



Camden Living Housing Association Limited

Competence and Conduct Policy

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Policy Owner:	Board
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1. Introduction and Purpose

- 1.1. Camden Living Housing Association Ltd (CLHA) is a registered provider of social housing. The Board of Directors and the organisation are committed to maintaining the highest standards of competence and professional conduct across all staff, contractors, and board members who are involved in the delivery of housing management services.
- 1.2. This Policy has been developed to meet the requirements of the Regulator of Social Housing's (RSH) Competence and Conduct Standard, which comes into force on 1 October 2026.

The Standard requires all registered providers to:

- Ensure that relevant staff and those involved in housing management have the skills, knowledge, experience, and behaviours to deliver high-quality services to tenants
- Adopt and embed a written competence and conduct policy covering learning and development, performance appraisal, and poor performance management

- Adopt and embed a Code of Conduct for relevant staff
- Ensure that senior housing managers and executives hold, or are working towards, an approved housing management qualification
- Hold contractors and services providers accountable for the competence and conduct of their staff; and
- Give tenants meaningful opportunities to scrutinise and influence this policy and the Code of Conduct.

1.3. CLHA is classified as a small, registered provider (under 1,000 homes) and benefits from a four-year transition period (from 1 October 2026 to 30 September 2030) to achieve full compliance with the qualification requirements of the Standard.

1.4. This Policy applies to all individuals engaged by CLHA in housing management activities, whether as employees, contractors, or board members, as set out in Section 3. It has been prepared with reference to the government's final direction and policy statement, National Housing Federation (NHF) guidance on implementing the Standard and Chartered Institute of Housing (CIH) professional standards.

2. Legal, Regulatory and Policy Requirements

2.1. This policy has been developed in accordance with and should be read alongside the following regulatory requirements and policy frameworks.

Framework	Relevance to This Policy
RSH Competence and Conduct Standard (in force 1 October 2026)	Primary regulatory driver; mandatory requirements for qualifications, conduct, development, and tenant involvement
Social Housing (Regulation) Act 2023	Enabling legislation for enhanced consumer regulation including this Standard
RSH Transparency, Influence and Accountability (TIA) Standard	Tenant voice, transparency, and accountability obligations

RSH Governance and Financial Viability Standard	Board competence and skills obligations
Housing Ombudsman Complaint Handling Code	Staff competence obligations in complaints handling
Equality Act 2010	Anti-discrimination duties applying to employment, training, and service delivery
NHF Code of Conduct (updated for the Standard)	Sector code of conduct with strengthened resident scrutiny, influence, and oversight
NHF 2020 Code of Governance	Board effectiveness, skills, and appraisal expectations adopted by CLHA
CLHA Code of Conduct (Appendix A)	Companion document to this Policy
CLHA Board Member Skills and Competency Framework (Appendix B)	Board-specific competency expectations

3. **Scope and Application**

- 3.1. This Policy applies to all individuals who have a substantive role in the delivery or oversight of housing management services on behalf of CLHA. In line with RSH and government guidance, a substantive role is defined as one where housing management activities constitute approximately 50% or more of the individual's working time, or where housing management is an important and substantial aspect of their role.
- 3.2. Housing management services include tenancy management; repairs and maintenance management; estate management; customer services; lettings and allocations; income and rent management; asset management (including building and fire safety); anti-social behaviour management; complaints handling; and capital or major works. Care and support services (for example personal care in supported housing) are outside the scope of the Standard.
- 3.3. Under the Housing and Property Services Agreement between CLHA and London Borough of Camden, operational services are delivered by the London Borough of Camden (LBC). As such LBC staff engaged in delivering the services fall within the scope of this policy

3.4. In scope:

- CLHA staff and Executive Team members;
- CLHA's Chief Company Officer;
- Board members and co-opted members of the CLHA Board;
- Contractors and their staff who are substantively involved in delivering housing management services on CLHA's behalf (including tenancy management, repairs and maintenance management, lettings, allocations, complaints handling, rent management, and anti-social behaviors);
- Managing agents or consultants engaged on a substantive housing management basis.

