Competence & Conduct Policy

Version 1

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You are advised that a printed version may not be the latest available version. The latest version, which supersedes all previous versions, is available on the Brighter Places Policy Index Sheet. Those to whom this policy applies, are responsible for familiarising themselves with the latest version and for always complying with the policy requirements.

Should colleagues require any reasonable adjustment to allow for engagement with this document please contact the policy lead

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1. Policy Statement / Purpose

Brighter Places is committed to delivering safe, respectful, high-quality housing services that place customers at the centre of everything we do. We recognise that this depends on colleagues having the appropriate competence, professionalism and conduct to carry out their roles effectively.

This policy sets out Brighter Places' approach to meeting the Regulator of Social Housing's Competence and Conduct Standard, introduced under the Social Housing (Regulation) Act 2023 and effective from October 2026. It also explains how the principles and expected behaviours in the NHF Code of Conduct 2026, as adopted and adapted by Brighter Places, are embedded in recruitment, induction, competence assessment, performance management, learning and development, and assurance.

The policy confirms how Brighter Places will:

- Develop and maintain colleague competence.
- Promote high standards of professional conduct aligned to the NHF 2026 Code of Conduct which Brighter Places has adopted.
- Meet the requirements of the Regulator of Social Housing's Competence and Conduct Standard.
- Ensure learning and development is embedded throughout employment.
- Identify and address competence or conduct concerns.
- Involve customers in shaping and reviewing our approach

The purpose of this policy is to:

- Define what competence and professional conduct means at Brighter Places
- Set out how competence will be assessed, monitored and developed
- Ensure compliance with the Competence and Conduct Standard
- Protect customers by maintaining professional, skilled and accountable services

Brighter Places recognises that failure to align recruitment, performance and reward to the Competence & Conduct Standard may result in regulatory, performance and organisational risk.

2. Scope

This policy applies to all Brighter Places colleagues; agency workers and temporary staff; contractors, consultants and service providers delivering landlord services on behalf of Brighter Places; and managers and leaders responsible for those services. The Brighter Places Code of Conduct may apply more widely to Board members and others who work for or represent Brighter Places, as specified in that Code. Nothing in this policy narrows the scope of the Code of Conduct.

- All Brighter Places colleagues
- Agency workers, contractors and temporary staff
- Contractors and consultants where they provide landlord services on behalf of Brighter Places.
- Managers and leaders with responsibility for landlord services.

For the purposes of this policy, landlord services include any service connected with the management of social housing. Colleague is used as the umbrella term for all those in scope unless otherwise stated.

3. Linked Documents

- Recruitment & Selection Policy
- Performance at Work Policy
- Health and Safety Policy
- Complaints Policy
- Reward Policy
- Learning & Development Policy
- Code of Conduct Policy and guidance
- Disciplinary Policy
- Equity, Diversity & Inclusion Policy
- Data Protection Policy
- Governance Framework

4. Legal and Regulatory Compliance

This policy and the Brighter Places Code of Conduct are complementary. This policy explains how competence and conduct expectations are embedded, assessed, monitored and assured. The Code of Conduct sets out the behaviours expected of individuals. Where a conduct concern arises, it will be considered against the Code

of Conduct and managed under the appropriate employment, performance or disciplinary procedure.

This policy supports compliance with:

- Social Housing (Regulation) Act 2023
- Regulator of Social Housing: Competence and Conduct Standard
- Housing and Regeneration Act 2008
- Equality Act 2010
- Brighter Places Code of Conduct

The policy also reflects lessons learned from sector-wide failings, including the Grenfell Tower Inquiry and the death of Awaab Ishak, which highlighted the impact of poor culture, inadequate skills, and failures to listen to customers.

5. Responsibilities

Board

- Address escalations where matters present significant regulatory, reputational, resident safety or service quality risk.

People and Governance Committee

- Receive annual assurance on compliance with this policy and the Competence and Conduct Standard.
- Scrutinise strategic risks linked to competence, conduct, qualifications, service provider assurance and resident impact.
- Review material non-compliance, exception reports and agreed improvement actions.
- Recommend escalation to Board where matters present significant regulatory, reputational, resident safety or service quality risk.

