

CABINET

23 OCTOBER 2026

REPORT OF THE PORTFOLIO HOLDER FOR HOUSING AND PLANNING

A.2 CONSIDERATION AND ADOPTION OF THE HOUSING COMPETENCE AND CONDUCT POLICY

(Report prepared by Matthew Wicks)

PART 1 – KEY INFORMATION

PURPOSE OF THE REPORT

To present to Cabinet the Housing Competence and Conduct Policy for consideration and adoption.

EXECUTIVE SUMMARY

This report presents the Housing Competence and Conduct Policy for adoption. The policy builds on the strong services already delivered by housing staff and provides a consistent framework to ensure that employees and relevant service providers have the knowledge, skills, experience and behaviours needed to deliver high-quality landlord services. The policy embeds the Chartered Institute of Housing Professional Standards and a Housing Code of Conduct for Staff.

The policy will support the development of a competent and professional workforce that supports better decisions and more consistent services; this improves tenants' experience and outcomes; and effective governance and evidence provide assurance that standards are being maintained.

The policy covers workforce planning, recruitment, induction, learning and development, professional qualifications, appraisal, performance management and tenant oversight. Tenant feedback has been incorporated into the final version of the policy, with being treated respectfully, being listened to, receiving an empathetic response and being kept informed identified as the key themes. The full tenant feedback on the policy is available on the Council's website. The Code of Conduct that is appended to the policy is subject to tenant scrutiny and feedback. Consultation closes on the 28 October 2026 and any feedback received will be incorporated into the policy in line with the delegated powers referred to in Recommendation 2 (below).

The policy also supports compliance with the Regulator of Social Housing's Competence and Conduct Standard and associated qualification requirements. Implementation will be monitored through the Competence and Conduct Action Plan, providing assurance that development needs are addressed, professional standards are maintained and continuous improvement is embedded across the Council's landlord services.

RECOMMENDATION(S)

It is recommended that Cabinet:

- 1) Considers and agrees to adopt the Housing Competence and Conduct Policy (Appendix A) for implementation; and,**

2) Delegates authority to the Corporate Director for Operations and Delivery to make future updates or amendments to the policy in consultation with the Portfolio Holder responsible for Housing. The policy will be reviewed annually during implementation of the Competence and Conduct Action Plan and no later than October 2027, unless earlier review is required in response to tenant feedback.

REASON(S) FOR THE RECOMMENDATION(S)

The recommendations ensure that the policy is appropriately adopted in accordance with the Council's Constitution and provide evidence that the Council has a clear, accountable framework for meeting the Competence and Conduct Standard and associated qualification requirements.

ALTERNATIVE OPTIONS CONSIDERED

The alternative would be not to adopt a specific Housing Competence and Conduct Policy and to rely on existing corporate employment and learning arrangements. This option is not recommended because the Regulator of Social Housing's Competence and Conduct Standard requires registered providers to have a written policy covering the management and development of relevant staff, learning and development, appraisal and performance management, and the steps taken in relation to relevant staff employed by service providers.

Failure to meet the Standard could expose the Council to regulatory scrutiny and enforcement action, while also increasing operational risks arising from inconsistent practice, skills gaps, inadequate oversight and conduct that does not meet the expectations of tenants or the Council.

Without a consolidated and published policy, responsibilities and evidence requirements would be less clear, making consistent implementation, tenant scrutiny and assurance more difficult. Adoption is therefore the most appropriate option.

PART 2 – IMPLICATIONS OF THE DECISION

DELIVERING PRIORITIES

The policy contributes to a number of Corporate Plan 2024-28 themes:

- Pride in our area and services to residents
- Raising aspirations and creating opportunities
- Working with partners to improve quality of life
- Financial sustainability and openness

The Policy also links with the Council's Housing Strategy 2026-30, in particular the first priority - *To maintain and improve our existing council housing stock.*

The Council is developing a Housing Improvement Plan for approval that also contains priorities around staff competence and conduct.

