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Housing

# What you need to know about the proposed Competence and Conduct Standard for social housing

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The government has published an eight-week [consultation](#) (closing on 2 April) on a direction to the Regulator of Social Housing to set a Competence and Conduct (C&C) Standard for social housing. This guide summarises what you need to know.

## Background

In the [Charter for Social Housing Residents](#) (2020) white paper the government committed to review professional training and development to ensure residents receive a high standard of customer service. The [Professionalisation Review](#), which concluded in Summer 2022 and which CIH fed into, found that changes were needed to drive up the professionalism of staff in the social housing sector.

The [Social Housing \(Regulation\) Act](#) 2023 introduced a range of measures to strengthen consumer regulation and to rebalance the relationship between landlord and resident. This included a new regulatory standard on staff competence and conduct, including a requirement for senior housing managers and senior housing executives to hold appropriate qualifications.

The proposals being consulted on seek to address the significant concerns raised following the Grenfell tragedy about the professionalism of staff working in social housing, and subsequent concerns raised following the tragic death of Awaab Ishak as a result of extensive mould in his social housing flat.

The proposed Standard is part of a wider series of reforms being introduced to ensure tenants have safe and decent homes, receive high quality services, are treated with fairness and respect, and have a strong voice.

## Scope

The direction will set a standard for registered providers in England regarding the C&C of individuals “involved in the provision of services connected with the management of social housing”.

“Registered provider” includes private registered providers (housing associations) and local authority registered providers (that provide social housing).

“Relevant Persons” is used as shorthand for registered providers senior housing managers and senior housing executives who are in scope and will need to gain a relevant qualification. “Relevant SP Managers” is used for service providers.

## Overview

The draft [direction to the Regulator](#) specifies that the C&C Standard must **require registered providers of social housing to ensure that “all staff involved in the provision of services in connection with the management of social housing have the skills, knowledge, and experience and exhibit the behaviours needed to deliver a good quality service”**. Whilst the Standard will only apply directly to registered providers, they will be required to take steps to **ensure that service providers also have the necessary skills, knowledge and experience, and exhibit the right behaviours**.

The draft direction specifies that **the Standard must require registered providers to:**

- **Have an up-to-date written policy** setting out their approach to managing and developing the skills, knowledge, experience and conduct of staff who are relevant individuals (see glossary of terms (chapter 7) within the [policy statement](#) for definitions); and
- **Adopt or develop an appropriate code of conduct for relevant staff** and ensure this is embedded in the organisation.

The draft [policy statement](#) sets out detailed information about the roles and qualifications in scope, time limits for staff to begin working towards qualifications, a transition period before requirements come into force, and some flexibilities and exemptions which will apply in limited circumstances.

As a rule, the qualification element of the C&C Standard applies in relation to service providers in the same way as to registered providers, with a few minor exceptions, e.g. sole traders.

The consultation is presented in sections:

- **[Section 1: The broad \(outcome-focussed\) Standard relating to the competence and conduct of all social housing staff.](#)** This is focussed on driving culture change and includes requirements for registered providers to have up to date written policies setting out their approach to managing and developing the skills, knowledge, experience and conduct of their staff, and to adopt and embed codes of conduct. Not prescriptive.
- **[Section 2: Scope of the qualification element of the Competence and Conduct Standard.](#)** Sets out the proposal that those in scope must spend a significant portion of their time exercising their responsibilities for housing management services. It seeks views on whether the guidance on the functions of roles in scope is sufficiently clear.
- **[Section 3: Criteria that qualifications must meet.](#)** Sets out proposals on the level and type of qualifications required, and the course content that must be covered.
- **[Section 4: What constitutes 'working towards' a qualification for the staff of registered and service providers.](#)** Sets out proposals on enrolment and completion of qualifications, and flexibilities to accommodate exceptional circumstances.
- **[Section 5: Transition period.](#)** Sets out proposals for a two-year transition period during which Relevant Persons and Relevant SP Managers must begin working towards qualifications, with adjusted time periods for smaller providers.

