

Competence and Conduct Policy for Social Housing Roles



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South & East Lincolnshire Councils Partnership

For Employees Working in Social Housing Roles within South Holland, Boston and East Lindsey

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- Senior Leadership Team
- SHDC Tenant Influence Panel
- Staff
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1. Purpose

This policy sets out the Council's approach to ensuring that all relevant Employees (as defined in section 2) who deliver or influence the delivery of landlord services are suitably skilled, knowledgeable, experienced and exhibit the right behaviours, and that these standards are consistently maintained, evidenced, and improved. It also sets out how we ensure the same standards are applied by service providers acting on our behalf.

This policy fulfils the requirements of the Competence and Conduct Standard and is aligned with the Government's Policy Statement on Qualifications Requirements for Social Housing. This policy provides additional guidance and should be read alongside, and not as a replacement for the Officer code of Conduct and other relevant Council policies and procedures as detailed in section 14.

2. Definitions

- **Relevant Employees:** Employees and engaged workers whose roles deliver or materially influence the quality, safety, compliance, or tenant experience of landlord services.
- **Service providers:** Any third-party engaged to deliver services or functions related to landlord services.
- **Competence:** The combination of skills, knowledge, experience, and behaviours necessary to perform role requirements safely, ethically, and to a high standard.
- **Landlord services:** Services delivered to tenants and leaseholders in relation to the occupation, management, maintenance, safety, and improvement of homes and neighbourhoods.

3. Scope

This policy applies to:

- All relevant employees employed by the Council involved in the provision, oversight, or assurance of landlord services (Each council defines relevant employees based on its own structure. Only roles that directly deliver or influence landlord functions are included). The definition and identification of relevant employees is overseen and approved by the Assistant Director responsible for landlord services.
- Agency workers, interim Employees and apprentices, in relevant roles.
- Service providers (contractors, consultants, arms-length bodies, and partners) delivering landlord services or functions that impact service quality or resident safety on the Council's behalf.

4. Regulatory and Policy Framework

The Council will meet all applicable requirements of the Government's Policy Statement on Qualifications Requirements for Social Housing, and the Regulator's Competence and Conduct Standard. Where national requirements are updated, this policy and associated arrangements will be reviewed promptly and updated.

The following legal and regulatory references are relevant to the Competence and Conduct Policy:

- Housing and Regeneration Act 2008 - Gives legal authority for standards-setting and defines terms
- Competence & Conduct Standard Policy Statement - Sets background, qualifications, and conduct requirements
- Policy Statement on Qualification Requirements (2025) - Defines qualification expectations for senior roles
- Competence & Conduct Standard Policy Statement - Sets background, qualifications, and conduct requirements
- Professionalisation Guidance (CIH) - Describes required skills, behaviours, and evidence expectations

In line with the Public Sector Equality Duty under the Equality Act 2010, the Council has undertaken an Equality Impact Assessment (EIA) for this policy. The assessment considers the potential impact on tenants, colleagues and service users with protected characteristics and other vulnerabilities, and identifies mitigations to ensure fairness, accessibility and compliance with equality duties.

5. Roles and Responsibilities

Roles and responsibilities set out in this section are further defined and supported by the SELCP Learning and Development Policy.

5.1 Manager

- Ensure staff are competent, trained, and supported to meet role requirements.
- Monitor performance, record keeping and case progression.
- Hold regular one-to-ones and annual reviews in line with policy and guidance and using standard templates.
- Manage induction, probation, and poor performance in line with Improving performance policy and corporate frameworks.
- Promote safe, professional and tenant focused practice.

5.2 Employees

- Maintain the skills, knowledge, behaviours, and qualifications required for their role.
- Complete mandatory training and keep accurate case records.
- Follow the communication, conduct and safeguarding standards in this policy and the Code of Conduct.
- Engage in supervision, reviews and Continuous Professional Development (CPD).

5.3 HR and Organisational Development

- Maintain the policy and support managers with performance, conduct and development processes.
- Coordinate mandatory training and maintain qualification records.
- Ensure alignment with regulatory and employment requirements.

6. Our Approach to Managing and Developing Competence

6.1 Principles

- Competence will be tailored to each role (e.g., housing officers, repairs operatives, compliance officers, surveyors, managers).

- We will manage competence from recruitment through probation, induction, ongoing development, and career progression.
- Higher-risk roles (e.g., building safety/compliance) will have enhanced competence requirements and formal qualifications.
- Competence will be assessed and evidenced through qualifications, Continuous Professional Development (CPD) logs, observed practice, test/checks, 121 and Annual Review notes, and tenant outcomes.
- We will embed conduct expectations, including Integrity, Inclusive, Ethical, Knowledgeable, Skilled, Advocate, Leadership.

