HR015 Competence and Conduct Policy

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Data Impact Assessment Required / Completed	Not required as the policy does not involve any notable changes to the way in which Cottsway process personal data.
Reviewed By (Relevant Group)	Corporate Leadership Team / Staff Matters
Approved by	Directors

1. Policy Statement

1.1 Cottsway is committed to ensuring that all staff and relevant contractors:

- possess the knowledge, skills / experience, and behaviours required for their roles
- Receive regular, role-appropriate training
- Demonstrate professional, respectful, and customer-centred conduct
- Understand and uphold the organisation's values and regulatory responsibilities
- Are supported to maintain and improve competence throughout their employment

1.2 We will maintain robust systems to record, monitor, and evidence competence and conduct.

2. Policy Scope

2.1 All employees, including permanent, temporary, and agency staff

2.2 Any Contractors and subcontractors delivering housing services on behalf of Cottsway.

3. Regulatory and legal considerations

3.1 Competence and Conduct Standard (2026)

3.2 Social Housing (Regulation) Act 2023

4. Strategic Objectives

Our objectives are aligned to the requirements of the Competence and Conduct Standard (the Standard), summarised as follows:

4.1 Build and maintain a competent workforce

- Ensure all staff have the knowledge, skills and experience, and behaviours needed to perform safely and effectively
- Maintain a competence framework for staff delivering social housing services

4.2 Meet Mandated Qualification Requirements

- Roles identified in scope of the qualification requirement
- Ensure relevant staff hold, or are supported to achieve, the required housing management qualification(s)
- Verify and record relevant qualifications and equivalence assessments

4.3 Embed a Culture of Professional Conduct

- Promote adherence to the Code of Conduct aligned with regulatory expectations
- Ensure all staff demonstrate respectful, empathetic, safety-first behaviours
- Address poor conduct promptly and consistently

4.4 Support Continuous Learning and Development

- Provide access to training and professional development opportunities
- Use Performance Development Reviews to identify learning needs and career pathways
- Encourage reflective practice and learning from complaints, incidents, and customer feedback

4.5 Ensure Contractor and Supplier Compliance

- Require contractors delivering housing management services on behalf of Cottsway to meet the Standard.
- Obtain assurance that contractor staff possess the appropriate knowledge, skills, experience and behaviours to deliver services safely and professionally.
- Monitor contractor compliance through procurement, contract management, customer feedback, performance reviews and audit activity.

4.6 Embed Customer Influence and Transparency

- Provide customers with meaningful opportunities to shape, review and scrutinise the Competence and Conduct Policy and Code of Professional Behaviours through consultation, engagement and scrutiny activities.
- Use customer feedback, scrutiny activities, complaints, compliments and satisfaction measures to inform training needs, competence requirements and service improvements.

- Publish relevant competence and conduct information in accessible formats and use a range of engagement channels to ensure customers can influence and scrutinise service standards.

5. Policy Details

5.1 This policy sets out how Cottsway ensures that all employees, and contractors involved in delivering housing services, are competent, appropriately trained, and conduct themselves professionally in line with the Standard.

5.2 The aim is to guarantee high-quality, safe, respectful services for customers and to comply with regulatory requirements.

Competence

Qualifications

Definition: the combination of skills, knowledge, experience, and behaviours required to perform a role safely and effectively.

5.3 To comply with the Standard, Cottsway must ensure that all relevant persons within scope of the qualification requirement either hold or are working towards a recognised housing management qualification.

5.4 The roles that fall within this requirement are as follows:

Relevant Person	Qualification Level	Role in Cottsway
Senior Housing Executive	Level 5	Deputy CEO
Senior Housing Manager	Level 4	Head of Assets
		Head of Housing
		Head of Property Services

5.5 Cottsway will ensure that newly appointed staff in these roles either hold the required qualification at the point of appointment or are supported to achieve it within an agreed timeframe (in line with the requirements of the Standard).

5.6 Cottsway will review existing postholders to confirm that they hold the required qualification or can demonstrate an equivalent level of knowledge, skills, and experience.

5.7 Where a staff member does not hold the mandated qualification, the organisation may:

- Recognise equivalent qualifications
- Assess competence through experience, training, or accredited learning
- Agree a development plan to achieve the required qualification within a reasonable timeframe

5.8 All mandated qualifications will be verified through original certificates, with a copy held on the employee's file.

5.9 Staff are responsible for ensuring that their qualifications remain current and valid.

5.10 Where a qualification has expired or is no longer valid, the staff member will be immediately restricted from undertaking duties that require it. A remedial plan will be agreed, including timescales for renewal. Additional supervision may be required during this period.

5.11 Where qualifications require ongoing Continuing Professional Development (CPD), staff must complete the required hours or modules within the specified timeframe.

