Telford & Wrekin
Co-operative Council

Protect, care and invest
to create a better borough

# Housing Management

# Competence and Conduct Standard Policy

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Version 1.0 | October 2026

## 1. Policy statement and purpose

This policy statement sets out Telford & Wrekin Council's overarching commitment to meeting the Regulator of Social Housing (RSH) Competence and Conduct Standard (the 'Standard') and requirements as set out in Chapters 1 to 6 of the Government's Policy Statement on Qualifications Requirements for Social Housing.

It sets out how we will ensure that relevant staff have the skills, knowledge, experience and behaviours required to deliver good quality landlord services, in particular the approach to

- managing and developing the skills, knowledge, experience and behaviours of relevant staff and how we will tailor this approach, as appropriate, to the different roles of relevant staff within their organisation

- learning and development for relevant staff and how staff maintain and demonstrate appropriate and up to date skills, knowledge, experience and behaviours in their roles

- regularly reviewing the performance of relevant staff, including approach to managing poor performance.

We will comply with the Standard, including the required outcomes and specific expectations applying to registered providers, and with all applicable requirements set out in Chapters 1 to 6 of the Government's Policy Statement on Qualifications Requirements for Social Housing.

Our approach will ensure that relevant staff are recruited, inducted, trained, developed, appraised and supported in a way that reflects their role, responsibilities and level of contact with tenants. We will also take appropriate steps to satisfy ourselves that service providers delivering landlord services on our behalf have suitable arrangements in place for their relevant staff.

## 2. Policy Scope

This statement applies to all relevant staff involved in the provision of landlord services, including employees, managers, senior housing managers and senior housing executives. It also applies to the arrangements we put in place with service providers where their staff are involved in delivering landlord services on our behalf.

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## 3. Objectives

- Meet the Regulator of Social Housing Competence and Conduct Standard
- Embed the Council's Co-operative values of openness and honesty, ownership, fairness and respect, and involvement.
- Maintain role-specific competence rather than relying on job title or length of service alone.
- Support professional learning and recognised housing qualifications where required or justified.
- Recognise vulnerability, make reasonable adjustments, challenge stigma and learn from tenant feedback and complaints.
- Maintain auditable evidence for leadership, tenants, auditors and the regulator.

## 4. Status

The policy supplements, and does not replace, the Council Code of Conduct, contracts of employment, role profiles, collective agreements or corporate policies. Breaches will be considered under the appropriate management or contractual process, with fairness, evidence, support and procedural rights.

## 5. Legal and regulatory framework

The Competence and Conduct Standard applies to registered providers in England. Relevant staff are staff involved in the provision of landlord services, meaning services connected with the management of social housing. Providers must also take appropriate steps regarding relevant staff of service providers.

| Source | Status | Policy response |
|---|---|---|
| Housing and Regeneration Act 2008(as amended) | Legislation | Basis for consumer regulation and directions. |
| Social Housing (Regulation) Act 2023 | Legislation | Strengthened consumer regulation and enabled competence and conduct requirements. |
| Competence and Conduct Standard, effective 1 October 2026 | Regulatory standard | Written policy, learning and development, appraisal, poor-performance arrangements, contractor assurance, code of conduct, tenant influence and accessibility. |
| Government Policy Statement on Qualification Requirements for Social Housing | Government requirements reflected by the Standard | Applicable mandatory qualification rules must be followed. |
| Equality Act 2010 | Legislation | Equality, non-discrimination and reasonable adjustments. |

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| Source | Status | Policy response |
|---|---|---|
| Data Protection Act 2018 and UK GDPR | Legislation | Lawful, fair and secure workforce records. |
| Housing Ombudsman Complaint Handling Code | Statutory code | Learning from complaints and respectful, accessible complaint handling. |

## 6. Scope and role-identification method

### 6.1 Functional test

A role is in scope where its duties materially involve delivering, managing, deciding, supervising, assuring or commissioning services connected with the management of the Council's social housing. The assessment is based on actual duties, decision-making and tenant impact, not directorate location or job title.

Scope treatment is defined as:

- **Full internal framework**: All competency, conduct, supervision, CPD and assessment requirements apply.
- **Tailored internal framework**: Only the elements relevant to the role apply.
- **Out of scope**: Role is not undertaking housing management functions and is not covered by the framework.
- **Role assessment required**: Further review needed to determine the appropriate level of inclusion.