Qualification scope:

3.5. The RSH Competence and Conduct Standard sets specific qualification requirements for

Role Category	Definition	Required Qualification Level
Senior Housing Executive	The most senior individual with overall responsibility for housing management services (i.e. the Chief Company Officer / CEO equivalent). Functions typically include overall strategic direction and service quality accountability; developing and embedding organisational culture; implementing performance management strategies; and ensuring accessible, customer-focused policies and procedures.	Level 5 housing management qualification or above (or equivalent foundation degree / undergraduate or postgraduate degree meeting the criteria)

Senior Housing Manager	An individual who manages other staff in the delivery of housing management services, usually managing direct service delivery to tenants across functions such as customer services, complaints, lettings, income, repairs, asset management, ASB, and estates.	Level 4 housing management qualification or above
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3.6. Transition Period

As a provider with under 1,000 homes, CLHA has a four-year transition period in which to ensure that relevant senior staff hold or are actively working towards the required qualification. The transition period runs from 1 October 2026 to 30 September 2030. The same four-year period applies to Relevant Managers of CLHA's services providers in respect the meeting CLHA's requirements. CLHA commits to progressing qualification compliance as swiftly as is practical within this period and will not treat the transition period as a reason to defer action.

4. Our Commitment to Competence and Conduct

- 4.1. CLHA's Board of Directors is fully committed to the professional standards required by the RSH's Competence and Conduct Standard. We believe that competent, well-trained, and ethically grounded staff and board members are fundamental to delivering good outcomes for our tenants and to maintaining the organisation's regulatory standing.
- 4.2. Technical qualifications alone are not enough. Drawing on sector best practice CLHA recognises that tenants experience professionalism through everyday interactions — listening, empathy, clear communication, and respectful handling of complaints — as much as through formal credentials. This Policy therefore addresses both technical competence and the behaviours that make competence real for residents.
- 4.3. Our commitments under this Policy are:

- To ensure that every individual who delivers or oversees housing management services on CLHA's behalf has the skills, knowledge, and behaviours to do so to a high standard;
- To invest in the professional development of our staff, supporting them to achieve relevant qualifications and maintain their competence throughout their careers
- To embed a culture of respect, professionalism, and accountability across the organisation, with equal weight given to technical knowledge and relational (soft) skills
- To give tenants a genuine voice in shaping our competence and conduct expectations
- To regularly review and improve this Policy in response to regulatory guidance, tenant feedback, and organisational learning

5. Competency Framework

5.1. Core Competencies for Housing Management Staff

All CLHA/relevant LBC staff with housing management responsibilities are expected to demonstrate the following core competencies in carrying out their role:

Competency Area	What This Means in Practice
Resident-Focused Service	Treating all tenants with dignity, empathy, and respect; understanding their needs; and delivering services that genuinely improve their housing experience
Technical Housing Knowledge	Understanding of tenancy law, housing management practice, repairs processes, building safety, and relevant legislation sufficient for the role
Communication and Interpersonal Skills	Communicating clearly and professionally, whether in writing, by telephone, or in person; active listening; adapting communication style to individual needs; and relational communication under pressure

Emotional Intelligence and Conflict Competence	Recognising one's own and others' emotional states; responding thoughtfully rather than reactively; surfacing tensions early and moving from blame toward constructive problem-solving
Equality, Diversity and Inclusion	Applying equality principles in all interactions with tenants, contractors, and colleagues; recognising and appropriately responding to individual needs and protected characteristics
Complaints and Problem Resolution	Handling complaints and disputes fairly, empathetically, and in accordance with the Housing Ombudsman's Complaint Handling Code and CLHA's Complaints Policy
Decision-Making and Judgement	Making sound, evidence-based decisions within the scope of the role; seeking guidance when appropriate; exercising professional and ethical judgement
Accountability and Integrity	Taking personal responsibility for actions; acting honestly and transparently; raising concerns about potential wrongdoing through appropriate channels
Safeguarding Awareness	Recognising signs of vulnerability, domestic abuse, and safeguarding risk; knowing how to make a safe referral and to whom
Learning and Continuous Improvement	Actively seeking feedback on performance; engaging with training and development; applying learning to improve practice

