



COMPETENCE & CONDUCT POLICY

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1. Introduction

- 1.1** This Competence & Conduct Policy sets out Eastlight Community Homes' (hereafter 'Eastlight') approach to ensuring that all employees, relevant contractors, agency workers and relevant managed services delivering housing management services to Eastlight residents have the skills, knowledge, experience and behaviours required to provide high-quality, professional and respectful services.
- 1.2** The policy supports compliance with the Regulator of Social Housing's Competence & Conduct Standard and reflects our commitment to continuous improvement, accountability and creating a positive, learning-driven organisational culture that delivers positive and measurable outcomes for residents, including safety, satisfaction and service quality.

2. Scope

- 2.1** This policy is applicable to all employees, agency workers and contractors involved in the delivery of services for Eastlight on our behalf.
- 2.2** This policy should be read alongside the related policies listed below. It does not replace these policies but brings them together to provide overarching principles for professionalism and how performance will be managed:
 - The Eastlight Code of Conduct
 - Capability Policy
 - Disciplinary Policy
 - Relationships at Work Policy
 - Health & Safety Policy
 - Data Protection Policy
 - Complaints & Resolutions Policy
 - Safeguarding Adults Policy
 - Safeguarding Children & Young People Policy
 - Probationary Guide
 - Recruitment Guide
 - Leadership Charter
 - Study Support Programme Guide.
- 2.3** This policy is not for managing matters related to attendance, capability, disciplinary, grievances or probation periods. Detailed guidance for managing these types of issues

is in the associated policy/guide stated above.

- 2.4** Eastlight's Code of Conduct sets out our expected standards of behaviour, professionalism, integrity, accountability, respect, inclusivity and resident focus. Compliance with the Code is mandatory for all employees and forms part of induction, appraisal, performance management and ongoing learning and development.
- 2.5** This policy is not contractual.

3. Statutory & Regulatory Requirements

- 3.1** This Policy is designed to ensure Eastlight meets its obligations under the following statutory and regulatory requirements:
- The Regulator of Social Housing's Competence & Conduct Standard 2026
 - The Regulator of Social Housing's Consumer Standards and Code of Practice
 - Policy Statement on Qualifications Requirements for Social Housing.

4. Aims & Objectives

- 4.1** We will ensure all individuals covered by this policy have the appropriate skills, knowledge and qualifications to deliver high-quality housing services to residents.
- 4.2** We will always promote professional, ethical and resident-focused behaviours, while embedding a culture of continuous learning and development across Eastlight that demonstrably improves resident outcomes and service delivery performance.

5. Competence Framework

- 5.1 Eastlight Employees**
- 5.1.1** Competence is defined as a combination of the right levels of skills, knowledge, experience and behaviours to carry out the work of Eastlight effectively and to achieve safe, compliant and resident-focused outcomes.
- 5.1.2** Role-specific competence requirements will be set out through job descriptions and person specifications, alongside regulatory or professional standards as applicable.
- 5.1.3** Eastlight will provide access to appropriate training, qualifications and professional development.

- 5.1.4 Line Managers and employees will identify learning and development needs through induction, supervision, regular 1-2-1s, annual appraisals and regular service reviews.
- 5.1.5 Line Managers will support employees to maintain up-to-date knowledge of legislation, regulation and best practice relevant for their roles.
- 5.1.6 Learning and development will be proportionate and tailored to roles, taking account of responsibility, risk and service impact, applying a risk-based approach with enhanced oversight for roles that have a greater impact on resident safety, compliance and outcomes.
- 5.1.7 All employees are expected to contribute to a positive, learning-focused culture and to work collaboratively to uphold high standards of professionalism across the organisation.
- 5.1.8 All employees must:
- Act professionally, ethically and respectfully at all times
 - Treat residents, colleagues and partners with dignity, fairness and respect
 - Complete required learning, refresher training and mandatory qualifications where applicable
 - Take responsibility for maintaining and developing their own knowledge, skills and behaviours and recording Continuous Professional Development (CPD)
 - Apply learning in practice and reflect on how it improves service delivery and resident outcomes
 - Follow Eastlight policies and procedures, including those relating to safeguarding, health and safety, data protection and professional boundaries
 - Raise concerns promptly where conduct, competence, safety or standards may be compromised
 - Seek advice, guidance or support where unsure, out of depth or faced with complex situations
 - Work within the limits of their role, authority and competence
 - Engage constructively with supervision, feedback and development discussions
 - Recognise the impact of their role on residents and actively contribute to improving resident outcomes.
- 5.1.9 Eastlight's Code of Conduct provides full details of expected standards and behaviours.
- 5.1.10 Where concerns about an employee's conduct or capability arise, these will be managed through the appropriate Human Resource policy, and advice should be sought from the People & Organisational Development Team.

