The number of plans for Early Years remains significant, with most plans starting when the child is age 5. 2024/25 shows a slight increase in plans initiated at age 3 for under 5's.

Fewer plans are recorded for children aged 5 at the time of the plan starting, but the overall trend suggests early identification and support is improving. Current data indicates that age 5 is the most common point for EHC plan initiation, highlighting the importance of early years intervention.

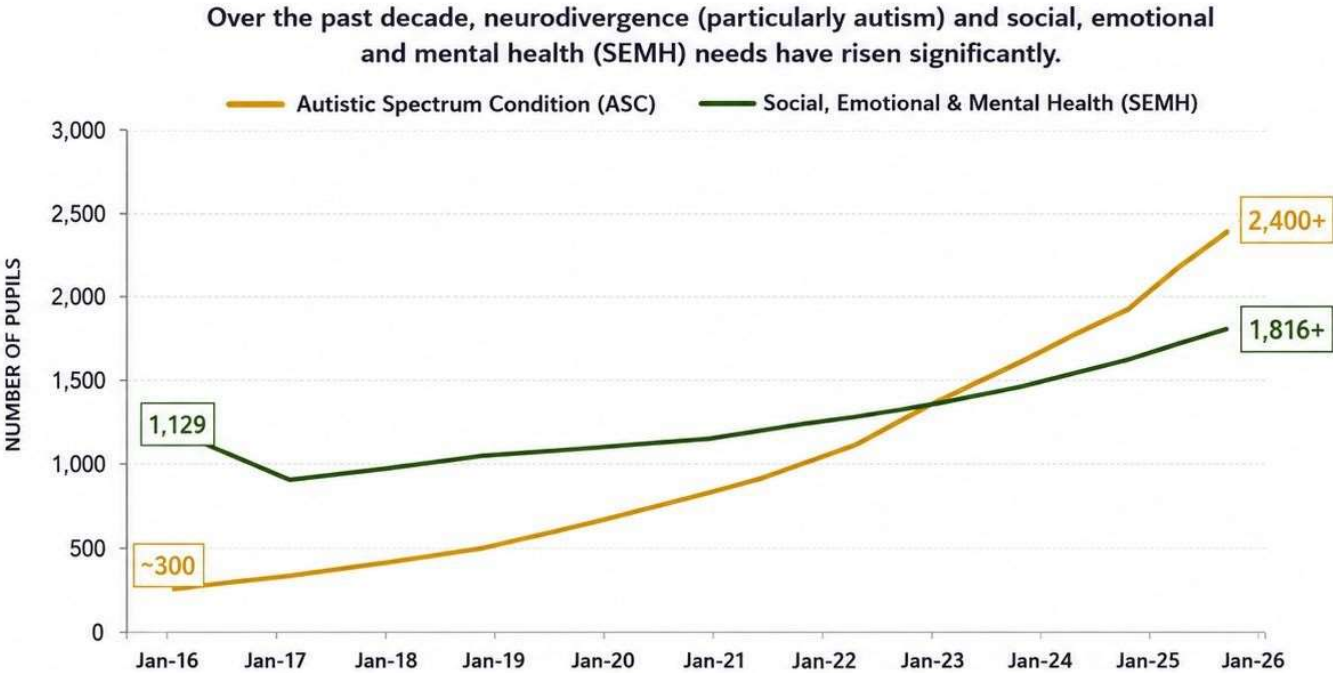
Early Years transfers to Special School Reception places have varied over time, peaking in 2023 (22 places) and then gradually declining to 17 places in 2025. The decline is due to lack of available spaces in specialist provision and not a reduction in demand, which has grown. The grand total shows a clear peak in 2023 (22 places), followed by a downward trend meaning more children with complex needs are either being educated in mainstream or out of area. This demonstrates a capacity pressure with local specialist provision that needs to be addressed.



School aged pupils with SEND

For pupils receiving SEND Support in schools, the most common primary need is Social, Emotional and Mental Health (SEMH). For pupils with an Education, Health and Care Plan, the predominant need is Autism. The largest proportion of EHC Plans are held by children and young people aged 11–15, aligning with national and statistical neighbour benchmarks.

BRIGHTON & HOVE ALL SEND PRIMARY NEED TREND
Jan 2016 – Jan 2026



With the exception of speech and language needs, all other need categories have remained stable or declined.

KEY TRENDS (2016 – 2026)

AUTISTIC SPECTRUM CONDITION (ASC)

2,400+ in Jan 2026
Just over 300 in Jan 2016

~700% INCREASE
over the past decade

SOCIAL, EMOTIONAL & MENTAL HEALTH (SEMH)

1,816+ in Jan 2026
1,129 in Jan 2016

~60% INCREASE
over the past decade

The largest proportion of EHC Plans are held by children and young people aged 11–15.

These trends highlight the need for a targeted focus on provision for SEMH and neurodivergence (particularly autism) across all age ranges and levels of need. This will be central to the city’s SEND sufficiency planning and commissioning priorities.

This table shows how the profile of need has evolved in the city schools over the past decade. This highlights significant increases in both the SEND support and EHC Plan cohorts.

SEN PRIMARY NEED – ALL SEN PUPILS	Jan-16	Jan-17	Jan-18	Jan-19	Jan-20	Jan-21	Jan-22	Jan-23	Jan-24	Jan-25	Jan-26
Autism	308	333	417	529	768	874	1,060	1,251	1,629	1,930	2,409
Social, Emotional & Mental Health	1,129	909	1,033	1,067	1,126	1,178	1,249	1,385	1,512	1,681	1,816
Speech, Language & Communication Needs	1,334	1,280	1,236	1,194	1,176	1,213	1,339	1,406	1,427	1,421	1,422
Specific Learning Difficulty	1,542	1,231	1,264	1,402	1,236	1,226	1,251	1,229	1,343	1,347	1,305
Moderate Learning Difficulty	809	681	593	583	596	579	553	538	421	382	366
Physical Disability	161	147	151	224	222	210	213	188	172	166	149
Hearing Impairment	117	115	114	97	104	96	97	109	105	106	124
Severe Learning Difficulty	164	172	167	180	145	156	142	133	109	99	95
Visual Impairment	54	47	50	52	55	58	66	65	59	61	45
Profound & Multiple Learning Difficulty	45	44	44	36	39	35	35	30	28	22	17
Other Difficulty/Disability	220	311	254	82	47	35	22	19	16	21	21
Multi-Sensory Impairment	7	10	15	17	23	21	30	27	24	17	16
Down Syndrome (New 2025)										10	21
No specialist assessment of need	266	161	94	8	1	2	4	0	0	0	0
TOTAL	6,156	5,441	5,432	5,471	5,538	5,683	6,061	6,380	6,845	7,263	8,076

Current Specialist provision in Brighton and Hove

The January 2026 school census shows that around 70% of school-aged pupils with an EHCP are educated in mainstream schools, including those attending resourced provisions and SEN units. Around 20.2% attend special schools.

The wider SEN2 cohort presents a different profile as it includes all children and young people aged 0–25 with an EHCP, including those in further education, alternative provision and other specialist settings.



~70%

of school-aged pupils with an EHCP are educated in **mainstream** schools (including resourced provisions and SEN units)

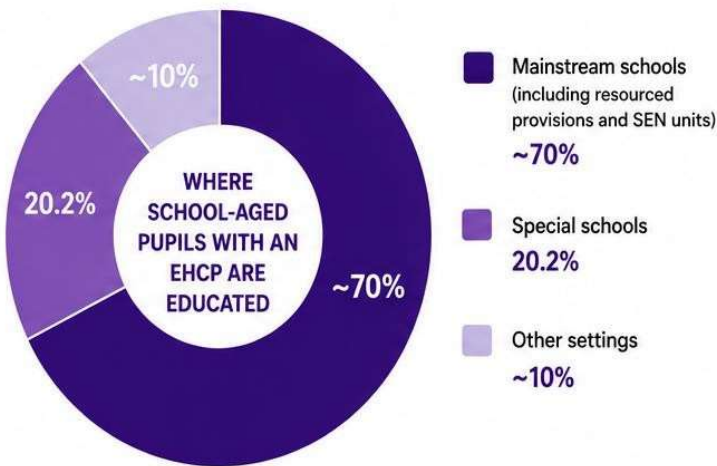


20.2%

of school-aged pupils with an EHCP attend special schools

SCHOOL CENSUS (JAN 2026)

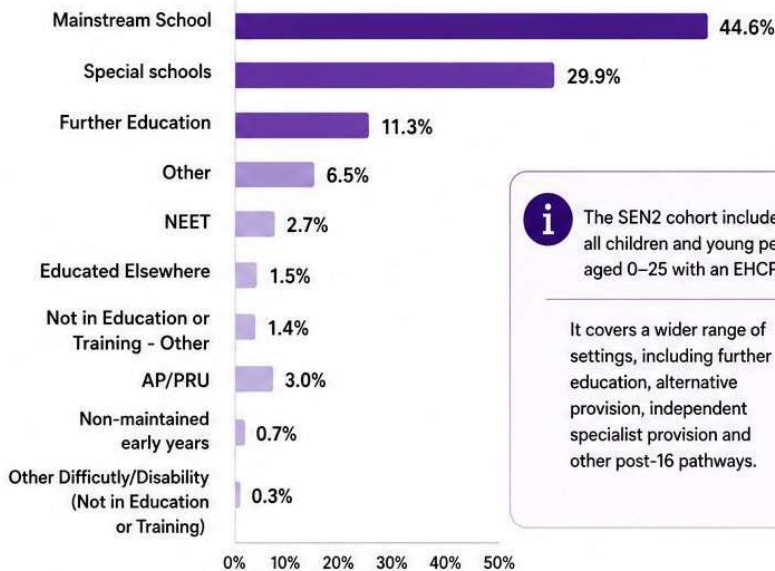
EDUCATION OF SCHOOL-AGED PUPILS WITH AN EHCP



Source: School Census January 2026 (school-aged pupils only)

WIDER SEN2 COHORT (0–25)

BREAKDOWN BY EDUCATION ESTABLISHMENT TYPE



The SEN2 cohort includes all children and young people aged 0–25 with an EHCP.

It covers a wider range of settings, including further education, alternative provision, independent specialist provision and other post-16 pathways.

Source: SEN2 January 2026 (0–25 cohort)

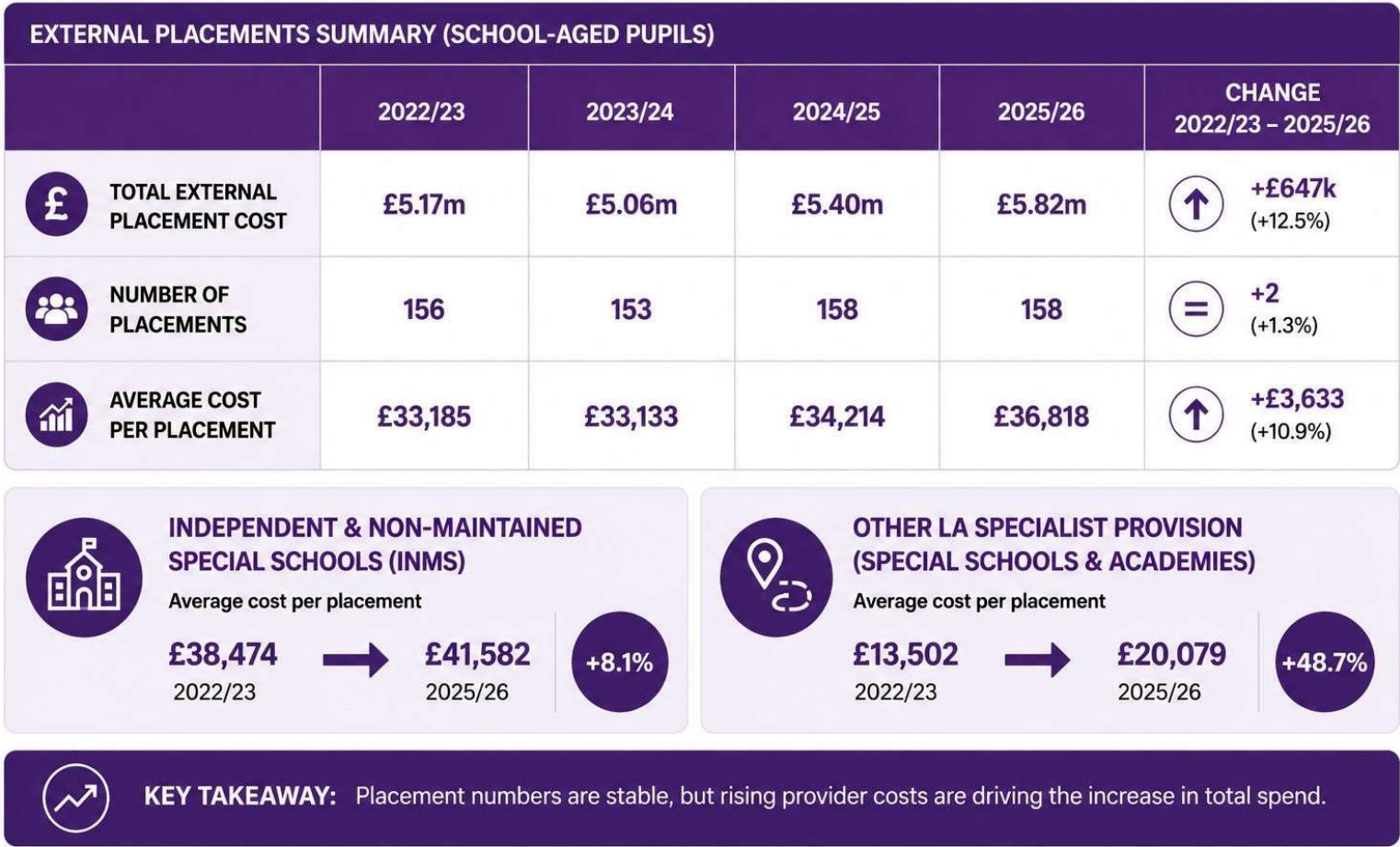


KEY TAKEAWAY: Most school-aged pupils with an EHCP are educated in mainstream schools. The wider 0–25 cohort shows a broader range of educational settings.

Cost of placements outside of Brighton and Hove

Over the last four years, the number of school-aged pupils placed outside Brighton C Hove has remained relatively stable, fluctuating between 153 and 158 placements per year. However, the overall cost of these placements has continued to rise due to increasing provider fees across both independent and non-maintained special schools and specialist provision commissioned from other local authorities.

The total cost of external school-based placements increased from £5.17m in 2022/23 to £5.82m in 2025/26, an increase of £647k (12.5%), despite placement numbers remaining broadly unchanged. The average cost of an independent or non-maintained special school placement increased from £38,474 to £41,582 over the same period. Costs associated with specialist provision commissioned from other local authorities have risen more significantly, with the average placement cost increasing from £13,502 to £20,079.



Projections of future demand for school age population for Autism and Social, Emotional and Mental Health

The local data demonstrates that the city needs to prioritise developing provision for Autism (84% rise in 10 years) and SEMH (over 30% increase in 10 years). Detailed projection work has been carried out on these populations, and this can be found in the data and information pack.

Brighton C Hove City Council undertook analysis in May 2025 to provide projections of children and young people aged 0 to 25 with EHC plans for each year from 2026 to 2032 by Autism and Social, Emotional and Mental Health categories of need. This is for the Brighton and Hove resident population of children and young people and not those attending education establishments within the Brighton and Hove area.

The number of children and young people aged 0-25 with an EHC Plan is projected to increase from 2,886 in May 2025 to 4,427 in 2032, an increase of 50% in terms of the number of children and young people. Or an increase from 4.0% to 6.1% of 0–25-year-olds.

Table A: Projected number and percentage of children and young people aged 0–25, with an EHCP, Brighton & Hove residents, 2025 to 2032

Year	Projected number	Population age 0 to 25	Projected percentage of 0–25-year-olds
2025	2,886	72,112	4.0%
2026	3,108	72,238	4.3%
2027	3,332	72,195	4.6%
2028	3,554	72,242	4.9%
2029	3,769	72,230	5.2%
2030	3,990	72,171	5.5%
2031	4,214	72,210	5.8%
2032	4,427	72,134	6.1%

Source: Brighton & Hove City Council education team (May 2025)

By primary need, it is projected that:

- The number of children and young people with autism aged 0-25 years as their primary need will increase from 1,058 in 2025 to 1,912 in 2032 – an 81% increase. Or an increase from 1.5% to 2.7% of all 0–25-year-olds.
- The number of children and young people aged 0-25 years with social, emotional or mental health (SEMH) needs as their primary need will increase from 598 in 2025 to 973 in 2032 – a 63% increase. Or an increase from 0.8% to 1.3% of all 0–25-year-olds.
- The number of children and young people aged 0-25 years with other primary needs will increase least, from 1,230 in 2025 to 1,432 in 2032 – a 16% increase. Or an increase from 1.7% to 2.0% of all 0–25-year-olds.

Table B: Projected number and percentage of children and young people aged 0–25, with an EHCP by primary need, Brighton & Hove residents, 2025 to 2032

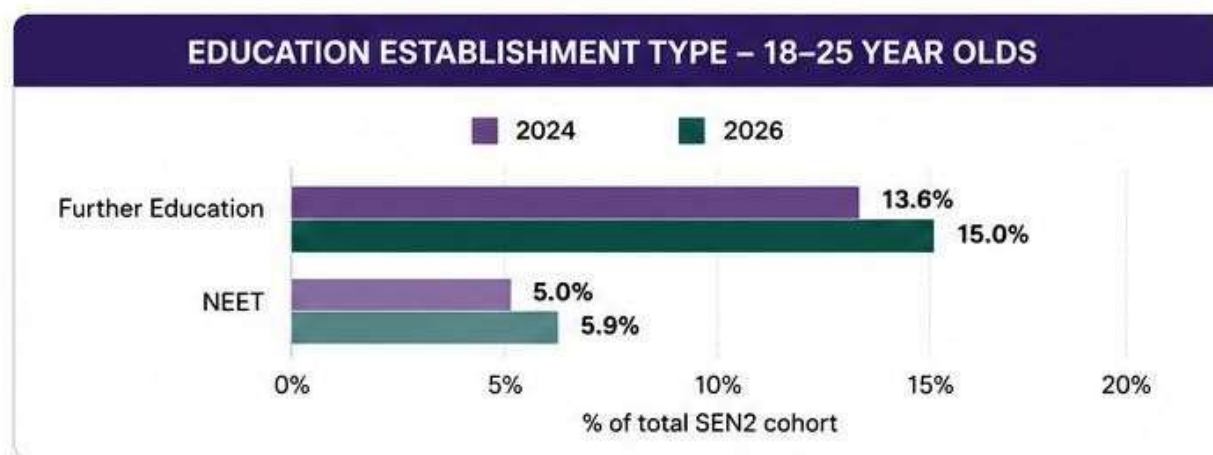
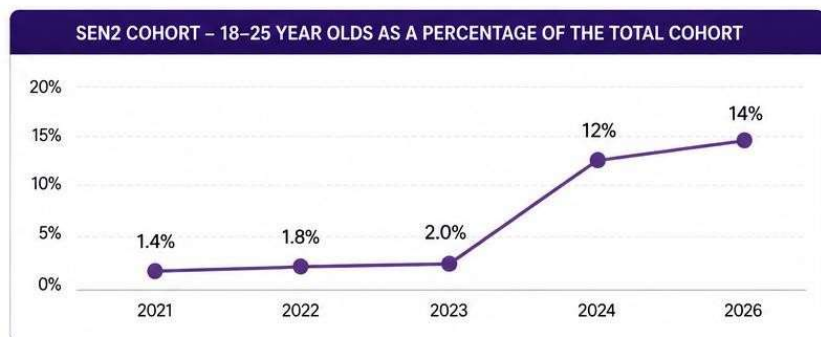
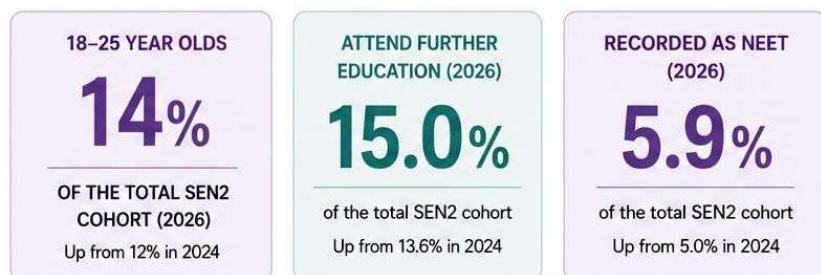
Year	Numbers			Percentage of 0–25-year-olds		
	Autism	SEMH	Other	Autism	SEMH	Other
2025	1,058	598	1,230	1.5%	0.8%	1.7%
2026	1,182	658	1,268	1.6%	0.9%	1.8%
2027	1,304	720	1,308	1.8%	1.0%	1.8%
2028	1,428	779	1,347	2.0%	1.1%	1.9%
2029	1,550	835	1,384	2.1%	1.2%	1.9%
2030	1,671	897	1,422	2.3%	1.2%	2.0%
2031	1,794	958	1,462	2.5%	1.3%	2.0%
2032	1,912	973	1,432	2.7%	1.3%	2.0%

Source: Brighton & Hove City Council education team (May 2025)

Post 16

Most young people with an EHC plan aged 16–19 attend mainstream further education colleges across Brighton C Hove, East Sussex and West Sussex. The strategic development of post-16 provision is coordinated across Sussex through the Post-16 SEND Strategic Planning Group, which includes representatives from all local authorities. Whilst local specialist provision supports some young people, others continue to access specialist placements outside the city.

The number of young people aged 18–25 with an EHC plan continues to grow and now represents a significant proportion of the overall EHCP cohort. As of January 2026, 14% of all EHC plans maintained by Brighton C Hove were for young people aged 18–25, compared with 12% in 2024.

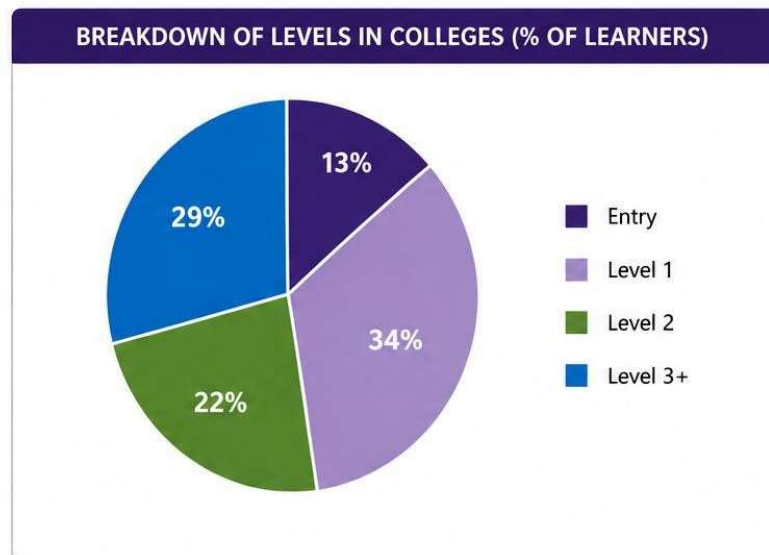
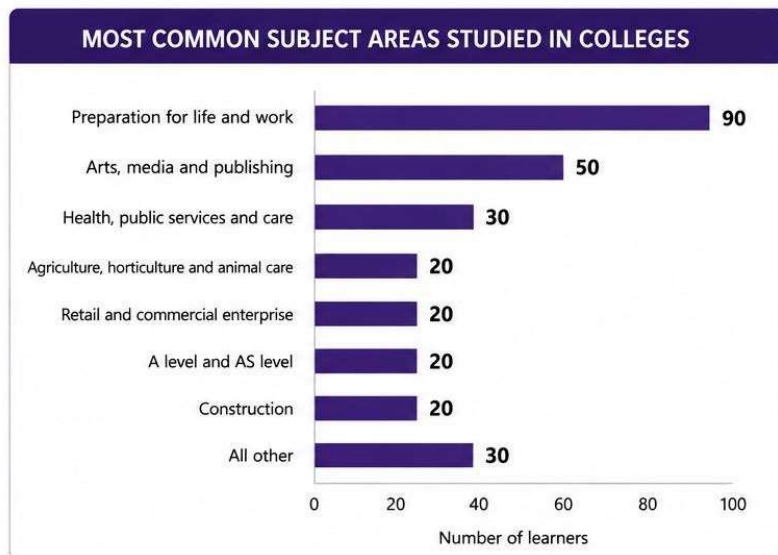


Source: SEN2 (2026 and 2024), RCU Research & Market Intelligence, DfE (2024)

Autism and Social, Emotional and Mental Health (SEMH) remain the most prevalent primary needs within the post-16 cohort. Research commissioned by the Sussex Post-16 SEND Strategic Planning Group indicates that demand from learners with autism is expected to continue increasing significantly over the coming decade.

