

Customer Access Review – Full Assessment

Assessment details	
Assessment area	Tenancy Policy
Date of assessment	July 2026
Directorate and Service	Housing & Public Protection, Housing Services
Manager	Housing Development & Policy 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 Tenancy Policy is an existing policy that explains the types of tenancies that will be offered in properties owned and managed by Dartford Borough Council. It also sets out the approach to tenancy management, including interventions to sustain tenancies, to prevent unnecessary evictions, and to tackle tenancy fraud. The aims of the policy are to: • Grant the correct tenancy in compliance with the law. • Provide tenants in settled accommodation with security of tenure which supports their wellbeing and sustainable communities. • Provide effective tenancy management to help tenant sustain tenancies and prevent unnecessary evictions and homelessness. • Ensure the Council makes best use of its housing stock. • Ensure that statutory and regulatory responsibilities are met. • Ensure a consistent, clear and fair approach is taken. • To ensure that tenants and prospective tenants understand their rights and responsibilities. The policy has been reviewed to ensure it remains up to date, and this assessment has been carried out in conjunction with the review. The main proposed updates to the policy include the following: • That in accordance with the Domestic Abuse Act 2021, if a person has fled domestic abuse and they previously held a secure lifetime tenancy, their new tenancy will continue to be a secure tenancy. • New paragraph to explain use and occupation status where a household may be allowed to stay temporarily in a property following the end of a tenancy (and there is no right of succession) or where a joint tenancy has been ended by one of the joint tenants but the other former joint tenant has been left in occupation.

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	• New sections explaining: ○ the aims of the policy ○ how tenants can apply to transfer to another property – as set out in the Housing Allocations Policy, Housing Assignment Policy, and Management Transfer Policy. ○ how the Council operates the Downsize for Cash Scheme to support under-occupying tenants move to smaller properties, thereby assisting to free-up larger homes for families living in overcrowded housing – as set out in the Under-Occupation Policy. ○ how temporary and permanent decants of properties may be instigated – as set out in the Decant Policy ○ how tenants and the Council can end a tenancy. ○ where to find associated housing policies in relation to the allocation of tenancies and the delivery of landlord services.
2. Who will be affected by the activity or proposal?	The policy will affect Dartford Borough Council tenants and housing applicants.
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 Service monitors the number of applicants on the housing register including active and suspended applicants (Key Performance Indicator – HPI-27). b) The Tenancy Policy contributes to the Corporate Plan housing ambitions to: • 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 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 Regulator of Social Housing's Tenancy Standard requires registered providers of social housing to publish clear and accessible policies which outline their approach to tenancy management, including interventions to sustain tenancies and prevent unnecessary evictions, and tackling tenancy fraud, and set out: a) The type of tenancies they will grant. b) Where they grant tenancies for a fixed term, the length of those terms. c) The circumstances in which they will grant tenancies of a particular type. d) Any exceptional circumstances in which they will grant fixed term tenancies for a term of less than five years in general needs housing following any probationary period.

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	e) The circumstances in which they may or may not grant another tenancy on the expiry of the fixed term, in the same property or in a different property. f) The way in which a tenant or prospective tenant may appeal against or complain about the length of fixed term tenancy offered and the type of tenancy offered, and against a decision not to grant another tenancy on the expiry of the fixed term. g) Their policy on taking into account the needs of those households who are vulnerable by reason of age, disability or illness, and households with children, including through the provision of tenancies which provide a reasonable degree of stability. h) The advice and assistance they will give to tenants on finding alternative accommodation in the event that they decide not to grant another tenancy. i) Their policy on granting discretionary succession rights, taking account of the needs of vulnerable household members. The Council has discretion on the types of tenancies to offer. In 2021, the Council took the decision to end the use of flexible tenancies with a fixed term of five years and reverted to offering secure lifetime tenancies in all circumstances preceded by a 12-month introductory tenancy. The Tenancy Policy and its delivery is intended to be compatible with the Council's obligations consequent to all relevant legislation and regulations, but not limited to: • Housing Act 1985 • Housing Act 1996 • Localism Act 2011 • Equality Act 2010 • Prevention of Social Housing Fraud Act 2013 • Secure Tenancies (Victims of Domestic Abuse) Act 2018 • Domestic Abuse Act 2021