5.2 Contractors & Agency Workers

- 5.2.1 For contractors and agency workers, assessments will be carried out during the procurement, selection and recruitment processes to ensure relevant individuals are accountable and capable to carry out their responsibilities to Eastlight standards.
- 5.2.2 Eastlight expects all contractors and agency workers to demonstrate the same high standards of professionalism, competence and conduct that we expect of our own employees. Agency workers and contractors are expected to meet the performance, conduct and behavioural standards set out in this policy and associated documents to deliver work on behalf of Eastlight.
- 5.2.3 While agency workers and contractors are not subject to our formal capability or disciplinary procedures, any concerns regarding performance, competence or conduct will be addressed promptly with the individual and their supplying agency or contracting organisation.
- 5.2.4 Where standards are not met by an agency worker or contractor, Eastlight may require immediate improvement, suspend assignments, or request removal from duties with immediate effect. Expectations will be reinforced through induction, day-to-day management and regular communication to ensure clarity and consistency.

5.3 Governance & Leadership Accountability

- 5.3.1 The Board, Executive Team and Senior Leaders are collectively responsible for ensuring compliance with the Competence & Conduct Standard. This includes:
- Ensuring appropriate skills, knowledge and experience are in place across the organisation
 - All People Managers adhering to the Eastlight Leadership Charter
 - Overseeing qualification compliance for relevant roles
 - Promoting a culture of professionalism, learning and accountability
 - Receiving and scrutinising assurance information on competence and conduct.
- 5.3.2 Board Members and Senior Leaders will maintain their own competence through ongoing development and training relevant to their governance and strategic responsibilities.

6. Qualification Pathways

6.1 Mandatory Housing Qualifications

- 6.1.1 The Competence & Conduct Standard requires registered providers to ensure that people in certain roles have the appropriate level of housing knowledge, skills and

professional judgement. Mandatory housing qualifications are an important part of meeting this requirement and support safe decision making, consistent practice and high-quality services for residents.

- 6.1.2 Mandatory housing qualifications apply only to employees in roles identified as being a ‘relevant person’ in scope of the Competence & Conduct Standard, defined as individuals delivering or managing housing management services, or supervising those who do.
- 6.1.3 In scope roles include ‘Senior Housing Managers’ and ‘Senior Housing Executives’, as defined in the Government’s Policy Statement on Qualification Requirements for Social Housing, and require a recognised housing qualification. For example, Chartered Institute of Housing (CIH) Level 4 or Level 5, or an equivalent qualification recognised by the Regulator of Social Housing.
- 6.1.4 Eastlight aligns its qualification pathways with the Chartered Institute for Housing (CIH) standards to support professional competence and regulatory compliance.
- 6.1.5 CIH Level 4 qualifications are typically for roles that deliver housing management services.
- 6.1.6 CIH Level 5 qualifications are typically for Senior Housing Managers and leaders who focus on strategic housing management.
- 6.1.7 Eastlight will support relevant colleagues to undertake CIH Level 4 or Level 5 qualifications where these are appropriate to their role.
- 6.1.8 The mandatory training framework and register of roles assessed as being in scope are maintained by the People Team and reviewed regularly.
- 6.1.9 We will ensure Senior Housing Managers and Senior Housing Executives hold or are working towards holding required levels of a CIH qualification within timescales as determined by the Regulator of Social Housing, typically within 2–3 years of appointment, subject to regulatory guidance.

6.2 Eastlight’s Approach

- 6.2.1 We have developed an assessment tool to consider whether a role is in scope for a mandatory qualification.
- 6.2.2 New or adjusted roles will be assessed to identify whether it’s in scope by the internal formal job evaluation panel.

- 6.2.3 Role assessments will normally be conducted by the Head of People & Organisational Development, with support from the formal job evaluation panel.
- 6.2.4 Managers and employees moving into an in-scope role will be expected to either hold the required qualification or be working towards it, with appropriate plans in place to support enrolment and progress, in line with the Government's definition of 'working towards'.
- 6.2.5 No payback agreements will apply for mandatory housing qualifications for roles identified as in scope.

6.3 Managing Concerns Regarding Qualification Completion

- 6.3.1 Whilst compliance with the Competence & Conduct requirements is a statutory regulation, we recognise there may be instances where completion of the qualification causes challenge.
- 6.3.2 The Line Manager, supported by the People & Organisational Development Team, will work with individuals to understand what the barriers are and explore whether appropriate adjustments can be made.
- 6.3.3 Where completion is not possible, despite support, Eastlight will need to consider if a formal process needs to be instigated, to ensure regulatory requirements are met.
- 6.3.4 Refusal to engage with a mandatory qualification without reasonable cause may result in dismissal.