6.2 Role Understanding

- The service understands the relevant roles and the skills, knowledge, behaviours, and experience required to perform them effectively. It also identifies which roles require mandatory qualifications or certifications, along with any refresher or re-accreditation requirements and supervision or observation needs.

6.3 Induction and Probation

- All relevant Employees will complete a structured induction including:
 - Overview of regulatory standards, Council policies, relevant safeguarding and health and safety training dependent on role, equality diversity and inclusion, data protection and GDPR, complaints handling, whistleblowing, domestic abuse, Awaab's Law and code of conduct.
- Probation will include a competence review; unsuccessful probation outcomes will trigger a support and remediation plan or termination in line with the Councils [Probation Policy](#)

7. Communication Standards

7.1 Responsiveness

- All tenant contact must be acknowledged. Employees should provide a full response and, where appropriate, confirm a clear timeframe for resolution. Wherever possible, responses should use the tenant's stated communication preference.
- Enquiries will be acknowledged within five working days, unless a different timeframe is set out in the relevant policy (for example, ASB enquiries will receive a response within two working days and the complaints policy has specific response timescales).

7.2 Clarity and Accuracy

- Information given to tenants must be clear, accurate, and consistent.
- Employees will record the tenant's preferred communication method (phone call, email, letter) and endeavour to use this for updates where possible
- Employees must explain reasons for decisions, delays, and next steps using plain English or using translation or interpretation where required or requested. Explanation must include the rights to appeal and/or complaint where applicable.

7.3 Proactive Updates

- For repairs, ASB reports, complaints, and casework, Employees must provide updates at key milestones and where circumstances change.
- Employees must "close the loop" by confirming when issues are resolved and checking if tenants are satisfied with the outcome.
- If an appointment cannot be kept, the tenant must be informed as soon as possible the same day, with a new appointment offered as soon as practicably possible.

7.4 Listening and Acting on Feedback

- Employees must demonstrate active listening, acknowledge concerns, and ensure these are logged with Tenant Engagement and Experience Team where applicable and acted upon.
- Employees must inform their Service Manager and/or the Tenant Engagement and Experience Team of all relevant tenant feedback. This feedback will be used to identify themes, inform service improvements, and be shared with tenants through Your Voice, We Heard.
- Employees must inform tenants how to report a compliment, complaint and/or contact the Housing Ombudsman. Employees must record any dissatisfaction with the Housing Complaints Coordinator to investigate and any compliment with the Tenant Engagement and Experience Team to log.

7.5 Inclusive Communication

- Employees must consider tenants' individual communication needs and make reasonable adjustments (translation, easy read, email preference, advocacy involvement, accessible formats, etc.).

7.6 Case Ownership until Completion

- The first officer handling the issue retains responsibility until the matter is formally handed over and confirmed as accepted by another team.

7.7 Record Keeping

- Employees must maintain accurate, timely and complete records for all tenant interactions, decisions and actions taken.
- All records must be entered into the appropriate housing management system on the same working day or where this is not possible as soon as practicably possible.

8. Learning & Development (L&D) Approach

8.1 Ensuring Up to Date Competence

- Annual Training Needs Analysis driven by changes in law, regulation, building safety, complaints/ombudsman learning, audit findings, regulatory judgements, tenant feedback, and incident reviews.
- Mandatory refreshers that will be recorded for all staff and reported on (e.g., safeguarding, data protection, health and safety, Awaabs Law, vulnerability, domestic abuse, ASB, complaint handling code, consumer standards).

8.2 Qualifications

- The Council will identify all roles that fall within the scope of the Government's Policy Statement on Qualifications Requirements for Social Housing and maintain a list of qualification required roles.
- In line with the Government's Policy Statement on Qualifications Requirements for Social Housing, the Council will ensure that:
 - Senior Housing Managers (those with a substantive role in managing the direct delivery of housing management services) hold, or are working towards, an Ofqual-regulated Level 4 housing management qualification covering the nationally specified content.
 - Senior Housing Executives (Heads of Service/Directors with strategic responsibility for housing management services) hold, or are working towards, an Ofqual-regulated Level 5 housing management qualification (or equivalent foundation degree) covering the nationally required content.
 - These qualification requirements apply to both Council Employees and, where service providers deliver comprehensive housing management services on the Council's behalf, to their relevant senior managers.
 - It applies the statutory transition period so that Employees in scope are enrolled, working towards, or have completed the required qualifications within the national timeframe.
- Job descriptions for all qualification required roles will clearly state the mandatory qualifications. Candidates will be expected to already hold the required qualification at appointment. Where a suitably qualified candidate is not available, the Council may appoint a candidate who does not yet hold the qualification, provided they can achieve it within the statutory timeframe.
- Employees appointed without the qualification must enrol and begin working towards it within the nationally required timescales, and must complete it before the end of the transition period (2029 for South Holland District Council; 2030 for Boston Borough Council and East Lindsey District Council). The Council will provide protected learning time and appropriate support. Failure to enrol, make sufficient progress, or achieve the qualification within the statutory period will be managed under the Improving Performance Policy, taking account of reasonable adjustments and individual circumstances.
- The Council will maintain a qualification register recording: required qualifications, achievement dates, renewal/expiry dates, and evidence of CPD which will be monitored by line managers.
- Where the national qualification framework changes, the Council will review affected roles and ensure that relevant Employees obtain any new or additional qualifications within the statutory timeframe.
- Managers will monitor qualification progress during supervision and appraisal, and ensure Employees maintain competence through CPD, refresher training, and re-accreditation where required.
- In addition to the mandatory Level 4/5 housing management qualifications outlined above, the Council will ensure that all colleagues delivering Housing services hold or obtain any role-specific statutory or technical qualifications required for safe and