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Step 2: Information collection																																					
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)	<u>HOUSING SERVICE – PROFILE OF TENANTS</u> Tenant profile – The Council owns and manages a housing stock of 4,194 properties, of which there are 3,759 general needs properties and 435 housing scheme units for older people. Information in relation to profile of Council tenants (Tenant 1 data) is captured by the Housing Service, as follows: Age <table> <tr><td>Under 25</td><td>2.09%</td></tr> <tr><td>25 to 35</td><td>11.59%</td></tr> <tr><td>36 to 45</td><td>17.94%</td></tr> <tr><td>46 to 55</td><td>17.99%</td></tr> <tr><td>56 to 65</td><td>21.30%</td></tr> <tr><td>66 to 74</td><td>15.27%</td></tr> <tr><td>75 and over</td><td>13.54%</td></tr> <tr><td>Unknown</td><td>0.29%</td></tr> </table> Sex <table> <tr><td>Male</td><td>33.37%</td></tr> <tr><td>Female</td><td>66.63%</td></tr> </table> Race <table> <tr><td>White</td><td>54.80%</td></tr> <tr><td>Mixed</td><td>1.88%</td></tr> <tr><td>Asian or Asian British</td><td>1.35%</td></tr> <tr><td>Black or Black British</td><td>1.44%</td></tr> <tr><td>Chinese or other Ethnic Group</td><td>0.17%</td></tr> <tr><td>Unknown/prefer not to say</td><td>30.37%</td></tr> </table> Disability <table> <tr><td>No disability/vulnerability/support need</td><td>77.44%</td></tr> <tr><td>Disability/vulnerability/support need</td><td>25.56%</td></tr> </table> Housing register – In June 2026, there were 1,693 households on the Council’s housing register eligible to bid or waiting to be offered social housing, including properties from the Council or housing associations.	Under 25	2.09%	25 to 35	11.59%	36 to 45	17.94%	46 to 55	17.99%	56 to 65	21.30%	66 to 74	15.27%	75 and over	13.54%	Unknown	0.29%	Male	33.37%	Female	66.63%	White	54.80%	Mixed	1.88%	Asian or Asian British	1.35%	Black or Black British	1.44%	Chinese or other Ethnic Group	0.17%	Unknown/prefer not to say	30.37%	No disability/vulnerability/support need	77.44%	Disability/vulnerability/support need	25.56%
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Step 2: Information collection	
6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings	Consultation will be carried out to inform draft Tenancy Policy, as set out below in question 7.
7. Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?	<u>Housing register applicants</u> - Consultation on the draft updated Tenancy Policy will be undertaken with applicants on the housing register. <u>Council tenants</u> - The Council is committed to ensuring the voice of its tenants 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 will be undertaken, as follows: 1. All Council tenants will be invited to comment on the draft updated Tenancy Policy. 2. The Dartford Tenants' and Leaseholders' Forum (DTLF) will be invited to comment on the draft updated Tenancy 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. <u>Housing Advisory Board</u> - The Housing Advisory Board (HAB) will be invited to comment on the draft updated Tenancy 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 Dartford Tenant and Leaseholder Forum 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

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Step 3: Assessing the equality impact

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	The Tenancy Policy should have a positive impact on tenants and housing applicants by assisting them to understand the types of tenancies available and what is expected in their use to ensure homes are let in a fair, transparent and efficient way. Continuing the policy to grant secure lifetime tenancies (as opposed to fixed term flexible tenancies) gives security and stability to allow tenants to put down firm roots in the community thereby contributing towards fostering good relations and promoting strong and successful communities. It will give stability to both younger and older tenants as well as families with children. The Tenancy Policy sets out how the Council will provide services to support tenants, particularly those who are vulnerable. For example, attributes are used within the housing management system to record protected		☐	☐

