



Competence and Conduct Standard Policy

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Introduction

- 1.0 From 1 October 2026, the Regulator of Social Housing's (RSH) Competence and Conduct Standard will require registered providers to ensure that relevant employees under the standard have the skills, knowledge, experience and behaviours needed to deliver good-quality landlord services, and to meet specified qualification requirements where applicable. It also places requirements on registered providers in relation to relevant managers employed by service providers delivering housing management services on their behalf.
- 1.1 This policy sets out how we will meet the requirements of the Standard by securing the skills, knowledge, experience and behaviours required by all relevant employees involved in landlord services, identifying the narrower group of employees and service provider managers who are subject to qualification requirements, supporting progress towards required qualifications and maintaining auditable evidence of compliance.
- 1.2 In line with the requirements of the Standard and the Consumer Standards Code of Practice, the policy has been informed by tenant feedback, including feedback from our tenant forum, InsightXChange.

2.0 Purpose

- 2.1 The purpose of this policy is to demonstrate how we will comply with the Competence and Conduct Standard by ensuring that relevant employees involved in landlord services have the skills, knowledge, experience and behaviours needed to deliver good-quality landlord services; that relevant employees meet specified qualification requirements where applicable; that appropriate steps are taken in relation to relevant employees and relevant managers employed by service providers; and that competence, conduct, learning, appraisal, evidence and assurance arrangements are maintained and regularly reviewed.

3.0 Principles

- 3.1 The principles underpinning this policy are shaped by the requirements of the Competence and Conduct Standard and will be applied through our values and expected behaviours:
 - **Trust** – we will take an open, evidence-based approach to identifying relevant employees, assessing roles, confirming qualification requirements and monitoring progress, so employees understand what is expected and tenants can be assured that landlord services are delivered by competent people;
 - **Respect** – we will apply the Standard fairly and professionally, recognising diverse needs and making reasonable adjustments where required so employees can access qualifications, support and development linked to their role and tenants receive respectful, equitable services;
 - **Innovate** – we will use data, tenant insight and appropriate technology to maintain auditable evidence, track qualification progress, identify risks to compliance and improve how competence, conduct and professional standards support good-quality landlord services;
 - **Work Together** – we will work with employees, managers, service providers, contractors, tenants and customers to secure the skills, knowledge, experience, behaviours and qualifications needed to deliver good-quality landlord services and meet the requirements of the Standard; and

- **Own It** – we will take individual and collective responsibility for complying with this policy, maintaining accurate records, escalating risks or gaps early and taking corrective action where competence, conduct, qualification or service provider requirements are not being met.

4.0 Definitions

4.1 The key terms used in this policy are defined below.

Competence	The skills, knowledge, experience, behaviours and professional judgement required to perform a role effectively.
Conduct	The standards of behaviour and professional conduct expected of employees, including compliance with the Code of Conduct.
Competence and Conduct Standard	The RSH consumer standard, supported by the Consumer Standards Code of Practice, requiring registered providers to ensure relevant employees have the skills, knowledge, experience and behaviours needed to deliver good-quality landlord services, meet specified qualification requirements where applicable, and take appropriate steps in relation to relevant managers employed by service providers delivering housing management services on their behalf.
Code of Conduct	The document setting out the standards of behaviour and professional conduct expected of all employees.
Continuous professional development (CPD)	The ongoing process through which individuals maintain and enhance their knowledge, skills, behaviours and professional competence through learning and reflection.
Housing management services	Services provided in connection with the management of social housing, as described at paragraph 8.2.
Relevant employee(s)	For the purpose of this policy, all Livin employees involved in the provision or management of landlord services are relevant employees for the broader competence, conduct, learning, appraisal and behavioural requirements of the Standard.
Relevant employee(s) for qualification purposes	The narrower cohort of employees who meet the regulatory criteria for Senior Housing Executives or Senior Housing Managers and are therefore subject to the qualification requirements described in this policy.

