

Voluntary Undertaking

April 2026

Introduction

Slough Borough Council acknowledges the Regulator of Social Housing's inspection and subsequent judgement (**Slough Borough Council (00MD) - Regulatory Judgement: 25 June 2025 - GOV.UK.**)

The council accepts the findings and commits to delivering the improvements required to achieve full compliance with the consumer standards. Over the past seven years, Slough has faced significant challenges, including the issuing of a Section 114 notice in July 2021 by the council's chief finance officer, government intervention, severe financial constraints, and disruption from previous transformation activity.

Government-appointed commissioners remain in Slough, reflecting the scale of recovery required. The financial challenge is significant, with a Medium-Term Financial Strategy requiring savings of approximately £28 million over three years and capital headroom constraints of around £20 million impacting investment in service delivery, including IT systems.

Despite these pressures, there is a clear and shared commitment - from members, the corporate leadership team (CLT), and the housing directorate - to deliver the improvements necessary to make housing services compliant and sustainable.

Voice of tenants and residents

The council recognises that the poor experience of tenants and leaseholders has been a significant factor in the Regulator's judgement and must directly inform both the direction and pace of improvement.

Feedback from residents, through complaints, Member enquiries, estate inspections, and Tenant Satisfaction Measure outcomes, has consistently highlighted issues about the quality and timeliness of repairs, the handling of damp and mould, communication failures, and the difficulty residents have had in influencing how services are delivered.

The council accepts this is not acceptable. Strengthening the voice of tenants is therefore central to this voluntary undertaking and to achieving full compliance with the Transparency, Influence and Accountability (TIA) Standard. The Resident Involvement Strategy and action plan, the revitalised Residents' Board and new Tenant and Resident Panel, and the commitment to publish clear performance information are designed to ensure that residents can meaningfully influence decisions, scrutinise progress, and see tangible improvements in the services they rely on.

Summary of regulatory judgement

In June 2025, the regulator issued a C3 non-compliant grade, citing serious failings in relation to the transparency, influence and accountability standard and the tenancy standard, with weaknesses in the safety and quality and neighbourhood and community standards. The regulator acknowledged that Slough Borough Council understands the issues and had begun implementing a comprehensive improvement plan.

Purpose and overview of this document

This voluntary undertaking sets out the council's explanation of the root causes of non-compliance within the housing service, identifying how these issues have arisen from corporate-wide challenges experienced since 2020. It provides an overview of the corporate recovery plan and describes how improvements within the housing service are aligned with, and dependent upon, the wider organisational recovery programme.

The document details the key improvement actions required to achieve compliance with each of the Regulator of Social Housing's consumer standards. It concludes by outlining the governance, monitoring and assurance arrangements that will oversee the delivery of this voluntary undertaking and ensure sustained compliance.

Root cause analysis

The council has undertaken a structured review to understand why compliance failed and to identify learnings that will underpin sustainable change. Root causes are interlinked and reflect historic corporate conditions as well as service-specific gaps.

Corporate financial crisis and Section 114 notice (July 2021): The Section 114 notice diverted corporate focus to immediate financial stabilisation, constrained investment, and created significant pressure on enabling services to the housing department (finance, procurement, data and digital). This reduced organisational bandwidth and contributed to delays in modernising landlord services, impairing compliance oversight, and delivery.

Transformation disruption (2020–21): Earlier transformation activity removed or weakened governance structures and fragmented teams. High turnover and interim staffing reduced continuity, institutional memory, and programme management discipline - particularly across health and safety compliance, allocations, and policy refreshes in housing.

Loss of technical expertise and reliance on temporary staff: Critical roles in compliance, asset management, allocations, and data were vacant or filled on an interim basis. This created inconsistent standards, reduced assurance capability, and slowed policy and procedure updates.

IT system deficiencies and poor data management: Multiple legacy systems and manual processes (e.g. allocations, asset/compliance records) hindered a single view of assets and residents, impeded evidence-based decision making, and weakened performance management.

Weak resident engagement: Tenant involvement and influence are significantly under developed. For a sustained period, the Resident Board operated as the only formal mechanism for tenant engagement, limiting opportunities for residents to shape services, scrutinise performance, or provide meaningful feedback. This constrained the council's ability to understand tenant experience, respond to concerns, and meet the expectations of the Transparency, Influence and Accountability Standard. The lack of structured, diverse and accessible engagement routes meant that tenant voice did not systematically inform service design, policy reviews or improvement activity.