Executive Team

- Own overall implementation of this policy and ensure it is embedded across relevant services.
- Ensure sufficient resources, systems and learning budgets are available to meet competence and qualification requirements.
- Receive and review annual compliance reports, including qualification progress, competence assessment outcomes, exceptions and service provider assurance.

- Ensure material risks, non-compliance, resident safety concerns or service quality issues are escalated promptly to the People and Governance Committee or Board as appropriate.
- Oversee delivery of improvement actions where gaps are identified.

HR Team

- Maintain the qualification register and associated colleague records.
- Coordinate the identification and review of roles subject to mandatory qualification requirements.
- Advise managers and colleagues on competence, conduct, qualification and learning requirements.
- Support recruitment, appointment, promotion and onboarding processes to reflect competence and conduct expectations.
- Monitor qualification progress, CPD evidence and completion of agreed development plans.
- Produce compliance reports for the Executive Team and assurance information for the People and Governance Committee.
- Maintain evidence in line with data protection and retention requirements.

Line Managers

Line managers are responsible for holding regular, meaningful one-to-ones with colleagues and using Performance Hub to record objectives, development needs, feedback, agreed actions and progress. These conversations should support colleagues to feel confident and competent in their roles, ensure expectations are understood, and provide ongoing evidence of how competence, conduct and professional development are being maintained in line with the Competence and Conduct Standard.by:

- Identifying competence, conduct, training and qualification requirements within their teams.
- Ensure colleagues understand the standards expected of them and how these apply to their role.
- Complete evidence-based competence assessments during probation, annually and where concerns arise.
- Support colleagues undertaking qualifications, CPD or development activity and monitor agreed progress.
- Address competence, conduct or performance concerns promptly and proportionately, including putting safeguards in place where resident safety or service quality may be affected.
- Escalate red-rated assessments, unresolved disputes, qualification delays, non-compliance risks and service quality concerns to the People Team and senior management.

- Ensure resident feedback, complaints, incidents and lessons learned are considered when reviewing competence and development needs.

Colleagues

Colleagues must take responsibility for preparing for and actively participating in regular one-to-ones, appraisals and development discussions, including using Performance Hub to record progress, evidence of competence, agreed objectives, development needs and actions. Colleagues are expected to engage honestly and proactively in these conversations to support their own confidence, competence and professional development in line with the Competence and Conduct Standard. Responsibilities are:

- Understand and comply with this policy, the Code of Conduct and role-specific competence requirements.
- Complete mandatory learning agreed qualifications and CPD within required timescales.
- Maintain and provide evidence of learning, competence, qualifications and professional development when requested.
- Participate honestly in competence assessments, one-to-ones, appraisal and development planning.
- Apply learning in day-to-day work and demonstrate expected behaviours when working with customers, colleagues and partners.
- Notify their manager promptly of any barriers, support needs or issues that may affect competence, conduct, qualification completion or service delivery.
- Challenge and report concerns where professional standards, resident safety, safeguarding, equality or service quality may be affected.
- Manage the compliance with the contract register to include service provider and contractor evidence

Governance Team

- Support the governance route for policy approval, reporting and assurance.
- Maintain version control and ensure approved policies are published and accessible through the correct channels.
- Advise on committee and Board reporting requirements, including the distinction between assurance, decision and exception reporting.
- Ensure governance records clearly evidence review, approval, escalation and assurance activity.

- Monitor alignment between this policy and the Brighter Places Code of Conduct, based on the NHF Code of Conduct 2026, including changes to the Code, evidence of implementation, identified gaps and required policy updates.
- Ensure any Internal Audits are planned into future Internal Audit Needs Assessments

Service Providers and Contractors

- Demonstrate that colleagues delivering landlord services on behalf of Brighter Places have appropriate competence, training, supervision and qualifications where required.
- Provide evidence of qualification status, training records, competence frameworks and workforce development plans when requested.
- Comply with relevant contract requirements, professional standards, safeguarding, health and safety and resident service expectations.
- Notify Brighter Places promptly of any material competence, conduct, resourcing or compliance issues that may affect service delivery or customers.

6. Policy Detail

6.1. Principles

In line with the Competence and Conduct Standard and the Brighter Places Code of Conduct, which is based on the NHF Code of Conduct 2026, this policy is underpinned by five conduct principles: acting in the best interests of customers and Brighter Places; behaving with integrity; treating others fairly, with respect and empathy; taking responsibility for the impact of actions and decisions; and acting with diligence and care. The supporting principles of continuous learning, inclusion and resident focus explain how these expectations are applied through this policy.

