

Competence & Conduct Policy

Version control

Avoid referring to printed versions of this document. Printed versions may be out of date.

Owner/responsibility for compliance		Head of Housing Improvement & Strategy	
Status (Draft / Approved & Live)		Approved & Live	
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1.1	8 October 2026	Cabinet	New policy

Introduction

- 1.1 This policy is to support Swindon Borough Council ('the Council') in its function as a landlord to provide safe and effective housing management.
- 1.2 The aim of this policy is to support the Council to provide high-quality housing services that place tenants and leaseholders at the heart of everything the Council does.
- 1.3 This policy outlines the Council's approach to managing and developing the skills, knowledge, experience and behaviours of Housing colleagues, and how this is tailored to different roles.
- 1.4 The policy will cover the approach to learning and development including how the Council ensures that relevant colleagues maintain and demonstrate appropriate and up to date skills, knowledge, experience and behaviours in their roles.
- 1.5 This policy will describe the Council's approach to appraising and regularly reviewing the performance of relevant colleagues, including the approach to managing poor performance.
- 1.6 The policy will also outline the appropriate steps the Council will take to secure that the relevant colleagues have the necessary skills, knowledge and experience, and exhibit the behaviours needed, for the landlord services to be of good quality.
- 1.7 In developing this policy residents' and partnering agencies' views and feedback have been considered. An Equalities Impact Assessment has been carried out, and there are no adverse implications.
- 1.8 The results of the Equalities Impact Assessment have been considered and there are no adverse implications or if there were these have been considered and mitigated.

2 Equality and diversity statement

2.1 Swindon Borough Council is intent on ensuring people or communities do not face discrimination or social exclusion due to socio-economic deprivation, or any of the following protected characteristics:

- Age
- Disability
- Sex
- Marriage & civil partnership
- Race
- Religion or belief
- Sexual orientation
- Gender reassignment
- Pregnancy & maternity

2.2 Legislation:

- The Social Housing (Regulation) Act 2023
- Equality Act 2010

Scope

- 2.3 This policy is to ensure the Council is compliant with the Competence and Conduct Standard, monitored by the Regulator of Social Housing. The standard applies to all registered providers (housing associations and local authority landlords).
- 2.4 The standard defines this as someone spending the majority of their time on housing management or having housing management as a substantial aspect of their role.
- 2.5 This policy applies to all colleagues employed or part funded through the Housing Revenue Account and managed by Swindon Borough Council's Housing department.
- 2.6 Back-office functions such as IT, HR, and Finance are out of scope.

3 Approach

Managing and developing skills, knowledge, experience and behaviours

- 3.1 All Registered Providers of social housing must ensure all colleagues have the skills, knowledge, experience and behaviours needed to deliver safe, high-quality, respectful services to tenants.
- 3.2 The Standard requires all Registered Providers of Housing to:
- Ensure relevant colleagues possess the skills, knowledge and experience required to deliver good-quality landlord services.
 - Ensure relevant managers hold, or are working towards, prescribed housing qualifications.

- Promote high standards of professional conduct and behaviour.
 - Maintain effective arrangements for learning, development and performance management.
- 3.3 Provide opportunities for customers to influence and scrutinise competency and conduct arrangements
- 3.4 There is now a requirement for certain senior roles to hold, or be working towards, a relevant housing qualification; there is a two-year grace period in which to arrange this. This is intended to raise professional standards, ensure consistency across the sector, and give tenants confidence that those leading and managing housing services have the right knowledge and expertise. Gaps in knowledge will be identified in one-to-ones.
- 3.5 The specific qualifications that will meet the requirement, along with rules on equivalents, apprenticeships and minimum course standards are as follows:
- Senior housing executives: Ofqual-regulated Level 5 in housing/foundation degree (or equivalent).
 - Senior housing managers: Ofqual-regulated Level 4 in housing management (or equivalent).
- 3.6 Equivalent or higher qualifications (e.g. degrees, CIH PQ, DipHE, HND) recognised if they meet content criteria.
- 3.7 Partially compliant qualifications can be “topped up” with additional accredited training modules.
- 3.8 All qualifications must meet course content criteria and a minimum total qualification time of 120 hours.
- 3.9 Directors and Heads of Service are responsible for:
- Embedding professional standards within their services.
 - Ensuring colleagues have access to appropriate training and development.
 - Monitoring compliance with qualification requirements.
 - Promoting a culture of continuous learning and improvement.
- 3.10 Managers are responsible for:
- Completing Learning needs assessments.
 - Supporting learning and development activity.
 - Undertaking regular supervision and performance reviews.
 - Monitoring competency and conduct.
 - Addressing performance concerns appropriately.
 - Supporting colleagues undertaking qualifications.
- 3.11 Colleagues in Housing and Operations are responsible for:
- Maintaining professional competence.
 - Completing required learning and development activities.