Pandemic impact: COVID-nineteen exacerbated operational instability, delayed inspections and compliance programmes, and reduced opportunities for meaningful tenant engagement and scrutiny.

Strategic isolation of housing within corporate context: Housing services operated without sufficient corporate alignment and assurance for a period, limiting escalation pathways, cross-council support, and coherent risk management.

Resourcing constraints have materially impacted compliance and improvement capacity. At the corporate level, diagnostic data identified 37% of roles and 45% of leadership posts as interim or vacant at the review point (recovery and transformation plan presented to cabinet 17 November 2025), reflecting structural instability and a reliance on temporary cover. Slough is under government intervention with commissioners in place, providing statutory oversight on best value, financial sustainability, and governance.

Root cause numbers

Section 114 notice issued July 2021, triggering statutory intervention and commissioner oversight.

Workforce diagnostic identified 37% of roles and 45% of leadership posts as interim or vacant at review point.

Medium-Term Financial Strategy sets a savings requirement of approximately £28 million over three years.

Capital headroom constraints of around £20 million impact investment in services, including IT systems.

These figures reflect the position identified through the corporate workforce and organisational review conducted in late 2025, with findings reported to Cabinet on 17 November 2025.

Corporate recovery plan alignment

The corporate recovery plan sets out how the council will stabilise governance, finance, workforce, and technology. This section explains how those corporate actions support housing's improvement plan and why they matter for delivering compliance and sustainable change.

- **Governance and leadership:** The Transformation Board (CLT-led), Best Value Board (commissioner-led), and a formal design authority to strengthen assurance, stage-gate control and decision-making for changes affecting housing.
- **Financial stability:** The Medium-Term Financial Strategy and transformation savings profile provide a route to financial stability and sustain investment in compliance, data, and modern systems (March 2026).
- **Digital and data:** We are creating a clear technology blueprint and working closely with service teams so that digital tools, accurate data, and useful analysis become part of everyday housing services.
- **Workforce and culture:** The workforce strategy reduces reliance on interim roles and clarifies performance expectations; programme and project disciplines are maintained through the central Project Management Office (PMO) and design authority.
- **Risk and compliance:** Corporate risk maturity and audit are integrated with housing compliance dashboards and external assurance to strengthen the three lines of assurance.

Internal Audit: integral to service recovery

Internal audit is a principal component of the council's recovery and assurance framework and is critical to achieving sustainable compliance with the Regulator of Social Housing's consumer standards. As part of the corporate strengthening of governance, internal audit provides independent, systematic oversight of the highest risk areas within landlord services, validating whether controls are effective, processes are safe, and statutory duties are being met.

The Internal Audit Programme for Landlord Services (2026–2029) has been aligned with the C3 regulatory judgement, the Voluntary Undertaking, Awaab's Law, and the key milestones within the Housing Improvement Plan. The programme provides structured assurance across all consumer standards.

The audits focus on areas where the regulator identified serious failings, ensuring early confirmation of progress, risk reduction, and improvement in compliance.

Across the three year programme, internal audit will test and verify:

- the council's approach to damp, mould and Awaab's Law, including timescales, end to end case handling, and data accuracy
- allocations and the new Choice Based Lettings system, ensuring the process is fair, transparent and compliant with the Tenancy Standard
- landlord health and safety compliance, including evidence trails, data integrity and the accuracy of compliance dashboards
- complaints handling, tenant communications and statutory Tenant Satisfaction Measures, with a focus on accessibility, timeliness and lessons learned processes
- stock condition data assurance and asset management, confirming the robustness of the evidence base used for investment and planning
- repairs, voids and the lettable standard, including right first time performance and links to wider compliance duties
- governance and readiness for the new maintenance contract, ensuring robust specification, resident involvement, quality controls and adherence to key date requirements
- tenancy sustainment, income collection and service charges, including fairness, transparency and the identification of vulnerability
- resident influence and scrutiny arrangements, providing assurance that tenant views are shaping decisions in line with the Transparency, Influence and Accountability Standard
- neighbourhood management and anti social behaviour, assessing casework, estate management and partnership working.

The programme ensures that each major area of regulatory concern is independently assessed, with findings feeding directly into the Housing Improvement and Transformation Board and the Health and Safety Board. This structured approach provides clear and ongoing assurance to the regulator, tenants, members and commissioners that improvements are being delivered, verified and sustained.

