



Competence and Conduct Policy

**Effective from:
1 October 2026**

KEY POINTS FROM THIS POLICY

KEY POINT	WHAT YOU NEED TO KNOW	SEE
Who the Policy applies to	The Policy applies to staff and others whose roles deliver or materially influence the quality, safety, compliance or resident experience of Housing Management Services. Relevant requirements also apply to contractors and service providers.	Section 2
Professional standards	Everyone in scope is expected to demonstrate professionalism, integrity, respect, inclusion, accountability, appropriate professional boundaries and a commitment to putting residents first.	Section 3
Competence and qualifications	Relevant Staff must have, or be supported to develop, the skills, knowledge, experience and behaviours needed for their roles. Relevant Senior Housing Managers and Senior Housing Executives must meet the applicable qualification requirements.	Sections 4 & 5
Learning, development and performance	Staff will receive appropriate induction, training, development and support. Competence, conduct and performance will be discussed through regular one-to-ones and formal performance reviews, with action taken where required standards are not met.	Sections 6–8
Resident involvement	Residents will have meaningful opportunities to influence and scrutinise the Policy and Code of Conduct. Resident feedback, complaints, compliments and scrutiny will inform learning and future reviews.	Section 9
Accountability and assurance	Managers and staff have responsibilities for maintaining competence and professional standards. Compliance will be monitored through performance, resident feedback, audits, qualification and training records and service-provider monitoring, with reporting to the Executive Team and People and Governance Committee.	Sections 10–12

Introduction

This policy has been implemented to meet the requirements of the Competence and Conduct Standard. It should be read alongside YMCA SPG's Code of Conduct and relevant People and Culture, Housing, Safeguarding, Health and Safety, Data Protection, Complaints and Equality policies, in addition to the related policies and documents set out below.

It does not replace those policies but sets out how competence and conduct expectations apply to colleagues working in, or influencing, Housing Management Services.

Related Policies and documents:

- ▶ Code of Conduct
- ▶ Induction and Probation Policy
- ▶ Safeguarding Policy
- ▶ Safeguarding Policy/ Procedure for contractors
- ▶ DBS
- ▶ Equality, Diversity and Inclusion Policy

- ▶ Learning and Development Policy
- ▶ Data Protection Policy/ GDPR guidance
- ▶ Complaints Policy
- ▶ Disciplinary and Grievance Policy
- ▶ Performance Improvement Policy
- ▶ Resident Involvement Strategy
- ▶ Customer Involvement, Engagement and Empowerment Charter
- ▶ Whistleblowing Policy
- ▶ Procurement/ Contract Management Policy (Management Agreements)
- ▶ Recruitment Policy
- ▶ YMCA SPG Behavioural Competency Framework

Glossary of terms

- **The Act** means the Housing and Regeneration Act 2008 (as amended and updated by the Social Housing (Regulation) Act 2023);
- **Competence and Conduct Standard** means the regulatory consumer standard set by the Regulator of Social Housing under section 194A of the Act requiring RPs to meet requirements relating to the competence, conduct and qualification of Relevant Staff involved in social Housing Management Services;
- **Exempt Qualifications** means functions outside the qualification requirements where the person does not otherwise have a substantive role in Housing Management Services, such as certain back-office roles, new-build construction, care and support delivery, or statutory homelessness and housing register functions;
- **Housing Management Services** means services connected with the management of social housing, including customer services, complaints, resident engagement, allocations and lettings, tenancy management, income management, anti-social behaviour, repairs and maintenance, asset management, estate management, and capital or major works in occupied buildings;
- **Level 4 Qualification** means an Ofqual-regulated level 4 qualification in housing management, unless an equivalent or higher-level qualification or other permitted route applies;
- **Level 5 Qualification** means a foundation degree or an Ofqual-regulated level 5 qualification in housing management, unless an equivalent or higher-level qualification or other permitted route applies;
- **Ofqual** means the Office of Qualifications and Examinations Regulation, which regulates qualifications, examinations and assessments in England;
- **Partially Compliant Qualification** means qualification that meets the required level or type but does not fully cover all required housing management course content. Additional training may be needed to meet the outstanding requirements.
- **RP** means a registered provider of social housing registered with the Regulator of Social Housing;
- **Relevant Person** means a senior housing manager or senior housing executive of SPG who falls within scope of the qualification requirements.