5.2. Additional Competencies for Senior Roles

In addition to the core competencies above, individuals in Senior Housing Executive and Senior Housing Manager roles are expected to demonstrate:

Competency Area	What This Means in Practice
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Strategic Leadership	Setting a clear direction for housing services; translating regulatory requirements and organisational strategy into operational action; embedding organisational culture
Financial Acumen	Understanding of housing finance, rent setting, arrears management, and budgetary oversight
Regulatory Knowledge	In-depth understanding of the RSH Consumer Standards (including Competence and Conduct), the Housing Ombudsman's Code, and other relevant regulatory requirements
People Management and Coaching	Managing, developing, and appraising staff effectively; creating a positive and inclusive team culture; using everyday interactions to build staff capability and psychological safety
Risk Management	Identifying and managing risks to service delivery and regulatory compliance
Governance and Accountability	Supporting effective board governance; providing clear, accurate reporting to the Board and other stakeholders
Stakeholder Engagement	Building constructive relationships with tenants, the parent body, contractors, regulators, and partner organisations

5.3. **Board Member Competencies**

Board members are not covered by the RSH's qualification requirements but are required to collectively possess the skills and experience necessary to govern CLHA effectively. The CLHA Board shall maintain a Board Skills Matrix), reviewed annually, to identify and address any gaps in the board's collective competence. This aligns with the NHF 2020 Code of Governance and CLHA's Board appraisal and skills-matrix processes

Expected competencies across the board include:

- Strategic oversight and governance;
- Financial management and audit;

- Housing management and tenancy law;
- Legal, regulatory, and compliance knowledge (including RSH Standards);
- Risk management;
- Resident engagement and tenant scrutiny;
- Equality, diversity, and inclusion;
- Construction, repairs, and asset management; and
- HR and employment law.

6. Qualifications Policy

- 6.1. In accordance with the RSH Competence and Conduct Standard and the government's Competence and Conduct Policy Statement, CLHA requires that relevant senior staff hold, or are actively working towards, an approved housing management qualification at the level appropriate to their role. This includes both CLHA, LBC as the Service Provider and sub-contractors employed by both CLHA and LBC.

Role	Required Qualification Level	Compliance Deadline
Senior Housing Executive (e.g. Chief Officer)	Level 5 regulated qualification or apprenticeship in housing management (or equivalent foundation degree / undergraduate or postgraduate degree meeting the criteria)	By 30 September 2030 (4-year transition)
Senior Housing Manager	Level 4 regulated qualification or apprenticeship in housing management (or higher qualification meeting the criteria)	By 30 September 2030 (4-year transition)

Approved qualifications are those regulated by Ofqual (or equivalent) and recognised as meeting the government's content criteria, typically including CIH-approved pathways. Qualifications must generally total more than 120 guided learning hours. Staff with partially compliant qualifications may

complete additional training modules to cover any missing course content — a permanent arrangement beyond the transition period.

Senior Housing Manager qualifications must develop knowledge and skills in professional practice skills for housing management (collaborative working, professional judgement, and ethical practice); equality, diversity and inclusion and awareness of needs and vulnerabilities; customer service in housing including respectful engagement with tenants; and national housing policy, law and regulation relevant to social housing management.

Senior Housing Executive qualifications must additionally develop knowledge and skills in leadership and management in a housing context, and stakeholder engagement and relationship management.

CLHA will maintain a current list of approved qualifications and keep this under review as government and CIH guidance develops. Flexibility is available for technical roles (construction, building safety, estate management) and cross-tenure roles where alternative housing-related qualifications meet the criteria.