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	characteristics and to flag household vulnerabilities. This ensures reasonable adjustments can be put in place to support the household.			
Disability	The Tenancy Policy should have a positive impact on tenants and housing applicants by assisting them to understand the types of tenancies available and what is expected in their use to ensure homes are let in a fair, transparent and efficient way. Continuing the policy to grant secure lifetime tenancies (as opposed to fixed term flexible tenancies) gives security and stability to allow tenants to put down firm roots in the community thereby contributing towards fostering good relations and promoting strong and successful communities. It will give stability to disabled tenants. The Tenancy Policy sets out how the Council will provide services to support tenants, particularly those who are vulnerable. For example, attributes are used within the housing management system to record protected characteristics and to flag household vulnerabilities. This ensures reasonable adjustments can be put in place to support the household.		☐	☐

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	The Council recognises that it is important that people with specific communication needs can obtain support for this when accessing services. In accordance with the Council's Equality and Diversity Document Framework, the Tenancy Policy and information about tenancy services 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	The Tenancy Policy sets out how the Council will provide services to support tenants, particularly those who are vulnerable. For example, attributes are used within the housing management system to record protected characteristics and to flag household vulnerabilities. This ensures reasonable adjustments can be put in place to support the household.		☐	☐
Gender reassignment	The Tenancy Policy sets out how the Council will provide services to support tenants, particularly those who are vulnerable. For example, attributes are used within the housing management system to record protected characteristics and to flag household vulnerabilities. This ensures reasonable adjustments can be put in place to support the household.		☐	☐

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Race	The Council recognises that it is important that people with specific communication needs can obtain support for this when accessing services. In accordance with the Council's Equality and Diversity Document Framework, the Tenancy Policy and information about tenancy services 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	The Tenancy Policy sets out how the Council will provide services to support tenants, particularly those who are vulnerable. For example, attributes are used within the housing management system to record protected characteristics and to flag household vulnerabilities. This ensures reasonable adjustments can be put in place to support the household.		☐	☐
Sexual Orientation	The Tenancy Policy sets out how the Council will provide services to support tenants, particularly those who are vulnerable. For example, attributes are used within the housing management system to record protected characteristics and to flag household vulnerabilities. This ensures reasonable adjustments can be put in place to support the household.		☐	☐

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Pregnancy/Maternity	The Tenancy Policy sets out how the Council will provide services to support tenants, particularly those who are vulnerable. For example, attributes are used within the housing management system to record protected characteristics and to flag household vulnerabilities. This ensures reasonable adjustments can be put in place to support the household.		☐	☐
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.

Step 3: Assessing the equality impact	
9. If 'no impact' or 'unknown' was selected, please explain	There are no known circumstances where the Tenancy Policy will cause a negative or disproportionate equality impact on the protected characteristic groups.
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 with the Kent Homechoice, which is a partnership of local authorities and housing associations that provide social and affordable housing in Kent. The partnership provides the platform for applicants to apply to the Housing Register and to advertise properties available to let. There are no known circumstances where these partnership working arrangements will have a negative disproportionate impact on the protected characteristic groups in respect of the delivery of Tenancy Policy.
11. Any other comments	

Step 4: Action plan
12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:

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Step 4: Action plan

- 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, leaseholders, DTLF, housing register applicants, wider public, and the Housing Advisory Board on the draft Tenancy Policy	Undertake a consultation exercise	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	September 2026	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

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 Deputy Chief Executive (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?	Equalities records are kept and monitored on a regular and systematic basis.

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Step 5: Decision making and future monitoring	
16. When will you review this Customer Access Review?	The Council will review the Tenancy Policy every three years or earlier to address legislative, regulatory, best practice or operational issues. A Customer Access Review will be undertaken in conjunction with the review of the policy.

Customer Access Reviews must remain on the website until the Policy or Service becomes out of date. The Customer Access Review must then be archived.

Reviewed by Legal Services:

J.Wenham

07.08.2026

Reviewed by Deputy Chief Executive (Housing & Public Protection):



06.08.2026