Improvement framework

Drivers of Improvement and Corresponding Housing Actions

| Identified Issues | Housing action | Corporate support |
|--------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|
| Governance gaps post-transformation | Establish new Housing Improvement and Transformation Board; enhance the role of the Residents' Board in governance and scrutiny, clarify roles in the housing governance process; project management discipline through the PMO; monthly compliance (health and safety) reporting. | Transformation Board; Design Authority; central PMO. |
| Outdated policies and lack of standards | Refresh tenancy policy; allocations policy; service standards; complaints and customer care standards. Meet the new Competency and Conduct Standard. | Legal Services, Democratic Services and Learning and Development team. |
| IT/data deficiencies | Procure asset management database; implement Choice-Based Lettings; data cleanse and single source of truth for compliance. | Digital and data target architecture; business partnering; Enterprise resource planning upgrades (single source of the truth). |
| High staff turnover and loss of expertise | Recruit permanent people; development policy for our people; department restructure. | Workforce Strategy; HR business partnering; culture and performance. |
| Weak resident engagement | Resident Involvement Strategy and Plan; Revitalised Residents' Board, Residents' Panel; Tenant Satisfaction Measures outcome improvements. | Corporate engagement and communications strategy; Customer Service improvements. |
| Financial constraints | Prioritised HRA capital investment plan; risk-based compliance (health and safety) programmes. | MTFS savings, commissioning, and procurement controls. |
| Lack of risk management | Compliance dashboards; internal audit programme; external reviews - overseen by the Housing Improvement and Transformation Board and the Residents' Board. | Risk Maturity programme; audit; Best Value Board oversight. |

Headline improvements by consumer standard

This section sets out the key improvements the housing department will deliver under each consumer standard. These actions are designed to address root causes, improve compliance, and enhance services for tenants and leaseholders.

Transparency, influence and accountability standard

- We will publish a strengthened Resident Involvement Strategy annual plan that explains how tenants will influence decisions and monitor progress and meet other objectives in the strategy.
- We will establish a resident panel and co-design groups so residents can shape service changes and hold us to account.
- We will strengthen the complaints process by making it easier to access, setting clear resolution standards, and publishing reports on lessons learned.
- We will publish a short KPI scorecard every quarter showing measures residents care about, such as first-time resolution, repairs timeliness, and complaint response times.

Enhancing tenant data and insight

To strengthen transparency, accountability and responsiveness to tenants, the council recognises that it must significantly improve how it gathers, maintains and uses information about residents. High quality tenant data is essential to meeting the Transparency, Influence and Accountability Standard and to delivering services that reflect residents' needs, vulnerabilities, and preferences.

Over the next three years, the council will adopt a structured programme of activity to improve the completeness, accuracy and value of tenant data. This includes the below.

- **Completing comprehensive tenancy audits** of all tenanted homes to verify household information, protected characteristics, vulnerabilities, communication needs, support requirements, and risk indicators, ensuring services are tailored and responsive.

- **Establishing a single, authoritative source of tenant and household data**, supported by strengthened data governance, standardised data definitions and improved validation processes.
- **Embedding a 'know your residents' approach**, ensuring frontline staff routinely update household information through repairs visits, neighbourhood inspections, housing management contact and customer interactions.
- **Improving digital capture of information**, including secure uploads of supporting evidence, standardised forms, and automated updates into core systems where possible.
- **Creating resident profiles** that enable staff to understand key needs at the point of contact, for example, language requirements, health vulnerabilities, preferred communication methods, and known risks.
- **Using good practice from the sector**, such as adopting rolling tenancy audits, vulnerability flags, cross service data sharing and structured annual reviews of priority tenant groups to ensure information remains current.
- **Linking tenant insight to service design and performance monitoring**, ensuring resident data informs decision making about repairs, investment, neighbourhood priorities, tenancy sustainment and communication approaches.

These actions will ensure that the council has a reliable, up to date understanding of tenants and households, enabling services to be more proactive, personalised and compliant with regulatory expectations. Stronger tenant insight will also support the council's wider commitment to rebuild trust and ensure the residents' voice is central to service improvement.

Tenancy standard

- We will rewrite the Allocations Policy and implement a Choice-Based Lettings system to make the process fair, transparent, and easy to use.
- We will reduce void turnaround times by introducing a clear lettable standard and improving process assurance.
- We will improve tenancy sustainment by offering early intervention, budget support, and working with voluntary and community sector partners to provide additional help.

Safety and quality standard

- We will deliver risk-based compliance programmes for gas, fire, asbestos, water, lifts, and electrical safety to achieve targets agreed with the Residents' Board and elected members.
- We will complete a stock condition survey of our homes and communal areas and establish an asset management database to support long-term planning.
- We will implement clear standards for responding to damp and mould and publish performance reports.