Most post-16 learners with an EHC plan attend further education provision. The proportion of the SEN2 cohort attending further education increased from 13.6% in 2024 to 15.0% in 2026. Brighton C Hove continues to experience higher levels of young people with an EHC plan who are not in education, employment or training (NEET) than national comparators.

Research commissioned by the Strategic Planning Group identified approximately 280 learners with an EHC plan attending mainstream further education provision across the city. Learners access a broad range of courses from Entry Level through to Level 3+, with Level 1 programmes representing the largest area of provision.



SPECIALIST POST-16 PROVISION IN THE CITY (ACTUAL NUMBERS)	
Provider	Places
Downs View Link College	46
Downs View Life Skills	31
Supajam (INMS)	28
St Johns Integrated College	4
St Johns College	8
TOTAL	117

SUPPORTED INTERNSHIPS IN THE CITY (ACTUAL NUMBERS)	
Provider	Places
Team Dominica	24
St Johns Project Search	4
TOTAL	28

A smaller cohort of young people access specialist post-16 provision and supported internships. Current local specialist provision includes Downs View, Supajam and St John's College, alongside a range of supported internship opportunities. There remain a number of young people who require independent specialist provision outside Brighton C Hove.

Insights for future provision

Financial Pressures

External placements: Costs up £1M in 3 years; average INMS placement £38,825.
High Needs Block: £40M budget; £23.6M spent on special schools; £4.76M on INMS.

Demand Trends

EHCP growth: 67% increase over 5 years; rising 10–13% annually.
Projected EHCPs: From 2,886 (2025) to 4,427 (2032) – 50% increase.
Autism & SEMH: Autism up 81%, SEMH up 63% by 2032.
Early Years: Most plans start at age 5; early intervention is critical.

Post-16 Insights

EHCP learners in colleges rose to 280 (23/24); autism predicted to double by 2033.
Most popular courses: Level 1, life/work prep, arts/media, health/public services.
Need for specialist pathways and supported internships

Health s Diagnostic Context

Long waits for autism/ADHD diagnosis (up to 4 years); 18,000 CYP waiting in Sussex.
Implications: Schools need robust support for undiagnosed neurodiverse pupils.

Strategic Priorities

Develop primary autism resource provisions (1 central and 1 east).
Create secondary autism resource provisions.
Consider primary specialist provision for autism and SEMH that includes mainstream school as part of the model.
Expand secondary provision for autism + SEMH (2027/28).
Rationalise SEMH provision; ensure PRU/Specialist capacity.
Explore KS1 SEMH provision.
Address post-16 gaps: work with FE providers, expand supported internships.

Current Gaps

20% of pupils placed outside Brighton & Hove.
Autism provision: Hive and Cullum Centre provide well, but demand exceeds capacity.
SEMH provision needs rationalisation.
Post-16: High NEET rate; limited supported internships.
The provision of high quality data.

Health Data

NHS National Referral Numbers and Waiting times

Autism: As of March 2025, 137,977 children were waiting for an autism assessment in children's mental health services.

ADHD: The number of children waiting for an ADHD assessment was significantly higher up to 316,000 children.

These figures reflect a growing demand for neurodevelopmental assessments, with many services overwhelmed and unable to meet the rising need.

Autism

As of June 2025, 236,225 people (including children and adults) were waiting for an autism assessment.

89% of those waiting had exceeded the 13-week NICE guideline for assessment.

The average waiting time for an autism assessment is now over 17 months, which is 200 days longer than the previous year.

ADHD

ADHD waiting times vary widely across regions. Some children wait over four years for a diagnosis.

Brighton and Hove

The Brighton and Hove Neurodevelopmental Pathway (NDP) Team within Sussex CAMHS is the smallest team both geographically as well as size. In the year 2025, Brighton NDP team completed 72 full diagnostic assessments. This includes ADHD assessments, ASC assessments and assessments that concluded non- diagnosis. This does not include partial or incomplete assessments. The frequency of diagnosis is almost split equally between the 2 conditions. Sussex CAMHS Neurodevelopmental Services receive more than 600 referrals per month which is leading to long waits for a full assessment and diagnosis.

It is considered that there are approximately 18,000 children and young people in Sussex waiting for a Neuro Developmental Pathway (NDP) assessment with Sussex CAMHS.

Reliable NHS Sussex data on diagnostic rates in Sussex has been difficult to publish in recent years due to the need for an updated data system. A new system is now in operation, and more reliable data will be possible to collate. (agreed statement with CAMHS)

Financial analysis

The high needs block (HNB) funds all the support to SEND and vulnerable young people 0-25.

In 24/25 financial year the value of the HNB is just under £40 million, rising to just over £40 million in 25/26. Approximately £9.2 million is spent on mainstream EHCP's and resource provisions and £23.6 million is spent on special school provision (including the council's special schools and alternative provision).

The remaining budget funds medical needs support, inclusion and support services and the virtual school.

Provision Type	2024/25 (£)	2025/26 (£)	Change (£)	Change (%)
Mainstream Top-Up Funding (BHCC Schools & Academies)	5,965,184	7,250,694	+1,285,510	+21.6%
Special School Funding (including Central Hub)	14,280,675	15,885,642	+1,604,967	+11.2%
Specialist Units & Resource Bases	1,732,945	2,053,098	+320,153	+18.5%
Top-Up Funding for Schools in Other LAs	1,142,179	1,690,560	+548,381	+48.0%
Independent & Non-Maintained Special Schools	5,400,000	5,820,000	+420,000	+7.8%
Personal Budgets, EOTAS & Alternative Provision	1,371,803	2,131,664	+759,861	+55.4%
Post-16 Colleges & Providers	1,170,390	1,246,603	+76,213	+6.5%
Post-19 Specialist Providers	2,007,535	2,128,295	+120,760	+6.0%

Future provision will fit into one of the above categories and will be costed as such.

How this plan was developed

The SEND Strategy 2021-2026 was the driver for the SEND sufficiency plan. The strategy has 6 outcomes to achieve the **better outcomes, better lives** vision which are:

1. Inclusion
2. Early Identification and Intervention
3. SEND Pathways
4. Achievement and Outcomes
5. Transition and Preparing for the Future
6. Sufficiency of SEND Services and Provision (SF1-SF16)
7. Development of Alternative Provision (added as part of the SEND and AP Change Programme work)

The sufficiency plan is the outworking of outcome 6, 'Sufficiency of SEND Services and Provision'. from

In the first 4 years some of the original actions (1-16) in the first sufficiency workplan were achieved.

The SEN Sufficiency Workstream was revised in January 2025 in line with Education and Learning Directorate's workstream agreements with schools. This workstream (comprised of school and provision leaders, LA officers and parent carer forum representation) has supported the development of the plan

To ensure the right provision is being developed at the right time, a full data refresh was requested in January 2025. This ensured that developments were being made in the right areas, and the council is neither under or overproviding for any type of SEND needs.

The plan needs to dovetail with the Schools White Paper and any changes in the delivery of AP services (programme leads are a part of the group membership)

The plan will need to be further developed with the education community, children and young people, parent representative groups and stakeholders.

What we have done so far and what is planned

1. The Brighton and Hove Principles of belonging

Priority 1 of the SEND Strategy 2021–2026 focuses on Inclusion. The Inclusion action plan (Inclusion 1) focussed on the co-production of a city-wide charter for inclusion. This was co-produced with children and young people and led to the development of the principles of belonging.

- Happy
- Safe and secure
- Heard
- Accepted

These principles enable children and young people to grow and learn. All provision must be developed in this way to enable to principles to be put into practice.

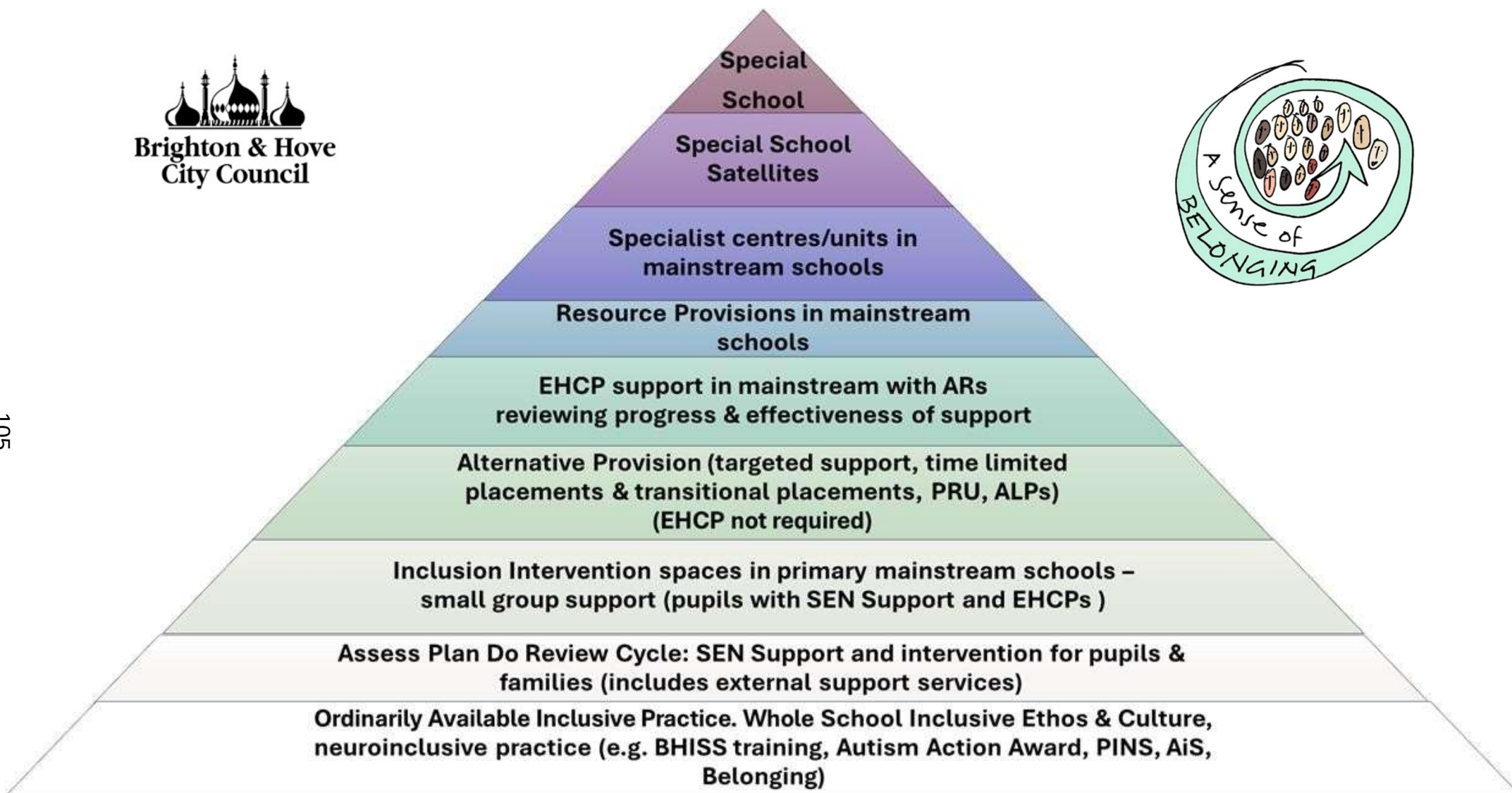
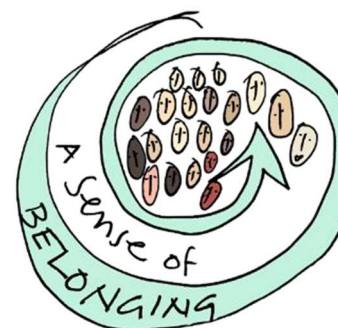
2. Ordinarily Available Inclusive Practice (OAIP) guidance has been co-produced over the course of a year, for schools and is due to be launched in March 2026.

Brighton C Hove has co-produced (with parents/carers, young people, schools and a range of education professionals) a city-wide Ordinarily Available Inclusive Practice (OAIP) guidance to define what mainstream schools should reasonably be able to provide for children and young people with SEND without requiring an EHC Plan. This guidance aims to:

- Promote inclusive education through high-quality teaching and learning.
- Set clear expectations for schools and early years settings.
- Encourage consistency across educational settings.
- Support educators with effective strategies to meet diverse needs.
- Embed inclusive teaching approaches that benefit all learners 1.

The first draft of this guidance will launch in March 2026 for schools, with a review of its effectiveness taking place with stakeholders in autumn 2026. Following a year of piloting the guidance, feedback received from the review will then be used to update the guidance into a final draft which will be available to schools in January 2027. Work on drafting a version of the guidance for parents/carers will begin in Spring 2026 ready to upload onto the council's Local Offer web page in Summer 2026.

SEND Provision Graduated Approach in Schools



Over the period of the SEND Strategy the following interventions and provisions have been developed:

Tier 1: (Targeted Support)	In September 2024, 5 primary schools were identified to run a Inclusion Intervention Spaces (IIS) pilot. All schools had set up the provision by the spring term 2025 and were starting to gather data and feedback from children, parents and staff. Review and evaluation demonstrated that the pilot was successful meeting all the desired outcomes, and phase 2 will commence in the 2025/26 academic year with a further 8 schools. Funding was given to assist secondary schools with Tier 1 (targeted support) development. A robust evaluation of the impact of this funding demonstrated an increase in positive outcomes for children and young people. The council has committed to continue to provide this funding on an annual basis
Tier 2: (Targeted support)	ALPs (Adaptive Learning Provisions) are being developed in four of our secondary schools.. The ALP at Patcham High school is now well established, as is the ALP at Varndean secondary school. Each ALP is funded for 9 places and is supported by an educational psychologist and a senior SEMH practitioner. Feedback on this Tier 2 (targeted support) model has been positive and data using an agreed set of Key Performance Indicators is currently being gathered to show impact. Two further ALPs, opened at the start of Spring Term 2026 with Blatchington Mill and BACA Secondary Schools, and are now receiving young people into their ALPs. There is a total of 36 Tier 2 ALP places available to support young people across the four secondary schools. As part of the SEND C AP Change Programme pilot work, the Alternative Provision Specialist Taskforce (APST) was initially co-located at the Central Hub. The original remit for the APST was to work with children and young people who were most at risk of criminal activity in the community and those at significant risk of permanent exclusion. Specialist staff worked with the Central Hub to support the Tier 2 turnaround programme and reintegrate young people back into school, From September 2025, the APST model moved out of CHB to operate as an outreach team, co-located in two primary schools and one secondary school. The APST is now working primarily as an early intervention outreach team, focusing on young people who are at risk of exclusion. Funding for this team has been provided through the Change Programme which will finish in July 2026.
Tier 3: (Targeted Plus)	The Central Hub Brighton, which provides places for children and young people with social, emotional and mental health provision, has expanded full time/long stay places to support children and young people who are moving on to a new setting or to post 16 provisions (if placed at the Connected Hub KS4)
Tier 4: (Specialist)	The Hive, part of Hill Park Special School opened for secondary aged children with autism and by September 2024 had 45 pupils on roll. It now has 67 places. The Cullum Centre was opened in September 2021, a specialist secondary phase unit for children with autism, at Hove Park School. It has since extended provision into KS5 and supports a preparation for adulthood focus supporting young people in Further Education. Homewood School closed for children and young people with SEMH, in September 2024, The Central Hub made provision for year 7 pupils (year 7 and 8 from September 2025, 24 places). Beckmead Academy Trust opened KS4 provision at St George's House which has 20 places.

SEND Sufficiency Plan 5 Key Priorities 2026-202G:

1. Expand Provision for neurodivergent pupils in mainstream	<u>Actions:</u> Identify and agree sites for primary and secondary autism support bases during 2025/26. Open Moulsecoomb Primary Autism Support Base (The Roost): Phase 1: 8 pupils – January 2026 Phase 2: 8 pupils – April 2026 Develop Stanford Junior Autism support base 12-16 places – 2027. Establish 20-place secondary Autism support base – September 2027. Establish 20-place secondary Autism/SEMH specialist support base– September 2028.
2. Strengthen SEMH Provision	<u>Actions:</u> Rationalise SEMH provision across the city including a review of the Central Hub Brighton (CHB), creating a vision and purpose for future need. Establish Tree House primary PRU as a pilot for an academic year 2025/26. Evaluation summer 2026. Create 12 specialist Year 9 SEMH places by September 2026. Work with schools enabling them to create a more inclusive/principles of belonging approach to managing young people with an SEMH profile (reduction in suspensions, permanent exclusions and managed moves). Through the Inclusion workstream, co-produce and financially model a robust Outreach Support offer for schools which will replace the current APST when it comes to an end in July 2026.
3. Develop Specialist Autism /SEMH Provision	<u>Actions:</u> Design and open 3 primary specialist support bases (12-16 places per unit) in mainstream schools for children with autism and SEMH (36-48 places) Include assessment places and outreach/training model for mainstream schools. Target opening: September 2028.
4. Strengthen Early Years and Primary Specialist/support base provision	<u>Actions:</u> Strengthen the provision of specialist nursery places in the city and the transition of children into school through phased development of Early years Inclusion Bases in geographical areas in the city (8 places per base) Develop 2 support bases in mainstream schools (12-16 places per unit) for children who have complex needs (target opening September 2027). Create EYFS specialist places. Include outreach/training model for mainstream schools
5. Address Post-16 Provision gaps	<u>Actions:</u> Continue to work Sussex wide in the development of appropriate post 16 courses Review post-16 SEND provision and collaborate with providers to ensure appropriate pathways and capacity Increase Supported Internships in the city to create more opportunities for work (20 places)

All developments are dependent on good and frequent communication with stakeholders. The Council will work with key partners through the SEND and AP partnership Board to ensure strategic oversight and governance is in place.

Stakeholders will receive updates on the plan and the progress towards the key priorities through established communication channels.

Glossary of Terms

ADHD	Attention Deficit Hyperactivity Disorder
BHCC	Brighton and Hove City Council
SEMH	Social Emotional and Mental Health Needs
SLD	Severe Learning Difficulties
EHC	Education, Health and Care
PRU	Pupil Referral Unit
ALP	Adaptive Learning Provision (Secondary schools)
IIS	Inclusion Intervention Space (Primary schools)
APST	The Alternative Provision Specialist Taskforce
NDP	Neuro Developmental Pathway
INMS	Independent Non-Maintained School
AP	Alternative Provision
P16	Post 16
HNB	High Needs Block
PiNS	Partnerships for Inclusion of Neurodiversity in Schools
AiS	Autism in Schools

This plan will remain a flexible document and will be reviewed and adjusted in line with any legislative changes ensuring compliance and alignment with statutory requirements

General Equality Impact Assessment (EIA) Form

Support:

An [EIA toolkit](#), [workshop content](#), and guidance for completing an [Equality Impact Assessment \(EIA\) form](#) are available on the [EIA page](#) of the [EDI Internal Hub](#). Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact the Equality, Diversity, and Inclusion (EDI) team by emailing Equalities@Brighton-Hove.gov.uk. If your request is urgent, please mention this in the subject line of your email so we can support as required.

Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Team. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the 'activity' you are assessing.

Process:

- Once fully completed, submit your EIA to the Equalities team by emailing the Equalities inbox and copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), any other relevant service colleagues to enable EIA communication, tracking and saving.
- Your EIA will be reviewed, discussed, and then approved by the assigned EDI Officer and after seeking additional approval as appropriate for your EIA.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the [EIA toolkit](#) for more information.

Name of activity or proposal being assessed:	Special Educational Needs and Disabilities (SEND) Sufficiency Plan 2026-2029
Directorate:	Families, Children and Wellbeing
Service:	Education and Learning
Team:	SEND Statutory Service/School Organisation
Is this a new or existing activity?	New strategic activity. The SEND Sufficiency Plan 2026-2029 is a strategy setting out how the Council will discharge its statutory duty under Section 14 of the Education Act 1996 to secure sufficient school places for children and young people with SEND. It builds on the SEND Strategy 2021-2026, in which SEND sufficiency was identified as one of the six key priorities.

Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	The Plan is a strategic enabling document. Each individual provision proposal that flows from it will be the subject of its own statutory process and its own individual Equality Impact Assessment in due course.
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2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Rhianned Hughes, Head of SEN Statutory Service
Accountable Manager:	Georgina Clarke-Green, Director of Education and Learning
Additional stakeholders collaborating or contributing to this assessment:	

3. About the activity

Briefly describe the purpose of the activity being assessed:

The SEND Sufficiency Plan 2026–2029 sets out the city's strategy for ensuring sufficient and appropriate education places for children and young people with Special Educational Needs and Disabilities (SEND) over the next three years, and identifies a programme of new and expanded provision to address known and projected gaps in capacity.

Demand for SEND places in Brighton & Hove has grown significantly over the past decade. In January 2025, 24% of pupils in the city (7,263) were identified as having SEND, compared with the national average of 18%. The number of children and young people with an Education, Health and Care Plan (EHCP) is projected to rise from 2,886 in May 2025 to 4,427 by 2032, an increase of 50%. Autism and Social, Emotional and Mental Health (SEMH) needs continue to be the largest and fastest-growing categories of need.

The Plan responds by setting out a phased programme of provision, the headline elements of which are: three new Autism Resource Units (ARUs) of 20 places each at Patcham High School, Cardinal Newman Catholic School and Stanford Junior School; a further expansion of Inclusion Intervention Spaces (IIS) in primary schools (an additional 10 places in 2026/27); and changes underway at the Central Hub Brighton (CHB), the city's specialist alternative provision for children with SEMH needs, including a new leadership model and proposed site changes for 2026/2027.

The Plan has been developed in the context of significant national SEND and Alternative Provision (AP) reform, including the SEND and AP Improvement Plan (2023), the Schools White Paper 'Every Child Achieving and Thriving' (2025) and the parallel SEND Reform consultation 'Putting Children and Young People First' (2025). It is consistent with the Council's Principles of Belonging and the Ordinarily Available Inclusive Practice (OAIP) guidance.

The SEND Sufficiency Plan is not itself a statutory document. It sets out the Council's strategic approach to discharging its Section 14 duty and informs the prioritisation and sequencing of individual provision proposals. Each individual proposal that requires a statutory process — for example a prescribed alteration under the Education and Inspections Act 2006 — will be the

subject of separate consultation, statutory notice, decision-making and its own Equality Impact Assessment.

What are the desired outcomes of the activity?

The desired outcome of the SEND Sufficiency Plan 2026–2029 is that children and young people with SEND in Brighton & Hove can access sufficient, appropriate and high-quality education provision that meets their needs as close to home as possible.

The Plan is intended to increase local specialist capacity in a planned way, reduce reliance on costly out-of-area placements, and improve the ability of mainstream schools and specialist settings to respond to rising demand, particularly in relation to autism and SEMH needs.

It also aims to support earlier intervention, greater inclusion and better transition pathways for children and young people with SEND, so that more pupils are able to learn in the right provision at the right time, with improved consistency of support and improved outcomes for families.

At a strategic level, the Plan is intended to provide a clear framework for prioritising future provision proposals and investment decisions, ensuring that the Council can meet its statutory sufficiency duties in a way that advances equality of opportunity and supports an inclusive education system across the city.

These outcomes directly support the three aims of the Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010: (1) eliminating unlawful discrimination, harassment and victimisation — by reducing structural barriers to appropriate provision and ensuring all children with SEND can access education without being disadvantaged by their disability or other protected characteristics; (2) advancing equality of opportunity — by creating sufficient local specialist provision, improving early identification, and strengthening inclusive practice so that children with SEND have equitable access to appropriate education alongside their peers; and (3) fostering good relations — by promoting inclusive schooling, building understanding of diverse needs across school communities, and supporting the integration of specialist provision within mainstream settings.

Which key groups of people do you think are likely to be affected by the activity?

The groups most directly affected by the Plan are children and young people with SEND (in particular those with autism and SEMH needs) and their families; the school communities of the schools identified as hosts for new provision; and staff working in specialist and alternative provision, including at the Central Hub Brighton. The Plan also affects the wider school system, given the move towards SEND school groupings and a more inclusive mainstream offer.

4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

- The draft Plan has been developed through the SEN Sufficiency Workstream, which was revised in January 2025 in line with the Education and Learning Directorate's workstream agreements with schools. The workstream comprises school and provision leaders, Council officers and Parent Carer Forum representation, and has supported the development of the Plan throughout.
- A full data refresh was commissioned in January 2025 to ensure that proposed developments are informed by the most recent picture of need, and that the Council is neither under-providing nor over-providing for any type of SEND need.
- Particular attention has been given to ensuring that the views of children and young people with SEND, their families, and those with other protected characteristics are heard. This has included targeted consideration of Black, Asian and Minority Ethnic (BAME) and Black and Racialised Minority (BRM) parent carers with children who have SEND; families where English is an Additional Language (EAL); and children and families living in temporary accommodation, who can face heightened barriers to engagement and to maintaining continuity of specialist provision. Accessible formats and targeted engagement have been offered, working closely with the Parent Carer Council (PaCC), and other recognised representative groups.
- Engagement with PaCC confirmed that parent carers value increased local provision and the reduction in out-of-area placements as a priority, and raised the importance of consistent transition support, clear communication about how new provision will be accessed, and the need for schools to have the skills and resources to support children before EHCP thresholds are reached.
- Reaching out to young people, through various other recognised representative groups reinforced the importance of proximity to home, peer relationships and consistency of staffing in any new provision. These insights have directly informed the Plan's emphasis on phased and locally-rooted provision, and will be incorporated into the project-level EIAs for each individual proposal.
- As the Plan is a strategic framework, it does not itself carry a single statutory consultation. Each individual provision proposal arising from the Plan — including each of the three proposed Autism Resource Units — will be the subject of its own formal public consultation and statutory notice, and the equalities feedback gathered through those consultations will inform the project-level EIA for each proposal. This EIA will be reviewed and updated as that engagement takes place.