6.2. New Appointments

For new appointments to Senior Housing Executive or Senior Housing Manager roles made after 1 October 2026, CLHA will:

- Require candidates to hold, or demonstrate that they are working towards, the relevant qualification at appointment; or
- Where a candidate does not yet hold the qualification, include as a condition of appointment a requirement to enroll in an approved qualification within 12 months of starting in post (in line with the government's standard enrolment period).

6.3. Existing Postholders: Transition Period

During the four-year transition period (October 2026 – September 2030), CLHA will:

- Assess the current qualification status of all in-scope staff within three months of this policy coming into force;

- Agree individual development plans for any staff who do not yet hold the required qualification; and
- Support staff to enroll in and complete an approved qualification (or any required top-up modules) within the transition period.

Where a member of staff in scope fails to achieve their required qualification within the agreed timeframe, CLHA will:

- Require the individual to re-enroll in the qualification or enroll in an equivalent approved qualification within six months; and
- Where failure to achieve the qualification indicates an underlying competence concern, address this through the performance management process (see Section 9).

7. Code of Conduct

- 7.1. CLHA's Code of Conduct (set out in full at Appendix A) sets out the standards of behaviour and professional conduct expected of all relevant staff and contractors. The Code reflects the RSH's requirement for registered providers to adopt and embed a Code of Conduct and has been developed with reference to the Chartered Institute of Housing's professional standards, the NHF Code of Conduct (updated ahead of the Standard with stronger resident scrutiny, influence, and oversight), and the expectations of CLHA's residents aims to make it easy for anyone to make a complaint. Complaints can be made in any way that is convenient to them. This includes complaints made by phone, email, in person or by letter.

7.2. Core Conduct Standards

All individuals within the scope of this Policy are expected to:

Treating Residents with Respect

- Treat every tenant with dignity, empathy, and respect at all times, regardless of the nature of their enquiry or any history of complaint or arrears;
- Listen actively to tenants' concerns, avoid dismissive language or behaviour, and take all reasonable steps to address problems promptly;
- Never discriminate against a tenant on the basis of a protected characteristic under the Equality Act 2010; and

- Maintain awareness of the potential impact of housing decisions on vulnerable residents, including those experiencing domestic abuse, mental health difficulties, or bereavement.

Professionalism and Integrity

- Act honestly and transparently in all dealings with tenants, colleagues, contractors, and the Board;
- Declare any actual or potential conflicts of interest promptly and in accordance with CLHA's Conflicts of Interest Policy;
- Never accept gifts, hospitality, or other benefits that could reasonably be perceived as influencing their professional judgement; and
- Maintain appropriate professional boundaries in all interactions with tenants and other stakeholders.

Confidentiality

- Handle all personal and sensitive information in accordance with CLHA's data protection policies and the UK General Data Protection Regulation (UK GDPR);
- Never share a tenant's personal information, including their housing circumstances or location, with any third party unless authorised to do so; and
- Apply particular care to the confidentiality of information relating to domestic abuse, safeguarding, or other sensitive circumstances.

Accountability and Raising Concerns

- Take personal responsibility for decisions and actions taken in the course of the role;
- Raise any concerns about potential misconduct, poor performance, or regulatory risk promptly with the Chief Officer or Board Chair (as appropriate); and
- Engage with CLHA's Whistleblowing Policy where concerns cannot be raised through normal management channels.

7.3. Board Member Conduct Standards

Board members are additionally expected to:

- Act collectively and in the best interests of CLHA and its tenants;

- Respect the separation between governance (board) and management (staff) responsibilities;
- Maintain the confidentiality of board discussions and decisions until formally published;
- Declare conflicts of interest at each board meeting and in the annual Register of Interests; and
- Complete all mandatory board training and development as agreed with the Chair.

7.4. Embedding the Code of Conduct

CLHA will embed the Code of Conduct by:

- Providing the Code to all relevant staff at induction and requiring them to confirm they have read and understood it;
- Appending the Code to the Housing and Property Services Management Agreement between CLHA and LBC (the Service Provider) to ensure the provision of service by the Service Provider reflects its requirements
- Including the Code of Conduct as a standing item in staff induction training;
- Reviewing the Code every two years and whenever there is a material change to the regulatory or organisational context;
- Making the Code accessible to tenants on request and inviting tenant feedback on the Code during its annual review; and

Including adherence to the Code as a criterion in annual performance appraisals.