OUTCOME OF CONSULTATION AND ENGAGEMENT (including with the relevant Overview and Scrutiny Committee and other stakeholders where the item concerns proposals relating to the Budget and Policy Framework)

The Competence and Conduct Standard requires tenants to be given meaningful opportunities to influence and scrutinise the development of the written policy and decisions relating to the adoption or development of the Code of Conduct. Consultation has therefore included the Council's Tenant Panel and Tenant Reading Group who were sent a draft of the policy to comment on.

Relevant staff, managers and Human Resources have also been engaged through the policy-development and implementation arrangements. Tenant feedback has been incorporated into the final version of the policy. The key themes were the importance of tenants being treated respectfully, listened to, shown empathy and kept informed. The full feedback is available on our website: [Housing Competence and Conduct Policy: Consultation Feedback](#)

The Code of Conduct for staff has been drafted following receipt of the tenant feedback on the policy and the Council's Tenant Panel and Tenant Reading Group will be sent a copy of that to provide their feedback on.

Through Tenant Panel meetings and other appropriate engagement opportunities, tenants will be invited to monitor progress against the delivery of the policy and the action plan. Officers will also explore how tenants can assess how the Code of Conduct works in practice.

LEGAL REQUIREMENTS (including legislation & constitutional powers)

Is the recommendation a Key Decision (see the criteria stated here)	YES	If Yes, indicate which by which criteria it is a Key Decision	X Significant effect on two or more wards ☐ Involves £100,000 expenditure/income ☐ Is otherwise significant for the service budget
		And when was the proposed decision published in the Notice of forthcoming decisions for the Council (must be 28 days at the latest prior to the meeting date)	23 September 2026

The Regulator of Social Housing sets consumer standards under powers conferred by the Housing and Regeneration Act 2008.

In September 2025, the Secretary of State, at the time, in exercise of the powers conferred by section 197(2A)(a) and (c) of the Housing and Regeneration Act 2008 gave a Direction, with regard to the Regulator of Social Housing's (the Regulator) fundamental objectives in respect of "the Regulatory Standards (Competence and Conduct) 2025".

The Regulator must set a standard for registered providers in matters relating to the competence and conduct of relevant individuals, known as the Competence and Conduct Standard. This requires registered providers to secure that those of their staff who are relevant individuals have the necessary

skills, knowledge and experience, and exhibit the behaviours needed, for the relevant services provided by those individuals to be of a good quality.

The Competence and Conduct Standard must require registered providers to take appropriate steps to secure that those of their services providers' staff who are relevant individuals have the necessary skills, knowledge and experience, and exhibit the behaviours needed, for the relevant services provided by those individuals, under or pursuant to the relevant management services agreement, to be of a good quality.

The Competence and Conduct Standard must require registered providers—

- (a) to have a written policy setting out—
 - (i) their approach to managing and developing the skills, knowledge, experience and behaviours of those of their staff who are relevant individuals; and
 - (ii) the appropriate steps they will take to secure that those of their services providers' staff who are relevant individuals have the necessary skills, knowledge and experience and exhibit the behaviours needed for the relevant services provided by those individuals, under or pursuant to the relevant management services agreement, to be of a good quality; and
- (iii)
- (b) to give tenants meaningful opportunities to influence and scrutinise the development of this policy;
- (c) to ensure that the policy is kept up to date and fit for purpose; and
- (d) to ensure that the policy is made accessible to tenants.

The written policy must, in particular—

- (a) ensure that the approach to managing and developing the skills, knowledge, experience and behaviours of those of the registered provider's staff who are relevant individuals is tailored, as appropriate, to the different roles of those relevant individuals within the registered provider;
- (b) set out the registered provider's approach to learning and development for those of its staff who are relevant individuals including how it will ensure that they maintain and demonstrate appropriate and up to date skills, knowledge, experience and behaviours for their roles within the registered provider;
- (c) set out the registered provider's approach to appraising those of its staff who are relevant individuals and regularly reviewing their performance; and
- (d) set out the registered provider's approach to managing poor performance of those of its staff who are relevant individuals.