Professionalism

- Ensure colleagues act professionally, ethically and with integrity at all times.

Respect

- Treat customers, colleagues and stakeholders with dignity, fairness and respect.

Accountability

- Take responsibility for actions, decisions and service outcomes.

Learning

- Promote continuous learning and professional development.

Inclusion

- Ensure everyone has equitable access to learning and development opportunities.

Resident Focus

- Put customers at the heart of decision making and service delivery.

6.2. Competence

At Brighter Places, competence is not limited to qualifications alone. It is the combination of knowledge, skills, experience and behaviours that enables colleagues to carry out their role effectively and professionally.

Knowledge

To be competent to provide effective services for customers Brighter Places colleagues must, have knowledge of:

- Housing law and Regulation
- Brighter Places policies and procedures
- Safeguarding and health & safety including building safety
- Equity, diversity and inclusion
- Customer and resident rights
- Customer Involvement and engagement

The level of knowledge required will be dependent on the role and responsibilities assigned to the role individuals hold. Colleagues will also be required to have or develop sufficient technical knowledge of their functional area relevant to the role that they undertake.

Skills

To be competent to perform their duties all colleagues must have the skills to be able to:

- Communicate clearly and respectfully
- Make decisions that are fair and evidence-based
- Solve problems effectively
- Work collaboratively with customers and colleagues
- Manage risk that arises
- Deal with feedback and complaints

Colleagues will also be required to hold technical skills in relation to the specific role and responsibilities that they hold.

Experience

To be competent to perform their duties all colleagues must be able to apply knowledge and skills gained through practical work experience and apply professional judgement.

Behaviours

All colleagues are expected to behave at all times in accordance with Brighter Places' values, cultural framework and Code of Conduct. This includes acting in the best interests of customers and Brighter Places, behaving with integrity, treating others fairly with respect and empathy, taking responsibility for the impact of actions and decisions, and acting with diligence and care.

- Acting with integrity and professionalism
- Treating customers with empathy, dignity, respect and compassion
- Listening to customers and taking concerns seriously
- Acting without bias or discrimination
- Being accountable for decisions and actions
- Commitment to continuous development and professional curiosity

Act with appropriate diligence and care by preparing properly, keeping accurate records, following through on commitments, seeking advice when needed and escalating risks or concerns without delay.

6.3. Methods for gaining competence

The knowledge, skills and behaviour required to be competent can be gathered from multiple sources including but not limited to:

- Induction and role-specific training, including mandatory learning, policies, procedures and regulatory requirements.
- Professional qualifications, accredited learning and apprenticeships where these are required or relevant to the role.
- Continuous professional development, including refresher training, workshops, webinars, sector updates and self-directed learning.
- On-the-job learning, supervised practice, shadowing, secondments, project work and applying learning in day-to-day service delivery.
- Coaching, mentoring and peer learning to share experience, build confidence and support consistent decision-making.

- Regular one-to-one meetings, performance reviews and objective setting to identify strengths, development needs and agreed actions.
- Using feedback from customers, colleagues, managers and partner organisations to understand service impact and improve behaviour and practice.
- Reflective learning on complaints, compliments, incidents, safeguarding concerns, lessons learned and service reviews to improve professional judgement.
- Team meetings, case discussions and quality assurance activity to build shared understanding and consistent standards.
- Accessing guidance from managers, subject matter experts, professional bodies and internal policies when dealing with complex or unfamiliar issues.
- Demonstrating Brighter Places' values and code of conduct in everyday interactions, including respectful communication, accountability and resident-focused decision-making.

This holistic approach to learning is defined as continuous personal development and all colleagues are expected to undertake and maintain evidence of continuous personal development to allow for assessment of competence.

6.4. Assessing competence

Brighter Places operates a Competence Assessment Framework to evidence compliance with the standard and identify development needs.

6.4.1 Defining Competence Requirements

Each role at brighter places is assessed to establish the requirements for each of the following to be competent:

- Knowledge
- Skills
- Experience
- Qualifications
- Behaviours

The required level of competency will depend on level and duties / responsibilities of the role as well as any legislative qualification requirements.