Senior Housing Manager	A relevant employee with the operational responsibilities described at paragraph 8.5.
Senior Housing Executive	A relevant employee with the strategic responsibilities described at paragraph 8.6.
Service providers	Organisations that, under an agreement with Livin, provide or arrange services connected with the management of Livin's social housing. This may include contractors and subcontractors. Service providers may be subject to competence, conduct, assurance and evidence requirements regardless of whether their managers are subject to qualification requirements. Qualification requirements will only apply where the service provider assessment determines that the relevant regulatory criteria are met.
Relevant service provider manager	A manager employed by a service provider who meets the applicable regulatory criteria. Where no exemption applies and the relevant qualification requirements are triggered, the individual may be required to hold, or work towards, a relevant qualification.
Relevant qualification(s)	A qualification that meets the requirements described at paragraphs 8.9 to 8.12.
Regulator of Social Housing (RSH)	The independent regulator responsible for setting standards and regulating registered providers of social housing in England, including requirements relating to governance, financial viability, value for money and consumer standards.

5.0 Scope

- 5.1 This policy applies to all relevant employees involved in the provision or management of landlord services for the purposes of competence, conduct, learning, appraisal and behavioural expectations. The qualification requirements apply only to the narrower cohort of relevant employees and relevant service provider managers who meet the applicable regulatory criteria.
- 5.2 The policy covers the assessment, qualification, conduct, evidence, monitoring and assurance arrangements required to demonstrate compliance with the Competence and Conduct Standard.
- 5.3 Where an employee, contractor or subcontractor does not fall within the qualification requirements, we will still apply proportionate competence, conduct, learning, assurance and contract management arrangements where their role or services affect tenants or landlord services.

- 5.4 The policy does not apply to all employees, all service providers, contractors or subcontractors, or to wider organisational development activity unless the person, role or arrangement meets the relevant criteria under the Standard.
- 5.5 We will maintain a documented assessment of service providers, contractors and subcontractors to determine whether they provide services connected with the management of Livin's social housing; the competence, conduct, training and assurance requirements applicable to those services; whether they deliver paragraph 59 functions amounting to a comprehensive housing management service; whether any Relevant Service Provider Managers are identified and qualification requirements or exemptions apply; and the contractual, monitoring, information and review arrangements required. Assessments will be retained as evidence and reviewed when services, responsibilities or contractual arrangements change.

6.0 Contribution to Plan A

- 6.1 This policy contributes to Plan A by supporting compliance with the Competence and Conduct Standard and by helping to ensure that relevant employees, and relevant service provider managers where applicable, have the skills, knowledge, experience, behaviours and qualifications needed to deliver good-quality landlord services.
- 6.2 The policy supports Plan A outcomes by recognising that competent, professional and appropriately qualified people are essential to consistent, respectful and effective landlord services for tenants.

7.0 Legislative and regulatory framework

- 7.1 This policy supports compliance with the Competence and Conduct Standard and the Consumer Standards Code of Practice. The Standard is set by the Regulator of Social Housing under its powers in the Housing and Regeneration Act 2008, within the wider consumer regulation framework strengthened by the Social Housing (Regulation) Act 2023.
- 7.2 Statutory terms will apply to relevant agreements where required by law. We will ensure that procurement, contract management and assurance arrangements recognise the effect of those statutory terms, including requirements to provide information and evidence needed to demonstrate compliance with the Competence and Conduct Standard.

8.0 Policy statements

- 8.1 We will comply with the Regulator of Social Housing's Competence and Conduct Standard, including the requirements relating to the skills, knowledge, experience, behaviours and relevant qualifications of our employees who meet the definition of a relevant employee, and the requirements relating to relevant managers employed by service providers delivering housing management services on our behalf.
- 8.2 We will define housing management services as services provided in connection with the management of social housing. This will include customer services, complaints, tenant involvement or empowerment, allocations and lettings, tenancy management, income management, anti-social behaviour management, repairs and maintenance, asset management, estate management, and capital or major works to occupied social housing assets.