Neighbourhood and community standard

- We will conduct regular estate inspections and agree neighbourhood improvements with residents.
- We will strengthen anti-social behaviour partnership working and improve case management.
- We will improve cleanliness and environmental maintenance through stronger contract management and performance standards.

Data management (cross-cutting)

- We will create a sole source of truth for key housing datasets, including assets, compliance, and allocations.
- We will introduce compliance dashboards and embed data owners, and quality controls.
- We will align our approach with the council's technology blueprint and Design Authority standards.

Key improvement commitments

The commitments set out in this section represent the council's longer term improvement activity and are derived from the wider Improvement Framework and the headline improvements required to secure full and sustainable compliance with the consumer standards. These actions sit beyond the scope of the current short term Service Improvement Plan but will be incorporated

into future iterations as part of the planned review cycle. This approach ensures that immediate regulatory priorities are addressed at pace, while also maintaining a clear forward plan for the medium to long term changes necessary to embed cultural improvement, strengthen governance and deliver a compliant and resilient housing service.

Key improvement commitments to be delivered over three years, sorted by completion date

| Project number | Commitment | Start date for project | Completion date for project |
|----------------|---------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|-----------------------------|
| 1. | Produce a Housing Strategy 2026-2031 | August 2025 | June 2026 |
| 2. | Approval and implementation of the restructure of Housing Services (2 phases) Phase 1 | January 2026 | April 2026 |
| 3. | Procure and implement a choice-based letting system | August 2025 | July 2026 |
| 4. | Produce and implement a new Allocations Policy | December 2025 | July 2026 |
| 5. | Live compliance performance dashboard including the monitoring of damp and mould | September 2025 | September 2026 |
| 6. | Approval and implementation of the Restructure of Housing Services (2 phases) Phase 2 | May 2026 | September 2026 |
| 7. | Produce a Tenancy Management Policy - ensuring the effective management of our homes | April 2026 | October 2026 |
| 8. | Create a Tenant Voice Framework with structured engagement routes (tenant board, digital panels and neighbourhood events) | November 2025 | November 2026 |
| 9. | Procure and complete stock condition survey programme of homes | April 2025 (Surveys to start in March 2026) | December 2026 |
| 10. | Publish a comprehensive Resident Involvement Strategy 2027-2032 (renewal of current Strategy) | March 2026 | March 2027 |
| 11. | Undertake tenancy audits of our all-tenanted homes | September 2025 | March 2027 |

| Project number | Commitment | Start date for project | Completion date for project |
|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------------|
| 12. | <p>NEC Housing System Implementation - Controlled Reset and Recovery Programme</p> <p>Implement a controlled reset of the NEC Housing system deployment to stabilise the programme, recover critical functionality, and realign delivery with SBC's strategic objectives</p> | December 2025 | March 2027 |
| 13. | Undertake a full review of existing tenant data identifying gaps, inconsistencies and areas where information requires updating or standardisation | April 2027 | September 2027 |
| 14. | Complete new Asset Management Strategy | December 2026 | September 2027 |
| 15. | Produce a Data Quality and Assurance Strategy with the objective of strengthening processes for collecting and updating tenant data (rolling tenancy audits/data from other departments and sources) | September 2027 | March 2028 |
| 16. | Re-procure and mobilise new maintenance contract | April 2026 | April 2028 |
| 17. | Review and update all housing and property management policies | December 2025 | December 2028 |
| 18. | Implementation of the Competency and Conduct Standard | February 2026 | October 2029 |

Governance, monitoring and assurance of the voluntary undertaking

Progress against the voluntary undertaking will be overseen through strengthened governance and assurance arrangements that draw on the full range of corporate support available to the housing service. Housing performance, compliance and improvement activity will be monitored through the Housing Improvement and Transformation Board and the Corporate Health and Safety Board, both chaired by the Executive Director of Housing, ensuring clear accountability and structured oversight of delivery.

Corporate mechanisms such as the Transformation Board and the Design Authority are available to provide additional scrutiny and assurance where required. These bodies will be utilised as appropriate to support delivery of the voluntary undertaking - reviewing progress, assessing benefits, and providing independent sign off for changes to systems, procurement activity and estates proposals at key milestones. This ensures that the housing service can draw on wider organisational expertise and controls whenever necessary to maintain compliance and manage risk.

Independent assurance will continue to be strengthened through internal audit and specialist external reviews, which will test the effectiveness of controls, validate data quality and identify areas requiring further improvement. Reports from these activities will be escalated if required through the Best Value Board, Cabinet and the Regulator of Social Housing, providing transparent evidence of progress and the actions being taken to address any shortcomings.