6.4.2 Assessing Competence

Competence assessments will be undertaken:

- as part of probation
- at least annually

These will be jointly completed by both colleagues and the line manager and will be evidence-based reviews.

Colleagues are responsible for providing evidence of competence and maintaining a log of all continuous professional development undertaken.

Competence assessments will include a review of each of the required knowledge, skills, experience and behaviour requirements and assessing the level of competence based on the table below:

Rating	Description
Green	Fully competent – consistently meets expectations
Amber	Developing – some gaps identified
Red	Not yet competent – significant gaps identified

Decisions as to why a colleague is competent or has gaps should be evidence based. Where the colleague and a line manager dispute whether a colleague reaches the competent threshold, these should be noted and a senior manager / exec member will make the final decision.

6.4.3 Development and Support

Where competence gaps are identified, Brighter Places will:

- Agree a development plan
- Provide access to training, mentoring or qualifications
- Make reasonable adjustments where required

The emphasis will be on support and improvement, not punitive action, unless resident safety is involved.

6.4.4 Managing Competence Concerns

Where competence concerns are identified, particularly those that effect resident or colleague safety Brighter Places will:

- Discuss concerns promptly.
- Ensure appropriate safeguards will be put in place. Resident safety and service quality will always be the priority.

- Identify underlying causes.
- Provide support and development.
- Agree improvement actions.
- Monitor progress.

Appropriate support may include:

- Additional training.
- Coaching.
- Mentoring.
- Supervision.
- Work shadowing.
- Adjustments where appropriate.

Where improvement is not achieved, formal performance management processes may be used in line with the performance at work policy.

6.5. Regulatory Required Qualifications

Brighter Places will ensure compliance with its statutory qualification requirements applicable to senior housing managers and senior housing executives.

Under the competence and conduct standard there are roles defined as “relevant persons” who are required to hold specific housing management qualifications at a defined level. These qualifications must meet the content, type of qualification and level as set out in the standard.

Colleagues within roles defined as being a relevant must be either:

- Qualified to the correct level
- Working towards completing the qualification or a lower qualification that is a pre-requisite to completing the required qualification

Where qualifications are required:

- Appropriate qualification pathways will be identified.
- Progress will be monitored.
- Support will be provided to help colleagues achieve required qualifications within regulatory timescales.
- Records will be maintained to demonstrate compliance.

Definitions

The standard contains specific definitions relating to roles and qualifications that must be held. The full details can be found in on the gov.uk website **here.** For the purposes of this policy, the following definitions apply:

Senior Housing Manager

A Senior Housing Manager is a colleague who has a substantive role in the operational management, oversight, quality or safety of housing management services delivered to Brighter Places residents.

A colleague will normally be considered a Senior Housing Manager where they:

- have responsibility and sufficient autonomy to make decisions about the operational management, quality, safety, performance or improvement of one or more housing management services;
- manage or oversee the direct delivery of services to residents, rather than solely carrying out frontline work or administering processes;
- influence or make decisions about service standards, procedures, resource deployment, risk controls or changes to service delivery;
- monitor service quality, safety, outcomes or performance and take action where concerns or deficiencies are identified; and
- spend the majority of their working time managing the delivery of housing management services, or where this responsibility is otherwise an important and substantial part of their role.
- Relevant services may include customer services, complaints, resident involvement, allocations and lettings, tenancy or licence management, income management, anti-social behaviour, repairs and maintenance, asset management, building and fire safety, estate management, and capital or major works within occupied buildings.

This list is not exhaustive.

Senior Housing Executive

A Senior Housing Executive is a member of Brighter Places' leadership who has sole or joint responsibility for the management of housing management services and plays a significant role in deciding how the whole, or a substantial part, of those services is managed or organised.

A colleague will normally be considered a Senior Housing Executive where they:

- provide strategic direction and hold senior accountability for the delivery, quality, safety or continuous improvement of housing management services;
- have day-to-day executive responsibility for all housing management services or for a specific and substantial part of them;
- play a significant role in decisions about how those services are structured, led, resourced, controlled or improved;

- are accountable for strategies and arrangements to manage service performance and risk;
- are accountable for ensuring accessible, resident-focused policies and procedures are in place; and
- influence and embed organisational culture, professional standards and expectations relating to the delivery of housing services.