- **Relevant SP Manager** means a relevant manager of a Services Provider who falls within scope of the qualification requirements because they manage delivery of Housing Management Services to residents of YMCA SPG.
- **Relevant Staff** means staff involved in delivering or managing Housing Management Services who are expected to meet the competence and conduct requirements set out in this policy;
- **Relevant Qualification** means a housing management qualification that meets the required level, type and course content requirements for the person's role;
- **Services Provider** means an organisation or a person that provides, or arranges the provision of, Housing Management Services on behalf of YMCA SPG;
- **Senior Housing Manager** a person with senior operational management responsibility for Housing Management Services, such as managing the delivery, quality or safety of services to residents;
- **Senior Housing Executive** means a person in senior management with strategic responsibility or accountability for the day-to-day management of Housing Management Services;
- **Transition Period** means 36 months after the Competence and Conduct Standard comes into force during which Relevant Staff must obtain, or be working towards, the Relevant Qualification;
- **YMCA SPG** means YMCA St Paul's Group.

1. Purpose

This policy, together with the Code of Conduct sets out how YMCA SPG will make sure that staff involved in delivering Housing Management Services have the right skills, knowledge, experience and behaviours to provide good quality, respectful and resident-focused services. This policy supports compliance with the Regulator of Social Housing's Competence and Conduct Standard, which requires RPs to have clear arrangements for staff competence, conduct, learning and development, performance management, and resident involvement. It also sets out how YMCA SPG will comply with the qualification requirements for Senior Housing Managers, Senior Housing Executives and Relevant SP Managers under the Competence and Conduct Standard.

2. Scope

This policy applies to all employees, workers, agency workers, interim staff, apprentices and volunteers where their role delivers or materially influences the quality, safety, compliance or resident experience of Housing Management Services on behalf of YMCA SPG.

This policy also applies, where relevant, to staff of contractors, managing agents and service providers delivering Housing Management Services on behalf of YMCA SPG.

The qualification requirements apply specifically to Senior Housing Managers and Senior Housing Executives who have a substantive role in managing the delivery of Housing Management Services to residents, are not unpaid volunteers, have been in role for more than 12 months, and are not otherwise exempt.

They also apply, through appropriate contractual and monitoring arrangements, to Relevant SP Managers who provide comprehensive social Housing Management Services. Housing Management Services covers services delivered to residents in relation to the occupation, management, maintenance, safety and improvement of homes, buildings and neighbourhoods.

This includes but is not limited to:

- ▶ Customer services
- ▶ Complaints
- ▶ Resident involvement and engagement
- ▶ Allocations and lettings
- ▶ Tenancy and licence management
- ▶ Income management
- ▶ Anti-social behaviour
- ▶ Repairs and maintenance
- ▶ Asset management, including building and fire safety
- ▶ Estate management
- ▶ Capital or major works in occupied buildings

This policy covers competence, learning and development, conduct, appraisal, performance management, qualification requirements, tenant involvement, service provider assurance and monitoring arrangements.

3. Professional Standards and Culture

3.1 Our Commitment to Professionalism

YMCA SPG is committed to providing high-quality housing services delivered with professionalism, compassion and integrity. We are embedding a Psychologically Informed Environment, placing compassion at the heart of everything we do.

Guided by our Christian ethos and values, we deliver services rooted in empathy, respect, inclusion and understanding. We recognise the impact that life experiences and trauma can have on individuals and strive to create environments where customers and colleagues feel safe, listened to, valued and able to thrive.

