

London Borough of
Hillingdon

Housing Competence and Conduct Standard Policy

1 October 2026



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Housing Competence and Conduct Standard Policy – 01.10.26

1. Policy Statement

The London Borough of Hillingdon is committed to ensuring that all Housing employees/workers have and maintain the knowledge, skills, experience and behaviours needed to deliver safe, effective, resident-focused and compliant housing services.

We recognise that a competent workforce is essential to providing high-quality services to tenants, leaseholders and residents. The Council will invest in learning and development, support professional growth and maintain arrangements to ensure competence is regularly assessed, monitored and evidenced.

This policy supports compliance with the Social Housing (Regulation) Act 2023, the Regulator of Social Housing (RSH) Consumer Standards, including the Competence and Conduct Standard, and other relevant legislative and regulatory requirements.

Equality implications were considered during the development of this policy and a separate Equality Impact Assessment was not deemed necessary. The Council will ensure that competence, learning and qualification requirements are applied fairly and will consider reasonable adjustments and alternative methods of demonstrating competence where appropriate, particularly where a protected characteristic may create barriers to participation.

2. Purpose and Scope

This policy sets out how the Council will:

- Support learning and development.
- Maintain a competent workforce.
- Meet the Housing Competence and Conduct Standard.
- Support professional qualifications.
- Monitor competence and performance.
- Address competence and performance concerns fairly and consistently.

Definition of Competence

Competence means having and maintaining the appropriate knowledge, skills, experience and behaviours required to perform a role effectively, safely, ethically and in accordance with legislative, regulatory and organisational requirements.

Competence is demonstrated not only through qualifications and training, but also through behaviour, service delivery, professional judgement, problem-solving, accountability, ownership of work, and practical application of learning. Resident feedback, complaints, compliments and other customer insight may be used as indicators when assessing competence and identifying development needs, but will not be treated as evidence of incompetence in isolation. Wider evidence, context,

caseload complexity, service pressures and management information will also be considered.

Scope

This policy applies to:

- Permanent employees
- Fixed-term employees
- Apprentices
- Agency staff undertaking housing functions
- Housing managers and senior leaders
- Contractors and others delivering landlord services and housing-related services on behalf of the Council where appropriate

For the purposes of this policy, landlord services are services connected with the management of social housing. Relevant employees/workers are those involved in the provision of landlord services. Within the Residents Services Directorate, this may include housing management, tenancy services, neighbourhood management, income management, leasehold and home ownership services, resident engagement, complaints handling, anti-social behaviour services, homelessness and housing advice services, housing allocations and lettings, independent living services, repairs, voids, caretaking, maintenance, compliance, building safety, asset management, estate management, capital programmes and other services connected with the management of social housing.

Qualification and competence requirements for individual roles are determined through the Role-to-Qualification Mapping Matrix. The Competence & Conduct Standard defines relevant staff as those involved in the provision of landlord services, and landlord services as services in connection with the management of social housing.

Relationship Between Policy Scope and Statutory Qualification Requirements

The scope of this Policy is intentionally wider than the statutory qualification requirements contained within the Regulator of Social Housing's Competence and Conduct Standard. The Council may therefore apply competence, conduct, learning and development expectations to roles that fall outside the statutory qualification requirements where doing so supports service quality, resident outcomes, workforce development and regulatory compliance.

Inclusion within this Policy does not automatically mean that an individual is required to hold or work towards a mandatory housing qualification. Qualification requirements will be determined through the Role-to-Qualification Mapping Matrix, taking account of:

- the individual's role and responsibilities;
- whether they have a substantive role in managing Housing Management Services;
- relevant regulatory guidance;

- organisational structures and service delivery arrangements;
- existing qualifications, equivalencies and professional experience; and
- any applicable exemptions or transitional arrangements.

The Council will assess qualification requirements on a role-by-role basis and record decisions through the Role-to-Qualification Mapping Matrix. Roles within the same service area may have different qualification requirements where responsibilities, accountability, decision-making authority or regulatory scope differ.

Where the Council determines that a role is not subject to the statutory qualification requirement, individuals will nevertheless be expected to maintain the knowledge, skills, experience and behaviours required to perform their role effectively and comply with the requirements of this Policy, the Housing Competence and Conduct Standard and any other applicable Council policies and procedures.

3. Principles

The Council will:

- Promote continuous learning and professional development.
- Provide fair and inclusive access to learning opportunities.
- Define competence requirements through the Housing Competence and Conduct Standard Framework.
- Support employees to achieve and maintain competence.
- Regularly assess competence and development needs.
- Maintain records to demonstrate compliance with competence requirements.
- Consider reasonable adjustments where required.

Information about this Policy will be available to residents in accessible formats on request, to help them understand it, hold the Council accountable to it, and engage with and contribute to future reviews of the Policy.