- Recording continuing professional development.
- Demonstrating professional behaviour.
- Acting in accordance with the Council's values, policies and procedures.
- Treating customers with respect, dignity and fairness.

Apprenticeships

- 3.12 Apprenticeships will be recognised where they meet content and assessment requirements.

Support for specific circumstances

- 3.13 The requirements recognise that some colleagues may face temporary barriers to immediate study or completion. The council will take a supportive and proportionate approach, ensuring colleagues are not disadvantaged due to circumstances beyond their control, while still maintaining progress towards compliance, for example:
- New starters – individuals who join in-scope roles will be expected to enrol promptly after appointment and begin their qualification at the earliest reasonable opportunity.
 - Maternity, paternity or adoption leave – colleagues on leave will not be expected to continue their studies during this period. The Council will support them to reengage and complete the qualification when they return.
 - Long-term sickness or other exceptional circumstances – reasonable adjustments and extensions to completion deadlines will be considered where appropriate.
- 3.14 The Council recognises Senior Housing Executives to be the Director Housing and the Director of Operations.
- 3.15 The Council considers the following roles to meet the definition of Senior Housing Manager (this list will be reviewed and updated annually, or following any restructure of the service to ensure all roles are captured):
- Head of Housing Communities.
 - Head of Housing Services.
 - Head of Housing Improvement & Strategy.
 - Head of Housing Technical Services.
 - Tenancy Housing Manager.
 - Prevention Housing Manager.
 - Enforcement Housing Manager.
 - Sheltered Housing Manager.
 - Rents Housing Manager.
 - Lettings Housing Manager.
 - Right Home Housing Manager.
 - Supported Housing Manager.
 - Accounts Housing Manager.
 - Estate Services Housing Manager.

- Engagement & Inclusion Housing Manager.
- Quality & Performance Housing Manager.
- Assets & Development Technical Housing Manager.
- Property Condition Technical Housing Manager.
- Capital Works Technical Housing Manager.
- Compliance Technical Housing Manager.
- Service Lead – Surveyors.

Learning and development

- 3.16 Mandatory training keeps colleagues, the people they support, and the Council safe. It ensures the Council meets its legal duties, follows best practice, and works to the highest standards. Compliance with mandatory training is monitored monthly by the Senior Leadership team.
- 3.17 The Council has a range of mandatory corporate e-learning that every colleague must complete, and there may also be role-specific training needed.
- 3.18 The Council offers a range of learning and development, including:
- **New Starters:** Corporate Induction and E-learning.
 - **Training and Development for all:** A whole range of learning and development opportunities, ranging from E-learning courses, Coaching and Mentoring opportunities, Apprenticeships and classroom-based courses.
 - **Managers, Supervisors and Leaders:** Training to support colleagues in their management and leadership practice.
 - **Wellbeing and Inclusion:** A range of opportunities to access support and learning.
- 3.19 The Council will undertake regular learning needs analysis to identify:
- Skills gaps.
 - Development opportunities.
 - Emerging regulatory requirements.
 - Future workforce requirements.
- 3.20 The Council will support colleagues through:
- Professional qualifications.
 - Continuing Professional Development.
 - Mandatory training programmes.
 - Learning and management development.
 - Regulatory and compliance learning.

Leadership expectations

- 3.21 The Council's Leadership Expectations Framework sets out the standards we expect all leaders and managers at Swindon Borough Council to demonstrate. The framework was developed using feedback from colleagues through the colleague survey, values engagement sessions, Swindon Commitment conversations and discussions with

Directors. It is designed to create greater consistency in how leadership is experienced across the organisation and to support delivery of the Swindon Commitment. We ensure compliance with the Swindon Commitment through one-to-ones and performance development reviews.

3.22 The framework is built around the Council's five values:

- **We See:** Making informed decisions, setting clear priorities and understanding what is happening in our services.
- **We Hear:** Listening to colleagues, residents and partners and communicating openly.
- **We Care:** Supporting colleagues to succeed and create fair, inclusive and supportive working environments.
- **We Act:** Taking ownership, following through on commitments and holding ourselves accountable.
- **We Learn:** Learning from feedback, complaints, audits, inspections and experience to continually improve.