The Competence and Conduct Standard must require registered providers—

- (a) to adopt or develop an appropriate code of conduct for those of their staff who are relevant individuals and to ensure this is embedded within their organisation ("code of conduct");
- (b) to give tenants meaningful opportunities to influence and scrutinise decisions relating to the adoption or development of the code of conduct;
- (c) to ensure that the code of conduct is kept up to date and fit for purpose; and
- (d) to ensure that the code of conduct is made accessible to tenants.

Following consultation, the Competence and Conduct Standard was published on 9th July 2026, coming into effect from 1st October 2026, as part of Regulator for Social Housing's consumer standards. The standard, as required by the Secretary of State's Direction, includes a requirement for landlords to meet all applicable requirements as set out in Chapters 1 to 6 of the government's Policy Statement on Qualification Requirements for Social Housing (the Policy Statement).

The standard has the following Required Outcomes & Specific expectations

1.1 Registered providers must:

- (a) secure that their relevant staff have the necessary skills, knowledge and experience, and exhibit the behaviours needed, for the landlord services to be of good quality; and
- (b) take appropriate steps to secure that the relevant staff of their services providers have the necessary skills, knowledge and experience, and exhibit the behaviours needed, for the landlord services to be of good quality.

2.2 Registered providers must have a written policy which includes:

- (a) their approach to managing and developing the skills, knowledge, experience and behaviours of their relevant staff and how they will tailor this approach, as appropriate, to the different roles of relevant staff within their organisation
- (b) their approach to learning and development for their relevant staff. This must include how they ensure that their relevant staff maintain and demonstrate appropriate and up to date skills, knowledge, experience and behaviours in their roles
- (c) their approach to appraising and regularly reviewing the performance of their relevant staff, including their approach to managing poor performance; and
- (d) the appropriate steps they will take to secure that the relevant staff of their services providers have the necessary skills, knowledge and experience, and exhibit the behaviours needed, for the landlord services to be of good quality.

2.3 Registered providers must develop or adopt an appropriate code of conduct for their relevant staff and ensure it is embedded within their organisation.

2.4 Registered providers must ensure that the written policy and the code of conduct referred to in 2.2 and 2.3 are kept up to date, fit for purpose and are accessible to tenants. Tenants must be given meaningful opportunities to influence and scrutinise the development of the written policy and decisions relating to the adoption or development of the code of conduct.

YES	The Monitoring Officer confirms they have been made aware of the above and any additional comments from them are below:
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For the purposes of this report the Monitoring Officer has completed the legal section above to set out the legislative framework in which this requirement sits.

FINANCE AND OTHER RESOURCE IMPLICATIONS

Implementation will be managed through existing workforce planning, Human Resources, learning and development, appraisal and contract-management arrangements. There may be costs associated with approved professional qualifications, training, professional development, backfill and maintaining appropriate records. These will be identified and managed through existing service budgets and the Council's normal budget-setting and workforce-planning processes. Any material additional requirement will be reported and considered through the appropriate governance route.

X	The Section 151 Officer confirms they have been made aware of the above and any additional comments from them are below:
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There are no comments over and above those set out elsewhere in this report.