5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity? Consider all possible intersections.

(State Yes, No, Not Applicable as appropriate)

Age	YES
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Disability and inclusive adjustments, coverage under equality act and not	YES
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	YES
Religion, Belief, Spirituality, Faith, or Atheism	NO
Gender Identity and Sex (including non-binary and Intersex people)	YES
Gender Reassignment	NO
Sexual Orientation	NO
Marriage and Civil Partnership	NO
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	NO
Armed Forces Personnel, their families, and Veterans	NO
Expatriates, Migrants, Asylum Seekers, and Refugees	NO
Carers	YES
Looked after children, Care Leavers, Care and fostering experienced people	YES
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	NO
Socio-economic Disadvantage	YES
Homelessness and associated risk and vulnerability	NO
Human Rights	NO
Another relevant group (please specify here and add additional rows as needed)	Not applicable

Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy, numeracy and /or digital barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

If you answered "NO" to any of the above, how will you gather this data to enable improved monitoring of impact for this activity?

For characteristics currently recorded as "NO" in the table above data is either not routinely collected for the pupil population or is not directly relevant to the strategic nature of this Plan.

The Council will take the following steps to improve data coverage where practicable.

For individual provision proposals arising from this Plan, project-level EIAs will identify relevant data gaps and set out how those gaps will be addressed through local engagement and targeted outreach.

Where characteristics such as EAL status, refugee or asylum-seeker status, or temporary accommodation are relevant to access to SEND provision, the Council will work with relevant services (including the Virtual School Head) to understand and address barriers at the project level.

Feedback from consultation with recognised representative groups will continue to be used as qualitative evidence to supplement formal data, including on characteristics that are harder to capture quantitatively.

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

6. Impacts

Advisory Note:

- **Impact:**
 - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
 - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean:** Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
 - In each protected characteristic or group, in answer to the question 'If "YES", what are the positive and negative disproportionate impacts?', describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
 - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.
 - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
 - **Consider a wide range (including but not limited to):**
 - [Population and population groups](#)
 - [Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council](#)
 - [Census](#) and [local intelligence data](#)
 - Service specific data
 - Community consultations

- Insights from customer feedback including complaints and survey results
 - Lived experiences and qualitative data
 - [Joint Strategic Needs Assessment \(JSNA\) data](#)
 - [Health Inequalities data](#)
 - Good practice research
 - National data and reports relevant to the service
 - Workforce, leaver, and recruitment data, surveys, insights
 - Feedback from internal 'staff as residents' consultations
 - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
 - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#).

6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: older people, people who may be housebound, those under 16, young adults, with other intersections.	YES
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The Plan affects children and young people with SEND across the full 0–25 age range. The provision programme is deliberately phased across age groups: primary (Key Stage 2) autism provision through the proposed Stanford Junior ARU; secondary autism provision through the proposed Patcham High and Cardinal Newman ARUs; early intervention through the expansion of Inclusion Intervention Spaces in primary schools; and continued specialist alternative provision for SEMH needs through the Central Hub Brighton, including the Treehouse (primary) and the Connected Hub (Year 11).

Demand data shows growth in need across all phases, with particular pressure at transition points and a decline in Reception transfers to special schools (from a peak of 22 in 2023 to 17 in 2025) reflecting capacity pressure rather than reduced demand. By planning provision across the age range, the Plan is intended to address need at the point and phase at which it arises.

The impact is assessed as positive, in that the Plan is designed to increase age-appropriate local provision. No adverse age-related impact has been identified at the strategic level.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

Phasing of provision will continue to be informed by the annual data refresh, so that capacity is created in the right phase at the right time.

Transition planning between phases (Early Years to primary, primary to secondary, and Key Stage 4 to post-16) will be a specific consideration in the design of each new provision and will be addressed in the project-level EIA for each proposal.

Particular attention will be given to the transition for young people aged 16 and above, who are at known risk of falling out of the SEND system at the point of reaching adulthood. The Plan recognises that the EHCP framework extends to age 25, and the Council is committed to ensuring that young people with SEND are not “lost” at the 16+ transition.

The annual data refresh will track the destination and provision status of young people with EHCPs beyond Key Stage 4, and the SEN Sufficiency Workstream will consider whether current post-16 and further education capacity is adequate to meet projected demand. Where gaps are identified, they will be escalated to the relevant commissioning leads and addressed in future iterations of the Plan.

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability , considering our anticipatory duty ?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Disability and SEND are at the very heart of this Plan; children and young people with SEND are the principal intended beneficiaries. In January 2025, 24% of pupils in the city were identified as having SEND, against a national average of 18%, and 5.8% held an EHCP (national average 5.3%). The number of EHCPs is projected to rise by 50% to 2032.

Without further action, the Council would be unable to meet its Section 14 duty to provide sufficient school places for children with SEND, and reliance on out-of-area and independent/non-maintained provision — which has risen by approximately £1 million over the last three years — would continue to grow. The Plan is intended to reverse this by creating local, appropriate provision and enabling more children with disabilities to be educated close to home.

The impact on disabled children and young people is therefore assessed as strongly positive. The principal risks are implementation risks — that new provision is not designed to be fully accessible, or that transition into new provision is poorly managed — rather than risks inherent in the strategy itself.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

Each new resource base and provision will be designed to meet the needs of the children it is intended to serve, with accessibility, sensory and SEN design requirements built in from the outset and assessed through the project-level EIA and the statutory process for each proposal.

The Council will continue to apply the SEND Code of Practice and the Principles of Belonging, and will ensure that the expansion of provision does not inadvertently create a two-tier offer; the move towards Ordinarily Available Inclusive Practice (OAIP) is intended to strengthen the mainstream offer alongside specialist provision.

Home to School Transport assistance will continue to be available to eligible children, and the increase in local provision is itself expected to reduce the need for long-distance travel for many disabled children.

What [inclusive adjustments](#) are you making for diverse disabled people impacted? For example: those who are housebound due to disability or disabling circumstances, D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

As a strategic plan concerning SEND provision, inclusive adjustment considerations are embedded throughout the Plan and will be operationalised at the project level.

The following adjustments apply at the strategic level:

- Physical accessibility — all new and expanded provision will be required to meet current accessibility standards, including for wheelchair users, those with mobility difficulties, and children with sensory impairments. Accessibility requirements will be assessed as part of the capital design process for each new provision and addressed in the project-level EIA.
- Communication and information — all consultation and information materials relating to this Plan and individual proposals will be available in accessible formats, including Easy Read, large print and digital accessible formats, and in community languages with translation and interpreting on request.
- Neurodivergent and sensory needs — the design of new Autism Resource Units and Inclusion Intervention Spaces will specifically incorporate SEN design standards, including appropriate sensory environments, clear circulation routes and quiet spaces, to ensure the physical environment is accessible and supportive for neurodivergent children.
- D/deaf and hearing-impaired children — the needs of D/deaf or hearing-impaired children will be considered in the design of new provision, and specialist support will continue to be available in conjunction with the Sensory and Physical Support Service.
- Children with non-visible disabilities — the Plan's emphasis on strengthening the mainstream offer through Ordinarily Available Inclusive Practice (OAIP) is specifically intended to improve the identification of and support for children whose needs are not immediately visible and who may not yet have an EHCP.

6.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	NO
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The Plan applies to all children and young people with SEND in the city regardless of ethnicity. National evidence indicates that there are differences in the rates at which SEND is identified across ethnic groups, and that some communities can experience barriers to accessing assessment and support.

No disproportionate adverse impact on any ethnic group has been identified at the strategic level. By increasing local provision and strengthening early identification and inclusive practice, the Plan has the potential to reduce, rather than widen, any differential access to appropriate provision.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The Council will monitor patterns of SEND identification and access to new provision by ethnicity, to ensure the benefits of the Plan are shared equitably.

Engagement and consultation materials for individual provision proposals will be made available in accessible formats and community languages, with translation provided on request, so that families from all backgrounds can engage.

6.4 Religion, Belief, Spirituality, Faith, or Atheism:

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate impact on the grounds of religion or belief has been identified. The Plan is concerned with the sufficiency and type of SEND provision and does not alter the faith or non-faith character of any school.

It is noted that one of the proposed Autism Resource Units is located at Cardinal Newman Catholic School. The siting of provision at a faith school does not, of itself, give rise to an adverse equalities impact, and admission to a resource base attached to a mainstream school is determined by the child's EHCP and assessed need, not by faith.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

Where provision is located at a faith school, the Council and the school will ensure that the resource base is inclusive of and welcoming to children of all faiths and none, and that this is clear in the published arrangements for the provision.

The timetabling of consultation activity for individual proposals will take account of significant periods of religious observance.

6.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to Gender Identity and Sex (including non-binary and intersex people)?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Autism and SEMH — the two largest and fastest-growing categories of need addressed by the Plan — are, both nationally and locally, identified more frequently in boys. There is, however, growing national recognition that autism in particular is under-identified in girls, who may present differently and be diagnosed later. A sufficiency programme weighted towards autism and SEMH provision could, if not carefully designed, risk entrenching a male-weighted pattern of access.

For staff, the specialist and alternative provision workforce, like the wider education workforce, is predominantly female; changes to provision may therefore have a gendered dimension where they affect staffing.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The design and admission arrangements for new provision will be alert to the under-identification of autism in girls, and the Council will continue work — through early identification, OAIP and the Experts at Hand model envisaged nationally — to ensure girls with SEND are identified and supported.

Any staffing implications arising from changes to provision will be managed through the Council's and schools' usual HR and equalities processes, with an Equality Impact Assessment completed in relation to any HR proposals at the point staff are formally consulted.

6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No specific disproportionate impact has been identified in relation to gender reassignment. Data is not routinely collected and relies on self-disclosure.

The Council recognises that children and young people with SEND who are also exploring their gender identity may face intersecting vulnerabilities.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

Any child or young person who is transitioning or questioning their gender will be supported sensitively in any move to new provision, with settings directed to the Council's Trans Inclusion guidance and to voluntary sector organisations where appropriate

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation ?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No specific disproportionate impact has been identified in relation to sexual orientation. The Council notes that Brighton & Hove has a nationally significant LGBTQ+ community and that the city's schools generally promote inclusive values.

Sexual orientation data is not routinely collected for pupils.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

New and changed provision will be expected to maintain an inclusive and anti-discriminatory ethos. Families or young people who experience discrimination will be signposted to appropriate support in the city.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate impact in respect of pupils has been identified. For staff, marriage and civil partnership are relevant principally in the context of any HR processes that may arise from changes to provision and are addressed through standard HR procedures.

6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate impact on pupils has been identified. For staff, pregnancy and maternity are relevant in the context of any staffing changes arising from changes to provision, and are

protected through the Council's and schools' HR processes and any EIA undertaken in relation to specific HR proposals.

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate impact specific to the armed forces community has been identified. Service children with SEND will benefit from improved local provision in the same way as other children, and Service Pupil Premium continues to be recorded and applied.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	NO
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate adverse impact on migrant, asylum-seeker, refugee or EAL families has been identified at the strategic level. These families can, however, face additional barriers in navigating the SEND system and in engaging with consultation.

By improving the clarity and transparency of the city's strategic approach to SEND sufficiency, the Plan may support better understanding of, and access to, provision for these families.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

Consultation and information materials for individual provision proposals will be available in community languages and accessible formats, with translation and interpreting provided on request.

6.12 [Carers](#):

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Parent carers of children with SEND are a key group affected by the Plan, and have been actively engaged in its development through the Parent Carer Council (PaCC), Amaze and the SEN Sufficiency Workstream. Many parent carers currently experience the burden of long daily journeys where their child is placed out of area, and the uncertainty of insufficient local provision.

By increasing local provision and reducing reliance on out-of-area placements, the Plan is expected to reduce travel and logistical burdens on parent carers and to improve continuity for the children they care for. The impact on this group is therefore assessed as positive.

Young carers within the affected school communities are also considered; changes to provision should not increase caring-related barriers to attendance.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The Council will continue to work in partnership with PaCC and Amaze throughout the life of the Plan and the development of individual proposals, ensuring parent carers are involved in the design of provision their children will use.

The needs of young carers will be considered in transition planning for any individual provision proposal.

6.13 Looked after children, Care Leavers, Care and fostering experienced people:

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections).

Also consider our [Corporate Parenting Responsibility](#) in connection to your activity.

YES

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

SEND is significantly over-represented among care-experienced children and Looked After Children, who are also more likely to experience SEMH needs and to be at risk of exclusion. This group is therefore disproportionately likely to benefit from the provision the Plan creates, including the expansion of Inclusion Intervention Spaces and the continued specialist SEMH provision at the Central Hub Brighton.

Stability and continuity of education are particularly important for this group, and increasing local provision reduces the risk of placement breakdown associated with distant or unsuitable provision. The impact is assessed as positive.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The Virtual School Head will be engaged in the planning and prioritisation of provision and in transition planning for individual care-experienced children moving into new provision.

Personal Education Plans (PEPs) will reflect any changes in provision for individual care-experienced children.

6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)

NO

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate adverse impact has been identified. Families in insecure housing may move more frequently and can find continuity of SEND provision harder to maintain; the increase in local provision and the reduction in reliance on distant placements may support greater stability for these families.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The needs of children in insecure housing will be considered through safeguarding and pastoral channels in transition planning for individual proposals.

6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?

NO

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate adverse impact has been identified. The Plan does not alter safeguarding arrangements. Children affected by domestic abuse are more likely to present with SEMH needs and may benefit from the provision the Plan supports.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

Safeguarding considerations will be embedded in the design and operation of all new and changed provision, and addressed in the project-level EIA for each proposal.

6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)

YES

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

SEND and socio-economic disadvantage frequently co-occur, and families experiencing disadvantage are less able to absorb the costs and logistical demands of distant out-of-area placements. The rising cost of out-of-city placements (up approximately £1 million over three years) also places pressure on the High Needs Block, with consequences for the resources available to support all children with SEND.

By creating local provision and reducing reliance on higher-cost distant placements, the Plan is expected to benefit disadvantaged families disproportionately (in a positive sense) and to make more effective use of the High Needs Block. The impact is assessed as positive.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The Council will monitor access to new provision to ensure disadvantaged children benefit equitably.

Home to School Transport assistance will continue to be available to eligible families, mitigating travel costs for those on low incomes.

6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?

NO

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The Plan engages the right to education (Article 2 of Protocol 1, ECHR) and, in supporting access to appropriate provision, advances rather than restricts that right. The Plan is consistent with the United Nations Convention on the Rights of the Child, in particular the right of children

to express their views (Article 12) and the best interests of the child (Article 3), reflected in the engagement of the SEND Youth Forum.

No adverse human rights impact has been identified.

6.18 Cumulative, multiple [intersectional](#), and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.
- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
 - People being housebound due to disabilities or disabling circumstances
 - Environmental barriers or mobility barriers impacting those with sight loss, D/deafness, sensory requirements, neurodivergence, various complex disabilities
 - People experiencing homelessness
 - People on a low income and people living in the most deprived areas
 - People facing literacy, numeracy and/or digital barriers
 - Lone parents
 - People with experience of or living with addiction and/ or a substance use disorder (SUD)
 - Sex workers
 - Ex-offenders and people with unrelated convictions
 - People who have experienced female genital mutilation (FGM)
 - People who have experienced human trafficking or modern slavery

Many children and young people with SEND experience more than one of the characteristics and circumstances considered above. The strategic decision to plan provision now — in anticipation of national reform and ahead of immediate demand pressures — is intended to benefit children with the most complex and intersecting needs, who are currently the most likely to be placed out of area or to have their needs unmet locally.

Two intersectional risk areas are of particular note. First, SEND and socio-economic deprivation intersect significantly: children from more deprived backgrounds are more likely to have their SEND needs identified at a later stage and may face greater barriers to accessing specialist provision, particularly where provision is distant or requires complex transport arrangements. The creation of local provision is expected to benefit this group disproportionately, but the Council must actively monitor whether uptake of new provision reflects the wider SEND population or concentrates in less deprived groups.

Secondly, SEND and ethnicity intersect in complex ways: national evidence points to differences in identification rates across ethnic groups and in the types of need identified, and some communities face greater barriers to EHCP assessment and to engaging with SEND processes. The Plan's strengthening of early identification, OAIP and the mainstream offer is intended to reduce these disparities, but this cannot be assumed and must be evidenced. The Council will

therefore monitor access to new provision by ethnicity and socio-economic disadvantage as a specific equalities duty.

The principal cumulative risk is not in the strategy itself but in implementation: that a phased, multi-year programme of new provision could, if poorly sequenced or communicated, leave some children with complex intersecting needs without suitable provision in the interim, or could create temporary inequity between those who can access new provision early and those who must wait. The use of independent and non-maintained provision in the interim, and the lead times of two to three years for new provision, make careful sequencing essential.

There is also a strategic risk attached to the changes at the Central Hub Brighton and the wider move away from large standalone Pupil Referral Units: children with SEMH needs are among the most vulnerable, and any transition in this provision must be managed so that no child loses access to suitable support during the change.

To mitigate this risk, the following specific measures are in place:

- A dedicated transition plan will be developed for the Central Hub Brighton covering the leadership model changes and any site changes proposed for 2026/2027, setting out how continuity of provision will be maintained for every child currently on roll.
- Individual children's support arrangements will be reviewed and confirmed before any site or leadership change takes effect, with the responsible SEND case officer and the child's family notified in advance.
- The Management Committee of the Central Hub Brighton, which includes Council officer and school representation, will maintain oversight of the transition and will report progress to the SEN Sufficiency Workstream.
- An Equality Impact Assessment will be completed in relation to any formal staffing or structural changes at the Central Hub Brighton before those changes are implemented.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The SEN Sufficiency Workstream, with PaCC and partner representation, will maintain a strategic, intersectional view of need across the life of the Plan and will oversee the sequencing of provision so that the most complex needs are prioritised.

Each individual provision proposal will carry its own Equality Impact Assessment, which will assess intersectional impacts at the level of the specific children and communities affected, including transition arrangements for children moving from existing to new provision.

The changes will be managed so that any individual child's support is maintained through leadership transition at any site change.

Progress against the Plan, including the equitable distribution of its benefits, will be reviewed annually and reported through the Directorate's governance arrangements.

7. Action planning

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

SMART Action 1 — Equality Impact Assessment for each individual proposal

- A full, project-level Equality Impact Assessment will be completed for each individual provision proposal arising from the Plan — including each of the three Autism Resource Units, the further IIS expansion, and the changes at the Central Hub Brighton.
- Each EIA will be initiated at the outset of the statutory or engagement process for the relevant proposal, and will be completed and approved before any decision is taken.
- On the current programme: ARU proposals at Patcham High School and Cardinal Newman Catholic School — EIAs to be completed by autumn 2026; Stanford Junior ARU — EIA to be completed by spring 2027; Central Hub Brighton changes — EIA to be completed prior to any structural change, targeted by summer 2026.
- Each EIA will assess the detailed and intersectional impacts on the specific children and communities affected.

SMART Action 2 — Sequencing and prioritisation of provision and monitoring equitable access to any new provision

- Th
- The SEN Sufficiency Workstream will maintain and review, at least annually (by September each year, aligned to the annual SEND data refresh), a sequencing plan for the provision programme that prioritises children with the most complex and intersecting needs and minimises the period for which any child is without suitable local provision. The SEN Sufficiency Workstream is responsible for this action and will report progress to the Directorate Leadership Team annually.
- The sequencing plan will be informed by the annual data refresh.
- Access to new and expanded provision will be monitored by protected characteristic (in particular sex/gender and ethnicity, and by socio-economic disadvantage and care-experienced status) to ensure the benefits of the Plan are shared equitably.
- This monitoring is the responsibility of the SEN Sufficiency Workstream. Success will be measured by: the proportion of new provision places taken up by children from BAME backgrounds, disadvantaged backgrounds and care-experienced backgrounds reflecting, at minimum, their representation in the local SEND population; no statistically significant gap in access to new provision by ethnicity or socio-economic status emerging over the life of the Plan.
- A cause for concern (requiring escalation to the Directorate Leadership Team) would be if the proportion of new places taken up by any of the monitored groups falls more than 10

percentage points below their share of the SEND cohort for two consecutive annual reviews.

-
- Findings will be reported through the Directorate's governance arrangements.

SMART Action 3 — Accessible engagement and communications

- Engagement and communication on the Plan and on each individual proposal will be accessible to all affected groups.
- Materials will be provided in accessible formats and community languages, with translation and interpreting on request, and the views of children and young people with SEND will be actively sought.
- Feedback gathered from PaCC and other recognised representative bodies, through ongoing engagement, will be used as a qualitative monitoring tool to assess how the Plan is being received and whether its intentions are being realised in practice. This feedback will be reported to the SEN Sufficiency Workstream at least twice yearly and will inform the annual review of this EIA. The SEN Sufficiency Workstream is responsible for collating and reporting this feedback. A minimum standard for this action is that structured feedback from PaCC and Amaze is obtained and reviewed at least once in each 12-month period from the date of Cabinet approval of the Plan.

Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

The actions in this EIA will be transferred to the SEN Sufficiency Workstream action log, the SEN Statutory Service Plan, and the Directorate Fair and Inclusive Action Plan (FIAP) for monitoring. Progress will be reported to the relevant Head of Service and to the EDI Team as part of FIAP performance reporting. The EDI Team will be notified and this EIA will be logged on the Directorate EIA Tracker.

8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	X

Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.

If your decision is to “Proceed with caution”, please provide a reasoning for this:

The SEND Sufficiency Plan 2026–2029 is assessed as having a positive overall equalities impact. Its central purpose — to secure sufficient, appropriate and local provision for children and young people with SEND — directly advances equality of opportunity for the group that is its principal beneficiary, and supports the Council in meeting its Section 14 duty and the public sector equality duty.

The adverse impacts identified in this assessment relate principally to the implementation of the strategy rather than to its direction: the sequencing of a multi-year programme, the under-identification of autism in girls, and the equitable distribution of the Plan's benefits across all communities. These are capable of substantial mitigation through the actions set out above and through the individual, project-level Equality Impact Assessments that will accompany each statutory proposal.

The decision to plan now, in anticipation of national SEND and AP reform, rather than to wait for the reforms to be legislated, is considered proportionate given the immediacy of local demand pressures, the long lead times for new provision, and the risk of falling behind the national reform trajectory and missing capital funding opportunities tied to clear local plans.

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

The Equality Impact Assessment for the SEND Sufficiency Plan 2026–2029 concludes that the Plan has a positive overall equalities impact, by enabling more children and young people with SEND to access appropriate provision close to home, reducing reliance on out-of-area placements, and making explicit the Council's commitments under the Principles of Belonging and the Ordinarily Available Inclusive Practice guidance.

The assessment identifies a number of implementation risks — principally around the sequencing of new provision, the management of the Central Hub Brighton transition, the under-identification of autism in girls, and the equitable distribution of benefits — and sets out three SMART actions to mitigate them. Critically, each individual provision proposal arising from the Plan, including the three proposed Autism Resource Units, will be the subject of its own statutory process and its own full Equality Impact Assessment before any decision is taken.

Members are asked to have due regard to the equality impacts identified in this assessment, and to the mitigating actions proposed, when reaching their decision

9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Rhianned Hughes, Head of SEN Statutory Service	
Accountable Manager:	Georgina Clarke-Green, Director Education and Learning	

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

EDI Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Officer has considered the equalities impact to provide approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service, Business Improvement Manager, [Equalities inbox](#), any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing. Budget and Staffing EIAs secure approval via different templates.