3.23 These five values describe the standards the Council holds itself to, and what residents and partners can expect.

3.24 The Leadership Expectations are supported by a set of mandatory management requirements which establish the minimum standards every colleague should be able to expect from their manager. These include:

- Regular performance and development conversations.
- Completion of PDRs.
- Attendance management responsibilities.
- Mandatory learning compliance.
- Team communication and engagement.
- Leadership visibility.
- Delivery of audit, inspection and improvement actions.

Performance

3.25 The Council has a Capability Policy (HRP 017), developed in accordance with relevant employment legislation and the ACAS Code of Practice.

3.26 This policy aims to establish a high-performance work environment where people are enabled to do their best. It is the Council's intention to maximise colleague potential and capabilities through effective management, motivation and support.

3.27 The Capability policy provides the framework to enable the Council to establish a high-performance work environment where people are enabled to do their best, and where underperformance is challenged and addressed. It provides clear, fair, objective and consistent methods to address poor performance issues through appropriate training, mentoring, coaching and other developmental opportunities.

3.28 Colleagues are responsible for:

- Ensuring their performance meets the best possible standards, consistent with the Council's Behaviour Framework.
- Delivering the standards of performance customers can reasonably expect.
- Working with their line manager to identify methods to improve performance.
- Requesting training or other forms of support available and appropriate to their role, should they recognise they are having trouble meeting the required standards.

3.29 In all dealings with tenants, leaseholders, colleagues, partners and stakeholders, colleagues are expected to act:

- Professionally.
- Honestly.
- Respectfully.
- Fairly.
- Transparently.
- Accountably.

3.30 Line Managers are responsible for:

- Leading by example, by demonstrating appropriate performance standards.
- Ensuring their teams are aware of the required standards of performance and their teams are well managed and led, to meet or surpass these.
- Setting work-based objectives for their team members.
- Ensuring their colleagues have regular appraisals and a personal development plan in place to support their continuous development.
- Providing adequate and relevant coaching and training intervention to allow employees to carry out their duties effectively.
- Ensuring unsatisfactory performance is dealt with in accordance with the policy and procedure.
- Demonstrating behaviours consistent with the Behaviour Framework.

3.31 Housing colleagues will receive two Personal Development Reviews (PDR) a year, and a minimum of six 1-2-1 sessions. These will be regular opportunities to review the colleague's skills, knowledge and experience, and ensure they are exhibiting the behaviours needed for the Council's landlord services to be of good quality.

3.32 In the event of consistent poor performance, the Council's Capability Policy (HRP 017) will apply.

3.33 If colleagues fail to address poor performance or are found to have committed misconduct or serious misconduct, the Council's Disciplinary Policy (HRP 028) will be applied.

4 Code of conduct

4.1 Swindon Borough Council has a Code of Conduct that applies to all colleagues, including

those working in social housing.

- 4.2 In addition to the corporate Code of Conduct, all Housing colleagues are also required to sign up to the Housing Code of Conduct.
- 4.3 The Housing Code of Conduct has been co-produced with tenants and leaseholders and focusses on the specific expectations around the management of the Council's homes. All colleagues joining the Council and working on any housing revenue account activity are required to sign up to the Housing Code of Conduct as part of the induction process.
- 4.4 All relevant Council colleagues already employed at the launch of the Code of Conduct in late 2026 will be asked to sign up and a copy held on their HR records.
- 4.5 Examples of conduct that falls below expected standards:
 - Failing to treat customers with dignity and respect.
 - Ignoring or dismissing customer concerns.
 - Providing inaccurate or misleading information.
 - Failing to follow policies, procedures or regulatory requirements.
 - Demonstrating discriminatory, bullying, intimidating or inappropriate behaviour.
 - Breaching confidentiality or information governance requirements.
 - Failing to maintain required qualifications, training or professional competence.
 - Behaving in a way that brings the Council or the housing profession into disrepute.
- 4.6 The Council will maintain assurance through:
 - Internal quality assurance reviews.
 - Professionalisation compliance monitoring.
 - Workforce audits.
 - Internal audit activity.
 - Regulatory self-assessment.
 - Governance reporting.

5 Monitoring and review

- 5.1 This policy will be reviewed to ensure it remains up-to-date and fit for purpose, every two years or sooner if legislation or regulations change.