6.4 Study Leave, Time & Support

- 6.4.1 Apprenticeships:
 - Employees enrolled in an apprenticeship programme will be allocated dedicated off-the-job training time in line with apprenticeship requirements. This time is built into working hours and is designed to support successful completion of the programme. Managers must ensure that apprentices are able to access and utilise this time appropriately.
- 6.4.2 Non-Apprenticeship route:
 - Reasonable time off for study may be granted where the learning is relevant to the employee's role, professional development, or organisational objectives. All requests for study leave must be agreed in advance with the employee's Line Manager
 - Approval will be subject to consideration of operational requirements and, where agreed, arrangements may include paid study leave, adjusted working hours, or flexible working patterns.

6.5 Support

- 6.5.1 Line Managers will work with employees to plan study time, assessment deadlines and appropriate workload adjustments.
- 6.5.2 Reasonable adjustments will be made where required, including for disability, health conditions, neurodiversity or caring responsibilities.

7. Performance Appraisal & Review

7.1 Eastlight Employees

- 7.1.1 All employees will participate in regular performance appraisals, have clear objectives linked to service delivery, be competent for the work required and as expected for the role, and demonstrate the behaviours and values aligned to Eastlight's purpose with clear linkage to resident outcomes, service quality and regulatory compliance.
- 7.1.2 Employees will receive constructive feedback and support to improve performance.
- 7.1.3 Performance appraisals will be supported through line management oversight, with agreed actions followed up through regular 1-2-1s and ongoing performance discussions, to help ensure that objectives, competence and conduct expectations are understood and addressed where improvement is needed.
- 7.1.4 Where performance or conduct falls below expected standards, Line Managers must address issues promptly and constructively, including where this impacts resident outcomes or service quality. This will include providing proactive support, coaching or additional training where appropriate, setting clear improvement expectations and review periods, and using formal capability or disciplinary procedures where required.
- 7.1.5 This policy is underpinned by Eastlight's Code of Conduct, which sets out the behaviours expected of all employees. The Code of Conduct has been informed by the National Housing Federation Code, which recognises that professionalism, consideration and respect for others are fundamental to the delivery of social purpose.
- 7.1.6 All employees and workers are required to confirm knowledge and understanding of the Eastlight Code of Conduct and expected to demonstrate high standards of professional behaviour at all times, in line with the Eastlight Code of Conduct. Any breaches of this may result in disciplinary action or withdrawal of services.

- 7.1.7 The Eastlight Code of Conduct will be reinforced through induction, training and leadership behaviours to ensure expectations are clearly understood and consistently applied.

8. Continuous Professional Development

- 8.1** Continuous Professional Development (CPD) is an ongoing process of learning, reflection and application that enables employees, agency workers and contractors to maintain and improve professional competence.
- 8.2** CPD may include:
- Formal training and accredited qualifications
 - Mandatory and refresher training
 - On-the-job learning and coaching
 - Shadowing, mentoring and secondments
 - Self-directed learning and reflective practice.
- 8.3** It is the individual's responsibility to record their CPD activity, via our Learning Management System, EastLearn, 1-2-1s and Performance Appraisal Review process. CPD expectations will be proportionate to role, responsibility and risk. Learning and CPD activity will be monitored and used as part of Eastlight's wider assurance and continuous improvement, and to evidence compliance with regulatory expectations.
- 8.4** All employees, contractors and agency workers are expected to take an active role in their own development. Learning from complaints, feedback, audits and service reviews will be systematically used to inform CPD priorities and organisational learning.
- 8.5** Themes and learning from complaints and service failures will be used to inform performance management, training and continuous development.

9. Managed Services & Arms-Length Management Organisations

- 9.1** Eastlight expects all its external managed service providers to demonstrate the same high standards of professionalism, competence and conduct that we expect of our own employees.

9.2 Where housing services are delivered by external managed services providers, we will take reasonable steps to ensure individuals meet competence and conduct expectations if determined to be in scope. This may include ensuring appropriate requirements are stated within contracts and service specifications, monitoring contractor or service provider performance, and taking action promptly where standards agreed upon or expected are not met.

9.3 Eastlight may request evidence of qualifications, competence, training records or accreditation from service providers where appropriate.