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## 7. Access to Learning & Development

Having the right people with the right skills allows us to deliver the excellent services that our residents and businesses within the borough expect from us. We achieve this by investing in our workforce and supporting our employees to develop and thrive at work.

At the Council we promote and nurture development whenever we can by offering:

- A varied suite of eLearning and face to face training, which supports personal and professional development
- Personalised, one-to-one coaching and mentoring opportunities through our pool of coaches/mentors
- Continuous professional development opportunities
- Financial support to achieve professional qualifications and upskilling through the apprenticeship levy
- Regular one-to-one discussions between employees and their managers
- Annual performance and development conversations

## 8. Core in-scope roles

| Role/function | Scope treatment | Reason |
|---|---|---|
| Property Management Officers | Full internal framework | Manage tenancies and tenants, collect rent, make or recommend landlord decisions. |
| Tenancy Sustainment Officers | Full internal framework | Provide support intended to sustain Council tenancies and manage vulnerability and safeguarding interfaces. |
| Senior Property Management Officer | Full internal framework | Supervise, assure and manage landlord services. |
| Head of Housing Solutions | Full internal framework; assess mandatory qualification status | Strategic accountability for relevant landlord services. |
| Maintenance (employees who manage landlord repairs, safety or contractor delivery) | Tailored internal framework after role assessment | Direct influence on quality, safety and tenant outcomes. |
| Dedicated housing complaint/customer-relations staff | Tailored framework where they determine landlord complaints | Complaint decisions and learning are landlord-service activities. |

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### 8.1 Service-provider assurance scope

External repairs, maintenance, safety, servicing, cleaning, grounds, planned works and specialist contractors are addressed through contractual assurance. Individual contractor workers are not enrolled in the Council appraisal system, but the Council shall ensure that relevant contractor staff are competent and exhibit appropriate behaviours.

### 8.2 Normally out of scope

| Role/function | Treatment |
|---|---|
| Homelessness and housing-options services | Outside this landlord-services policy unless a post separately performs social-housing management duties. |
| Strategic housing, enabling and development | Outside of scope unless actual duties include management of existing social housing. |
| Generic corporate customer services | Outside; reassess dedicated landlord enquiry or complaint activity. |
| HR, Finance, Legal, ICT, Procurement and Communications | Outside as corporate support; subject to their own professional and corporate standards. |
| Elected members | Outside employee scope; separate member standards apply. |

### 8.3 Review of role-mapping process

- Relevant manager completes a role-scope assessment against actual duties.
- Contract managers map outsourced landlord activities and assurance controls.
- Housing Management Board approves the register and records rationale.
- All relevant services to reassess after restructures, insourcing, outsourcing, material role change or regulatory change.

## 9. Responsibilities and governance

| Role | Responsibility |
|---|---|
| Housing Management Board | Approve policy and receive assurance. |
| Director responsible for Housing | Executive accountability, resources and escalation. |
| Head of Housing Solutions | Policy owner; scope register, workforce plan, qualification plan and annual assurance. |
| Housing managers/team leaders | Assess competence, supervise, support learning, address gaps and retain evidence. |
| Employees | Maintain competence, follow codes, complete learning, reflect, disclose gaps and speak up. |

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| Role | Responsibility |
|---|---|
| Procurement/contract managers | Embed and monitor service-provider competence and conduct. |
| Tenant scrutiny arrangements | Influence, challenge and review policy and outcomes. |

### 9.1 Governance cycle

- Monthly supervision including review of learning and gaps in knowledge.
- Quarterly review of risks, qualifications, complaints and contractor performance at Housing Management Board.
- Annual tenant involvement.
- Immediate escalation of serious safety, safeguarding, misconduct or systemic competence concerns.

## 10. Telford & Wrekin and housing conduct standards

The Council expects all employees undertaking housing functions to demonstrate behaviours consistent with Telford & Wrekin Council Code of Conduct and the Chartered Institute of Housing Professional Standards. This applies to employees and requires agents, agency workers, contractors, suppliers, consultants and partners to uphold its standards.

These standards should be reflected through:

- Day-to-day professional conduct.
- Service delivery and decision making.
- Continuous professional development (CPD).
- Performance and development discussions.
- Training and qualification pathways.
- Resident, tenant and stakeholder engagement.
- Compliance with the Council's Code of Conduct and all relevant housing legislation.

Managers are responsible for supporting staff to identify development needs and maintain the knowledge, skills and behaviours necessary to deliver safe, effective and resident-focused housing services that meet both regulatory expectations and organisational objectives.