We believe professionalism is demonstrated not only through competence and compliance, but through the way we treat people, make decisions, listen to customers and uphold our values every day. Our Customer Involvement, Engagement and Empowerment Charter reinforces our commitment to ensuring that the customer voice helps shape, influence and improve our services.

Through this policy, YMCA SPG commits to:

- ✓ Treating residents with dignity, fairness and respect.
- ✓ Listening to residents and responding to their concerns.
- ✓ Providing meaningful opportunities for residents to influence and scrutinise services.



- ✓ Supporting staff to develop and maintain the skills, knowledge, experience and behaviours needed for their roles.
- ✓ Meeting regulatory qualification requirements.
- ✓ Addressing poor performance or conduct fairly and promptly.

3.2 Principles of Professional Behaviour

Professionalism at YMCA SPG means:

1. Acting with Integrity
2. Putting Customers First
3. Maintaining Professional Competence
4. Demonstrating Respect and Inclusion
5. Taking Responsibility/ Leadership
6. Safeguarding and Maintaining Professional Boundaries
7. Working Collaboratively

Please find more detailed information on their meanings in Appendix 1

3.3 YMCA SPG Values in Practice

All staff are expected to demonstrate behaviours that reflect our values, contribute to positive outcomes for residents and colleagues, model empathy and compassion and build trust in our services.

Our approach to professionalism is rooted in our five organisational values:

Loving

We expect to be generous with our kindness, compassion and respect, treating others as we would like to be treated ourselves.

(Love God, love your neighbour as yourself Matt 22:37)

Community focused

We value all people, of faith and none and welcome all by celebrating diversity and challenging inequality. Within our internal teams, service users and other community collaborators we recognise the best solutions are co-created.

(Philip & the Ethiopian Eunuch Acts 8:26-40)

Holistic

We understand that everyone has the potential for wholeness in body, mind and spirit. We acknowledge where brokenness and hurt have damaged this fullness of life and commit to encouraging and empowering others to grow.

(Paralytic man healed Luke 5:18-25)

Hopeful

We know that everyone is unique, and we want to resource and equip people so that they can hope for a better future and make the best decisions.

(Woman at the well John 4:4-26)

Person centred

We place relationship at the heart of all we do, knowing that we grow better together. We will consider the thinking, emotions, personality and situation of each individual and we will draw out and support resilience, learning and transformative personal development.

(Zacchaeus Luke 19:1-10)

3.4 Code of Conduct

YMCA SPG has adopted and maintains a Code of Conduct (the **Code**) for all staff. The Code sets out the behaviours expected when working with residents, service users, colleagues, partners and the wider community.

The Code includes expectations around:

- ▶ Respect, dignity and fairness
- ▶ Listening to Resident and taking concerns seriously
- ▶ Professional communication
- ▶ Equality, Diversity and Inclusion
- ▶ Honesty, integrity and accountability
- ▶ Confidentiality and data protection
- ▶ Appropriate use of power and authority
- ▶ Acting in line with policies and legal duties
- ▶ Raising concerns where standards are not being met

The Code is accessible to staff and residents and will be reviewed regularly to make sure it remains up to date and fit for purpose. Please find the Code of conduct [here](#).

Conduct concerns will be managed in accordance with relevant HR, disciplinary, grievance, safeguarding and whistleblowing procedures.

3.5 Fostering a Culture of Professionalism

All staff are expected to demonstrate the behaviours set out within the Code and the YMCA SPG Behavioural Competency Framework. Through our values and YMCA SPG Behavioural Competency Framework, we aim to foster a culture where residents feel respected, listened to and valued, and where colleagues are supported to deliver excellent services consistently. This aligns with the requirements of the Competence and Conduct Standard, which seeks to ensure staff demonstrate the skills, knowledge, experience and behaviours needed to deliver high-quality services and positive resident outcomes.