- 8.3 We will define a relevant employee for qualification purposes as a Senior Housing Executive or Senior Housing Manager with a substantive role in managing housing management services who meets the applicable regulatory criteria, including the 12-month threshold, and is not a volunteer or covered by a documented exemption.
- 8.4 We will identify relevant employees by assessing whether the management of housing management services forms a significant and substantive part of that employee's role and responsibilities.
- 8.5 We will ordinarily regard a Senior Housing Manager as a relevant employee with responsibility and autonomy for the operational management, quality, safety or delivery of housing management services to social housing tenants. Employees whose role is primarily to implement decisions, procedures or instructions set by others, without significant authority over service delivery, quality, safety or service change, would not ordinarily be regarded as Senior Housing Managers.
- 8.6 We will ordinarily regard a Senior Housing Executive as a relevant employee with strategic responsibility and accountability for the management, organisation or oversight of housing management services to social housing tenants.
- 8.7 We will maintain an auditable role assessment record for relevant employees, including role title, housing management responsibilities, substantive role assessment, qualification status, exemption status and rationale, transition deadline, progress position and review date.
- 8.8 We will monitor role changes, succession arrangements and future appointments to identify employees who may become relevant employees, so that qualification requirements, timescales and support arrangements are considered before or at the point a person moves into scope.
- 8.9 We will require relevant employees for qualification purposes to hold, or work towards, a Relevant Qualification at the applicable level that meets the qualification type, total qualification time and course-content requirements appropriate to their role. Senior Housing Managers must meet the Level 4 requirement and Senior Housing Executives must meet the Level 5 or foundation-degree requirement. These requirements may be met through the applicable general housing management, technical housing management or cross-tenure/cross-cutting qualification route, or through an equivalent or higher-level qualification that satisfies the applicable course-content requirements. Qualifications must have total qualification time of more than 120 hours and be appropriate to the role, including general, technical, cross-tenure or cross-cutting housing management responsibilities. Where a qualification is only partially compliant, we will identify the unmet content requirements and require additional training or development within the required timescale.
 - For general housing management roles, the qualification must focus on managing the delivery of housing services and cover professional practice, collaborative working, professional judgement, ethical practice, equality, diversity and inclusion, tenant needs and vulnerabilities, customer service, tenant engagement, respectful and professional services, national housing policy, and housing law and regulation. For Senior Housing Executives, it must also cover leadership and management in housing management, stakeholder engagement and managing relationships.
 - For technical housing management roles, including roles managing

repairs and maintenance, asset management, building or fire safety, estate management, or capital or major works within occupied buildings, the qualification must either meet the applicable general housing-management content requirements or be at the required level, broadly relevant to the employee's role, and cover an appropriate technical discipline such as surveying, building management or maintenance, construction, building or fire safety, estate management, facilities management or property management. It must also develop knowledge and skills in customer service in housing, effective tenant engagement, respectful and professional services, equality, diversity and inclusion, and awareness of tenant needs and vulnerabilities.

- For cross-tenure or cross-cutting roles, we will assess whether the general, technical or cross-tenure qualification criteria are most appropriate. Where a qualification is based on leasehold or residential property management, it must be broadly relevant to the role and must also cover customer service in housing, effective tenant engagement, respectful and professional services, equality, diversity and inclusion, and awareness of tenant needs and vulnerabilities.