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| Council Code theme | Housing application |
|---|---|
| Openness and honesty | Explain decisions, give accurate information, record reasoning and correct errors. |
| Ownership | Take responsibility, follow through commitments, escalate barriers and learn from outcomes. |
| Fairness and respect | Treat tenants with dignity, avoid stigma and bias, make reasonable adjustments. |
| Involvement | Listen to tenants and enable meaningful influence and scrutiny. |
| Personal and business integrity | Act lawfully, declare conflicts, resist fraud/bribery and protect public resources. |
| Making every contact count | Recognise vulnerability, safeguard, refer appropriately and avoid unnecessary repeat contact. |
| Open and honest working relationships | Speak up, challenge unsafe or disrespectful practice and support colleagues. |
| Keeping assets and data safe | Maintain accurate records, protect information and safeguard homes and Council resources. |

CIH Professional Standards:

| CIH Professional Standard | Standard Expectations | Application Within Housing Services |
|---|---|---|
| Integrity | Acts honestly, transparently and in the best interests of customers and communities. | Making fair and evidence-based decisions, maintaining confidentiality, delivering impartial housing advice, and acting professionally in all interactions. |
| Inclusive | Ensures services are accessible, fair and responsive to diverse needs. | Supporting vulnerable households, applying equality principles, providing reasonable adjustments, and delivering person-centred services. |
| Ethical | Applies professional values consistently and challenges poor practice. | Making balanced enforcement decisions, safeguarding residents, maintaining professional boundaries, and promoting accountability. |
| Knowledgeable | Maintains current knowledge of legislation, policy and best practice. | Applying homelessness legislation, housing management requirements, housing standards, regulatory requirements and emerging reforms. |

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| | | | |
|---|---|---|---|
| Skilled | Demonstrates the practical skills required to deliver effective housing services. | Case management, housing assessments, tenancy management, inspection activity, negotiation and problem solving. | |
| Advocate | Promotes the value of housing services and champions positive outcomes for residents. | Supporting tenancy sustainment, preventing homelessness, working with partners and advocating for vulnerable residents. | |
| Leadership | Demonstrates leadership behaviours and drives service improvement. | Leading change, promoting service excellence, supporting colleagues, driving innovation and improving outcomes for residents and communities. | |

**11. Housing professional conduct additions**

The following additions reflect housing professional practice, including principles associated with Chartered Institute of Housing professional conduct, where not already explicit in the Council Code.

- Put residents' safety, dignity and legitimate interests at the centre of professional judgement.
- Do not stigmatise tenants or make assumptions based on tenure, income, disability, ethnicity, family status or other characteristics.
- Maintain professional competence and recognise the limits of personal authority or expertise.
- Use evidence, law, policy and proportionality in decisions, and record the reasons.
- Treat complaints, damp and mould reports, repair concerns and safeguarding indicators seriously and without defensive behaviour.
- Challenge misconduct, unsafe practice, discrimination and service failure, using Speak Up routes where appropriate.
- Protect confidentiality while sharing information lawfully where safety or safeguarding requires it.
- Avoid conflicts of interest and do not use professional position for improper advantage.
- Support tenant voice, communicate accessibly and be candid where the Council has fallen short.
- Undertake continuous professional development and contribute to improving the profession.

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## 12. Qualifications framework

Applicable staff identified by the Government Policy Statement must hold, or be working towards, a relevant qualification within the prescribed transition arrangements. The Council will make determinations using the final policy definitions, actual responsibilities and current organisational structure.

The Government response states that the Standard takes effect on 1 October 2026 and provides a three-year transition period for senior housing managers and executives, with four years for registered providers owning fewer than 1,000 homes and their service providers. The definitive Policy Statement must be checked when classifying individuals.

| Category | Policy requirement | Officer |
|---|---|---|
| Senior Housing Manager | Relevant level 4 housing-management qualification, or permitted equivalent | Senior Property Management Officer |
| Senior Housing Executive | Relevant foundation degree or level 5 housing-management qualification | Head of Housing Solutions |
| Other in-scope staff | No blanket statutory CIH qualification is asserted by this policy. Role competence must be demonstrated. | Property Management Officers.<br>Business Administration<br>Customer Relations? |
| Technical maintenance roles | Relevant trade, safety, technical or contract-management competence as required by law, role and risk. | BiT Help Desk<br>Surveyors |
| Contractor staff | Contractual evidence of qualifications, competence, supervision and conduct appropriate to activity. | Contractors |

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## 13 Knowledge, skills, experience and behaviours