4. Housing Competence and Conduct Standard Framework and Qualifications

The Council will maintain a Housing Competence and Conduct Standard Framework that defines the knowledge, skills, experience and behaviours required for housing roles and demonstrates compliance with the Housing Competence and Conduct Standard. Role-specific competence requirements will include maintaining the knowledge, skills and experience required for the role, accurate record keeping, effective case management, information management, health and safety, building safety, safeguarding, risk management, and the appropriate use of relevant systems and technology required to deliver effective housing services.

The framework will support:

- Recruitment and selection.
- Induction and probation.
- Appraisal and performance management.
- Workforce planning and succession planning.

- Learning and development activities.

Recruitment, selection, induction and probation arrangements will be used to assess whether individuals possess, or can reasonably attain, the competence requirements of their role. Where development needs are identified, appropriate learning and support arrangements will be put in place.

Resident feedback, complaints, compliments, service performance information and other assurance activities will be considered alongside wider evidence when developing and reviewing competence requirements and workforce development priorities. Complaints or dissatisfaction will not be relied on in isolation, recognising that residents may complain even where employees have acted correctly.

The Council may require employees in designated housing roles to:

- Hold or achieve a specified qualification.
- Complete mandatory learning.
- Maintain professional accreditation where required.

Qualification requirements and completion timescales will be determined through the Role-to-Qualification Mapping Matrix within the Housing Competence and Conduct Standard Framework and associated guidance.

Employees and workers must complete the relevant mandatory training and refresher learning within required timescales.

Qualification planning, enrolment and monitoring will take account of the statutory transitional arrangements and the regulatory meaning of holding or working towards a Relevant Qualification, as set out in the RSH Competence and Conduct Standard Policy Statement.

5. Learning and Development

The Council will provide learning and development opportunities appropriate to role requirements and business needs.

Learning and development activities may include:

- Induction
- Mandatory learning
- Refresher training
- Continuing Professional Development (CPD)
- Housing policy and procedure
- Tenancy and leasehold management
- Repairs and asset management
- Complaints handling
- Safeguarding
- Health and safety, building safety and risk management
- Equality, diversity and inclusion

- Disability awareness, vulnerability and reasonable adjustments
- Customer service and communication skills
- Data protection and confidentiality
- Professional boundaries and conflicts of interest
- Understanding how to communicate effectively with residents with different needs and preferences

Learning requirements will be determined based on role requirements, competence assessments, regulatory requirements and identified development needs.

Learning and development may be delivered through:

- Professional qualifications.
- Formal training.
- E-learning.
- Workshops and seminars.
- Coaching and mentoring.
- Apprenticeships.
- Secondments.
- Job shadowing.
- Professional memberships.
- Communities of practice.
- Continuing Professional Development (CPD).

All employees/workers are expected to engage with agreed learning activities and demonstrate the application of learning within their role.

Employees undertaking qualifications provided by the Council via apprenticeships or commercial routes must sign and comply with a Learning Agreement.

New employees must complete an induction programme appropriate to their role.

The Council is committed to supporting employees to develop and maintain competence. Subject to operational requirements and relevant Council policies, support may include training opportunities, study leave, coaching, learning resources, professional qualification support, wellbeing support and reasonable adjustments where required.

Managers will consider employees' operational workloads, access to required systems and learning resources, qualification requirements and any reasonable adjustments when agreeing learning and development arrangements.

6. Performance, Appraisal and Competence Review

The Council will review employee performance, competence and development through:

- Probation reviews.
- Regular one-to-one meetings.
- Annual appraisal discussions.

- Qualification and development reviews.
- Competence assessments.

Formal competence assessments will normally be completed through the annual appraisal process and may take place more frequently where required.

Competence may be assessed using:

- Qualifications and mandatory training records.
- CPD activity.
- Appraisal outcomes.
- Professional discussions.
- Observed practice.
- Quality assurance findings.
- Service performance information.
- Resident feedback.
- Complaint and satisfaction information.
- Case audits, supervision records, learning records and training outcomes.

Competence assessments will be based on a balanced review of all relevant evidence. Complaints, resident dissatisfaction or satisfaction data may highlight potential learning or service issues but will not be considered on their own. They will be reviewed alongside other evidence, including performance information, case audits, supervision records, training outcomes and quality assurance findings.

The Council will use themes arising from resident feedback, complaints, compliments, satisfaction information, communication and responsiveness performance against service standards, quality assurance findings, service reviews and other assurance activities to identify learning needs, development priorities and areas where additional support may be required.

Where skills gaps are identified, managers will agree appropriate development plans using the Learning Zone Performance System and monitor progress.

7. Managing Performance and Qualification Concerns

The Council is committed to addressing capability and performance concerns promptly, fairly and consistently.

Where concerns arise, managers will:

- Discuss concerns with the employee at the earliest opportunity.
- Explore any underlying causes with the employee.
- Review learning and support needs.
- Provide appropriate support.
- Agree improvement actions and review arrangements.
- Monitor progress and outcomes.