- **[Section 6: Transitional arrangements for partially compliant qualifications and apprenticeships.](#)** Sets out proposals for adjusted qualification requirements, which would apply during the transition period only, to those who have qualifications which partially meet the qualification requirement or have undertaken apprenticeships without a qualification element.
- **[Section 7: Requirements for registered providers in respect of the relevant managers of service providers.](#)** Sets out what registered providers must do to bring the qualification requirement to the attention of their service providers and take steps to secure they are aware of their obligations under the implied terms.

## The detail

### Section 1 - The broad Standard for all social housing staff

The Standard will require registered providers to have a written policy setting out their approach to managing and developing the skills, knowledge, experience and conduct of relevant staff, and the steps they will take to ensure compliance for relevant service provider staff.

Registered providers will be expected to update their written policy regularly. This must:

- a) Ensure the approach to managing and developing the skills, knowledge, experience and conduct of those of relevant staff is tailored to their different roles within the organisation
- b) Set out the approach to learning and development including how it will ensure relevant staff maintain and demonstrate appropriate and up-to-date skills, knowledge, experience and behaviours for their roles
- c) Set out the approach to regularly reviewing the performance of relevant staff and to managing poor performance.

Registered providers will be required to adopt or develop an appropriate code of conduct for relevant staff and ensure this is embedded in the organisation.

Relevant knowledge will vary depending on particular roles and responsibilities, e.g. for repairs and maintenance staff it could include good practice guidance issued by the Housing Ombudsman Service and the government's [guidance on damp and mould](#). The outcomes focused standard will apply to all staff involved in the provision of housing management services and will not be subject to a transition period

## Section 2: Who is in scope for qualifications?

It is proposed that a Relevant Person and Relevant SP Manager will be someone with a **substantive role who spends a significant proportion of time managing delivery of housing management services** to the registered providers social housing tenants.

'Housing management services' includes the management of sheltered and supported housing but does not include the delivery of care and support, e.g. personal care provided to a resident in supported housing. This means any staff who only have managerial responsibilities relating to the delivery of care and support to tenants would not be required to gain a relevant qualification. However, where a person manages care and support but also has a substantive role in managing delivery of housing management services, they would still be in scope.

In general, registered providers will be expected to ensure relevant staff have or are working towards a relevant qualification. They will also be required to take steps to ensure this applies to Relevant SP Managers of their service providers. These requirements are subject to certain exemptions\*.

A senior housing executive or senior housing manager in a registered provider will be classified as in scope if:

- a) They have a substantive role in managing delivery of housing management services to the registered providers' social housing tenants
- b) They are not an unpaid volunteer (e.g in Almshouses, smaller TMOs and housing co-operatives)

- c) They have been in their current role as a senior housing manager or senior housing executive for six months+
- d) There is/was a probation period applicable to their current role and nine months has elapsed since they began it
- e) They are not deemed to hold, or be working towards, a relevant qualification
- f) No exemption applies.

For service providers, a senior housing executive, senior housing manager, or individual that is a service provider will be considered in scope if they are a Relevant Manager of a service provider and have a substantive role in managing delivery of housing management services to social housing tenants. The same criteria applies as above (a-f).

**Senior housing managers** - The functions deemed to be in scope are listed, rather than job titles/roles. It is suggested that senior housing managers will usually manage the direct delivery of housing management services to tenants, for example:

- Customer services management
- Complaints management
- Tenant / resident involvement or empowerment
- Lettings management
- Tenancy management
- Income management
- Repairs and maintenance
- Asset management
- Anti-social behaviour management
- Estate management
- Capital/major works.

The policy statement clarifies that in a reporting chain, senior housing managers will usually be the tier below the senior housing executive but recognises that in larger organisations with several management levels, the requirements may not apply to roles who directly line manage frontline teams but to the level of management above. For an individual who is a service provider, the listed functions above also apply, depending on the level of seniority of the individual.