- 8.10 We will treat a relevant employee as working towards a relevant qualification only where they are enrolled on, progressing towards, or taking permitted steps to obtain it, supported by a documented completion plan. The plan will be agreed by the employee, their manager and People Services and will set out review dates, evidence requirements, support arrangements, applicable provider or regulatory timescales, escalation triggers and the consequences of failure to make satisfactory progress. Where absence, health, disability, maternity, parental leave or prerequisite learning affects progress, we will document the adjusted approach and ensure it remains reasonable, proportionate and capable of achieving compliance.
- 8.11 We will recognise equivalent, higher-level or partially compliant qualifications only where we have documented that the level, type, learning time and course content meet the applicable requirements. Professional membership alone will not be accepted as a qualification. Where a qualification is partially compliant, we will identify the unmet content requirements, confirm whether prior modules remain acceptable, agree the additional modules, training or development required, and retain a completion plan showing timescales, evidence and review arrangements. A technical qualification that meets the applicable level and technical relevance requirements but does not cover all mandatory tenant-facing, professional-service, equality, diversity, inclusion or vulnerability content will be treated as a Partially Compliant Qualification. We will require additional modules of appropriate volume, quality and level to address the identified gaps. Where suitable additional modules cannot be identified, the employee will be required to work towards a Relevant Qualification. Where a technical, equivalent or higher-level qualification does not meet all applicable course-content requirements, we will identify the gaps and require additional modules, training or development to achieve compliance.
- 8.12 We will ensure that all relevant employees who are in scope at the start of the transition period, or who become relevant employees within the first 24 months of that period, hold, or are working towards, a relevant qualification by the end of the 36-month transition period, 30 September 2029. We will retain evidence supporting the applicable provider-size category and transition calculation. Where an employee becomes a relevant employee after the first 24 months of the transition period, the normal qualification rules will apply and we will document the required qualification route, timescale and monitoring arrangements.

- 8.13 We will apply the qualification requirements only where an employee meets the definition of a relevant employee. Where a role, function or individual is assessed as out of scope, or where an exemption applies, we will document, retain and periodically review the rationale, including where functions relate only to business support services, new-build activity, care and support, statutory homelessness or housing register activity.
- 8.14 We recognise that the Competence and Conduct Standard distinguishes between: (a) the broader requirement to ensure relevant employees and relevant service provider employees have the skills, knowledge, experience and behaviours needed to deliver good-quality landlord services; and (b) the narrower qualification requirements that apply only to relevant employees and relevant service provider managers who meet the applicable regulatory criteria. Qualification exemptions do not remove Livin's responsibility to obtain assurance regarding competence, conduct and service quality.
- 8.15 We will assess service providers, contractors and subcontractors whose services are connected with the management of Livin's social housing. We will take proportionate steps to obtain assurance that relevant service provider employees have the skills, knowledge, experience and behaviours needed to deliver good-quality landlord services. Where a service provider assessment determines that qualification requirements apply, we will use contractual and monitoring arrangements to obtain evidence of compliance, progress and assurance.
- 8.16 Where service providers, contractors or subcontractors are assessed as exempt from qualification requirements, or where no relevant service provider managers are identified, we will retain the assessment outcome and continue to apply proportionate contract management, competence, conduct and assurance arrangements appropriate to the services being delivered.
- 8.17 Outsourcing, subcontracting or changes to delivery arrangements must not result in Livin's own accountable roles, client-side responsibilities or contract-management duties being overlooked when determining the scope of the Standard, qualification requirements or assurance arrangements.
- 8.18 We will bring the qualification requirements and any statutory or implied contractual terms to the attention of relevant service providers; require service providers to cascade applicable requirements to subcontractors; obtain information and evidence needed to assess compliance; require timely rectification where gaps are identified; and manage persistent or material breaches through contract management remedies, escalation and governance reporting.

Competence, learning and development

- 8.19 We will maintain role-based competence expectations for relevant employees involved in landlord services. These will identify the skills, knowledge, experience, behaviours, professional judgement, mandatory learning and role-specific requirements needed to deliver good-quality landlord services, with reasonable adjustments made where required.
- 8.20 Competence will be supported through recruitment and onboarding checks, induction, mandatory learning, role-specific development, CPD, refresher learning where requirements change, and individual learning-needs analysis through Check-Ins and appraisals. Managers will consider whether learning has been applied in practice and will

agree remedial development where service performance, audit, complaints, tenant feedback or other evidence identifies a competence gap.

- 8.21 We will retain a competence and development record for relevant employees, including required capabilities, learning completed, CPD or refresher activity, assessed gaps, agreed actions, support, review dates and evidence of applied competence where relevant to the role.

