

Slough Borough Council

Report To:	Cabinet
Date:	28 May 2026
Subject:	Voluntary undertaking with the Regulator of Social Housing
Lead Member:	Lead Member for Housing, Homelessness and Communities – Cllr I Ahmed
Chief Officer:	Will Tuckley, Chief Executive
Contact Officer:	Victoria Boateng, Director of Housing
Ward(s):	All
Key Decision:	YES
Exempt:	NO
Decision Subject to Call In:	YES
Appendices:	Appendix 1 - Voluntary Undertaking with the Regulator of Social Housing

1. Summary and Recommendations

This report seeks Cabinet approval to enter into a Voluntary Undertaking with the Regulator of Social Housing, following the Regulator's June 2025 C3 regulatory judgement.

Recommendations:

Cabinet is recommended to:

1. Approve entering into a Voluntary Undertaking with the Regulator of Social Housing, as set out in the appendix 1.
2. Delegate authority to the Chief Executive, in consultation with the Lead Member for Housing, to make minor amendments to the Voluntary Undertaking and to sign it on behalf of the Council.
3. Note that quarterly reports will be presented to Cabinet updating on compliance with the Voluntary Undertaking and providing a progress update in relation to improvements in housing management.

Reason:

Entering into the Voluntary Undertaking provides a clear and credible response to the Regulator of Social Housing's June 2025 C3 regulatory judgement, which identified serious failures in the Council delivering the outcomes of the consumer standards and that significant improvement is needed. This relates to the Council's function as landlord of its homes. The undertaking sets out the corporate level root causes of non-compliance and

the programme of improvements required to restore full compliance, supporting whole Council ownership and alignment with the Corporate Plan. Approval will enable the Council to demonstrate accountability, transparency, and a firm commitment to improving services for tenants.

Commissioner Review

This Voluntary Undertaking is a major step in the Council showing grip, accountability, and commitment to improving their landlord services for the benefit of tenants and leaseholders. The criticality of delivering the tasks involved cannot be underestimated nor can the importance of collective corporate buy in to this endeavour. Commissioners will be paying close attention to the ongoing and significant improvements that are needed across housing services.

2. Report

Introductory paragraph

2.1 The Regulator of Social Housing (RSH) sets regulatory standards for social landlords in accordance with powers under the Housing and Regeneration Act 2008. As the Council owns and manages homes it is regulated by the RSH. In June 2025, following an inspection, RSH issued the Council with a regulatory judgement of C3 against the consumer standards. This identified serious failings in how the Council delivered the outcomes of the consumer standards and identified that significant improvement was required, specifically in relation to outcomes in Transparency, Influence and Accountability Standard and Tenancy Standard. Some improvements were also needed in relation to elements of the Safety and Quality Standard and the Neighbourhood and Community Standard.

2.2 Where a landlord takes responsibility for improving, RSH will normally work with the landlord until it has given evidence which gives assurance that it has addressed the relevant failures. Entering into the Voluntary Undertaking will directly demonstrate to the RSH and the Council's tenants that it has in place remedial strategies and is committed to resolving the issues and their underlying causes. The undertaking aligns with and strengthens the Corporate Recovery Plan by tackling the root causes of non-compliance—financial instability, weakened governance, workforce gaps, and IT and data deficiencies—which have affected service delivery across the organisation. Approving the undertaking reinforces the Council's corporate priorities of rebuilding organisational stability, improving compliance and assurance, enhancing resident involvement, and ensuring that housing services operate with the quality, transparency and accountability expected of a Best Value authority.

Options considered

Two options have been considered: entering into the Voluntary Undertaking with the Regulator of Social Housing, which is the recommended option because it provides a clear framework for addressing the Council's non-compliance with the consumer standards and strengthening corporate accountability; or not entering into the undertaking, which would carry significant regulatory and governance risks.

Option 1 – Recommended

Entering into the Voluntary Undertaking provides a clear and credible route to addressing the findings of the Regulator of Social Housing's June 2025 C3 regulatory judgement, which identified serious failures across the Transparency, Influence and Accountability Standard and the Tenancy Standard, with weaknesses in Safety and Quality and Neighbourhood and Community Standards. The Voluntary Undertaking offers significant benefits: it demonstrates transparent acknowledgement of the regulator's findings; it sets out how the Council will address the corporate level root causes of noncompliance, including financial instability, governance disruption, data and IT deficiencies, and workforce gaps; and it aligns improvement activity with the Council's Corporate Recovery Plan. Entering the undertaking signals the Council's commitment to restoring compliance, improving tenant outcomes, and strengthening governance and assurance.

Option 2 – Not recommended

Although the giving of an undertaking is voluntary, the Regulator of Social Housing's enforcement guidance makes clear that it is unlikely to use its enforcement powers where a landlord is prepared to address the problems, tackle their underlying causes, and can demonstrate the capacity, capability and resources to do so. Choosing not to enter into the Voluntary Undertaking would therefore present a significant risk. It could indicate to the Regulator that the Council does not fully accept the seriousness of the C3 judgement or the need for whole-Council ownership of the improvement programme. Given the scale of the failings identified and the Council's wider governance context, this could undermine regulatory confidence and increase the likelihood of further enforcement action or closer monitoring.

Background

The RSH sets statutory consumer standards that all registered providers must meet to ensure tenants live in safe, high-quality homes, receive fair and transparent services, and have meaningful opportunities to influence decisions. These include the Transparency, Influence and Accountability Standard, the Tenancy Standard, the Safety and Quality Standard, and the Neighbourhood and Community Standard.