### 13.1 Common knowledge

- Council tenancy framework and relevant sections of housing law
- Regulator consumer standards and tenant outcomes
- Rent-setting and collection responsibilities relevant to role
- Repairs, damp and mould escalation, property condition and safety interfaces
- Complaints and Housing Ombudsman expectations
- Safeguarding adults and children, domestic abuse and vulnerability
- Equality, human rights, reasonable adjustments and accessible communication
- Data protection, confidentiality, records and information sharing
- Council policies, delegation, financial controls and Speak Up arrangements

### 13.2 Common skills

- Active listening and respectful communication
- Accurate case recording and evidence evaluation
- Risk assessment, professional curiosity and escalation
- Proportionate decision-making and clear reasons
- Collaborative problem-solving and referral
- Conflict management and de-escalation
- Digital competence and information security
- Reflective learning and application of feedback

### 13.3 Experience and behaviours

- Supervised practice appropriate to risk before independent decisions
- Respect, integrity, accountability and candour
- Tenant focus without promising outcomes outside authority
- Consistency, fairness and avoidance of stigma
- Willingness to challenge, learn and speak up

## 14. Workforce development plan

| Objective | Actions | Measure | Owner | Frequency |
|---|---|---|---|---|
| Complete scope mapping | Approve role and contractor registers | 100% roles assessed | Head of Housing Solutions | Annual/change |
| Establish baseline | Skills, qualification and conduct self-assessment plus manager moderation | 100% in-scope staff baseline | Managers | At implementation/new starter |

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| Objective | Actions | Measure | Owner | Frequency |
|---|---|---|---|---|
| Close priority gaps | Individual and team plans focused on safety, tenant impact and regulatory risk | High-risk gaps actioned | Managers | Quarterly |
| Meet qualification rules | Classify relevant managers/executives; enrol and support where required | Compliance with transition | Legal/Head of Housing/ | Annually/change |
| Embed conduct | Induction, scenarios, supervision and tenant feedback | Evidence of understanding | Managers | Ongoing |
| Assure contractors | Contract requirements, evidence sampling and tenant outcomes | Assurance rating | Contract managers | Quarterly |
| Evaluate impact | Use complaints, audits, satisfaction, service performance and safeguarding learning | Improvement demonstrated | Leadership | Six-monthly |

### 14.1 Prioritisation

Development resources will be prioritised according to safety, legal and regulatory exposure, tenant impact, frequency of decision, identified performance gap, role criticality and transition deadlines.

## 15. Identifying and assessing development needs

### 15.1 Evidence sources

- Recruitment evidence and role-specific assessment
- Induction and probation reviews
- Annual appraisal and at least monthly one-to-ones
- Observed practice and accompanied visits
- Case, call and record audits
- Quality of decisions, timeliness and follow-through
- Tenant feedback, complaints and Ombudsman learning
- Safeguarding and safety incident reviews
- Performance information and exception reports
- Changes in law, standards, policy, technology or service design
- Employee self-reflection and professional CPD records

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### 15.2 Assessment scale

| Rating | Meaning | Management response |
|---|---|---|
| 1: Awareness | Recognises issue but cannot yet apply independently | Training and supervised practice |
| 2: Developing | Applies routine tasks with support | Coaching and evidence plan |
| 3: Competent | Consistently performs role to required standard | Maintain and refresh |
| 4: Advanced | Handles complexity and supports others | Use in coaching/quality assurance |
| 5: Strategic/expert | Shapes systems and assures organisational practice | Succession and organisational learning |

## 16. Performance, poor performance and support

Where a competence gaps are identified, manager must address the issue immediately with the member of staff or contractor. Identifying the reason and whether the issue is due to capability, conduct, system design, workload, unclear instruction, disability or health factors, and lack of access to learning. Responses must be fair, proportionate and consistent with Council procedures.

### 16.1 Response steps

- Make immediate services safe and protect residents.
- Clarify expected standard and evidence of the gap.
- Listen to the employee and consider context and reasonable adjustments.
- Agree a time-bound support plan with learning, supervision and review evidence.
- Restrict unsupervised high-risk activity where proportionate.
- Review progress and document outcomes.
- Use formal capability or disciplinary routes only under the relevant Council policy and with HR advice.
- Escalate suspected serious misconduct, fraud, discrimination, safeguarding failure or deliberate concealment promptly.

### 16.2 Recognition

Good practice, improvement, professional learning and contributions to tenant outcomes should be recognised through supervision, appraisal and development opportunities.