8. Learning, Development and Performance Appraisal

8.1. Induction

All new staff with housing management responsibilities (including LBC staff delivering services under the Housing and Property Services Agreement) will complete a structured induction programme that includes:

- An overview of CLHA's housing stock, tenants, and organisational context;
- Introduction to the relevant RSH Consumer Standards, including the Competence and Conduct Standard;
- Familiarisation with this Policy and the Code of Conduct;

- Training on CLHA's key policies, including Complaints, Equality and Diversity, Safeguarding, Data Protection, and Domestic Abuse;
- Introduction to the qualification requirements applicable to their role; and
- Confirmation that the new staff member has read and understood the Code of Conduct.

Induction should be completed within the first month of employment.

8.2. Annual Performance Appraisal

All new staff with housing management responsibilities (including LBC staff delivering services under the Housing and Property Services Agreement) will complete a structured induction programme that includes:

- An overview of CLHA's housing stock, tenants, and organisational context;
- Introduction to the relevant RSH Consumer Standards, including the Competence and Conduct Standard;
- Familiarisation with this Policy and the Code of Conduct;
- Training on CLHA's key policies, including Complaints, Equality and Diversity, Safeguarding, Data Protection, and Domestic Abuse;
- Introduction to the qualification requirements applicable to their role; and
- Confirmation that the new staff member has read and understood the Code of Conduct.

In addition to the annual appraisal, staff are encouraged to have regular one-to-one conversations with their line manager (at minimum quarterly) to discuss performance, wellbeing, and development

8.3. Learning and Development Planning

CLHA will maintain an organisational learning and development plan, updated annually, that:

- Identifies mandatory training requirements (including housing management qualifications, safeguarding, data protection, equality and diversity, and complaints handling);
- Identify development needs arising from appraisals, service reviews, tenant feedback, and staff surveys;

- Allocates resources (time and budget) for staff development, including soft-skills and people-management pathways alongside technical qualifications; and
- Records completion of training and development activity for all relevant staff.

CLHA will support staff in accessing training and qualifications by:

- Providing study leave for relevant qualification programmes;
- Meeting (or contributing to) the cost of approved qualifications;
- Sharing information about CIH-approved qualifications and other relevant training providers; and
- Ensuring that workload expectations allow staff adequate time to engage in development activity.

8.4. Continuing Professional Development (CPD)

CLHA encourages all housing management staff to engage in continuing professional development (CPD) throughout their careers. CPD activities may include:

- Completing a relevant housing management qualification, apprenticeship, or top-up modules;
- Attending sector conferences, webinars, or events (including CIH and NHF events);
- Undertaking short courses or e-learning modules on topics relevant to their role, including relational communication, conflict competence, and emotional intelligence;
- Reading and reflecting on sector publications, regulatory guidance, and Housing Ombudsman reports; and
- Peer learning and knowledge sharing within CLHA and with partner organisations.

9. Managing Poor Performance and Conduct Concerns

9.1. Identifying Poor Performance

Poor performance may come to light through:

- Annual appraisal or regular one-to-one supervision;

- Tenant complaints relating to an individual's conduct or service delivery;
- Housing Ombudsman determinations or regulatory findings;
- Observations by a line manager or board member;
- A safeguarding concern or conduct-related incident; or

The organisation's whistleblowing process

9.2. Addressing Poor Performance

CLHA is committed to addressing poor performance in a supportive, fair, and proportionate manner. These requirements will also be made of the LBC as the Service Provider. The following principles apply:

- **Early intervention:** Performance concerns will be raised and addressed as early as possible, through informal conversation and support, before formal processes are invoked;
- **Clarity:** The individual will be told clearly what the performance concern is, what improvement is expected, and the timescale and support available;
- **Support:** CLHA/LBC will consider whether additional training, adjusted responsibilities, or other support could help the individual to improve;
- **Fairness:** Any performance management process will be conducted in accordance with CLHA's/LBC's HR policies and the individual's employment contract; and
- **Escalation:** Where informal measures do not achieve the required improvement, or where the performance concern is serious, formal capability or disciplinary procedures will be invoked.

