Customer Access Review – Full Assessment

Assessment details	
Assessment area	Housing Statutory Maintenance & Compliance Policy
Date of assessment	August 2025
Directorate and Service	Housing & Public Protection, Housing Services
Manager	Housing Maintenance Manager
Officer conducting assessment	Senior Housing Policy & Performance Officer

Step 1: Scoping the assessment	
1. What are the aims and objectives of the activity or proposal?	The aim of the Housing Statutory Maintenance & Compliance Policy is to provide guidance on the way in which Dartford Borough Council's ('the Council's') Housing Service will manage its responsibilities and legal obligations as required by the Health and Safety at Work Act 1974, and associated legislation, regulations, and guidance documents, with the aim of managing associated risks to all relevant persons utilising our assets and services. The specific objectives of the Housing Statutory Maintenance & Compliance Policy are: • To comply with applicable statutory requirements and health and safety regulations relating to repairs and maintenance; • To ensure that where applicable, statutory maintenance and improvements are completed right first time and in accordance within regulatory and government prescribed timescales; • To ensure a cost effective, planned approach to statutory maintenance that demonstrates an appropriate balance of planned and responsive works. Under the policy, a 'duty holder', 'responsible person' and 'deputies' are assigned to control and manage the risks associated with statutory maintenance. The policy explains the responsibilities of these roles.
2. Who will be affected by the activity or proposal?	The Housing Statutory Maintenance & Compliance Policy will affect Dartford Borough Council tenants, leaseholders, statutory maintenance service providers, and contractors.
3. How does the activity or proposal contribute to: **a) any key performance indicators?** **b) policies, values or objectives of Dartford Borough Council?**	a) The Housing Statutory Maintenance & Compliance Policy contributes to the following Corporate Plan 2024-2027 performance indicators: • HOU3 Proportion of Council homes that meet the Decent Homes Standard The Housing Service also monitors a range of key performance indicators in relation to repairs and maintenance:

DARTFORD
BOROUGH COUNCIL

Customer Access Review – Full Assessment

Step 1: Scoping the assessment	
	• HPI-5 Emergency repairs completed on time • HPI-6 Urgent repairs completed on time • HPI-7 Non-urgent repairs completed on time • HPI-8 Average time taken to re-let local authority housing • HPI-8b Re-let local authority housing • HPI-28 Number of properties where Decent Homes Standard component are beyond component lifecycle estimate • HPI-28a Number of non-decent homes compliant properties with disclaimers • HPI-30 Percentage of repairs completed on time • HPI-48 Energy efficiency of housing stock • HPI-66 Proportion of homes that meet the Decent Homes Standard The Housing Service is also required to collect and publish annual tenant satisfaction measures to which there are measures on keeping properties in good repair and maintaining building safety: • RP01 Proportion of homes that do not meet the Decent Homes Standard • RP02/1 Proportion of non-emergency responsive repairs completed within the landlord's target timescales • RP01/2 Proportion of emergency repairs completed within the landlord's target timescales • BS01 Proportion of homes for which all required gas safety checks have been carried out • BS02 Proportion of homes for which all required fire risk assessments have been carried out • BS03 Proportion of homes for which all required asbestos surveys or re-inspections have been carried out • BS04 Proportion of homes for which all required legionella risk assessments have been carried out • BS05 Proportion of homes for which all required communal passenger safety lift checks have been carried out • TP02 Proportion of respondents who have received a repair in the last 12 months who report that they are satisfied with the overall repairs service • Proportion of respondents who have received a repair in the last 12 months who report that they are satisfied with the time taken to complete the most recent repair • TP04 Proportion of respondents who report that they are satisfied that their home is well maintained • TP05 Proportion of respondents who report that they are satisfied that their home is safe