Approved Qualification

A qualification recognised by government policy statement as meeting the requirements of the Competence and Conduct Standard.

Identifying Roles Subject to Qualification Requirements

The People Team will maintain a register of positions that are subject to mandatory qualification requirements. Roles within scope are senior housing executives and senior housing managers deemed “relevant persons” whose primary duties involve housing management activities, generally where this accounts for more than 50% of their role.

The register will include:

- Job title
- Directorate
- Role holder
- Date appointed
- Qualification required
- Existing qualification status
- Compliance deadline
- Start date of training) if required
- Expected completion date (if required)
- Current status

The register will be reviewed bi-annually and whenever organisational structures change.

Qualification Requirements

Senior Housing Managers - Must hold, or be working towards, a Level 4 regulated housing qualification, covering:

- Professional practice
- Equality, diversity and inclusion
- Customer service
- National housing policy

Senior Housing Executives - Must hold, or be working towards, a Level 5 regulated housing qualification, covering:

- All Level 4 content
- Leadership and management
- Stakeholder engagement

Pre-Appointment Checks

Where a role falls within the scope of mandatory qualification requirements:

Recruitment

Recruitment documentation will:

- Specify qualification requirements.
- State whether applicants must already hold a qualification or may work towards one.
- Explain any regulatory obligations.

Verification

Prior to appointment, the HR Team will:

- Verify qualifications claimed by applicants.
- Obtain copies of certificates.
- Assess whether existing qualifications satisfy regulatory requirements.

Copies of verified qualifications will be retained on the colleague's personnel file.

Learning and Qualification Plans

Where qualifications are required, an individual Qualification Development Plan will be created by the line manager with support where required from the HR team.

The plan will include:

- Qualification pathway.
- Provider.
- Start date.
- Target completion date.
- Study commitments.
- Organisational support arrangements.
- Progress

Plans will form part of annual performance and development discussions.

Organisational Support

To support qualification achievement Brighter Places provides:

- Course fees
- Appropriate study leave
- Protected learning time
- Coaching and mentoring
- Peer learning opportunities
- Access to professional networks

Support arrangements will be determined in accordance with organisational learning and development budgets and policies.

Evidence and Record Keeping

Colleagues are responsible for ensuring that the following evidence if provided to HR and will be maintained in colleague personnel files:

- Qualification certificates.
- Enrolment confirmations.
- Qualification transcripts.
- Progress reports.
- Continuing Professional Development records.
- Membership of professional bodies where applicable.
- Correspondence relating to qualification compliance.

Records will be retained in accordance with data retention requirements.

Managing Non-Compliance

A colleague may be considered at risk of non-compliance where they:

- Fail to enrol onto an agreed programme.
- Withdraw from study without approval.
- Fail to engage with required learning activities.
- Do not achieve qualification requirements within agreed timelines.

Where this occurs line managers will:

Stage 1: Support

- Discuss barriers.
- Review workload.
- Consider reasonable adjustments.
- Agree additional support.

Stage 2: Formal Improvement Plan

Where concerns continue:

- A formal improvement plan may be implemented.
- Review milestones will be established.
- Additional monitoring will be undertaken.

Stage 3: Escalation

Persistent failure to comply may be managed through relevant organisational procedures where qualification achievement is an essential requirement of the role.

Each case will be considered individually and proportionately.

New Appointments and Internal Promotions

Where an employee is appointed to a role requiring a mandatory qualification but does not currently hold one:

- Qualification requirements will be confirmed in writing as part of confirmation of employment.
- A qualification plan will be agreed within three months of appointment.
- Progress will be monitored through regular review / probation meetings.

Exemptions and Exceptional Circumstances

There may be occasions defined as exceptional circumstances that allow for adjustments to the requirement to complete a relevant qualification and may include but are not limited to:

- Long-term sickness absence.
- Maternity, adoption or shared parental leave.
- Reasonable adjustment requirements.
- Significant personal circumstances.

Any extensions or alternative arrangements must be approved by the Director of People or the CEO and documented.

6.6. Standards of Professional Conduct

All colleagues must comply with this policy and the required standards of professional conduct set out in the Brighter Places code of conduct and in line with our values and cultural framework. All colleagues are expected to:

Customers

- Listen to customers and take concerns seriously.
- Treat customers fairly and respectfully.
- Communicate clearly and honestly.
- Deliver commitments wherever possible.
- Learn from feedback and complaints.