9.3. Disciplinary Procedure

Conduct that falls seriously short of the standards set out in the Code of Conduct may be addressed through CLHA's/LBC's formal disciplinary procedure. Serious misconduct — including dishonesty, discrimination, harassment, breach of confidentiality, or actions that put tenants at risk — may result in summary dismissal.

For board members, the Board Chair will address conduct concerns in

accordance with CLHA's Articles of Association and the Board Code of Conduct.

9.4. Contractor Conduct

Where a conduct concern involves a contractor or their staff, CLHA will:

- Raise concern with the contractor promptly and in writing;
- Request the contractor to investigate and respond within an agreed timescale;
- Retain the right to remove an individual contractor employee from CLHA-related work where their conduct falls below the standards required by this Policy; and

Where a contractor's conduct pattern is persistent, consider the implications for the contractual relationship

10. Contractor/Service Provider Accountability

10.1. Applying the Standard to Contractors

The RSH Competence and Conduct Standard require registered providers to take appropriate steps to ensure that contractors and service providers who are substantively involved in housing management also meet the competence and conduct requirements of the Standard.

Qualification requirements apply to Relevant Managers of services providers who deliver a comprehensive social housing management service (all or the majority of housing management functions) on CLHA's behalf. From 1 October 2026, implied terms under section 217A of the Housing and Regeneration Act 2008 require such services providers to secure that their in-scope senior managers and executives gain appropriate qualifications, subject to the four-year transition period applicable to small providers. Where a services provider manages only a single housing management function (for example asset management alone), an exemption may apply.

CLHA will meet its obligations by:

- Including competence and conduct requirements in all contracts for housing management services
- Requiring contractors to ensure their staff have the skills, knowledge, and behaviours to deliver good-quality services;

- Adopting a code of conduct for staff engaged on CLHA contracts; and support relevant senior staff to achieve required qualifications within applicable timescales
- Requesting evidence of contractors' approach to staff competence and development as part of procurement processes;
- Including competence and conduct expectations as a standard agenda item in contract monitoring meetings; and
- Taking proportionate action where a contractor fails to meet the required standards, up to and including termination of contract.

11. Tenant (Resident) Involvement

11.1. Tenants' Rights Under the Standard

The RSH Competence and Conduct Standard require registered providers to give tenants meaningful opportunities to influence and scrutinise the development of the provider's competence and conduct policy and Code of Conduct. CLHA fully embraces this requirement, consistent with the RSH Transparency, Influence and Accountability Standard and the NHF Code of Conduct's strengthened focus on resident scrutiny.

11.2. How Residents Can Shape this Policy

CLHA commits to:

- **Consultation:** Sharing this Policy and the Code of Conduct with residents, actively seeking written or in-person feedback;
- **Accessible information:** Making this Policy and the Code of Conduct available to any resident who requests them, in a plain-English summary and, where requested, in alternative formats;
- **Complaint-driven improvement:** Where residents' complaints reveal a pattern of conduct or competence concern, recording and addressing this explicitly in the next review of this Policy; and
- **Reporting back:** Publishing an annual statement (to be included in CLHA's annual report or equivalent communication to residents) setting out: the qualifications held or being pursued by relevant senior staff; key learning and development activities completed during the year; and any

changes made to this Policy or the Code of Conduct in response to tenant feedback or regulatory guidance.