Customer Access Review – Full Assessment

Step 1: Scoping the assessment	
	b) The Housing Statutory Maintenance & Compliance Policy contributes to the Corporate Plan 2024-2027 ambitions to: • Ensure that our homes are well maintained and empower tenants to shape and influence their own communities. • Provide a high quality and responsive housing service that's built on respect for aspiring and existing tenants. We want to be practical, honest and straightforward in all the information and advice we give. • Strive for full compliance with the Regulator of Social Housing's consumer standards in delivering good quality homes and services to the tenants that live in our homes.
4. Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?	The Housing Statutory Maintenance & Compliance Policy and its delivery is intended to be compatible with the following relevant legislation and regulation: • The Health and Safety at Work Act 1974 • Landlord and Tenant Act 1985 • Homes (Fitness for Human Habitation) Act 2018 • Defective Premises Act, S.4 1972 • The Building Safety Act 2022 • The Fire Safety Act 2021 • The Fire Safety (England) Regulations 2022 • The Regulatory Reform (Fire Safety) Order 2005 • Management of Health and Safety Regulations 1999 • Technical Guidance HSG 274 -Legionnaires Disease • Institute of Engineering and Technology BS 7671 Wiring Regulations 18th Edition • Gas Safety (Installation and Use) Regulations 1998 • The Smoke and Carbon Monoxide Alarm (amendment) Regulations 2022 • The Control of Asbestos Regulations 2012 • The Water Supply (Water Fittings) Regulations 1999 • Legionnaires disease: The control of legionella bacteria in water systems. Approved code of practice and guidance on regulations L8 • The Electricity at Work Regulations 1989

Customer Access Review – Full Assessment

Step 1: Scoping the assessment	
	• The Electrical Equipment (Safety) Regulations 2016 • Control of Substances Hazardous to Health (COSHH) Regulations 2002 • The Lifting Operations and Lifting Equipment Regulations 1998 • Regulator of Social Housing Safety and Quality Standard (April 2024) • Decent Homes Standard 2006 • Housing Health and Safety Rating System 2006 • Social Housing (Regulation) Act 2023 • Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025 (Awaab's Law) As a social housing landlord, the Council is required to comply with the Regulator of Social Housing's Safety and Quality Standard. This standard requires the Council to take all reasonable steps to ensure the health and safety of tenants in their homes and communal areas. The Housing Statutory Maintenance & Compliance Policy links to the Housing Repairs and Maintenance Policy and other policies that cover specific areas of health and safety compliance, including: • Damp, Mould and Condensation Policy for Council Tenanted Properties • Fire Safety Policy • Asbestos Management Policy and Plan • Water Safety Management Plan and Policy Individual Customer Access Reviews have been undertaken on the above policies to address equality considerations in those particular areas.

Customer Access Review – Full Assessment

<table>
<tr><th>Step 2: Information collection</th><th></th></tr>
<tr><td>5. What do you know about the groups of people who will be affected? (i.e. demographic information in relation to the protected characteristic groups of age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment, marriage and civil partnership)</td><td>Tenant profile – The Council owns and manages a housing stock of 4,214 properties. Information in relation to profile of Council tenants (Tenant 1 data) is captured by the Council's Housing Service, as follows:
<table>
<tr><td rowspan="3">Sex</td><td>Male</td><td>33.85%</td></tr>
<tr><td>Female</td><td>66.03%</td></tr>
<tr><td>Unknown</td><td>0.12%</td></tr>
<tr><td rowspan="4">Age</td><td>18-24</td><td>1.59%</td></tr>
<tr><td>25-39</td><td>20.41%</td></tr>
<tr><td>40-59</td><td>38.22%</td></tr>
<tr><td>60+</td><td>39.78%</td></tr>
<tr><td rowspan="6">Race</td><td>White</td><td>67.72%</td></tr>
<tr><td>Asian or Asian British</td><td>1.45%</td></tr>
<tr><td>Black or Black British</td><td>1.47%</td></tr>
<tr><td>Mixed</td><td>2.00%</td></tr>
<tr><td>Chinese or other ethnic group</td><td>0.24%</td></tr>
<tr><td>Unknown/ prefer not to say</td><td>27.12%</td></tr>
<tr><td rowspan="2">Disability/ vulnerability</td><td>No disability/ vulnerability</td><td>79.16%</td></tr>
<tr><td>Disability/ vulnerability</td><td>20.84%</td></tr>
</table>
Leaseholder profile – There are currently 481 leasehold properties. The conveyancing process is managed by external bodies and legal transfers which do not collect personal data concerning the protected characteristics of new home owners. The Housing Service does not receive or hold any personal data regarding leaseholders other than name and address.</td></tr>
<tr><td>6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings</td><td>Internal consultation has been undertaken on the development of the Housing Statutory Maintenance & Compliance Policy.</td></tr>
<tr><td>7. Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups</td><td>The Council is committed to ensuring the voice of its residents is heard on matters that affect them. The Regulator of Social Housing places a requirement on social housing landlords to comply with the Transparency, Influence and Accountability Standard 2024, by ensuring that residents are given a wide range of opportunities to influence and be involved in the formulation of their landlord's housing-related policies and strategies. Consultation with Council tenants and leaseholders will be undertaken, as follows:</td></tr>
</table>