Appraisal, performance and conduct

- 8.22 Relevant employees will have competence, performance and behaviour reviewed through Check-In and appraisal arrangements. Reviews will be proportionate to the role and will consider objectives, technical and professional competence, application of learning, mandatory or qualification requirements, behaviour against our values and Employee Code of Conduct, and relevant evidence from service quality, tenant feedback, complaints, assurance findings and management observation. Managers will record strengths, development needs, actions, support, timescales and review dates.
- 8.23 Where a competence, performance or behavioural concern is identified, we will assess the seriousness and tenant or service risk, take any immediate protective action required, agree proportionate support or an improvement plan, and retain evidence of progress. Persistent or serious failure, refusal to undertake or progress a required qualification, or breach of the Employee Code of Conduct will be managed through the applicable people procedure and escalated where it creates a material compliance risk.
- 8.24 Livin adopts and adapts the National Housing Federation's (NHF) Code of Conduct as its Code of Conduct for the purposes of the Competence and Conduct Standard. The Code will be issued to employees at induction and when materially revised, supported by annual recorded confirmation, reflected in Check-Ins and appraisals, and monitored through themes from complaints, employee relations, whistleblowing, assurance work, tenant feedback and other relevant sources.

Customer data and voice

- 8.25 We will use data, tenant insight and tenant voice to inform the development, implementation, monitoring and review of this policy, including learning from InsightXChange, the annual Tenant Satisfaction Measures Perceptions Survey, other survey outcomes, feedback, complaints and service performance.
- 8.26 We will provide clear tenant-facing information about how this policy supports competent, professional and respectful landlord services, using our website, annual reporting to tenants and other communication channels where appropriate.
- 8.27 We will provide meaningful opportunities for tenants to influence and scrutinise the development, adoption, material revision and review of this policy and the Employee Code of Conduct. We will document tenant recommendations, our response to those recommendations, any resulting changes and any reasons for not adopting specific proposals.

Service standards and performance

- 8.28 We will monitor and report appropriate measures that demonstrate delivery of this policy and compliance with the Competence and Conduct Standard through established performance, assurance and tenant reporting arrangements. We will publish information demonstrating our compliance with the Standard on our website and in our Annual Report to Tenants.

Diverse needs

- 8.29 We will implement this policy fairly and inclusively, in line with the Equality, Diversity and Inclusion Policy, and will make reasonable adjustments where required so employees can access qualifications, support and development linked to their role. Where disability, health, extended absence, maternity, parental leave or other protected circumstances affect progress towards a required qualification, we will agree a documented and proportionate approach that supports completion within an appropriate timeframe.
- 8.30 Relevant learning, development and qualifications will include equality, diversity, inclusion and vulnerability where required by the qualification criteria or role, so services are delivered with fairness, respect and a focus on equitable outcomes for tenants.

Communication

- 8.31 We will provide digital access to this policy and the Employee Code of Conduct through our website and will support tenants to access information in the way that best meets their needs, including providing a Plain English summary and hard copies or alternative formats on request.

Feedback and complaints

- 8.32 Customers can provide feedback about services delivered under this policy. Where a customer is dissatisfied with the service received, or with how this policy has been implemented, they may make a complaint in line with our Complaints, Compliments and Feedback Policy.

9.0 Roles and responsibilities

- 9.1 Roles and responsibilities under this policy are outlined below.

Board	Responsible for overall regulatory accountability and for receiving assurance that Livin complies with the Competence and Conduct Standard.
People and Governance Committee	Responsible for approving this policy and obtaining assurance that it is implemented effectively and supports compliance with the Competence and Conduct Standard.
Executive Management Team	Responsible for ensuring that this policy is implemented, resourced and monitored so Livin can demonstrate compliance with the Competence and Conduct Standard.

