



May 2024

Dacorum Borough Council
External review:
Self-assessment
against the Consumer
Standards 2024/25

 Altair

Contents

1. Executive Summary	3
2. Introduction and Regulatory Context	5
3. Review of the self-assessment 2024/25	7
4. Conclusions	13
5. Appendix 1	
.....	
.....	13
Contact	
Details.....	
.....	14

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1. Executive Summary

- 1.1.1 Altair Consultancy and Advisory Services (“Altair”) have been commissioned by Dacorum Borough Council (“Dacorum”) to conduct an assessment of their self-assessment against the 2024/25 consumer standards.
- 1.1.2. In response to the new regulatory environment, Dacorum has conducted a self-assessment by conducting a forward look to new consumer standards, active from 1st April 2024 for the year 2024/25.
- 1.1.3. Altair has reviewed the self-assessment for the 2024/25 consumer standards. The assessment has been made in context of the proactive regulation that applies after 1st April 2024.
- 1.1.4. The documentation reviewed by Altair is set out in Appendix 1. In assessing the documentation, provided to Altair, consideration has been made in context of a more robust regulatory environment from 1st April 2024.
- 1.1.5. Our review has identified a range of differing findings and recommendations. We have approached the reporting of recommendations as follows:
- **Overarching recommendations** – for the entire approach for self-assessment. Overarching recommendations are outlined in the executive summary.
 - **Detailed recommendations** – against the individual consumer standards are outlined in individual chapters in this report.
 - **Redrafting recommendations** – such as areas of clarity and error have been directed to Dacorum officers.
- 1.1.6. Table 1 sets out our overarching recommendations across the self-assessment.

Table 1: our recommendations

Element of review	Overarching recommendations
2024/25 self-assessment	<p>Recommendation 1: The self-assessment could be improved further by the addition of further information on how the Cabinet, Senior Leadership Team, and the Housing and Community Overview and Scrutiny Committee and the Strategic Planning and Environment Overview and Scrutiny Committee are sighted in relation to performance, such as providing evidence of the reports and frequency and whom they are reviewed by.</p> <p>Recommendation 2: The self-assessment supporting documents, including policies and strategies, are kept up to date and available to tenants and other stakeholders, if requested or on the website. That a process is in place for ongoing management of keeping them up to date.</p>

Conclusions

- 1.1.7. The approach to the self-assessment by Dacorum is proportionate considering regulatory expectations.

- 1.1.8. In the consumer standards self-assessment, there has been high-level information has been provided to aim to demonstrate compliance.
- 1.1.9. Our findings in relation to the oversight of Safety and Quality elements highlight an area of concern that Dacorum should consider further, particularly what appears to be a lack of sight of key 'Big 7' compliance areas and the delivery of associated actions.
- 1.1.10. The 2024/25 self-assessment offers an opportunity to the Cabinet, Senior Leadership Team and Scrutiny Committees to further establish the monitoring of performance and assessment of the delivery of actions. They also can provide an aide memoire to the Cabinet, Senior Leadership Team and Scrutiny Committees for the programmed inspection.

2. Introduction and Regulatory Context

- 2.1.1. The Regulator of Social Housing (“RSH”) is responsible for ensuring that social landlords deliver against the consumer standards. Until April 2024, regulatory intervention was set at a high threshold identified as the serious detriment test. This meant that the RSH would only assess consumer matters where there was a risk that a landlord’s approach would cause ‘serious detriment’ to their residents.
- 2.1.2. The Social Housing (Regulation) Act 2023 brought in a proactive role for the RSH on regulating the consumer standards. With effect from 1st April 2024, it gave the RSH new powers to inspect RPs and to intervene when they believe necessary, removing the ‘serious detriment test’. The regulator also has new enforcement powers and tools to do so.
- 2.1.3. The RSH will now regulate the consumer standards with the same powers and proactivity as they have done with the economic standards for Private Registered Providers (Governance and Viability, Rent and Value for Money). This will be through programmed inspections, held every four years.
- 2.1.4. Programmed inspections are new to local authorities, following inspection, the regulator will issue a consumer grading¹. Dacorum are experiencing a programmed inspection in wave 1 of the RSH inspection programme.
- 2.1.5. In addition to programmed inspections, the threshold for self-referral on consumer matters has been clarified in the Transparency, Influence and Accountability standard, with landlords expected to communicate with the regulatory in a timely matter on all material issues that relate to non-compliance or potential non-compliance with the consumer standards.
- 2.1.6. The consumer standards have been revised in readiness for the proactive environment. The new set of consumer standards were published on 29th February 2024.² For landlords, this means that for organisations, there has been a period of uncertainty in relation to the final versions of standards.
- 2.1.7. In delivering in the new regulatory environment, the focus will remain on the sight of delivery by Cabinet and the Senior Leadership as well as the assurance around key areas of risk.