5.12 It is the responsibility of the post holder to provide clear evidence of how they meet the required equivalent knowledge, skills, and experience where a formal qualification as prescribed within the Standard is not held.

5.13 Cottsway will provide reasonable support for re-accreditation, including training time and access to CPD, in line with the Training and Development Policy.

5.14 Frontline staff without mandated qualification requirements are expected to meet the competence standards. Where gaps are identified, development plans, training, and supervision will be provided to support achievement of competence.

5.15 Contractors delivering services on behalf of Cottsway must demonstrate that their staff possess the knowledge, skills, experience and behaviours necessary to deliver services safely and professionally. Mandatory housing management qualification requirements will apply only where required by the Competence and Conduct Standard or other regulatory requirements.

<u>Recruitment and selection</u>

5.16 Recruitment and selection will be based on a process that is designed to assess candidate's behaviours, knowledge, skills and experience.

5.17 This process is detailed in the organisation's resourcing policy.

<u>Induction and probation</u>

5.18 Staff induction is a supportive and inclusive induction process that:

- Helps staff understand their role and responsibilities
- Promotes health, safety and wellbeing
- Introduces organisational culture, values, behaviours and expectations
- Enables staff to build key skills and experience in their role
- Ensures compliance with statutory and mandatory requirements

5.19 Cottsway will ensure that all staff undertake a comprehensive induction process which will ensure that staff acquire the knowledge, skills and behaviours required for their roles.

5.20 Managers will assess competence as the staff member progresses through induction and probation, in line with the organisation's performance management policy.

Maintenance of Competence

5.21 Staff will be assessed on their competence as part of the Performance and Development Review (PDR) process.

5.22 Cottsway will support staff that require CPD training for specialist roles to maintain up to date professional competence, as agreed through the PDR process.

5.23 Where competence gaps are identified:

- A development plan will be created to address the specific areas for improvement, with the performance management policy being followed for any areas that need to be addressed more formally
- Additional training or supervision will be provided to support capability building
- Serious or repeated issues may lead to disciplinary action in line with organisational policy

5.24 In addition to the mandated qualification requirements, Cottsway encourages and supports staff to undertake relevant professional qualifications and accredited learning where these will enhance competence, support career development, strengthen organisational capability or contribute to succession planning.

5.25 Requests to undertake qualifications or accredited learning will be considered through the PDR process and supported subject to organisational need, service priorities and resource availability.

Conduct

Definition: the professional behaviours and standards expected of staff when interacting with customers, colleagues, and partner organisations.

5.26 Cottsway expects all employees to demonstrate the highest standards of ethical behaviour, professionalism, and integrity when carrying out their duties and representing the organisation.

5.27 These expectations are set out in:

- the job descriptions used during recruitment and performance management (which includes job purpose, accountability and the person specification, summarising the values, behaviours, skills, knowledge and experience required)

- the Code of Conduct for Employees, which includes the Code of Professional Behaviours. This is covered during induction and remains accessible to staff via Jostle

5.28 Employees are required to adhere to these standards and will be asked to confirm their understanding of the Code of Conduct for Employees as part of the PDR process.

Contractors

Contractors and suppliers are expected to demonstrate the same standards of professionalism, respect, customer care and conduct that Cottsway expects of its own employees.

5.29 Cottsway will adopt a proportionate approach to contractor competence and conduct requirements, based on the nature, scale and customer impact of the services being delivered.

Contractors delivering housing services on behalf of Cottsway:

5.30 Contractors delivering housing services on behalf of Cottsway, or undertaking activities that involve regular contact with customers, decision-making affecting customers, or significant service delivery responsibilities, will be required to demonstrate that their staff possess the knowledge, skills, experience and behaviours necessary to undertake their roles safely, professionally and in a manner consistent with Cottsway's expectations, including the standards set out within Cottsway's Code of Professional Behaviours and Code of Conduct for Suppliers and Contractors.

5.31 These contractors may be required to provide evidence of competence, training, qualifications, operational procedures and professional standards, as requested by Cottsway.

5.32 Compliance will be monitored through procurement processes, contract management arrangements, customer feedback, complaints, compliments, service performance reviews, audits and other assurance activities. Customer experience and behavioural standards will form part of Cottsway's assessment of contractor performance.

Other Contractors and Suppliers:

5.33 Contractors and suppliers whose work does not involve significant housing service delivery responsibilities will be expected to comply with Cottsway's Code of Conduct for Suppliers and Contractors when undertaking work on behalf of the organisation.

5.34 The Code of Conduct for Suppliers and Contractors will set out Cottsway's expectations regarding professional behaviour, customer care, equality, diversity and inclusion, health and safety, safeguarding, modern slavery, confidentiality, respect for customers and their homes, and any other standards considered appropriate to the services being provided.