4. Competence Requirements

All Relevant Staff must have, or be supported to develop, the competence needed for their role. This includes:

- ▶ technical knowledge relevant to their area of work
- ▶ understanding of housing law, regulation, policies and procedures where relevant
- ▶ customer service and communication skills
- ▶ understanding of equality, diversity and inclusion
- ▶ ability to work respectfully with residents including those with additional needs or vulnerabilities
- ▶ awareness of safeguarding, health and safety, and building safety responsibilities where relevant



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- ▶ ability to manage complaints, concerns and feedback appropriately
- ▶ good judgement and professional behaviour

Line Managers are responsible for making sure staff understand their role, receive appropriate training, and are supported to meet the competence and conduct requirements and the expected standards.

They are also responsible for challenging poor conduct and poor performance of staff appropriately.

5. Qualification requirements

The Government's policy statement sets out that Relevant Staff in scope must hold, or be working towards, a Relevant Qualification during the Transitions Period. At the end of the

Transition Period those in scope must be qualified or working towards the Relevant Qualification within 12 months of starting once they have passed their probation period. Senior Housing Managers must hold, or be working towards, a relevant Level 4 Qualification. Senior Housing Executives must hold, or be working towards, a relevant Level 5 Qualification or foundation degree. YMCA SPG will identify any roles that fall within the definitions of Senior Housing Manager or Senior Housing Executive. Some examples of roles in scope at YMCA SPG can be found in **Appendix 2** of this policy.

A person may be treated as holding or working towards a Relevant Qualification where they hold, or are working towards, an equivalent or higher-level qualification or apprenticeship that satisfies the applicable course content requirements. Where a qualification is partially compliant, YMCA SPG will assess whether additional training modules are required to meet the unmet course content requirements.

During the Transition Period, YMCA SPG will identify all roles in scope, assess existing qualifications, agree qualification or training plans, monitor progress and maintain evidence of compliance.

Those enrolled on a course will be required to complete a training costs agreement. This reflects YMCA SPG's investment; as colleagues will complete lessons within working hours. As there are no exams required, further study time off will not be allocated.

YMCA SPG will keep a record of roles assessed as in scope, qualification status, enrolment, progress and completion.

The qualification record will include:

- ✓ the required qualification
- ✓ enrolment date
- ✓ training provider
- ✓ expected completion date
- ✓ actual achievement date
- ✓ renewal or expiry date where relevant, and CPD evidence

Managers will review qualification progress through supervision and performance reviews.



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Failure to enrol, make sufficient progress or complete within the required timeframe may be managed under the relevant performance process. Managers must consider reasonable adjustments, individual circumstances and any barriers to completion before formal action is taken. Reasonable adjustments and extended absences will be managed fairly and in accordance with applicable equality and employment obligations.

5.1 Recruitment and Qualification Expectations

Job descriptions for roles in scope will state the Relevant Qualification requirements where applicable. Where someone is appointed without the Relevant Qualification, they must enrol and begin working towards it within the required timescale (12 months) and complete it within the Transition Period.

6. Learning and Development

YMCA SPG will maintain a clear approach to learning and development for Relevant Staff. Full details are outlined in the Learning and Development Policy.

The approach will include:

- ▶ A structured induction linked to their role including areas such as Professionalism and the Code of Conduct, Safeguarding, Health and Safety, Data Protection, Equity Diversity and Inclusion, Complaints handling and whistleblowing.
- ▶ There will be a probationary period for new starters during which they will be assessed against the required skills and behaviours for the role.
- ▶ Relevant Staff in scope needing Level 4 and Level 5 or equivalent qualifications will need to be enrolled within 12 months of starting in role.
- ▶ Support for staff working towards relevant qualifications
- ▶ Mandatory training linked to role, risk and regulation
- ▶ Role-specific training and refreshers
- ▶ Access to continuing professional development
- ▶ Management and leadership development where appropriate
- ▶ Regular one-to-one supervision meetings at least monthly

Learning needs will be identified through induction, probation, supervision, performance reviews, service reviews, resident feedback, complaints, incidents, audit findings, legal and regulatory changes. Learning may include formal qualifications, internal courses, external training, coaching, mentoring, shadowing, reflective practice and professional body resources.