Customer Access Review – Full Assessment

Step 2: Information collection	
needs and views are taken into account?	1. All Council tenants will be invited to comment on the Housing Statutory & Maintenance Policy. 2. The Dartford Tenants' and Leaseholders' Forum (DTLF) will be invited to comment on the Housing Statutory & Maintenance Policy. The DTLF aims to ensure that the services delivered by the Council are accessible to all. The Forum works as a group to ensure that the views and housing needs of residents are recognised and addressed by the Council, and that those needs and views are placed at the centre of housing services delivery. 3. The Housing Advisory Board (HAB) will be invited to comment on the Housing Statutory & Maintenance Policy. The HAB considers reports on proposed policy, strategy and performance in relation to housing issues and makes recommendations to Cabinet as appropriate. The HAB includes representation from Council officers, elected Members and DTLF members.

Step 3: Assessing the equality impact

8. Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the Public Sector Equality Duty:

a) tackling unlawful discrimination
b) promoting equality of opportunity
c) promoting good relations

NOTES:
- The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration
- For existing activities, consider how they are working in practice for each relevant protected group
- For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group
- If there is no identified equality impact, please tick the 'No Impact' box and explain why in question 9
- If the equality impact is unclear, please tick the 'Unknown' box and explain why in question 9

Step 3: Assessing the equality impact

PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Age	Poor quality housing can have a significant detrimental impact on the health, safety and wellbeing of both adults and children. Housing in		☐	☐

Customer Access Review – Full Assessment

Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	**POSITIVE IMPACTS**	**NEGATIVE IMPACTS**	**NO IMPACT**	**UNKNOWN**
	poor condition is more likely to contain hazards that could create an unsafe environment for adults and children. However, adults and children should be positively impacted by the Housing Statutory Maintenance & Compliance Policy as it sets out the Council's management arrangements for property compliance in terms of how it will meet its responsibilities and duties as a responsible landlord to ensure that homes are good quality and to a decent standard.			
Disability	Poor quality housing can have a significant detrimental impact on the health, safety and wellbeing of people with a long-term illness or disability. It can exacerbate pre-existing physical and mental ill health. Housing in poor condition is more likely to contain hazards that could create an unsafe environment for people with long-term illness or disability. However, those with a long-term illness or disability should be positively impacted by the Housing Statutory Maintenance & Compliance Policy as it sets out the Council's management arrangements for property compliance in terms of how it will meet its responsibilities and duties as a responsible landlord to ensure that homes are good quality and to a decent standard. In accordance with the Council's Equality and Diversity Document Framework, the policy and information about how the Council complies with its statutory requirements and health and safety		☐	☐

Customer Access Review – Full Assessment

Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	**POSITIVE IMPACTS**	**NEGATIVE IMPACTS**	**NO IMPACT**	**UNKNOWN**
	regulations relating to repairs and maintenance can be provided in alternative formats, including Braille, audio tape and large print versions of documents. British Sign Language interpreting services can also be provided upon request. Calls can also be received via Relay UK.			
Sex			☒	☐
Gender reassignment			☒	☐
Race	In accordance with the Council's Equality & Diversity Document Framework, the policy and information about how the Council complies with its statutory requirements and health and safety regulations relating to repairs and maintenance can be provided in alternative formats including documents translated into other languages. Telephone and face-to-face language interpreting services can also be provided upon request.		☐	☐
Religion/Belief			☒	☐
Sexual Orientation			☒	☐
Pregnancy/Maternity			☒	☐
Marriage and Civil Partnership*	Not applicable as the policy does not apply in the context of employment.	Not applicable as the policy does not apply in the context of employment.	☐	☐