Dacorum’s self-assessment approach

- 2.1.8. The self-assessment against the consumer standards is centrally coordinated by the Head of Strategy Quality and Assurance and the Strategy Quality and Assurance Manager – Housing through engagement with relevant services to provide information and data to support the drafting of the self-assessment.

¹ RSH (2024) Our approach to regulatory judgements and gradings [How we approach regulatory judgements and gradings - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/how-we-approach-regulatory-judgements-and-gradings)

² RSH (2024) Consumer Standards [Proposed Consumer standards \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/publications/proposed-consumer-standards)

2.1.9. The self-assessment for 2024/25 has focused on the current position and a forward-looking self-assessment in consideration of the changed standards from 1 April 2024 and a changed regulatory context.

2.1.10. In self-assessing against the consumer standards, Dacorum has also taken into account the RSH Code of Practice which provides additional guidance on how the provider can meet the consumer standards.

3. Review of the self-assessment 2024/25

Overarching findings

- 3.1.1. Self-assessment has been carried out by officers against the current consumer standards. All four assessments have been produced on single document with a section for each standard.
- 3.1.2. Each commentary (“Dacorum’s position”) provides an assessment against the specific expectations and expected outcomes set by the regulator and detail of the assurance against the elements.
- 3.1.3. Across the self-assessments, a comprehensive commentary and some links to source documentation is provided on the majority of the elements of the standards.
- 3.1.4. The self-assessment has identified a gap in resident involvement and delivering on the expectations of the standard. An action plan has been provided for the Transparency, Involvement and Accountability Standard with timescales and leads.
- 3.1.5. Supporting documentation has been provided of the SMART Review self-assessment of resident involvement.
- 3.1.6. Across the self-assessment we have found evidence of policies and procedures, of which a number are out of date or due review.
- 3.1.7. The self-assessments do not consistently outline how Cabinet and Senior leadership are sighted on the delivery against the standards, nor are relevant delegations and reporting for non-compliance.

Overarching recommendations

Recommendation 1: The self-assessment could be improved further by the addition of additional information on how the Cabinet, Scrutiny Committees and Senior Leadership Team are sighted in relation to performance, such as providing evidence of the reports and frequency and by whom they are reviewed.

Recommendation 2: The self-assessment supporting documents, including policies and strategies, are kept up to date and available if requested or on the website. That a process is in place for ongoing management of keeping them up to date.

Findings – Safety and Quality Standard

3.1.8. Our findings for the Safety and Quality Standard have been assessed as follows:

- Providers are required to identify and meet all legal requirements that relate to the health and safety of tenants in their homes and communal areas. The self-assessment outlines that there is monthly reporting of the Health and Safety ‘Big 7’ compliance however, oversight of performance of both the certification process and addressing hazards is not clear in the assessment.
- The self-assessment refers to a Health & Safety Board that oversees compliance, but it does not indicate how frequently it meets; the last meeting date provided in the self-assessment was

over five months ago at time of reporting. It does not advise how progress with urgent actions are monitored between meetings.

- There are quarterly health and safety reports completed by heads of service and an estate inspection programme and a tracker of these. The assessment confirms that compliance reports are provided to the Senior Leadership Team on a quarterly basis.
- Providers are required to ensure that all required actions arising from health and safety assessments are carried out within appropriate timescales, the assessment advises there is a compliance tracker and that there is an internal audit regime. It does not confirm if this relates to homes, communal areas, or both or the oversight for compliance.
- There is a strategy in place to ensure that Dacorum has an accurate record of the condition of properties at an individual property level based on physical assessment and that this is in progress with target dates. However, oversight of the activity is not clear in the assessment.
- There is information in the assessment on where stock condition data is held and how it will be used for reporting and to prioritise planned programmes and investments.
- The assessment advises that the stock condition data will be used to inform and determine planned maintenance programmes from April 2024. The self-assessment confirms that stock condition data will be used to inform investment and disinvestment opportunities but does not advise of the interim arrangements until a full suite of data is available in 2027/28.
- Decent Homes performance has been provided in the self-assessment but there is no confirmation about whether tenants whose homes does not meet the standards is aware of this or the plans to achieve compliance.
- The assessment confirms that regular estate inspections are completed but not the frequency or details of monitoring. Providers are expected to understand and fulfil their maintenance responsibilities in respect of communal areas the self-assessment has identified that further information is required in the assessment.
- Landlords are required to provide a range of ways to report repairs and set out clear timescales for the delivery of repairs. The self-assessment confirms how tenants can report repairs and maintenance issues directly to the contractor and offers various options. KPI reporting is in place that monitors the delivery of timely repair through the contract management update, but it is not clear on the frequency of the monitoring. The assessment confirms that timescales are given at the time of reporting, however, it is not clear is this is due date for repair or appointment date for repair.
- The Tenant Leaseholder Committee minutes from November 2023 indicate that there has been some dissatisfaction with the contractor due to complaints about poor communication, repeat visits, delays to complete repairs. Dacorum is currently undergoing a robust procurement process to appoint a new contractor by 2026.
- In the response supporting information is provided for the standard and some statistical detail to support the assurance of compliance.