5.35 Cottsway will provide contractors and suppliers with the Code of Conduct for Suppliers and Contractors at the point of engagement and may seek assurance that the requirements have been communicated to relevant staff.

5.36 Where concerns regarding competence, conduct or customer experience are identified, contractors and suppliers will be required to implement appropriate corrective actions. Cottsway may require evidence that improvements have been made and will monitor ongoing performance through its contract management arrangements.

5.37 Persistent or serious failures to meet required standards may result in formal contract management action, escalation to senior management within the contractor organisation, the removal of individuals from providing services on Cottsway's behalf, or other contractual remedies as appropriate.

Performance Management Framework

5.38 Cottsway is committed to maintaining a high performing workforce that delivers safe, high quality, customer centred services. Performance management ensures that all staff consistently meet the competence and conduct expectations set out in this policy.

5.39 Performance management is a continuous process that supports staff to develop, identifies areas for improvement and ensures accountability where standards are not met.

5.40 Cottsway's approach to performance management is set out in the Performance Management Policy.

Customer Influence and Review

5.41 Cottsway is committed to ensuring that customers have meaningful opportunities to influence how services are delivered and to shape the competence and conduct expectations of staff.

5.42 Customer insight is a core component of the Competence & Conduct Standard, which requires providers to understand the customer experience and use it to improve staff capability, behaviour, and service quality.

5.43 Our approach to customer influence is based on the following principles:

- Customer voice is central to understanding whether staff are competent and behave professionally.
- Feedback is valued and acted upon – not simply collected
- Customers influence service design, policy development and performance monitoring
- Engagement is inclusive, accessible and aims to be representative of our communities
- Learning from customer feedback drives improvement in service delivery.

5.44 Mechanisms for customer influence on staff competence and conduct is via a range of channels, including:

- Routine Feedback, such as post-interaction surveys, quarterly Tenant Satisfaction Measures, complaints and compliments, and follow up calls to customer services.
- Formal Engagement, such as customer panels and forums, scrutiny group, focus groups.
- Targeted Insight, such as feedback from vulnerable customers or their representatives, thematic reviews (e.g., anti-social behaviour, repairs, damp and mould)
- Learning from serious incidents or service failures.
- Relevant competence and conduct information will be published in accessible formats in accordance with Cottsway's approach to transparency and accountability.

All feedback channels are accessible, inclusive and available in multiple formats.

Conflicts of Interest

5.45 Cottsway is committed to ensuring that all decisions, actions, and behaviours of employees, managers, Board members, and contractors are free from actual, potential, or perceived conflicts of interest.

5.46 Maintaining integrity, impartiality, and transparency is essential to delivering safe, fair, and customer-centred services, as required by the Standard.

5.47 Examples of conflicts of interest and Cottsway's approach is set out in the Declaration of Interest Policy.

5.48 Contractors must provide equivalent declarations for all relevant staff working on behalf of Cottsway.

6 Monitoring and Reporting

6.1 Records will be maintained, in line with data protection requirements, for training, qualifications, performance, conduct concerns and resolutions and contractor compliance.

6.2 An annual Competence and Conduct Assurance Report will be provided to the Board, setting out the organisation's compliance with the Standard, areas of good practice, any identified compliance gaps, and actions required to support continuous improvement.

6.3 Compliance with the Standard will be subject to independent assurance through the organisation's Internal Audit Plan. Periodic audits will be commissioned from the organisation's internal audit provider to review the effectiveness of controls, governance arrangements, compliance with policy requirements, and the adequacy of evidence supporting competence and conduct assurance.

6.4 Audit findings, recommendations and management actions will be reported through the organisation's governance framework, with progress monitored until all actions are completed.

7 Equality, Diversity and Inclusion

7.1 Cottsway are committed to embedding the principles of equality and diversity in everything we do, and this includes ensuring that any grievances are managed in line with our Equality, Diversity and Inclusion policy.

7.2 Competence assessments, qualifications, development opportunities and performance reviews will be applied fairly and consistently, with reasonable adjustments considered where required.

7.3 We have completed an Equality Impact Assessment for this policy.

8 Associated Documents, Policies and Procedures

8.1 Code of Conduct for Employees, including the Code of Professional Behaviours (4P's behaviour framework)

8.2 Learning and Development Policy

8.3 Performance Management Policy

8.4 Declaration of Interest Policy

9 Review

9.1 A full review of this policy will be carried out annually (initially), or sooner to reflect any regulatory changes.

9.2 Once the policy is embedded, the review period will be assessed, potentially reverting to 3 yearly as per policy standard.

List of changes to policy

May 2026	New Policy