compliant practice (e.g., HHSRS (The Housing Health and Safety Rating System), damp & mould, Anti-Social Behaviour (ASB), safeguarding, tenancy management). These form part of the wider competence requirements for relevant roles and will be monitored through supervision, appraisal and CPD.

8.3 Priority Development Areas

- The Council will ensure that relevant Employees maintain and develop the skills, knowledge and behaviours required for their roles through ongoing CPD, refresher training and supervision. Priority development areas include mandatory training (e.g., safeguarding, health and safety, equality and data protection), technical housing skills, care and communication skills, leadership and management capabilities, and digital competence.

9. Annual Reviews and Managing Poor Performance

9.1 Annual Review Framework

- Annual review with mid-year review and regular one-to-ones.
- Objectives will cover service delivery, tenant experience, compliance/safety, values/behaviours, and personal development/CPD.
- Competence check is a standing item at each review.
- Training and development plans are reviewed as part of regular reviews.

9.2 Managing Poor Performance

- The Council places great importance on maintaining levels of performance at an acceptable standard. Performance will be managed in line with the Councils Improving Performance Policy and Procedure which aims to support employees with any intervention that may assist them to achieve the required expectations of their roles.
- The Council will ensure prompt consistent and fair treatment for all employees and to enable both the individual and the Council to be clear about the expectations of both parties.

10. Service Providers: Ensuring Competence and Conduct

Where applicable the Council will ensure service providers' Employees have the necessary skills, knowledge, experience, and behaviours through:

- **Procurement requirements:**
 - Pre-qualification on competence (accreditations, qualifications, H&S systems, training).
 - Specification clauses requiring role-specific competence, CPD, and conduct aligned to our Code.
 - Information security and data protection compliance.
- **Contract terms:**
 - Reporting on training completion, qualifications, and incident/near-miss learning.

- Sanctions for non-compliance up to termination.
- **Monitoring:**
 - Contractor meetings which will review Tenant feedback and complaints.
 - Adherence to the Councils Contractor Code of Conduct (developed with tenants).

11. Code of Conduct

11.1 Adoption and Content

The Council adopts a single corporate Code of Conduct which applies to all employees, regardless of role, service area or professional discipline. In delivering this Code, Employees are expected to demonstrate and uphold the Council's corporate values: We Trust, We Deliver, We Work Together, We Are Proud, We Care. These values underpin the behaviours, standards and expectations described throughout this Code.

This is set out in the Council's approved SELCP Code of Conduct (March 2024) and forms the baseline behavioural expectations for every member of Employees.

The corporate Code of Conduct typically covers the following core areas of professional behaviour:

- Integrity and honesty – acting impartially, avoiding improper influence, and maintaining the highest ethical standards.
- Accountability and openness – ensuring transparency in decision making and record keeping.
- Conflicts of interest – declaring and managing personal or financial interests appropriately.
- Standards of behaviour at work – including respectful conduct, professional boundaries, and appropriate use of council facilities.
- Compliance with laws, policies and procedures – including confidentiality, data protection, safeguarding, health and safety, and equality duties.
- Gifts, hospitality and fraud/anti-corruption expectations – ensuring probity and public trust.
- Representing the council – maintaining professionalism in all interactions with tenants, residents, partners and stakeholders.

In addition to the corporate Code of Conduct, the Council also adopts a Housing Specific Code of Conduct Appendix. This appendix supplements the corporate Code and provides:

- Detailed behavioural expectations linked to the delivery of landlord services.
- Additional conduct requirements shaped by statutory and regulatory duties (e.g. consumer standards, safety, professionalism, tenant engagement, complaint handling).
- Role specific expectations.
- Expectations regarding interactions with tenants, vulnerable residents and service users.

- Expectations relating to managing information, safety and safeguarding within housing operations.