In June 2025, the RSH conducted a regulatory inspection of the Council's housing services and issued a C3 regulatory judgement. The Regulator found serious failings in relation to the Transparency, Influence and Accountability Standard and the Tenancy Standard, alongside weaknesses in the Safety and Quality and Neighbourhood and Community Standards. The judgement acknowledged that the Council understood the issues and had begun developing an improvement plan.

The Council has already commenced work in addressing the issues raised in the judgement, however entering into a Voluntary Undertaking provides an additional commitment. Such an undertaking is given in accordance with s.215 of the Housing and Regeneration Act 2008. RSH must have regard to any voluntary undertaking offered or given by a landlord. In considering whether to accept such an undertaking, RSH will assess whether the terms are satisfactory, consider past conduct such as how the landlord has addressed past issues raised by RSH and consider the seriousness and urgency of

the matter. Where a voluntary undertaking is accepted by RSH, it will monitor progress and is not satisfied with progress, it can consider exercising its enforcement powers.

RSH has an expectation that landlords will work with it to support successful deployment of powers. This includes keeping RSH up to date on progress.

The voluntary undertaking provides a detailed analysis of the root causes of non-compliance, confirming that these arose from significant corporate level issues rather than shortcomings within the Housing Directorate alone. These includes a poorly executed restructure, loss of technical expertise, deficiencies in IT systems and data management, and weakened governance and assurance arrangements.

The Voluntary Undertaking also sets out the comprehensive programme of projects and improvement actions required to restore compliance with each consumer standard. This includes strengthening governance, improving tenant engagement, modernising allocations, embedding compliance programmes, procuring an asset management system, improving data quality, and aligning housing improvements with the wider Corporate Recovery Plan

3. Implications of the Recommendation

3.1 Financial implications

3.1.1 The report proposes that Cabinet approves a Voluntary Undertaking with the Regulator of Social Housing to enable the council demonstrate accountability, transparency, and a firm commitment to improving services for council tenants. The costs of the service improvement projects reflected within the undertaking have already been incorporated into the approved HRA Revenue budgets 2026/27 and provision has been made within the 5-year HRA Revenue budgets for future financial requirements. Any additional budget requirements arising from this work will be reflected in the next annual refresh of the HRA 30-year Business Plan.

3.2 Legal implications

3.2.1 The RSH has powers under the Housing and Regeneration Act 2008. Its functions include setting and enforcing standards for social landlords, including local authorities, conducting inspections, and monitoring performance and working with social landlords to improve standards and governance to protect tenants.

3.3 Risk management implications

3.3.1 The principal risk relates to the Council failing to deliver the commitments set out in the Voluntary Undertaking. Non-delivery would undermine the Council's ability to address the areas of non-compliance identified in the Regulator of Social Housing's June 2025 C3 judgement, which highlighted serious failings across the Transparency, Influence and Accountability Standard and the Tenancy Standard, and weaknesses in the Safety and Quality and Neighbourhood and Community Standards. Failure to deliver could further erode regulatory confidence and increase the likelihood of additional scrutiny or intervention.

This risk is mitigated through collective ownership across the organisation, recognising that the root causes of non-compliance stem from corporatewide

issues, including financial instability, governance disruption, data and IT deficiencies, and workforce gaps. will be supported through strengthened governance structures, including the Housing Improvement and Transformation Board, and Best Value Board, all of which provide enhanced oversight, assurance Together, these mechanisms ensure that progress is monitored, risks are escalated, and the organisation remains collectively accountable for achieving full compliance.

3.4 *Environmental implications*

3.4.1 The decision to enter into the Voluntary Undertaking has no direct environmental implications. The Regulator of Social Housing's consumer standards focus on safety, quality of homes, tenancy management, resident influence, and neighbourhood conditions, but they do not include explicit environmental or sustainability requirements. As such, the Voluntary Undertaking does not create new environmental obligations for the Council, and the improvement actions outlined within it relate to governance, compliance, data quality, and service delivery rather than environmental performance. Any future environmental impacts arising from wider housing investment or asset management activity will be considered through the Council's usual decision-making and approval processes.

3.5 *Equality implications*

3.5.1 The decision to enter into the Voluntary Undertaking has positive equality implications, as it directly supports the Council in addressing the failings identified by the Regulator of Social Housing's June 2025 C3 judgement, including weaknesses in how services were delivered to tenants and households with diverse needs. The Voluntary Undertaking strengthens the Council's commitment to fair and equitable service provision by improving tenant engagement, ensuring transparency, and enhancing the responsiveness of housing services to residents' individual circumstances.

Although the RSH consumer standards do not explicitly reference the Public Sector Equality Duty, they require landlords to deliver transparent, accountable, safe, and high-quality services for all tenants, including those who may be vulnerable or have protected characteristics. By addressing the root causes of non-compliance—such as gaps in data, loss of expertise, and weaknesses in governance and service delivery—the undertaking will help ensure that services are better able to identify, understand and respond to the needs of all residents, including those who may be disproportionately affected by poor housing conditions.

A detailed Equality Impact Assessment will be conducted as part of the implementation of individual workstreams within the improvement programme, ensuring that impacts on tenants with protected characteristics are assessed, understood, and mitigated as required.

4. **Background Papers**

None