Tenants will play a central role in monitoring delivery through the Residents' Board and the Tenant and Leaseholder Panel, supported by published performance dashboards and KPI scorecards. This ensures that resident insight and challenge remains firmly embedded in the assurance framework and aligned with the transparency, accountability and influence expectations of the consumer standards.

Programme Management Office (PMO)

The Programme Management Office (PMO) acts as the central hub for managing change across the council. It ties housing's improvement work into corporate oversight by operating a stage-gate process that ensures every initiative is properly scoped, approved, and delivered. The PMO sets standards, provides templates for business cases and delivery plans, tracks interdependencies, and reports progress to the Transformation Board and Best Value Board. This approach matters because it gives the Regulator confidence that improvements are governed, resourced, and evidenced through a transparent assurance framework.

External audits and reviews

External audits and independent reviews provide objective assurance that the council is addressing compliance risks and improving services effectively and delivery of the voluntary undertaking. These reviews evaluate governance, data integrity, operational delivery, and readiness for future changes. Summarised below are the key findings from recent audits and system reviews.

External assurance: headline findings

Compliance health check (Pennington Choices, March 2025): Limited assurance overall; governance and strategic oversight require strengthening; internal audit absent across the six compliance areas; 2,262 overdue fire risk actions; recommendations include establishing quality assurance (internal/third-party audits), data validation, and enhanced reporting.

Damp and mould health check (Pennington Choices, March 2025): Limited assurance; current approach reactive; 764 active damp and mould cases awaiting remedial works; absence of an asset management system; twenty-two recommendations including initiative-taking strategy, leadership reporting, training, and meeting Awaab's Law timescales.

NEC Housing System Review (QLP, Oct 2025): Independent review to capture lessons learned and provide assurance on readiness for additional modules and enhancements - scope includes temporary accommodation, private sector leasing, allocations and choice-based lettings, audits and inspections, income collection/resolution of historic issues, asset management, customer portal, and housing/finance interface.

Key corporate strategies underpinning the voluntary undertaking

The voluntary undertaking is supported by two key corporate strategies, summarised below, which collectively strengthen the council's ability to meet the Regulator of Social Housing's Safety and Quality and Transparency, Influence and Accountability (TIA) Standards. The Corporate Workforce Strategy ensures the capacity and capability needed to deliver safe, high-quality housing services, while the Customer Strategy provides the framework for responsive, tenant-focused service delivery. Together, these strategies form the organisational foundations that underpin the commitments set out in this undertaking.

Corporate Workforce Strategy (summary)

Slough's Workforce Strategy focuses on four priorities: Getting the basics right; building trust and empowering people; fostering a healthy and inclusive environment; and creating a positive, transformative culture. Actions underway include annual performance reviews linked to talent pathways, strengthened career progression communications, learning and development with protected time, and targeted reduction of interim reliance. Diagnostic findings highlight resourcing challenges: 37% of roles and 45% of leadership posts were interim or vacancies at the point of review, driving instability and a need for strategic workforce planning. For housing, this strategy underpins recruitment and retention of permanent specialists in compliance, asset management, allocations, and data management.

Customer Strategy (summary)

Customer focus is embedded in the Recovery and Transformation Plan mentioned above through values-driven service design and a digital/data strategy. Key elements include resident engagement and co-design (Resident Board and Tenant and Leaseholder Panel), a commitment to clear communication and transparency, and a target architecture enabling a single view of the resident and user-centred, joined-up services. Operationally, housing will publish a short public KPI scorecard (TSMs and service metrics) quarterly; strengthen complaint handling and lessons-learned; and use data to personalise contact and support.

Conclusion

Slough Borough Council recognises the seriousness of the regulator's judgement and the historic failings that led to it. There is unwavering commitment across members, senior leadership, and the housing team to deliver the improvements required. Through the combined efforts of the Corporate Recovery Plan and the Housing Services Improvement Plan, the housing directorate will restore compliance, rebuild trust with tenants, and ensure services meet the consumer standards in full.

Apology to tenants and residents

We acknowledge the standards of service provided have fallen short of expectations and regulatory requirements. We apologise for these failings and the impact they have had on you. We are committed to learning from these shortcomings and ensuring that your needs are at the heart of everything we do. Through the actions set out in this undertaking, we will work tirelessly to restore trust, improve services, and deliver the quality and accountability you deserve.

Voluntary Undertaking