Executive Director of Corporate Services	Policy owner, responsible for oversight of implementation, approving supporting procedures and escalating material compliance risks to EMT and the People and Governance Committee.
Head of People	Responsible for implementing this policy through supporting procedures, maintaining the relevant employee register, qualification tracker, exemption records, evidence records and compliance reporting arrangements.
Heads of Service and managers	Responsible for identifying role changes, future appointments and service changes that may affect scope, supporting relevant employees to meet qualification requirements, providing evidence when required and escalating risks to compliance.
Relevant employees	Responsible for complying with the Employee Code of Conduct, engaging with required qualification routes, maintaining evidence of progress, completing agreed learning and escalating issues that may affect compliance.
Procurement and contract managers	Responsible for ensuring service provider, contractor and subcontractor assessments are completed and maintained; appropriate competence, conduct and assurance requirements are established; qualification requirements are identified where applicable; evidence is obtained; and non-compliance or emerging risks are managed through contract management arrangements.
Service providers, contractors and subcontractors	Responsible for meeting agreed competence, conduct, training, qualification, notification, subcontractor information, monitoring, evidence and assurance requirements where their services are connected with the management of Livin's social housing, whether or not qualification requirements apply.
Relevant service provider managers	Responsible, where required by contract or assurance arrangements, for providing evidence that qualification, competence, conduct and progress requirements are being met.

All employees	Responsible for understanding and following this policy where it applies to their role, complying with the Employee Code of Conduct and contributing to competent, professional and respectful landlord services.
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- 9.2 This policy will be published on our intranet and website. Those responsible for implementing or applying the policy will confirm their understanding and will receive appropriate training, advice or guidance.

10.0 Related policies and procedures

- 10.1 This policy should be read in conjunction with the following documents.

Employee Code of Conduct	Establishes behavioural expectations and professional standards for employees.
Access to Services Policy	Sets out how Livin will make services accessible, respond to diverse needs and make reasonable adjustments where required.
Complaints, Compliments and Feedback Policy	Sets out how tenants can provide feedback or complain about services delivered under this policy.
Customer Vulnerability Policy	Sets out how we will identify diverse needs and make reasonable adjustments when delivering services and applying policies.
Equality, Diversity and Inclusion Policy	Sets out our commitment to promoting equality, diversity and inclusion, eliminating discrimination and ensuring fair, inclusive access to employment, services and decision-making.
Organisational Development Policy	Sets out how we will develop the skills, capability and performance of our people to support delivery of Plan A and regulatory requirements.
Social Tenant Access to Information Requirements (STAIRs) Policy	Sets out how we will comply with the government's Policy Statement and the RSH's standards in relation to STAIRs, ensuring transparency, openness and tenant empowerment in being able to hold us to account.
Workforce Strategy	Sets out our strategic approach to workforce planning, resourcing, development and talent management.

- 10.2 These documents will be published on our website where appropriate.

11.0 Monitoring, assurance and review arrangements

11.1 Assurance that this policy is being complied with and is achieving its purpose will be gained as follows:

Type of assurance	Key source	Frequency
Management assurance	Monitoring of relevant performance and assurance metrics, relevant employee and qualification records, competence, learning and appraisal records, service provider assessments and compliance arrangements, Code of Conduct assurance, tenant scrutiny evidence, and remediation actions.	Ongoing
Corporate oversight	Reporting of relevant performance and assurance metrics to EMT, the People and Governance Committee and/or the Board as required.	Quarterly
	Annual report to the People and Governance Committee and annual self-assessment against the Code of Conduct and the Consumer Standards reported to the Board.	Annually
Independent assurance	Internal audit of this policy and/or compliance with the Competence and Conduct Standard.	Periodic
	Regulatory inspection	At intervals determined by the RSH.

11.2 We will maintain auditable records to evidence delivery of this policy, including role, relevant employee competence, service provider, contractor, subcontractor, qualification and exemption assessments; qualification status and progress; CPD, learning and appraisal records; Code of Conduct confirmations; assurance records; review dates; changes in circumstances; tenant influence and scrutiny evidence; and the rationale for any in-scope or out-of-scope decision. Records will be available to auditors and the RSH on request.

11.3 This policy will be reviewed at least every three years, or sooner following significant legislative, regulatory, organisational, audit, assurance, service-delivery, contractor or tenant feedback changes.