**Senior housing executives** – These will usually be Heads of Services and Directors who provide strategic direction and have accountability for housing management services. The following functions would be considered in scope (not an exhaustive list):

- Overall strategic direction and accountability in relation to service quality
- Accountability for developing and embedding their organisation’s culture in line with strategic objectives
- Accountability for ensuring implementation of strategies to manage and improve performance
- Accountability for ensuring accessible and customer-focused policies and procedures in place.

The definition of senior housing executive will capture the CEO if they have responsibility (solely or jointly) for the day-to-day management of delivery of housing management services. For an individual who is a service provider, the listed functions will also apply, depending on seniority.

### **Managing contracts delivered by service providers**

Where a registered provider contracts out housing management services to a service provider(s) they may still have their own senior housing manager(s) and/or senior housing executive(s) in scope. This would be the case when they have responsibility (solely or jointly) for the day-to-day management and oversight of contracts with service providers or for the quality of housing management services provided.

### **Out of scope**

An exemption applies in relation to back-office managerial roles who do not deliver functions which involve the management of direct delivery of services to tenants (e.g those in finance teams whose functions include the processing of direct debits, housing benefit/universal credit payments and accounting). Functions relating to the assessment of housing need, e.g. in a local authority which solely oversees the housing register or makes statutory decisions on homelessness would not be in scope as these functions are not considered housing management services.

## **Section 3: Criteria for qualifications**

Senior housing managers and executives of registered and service providers must undertake qualifications which meet the criteria set out in the policy statement. In summary:

- For senior housing managers (and individuals who are service providers) - a Level 4 qualification. Higher level qualifications which meet the criteria set out below will also meet the requirement
- For senior housing executives - a foundation degree or Level 5 qualification. A higher-level qualification which meets the criteria is also acceptable.

A higher-level qualification means a qualification in housing management that is:

- An Ofqual-regulated qualification higher than Level 4 for a senior housing manager or individual who is a service provider or higher than Level 5 for a senior housing executive
- A foundation degree for a senior housing manager or individual who is a service provider
- An undergraduate or postgraduate degree.

The higher-level qualification must also meet the course content criteria in the [policy statement](#). Where a senior housing manager or housing executive is working towards a higher-level qualification that meets this, they would be considered compliant.

### **Qualifications can be regulated by an equivalent body to Ofqual or predecessor body**

Relevant qualifications must be regulated by Ofqual and meet the criteria for qualification levels set out above and the criteria for qualification content set out below.

It is proposed that Relevant Persons and Relevant SP Managers who hold/are working towards a qualification in housing management regulated by the Scottish Qualifications Authority (SQA), Qualifications Wales (QW), or the Council for the Curriculum, Examinations and Assessment (CCEA) (or a predecessor), will be deemed to be compliant and will not have to gain another Ofqual-regulated qualification. This is provided the qualification is at the required level and meets the course content criteria.

Those who hold a qualification in housing management obtained before the establishment of Ofqual in 2008 will be deemed to hold a relevant qualification if the qualification meets the following criteria:

- It is a qualification that was regulated by a predecessor of Ofqual
- For senior housing managers, the qualification is equivalent to, or of a higher level than, an Ofqual regulated Level 4 qualification and for senior housing executives, equivalent to, or of a higher level than, an Ofqual regulated Level 5 qualification; and
- It meets the relevant course content requirement.

#### **Relevant qualifications must meet specific course content criteria**

It is expected that senior housing managers and executives have a qualification focused on managing the delivery of housing services which is relevant to social housing. It is proposed that course content cover specific modules/topics, as set out below.

For senior housing managers (or individuals who are a service provider):

- Professional practice skills for housing management e.g collaborative working and exercising professional judgement
- Ensuring needs of tenants are met (e.g., those with additional needs);
- Customer service in housing including effective engagement with tenants and delivering respectful and professional housing services
- Relevant housing law
- National housing policy and current trends driving the housing sector; and
- Embedding organisational policies in housing organisations.