Managers must ensure that any support, development action, escalation or formal action is considered and applied fairly, consistently and in accordance with the

Equality Act 2010. This includes considering whether the employee may have a disability or other protected characteristic, whether reasonable adjustments are required, and whether any action could have an unjustified adverse impact because of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.

Where sufficient improvement is not achieved, matters may be managed through the Council's relevant procedures.

If performance concerns arise with agency workers, discussions will be had with the worker in conjunction with the employment agency.

Capability and Conduct

The Council will distinguish between:

Capability Issues

Where an employee is unable to meet required standards despite genuine effort, engagement and support.

This includes employees who actively engage with mandatory qualifications but experience difficulties such as learning needs, health conditions or repeated assessment failure despite reasonable effort.

Conduct Issues

Where an employee knowingly fails to comply with requirements, including refusal to:

- Undertake mandatory qualifications.
- Attend learning activities.
- Complete assessments.
- Follow agreed improvement plans.
- Adhere to reasonable management instructions

Capability concerns will normally be managed through supportive development and the Capability Policy. Conduct concerns may be managed through the Disciplinary Policy.

Detailed arrangements are contained within the Qualification Support and Escalation Procedure.

8. Roles and Responsibilities

Employees

Employees must:

- Sign and comply with a Learning Support Agreement before enrolment on a Council-supported professional qualification, where required.

- Maintain professional competence
- Participate in learning and development
- Engage with required qualifications and training
- Apply learning within their role
- Discuss development needs with their manager

Managers

Managers must:

- Assess competence requirements
- Support employee development
- Monitor learning and qualification progress
- Complete competence reviews
- Address competence concerns promptly
- Maintain appropriate records
- Escalate significant competence risks where necessary
- Keep up to date with relevant housing legislation and changes
- Continual professional development in terms of people management and leadership participating in the Council's Performance Management training and other relevant training.

Housing Senior Management Team

The Housing Senior Management Team is responsible for:

- Strategic oversight
- Monitoring compliance
- Reviewing and monitoring capability across the directorate
- Ensuring appropriate resources are available
- Receiving assurance regarding workforce competence
- Approving and reviewing the Housing Competence and Conduct Standard Framework and associated role-to-qualification mapping

Failure to comply with this policy may be managed through Capability or Disciplinary policies where appropriate.

Human Resources / Learning and Development

Human Resources / Learning and Development Team is responsible for:

- Supporting policy implementation
- Maintaining learning systems and records
- Providing professional advice on capability and disciplinary processes
- Monitoring and reporting on mandatory e-learning compliance

9. Monitoring and Assurance

Managers will monitor:

- Qualification enrolment and completion
- Mandatory training compliance
- Competence assessment outcomes
- CPD activity
- Capability and Disciplinary cases
- Workforce competence risks
- Performance against relevant service standards
- Themes arising from resident feedback, complaints and quality assurance activity

Housing Senior Management Team will oversee the consistent application of competence and conduct requirements across Housing Services. This will include periodic review of assessment approaches, support arrangements and identified development actions to reduce unjustified differences between teams, roles or levels of seniority.

Monitoring information relating to protected characteristics will be reviewed, where available and appropriate, to assess whether competence, learning or qualification requirements are creating unintended adverse impacts. Any identified concerns will inform appropriate support, reasonable adjustments and improvements to the policy's implementation

Where housing services are delivered by contractors or third-party providers, the Council will seek assurance that individuals delivering services are competent and appropriately qualified.

Contract managers will obtain, review and retain evidence at regular intervals to confirm that contractors maintain appropriate competence, qualifications, training, supervision arrangements, competence records and conduct standards. This evidence should demonstrate that individuals delivering housing services on behalf of the Council meet relevant safety, professional and regulatory requirements. Where concerns arise regarding contractor competence or conduct, these will be addressed through appropriate contract management and contractual arrangements.

Reports will be provided through governance arrangements, including HRA Subgroups, HRA Operations Group and Cabinet Member, to provide assurance regarding compliance with the Housing Competence and Conduct Standard.

Competence risks may include qualification non-compliance, mandatory training non-compliance, skills shortages, succession risks, recruitment challenges or other issues that could impact the Council's ability to maintain a competent workforce.

The Council will:

- Monitor legislative, regulatory and professional developments.
- Review resident feedback, complaints, compliments, satisfaction information, service performance data and relevant learning from Housing Ombudsman findings when assessing workforce competence and identifying development priorities.

- Use competence information to support workforce planning and succession planning.
- Maintain records in accordance with information governance requirements.

10. Policy Review and Related Documents

This policy will be reviewed annually, or sooner where required due to legislative, regulatory or organisational change. Recognised trade unions will be consulted as part of any substantive review or proposed material change to the policy. Residents Services (Housing) is responsible for maintaining and reviewing the policy.

Supporting Documents

- Housing Competence and Conduct Standard
- Housing Competence and Conduct Standard Framework
- Learning Support Agreement

Governance			
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