Detailed recommendations – Safety and Quality Standard

3.1.9. Recommendations for consideration for the self-assessment are:

- Ensuring that the self-assessment contains robust information on the monitoring of health and safety requirements, to give assurance that there is proactive management of compliance and required actions. Information on the internal audit regime of the compliance tracker would support the assessment, including frequency.
- Include information within the self-assessment on any other sources used to assess and record the condition of homes as proposed in the Code of Practice including complaints, EPCs and repairs.
- The self-assessment suggests some properties that do not meet Decent Homes Standard and confirms they are reviewed. Confirmation about whether affected residents have been kept informed could be included.
- The safety of tenants should be considered in the design and delivery of landlord services, the assessment could include information on the expectations of contractors and front-line staff or where this is communicated. It could also include more information on how Dacorum ensure safety of tenants is taken into account when designing or introducing new services, as well as the process for contractors to highlight concerns.
- Further information could be provided on how tenants are kept informed on progress with repairs in complex cases, where there are multi-trades and the timescales for providing a new appointment for follow up work when an appointment cannot be made on site.
- The missing information for 2.3.4 on registered providers understanding and fulfilling their maintenance responsibilities in respect of communal areas should be completed.
- Provide information on the interim asset management arrangements pending the collection of the full decent homes data.

Findings – Transparency, Influence and Accountability Standard

3.1.10. Detailed findings of the self-assessment are:

- Each area of the standard has been addressed and relevant examples of activities by Dacorum to demonstrate related activities to deliver on the standard.
- For communication and information, there are details of what is in place currently and ideas in progress/development.
- Some of the information that was available on Dacorum's website was out of date. Most of this has now been updated or removed however, where removed, this has left some gaps.
- The assessment identifies some oversight by Cabinet and Overview and Scrutiny Committee confirming that they ensure that EDI and human rights have been considered in policies and strategies.
- It has been acknowledged that the resident involvement activities have undergone a review by TPAS to ensure that they are fit for purpose and further development is underway. Supporting evidence of the review and finding has been provided.
- The Complaints and Feedback Policy on that has been provided website has not yet updated in line with the new complaints handling code, which was introduced on 1st April 2024, self-assessment against the new code is due on 30th June 2024.

- There were some gaps in the self-assessment where information was not available at the time.

Recommendations - Transparency, Influence and Accountability Standard

3.1.11. Some recommendations for consideration to strengthen the assessment are:

- Supporting statistical data on the demographic data for tenants such as what percentage of demographic data is held and how it is kept up to date to show that robust information is held to form the basis for considering the diverse needs of tenants. Where there are gaps, other data sources (census and English Housing Survey) can be used in line with the Code of Practice
- Outlining whether tenants have been involved in the review of key communications (tenant handbook, standard letters) to ensure that the information is clear, accessible, and relevant.
- An assessment be considered for completion reviewing the profiling/demographic data of tenants accessing services to see if there are any gaps or unexpected under-representation of people with different characteristics accessing services.
- The self-assessment has advised that guidance is needed to outline Dacorum's approach to Right to Manage and it is recommended that this is completed, and awareness is raised among front line officers.
- Provision of some data to support the examples of compliance would assist in providing evidence of compliance. Consideration could be given to utilising relevant TSM results in future assessments.
- For some of the projects that are being undertaken, it is recommended that leads and target dates are provided e.g. the introduction of CX feedback to ensure delivery.
- It is recommended that more information is provided about the outcomes of activities and initiatives.
- It is recommended that more information is provided, if it is available, on how tenant involvement or feedback has influenced decision making. Some examples of key initiatives could be included, again to show outcomes. Consideration should be given to all changes to the landlord service and how tenant feedback and engagement has informed delivery.
- If there is a reasonable adjustment policy or strategy in place, a copy could be provided to support the evidence of ensuring accessibility and appropriate communication with tenants.
- It is recommended that details are provided on the types of complaints received and how lessons have been learned from complaints will be available to tenants in line with these requirements in the standard.
- That the gaps identified by Dacorum in the self-assessment identified are completed.