Professional Behaviour

- Act honestly and ethically.
- Follow policies and procedures.
- Maintain confidentiality.
- Declare conflicts of interest.
- Challenge unacceptable behaviour.
- Escalate concerns where appropriate.

Working Relationships

- Promote inclusion and belonging.
- Treat colleagues respectfully.
- Support teamwork and collaboration.
- Value different perspectives.

Safety and Compliance

- Prioritise health and safety.
- Report risks, hazards and compliance concerns.
- Complete required training.
- Follow safeguarding responsibilities.

Colleague conduct will be discussed at 1-2-1's and as part of the annual appraisal and competency assessments.

Unacceptable conduct will be addressed through performance management or disciplinary procedures where appropriate in line with the relevant policy.

6.7. Recruitment and Appointment

Competence and conduct requirements will be embedded at the point of recruitment to ensure colleagues are appointed with the appropriate **skills, knowledge and behaviours** to perform their role safely and effectively.

The Code of Conduct will form part of induction and role-specific onboarding. Colleagues will be given access to the current Code, supported to understand how it applies to their role and required to confirm that they have read and understood it. Refresher activity will be provided when the Code or related guidance changes and where monitoring identifies a need.

Recruitment and selection processes will:

- Be aligned to the Competence & Conduct framework
- Use role-specific competency and behaviour criteria
- Assess professional values and expected standards of conduct
- Verify qualifications and experience where required
- Set clear expectations of professional competence and conduct from the outset
- Be explicit in what professional qualification is required if applicable and where not already obtained specify the expectations for achieving the qualification

Brighter Places recognises recruitment as a critical control in preventing future competence, performance and conduct issues. Appointing colleagues who do not or are not prepared to meet competence and conduct expectations creates organisational and regulatory risk and may result in avoidable performance or conduct concerns.

6.8. Service Providers

A Service Provider means any external organisation, company, partnership, consultant, contractor, managing agent, sole trader or other person engaged by Brighter Places to who deliver, manage, support or supervise all or the majority of landlord services, whether directly or through subcontracting arrangements.

A majority of their time would be defined as spending more than 50% of their working hours managing delivery of Landlord Services for Brighter Places.

For the purposes of this policy, landlord services include any service connected with the management of social housing, including but not limited to:

- repairs and maintenance;
- asset management and building safety;
- tenancy and neighbourhood management;

- customer services and complaint handling;
- lettings and allocations;
- income collection and arrears management;
- resident engagement;
- compliance, inspections and surveying services;
- estate management;
- any other activity undertaken on behalf of Brighter Places that contributes to the delivery of services to customers

This definition includes organisations that employ staff, managers or subcontractors who interact with customers, make decisions affecting customers, manage homes or buildings, undertake inspections or assessments, or otherwise contribute to the delivery of landlord services.

Brighter Places will take appropriate steps to ensure that the relevant staff of contractors, managing agents and other service providers have, and maintain, the skills, knowledge, experience and behaviours required to deliver high-quality landlord services in accordance with the Competence and Conduct Standard.

A register will be maintained of all service providers with evidence of the assurance provided to demonstrate compliance with the standard. A record of assurance to compliance will be maintained with actions in place for those that do not provide sufficient assurance. This information will be reviewed at least annually to ensure it remains valid or where an incident or change requires further review.

Brighter Places will embed service provider assurance into contract management and procurement processes to ensure that competence, conduct and compliance expectations are clearly defined, evidenced, monitored and reviewed throughout the life of the contract. This will include:

- Clear contract requirements setting out the competence, conduct, training, supervision, qualification and safeguarding expectations for service providers and any subcontractors delivering landlord services on behalf of Brighter Places.
- Ensure procurement exercises assess a provider's ability to meet the Competence and Conduct Standard, including consideration of relevant experience, workforce capability, professional standards, training arrangements, supervision, quality assurance and previous performance.
- Use contract review meetings to seek assurance that service providers continue to meet agreed competence and conduct requirements, including reviewing any changes to staffing, subcontracting arrangements, training completion, qualification status, complaints, customer feedback, incidents or service quality concerns.
- Request and review appropriate evidence from service providers at agreed intervals, which may include training records, qualification evidence,

competence frameworks, supervision arrangements, professional registrations, policies, audit findings, improvement plans and evidence of how concerns are identified and addressed.