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:		
EDI Manager:	Lindsey Pearce	

Notes and recommendations from EDI Business Partner reviewing this assessment:

Notes and recommendations (if any) from EDI Manager reviewing this assessment:

Special Educational Needs and Disabilities

Glossary of Acronyms

(June 2026)

Acronym	Meaning	Description
AP	Alternative Provision	Education provided for children and young people who are unable to attend mainstream school due to exclusion, medical needs, anxiety-based non-attendance, or other circumstances. Alternative Provision aims to maintain engagement in learning and support pupils to achieve positive educational and life outcomes.
ASC	Autism Spectrum Condition	ASC is a lifelong neurodevelopmental condition that affects how a person experiences and interacts with the world. Autistic children and young people may have differences in communication, social interaction, sensory processing and flexibility of thinking, and may benefit from adjustments and support to help them access learning, participate fully and achieve positive outcomes.
BHISS	Brighton & Hove Inclusion Support Service	Brighton & Hove's specialist inclusion support service (led by BHCC's Principal Educational Psychologist), providing advice assessment and outreach support to schools, settings and families. BHISS will also be coordinating the Experts at Hand (EAH) Team Around the Setting model, bringing specialist expertise into education settings to strengthen inclusive practice, support early intervention and help meet children's needs as close to their local community as possible.
CoP	SEND Code of Practice (2015)	The SEND Code of Practice is the statutory guidance that sets out how organisations should identify, assess and support children and young people with Special Educational Needs and Disabilities from birth to age 25. It provides the legal framework for education, health and care services, including expectations around inclusion, early intervention, co-production and Education, Health and Care Plans (EHCPs).
CLT	Corporate Leadership Team	The Council's most senior officer leadership group. CLT provides strategic oversight, ensures delivery of corporate priorities, and monitors progress and risks associated with major programmes such as SEND Reform.
DfE	Department for Education	The UK Government department responsible for education and children's services.
DLT	Directorate Leadership Team	The Directorate Leadership Team is the senior leadership group responsible for strategic direction, performance and decision-making within a Council directorate. DLT oversees the delivery of key priorities, manages risks and resources, and provides leadership and accountability for major programmes, including the implementation of the Local SEND Reform Plan.
EAH	Experts at Hand	A key national SEND Reform initiative designed to give schools and settings faster access to specialist advice and expertise. This includes support from Educational Psychologists, Speech and Language

		Therapists, Occupational Therapists and Specialist Teachers to help meet needs earlier and reduce reliance on statutory processes
EBSA	Emotionally Based School Avoidance	EBSA describes difficulties attending school that are primarily driven by emotional factors such as anxiety, fear, distress or feeling overwhelmed. Children and young people experiencing EBSA often want to attend education but may find school attendance difficult due to unmet needs or barriers to engagement.
EHCP	Education, Health and Care Plan	A legal document for children and young people with the most complex SEND. EHCPs bring together education, health and care support, setting out the provision required to help a child or young person achieve agreed outcomes.
EP	Educational Psychologist	A specialist professional who supports understanding of learning, development, behaviour and emotional wellbeing. Educational Psychologists work with families, schools and services to identify barriers to learning and recommend effective support strategies.
ICB	Integrated Care Board	The NHS organisation responsible for planning and commissioning health services across Sussex. The ICB is a key partner in SEND Reform, helping to ensure health services contribute to improved outcomes for children and young people with SEND.
LA	Local Authority	In this context, Brighton & Hove City Council. The Local Authority has statutory responsibilities for SEND, including education provision, EHCP processes, strategic planning and partnership working with education, health and care services.
OAIP	Ordinarily Available Inclusive Practice	Brighton & Hove's co-produced guidance describing the support and inclusive practice that should be routinely (Universally) available in all schools and settings without requiring an EHCP. OAIP aims to improve consistency, inclusion and early support across the city.
ND	Neurodiversity	ND is the concept of differences in how people think, learn, process information and experience the world are a natural part of human variation. The term recognises and values a range of neurodevelopmental differences, including autism, ADHD, dyslexia, dyspraxia and other ways of thinking and learning, and promotes inclusive environments that enable individuals to thrive.
NHS	National Health Service	The publicly funded healthcare system across the UK. NHS services play an important role in assessing, supporting and improving outcomes for children and young people with SEND and their families.
OT	Occupational Therapist	A specialist who supports children and young people to develop independence and participate successfully in everyday activities. This may include support with sensory processing, motor skills, self-care and access to learning environments.
SalT	Speech and Language Therapy / Therapist	Specialists who assess and support speech, language and communication needs. Their work helps children and young people to communicate effectively, access learning and develop social relationships.

SEMH	Social, Emotional and Mental Health	SEMH refers to difficulties that affect a child or young person's emotional wellbeing, relationships, behaviour and ability to engage in learning. These needs may be long-term or temporary and can impact attendance, participation, attainment and overall wellbeing.
SEND	Special Educational Needs and Disabilities	A term used to describe children and young people who need additional support because they have a learning difficulty, disability or developmental need that affects their ability to access education in the same way as their peers.
SRO	Senior Responsible Officer	The senior leader accountable for overall delivery of the Local SEND Reform Plan. The SRO provides strategic leadership; ensures governance requirements are met and is answerable for programme outcomes.
DSG	Dedicated Schools Grant	Government funding provided to local authorities to support education services. The High Needs Block of the DSG funds provision and support for children and young people with SEND and those requiring Alternative Provision.
NEET	Not in Education, Employment or Training	A measure used nationally to identify young people who are not participating in education, employment or training. Reducing NEET levels is an important indicator of successful preparation for adulthood and positive post-16 outcomes.
MAT	Multi-Academy Trust	A group of academies operating under a single governance and leadership structure. MATs are important strategic partners in delivering inclusive practice and implementing SEND Reform across education settings.
PCF	Parent Carer Forum	A representative organisation that brings together the voices of parents and carers of children and young people with SEND. In Brighton & Hove, PaCC and Amaze are key partners supporting co-production and influencing service improvement.
TAFG	Task & Finish Group	A multi-agency group established to develop specific aspects of the SEND Reform Plan. TAFGs bring together professionals, parent/carers representatives and other stakeholders to co-produce proposals, oversee implementation and monitor progress.

Brighton & Hove City Council

People Overview & Scrutiny

Agenda Item 13

Subject: Antisocial Behaviour in Social Housing Task & Finish Group Report

Date of meeting: 14th July 2026

Report of: Chair of People Overview & Scrutiny

Contact Officer: Name: Luke Proudfoot
Email: luke.proudfoot@brighton-hove.gov.uk

Ward(s) affected:

Key Decision: No

1. Purpose of the report and policy context

- 1.1 This report presents the final report of the Antisocial Behaviour in Social Housing Task & Finish Group to the People Overview & Scrutiny Committee and seeks approval from committee to send this to Cabinet for consideration.

2. Recommendations

- 2.1 People Overview & Scrutiny notes the Antisocial Behaviour in Social Housing Task & Finish Group Report attached as Appendix 1; and
- 2.2 Refers the findings of the Task & Finish Group Report on Antisocial Behaviour in Social Housing to Cabinet for consideration

3. Context and background information

- 3.1 The Antisocial Behaviour in Social Housing Task & Finish Group (TFG) was set up by the People Overview & Scrutiny committee in July 2025 to investigate how Brighton & Hove City Council and local housing associations deal with reports of antisocial behaviour.
- 3.2 The Task & Finish Group consisted of Cllr Jackie O'Quinn (Chair, until 13th Feb 2026), Cllr Milla Gauge, Cllr Julie Cattell, Cllr Ellen Mcleay, Cllr Bridget Fishleigh, and Angela Stretton (Older People's Council representative).
- 3.3 The aim of the TFG was - having reviewed best practice - to identify whether any changes to the council's arrangements might be made to improve the lives of residents that are affected by antisocial behaviour in the city's social housing.
- 3.4 The TFG carried out eight meetings with a range of internal and external stakeholders to gather evidence that has been used to form the

recommendations that the TFG are putting forward to Cabinet for consideration.

3.5 These meetings were held with:

Meeting one

- Brighton & Hove City Council. Harry Williams - Director of Housing People Services, Justine Harris - Head of Tenancy Services, and Janet Dowdell - Tenancy Services Operations Manager

Meeting two

- Cities of Westminster Council. Rochelle Largan - ASB Service Manager
- Portsmouth City Council. Lee Hickman - ASB Manager
- Derby Homes (Arm's Length Management Organisation of Derby City Council). Nick Bale - Anti-Social Behaviour Manager

Meeting three

- Guinness Partnership. Vicky Weir - Safe Neighbourhoods Manager South Region
- BHT Sussex. David Chaffey - Chief Executive and Paul Fagen - Head of Housing
- Hyde Housing. Craig Kendall - ASB Service Manager

Meeting four

- Moat. Kerrie Jenkins - Tenancy Specialist Manager
- Southdown. Jim Aspdin - Director of Housing & Assets

Meeting five

- Sussex Police. T/Inspector Emma Gee - ASB lead Brighton Neighbourhood Police Team and Steve Parker - ASB & Hate Crime coordinator
- Office of Rt Hon Peter Kyle MP. Domino Moore and Matilda Crawley

Meeting six

- Four anonymous resident witnesses from across the city

Meeting seven

- Brighton & Hove City Council. Harry Williams - Director of Housing People Services, Justine Harris - Head of Tenancy Services, and John Evans – Housing Manager

Meeting eight

- Brighton & Hove City Council. Victoria Paling, BHCC Customer Experience Lead, Richard Tuset, BHCC Director of Commissioning and Communities, Siobhan Bowstock, BHCC Senior Community Safety Caseworker, Brent Schwarz, BHCC Head of Health & Safety Wellbeing.

3.6 The minutes of the meetings are included as part of the TFG's report, except for meeting six. The minutes of this meeting were circulated to the members of the TFG but are not being shared as part of the TFG's report to protect the identities of the witnesses and anyone mentioned in their evidence.

3.7 Following the gathering of evidence the TFG have put forward the following recommendations as part of its final report:

1. A review of the allocations policy
2. Improving communications with complaints
3. Improving expectation management
4. Publicising work to deal with ASB
5. Improve process for sharing information about tenant ASB across all relevant departments including the police
6. Increased investment and improved training
7. Introduction of live-in caretakers/concierge in high rise blocks
8. Review of deployment and use of CCTV in BHCC-owned Housing Blocks
9. Lobbying for the introduction of a specialised housing court
10. Exploring the use of technology to record evidence and report ASB
11. Exploring the use of expert witness services
12. Ensure local Housing Associations are aware of information required for noise diaries, to avoid duplication
13. Strengthening the Response to Racism-Related ASB in Housing
14. BHCC should adopt and communicate a clear, proactive, and zero tolerance approach to discrimination within ASB casework
15. Review of the Client of Concern Register
16. Improving the use of language in complaints communications

3.8 The details and reasoning for these recommendations and the supporting evidence for them is included in the TFG final report at Appendix 1.

4. Analysis and consideration of alternative options

4.1 Having noted this report, the People Overview & Scrutiny Committee could choose not to refer the findings of the TFG report to Cabinet.

5. Community engagement and consultation

5.1 Public engagement was carried out as part of the Task & Finish Group's investigation via witness interviews, which are detailed in the final report at Appendix 1. The TFG included a representative from the Older People's Council, which represents older people in the city.

6. Financial implications

- 6.1 No financial implications arising from this information report.

Name of finance officer consulted: Ishemupenyu Chagonda Date consulted: 02/03/2026

7. Legal implications

- 7.1 The proposal that this Overview & Scrutiny Committee simply note this Report and refer it (pursuant to the powers available to it) to Cabinet for its consideration is not considered to give rise to any legal implications.

Name of lawyer consulted: Victoria Simpson Date consulted 04/03/26

8. Risk implications

- 8.1 Maintaining the status quo would mean resource continues to be directed toward current arrangements which possibly aren't as effective as they might be in tackling the issues. This could result in inefficient use of public funds where issues are ongoing - and increased risk of future payouts following complaints to the Ombudsman, as well as the ongoing (non-financial) cost to those suffering as a result of ASB issues which might be better dealt with.

9. Equalities implications

- 9.1 None specifically for this scrutiny report.

10. Sustainability implications

- 10.1 None specially for this scrutiny report.

10. Health and Wellbeing Implications:

- 10.1 None specifically for this scrutiny report. The health and wellbeing of both victims of antisocial behaviour and of alleged perpetrators was considered throughout the investigation and is mentioned in the final report at Appendix 1.

Other Implications

11. Procurement implications

- 11.1 None specially for this scrutiny report.

12. Crime & disorder implications:

- 12.1 None specifically for this scrutiny report. Crime and disorder were a key theme of the Task & Finish Group's work focusing on antisocial behaviour within council owned homes and housing association homes.

13. Conclusion

- 13.1 This report and its appendices set out the work carried out by the Antisocial Behaviour in Social Housing Task & Finish Group and seeks the People Overview & Scrutiny Committee's approval to send the TFG's final report to Cabinet.

Supporting Documentation

1. Appendices

1. Antisocial Behaviour in Social Housing Task & Finish Group Final Report
2. Antisocial Behaviour in Social Housing Task & Finish Group Minutes of Evidence Gathering Sessions

Antisocial Behaviour in Social Housing Task & Finish Group Report
Reporting to Brighton & Hove City Council's People Overview & Scrutiny
Committee

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Chair's Foreword

Antisocial behaviour in social housing can have a profound and lasting impact on residents' wellbeing, feelings of safety, and sense of belonging within their communities. For many people, their home should be a place of refuge; when antisocial behaviour occurs nearby or within shared spaces, that sense of security can be deeply undermined. It was in recognition of this impact, and the concerns consistently raised by residents and councillors alike, that the People Overview & Scrutiny Committee established this Task & Finish Group.

Over the past months, the Task & Finish Group has undertaken a detailed and thorough examination of how antisocial behaviour in social housing is addressed across Brighton & Hove. We have drawn on a wide range of evidence, hearing directly from council officers, housing associations, the police, community safety teams, other local authorities, Members of Parliament's offices, and—most importantly—residents with lived experience of antisocial behaviour. I would like to thank everyone who gave their time to contribute openly and constructively to this work.

What quickly became clear is that while antisocial behaviour presents complex challenges, many of the frustrations experienced by residents stem not only from the behaviour itself, but from how cases are communicated, progressed, and resolved. Recurrent themes across our evidence included the importance of clear and regular communication, effective expectation setting, timely use of enforcement tools, and better partnership working between agencies. We also heard powerful and deeply troubling accounts of racism related antisocial behaviour, underscoring the need for a clearer, more proactive, and explicitly zero tolerance approach to racially motivated harassment within housing environments.

This report recognises that no single intervention will eliminate antisocial behaviour altogether. However, the recommendations set out here are practical, evidence based, and informed by best practice from across the sector. If implemented, they have the potential to significantly improve residents' experiences—ensuring people feel listened to, supported, and confident that concerns are being taken seriously, even when cases are complex or lengthy.

I am particularly grateful to the residents who shared their experiences with the group. Their testimony grounded our work in reality and served as a constant reminder that behind every case file is a person, family, or community affected day-to-day by these issues.

I'd like to thank Jackie O'Quinn for her work on this Task & Finish Group as its original Chair. I'd also like to thank the members of the group for their hard work over many months to gather the evidence for this report.

I commend this report and its recommendations to the Council, partnerships, and housing providers across the city. I hope it will act as a catalyst for continued improvement, stronger collaboration, and a renewed focus on putting residents at the heart of our collective response to antisocial behaviour.

Cllr Julie Cattell

Chair Antisocial Behaviour in Social Housing Task & Finish Group

Aims

This Task & Finish Group (TFG) was set up by the People Overview & Scrutiny committee to investigate how Brighton & Hove City Council and local housing associations deal with reports of antisocial behaviour. The aim of the TFG was to find best practice and recommend changes that can be made to improve the lives of city social housing residents who are affected by antisocial behaviour.

Introduction

The TFG was made up of Cllrs Jackie O'Quinn (Chair meetings one-five),¹ Julie Cattell (Chair from meeting six onwards), Milla Gauge, Ellen Mcleay and Bridget Fishleigh, and Angela Stretton (Older Peoples Council). Following Cllr O'Quinn leaving the TFG, Cllr Sam Parrott joined the group.

Antisocial behaviour is defined as 'behaviour by a person which causes, or is likely to cause, harassment, alarm or distress to persons not of the same household as the person' (Antisocial Behaviour Act 2003 and Police Reform and Social Responsibility Act 2011).

There are three main categories for antisocial behaviour, depending on how many people are affected:

1. Personal antisocial behaviour is when a person targets a specific individual or group.
2. Nuisance antisocial behaviour is when a person causes trouble, annoyance or suffering to a community.
3. Environmental antisocial behaviour is when a person's actions affect the wider environment, such as public spaces or buildings.

Under these headings antisocial behaviour falls into 13 different types:

- Vehicle abandoned

¹ Following Cllr O'Quinn's resignation from the Labour Group on BHCC on 13th February 2026, she ceased to be a member of the Task & Finish Group.

- Vehicle nuisance or inappropriate use
- Rowdy or inconsiderate behaviour
- Rowdy or nuisance neighbours
- Littering or drugs paraphernalia
- Animal problems
- Trespassing
- Nuisance calls
- Street drinking
- Activity relating to sex workers or sex working
- Nuisance calls
- Begging
- Misuse of fireworks

Council housing is housing that is owned by the local authority and is intended for those with the highest need. Councils have a duty to house those in need under housing law.

There are criteria that need to be met for those who are accepted for council housing. Each individual council will have its own allocation scheme with categories which people will need to fall into to be able to rent a council property. Brighton & Hove City Council makes clear that any council tenant committing antisocial behaviour is putting their tenancy at risk.

A Housing Association is a not-for-profit company which provides housing for those on low income or who need extra support. These will also have their own allocation criteria. Housing Associations also offer other types of housing options including shared ownership and low-cost ownership. Council houses tend to be cheaper to rent than Housing Association properties on average as housing associations tend to set their rents at either social or affordable rates.

Executive Summary

Causes of ASB in Social Housing

1. Typically, the most serious cases of ASB are caused by tenants with
 - Family issues/parenting
 - Alcohol and drug misuse including drug dealers
 - Mental/physical health issues
 - Lack of social skills and boundaries/chaotic behaviour.

Within BHCC's housing stock there is an increasing number of vulnerable and marginalised individuals who have personal issues which affect their conduct at home.

BHCC has a duty of care to these individuals regardless of their behaviour. Its goal is to seek to end ASB as quickly as possible, tackle the underlying issues, change their behaviour for the long-term and maintain the tenancy. Eviction or a closure order is the last, and least desirable, outcome.

2. There are also tenants who are not concerned about how their ASB or criminal activities negatively affects their neighbours, who are well aware of their rights and know that eviction is a last resort for BHCC/Housing Association.

Challenges

Antisocial behaviour in social housing can have significant impacts on the lives of other

residents, even if the behaviour is not directed at them. Particularly in blocks of flats the problem is increased by shared access to properties and communal areas such as corridors, car parks or gardens.

When residents are having to deal with antisocial behaviour, as described above, at or

around their home, they often feel that they cannot escape from it as the person whose behaviour is causing harm is a neighbour who they see regularly and who knows where they live. This may cause anxiety about reporting issues for fear of making the issue worse.

Anecdotally, councillors have reported being regularly contacted by residents about antisocial behaviour caused by their neighbours in housing association or council properties.

Residents reporting these issues are not just concerned about the antisocial behaviour itself but the way it is dealt with and the timeframe in which it is resolved. Residents are also concerned that the lettings team do not thoroughly check whether a new tenant is a suitable fit for the property, its location and neighbourhood. Examples were given of residents with ongoing drug and alcohol issues being placed near each other. "If you know that there is a drug problem in a block you don't put an addict in that block".

Residents also requested that where ASB has been an issue in a neighbouring property, that when tenants whose behaviour had been harming others leave, the homes are re-allocated to tenants with no history of ASB to prevent problems starting up again.

It is important to acknowledge that behaviour and the perceived and real level of threat is affected by the resident's life experience as well as by other characteristics, age, gender, sexuality, race and disability will all have a bearing on how ASB is perceived. A victim centred approach is essential when assessing what is and isn't ASB.

Key take-outs from TFG investigation

Neighbours of properties where ASB is ongoing and disruptive often feel like they are not heard and their welfare is not prioritised over the welfare of the person whose behaviour is causing them harm.

BHCC has a Complex Case team and has adopted a victim-first approach but effecting behavioural change by/in a tenant is often a time and labour-intensive process.

Actions taken by housing officers such as one-to-one visits, warning letters, and mediation prove to be successful in over 75% of reported ASB cases.

Less than 25% of cases managed by social landlords require more formal interventions or enforcement, likely because of the complexity of the case or the failure of actions mentioned above.

It is important to note that the role of BHCC is to provide housing to residents and incidents of ASB and criminal activity do not preclude someone from a home, under law. This can feel unfair to other residents.

The ability to evict residents is inhibited by the backlog at Court and the burden of evidence required. Good case work takes time; to get a case to court can take 12-18 months, including the time the housing provider can wait for a space in court for the case to be heard.

BHCC's Housing team, Lettings team, Environmental Services and the police sometimes work in silos with information about problem tenants often not shared in a single place. For example, when investigating a complaint about a resident Environmental Health do not necessarily check if the property is Social Housing and then report the outcome of investigations to BHCC or the Social Housing Provider.

Residents who are frustrated with BHCC's perceived lack of action often contact their Member of Parliament. However, this rarely results in a different outcome.

The developer of a site with social housing will choose the Housing Association with homes allocated to those on BHCC's waiting list. BHCC has little influence with how a Housing Association manages its tenants causing ASB.

Recommendations

Following the conclusion of evidence gathering the TFG agreed the following recommendations:

- Lettings Team and Allocations Policy
 - A review of the allocations policy to consider the availability of tenant history to the allocations team, people's future needs before they are tenants, addressing issues of people moving in with no community

connections by working with existing community groups to help with integration. This should also include considerations for properties where most recent tenants have disrupted neighbours to consider history of incoming tenants to ensure existing tenants are less likely to suffer ASB again. Tenants convicted of criminal activity related to drugs and theft to immediately have their tenancy reviewed. **Evidence:**

Testimony of tenants in the public engagement session included:

- Those who said that they were concerned about unsuitable tenants being placed in areas that would worsen their problems, for example those with drug addiction issues being moved into blocks or areas where drug dealing was common.
- Tenants also spoke about the number of new tenants moved into blocks with similar issues such as mental health or addiction problems, saying that they could rally round to support an individual or a small number of people, but not lots of people at once lead to a lack of community support for individuals.
- Another allocations issue raised by the tenants was that if a tenant whose behaviour was causing harm to others was moved on they found themselves with a similar person replacing them, meaning their issues began again.

- Improving communication with complainants
 - The importance of communication has come up repeatedly through the evidence gathering sessions of the TFG. If residents who report ASB are left with insufficient contact from BHCC/Housing Association, then they naturally assume nothing is happening and that they are being ignored. As the TFG have seen it can take many months to get a case ready for court and then many more to get it to court. It is essential that residents are updated regularly on their case at the agreed frequency and with the agreed method, even if little has happened, to show that they have not been forgotten. Suggestions to improve communications include: a flow chart provided to residents to explain processes and typical timeframes; following police attendance at tenant's home to address ASB, BHCC should distribute written letters to neighbouring properties within two days so neighbours know that BHCC is aware and addressing issues; BHCC's limited ability to effect change clearly outlined in all comms. **Evidence:** In the first meeting with Brighton & Hove City Council staff, Justine Harris, Head of Tenancy Services, said that she felt that personal contact with complainants was an area they felt that they could do better. In the same meeting Janet Dowdell, Tenancy Service Operations Manager, said that there had been issues around how often the council were in contact with people harmed by the behaviour of others.
- Improving expectation management setting with complainants

- Many residents will not know what can and cannot be done by their council or housing association landlord when dealing with ASB cases. It is therefore not unreasonable for those raising ASB cases to believe that certain things can be done easily, such as moving or evicting a person whose behaviour is causing harm, or for the case to progress quickly. It is therefore important during the initial contact for expectation management to set out what can and cannot be done, and the possible time constraints. This may help stop frustration building and complaints being made if complainants have a clear understanding of what to expect and when. **Evidence:** Rochelle Largan of Westminster City Council said that it was important at the beginning of a case to manage expectations and to give harmed people the knowledge and awareness of what officers do and how they do it, and to also make sure that they knew there was certain information about the person whose behaviour was causing harm that could not be shared.² Likewise, Lee Hickman of Portsmouth City Council said that at the beginning a complainant would be given an action plan with a clear plan and expectation.³ John Evans, Housing Manager of Brighton & Hove City Council, said that although they were getting better at it, that they could improve on expectation management and said that sometimes it is easy to forget that the processes of dealing with a case are not second nature to everyone like they are to a housing officer. He suggested a frequently asked question sheet could be included in the opening letter of a case to help set expectations and improve understanding.⁴
- Publicising work to show successes in dealing with ASB
 - Many councils, including some spoken to and others found via desktop research, publicise their successes in dealing with their residents who are found to have been committing antisocial behaviour and are evicted or convicted of a crime. This is done to both warn people whose behaviour is causing harm of the ultimate consequences of their actions and to show residents that reports of antisocial behaviour will be taken seriously and could lead to serious consequences. There is a need to be sensitive around such communications to ensure that areas are not used frequently or stereotyped. **Evidence:** Justine Harris said that they had identified outward communication to keep residents informed as something they want to improve.⁵

² Meeting two

³ Meeting two

⁴ Meeting six

⁵ Meeting one

- Improve process for sharing information about tenant ASB across all relevant departments including the police.
 - Timely information sharing between relevant council departments and agencies, such as the police, can lead to early interventions and better outcomes for all as it enables problems to be resolved before they escalate. **Evidence:** Inspector Emma Gee of Sussex Police said that early intervention and communication and information sharing could be improved and suggested a monthly meeting between police, Brighton & Hove City Council, and other social landlords, with tightly defined terms of reference, to discuss emerging issues and ways of working collaboratively to solve them quickly.⁶
- Increased investment and improved training
 - More resources to be allocated to the tenancy team; officers are overloaded with ASB cases which require regular communication with those suffering harm from the behaviour of others and those enacting the behaviour. Additional staffing resources would allow fewer cases to be held by each member of staff, allowing greater time to be spent on each case. This should be hand in hand with a review of the training provided for housing officers. With an increase in the vulnerability of tenants, it is important to know that officers are equipped with the correct training and knowledge to support tenants. It was also felt that officers should be trained to understand that discriminatory micro-aggressions that build up over time have severe impacts on those experiencing them.
- Introduction of live-in caretakers/concierge in high-rise blocks
 - Pilot project in which one property in a high-rise block with a history of tenants with ASB is allocated to a caretaker/concierge who is BHCC's permanent eyes and ears on the ground. This could be a current tenant of the block who has the necessary experience potentially provided with a discounted rate of rent as part of their pay. This could also follow the 'Timpson' model of employment to allow those who may have had a troubled past gain employment and experience.
- Review of deployment and use of CCTV in BHCC-owned Housing Blocks
 - CCTV often acts as a deterrent for some ASB. A pilot project to deploy, and actively monitor, CCTV to be implemented in an area of high ASB.