* Regarding the protected characteristic of Marriage and Civil Partnership – public bodies need to comply with the first aim of the Public Sector Equality Duty and only in the context of employment.

Customer Access Review – Full Assessment

Step 3: Assessing the equality impact	
9. If ‘no impact’ or ‘unknown’ was selected, please explain	There are no known circumstances where the Housing Statutory Maintenance & Compliance Policy will have a disproportionate impact on the protected characteristic groups of sex, gender reassignment, religion/belief, sexual orientation, and pregnancy/maternity. The main detail of the policy is to set out the key parties responsible and involved in statutory maintenance compliance. The policy provides the same level of service for all residents, regardless of any protected characteristics.
10. If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups	The Council works in partnership with contractors, consultants, statutory bodies to deliver its repairs and maintenance activities. There are no known circumstances where these partnership working arrangements will have a disproportionate impact on the protected characteristic groups. The policy sets out the key parties responsible and involved in statutory maintenance compliance thereby promoting transparency and accountability.
11. Any other comments	Any person who is not satisfied with the service they have received regarding statutory maintenance compliance or who believes they have been discriminated against can make a formal complaint to the Council using the corporate complaints process.

Step 4: Action plan

12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:
a) any gaps in information and consultation
b) how any negative impacts on equality will be mitigated or eradicated

a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?

Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
Views from all Council tenants on the draft Housing Statutory Maintenance & Compliance Policy	Invite comment and input on the draft policy from all Council tenants and leaseholders	Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy	October 2025	Details of the consultation and any amendments made to the draft policy as a result of the consultation will be included in the Cabinet report	Senior Housing Policy & Performance Officer

Customer Access Review – Full Assessment

Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
Views from the Dartford Tenants' and Leaseholders' Forum on the draft Housing Statutory Maintenance & Compliance Policy	Invite comment and input on the draft policy from the Dartford Tenants' and Leaseholders' Forum	Feedback will, at a formative stage, inform any further changes that may be required to the draft Management Transfer Policy in advance of seeking approval for the Policy	October 2025	Details of the consultation and any amendments made to the draft policy as a result of the consultation will be included in the Cabinet report	Senior Housing Policy & Performance Officer
Views from the Housing Advisory Board on the draft Housing Statutory Maintenance & Maintenance Policy	Invite comment and input on the draft policy from the Housing Advisory Board	Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy	October 2025	Details of the consultation and any amendments made to the draft policy as a result of the consultation will be included in the Cabinet report	Senior Housing Policy & Performance Officer

b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?

Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer

DARTFORD
BOROUGH COUNCIL

Customer Access Review – Full Assessment

Step 5: Decision making and future monitoring	
13. Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?	Head of Legal Services and Director of Housing & Public Protection
14. Is the subject of the Customer Access Review going to committee? If yes, include your findings in the committee report and attach this assessment to the report	☒ **Yes** ☐ **No**
15. How will you continue to monitor the activity or proposal on protected characteristic groups?	The Council will review the Housing Statutory Maintenance & Compliance Policy on a biennial basis or in line with legislative or regulatory changes. The policy will be monitored as per the key performance indicators set out under question 3.
16. When will you review this Customer Access Review?	New assessments will be undertaken on a biennial basis in conjunction with the review of the policy, or sooner, in the event of major legislative or operational changes.

Step 6: Final steps
17. Once this Customer Access Review has been approved, send this assessment to the Policy & Projects Officer
18. Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded

Reviewed by Legal Services:

J.Wenham

28.8.2025

Reviewed by Director of Housing & Public Protection:

28.8.2025

DARTFORD BOROUGH COUNCIL