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## 17. Learning, CPD and professional practice

### 17.1 Learning offer

- Corporate and housing induction
- Mandatory corporate learning
- Role-specific technical modules
- Supervised casework and observation
- Coaching, mentoring and peer review
- Case-law, policy and regulatory updates
- Professional qualifications where required or agreed
- Learning from tenants, complaints, incidents and audits
- Communities of practice and cross-service learning

### 17.2 CPD expectation

Every in-scope employee must maintain an annual CPD record appropriate to role. The Council does not create a universal hours requirement in this policy. Where a professional body or qualification imposes a requirement, that requirement applies to the relevant individual.

### 17.3 Evaluation

- Immediate learner feedback
- Knowledge check or observed application
- Follow-up case audit
- Impact on resident experience, quality or risk
- Manager confirmation that learning has transferred to practice

## 18. Contractor and service-provider assurance

Contracts for relevant landlord services must include proportionate competence and conduct requirements. Procurement and contract management must be coordinated with Housing, Health and Safety, Legal and tenant-facing assurance.

| Stage | Minimum evidence |
|---|---|
| Pre-procurement | Service risk assessment; required qualifications/accreditations; conduct and tenant-contact standards. |
| Selection | Competence evidence, supervision arrangements, training, references and safety systems. |

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| Stage | Minimum evidence |
|---|---|
| Mobilisation | Named accountable leads, verified records, induction to Council/tenant standards, complaints and safeguarding routes. |
| Delivery | Sampling of qualifications, audits, tenant feedback, complaints, quality and safety performance. |
| Failure | Corrective action, increased supervision, withholding/remedies where contractual, escalation or termination as appropriate. |
| Renewal | Whole-contract competence and conduct review, lessons and updated specification. |

### 18.1 Required behaviours

- Respect tenants and homes
- Carry identification and communicate clearly
- Protect confidentiality
- Report safeguarding and property risks
- Keep appointments and records
- Avoid stigma, harassment and discrimination
- Cooperate with complaints and learning

## 19. Tenant influence, accessibility and scrutiny

The written policy and adopted code arrangements will be accessible to tenants. Tenants will have meaningful opportunities to influence and scrutinise development, adoption and review.

- Publish an accessible summary and explain how to request alternatives.
- Consult tenants on the behaviours and service standards that matter to them.
- Use diverse channels and make reasonable adjustments.
- Provide tenant scrutiny with evidence on training, competence, complaints and contractor outcomes while protecting employee privacy.
- Explain decisions following consultation, including changes made and reasons where suggestions are not adopted.
- Include tenant feedback in annual review and workforce priorities.

### 19.1 Boundaries

Tenant involvement concerns systems, standards and outcomes. It will not disclose confidential employee data or substitute for fair employment procedures.

## 20. Equality, safeguarding and data protection

- Complete and maintain an Equality Impact Assessment.

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- Provide reasonable adjustments for employees and tenants.
- Check for bias in assessment criteria, access to qualifications and progression.
- Avoid treating communication style, disability or caring responsibility as lack of competence without objective evidence.
- Escalate safeguarding concerns under Council procedures.
- Use trauma-aware and person-centred approaches without exceeding professional role boundaries.
- Undertake Data Protection Impact Assessment where new workforce systems or extensive monitoring create elevated privacy risk.

**21. Procedural fairness**

Employees must know the standard, evidence and consequences; have an opportunity to respond; receive appropriate support; and have access to relevant Council review or appeal routes.

**22. Key indicators**

- Percentage of roles scoped and reviewed
- Percentage of in-scope staff assessed
- Mandatory learning completion
- Qualification compliance and progress
- Tenant complaints and learning completion
- Contractor assurance findings

**23. Related documents**

- Telford & Wrekin Council Code of Conduct
- Council disciplinary, grievance, Speak Up, equality, health and safety, data protection and information-security policies
- Housing management procedures and role profiles
- Contract procedure rules and relevant contract specifications
- Housing Ombudsman Complaint Handling Code and landlord complaints policy

| Document control | Detail |
|---|---|
| Policy owner | Head of Housing Solutions |
| Approval body | Housing Management Board |
| Effective date | |
| Review date | 12 months after approval, then at least annually |
| Status | Draft for consultation and approval |
| Date regulatory sources checked | |

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**Summary of changes table**

| Revision history | | | |
|---|---|---|---|
| **Author** | **Summary of changes** | **Version** | **Authorised by & date** |
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