⁶ Meeting five

- Write to Brighton & Hove's Members of Parliament, the Secretary of State for Justice & Lord Chancellor, and the Local Government Association to lobby for the introduction of a specialised housing court
 - The witnesses that were spoken to were overwhelmingly in favour of having a specialised court to deal with housing issues, along the lines of the family court. Not only would this reduce the time to take those whose behaviour causes harm to court for antisocial behaviour, but it would also ensure that the judges presiding over the cases are experts in housing law. **Evidence:** Janet Dowdell said that casework can take between 12-18 months and that there was increased pressure on courts.⁷ Rochelle Largan, ASB Service Manager Westminster City Council, spoke of cases taking months to get to court, and Nick Bale, Anti-Social Behaviour Manager North Derby Homes, agreed with Rochelle and spoke of Resolve's campaign for a dedicated housing court to deal with delays.⁸ Vicky Weir, Safe Neighbourhoods Manager-South Region at Guinness Partnership, said "We need a dedicated court that will significantly shorten those time frames. It would be great if that time frame was closer to one to two months as opposed to nine to 11 months."⁹ Kerrie Jenkins, Tenancy Specialist Manager at Moat; Paul Fagen, Head of Housing at BHT Sussex; and Craig Kendall, ASB Service Manager at Hyde, all agreed with the need for a dedicated housing court.¹⁰
- Explore use of technology to record evidence such as the Noise App/ASB App
 - These include the Noise App¹¹ and the ASB App¹² provided by Case Management Solutions Ltd. The Noise App can be used to record audio evidence to be submitted to BHCC allowing a better understanding of the level of noise residents are experiencing as opposed to a written record on a paper diary sheet. Similarly, the ASB App allows quick reporting of ASB and the uploading of evidence such as photos, audio, and videos. The ASB App does also have a case management function, but Moat was one such landlord who chose not to use this function to allow greater compatibility with other areas of their organisation. Even if such technology was introduced, there must still be a way for tenants to reports ASB and communicate with housing officers without the need for apps or smart phones, such as telephone, email, or face-to-face. **Evidence:** Craig Kendall, ASB Service Manager at Hyde, and Kerrie Jenkins, Tenancy Specialist Manager at Moat, said

⁷ Meeting one

⁸ Meeting Two

⁹ Meeting three

¹⁰ Meeting four

¹¹ <https://thenoiseapp.com/features>

¹² <https://cmsg.uk.com/solutions/asb-app>

that they and others were making use of technology to aid the reporting of ASB, the recording of evidence, and case management using apps.¹³

- Explore use of Expert Witness Service
 - The Expert Witness Service by Case Management Solutions Ltd is used to provide an impartial and expert witness to ASB cases. These experts will go to a resident's home and sit with them at times of expected ASB to record evidence. These experts are impartial and see for themselves the level of ASB being experienced and will record evidence to be used by the landlord if needed. **Evidence:** Craig Kendall, ASB Service Manager at Hyde, told the TFG that they only use the service when they feel it is necessary, whilst this has a cost attached it is felt to be worth the cost.¹⁴
- Ensure local Housing Associations are aware of information required for noise diaries, to avoid duplication
 - Ensure that when residents are asked to complete noise diaries every housing provider in the city is using a standardised form this will ensure that residents are not being asked to complete diaries multiple times. It is clear that some housing associations are not ensuring that data collected is up to an evidential standard. BHCC Environmental Health have confirmed that they will accept noise diaries from housing associations provided they contain the detailed information required for a statutory investigation. There is currently no formal framework between local housing associations and BHCC on this issue, which could be set up to improve collaborative working. **Evidence:** Vicky Weir, Safe Neighbourhoods Manager- South Region at Guinness Partnership, spoke about an agreement that they have made with Cheshire East Council whereby the local authority will accept noise diaries from Guinness residents.¹⁵ This will speed up the process for residents and provide a better and streamlined service for them.
- Strengthening the Response to Racism-Related ASB in Housing
 - Resident accounts¹⁶ indicate a pattern of increasingly overt and persistent racist behaviour within some housing blocks. These include coordinated harassment by small groups, intertwined with racial abuse, and repeated intimidation of both residents and frontline staff (security guard placed in one tower block). The examples shared illustrate how

¹³ Meetings three and four

¹⁴ Meeting three

¹⁵ Meeting three

¹⁶ Public engagement written submission from a resident invited to the session but unable to attend.

racist perpetrators adapt their behaviour, exploit cultural nuances, and use sustained low-level actions that are difficult to evidence but over time are deeply harmful (micro aggressions that build up in severity). By adopting a structured and culturally informed approach, BHCC can prevent further escalation of racist behaviours, protect minority residents and frontline staff, and begin rebuilding trust and cohesion within affected communities. Concerning themes include:

- **Cumulative, nuanced racist behaviours** that build over time, making victims feel isolated, unsafe, and “terrible,” while also eroding trust in the council’s ability to protect them.
 - **Targeted harassment of minority residents and staff**, including racial slurs, intimidation, and behaviour severe enough to reduce staff members to tears.
 - **Breakdown of social cohesion** in tower blocks, where bystanders avoid intervening out of fear or fatigue.
 - **Escalation when racism goes unchallenged**, emboldening perpetrators – mirroring broader social patterns where unchecked racism grows more visible and aggressive.
 - **Displacement of victims**, including residents forced to move due to racist neighbours or threats of violence.
 - **Complications linked with criminal activity**, including residents engaged in drug dealing who return to the same behaviours immediately after enforcement action, creating fear and undermining confidence in reporting.
- BHCC should adopt and communicate a clear, proactive, and zero tolerance approach to discrimination within ASB casework.
 - Should this approach already be taken then a review should be undertaken of how it is upheld and a consideration if the procedures for dealing with discrimination in ASB casework is fit for purpose.
 - Review of the Client of Concern Register
 - Members were pleased to hear from Brent Schwarz, Head of Health & Safety at Brighton and Hove City Council, that the use of the Client of Concern Register is being reviewed and support this review.
 - Improving the use of language in complaints communications
 - Having spoken to Victoria Paling, Customer Experience Lead at Brighton & Hove City Council, members understand that complaints at all stages need to follow certain guidelines and use specific phrases when communicating with tenants. However, this language is often impersonal and leaves complainants feeling unheard. The TFG would recommend that as well as using the necessary wording in responding to complaints

that more personal language is used to show that complaints are being listened to and the impact of the issue, and how it has been dealt with, on them is acknowledged.

Evidence Gathering Sessions

Meeting One: BHCC

The first meeting of the TFG was with housing staff from Brighton & Hove City Council to enable the group to have a baseline to understand the current aims and policies of the council. This enabled the group to compare what BHCC are doing with the work of other councils.

In this meeting the TFG met with:

- Harry Williams, Director of Housing People Services
- Justine Harris, Head of Tenancy Services
- Janet Dowdell, Tenancy Service Operations Manager

Evidence gathered in this meeting included Justine Harris saying that that they had identified outward communication to keep residents informed was something they wanted to improve. This has been incorporated into a recommendation to increase the council's work in publicising success stories in dealing with ASB. The TFG also heard Janet Dowdell speaking about the length of time that it takes to get cases to court, which has been incorporated into a recommendation to lobby for the creation of a specialist housing court to deal with the backlog of cases.

Meeting Two: Other councils

During this meeting the TFG met with other local authorities who were chosen for their high Tenancy Satisfaction Measures scorings for both overall tenant satisfaction and tenant satisfaction in dealing with antisocial behaviour. The councils were also filtered down to ensure that they had a similar sized housing stock to Brighton & Hove City Council, as it was felt the issues faced by councils with a much smaller or a much larger housing stock would be too different to be comparable. The TFG met with:

- Cities of Westminster Council. Rochelle Largan – ASB Service Manager
- Portsmouth City Council. Lee Hickman ASB Manager
- Derby Homes (ALMO of Derby City Council). Nick Bale – Anti-Social Behaviour Manager North

In this meeting the TFG heard of the ways that other local authorities deal with ASB, including the structure of their teams and their policies. The TFG also heard that local authorities across the country are experiencing the same problems and delays in trying to get cases to court, which provided further evidence to support calls for a specialist housing court.

Meetings Three & Four: Housing Associations

The TFG held two meetings with Housing Associations. All the housing associations in these meetings had a presence in Brighton & Hove, with most of them having large numbers of properties across the country. In these meetings the TFG spoke with:

Meeting Three

- Guinness Partnership. Vicky Weir - Safe Neighbourhoods Manager- South Region
- BHT Sussex. David Chaffey – Chief Executive and Paul Fagen - Head of Housing
- Hyde Housing. Craig Kendall – ASB Service Manager

Meeting Four

- Moat. Kerrie Jenkins - Tenancy Specialist Manager
- Southdown. Jim Aspdin - Director of Housing & Assets

The TFG heard about the different approaches that are taken by housing associations when dealing with ASB compared to local authorities. The TFG learnt of the use of technology by housing associations to allow residents to report, monitor and record ASB, which have formed recommendations to explore the costs and potential benefits of the use of these services. A piece of evidence that emerged, which could help housing association residents, is that Guinness Partnership have an agreement with East Cheshire Council in which the council will accept the noise diary sheets from Guinness when noise complaints are referred to the council, rather than asking residents to begin the process again. This has formed a recommendation to consider such agreements with local housing associations in Brighton & Hove.

Meeting Five: Other Agencies

It is not just housing officers at local authorities or housing associations who are dealing with antisocial behaviour in their properties. A proportion of the issues reported will be escalated to local authorities' community safety or environmental health teams, or to the police. Residents who feel that they are not getting progress

with their case, or a desired outcome may also feel the need to contact their Member of Parliament for assistance.

In previous meetings the TFG had heard about the work that is done by council staff and housing association staff involving these other council departments or the police. The TFG therefore felt it important to hear from them about the challenges that they are facing in dealing with antisocial behaviour. A meeting of the TFG was held with:

- Sussex Police. T/Inspector Emma Gee, ASB lead Brighton Neighbourhood Police Team and Steve Parker ASB & Hate Crime coordinator.
- Office of Rt Hon Peter Kyle MP. Domino Moore and Matilda Crawley.

During this meeting the TFG heard about how Sussex Police are working to tackle ASB and how they work alongside housing associations and the council.

Staff from the office of local Member of Parliament, Rt Hon Peter Kyle MP (Hove & Portslade), told the group about their experiences of residents contacting them to seek advice and assistance from their MP to resolve their ongoing issues with ASB. This not only gave an insight into the effect that ASB can have on residents but also showed the barriers that residents are facing in being heard by their landlords and getting their issues resolved.

The police were keen to work with others from across the city to understand local issues and to resolve problems such as ASB quickly before they become too much of an issue.

Public Engagement

Members were clear from the beginning of the process that public engagement was going to be a key part of the TFG's work. The way that a council or housing association deals with antisocial behaviour will have a tangible impact on tenants that are suffering from antisocial behaviour.

The TFG therefore wanted to hear from residents who had suffered with antisocial behaviour, reported it to the council, and the case concluded. A decision was taken early on to not take any ongoing cases as evidence. The TFG did not have any power to involve itself in ongoing cases and it was felt that to take evidence from people with ongoing cases would unfairly raise resident expectations for a resolution and make the work of housing officers more difficult.

Residents were not sought to act as witnesses from Housing Associations, due to the complexities in finding appropriate witnesses.

The TFG spoke in person to four witnesses, all of whom were council tenants, from across the city. They each came in person to a meeting at Hove Town Hall where they individually gave evidence to and answered questions from the TFG members for around 25 minutes each. Due to the desire to keep these witnesses anonymous specific details of who they are and where they are from will not be included in this report, nor will the minutes of the meeting with them.

The meeting provided an excellent opportunity to hear from residents with lived experience of the issues being investigated. They were also able to speak about issues within their communities. Members took the opportunity to ask questions that had arisen from previous sessions.

Additional public engagement was carried out by the Housing team. A questionnaire was sent to all tenants who had a closed ASB case from within the last two years. They were asked a series of questions around their experiences of reporting and resolving the issues.

These two approaches provided a broad public engagement exercise collecting data via two methods and allowing participation from a wide range of residents.

Meeting Six: BHCC

A meeting was held to speak with officers from Brighton & Hove City Council to discuss issues that had arisen during the previous evidence gathering sessions. Witnesses included:

- Harry Williams, Director of Housing People Services
- Justine Harris, Head of Tenancy Services
- John Evans, Housing Manager

In this meeting members heard from John Evans about the work of neighbourhood officers in dealing with ASB and other issues within local communities, as well as being able to question Harry Williams and Justine Harris on some of the evidence that the TFG had gathered from previous meetings.

Meeting Seven: BHCC

Members wished to hold a final meeting to gather evidence from officers not directly in housing at BHCC but whose work was linked to that covered by the TFG. This included Richard Tusset, Director of Commissioning & Communities, and Siobhan Bostock, Senior Community Safety Caseworker. The aim speaking to them was to discuss how the Community Cohesion and the Community Safety team deal with ASB in private settings to see what could be learnt from them. The TFG also spoke

to Victoria Paling, Customer Experience Lead, regarding the council's complaints process, and Brent Schwarz, BHCC Head of Health & Safety and Building Services, regarding the council's Client of Concern Register. Witnesses included:

- Victoria Paling, BHCC Customer Experience Lead.
- Richard Tuset, Director of Commissioning & Communities, Siobhan Bostock Senior Community Safety Caseworker.
- Brent Schwarz, BHCC Head of Health & Safety and Building Services

During this meeting members heard about the council's complaint service and how they deal with cases that come from the housing team. The TFG heard from the community safety team about how they deal with ASB in the private sector and how they work alongside the complex case team dealing with ASB in council housing. Member were also told about how the Client of Concern Register is used and that it is being reviewed to ensure that it is used appropriately with the necessary safeguards in place.

Conclusions

Antisocial behaviour has a huge impact on those who suffer from it, particularly when it is persistent, targeted, or happening at their home which should be a place of safety. The TFG have heard details of how residents have been affected during the public engagement aspect of its inquiries, including people openly taking drugs, defecating, and urinating in communal areas of a block of flats; residents having to move house to get away from problem neighbours; and people using scaffolding to climb the sides of a block of flats.

Whilst no recommendations that the TFG can make could stop antisocial behaviour from happening, the TFG feel that the recommendations that have been made, if implemented, will be able to improve the service that is offered to residents at their time of need, ensuring that they feel supported and that they have an expectation of what can, and what cannot, be done to resolve their case.

Appendix

- Meeting Minutes (Public engagement excluded)

Antisocial Behaviour in Social Housing Task and Finish Group
Appendix to the report – Minutes of evidence gathering

Antisocial Behaviour in Social Housing Task and Finish Group Evidence Session
One

20th August 2025 16:30

Present: Cllrs O'Quinn, Gauge, Cattell, Mcleay, Fishleigh. Angela Stretton (OPC).

Witnesses: Harry Williams (Director of Housing People Services), Justine Harris (Head of Tenancy Services), and Janet Dowdell (Tenancy Services Operations Manager) all from Brighton & Hove City Council.

JOQ: Welcome everyone to this first evidence gathering session of this Task & Finish Group. Today we are hearing from our own council officers to find out about the current policies and procedures in place to tackle antisocial behaviour in council homes.

Joining us are Harry Williams (Director of Housing People Services), Justine Harris (Head of Tenancy Services), and Janet Dowdell (Tenancy Services Operations Manager). They have prepared a presentation for us and will then take questions. Although this meeting is in private, it is being recorded and minutes taken. These minutes may be used as part of our final report, which will go to committee and be sent to cabinet.

JH introduced the presentation and said that they had carried out a review of their policy in 2022 and a new policy was introduced in 2023. This was done with resident focus groups. She said that a lot of this had been implemented but some of it is still being embedded. She said that they were constantly learning and training particularly around their work with other agencies. One example of this given was multi agency meetings that were taking place in each area facilitated by area housing managers that involved PCSOs, housing officers, and mental health services may attend. She said that one thing identified that needed to be improved as the outward communication to keep residents informed and that this a resources issue. She said that they had spent a lot of time on training plans and becoming a trauma informed service to support victims.

JD presented to the group and said that as a social landlord they used a harms based approach considering the impacts on the victims and the community, putting people at the heart of what they do. She said that they recognised that individuals reacted differently to ASB depending on lived experience and vulnerabilities.

HW said that this was a change in approach as it was previously based on what a reasonable person would find acceptable but now we are considering the individual and considering the impact on them.

JD said that the team offered every victim or witness a risk assessment to establish the degree of risk based on what they are experience and to tailor the response. She said that the risk levels were low risk, medium risk or high risk and that this was regularly reviewed throughout the life of the case and could change. She said that this helped to identify vulnerable individuals who were at higher risk because of personal circumstances and allowed the team to put great support in for them. She said that cases can take many months to resolve and that victims were kept informed during this time and given a Single Point Of Contact (SPOC).

JOQ asked about victims wanting to move but not into emergency accommodation. JD said that they could sometimes offer placements outside of the city and that moving perpetrators required a lot of evidence.

JC asked how long court action would take. JD replied that good casework took a long time even without the backlog in courts, and could take 12 to 18 months.

HW said that part of their learning was how to communicate this and keep the community informed.

JD said that they worked closely with the police to deal with cuckooing using a red, amber, green system which saw people categorised as red being checked on daily. She said that this will lead to the closure of the property.

CG asked to see statistics on cuckooing and said that a Bill was currently going through Parliament which might lead to a change in approach to dealing with the issue. CG liked the idea of a victim lead approach. She also asked for equalities data on both victims and perpetrators.

JD said that they would look at perpetrator to understand that underlying issues to their behaviour and try to link them up with appropriate services such as mental health, drug or alcohol services. She said that some do not engage but it can be really successful. She said that some people in the community did not understand the support given to perpetrators, partly because they could not share the reasons with the community.

AS asked if there were any interventions in place for victims. JD said that they did offer them mediation and conflict resolution. JH added that they could also carry out practical measures like garden fencing or sound proofing to alleviate problems.

JD said that the majority of cases can be solved without court action. She said that courts expected certain things to be done or tried before they could take any action. She said that all tenants were protected under the Equalities Act and that an equalities checklist would be carried out. JD said that all actions need to be proportionate and therefore expectations were set at the start of the process to the victims outlining realistically what could and could not be done. The priority of the team was to stop the ASB and tackle its root causes. She said that they were not avoiding legal action but had to take a deliberate and measured approach to get there. She said that 75% of cases were dealt with without having to go to court, but if it were necessary then they would do so. Regarding domestic violence she said that managers attending a weekly MARAC (Multi-Agency Risk Assessment Conference) meeting with the police to discuss domestic abuse cases. She said that they also worked closely with environmental health on noise nuisance issues. JD said that a new Hate Incidents Policy was coming to the People Overview & Scrutiny Committee in October.

JD said that the team was currently seeing an increase in vulnerability and complexity of need, alongside reduced budgets and increased pressure on courts.

Following the presentation members asked questions of the witnesses.

JOQ asked why they thought that the satisfaction scores for dealing with ASB were so low. JD replied that it took too long to resolve cases and included issues around how often the council are in contact with victims, how much information can be shared with them, and that they do not publicise when they have taken someone to court and had them evicted. JH said that it was also about how people were left feeling afterwards. Once a case is resolved they are just left and not supported going forwards. JD clarified that closure of a property was different to eviction. Closure was the sealing of a property for 3 months (extendable by 3 months) meaning that no one could go in and that the council could take possession of it after. JH said that they had surveyed 1300 tenants. JD said that more resources in the tenancy team may help as officers may have 40 cases, with half of them being ASB cases that needed contacting regularly.

MG asked for stats on how long cases take to complete and if there were any targets. She asked for a break down in what was done in the 25% of cases that needed more formal intervention. She asked about hate incidents including gender. JH said that the draft Hate Incident Policy was coming to the committee in October and that could be explored there. She said that some councils do include 'lifestyle' in their hate incident policies but that as this did not align with the Home Office Brighton & Hove had not done so.

BF asked if the profile of individuals mattered as verbal abuse was verbal abuse regardless. JD said that it was important to know the demographics as they can see if particular communities are being targeted. She said that they do keep statistics on long cases and that the Ombudsman require a formal review of cases over 200 days old or those with no action for eight weeks to come up with ideas to resolve them. She said that there was no target time for resolving cases but that there were measures in place to stop case drift including case reviews with managers. She added that the 25% of cases needing more formal action do not take up all of the time but it is the ones that rumble on.

MG asked if they tell people that they can ask for a case review. JD replied that it was on the council's website and explained that it was carried out by officers from other authorities with the victim coming in to explain the impact on them. She added that people did use the option of a case review quite well.

JOQ asked where they could do better. JH replied that personal contact was where they felt they could do better.

JOQ asked if they worked with the community and voluntary sector. JH said that not they did not do so in a broad sense but might do on a case-by-case basis. JD added that they had worked with GPs on social prescribing. JH said that they had put in place a trauma service for the community.

JC asked if the team looked at councils with a much larger housing stock than us. HW said that they were aware of councils that they were bench marked against and really welcomed the idea of going out and seeing what else could be done.

JOQ thanked officers for attending and the enormous amount of work going into tackling antisocial behaviour.

Present: Cllrs Jackie O'Quinn, Mila Gauge, Julie Cattell, Ellen Mcleay, Bridget Fishleigh. Angela Stretten (Older People's Council), Richard Jordan-Penswick (Housing Manager).

Witnesses: Rochelle Largan – ASB Service Manager Westminster City Council, Nick Bale – Anti-Social Behaviour Manager North Derby Homes, Lee Hickman ASB Manager Portsmouth City Council.

JOQ opened the meeting and invited Rochelle Largan from Westminster City Council to speak to the group.

RL said that Westminster has a stock of around 24,000 homes across Westminster Borough and that is mixed tenure of leasehold to social housing tenants. She said that there were housing officers who deal more with tenancy management as opposed to the more complex cases that her team would deal with. Although currently recruiting she said that they had eight direct antisocial behaviour case officers, who each have a patch and at any given time have anything between 130 all the way up to about 180 antisocial behaviour cases between all of the case officers. She said that Westminster has a policy of looking at prevention and intervention as a first port of call, looking to be proactive rather than reactive.

RL said that they had over the last year they have been using quarterly reports to highlight what is coming in and where it is coming from. This will allow them to see comparisons as time goes on. They are wanting to use data in a better way, alongside other services, to be more proactive rather than reactive.

RL said that alongside the prevention and intervention they had a zero tolerance approach in terms of enforcement. She said that the most common tool used was injunctions as a way of prevention before more serious proceedings such as possession.

JOQ asked what a complex case would involve. RL said that these were cases where there are other factors that are impacting the people that are involved and that's both the complainant and perpetrator or alleged perpetrator including mental health, social care, domestic abuse, or involving children services. She said that officers needed to be curious about the causes of behaviour and what could be triggering it.

JOQ said that many victims can feel that the perpetrator is treated better than themselves and asked how she handled that kind of situation. RL said that it's a really horrible position for most victims in cases and typically that is quite a common feeling and response that Westminster also get. She thought it really important in all

cases, and particularly ones of a more complex nature, that when having those conversations with victims right at the beginning of the case, it is so important to manage their expectations. But also give them knowledge and awareness of what it is that officers do and how they do it. She said it can seem to victims that you're perhaps supporting their alleged perpetrator more than you're supporting them. There are ways around that and ways of explaining that. She thought it so important from the beginning that officers explain that they treat everyone fairly and there are some things that they need to consider that could help this person stop their behaviour. RL said that from the beginning it was important to tell victims that there would be certain things that couldn't be shared with them but that the main aim was to stop the behaviour, that the victim is not alone and should receive regular contact, but also that the alleged perpetrator would receive help and support to change their behaviour.