Training records will be maintained and will be reviewed regularly to monitor completion, gaps and compliance. Staff and their line managers are accountable for the follow up and completion of required training.

7. Performance and Development Reviews

All Relevant Staff will have regular opportunities to discuss their performance, conduct and development.

This will include:

- ▶ Clear objectives linked to role and service expectations
- ▶ Regular one-to-one meetings at least monthly.
- ▶ Formal Performance Reviews carried out twice yearly



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- ▶ Objectives on key areas for performance to include service delivery, resident experience, compliance and safety
- ▶ Discussion of learning needs and a personal development plan
- ▶ Review of behaviours and conduct, not just tasks completed
- ▶ Consideration of Resident feedback, complaints or compliments where relevant.

Managers must make sure performance conversations are fair, evidence-based and recorded appropriately.

8. Managing Performance and Conduct Concerns

8.1 Managing Performance

Where a member of staff does not meet expected standards of competence or conduct, managers must act promptly and fairly.

This may include:

- ▶ Informal guidance, coaching or supervision
- ▶ Additional training or mentoring
- ▶ Review of workload, role clarity or support needs
- ▶ Formal action under the Performance Improvement policy which will include a performance improvement plan. This includes those who are not progressing with the required qualifications.

8.2 Conduct Concerns

Standards of professional behaviour are outlined in the Code of Conduct. Some examples of poor conduct may include disrespectful communication, failure to listen to residents, dismissing concerns, discrimination, failure to follow policy, or behaviour that damages trust in the organisation.

Concerns involving safeguarding, health and safety, serious misconduct or discrimination must be escalated immediately through the relevant policy.

9. Resident influence and scrutiny

Residents will be given meaningful opportunities to influence and scrutinise this policy and the Code of Conduct. Residents will continue to be offered opportunities to review how the policy and Code of Conduct are working in practice.

This may include:

- ▶ Consultation and engagement with residents and resident groups
- ▶ Feedback through surveys or resident meetings
- ▶ Review by resident panels or scrutiny groups
- ▶ Learning from complaints and compliments

Through the above, we will involve residents in reviewing whether the policy is accessible and understandable and how this policy will benefit them or play out in the day-to-day service that they are offered.

Feedback from residents will be used to identify learning, improve staff practice and inform future reviews.



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Feedback from residents will be considered when this policy and the Code of Conduct are reviewed.

This policy and the Code of Conduct will be made available to residents in accessible formats where required, including plain language summaries, easy read, translated versions or printed copies on request and other formats where needed.

Internal People and Culture policies that are not published externally will be explained in accessible terms where they affect resident-facing standards.

10. Contractors and Service Providers

Where YMCA SPG uses service providers to deliver Housing Management Services, it will take reasonable steps to ensure they meet the required standards of competence and conduct.

This may include:

- ▶ Monitoring performance through contractor meetings, complaints, resident feedback, audits and service data;
- ▶ Bringing the Competence and Conduct Standard and qualification requirements to the attention of Service Providers and requiring evidence of compliance;
- ▶ Completion of the contractor onboarding process, including familiarisation with safeguarding requirements and the Competence and Conduct Standard
- ▶ Requiring improvement action where standards are not met, including sanctions or contract termination where appropriate;
- ▶ Procurement checks on competence, accreditation, qualifications, health and safety systems, training and information security where relevant;
- ▶ Contract clauses requiring role-specific competence, CPD and conduct aligned with YMCA SPG standards;
- ▶ Requiring evidence of training completion, qualifications, incident learning and near-miss learning where appropriate.

11. Roles and Responsibilities

Board: Provides oversight of compliance with this policy and assurance that the organisation is meeting the Competence and Conduct Standard.