For senior housing executives:

- Ethical practices and understanding how these apply to housing organisations and professionals
- Professional practice skills for housing management such as collaborative working and exercising professional judgement

- Ensuring needs of tenants are met (e.g. those with additional needs)
- Customer service in housing including effective engagement with tenants and delivering respectful and professional housing services
- Strategic and business planning for housing management
- Leadership and management in the context of housing management; and
- Stakeholder engagement and managing relationships in housing management.

Qualification courses must equip staff not only with relevant technical, legal or business knowledge and skills but also with the soft skills, including engagement with tenants, delivering respectful and professional customer services and meeting tenants' needs.

#### **Section 4: What constitutes 'working towards' a qualification?**

Once enrolled, staff should commence their course and begin making progress towards completing their qualification within six months. It is recognised that in some cases there may be no available course start date within the first six months after enrolment, particularly where the person is undertaking a degree level qualification. In this case, the person would need to start making progress towards completing the qualification within 12 months of enrolment. Where a person enrolls, but then needs to take an extended period of absence from work, for example due to maternity leave or sickness, they would need to start making progress towards completing their qualification as soon as is reasonably practicable thereafter.

It is expected that qualifications should be completed within the time limit or estimate set by the qualification provider. Where no time limit is set, it is proposed that it should not take more than two years to complete a qualification from the point of enrolment except in exceptional circumstances, e.g. where an individual is absent due to periods of sickness, maternity leave or they are reservists in the armed forces. Qualification providers are expected to provide some level of flexibility on time limits if individuals' personal circumstances change.

If someone is required to get a lower-level qualification as a prerequisite to enrolling on a Level 4 or 5 qualification (or foundation degree), they must enrol upon a relevant qualification at the required level within six months of receiving their award for the lower-level qualification.

In a small number of specific circumstances, a person can be classified as 'working towards' a qualification even if they are not enrolled on a relevant qualification if they are absent from work or due to begin an extended absence from work which means it would not be feasible for them to undertake the qualification; and the intention is to enrol them on the qualification within six months of them returning.

### Section 5: Transition period

The aim is to ensure this Standard is implemented as quickly as possible, but it is recognised that this needs to be done in a practical and deliverable way which minimises adverse impacts on service delivery to tenants. It is also recognised that sufficient time needs to be built in for providers to build their capability and capacity to deliver training and qualifications at the scale required and within the time periods stipulated. The [impact assessment](#) sets out the expected costs of the qualification requirements across 10 years and views are sought on the costs and benefits of the requirements.

The term "transition period" refers to the period of 24 months beginning with the day that the Competence and Conduct Standard comes into force (expected April 2025). Following the end of this transition period, the normal rules will apply.

It is proposed that at least half of those in scope who are in post at the beginning of the transition period must be working towards or have completed a relevant qualification, within the first 12 months of the transition period. Where a registered provider or service provider only has one individual in scope in post at the beginning of the transition period they will need to have, or be working towards, a relevant qualification by the end of the transition period unless they are deemed to already be compliant.

Anyone in scope and in post at the beginning of the transition period, or who moves into such a

role during the first 18 months of the transition period, will need to have completed or be working towards a relevant qualification by the end of the transition period unless already compliant.

### Adjusted transition period for small registered provider (and their service providers)

It is proposed that registered providers which provide fewer than 50 units of social stock (and their service providers) will have twice the amount of time to ensure compliance.

### Section 6: Transitional arrangements for partially compliant qualifications and apprenticeships

During the transition period, those who hold a qualification which partially covers the course content criteria must complete additional accredited training or accredited CPD modules to cover the remaining criteria. Following the transition period, qualifications will only be deemed relevant if they meet all the course content requirements.

This recognises that it would be disproportionate to expect staff who already hold relevant technical or construction related qualifications (e.g. RICS) to undertake an additional qualification. It is proposed that this transitional arrangement, which will apply during the transition period, will give the relevant qualifications providers time to update their course content to fully meet the qualification requirement content criteria should they wish to.