BF asked what enforcement measures Westminster used, how many people they evicted last year, and about work to ensure housing associations follow the same rules. RL responded that the most commonly used tools were injunctions with or without notice depending on the seriousness. She said they would look at without notice injunctions where there was a risk of physical harm or violence. She said that they utilise closure orders, the premises closure orders quite frequently actually where there is perhaps harm in a property being caused to the Community or where we've had somebody that's vulnerable, that's their property's been taken over and cuckooed we work with other services, particularly the police, in terms of community protection, warnings and notices. She said they would use possession as a last option, as the aim is never to evict somebody. RL said that their number of evictions was 11 possessions and some of those were ongoing as they were waiting for bailiff warrants, as these can take between five and 12 months to come through. RL said that they worked closely with the public protection and licensing team who deal with ASB outside of the housing stock. RL said that they recently started a housing compact where they were getting together all of the registered providers in the borough and nominating a lead for each of those specific areas. So for housing, for antisocial behaviour to make sure that those relationships are really strong. How they approach certain topics such as noise, cuckoo in hotspot areas in Westminster, and looking at sort of our procedures towards that.

JC asked about the use of injunctions, how quickly they can get them, how much it costs, how often they work. RL replied that last year they had got around 16 injunctions, some specific to people and a couple of estate wide injunctions where large areas were experiencing ASB but they could not identify individuals responsible. There were two types of injunction, with power of arrest and without, depending on the evidence that is put before the judge. She said that councils would need the support of the local police if getting a with power of arrest injunction as if the police didn't have the resources to carry out arrests it didn't work. In terms of cost

RL said that estate wide could be £9,000-£11,000 and individual could be £3,000 upwards. RL said that someone could still be taken to civil court for breaching an injunction, but this can take months to get to court.

AS asked if there was support for older people. RL said that Westminster had some sheltered schemes for over 50s and more elderly and vulnerable which had scheme managers who they regularly communicate with. She said that age and accessibility need was considered right from the beginning. She said they would also agree with people if they would prefer face to face visits or phone calls over things like email, taking into account the team's resources.

JOQ asked about the team's numbers and training. RL said that they have two managers and eight officers. She said that they were recruiting as it was a high turn over area. RL said that training ASB officers was difficult as people could be taught how to do things or the legislation but it was very different to actually doing it. She said Westminster were developing a new training programme and going back to the basics of case management principles. She said that they also looked at other training such as on dementia and that dementia could cause behaviour that might be perceived as ASB.

JOQ thanks Rochelle for her time and asked Nick Bale to present to the group.

NB said that he was one of two ASB managers at Derby Homes and that they were an arms length management organisation appointed by Derby City Council in 2002. He said that they had 12,500 properties. He said that Rochelle's experiences mirrored what in his view is happening across the country. He said that in 2014 they decided to establish a specialist ASB team, which he said was the only efficient and effective way to deliver the service in his over 20 years of experience. NB said that his team consisted of seven full time senior ASB officers, a full time ASB officer apprentice, and two admin staff. He said that the team average 150-180 cases at any time, which increases between June and September, peaking again in October and November. He said officers are each dealing with 30 to possibly 40 cases at any time. NB spoke of the close working relationship with areas of Derby City Council including the public protection team, community safety partnership, and also the police. NB said that the work had not got easier since the ASP crime and Policing Act 2014 came into force and agreed with Rochelle on the difficulties caused by delays in getting court hearings.

JOQ asked what recommendations he would make in terms of changes to legislation. NB said that Derby Homes was a member of Resolve, a national body representing local authorities, housing providers etcetera and police across the entire country providing a link to the Home Office. He said that he sits on one of their policy groups and has been advocating for a designated housing court to deal with

the issue of delays in getting court hearings. He said that they had a good working relationship with the local police but that they needed more resources to be able to increase neighbourhood teams.

BF asked about his work with Resolve. NB said that he couldn't share much of the work but could put the group in contact with the Chief Executive.

AS asked about support for victims. NB said that every case would be different but they were lucky to have access to a Police & Crime Commissioner funded victim support service which operates across the whole country. He said that they would offer this service to victims who could use it for as long as they needed it.

JOQ asked about the high number of cases per 1,000 properties alongside the high satisfaction rating, and how this was achieved. NB said that he did not see the relevance of the cases per 1000 statistic. He said that they survey when a case has concluded but said that the return rate will impact on the level as they wouldn't get a return for each concluded case. He said that the surveys were carried out in telephone call carried out by an independent person within Derby Homes.

EM spoke about communication and expectation setting being key. NB replied that it goes back to his point at the beginning of having a dedicated ASB team rather than housing officers dealing with ASB alongside their other work as although it costs more but in his experience was more effective. He said that all of his team were trained to BTEC level 5 in ASB case management.

JOQ thanked Nick and asked Lee Hickman to speak to the group.

LH said that Portsmouth have 17,500 properties within Portsmouth and Havant as well as in Fareham, Gosport and Winchester. He said that they had three housing offices to cover these. He said that they had 44 housing officers, which were generic roles including rental, income exchanges, voids, tenancy management and antisocial behaviour. LH said that tenants can report out social behaviour in person over the phone, by e-mail, by letter or online and that all contact was passed through the housing officer to manage this in a consistent approach. Similarly to Westminster and Derby Homes he said that the first instance was that a risk assessment was carried out to understand the impact. He said that a risk assessment may also be carried out on the accused to understand the level of support needed for them as well. He said that an action plan would be completed to give the complainant a clear plan and set expectations. LH said that Portsmouth had three ASB advisors, a private sector coordinator and a domestic abuse advisor. He said that they would be providing additional training in dealing with domestic abuse cases. He said that they are not carrying out regular case reviews to continuously learn and feed back to the teams. LH said that they were trying to develop a more consistent approach across

the service. He said that they carried out training including showing how resident engagement, scrutiny panels and customer satisfaction impacts.

JOQ asked about the private sector coordinator. LH replied that they looked at ASB in public areas but only in private accommodation if it was having an impact on the wider community.

JOQ asked about Portsmouth's satisfaction levels compared to the level of cases. Similarly to Nick, LH said that the figures can be misleading. He said that they generally managed between 480 to 540 cases actively at any one time. He said that officers had between 10 to 15 cases and the specialist ASB advisors managed between 20 to 25 cases.

JC asked about scrutiny panels and if they were linked to scrutiny committees. LH said that they have scrutiny panels, focus groups, and resident engagement that link in with how they manage anti social behaviour. They are currently reviewing the policies because they are rewriting the hate crime policy, hate crime, hate, instant domestic abuse and ASB policy, so the scrutiny panels look at that to identify from that side in line with the customers as well.

BF asked about big council owned blocks having a live in caretaker as they often used to. NB answered that in Derby they had 1 high rise block with a concierge who was a presence on site for much of the day and into the early evening. He wasn't sure if such a scheme would work in somewhere, like a London borough, that might have many high rise blocks.

EM asked about the domestic violence focus and how that had changed. LH said that they looked at all types of domestic abuse not just between partners. He said that the recently appointed domestic abuse advisor has so far worked really well and is currently rewriting the policy. He said that she was also upskilling the housing officers. He said that Portsmouth had 47 ongoing domestic abuse cases and that the advisor was now reviewing these to provide feedback to the housing officers. EM said that Brighton & Hove's housing team did have a complex case team in place.

SS (Cllr Sue Shanks who had entered the room during the last exchange) raised the issue of councils who do have live in caretakers. NB responded that rather than staff in blocks they were empowering residents to deal with issues by giving them the power to hold meetings and put the focus on the right areas. JOQ said that it was always difficult to reach some people and that in some cases these types of meetings could end up dominated by a small minority.

JOQ thanks witnesses for their time in coming to speak to the group and closed the meeting.

Antisocial behaviour in Social Housing Task & Finish Group Evidence Session Three
18th November 2025

Present: Cllrs Julie Cattell, Milla Gauge, Ellen Mcleay, Bridget Fishleigh. Angela Stretton (OPC). Richard Jordan-Penswick (BHCC Housing Manager), Graham Davies (BHCC Housing Manager)
Apologies: Cllr Jackie O'Quinn

Witnesses: Guinness Partnership - Vicky Weir, Safe Neighbourhoods Manager- South Region. BHT Sussex - David Chaffey, Chief Executive and Paul Fagen, Head of Housing. Hyde - Craig Kendall, ASB Service Manager.

Guinness Partnership – Vicky Weir, Safe Neighbourhoods Manager- South Region

VW began by speaking about Guinness' antisocial behaviour policy, which is a national policy covering all of their 150,000 residents. All the desk work for ASB is done by a support team in Oldham, such as phone calls, letter writing, legal paperwork. VW said that there was a Safer Neighbourhood team dealing with ASB in the North of the country and the South (which VW manages). The team in the south has nine safe neighbourhood officers, with one covering the Brighton area. Across the country they manage around 1000 cases a month. The officers will do everything and follow a case through from the initial call to legal action.

BF asked a question about improving communications and contacting neighbours about ASB.

VW said that if a report is of a kind that is likely to affect more than one person, such as noise, drugs, nuisance gatherings, that they would automatically send out either by post or door knocking, a survey to neighbours that they can fill in at leisure. VW said that some people were reluctant to report ASB but this would give them the opportunity to share their concerns. VW said that they send out surveys twice a year and that on larger schemes they hold twice yearly community events with the police to give customers the chance to speak with them. VW said that they ensure that Guinness gives a range of methods for residents to contact them and were producing a new online system so customers can raise cases to themselves directly from an app on their phone.

MG said that she was impressed with the domestic abuse booklet produced by Guinness and asked a question about the interplay between domestic abuse and antisocial behaviour.

VW said Guinness had a separate domestic abuse and safeguarding team, which has enhanced DAHA accreditation. However, VW recognised that domestic abuse and antisocial behaviour often go hand in hand as for example, what is reported as noise nuisance could be domestic abuse. VW said that all staff were trained to know the signs of domestic abuse, including call centre staff and repair operatives who may be seeing repeat repairs for things like door handles or holes in walls. VW said that staff were always very careful when talking with residents to never put them at risk if there were signs of domestic abuse. VW said that if there were concerns or

questions that staff are trained to refer it to the domestic abuse and safeguarding team.

MG asked about the statistics of prevalence of referrals from the Antisocial behaviour teams to the domestic abuse and safeguarding team.

VW said that she did not have figures to hand but asked if the team could email with the ask and she would ask the domestic abuse and safeguarding team for information.¹

JC asked if training was done internally or externally and if it was trauma informed.

VW said that the domestic abuse and safeguarding manager carries out the training and is very experienced and an ex-social worker. VW said that they did occasionally send staff out for external training when the opportunity arose, but most was done internally. VW said that the training was trauma informed and that staff were also trained on mental health awareness and suicide awareness.

BF asked a question on the number of closure orders.

VW said that they had done 8 across the country, with most of them being in the North. This was because they found it more challenging to get the police and local authorities on board in the South. Despite always trying the response was often that the police or local authorities did not have the time to do put together the closure order and complete the legal paperwork. VW said that they were looking forward to

¹ Following the meeting information was provided by Guinness Partnership's Safeguarding and Domestic Abuse Manager:

- The ASB transferred 5 cases for Domestic abuse support and 15 cases for safeguarding support during this time from 1st April to present date as it was deemed a DA or SG concern - please note this is not including cases we work alongside the ASB team as there are often a cross over of cases and we can also work in unison as there are safeguarding/ domestic abuse concerns as well as ASB complaints.
- The Domestic abuse and safeguarding team have transferred 42 cases to the ASB team as the resident's complaint were more appropriate to be dealt with by the ASB team.
- Our Guinness property operatives receive eLearning training on safeguarding and domestic abuse, they also receive toolbox talks on topics around safeguarding and domestic abuse. The domestic abuse training includes what domestic abuse is, types of domestic abuse, why people may remain in relationships, barriers of leaving, spotting the signs of domestic abuse in a housing context, scenarios colleagues may come across, what to do in an emergency, what the domestic abuse team do and how to refer to the team.
- We have also developed a domestic abuse booklet to support with people's understanding of domestic abuse. During our 16 days of activism communication campaign/ safeguarding adult's week we also publish awareness raising communications in Guinness properties newsletter which is distributed to operatives as well as on the internal intranet for all colleagues to access.

new powers being given to housing associations to use closure orders themselves without the need to request them from the police or local authorities.²

RJP said that in Brighton & Hove they held regular closure planning meetings where housing associations would bring their cases to the council and that these were often approved. RJP said that the housing association would be tasked to carry out the legal activities, prepare the witness statement, prepare the case for court, and it will then be put into court by the council's community safety team.

JC asked how many had been done over the last five years.

RJP said that it was in the region of 20-25 in the last five years and that it is the only intervention that they can get into court in good time. RJP said that they can be used for all types of property.

BF asked if VW thought that a dedicated housing court would help resolve antisocial behaviour cases.

VW agreed and said that it takes a huge amount of work to get cases to court but then if the court date is not for another 12 months, then the residents would continue to suffer. VW said "We need a dedicated court that will significantly shorten those time frames. It would be great if that time frame was closer to one to two months as opposed to nine to 11 months." VW said that if there was a dedicated housing court then they would know that they would be going before specialist housing judges, not judges who rarely dealt with housing cases. VW gave an example of judges not knowing that housing associations can represent themselves in court and sending them away to hire a barrister, causing more delays.

EM asked what happened during the wait for court dates particularly what on going support was offered to residents.

VW said that it was standard practice to contact complainants every two weeks as a minimum in their preferred method of contact. VW said that they may also make a referral to victim support, and encouraging victims to engage with other agencies such as reporting to the police. VW said that they also offer support to the perpetrator to get the help that they need, including maximising benefits, offering drug and alcohol support services, or help getting food. VW said that although support was not always accepted offers were always made. VW said that if they had concerns about a perpetrator's wellbeing, they would contact their GP to raise them.

² Schedule 2 of the [Crime and Policing Bill](#) (currently in the House of Lords) amends Chapter 3 of Part 4 of the Anti-social Behaviour, Crime and Policing Act 2014 so as to enable registered social housing providers to close premises that they own or manage which are associated with nuisance and disorder.

This could be done under best interests without the person's consent if necessary. VW said that they would rarely hear back from the GP.

AS asked about support for the complainant.

VW said that support was offered to the complainant, and they would be asked if they were managing to keep up with their rent and food payments and could be referred to customer support. VW said that they could refer them to more specialist services like Age UK for elderly residents. VW said that they could not do everything for residents but would be able to give them support and guidance.

BF asked if there were any powers that they would want from councils to help them do their job better.

VW said that Guinness had an agreement with Cheshire East council to work closely together on noise cases, so that Guinness would do the groundwork and when they have exhausted all that they can do it will be passed on to environmental health at Cheshire East, but rather than asking the resident to start again recording diary sheets they will accept the evidence already gathered by Guinness, rather than making the resident start the process again. VW said that housing associations do not have the powers under the Environmental Protection Act 1990 that the local authority does to deal with noise so they can't issue noise abatement notices or community protection warnings and so having that kind of seamless approach with the council's environmental health team would be very useful.

BHT Sussex - David Chaffey, Chief Executive and Paul Fagen, Head of Housing

PF said that BHT Sussex's entire housing stock was 400 with 250 in Brighton, and that his team was made up of seven staff.

There was a discussion around specific issues at South Downs Court in Rottingdean.

PF said that they were not a pure housing association in the traditional sense because they are made up of more than 20 different homeless projects. PF explained that they get 50% of their residents from general needs via home move and blocks such as South Downs Court and Richard's Yard on New England Road that are taken on with an agreement from the private rented sector and let on short term basis to tenants from their projects.

BF asked about contacting neighbours. PF said that they could always do more and that they contacted complainants at least every two weeks to check in, but that some people needed more contact and others less. PF said that as a smaller organisation

they could learn a lot from larger organisations and that they too did community engagement events involving the police in different areas.

BF asked if PF agreed with VW about working closer together on noise complaints. PF said that residents not having to do witness statements twice would be very helpful.

MG asked about their approach to domestic abuse. PF said that they did not have a separate team but that the team did have external domestic abuse training. PF said that smaller organisations who lack specialists like larger organisations could be left more vulnerable.

AS asked what the main challenge was in resolving cases. PF said that court delays were a massive challenge as it can take nine to 11 months to get a case to the point of applying to the court and the delays can add the same time on again. This creates challenges for the complaint having to live with the issue for so long.

JC asked about dealing with issues via mediation. PF said that they had recently commissioned Brighton & Hove Independent Mediation Service in a 12-month partnership to take on up to 20 cases. PF said that this sort of early intervention was key.

JC asked RJP if this was something that the council did. RJP said that it was integral to the council's casework and that in dealing with the early stages of antisocial behaviour cases involving mediation can really have a transformative effect. JC asked if there were statistics available from the council to show how many cases were dealt with by mediation. RJP said that those statistics could be drawn out from the database.

DC said that BHT had previously worked in an organisation that had moved away from patch-based housing officers to a system where who every was available took the case. DC said that they had decided to have dedicated housing officers who work specific patches, meaning that they can get to know people in their area. DC said that a Tenancy Sustainability Officer had been brought in to work more intensely with people. DC said that their staff to tenant ratio was low because of the way the organisation was set up, but also because they need to operate that way because half of the tenancies come from their own projects where they may have experience of homelessness, drugs, alcohol, or mental health problems. DC said that they worked very differently to larger housing associations and worked closely with many more of their tenants. DC said that they have brought in starter tenancies, which means potentially a tenancy could be ended under certain grounds without having to go through the full court process. DC said that they have done this for eight years and have never had to evict anyone. DC said that they do a good job in setting out expectations, rights, and responsibilities, as well as supporting them intensively

through the first year to ensure that they are getting their benefit entitlement, paying their rent, and being a good neighbour.

DF asked about the use of closure orders and court delays.

PF said that they don't make use of closure orders but would be looking at the new powers planned to be given to housing associations with interest. PF said that their first use of CPN since BHCC devolved the power ultimately ended up with the perpetrator being evicted but that this had taken more than six months.

AS asked what happened after eviction.

PF said that the tenant would report to the local authority who would assess their homeless need. PF said that they would let the local authority know to expect the contact.

RJP said that everyone had the right to approach the local authority under the homeless legislation, and the local authority would have to look at whether they were homeless, whether they were vulnerable, and the circumstances whether they were homeless intentionally or unintentionally. RJP said that this is where the information from BHT would help, as if they were evicted for perpetrating ASB they could be intentionally homeless and the local authority would have no long-term duty to house them, and they would be given advice and assistance to find their own accommodation.

Hyde - Craig Kendall, ASB Service Manager

CK said that they were responsible for around 120,000 properties across the South including Hampshire, Sussex, Surrey, London. CK said that they managed 16 ASB officers, and a four-person administrative team who take receipt of the inquiries that come in and allocate them to ASB officers. CK said that in Brighton and Hove there were two ASB officers if needed for casework. CK said that the service had recently undergone significant changes as there were previously at least five ways to report ASB and these streams were managed by different people creating duplication and delay. Now there are only two ways to report ASB, by phone or on an app where the customer can create their own ASB case which goes directly on to the case management portal. On this portal residents can directly contact the ASB officer and upload evidence. It also creates reports and a timeline of events. CK said that they will always look at early intervention including warning letters and an external mediation service run by Crime Concern. CK said that Hyde use a professional witness service where their staff will go to a property and gather evidence in an objective manner. CK said that they also use the Noise App to allow residents to provide real time recordable audio evidence of noise nuisance. CK said that Hyde

were really keen on, and they have found quite effective, was to serve a notice for breach of tenancy if they believed there was a body of evidence that there was a significant breach of tenancy. But that this was not done with the objective to evict but as a warning that the behaviour is a breach of tenancy and could result in eviction. CK said that it was a sobering reminder to people that their behaviours can put tenancies at risk.

MG asked about recognising domestic abuse and dealing with it sensitively. CK said that domestic abuse was managed by Hyde's tenancy team as it happens within the home not so much to others outside of the home. CK said that they work closely with the tenancy team and that there were proposals to merge the two teams. CK said that Hyde was looking at DAHA accreditation. CK said that all frontline officers have training on domestic abuse and regular safeguarding training updated every three years. CK said that repairs operatives were also trained to recognise the signs of domestic abuse within the property.

BF asked how placements worked so that vulnerable residents ended up placed in properties that were not suitable for them, with neighbours who would not accept their behaviour. CK said that allocations were not his area of expertise, but that gender would not be a factor in where to place someone, but if the property was suitable. CK said that if taking possession of property, they would look at the reason for previous eviction and be sensitive when placing a new tenant there.

BF asked about the portal and if there was a private side that the resident could not see. CK confirmed that there was and that the victim would not be able to see details of the perpetrator.

BF asked about communication with victims as some feel that they do not get enough. CK said that the new system had really helped them to manage KPIs effectively. CK said that category A, which is target violence, arson, sexual offences, gun or knife crime, would get a response in 1 working day. Category B, non-targeted such as noise nuisance, drug use, group disorder, would get a response within 5 working days. CK said that there were monthly case reviews and contact with the customer as appropriate with more serious cases receiving more contact. This contact was always by the resident's preferred method.

JC asked if they kept in contact with the perpetrator. CK said that they did.

JC asked about examples of cuckooing. CK said that they did and that cuckooing was really interesting as it often presents as ASB being carried out by the resident who is a victim of cuckooing and it's only when investigations are carried out that this is found out.

BF asked how many cases were taken to court in Brighton. CK said that while he didn't have figures to hand it certainly was done and was maybe around half a dozen.

BF asked if a specialist housing court would help. CK said that if one of those could be in every area it would help as the court system was buckling at the knees and the delays have such a detrimental impact on the victims on ASB. CK said that court delays meant that ASB officers were holding on to cases that could have been resolved if they had gone to court and that the 16 ASB officers had 809 cases across all of their housing stock.

Antisocial behaviour in Social Housing Task & Finish Group Evidence Session Four
21st November 2025

Present: Cllrs Jackie O'Quinn, Ellen Mcleay, Bridget Fishleigh. Angela Stretton (OPC). Graham Davies (BHCC Housing Manager)
Apologies: Cllrs Julie Cattell, Milla Gauge

Witnesses: Moat - Kerrie Jenkins, Tenancy Specialist Manager. Southdown - Jim Aspdin, Director of Housing & Assets.

Moat - Kerrie Jenkins, Tenancy Specialist Manager

KJ said that Moat covered Essex, Kent, London, Sussex and had larger city centre developments that were mainly flats. KJ said that they had a specialist team of traditional ASB officers made up of six tenancy specialist officers and a domestic abuse specialist. KJ said that they operated a patch-based system where possible but the team are dynamic and do go where the work is. This patch-based approach allows the team to get to know the areas, stakeholders & local partners, and to be visible to customers.

BF asked if all the tenants in Brighton & Hove came through the Homemove system. KJ said that she would need to check with colleagues but imagined that most would come via the local authority.

EM asked about work with local authorities and other local partners. KJ said that they work closely with local police forces and attend regular HASBRAC [Hate & Anti-Social Behaviour Risk Assessment Conference] multi-agency meetings. KJ said that they work very closely with officers from the community safety units and regularly go on walkabouts with police community support officers.

EM asked about preventative measures. KJ said that they have launched a new ASB policy and procedures as well as a new separate hate crime and hate incidents policy. KJ said that Moat use the ASB app and have an out of hours services for all customers so that they can get hold of someone when the office is closed for immediate assistance. KJ said that Moat participates in national ASB awareness campaigns and ASB Awareness Week. KJ spoke about ASB Awareness Week 2024 where they went to a large development near Brighton Railway Station with local policing teams to meet with residents. This was done on a Sunday to ensure higher levels of engagements to catch people who would not be available in the week.

AS asked about service level agreements around contacting complainants. KJ said that within the new policies and procedures they had refined the offer for customers. This included that any case where there is a threat of harm to the customer, a serious threat of harm, or an immediate threat of harm, such as physical violence, any threatening or intimidating behaviour, harassment, hate crime and hate incidents included in that they will contact and speak with customers within one working day. That will include completing risk assessments, completing action plans and carrying out any immediate safety works for the home, such as lock changes. KJ said that any kind of nuisance, environmental type of antisocial behaviour, Moat will contact customers and complete those works within 5 working days.

JOQ asked for more information about the ASB app. KJ said that the ASB app was through an external provider and is nationally used by a range of housing providers. The app is free and can be used by non-Moat customers reporting ASB in Moat

properties. KJ explained that using the app customers can fill in diary sheets, or use a microphone to verbally record diary sheets, customers can also use it to upload audio, photo or video files as evidence of their reports. KJ said that the app also asked customers to provide the impact that the behaviour is having on them. When incidents are submitted on the app case officers will automatically get a notification enabling them to carry out any required action. KJ said that customers are still able to fill in paper diary sheets and speak to staff if they are unable to use the app, but that most residents are able to use the app.