USE OF RESOURCES AND VALUE FOR MONEY	
The following are submitted in respect of the indicated use of resources and value for money indicators:	
A) Financial sustainability: how the body plans and manages its resources to ensure it can continue to deliver its services;	The Council has an adopted 30-year Housing Revenue Account Business Plan and established corporate arrangements for workforce planning, learning and development, performance management and procurement. The appended policy will strengthen governance by bringing these arrangements together for landlord services, clarifying accountability and supporting proportionate investment in staff competence, qualifications and professional conduct. A clear framework will help the Council target development activity, maintain assurance records, identify risks earlier and support consistent, effective services for tenants.
B) Governance: how the body ensures that it makes informed decisions and properly manages its risks, including; and	
C) Improving economy, efficiency and effectiveness: how the body uses information about its costs and performance to improve the way it manages and delivers its services.	
MILESTONES AND DELIVERY	
<p>If Cabinet agrees to adoption, the policy will come into effect immediately, subject to call-in. Implementation will include communicating the policy, identifying relevant roles; completing a workforce and qualification assessment; confirming individual development plans; reviewing relevant service-provider arrangements; and establishing records for monitoring and assurance. Communications and implementation activity will reinforce the tenant-feedback themes of respectful treatment, being listened to, empathy and being kept informed.</p> <p>Progress will be monitored through the Council's Competence and Conduct Action Plan and established governance arrangements. The policy will be reviewed annually during implementation of the Competence and Conduct Action Plan and no later than October 2027, unless earlier review is required, with delegated authority to the Corporate Director – Operations and Delivery to make changes in consultation with the Portfolio Holder responsible for Housing.</p>	
ASSOCIATED RISKS AND MITIGATION	
<p>The policy has been written to support compliance with the Competence and Conduct Standard and applicable qualification requirements, and to promote consistent, professional and respectful landlord services.</p> <p>Key risks include failure to identify staff within scope, insufficient progress towards required qualifications, inconsistent appraisal or development arrangements, inadequate oversight of service providers, poor record keeping, and conduct falling below expected standards. These risks could affect service quality, tenant trust, employee capability and regulatory compliance.</p> <p>Mitigation will include clear ownership, role and training-needs assessments, agreed qualification pathways, regular appraisal and supervision, appropriate management of poor performance, contract and procurement controls, auditable records, tenant scrutiny and periodic reporting through the Council's governance arrangements. Monitoring will also consider how consistently services reflect the tenant-feedback themes of respectful treatment, being listened to, empathy and being kept informed.</p>	
EQUALITY IMPLICATIONS	
In line with the Public Sector Equality Duty, the Council will have due regard to the need to eliminate	

discrimination, harassment and victimisation, advance equality of opportunity and foster good relations. Competence, development and conduct expectations will be applied fairly and consistently, with reasonable adjustments and accessible learning arrangements considered where required. Monitoring will support the identification and response to any disproportionate impacts.

SOCIAL VALUE CONSIDERATIONS

The policy supports social value by investing in a skilled, knowledgeable and ethical housing workforce, strengthening professional leadership, improving consistency and accountability, and ensuring that tenants are treated with respect and are able to influence and scrutinise the services they receive.

IMPLICATIONS RELATED TO DEVOLUTION AND/OR LOCAL GOVERNMENT REORGANISATION

On 7th September 2026, the Secretary of State for Housing, Communities and Local Government announced in Parliament that a review of the Local Government Reorganisation programme was commencing and that the decision made in March 2026 for Greater Essex (and other areas) had been withdrawn in light of new legal advice. Following this announcement, local authorities received correspondence from the Minister of Housing, Communities and Local Government (MHCLG) requesting that until this review has concluded, Councils cease work on implementing the decisions that have previously been announced. The timetable for completion of the review is unknown at this time.

This proposal is not impacted by MHCLG's request. The Council remains responsible, as a registered provider of social housing, for preparing to meet the Competence and Conduct Standard and applicable qualification requirements from October 2026. The policy also provides a clear framework for maintaining professional standards and organisational assurance during any future structural change.

IMPLICATIONS FOR THE COUNCIL'S AIM TO BE NET ZERO BY 2050

The implementation of this policy does not present a direct impact on the Council's target for net zero greenhouse gas emissions from its business operations by 2050. The Council will be mindful of energy efficiency measures, wherever relevant, in the implementation of its policies.

OTHER RELEVANT CONSIDERATIONS OR IMPLICATIONS

Consideration has been given to the implications of the proposed decision in respect of the following and any significant issues are set out below.