After the transition period, qualifications will need to meet all the criteria.

### Transitional arrangements for apprenticeship programmes undertaken without a qualification element

If a senior housing manager has completed an apprenticeship programme without a qualification element by the end of the transition period or prior to the time the qualification element of the Standard comes into force, they will be compliant if:

- They have passed their end point assessment for their apprenticeship programme before the end of the transition period

- The apprenticeship programme was delivered at an equivalent level to an Ofqual regulated Level 4 qualification
- The apprenticeship programme met the course content requirements.

Where a senior housing manager is, during the transition period, undertaking an apprenticeship that meets the criteria they are deemed to be working towards a relevant qualification. 'Working towards' means they are enrolled upon the apprenticeship but have not yet commenced it and the end of the transition period has not passed or they are enrolled upon, and making progress towards completing the apprenticeship and the end of the transition period has not passed.

NB. This transitional arrangement will only apply to senior housing managers as there is no Level 5 apprenticeship programme available.

### Section 7: Requirements for registered providers in respect of Relevant SP Managers

Registered providers will often delegate all or some housing management services to service providers (defined in section 194B(2) of the Housing and Regeneration Act 2008), who are responsible for providing services in connection with the management of social housing on behalf of the registered provider. Examples include arms-length management organisations (ALMOs) and tenant management organisations (TMOs). They could also be a private company or individual contracted to manage delivery of housing management services.

The Standard will require registered providers to take steps to secure that Relevant SP Managers of service providers (including relevant sub-contractors) have/are working towards a relevant qualification.

Implied terms have been introduced into agreements between registered providers and service providers by s217A of the 2008 Act so from the point the Standard comes into force, service providers will be contractually obliged to ensure their Relevant SP Managers have/are working towards relevant qualifications. The implied terms relate only to the qualification requirement, not to the broader requirements of the Standard.

Registered providers will be required to:

- Consider how they will use the terms implied in management services agreements to ensure Relevant SP Managers have/are working towards a relevant qualification
- Bring the qualification element of the Standard to the attention of relevant service providers, and ensure the providers are aware of their obligations.

The [policy statement](#) provides guidance for service providers to help them understand the implications. The Regulator must consult with bodies nominated by the Secretary of State who represent the interests of service providers for registered providers: in this case the National Federation of ALMOs and the National Federation of TMOs.

## Enforcement

The Regulator of Social Housing will monitor and regulate compliance with the new Standard through its assurance-based approach to regulation. This means it will seek assurance from registered providers as to their adherence.

## Next steps

Once issued formally, the direction will be binding on the Regulator who will then consult on the Standard it proposes to set before it comes into force (proposed for April 2025).

The proposed direction has no end date but may be subject to change or revision (which would be subject to further consultation).

## CIH response

As the professional body for housing, we're committed to supporting the professionalism agenda and welcome the government's support for this, with a focus on competence and conduct, including mandating qualifications for key senior roles. Qualifications are an effective way of ensuring professionals have the required knowledge and skills. But professionalism is more than a qualification; it's about



following a code of conduct and ethics, and displaying the right behaviour, attitude, and empathy.

Over the coming weeks we'll be digesting the detail of the proposals and speaking to members and the sector more widely about their implementation. We'll update this document as we go.

We will update members as further detail is released. If you have any questions, please contact the CIH policy team: [policyandpractice@cih.org](mailto:policyandpractice@cih.org).

## How to feed in your views

The online [consultation](#) is open until 2 April. We know the sector will want to ensure the correct balance is struck and that regulation around professionalism in housing is meaningful, accessible, and effective. To share your thoughts and help inform our response please email [policyandpractice@cih.org](mailto:policyandpractice@cih.org) and/or sign up for the following events:

- [The Social Housing Roundtable](#)  
(open to all) on 23 February,  
14:00 - 15:00
- [Lunch and Learn: The Conduct and Competency Standards](#) (member only) 12 March, 12:00 - 13:00