JOQ asked a question about using the app to create timelines of incidents and contact to enable residents to understand what is going on. KJ said that although the app could be used as a case management system, Moat did not use it for this purpose as they have their own case management system, to ensure that other departments can still access the data. KJ said that their case management system had mandatory fields for preferred method of contact and frequency of contact, which would be set out in the action plan with the customer.

JOQ asked about the reasons for residents not being satisfied. KJ said that satisfaction was broken down into two key areas: satisfaction with the way the case was handled by the officer or organisation and satisfaction with the outcome, and that these can be two very distinct things. KJ said that Moat are focused on case handling, ensuring that they are following their own policies and procedures, adopting best practice, and putting customers at the heart. KJ said that they try to manage expectations on what they can and can't deliver, which some customers don't understand because they don't work in the sector. Particularly around eviction which will only be used as a last resort if everything else hasn't worked. KJ said that dissatisfaction tends to come from things such as not being kept informed, and that residents see that the ones causing the issues are getting a lot of support, but because of GDPR we can't share exactly what might be going on with their neighbour.

BF asked a question on the use of community protection warnings/notices in Brighton & Hove. KJ said that they had not used these powers as it was difficult due to the size of Moat and the number of authorities it works in. KJ said that they still worked with local authorities and the police.

BF asked about the use of closure orders in Brighton & Hove. KJ said that they have not done so in Brighton & Hove but have in other parts of Sussex.

BF asked if KJ would support a dedicated housing court. KJ said that they would and that they feel the frustration, which must be worse for the customer.

AS asked a question about satisfaction scores. KJ said that they joined about two and a half years ago and had worked to develop a specialist offer and had recruited and expanded a specialist team. KJ had implemented in house training for all departments including training up neighbourhood response officers. KJ said that they also had a customer scrutiny panel, and that their next project would be looking at antisocial behaviour. KJ said that these were really useful to look at areas or gaps in services. They were also using feedback from housing ombudsman determinations to change their approach.

JOQ asked a question about recruitment and retention, following on from previously speaking with Westminster City Council who should have had a large team to deal with ASB but were struggling with recruitment issues. KJ said that having done the job that it is important to emphasise with the team and internally support colleagues. KJ said that they had weekly team days in the office enabling them to collaborate and to offload when needed. KJ said that having recently tried to recruit for maternity cover in Sussex it was so difficult that they ended up using agency staff. KJ said that having spoken to others working in the industry they were finding the same issues in recruiting staff. KJ said that a way around this, that they were doing, was to upskill internal colleagues from areas such as customer services who had an interest in becoming case officers.

BF asked if there was anything that might improve how they work with councils. KJ said generally speaking that housing associations tended to get a second-rate service as opposed to working in an ASB team within a local authority. This was because it was easier for ASB or community safety teams within local authorities to know who to speak to about issues and have easier access to them.

BF asked about the situation that can see residents asked to fill in noise diaries for their housing associations and then made to start the process over again when the matter is referred to the local authority. KJ said that they were drafting a new policy and procedure for dealing with noise complaints and management of customer expectations as that by issuing paper diary sheets it is setting up an expectation of enforcement. KJ said that the ASB app allows the sharing of digital diary sheets and audio recordings of noise with the local authority if necessary.

Southdown - Jim Aspdin, Director of Housing & Assets

JA said that they were a small specialist supported housing provider and a relatively large regional care and support provider working with 12,000 clients a year with 480 homes, which are predominately supported living provided for the council. JA said that they offered very different types of tenancies to general needs including 120 or so properties with no staff on site, people getting 130 hours of support a week, people who are formerly homeless, dispersed refuge accommodation in a

partnership with Rise where people may be getting only one or two hours of support a week. JA said that they had a small caseload and didn't have a dedicated antisocial behaviour team because of the nature of the housing and the intensive support that is provided. JA said that often the antisocial behaviour that they have is complicated by mental health issues, drug and alcohol issues, vulnerabilities, acquired brain injuries, learning disabilities, and undiagnosed issues. JA said that they provided a supportive approach to ASB with a lot of communication needed.

BF asked a question about satisfaction scores. JA said that they were a small organisation and that their aim is to be local, visible and very responsive.

BF asked about higher numbers of ASB cases per 1000 compared to other housing associations and if this was the nature of the type of people they are supporting. JA said that if their clients weren't exhibiting some sort of challenge in managing or sustaining their tenancy then they might have offered the tenancy to the wrong person. JA said that people were offered a tenancy with Southdown because they needed something more supportive than general needs housing and that they had people who are moving on from place like homeless hostels or psychiatric inpatient units, and that they would expect a higher level of antisocial behaviour.

JOQ asked about ASB satisfaction scores going up and number of hate incidents going up. JA urged caution when looked at the figures because of the small sample size, as they had no hate incidents last year and one this year. So although statistically very different in the way the data is presented, in terms of numbers it is not very different. JA said that they were consistently improving management of antisocial behaviour and had refined that and through communication reworked their approach to antisocial behaviour. JA said that they were stressing to residents that they were accessible, and used WhatsApp to allow people to report antisocial behaviour.

JOQ asked about the demographics of residents. JA said that it tended to be working age adults, 70% male 30% female.

JOQ asked about the kinds of mental health issues that residents had. JA said that they have people with severe and enduring mental health issues, such as schizophrenia, bipolar disorder, disorders of personality, severe and enduring recurring cyclical illnesses. They also had people with anxiety, acquired brain injuries through substance misuse or problematic drinking, depression.

AS asked about how complainants are supported. JA said that they were working on explaining what antisocial behaviour is, explaining the boundaries of what they can do, about evidential standards, and what is a natural part of living in close proximity to other people such as babies crying or footsteps. JA said that because of the

vulnerable nature of their clients they can on occasions be the victims of antisocial behaviour and not be aware as the behaviour becomes normalised.

BF asked about feedback on improving the council's interactions and processes with Southdown. JA said that he may not be close enough to the coalface to know exactly. JA said that they worked closely with community safety teams and the police. JA said that the level of responsiveness and an awareness of what housing associations need would be something.

JOQ asked about how many cases go to court. JA said that they do take cases to court but that these were often complicated by mental health issues and that because they were offering supported tenancies that they were sometimes using section 21 notices. JA said that often they were working to get people into more suitable accommodation and possible back into hospital accommodation.

JOQ asked about the feelings that victims have that the perpetrators get better treatment because of the length of time things take to be resolved. JA said that there was frustration particularly with the amount of time things can take due to delays and inefficiencies in courts. JA said that a lot of work was put into expectation management. JA said that he did not necessarily feel that as a rule victims felt that the perpetrator was treated better but said that they were often acting more quickly or in a different way. JOQ said that may be because they would probably be less likely to move a victim of antisocial behaviour due to the nature of the support needed. JA said that was right, but it is not unknown for them to move victims of antisocial behaviour and had recently moved a victim. JA said that it was a balancing act between providing people with the support needed and ensuring that residents have a quiet, comfortable and undisturbed home where they can recover from their issues.

AS asked about service level agreements around communicating with complainants. JA said that they would get back to emergency issues within 24 hours and other issues within seven days. JA said that they would communicate with complainants on an ongoing basis throughout the complaint and that this would be determined on a case-by-case basis.

The meeting ended at 14:35.

ASB in Social Housing Task & Finish Group Evidence Gathering Session Five
17th December 2025

Present: Cllrs Jackie O'Quinn, Milla Gauge, Ellen Mcleay, Bridget Fishleigh. Angela Stretton.

Apologies: Cllr Julie Cattell

Witnesses: Sussex Police - Inspector Emma Gee (Neighbourhood Policing Team) & Steve Parker (ASB and Hate Crime Coordinator). Office of Peter Kyle MP - Domino Moore & Matilda Crawley.

EG began by explaining the data held by the police for antisocial behaviour and that reports of ASB would come in and be labelled as either environmental, personal, or nuisance. There is not a tag for social housing, so it was not possible to give figures such as victims or accused being social housing tenants. The work included attending fortnightly HASBRAC meetings and PCSO ward updates. EG said that the neighbourhood police guarantee meant that they needed to be available for residents and residents can look up the ward updates to know what is going on. EG explained that they have two ASB and Hate Crime Co-ordinators and that their role is key in identifying ASB. EG talked about the risk assessments that were carried out

when antisocial behaviour was reported, taking in the overall context and history of the issue as well as how it is impacting on the victim. Each report is scored as standard, medium, or high risk. If medium or high then it could be referred to the HASBRAC meetings to work collaboratively with partners on the issue.

EG said that a lot of their work involved problem solving and reviewing reports and data early to be able to get in and resolve issues before they escalate. EG said that they worked with victim support and community engagement advisors to support victims. EG spoke about the new engagement app that Sussex Police are using which means that residents can see the patrol hours of their local PCSOs and what they are doing. EG said that they are able to pull data from this to tell people how many patrol hours were conducted in their ward over a period of time.

EG said that they had a good relationship with partners, particularly Brighton & Hove City Council. EG said that as statutory bodies the police and council have more powers in relation to closure orders and civil powers than other landlords and would need to take the lead on these. EG said that they met regularly for case reviews, HASBRACs, closure order consultations, and planning meetings. EG said that PCSOs do regularly meet with housing officers in their areas, in East Brighton they have monthly meetings. EG spoke about the Hub Intelligence meetings, attended by police and partners, where they discuss repeat victims of ASB, as well as locations and suspects. This work is around reducing harm to communities.

EG said that they could improve on early intervention and communication & information sharing. EG said that a lot of Steve's role involved DPA requests asking for information relating to cases that partners are working on. EG said that this allowed them to get involved or see if they were addresses that they were also aware of. This allowed them to provide a joined up approach such as a joint letter or joint visit. EG said that it was important that everyone knew their powers and used them as quickly as possible.

EG suggested a monthly partnership meeting, with tight terms of reference, where the police, housing officers from the council and other social landlords could come together and talk about their top cases and emerging issues to work collaboratively to solve issues. EG also said that having an up to date contact list of those at a strategic level where she could raise problems, for example where a PCSO is trying to make contact but not getting an answer.

BF asked how this might differ from HASBRAC meetings. EG said that HASBRAC was for medium and high risk cases, but this could be more for emerging issues so that they can look to resolve the issues before they become serious.

MG asked a question about partners data systems working better together and on the overlap between antisocial behaviour and domestic abuse. EG spoke of the data tags used by the police and explained that they did not record the housing. MG asked GR and LP if the council used the same ASB tags. GR said that they would find out. EG said that there was the 'Winter of Action' currently going on involving the police and partners that focused on VAWG, as well as ASB, street crime, retail crime. EG said that they had a public protections team that focused on domestics. EG said that when dealing with antisocial behaviour that if there was a domestic side to it that it was highlighted with the bluestone team and they would make sure that the victim was safeguarded. They also made sure that if response teams are attending addresses or people that they are aware of markers for antisocial behaviour or domestics. MG asked if that information would be shared with the council and others. EG said that it would depend on who was involved and who needed to know.

EM asked if police resources were being drained by antisocial behaviour call outs and how the council could help the police. EG said that it was not a drain as it was what they were there to do, but that a lot of people in social housing where there because they had vulnerabilities, possibly such as drug and alcohol dependencies, unemployment, or mental health issues, which do increase demand. However this is a social issue and not something that the police could change.

EM asked if the PCSOs had to do a lot of the groundwork to create and improve relationships with housing officers and if it would be helpful for a more proactive approach from the council. EG said that having a list of both council contacts and for other social housing providers would be helpful as contacting some housing associations they only had the customer service email address and weren't getting responses.

BF asked about an incident involving a police call out in Rottingdean to a council owned property and if the council would be informed of the police attendance at the property. EG said that the response team wouldn't be thinking about that but focusing on reducing harm. But that if it was a significant incident and the person arrested then the PCSOs would make contact with the housing provider. EG said that the person may also have bail conditions to not return to the property or to prevent them from causing further harm.

AS asked about the number of repeat cases. EG said that Denman Place had eight repeat incidents, which was a neighbour dispute involving cannabis smell in some of the flats. Kingston Close in Hangleton had eight reports, which was a neighbour dispute between two council tenants. Both had been issued with community protection warnings to leave the other alone and there had been no reports since 25th Oct. Hampshire Court had seven incidents, which were several neighbour disputes mostly over the communal garden and rough sleepers in the car park.

Montpelier Road had six incidents, which was a Southern Housing tenant with mental health issues who was shouting from the property distressing neighbours. EG said that the police were working with Southern and the mental health team to provide support to them.

Witness two: Office of Peter Kyle MP - Domino Moore & Matilda Crawley

DM said that they had noticed a significant increase in the number and complexity of ASB cases in the Hove & Portslade constituency. DM said that people tended to contact the MP at a late stage when they have exhausted every other option. They are often frustrated with every other organisation they have been trying to get an answer from. DM said that they had difficulties in finding out where people were in the systems of different organisations. Sometimes this was due to a lack of response following the MPs office making contact with an organisation. MC highlighted the struggles they encounter trying to get responses from the council's housing team.

BF asked if they were raising the cases with Genette Laws (Corporate Director for Housing and Adult social Care) or Jess Gibbons (Chief Executive). DM said that they used a mailbox with a staff member on the other end who triages the emails and distributes them, but he did not have the answers and even when chasing cases he could only pass it on again. DM said that if they did not get a response for months they may talk to the local ward councillors to try and get an answer.

BF suggested that the MPs' Offices be introduced to the complex case team enabling them when appropriate to bypass the normal mailbox.

JOQ said that this is something that could possibly be done before the report is published.

BF asked about the process of what happens when they get a complaint. DM said that a constituent would contact them directly, having already gone through a process with another organisation such as the council and not got anywhere. The MPs office would then contact the organisation and possibly the councillors. JOQ gave an example of a case that she had referred to Peter Kyle's office.

JOQ spoke about instances where a lack of building repairs had lead to anti-social behaviour such as the Sanctuary Housing building in Davigdor Road in Hove, where repairs to the car park were not carried out which lead to people parking stolen cars in there. The electrical plant room was also broken into and people were sleeping in there. JOQ said that residents had contacted local councillors but that they were not getting responses from the housing association, and it made a big difference to have the MP contact the housing association which helped to get the repairs done.

EM said that an MP's office contacting the council was another opportunity for contact with the resident. EM asked about their contacts to raise an issue after not getting a response and if they were referring residents to the Housing Ombudsman. DM said that they did not refer people to the Housing Ombudsman as to go there a resident would need to have complained to the council and gone through the full complaints process. DM said that the person monitoring the mailbox that they used was very good but that they did not have other contacts to use if cases needed chasing, they would in such instances go to ward councillors.

AS said that, having previously gone to Peter Kyle for help with a housing association issue, she knew that people only did so when at the end of their tether.

BF asked if they knew about being able to make a DPA request to the police. DM said that they never have.

BF asked EG if this would be the best way for the MP's Offices to request information. If, for example, someone contacted them about a problem neighbour and they want to see what the police are doing, is this the most efficient way. EG added the ASB and hate crime email address to the meeting chat asb&hatebrighton@sussex.police.uk and said that they can fill out the DPA request form and send it to the email address and it would be actioned. EG clarified that there would need to be a policing purpose to the request as they are sharing personal information. EG said that they could email the inbox for more general inquiries if there was something that they wanted the police to look into.

AS asked how many cases they had live at any point in time. DM said that there were some that come in and can be dealt with quickly but also more complex long term cases of which they had about 12.

BF suggested that a possible recommendation could be that the MP's Offices are included in some of the councillor briefings on appropriate topics. DM said that was a good idea and suggested that if the police or councillors are struggling to find direct contact details for organisations such as housing associations then they could possibly help as MPs often have access to contact details other than publicly available general inquiries inboxes.

JOQ spoke about the importance of communication being an issue that has come up through the Task & Finish Group and that even if there was no particular update for a resident that being told so after a period of time at least made them feel that people were doing something and that they hadn't been forgotten about. DM agreed that if the council came back to them and said 'nothing has changed, we are waiting for this or that' then that would be much better for everyone than having to tell a resident that they still hadn't received a response from the council.

The meeting ended at 16:46.

ASB in Social Housing Task & Finish Group Evidence Gathering Session Six
20th February 2026

Present: Cllrs Cllr Julie Cattell, Ellen Mcleay, Bridget Fishleigh. Angela Stretton (OPC).

Apologies: Cllr Milla Gauge

Witnesses: Brighton & Hove City Council: Harry Williams - Director of Housing People Services, Justine Harris - Head of Tenancy Services, John Evans - Housing Manager

BF asked if they would support a housing court to reduce delays. JH said that they would welcome the recommendation.

JE explained the areas that the city is broken up into: North, West, East, and Central.

BF asked the problems moving problem residents because it often just moves the problem somewhere else rather than solving it. This was the view that came out of the public engagement. BF also asked about problem tenants being moved into properties, particularly where there has been experiences of ASB in the past, and if consideration is given to the residents living nearby. HW said that they wanted neighbourhoods and communities where people felt safe, where they can thrive and that are inclusive. He said that the city had about 5800 people waiting for a council home and around 2200 people living in temporary accommodation. HW said that there was an increasing vulnerability in people seeking council homes and that there was a balancing act of consideration of their needs and the community. He said that the allocations policy did take into consideration past criminal or ASB but that it did

not exclude people from accessing social housing. HW explained that once a person was a tenant that there were different powers, but those often involved the courts, where there were delays. HW said that they were setting up a working group with the Chairs of the Area Panels and the head of homelessness to review the practice of reviewing people's offending history or antisocial behaviour to make sure that they have got the right checks and balances, and making the best use of sensitive lets. HW explained about sensitive lets, which is where checks and balances are in place to ensure that communities impacted by ASB are thought of when a property is allocated to a new tenant there.

JC asked about support for tenants in their first year. HW said that they did provide support and were looking to provide it earlier on to people before they become council tenants, thinking about them as pre-tenants. JH spoke about community cohesion and making sure that new people feel part of their new community.

JC asked about the new temporary policy of placing people into voids rather than TA. HW spoke about people coming out of really unsettled accommodation and into more stable temporary homes and integrating them into the community.

EM asked about the use of additional support of other organisations, charities or voluntary groups. JE said that when a sensitive let application is made the housing officer or housing manager would know the area and the block and know if the property was suitable for that person and would refuse it if not. For example, if an area was known for drug use, then someone with a history of drug use would not be placed there. JE said that it was not always foolproof and that they don't always know what will happen once someone completes, but that most of the time they work. JE said that they had to have conversations with tenants to find out what support they have, if any, and what they need. However, not everyone wanted to engage or tell them about such things. JE spoke about introductory tenancies, comparing them to a probationary period. He said that in theory this period should make it easier to take action against tenants causing ASB as it should be an internal decision unless there has been a mistake or a human rights issue. He said that the first action would be to extend their introductory period by another six months. During the first year they are meant to have three formal visits and then two further visits as a minimum but most tenants are fine and don't need any additional support.

AS asked about the focus on complainants and their mental or physical health needs or substance abuse. JE said that there were reasons why they supported perpetrators as it helped in the long run, but the first thing that a caseworker would carry out in a case is a risk assessment and that they would get bespoke support based on that risk assessment. JE said that this might include practical things like a fireproof letter box or it could be linking them with a social worker or additional

opportunities to talk. In this assessment they would agree the mode and frequency of contact.

JC asked about domestic violence markers. JE said that they worked closely with the police to see if markers were there.

EM spoke about instances where victims have become frustrated with the situation and felt that they weren't being communicated with and moved from victims to perpetrators themselves. HW said that there were often complicated situations where dynamics can change quite rapidly with victims could become perpetrators and perpetrators become victims but that there shouldn't be any justification for a victim carrying out antisocial behaviour. JH said that Richard Jordan-Penswick had begun work on strengthening witness standards. JE said that errors do happen and communication with residents can lead to complaints but that generally there was a good relationship with those reporting ASB. JE spoke about the importance of expectation management and properly explaining the processes and timescales because it was easy to forget that it's not second knowledge to everybody. JE spoke about the possibility of an FAQ sheet in opening letters to explain some of the issues that frequently come up in council inquiries or stage one complaints.

BF spoke about a recent incident in Rottingdean and her use of a DPA following the evidence session with Sussex Police to find out what had happened so that she could share it with the residents.

BF asked about the use of app such as the ASB App to report incidents and keep logs of cases. EM said that it collated all of the contacts in one place so that nothing was lost. AS mentioned digital exclusion and that not everyone could use apps. HW said that they would like to use technology. HW explained about the ECINS system that is used for case management and report writing by the housing team, saying that it had been around for a long time. JE explained that it was a national database used by lots of councils, that it had previously been used by Sussex Police, and that it had profiles on victims, perpetrators, and witnesses. HW said that it was a very good system.

AS asked about data sharing. HW spoke about the importance of data sharing to their work and that it is a challenge for all services. He said that some areas had held citizens juries to ask whether or not residents would be happy for certain information to be shared with other organisations in order to provide better services.

EM asked about what they found frustrating and what they felt they didn't have the resources or funds to do better. HW spoke about the investment in the complex case team, and the new tenants sustainment team, a lot of expertise dedicated to improving practices, and a lot of work on complying with the social housing regulator.

HW thought that it was important to think about embedding that practice and continuing to improve the way that they work including with exercise like the TFG. HW said that he thought something about how best they could communicate with their communities and making sure that those messages were right to provide reassurance. EM said that so much was to do with communication and where residents feel some level of satisfaction in an issue it was because they had that communication and understood what was happening with their case. HW said that comms differed on a case-by-case and resident by resident basis. Also about how communicating more broadly with communities and what information could be shared with them. JE said that caseworkers should be updating reporters on the outcome of a case. He said that complaints of his previous work as a housing officer were because of not updating the victim rather than the work itself, which made him learn quickly to be sure to update people. He said that he asks housing officers to send summary letters to residents updating them on what has happened so far in a case as well as following up phone calls with an email of what was discussed and agreed.

AS asked if they were able to catch those cases that where communication had dropped off. JE said that the frequency of contact should be agreed and that any case over 200 days old would be reviewed. This could be because that it hadn't been closed properly or that there is a big problem. He spoke of internal and external reviews. EM said that some residents weren't always happy with internal reviews as they saw it as the council marking its own homework.

BF asked at what stage would they serve notice to a perpetrator. JE said that it was very case dependent and that they might not serve a tenant notice as it may not be proportionate to do so. He spoke about other steps leading up to that point such as injunction or community protection warnings that can lead to a fine if the behaviour continues. But again court delays had to be taken into account. BF spoke of some housing associations who issue a breach of tenancy notice very early on to stop the behaviour.[1] JE said that he was apprehensive to work like that because as a social landlord we should be looking more at behavioural change and supporting people to keep their property.

AS asked about the agreement that Guinness Partnership had with East Cheshire Council whereby the council would accept noise diary sheets from the housing association rather than asking residents to start the process again. JE said that it was different being one organisation rather than separate ones but that he felt that there was room for improvement in the working with environmental health as they might not know that a noise complaint had been made about a council property and was being looking at by environmental health. JE said that once they started joint working it was good. He said that some of the frustration may come from a statute of limitation if the evidence gathered is old.

EM spoke about residents saying that reports had gone missing. JE said that it shouldn't be possible if reported to the housing customer services team because everything was recorded pretty much straight away. However, some reports are not made through the proper channels to reach housing officers such as to a councillor, the police, or to a cleaner in the block, and so they might think something has been reported. JC gave the example of residents not using the contact your councillor form but sending an email direct or even using social media to report issues. HW said that there are now so many ways for someone to report something to different organisations that it might be possible for them to slip through.

JH spoke about the role of neighbourhood officers saying that there were eight across the city with two in area. They carry out estate inspections twice a week, being in an area each time. The neighbourhood officers are a visual presence on estates and have uniform sweatshirts. They are able to gather evidence where there are reports of antisocial behaviour that is impacting the community, they can do leaflet drops. JE said that the neighbourhood officers came out of the social housing regulation act saying that the council needed more presence on estates and as housing officers are caseworkers they cannot always be out on the estates as often as they would like. He said that they were now able to pick things up that weren't being picked up and that residents were getting to know their neighbourhood officers and that trust was being built. JE said that they were carrying out pre-active work to deter ASB such as securing laundry rooms that drug users had been getting into, finding graffiti and fly tipping.

BF asked if they were meeting people one to one or leaving this to housing officers. JE said that they worked closely together with the neighbourhood officers able to do things like deliver or collect noise diary sheets or provide face to face contact if a resident requires this frequently and the housing officer isn't available. Going out to see residents often requires going out in pairs so this would take two housing officers away from their casework, whereas neighbourhood officers are already out in pairs on the estate. JE said that they had a really high level of candidates applying for the roles, with varied skills that all added something to the role, citing one who was previously a premises manager and handyman and another who was a support worker for the YMCA.