Findings - Neighbourhood and Community Standard

3.1.12. Findings for the Neighbourhood and Community Standard have been assessed as:

- There are initiatives happening with shared spaces and the Clean, Safe and Green team, but it does not reference if there is a knowledge of shared spaces and what other partner agencies are involved and what agreements are in place with them ensuring the safety and cleanliness of the spaces.
- The assessment refers to block champions but not how many there are, percentage coverage, and how outcomes are monitored.

- The self-assessment links to the Housing Strategy and the Local Plan is under development with updates on the website.
- The self-assessment refers to the Anti-Social Behaviour (ASB) Policy. The new ASB Policy went to the Housing Community Overview and Scrutiny Committee in March 2024. Checks indicate that an ASB policy is currently not available on the website although there is information on reporting ASB allegations. This would also include hate crime.
- Dacorum have identified some actions in the self-assessment to address gaps in compliance.
- Domestic Abuse Policy is available and up to date.

Recommendations – Neighbourhood and Community Standard

3.1.13. Recommendations for consideration are:

- Provision of some information on outcomes and where they are monitored or links to the reports.
- Providing more information on Dacorum's approach to hate crime and the new Anti-Social Behaviour Policy is up to date and provided on the website.
- Confirm how ASB case handling is monitored and acted on. The assessment refers to actions plans and the approach to keeping tenants informed however, in TSM quarter one data provided shows a satisfaction rate of 45%.
- Applying deadlines/target dates and leads to the actions identified in the self-assessment to ensure delivery.

Findings - Tenancy Standard

3.1.14. Overall findings for the self-assessment are:

- Some of the information and evidence provided may be a central local authority function rather than the housing department, for example activities of the council's central housing options team.
- There is no information provided on checks completed before a tenancy starts and during a tenancy to tackle or prevent tenancy fraud, as suggested in the Code of Practice.
- Some of the policies referenced to support the assessment are not available on the website or easy to locate.
- Self-assessment refers to several initiatives to support tenancies and prevent evictions. Information is not provided on the outcome or impact of these initiatives, for example number of evictions prevented.
- The Tenure Strategy confirms that flexible tenancies are no longer used yet does not outline the approach to handling current flexible tenancies.

Recommendations – Tenancy Standard

3.1.15. Recommendations to be considered for the self-assessment are:

- More supporting information could be provided including links to policies and strategies that support the assessment and any statistical data to demonstrate delivery of outcomes. This could include data on tenants who downsize and the allocation of adapted properties, for example.
- It is recommended that more information is provided on anti-fraud activity and information on cases identified are resolved to demonstrate outcomes.
- Consider if the CORE reporting is utilised to understand local housing need for example who is being rehoused, from where, what properties are becoming available and how many offers are being made to indicate level of demand or fitness of stock.
- Provide the information identified by Dacorum to be added in the self-assessment for example the detail on tenancy sustainment.
- The self-assessment contains reference to activities, initiatives, policies and strategies to show compliance with the standard. It is recommended that consideration is given to the provision of some performance data or links to performance reports and confirmation of who monitors. This is to demonstrate outcomes from the activities, policies and that they are being delivered and making a difference to services and tenants.

4. Conclusions

- 4.1.1. The approach to self-assessment by Dacorum is proportionate in light of the regulatory expectations with a focus on ensuring that the 2024/25 assessment is made considering future expectations.
- 4.1.2. In the self-assessment there has been a high-level of information provided to demonstrate compliance. Additional detail could be provided as outlined in this report to further support the assessment.
- 4.1.3. Our findings in relation to the oversight of Safety and Quality elements highlight an area of concern that Dacorum should consider further, particularly what appears to be a lack of sight of key 'Big 7' compliance areas and the delivery of associated actions.
- 4.1.4. Some of the gaps should be completed where the information was not available at the time of the assessment.
- 4.1.5. The assessment is for internal and external assurance, including the Regulator and so it is recommended that more detail is provided. In addition, that the supporting documentation is provided, if requested.
- 4.1.6. The 2024/25 self-assessment offers an opportunity to the Cabinet, Senior Leadership Team and Scrutiny Committees to further establish the monitoring of performance and assessment of the delivery of actions. They also can provide an aide memoire to the Cabinet, Senior Leadership Team and Scrutiny Committees for the programmed inspection.
- 4.1.7. It is recommended that Dacorum ensure that the supporting documentation is available and up to date and that there is an identified ongoing review process to ensure this is maintained.

Appendix 1– Reviewed Documentation

Theme	Reviewed Documents (including linked and source documentation)
Consumer Standards	Safety and Quality Standard Self-Assessment
	Transparency, Influence and Accountability Standard Self-Assessment
	Neighbourhood and Community Standard Self-Assessment
	Tenancy Standard Self-Assessment

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