Customer Access Review – Full Assessment

Assessment details	
Assessment area	**Housing Competence and Conduct Policy and Housing Staff Code of Conduct**
Date of assessment	September 2026
Directorate and Service	Housing & Public Protection, Housing Services
Manager	Assistant Director of Housing
Officer conducting assessment	Senior Housing Policy and Performance Officer

Step 1: Scoping the assessment	
1. What are the aims and objectives of the activity or proposal?	**Housing Competence and Conduct Policy** The Housing Competence and Conduct Policy is a new draft policy setting out Dartford Borough Council's approach to ensuring that housing landlord service staff have the skills, knowledge, experience and behaviours to deliver a good quality service to its tenants. The policy aims to promote transparency for Council tenants in the approach to ensuring the competence and conduct of staff delivering landlord services. The objectives of this policy are to: • Ensure the Council recruits the best housing staff. • Ensure that staff feel supported and are equipped with the skills and knowledge to do their jobs effectively and professionally. • Provide residents with information they need to know around the professionalism of housing landlord service staff so they can hold the Council to account. • Ensure that residents are listened to, treated with fairness, respect and dignity, and always receive an excellent housing landlord service. • Develop housing landlord service staff's skills, knowledge and experience to continuously improve services. • Support compliance with the Regulator of Social Housing's Competence and Conduct Standard. The policy outlines how competencies are embedded in job roles and the recruitment process and how competence is further developed through staff training. The policy also outlines clear standards on conduct through the Council's core behaviours and codes of conduct. Staff are also given timely feedback on their performance on a regular basis through continuous performance reviews. Where staff are not performing well, plans are put in place to improve performance.

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Step 1: Scoping the assessment	
	Housing Staff Code of Conduct The Housing Staff Code of Conduct is a new draft code of conduct setting out the specific professional attitudes, behaviours and conduct needed for the housing landlord service to be of good quality. The Housing Staff Code of Conduct is in addition to and complements the corporate Employee Code of Conduct, which provides all staff across the Council, including housing landlord service staff, with an effective ethical framework within which to work and sets out the corporate standards expected from our staff. This includes meeting standards around, for example, disclosure of information, political neutrality, declarations of interest, use of financial resources, and relationships with other parties. The Housing Staff Code of Conduct states that housing landlord service staff must meet the following four standards in relation to their behaviours and conduct: 1. Core behaviours: To embed our corporate core behaviours into their day-to-day roles. 2. Skills, knowledge and professional development: To have the skills, knowledge and be committed to their own professional development to maintain and enhance their abilities in key competence areas. 3. Customer focused engagement: To take residents views into account in decision-making about how landlord services are delivered and communicate how residents' views have been considered. 4. Fair and equitable outcomes: To deliver fair and equitable outcomes for our residents.
2. Who will be affected by the activity or proposal?	The Housing Competence and Conduct Policy and Housing Staff Code of Conduct will affect Dartford Borough Council tenants and Housing Service staff overall. The policy and code of conduct is most relevant to staff delivering the housing management functions in the housing landlord service, including tenancy management, repairs, allocations, and resident engagement.
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 Competence and Conduct Policy and Housing Staff Code of Conduct contributes to the Tenant Satisfaction Measure that measures agreement by tenants that they are treated fairly and with respect. b) The Housing Competence and Conduct Policy and Housing Staff Code of Conduct contributes to the following 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 the tenants that live in our homes.

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Step 1: Scoping the assessment	
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 statutory framework for regulation by the Regulator of Social Housing is set out in the Housing and Regeneration Act 2008. The Social Housing (Regulation) Act 2023 amended the Housing and Regeneration Act 2008 to enable the Regulator to set a standard for social housing landlords in matters relating to the competence and conduct of individuals involved in the provision of services in connection with the management of social housing. The Government's policy around competency and conduct stems directly from evidence heard by the Grenfell Tower Inquiry, and their subsequent Social Housing Green Paper consultation, which highlighted that social housing tenants felt they were not listened to or treated with respect and courtesy when raising concerns about their housing. The Charter for Social Housing Residents (White Paper) then committed to a review of professionalisation in the social housing sector which concluded that the sector does need to improve the professionalisation of its staff. Additionally, the tragic death of Awaab Ishak due to damp and mould exposure in his home has been further impetus for change in terms of staff behaviours and attitudes towards tenants. Following public consultation carried out by the Regulator, the new Competence and Conduct Standard will come into force in October 2026. This means the Council, as a social housing landlord, must meet the following requirements: **1 – Required outcomes** 1.1 – Registered providers must: a) secure that their relevant staff have the necessary skills, knowledge and experience, and exhibit the behaviours needed, for the landlord services to be of good quality; and b) take appropriate steps to secure that the relevant staff of their services providers have the necessary skills, knowledge and experience, and exhibit the behaviours needed, for the landlord services to be of good quality. **2 – Specific expectations** 2.1 Registered providers must meet all applicable requirements as set out in Chapters 1 to 6 of the Government's Policy Statement on Qualifications Requirements for Social Housing. 2.2 Registered providers must have a written policy which includes:

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Step 1: Scoping the assessment	
	a) their approach to managing and developing the skills, knowledge, experience and behaviours of their relevant staff and how they will tailor this approach, as appropriate, to the different roles of relevant staff within their organisation; b) their approach to learning and development for their relevant staff. This must include how they ensure that their relevant staff maintain and demonstrate appropriate and up to date skills, knowledge, experience and behaviours in their roles; c) their approach to appraising and regularly reviewing the performance of their relevant staff, including their approach to managing poor performance; and d) the appropriate steps they will take to secure that the relevant staff of their services providers have the necessary skills, knowledge and experience, and exhibit the bhaviours needed, for the landlord services to be of good quality. 2.3 Registered providers must develop or adopt an appropriate code of conduct for their relevant staff and ensure it is embedded within their organisation. 2.4 Registered providers must ensure that the written policy and the code of conduct referred to in 2.2 and 2.3 are kept up to date, fit for purpose and are accessible to tenants. Tenants must be given meaningful opportunities to influence and scrutinise the development of the written policy and decisions relating to the adoption or development of the code of conduct.

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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)	**HOUSING SERVICE – PROFILE OF TENANTS** **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** 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% **Sex** Male 33.37% Female 66.63% **Race** 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% **Disability** No disability/vulnerability/support need 74.44% Disability/vulnerability/support need 25.56% **HOUSING SERVICE – TENANT SATISFACTION MEASURES** **Year** — **Agreement that the Council treats tenants fairly and with respect** 2023-24 76.2% 2024-25 74.9% 2025-26 76.2%

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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 the development of the Competence and Conduct Policy for the Housing Service and Housing Staff Code of Conduct, as set out below in question 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?	**Internal consultation** – Council officers within the Housing Service and Human Resources will be consulted in the development of the Housing Competence and Conduct Policy and Housing Staff Code of Conduct. **Tenant consultation** – The Council is committed to ensuring the voice of 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 will be undertaken, as follows: 1. All Council tenants will be invited to comment on the draft Housing Competence and Conduct Policy and Housing Staff Code of Conduct. 2. The Dartford Tenants' and Leaseholders' Forum (DTLF) will be invited to comment on the draft Housing Competence and Conduct Policy and Housing Staff Coe of Conduct. 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 draft Housing Competence and Conduct Policy and Housing Staff Code of Conduct. 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.

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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	The overall intended outcome of the introduction of competency and conduct requirements is that it will drive culture change in the social housing sector workforce, so tenants are more likely to be treated equally, fairly, with empathy and respect, and without stigma and therefore feel listened to by social housing landlords. As a result, the Housing Competency and Conduct Policy and Housing Staff Code of Conduct will have a positive impact on all protected characteristics groups represented in Dartford Borough Council managed housing in general.		☐	☐
Disability	The overall intended outcome of the introduction of competency and conduct requirements is that it will drive culture change in the social housing sector workforce, so tenants are more likely to		☐	☐

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	**POSITIVE IMPACTS**	**NEGATIVE IMPACTS**	**NO IMPACT**	**UNKNOWN**
	be treated equally, fairly, with empathy and respect, and without stigma and therefore feel listened to by registered providers of social housing. As a result, the Housing Competency and Conduct Policy and Housing Staff Code of Conduct will have a positive impact on all protected characteristics groups represented in Dartford Borough Council managed housing in general. 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 & Diversity Document Framework, information can be provided in alternative formats to people with sensory needs including, Braille, audio tape and large print versions of documents, and British Sign Language interpreting. Calls can be received via Relay UK.			
Sex	The overall intended outcome of the introduction of competency and conduct requirements is that it will drive culture change in the social housing sector workforce, so tenants are more likely to be treated equally, fairly, with empathy and respect, and without stigma and therefore feel listened to by registered providers of social housing. As a result, the Housing Competency and Conduct Policy and Housing Staff Code of Conduct will have a positive impact on all		☐	☐