AS asked about domestic violence training. JE said that all staff were trained on recognising domestic violence.

BF asked about caretakers living in blocks who can be the eyes and ears of the community. JE said that those caretakers became community wardens and have now been brought back as neighbourhood officers. JE did not think that live in caretakers would necessarily work in the modern world and previously there had

been issues of them having residents knock on their door in the middle of the night reporting issues.

HW spoke about cluster meetings with each area having its own groups involving a range of stakeholders such as police, neighbourhood officers, and an open invitation to others. The idea is to be an early intervention on ASB issues. He said that police were generally the only external invitee but that there was no formula saying who could or could not attend. JE said that they had started again last year.

EM said that she was seeing the benefit of neighbourhood officers, even just through email. She said that they were getting to know the issues in blocks and the people living there and had been able to ascertain if an issue was the usual suspect or someone else. EM asked about mediation as being an effective way to find a solution to ASB reports rather than more formal channels. HW said that mediation had to be consensual and was a tool that they did use but that both parties had to agree to it. JE said that if someone did not want to do mediation that there was conflict coaching that coaches someone into living within close proximity to someone that is causing them distress and learning techniques to deal with it. JE said that it did have a high success rate.

Members expressed thanks to the officers for attending and giving evidence to them. JH said that they dealt with around 750 cases a year and that only some of them would come to the attention of councillors, and that would generally be the ones that hadn't gone right.

BF asked if someone contacted their MP about an ASB case if they would get a different answer. HW said not at all. JE said that actually MP inquiries gave a good opportunity to audit cases as he would look through the case before responding.

JH updated members on the survey that had gone out to ask residents who had reported ASB for their views on how their cases were handled.

The meeting finished at 16:00

[1] Extract of Meeting Three minutes: "Hyde were really keen on, and they have found quite effective, was to serve a notice for breach of tenancy if they believed there was a body of evidence that there was a significant breach of tenancy. But that this was not done with the objective to evict but as a warning that the behaviour is a breach of tenancy and could result in eviction. CK said that it was a sobering reminder to people that their behaviours can put tenancies at risk."

ASB Task & Finish Group Evidence Gathering Session Minutes
30th April 13:00-14:30

Present: Cllr Julie Cattell, Cllr Sam Parrott, Cllr Ellen Mcleay, Cllr Bridget Fishleigh, Angela Stretton (OPC),

Witnesses: Victoria Paling, BHCC Customer Experience Lead, Richard Tuset, BHCC Director of Commissioning and Communities, Siobhan Bowstock, BHCC Senior Community Safety Caseworker, Brent Schwarz, BHCC Head of Health & Safety Wellbeing.

Witness 1: Victoria Paling, BHCC Customer Experience Lead

VP said that the term complaints could be confusing as saying that you are complaining is not the same as the formal complaints process. For example a call about ASB is a service request for housing colleagues to deal with the ASB issue, not a complaint. If the resident were unhappy with the response to their request, then it becomes a complaint. Because the formal complaint has to be about the action or inaction of the council service. VP said that it's only relatively recently that the Housing Opportunity has clarified that any expression of dissatisfaction about what we've done or haven't done must be logged as a formal complaint, and that in practise is not yet completely embedded across all landlords.

VP said that briefings were given to staff to understand this and that this has seen an increase the number of complaints.

JC asked how the staff were coping with the increase. VP said that it was a struggle, which was reflected in the response times. She said that stage 1 complaints are dealt with by service managers and stage two complaints go to her team. VP said that if residents were still unhappy they could then go to the Ombudsman. VP said that Housing were funding additional capacity within her team to deal with the additional complaints.

JC asked about timeframes. VP said that one of the Ombudsman's findings was on timeframes as there is no set timeframes within housing policy and so where the staff may think a week is a reasonable timeframe the resident may not.

JC asked if there was a hierarchy of complaints. VP said that there was not a urgency or complexity rating for complaints and that they were dealt with according to the Housing Ombudsman's framework. She said that the complaints process was not an emergency service. Service complaints could be decided to be time critical and acted upon by housing staff.

BF asked what percentage of stage 1 complaints were ASB related in housing. VP said that about 280 stage one complaints had been made in Housing, with around 20 specifically about ASB, however this may not cover all of the complaints about ASB as there are other categories such as unhappy with outcome, which may include ASB. VP said that ASB was one of the higher areas for escalation because people wanted the complaint to deal with the issue, whereas it only checks that the council have done things correctly. VP said that it was therefore good to compare with other local authorities and said that last year's performance specifically around ASB complaints was that the council performed 4% better than other local authorities and 6% better for the average of other landlords with the same number of properties. VP said that 67% of the ASB issues that were brought to the Ombudsman, they agreed that the council had not done things perfectly. Whereas that compared to the national average of 70% or similar sized landlords or 71% for other local authorities.

SP asked if there was a breakdown of the 67%. VP said that they were broadly about timeliness of responses or that the council's assessment of what was a reasonable response timeframe was too long. VP said that they would welcome greater guidance from the Ombudsman.

SP asked about resources for complaints. VP said that Stage 1 would be dealt with by the service manager who should have some knowledge of the case and staff, but once the complaint escalates to Stage 2 and the Ombudsman it becomes very resource intensive. VP said that her team was around 2 FTE.

BF said everybody knows that there are nightmare tenants, but the problem is like they don't respond and won't moderate their behaviour and there's little the council can do and there's a backlog in the courts, etc and if this is something that VP recognised as well. VP said that there are often scenarios where both parties have vulnerabilities and perhaps the person who is perceived as the perpetrator is more significantly vulnerable. And we would very rarely have the evidence to support formal tenancy action against that individual. VP said it was a really challenging balancing act as the council had a duty of care to all tenants.

AS asked about expectation management. VP said that communication was key, even if they were not able to resolve issues but to make sure people feel listened to.

EM asked if the council supported victims enough, with them often feeling that more support goes to perpetrators. She asked what more could be done? VP said that she could not answer that as it would need to come from housing colleagues, as her team looked at if the council has followed the process and not looking after people. VP said that they had to use words like 'upheld' or 'not upheld' in correspondence, but this felt impersonal and upsetting. She said that they were working on empathy within the framework of having to use such words.

EM asked about communication with the housing team after complaints. VP said that they would send them a copy of the response and if the complaint is upheld that they should be looking for any learning or service improvements or actions that can put in place to mitigate the faults that were found. Sometimes it is just an action because sometimes it is just human error.

JC asked if these were reviewed. VP said that Genette [Laws, Corporate Director for Housing and Adult Social Care] chaired the quarterly Better Landlord Board and bring those priority service improvements that have been identified through complaints at all stages. These are then prioritised and they're then tracked with action owners and dates to take forward.

JC asked if a report went to Audit & Standards Committee. VP said that it did not, because of the timings of the meetings and lead in times for committee reports, but that an annual report goes to Cabinet.

AS asked about improvements to actually making a complaint, particularly offline. VP said that there was a phone number that could be used to make complaints and that the number was available both online and in the quarterly housing magazine. AS asked about ongoing contact with a complainant. VP said that it was generally done by email, or it can be done by post. She said that if there are reasons that people are unable to read or compute, then they would look to find other ways of giving updates or responses.

EM was keen to see reports on the service improvements going to either Audit and Standards or to a scrutiny committee, and thought that there was potentially a recommendation there. She also spoke about the possibility of letting residents know of any service improvements that come about from their complaints. VP said that she would think about the possibility of direct feedback to residents. She said that They had thought seriously about going to Audit and Standards committee but the lead in times for the committee and the work of the reports never worked out. She said that if they did it would be for information after the fact rather than anything that could be changed.

Witness 2: Richard Tuset, BHCC Director of Commissioning and Communities,
Siobhan Bowstock, BHCC Senior Community Safety Caseworker

RT introduced himself and SB, saying that they were a small team covering the city dealing with ASB in private settings.

SB said that in a mixed tenancy situation the housing team would lead on it with the community safety team providing consultative input or in exceptional circumstances a coordination role if multiple agencies were involved.

SB said that it was a small team of five caseworkers who lead the local authority's input into multi-agency responses to public place disorder and that between them they had around 70% of the city's housing stock as well as the public place ASB and so had to work smarter.

SB said that the service came about following legislation in the early 2000s and before that there was not a statutory service. SB said that budget cuts over recent years have left some places in the country without the equivalent of the community safety team, with only maybe a community safety coordinator.

SB said that should a private sector tenant contact the service reporting ASB from a council tenant they are given the option either of remaining with her team as their point of contact, if that's what they would like, or the whole case being dealt with by Council Housing. The joint working agreement in place is that if there is any Council Housing involvement at all, Council Housing will lead on enforcement action because they have much larger service, larger income because of the kind of protective housing revenue account.

SB said that they do not use language of victim or perpetrator other than for public materials where it is a kind of shorthand for people to understand. Instead they talk about people whose behaviour is causing harm, people who are being harmed by other people's behaviour. This is because they aim to work as restoratively as possible.

SB spoke of the importance of consistent and direct communication, telling her team that if they are asked a direct question they should answer it directly not try to come up with a lengthy answer that ends up feeling like a fudge or like the question is being dodged. SB said that sometimes this meant having to explain legislation to people and what can legally be done or not done for them.

SB said that new legislation was on the way but being tweaked a lot so it was hard to say what actual changes it would mean. She said that if people were unhappy with

council policy applying legislation they should speak to their councillors, or if they are unhappy with the legislation they should speak to their MP.

SB said that proactive communication is really important including helping people to be able to communicate in a way that is best for them, not making them fit into set boxes. SB said that it was also important to maintain contact with people even if there is no update to give them. Checking in with people including after the conclusion of the case for up to six months.

BF asked if they provided mediation. SB said they would sometimes organise mediation sessions and would also sometimes provide restorative interventions themselves. She said that the team were all restoratively trained. She said it was important to carry out assessments of the support needs for all parties to find out the reasons for the behaviour.

SB said that it is extremely rare that some experiences the hate incident when they've never experienced one before. It's generally, even if that incident is technically not connected to the previous incidents that they have done, but then it is 100% part of the experience that they have. And so that one standalone experience connects way back to things that people of visible difference would have experienced throughout their life, unfortunately, in this country. SB said that being mindful of that in the way that they approach things by not using terms like it's a one-off incident, if actually for that person it's not, is really important.

BF asked if the complex case team in housing ever contacted her team for their expertise. SB said that they wouldn't ask them to come in and solve cases for them as the complex case team have a similar role with expanded housing management functions. SB said that it can be really useful just to kind of talk things through with someone else who has a similar role but maybe a slightly different perspective and bounce things off. We obviously have structures like the HASBAC and the JAGC where they can take things for multi-agency discussion, the advantage of that is the additional input from different perspectives.

EM thought it was very good that the community safety team were supporting victims for so long after the case had been closed as she believed that this was not happening for a lot of victims in social housing and wanted to see more of that brought into the housing side. EM said that this could possibly form a recommendation for the group. SB said that would be something for housing to comment on but that they had a lot of constraints on their resources that her team did not as their remit was not just ASB.

SB said that it was important to apologise when things went wrong and explain how things would be done differently in the future. This can make people feel quite relieved that they are getting transparency and accountability.

SP asked about opportunities for housing colleagues to work through case studies and workshop ideas of different ways to do things. SB said that there were a lot of new housing staff and that there may be gaps in terms of in depth knowledge of ASB tools and powers as well as practice. She said that they had done something similar in licencing which had been useful.

Witness 3: Brent Schwarz, BHCC Head of Health & Safety Wellbeing

EM said that there had been at least two instances where people were put on the clients of concern register out of frustration through their communication with officers. There was an incident where someone wasn't told that they were put on the list and after a formal complaint they were told they shouldn't have been put on it. She said it would be good to understand what the process should be.

BS said that the current process was under a review that had been recently initiated. He said that they were looking at the whole process and that links and ties in to nicely around the incident and accident reporting throughout the council for staff as well. The reason why that they were reviewing both of those is because at the moment they are intrinsically linked. When a staff member has an incident within the council, they report it through on the incident reporting form. And the same applies for clients of concern in terms of the register. So they would report the incident and they are given an option in terms of whether that individual should be considered for the register or not. Once an incident has been reported it would go to the head of service to review the request to add someone to the client of concern register.

BS said that they give guidance to these gatekeepers around the protocols of the client of concern register. Standard protocol and procedure around the policy is that every single client is notified of their inclusion if it comes to their inclusion. There is a standard letter template that should go out. There is an exception to that, which is where they feel that by informing that individual of their inclusion on the register, that it may cause more harm and increase the risk.

BS said that as the senior officer for the register he did not believe that the process was correct at the moment as they have identified things that shouldn't be happening, which is why it is being reviewed.

BS said that they are looking at rather than having heads of service as gatekeepers they could have a steering group who review inclusions, another would be that it is held in the central hub. Engagement is being undertaking with staff to find out their needs and concerns.

BS said that there were concerns that staff were not accessing the register when they should be.

BS said that gatekeepers are meant to be reviewing ongoing inclusion on the register so as not to keep people on it longer than they needed to be.

AS asked if there was any right of reply to allegations that lead to inclusion. BS said that the person would not be spoken to about it, and it is about risk management. He said that in some cases like he had done in previous local authorities, that the clients and customers should be engaged with saying, 'look, this is not going to be tolerated' or whatever the case might be. And therefore, we're reviewing this to see the appropriate action and so on. AS asked if any evidence was gathered or if they only took into account the report of the staff member. BS it was only the council side of the story, which was reviewed by the gatekeeper.

BF asked if the complex case team had been in contact with him. BS said that they had not.

BF asked about residents in Rottingdean with a problem neighbour and if they should report them to BS. BS said that the client of concern register was internal to look after the health and safety of council staff at work and that such things should be reported to community safety.

JC asked how many people where on the register. BS said he could not give an accurate number, which is another reason for the review, but said he believed it was in the hundreds.

SP said that there were hundreds of people on the register who had not been informed. BS said that the majority would have been informed but due to risk management some may not have been informed and that would be determined by a director or corporate director. He said that he and his team did regularly prompt gatekeepers to carry out reviews to ensure people are not on the register longer than needed.

AS asked if there was any criteria for removal. BS said that there was not as every case was different and it was up to the gatekeepers to make that decision, which is why they were senior officers.

GR explained that the client of concern register was a risk tool for operational council staff so that they knew, for example, not to go to someone's house alone, it did not mean that people go no service from the council.

SP said that there were concerns about the way the register was used may not be the way it should. BS said that that was one of the reasons that a review is being carried out.

EM welcomed the review and having more eyes on the register not just individual gatekeepers who could be subject to bias. EM said that she wondered if the council should be asking questions about why someone has communicated in an aggressive way, have emails been read more aggressively than they were intended. That maybe their aggression is out of frustration and being fed up. EM said that the possible changes sounded good.

Brighton & Hove City Council

People Overview & Scrutiny

Agenda Item 14

Subject: Next Task & Finish Group

Date of meeting: 14th July 2026

Report of: Chair of People Overview & Scrutiny

Contact Officer: Name: Luke Proudfoot
Email: luke.proudfoot@brighton-hove.gov.uk

Ward(s) affected: All Wards

Key Decision: No

For general release

1. Purpose of the report and policy context

- 1.1 Brighton & Hove City Council's constitution allows Overview & Scrutiny Committees to establish informal Task & Finish Groups to undertake in-depth reviews of specific issues.
- 1.2 This report presents People Overview & Scrutiny Committee with an idea for the next Task & Finish Group for approval.

2. Recommendations

- 2.1 People Overview & Scrutiny agrees to establish a Task & Finish Group on Customer Services with the terms of reference set out in Appendix 1.

3. Context and background information

- 3.1 Following the conclusion of the People Overview & Scrutiny's previous Task & Finish Group (TFG) on anti-social behaviour in social housing, the committee can begin a new TFG on a different topic.
- 3.2 Potential ideas for the next TFG were discussed at the March People Overview & Scrutiny Committee. There was no consensus at the meeting on a single topic, but the most favoured issues were aspects of young people's mental health and customer services.
- 3.3 Following the March meeting, the Chair explored the potential of these issues with the relevant council officers. The Chair has identified a TFG on customer services as her preferred option. This TFG would focus on the council's increasing reliance on a digital first model of interaction with customers, exploring what steps are being taken to increase digital inclusion, to improve the council's digital offer, and how the council will ensure equitable access to services for people who are not able to use digital services, for example by looking in depth at the council's face-to-face

advice and support offer. More detailed scoping is included as Appendix 1 to this report and a draft TFG Terms of Reference is included as Appendix 2.

3.4 Membership of the TFG will be chosen through political group whips.

3.5 The TFG will report its findings to the January People Overview & Scrutiny Committee.

4. Analysis and consideration of alternative options

4.1 People Overview & Scrutiny Committee is presented with a suggested topic for its next Task & Finish Group. The committee could choose not to pursue this suggestion, in which case support officers would seek to work with members outside the meeting to identify alternative issues which would be presented at the next meeting of the committee. This would mean that there would be a period of time where the committee was not actively running a TFG investigation.

5. Community engagement and consultation

5.1 No community engagement or consultation has been carried out at this stage. Committee members previously discussed ideas for the next Task & Finish Group topic at the March People Overview & Scrutiny Committee meeting.

5.2 Depending on the topic chosen and the wishes of the Task & Finish Group Members, community engagement may form part of the group's inquiry.

6. Financial implications

6.1 A task & finish group would be delivered using existing scrutiny resources

Name of finance officer consulted: Ishemupenyu Chagonda Date consulted: 02/07/2026

7. Legal implications

7.1 Part 2C para 9.1 of the Council's Constitution permits the People Overview & Scrutiny Committee to establish informal task & finish groups to undertake in-depth reviews of specific issues and report back to it.

Name of lawyer consulted: Victoria Simpson Date consulted: 03/07/26

8. Risk implications

8.1 None specifically for this scrutiny report and the establishment of a Task & Finish Group.

9. Equalities implications

- 9.1 None specifically for this scrutiny report and the establishment of a Task & Finish Group. If members choose to progress the suggested topic, the TFG will need to consider the barriers to people with protected characteristics access council services.

10. Sustainability implications

- 10.1 None specifically for this scrutiny report and the establishment of a Task & Finish Group.

11. Health and Wellbeing Implications:

- 11.1 None specifically for this scrutiny report and the establishment of a Task & Finish Group.

14. Conclusion

- 14.1 People Overview & Scrutiny Members are asked to agree their next Task & Finish Group topic.

Supporting Documentation

1. Appendices

- 1. Customer Services TFG Scoping Report
- 2. Customer Services TFG Draft Terms of Reference

People O&S TFG on Customer Services Scoping Paper

What is the issue?

Digital access is increasingly central to how residents interact with local authorities. Brighton & Hove City Council has adopted a clear direction of travel towards digital channels, self-service and integrated customer accounts through initiatives such as:

- MyAccount as the council's single customer account
- Ongoing development of online services and digital customer journeys
- Investment in customer contact technologies
- Use of digital tools to support service delivery
- Greater use of data and digital services across the organisation.

The BHCC Council Plan includes a priority to be “a responsive council with well-run services”. Developing a better digital offer for customers is a key part to delivering this priority and to achieving efficiencies which are integral to the successful delivery of the Council’s Medium Term Financial Strategy.

The key strategies supporting this shift are the Customer Experience Strategy and the Digital, Data and Technology Strategy (DDaT). Moving to a ‘digital by default’ model of customer service has the potential to deliver services more cost-effectively and also to better meet customer needs.

However, both the Customer Experience and DDaT strategies recognise that digital exclusion remains a significant issue. The Customer Experience Strategy specifically identifies digital exclusion as a key challenge, noting that some residents lack internet access, digital skills or accessible technology. The strategy commits the council to providing support, equipment, alternative access routes and staff training to assist digitally excluded residents. The DDaT Strategy highlights the need to ensure all resident groups benefit from digital technology while maintaining a customer-centred approach. The strategy promotes digital solutions but explicitly recognises that vulnerable residents may require tailored support and alternative routes to services.

The core question for a customer services TFG is to ask **“how effectively is Brighton & Hove City Council ensuring that residents who are digitally excluded can access services and opportunities, and what improvements are required to support an inclusive digital future?”**

Key Lines of Enquiry

Understanding the Scale of Digital Exclusion – what proportion of the city population is digitally excluded? Which groups are most affected? How is digital exclusion measured, and is there a shared definition of digital exclusion used across the council and with key local partners? Does the council fully understand the barriers that some groups of people face in accessing services? How does the council measure success in enhancing digital inclusion and reducing digital exclusion?

Digital Inclusion - What measures is the council taking to support people to use digital services, and how successful have these measures proven?

Digital Exclusion - What is the council's customer service offer to people who are unable to use digital services? Does this offer meet the varied needs of city residents, particularly in terms of people with protected characteristics? How confident is the council that the shift to digital has not led to disengagement by vulnerable people who need support, particularly people with relatively easy to address needs that will become hard to address crises without intervention?

Face-to-face services – The council has recently redesigned face-to-face support to focus resources in libraries. How successful is this initiative proving and how will it evolve? Is there a danger that reductions in face-to-face options mean we pick up fewer problems at an early stage? How accessible is our face-to-face offer for people with protected characteristics? Does the council have a coherent position on phone services?

The digitally reluctant – a significant percentage of local people may be able to use digital services, but are reluctant users – because they have limited digital skills or access, would rather talk face-to-face, because they believe council digital services are poorly designed etc. What is the council doing to encourage digital use by the digitally reluctant? What is the council doing to ensure that customer experience of digital services is a positive one? How is the council managing reputational risk associated with negative customer experience of digital services?

Partnership – how effectively does the council work with local public sector and VCS partners to ensure that approaches to digital inclusion and exclusion are aligned and that good practice is shared? How does the council work with VCS partners to maintain in-depth understanding of the barriers that particular communities face?

Best practice – what is the council doing to ensure it learns from good practice from other places, given that the shift to digital is nationwide?

Potential Witnesses

Witnesses could include Cabinet Members; BHCC officers responsible for customer service, IT&D, equalities; BHCC officers responsible for services with high volumes of customer contact (housing, ASC etc.); city public sector partners which interact with vulnerable people (e.g. NHS Integrated Care Board); local VCS partners including advice providers and organisations representing vulnerable people; best practice local authorities (potentially including Leeds CC, Camden LBC, Manchester CC).

Outcomes

The TFG will make detailed recommendations. These will be presented to People Overview & Scrutiny Committee, and if approved by the committee, will be referred to Cabinet and/or partners for consideration. These will be determined by the evidence received and cannot be predicted in advance. However, in terms of broad outcomes the TFG will seek to:

- Give elected members a better understanding of strategic thinking underpinning the council's digital shift and the work to reduce digital exclusion and enhance digital inclusion
- Gain assurance that the council has robust plans in place to support people who cannot readily access services via digital
- Gain assurance that the council is effectively managing the reputational risks associated with delivering poor or hard to use digital services
- Gain assurance that the council's approach to delivering face-to-face support and advice is effective and evidence-based
- Learn from best practice local authorities and public sector partners who have adopted innovative approaches to digital inclusion or exclusion
- Develop better links with key VCS partners across the city
- Gain assurance that the council will continue to evolve and improve its digital and face-to-face offers as the digital economy continues to grow and evolve.

Customer services Task & Finish Group, recommended terms of reference (draft)

1. Purpose

- 1.1. The purpose of the Customer Services Task & Finish Group is to scrutinise Brighton & Hove City Council's customer services, with a particular focus on the shift to digital access and on the measures being taken to ensure that all residents have equitable access to these services, for example via digital inclusion work and/or via the provision of alternative means of accessing services for those who continue to be digitally excluded. The group will develop a report with recommendations to improve further knowledge of the local issues that will be presented to the People Overview & Scrutiny Committee for agreement. People Overview & Scrutiny Committee will further refer the Task & Finish Group report to Cabinet and/or partners for consideration.

2. Status

- 2.1. The Task & Finish Group is an informal group that will report to the People Overview & Scrutiny Committee.

3. Areas of focus

- 3.1. The report could focus on the following areas:
- The council's shift to digital access to services
 - The council's plans to enable digital inclusion, ensuring that residents have the digital skills and confidence to access services
 - The council's plans to offer alternative means of accessing services for those who remain digitally excluded
 - Customer service best practice from other local authorities

4. Scope

- 4.1. To produce a report on council customer services in Brighton & Hove, including policy options to improve access to customer services.

5. Membership

- 5.1. Voting Members: Groups will be offered membership as follows: 3 Labour, 1 Green, 1 Conservative, 1 BH Ind or Independent member.
- 5.2. Non-voting members: People and/or Place co-opted members with an interest in the issue.
- 5.3. Any non-executive member may sit on a Task & Finish Group.

6. Meetings

- 6.1. Meetings will be chaired by the Chair of the People Overview & Scrutiny Committee who will be responsible for convening meetings of the Task & Finish Group.
- 6.2. The Group will meet on a basis to be determined by Group members.

7. Timeline

7.1. The Task & Finish Group report will be presented to the People Overview & Scrutiny Committee at its January 2027 meeting.