9.4 Service providers must:

- Act lawfully, ethically and professionally at all times
- Treat Eastlight employees and residents with dignity, respect and fairness
- Maintain appropriate professional boundaries
- Work within the limits of their role, authority and competence
- Recognise and respond appropriately to safeguarding and modern slavery concerns
- Use clear, respectful and inclusive language when communicating
- Comply with all relevant Eastlight policies, standards and contractual requirements.

9.5 Competence & Training

9.5.1 Service providers are expected to ensure that:

- Their employees delivering services are suitably qualified, trained and experienced
- Mandatory training (including safeguarding, health and safety, data protection and equality) is completed and kept up to date
- Employees are appropriately supervised and supported.

9.6 Monitoring & Assurance

9.6.1 Eastlight will hold service providers to account through:

- Best practice procurement in compliance with UK and Eastlight regulations
- Due diligence and pre-engagement checks
- Ongoing contract management and performance monitoring
- Audits, inspections and service reviews
- Complaints, feedback and resident insight
- Performance data and assurance information relating to competence, training compliance and conduct will be regularly reviewed and used to inform risk management and continuous improvement.

9.7 Where concerns about competence or conduct arise, Eastlight will take appropriate

action, which may include improvement plans, additional assurance or contract termination.

- 9.8** Within the context of this policy, relevant managed service providers and ALMOs are expected to meet the same standards of competence, conduct and professionalism as directly employed staff, where their roles fall within the scope of housing service delivery.

10. Equality Impact Assessment

- 10.1** An Equality Impact Assessment (EIA) for this policy was conducted. As a result, actions have been put in place to mitigate any negative impacts.

11. Review

- 11.1** The Head of People & Organisational Development will monitor the effectiveness of the Competence & Conduct Policy every two years or sooner; for example, if a material change in circumstances arises, such as legislative changes.
- 11.2** The Executive Team will receive quarterly compliance reports, and the Governance & People Committee will receive annual reports with key metrics such as qualification compliance, mandatory training completion, CPD activity, and competence-related performance indicators.
- 11.3** The Governance Team also produces an annual report on compliance with the Consumer Standards, which will include competence and conduct once the regulations are live.
- 11.4** Residents will be provided with meaningful opportunities to influence and scrutinise the development and review of this policy and the Eastlight Code of Conduct through resident panels, scrutiny groups, consultation exercises and other engagement mechanisms. Feedback received will be considered when reviewing and updating the policy and code.
- 11.5** Residents have and will continue to be consulted on the policy's development, and it will be made available on the Eastlight website. The Eastlight Code of Conduct will similarly be subject to resident review and made available on the Eastlight website.
- 11.6** Eastlight will maintain a clear assurance framework to demonstrate compliance with the Competence & Conduct Standard. This will include:
- Qualification compliance rates for in-scope roles
 - Mandatory training completion rates

- CPD participation and recording
 - Complaints and incidents relating to competence and conduct
 - Internal audit findings and service reviews
 - Skills gap analysis and workforce planning data.
- 11.7** This information will be used to identify risks, inform decision making and drive continuous improvement.
- 11.8** This framework will be subject to periodic internal audit and review to ensure its effectiveness and ongoing compliance with regulatory expectations. Assurance outcomes will be reported to the Executive Team and Governance & People Committee to support effective oversight.

12. Definitions

- 12.1 Housing management services** - Housing management services are the day-to-day activities required to manage tenancies and deliver services to residents, ensuring homes are safe, compliant and that resident needs are met.
- 12.2 Senior Housing Managers** - Senior Housing Managers are individuals responsible for leading or managing housing management services, with accountability for service delivery, performance, compliance and resident outcomes. Typically defined as roles where 50% or more of the role is focused on operational management of housing services under the regulatory framework/guidelines.
- 12.3 Senior Housing Executives** - Senior Housing Executives are the most senior leaders accountable for housing services at an organisational level, setting strategy and ensuring regulatory compliance. Typically defined as roles where 50% or more of the role is focused on strategic leadership, oversight and accountability for housing services under the purpose of regulatory framework/guidelines.
- 12.4 Agency Worker** - An Agency Worker is an individual supplied by an employment agency or business to work temporarily for an organisation, where the agency is the worker's employer and is responsible for paying them.
- 12.5 Contractor** - A Contractor is an individual engaged to deliver specific services or work under a contract for services, rather than as an employee.
- 12.6 Managed Services** – Managed Services refers to arrangements where housing management or related services are delivered, in whole or in part, by an external organisation on behalf of the provider. This may include contractors, third-party providers, or partner organisations responsible for delivering services to residents under a formal agreement.

- 12.7** Arms-Length Management Organisation (ALMO) – an ALMO refers to a company or organisation set up by a local authority to manage and deliver housing services on its behalf, operating independently while the local authority retains ownership of the housing stock.

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