- Use performance monitoring arrangements to assess whether service providers are delivering landlord services safely, professionally and consistently, including monitoring customer outcomes, complaints, service failures, safeguarding concerns, health and safety issues, contract performance indicators and any themes that may indicate competence or conduct risks.
- Require service providers to notify Brighter Places promptly of any material competence, conduct, staffing, training, qualification, safeguarding, compliance or service delivery issue that could affect customers, service quality, regulatory compliance or Brighter Places' reputation.
- Record assurance outcomes, evidence received, gaps identified, improvement actions and escalation decisions within the service provider register so that compliance can be monitored and reported through the appropriate governance routes.

6.9. Link to Performance and Reward

Professional conduct and competence expectations apply throughout employment and are reinforced through performance management and reward processes. Performance appraisals will take into consideration both conduct and competence of colleagues and will:

- Inform performance reviews and objectives
- Be considered when making decisions about progression, pay progression and reward
- Be reviewed where concerns arise relating to performance or behaviour

Sustained professional conduct and competence are expected to support positive performance outcomes. Where significant or ongoing concerns are identified, these may impact performance ratings, progression or reward, and may be addressed through appropriate management procedures.

6.10. Reporting and Assurance

Assurance reporting of compliance with the standard will also be provided to the People and Governance Committee bi-annually and annually to the Executive Team.

Annual compliance reporting will also be provided and will include, as a minimum, qualification compliance, progress towards required qualifications, competence assessment outcomes, completion of Code of Conduct induction and refresher activity, and specifics set out below:

- Number of qualifying roles.
- Percentage compliant.
- Percentage working towards qualifications.
- Known compliance risks.
- Forecast regulatory compliance position.
- Exceptions
- Service provider assurance status

The resident scrutiny group will also receive annual reports for the purposes of facilitating meaningful scrutiny as set out in section 5.7.

6.11. Resident Scrutiny and Influence

Brighter Places recognises that customers have a vital role in shaping and scrutinising the standards of competence and conduct demonstrated by those delivering landlord services.

To support this commitment, Brighter Places will ensure that customers are provided with meaningful opportunities to influence, challenge and review the organisation's approach to competence and conduct. This will include:

- Consulting with customers on the developments relating to the Competence and Conduct Policy and associated Code of Conduct.
- Providing customers with accessible information about the standards of behaviour, professionalism and competence expected of colleagues and contractors delivering landlord services.
- Supporting resident scrutiny groups, panels or other resident engagement forums to review performance information relating to service quality, customer experience, complaints, learning and development, and compliance with competence and conduct requirements.
- Seeking resident feedback regarding the behaviours, professionalism and customer service standards demonstrated by colleagues and contractors.
- Considering resident feedback when reviewing training priorities, competency frameworks, learning programmes and service improvement initiatives.
- Reporting back to customers on actions taken in response to resident feedback, scrutiny findings and recommendations.
- Making the Competence and Conduct Policy and Code of Conduct publicly available and accessible to customers through appropriate channels.

Resident scrutiny activities will be undertaken in a manner that is transparent, inclusive and proportionate, ensuring that customers can meaningfully influence decision making while maintaining appropriate confidentiality and data protection requirements.

The Executive Team will ensure that the outcomes of resident scrutiny are considered as part of the organisation's assurance framework and will use resident insight to drive continuous improvement in the competence, professionalism and conduct of those delivering landlord services on behalf of Brighter Places. This reflects the requirement of the Competence and Conduct Standard to provide tenants with meaningful opportunities to influence and scrutinise both competence arrangements and codes of conduct.

7. Monitoring and Review

Brighter Places will:

- Maintain oversight of competence and qualification compliance
- Use workforce data to identify themes and risks
- Provide assurance to Senior Leadership Team and Board
- Review this policy regularly, and whenever the Competence and Conduct Standard, the NHF Code of Conduct 2026 or the Brighter Places Code of Conduct changes, to ensure that requirements remain aligned and are reflected in recruitment, learning, competence assessment, performance management, contractor assurance and reporting.