Executive and senior leaders: Ensure the policy is implemented and embedded across Housing Management Services and that YMCA has effective systems, resources and culture to support competent and professional services

Managers: Identify role-specific competence requirements, support staff development, conduct appraisals and address poor performance and conduct.

People and Culture team: Supports learning, development, performance reviews, performance management, workforce records/training records and relevant policy review.



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Relevant Staff: Take responsibility for their conduct, learning, professional standards and raising concerns where needed. Maintain appropriate skills, knowledge, experience and behaviours and engage with the Performance Review process.

Service Providers/ Contractors: Ensure their staff meet expected competence and conduct standards where delivering services on behalf of YMCA SPG. Ensure that contracts include appropriate competence, conduct, qualification, reporting and remedy requirements.

12. Monitoring and assurance

Compliance with this policy will be monitored through:

- Performance data and KPI's;
- Complaints, compliments and resident feedback;
- Resident scrutiny and feedback;
- Audits and service reviews;
- Qualification progress and tracking for Relevant Staff;
- Training completion data;
- Performance Review and 1-2-1 records;
- Contract monitoring for service providers.

Findings will be reported through the appropriate governance routes, including monthly reporting to the Executive Team, quarterly reporting to the People and Governance Committee of the Board of Trustees, providing assurance on compliance, performance and any actions required.

Appendix 1 – Principles of Professional Behaviour

Professionalism at YMCA SPG means:

1. Acting with Integrity

- ▶ Being honest, trustworthy and accountable.
- ▶ Doing the right thing, even when it is difficult.
- ▶ Declaring and managing conflicts of interest.

2. Putting Customers First

- ▶ Treating customers with dignity and respect.
- ▶ Listening and responding to feedback.
- ▶ Promoting customer safety, wellbeing and rights.
- ▶ Staff should listen carefully, respond within a reasonable timescale, and explain what will happen next.
- ▶ Where a matter cannot be resolved straight away, staff should tell the resident when they will come back to them and, wherever possible, keep to that commitment
- ▶ Conflicts of interest - Staff must declare conflicts of interest so they can be managed properly - (Conflict of Interest means when a personal relationship, private interest or outside activity could affect, or appear to affect, a staff member's judgement or decision-making. Staff must declare this so it can be managed properly). Refer to the YMCA SPG Code of Conduct Policy on Conflicts of Interest for further information.

3. Maintaining Professional Competence

- ▶ Keeping knowledge and skills up to date.
- ▶ Taking responsibility for personal development.
- ▶ Seeking support when needed.

4. Demonstrating Respect and Inclusion

- ▶ Valuing diversity and inclusion.
- ▶ Challenging inappropriate behaviour.
- ▶ Creating an environment where people feel respected and heard.

5. Taking Responsibility/ Leadership

- ▶ Owning actions, decisions and mistakes.
- ▶ Learning from feedback and experience.
- ▶ Meeting organisational and regulatory requirements.

6. Safeguarding and Maintaining Professional Boundaries

- ▶ Building positive, appropriate relationships.
- ▶ Respecting confidentiality and privacy.
- ▶ Maintaining trust and professional judgement.



7. Working Collaboratively

- ▶ Communicating openly and appropriately.
- ▶ Supporting colleagues and teams.
- ▶ Working together to achieve positive outcomes

Appendix 2- Examples of Senior Housing Manager or Senior Housing Executive The examples of roles in scope at YMCA SPG (this list is not exhaustive and is subject to change) are:

- ▶ Director of Operations
- ▶ Head of Housing, Care & Support
- ▶ Regional Housing & Support Managers
- ▶ Housing and Support Managers/ Coordinators
- ▶ Income Coordinator
- ▶ Senior Rent and Tenancy Business Partner
- ▶ Head of Property
- ▶ Head of Assets and Programmes
- ▶ Head of Health and Safety
- ▶ Mechanical & Electrical Manager
- ▶ Senior Sustainability and Development Manager
- ▶ Property Managers
- ▶ Property Surveyors