This appendix ensures that Employees delivering landlord services meet the behaviours, and professional standards required under the Regulator of Social Housing's Competence and Conduct Standard.

The Housing Specific Code of Conduct Appendix is published and accessible to tenants, who were provided with meaningful opportunities to influence and scrutinise its development.

11.2 Embedding

- Mandatory induction and annual reaffirmation.
- Line manager reinforcement through supervision and audits.

12. Keeping the Policy and Code Up to Date & Tenant Accessibility.

- Review: Review annually or in light of any regulatory or legal changes.
- Tenant accessibility:
 - Publish the policy and the code on the Council website and make printed copies available on request.
 - Provide plain language summaries, easy read, audio, and translated versions on request.
 - Ensure Employees can explain the policy to tenants and signpost access routes.
- Tenant influence and scrutiny:
 - Engage tenants through Tenant Forum and focus groups, when developing or revising the policy or code.
 - Publish a You Said/We Did summary of tenant feedback and changes.

This policy references a number of internal Council policies and procedures (e.g. Disciplinary Policy, Improving Performance at Work, Grievance Policy, Probation Policy). These documents are internal HR or corporate policies and are not published for tenants.

The Council will, however, ensure that tenants have access to:

- This Competence and Conduct Policy
- The Housing Specific Code of Conduct Appendix
- Plain language summaries or easy-read versions on request

Where internal policies inform how the Council manages competence or conduct, their key principles will be explained in accessible terms within this policy or during tenant engagement activity, without sharing restricted internal documents.

13. Tenant Involvement in Developing the Policy and Code of Conduct

The Council is committed to ensuring tenants have meaningful opportunities to influence, shape and scrutinise this Competence and Conduct Policy and the Housing Specific Code of Conduct Appendix. Please see separate feedback on the Housing Specific Code of Conduct Appendix.

13.1 Tenant Involvement in Initial Development

Tenants were meaningfully involved in the development of this Competence and Conduct Policy and the Housing Specific Code of Conduct through multiple engagement activities. This included:

- Analysis of the 2025/26 SHDC Tenant Satisfaction Measures (TSMs), which identified specific service, communication and behaviour themes that tenants experience.
- Targeted tenant focus groups examining Employees conduct during repairs and home visits, communication expectations, ASB case handling, and complaint handling behaviours. These focus groups were opportunities for tenants to shape the standards included in the Housing Code of Conduct Appendix, including expectations for entering homes, cleanliness, communication, professionalism and respectful treatment.
- Tenant Influence Panel for the newly formed panel to scrutinise the Policy and Code.

Feedback from these activities directly shaped the communication standards, professional behaviour expectations and tenant facing transparency commitments included within this policy.

13.2 Ongoing Tenant Scrutiny

Tenants will continue to scrutinise the implementation of this policy through tenant panels, focus groups, and regular review discussions with the Housing team.

Any proposed changes to the policy or Code of Conduct will be subject to tenant engagement before adoption.

13.3 Monitoring and Assurance

Compliance with this policy is monitored through management reporting, feedback, complaints analysis as part of the complaints working group, tenant feedback, staff surveys and internal audits.

To support this, information relating to the following will be reviewed:

- KPIs linked to service quality and complaints
- Audit reports
- Learning from complaints
- Tenant satisfaction measures.

14. Related Documents

- SELCP – Disciplinary Policy
- SELCP – Equality Diversity and Inclusion Policy

- SELCP – Grievance Policy
- SELCP – Improving Performance at Work
- SELCP – Code of Conduct including Housing Specific Appendix
- SELCP – Learning and Development Policy
- SELCP – Workforce Development Strategy
- SHDC – Safeguarding Policy
- SHDC – Whistleblowing Policy
- SHDC – Probation Policy
- [Government Policy Statement on Qualifications Requirements for Social Housing \(Ch. 1–6\)](#)
- [Transparency Influence and Accountability Standard](#)
- Competence and Conduct Standard
- Complaints Policy; [Housing Ombudsman Complaint Handling Code](#)
- Contractor Code of Conduct
- SELCP ICT – Acceptable Usage Policy
- SELCP ICT – Removable Media Policy
- SELCP ICT - Third Party Supplier Access Policy
- SELCP ICT - Systems Acquisition Development Policy
- SELCP ICT - Acceptable Usage Policy

15. Legal, regulatory and guidance references:

Key legal, regulatory and guidance references for the Competence and Conduct policy:

- Housing & Regeneration Act 2008 (as amended)
- Competence and Conduct Standard (Government Direction, 30 September 2025)
- Policy Statement on Qualification Requirements for Social Housing (MHCLG/DLUHC)
- Competence & Conduct Standard Policy Statement
- Wider Policy context – Social Housing Professionalisation Programme
- Professionalisation Guidance (CIH)
- CIPD Code of Conduct & Ethics