8. Data Protection

Any personal data created or used in the application of this policy must be done so in line with the Brighter Places data protection policy and privacy notices.

9. Equality, Diversity and Inclusion

Where required, reasonable adjustments will be considered to support colleagues or residents to engage with this policy. Please speak to the policy owner for assistance.

10. Summary Roles and Responsibilities

Activity	Board	CEO	PGC	ARC	Executive Team	Managers	All colleagues	People Team	Governance
Ownership and maintenance of the policy								✓	
Monitoring and review of the policy			✓		✓			✓	✓
Approval of material changes to the policy	✓		✓						
Strategic oversight of implementation		✓	✓		✓				
Implementation of policy requirements					✓	✓	✓	✓	
Identification and review of roles subject to mandatory qualification requirements					✓	✓		✓	
Maintenance of the qualification and compliance register						✓	✓	✓	
Completion of competence assessments						✓	✓		
Agreement and monitoring of development and qualification plans						✓	✓	✓	
Provision of learning,					✓	✓	✓	✓	

qualifications, CPD and appropriate support									
Identification and management of competence or conduct concerns					✓	✓	✓	✓	
Escalation of material regulatory, resident safety or service-quality risks	✓	✓	✓	✓	✓	✓		✓	✓
Service provider and contractor assurance			✓	✓	✓	✓		✓	✓
Monitoring of qualification, competence and service provider compliance			✓	✓	✓	✓		✓	✓
Reporting and assurance to the Executive Team					✓			✓	✓
Assurance reporting to PGC and Board	✓	✓	✓		✓			✓	✓
Resident scrutiny and consideration of resident feedback			✓		✓	✓		✓	✓
Version control, publication and accessibility of the approved policy								✓	✓
Familiarisation with and compliance with the policy					✓	✓	✓	✓	✓

TRANSLATIONS

If English is not your first language and you need a translation, we can get one for you.

ALBANIAN

Nëse anglishtja nuk është gjuha juaj amtare dhe keni nevojë për një përkthim, ne mund t'ua sigurojmë atë.

BENGALI

ইংরেজী আপনার মাতৃভাষা না হলে এবং আপনার কোন অনুবাদের প্রয়োজন হলে আমরা তা প্রদান করতে সক্ষম।

CHINESE

如果英文不是您的第一語言，而您需要翻譯的話，我們可以爲您安排。

GUJARATI

જો તમારી પહેલી ભાષા અંગ્રેજી ન હોય અને તમને ભાષાંતરની જરૂર હોય તો અમે તમને તે આપી શકીએ છીએ.

HINDI

यदि अँग्रेज़ी आप की पहली भाषा नहीं है और आप को अनुवाद की आवश्यकता है तो यह हम आपको प्रदान कर सकते हैं

KURDISH

Heke îngilîzî zimanê we yê yekem nîne û pêwîstîya we bi wergêr heye, em dikarin yekî ji we re bibînin

POLISH

Jeżeli język angielski nie jest Twoim językiem ojczystym i wymagasz tłumaczenia, możemy to zapewnić.

PORTUGUESE

Se o Inglês não é a sua língua materna e precisa de uma tradução, nós podemos obtê-la.

PUNJABI

ਜੇਕਰ ਇੰਗਲਿਸ਼ ਤੁਹਾਡੀ ਪਹਿਲੀ ਭਾਸ਼ਾ ਨਹੀਂ ਅਤੇ ਤੁਹਾਨੂੰ ਦੁਭਾਸ਼ੀਏ ਦੀ ਜ਼ਰੂਰਤ ਹੈ ਤਾਂ ਤੁਹਾਡੇ ਲਈ ਅਸੀਂ ਇਸਦਾ ਪ੍ਰਬੰਧ ਕਰ ਸਕਦੇ ਹਾਂ।

SOMALI

Haddii Ingiriisku aanu ahayn afkaaga kowaad oo aad u baahan tahay turjumaad, annagaa kuu samayn karra.

URDU

اگر انگریزی آپ کی پہلی زبان نہیں ہے اور آپ کو ترجمہ کی ضرورت ہے تو ہم آپ کے لئے فراہم کر سکتے ہیں۔

VIETNAMESE

Nếu quí vị không thao Anh văn và cần bản dịch, chúng tôi sẽ giúp quí vị một bản.