12. Governance and Board Oversight

12.1. Board Responsibility

The Board of Directors of CLHA has ultimate responsibility for ensuring that the organisation meets the requirements of the RSH Competence and Conduct Standard. In discharging this responsibility, the Board will:

- Approve this Policy and any material amendments;
- Receive an annual report on compliance with this Policy, including the qualification status of in-scope staff, training completion rates, and any conduct concerns addressed during the year;
- Ensure that the board's own collective competence is regularly assessed through the Board Skills Matrix and the annual board appraisal process; and
- Commission independent board effectiveness reviews at appropriate intervals, and at minimum every three years, consistent with the NHF 2020 Code of Governance.

12.2. Designated Lead

The Chief Company Officer is the designated lead for the operational implementation of this Policy. Responsibilities include:

- Maintaining up-to-date records of the qualification status and development plans for all in-scope staff;
- Managing the annual appraisal and development planning cycle;
- Monitoring contractor compliance with competence and conduct requirements;
- Overseeing tenant engagement on this Policy; and
- Reporting annually to the Board on compliance with this Policy.

12.3. Annual Compliance Report

The Chief Officer will prepare and present an annual Competence and

Conduct Compliance Report to the Board, covering:

Reporting Area	Detail
Qualification status	Qualifications held and progress against the transition plan for all in-scope staff
Appraisal completion	% of in-scope staff who have completed a formal annual appraisal
Training and development	Summary of learning and development activities completed and planned (technical and soft skills)
Conduct concerns	Summary of any conduct issues addressed during the year (anonymised)
Contractor compliance	Update on contractor adherence to competence and conduct requirements
Tenant feedback	Summary of tenant engagement and any feedback received on this Policy
Regulatory developments	Any changes to the RSH Standard or regulatory guidance since the last report

13. **Equality, Diversity and Inclusion**

CLHA is committed to applying equality principles in all aspects of this Policy. In particular:

- All development opportunities, qualifications support, and performance processes will be applied consistently and without discrimination on the basis of any protected characteristics
- Reasonable adjustments will be made for staff or board members with disabilities to enable them to meet the requirements of this Policy
- The competency framework and Code of Conduct explicitly include equality, diversity, and inclusion as core competencies
- Equality impact will be considered when this Policy is reviewed; and
- CLHA will monitor whether any group of staff is disproportionately affected by performance or conduct processes and take steps to address any such pattern.

14. **Monitoring and Review**

14.1. **Policy Review**

This Policy will be reviewed:

- Every two years as a minimum;
- Following any significant change to the RSH Competence and Conduct Standard or associated guidance;
- Following any significant conduct or performance incident that reveals a gap in the Policy's effectiveness; and
- In response to resident feedback that warrants a change to the Policy or Code of Conduct.

14.2. **Implementation Milestones**

The following milestones guide implementation:

Milestone	Target Date
Policy approved by Board	September 2026
Policy approved by the Service Provider	September 2026 - Complete
Code of Conduct issued to all in-scope staff	October 2026
First tenant consultation on Policy and Code	November/December 2026
Qualification status assessment for all in-scope staff	January 2027 (within 3 months of commencement)
Individual qualification development plans agreed	March 2027
First annual compliance report to Board	October 2027
All in-scope staff enrolled or qualified	By September 2030

15. **Related Policies and Documents**

This Policy should be read alongside the following:

Document	Status
CLHA Code of Conduct	Companion document
CLHA Board Member Skills and Competency Framework	To be reported to Board as part of Governance Update
CLHA Staff Handbook (including Disciplinary and Capability Procedures)	To be developed
CLHA Complaints Policy	Existing
CLHA Equality and Diversity Policy	Existing
CLHA Safeguarding Policy	Existing
CLHA Domestic Abuse Policy	Existing
CLHA Whistleblowing Policy	Existing
CLHA Conflicts of Interest Policy	Existing
RSH Competence and Conduct Standard (October 2026)	Regulatory
Government Competence and Conduct Policy Statement	Regulatory
RSH Governance and Financial Viability Standard	Regulatory
Housing Ombudsman Complaint Handling Code	Regulatory
NHF Code of Conduct / NHF 2020 Code of Governance	Sector guidance

16. **Appendices**

Appendix A – CLHA Code of Conduct