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	**POSITIVE IMPACTS**	**NEGATIVE IMPACTS**	**NO IMPACT**	**UNKNOWN**
	protected characteristics groups represented in Dartford Borough Council managed housing in general.			
Gender reassignment	The overall intended outcome of the introduction of competency and conduct requirements is that it will drive culture change in the social housing sector workforce, so tenants are more likely to be treated equally, fairly, with empathy and respect, and without stigma and therefore feel listened to by registered providers of social housing. As a result, the Housing Competency and Conduct Policy and Housing Staff Code of Conduct will have a positive impact on all protected characteristics groups represented in Dartford Borough Council managed housing in general.		☐	☐
Race	The overall intended outcome of the introduction of competency and conduct requirements is that it will drive culture change in the social housing sector workforce, so tenants are more likely to be treated equally, fairly, with empathy and respect, and without stigma and therefore feel listened to by registered providers of social housing. As a result, the Housing Competency and Conduct Policy and Housing Staff Code of Conduct will have a positive impact on all protected characteristics groups represented in Dartford Borough Council managed housing in general.		☐	☐

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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 & Diversity Document Framework, information can be provided in alternative formats to people where English is not their first language including, documents translated into other languages and telephone and face-to-face language interpreting.			
Religion/Belief	The overall intended outcome of the introduction of competency and conduct requirements is that it will drive culture change in the social housing sector workforce, so tenants are more likely to be treated equally, fairly, with empathy and respect, and without stigma and therefore feel listened to by registered providers of social housing. As a result, the Housing Competency and Conduct Policy and Housing Staff Code of Conduct will have a positive impact on all protected characteristics groups represented in Dartford Borough Council managed housing in general.		☐	☐
Sexual Orientation	The overall intended outcome of the introduction of competency and conduct requirements is that it will drive culture change in the social housing sector workforce, so tenants are more likely to be treated equally, fairly, with empathy and respect, and without stigma and therefore feel listened to by registered providers of social		☐	☐

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	**POSITIVE IMPACTS**	**NEGATIVE IMPACTS**	**NO IMPACT**	**UNKNOWN**
	housing. As a result, the Housing Competency and Conduct Policy and Housing Staff Code of Conduct will have a positive impact on all protected characteristics groups represented in Dartford Borough Council managed housing in general.			
Pregnancy/Maternity	The overall intended outcome of the introduction of competency and conduct requirements is that it will drive culture change in the social housing sector workforce, so tenants are more likely to be treated equally, fairly, with empathy and respect, and without stigma and therefore feel listened to by registered providers of social housing. As a result, the Housing Competency and Conduct Policy and Housing Staff Code of Conduct will have a positive impact on all protected characteristics groups represented in Dartford Borough Council managed housing in general.		☐	☐
Marriage and Civil Partnership*	This assessment does not apply in the context of employment, therefore the protected characteristic group of marriage and civil partnership has not been subject to this assessment.	This assessment does not apply in the context of employment, therefore the protected characteristic group of marriage and civil partnership has not been subject to this assessment.	☐	☐

* 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.

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Step 3: Assessing the equality impact	
9. If 'no impact' or 'unknown' was selected, please explain	Not applicable
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 competence and conduct requirements also apply to relevant staff of the Council's services providers.
11. Any other comments	**Conclusion** – The Housing Competence and Conduct Policy Housing Staff Code of Conduct supports the Equality Act 2010 aims to advance equality of opportunity and to foster good relations. Overall, the policy is intended to have a positive impact on Council tenants as it sets out clear professional standards expected of housing landlord service staff which in turn contribute towards the delivery of good quality services and treating residents equally, fairly, with empathy and respect.

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, DTLF, and the Housing Advisory Board on the draft Housing Competency and Conduct Policy	Invite views on the draft policy from all Council tenants	Feedback will, at a formative stage, inform any further changes that may be required to the draft policy and/or code of conduct in advance of	End January 2027	Details of the consultation and any amendments made to the draft policy and/or code of conduct as a result of the consultation will be	Senior Housing Policy & Performance Officer

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Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
Housing Staff Code of Conduct		seeking approval for the policy		included in the Cabinet report	

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 Service 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?	Monitoring mechanisms have been outlined in the draft Housing Competence and Conduct Policy in order to measure the success of the approach to competence and conduct. This includes monitoring: • Self-assessment against the Competence and Conduct Standard • Training needs of housing landlord service staff • Training records and progress in gaining professional qualifications • Outcomes on appraising and regularly reviewing the performance of our housing landlord service staff, including positive and poor performance • Complaints about housing landlord service staff behaviour and lessons learned • Improvements to service delivery over time
16. When will you review this Customer Access Review?	The Housing Competence and Conduct Policy and Housing Staff Code of Conduct will be reviewed every three years or earlier to address legislative,

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Step 5: Decision making and future monitoring	
	regulatory, best practice or operational issues. New assessments will be undertaken every three years 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 **18.11.26**

Reviewed by Director of Housing & Public Protection:



03.11.2026

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