Crime and Disorder	The implementation of this policy is not considered to have any crime and disorder implications.
Health Inequalities	None
Subsidy Control (the requirements of the Subsidy Control Act 2022 and the related Statutory Guidance)	The Council will follow subsidy control legislation and regulations, where applicable, in relation to the content and implementation of this policy.
Area or Ward affected	All

PART 3 – SUPPORTING INFORMATION

BACKGROUND

The Regulator of Social Housing's Competence and Conduct Standard, made under the Housing and Regeneration Act 2008, came into force in October 2026. The proposed Housing Competence and Conduct Policy attached as Appendix A sets out the Council's approach to ensuring that relevant staff and relevant staff of service providers have the competence and behaviours required to deliver good-quality landlord services. The policy is supported by the Chartered Institute of Housing Professional Standards and the Housing Code of Conduct for Staff. Tenant feedback has been incorporated into the final version, with respect, being listened to, empathy and being kept informed identified as the key themes. The full tenant feedback is available on the Council's website. The Policy:

- Defines how the Council will manage and develop the skills, knowledge, experience and behaviours of staff involved in landlord services.
- Sets expectations for induction, learning and development, continuing professional development, appraisal, supervision and the appropriate management of poor performance.
- Establishes arrangements for identifying staff within scope of statutory qualification requirements and supporting completion within the applicable transition periods.
- Adopts and embeds clear standards of professional conduct through the Housing Code of Conduct for Staff at Appendix D (within the policy), aligned with the Council's values and the Chartered Institute of Housing Professional Standards.
- Provides for proportionate assurance in relation to contractors and other service providers delivering landlord services.
- Supports transparency, tenant influence and scrutiny, equality, data protection and continuous improvement.

Policy Background

The Council has retained its housing stock and currently manages over 3,000 homes as well as more than 400 leasehold properties and 350 garages.

The Social Housing (Regulation) Act 2023 strengthened the regulatory framework for social housing and enabled the introduction of requirements relating to the competence and conduct of staff. The Standard responds to sector-wide concerns about professionalism, culture, service quality and whether tenants are listened to and treated with respect.

The Competence and Conduct Standard requires registered providers to have a written policy addressing how they manage and develop relevant staff, tailor their approach to different roles, maintain up-to-date competence and behaviours, appraise performance, manage poor performance and secure appropriate standards from service providers. Providers must also develop or adopt an appropriate code of conduct, keep the policy and code up to date and accessible, and give tenants meaningful opportunities to influence and scrutinise them.

The Government's policy statement introduces mandatory housing-management qualification requirements for relevant senior housing executives and senior housing managers, subject to defined transition periods. The Council must therefore identify roles in scope, assess existing qualifications and experience, support appropriate pathways and maintain evidence of progress.

To meet its statutory and regulatory duties as a responsible social landlord, the Council needs a clear, documented and auditable framework that aligns housing workforce arrangements with these requirements. The policy provides that framework and links implementation to the Council's Competence and Conduct Action Plan.

Application of the Policy

The policy will apply to Council employees involved in the provision of landlord services and, where relevant, will inform the requirements and assurance arrangements applied to service providers. Managers will be responsible for identifying role requirements, agreeing development actions, conducting regular appraisal and supervision, addressing concerns fairly and promptly, and retaining appropriate evidence. Employees will be expected to maintain their competence, participate in required learning and development, comply with the code of conduct and raise any support or development needs. Implementation will be proportionate to role and risk and will operate alongside the Council's employment policies, equality duties, data-protection requirements, procurement arrangements and complaints framework.

PREVIOUS RELEVANT DECISIONS

None

BACKGROUND PAPERS AND PUBLISHED REFERENCE MATERIAL

Regulator of Social Housing, Competence and Conduct Standard;
Ministry of Housing, Communities and Local Government, Competence and Conduct Standard: Policy Statement;
Housing and Regeneration Act 2008;
Social Housing (Regulation) Act 2023;
The Council's Competence and Conduct Action Plan.

APPENDICES

- **Appendix A – Housing Competence and Conduct Policy**

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